

Information and IR policy

1. Introduction	2
1.1 Objective	2
1.2 Purpose	2
1.3 Updating of the policy	2
2. Information Policy	2
2.1 Internal information	2
2.2 External information	2
2.3 Crisis communication and disaster contingency plan	3
2.3.1 Accident, incident or criminal act	3
2.3.2 Information leakage and rumours	4
3. IR policy	5
3.1 Nasdaq Stockholm	5
3.1.1 Market-moving information	5
3.2 Organisation	6
3.3 Division of responsibility	6
3.3.1 Responsibility of the board	6
3.3.2 The Chief executive officer's responsibilities	6
3.3.3 IR/Finance manager	6
3.3.4 The Business manager's responsibility	7
3.4 Ongoing activities	7
3.4.1 Company general assemblies	7
3.4.2 Periodic financial reporting	7
3.4.3 Issuance of forecasts and forward-looking statements	8
3.4.4 Public disclosures and press releases	8
3.4.5 Selective information	10
3.4.6 Website	10
3.4.7 Direct dealings with analysts, investors and the business press	10
3.4.8 Insider list	11
3.5 Information to Nasdaq OMX Stockholm	11
3.6 Distribution list	11
3.7 Monitoring	11
3.7.1 Shares	11
3.7.2 Media coverage	12
4. Employee communication principles	12
4.1 Insider matters	13

1. Introduction

1.1 Objective

NP3 Fastigheter AB's (publ) (NP3) information must be correct, relevant and clear. Disclosures shall be characterised by transparency and speed. In order to communicate information the right way, an understanding of the needs of the recipient is required, no matter who they are. NP3 disclosures are made in accordance with current legislation, Nasdaq Stockholm's Rules and Regulations for Issuers, the Swedish Corporate Governance Code, NP3's Information and IR policy, NP3's Insider Policy, as well as known recommendations.

1.2 Purpose

- To ensure that all the staff in the organisation have the same viewpoint towards, and realise the importance of, disclosures for the purpose of achieving good and long-term relations.
- To strategically and professionally inform the capital market about NP3, in order to arouse interest in the company.
- To reduce investors' equity risk premiums, which increases NP3's competitiveness in the capital market due to better access to, and prices for, equity and borrowed capital.

1.3 Updating of the policy

The Information and IR policy shall be reviewed at least once a year, and is decided by the board of directors.

2. Information Policy

2.1 Internal information

Internal information refers to disclosures within the company. The target group is the staff as well as the board. All employees have a joint responsibility within the legal Rules and Regulations to keep one another informed about the company's operations in different situations. Experience gained in different areas by the company thus becomes of use to all parts of the company. This is a prerequisite for commitment and the basis for a strong NP3 spirit.

The objective of internal information is to quickly issue information about the company's organisation and operations, about changes and future plans as well as events in the outside world that might affect the company's situation. The atmosphere in the company should be such that it stimulates free and open dialogue between staff in general and groups of employees.

NP3 strives for every employee to have insight into, and understanding of, their own role and importance for joint operations. Every employee should feel that it is obvious that they can always have a say. The goal is open dialogue - at all levels - as to how the NP3 group can become an even better company to work for in the future. Employees are responsible for searching for any information that is needed in different situations.

2.2 External information

External information refers to disclosures to external stakeholders. Among external stakeholders, we have investors, analysts, the media, tenants, suppliers, creditors, competent authorities and

the general public. A high service level should be characteristic of any dealings with the company's stakeholders.

There are rules for, among other things, logotype, font and colours in NP3's profile manual that are mandatory. These rules, along with instructions, tips and more or less ready-to-go marketing products and much more are available on NP3's Intranet.

2.3 Crisis communication and disaster contingency plan

When a crisis situation occurs, the company's readiness to respond is very important. A crisis situation can be, for example, an accident or incident (such as a fire, flood, leak), a criminal act or a leakage of confidential information. The purpose of the disaster contingency plan is for NP3 to have a fully-functional information chain in the event of a crisis situation, in order to quickly prioritise powerful measures and to deal with the situation that has arisen.

2.3.1 Accident, incident or criminal act

An accident is a sudden event that causes injury or death to people, or the destruction of property. An incident is an unforeseen, threatening event that could easily have resulted in an accident. In the event of an accident or incident, a number of questions immediately arise from, e.g. emergency services, the media, tenants and their relatives. It is therefore each business manager's responsibility to ensure that each property's safety procedures, preventive safety measures, risk factors etc., are easily accessible, well-documented and updated in accordance with fire and safety regulations.

At NP3, work environment matters are integrated as a natural part of the company's overall activities, i.e. work environment matters are dealt with as an integral part of daily matters. A basic company principle is to prevent work-related illness and injury.

Examples of situations that can trigger crisis reactions are work accidents and serious incidents, violence and the threat of violence, the death or serious illness of any work colleagues, workplace accidents and job-specific difficulties. If a crisis situation should arise, it is important to follow the procedures set out.

Event

Care for the injured
Alert the ambulance and police services
Give first aid
Accompany those involved to hospital or home
Contact responsible supervisor
Contact relatives
Inform work colleagues
If necessary, notify the Swedish Work Environment Authority
Gather employees

Any dealings with the media

Person responsible

Work colleagues
Work colleagues
Work colleagues
Work colleagues
Work colleagues
Immediate supervisor/COO
Immediate supervisor/COO
COO

Immediate supervisor and CEO
CEO or someone designated by the CEO

If an accident or incident occurs on or in close proximity to any of the company's properties, the person who is first notified about the accident or incident should take the following measures as soon as possible and in quick succession:

- Quickly form an idea of the situation at the accident/incident site. What has happened/is happening? Have the emergency services been alerted? Are there people in the building?
- Alert the police, fire and ambulance services as appropriate.
- Make contact with your immediate supervisor/business manager at NP3 and brief them about the event.
- In the event that they are not reachable, contact NP3's CEO or COO.

In the event of questions from the media, always refer the asker to the emergency services' commanders at the accident or incident site. Statements from NP3's side are only made exceptionally, and in such cases by the CEO or someone designated by the CEO.

In the event of an accident or incident, NP3's insurance company must be contacted as soon as possible. This is done by the Head of Property Management, or someone designated by that person.

2.3.2 Information leakage and rumours

If undisclosed market-moving information, i.e. information where an insider list has been established, should leak to outsiders despite all precautions to avoid this, this information must be made public immediately in a press release, irrespective of the day and date, in order to ensure that all stakeholders on the stock market have access to the same information.

Everyone who has insider information is reminded not to take part in any discussions about such information in the event that they are contacted by a non-insider, and must not make any off the record comments to the media either. If anyone receives a request for information, the answer must be: "I cannot comment but if you give me your name and telephone number, I'll make sure that we get back to you". The CEO must immediately be contacted about any such contacts.

When the leakage is a fact:

1. The person who notices the leakage must immediately contact the CEO.
2. The most likely scenario is that Nasdaq's Trade Surveillance notices the leakage before the company, in which case Nasdaq will contact the CEO. If the CEO knows that he is not going to be available, someone else must be designated as the contact person for IR issues on the website. This only needs to be done however if an insider list has been established, and the CEO is not available.
3. Nasdaq will suspend trading of the stock until all the market players dispose of the same information. Therefore, it is of the utmost importance that a press release about the insider information is made public as soon as possible.
4. The company consults with Nasdaq's Trade Surveillance as to what the press release should include.
5. The company does not comment the event in the media before such a clarifying press release has been made.
6. The board and management are informed before the press release is made public.

NP3's position is that the company does not comment on market rumours or speculation. If however, a false rumour is market-moving, the company may find itself in a position where it has to consider whether it would be appropriate to provide the market with correct information, and thereby create a basis for the correct pricing of stocks, or to prevent any harm to the company.

3. IR policy

The CEO has overall responsibility for dealing with Company information and IR issues on behalf of the board.

3.1 Nasdaq Stockholm

Nasdaq Stockholm has, in addition to a trading venue role, a trade surveillance function. Stock market trading and listed companies' disclosures are continually monitored. Information surveillance involves reviewing and analysing the companies' information disclosures in connection with the year-end report, interim reports and other significant events.

In order to fulfil its market surveillance role, the stock market needs, simultaneously or in advance for exceptional cases (Rules and Regulations 3.4.3), to be given the same information as the rest of the capital market. It is important to realise that public disclosure to the capital market and the disclosure of information to both Nasdaq Stockholm and the Swedish Financial Supervisory Authority (*Finansinspektionen*) are two separate duties that must always be observed, and which serve different purposes.

If in any doubt about submitting information, Nasdaq Stockholm should be contacted in advance in order to discuss the matter with them. Nasdaq Stockholm's personnel have a duty of confidentiality. The CEO contacts Nasdaq Stockholm, so individual members of staff, unless specifically instructed to do so by the CEO, should not be involved in any such dealings.

3.1.1 Market-moving information

As a rule, NP3 must publicly disclose information which, if it was made public, would in all likelihood have a significant effect on the price of company shares (or some other financial instrument). It is therefore not necessary that a real price shift occurs. The assessment of whether any information is market-moving is made by NP3.

When assessing what may be market-moving, the following factors are taken into account:

- The expected scope or importance of the decision in relation to all of the company's activities.
- The importance of the new information in relation to those factors that are decisive for pricing stocks.
- Other factors that could affect the price of any listed shares.

Further grounds for the assessment are if similar information has previously been market-moving, or whether the company has judged certain decisions or events as evidence of insider information on previous occasions. Different handling of similar information must be avoided if possible. This of course does not mean that it is impossible to alter a policy in effect and make a new assessment of similar information at a different point in time. It is important to note that NP3 cannot be exempted from its obligation to publicly disclose insider information to the public by

entering into an agreement with another party, containing clauses that certain information, or details of such information, must not be disclosed to the public by NP3.

Information about decisions, facts and circumstances relating to property transactions must be sufficiently detailed to enable an assessment of the importance of the information for the company, its financial result and situation, or for the company's share prices. With the above as a starting point, the following information should normally be included in a press release about a major, company purchase or sale of properties:

- Purchase price
- Closing date
- Rentable area and occupancy rate
- Average remaining lease term
- Rental income
- Any conditions precedent for the transaction

There may be other events where an information obligation applies, for example:

- Major signed rental agreements or rental termination notices
- Decisions of competent authorities
- Share issues
- Legal disputes

3.2 Organisation

It is of major importance that relations with NP3's target groups are conducted in a consistent and strategic way for the company. This requires that the number of people who may make statements on important and, above all, market-moving matters, are limited primarily to the CEO, and in addition, to the chairperson of the board as well as the CFO. Other employees must have the consent of one of the people mentioned before making any statements.

3.3 Division of responsibility

3.3.1 Responsibility of the board

The Board shall:

1. decide on year-end and interim reports.
2. decide on the annual report.
3. if necessary, decided on the Information and IR policy annually.

3.3.2 The Chief executive officer's responsibilities

The CEO shall:

1. manage any direct dealings with analysts, investors and the media.
2. ensure that press releases with market-moving information are distributed.

3.3.3 IR/Finance manager

The IR/Finance manager shall:

1. propose a full annual plan for NP3's financial reporting, as well as, in liaison with the CFO, ensure that the annual report, year-end report and interim reports comply with the guidelines applicable to production, distribution and content, as set out by the Rules and Regulations in effect.
2. ensure monitoring of NP3's Investor Relations operations in accordance with what has been prescribed.
3. lead internal project teams that prepare, organise and conduct NP3's company general assemblies.
4. ensure that disclosures and reporting to Nasdaq Stockholm are made in accordance with current legislation, Nasdaq Stockholm's Rules and Regulations for Issuers, the Swedish Corporate Governance Code, NP3's Information and IR policy, NP3's Insider Policy as well as known recommendations.
5. assist the CEO so that press releases with market-moving information are distributed.

3.3.4 The Business manager's responsibility

The Business managers shall:

1. inform the CEO in good time with regard to current major events, e.g. major rental contracts in order to facilitate a quick and effective management of press releases.
2. if necessary, manage questions from local media, which are not market-moving issues.

3.4 Ongoing activities

NP3's IR activities can be divided into two groups. Those that are legal obligations, and those that supplement such obligations such that NP3's primary target groups' information requirements are covered. IR activities are summarised in a plan.

3.4.1 Company general assemblies

Company general assemblies shall be held in accordance with legislation and any Rules and Regulations in effect. An internal project team is responsible for the preparation and organisation, as well as conducting company general assemblies.

The date of a company general assembly is announced no later than six months beforehand. The summon to the company general assembly must be made public. The company must publicly disclose information about decisions adopted by a company general assembly.

3.4.2 Periodic financial reporting

A full annual plan for financial reporting in the following year must be drawn up no later than in Q4 and published on the website before the next fiscal year has started. The financial calendar must then be published in its entirety in the year-end report.

The calendar must include:

- Specific dates for the year-end report and interim reports as well as information on which week the annual report is due to be published.
- The date of the annual general assembly.

Annual report

NP3 publish the annual report no later than four months after the financial year has ended. The finance manager is responsible for drawing up the annual report. The printed annual report must only be dispatched to those shareholders who have given their consent to receive it. The Annual report for the fiscal year 2020 and onwards shall be translated to English and be published on the company website in connection with the publishment of the Swedish Annual report.

Year-end report and interim reports

Speed of publication is of major importance. The internal goal is for interim reports, with the exception of the year-end report, to be published no later than 45 days after the reporting period has expired. The year-end report must be published no later than two months after the reporting period has expired. If the dispatch of a report is preceded by a board meeting, the dispatch should be done as soon as the report is adopted by the board, no matter if the board meeting has finished or not. The board can decide to assign the task of issuing interim reports to the company's management. Distribution may then take place as soon as the interim report is compiled. The report design is in accordance with any legislation in effect and current accounting principles, in close collaboration with the finance function. The reports must always have detailed business metrics, and have a consistent appearance to facilitate comparisons over time.

3.4.3 Issuance of forecasts and forward-looking statements

NP3 does not presently issue earnings forecasts and forward-looking statements.

3.4.4 Public disclosures and press releases

Information about decisions or other events and circumstances that are market-moving shall be made public as soon as possible by the company. The company shall make such information public by means of press releases.

Public disclosures by means of press releases must be made according to the distribution list, so as to ensure that all stakeholders on the stock market have simultaneous access to market-moving information concerning the company.

Public disclosures must not take longer than it takes to compile and dispatch the information. The information must therefore be ready to be made public. If a choice or decision is made in the evening or the night, or during the weekend or a public holiday, the information must be made public at the moment that the press release is ready.

It is prohibited to disclose new, market-moving information at a company general assembly or a meeting with analysts for example, if the company has not made the market-moving information public beforehand or does not do so at the same time.

Press releases should also be used for progression and strategic purposes when NP3 wishes to diffuse new information about the company. It is especially important to continually inform the capital market of major specific transactions, as well as, by means of quarterly dispatches, to summarise those activities that were undertaken to reach the company's goals.

Press releases must always contain information on the time and date of issue, NP3's name, details about NP3's website, contact persons and their telephone numbers. The key information must be presented clearly at the beginning of the press release, and each press release must

have a title that summarises the content. The full company name or the abbreviation “NP3” must appear in the title.

Delayed public disclosure

Provided that there are acceptable reasons, the general public does not risk being misled, and NP3 can ensure that the information is not disclosed, it is possible to delay public disclosure of market-moving information. The rules that apply for delaying public disclosure of insider information can be found in NP3’s Insider Policy, which is based on article 17 of Regulation (EU) No. 596/2014 of the European Parliament and of the Council, in which there are mandatory provisions for issuers to make insider information public. According to article 17, the issuer can, under his own responsibility, delay public disclosure of insider information provided that all the conditions in accordance with MAR are met.

Special occasions for public disclosure

In addition to what has been stated in particular elsewhere in the present Information Policy, NP3 must publicly disclose information about:

- Financial reports.
- The date of a company general assembly (must be made public no later than six months beforehand).
- The summon to the company general assembly.
- Decisions adopted by the company general assembly.
- Proposals and decisions that entail that the company’s share capital or number of shares or other share-based securities shall undergo change.
- Proposals and changes concerning the board, CEO, any auditor appointed by the board, as well as major changes to NP3’s management.
- Decisions to implement share-based incentive programs, including the most important prerequisites and terms and conditions of the program.
- Transactions between NP3 and related parties, if the transaction does not qualify as part of NP3’s normal activities, or is of minor importance for the parties involved.
- Purchase or sale of companies or businesses.
- Significant change or change of business to such an extent that NP3 appears to be a new company.
- Decisions about listing on Nasdaq OMX Stockholm, secondary listing on another marketplace, as well as decisions about applications for delisting and the result of any such applications.
- Any information of importance as a consequence of rules or other requirements from another regulated market or marketplace other than Nasdaq Stockholm.
- The company’s calendar (see point 3.4.2) (shall be made public no later than before the start of the financial year).

3.4.5 Selective information

With the exception of the above main rule that NP3 must, as soon as possible and simultaneously – i.e. not-selectively - disclose information publicly, information may, in special cases, be shared before public disclosure with persons who actively take part in the decision-making process, or as a consequence of their professional role, participate in drawing up the information. This can, for example, involve information to:

- major shareholders or potential shareholders when sounding out the market before a planned new share issue.
- consultants that the company has contracted to do prospecting before a planned share issue for example.
- potential bidders or target companies in connection with negotiations concerning a takeover bid
- creditors before an important credit decision or rating institutes for credit assessment

NP3 shall make it clear to the recipient of the information that the latter must treat the information as confidential, and that by accepting the information, they become an “insider”, and therewith are prohibited by law from using it for their own or other’s gain. It is incumbent upon the person giving out information in accordance with this section to ensure that the disclosure is treated in accordance with NP3’s Insider Policy, and in particular that the recipient is added to the relevant insider list. (See Insider Policy)

Information as per above must not be given out without the recipient of the information being bound by a duty of confidentiality. If NP3 gives out market-moving information to an outsider who is not bound by a duty of confidentiality, the information must be made public at the same time.

3.4.6 Website

The website is by far the most important way to communicate up-to-date information to the broadest imaginable target group. The ultimate responsibility for the design of the website and its updating lies with the CEO. Updating must occur as soon as new published information exists. Press releases are immediately accessible on the website, and the property register is updated in connection with the publication of the interim report. Special requirements are set out in the section “Corporate governance”, in accordance with those requirements prescribed in the Swedish Corporate Governance Code, Nasdaq Stockholm’s Rules and Regulations for Issuers, as well as other applicable laws and regulations.

All publicly disclosed information must be accessible on the website for at least five years. Financial reports must be accessible on the website for at least ten years after public disclosure.

3.4.7 Direct dealings with analysts, investors and the business press

NP3’s CEO is responsible for any dealings with analysts, investors and the business press. Any contact with this target group occurs via direct meetings as well as by telephone. In order to effectively diffuse NP3’s messages, the meetings must, irrespective of who arranges them, be held in close timing with the publication of financial reports. NP3’s contact persons must also, at the time of publication of financial reports, be available to take questions by telephone. These contact persons must also, as far as possible, meet individually any analysts, investors and journalists who wish so.

Any dealings in the form of meetings with representatives of the above target groups should not take place at the initiative of NP3 during the month immediately prior to a financial report.

Any dealings with analysts, investors and the business press must not however result in the company disclosing market-moving information selectively.

3.4.8 Insider list

The company must, in accordance with NP3's Insider Policy and legal requirements, maintain an ongoing insider list of persons who have access to market-moving information. Persons included in the list must be notified in writing via the digital logbook Strictlog (see Insider Policy).

3.5 Information to Nasdaq OMX Stockholm

Advance information

If NP3 deems that information that shall be publicly disclosed is expected to be of extraordinary importance for the company and its financial instruments, NP3 must notify the stock market before public disclosure. This applies principally if NP3's business are changed in such a significant way that NP3 appears to be a new company, if the company is preparing a public takeover offer or becomes aware that someone else is planning such a takeover of NP3, or if the company otherwise intends to publicly disclose information that is expected to be significantly market-moving.

The stock market uses this information to monitor share trading in order to detect unusual stock market fluctuations and thereby potential insider dealing. There is no formal regulation for how the stock market should be contacted, but this is usually done by a telephone call to the trade surveillance department.

Advance information to the stock market is not required when it is intended to disclose the new information in a pre-announcement report, as the market is then already aware that the company is going to disclose information at the pre-announced time.

Purchase or sale of own shares

Trading and other regulations on the buying of a company's own shares can be found under point 4.1 in the Rules and Regulations, article 5 of MAR and chap. 19. The Swedish Companies Act.

3.6 Distribution list

NP3 shall maintain an up-to-date distribution list of recipients of press releases, interim reports and annual reports. The distribution list is processed using Cicion tools. The finance manager is responsible for this, as well as for the distribution company having an up-to-date distribution list.

3.7 Monitoring

3.7.1 Shares

NP3's share prices and share turnover must be continually monitored and documented. In the event of extreme market movements, the company's representatives must dispose of as much information as possible as to what is happening, in order to be prepared for questions from the capital market. Shareholder statistics should be produced on a quarterly basis for forwarding to both the company management and the board.

3.7.2 Media coverage

Information in the media can have a major effect on NP3 and the company's market value. NP3's objective is to be informed about articles as well as TV and radio commentaries that are published about the company.

4. Employee communication principles

Major requirements are imposed on disclosures from listed companies. It is especially important that any dealings with journalists, financial analysts, investors (shareholders) etc. are managed in a professional way. NP3's policy on information must be based on transparency and honesty. In order to ensure consistent disclosure, it is required that the number of people who may make statements on important matters is limited.

The CEO and the chairperson of the board are spokespersons for NP3. Employees should contact one of them if:

- they feel unsure how an employee should act in a matter that involves disclosure of information, e.g. when contacted by journalists or shareholders. When an employee is contacted in a matter that involves disclosure of information, the employee should always offer to get back to the person in order to then be able to contact the CEO for advice.
- the employee themselves or someone else has happened to disclose market-moving information to an outsider or unauthorised person.
- the employee perceives that an outsider or unauthorised person possibly has market-moving information about NP3 that has not yet been publicly disclosed.

In addition to becoming familiar and complying with the Insider Policy, and signing a confidentiality and information security agreement, employees in potential disclosure situations should comply with the following advice:

- Do not answer questions directly but offer to call the person back.
- Ask to have questions in writing.
- Do not submit market-moving information to outsiders or unauthorised persons, e.g. journalists, financial analysts, shareholders etc.
- No "off the record" information.
- Do not diffuse internal forecasts or forecast statements to journalists or shareholders, e.g. at meetings with analysts, at any Swedish Shareholders' Association visits, staff meetings or on the Intranet.
- Do not comment forecasts or similar that have been made by, e.g. journalists, financial analysts, shareholders etc.
- Do not comment rumours or speculation when dealing with, e.g. journalists, financial analysts, shareholders etc.
- Always request to read any quotations before publication in order to correct any misunderstandings

4.1 Insider matters

Further communication rules and guidelines concerning NP3 employees, as well as insider information and restricted persons, can be found in NP3's Insider Policy.

Insider information is defined in the Insider Policy as information of a specific nature that has not been publicly disclosed, which directly or indirectly concerns one or more issuers or one or more financial instruments and which, if disclosed publicly, would probably have a major effect on the price of such financial instruments or on the price of associated financial derivative instruments.

Insider Policy stipulates, among other things, that no one who has insider information, irrespective of whether they are an employee, board member or consultant, may, for their own account or for that of another (company, child, spouse, registered partner, co-habitant etc.), by means of trading on or outside of securities market, acquire or dispose of shares or other financial instruments that the information concerns. The same applies to anyone who has insider information and who, by advising, or in a similar way, prompts someone else to acquire or dispose of financial instruments that the information concerns. It is further prohibited to disclose insider information if this does not constitute a normal step in the performance of a service, activity or responsibility.