



Information and insider policy

1 Basic principles

AQ Group shall observe EU:s MAR (Market Abuse Regulation) and directives from Nasdaq Stockholm stock exchange, as well as other applicable laws and regulations for limited companies in Sweden. AQ Group shall issue prompt, simultaneous, correct, relevant and reliable information to the capital market and strive to achieve an open dialogue with players in the market with regard to AQ's historical development and future prospects, business development and opportunities for growth, all within the framework of currently valid Stock Exchange rules and laws. AQ Group does not issue any forecast in respect of future financial developments.

2 Allocation of responsibility and spokespersons

The CEO of AQ Group AB is the person with ultimate responsibility for AQ Group's communication with the capital market. The CEO has delegated the performance of certain tasks to the CFO and the Business Development Manager. AQ Group's Board is formally responsible for the interim reports and the year-end reports. Communication with the capital market is conducted within AQ Group exclusively at Group level, unless the CEO decides otherwise. The CFO is responsible for providing the CEO and the Board with correct and relevant information about AQ Group'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 media, authorities, opinion makers and AQ Group's own employees). The CEO is AQ Group's overall spokesperson. Other members of Group Management are spokespersons within their respective areas of responsibility. Employees who are contacted by analysts, investors or media in matters concerning the capital market should contact the CEO before information is provided

3 Guidelines for contacts with the capital market

Information on all events that may affect AQ Group's share price shall, according to Nasdaq Stockholm's regulations, be immediately notified to the Swedish Financial Supervisory Authority (FI) and NASDAQ OMX Stockholm AB, and made available to the public via the media. The information is then published without delay on AQ Group's website www.aqg.se. The business development manager is responsible for ensuring that this happens.

3.1 Annual Report

The CFO has the overall responsibility for the preparation of the annual report and for the directors' report and other financial information. The annual report must be approved by the CEO and subsequently by AQ Group's Board of Directors. The annual report is published in its entirety in Swedish and English.

3.2 Quarterly interim reports

Interim reports and year-end report are produced by the CFO, confirmed by the CEO and subsequently approved by AQ Group's board. Interim reports and year-end report are published in Swedish and English.



3.3

Press releases

Information affecting stock price shall generally be published through a press release as soon as possible. Such information includes orders and investment decisions, cooperation agreements or other important agreements, purchases and sales of companies, price or currency changes, credit or customer losses, new "joint ventures", research results, development of new products or important inventions, initiation or settlement of legal disputes as well as relevant court decisions, financial difficulties, government decisions, shareholder agreements known by AQ and which can affect the transferability of AQ's financial instruments, rumours in the market and information leakage, "market-maker" agreements, information regarding subsidiaries and associated companies, material change in results or financial position and thorough changes in AQ's activities, interim reports and year-end report, invitation to the annual general meeting, excerpts from the most important decisions at the annual general meeting, and new senior executives. All events that may affect the valuation of the AQ Group share shall be published immediately as described above. The basis for press releases that relate to major acquisitions and sales of companies and assets, financial transactions and other major changes with large financial effects are prepared by the Business Development Manager. The basis for other press releases is produced by the respective business unit. All press releases must be channelled through the CEO. The Business Development Manager is responsible for ensuring that the information reaches the Swedish Financial Supervisory Authority (FI), NASDAQ OMX Stockholm AB and other relevant stakeholders. Press releases that concern the capital market are designed in Swedish and in some cases also in English. Press releases must be approved by the CFO and CEO before they are issued.

When publishing press releases with information affecting stock price, it must be made clear that the information is such that the company must publish in accordance with MAR and through whom and when it was submitted for publication.

The company may, on its own responsibility, postpone disclosure of inside information provided the following conditions are met.

- Immediate disclosure would likely damage the company's legitimate interests; one example is ongoing contract negotiations
- Deferred publication is unlikely to mislead the public, and
- The company can ensure that the information remains confidential.

The company decides on its own responsibility if these conditions are met. It is required that there is a decision on the postponement. If the company has no authority to postpone the publication, it may impose sanctions from both the stock market and the Swedish Financial Supervisory Authority.

Notifications that the disclosure of inside information has been delayed shall immediately be submitted to FI by e-mailing finansinspektionen@fi.se after the insider information has been published. The CFO is responsible that this is done, The e-mail shall include the name and contact details of the person submitting the information (e-mail and telephone number), the heading of the disclosure and the reference number (if relevant). The date and time of the disclosure and the decision to delay the disclosure shall also be included, as well as the identities of all persons responsible for the decision. A template for the notification is available on FI's website.

In the event of a change in the total number of shares or votes in the company, AQ shall publish information on the change on the last trading day of the calendar month in which the increase or decrease occurs.



3.4 Investor Relations

The purpose with Investor relations is to create and maintain knowledge about AQ Group amongst investors, analysts and financial journalists and by that enable a correct valuation of the AQ Share.

Any capital market meetings for analysts, investors and the media are arranged by the CEO. Other analyst and investor meetings (both group meetings and individual, "one-on-one" meetings) are arranged in connection with the publication of interim reports or as requested by the market. The CEO and/or CFO will normally attend these meetings. No meetings are arranged during the so-called "silent period", see below. The information issued at meetings with players in the capital market is based on published financial reports as well as general information about developments at AQ Group and in the industry. Material issued may not contain any new information that might affect the valuation of AQ Group.

3.5 Website

According to the rules of the Swedish Financial Supervisory Authority, press releases and reports must be made available on the company's website as soon as possible after publication. All information published for the share market covering at least the last three years must be available on the website. All press releases relating to the capital market are published on AQ Group's website www.aqg.se, even those that do not involve a duty of information to the Stock Exchange. The Business Development Manager is responsible for ensuring that press releases, interim reports, year-end reports, annual reports and the Articles of Association are published on the website.

3.6 Annual General Meeting

The Annual General Meeting is AQ Group's highest governing body, where the owners jointly decide on important issues for AQ Group. The date of the meeting shall be stated in good time. The entire notice to the Annual General Meeting, both extra and ordinary, shall be published with a press release according to Nasdaq Stockholm's regulations. The CEO is responsible for ensuring that the notice of the Annual General Meeting is sent out in accordance with the above and for other planning and implementation of the meeting. After the meeting, a report with the decisions made at the meeting shall be published immediately.

4 Information to employees

Between the interim reports, information to employees on financial developments may only be issued for smaller units. Information about AQ Group's results on a consolidated level is issued to employees in connection with its publication. AQ Group employees with access to unpublished information of relevance to the capital market are reminded regularly of the importance of this information not being disseminated, in accordance with the prevailing legislation for people with an insider position.

5 Silent Period

AQ Group does not arrange any meetings with the media, investors, analysts or any other players in the capital market between the end of the financial quarter and the publication of the corresponding interim report. During this silent period no comments are made regarding AQ Group's financial performance, and only questions of a generic nature are dealt with externally during this period.

6 Information leaks and rumours

The CEO monitors information leaks and events that may lead to information leaks, and regularly monitors statements about AQ Group in the media and on the Internet. As a rule, AQ



Group does not comment on rumours or speculation about the company. The CEO considers what action should be taken in the event of or to prevent the occurrence of information leaks and decides whether press releases should be issued in the event that the rumour has caused movements in the share price, or if the Swedish Financial Supervisory Authority or Nasdaq Stockholm AB request clarification.

7 Crisis communication

If there is a serious event (crisis) that might affect AQ Group's information to the capital market, Group management takes on the role of crisis management group. In such instances Group management and, if necessary, other parties involved deal with the issuing of information to the market. The company has an internal governing document that constitutes an action plan in the event of a crisis.

8 Negotiations on company sales or acquisitions etc.

In connection with corporate purchases / sales and in other cases when there is stock price-sensitive information that have not been published, no more persons than necessary must be informed. These must sign a confidentiality relationship to the extent that this is not met through their employment contract. In such situations, MAR's requirements on log book must be met. The Business Development Manager is responsible for ensuring that this happens.

9 People in insider positions

All AQ Group's employees must comply with the confidentiality requirements that exist regarding information disclosure and disclosure of non-published information and follow the rules that regulate and restrict trading in securities. In accordance with current legislation, AQ Group has defined the persons who are in leading positions. These are AQ Group's Board of Directors and Group Management. These persons must in turn inform AQ of who is related to them, namely spouse, cohabitant, children at home, relatives who share housing with at least one year and related legal entities. "Related legal entities" means legal entities (a) whose management is performed by a person in a leading position or by a relative of this person, or (b) directly or indirectly controlled by such person, or (c) established by benefit of such a person; or (c) whose financial interests essentially correspond to the interest of such a person. AQ manages a list of all persons in leading position and their closely related persons. All persons in a leading position are responsible for keeping the register of persons in a leading position and their related parties updated, which is done to insider@agg.se according to MAR. Currently, all people in leading positions must, by law, notify Swedish Financial Supervisory Authority and insider@agg.se of their respective holdings and changes to AQ Group shares no later than three days after the transaction. The reporting obligation applies to all transactions once a total amount equivalent to EUR 5 000 has been reached within one calendar year. This total amount includes the transaction that resulted in the threshold being reached or passed. The notification obligation also applies to related parties. All persons in a leading position are obliged to inform their relatives about this.

To the extent that AQ establishes a list of so-called permanent insiders, these shall be made up of the persons in leading positions, auditors and others, who regularly have access to information that is not publicly available.