

# Communication policy



CASTELLUM



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## Introduction

Castellum's communication policy establishes principles, allocations of responsibility and related guidelines to ensure relevant, objective, transparent and correct communication in accordance with the company's core values, goals and applicable regulations. The communication policy governs external and internal communication. This policy applies to all of the company's employees and compliance with the policy creates consistent communication about the company's operations that is useful for tenants, owners and other stakeholders.

## Principles

Castellum's communication is to be characterised by the following principles.

### Relevant

Castellum's communication is relevant based on the company's operations and decision-making ability. It is also relevant based on current events and the history of the company.

### Objective

Castellum strives for objectivity and communicates reliable information in a simple, accessible way.

### Transparent

Castellum values open and transparent communication and aims to consistently and reliably share company information with its stakeholders.

### Correct

Castellum complies with laws and regulations for listed companies and the regulations that apply to financial reporting and publication of material information that can influence investors' decisions.

## Allocation of responsibility

Most employees at Castellum communicate in one way or another, internally or externally, and are individually responsible for this. A precondition for coordinated and successful communication is a clear allocation of responsibility. Below are descriptions of responsibilities and tasks for the functions that are the most closely related to communication issues.

### Chairman of the Board

The Chairman of the Board speaks about corporate governance issues such as ownership matters, strategy, Board nominations, Board meetings and remuneration, unless other arrangements have been agreed with the CEO.

### Chief Executive Officer (CEO)

The CEO is the main spokesperson, either themselves or through the Head of Investor Relations, for the Group in overall operational matters such as the Group's financial position, strategy, organisation and development issues. At an strategic level, the Chairman of the Board can also be an external spokesperson in these issues.

**Chief Financial Officer (CFO)**

The CFO is responsible for Castellum's financial reporting, collating information and financial content. The CFO, together with the CEO or the Head of Investor Relations, is a spokesperson in financial matters and communicates regarding issues affecting the company's financial reporting and financial position in order to meet the capital market's requirements for information about Castellum's operations and development.

**Chief Legal Officer**

Castellum's Chief Legal Officer is the company's spokesperson at Nasdaq and with supervisory authorities.

**Communications Director**

The Communications Director is the Group's spokesperson on general matters and coordinates Group-wide media management. The Communications Director also supports the CEO and CFO in all company-wide communication and is responsible for the company's external crisis communication.

**COO, Regional Managing Directors and business area managers**

Responsibility for operational activities, a region or a business area also includes the related communication aspects. Communication responsibility therefore follows the line organisation responsibility. These responsible individuals function as spokespeople, primarily in industry and local media, as well as in other public contexts in issues that pertain to their own area of responsibility. Communication responsibility also includes keeping content within an area of responsibility up to date in external channels, such as on the company's website.

**Other employees**

Other employees can express opinions on issues at the company that they are responsible for. In other matters, they should refer to the spokespersons named above. All employees have the right as private individuals to make personal statements, for example, in social media. It should be clear that the opinions being expressed are those of the individual, and not Castellum. One part of employee responsibility includes the awareness that in all contexts – including private – they may be perceived as a representative of Castellum. This insight can function as a guide for which issues can be commented on and how.

**Supporting documentation and guidelines****Press and media**

Castellum strives to have positive media relationships by continuously providing relevant and newsworthy information and by being accessible and answering questions when relevant and to the company's operational benefit. All media contact is coordinated with the communications department. Additional guidelines for interacting with the press are in the company's document Guidelines for press and media.

**Financial communication**

Castellum's financial communication is governed by the Market Abuse Regulation (MAR) and Nasdaq's regulations. Financial communication also aims to comply with regulations and standards as well as to create understanding for and knowledge of strategy, goals, business operations and financial position and supporting the correct valuation of the company and its

financial instruments. All regulatory information is to follow the stock exchange's regulations and Castellum's insider policy.

**Brand platform**

All communication is based on Castellum's brand platform, including visual identity, tonality guide and core values.

**Privacy**

We are exacting about personal privacy and all personal data is processed in accordance with the General Data Protection Regulation (GDPR) and other data protection legislation. The company's media bank provides procedures for publishing and storing images.

**Crisis communication**

In the event of a crisis, the crisis policy and crisis plan for communication are to be followed. All media contact in connection with a crisis is to be coordinated with the communications department.

**Internal communication**

Each area of operation is also responsible for communicating its issues internally, for example by keeping information updated and relevant on Castellum's intranet. Each manager is also responsible for forwarding relevant information on strategy, goals, core values, guidelines and policies to their employees. Instructions for which information and events are to be published internally are presented in the reference sheet for the company's Intranet.

As a public company, Castellum is obligated to publish regulatory and price-sensitive information to all markets, in the same way, at the same time. Castellum strives for parallel internal communication to its employees on these occasions.

**Document owner**

Castellum's communication policy is revised once annually and adopted by the Board of the company. The CEO of Castellum is the document owner and responsible for the policy. Revisions are made by Castellum's Chief Communications Director.