

INVESTOR RELATION POLICY

Effective as of 3 June 2021, being the date of submission of the Company's listing application to Oslo Børs

Komplett ASA's (the "**Komplett**" or the "**Company**") investor relations policy (the "**IR Policy**") is based on Oslo Børs' rules, regulations and recommendations for listed companies, in particular the Oslo Børs Code of Practice for IR, last amended on 1 July 2019 (the "**IR Code**").

1 PURPOSE



As a listed company, the Company must comply with a number of laws and regulations, and it is important that the Company's investor relations personnel are aware of the relevant provisions.

The IR Policy has been established for the purpose of helping the Company build trust and awareness in its investor community by ensuring that investor relation activities are conducted in compliance with relevant rules, regulations and recommended practices.

The IR Policy helps the Company ensure that shareholders, potential investors, the market in general and other stakeholders shall gain simultaneous access to accurate, clear, relevant, comprehensive and up-to-date information about Komplett.

Good relations and an open, active dialogue with shareholders, potential investors, analysts and other participants in the capital markets shall build trust and contribute to reduced costs of capital for the Company. This IR Policy shall also contribute to the management and the Company's board of directors obtaining information about the market's views and opinion on Komplett.

The Company's investor relations team (the "**IR Team**") comprises the [chief executive officer and the financial officer, and if one is appointed by the Company, the person holding the position as investor relations officer].¹

2 SHAREHOLDER CONTACT AND COMMUNICATION WITH THE FINANCIAL MARKET



*All communication with shareholders of the Company shall be on an **equal treatment basis** and in compliance with applicable laws and regulation. The Company shall continually provide its shareholders, Oslo Børs and the securities and financial market in general with timely and precise information about the Company and its operations.*

The IR Team is responsible for all day-to-day contact with the shareholders on behalf of the Company.

Inside information shall be dealt with in compliance with the Company's instruction for handling of inside information. The IR Team may continually communicate with shareholders for the purposes of developing an understanding of which matters affecting the Company from time to time that are of particular importance to its shareholders. The IR Team will in such cases ensure that the communication with shareholders is in compliance with the provisions of applicable laws and regulations, and consistent with the principle of equal treatment of shareholders.

Relevant information about the Company shall be given in the form of annual reports, half-year reports, quarterly reports, press releases, notices to the stock exchange and investor presentations in accordance with what is deemed appropriate from time to time. All such information shall be published on the Group's investor website.

The Company shall offer subscription service for stock exchange announcements and press releases.

¹ IR team to be determined

3 POLICY

Komplett complies with the IR Code. Any future deviations from the IR Code will be explained, as required by the IR Code.

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

- **Compliance with laws and regulations.** All disclosure, communication and reporting shall be in compliance with the applicable laws and regulations, in particular the Norwegian STA, MAR, the Norwegian Accounting Act and the Rule Books. The Company shall also comply with the relevant recommendations and market practices for reporting financial and other IR information.
- **Inside information.** Unless exceptions apply and are invoked, the Company shall promptly disclose all inside information (as defined by article 7 of MAR).
- **Language.** All financial and other IR information shall be published in English. All stock exchange notifications shall be published in English.
- **Information on value drivers.** The Company shall publish accurate and relevant information about its historical earnings, operations, outlook and any other information that the Company has defined as significant and relevant for fair valuation of the financial instruments. Such information shall be balanced and consistent over time.
- **Guiding.** The Company shall not publish specific guiding on the Group's future financial results. The Company operates in accordance with a set of financial and non-financial strategic targets, established by the Company's board of directors. These targets govern the Group's operations within a defined strategic period.
- **Quiet period.** Investor and analyst meetings shall not be held in the last three weeks prior to the presentation of results. In the same period, no comments shall be made to the media or other external parties regarding the Group's earnings and outlook.
- **Information on the Company's website.** the Company shall comply with the principles of the IR Code in respect of disclosing information to shareholders and the market on the Company's website as further set forth therein. The Company shall follow the Norwegian Code of Practice for Corporate Governance, including the code's principles regarding transparency, equal treatment of shareholders and disclosure of relevant information. Information shall therefore be available on the Group's investor website and other places where it is relevant.

4 INVESTOR RELATIONS EVENTS AND ARENAS



In addition to making information easily available on a timely basis to shareholders and the financial markets in general, the IR Team shall prioritize raising awareness of, and interest in, the Company and its shares among various market participants – in Norway, and throughout the international market.

To help promote this goal, the deadlines, meetings and presentations set out in the table below shall be met/held.

Event	Description
Annual reports	<ul style="list-style-type: none">• Annual reports and presentations shall be available via webcast on the Group's investor website. The annual report for <u>the current as well as the preceding three years</u> shall be made available on the Company's investor website.• Annual reports shall be published within <u>four months</u> after the end of the financial year. The Company shall ensure that the annual report remains available and public for the

Event	Description
	following five years, as a minimum. It is recommended by the IR Code that the annual reports are published no later than <u>three months</u> after the end of the accounting period, unless the Company has released an interim report for the fourth quarter by this date.
Half year reporting	<ul style="list-style-type: none"> • Half-yearly reports for the first six months of the fiscal year shall be published <u>as soon as possible, and no later than two months</u> after the end of the financial period. • The Company shall ensure that the half-yearly report remains available and public for the following <u>three years</u>, as a minimum.
Quarterly reporting	<ul style="list-style-type: none"> • Quarterly reports for the first and third quarters shall be published <u>as soon as possible and no later than by the 15th day</u> of the second month after the accounting period in question. • Half-year and quarterly reports for the <u>current as well as the preceding three</u> years shall be made available on the Company's website.
Presentations	<ul style="list-style-type: none"> • Open results presentations shall be held for investors, analysts and other stakeholders. The presentations shall be available via webcast on the Group's investor website.
Financial calendar	<ul style="list-style-type: none"> • The reporting dates for annual, half-yearly and quarterly reports shall be stated in the Company's financial calendar, which also shall include the date of the ordinary general shareholders meeting. The financial calendar shall be published on www.newsweb.no (by making use of the "Financial calendar" in NewsPoint) and via webcast on the Group's investor website.
Investor and analyst meetings	<ul style="list-style-type: none"> • The Company shall hold regular meetings with investors and analysts. • The Company's ability to provide information about to individual market participants, including investors and analysts, is limited by regulations applicable to listed companies, including the rules on good stock exchange practices, and the general requirement of equal treatment. • All presentations used in the above mentioned meetings shall be available on the Group's investor website.
Capital Markets Day	<ul style="list-style-type: none"> • The Company will consider holding a capital markets day when appropriate to keep the market up to date on development, strategy and outlook. capital market days will be open to all who wish to attend, and the presentations will be made available on the Group's investor website.
Conferences, seminars, symposia, etc.	<ul style="list-style-type: none"> • Representatives from the Company's management will participate in various conferences and seminars where relevant. • All relevant presentations held by the Company's management will be published on the Group's investor website.
Company announcements	<ul style="list-style-type: none"> • Stock exchange announcements over the last three years (and/or link to the Company's announcements on www.newsweb.no) should be included on the Group's investor website.

5 INFORMATION AVAILABLE ON THE COMPANY'S WEBSITE

Pursuant to recommendations from the IR Code, the Company shall have the following information available at its investor website:

- (i) **Investor relations:** Description of the Company's investor information/investor relations policy. As a minimum this includes the IR policy information as set out in the Company's annual report on

corporate governance. The Company should also state to what extent it is compliant with the IR Code, and if deviation exists, so must be stated and explained in the investor relations section.

- (ii) **Articles of association:** The Company's articles of association.
- (iii) **Board of directors and senior executives:** Information about the members of the board of directors and senior executives which includes, as a minimum (i) name, year of birth, position, education and professional experience, (ii) how long each person has been members of the board of directors or have occupied their current position in the Company's senior management, and (iii) holdings of any shares/options/equity certificates issued by the Company.
- (iv) **Corporate governance:** Description of the Company's corporate governance policy, and as a minimum the Company should provide the annual report on corporate governance as required by the Oslo Børs' Issuer Rules.
- (v) **Corporate responsibility:** Description of the Company's corporate responsibility policy, in which the Company as a minimum should provide the annual report on corporate social responsibility as set out in the Company's annual report on corporate governance.
- (vi) **Shareholders/holders of equity certificates:** A list of the 20 largest shareholders, which also provides information about which of these shareholders who are registered through nominee accounts. The list should be kept updated at all times, but must as a minimum be updated on a monthly basis. Depending on the proportion of shares registered through nominee accounts, the Company should consider whether it would be appropriate to publish a list of beneficial owners based on the 20 largest shareholders on a regular basis, and at least once a year.
- (vii) **Price information:** Price information for the shares issued by the Company, allowing the possibility for comparison with relevant indices and any comparable issuers (peers/benchmark values). This can be readily arranged by adding a link to the Company's page on www.oslobors.no that shows price performance, history, volume, most recent trades, etc. or the Company may make use of a supplier that provides integrated price charts, etc. for its website.
- (viii) **Analyst coverage and consensus estimates:** To the extent that the Company chooses to publish investment research and estimates it should be clearly indicated that these are not the Company's own estimates and that the Company has not processed the content. The broking firms/analysts should be published. The Company should also explain what methodology it has used to produce the consensus estimates.
- (ix) **Notifiable primary insider trades:** A list of notifiable trades in the last 12 months (and/or a link to any notifiable trades in the Company's shares/equity certificates reported on www.newsweb.no). This applies to notifications from the Company's shareholders, and not from the Company itself. It is sufficient to post the notice in the language in which it was issued. If no notifiable trades took place during the last 12 months' period, this should be stated.
- (x) **Disclosure of large shareholdings:** Announcements of the disclosure of large shareholdings issued during the last 12 months (and/or link to any such "flagging announcements" in respect of the issuer on www.newsweb.no). The announcements of large shareholdings disclosures concern announcements made by the Company's shareholders, and not by the Company itself. It is sufficient to post the notice in the language in which it was issued. If no such disclosures were issued during the last 12 months' period, this should be stated.
- (xi) **General information about the share/equity certificate:** The Company's website should include the following information: (i) the type of legal entity and the national jurisdiction under which the Company is incorporated; (ii) the number of shares issued; (iii) the number of shares owned by the Company or by other group companies; (iv) whether the Company has more than one class of shares; and (v) the marketplace at on which the Company's shares are listed.

- (xii) **General meetings:** Notices of, documentation for, and minutes of, general shareholders meetings (ordinary and extraordinary) for the past three years.
- (xiii) **Dividends:** The following information concerning dividends should be available: (i) description of the Company's dividend policy; (ii) dividend amounts in the past three years, and if no dividends have been paid in one or more of the years in the three-year period, so should be stated; and (iii) dividend dates in the past three years, if dividends have been paid.
- (xiv) **Prospectuses:** Prospectuses and other information documents prepared in the past ten years should be posted on the Company's website. If there, in any three-years' period, have not been published any prospectuses or other information documents, so should be stated. If applicable legislation prevents historical prospectuses from being made available, the Company may instead provide a brief description of which prospectuses that have been prepared, when these were prepared, which transaction they referred to and from where a copy of the prospectus may be obtained.
- (xv) **Financial strategy:** The Company should provide a description of its financial strategy, e.g. information on its capital structure, sources of financing, collateral pledges/guarantees, gearing, and its policy for listing bond loans. The information should at a minimum be the same as provided in the annual report. If the Company does not have a financial strategy, this should be states.
- (xvi) **Information on the Company's debt financing:** The Company should provide information on its debt financing, including (i) list of the Company's various sources of financing, identifying the amounts outstanding in each case. The listing should specify listen bond loans, unlisten bond loans, bank financing and any other source of financing, (ii) terms of the interest rates payable on debt financing, including the interest margins on each loan, (iii) the major financial covenants that apply to the debt financing, and (iv) the official credit rating if the Company, o any of its individual bonds, has been credit rated. The information should, at a minimum, be the same as is provided in the annual report.
- (xvii) **Reports and the Company's announcements:** Reports and the Company's announcements, including (i) published interim reports for the current year, as well as for the three preceding years, (ii) annual reports for the last three years, and (iii) stock exchange announcement over the last three years (and/or link to the Company's announcements on www.newsweb.no) should be posted on the Company's website.
- (xviii) **Presentations:** Presentations given in connection with financial reporting, capital market days or similar, og other relevant presentations given by senior management representatives should be published. Presentations of financial reporting and other major presentations, such as capital market days, should be made available as webcasts or audiocasts.
- (xix) **Financial calendar:** The Company should publish a list of dates for financial reporting, general meetings, dividend payments, public presentations, and information on any (close period) in advance of financial reporting dates if the Company practices such an arrangement.
- (xx) **Contact details:** The Company should publish contact details for dedicates IR resources, including e-mail addresses.

6 COMMUNICATION USING OTHER CHANNELS

Social media



If the Company uses social media in its communication with the market, it should establish clear internal guidelines for how this shall take place to include the individuals who are chosen to speak in public on behalf of the Company.

These guidelines should also focus on the difference between private communication and company information. The tone and form of communication through social media often differ from other channels and is normally less

formal. The Company shall therefore ensure that the information given is not shared in such a way that it may be misleading to the market. **Notifiable information must always be published in accordance with applicable regulations prior to being published in social media or via other channels.**

Contact with analysts and equity research



The relations between the Company and individual analyst should be characterized by openness.

The Company should have internal guidelines on contacts with analysts and on managing research in order to ensure that important information is not shared in a discriminatory fashion.

Analysts shall not be provided with inside information, or any such information in advance of its publication to any party where the recipient undertakes not to use the information prior to its publication. The Company should exercise caution in terms of the information it communicates and should ensure that it does not communicate information that taken together could be of material importance and thus give the analyst an advantage.

Presentations for analysts shall be arranged as joint presentations for all analysts, and conferences for analysts should be open. Once information has been provided to any analyst, the Company should not refuse to provide others with the same information unless it has objective factual grounds for doing so. Information for analysts should be made available to all interested parties via the Company's website.

As a rule, the Company should not comment directly on estimates and research. To the extent that the Company thinks that the forecasts of analysts or the market as a whole are too high or too low and it wishes to draw attention to this, the Company must do this by issuing a stock exchange announcement. It is, however, acceptable for the Company to point out concrete factual errors in relation to matters that the company itself has previously disclosed where such have been used as the basis for research and estimates.

The Company should be cautious about actively distributing or publishing reports produced by analysts that it has been given permission to distribute externally as such distribution may be interpreted as the company endorsing the content of the report(s) in question.

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