

Insider 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.

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Confidentiality level	External
Owner	CFO
Approved by	The Board of Directors



1 Background

1.1 This insider policy (the "**Insider Policy**") for Lime Technologies AB (publ) (the "**Company**") has been established to serve as guidance for persons discharging managerial responsibilities, employees and others who may come into contact with inside information relating to the Company.

1.2 Anyone trading in financial instruments issued by the Company must comply with:

- Swedish laws and regulations on securities trading
- The Nasdaq Stockholm Rulebook for Issuers
- The Swedish Act with Supplementary Provisions to the EU Market Abuse Regulation (2016:1306)
- The Swedish Act on Penalties for Market Abuse on the Securities Market (2016:1307)
- The EU Market Abuse Regulation (MAR, 596/2014/EU)

1.3 The Company's approach to insider matters is critical to both regulatory compliance and the confidence of the capital market in the Company. It is important that all those concerned – employees, persons discharging managerial responsibilities and others who may come into contact with inside information – read and comply with this Policy.

1.4 To avoid acting in breach of this Policy or applicable laws and regulations, the CFO shall always be consulted prior to trading in financial instruments issued by the Company.

1.5 If this Insider Policy conflicts with applicable laws and regulations, such laws and regulations shall take precedence.

1.6 References in this Policy to the Company's shares shall, where applicable, also apply to trading in other financial instruments linked to the shares.

2 Definitions

2.1 Person Discharging Managerial Responsibilities (PDMR)

2.1.1 A "**person discharging managerial responsibilities**" (PDMR) is a person who is:
(a) a member of the Company's administrative, management or supervisory body, or
(b) a senior executive who is not a member of the bodies referred to in (a), but who has regular access to inside information directly or indirectly relating to the Company and the power to make managerial decisions affecting the Company's future development and business prospects.

2.1.2 The following persons shall always be considered PDMRs:

- (a) Members of the Board of Directors and any deputy members,
- (b) The Company's CEO and deputy CEO (if any),
- (c) Members of management or persons holding other senior positions of a permanent nature, where such position may normally be expected to involve the ability to make decisions affecting the Company's future development and business prospects, and
- (d) Officers in subsidiaries, where such persons may be expected to have the ability to make such decisions.

2.1.3 At the time of the Board's adoption of this Insider Policy, the following are considered to be PDMRs:

(a) The Company's Board members,
(b) The Company's CEO and CFO,
(c) The remaining members of Group management and the extended management team – comprising Head of Communications & IR, CMO, Head of People & Culture, CPO, Head of M&A & Strategy, Business Unit Director Lime Go, Business Unit Director Lime Connect and Business Unit Director Lime Sportadmin – are **not** considered to be PDMRs. These individuals participate in operational management and may from time to time have access to information that constitutes or may constitute inside information, for example within the scope of strategic projects, but do not have independent decision-making authority over the Company's overall strategy or business development.

2.2 Closely Associated Person

A "**closely associated person**" means a spouse or equivalent partner, children in custody, and relatives sharing the same household for at least one year at the date of a transaction. Legal persons controlled by, established for the benefit of, or whose economic interests mainly correspond to those of a PDMR are also considered closely associated persons. The full definition is set out in MAR Article 3.1.26.

3 Inside Information

3.1 "Inside information" means information of a precise nature which has not been made public, which directly or indirectly relates to the Company or a financial instrument issued by or linked to the Company, and which, if made public, would likely have a significant effect on the price of those financial instruments or related derivative instruments.

3.2 In relation to ongoing processes, both intermediate steps and final outcomes may constitute inside information if they in themselves satisfy the criteria above. Inside information may therefore exist well before a formal signing or a formal decision.

3.3 The following are examples of situations that may typically constitute inside information. The list is not exhaustive.

- **Investment decisions, acquisitions or disposals of companies, new joint ventures**
E.g. Lime buying or selling a company, or entering into a strategic partnership with another business.
- **Material agreements, collaboration agreements or regulatory decisions**
E.g. a major customer contract, an important partnership agreement, or a regulatory decision affecting Lime's operations.
- **Legal disputes and court rulings**
E.g. Lime initiating or being subject to legal proceedings, or a ruling that may affect the Company.
- **Financial difficulties or a material change in results**
E.g. Lime performing significantly better or worse than expected, or encountering liquidity issues.
- **Fundamental changes to the business**
E.g. a major reorganisation, a new strategy or a change in business model.
- **Financial reports, market maker agreements, shareholder agreements**
E.g. the content of an interim report before it has been published, or agreements affecting trading in Lime shares.

- **Information relating to subsidiaries and associated companies**

E.g. material events in one of Lime's subsidiaries that indirectly affect the value of the Group.

Remember: If you are unsure whether information you have access to may be inside information – always contact the CEO or CFO before taking any action.

3.4 As a general rule, inside information shall be disclosed as soon as possible. Under certain conditions, disclosure may be delayed. For further information, please refer to the Company's Information Policy.

3.5 The CEO has ultimate responsibility for determining what constitutes inside information. To assist the CEO, the Company has established an insider committee comprising the CEO, CFO and Head of Communications & IR (the "Insider Committee"). The Committee convenes as needed. If the Insider Committee is unable to convene in an urgent matter, the CEO and CFO may each individually take necessary decisions pending the Committee's next meeting.

4 Reporting of Transactions

4.1 Responsibilities

4.1.1 The Company shall continuously identify all PDMRs and notify them in writing of their reporting obligations via the Company's insider management system (currently InsiderLog). The Company shall maintain a register of all PDMRs and their closely associated persons in the same system. The register shall be provided to the Swedish Financial Supervisory Authority (Finansinspektionen) upon request.

4.1.2 PDMRs shall:

- (a) Promptly acknowledge receipt of the notification via the link sent from the Company's insider management system (currently InsiderLog).
- (b) As soon as possible, notify their closely associated persons in writing of their reporting obligations, using the information distributed from the system (exception: minor children do not need to be notified, but must still be registered).
- (c) Inform the Company of the identity of their closely associated persons via the form available in the Company's insider management system (currently InsiderLog).
- (d) Report transactions in the Company's financial instruments in accordance with applicable laws and regulations.

4.2 Reporting Obligations

4.2.1 PDMRs and their closely associated persons shall – as soon as possible and no later than three business days after the transaction – notify the Company and Finansinspektionen of every transaction carried out on their own account in the Company's shares or debt instruments.

4.2.2 Reporting to Finansinspektionen is made via Finansinspektionen's website (www.fi.se) using a personal user profile. A profile should be created even if there is currently no intention to trade. Confirmation of a completed report shall be sent to the Company at ir@lime.tech. Guardians shall report transactions on behalf of minor children.

4.2.3 Failure to comply with reporting obligations may result in sanctions from Finansinspektionen.

5 Trading Prohibitions and Silent Period

5.1 Trading Prohibition for PDMRs

5.1.1 During the 30 calendar days prior to the publication of an interim report or year-end report – including the day of publication, until the report has been released – PDMRs are prohibited from carrying out transactions in the Company's shares, for their own or a third party's account, directly or indirectly. This trading prohibition does not apply to closely associated persons of PDMRs.

5.1.2 Under exceptional circumstances, the Company may grant an exemption from the trading prohibition. Before any such exemption is granted, the Company's legal counsel shall be consulted.

5.1.3 Transactions in breach of the trading prohibition may result in sanctions from Finansinspektionen.

5.2 Silent Period – Applies to All Employees

5.2.1 In addition to the trading prohibition for PDMRs under section 5.1, the Company applies an internal trading prohibition for **all employees** during the silent period. This is a voluntary commitment that goes beyond the minimum requirements of MAR and is intended to strengthen market confidence in the Company.

5.2.2 The silent period covers the 30 calendar days prior to the publication of each financial report (year-end report and interim reports).

5.2.3 During the silent period, no employee is permitted to buy or sell shares or other financial instruments in the Company.

5.2.4 Head of Communications & IR 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.

6 Prohibition on Insider Trading

6.1 Any person in possession of inside information is prohibited from trading in the Company's shares, for their own or another's account. It is also prohibited to recommend or induce another person to trade, or to disclose inside information – except where disclosure occurs as a natural part of the performance of a duty or obligation. It is further prohibited to spread false information or otherwise mislead buyers or sellers of the Company's shares.

6.2 A person with access to inside information may not share it with closely associated persons or any other third party. Internally, inside information may only be shared with those who strictly need it to perform their duties.

6.3 Where inside information is shared in accordance with sections 6.1–6.2, the disclosing party shall inform the recipient that the information constitutes inside information and register that person in the Company's insider management system (currently InsiderLog). External recipients must also have entered into a confidentiality agreement.

6.4 Persons who breach the above prohibitions may be convicted of insider trading, aggravated insider trading or unlawful disclosure of inside information, which may result in fines or imprisonment.

7 Management of Insider Lists

7.1 The Company shall establish and continuously update insider lists for each event constituting inside information. Lists are maintained in the Company's insider management system (currently InsiderLog). The CFO is responsible for the lists and may delegate operational responsibility. Lists shall be provided to Finansinspektionen upon request. Detailed procedures for the establishment, updating, access, retention and notification processes are set out in the Company's internal procedure document for insider lists.

7.2 GDPR and the Handling of Insider Lists

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.

8 Whistleblowing

Employees and others who become aware of potential violations of this Policy or applicable laws and regulations are encouraged to report this. For information on how to report, please refer to the Company's separate **Whistleblower Policy**, available on the Company's website and on Lime Prime.

9 Policy Violations

Violations of this Policy shall be reported to the CEO or CFO.

10 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 inside information, disclosure and insider list management. The CFO is the document owner and is responsible for the operational implementation and maintenance of this Policy, including the insider list process and 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.