

DOCUMENT NAME

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INFORMATION POLICY

Adopted by the board 2023-05-04

1. BACKGROUND

This information policy regulates the Image Systems Group's disclosure of information, e.g. in the light of the requirements prescribed by the Stockholm Stock Exchange. The information policy is a mandatory set of rules, which must be followed by everyone within the Image Systems Group. Image Systems therefore refers to both Image Systems AB and the subsidiaries that are part of the Group.

2. MAIN PRINCIPLES

Image Systems' provision of information shall be characterized by an open, clear and distinct communication with all actors and stakeholders. The goal is to promote Image Systems' operations through well-functioning communication.

In the external information provision, Image Systems shall:

- 1. provide essential information in a timely and accurate manner
- 2. ensure the reliability of the information by maintaining specific channels and routines for communication
- 3. meet the requirements of law, regulation or listing agreement and observe current stock market rules and good practice
- 4. treat all stock market players and stakeholders equally

3. APPLICATION

The information policy applies to all employees and board members of Image Systems, as well as all others who are in some way connected to Image Systems. It includes all external communication, including the website, press releases, business magazines and financial reports as well as oral information at meetings / conversations with analysts and investors, interviews with the media , etc.

4. RESPONSIBILITIES AND RIGHTS

The CEO is responsible for providing information from Image Systems. The CEO is responsible for ensuring that Image Systems fulfills its information obligation in



accordance with applicable laws, ordinances and stock exchange rules, and otherwise follows good practice in the stock market.

Image Systems is an open company that respects the constitutionally protected freedom of expression with regard to each individual's right to express an opinion on matters that concern him or her personally. In matters concerning Image Systems' business conditions and operations, however, only the respective management has the right to comment on behalf of Image Systems. All inquiries about Image Systems' conditions and operations must therefore be referred to the local company management or group management.

All external information concerning conditions within Image Systems, which may affect the development of the share price, shall normally be provided by the CEO. Inquiries from analysts, national media, etc. should therefore primarily be referred to the CEO.

The subsidiaries' right to externally disseminate information about their own operations is regulated in section 11 below.

5. PUBLICATION OF INFORMATION

The listing agreement with the Nasdaq Stockholm Stock Exchange stipulates, as a general rule, that all agreements, events and decisions of not insignificant importance must be published immediately. This means that information that may affect the assessment of the company and thus the valuation of the company, or change the image of the company that previous information has created, must be published immediately.

Examples of such information are:

- 1. Major acquisitions or sales of companies or businesses
- 2. Important order after assessment by the company. An important order can include significant orders in terms of amount or a completely new type of sale.
- 3. Unexpected changes in earnings or forecast adjustments (if forecast published)
- 4. Cooperation agreements or other agreements of major importance
- 5. Larger credit or customer losses
- 6. Significant government or court decisions
- 7. Changed business orientation

The listing agreement also means that certain current information is mandatory to publish, this applies to:

- 1. Year-end report
- 2. Interim reports
- 3. Issue decision
- 4. Resolution at the Annual General Meeting



5. Changes in the board and change of CEO (and other key people) and change of auditor elected by the AGM

What is otherwise meant by the listing agreement's concept of not insignificant significance may be decided by Image Systems' Group Management on a case-by-case basis. In case of doubt as to whether information should be published in accordance with the listing agreement, the Stockholm Stock Exchange's Information Monitoring should be contacted for advice.

5.1 How should publication take place?

Information that is judged to be not insignificant as above, shall be published through a broad and simultaneous dissemination in accordance with the provisions of the listing agreement. The dissemination must be done via an established information distributor, who can fully meet the requirements for broad and simultaneous dissemination to the stock exchange, financial market players and the media.

5.2 When should publication take place?

Significant information must be published in direct connection with the decision being made, the choice taking place or the event becoming known to Image Systems. In the event of incidents beyond the company's control, the disclosure of information shall take place as soon as possible after evaluation of the incident. Such information shall also include the expected effect of the event on Image Systems.

Publication of inside information must be provided with a so-called MAR label. When a company publishes a financial report that contains inside information, the press release must refer to MAR with a MAR label. If the report does not include inside information, the press release should not refer to MAR. Financial reports in the form of interim reports and year-end reports are always considered to contain inside information. However, the annual report must not contain inside information.

Type of information other than inside information shall, where applicable, be provided with another reference, such as in certain cases a reference to the Securities Market Act.

5.3 Deferred publication

If the Board of Directors or the CEO considers that publication of certain information could harm the company, a log list must be drawn up and reasons for the postponed publication must be noted in writing and who decides on the postponed publication. It must be possible to submit the documentation to Finansinspektionen on request. It is the CEO's responsibility to ensure that information is not disseminated during the time when the information is not public.

5.4 Exceptions from broad and simultaneous information provision

On very special occasions, Image Systems may need to disclose information selectively, without publishing it at the same time. This can e.g. apply

- 1. information to major or prospective shareholders prior to the planned new share issue
- 2. information to creditors prior to important credit decisions
- 3. information to advisers prior to a planned issue or major transaction
- 4. other information that is necessary for the company's operations and development
- 5. Decisions on such information are made by the company's board and / or CEO. The recipient of the information shall be clarified that the information shall be treated as confidential and that the recipient through the information is covered by the stock exchange's insider rules. The recipient is thus prohibited from using the information on his own or someone else's behalf.

In such selective information provision, Image Systems' management must keep accurate notes (logbook) about who gets access to what and at what time. In some sensitive cases, it may also be appropriate to establish a confidentiality agreement between the parties.

5.5 Information via Image Systems website

In connection with the dissemination via external channels, all essential information must be published immediately on Image Systems' website www.Image Systemsgroup.se. Prior to publication, it must be ensured that the information has been published in accordance with the first paragraph in 5.1 above.

The website must also have such general information material as e.g. is used in the presentation of the company's financial reports for analysts and others.

All information published by Image Systems for at least three years must be available to visitors on the website.

Financial reports from Image Systems must be available on the website at least 10 years after publication.

6. CONTACTS WITH ANALYSTS, MEDIA ETC.

Image Systems' Group Management shall continuously work to develop and improve the financial information regarding Image Systems, in order to give both current and future owners good conditions to value the company in as fair a manner as possible. This includes i.a. to actively participate in meetings with analysts, stock savers and the media.

On such occasions, however, information may not be disseminated for the first time . If it is deemed important to touch on not insignificant new information at such an occasion,



identical information shall be disseminated at the same time via Image Systems' ordinary information channels in accordance with 5.1 above.

If price-affecting information is accidentally provided on such an occasion, the same information shall be disseminated immediately in accordance with 5.1 above.

Information may never be provided selectively in advance of an upcoming news item. This applies even if the recipient of the information promises not to publish it before Image Systems' publication.

7. ACTING ON RUMORS AND INFORMATION LEAKS

Image Systems' main principle should not be to comment on speculation or rumors in the market. Should an information leak occur, it will no longer be possible to maintain this principle. However, the distinction between a rumor and an information leak is difficult to make. Therefore, any action must be preceded by careful consideration by Group management.

In the event of prolonged confidential preparation of major and for Image Systems' significant activities that are likely to affect the share price, an information preparedness must be in place in preparation for any information leakage.

8. PRODUCTION OF PRESS RELEASES

The listing agreement requires that not insignificant information be published immediately and with a broad and simultaneous dissemination. This requires foresight on the part of Image Systems and, as a general rule, press releases must be prepared so that they can be published immediately after a decision has been made or the event occurs.

The CEO is responsible for ensuring that press releases at Group level, containing information that is of such a nature that it can affect the assessment and valuation of the company, are correct. Each press release states who Image Systems's contact person is due to the published information. This contact person (s) must be available by telephone in connection with the publication of the press release. See also below: 11. Non-group information

9. PREPARATION OF INTERIM REPORTS, YEAR-END REPORT AND ANNUAL REPORT

Image Systems shall prepare interim reports, year-end reports and annual reports in accordance with laws, regulations and stock exchange rules, and in accordance with good stock market and accounting practice.

Responsibility for the preparation of interim reports, year-end reports and annual reports is the responsibility of the CEO, who is also responsible for ensuring that they meet the listing agreement's requirements for content and design.



Interim reports and year-end reports are communicated to the stock market and published on Image Systems' website immediately after the Board's approval. The annual report is published on Image Systems' website.

The annual report may not contain new, not insignificant information. If it is judged that such information should still be included in the annual report, the information shall be published in accordance with 5.1 above before the distribution of the annual report. By definition, the information is thus no longer new.

10. ANNUAL GENERAL MEETING

The planning and implementation of the Annual General Meeting shall take place in a manner that meets legal requirements, the requirements of the stock market and the provisions of the listing agreement. No new, not insignificant information may be provided at the Annual General Meeting. Should such be inadvertently provided, identical information shall be disseminated immediately via Image Systems's regular information channels in accordance with 5.1 above.

11. NON-GROUP INFORMATION CONCERNING SUBSIDIARIES

In accordance with Image Systems 'decentralized culture, the Group's subsidiaries have the right to disseminate information about their own operations through press releases, Image Systems' website, interviews with local media or through other local channels. Such information shall relate to the own subsidiary and may not be of such a nature that it is likely to affect the valuation of the Image Systems share in accordance with section 5 above.

The subsidiary's CEO is responsible for providing information in these cases. Before selfinitiated activity, the Group's information resource must always be contacted for advice on the design, content and choice of channel.