

## **INVESTOR RELATIONS POLICY**

*Adopted by the Board of Directors on 10 February 2022*

### **1 PURPOSE**

Techstep's investor relations (IR) policy sets the basic principles for the company's communication and dialogue with capital markets participants. The IR policy shall help Techstep build trust and stakeholder confidence by ensuring that IR activities are conducted in compliance with prevailing rules, regulations and best practices, including the latest version of Oslo Børs' Code of Practice for IR.

Techstep shall be perceived as an accessible, reliable, and professional company by providing present and potential investors with factual, relevant, timely and comprehensive information. Communication with the stakeholders shall be based on the principles of equal treatment and transparency in order to build trust and stakeholder confidence.

Techstep's IR activities shall assist capital markets participants to obtain an informed view on Techstep as an investment case, including its financial situation and prospects, with the aim to reduce the cost of capital and support a fair valuation of the company's securities.

### **2 ROLES AND RESPONSIBILITIES**

Techstep's Investor Relations team (IR team) comprises the CEO, CFO and the Chief Transformation Officer.

The responsibility for the company's IR activities lies with the CFO, including contact with third parties relating to the company's financial results, strategy, legal processes, acquisitions or sales, or any other kind of relevant activities.

The CFO is also responsible for regularly initiating updating of this policy upon changes in the stock exchange regulations, the Norwegian Securities Trading Act, the EU Market Abuse Regulations (MAR) or the Norwegian Code of Practice for Corporate Governance. The IR policy is subject to an annual review by the Board.

Authorised spokespersons for IR related matters:

- Chairman
- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO)
- Chief Transformation Officer

### **3 INVESTOR CONTACT AND COMMUNICATION WITH THE CAPITAL MARKET**

The IR team is responsible for the day-to-day contact with Techstep's capital market stakeholders (i.e. investors, analysts and financial media) on behalf of the company. Questions from investors and financial analysts to other Techstep employees shall be referred to the IR team. The IR team is also responsible for contact with larger shareholders and shall facilitate that these shareholders get the opportunity to provide direct feedback and discuss special topics. The IR team will in such cases ensure consistent and simultaneous information to all shareholders through the suitable channels.

Such dialogue should also contribute to the management and the Board of Techstep obtaining relevant information about the market's views and opinions on Techstep.

## **4 GENERAL PRINCIPLES**

Disclosure and reporting to the financial markets and contact with shareholders, investors and analysts shall be based on the following main principles:

### **4.1 Compliance with laws and regulations**

All disclosure, communication and reporting shall comply with applicable laws and regulations, in particular the Norwegian Securities Trading Act, the Norwegian Accounting Act, Oslo Børs' continuing obligations for listed companies, and the EU Market Abuse Regulation ("MAR"). Techstep shall observe the Norwegian Code of Practice for Corporate Governance and comply with the relevant recommendations and market practices for reporting financial and other IR information, including the latest version of the "Oslo Børs' Code of Practice for IR".

### **4.2 Language**

All relevant financial and other IR information shall be published in English.

### **4.3 Channels**

Information about Techstep shall be given in the form of annual and interim reports, stock exchange releases, press releases and investor presentations in accordance with what is deemed appropriate from time to time. All such information shall be distributed to the stock exchange and published on the company's website, [www.techstepasa.com](http://www.techstepasa.com). Techstep shall offer a subscription service for stock exchange releases and press releases.

### **4.4 Presentations**

All presentations, i.e. regarding interim results, capital markets updates or seminars/conferences, shall as far as possible be open for all and be broadcasted via webcast. The presentations shall be made available on the company's webpage [www.techstepasa.com](http://www.techstepasa.com) shortly after the presentation is concluded. Presentations used for individual investor meetings shall not be materially different from those previously presented on the company's webpage.

### **4.5 Relevant information**

Techstep shall publish accurate, comprehensive and timely information about significant and relevant internal and external value drivers. Such information shall be balanced and consistent over time.

### **4.6 Reporting dates and quiet periods**

Techstep publishes interim financial reports in line with Oslo Børs' recommendations. The financial calendar is published annually on the company's website and to the stock exchange. 30 days ahead of disclosing its periodic results, Techstep maintains a quiet period. During this period, no investor/financial analyst meetings will be conducted.

### **4.7 Guiding**

Techstep will normally not guide the market on future performance or results, but it may publish selected financial targets, report progress accordingly and update such targets when appropriate.