



Information and insider policy

1. General

- a. This information and insider policy (“Policy”) was approved by Greater Than’s Board of Directors on 2021-10-27. The Policy will continue to be revised when necessary.
- b. Greater Than AB (the “Issuer”) is a public limited company whose shares are admitted to trading on the Nasdaq First North Growth Market in Sweden (the “Trading Place”). The Issuer must follow the rules that apply at the Trading Place, as well as other applicable laws and regulations that apply to public limited companies in Sweden. This Policy aims to ensure a good quality of both internal and external information, and to ensure that applicable laws, rules and agreements are complied with. In addition, it aims to ensure that the Issuer maintains a high ethical standard and prevent any type of improper or unauthorized trading in the Issuer’s securities.
- c. The Policy concerns all of the Issuer’s employees and can be summarized as follows:
 - i. The Issuer’s communications in accordance with this Policy shall be accurate, relevant and clear.
 - ii. The Policy shall ensure that applicable laws, regulations and agreements are complied with.
 - iii. It shall be easy to find and obtain information in the Policy about the Issuer for both employees and external stakeholders as well as for other interested parties.
 - iv. All information in the Policy must be of high quality and it must never be ambiguous or misleading. Difficulties and problems must be carefully highlighted together with the measures taken to solve them. It is important that the person acting as information manager at the Issuer is available on request. The communication from the Issuer must be in Swedish and/or English.

2. The scope of the Policy

The Policy covers all external communication in accordance with provision 3 in this Policy, such as, for example; website, press releases, financial reports, oral information at meetings/conversations with analysts and investors, interviews with the media, etc.

3. Tools for communication

The Issuer’s tools for communication can be:



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- The website
- Press releases
- Interim reports
- Year-end reports
- Quarterly reports
- Annual reports
- Prospectus or information memorandum
- Printed information material
- Electronic presentation material
- Answers to inquiries by telephone, email and fax
- Analyst contacts and personal contacts
- Social media

4. Division of responsibilities and spokespersons

- a. The Issuer's CEO is ultimately responsible for when, how and what information may be disseminated by whom in the Issuer's organization.
- b. The communication responsibility of the Issuer is shared between the CEO and the Board. The general rule is that the person who is best suited to answer a question is also given the responsibility to do so.
- c. The following communication rules apply:
 - i. The Issuer's CEO is the spokesperson for company-wide issues, such as financial position, business strategies, market and competition assessments — in short, all information. In the absence of the CEO, the Issuer's founder Sten Forseke or Communications Manager Eva Voors is responsible for all external information. Other employees should not make any comments other than in general terms and then on facts and conditions that are already generally known to the public.
 - ii. Ownership issues are referred to the Issuer's Chair of the Board.

d) The subsidiaries are responsible for the information to the customers, the market and the public as long as the information is not considered price-affecting for the Issuer in accordance with EU Market Abuse Regulation 596/2014 / EU ("MAR").

e) The Issuer's CEO is responsible for all decisions and actions related to decisions about when inside information exists, the publication of such information and keeping the Issuer's insider list and that the persons in leading positions are informed.

5. The Issuer's obligation to provide information

a) MAR defines the term "inside information" as information of a specific nature which has not been published, which directly or indirectly concerns the Issuer or the security and which, if published, would be likely to have a material effect on the price of the securities. Information that was disclosed as "likely to have a material effect on the price" of the security is considered to be information that a prudent investor would be likely to use as part of the basis for his or her investment decision. For processes that take place over time, intermediate steps can also be considered inside information.



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b) The assessment of what is inside information must be based on facts and circumstances and be decided on a case-by-case basis. In case of doubt, the Issuer should in the first instance contact the Issuer's Certified Adviser for advice. The basic rule, however, is that information which, if published, would probably have a material effect on the price of the Issuer's financial instruments. It is thus not necessary for there to be a real change in the price.

c) The Issuer shall ensure that all stakeholders in the stock market have simultaneous access to price-affecting inside information concerning the Issuer. The Issuer must therefore ensure that the inside information is treated confidentially before it is published and that no unauthorized party has access to such information. It follows from the above that new inside information with an impact on prices may not be disclosed to analysts, journalists or others either individually or in groups if it is not published at the same time.

d) In special cases, where information is provided as a normal part of the performance of a service, activity or obligation and the person receiving the information is obliged not to disclose it, information may be disclosed before publication to such persons actively participating in the decision-making process or because of their professional role takes part in the work of producing the information. This may, for example, refer to information to major shareholders or prospective shareholders when probing prior to a planned new share issue, to advisers whom the Issuer hires for e.g., prospectus work prior to a planned share issue or other transaction of a larger scope, to the intended bidder or target company in conjunction with negotiations on a takeover bid, to the rating agencies prior to credit rating or to creditors prior to important credit decisions.

e) The Issuer may not be relieved of its obligation to disclose inside information by entering into an agreement with another party to the effect that certain information, or details of such information, may not be disclosed by the Issuer. The Issuer should therefore never enter into such agreements.

f) The information provided by the Issuer shall be accurate, relevant, clear and not misleading. The information must not disclose anything that could affect the assessment of the Issuer.

g) In order to ensure as fair a distribution of the information as possible when inside information is to be communicated to the market during ongoing trading, the Issuer's Certified Adviser must be contacted in advance by the Issuer's CEO. According to the Trading Place's regulations, information that is not insignificantly likely to affect the valuation of the Issuer's shares may not be provided in any other way than through publication.

For example, there is a duty to provide information in the following situations:

- a) orders and investment decisions,
- b) cooperation agreements or other material agreements,
- c) purchase and sale of companies,
- d) price or currency changes,
- e) credit or customer losses,
- f) new joint venture,
- g) research results, development of new products or important inventions,
- h) the initiation or settlement of legal disputes and relevant court decisions,



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- i) financial difficulties,
- j) government decisions,
- k) shareholder agreements that are known by the Issuer and that may affect the transferability of the Issuer's financial instrument shares,
- l) market rumours and information leakage,
- m) "market maker" agreements,
- n) information concerning subsidiaries and associated companies,
- o) material change in results or financial position,
- p) radical changes in the Issuer's activities.

The Trading Place's regulations mean that certain current information is mandatory to publish, and this applies to:

- a) Year-end report
- b) Annual General Meeting
- c) Interim reports
- d) Notice of Annual General Meeting
- e) Information that the annual report is available
- f) Notice of and resolution at the Annual General Meeting
- g) Changes in the composition of the Board and replacement of senior executives and/or auditors, as well as replacement of Certified Adviser
- h) Termination of agreement with liquidity guarantor
- i) Auditor's report
- j) Transactions of related parties
- k) Share-based incentive programmes
- l) Issues of financial instruments
- m) Trading in another trading venue
- n) If the Issuer observes that its earnings trend during a quarter deviates significantly, upwards or downwards, from the picture of the Issuer's situation created by previously published information, this shall be made public. In cases where the unexpected significant change in earnings can be assumed to have a significant price-affecting effect, the Certified Adviser and the Trading Place must be notified in advance.

Any publication made by the Issuer in accordance with this Policy shall contain the identity and contact details of the Issuer's Certified Adviser.

6. Postponement of the publication of inside information

- a. The Issuer may choose to exercise its right to defer publication of the inside information in accordance with MAR. The Issuer must then ensure that the following conditions for deferral of publication of inside information are met, and document in writing and in detail



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how and in what way below conditions are met and who has made the decision to defer the publication of inside information.

- i. The Issuer may defer the publication of the inside information provided that such publication may harm the Issuer's legitimate interests. What is meant as legitimate interests may, for example, be about ongoing negotiations or transactions which, if they came to the public's attention, could harm the Issuer.
 - ii. The Issuer can ensure that a postponement does not mislead the public.
 - iii. The information can be handled in strict confidence and the Issuer can ensure that the information remains confidential.
- b. The Issuer's CEO is responsible for decisions on deferral and that such a decision meets the above conditions, and that the required documentation is compiled and kept confidential for five years.
- c. If the conditions on which a decision on deferral is based change, a new assessment must be made immediately as to whether the conditions for a deferral are still valid. In conjunction with this, these new decisions must be documented.
- d. In conjunction with a postponement, an insider list shall be drawn up. The method and division of responsibilities for this can be found under the section "Insider list".
- e. When a decision on deferral is made, the Issuer's Certified Adviser must be notified, and the documentation prepared by the Issuer, and which forms the basis for the decision must be submitted. The Issuer's CEO is responsible for providing this information to the Issuer's Certified Adviser.
- f. Decisions and handling of deferrals shall be made in accordance with clearly established routines within the Issuer and with good foresight.
- g. If the Issuer is unable to ensure that the information remains confidential, the information shall be published as soon as possible through an approved news distributor. In conjunction with a decision on deferral, the Issuer must therefore prepare a press release that can be published in the event of information being leaked. The press release shall also be checked by the Issuer's Certified Adviser in conjunction with the submission of other documentation. It is the Issuer's own responsibility to prepare the press release and to make the necessary adjustments proposed by the Certified Adviser.
- h. The Issuer shall have clear routines for how inside information is to be handled. If anyone within the organization discovers that inside information in conjunction with the postponement has been leaked to an individual/person, information about this shall immediately be emailed to the Issuer's CEO at the following email address: liselott.johansson@greaterthan.eu. The information that must appear in that email includes the same information that is included in the Issuer's event-specific insider list. If the information may remain confidential, the CEO shall be responsible for ensuring that these persons are included in the event-specific insider list. If the Issuer cannot ensure that the information can be kept confidential, the information shall be published in accordance with this Policy.



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- i. The Issuer shall, once the information is published, send a notice to Finansinspektionen and announce that it has postponed the relevant publication. The Issuer must be able to immediately present evidence that and how the requirements for deferral of the information have been met if Finansinspektionen requests access to the information. The Issuer's CEO is responsible for ensuring that this information is provided to Finansinspektionen without delay.

7. Transactions performed by persons in leading positions

- a. The Issuer on regulated markets and MTFs and OTFs is covered by the national regulations regarding transactions performed by persons in leading positions.
- b. Persons in leading positions at the Issuer consist of:
 - i. Member of the company's administrative, management or control body,
 - ii. Leading executives in the company (not a member of the above bodies), with regular access to inside information that directly or indirectly relates to the company and with the authority to make decisions at management level that affect the company's future development and business prospects.
- c. Close relatives of a person in a leading position consist of:
 - i. spouse or person considered equal to spouse in accordance with national law (also includes cohabitant),
 - ii. a child in the custody of the person in charge, in accordance with national law,
 - iii. a relative, who has shared the same household for at least one year at the date of the transaction, or
 - iv. foundations or trading companies whose management tasks are performed by a person in a leading position or related natural person, or who are directly or indirectly controlled by such person, or which have been established for the benefit of such person, or whose financial interests mainly correspond to the interests of a such person.
- d. The Issuer's responsibility is to:
 - i. The Issuer shall establish and maintain a list of persons in leading positions, as well as persons related to them.
 - ii. Notify the leading management in writing of their obligations under Article 19 of the MAR, which are set out in the section 'Responsibility of the leading management' below
 - iii. Responsible for granting / allowing exemptions from the trading ban (the "Trading Ban"). All persons classified as persons in leading positions with the Issuer are covered by the Trading Ban.
- e. The Trading Ban is a prohibition that applies to persons with a leading position at the Issuer. Relatives of leading executives of the Issuer who are not subject to the Trading Ban should also avoid trading in the Issuer's securities or related instruments in accordance with the Trading Ban. The Trading Ban means a ban on conducting transactions on behalf of oneself or another person in the Issuer's securities or related instruments for 30 calendar days prior to the publication of an interim report or year-end report that the Issuer is required to publish under national law or the regulations on the Trading Place. The Trading Ban is also



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applicable on interim reports that it is not required by law to publish, for example interim reports for the first and third quarters.

- f. The Issuer has the right to grant exemptions from the Trading Ban in certain circumstances. However, it is not enough for the person in question in a leading position to consider that there is an exception. Thus, an approval from the Issuer is required. Such circumstances may include external unexpected events beyond the control of the person concerned. Examples of such unexpected events are divorce or serious financial events such as tax debts arising unexpectedly, which means that the person in question is forced to sell his shares urgently. The Issuer's CEO is ultimately responsible for granting exemptions from the Trading Ban. If it is the CEO who requests the exemption, all ordinary board members of the Issuer must grant an exemption in writing. The CEO shall not participate in decisions that include his or her own exemption.
- g. Responsibility of the person in a leading position:
 - i. Report notifiable transactions to the Issuer and to Finansinspektionen,
 - ii. Notify related parties in writing of their obligations, as well as keep a copy of the notification (notifications by e-mail are considered to have been made in writing) for five years,
 - iii. Observe the Trading Ban to which the person in a leading position is a subject.
 - iv. Do not sell or buy financial instruments in the Issuer based on inside information on your own or anyone else's behalf.
 - v. Do not disseminate insider information about the Issuer and/or encourage others to trade financial instruments in the Issuer based on inside information.
- h. Persons in leading positions must report notifiable transactions that take place in shares and debt instruments issued by the Issuer, or derivatives or other financial instruments that are related to these instruments. Also includes transactions that take place within the framework of an endowment insurance.
- i. Reporting is only necessary when an aggregate transaction amount of EUR 5,000 has been reached during a calendar year.
- j. The person in a leading position must report reportable transactions partly to the Issuer and partly to Finansinspektionen. This must be done no later than three (3) business days after the transaction has taken place. First, reporting must take place on Finansinspektionen's website. The receipt received at the time of reporting must then be sent to the Issuer. The issuer must, in accordance with clearly established routines, archive information on transactions for a period of at least five (5) years from the time the information is received.
- k. An insider person who wishes to trade shares in the Issuer must contact the CEO or Chairman of the Board to advise whether it is a suitable time for trading, before trading takes place.

8. Insider list

- a. The Issuer shall be responsible for establishing an insider list when the need arises in accordance with MAR. An insider list shall be established when events occur to give persons



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working for the Issuer access to inside information. The purpose of the insider list is to give the Issuer control over which persons have access to inside information concerning the Issuer. The CEO is responsible for ensuring that the insider list is prepared in accordance with current regulations and that this is updated as soon as the need arises.

- b. The list of insiders consists of a list of all persons who have access to inside information, and who work for them, through employment contracts or otherwise perform tasks through which they have access to inside information, such as advisers, auditors or credit rating agencies.
- c. The Issuer shall without delay update the insider list and submit the insider list to Finansinspektionen as soon as possible at the request of the authority.
- d. When specific inside information arises in the Issuer regarding a particular event, and this is not published, an event-driven insider list shall be prepared.
- e. The Issuer shall establish a permanent insider list which shall include the board and management team.
- f. The Issuer shall establish insider lists in accordance with the templates for the design of insider lists contained in Commission Implementing Regulation (EU) 2016/347.
- g. The insider list shall be in electronic format and access to it shall be limited. The Issuer must ensure that access is limited by only those who are registered to keep an insider list having access to the list.
- h. The Issuer shall ensure that persons entered in the insider list confirm in writing that they have received the information and that the person in question understands the meaning of this. The documentation must be kept for five (5) years by both parties. The Issuer must therefore inform the counterparty that it should save the documentation for five (5) years.
- i. The insider list shall be kept for five (5) years after it has been drawn up or after it has been last updated.
- j. The Issuer must ensure that it always has full access to the insider list. If an advisor has an underlying insider list the Issuer bears the full responsibility for this and must always have full access to it.

9. Market research

- a. Market research is an interaction between a seller of a financial instrument and one or more potential investors before a transaction is announced, in order to assess potential investors' interest in a possible transaction and its pricing, size and structuring. Market research may include an IPO or subsequent offering of securities and differs from ordinary trading. They are very valuable tools for assessing the opinions of potential investors, improving the dialogue between shareholders, ensuring that trading works smoothly and that the opinions of Issuers, existing shareholders and potential new investors are reconciled.
- b. Carrying out market research may require inside information to be provided to potential investors. Before the survey begins, the Issuer must assess whether that market survey will involve the provision of inside information. If this is the case, an insider list must be drawn up. The CEO is responsible for making this assessment and for establishing and following the necessary routines regarding market research.



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- c. When probing, the Issuer shall inform about MAR and that the recipient may not trade on the information provided.
- d. Upon completion of the market research, the Issuer shall inform when the insider position has ceased.
- e. Persons who receive probing must independently assess whether it is inside information and inform if information is not desired to be received.
- f. Both the surveyor and the person receiving the market research must document what the parties agree on. Both parties must save the documentation from the market research for five (5) years.
- g. The Issuer must use Certified Adviser recommended templates for how documentation is to be done during probing.

10. Routines in the event of market rumors

- a. The Issuer's main principle is not to comment on issues, speculations and rumors in the market that pertain to the Issuer. Rumors covered by this may or may not be substantiated.
- b. Market rumors and/or speculations regarding the Issuer may arise without any information being leaked by the Issuer. The Issuer has no obligation to act on rumors that are irrelevant or based on false and misleading information from persons outside the Issuer's control. In such situations, the Issuer may choose not to comment on the rumors.
- c. When a rumor is sufficiently concrete and is deemed to have sufficient substance to indicate an information leak, and regardless of where the confidential information originates, the inside information must be made public as soon as possible.
- d. There may be situations when a false reputation has a significant impact on the Issuer's share price and when the Issuer, after consultation with Certified Adviser and the Trading Place, can choose to provide the market with correct information and thereby create conditions for the share to be traded again at the "right price".
- e. The CEO is responsible for decisions on whether publications regarding rumors are to be made and for the information published in conjunction with this.
- f. The Trading Place's regulations must always be the basis for the Issuer's decision.

11. Other routines

- a. The CEO is responsible for the inside information in the form of press releases, interim reports and annual reports being published without delay in a non-discriminatory manner to the public.
- b. An established electronic news distributor is used for distribution and approved by the Trading Place, which ensures that the Trading Place, the media and the general public can simultaneously access published information without delay.
- c. The CEO is responsible for the preparation and compilation of interim reports, year-end reports and annual reports as well as other financial information.
- d. Interim reports and year-end reports are also published as a press release where inside information is compiled in a press release and the report is attached in its entirety.
- e. A press release is only commented on by the CEO.



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- f. The press release must always contain the name of the Issuer's Certified Adviser as well as contact information for the responsible informant.
- g. Press releases that contain inside information and/or information published in accordance with MAR must clearly announce this in the press release.
- h. Press releases and reports are posted on the Issuer's website as soon as possible after publication.
- i. Press releases are published in Swedish and/or English.
- j. All communication with the financial market and media on behalf of the Issuer takes place exclusively through the Issuer's CEO, Sten Forseke or the Communications Manager. Other employees and executives within the Issuer who are contacted by investors, shareholders, analysts or the media must always refer directly to the CEO without further comment. Subsidiaries, and employees in the subsidiaries, within the Group do not communicate with the media without the CEO's approval.
- k. The CEO is responsible for the Issuer's website. The website must be updated with the necessary information in accordance with the Trading Place's requirements. The website must contain all inside information that the Issuer is required to publish in accordance with applicable laws and regulations, such as press releases, financial reports, information from the Annual General Meeting, the Articles of Association, and ownership and contact information. The inside information must be clearly separated from other press releases on the website and the press releases must be organized in chronological order. The inside information must be kept on the website for five (5) years, except for financial reports which must be kept on the website for at least ten (10) years from the time of publication. The CEO is responsible for ensuring that the website contains current and correct information. The website is www.greaterthan.eu.

12. Information that must be given to the Certified Adviser

- a. Request from the Issuer's auditor regarding situations that may be relevant to the valuation of the Issuer's share.
- b. The Issuer shall notify the Certified Adviser as soon as possible of new issues, name changes, splits and other similar events.
- c. The Certified Adviser is in turn responsible for notifying the Trading Place, which ensures that the information is disseminated to the market via stock exchange announcements.
- d. When admitting new financial instruments for trading on the Trading Place, i.e., subscription rights, paid subscribed shares (BTA), units, warrants, purchase rights etc. The Trading Place needs five (5) trading days to include the instruments for trading in the INET system. This means that the Certified Adviser needs the information at least six (6) trading days before the trade is expected to begin.
- e. If the Issuer decides to postpone the publication of inside information, the Certified Adviser shall be contacted.



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13. Information to the Certified Adviser and the Trading Place

- a. If the Issuer intends to acquire another listed company or alternatively that the Issuer has received information that another party intends to acquire the Issuer, the Certified Adviser and the Trading Place must be informed.
- b. If the Issuer intends to publish information that may significantly affect the Issuer's share price, the Certified Adviser and the Trading Place shall be informed before the publication takes place.
- c. If the Issuer's Board decides to apply for delisting of its financial instruments from the Trading Place, the Certified Adviser and the Issuer shall be contacted immediately.

14. Crises

During a crisis situation or in the event of negative publicity, it is primarily the CEO who decides the media strategy and secondarily the chairman of the board. The trading venue and the Issuer's Certified Adviser should be contacted immediately for advice.