

Information policy Lime Technologies AB (publ)

Adopted by the Board of Directors of Lime Technologies AB (publ) on 21 April 2026, to remain in force until further notice.

Version	2.0
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Confidentiality level	External
Owner	Head of Communications & IR
Approved by	The Board of Directors



1 Background

1.1 This information policy (the "**Information Policy**") replaces the previous information policy of Lime Technologies AB (publ) (the "**Company**"). Its purpose is to clarify how the Company communicates, in all forms. All communication shall support the Company's business objectives and values, and contribute to enabling an accurate external assessment of the Company. Communication shall be coordinated, proactive, and characterised by openness, credibility and clarity.

The Company's shares are listed on Nasdaq Stockholm. This means the Company is subject to, among other things:

- The Nasdaq Stockholm Rulebook for Issuers (the "**Exchange Rules**")
- The Swedish Act on Penalties for Market Abuse on the Securities Market (2016:1307)
- The Swedish Act with Supplementary Provisions to the EU Market Abuse Regulation (2016:1306)
- The EU Market Abuse Regulation (MAR, Regulation 596/2014/EU)

2 Scope and Responsibilities

2.1 This Policy applies to all employees of the Company and covers both written and verbal communication. It should be seen as guidance – not a rulebook – and applied with good judgement in internal and external contexts.

2.2 The CEO and the Chairman of the Board bear ultimate responsibility for ensuring the Company complies with this Policy and applicable laws in its external communication. The Company's Head of Investor Relations and CFO are responsible for informing the organisation about the Policy and following up on compliance. Each employee is responsible for staying informed and adhering to the Policy.

3 Spokespersons

3.1 The Company's CEO is the primary spokesperson for the Group. Other members of Group management may, with the CEO's approval, act as spokespersons within their respective areas of responsibility.

3.2 The Chairman of the Board is the spokesperson on matters relating to ownership and the work of the Board.

3.3 The CFO and Head of Investor Relations may comment on the Group's financial position. They are also responsible for distributing relevant information to the capital market and other stakeholders – such as media, authorities, opinion leaders and the Company's own employees.

3.4 Employees who are contacted by journalists, financial analysts or shareholders shall refer them to the CEO, CFO or Head of Investor Relations. Employees shall also immediately notify the CEO, CFO or Head of Investor Relations if they are contacted by media or become aware of anything that may be of interest to media.

4 Disclosure of Information

4.1 Inside Information

4.1.1 The Company shall disclose information about decisions or events classified as inside information as soon as possible. Inside information means specific information that:

- has not been made public,
- directly or indirectly relates to the Company or a financial instrument connected to the Company, and
- would likely have a significant effect on the price of the instrument if it became known.

Examples of situations that may typically constitute inside information are set out in the Company's Insider Policy, section 3.3. The list is not exhaustive.

4.1.2 Inside information may arise during the preparation of interim reports and year-end reports. Information about Group revenues is typically such information. The Company shall therefore normally assess whether delayed disclosure is possible (see section 4.3) and, if so, establish an insider list once revenue figures have been determined. This does not apply if the Company in an individual case concludes that the information does not constitute inside information.

4.1.3 An employee who gains access to potential inside information shall immediately contact the CEO and/or CFO. They are responsible for making the assessment and taking necessary action. The information shall under no circumstances be shared with any other person, whether internally or externally.

4.2 Public Disclosure of Information

4.2.1 Information shall be disclosed in a manner that gives the public rapid, complete and accurate access to it. All disclosed information shall be published chronologically on a dedicated section of the Company's website, with a clearly stated date and time. The Company shall not combine the disclosure of inside information with marketing activities. Disclosure shall be made through press releases.

4.2.2 All disclosed information shall remain available on the Company's website for a minimum of five years. Financial reports, corporate governance reports and sustainability reports shall be available for a minimum of ten years.

4.3 Delayed Disclosure of Inside Information

4.3.1 The general rule is that inside information shall be disclosed as soon as possible. Under certain conditions, the Company may delay disclosure. Delay is only permitted if:

- (a) immediate disclosure would likely prejudice the Company's legitimate interests,
- (b) the delay would not mislead the public, and
- (c) the Company can ensure that the information remains confidential.

4.3.2 Delayed disclosure may be permitted where it protects the Company's legitimate interests – for example, during ongoing negotiations – provided that the public is not misled and confidentiality can be maintained. Delay is not permitted where the information deviates materially from previously communicated targets or expectations. The assessment

is made on a case-by-case basis by the CEO and CFO, if necessary in consultation with legal counsel and Nasdaq Stockholm. Detailed criteria and examples are set out in the Company's Insider Policy.

4.3.3 The Company may only delay disclosure if confidentiality can be ensured. Inside information may only be shared with persons who are obliged not to disclose it (e.g. by law, professional ethics or contractual obligation). The Company's IT systems shall be designed to restrict access to inside information to those who need it.

4.3.4 Decisions on delayed disclosure are made jointly by the CEO and CFO. If only one of them is available and a decision is urgent, that person may make the decision alone in exceptional circumstances.

4.3.5 Conditions are assessed on a case-by-case basis. In cases of uncertainty, the Company's legal counsel shall be consulted before contacting Nasdaq Stockholm. Contact with Nasdaq Stockholm may only be initiated by the Chairman of the Board or the CEO.

4.3.6 Decisions on delayed disclosure shall be documented in the Company's insider management system (currently InsiderLog). Documentation shall enable subsequent determination of the time of the decision, who made it, and the grounds on which the conditions for delayed disclosure were met. At the request of the Swedish Financial Supervisory Authority (Finansinspektionen), the Company shall provide a written explanation of how the conditions for delayed disclosure were satisfied.

4.3.7 When a decision on delayed disclosure has been made, an insider list shall be established (if not already in place) covering all persons with access to the information. These persons shall be instructed to:

- (a) not handle or store the information in locations or on devices accessible to unauthorised persons,
- (b) exercise particular caution when printing inside information,
- (c) carefully verify recipients when communicating by email, and
- (d) not discuss inside information where unauthorised persons may overhear.

Immediately upon public disclosure of delayed inside information, Finansinspektionen is automatically notified via the Company's insider management system (currently InsiderLog). The Company is responsible for verifying that a confirmation email from Finansinspektionen has been received.

4.3.8 Insider lists contain personal data and shall be handled in accordance with the EU General Data Protection Regulation (GDPR, 2016/679/EU). This means that:

- Personal data may only be processed for the purpose for which it was collected (i.e. compliance with MAR requirements).
- Data shall be protected against unauthorised access and stored securely in the Company's insider management system (currently InsiderLog).
- Lists shall be deleted or anonymised when no longer required, unless other legislation requires a longer retention period.
- Registered individuals shall be informed about the processing of their personal data in accordance with GDPR Articles 13–14.

The CFO is responsible for ensuring that the handling of insider lists complies with both MAR and GDPR.

4.4 Selective Disclosure

4.4.1 The Company shall ensure that all participants in the capital market have simultaneous access to inside information. Inside information shall be treated as confidential until disclosed – it shall not be shared with analysts, journalists or others without simultaneous public disclosure.

An exception applies where inside information is shared as a natural part of the performance of a duty, and the recipient is bound by an obligation of confidentiality (e.g. advisers in connection with a transaction or prospectus). This exception shall be applied restrictively.

4.4.2 In cases of selective disclosure, the Company shall:

- Register the recipient in the insider list.
- Inform the recipient that they have access to inside information, what this means legally and what sanctions may apply in case of misuse.
- Enter into a confidentiality agreement if an obligation of confidentiality does not already follow from law or professional ethics.

See also the Company's Insider Policy.

4.5 Financial Reporting

4.5.1 The Company discloses financial reports in accordance with the Exchange Rules and other applicable laws and regulations. All financial reporting to the market is made exclusively through the annual report, year-end report and interim reports.

4.5.2 The annual report, year-end report and interim reports shall:

- Be disclosed as press releases.
- Be prepared in Swedish, in accordance with applicable laws and generally accepted accounting principles.
- Be approved by the Board of Directors before being communicated externally.

All information relating to upcoming reports is confidential until the time of disclosure – this applies to all employees and Board members.

4.5.3 The year-end report and interim reports shall be disclosed as soon as possible, and no later than two months after the end of the reporting period.

4.6 Silent Period

4.6.1 Lime Technologies observes a silent period of 30 calendar days prior to the publication of each financial report (year-end report and interim reports).

4.6.2 During the silent period, the Company shall not:

- Respond to questions about or comment on financial performance.
- Hold meetings with investors, analysts or financially-oriented media.
- Issue forecasts, guidance or comments that could influence market expectations.

4.6.3 During the silent period, no employee or Board member is permitted to buy or sell shares or other financial instruments in the Company. See also the Company's Insider Policy.

4.6.4 Head of Investor Relations is responsible for communicating the start and end dates of each silent period to all employees well in advance. Silent period dates are not published externally.

5 Information Leaks and Rumours

5.1 Information leaks and rumours can cause significant damage – costly disruptions, negative publicity and loss of trust. The Company's default position is not to comment on information it has not itself published. Any indication of rumours or leaks of a non-trivial nature shall be immediately reported to the CEO, who is responsible for taking necessary action. No decisions, activities or statements may be made by anyone other than the CEO or the Chairman of the Board.

5.2 If a rumour explicitly relates to inside information whose disclosure has been delayed, and the rumour is sufficiently precise to indicate that confidentiality can no longer be guaranteed, the Company shall disclose the inside information as soon as possible.

5.3 If inside information leaks prior to disclosure, the Company shall:

1. Notify the CEO immediately.
2. The CEO contacts the market surveillance function at Nasdaq Stockholm.
3. The CEO informs the Board of Directors.
4. The CEO decides – in consultation with Nasdaq Stockholm – whether clarifying information should be disclosed.
5. Information handling procedures are evaluated and updated as necessary.

6 General Meeting of Shareholders

6.1 Once the date and venue of the Annual General Meeting (AGM) have been determined, this information shall be published on the Company's website without delay – and no later than in connection with the third quarter report. The website shall also state the deadline by which shareholders must submit requests for items to be included on the agenda.

6.2 Notice of a general meeting (AGM or Extraordinary General Meeting) shall be issued in accordance with the Articles of Association and the Swedish Companies Act (2005:551). The notice shall be disclosed as a press release and published on the Company's website.

6.3 Proposals for resolutions at a general meeting that contain inside information shall be disclosed as soon as possible – even if the proposal will subsequently be included in the notice. Disclosure of a notice containing inside information may not occur later than when the notice is submitted to a newspaper for publication.

6.4 Immediately following the general meeting, a press release shall be published summarising the most important resolutions (e.g. dividend, changes to the Board, change of auditor and other information of material significance to the capital market). The press release shall be published on the Company's website.

7 Press Releases

7.1 General

7.1.1 All press releases shall include:

- Time and date of disclosure
- The Company's full legal name
- The Company's website address
- Contact person (name, title and contact details)
- A clear headline summarising the content
- An introductory summary
- The most material information presented clearly at the beginning
- Where applicable, a reference to the relevant law or regulation under which the information is disclosed. Standard texts for such references are set out in Lime's internal style guide for press releases, maintained by Head of IR.

7.1.2 Press releases concerning acquisitions or disposals of businesses shall include:

- Purchase price, unless special circumstances apply. Special circumstances include, for example, where the transaction value is of a smaller magnitude, where the parties have agreed to confidentiality, or where disclosure would prejudice the Company's commercial interests. The assessment is made by the CEO in consultation with the CFO. In cases of uncertainty, legal counsel shall be consulted.
- Payment terms
- Relevant information about the acquired or divested business (principal activities, history and financial position)
- The rationale for the transaction
- The assessed impact on the Company's operations
- The timeline for the transaction
- Key conditions or prerequisites for the transaction

7.1.3 The Company shall as a minimum disclose the following by press release:

- Inside information
- Transactions with related parties
- Notices of and communications from general meetings
- Changes to the Board or management, change of auditor, entering into or termination of agreements with a liquidity provider
- Decisions on incentive programmes
- Decisions on new share issues or convertible instruments
- Admission to or delisting from any other marketplace than Nasdaq Stockholm
- A qualified or non-standard auditor's report

7.2 Approval of Press Releases

All press releases shall be approved by the CEO. The Chairman of the Board reviews press releases on important matters and significant events, and determines the extent of the rest of the Board's involvement.

7.3 Notification to Nasdaq Stockholm and Finansinspektionen

Inside information shall be provided to Nasdaq Stockholm and Finansinspektionen no later than simultaneously with its public disclosure, via the Company's designated news distributor (currently ViaTT).

7.3.1 If the Company intends to disclose inside information of extraordinary significance, Nasdaq Stockholm shall be notified as soon as possible before the information is made public.

8 Website

8.1 The Company's website shall contain:

- **Press release archive** covering all legal, financial and capital market-related information, searchable and filterable to separate regulated disclosures from marketing material. The archive shall cover a minimum of five years.
- **Financial reports** available for a minimum of ten years, published under both "Financial Reports" and "Press Releases".
- **General meeting information:** date, venue and deadline for shareholder proposals – published without delay, and no later than in connection with the Q3 report ahead of the AGM.
- **Financial calendar** with dates for the year-end report, interim reports, annual report and next AGM. The calendar shall be published before the start of the financial year. If a date changes, the new date shall be published as early as possible, and no later than one week before the original date.

8.2 The website shall have a dedicated corporate governance section containing governance reports (ten years), the Articles of Association, information about the Board, CEO and auditor, information about remuneration and incentive programmes, general meeting minutes, and the Nomination Committee's composition and proposals. Detailed requirements for the content of each section are set out in the Exchange Rules and the Swedish Corporate Governance Code, and are managed by Head of Investor Relations and CFO in accordance with a separate internal checklist.

8.3 Head of Investor Relations and CFO are responsible for keeping the website updated in accordance with the Exchange Rules, the Swedish Corporate Governance Code and other applicable requirements.

9 Crisis Management

In the event of a serious accident, crisis or potential crisis that may affect the Company, the CEO shall be immediately notified and shall take necessary action. No decisions, activities or statements may be made by anyone other than the CEO or the Chairman of the Board. Group management shall act as the crisis management team. For incidents of a technical or operational nature, reference is made to the Company's Major Incident Response Procedure.

10 Internal Information

Well-informed employees are more engaged and contribute more effectively to the Company's success. All employees should stay informed about:

- The Company's overall objectives.
- Their own team's and department's goals and role within the Company.
- Applicable laws, regulations and internal procedures for handling inside information.

Employees shall know where to find relevant information. Guidelines for the Company's information channels shall be readily accessible, and the Company provides a summarising overview in the form of *"Insider & information at Lime – in a nutshell"*. Good internal communication reduces unnecessary rumour.

This Information Policy and the Company's Insider Policy apply to all internal communication. To the extent compatible with these policies and applicable laws, the following shall apply:

- Managers are responsible for communicating relevant information to their teams.
- Employees shall be regularly updated on their team's and the Group's objectives and direction.
- Employees shall receive information about financial, management and product-related news – preferably in person where possible, as this is the most effective communication channel.

10.1 Channels and Types of Internal Information

Internal information is shared through the following channels: quarterly all-staff meetings, departmental meetings (preferably monthly), email, digital channels (e.g. Microsoft Teams) and Lime Prime.

Information may be work-related, general company news, targeted at specific groups – or inside information. Inside information is subject to specific rules under section 4 and the Company's Insider Policy and may not be shared internally in the same way as other information.

11 Policy Violations

Violations of this Policy shall be reported to the Company's CEO.

12 Document Owner

The Board of Directors shall adopt this Policy and review it regularly. The CEO bears overall responsibility for ensuring that the Company complies with this Policy and applicable laws and regulations in relation to external communication and information disclosure. Head of Communications & IR is the document owner and is responsible for the operational implementation, maintenance and follow-up of this Policy, in close collaboration with the CFO, including ensuring the Policy is regularly reviewed and submitted to the Board for adoption. Each employee is responsible for staying informed about and complying with this Policy.