

# BUFAB GROUP POLICY

## Communication

**BUFAB**

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### 1. Background and purpose

This Communication Policy aims to help the Bufab Group, referred to as Bufab, provide high-quality information both internally and externally. The Policy describes how Bufab should consistently and uniformly interact with the media and investors and provides a framework for organising the company's communication.

This policy also contains certain practices related to handling inside information. These procedures are complementary and subordinate to the rules on handling inside information contained in Bufab's Insider policy.

The policy is an internal manual for how Bufab's communication activities should be conducted and supports routine day-to-day procedures, planned decisions, and sudden events.

### 2. Audience

This policy applies to all Bufab companies, subsidiaries, employees, and consultants. It outlines Bufab's external and internal communication principles to ensure it is executed correctly, coordinated, efficiently, and professionally. Bufab's Insider policy covers issues related to inside information.

Bufab's Insider policy outlines the responsibilities of employees and directors regarding inside information, insider trading, trading restrictions, and related matters.

All employees and board members must adhere to this Policy and relevant directives in both internal and external communications.

### 3. Policy statement

Bufab emphasises the need for clear, professional, and inclusive communication. All employees should ensure that their communication is respectful, concise, and aligned with the company's values. Confidential information must be handled responsibly and shared only with authorised individuals. Proper communication tools are important to maintain a productive work environment. Always adhere to legal and ethical standards when representing the organisation. Non-compliance may result in disciplinary action.

### 4. Introduction and purpose

Bufab is listed on Nasdaq Stockholm. This policy ensures that all internal and external communications by Bufab comply with legal requirements, the Articles of Association, the Nordic Main Market Rulebook for Issuers of Shares, and the Swedish Corporate Governance Code. Essential provisions are included in the policy to assist in applying these rules.

Accurate and effective communication requires cooperation, coordination, and clear delegation of responsibilities within the company. All communication activities must align with the policy. It is crucial to consider how any distributed information may impact Bufab as a whole. All employees should be familiar with the responsibilities set out in this policy, and each subsidiary must ensure effective communication consistent with Bufab's strategy and values.

Bufab aims to uphold an open and collaborative approach with stakeholders across diverse business sectors and countries. Bufab's communication should stay objective, professional, and service-oriented. Effectively managing information greatly enhances confidence in Bufab.

The corporate language is English. However, applicable rules require specific information in multiple languages; for example, most press releases and financial reports must be in English and Swedish.

### **4.1. Principles**

Communication is a vital tool for achieving Bufab's business targets. All of Bufab's communication with the media and investors should focus on long-term alignment with Bufab's brand, strategies, objectives, and values.

Communication should be timely, transparent, objective, well-organised, and well-prepared for both success and adversity.

Bufab must simultaneously provide accurate, relevant, and clear information to all its shareholders, capital markets, the public, and the media.

The disclosure of inside information must comply with the Rulebook and the Market Abuse Regulation ("MAR"). Inside information is to be disclosed to ensure fast access to such information on a non-discriminatory basis to the public within the EEA. The public must thereby be given the opportunity to a complete and correct assessment of the information in due time. Disclosed information must simultaneously be submitted to Nasdaq Stockholm and the Swedish Financial Supervisory Authority. In addition to what is stated in this policy, inside information shall be handled and disclosed in accordance with Bufab's Insider policy.

### **4.2. Limitations**

Without prejudice to Bufab's obligations to disclose inside information under applicable disclosure rules (mainly MAR and the Insider Policy), Bufab must avoid disclosing information that falls within one of the following categories:

- Confidential information.
- Commercially sensitive information.
- Third-party information, unless it has an impact on or relates to Bufab's business.
- Any information that could compromise an individual's integrity.

### **4.3. Internal communication**

Internal communication's mission is to support Bufab and its subsidiaries in achieving their objectives by providing employees with information about Bufab's objectives, strategy, operations, results, and commercial offerings. Successful internal communication relies on how quickly, often, openly, honestly, and understandably issues are communicated to employees.

It enables cooperation between the group's global functions, business units, and departments. However, internal communication is limited by the Insider policy, which restricts the communication of inside information. Internal communication primarily targets Bufab's employees, who can be divided into three subgroups:

- Managers and/or other key employees
- All other employees
- Potential and/or former employees.

Considering the limitations set by the rules of inside information, Bufab employees must maintain a consistently open and interactive flow of information at and between each organisational level, supported by established procedures and flexible, adequate channels. Within Bufab, methods and channels for internal communication include oral communication through meetings at the global group function, business unit, or department level, and written communication through platforms such as the intranet, newsletters, and email.

Bufab's Communication Director or CEO is responsible for distributing information relevant to the entire group.

Internal information is an integral part of all managers' overall responsibilities. Managers must adapt and communicate Bufab's objectives, business concept, and strategies. Furthermore, each manager is responsible for informing employees about matters that affect their work and the organisational unit. They also have a broad responsibility for communicating activities within their business unit or in other business units.

## **5. Media Relations**

### **5.1. Purpose**

The media enables us to reach important target groups such as the capital market, customers, policymakers, and the public, as well as indirectly employees and business partners. To create a fair view of Bufab in the media, we must be open and accessible, providing information tailored to the media's target groups and approaches. Transparency and honesty in dealings with the media reduce the risk of speculation and may mitigate potential damage to Bufab during a crisis.

### **5.2. Principles**

Bufab complies with the applicable disclosure requirements for listed companies. This entails, for example, that information classified as inside information must be handled and disclosed in accordance with the Insider policy.



### **5.3. Responsibilities and powers**

The primary spokesperson for the media is Bufab's CEO. Depending on the interview topic, other individuals may act as spokespersons. However, the designation of spokespersons for major media sources (national newspapers, business media, TV, radio, etc.) is done in consultation with the CEO of Bufab and Bufab's IR Manager. In each country, city, or market, the Managing Director of the relevant subsidiary is authorised to issue statements to the local press on behalf of their operations. However, before making statements on matters that fall outside the scope of normal business activities, Regional Managers should be consulted to ensure appropriate handling and communication. Group-related issues must be referred to Bufab's CEO.

### **5.4. Coordination of contact with the media/journalists, or analysts**

To coordinate Bufab's media relations, contact the CEO, CFO, or IR Manager before any interview. If unplanned, reach out to them immediately if a journalist or analyst contacts Bufab. Always request the journalist's or analyst's name, company, phone number, and discussion topics to designate a suitable spokesperson. This ensures proper response to inquiries and that Bufab controls its narrative.

### **5.5. Filming and taking photos in Bufab's facilities**

Photos or film cannot be taken in Bufab's facilities without permission. The reason is that Bufab must ensure that any information/media images are as accurate as possible. If a journalist wants to take photos or film in a facility, depending on the facility in question, Bufab's CEO, the subsidiary Managing Director or Bufab's IR Manager must be contacted to give their consent.

### **5.6. Conduct when dealing with the media**

What to do when a journalist calls:

- Find out the journalist's name, the company they are calling from, and the questions they want you to answer.
- If possible, ask if you can return their call after you have had time to consider the issues.
- Contact the IR Manager, CFO, or CEO to discuss the issues.
- The CEO will designate the person best suited to respond.
- The best-suited respondent reviews the questions and answers and calls the journalist.
- After the interview, the respondent should request a copy of the article or quotes. If possible, inquire about the opportunity to review and comment on the article/quotes to ensure their correctness.

### **5.7. Approach to interviews with the media**

If an interview is to be conducted, subject to the conduct outlined above, the following approach should be adopted:

- Only respond to questions that you are authorised to answer.
- Refrain from making negative comments about competitors.
- Never mention individual customers.
- Stay positive without being overconfident or smug. Provide proof for your statements.
- Do not give analysts or journalists advance information about upcoming events, even if they promise not to publish it before disclosure.

## **6. Investor Relations**

### **6.1. Purpose**

Investor relations refer to the interactions between Bufab and its current and potential shareholders, analysts, and brokers. The purpose of building relationships with the capital market - Investor Relations - is to ensure a true and fair valuation of Bufab. Bufab's communication aims to inspire investor confidence in the company and its performance, while minimising the risk of rumours and speculation. It should also contribute to increased interest in the shares and promote high liquidity with low share price volatility.

### **6.2. Principles**

The listing requires Bufab's communication to comply with the disclosure rules outlined in the MAR, the Rulebook, and the Code. The disclosure rules in the Code primarily pertain to corporate governance matters and apply only in certain areas.

### **6.3. Responsibilities and powers**

Bufab's CEO, CFO, and IR Manager are responsible for implementing and ensuring compliance with communications related to the capital market, while Bufab's board of directors oversees overall ownership matters. Given that this area faces intense regulation and strict guidelines, only Bufab's CEO and CFO are authorised to answer questions regarding Bufab's financial position and prospects.

The CEO, CFO, and IR Manager may nominate a spokesperson to address specific events and to present and comment on Bufab's performance on certain occasions for a limited time. Other Bufab employees may communicate with capital market players only with the spokesperson's approval.

### **6.4. Disclosure rules**

According to the Rulebook, inside information shall be disclosed in accordance with MAR. Additionally, inside information must always be managed and disclosed in line with the Insider policy. The Rulebook further states that certain specific information must be revealed, even if it is not deemed inside information. According to the Rulebook, this additional information shall also be disclosed in accordance with MAR. Consequently, regardless of whether the information is classified as inside information or is subject to the Rulebook's specific disclosure requirements, disclosure must occur according to the Rulebook and MAR. Press releases that do not contain inside information must avoid giving the impression of doing so and must not include a so-called legend for inside information. The Rulebook provides more detailed guidance and should be interpreted as applicable.

#### **6.4.1. Examples of what may constitute inside information**

The following situations may give rise to inside information which, in such case, shall be handled and disclosed in accordance with the Insider Policy and MAR:

- Orders or investment decisions.
- Co-operation agreements or other agreements of major importance.
- Business acquisitions and divestitures.
- Price or exchange rate changes.
- Credit or customer losses.
- New joint ventures.
- Research results, development of a new product or important invention.
- Commencement or settlement of, or decisions rendered in, legal disputes.
- Financial difficulties.
- Decisions taken by authorities.
- Shareholder agreements that the Issuer is aware of, which may impact the use of voting rights.
- Transferability of the financial instruments.
- Auditor's report.
- Market rumours and information leaks.
- Liquidity provision agreements.
- Information regarding subsidiaries and affiliated companies.
- Change in the financial result or financial position.
- Substantial changes to the operations of the Issuer.

### **6.4.2. Specific disclosure requirements under the Rulebook**

According to the Rulebook, the following information shall be disclosed by an issuer in the same manner as inside information is disclosed regarding timing and methodology, unless otherwise stated in the Rulebook:

- Forecasts, including information about the assumptions or conditions underlying the provided forecast, as well as forward-looking statements.
- Notices regarding attendance at general meetings of shareholders.
- Resolutions adopted at the general meetings.
- Resolution by the board of directors on a specific matter based on an authorisation from the general meeting.
- Changes to the board of directors, senior management and auditors.
- Entering into a new agreement for liquidity enhancement, which encompasses the main terms, any amendments made, and the termination of the existing liquidity enhancement agreement.
- Resolution on changes to the share capital or the number of shares, including all significant information concerning the changes.
- Issuance of financial instruments, including all significant information regarding the transaction.
- The outcome of the changes in the share capital or the number of shares.
- Changes in the share capital or the number of shares resulting from a creditor's conversion of debt.
- Decision to introduce a share-based incentive program, including the most important terms and conditions.
- Decision regarding admission to trading or de-listing of the financial instruments issued by the company, and the outcome of any such application.
- Financial reports, i.e. year-end reports and other interim reports.
- Any exemptions from the company's disclosure requirements contained in the Rulebook for issuers.
- Other information that Nasdaq Stockholm considers important to ensure fair and orderly trading.

To the extent that the information referenced in this section constitutes inside information, Bufab's CEO and/or CFO must determine the appropriate time for disclosure before the information is shared outside the group of individuals included in Bufab's logbook.

### **6.4.3. Methodology of disclosure and content of information**

Disclosed information must be accurate, relevant, clear, and not misleading. Information regarding decisions, facts, and circumstances must be sufficiently detailed to evaluate its significance for Bufab, its financial performance and position, or the price of Bufab's shares.



As a starting point, all information covered by the Rulebook's disclosure requirements, including inside information, must be disclosed as soon as possible. Under certain circumstances, Bufab may resolve on delayed disclosure in accordance with the provisions of MAR and the Insider Policy. The Rulebook also contains special disclosure requirements for other information (other than inside information) that must be disclosed in accordance with the Rulebook.

Bufab should disclose all information rapidly and non-discriminately to make it available to the public across the entire EEA. The information must be announced to Nasdaq Stockholm simultaneously with its public disclosure, as prescribed in the Rulebook, and thereafter be available on bufabgroup.com as soon as possible. In practice, a listed company must engage an information distributor to disclose the same information at the same time. The most important information should be presented clearly at the beginning of the message, and all messages must include a headline summarising the content.

Bufab must disclose corrections to errors in previously disclosed information as soon as possible, unless the error is insignificant.

#### **6.4.4. Information leakage**

If Bufab learns that inside information has been leaked before disclosure, it must promptly publish details about the incident in accordance with the Insider policy. If inside information is inadvertently disclosed to an outsider not bound by a confidentiality obligation, it must be shared without delay.

#### **6.4.5. Information to Nasdaq Stockholm only**

Should Bufab intend to submit a public takeover bid, Bufab must notify Nasdaq Stockholm when there are reasonable grounds to assume that these intentions could lead to such a bid. Should Bufab learn that another party plans to submit a public bid to Bufab's owners, which is not made public, Bufab must notify Nasdaq Stockholm if there are reasonable grounds to assume that this plan will be realised.

Should Bufab intend to disclose information that could reasonably be expected to have a material effect on the price of Bufab's share, Bufab must notify Nasdaq Stockholm prior to the disclosure.

### **6.5. Disclosure procedures**

#### **6.5.1. Press releases**

Press releases can be divided into three categories:

- Legal/financial press releases.
- Press releases about other capital market information.
- Press releases about non-financial information.

### Legal/financial press releases

Bufab's legal and financial press releases include, among other things:

- **Interim reports:** Announced as soon as they are approved at a board meeting, no later than two months after the end of the reporting period.
- **Year-end reports:** Announced no later than two months after the end of the preceding financial year, and are to be disclosed as soon as the board of directors has approved the annual accounts.
- **Notices convening the AGM and notices from the Nomination Committee:** These will be disclosed when they are issued, but no later than before the convening notice is sent to newspapers and before it is available on bufabgroup.com.
- **Reports from the AGM:** Bufab will publish a report on any significant resolutions adopted by the AGM promptly after the AGM.
- **Inside information:** When Bufab determines that there is inside information, press releases will be issued according to the Insider policy.
- **Other press releases:** Other information required to be presented by law or regulations, including the Rulebook.

### Press releases for other capital market information

Other capital market information, including news that is not insider information, should be communicated through press releases if it, in any way, is expected to contribute to Bufab's business objectives, such as organisational and management changes, issues related to technological breakthroughs, service offerings, and so forth.

### Press releases for non-financial information

Non-financial information, which refers to news primarily related to local activities and is neither financial nor insider information, will be communicated to the relevant market through press releases and coordinated by Bufab's CEO and the IR Manager.

Bufab's CEO must approve all Group-wide press releases. If the CEO is unavailable, the individual to whom the CEO has delegated this responsibility, or the Chairman or CFO of Bufab, must provide the approval. Press releases are distributed through an established distribution firm selected by Bufab. Bufab uses the distributor's lists of relevant target groups in capital markets and the media and customised lists of the company's contacts. The lists include:

- A broad group of capital market participants, stakeholders specifically interested in the sector, all analysts who monitor the sector, and Nasdaq Stockholm.
- Business and daily newspapers, news agencies, radio/TV and Industry media.
- Board members and major shareholders.
- International target groups include foreign correspondents in Sweden, foreign analysts, news agencies, and the business press.

Bufab spokespersons, also designated contact persons for press releases, must be available when the information is distributed.

### **6.5.2. Meetings with analysts, other presentations and capital market days**

Bufab aims to hold analyst meetings in connection with the publication of interim reports, some in physical settings and others as teleconferences. Bufab also plans to arrange one capital market activity each year. Inside information disclosed at meetings with analysts or similar events must be published beforehand or disclosed simultaneously. If inside information is announced accidentally, a press release must be issued immediately in accordance with the Insider policy. If this cannot be done immediately, Nasdaq Stockholm must be contacted promptly.

The basic principle is that the media should be invited to all capital market meetings. From time to time, Bufab will hold presentations for the public at shareholder meetings. If inside information is inadvertently disclosed at such a presentation without prior publication, it must be promptly disclosed in accordance with the Insider policy.

### **6.5.3. Silent period**

Bufab adheres to a one-month silent period before publishing interim reports. During this period, no meetings are conducted with the media, investors, analysts, or other capital market participants.

### **6.5.4. Approach to the content in other analyses, and so forth**

The content of analyses made by others is not to be commented on, except to correct factual errors. This also applies to articles in the media. However, commenting on an external analysis on rare occasions may be necessary. Should such a comment be issued, it must be distributed to all target groups simultaneously. Should it constitute inside information, it must be disclosed per the Insider Policy. This principle also applies to one-on-one meetings with analysts. At these meetings, however, Bufab may provide information that clarifies previously announced information, corrects misunderstandings, miscalculations and apparent misconceptions, and provide industry statistics. Meetings with analysts are to be registered. Bufab's CEO and CFO are responsible for ensuring that this takes place. However, this responsibility may be delegated.

### **6.5.5. Rumours and information leakage**

Market rumours or media speculation regarding Bufab may occur even if unfounded. Bufab's policy is not to comment on them. Bufab may address rumours and leaks by releasing accurate information through customary channels. In preparing for important decisions involving potential information leakage, particularly if the event constitutes inside information, Bufab must be ready to disclose it promptly via a press release. If rumours or leaks arise during major transactions, Bufab should consider notifying Nasdaq Stockholm, which may halt trading in its shares.

Suppose a rumour directly pertains to inside information that Bufab has postponed disclosing under Bufab's Insider policy, and the rumour is accurate enough to suggest that confidentiality is no longer maintained. In that case, the designated individual in accordance with the Insider policy shall be informed to determine whether the information should be disclosed as soon as possible.

For large-scale transactions involving many parties, gradually providing information or notifying Nasdaq Stockholm should be considered. This would allow them to choose to halt trading on the share before trading is significantly impacted by a potential information leak.

### **6.5.6. Unexpected and substantial change in the company's financial performance or position**

Bufab does not make profit forecasts; however, if the company observes any unexpected and significant deviation in its financial performance or position from what could reasonably be expected based on previously disclosed information, it must disclose details regarding this deviation if it is considered inside information. The same applies if, for example, sales indicate such a change. If the anticipated change in profit is likely to affect the price of Bufab's shares materially, Nasdaq Stockholm must be notified in advance.

### **6.5.7. Financial statements**

Bufab's annual, year-end, and interim reports are to be prepared in Swedish and English in accordance with applicable laws and regulations and the generally accepted accounting principles for listed companies. These reports are issued through press releases.

Interim reports are published on previously announced dates every quarter, which may not exceed two months after the expiration of the reporting period. The disclosure of interim reports on these announced dates may be subject to decisions that delay disclosure according to Bufab's Insider policy, as immediate disclosure may harm the company's legitimate interests. However, suppose it becomes evident that the interim report deviates from market expectations in a manner that would mislead the market through delayed disclosure. In that case, Bufab can no longer postpone the disclosure. In this case, the responsible person(s) must be informed to disclose the information as soon as possible (through a profit warning) in accordance with the Insider policy.

The annual report must not contain inside information. If the inclusion of inside information in the annual report is deemed appropriate during preparation, the relevant inside information must be disclosed separately prior to publication. The annual report must be published no later than three weeks before the annual general meeting.

### **6.5.8. Information to be disclosed under the Securities Market Act**

Under the Securities Market Act (*Sw. lag (2007:528) om värdepappersmarknaden*), Bufab must disclose any changes in the rights attributable to financial instruments issued by Bufab. The press releases must include a so-called legend stating that Bufab is obliged to disclose the information according to the Securities Market Act, as well as the time at which the information was provided for disclosure.

### **6.5.9. Information to be disclosed under the Trading Act**

According to the Financial Instruments Trading Act (*Sw. lag (1991:980) om handel med finansiella instrument*), Bufab must publish a press release on the change in the number of shares and votes on the last trading day of each month where the number of shares or votes has changed. Such a press release is to be accompanied by a so-called legend stating that Bufab is obliged to disclose the information according to the Trading Act, and indicating the time at which the information was provided for disclosure.



### 6.5.10. Annual General Meeting

Annual General Meetings are to be held within six months of the end of the financial year. Notice of the meeting will be announced in the official Swedish *gazette* (Sw. *Post- och Inrikes Tidningar*) and published on [bufabgroup.com](http://bufabgroup.com). The announcement that notice has been given will be published simultaneously in the Swedish newspaper Svenska Dagbladet. The complete notice of the AGM will be published in a press release. Such disclosure will occur before the convening notice is sent to the official Swedish gazette for publication and before it is made available on [bufabgroup.com](http://bufabgroup.com). The contents of notices convening an Annual General Meeting are governed by provisions in the Swedish Companies Act (Sw. *Aktiebolagslagen* (2005:551), the Rulebook and the Code.

It is not permitted to present inside information at the Annual General Meeting without simultaneously disclosing it. Should Bufab plan to announce such information, it must be disclosed in a press release prior to the opening of the AGM.

Immediately after the AGM, Bufab is to publish a press release on all resolutions adopted by the AGM that are not insignificant.

### 6.5.11. Website, and updating the website

The Communication Director is responsible for the external website [bufabgroup.com](http://bufabgroup.com) and its visual image, excluding the content under:

- **Investors**, containing mainly Financial information, Information regarding shares, and Corporate governance.
- **Press**, containing press releases and photos, and the possibility to subscribe to the press releases.
- **Become part of us**, containing information for potential acquisitions.

The content under Investors and Press is the responsibility of the IR Manager and the CFO. It is being updated in accordance with the requirements under the Swedish Companies Act, the Rulebook, the Code and other applicable regulations. These sections are described in more detail below.

The content under Become part of us is the responsibility of the Global Business Development Director.

### **Press releases**

On bufabgroup.com, there must be an easily identifiable section for press releases. In this section, press releases should be presented chronologically, clearly stating the date and time of disclosure. It must be evident to visitors which press releases are regulatory and Non-regulatory.

**Regulatory** press releases contain information required by law or regulations (i.e., the Market Abuse Regulation, Swedish law, the Rulebook, or the Code) to be disclosed to the public. These typically include financial results, significant corporate changes, or other inside information that could impact investors' decisions.

**Non-regulatory** press releases, on the other hand, are not mandated by law but are used to share news or updates that might interest the public or media. These can include marketing, company achievements, or other news of interest.

All disclosed information must be made available on bufabgroup.com as soon as possible after the disclosure and for at least five years. All financial reports must be available on bufabgroup.com for at least ten years after the disclosure. Access to inside information cannot be limited to any person within the EEA or entail any costs for the users. The reports will be available under Investors/Financial reports and Press/Press releases.

### **Corporate governance**

Under the Code, bufabgroup.com should have a dedicated section for corporate governance. This section includes the company's current articles of association and any other information mandated by the Code. Prior to the annual general meeting, it is necessary to update information regarding the board members, the CEO, and the auditor. Additionally, the corporate governance section must feature the ten most recent corporate governance reports, along with the portion of the audit report that addresses the corporate governance report or the auditor's written statement regarding the corporate governance report.

### **Financial calendar and AGM documentation**

Bufab will publish a financial calendar on bufabgroup.com listing the dates when the company expects to issue financial reports, the date of the annual general meeting, the week in which the annual report is anticipated to be published, and, if applicable, the date for dividend payments. The calendar will be made available on the website before the start of the relevant financial year.

If a disclosure cannot be made on the predetermined date, the issuer must publish information about the new date as soon as possible. If such a change is made within two weeks of a pre-announced date or of the new date, Bufab shall disclose the new date in a press release, including the reasons for the change if possible.

Under the Swedish Companies Act and the Code, the website must provide additional information and documentation before an AGM, including a convening notice for the AGM, proposals for decisions, various reports and statements, and proxy documents.

## **7. Crisis communication**

### **7.1. Purpose**

Crisis communication seeks to minimise damage to Bufab and its employees as much as possible during a crisis.

### **7.2. Principles**

From a communication perspective, a crisis is an event that could draw national and/or international media attention. A crisis may also lead to the media releasing information related to the company. In the event of a crisis or in case of leaks, all communication must be strictly centralised and managed by Bufab's CEO or by a person to whom the CEO delegates this responsibility.

In the event of a personal injury crisis, the designated business unit must first contact the fire and rescue service, taking measures to prevent any additional injuries if feasible. Furthermore, every business unit must establish a crisis and disaster response plan designed to minimise harm to individuals (both Bufab employees and non-employees), the environment, property, and the interests of Bufab and its customers.

Effective crisis communication plays a vital role in managing and lessening the consequences of a crisis on the Bufab brand, stakeholders, and subsidiaries. Each subsidiary's MD is responsible for ensuring the development, implementation, and compliance of the crisis response plans within their unit.

### **7.3. Responsibilities and powers**

In the event of a crisis, the CEO is to ensure that:

- The established crisis/disaster response plan is followed
- Bufab's Chairman of the Board, CFO and/or Communication Director is informed
- Employees and other relevant parties remain informed about the developments and their implications.

## **8. Roles and responsibilities**

The CEO is responsible for external communication for the entire Group. However, communication responsibilities may vary depending on the situation, and other spokespersons may be designated; these details are outlined in various sections of the policy.

The Chairperson of Bufab's board serves as the spokesperson for the board on all matters related to its work.

The Managing Directors of the subsidiaries are responsible for adapting and implementing the policy's principles in their respective areas and ensuring that the information communicated within those areas is accurate, relevant, clear, and not misleading.

Special care must be taken in situations that could potentially attract national and/or international media attention or affect Bufab's image, such as during a crisis or in the event of leaks. Those responsible should always be aware that they are acting and speaking as representatives of Bufab, and no comments should contradict Bufab's overall mission. A specific local event could develop into a situation involving the entire Group, so it is essential to evaluate the potential impact on the entire Group.

### 9. Exceptions

This policy does not allow exceptions. Any need for exceptions must be clearly defined and documented. The Bufab Board of Directors shall approve all exceptions.

### 10. Monitoring and compliance

The Board of Directors is ultimately responsible for Bufab Group's strategy and organisation and shall ultimately monitor the administration of and compliance with the HR Policy. The MD of each subsidiary within the group shall annually report on policy compliance to their respective Regional Director and CEO. Internal audits to monitor compliance are conducted periodically.

### 11. Bufab Best Practice

All different Bufab policies can be found within Policies:  
<https://bufabcom.sharepoint.com/sites/BP-Policies>

### 12. References to associated documents

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**Erik Lundén**  
CEO Bufab Group



**Martijn van Daal**  
Global HR Business Partner & Communications  
Director



### 13. Log of updates

Revision	Date	Update
1.0	2023.10	Adopted by the board
2.0	2018.10	Revisions adopted by the board
3.0	2019.10	Revisions adopted by the board
4.0	2020.10	Revisions adopted by the board
5.0	2021.10	Revisions adopted by the board
6.0	2022.10	Revisions adopted by the board
7.0	2023.02	Revisions signed
8.0	2023.10	Extended validity
9.0	2023.12	Revisions signed
10.0	2025.01	Added reference towards the Policy for the signing tool
11.0	2025.03	The policy changed to policy document and merged with communication by the board policy