

## PION Group information- and insiderpolicy

This Information and Insider Policy was approved by the Board of Directors of PION Group AB on 7 May 2024 and was thereafter published on [www.piongroup.se](http://www.piongroup.se). The policy shall be revised as necessary, however at least once annually

### 1. Grundprinciper

PION Group AB (publ) is a listed company that is listed on Nasdaq Stockholm AB. PION shall comply with stock market and securities markets regulations as well as other applicable laws and ordinances for limited companies in Sweden.

PION Group shall provide timely, current, accurate, relevant and reliable information to the capital market and pursue an open dialogue with market actors regarding PION's historical evolution and future prospects, business development and opportunities for growth, all within the scope of applicable stock market rules and laws.

PION Group does not provide any forecasts about its future financial developments.

### 2. Allocation of responsibilities and spokespersons

The Group Chief Executive Officer/CEO of PION Group AB is ultimately responsible for PION's communication with the capital market. The CEO has delegated the performance of certain tasks to the Chief Financial Officer (CFO), the IR Manager and the Director of Marketing and Sales. PION's Board of Directors is formally responsible for the interim accounts and annual accounts.

PION's communication with the capital market is conducted exclusively at Group level, unless otherwise decided by the CEO.

The CFO is responsible for providing the CEO and the Board of Directors with accurate and relevant information about PION's financial position and results. The CFO is also responsible for ensuring that relevant information is distributed to the capital market and other stakeholders (for example the media, authorities, opinion leaders and PION's own employees).

PION's CEO is the overall spokesperson for the Group. Other members of the Group management act as spokespersons within their respective area of responsibility. The CEOs of subsidiaries and any other employees that are contacted by analysts, investors or other media regarding capital market matters are to contact the CEO before any information is provided.

### **3. Guidelines for communication with the capital market**

In accordance with the listing agreement, information regarding all events that may affect PION's share price is to be immediately disclosed to Finansinspektionen (FI) (Eng. Swedish Financial Supervisory Authority) and Nasdaq Stockholm AB and made publicly available via the media. Thereafter, the information is to be published without delay on PION's website: [www.piongroup.se](http://www.piongroup.se). The IR Coordinator is responsible for this task.

#### 3.1. Annual Report

The CFO has the overall responsibility for preparing the annual report, the management report and other financial information. The CEO is responsible for preparing the section on business operations. The annual report is to be approved by the CEO and subsequently by the Board of Directors of PION. The entire annual report is to be published in Swedish.

#### 3.2. Quarterly reports

Interim reports and year-end reports are prepared by the CFO, adopted by the CEO and thereafter approved by the Board of Directors of PION Group AB. Interim reports and year-end reports are published in Swedish.

#### 3.3. Press releases

Press releases concerning the capital market include interim reports and year-end reports, invitations to the General Meeting of Shareholders, summaries of the most important decisions taken at the General meeting of Shareholders, acquisitions and disposals, new senior executive appointments and major new client assignments. Anything that may affect the PION share is to be immediately made public as described above.

Accompanying documentation to press releases regarding major acquisitions and disposals of companies and assets, financial transactions and other major changes that have substantial financial impact, is to be prepared by the CFO. Documentation for other press releases is to be prepared by the relevant business unit.

All press releases are to be channelled through the IR manager, who is responsible for ensuring that information is received by Finansinspektionen, Nasdaq Stockholm AB and other relevant stakeholders.

Press releases that concern the capital market are published in Swedish and in some cases also in English. Press releases that are considered to impact the stock market are to be approved by the CFO and CEO before they are issued.

#### 3.4. Capital market meetings, analyst and investor meetings

Any capital market meetings for analysts, investors and the media are organised by the IR Manager. Other analyst and investor meetings (both group meetings and one-on-one meetings) are arranged in conjunction with the publication of interim reports and as requested by the 3(5) market. The CEO and/or the CFO usually attend these meetings. No meetings are arranged during the "quiet period", see below.

Information provided at meetings with capital market actors is based on published financial reports and general information about developments at PION and within its sector. Material provided must not contain new information that may affect the valuation of the PION Group share.

### 3.5. Website

According to Finansinspektionen's rules, press releases and reports must be posted on the company's website as soon as possible after disclosure. All public information to the stock market must be available on the website for a minimum of three years.

All press releases regarding the capital market are published on PION's website [www.piongroup.se](http://www.piongroup.se), including those for which there is no obligation to inform the stock market.

The IR Coordinator is responsible for ensuring that press releases, interim reports, year-end reports, annual reports and articles of association are published on the website.

### 3.6. General Meeting of Shareholders

The General Meeting of Shareholders is PION's highest decision-making body, at which shareholders jointly resolve on important matters regarding PION Group AB. The date of the meeting is announced well in advance. Notices convening General Meetings of Shareholders, both extraordinary and ordinary, are announced in a press release in accordance with the listing agreement.

The IR Coordinator is responsible for ensuring that the notice of the General Meeting of Shareholders is distributed as stated above, and for other planning and implementation of the meeting.

## **4. Information to employees**

In the periods between interim reports, information to employees about financial developments may only be provided for smaller units. Information about PION's results at an aggregated level is provided to all employees when the information is made public. PION Group employees that have access to non-public information of relevance to the capital market are regularly reminded of the importance of not disclosing such information, in accordance with regulations for persons with access to inside information.

## **5. Quiet period**

PION Group does not hold any meetings with the media, investors, analysts or other capital market actors from the end of a financial quarter until the publication of the corresponding interim report. During the quiet period no remarks are made regarding PION's economic development and only matters of a more general character are dealt with externally during this period.

## **6. Leakage of information and rumours**

The CFO monitors leakages of information and events that may lead to leakages of information, and regularly checks statements about PION in the media and on the internet. The CFO notifies the CEO who consults with the Management team to determine whether the event presents a significant risk. If so, the Chairman of the Board is immediately involved in the matter.

PION Group does not normally comment on rumours or speculation about the company. The CEO, in consultation with the Chairman of the Board, decides on any actions to be taken in the event of, or to prevent, leakage of information, and determines whether a "holding statement" is to be prepared or a press release issued in cases where rumours have caused share price movements, or if Finansinspektionen or Nasdaq Stockholm AB require an explanation.

## **7. Crisis communication**

If a serious event (crisis) occurs that may affect PION's information to the capital market, the Group management and Chairman of the Board act as the crisis management team. In such cases, the Group management and any others concerned are to manage dissemination of information to the market.

## **8. Negotiations regarding company acquisitions and disposals**

During negotiations regarding company acquisitions/disposals, only the necessary persons are to be informed. These people should sign a non-disclosure agreement to the extent that their employee agreements do not cover such matters. In the case of company acquisitions or similar, stock market rules regarding insider lists and logbooks must be adhered to. The CFO is responsible for this task.

## **9. MAR - Handling insider information**

All PION Group employees are to adhere to the confidentiality requirements in place regarding dissemination of information and disclosure of non-public information and comply with rules governing and limiting securities trading.

PION Group is subject to the provisions of the EU Market Abuse Regulation (EU) No 596/2014 ("MAR") which places strict requirements on how PION is to handle insider information. Amongst other things, MAR regulates how insider information is to be disclosed to the market, the conditions under which disclosure can be postponed, and PION's obligation to establish a register of people who work for the company who have had access to insider information about PION (a logbook).

PION uses the digital tool InsiderLog to ensure that the above process fulfils the MAR requirements and PION's insider policy; from the decision to postpone the disclosure of the insider information all the way to the notice that is to be provided to Finansinspektionen when 5(5) the insider event is over, and the information has been disclosed. Only authorised

PION personnel have access to InsiderLog. Further information is available at [www.insiderlog.se](http://www.insiderlog.se).

## **9.1 Transactions by persons discharging managerial responsibilities**

The coming into force of Article 19 of MAR entailed new rules for the reporting of insider trading from 3 July 2016. PION has a duty to notify persons discharging managerial responsibilities within the company of their obligations pursuant to Article 19.

Persons discharging managerial responsibilities, in turn, have a duty to notify persons closely associated with them of their obligations pursuant to Article 19, and retain a written copy of such notification. PION shall also establish a register of all persons discharging managerial responsibilities within the company, as well as persons closely associated with them.

### *Reporting of transactions*

Persons discharging managerial responsibilities and persons closely associated with them have an obligation to notify PION and FI of every transaction conducted on their own account relating to the shares or debt instruments issued by PION, or to derivatives or other financial instruments linked to PION. The obligation to notify of such transactions only applies if a total transaction amount of EUR 5,000 has been reached within a calendar year.

### *Prohibition on trading*

Article 19 also includes provisions regarding the prohibition on trading. The prohibition applies to persons discharging managerial responsibilities and means that they are not permitted to conduct any transactions in financial instruments issued by PION, or in related financial instruments, during a period of 30 calendar days before the publication of an interim report or a year-end report. Under certain circumstances PION may allow an exception to the prohibition on trading for a person discharging managerial responsibilities.

PION uses the digital tool InsiderLog to ensure that the company fulfils the MAR requirements and those of this policy to notify persons discharging managerial responsibilities within the company of their obligations pursuant to Article 19, and to maintain a register of persons discharging managerial responsibilities and persons closely associated with them. Only authorised PION personnel have access to InsiderLog. Further information is available at [www.insiderlog.se](http://www.insiderlog.se).