

14 January 2022

INVESTOR RELATIONS POLICY

SameSystem A/S, CVR no. 31 48 79 27

1. PURPOSE

- 1.1. This investor relations policy (the "Policy") for SameSystem A/S (the "Company") provides the framework and general principles for the Company's communication and dialogue with investors and other stakeholders on the capital markets.
- 1.2. The Policy is aimed at all stakeholders in the Company's financial ecosystem. By implementing the principles of the Policy the Company aims to ensure that its perceived as a visible, accessible, reliable and professional Company by investors, other stakeholders and the financial community.
- 1.3. The Policy applies to all employees and functions at the Company.

2. PRINCIPLES

- 2.1. The Policy shall ensure all material information potentially affecting the valuation of the Company, including financial and strategic performance, opportunities and risks, is communicated simultaneously in a correctly, balanced and transparent manner to all market participants and in compliance with applicable regulation, including Market Abuse Regulation, the Nordic Main Market Rulebook for Issuers of Shares on Nasdaq Copenhagen A/S, the Danish Capital Markets Act, as well as other relevant statutory requirements.
- 2.2. The Policy shall ensure that the Company is professional, responsive and proactive in its communication efforts to maintain a fair balance between expectations and performance, and it maintain an open and constructive dialogue with the capital markets based on easy access to the Company's executive management and a high level of transparency when communicating with shareholders and other stakeholders.
- 2.3. The Policy shall further ensure information from and about the capital markets is channeled back to the Company's executive board and board of directors to keep them well informed about the capital market sentiment and feedback from the stakeholders.
- 2.4. If deemed appropriate by the executive management of the Company, the Company will take part in the public debate regarding areas closely associated with the business of The Company.

3. INVESTOR RELATIONS CHANNELS

- 3.1. The Company's communication with stakeholders and the capital market is mainly conducted through company announcements, general meetings, investor meetings and the investor section on the Company's website.
- 3.2. Releases to the capital markets as well as the financial community and media is mainly based on scheduled releases of company announcements and financial reports. The Company may also release company

announcements regarding material information ad hoc in compliance with applicable regulation. Material information are categorized as share sensitive information, which shall be made public simultaneously prior to said information are disclosed to any other person or group.

- 3.3. Company announcements and financial reports are published in English and will be made available on the Company's website immediately after publication.
- 3.4. Investor dialogue is conducted through conference calls, meetings, investor presentations and capital markets days. Such presentations will be available on the Company's investor relations section on the website at the same time as the event or as soon as possible afterwards.
- 3.5. The Company maintain an investor relations section on its website with investor related information such as company announcements, the financial calendar, financial reports, information on general meetings, presentations and recordings, access to the investors' portal, and other related information.

4. FINANCIAL REPORTING

- 4.1. Financial reporting is published on a quarterly basis through annual and interim reports.
- 4.2. The Company provides financial guidance for the full year.

5. INVESTOR RELATIONS

- 5.1. As part of the investor relations activities, the Company conducts meetings with external investors and other stakeholders on a regular basis. The meeting activities comprise individual meetings, group presentations and presentations at conferences. The Company may also participate or host capital markets days as well as conduct road shows presentations of the Company's financial results.
- 5.2. At the Company's annual general meeting all shareholders are invited to attend the meeting and meet the board of directors and the executive management. Shareholders may propose items to be included on the agenda, ask questions before and at the meeting and vote on issues on the agenda.
- 5.3. The Company applies the following main principles with regards to its shareholders:
 - (a) The Company operates in accordance with good governance principles with honesty and prudence, and without conflict of interest, while always aiming at creating good returns for every shareholder in a sustainable manner.

- (b) The Company operates and conducts its business in accordance with the rules for companies listed on Nasdaq First North Premier Growth Market.
- (c) The Company operates and conducts its business in accordance with applicable laws and regulations, hereinunder applicable law regarding the rights of shareholders, and the Recommendations on Corporate Governance.
- (d) The Company applies an active and timely investor relations policy to ensure that all relevant information is communicated accurately and timely to the shareholders and the financial markets to facilitate regular trading and fair pricing of the listed SameSystem securities. The Company will not perform any act that may infringe or restrict the rights of shareholders.
- (e) The Company strives to ensure that the Company is recognized as a transparent, responsible and reliable company and that the operations of the Company are directly linked to the adopted overall business strategy. Accordingly, significant information, financial reports, and operating results is disclosed on an accurate, complete, timely, transparent, and reliable manner through easily accessible channels.

6. OTHER STAKEHOLDERS

- 6.1. In addition to its shareholders, the Company's customers are regarded as key stakeholders to the Company. The following main principles is applied to the Customers:
 - (a) The Company commits to excellent customer service and collaboration with its customers to understand the users, to challenge assumptions, and to redefine any problem in an attempt to identify alternative strategies and solutions that may not be instantly apparent to the Company.
 - (b) The Company generally strive to build mutually beneficial relationships with its customers and suppliers.
 - (c) The Company strive to provide its customers with complete and accurate information in a timely and easy accessible way.
 - (d) The Company strive to address inquires, feedback and complaints effectively and with short response time.

7. LIMITATION OF INFORMATION

- 7.1. In general the Company refrain from commenting on share price movement.
- 7.2. The Company does not comment on market rumors or speculative inquiries. However, in the event a market rumor is likely to have a significant influence on the capital markets, or in the event the stock exchanges on which the Company is listed approaches the Company for clarification, response will be made appropriately and responsibly.
- 7.3. When asked to review analyst models and reports, the Company limit its comments to correcting factual historical information and drawing attention to publicly available information.

8. SILENT PERIOD

- 8.1. The first day after the end of each quarter until the day of the release of the quarterly report are silent periods with no broad business discussions with investors or financial analysts.

9. RESPONSIBILITIES

- 9.1. The board of directors and the executive management of the Company have the overall responsibility for investor relations activities.
- 9.2. The executive management appoints a person responsible for the investor relations function and for the daily compliance with the Policy.

10. SPOKESPERSONS

- 10.1. The Company will primarily be represented externally by the CEO, CFO and/or the chairman of the board of directors.
- 10.2. When required the chairman represents the board of directors externally. The chairman may delegate such authority to the CEO regarding specific matters. No member of the board of directors will make statements on behalf of or in relation to the Company, or otherwise communicate with the public or press, without permission of the chairman.
- 10.3. The CEO represents the Company in its external communication, and the CFO shall represent the Company in its external communication in relation to financial performance. The CEO or CFO, as applicable, 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.
- 10.4. Other employees within the Company may be designated by an authorized spokesperson to respond to specific inquiries as necessary or appropriate.

- 10.5. Investors should not rely on statements made by individuals other than authorized spokespersons or individuals designated by the authorized spokespersons.

11. REVIEW AND AMMENDMENT

- 11.1. The board of directors shall annually review and update the Policy.

12. PUBLICATION

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

13. BOARD OF DIRECTORS APPROVEMENT

- 13.1. Approved and adopted by the board of directors of the Company on 14 January 2022.