

## INFORMATION AND COMMUNICATION POLICY CTT SYSTEMS AB

Please note that this is a translated version from the original policy in Swedish. It may therefore contain minor inaccuracies. The original Swedish version can be found at <a href="https://www.ctt.se">www.ctt.se</a>.

CTT's external financial information and investor relations (IR) shall be open, reliable, accessible and swift. Quality should be the guiding principle, but release of the information should also be cost effective. The information should meet the demands set by the market place and common practice.

#### **External information**

All employees owe a duty of confidentiality regarding business- and product related information that has not already been disclosed in Annual Reports, Interim Reports or press releases. Only the CEO, CFO and Chairman of the Board have the right to communicate externally regarding CTT's business and financial situation, as well as making clarifications about already disclosed material. CTT's Vice President and the Sales Director both have the right to communicate externally regarding specific orders, sales and other sales related activities.

#### **Media contacts**

Only the CEO, CFO and Chairman of the Board have the right to communicate externally regarding CTT's business and financial situation (in accordance to the Stock Exchange rules & regulations, and current CEO rules of conduct established by the Board). CTT's Vice President and the Sales Director both have the right to communicate externally regarding specific orders, sales and other sales related activities. Questions from share holders, media etc shall be canalized to above mentioned individuals.

### Contacts with shareholders and capital market players

Contacts with shareholders and other capital market players should be held by CEO, CFO or the Chairman of the Board.

CTT shall in an active, serious and reliable manner inform the capital market and other stakeholders. The CEO decides which amount of resources is motivated from case to case.

At very special occasions, not yet externally disclosed information can be communicated in a selective manner, e.g. in the planning of a rights issue, in negotiations of company acquisitions or in contacts with rating institutes. The receiver of the information shall then be informed that the information is confidential, and that the receiver therefore is classified as an insider. In these cases, an Insiders log will be kept in accordance with current regulations.

### Distribution of press releases and financial information

Interim reports and other external financial information is disclosed in accordance with the current stock issuer contract. This is done using Cision (or equivalent) information distribution services.

The purpose is to create a just and reliable base for the capital market assessment of CTT, by the immediate disclosure of all material agreements, actions or decisions that can affect the valuation of the CTT shares.

The disclosure or non-disclosure of information should be an assessment of the obligation to immediately disclose information to shareholders and other stakeholders, the right to delay disclosure for commercial or other reasons, and the obligation of equal treatment of all shareholders and other stakeholders. The risk of selective information giving shall always be assessed in respect to the current rules of market abuse. All press releases and equivalent externally disclosed information shall be approved by the CEO, CFO or the chairman of the Board. Annual General Meeting and other General Meeting invitations are published in Post- och Inrikes Tidningar and Svenska Dagbladet in accordance with the articles of association.



### Homepage

CTT's homepage shall fulfill the demands of the Stockholm stock exchange, but also contain information that can be expected by a publicly traded company with international operations.

# Policy regarding rumours and information leaking

The CTT policy is not to comment on rumours regarding the company or specific business transactions. The CTT response to rumours is always "no comment", unless the Stock exchange rules and regulations states otherwise.

CTT shall at all levels handle sensitive information in a way that the risk of "leakage" is minimized. Only when the spreading of rumours can be considered as harmful for the business, the company can choose to disclose clarifying information. When an essential corporate event is imminent, or if such event can be expected to occur, the management always strive to prepare a press release (or equivalent) in advance for immediate disclosure when or if such an event occurs.

The above information policy is decided by the Board of directors in CTT Systems AB on August 28<sup>th</sup> 2007, with the latest update approved by CEO December 30<sup>th</sup> 2020.

# Personnel at positions mentioned in this Information Policy, as per latest approved update stated above:

Torbjörn Johansson, CEO Daniel Ekstrand, CFO Peter Landqvist, VP Sr Advisor Sales Ola Häggfeldt, Sales Director Tomas Torlöf, Chairman of the Board www.ctt.se är CTT´s hemsida.

Nyköping, 2020-12-30	
Torbiörn Johansson, CEO	