



**INVESTOR RELATIONS POLICY**

NETCOMPANY GROUP A/S

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**INVESTOR RELATIONS POLICY**

NETCOMPANY GROUP A/S

(CVR-no. 39 48 89 14)

**1 INTRODUCTION**

1.1 This Investor Relations Policy (the "Policy") has been established by the Board of Directors of Netcompany Group A/S, CVR no. 39 48 89 14 (the "Company") and provides the general foundation for the Company's communication with the investors, equity analysts and other stakeholders in the financial markets.

**2 OBJECTIVES**

2.1 The Company will aim to comply with the following objectives:

- (i) The Company aspires to provide service that meets the highest standards in global investor relations and aims to be perceived as a trustworthy and open company by the investor community.
- (ii) The Company communicates all material information correctly, in a balanced, transparent and timely way and simultaneously to investors, equity analysts and other stakeholders in the financial markets to facilitate regular trading and fair pricing of the Company's shares.
- (iii) The investor relations function communicates information from and about capital markets to the Executive Management and Board of Directors to keep them well informed about capital markets' sentiment and feedback on the Company.

2.2 Information possibly affecting the market's valuation of the Company is made available simultaneously and with the same content to all market participants and in compliance with the Market Abuse Regulation, the Rules for issuers of shares of Nasdaq Copenhagen A/S, the Danish Corporate Governance Recommendations and other relevant statutory requirements.

**3 STRATEGY**

3.1 The Company works proactively to build knowledge of the Company among institutional and other professional investors as well as among Danish private investors by seeking to:

- (i) Facilitate that investors, equity analysts and other stakeholders in the financial markets have a good understanding of the Company's activities, business model, strategy and financial targets;
- (ii) be accessible and visible to current and potential investors;
- (iii) ensure that investors are provided with an opportunity to voice their opinions about the activities of the Company and its commercial and strategic development;
- (iv) maintain and enhance broad coverage by domestic and foreign equity analysts;
- (v) have a broad investor base;
- (vi) arrange and participate in frequent investor meetings, including roadshows, webcasts and teleconferences;
- (vii) arrange and participate in conferences and presentations for investors and analysts on relevant topics; and
- (viii) host capital market days on a regular basis, whereby investors and analysts will be given the opportunity to engage with a broad range of the Company's management.

**4 RESPONSIBILITIES**

4.1 The Board of Directors, the CEO and the CFO have the overall responsibility for investor relations activities and the Company's communication with the capital markets.

4.2 The Executive Management appoints a person responsible for the investor relations function and for the Company's daily compliance with this Investor Relations Policy.

4.3 The person responsible for the investor relations function shall prepare, update and keep a log of all meetings with current or potential investors and analysts, including information about the attendees at such meetings.

## **5 SPOKESPERSONS**

5.1 The Company will be represented externally by the Chairman, CEO or CFO.

5.2 If comments by the Board of Directors are required or appropriate, the Chairman represents the Board of Directors externally. The Chairman may, in consultation with the Disclosure Committee, delegate such authority to the CEO in regard to specific matters.

5.3 In all other matters, the CEO shall represent the Company in its external communication and the CFO shall represent the Company in its external communication in relation to financial performance. The CEO may delegate such authority to other members of the Executive Management and, in specific matters, to heads of functions, who by virtue of their positions are or will be involved in external communication.

5.4 No member of the Board of Directors is entitled to make statements on behalf of or in relation to the Company, or otherwise communicate with the public or press, without the permission of the Chairman.

5.5 The Company does not comment on share price movement – not in general nor specifically on the Company's share price – or fluctuations on trading volumes. The Company refrains from commenting on market rumors or speculative inquiries.

5.6 From time to time, other staff within the Company may be designated by an authorised spokesperson to respond to specific inquiries as necessary or appropriate. Investors should not rely on statements made by individuals other than authorised spokespersons or individuals designated by the authorised spokespersons.

## **6 COMPANY ANNOUNCEMENTS AND FINANCIAL REPORTS**

6.1 All company announcements and financial reports are published in accordance with Danish and European legislation and regulations for listed companies, in accordance with the Rules for issuers of shares of Nasdaq Copenhagen A/S and in accordance with the Company's Internal Rules for compliance with disclosure obligations.

6.2 Immediately after release, the company announcements and financial reports are made available on the Company's website. Financial reporting is published on a quarterly basis through annual reports and interim reports.

6.3 Company announcements will be made available in English. Investor calls following quarterly interim reports will be conducted in English and the presentation of material accompanying the quarterly interim report will be made in English.

6.4 Financial reports will be prepared and published in English. The Board of Directors may resolve to supplement the financial reports with a Danish translation or a summary in Danish.

## **7 CONFERENCE CALLS, PRESENTATIONS AND MEETINGS**

7.1 The Company communicates with investors, equity analysts and other stakeholders by hosting and participating in conference calls, investor presentations and other meetings, etc., as applicable.

7.2 Upon the release of annual reports, interim reports, financial statements and other material news, the Company hosts conference calls for investors, equity analysts and other stakeholders.

7.3 The Company conducts meetings with investors, equity analysts and other stakeholders in groups and individually. The Company may also, if deemed necessary, host capital market days and participate in meetings arranged for retail investors in Denmark.

7.4 All relevant presentations from such events, as well as recordings from conference calls, are made publicly available on the Company's website at the same time as the event or as soon as possible thereafter.

**8 QUIET PERIOD**

8.1 For a period of 4 weeks prior to the publication of the Company's financial reports, the Company will not comment on any matters related to the Company's financial condition, forecasts or market expectations.

**9 ANALYST REPORTS**

9.1 The Company maintains an active working relationship with domestic and foreign equity analysts to enhance the quantity and quality of analysts' research.

9.2 When asked to review draft analyst reports, the Company only comments on factual and publicly available information and not on specific analyst opinions or estimates.

**10 WEBSITE**

10.1 On the Company's website, [www.netcompany.com](http://www.netcompany.com), an investor relations section is made available to facilitate ongoing communication with investors. The investor relations section includes investor related information such as company announcements, the financial calendar, financial reports, information on general meetings, presentations and recordings, the shareholder portal and other share related information, etc. Further, disclosed financial data will be made available in electronic format for download – for all practical measures as means of .css files or excel.

**11 REVIEW AND AMENDMENT**

11.1 The Board of Directors shall annually review, and if relevant update, this Policy.

**12 PUBLICATION**

12.1 This Policy will be published on the Company's website.

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Approved and adopted by the Board of Directors of Netcompany Group A/S on 22 May 2018.