Communication Policy

**Document ID:**

# Summary

The objective of this Communication Policy is to contribute to a correct and long-term effective exchange of information within Facility Pro and its employees and between the company and the company’s external stakeholders. Communication in accordance with the Communication Policy contributes to increased confidence in management, employees and owners and enhances knowledge of the company’s profile, goals and objectives. It further ensures consistent communication with the operating environment in accordance with the company’s strategies.

Information within Facility Pro is ultimately intended to support the company’s vision, mission and strategies. In addition it should strengthen Facility Pro reputation and brand and counteract the risk of a decline in trust.

Facility Pro Communication Policy has been established by the Board of Directors in accordance with applicable listing requirements with a view to meet legal requirements and to comply with applicable stock market regulations.

# Scope and Objective

This Policy is valid for all Facility Pro companies, its subsidiaries and joint operations (jointly “Facility Pro”) and applies to all employees, as well as consultants who work at Facility Pro premises or under the direction of Facility Pro

This Policy provides an overview of Facility Pro principles covering both external and internal communication to make sure it is performed in a coordinated, efficient and professional manner. In order to support the organisation internally and external communication.

All employees and members of the Board are expected to follow this Policy as well as applicable directives in all communication, internally and externally.

# Principles

The Communication Policy applies to all written statements in annual reports, interim reports, press releases, letters to shareholders or employees, statements from management, information on the Company’s digital communication platforms, information in public registers and other content in both internal and external communications.

The policy also covers all verbal statements at group or individual meetings with analysts and investors, telephone conversations with analysts and investors, speeches by company management, interviews with the media and at press conferences, and all other external or internal communications and statements that are to be executed.

In all situations where any form of communication is to take place, regardless of whether it is through written or oral communication and regardless of choice of medium and recipient, it must be considered how the communication affects the company as a whole. All persons must in each situation evaluate the impact and consequences of the communication. When handling inside information, each person has an independent responsibility to ensure that they comply with relevant rules and requirements.

The guiding principles for Facility Pro communications are to:

* Communicate in an open, reliable, well-structured and transparent way, both internally and externally;
* Treat all stakeholders equally;
* Disseminate all inside information timely and accurately;
* Fulfil legal requirements and comply with applicable regulations;
* Uphold a high level of ethics;
* Ensure the reliability of information by maintaining specific communication channels and procedures;
* Ensure a consistent and aligned communication to protect and promote our company image and business in a proper and consistent manner.

# Responsibility and spokespersons

## **External communication**

The Board of Directors is ultimately responsible for Facility Pro strategy and organisation and shall ultimately monitor the administration of and compliance with the Communication Policy.

The CEO’s spokesperson is responsible for issuing statements to Facility Pro external stakeholders on business relations. The Chairman of the Board may also issue statements on issues related to the company’s business.

The CEO is ultimately responsible for all matters of communication. The CEO has ultimate responsibility for contacts with the media and is the primary spokesperson for all issues concerning the company as a whole. The CEO may delegate the role of spokesperson as well as strategic and operational implementation of communication activities to other employees.

The CEO or delegated representative leads the communications and is responsible for planning and steering of all of Facility Pro communication.

Corporate Communications is responsible for planning, coordinating, steering and implementing communication in accordance with this Communication Policy.

The Chief Financial Officer (CFO) is responsible for all information about and related to the company’s financial position and results in press releases, financial reports and other information material. The CFO is responsible for preparation of financial information in interim reports, financial statements and annual reports. The CFO is responsible for remaining continuously up to date with the legal and stock market requirements applicable to the company’s communications. The CFO shall in cooperation with the President & CEO and the Executive Vice President Communication & Academy, ensure that Facility Pro performs its communications obligations in accordance with the applicable laws and regulations, including the listing requirements and generally accepted practice. In so far as the CFO deems necessary, the CFO shall seek legal advice to ensure such compliance.

None of the company’s employees are authorised to speak on behalf of Facility Pro regarding financial and share-price sensitive matters, unless he or she has been appointed to do so by the CEO or the CFO in relation to the financial position.

Other members of the Facility Pro Executive Team are responsible, in their respective areas, for adapting and following the principles of the Communication Policy, as well as for ensuring that the information used in the communication within their respective area is correct, relevant, clear and not misleading.

## **Local matters**

The spokesperson for local matters that are deemed to have the potential to become matters of interest shall make decision on such matters in consultation with the CEO, CFO and/or the Executive Team, as relevant.

Changes in local operations, such as divestments, a major order, a minor order that may lead to major commitments and the penetration of new markets are examples of matters of interest in which the CEO, CFO and/or the Executive Team shall be the spokesperson.

For local matters that are only deemed to be of local interest, the CEO’s delegate or appointed Executive Team spokesperson shall be the company’s spokesperson towards the local media.

## **Internal communication**

Internal information is an integrated part of all managers’ overall responsibility. The managers must adapt and communicate Facility Pro strategy and objectives. Furthermore, each manager is responsible for informing employees of matters that affect their work and organisational function.

All employees are responsible for actively obtaining information about the company and their function via the internal communication channels. Employees also have a responsibility to communicate with their managers and colleagues and thereby keep themselves informed.

# External communication

External communication relates to communication that is intended to reach one or more target groups outside Facility Pro, such as the media (which is both a channel and a target group), customers, existing and potential investors, the capital market, authorities and the general public. The mission of Facility Pro external communication is to support the business in reaching its overall objectives by developing and maintaining good relations with important stakeholders and by increasing knowledge and awareness of the company and its operations.

Only spokespersons appointed in section [4](#_bookmark0) have a mandate to make official statements on behalf of Facility Pro and/or its subsidiaries and joint operations within the individually defined areas set forth in the section.

# Internal communication

The mission of internal communication is to support Facility Pro in realising its objectives by providing employees with information about Facility Pro objectives, strategy, operations, results as well as how to realise these objectives. The internal communication is limited by the rules of disclosure of inside information, which means that information constituting inside information can be communicated freely internally.

Internal communication is directed primarily to Facility Pro employees. This audience can be divided into two subgroups:

* managers and/or other key employees;
* all employees

Considering the limitations stated by the rules, Facility Pro employees must secure a continually open and interactive flow of information at and between each organisational level, supported by adopted procedures and flexible and adequate channels.

# Breaches against the policy – Speak up

Do not hesitate to raise a concern. Any Facility Pro employee who suspects violations of this Policy is expected to speak up and raise the issue to their manager, Human Resources, to the Ethics and Compliance Office.

At Facility Pro, we do not accept any form of retaliation against someone who speaks up, expresses concerns or opinions.

# Roles and Responsibilities

All Facility Pro employees are individually responsible for reading, understanding and complying with this Policy. Each employee is responsible for acting in accordance with this Policy, every manager is responsible for making sure each team member has access to this Policy and related Directives.

# Framework

This Policy is part of Facility Pro Governance Framework, which includes:

* Code of Conduct, Our Cultural Values, Strategic framework, Policies approved by the CEO or Executive Team as well as local instructions
* Decisions made by the CEO or otherwise under the Delegations of Authority as approved by the CEO or Executive Team
* The Ethics and Compliance Office is responsible for ensuring that the latest version of this Policy is published and available to all employees on the Facility Pro intranet.
* This Policy will be reviewed every other year.
* The original language of this Policy is English.

# Contacts

Name:

Manager:

Email: Phone:

Name:

Business Group::

Email Phone

## Useful links: