

# Communication policy

Approved by



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# 1 Introduction

Communication is an important strategic matter for both employees and managers in the group. It is a prerequisite to the involvement of employees that all communication is cohesive and clarifies Knowit's brand, values, and offering.

The overall goal of Knowit's communication is to support the vision and business goals, and to reinforce the image of the Company as a client-oriented digitization partner, and a trustworthy employer.

To instill confidence, we will strive for transparency and speed in all our communication.

As a company listed on NasdaqOMX we will always observe the formal requirements on provision of information relating to financial results and financial position, and information affecting the share price.

Communication, both internal and external, shall be based on Knowit's vision and our shared values:

***Vision: We create a sustainable and humane society through digitization and innovation.***

***Values: Decent, Close, Innovative.***

The general responsibility for all communication and information provision falls on the CEO, along with the CCO and CFO. The ultimate responsibility for all communication falls on the CEO. However, it is important that everyone in the Company feels a joint responsibility to create a cohesive and clear company image.

We strive to always be readily available to contacts from the media, authorities, clients, and employees.

This policy encompasses:

- Market communication and PR
- Internal communication
- Investor relations

Documents related to the Communication policy are Knowit's crisis management plan, which provides guidelines on crisis communication, and our Policy for social media, which provides a framework for and guidance on how our employees should act in social media channels.

## 2 Market communication and PR

### 2.1 Purpose

Our work with market communication and PR is an endeavor to use brand-building activities to reinforce the image of Knowit, and increase awareness about the Company and its operations among existing and new employees and clients, collaboration partners, and society in general.

The objectives are to:

- Reinforce the image of Knowit's employer brand and be the first choice for existing, potential, and former employees.
- Reinforce the image of Knowit as a trustworthy and innovative business partner in strategy, technology, and digitization.
- Reinforce the image in society of Knowit as a sustainable and humane company.
- Establish Knowit as a readily available and natural contact point for the media when matters relating to our industry are being discussed.

### 2.2 Communication channels

- The website
- Trade shows and events
- Job fairs at universities and colleges
- Advertising
- Social media channels (Twitter, LinkedIn, Facebook, Instagram, and YouTube)
- Press releases
- News items and op-eds
- Presentations

### 2.3 Responsibility and spokespersons

The CCO has a coordinating role for all market communication and PR. The responsibility to act as a spokesperson for Knowit's various strength areas falls on the CEO of each respective subsidiary.

All questions from the media shall be referred to the CCO, who will designate an appropriate spokesperson for the specific matter.

## 3 Internal communication

### 3.1 Purpose

All internal communication serves to increase employee knowledge about the Company's operations and create a positive image of Knowit as an employer. Internal communication satisfies each employee's need for objective, true and open information about Knowit's operations and surroundings. Through internal communication, we reinforce cohesion, motivation and create an inclusive workplace where employees feel at home and develop.

Shareit is Knowit's joint intranet and the platform for communication of all information and documents that affect all Company employees.

### 3.2 Communication channels

- Knowit's intranet Shareit
- Internal communication platforms, such as Microsoft Teams
- Social media channels (Twitter, LinkedIn, Facebook, Instagram, and YouTube)
- Corporate meetings (business fields, subsidiaries, and group)
- Newsletters
- Other communication between managers and employers
- CEO meetings
- Introductory days

### 3.3 Basic principles

Knowit's employees always have the right to advance information relating to the Company. This is particularly true when the work situation of employees is affected. However, this ambition cannot always be met, as rules on the stock market regarding a duty to provide information can prevent internal information from preceding external information. Even when such rules prevent the provision information before it reaches external stakeholders, the goal is to provide information to employees at the same time or in direct connection with making information public externally. Planning the presentation of information should be done so that the right of advance information is upheld, whenever possible.

### 3.4 Responsibility

Managers at all levels have the responsibility to communicate within their respective units and ensure that internal communication is fast and efficient. It falls upon them to keep themselves updated on relevant information.

All managers have the responsibility to inform those affected within their own organization. Much the same as managers have the responsibility to inform others, all employees have the responsibility to keep themselves informed. Knowit's culture should be such that employees ask for the information they feel that they need to perform their tasks, and that they take charge of communicating relevant information to others.

## 4 Investor Relations

### 4.1 Purpose

The purpose of Knowit's information to the capital market and investors is to increase knowledge and recognition of the Company and its operations. Capital market relations shall ensure continued financing possibilities through the stock market. The goal is also to increase the interest in the share as an investment opportunity, the number of shareholders, and the trade in the share. This is done by:

- Continuous work to instill confidence in Knowit's management.
- Providing continuous information about the operations to create the conditions for correct valuation of the Company.
- Providing information which supports a stable and accurate share price development.

### 4.2 Target groups

- The Stockholm exchange/Nasdaq
- The Financial Supervisory Authority
- Current and potential shareholders in Knowit
- Financial analysts on the stock market, in Sweden and abroad
- Institutional investors and larger trustees, in Sweden and abroad
- Financial journalists, in Sweden and abroad

### 4.3 Communication channels

- The Company website
- Annual reports and interim reports
- Press releases
- Investor meetings
- Analyst meetings (physical and/or by e-mail/phone)
- Media contacts

### 4.4 Contents and provision of information

Investor relations should be based on mutual trust and continual and correct provision of information. The contacts with investors and the capital market should be continuous and Knowit should endeavor to facilitate comparisons with other companies.

Knowit observes applicable legislation, such as the Companies Act (SFS 2005:551), the Securities Market Act (SFS 2007:528), the Swedish Code for Corporate Governance, Nasdaq Stockholm's Issuer Rules, Nasdaq Stockholm's Rulebook, the Regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse (MAR).

All insider information, i.e., information which is of a specific nature and which has not yet been made public, which pertains to Knowit, directly or indirectly, and which is judged to possibly have a significant impact on the share price, shall be made public without delay. Information which shall immediately be made public at specific information events includes year-end reports, interim reports, statements from general meetings, and changes of the CEO or to the Board.

Examples of other information that may be judged to constitute insider information and must therefore be made public include:

- Acquisition or sale of a company or operation
- Larger investment decisions
- Collaboration contracts or other contracts of greater significance
- Regulatory approvals of greater significance
- The outcome of regulatory reviews of greater significance
- Decisions from authorities or courts
- Changes to the orientation of operations
- Changes to corporate management
- Implementation or changes of incentive programs
- New share issues

All publications shall end with a relevant “legend text,” which depends upon the nature of the insider information. See annex.

#### **4.5 Publication of official reports**

In connection with finalization of a year-end report or initiation of the work to compile a financial report, the CEO and CFO can decide to postpone publication (see below on the conditions for this), with reference to the compilation of a year-end report and other materials ahead of a decision from the Board on publication of a financial report. This postponement need not be communicated to the Financial Supervisory Authority in advance, but is announced when the report is made public. The CFO draws up a list of insiders as of the date of postponement until the time of publication of the report, in accordance with the routines in Knowit’s insider policy.

If the Board’s decision to approve a financial report, which is considered to constitute insider information, occurs outside the opening hours of the marketplace (late afternoon/evening), and the conditions for postponing publication are not at hand (see below on these conditions), it is the current opinion of Nasdaq that publication of the report on the following morning, well ahead of the start of the trading day, can be considered to be encompassed within the wording “as soon as possible.

#### **4.6 Profit warning**

In the case where the financial report or financial position of Knowit significantly deviates from what can reasonably be expected based on information formerly made public by the Company, information of such deviation can constitute insider information and shall therefore be made public as soon as possible. It is Nasdaq’s opinion that in such case, postponing the publication of this information would likely mislead the market. Therefore, immediate communication must be performed (this is often called a profit warning).

If there is uncertainty regarding if the result or the financial position significantly deviates from what can reasonably be expected, the Company shall immediately consult with Nasdaq’s surveillance department and the advisors of the Company.

#### 4.7 Postponement of publication of information

Information with an impact on the market's valuation of Knowit shall be made available to everyone on the market, at the same time and with the same contents. Knowit may, however, postpone publication of insider information, given that all three of the following conditions are at hand:

- a. immediate publication will likely harm the Company's legitimate interests,
- b. it is not likely that postponed publication will mislead the public, and
- c. the Company can ensure that the information remains confidential.

When a decision to postpone publication of insider information is being made, Knowit shall determine if the conditions under items a–c above are at hand. If the publication of insider information has been postponed, this shall, immediately upon the publication of that information, be communicated to the Financial Supervisory Authority. The people who have decided to postpone publication of certain insider information shall inform the CFO thereof. The CFO will compile, in writing, the bases for the decision of postponing publication, and make the communication to the Financial Supervisory Authority when the insider information has been made public. In connection with the postponement of insider information, a list of insiders shall be drawn up in accordance with Knowit's insider policy.

#### 4.8 Availability and spreading of rumors

The CEO and CCO shall endeavor to always be available, especially in connection with reports made, publication of press releases, or when there is current news relating to the company.

Knowit will only comment on analyst reports if they contain factual errors.

If rumors are being spread, the main rule is that Knowit does not comment on rumors. If the rumors are widespread and may be due to a leak regarding an upcoming event, the CEO, CFO, and CCO should jointly consider announcing in a press release that Knowit cannot comment on rumors, or that negotiations are ongoing and that the company will communicate more information within a certain timespan.

#### 4.9 Information that may affect the share price

Publication of information that may affect Knowit's share price shall be handled as follows:

1. Press releases (including interim reports and year-end reports) shall be made public when they are approved by the involved parties (Board, CEO, CFO, CCO).
2. Dissemination of press releases shall be made through an established information distributor (such as Cision) which in an adequate way can satisfy the requirements of broad and simultaneous dissemination to the Financial Supervisory Authority, Nasdaq, the parties on the financial market, and the media.
3. All significant information shall also be published on Knowit's website simultaneously with its distribution.
4. It falls upon the CCO to ensure that relevant financial information, which is not disseminated immediately through the information distributor, is communicated in accordance with the regulation in force, to relevant parties and authorities (NasdaqOMX, the Financial Supervisory Authority) at the time it is made public.



#### **4.10 Responsibility**

The CEO, CCO, and CFO are responsible for investor relations. All communication relating to Knowit's financial position, forecasts, and reported results, or other information that can affect the valuation of the company, must go by way of the Board, CEO/President, CFO, and CCO.

## **Annex to communication policy, regarding wording in press releases**

In publication of information which Knowit is obliged to make public pursuant to MAR, Swedish legislation, or the regulations of Nasdaq Stockholm, a reference to the relevant regulation shall be included at the end of the press release, in a so-called "legend text." The legend text must be adjusted depending on the regulation in accordance with which the information is made public. The following is a presentation of how the text should be worded in the publication of insider information, interim reports, annual reports, share issues/share conversions, and in connection with general meetings.

### **Insider information**

In publication of insider information, the legend text should be worded as follows:

*"The information contained herein is such as shall be made public by Knowit AB (publ) in accordance with the EU Market Abuse Regulation. This press release was made public through the agency of [insert name and title of contact person], at [time] AM/PM CET/CEST on [date]."*

### **Interim reports for Q1 and Q3 and year-end reports**

In publication of the interim reports for Q1, Q3, and Q4, the legend text should be worded as follows:

*"The information contained herein is such as shall be made public by Knowit AB (publ) in accordance with the EU Market Abuse Regulation. This press release was made public through the agency of [insert name and title of contact person], at [time] AM/PM CET/CEST on [date]."*

### **Interim reports for Q2**

In publication of interim reports for Q2, the legend text should be worded as follows:

*"The information contained herein is such as shall be made public by Knowit AB (publ) in accordance with the EU Market Abuse Regulation and the Securities Market Act. This press release was made public through the agency of [insert name and title of contact person], at [time] AM/PM CET/CEST on [date]."*

### **Annual reports**

In publication of annual reports, the legend text should be worded as follows (given that the annual report does not contain any insider information. If it does, reference should also be made to MAR):

*"The information contained herein is such as shall be made public by Knowit AB (publ) in accordance with the Securities Market Act. This press release was made public through the agency of [insert name and title of contact person], at [time] AM/PM CET/CEST on [date]."*

### **Share issues or conversions**

Companies listed on NasdaqOMX Stockholm are obliged to make public any increase or decrease in the total number of shares or votes in the company on the last trading day of the month in which the change occurred. In press releases relating to such matters, the legend text should be worded as follows:

*“The information contained herein is such as shall be made public by Knowit AB (publ) in accordance with the Financial Instruments Trading Act. This press release was made public through the agency of [insert name and title of contact person], at [time] AM/PM CET/CEST on [date].”*

**Notices of general meetings and statements from general meetings**

In publication of a notice to a general meeting and a statement from a general meeting, the legend text should be worded as follows (if the notice/statement does not contain any insider information. If the notice/statement does contain insider information, reference should also be made to MAR):

*“The information contained herein is such as shall be made public by Knowit AB (publ) in accordance with the Nasdaq Stockholm’s Issuer Rules. This press release was made public through the agency of [insert name and title of contact person], at [time] AM/PM CET/CEST on [date].”*