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## **POLICY DOCUMENT**

### **Communications and Disclosure Policy**

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## 1. BACKGROUND AND PURPOSE

Communication is a broad concept that includes both financial reporting and customer interaction.

This Communications and Disclosure Policy for Catena Media plc (the “**Company**”) and its subsidiaries (jointly referred to as the “**Catena Group**” or “**Catena**”) has been developed because communication is a strategic tool of crucial importance to the market’s perception of the Company brand.

For our brand management and communications team to remain efficient in the long term, our communications must be coordinated and comply with a number of comprehensive guidelines. To ensure that our communications take the long-term perspective into account, they must always be consistent with the shared values of the Catena Group. This Communications Policy governs Catena Group’s external and internal communications and information disclosure.

As a publicly listed company, Catena is also required to ensure that all information disclosed by the Company is issued in compliance with applicable rules and regulations, including relevant stock exchange rules. This Communications Policy is intended to safeguard that Catena’s disclosure of information to the market is correct, relevant, consistent, reliable and that all stakeholders receive timely disclosure of “*Inside Information*”, as defined in the Company’s *Insider Policy*, as well as other relevant information.

## 2. AUDIENCE

This policy applies to all directors, employees (including interns, apprentices and trainees, third party hired or those engaged through an Employer of Record), independent contractors, founders on earn-out and other similarly contracted workers (collectively known as “**Relevant Persons**”).

## 3. APPLICABLE RULES AND REGULATIONS

Catena’s communications shall comply with the agreement entered into with NASDAQ, (the “**Rulebook**”), the Market Abuse Regulation (“**MAR**”)<sup>1</sup>, the EU Shareholder Rights Directive (Directive 2007/36/EC), Chapter 12 of the Maltese Capital Markets Rules and all other applicable Swedish and Maltese laws, rules, regulations, guidelines and instructions, applicable from time to time.

The Rulebook is attached to this policy, as [Attachment 1](#).

## 4. CRISIS COMMUNICATION

The Company has adopted a [Business Continuity Emergency Contact List Plan](#) to provide executive management and all staff with a contact list to assure that Catena is prepared for and able to take effective actions to communicate, and/or restore the business’s most critical processes, functions, and systems in the case of a disaster. In the event of a crisis, the instruction and checklist set out in [Appendix 2, Crisis Communications Instruction and Checklist](#), shall be adhered to regarding internal and external information.

In addition, the Company has established a [Personal Data Breach Procedure](#) to ensure that personal data breaches are identified, documented, reported and managed. In the event of a personal data

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<sup>1</sup> REGULATION (EU) No 596/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC.

breach the routines, procedures and checklist set out in Appendix 2, Crisis Communications Instruction and Checklist, shall be adhered to regarding internal and external information.

Lastly, the Company may also adopt further communications guidelines and instructions that shall apply to all Relevant Persons.

## 5. GENERAL DISCLOSURE RULES

### 5.1 DISCLOSURE OF INSIDE INFORMATION

In accordance with MAR, the Company shall, **as soon as possible**, inform the public of information about decisions or other facts and circumstances that are considered Inside Information.

The Company shall disclose Inside Information using technical means that ensure that the Inside Information is disseminated to as wide an audience as possible on a non-discriminatory basis, free of charge and simultaneously throughout the EEA. The information shall be *simultaneously provided to Nasdaq Stockholm (the "Exchange")* in the way prescribed by the Exchange and, as soon as possible, be made available on the Company's *website*. To ensure compliance herewith, the Company has engaged an established information distributor to disseminate the Company's information.

The Company shall not combine the disclosure of Inside Information to the public with the marketing of its activities.

The concept of what constitutes Inside Information shall be evaluated on a case-by-case basis, as further set out in the *Insider Policy*. The Company may contact the Exchange for advice but is always ultimately responsible for fulfilling its duty of disclosure.

Inside information shall be treated confidentially and no unauthorised party shall be provided with such information prior to disclosure. Consequently, Inside Information may not be disclosed to analysts, journalists or any other parties, either individually or in groups, unless such information is simultaneously made public to the market. Subject to regulatory requirements, the Company may delay disclosure of Inside Information. The decision to delay disclosure of Inside Information shall be made by the CEO and shall comply with the rules, routines and processes as set out in the *Internal routines and procedures re. delay of disclosure of Inside Information*.

The requirement that the disclosure be undertaken "as soon as possible" indicates that there is some tolerance for the fact that the disclosure *could take some time to prepare*. The Company is, therefore, generally allowed to prepare and take the necessary actions to make sure that the disclosure is published on the regular communications channels used. Notwithstanding, in cases where the Company knows beforehand that a particular event will or is likely to materialise, the acceptable time period to administer the disclosure is shorter. If the information is significant, the Company may need to bypass procedures otherwise applied in order to enable the immediate disclosure of the Inside Information. Consequently, press releases should be drafted prior to making any important decisions giving rise to Inside Information.

The CEO is authorised to make decisions regarding disclosure of Inside Information. The decision to disclose Inside Information is considered part of the day-to-day administration of the business and not a matter for the Board. Hence, the Company cannot postpone disclosure of Inside Information until the Company's Board has reviewed and approved the disclosure.

The main rule is that Inside Information shall be disclosed as soon as possible. This applies regardless of whether markets are closed at the time of the event giving rise to the Inside Information.

### 5.1.1 Selective information

In special cases, where disclosure of Inside Information is made in the normal course of the exercise of employment, profession or duties, and where the person receiving the information owes a duty of confidentiality, the Company may provide information to persons who take an active part in the decision process or who, as a part of their professional role, are involved in the information process, before the Inside Information is disclosed to the public. This could entail information to major shareholders or contemplated shareholders in conjunction with an analysis prior to a planned new share issue, to advisors retained by the Company (for example to work on prospectuses prior to a planned share issue or other major transaction), to potential bidders or target companies in conjunction with negotiations regarding takeover bids, to rating institutions prior to credit ratings or to lenders prior to significant credit decisions. *This possibility shall, however, be used restrictively.*

The Company shall make clear to the recipient that the information shall be treated confidentially, and that the recipient has become an “Insider” (as defined in the *Insider Policy*) by virtue of receiving the information. The Company shall ensure that the recipient is added to the relevant Insider List (as defined in the *Insider Policy*), and that the processes and routines set out in the *Insider Policy* and referable to Insiders and Insider Lists are adhered to, for example that the insider is informed of the prohibition on trading in the securities to which the information relates and that any breach thereof constitutes a criminal offence under the Swedish Market Abuse Penal Act and can lead to a fine or up to six years of imprisonment. In addition, where relevant, the Company shall also ensure that the rules and procedures for market soundings in art. 11 of MAR and the implementing regulation (EU) 2016/959 laying down implementing standards for market soundings are adhered to.

### 5.1.2 Information leaks

If the Company, following a decision to delay public disclosure of Inside Information, learns that the relevant Inside Information has leaked to the market or elsewhere, the conditions for delaying disclosure will no longer be met as the Company can no longer ensure the information’s confidentiality. Consequently, the Company is required to disclose the relevant Inside Information to the public as soon as possible.

In the event Inside Information is given unintentionally to a third party, public disclosure of the information shall be made promptly.

#### **Procedure in case of information leaks**

In the event a person learns or suspects that inside information has leaked, the following process shall be followed:

- the CEO and the Chief Legal & Compliance Officer (“CLCO”) shall be immediately notified;
- the CEO, or a person designated by the CEO, shall contact the trading surveillance at the Exchange;
- the CEO shall notify the Board of Directors;
- the Exchange may decide to suspend trading in the Catena share;

- following a decision of the CEO or the Chairman of the Board of Directors and in consultation with the Exchange, Catena shall, if necessary, publish clarifying information to the market; and
- evaluation and amendment of procedures, if deemed necessary or appropriate, shall be undertaken.

## 5.2 OTHER DISCLOSURE REQUIREMENTS PURSUANT TO THE RULEBOOK

The Rulebook contains information disclosure requirements that go beyond the requirements in MAR. Consequently, the information subject to the disclosure requirements set out in the Rulebook shall always be disclosed *irrespective* of whether it constitutes Inside Information requiring disclosure pursuant to MAR. Such information regards:

- financial reports/statements;
- audit reports;
- forecasts and forward-looking statements;
- notices to attend general meetings of shareholders and information about resolutions adopted by the general meeting of shareholders;
- proposals and decisions to make changes in the share capital or the number of shares or other financial instruments related to shares of the Company;
- proposed and actual changes in the Board of Directors, management and auditors;
- decisions to introduce share-based incentive programmes;
- transactions between the Company and closely-related parties, which are not entered into in the normal course of business;
- substantial changes to the operations of the Company;
- decisions regarding admission to trading;
- information required by another trading venue; and
- disclosure considered necessary to provide fair and orderly trading.

Reference is made to the Rulebook for more information on the disclosure requirements set out above.

Information covered by the disclosure requirements pursuant to the Rulebook shall, regardless of whether it is considered Inside Information, be disclosed in the same manner as Inside Information, unless otherwise stated in the Rulebook.

## 5.3 INFORMATION TO THE EXCHANGE FOR SURVEILLANCE PURPOSES

Information to be disclosed pursuant to MAR or the Rulebook shall also be submitted to the Exchange for surveillance purposes no later than the moment at which the information is disclosed and in the manner prescribed by the Exchange.

Information for surveillance purposes shall be sent electronically in the manner prescribed by the Exchange. The Company can contact the Exchange for practical assistance. The Company has, however, engaged an established information distributor to ensure compliance with the rule.

## 5.4 ADVANCE INFORMATION TO THE EXCHANGE

Pursuant to the Rulebook, the Company is obliged to provide the Exchange with advance information when certain events occur. Such events consist inter alia of:

- if the Company has made internal preparations to make a public tender offer for financial instruments in another listed company;
- if the Company has been informed that a third party intends to make a public tender offer to the Company's shareholders and such public tender offer has not been disclosed and there are reasonable grounds to assume that the intention to make a public tender offer will be realised; or
- if the Company intends to disclose information that is assumed to be of extraordinary importance for the Company and its financial instruments.

## 6. DISCLOSURE AND METHODOLOGY

Information to be disclosed under MAR and the Rulebook shall be disclosed in a manner that ensures fast access and complete, correct and timely assessment of the information to the public. Public disclosure shall be made on a non-discriminatory basis, free of charge and simultaneously throughout the EEA. The Company has assigned an established information distributor to disseminate the Company's information to ensure compliance herewith.

Additional information on public disclosure of Inside Information is set out in the Commission Implementing Regulation (EU) 2016/1055.<sup>2</sup>

As set out in section 4.3 above, information to be disclosed shall also be submitted to the Exchange and made available on the Company's website.

A press release containing Inside Information shall contain a disclaimer stating that the publication is made in accordance with requirements set out in MAR (cf. section 6.2 below).

The Company shall not combine disclosure of Inside Information to the public with the marketing of its activities.

### 6.1 WEBSITE

The Company's website is the primary source of information for the Company's stakeholders. It shall contain information that is simple, clear and relevant to those who want to acquaint themselves with Catena, as well as contact details of relevant people at Catena. The website contains information aimed at customers, investors, media and potential Relevant Persons.

New information should be available on the website as soon as possible, preferably *immediately*, after it has been externally disclosed. No Inside Information may be published on the website unless it has previously been made public through other distribution channels.

Information that has been published in accordance with MAR or the Rulebook shall remain on the website for at least five (5) years after its publication unless otherwise expressly stated in MAR, the Rulebook or other applicable rules and regulations. Financial reports shall, however, be available for a

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<sup>2</sup> COMMISSION IMPLEMENTING REGULATION (EU) 2016/1055 of 29 June 2016 laying down implementing technical standards with regard to the technical means for appropriate public disclosure of inside information and for delaying the public disclosure of inside information in accordance with Regulation (EU) No 596/2014 of the European Parliament and of the Council

minimum of ten (10) years from the disclosure date. The same applies to corporate governance reports and sustainability reports, if any.

Inside Information and other “regulatory” press releases shall be accessible on an easily identifiable part of the Company’s website. Regulatory press releases include press releases pursuant to MAR, relevant legislation, the Rulebook and the Swedish Corporate Governance Code. The website shall be designed in such a way that the user can easily differentiate between the different types of press releases available on the website.<sup>3</sup> For the avoidance of doubt, information related to the marketing of the Company and its business shall not be mixed together with information that the Company is obliged to disclose under MAR.

Pursuant to the Swedish Corporate Governance Code, the website shall also contain the following information:

- the Company’s articles of association;
- information about the management and the Board of Directors of the Company;
- information regarding any incentive programmes;
- information regarding the annual general meeting, such as date and venue, the last date for matters to be submitted by shareholders for inclusion in the notice of the meeting, the notice of the meeting and the Board’s and the Nomination committee’s proposals and the minutes from each meeting; and
- information regarding the Nomination committee, such as the names of its members, as well as the name of the shareholder who appointed each member and how shareholders may submit recommendations to the Nomination committee.

## 6.2 PRESS RELEASES

Disclosure of information and press releases shall comply with the rules and regulations set forth in MAR, the Rulebook and other relevant legislation.

A press release containing Inside Information shall state that the information communicated is Inside Information (using a reference to MAR) and that the information is such that the Company is obliged to make it public pursuant to MAR. The most important information shall be clearly presented at the beginning of the press release – the header shall indicate the substance of the announcement. Moreover, the press release shall contain:

- the identity of the company;
- the identity of the person making the notification;
- the subject matter of the inside information; and
- the date and time of the communication to the media.

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<sup>3</sup> This could be achieved through a feature allowing users to single out press releases that have been labelled as containing inside information, by separating sections containing the different releases through headlines, or by clearly identifying the press releases that contain inside information in some other way.

- **Publication of annual reports**

When the Company publishes annual reports, the accompanying press release shall, if the Company's shares are listed on a regulated market, state that the information is published pursuant to the Maltese Listing Rules issued under the Financial Markets Act (Chapter 345 of the Laws of Malta). The annual report may not contain new price-sensitive information (Inside Information). Should it become clear during the preparation of the annual report that some information to be included in the report constitutes Inside Information, such information shall, as a main rule, be made public in a separate press release as soon as possible after the information has been confirmed.

- **Publication of half-year report**

When the Company publishes half-year reports, the press release shall state that *"the half-yearly report is being published in terms of the Capital Markets Rules issued by the Malta Financial Services Authority"*. If the half-year report also includes Inside Information, the press release shall also state that *"the half-yearly report contains information which Catena Media plc is obliged to make public pursuant to the EU Market Abuse Regulation"*. Should it become clear during the preparation of the half-year report that some information to be included in the report constitutes inside information, such information shall, as a main rule, be made public in a separate press release as soon as possible after the information has been confirmed.

- **Publication of interim reports other than half-year reports**

When the Company publishes interim reports other than half-year reports that include Inside Information, the press release shall state that the information is published pursuant to MAR. Should it become clear during the preparation of the interim report that some information to be included in the report constitutes Inside Information, such information shall, as a main rule, be made public in a separate press release as soon as possible after the information has been confirmed.

- **Press release in the event of an increase or decrease in the total number of shares and votes**

When the Company makes public an increase or decrease in the total number of shares and votes in the Company, the press release shall refer to the Maltese Listing Rules issued under the Financial Markets Act (Chapter 345 of the Laws of Malta).

- **Website publications and information to the Exchange**

Information disclosed by the company shall be *submitted simultaneously to the Exchange*. All press releases and reports shall be made available on the Company's *website* immediately after publication.

- **Publication of several events constituting Inside Information in one press release**

If the Company publishes one press release covering several events, each of which constitute Inside Information, the press release shall clearly state that the information communicated is Inside Information and shall specify the subject matter of the Inside Information referable to each event. This implies that the header and the introduction text of the press release should clearly include information of both the events that constitute inside information.

- **Other information**

Only **Authorised Relevant Persons** are permitted to decide on, post or order the distribution of press releases. Authorised Relevant Persons consist of the CEO, the Head of IR or IR Consultant and the Group CFO.

The CEO is ultimately responsible for ensuring that any Catena Group press release that contains Inside Information complies with applicable laws and regulations.

The decision to delay disclosure of Inside Information shall be made by the CEO and shall comply with the requirements and procedures set out in the “*Internal routines and procedures re. delay of disclosure of Inside Information*” document and the *Insider Policy*, as relevant and applicable.

### 6.3 OTHER INFORMATION

In addition to the information that Catena is obliged to publish pursuant to MAR and the Rulebook, the Company may, from time to time, publish and disclose material and information to reinforce the image and awareness of the Catena brand in the press and other media. Such disclosures may either be offered exclusively to select media or be distributed widely by an Authorised Relevant Person. In the case of wider distribution, materials shall primarily be distributed in the morning, no later than 08:30 CET/CEST and as further decided by the Head of IR or IR Consultant or the Group CFO.

### 6.4 FINANCIAL REPORTS AND THE COMPANY CALENDAR

The Company shall publish financial reports in conformity with the disclosure rules laid down in MAR and the Rulebook.

Financial reports shall be produced by Relevant Persons that are members of the management team or work in the financial department and are authorised to produce such reports. In the event that the information is considered Inside Information, the *Insider Policy* shall apply and shall include, but not be limited to, Insiders’ non-disclosure obligations and the Company’s obligation to draw up Insider Lists (as further defined and set out in the *Insider Policy*). Should it become clear during the preparation of a financial report that the information to be included constitutes Inside Information, this information shall, as a main rule, be made public in a separate press release as soon as possible after it has been confirmed. For information on when the disclosure may be delayed, refer to the Company’s internal routines and procedures re. delay of disclosure of Inside Information.

The contents of a year-end report must be sufficiently comprehensive to ensure that the final version of the annual report does not include any new Inside Information. If the media has queries regarding a financial report, the CEO shall be the primary spokesperson. Contacts with analysts and investors shall be handled by the Group CFO and the Head of IR or IR Consultant.

The contents of each report shall be approved by the Board of Directors and disclosed to the public as soon as possible.

Financial reports shall be distributed via an approved news distributor. The news distributor shall ensure that reports are submitted to the Exchange and the Swedish FSA (if relevant). Unless otherwise decided by the CEO, only the CEO, the Group CFO and the Head of IR or IR Consultant are authorised to upload financial reports to Cision.

In immediate connection with the distribution via news distributor, financial reports shall also be published on the Company’s website. The Head of IR or IR Consultant shall ensure that this occurs.

The Company shall publish a **company calendar** listing the dates on which the Company expects to disclose financial statement releases, interim reports, and the date of the annual general meeting. In respect of the annual financial report, the issuer shall publish the week of disclosure.

The company calendar shall be published on the Company's website prior to the start of each financial year.

If a disclosure cannot be made on a pre-announced date, the Company shall publish a new date on which disclosure will be made. If possible, the new date should be published at least one week prior to the original date.

## 6.5 CLOSED PERIOD

Catena applies a prohibition to trade in Catena securities during 30 calendar days before the announcement of an interim financial report or a year-end report, excluding the day on which the report itself is released<sup>4</sup> ("**Closed period**"). The prohibition applies to all Relevant Persons of Catena.

The Group CFO is responsible for sending an email to the Catena Group at least 30 calendar days prior to the publication of the report, excluding the day on which the report itself is released. The email shall clearly state the date and time when the closed period will start and end.

## 6.6 ANNUAL REPORT

The annual report shall be distributed to the market via Cision in the same way as other financial reports. Section 5.4 above shall hence apply *mutatis mutandis* to annual reports.

The Board of Directors shall approve the annual reports prior to publication, and the Company shall strive to publish the annual report no later than four weeks before the annual general meeting.

The annual report shall not contain any new price-sensitive information. Should it become clear during the preparation of the annual report that it is appropriate to include new price-sensitive information, such information shall, as a main rule, be made public in a separate press release as soon as possible after that the information has been confirmed.

## 6.7 ANNUAL GENERAL MEETING

Annual general meetings ("AGMs") and extraordinary general meetings ("EGMs") shall be convened with a notice period of at least 21 days. The notice period shall, in each case, be exclusive of the day on which it is given or deemed to be given and of the day on which the meeting is to be held. The notice convening an annual general meeting shall be published on the Company's website. In addition, the Company shall announce in the Swedish newspaper *Dagens Industri* that a notice to attend has taken place and state the Company's name and registration number, what type of general meeting is to be held, and the time and location of the general meeting.

The time and place of the AGM shall be published on the Company's website no later than at the publication of the third interim report. If possible, the Company should specify that shareholders wishing to submit any request for the general meeting to discuss a matter should do so in advance so the matter can be included in the notice.

AGM documentation shall be provided on the website in sufficient time to allow the Company's shareholders to acquaint themselves properly with the matters that will be deliberated. The deadline for the publication of documentation for the annual general meeting shall be determined in consultation between the CLCO, the Group CFO and the Head of IR or "IR Consultant".

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<sup>4</sup> For example, if a financial report is published on 1 February, the closed period begins on 2 January and ends with the publication of the financial report.

After the AGM, information of any resolutions passed at the AGM shall be distributed in a press release and provided on the Company's website.

No Inside Information may be communicated at any shareholders' meeting.

## **6.8 ANNUAL REPORTING RE. HOLDINGS IN CATENA**

Each of the Company's Board members and the Company's Executive Management shall, in addition to their respective obligation to report transactions related to the Company's shares or financial instruments under MAR and the *Insider Policy*, inform the CLCO in good time prior to the AGM of:

- their holding of shares and other securities issued by the Company and affiliated companies; and
- of any change in such holding.

The Head of IR or IR Consultant shall ensure that the Company's website is updated with information on directors' and the Company's Executive Management's shareholdings no less than annually. The timing of this update shall be no later than the time the annual report is published on the website.

## **6.9 MEETINGS WITH ANALYSTS AND INVESTORS**

Contacts with analysts must be correct and of high quality. Information given at analyst meetings must comply with MAR and the Rulebook.

Questions from analysts or investors that could lead to disclosure of non-public information should be referred to the CFO or Head of IR or IR Consultant. For the avoidance of doubt, Inside Information may never be disclosed at such meetings.

Should inside information be disclosed unintentionally, the information must be publicly disclosed without delay in accordance with MAR.

# **7. ROLES AND RESPONSIBILITIES**

All Relevant Persons are individually responsible for ensuring their compliance with this Policy.

The Group CFO is responsible for reviewing and updating this Policy.

The CEO is the overall owner of this Policy.

The Head of IR or IR Consultant together with Legal and Compliance and HR to ensure that Relevant Persons receive regular training and information on the policy's content and the disclosure requirements applicable to a listed company.

## **7.1 EXTERNAL COMMUNICATION**

The purpose of Catena's external communications is to increase the knowledge about the Catena Group and its operations to facilitate the presentation of the Company in an objective, relevant and correct manner.

### **▪ Spokespersons**

To ensure that Catena's communications are effective and meet all requirements, a limited number of people within the Catena Group shall act as spokespersons. Only those who have been appointed as

spokespersons are entitled to speak for and on behalf of Catena. All spokespersons are obliged to be aware of and comply with this Policy and applicable special disclosure rules. Spokespersons should be media trained.

The CEO and the Group CFO shall hold the primary role of representing the Catena Group in external contexts and making statements for and on behalf of the Catena Group. Other members of the management team and certain Relevant Persons in specialist functions are expected to assume this role as and when needed, as instructed by the CEO or the Group CFO. In special situations, the Chairman of the Board of Directors may speak for and behalf of Catena.

Furthermore, the Company's CLCO has been delegated certain tasks and responsibilities referable to Inside Information and the handling of such information, as further set out in the *Insider Policy* and *Internal routines and procedures are. delay of disclosure of Inside Information*.

In connection with the publication of information pursuant to MAR, the Rulebook or other applicable legislation, as well as at public investor activities, the CEO, the Group CFO and/or the Head of IR or IR Consultant shall act as spokespersons. The Head of IR or IR Consultant shall generally be the first point of contact for incoming requests from investors or journalists. As and when required, it is the duty of the Head of IR or IR Consultant to forward such requests to the appropriate spokesperson, and to support that spokesperson with the wording of messages and other information activities.

In PR activities that do not involve publication of information pursuant to MAR, the Rulebook or other applicable legislation, and which only involve a single market, locally appointed Relevant Persons may act as spokespersons. Such spokespersons are not permitted to make statements on issues that may potentially have an impact on Catena's share price.

**Authorised spokespersons**

<b>Scope</b>	<b>Spokesperson</b>	<b>All media contacts to be made in consultation with</b>
Group-wide information	CEO, Group CFO	Head of IR or IR Consultant
Investor relations	CEO, Group CFO, Investor Relations consultant and Communications	Head of IR or IR Consultant
Local PR	Vice Presidents or General Managers for the respective jurisdictions	Head of IR or IR Consultant

## 7.2 INTERNAL SPOKESPERSONS

Members of the Catena Group management are the primary spokespersons in internal contexts, but they may delegate this role to other Relevant Persons as and when needed. Specialists within the organisation may be instructed by the management team to make statements on certain topics in internal information channels.

For the avoidance of doubt, Inside Information may not be disclosed unless such disclosure is made in accordance with MAR.

## 7.3 EMPLOYEE RESPONSIBILITY

All Relevant Persons within Catena have a certain degree of personal responsibility for communication. Relevant Persons are expected to keep up to date with and take notice of information relating to Catena, to pass it on in a suitable manner when necessary, and to contribute to maintaining market confidence in Catena. Any requests for public statements or statements in the media shall be referred to the appropriate spokesperson.

All Relevant Persons shall notify their immediate superior if they are contacted by the media or if something occurs that may be of interest to the media.

## 7.4 PUBLIC MEETINGS

The following people are authorised to represent and make statements for and on behalf of Catena in public meetings (that is, meetings with a major group of external stakeholders): the CEO, the Group CFO and the Head of IR or IR Consultant or, in special cases, other Relevant Persons to whom such responsibility has been delegated by the CEO, the Group CFO or the Head of IR or IR Consultant.

Any presentation material used at public meetings shall always be approved by the Head of IR or IR Consultant to ensure that communications and visual identity are consistent.

## 7.5 WEBSITE PUBLICATION AND ACCURACY

The Head of IR or IR Consultant, with the support of the CLCO, shall ensure that all communications comply with MAR, the Rulebook and other applicable laws, rules and regulations. The Head of IR or IR Consultant is also responsible for ensuring that the “Investor Relations” section on the website is

regularly updated. The same responsibility for the “Corporate Governance” section is shared with the CLCO.

The Head of IR or IR Consultant shall ensure that information remains on the website during the time period stipulated in MAR and the Rulebook, respectively, and that all required information to the shareholders of the Company is available on the Company’s website.

Website administration and editing may be delegated to a webmaster to ensure effective and prompt changes or updates of the website.

## **7.6 SOCIAL MEDIA PUBLISHED BY THE EMPLOYEE ON THEIR OWN INITIATIVE**

Each Relevant Person is responsible for the content on their own blog, LinkedIn, Twitter feed, webpage or the like. Relevant Persons should remember that they are representatives of Catena when out of office hours as well when publicly discussing and commenting on issues online. Discussions or expressions regarding Catena that would be better suited internally should not be conducted in public spaces as a first choice.

For the avoidance of doubt, unauthorised disclosure or use of Inside Information is prohibited and may constitute a criminal offence under the Swedish Market Abuse Penal Act.

## **8. EXCEPTIONS**

There are no exceptions to this policy.

## **9. REFERENCES TO ASSOCIATED DOCUMENTS**

- The Market Abuse Regulation
- The Rulebook
- Swedish Corporate Governance
- [Insider Policy](#)
- Internal routines and procedures re. delay of disclosure of Inside Information
- [Business Continuity Emergency Contact List](#)
- [Code of Conduct Policy](#)
- [Personal Data Breach Procedure](#)

## Appendix 1 - The Rulebook

**The Nasdaq Stockholm Rulebook for Issuers is available here:**

<https://www.nasdaq.com/market-regulation/nordic/stockholm>

Latest version at the time of updating this policy:

[https://www.nasdaq.com/docs/2024/01/02/Nasdaq\\_Nordic\\_Main\\_Market\\_Rulebook\\_1\\_Jan\\_2024.pdf](https://www.nasdaq.com/docs/2024/01/02/Nasdaq_Nordic_Main_Market_Rulebook_1_Jan_2024.pdf)

## Appendix 2 - Crisis Communications Instruction and Checklist

No.	Activity:	Responsible:	Complete (Time):
1)	<ul style="list-style-type: none"> <li>- Measures to be taken immediately</li> <li>- The crisis management team<sup>5</sup> (the “CMT”) appoints a crisis communication task force consisting of at least one decision maker, one specialist depending on the issue (for example the CLCO), and one communications specialist</li> <li>- Appoint spokespersons and a CMT administrator responsible for keeping the crisis log book</li> <li>- Decide who needs to be informed initially and effectuate (that is, the Board of Directors (the “BOD”), Executive Management team (the “EMT”), Nasdaq, General Managers)</li> <li>- If necessary, contact external crisis communication specialist and/or PR agency for second opinion and either activate them or keep them in a standby mode</li> <li>- Decide on core messages and be consistent</li> <li>- Edit key messages covering what is to be communicated, who says what and what is not to be communicated</li> <li>- Prepare press release for approval by BOD, CEO and/or CMT; keep it brief and factual</li> <li>- Prepare instructions for those functions which are the first to learn about or to be affected by a crisis (if necessary, inform via SMS)</li> </ul>	<p>CMT</p> <p>CMT</p> <p>CMT</p> <p>CEO or Head of Communications</p> <p>Crisis Communications team &amp; CMT</p> <p>Head of Communications and/or external specialist</p> <p>Crisis Communications team/webmaster</p>	<p>15 minutes</p> <p>15 minutes</p> <p>ASAP</p> <p>ASAP</p> <p>ASAP</p> <p>ASAP/20 minutes</p>

<sup>5</sup> CMT consists of C-level management

	<ul style="list-style-type: none"> <li>- Prepare information to be published internally or on the website in addition to a press release if necessary</li> </ul>		ASAP
2)	<p><b><u>Always keep in mind that time is of the essence but</u></b></p> <ul style="list-style-type: none"> <li>- Never comment on rumours or speculation</li> <li>- Never be dishonest</li> <li>- Never remain silent or not available</li> </ul> <p><u>It is not necessary to give immediate answers to all questions.</u> Where it is not possible to answer a question immediately it is perfectly acceptable to say: “We are aware of the situation and we are currently investigating it.”</p>		
3)	<p><b><u>Find out what has happened and act and react systematically</u></b></p> <ul style="list-style-type: none"> <li>- Actively seek information from various sources</li> <li>- Monitor and analyse publicity with help from PR agency</li> <li>- Questions to ask: <u>what</u>, who, why, where and how?</li> <li>- Keep the worst-case scenario in mind and act accordingly</li> </ul>	CMT and crisis communications team	ASAP and throughout the crisis
4)	<p><b><u>What to communicate, to whom and when</u></b></p> <ul style="list-style-type: none"> <li>- Draft a communications plan with key messages, spokespersons, and channels. Update when necessary</li> <li>- As a listed company, the Company needs to communicate internally and externally simultaneously</li> <li>- Discuss with Nasdaq, in case of uncertainty, about what needs to be communicated</li> <li>- Make sure that Relevant Persons, relatives, shareholders, customers and partners receive relevant information when necessary</li> <li>- Include office meetings and authorities if required</li> </ul>	Crisis communications team	ASAP and throughout the crisis
5)	<p><b><u>Send out press releases and/or or updates in different channels</u></b></p>	Crisis communications team and webmaster	ASAP after approval

6)	<b><u>Ensure accessibility to spokesperson in charge</u></b>	Crisis communications team	Ongoing
7)	<b><u>Flow of information and follow up</u></b> <ul style="list-style-type: none"> <li>- Centralise and monitor the flow of information so the CMT is always acting on the best and latest details</li> <li>- Assess media impact of the Company’s message with the help of PR agency and reassess if needed</li> <li>- Continuous reports are to be sent out to CMT, BOD and EMT</li> </ul>	Crisis communications team	Ongoing
8)	<b><u>Crisis communication activities log</u></b>	Appointed CMT administrator	Throughout the crisis
9)	<b><u>Post-crisis follow up</u></b> <ul style="list-style-type: none"> <li>- <u>Mandatory meeting for evaluation, analysis and suggested procedure improvements</u></li> </ul>	CMT, EMT and Crisis communications team	
10)	<b><u>Documents</u></b>		
	<p>Documents that shall be printed or be otherwise accessible at all times, both at home and in the office, are (latest versions):</p> <ul style="list-style-type: none"> <li>- Communications and Disclosure Policy including this appendix (the “<b>Checklist</b>”)</li> </ul> <p>These documents can be found on Confluence</p>		