

Information policy

Approved by Soltech Energy Sweden AB's Board of Directors on May 21, 2024.

This report has been prepared in both Swedish and English versions. In case of variations in the content between the two versions, the Swedish version shall govern.

1. Generally

Soltech Energy Sweden AB (publ) (the "Company") is a public company whose shares are traded on First North at Nasdaq Stockholm (the "Trading Venue"). The company must comply with the rules that apply at Handelsplatsen, as well as other applicable laws and regulations that apply to public limited companies in Sweden. This information policy aims to ensure a good quality of both internal and external information, as well as compliance with laws, regulations and agreements.

The Company's policy for communication and information is designed to ensure that the Company has a good quality in these respects. The policy applies to all employees of the Company and can be summarized as follows: The Company's communication shall be correct and clear. It should be easy to find and obtain information for employees internally, external stakeholders and for other interested parties. Qualitative information, which shall never be ambiguous or misleading, shall be a guideline for the Company. Incorrect information must never be communicated. Difficulties and problems should be properly highlighted along with the measures taken to solve them. It is important that the person acting as the informant is available on request. The communication from the company must be in Swedish.

2. Application

The information policy covers all external communication, including the website, press releases and financial reports as well as oral information at meetings/conversations with analysts and investors, interviews with the media, etc.

3. Tools for communication

The company's tools for external communication can be:

- Press releases
- Interim reports
- Year-end reports
- Annual reports
- Company website
- Printed information material
- Electronic presentation material
- Responding to inquiries by phone, email, etc.
- Analyst contacts and personal contacts
- Social media posts
- Moving media

4. Responsibility

Communication activities are an important policy instrument and thus a responsibility for management. The company's CEO is ultimately responsible for when, how and what information may be disseminated by whom in the organization.

Communication responsibilities are shared between different people in the organization. The main principle is that the person who is best suited to answer a question is also given the responsibility to do so. In general:

The company's CEO represents the company in company-wide matters, such as financial position, business strategies, market and competitive assessments. In addition, the company is also represented by the Chairman. Other employees should not comment other than in general terms and then about facts and conditions that are already known externally.

Ownership issues are referred to the CEO or the Chairman of the Board.

4.1. Subsidiary

The CEO of subsidiaries is responsible for informing customers, the market and the general public as long as the information is not regarded as price-influencing inside information for the parent company. Subsidiaries of the Company do not communicate with the media without the approval of the Company's CEO.

5. Duty to provide information

A basic prerequisite for independent analysis of the Company's operations and value is that all stakeholders are given the opportunity to access the same information from the Company at the same time. In accordance with Handelsplatsen's rules, the Company must disclose information in a non-discriminatory manner.

Assessing what constitutes inside information may be decided on a case-by-case basis and in case of doubt, the CEO or the Chairman shall contact the Company's CA or Handelsplatsen's corporate monitoring for advice. During ongoing trading, this means that the publication should not take more time than is required to compile and distribute the information. This requires good planning, i.e. that a draft press release has been decided (however, the provision does not mean that the information must be provided during the current board meeting). If an election or decision takes place during the evening or night time and there is no trading in the Company's shares on any other marketplace, the announcement shall be made the following morning well in advance of the opening of the Trading Venue. This assumes that those who know the information are informed to apply strict confidentiality in the meantime.

The First North Nordic Rulebook, section 4.1 provides guidance on the handling of inside information and what is to be considered as such. It mentions, for example, that the Company must publish as soon as possible any decision and circumstance concerning the Company that may have a material impact on the Company's share price.

If an event occurs outside the Company's control, the Company shall inform about the event as soon as possible.

In order to ensure as fair a distribution of the information as possible when material inside information is to be disclosed to the market during ongoing trading, the Company's CA shall be contacted in advance by the CEO or CFO. According to Handelsplatsen's regulations, information that

is not insignificant in nature likely to affect the valuation of the Company's shares may not be disclosed in any other way than through public disclosure. For example, there is a duty to provide information in the following situations:

- Major acquisitions or divestments of companies or businesses
- Major orders or investment decisions
- Issue decision
- Notice of General Meeting/Annual General Meeting and publication of resolutions taken at such meeting.
- Resolution on incentive program
- Resolution on offer to subscribe for new shares
- Change of marketplace for trading in the company's shares
- Unexpected changes in earnings
- Major credit or customer losses
- Material transactions with related parties
- Cooperation agreements or other agreements of major importance
- Significant decisions of an authority or court
- Forecast adjustments
- When receiving an audit report, the contents of such a report shall be published as soon as possible
- Changed business direction

The trading venue's regulations also mean that certain ongoing information is mandatory to publish, this applies:

- Year-end report, as soon as the Board of Directors has approved prel. Financial statements
- Interim reports (half-yearly reporting requirements)
- Resolutions at the Annual General Meeting
- Changes in the Board of Directors and change of CEO, senior executive, Certified Adviser or auditor.

What is otherwise referred to as not insignificant significance may be decided by the Company's management on a case-by-case basis. If in doubt as to whether information should be made public, the Company's CA shall be contacted for advice.

The company may postpone the disclosure of inside information provided that:

- immediate disclosure is likely to harm the legitimate interests of the publisher
- Deferred publication is not likely to mislead the public
- The issuer can ensure that the information remains confidential.

These decisions must include a justification for the way in which any of the points above are met. The decision is then preserved in written format.

When the company has postponed the disclosure of inside information and then makes it public, FI must be informed of this immediately. At FI's request, the company must also provide a written explanation of how the conditions for the deferred disclosure have been met.

5.1. Advance information to CA and Handelsplatsen

Certain situations require the Company to inform Handelsplatsen and the Company's CA prior to an official statement, or an upcoming event. For example, but not limited to:

- Request from the Company's auditor regarding situations that may be of significance for the valuation of the Company's share
- Preparations for a public offer to acquire shares in another listed company
- Information that another company is planning a public offer to acquire shares in the Company
- Adjustments in forecasts or other unexpected changes in financial results or position
- Delayed press releases
- Ahead of a planned new share issue, split, name change and similar events

5.2. Obligation to contact the Company's Certified Adviser and/or marketplace

In accordance with section 4.8 of the First North Rulebook, the Company shall always contact CA or the marketplace in certain situations, such as:

- Criticism is made against the Board of Directors or the CEO by the Company's auditor
- Circumstances that may cause for suspension of ongoing trading in the Company's share
- Circumstance giving rise to postponement of disclosure of inside information
- If the Company intends to disclose particularly important information, the Company's CA and the marketplace shall be contacted as soon as practicable
- If the company intends to apply for delisting of a listed instrument, the marketplace must be contacted as soon as possible

5.3. Insider list

Inside information should be kept within as narrow a group as possible. Inside information that is leaked can both seriously damage the issuer's business, and result in unauthorized trading in the issuer's financial instruments.

Issuers that have applied for or approved the admission of their financial instruments to trading on a stock exchange, or an MTF, shall therefore maintain a list of persons who have access to inside information on an ongoing basis. It is called an insider list. Provisions on insider lists are set out in Article 18 of the Market Abuse Act ("MAR").

The purpose of the provisions is partly to facilitate investigations of illegal insider trading and partly to prevent persons with inside information from using the information for their own or others' gain. The insider list also provides an instrument for the issuer to gain control over the persons holding specific inside information.

The insider list shall:

- contain all the persons who have inside information at any given time. This applies to employees of the issuer or persons who otherwise perform tasks on behalf of the issuer
- be divided into separate sections for each insider event;
- updated as soon as conditions change and without delay
- be drawn up in electronic format
- Be retained for at least five years from the date it was created or five years from the date it was updated
- comply with the format requirements laid down in Commission Implementing Regulation (EU) 347/2016.

Permanent insider list

In order to avoid multiple entries relating to the same persons in different sections of the insider lists, the issuer may establish and update an additional section of the insider list, referred to as the section on persons having permanent access to inside information. This list shall only include persons who have access at all times to all inside information held by the issuer.

Insider list maintained by a party other than the issuer

If another person acting on behalf of or on behalf of the issuer undertakes the task of preparing and updating the insider list, the issuer remains fully responsible for compliance with this Article. The issuer shall always have the right of access to the insider list.

Information

Issuers or persons acting on their behalf or on their behalf shall take all reasonable steps to ensure that all persons appearing on the insider list confirm in writing that they are aware of the legal obligations imposed by Article 18 and the sanctions applicable to insider dealing and unlawful disclosure of inside information.

5.4. Insider information management

Employees within the Company shall comply with the internal confidentiality requirements that have been established to prevent the dissemination of undisclosed inside information. A logbook is prepared by the CFO if necessary. The logbook contains information about potential inside information, as well as the date and time when the person entered in it was notified of the information.

For external consultants and partners who have access to undisclosed inside information, confidentiality agreements must be drawn up.

5.5. Unexpected significant changes in earnings

If the Company observes that the Company's earnings development during a quarter deviates materially, upwards or downwards, from the picture of the Company's situation created by previously published information, this shall be made public.

In cases where the "unexpected significant change in earnings" can be assumed to have a significant effect on the share price, the company's CA and Handelsplatsen shall be notified in advance.

6. Routines

It is the board that is responsible for ensuring that the information policy is followed. The Board delegates to the CEO to handle practical matters so that the rules regarding the insider list are complied with.

6.1. Distribution

The CEO is responsible for ensuring that inside information in the form of press releases, interim reports and annual reports is published without delay in a non-discriminatory manner to the public.

An established electronic news distributor is used for distribution, which ensures that Handelsplatsen, the media and the public can simultaneously access published information without delay.

6.2. Press releases

The most important information must be clearly placed at the beginning of the press release, it must be a clear headline that adequately reflects the content, the name of the CA must always be included, as well as contact information for the person responsible at the company. Press releases containing inside information must be labelled as such, etc.

If it is a press release that publishes information that is published in accordance with the provisions of the Act on Market Impact Information ("MAR"), a text about this must be included.

- Significant business deals or other inside information received by the Company or its subsidiaries will be published as a press release by the Company. Information about the customer's identity and scope is provided to the greatest extent possible, unless otherwise agreed with the customer.
- The CEO is responsible for the compilation and distribution of press releases, interim reports, year-end reports and annual reports.
- Interim reports and year-end reports are also published as press releases.
- Notice of the Annual General Meeting shall be published through a press release. The company shall, as soon as possible after the conclusion of the general meeting, publish a communiqué with information on significant decisions taken at the general meeting.

6.2.1. Financial statements

Financial reports are prepared by the company's CFO in consultation with the CEO. The CEO is responsible for ensuring that reports are communicated in accordance with the Company's financial calendar, which is updated on an ongoing basis. The accounting complies with the IFRS standard. The CEO ensures that notices of general meetings are sent out in due time and follow the formal rules of the articles of association regarding notice periods, etc.

6.2.2 Social media

The company's CEO has to appoint a person who is responsible for any external communication in social media and who has the relevant skills to do so in a satisfactory manner. This person must continuously report to the CEO on any complaints in these media about the Company's communication. The CEO ensures that the staff is informed that social media posts may not be made that relate to the Company, its operations or other persons active in the Company without the specific consent of the Company's CEO.

6.3. Contacts

All communication with the financial market and media on behalf of the Company is done exclusively through the Company's CEO, CFO and the Chairman of the Board. Other employees and executives within the Company who are contacted by investors, shareholders, analysts or the media should always refer directly to the CEO, CFO or the Chairman of the Board without further comment. Subsidiaries of the Company do not communicate with the media without the approval of the CEO.

6.4. Company website

The CEO is responsible for the Company's website. The website is updated with the necessary information according to the requirements of the marketplace. On the website, press releases, financial reports, information from the general meeting, the articles of association, insider transactions and ownership and contact information shall be published. The website shall also contain information about the Board of Directors, the CEO, the auditor and information about the upcoming General Meeting. The CEO is responsible for ensuring that the website contains up-to-date and correct information. The website is www.soltechenergy.com.

6.5. The company's staff

Personnel of the Company who, due to their position, have received inside information may not, before the information has become public knowledge or ceased to be of significance for the price setting, buy or sell such financial instruments on the securities market. Nor may the information be used to induce anyone to buy or sell of this kind by advice or in any other such way.

6.6. Trading in the Company's securities

When trading in the Company's securities, the board member, deputy, auditor, deputy auditor and all employees of the Company or its parent company and related parties to such persons shall comply with the "thirty-day rule". This means that the persons concerned may not trade in shares or other financial instruments in the Company 30 days prior to the publication, including the reporting date, of ordinary interim reports. Notwithstanding the Thirty Day Rule, the following may be granted:

- Shares are divested in accordance with the terms of a public offer to purchase shares,
- Disposal and exercise of allotted issue rights and redemption rights as well as other similar rights such as conversion rights.

Furthermore, all employees of the Company are entitled to:

- Before trading takes place in the Company's share, approval must be obtained via email from the CFO or CEO. CFO/CEO assesses whether there is inside information in the company
- Share can be sold no earlier than 30 days after purchase

And for board members, deputies, auditors, deputy auditors, the following applies:

- Before trading takes place in the Company's share, in addition to complying with applicable regulations, inform the entire Board of Directors, the CEO and the CFO in writing
- Always act for the company's long-term value creation and report the reasons for any sale, in writing to the entire board. This motivation may also be published if necessary, following a decision by the Chairman in consultation with the CEO.

7. Policy on Selective Information

The trading venue's rules have a general prohibition against selective information: "Information that is not materially likely to affect the valuation of the Company's listed securities may not be disclosed except in special cases in any other way than through publication."

Exceptionally, in special cases, undisclosed potentially price-influencing information may be disclosed to third parties (selective information) without it being made public at the same time:

- Information to major shareholders or intended shareholders in connection with soundings prior to a planned new share issue,

- information to advisors that the Company engages for e.g. prospectus work prior to a planned issue or other transaction of a larger scope,
- the intended bidder or target company in connection with negotiations on a takeover bid;
- Information requested by rating agencies prior to credit rating or
- Information about investment plans and expected profitability development prior to important credit decisions.

The possibility of making exceptions shall be used with great restrictiveness and with constant consideration as to whether the requested information is needed for the purpose. If the information is provided selectively, it should normally be possible to make it public at a later stage in order to revoke the "insider position" of those who received the information.

The Company shall make it clear to the recipient of the information that he or she must treat the information as confidential and that by receiving information he or she becomes an "insider" and is thus prohibited by law from using it for his own or others' gain. The company must also carefully keep records of who has been given access to the selective information, the time and what the information was about in a logbook (see the section on insider list above).

In particularly sensitive cases, a confidentiality agreement must always be drawn up with the recipient of the information.

7.1. Public Offer Policy

If preparations are underway within the Company to make a public offer to a wider circle to acquire shares or comparable financial instruments in another listed company, the Company shall immediately notify Handelsplatsen's corporate supervision and CA when there is reasonable cause that the preparations will lead to a public offer. A logbook must then be kept.

If the Company has been notified that another party intends to make a public offer to the Company's shareholders to acquire shares or equivalent financial instruments in the Company, and this has not been made public, the Company shall immediately notify Handelsplatsen's corporate supervision and CA thereof that there are reasonable grounds to believe that the plan will be realized.

In the case of major acquisitions, disclosure is subject to extensive regulations.

8. Acting in the event of unforeseen events, information leaks and rumours

If the Company has become aware that inside information may have been leaked to third parties and if disclosure is not possible, Handelsplatsen's corporate monitoring and the Company's CA shall be contacted immediately. If the circumstances on which the information that has begun to be disseminated can be made public, this must be done as soon as possible.

A "leak message" should be prepared to be able to quickly handle such a situation that requires quick action. The company's policy is never to comment on rumours or the like.

8.1. Crises

During a crisis situation or in the event of negative publicity, it is always the CEO and/or the Chairman of the Board of Directors of the Company who decides on the media strategy. The trading venue and the Company's CA for the Company should be contacted for advice.