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# Communications Policy

## Information

### What does this policy cover?

This Communications Policy (“**the Policy**”) covers the regulations and guidelines that apply to Hemnet Group AB (publ)’s (“**Hemnet**” or the “**Company**”) disclosures to the stock market, the media, and the general public as a listed company. It ensures that all communications are accurate, timely, and compliant with relevant laws and standards.

The Policy is complemented by Hemnet’s Insider Policy, which governs the handling of inside information by individuals with access to such information, including persons discharging managerial responsibilities, so-called PDMRs.

Together, these policies ensure that Hemnet maintains transparency and integrity in its communications, protecting both the Company’s reputation and its compliance with regulatory obligations.

### Who does this Policy apply to?

This Policy applies to and provides support for all information and communication efforts across all levels of the organisation, including the CEO, persons discharging managerial responsibilities, communication managers, and other employees of the Company. It is designed to ensure a consistent, transparent, and effective communication strategy both internally and externally.

### Why have we created this Policy?

The core objective of the Policy is to define the procedures and responsibilities for providing information to the stock market, the media and the general public. It ensures that communications are conducted by authorised spokespersons, at appropriate times, and in a manner that meets the highest standards of accuracy and transparency. The Policy supports Hemnet’s commitments to ethical communication practices and regulatory compliance, safeguarding the Company’s reputation and stakeholder trust.

## Applicable regulations

A company listed on Nasdaq Stockholm must comply with the marketplace’s requirements for providing information. The requirements are primarily regulated by Article 17 of the European Parliament and the Council’s Regulation (EU) No. 596/2014 on market abuse (“**MAR**”), including the

amendments following from the European Parliament and the Council's Regulation (EU) No. 2024/809 (the "**Listing Act**"), as well as the Nasdaq Nordic Main Market Rulebook for Issuers of Shares ("**Nasdaq's Rulebook**"). In addition to the rules for providing information to the market, MAR also includes rules for handling inside information and obligations for persons discharging managerial responsibilities and their closely associated persons. Nasdaq's Rulebook also includes more extensive rules for providing information and rules on how financial reports should be designed and disclosed. Furthermore, there are rules that complement MAR in the Act with Supplementary Provisions to the EU Market Abuse Regulation (*Sw. lagen (2016:1306) med kompletterande bestämmelser till EU:s marknadsmissbruksförordning*), as well as provisions on criminal proceedings and penalties in the Act on Penalties for Market Abuse on the Securities Market (*Sw. lagen (2016:1307) om straff för marknadsmissbruk på värdepappersmarknaden*).

## Handling of inside information

According to MAR, inside information is information of a precise nature that has not been made public, relating directly or indirectly, to one or more issuers or one or more financial instruments and which, if it were made public, would be likely to have a significant effect on the price of those financial instruments or on the price of related derivative financial instruments; i.e., information that a reasonable investor would probably use as part of the basis for an investment decision.

The Policy handles the communication of inside information, while Hemnet's *Insider Policy* covers the regulatory framework that applies to persons with access to inside information regarding the Company, as well as persons discharging managerial responsibilities in the Company.

Decisions on whether information is to be regarded as inside information, are made in accordance with the process set forth in the *Insider Policy*. The Chief Communications Officer (CCO) shall be informed immediately for the execution of communication activities.

### Disclosure requirement regarding inside information

The main rule is that the Company shall as **soon as possible** disclose inside information to the public. This does not, however, apply to inside information relating to intermediate steps in a protracted process, provided that the Company ensures that such inside information relating to an intermediate step is kept confidential.

If there are reasons for the Company not to disclose the inside information immediately, with the exception of inside information relating to such an intermediate step, the Company may instead under certain circumstances decide to delay the disclosure of the inside information, see further below, and at the same time decide on the establishment of an insider list, see the Company's *Insider Policy*.

### Delayed publication of inside information

In accordance with Article 17.4 of MAR, the Company may, at its own risk, delay the disclosure of inside information, provided that the following conditions are met:

- a) Immediate disclosure is likely to prejudice the legitimate interests of the Company.
- b) The inside information that the Company intends to delay is not in contrast with the latest public announcement or other type of communication from the Company on the same matter to which the inside information relates.

- c) The Company can ensure that the information remains confidential.

Inside information relating to an intermediate step in a protracted process does not need to be disclosed as soon as possible, where those steps are connected with bringing about or resulting in particular circumstances or a particular event. This means that intermediate steps in protracted processes are not subject to the above three conditions for delayed disclosure pursuant to Article 17.4a of MAR. The Company therefore does not need to make a decision to delay the disclosure of inside information relating to such intermediate steps. Typical such protracted processes include, for example, quarterly reports, acquisitions or divestitures, other material agreements or transactions, capital raisings, mergers, strategic changes, and certain regulatory or permit processes. In such cases, as a general rule, only the final circumstances or the final event shall be disclosed as soon as possible after they have occurred. A decision to delay the disclosure of the final step may only be made provided that the above three conditions are met.

Decisions on the delay of the disclosure of inside information are made by the Chief Executive Officer (CEO) in consultation with the General Counsel and, if possible and appropriate, also with the Chief Financial Officer (CFO). Each of the CEO, the General Counsel and the CFO shall be independently mandated to decide on the delay of disclosure, if consultation is not possible or appropriate. In the event that the CEO is not involved in the decision, the CEO shall also be informed, at the latest before the inside information is disclosed. The CFO shall be informed immediately if a decision has been made to delay disclosure for the purposes of planning of communication activities. If the disclosure of inside information is delayed according to the above, the Company shall, in conjunction with the decision to delay, document the decision, including information about the person(s) who made the decision and how the above three conditions have been met. The decision coincides with the opening of an insider list. With respect to inside information relating to intermediate steps in a protracted process, such information does not need to be documented for the assessment of whether the above three conditions are met. When the final step is disclosed, no notification to the Swedish Financial Supervisory Authority (the "SFSA") (Sw. *Finansinspektionen*) needs to be made, provided that the final step has not been subject to a delayed disclosure. The Company is obliged to keep information about protracted processes confidential and to open an insider list when the inside information arises.

If confidentiality can no longer be ensured with respect to inside information whose disclosure has been delayed or with respect to inside information relating to an intermediate step in a protracted process, the Company shall disclose that information as soon as possible.

If the Company has delayed the disclosure of inside information and subsequently discloses the inside information, the Company shall immediately inform the SFSA thereof. Upon request from the SFSA, the Company shall also provide a written explanation of how the conditions for the delayed disclosure were met at the time of the decision and how it has been ensured that they have been continuously met during the period up until the disclosure, which is why the above-mentioned documentation shall be prepared. The SFSA shall be informed at the same time as a press release to the market containing the information that has been the subject of delayed disclosure is published.

### **Press releases and publication of inside information**

According to what has been stated above, inside information shall be published as soon as possible after the decision or event that gives rise to the publication. A disclosure of inside information shall not take more time than what is required to compile and distribute the information. A publication cannot be postponed until the next trading day and must in cases where the obligation to disclose information arises during the evening or weekend be published at that time.

CCO is responsible for preparing a draft press release prior to a decision with proper planning. Before any distribution, the press release must always be approved by the CEO and the CFO if possible. The CEO and the CFO shall always be informed before the press release is published. Press releases containing inside information are commented on by the CEO and in certain issues, by the Chair of the Board.

It is prohibited to provide inside information, for example, at a general meeting or at a meeting with analysts, unless the information is disclosed simultaneously. If Hemnet intends to provide such information during a general meeting or other meeting, a press release with the inside information shall be published simultaneously.

## **Distribution of inside information**

Hemnet shall ensure that the inside information is published in a manner that enables the public fast access to the information and that provides for a complete and correct assessment of the information in a timely manner. The CCO is responsible for ensuring that inside information is disclosed by way of a press release without delay and in a non-discriminatory manner to the public. The CFO is responsible for ensuring that interim reports and annual reports containing inside information are disclosed without delay and in a non-discriminatory manner to the public. Hemnet shall not combine the disclosure of inside information to the public with marketing.

For distribution of press releases with inside information, an established information distributor is used to ensure that Nasdaq Stockholm, the SFSA, established news agencies, newspapers and the public within the entire union can simultaneously access published information without delay. Hemnet's regulatory press releases shall be distributed in Swedish and English and shall also be made available in connection with distribution on the Company's website, [www.hemnetgroup.se](http://www.hemnetgroup.se), where it is clearly indicated through classification of press releases which press releases are of a regulatory or commercial nature respectively.

## **Press release content and labelling**

Information published by Hemnet must be accurate, relevant and clear, and it must not be misleading. Information regarding decisions, facts and circumstances must be sufficiently detailed to enable an assessment of the significance of the information to Hemnet and its financial instruments.

In a press release disclosing inside information, the most important information shall be clearly presented at the beginning of the press release. Each press release shall have a heading that summarises the content. The information shall be sufficiently detailed to enable an assessment of the significance of the current event to Hemnet and its financial instruments. Omitted information may also result in Hemnet's disclosures being incorrect or misleading.

All of Hemnet's press releases containing inside information shall be provided with a MAR label. The press release shall furthermore contain the following:

- That the information being disclosed is inside information.
- The Company's name.
- The identity of the person communicating the message as well as contact information.
- Date and time of the disclosure.

Other regulatory press releases are published in accordance with Nasdaq's Rulebook or applicable legislation. For relevant legal references in press releases, etc., see the document "*Press release template*" which includes examples of labelling of press releases regarding inside information and financial reports.

### **Other communications pertaining to inside information**

The CCO is responsible, when necessary, for drawing up documentation that summarises questions that may arise as a result of the published communication, as well as the Company's official responses and messages regarding the news being communicated. Communication to inform Hemnet's staff shall also be prepared when necessary. With respect to insider and regulatory information, the internal information shall without any exceptions never precede information to the stock market and its stakeholders, see below under the heading "*Internal communication*". All communication regarding inside information shall be approved by the CEO and the CFO.

### **Handling and archiving of documents with inside information**

Preparation of press releases and other communications concerning inside information shall be done with great care and in such a way that no one other than those who have been entered in the insider list has the possibility to access the information in advance. Any printouts containing inside information shall be stored in a locked place or destroyed in a secure manner.

All documentation containing inside information shall be handled with great care. Such documentation shall only be accessible to persons who have been entered in the insider list. If there is a need to share the documents with persons who have not been entered in the insider list, the person concerned shall be entered in the list in connection with being given access to the inside information in accordance with the routines set out in Hemnet's *Insider Policy*.

### **Advance information to Nasdaq Stockholm**

If the Company intends to disclose inside information that is assumed to be of extraordinary importance, Nasdaq Stockholm shall be contacted before disclosure takes place. This is to ensure as fair a distribution of the information as possible. If an event occurs outside the Company's control, the Company shall inform the exchange about the event as soon as possible.

### **Profit warnings**

In the event that Hemnet's financial results or financial position deviates materially from what can reasonably be expected based on previously published information by the Company, information on such a deviation may constitute inside information. A profit warning is typically triggered when the Company has made a sufficiently clear assessment of such a deviation, whereupon the information shall be disclosed as soon as possible. The exception for intermediate steps in protracted processes does not alter this starting point, since profit warnings relate to a one-off event that is regarded as standalone inside information. If there is uncertainty as to whether the results or the financial position deviates materially from what can reasonably be expected, the Company shall immediately consult Nasdaq's market surveillance and/or the Company's advisers.

# Disclosure of regulatory information

In accordance with Nasdaq's Rulebook, the Company is also obliged to, among other things, disclose information in the specific situations set out below, regardless of whether these events constitute inside information or not.

- General meetings.
  - Notice to general meetings and bulletin from the general meetings.
- Board of Directors, executive management team and auditor.
  - All changes in the composition of the Board, material changes in the executive management team, and the resignation, dismissal or change of auditor.
- Incentive programs.
  - Decision of the Company to introduce share-related incentive programs. The disclosure shall include information about the most important conditions and terms of the program.
- Buying or selling of own shares.
- Admission to trading and delisting.
  - The first time the Company applies for admission to trading on a marketplace other than Nasdaq Stockholm, as well as any decision to apply for delisting of the Company's financial instruments from Nasdaq Stockholm or another marketplace. The Company shall also disclose the outcome of such an application.
- Year-end report and interim reports.
- When a new agreement on liquidity enhancement measures has been entered into or such an agreement has been terminated.
- Resolutions that have been made to change the Company's share capital or the number of shares in the Company.
  - The information shall include all material information about the changes.
  - The Company shall also disclose the outcome of the change in share capital or the number of shares.

The CCO is responsible for preparing press releases for the above situations in consultation with the CEO and the CFO. As in the case for press releases that contain inside information, other regulatory press releases shall also always be approved by the CEO and the CFO before distribution.

The CCO is also responsible for preparing, when necessary, supplementary external documentation (such as Q&A) as well as internal information in accordance with what is described under the heading "*Press releases and publication of inside information*" above.

## Authorised spokespersons

The following positions, without exception, speak on behalf of Hemnet and handle the communication with the stock market's stakeholders and the media regarding financial and regulatory information:

- **The Chair of the Board** is the spokesperson primarily in ownership and board matters as well as issues of great strategic importance to the Company. This applies, for example, to issues regarding the Board's work, general meetings, incentive programs and management remuneration.
- **The CEO** is the spokesperson in important issues regarding the Company's strategy, focus and operational activities and the only one, in addition to the Chair of the Board, who speaks on behalf of the Company regarding inside information in press releases and in the media. To handle follow-up questions regarding already disclosed inside information or financial reports from the media, the CEO can delegate the responsibility to the CFO, CCO or Head of PR. Regarding follow-up questions on inside information from the capital market, the CEO can delegate the responsibility to the CFO or the Head of IR.
- **The CFO** is ultimately responsible for communication with the capital market but can delegate the responsibility to the Head of IR. The CFO can also answer questions from the media regarding areas concerning the Company's disclosed financial results and questions concerning the Company's relationship to the capital market. The CFO is also responsible for providing the CEO and the Board of Directors with correct and relevant information about the Company's financial position and results.
- **The CCO** is ultimately responsible for communication from the Company to the media and employees and for relevant information being distributed to relevant stakeholders (for example, the media, opinion leaders and the Company's employees). The CCO is also responsible for ensuring that clear messages and Q&A are in place regarding issues that may come from the media in general, but regarding communicated inside information in particular. The CCO has the mandate to speak on behalf of the Company in matters regarding operational activities as well as follow-up questions regarding disclosed inside information, according to agreed messages, on behalf of the CEO. The CCO can delegate the spokesperson role to the Head of PR.
- **The Head of PR** is responsible for the Company's relations with the press and media. The Head of PR has the mandate to speak on behalf of the Company regarding news from the Company, products, certain organisational changes or other operational events (see below under the heading "*Spokespersons for commercial information*"). Regarding issues concerning communicated inside information, the Head of PR always speaks in consultation with the CEO, CFO or CCO according to agreed messages. The Head of PR is also operationally responsible for distributing relevant information to the media and other stakeholders through the Company's system for distribution of press releases.
- **The Head of IR** is responsible for the Company's relations with and communication to the capital market and also has the mandate to speak on behalf of the Company to this target group.
- **The General Counsel** is ultimately responsible for communication with authorities in legal matters.

The CEO, CFO and CCO should strive to always be available, especially in connection with financial reporting, when press releases have been published or when a news item that concerns the Company is current.

Other employees and senior executives within the Company who are contacted by investors, shareholders, analysts or the media shall, without exception, refer directly to the Head of PR or CCO who then passes the question on to the relevant spokesperson depending on the nature of the question.

### **Spokespersons for commercial information (not insider or regulatory information)**

In commercial communications for marketing purposes that are not of a regulatory or insider nature, spokespersons other than those above may be given the mandate to speak on behalf of the Company depending on the topic and area. Anyone who is to make a statement to the media shall always coordinate this through the Head of PR or the CCO. The Head of PR can also act as a spokesperson on these issues. When it comes to questions about the Company's overall strategy, results or other issues that are critical to the business, the Head of PR never speaks until the messages are agreed with the CCO and approved by the CEO.

In the case of more extensive questions about the Company's overall strategy and results, solely the CEO or the Chair of the Board may make a statement.

Individual employees may never act as spokespersons for the Company without this having been agreed in advance with the Head of PR or the CCO.

## **The Company's contacts with stock market representatives**

Hemnet has, in order to give a true and fair view of the Company, an immediate, transparent and continuous contact with the stock market. This means that, with the exception of quiet periods, representatives of Hemnet can have ongoing conversations and meetings with analysts, institutional investors or other professional players in the market.

All contacts with the stock market are handled or coordinated by the CFO and/or Head of IR. Only the CEO, the CFO and/or the Head of IR are allowed to independently take meetings and hold conversations with stock market representatives. If necessary, other experts from the Company can also contribute to provide a more detailed picture of, for example, the development of a business area or a product. However, representatives from the Company other than the CEO, the CFO or the Head of IR may never, on their own initiative or independently, hold conversations with stock market representatives. It is the responsibility of the relevant spokesperson (CEO, CFO or Head of IR) to ensure that the information provided is factual, consistent and compliant with the Policy.

It may be permissible in analyst contacts to provide non-disclosed information if such information is not to be regarded as inside information. However, it is important to note that if sensitive information is disclosed, and the disclosure may harm the Company, for example for competition reasons, the informant may be liable for damages against the Company, which is why such information may not be provided without permission from the CEO, CFO or CCO. It is however always allowed to:

- Remind about previously released information.
- Correct misunderstandings, counting errors and obvious factual errors.
- Provide industry statistics.

Should inside information be accidentally disclosed in a dialogue with stock market representatives, for example in response to a question, a press release should immediately follow in accordance with the procedures for press releases on inside information detailed in this policy.

Regarding the Company's analyst and media contacts, the following applies:

- If an analyst has received certain information, the Company cannot deny another analyst or journalist the same information. This should be included in the Company's assessment of whether the information can be disclosed.
- The Company should be prepared to provide the same information for analysts to the media.
- It is forbidden to provide analysts or journalists with information about upcoming news, regardless of whether they promise not to publish it prior to release. This does not apply to purely commercial news or PR activities that do not contain insider or regulatory information.
- The Company should always invite the media to analyst meetings to reduce the risk of such meetings being perceived as suspicious.
- Analysts should be treated fairly and have access to the same information whether they represent a small or large owner or analyst firm.
- Hemnet should only comment on analyst reports to the extent that they contain factual errors.

## **Crisis management and managing information leaks**

For incidents that could potentially develop into a crisis, or where an information leak would have a negative impact on the Company or its financial instruments, the CCO is responsible for preparing material in advance in the form of draft press releases, internal communications, and Q&A to address questions from the public, the media and customers.

### **Managing information leaks**

By following the routines in the Policy, the Company works proactively to prevent information leaks. It is of great importance that the Company's employees are aware of their obligation not to share sensitive information and that they follow the Company's established routines and processes for dissemination of information. The Communications Department is responsible for ensuring that all new employees within the Company receive a review of the main elements of the Policy during their on-boarding and that all of the Company's employees are informed of the contents of the Policy at least once a year or when necessary. Persons in senior positions shall furthermore ensure that employees who have access to inside information understand the significance of this responsibility and the importance of not disseminating such information. When handling information relating to regulatory information and inside information, the Company shall ensure that no more persons than necessary are informed.

If inside information despite measures taken leaks from the Company, the Company shall immediately disclose the inside information in accordance with the routines in the Policy. The Company shall also immediately contact Nasdaq Stockholm so that trading can be stopped if

necessary before it has been affected by the information leak. In the event of an information leak, the Company shall always report the actual circumstances.

For questions from the media, the general public and customers regarding rumours and speculation concerning the Company, the Company shall always apply the following position: "The Company has a policy not to comment on rumours and speculation". In the event that the rumour is harmful to the Company, a corrective statement should be published through a press release.

Prior to important decisions, the CCO is responsible for preparing the basis for a press release and having it approved promptly in accordance with the procedures described above for "*Press releases and publication of inside information*".

## **Internal communication**

Communication is one of the most important management tools for the Company to achieve its operational objectives. Well-functioning internal communication creates participation and ensures that all employees work towards common goals. Within Hemnet, high standards are set for internal information to be transparent, accurate, complete, easily accessible and provided without unnecessary delay. All employees shall continuously receive information about important events in the Company as well as specific information relating to their respective department or area of operations.

The goal is for all employees to know and understand the Company's goals and strategic plans. Employees should be aware that the outside world's and the stock market's perception of the Company affects the Company's position and success. Each manager is responsible for ensuring that the flow of information functions within their area of responsibility and that internal information (regardless of whether such information is confidential or not) is not publicly disclosed or disseminated in any other way than as set forth in the Policy. In order to ensure that the Company has control over internal information, employees shall not undertake consultancy engagements or other external engagements where they may be asked to share knowledge or information about any aspect of Hemnet, Hemnet's business or the property market.

All internal information shall take into account applicable regulations, which may lead to limitations in how broadly information is disseminated internally. Certain information cannot be communicated to all employees due to regulatory requirements and competition reasons. Inside information shall in accordance with MAR be properly disclosed before the information may be distributed internally. It is therefore of the utmost importance that all employees handle all company information with great care. If an employee cannot establish with certainty that certain information does not constitute inside information or that the information has already been disclosed, the employee may not disseminate such information either within or outside the Company.

It is the responsibility of the CCO to ensure that the Company's employees know, understand and comply with this Policy in relevant parts.

## **Publication of financial reports**

Hemnet publishes interim reports and the year-end report within two months of the end of the respective reporting period. On [www.hemnetgroup.se](http://www.hemnetgroup.se), a financial calendar is available with information on the dates when the Company is expected to publish, among other things, interim reports and the year-end report.

## **The general meeting**

The general meeting is Hemnet's highest decision-making body, where the shareholders jointly decide on important issues regarding the Company. The date of the Annual General Meeting shall be stated in a timely manner, which means at the latest in connection with the publication of the year-end report.

The CFO is responsible for preparing and distributing the notice of the Annual General Meeting and extraordinary general meetings, as well as for other planning and implementation of the meetings. The CFO or the Head of IR is also responsible for updating the Company's website with relevant information regarding general meetings and related documents.

## **Financial calendar and quiet periods**

According to Nasdaq's Rulebook, the Company is obliged to publish on its website for each calendar year a financial calendar (also referred to as a corporate calendar) with expected dates for the publication of the year-end report and other financial reports and, if applicable, payment of dividends. If changes are made to a pre-announced date, the Company shall publish an updated calendar as soon as possible. If such a change is made later than two weeks before a pre-announced date or later than two weeks before the new date, the Company shall disclose the new date in a press release, including the reason for the changed date if possible.

Hemnet observes a quiet period starting 30 calendar days before the publication of each quarterly report. During the quiet period, the Company's representatives shall refrain from answering questions about or commenting on the Company's financial development, position or other potentially price-sensitive information in contacts with analysts, investors and the media. Contacts with the media that do not concern financial or price-sensitive information are, however, permitted during the quiet period.

## **The Company's website for financial information**

On the Company's website, [www.hemnetgroup.se](http://www.hemnetgroup.se), all published information about the Company since the date of the Company's listing on Nasdaq Stockholm should be available. The information must be kept available for at least five (5) years. However, financial reports must be available on the website for at least ten (10) years following publication. The information that the Company has disclosed in accordance with Nasdaq's Rulebook shall be made available on the website as soon as possible after publication. Press releases containing regulatory and/or inside information shall be separable from news that does not contain regulatory and/or inside information.

The website must also contain, among other things, the following information:

- Annual reports, prospectuses and other information published or made available to shareholders.
- Information about the Board of Directors.
- Information about the Executive Management.

- Information on corporate governance in accordance with the Swedish Code of Corporate Governance (Sw. *Svensk kod för bolagsstyrning*).
- Current Articles of Association.
- Financial calendar.

The CCO is ultimately responsible for the Company's website for financial information and for keeping the website updated with relevant and accurate information. In addition to the CCO, the General Counsel, the Head of IR and the Head of PR have the mandate to update the website with relevant information within their respective areas of responsibility.

## **Guidelines on participation in stock chats and social media**

So-called stock chats are discussion forums for those interested in the stock market. It is not consistent with the Policy that the Company's employees participate in such chats regarding Hemnet, even if it concerns information that has already been disclosed. The prohibition applies regardless of whether participation is under a pseudonym or from a private device.

The Company's employees are its best ambassadors and the Company is positive towards employees who wish to spread information and knowledge about Hemnet in a responsible manner in their own channels. However, the Company's employees may not spread or comment on information about the Company via social media beyond what is specified in the guidelines below. It is important that employees distinguish between participation in social media within the framework of their employment and participation in a private context. Employees should be aware that participation and comments in social media may be perceived as statements from Hemnet, especially if it concerns industry-specific issues or the employee expresses themselves based on their profession.

Guidelines for employees' participation in social media:

- All communication and participation in social media shall be consistent with the Policy and the Company's *Insider Policy*.
- Employees shall exercise caution with professional advice via social media and refer to the correct instance or channel to avoid incorrect information or misinterpretations.
- It is of course permitted to share posts from Hemnet's channels and participate in discussions that fall within the scope of the individual employee's area of expertise. As an employee at Hemnet, it is important to be clear about one's role and to be a good representative of the business (for example on LinkedIn).
- Employees are encouraged to notify the Company's Communications Department of negative or inappropriate messages about the business that the Company should respond to.
- Material that can be perceived as offensive or threatening should never be published.
- Confidential or sensitive content regarding company secrets, customers or colleagues shall never be published.
- Employees shall never comment on anyone or anything in a derogatory tone.

- Employees shall mention competitors, customers, partners, suppliers and other stakeholders with caution. Employees are always representatives of the Company and shall without exception treat the Company's stakeholders with business acumen, professionalism and respect.

## **Governance**

### **Roles and responsibilities**

The CCO is the owner of the Policy and is responsible for leading and coordinating the Communications Department. Any updates or amendments to the Policy require approval from the Board of Directors before they enter into force.

## **Follow-up and compliance**

### **Monitoring and review**

This Policy shall undergo an annual review in accordance with Guidelines for Hemnet's Governing Documents and Policy for Corporate Governance, in order to ensure that it is correctly formulated and remains fit for purpose for the Company's operations. The review is conducted by CCO and aims to assess whether the Policy needs to be updated as a result of changes in applicable regulations, the Company's operations or working methods, or whether there is otherwise a need for clarification to ensure that the Policy provides appropriate and clear support for regulatory compliance and good corporate governance. The review is conducted as part of the Company's overall work on risk management and corporate governance.

### **This Policy's accessibility**

This Policy is accessible to all employees and relevant stakeholders through the Company's internal communication platforms and Hemnet's website at [www.hemnetgroup.se](http://www.hemnetgroup.se).

Training and educational materials are provided in connection with training on the Company's *Code of Conduct*, to ensure understanding of and compliance with the Policy.

### **Reporting channels for compliance issues**

Hemnet's Code of Conduct indicates which reporting channels are to be used by employees who detect deficiencies in compliance with the Company's governing documents. Each employee is encouraged, where possible, to first raise the matter with the person concerned. If this is not suitable or possible, the responsible manager shall be contacted. If this is also not suitable or possible, the employee is encouraged to contact their manager's manager, Hemnet's Chief People & Culture Officer or Hemnet's General Counsel. In addition, serious misconduct may be reported anonymously through the Company's whistleblower function, which is available at [www.report.whistleb.com/en/hemnet](http://www.report.whistleb.com/en/hemnet).

## **Violations of this Policy**

Violations of this Policy will always be taken very seriously and may result in disciplinary measures, including dismissal. In addition, violations of applicable legislation may result in the individual employee and/or the Company being subject to legal sanctions.

## **Entry into force**

The Policy has been adopted by the Company's Board of Directors and enters into force on 5 June 2026. Upon entry into force, the Policy supersedes the previous version of the Policy.

## **Related documents**

The Company's CCO is responsible for compiling, making available and maintaining documents containing the following documentation for the publication of inside information:

- Examples of labelling of press releases regarding inside information and financial reports.