

# Investor Relations policy

## Introduction

This IR policy for ChemoMetec A/S has been prepared by the Board of Directors on the basis of the Market Abuse Regulation (no. 596/2014), the Danish Capital Markets Act, the Nordic Main Market Rulebook for Issuers of Shares, Danish Executive Order no. 1173 of 31 October 2017 on disclosure requirements for issuers, and with due consideration for the principle of equal treatment of investors.

## Purpose

The purpose of the IR policy is to maintain a high level of information, ensuring that ChemoMetec provides timely, reliable, accurate and updated information to the market.

Furthermore, ChemoMetec strives to have open and trustworthy communications with shareholders, investors, analysts, media and other stakeholders, the purpose being to provide insights into the company's activities, results, outlook and strategy as well as into developments in the markets in which ChemoMetec is present.

This is intended to provide the equity market and other stakeholders with the best possible foundation for pricing the company's shares.

## Responsibility

The ultimate responsibility for the company's investor relations – and thus for communications with shareholders, investors, analysts, media and other stakeholders – lies with the company's Board of Directors and Management Team.

The day-to-day IR responsibility has been delegated to the company's CFO.

The responsibility for updating the permanent insider list and the event-based insider lists is, as stated by the company's internal rules to ensure compliance with the rules on trading in shares and disclosure of inside information, delegated to the company's CFO.

## Principles

In consideration of applicable rules, ChemoMetec is committed to providing shareholders and other stakeholders with relevant information and easy access to information.

Communications with shareholders and other stakeholders take place based on the disclosure requirements applicable to ChemoMetec by virtue of its listing on Nasdaq Copenhagen, including the general provision of article 17 of the Market Abuse Regulation, under which an issuer must inform the public as soon as possible of the relevant information in a manner which enables fast access to and complete and timely assessment of the information by the public.

The company holds regular meetings with investors and analysts, including both large investor and analyst meetings and meetings with individual shareholders and analysts.

All meetings and other communications take place in accordance with the rules of the Capital Markets Act, the disclosure requirements of Nasdaq Copenhagen A/S and other relevant applicable rules.

## Public disclosure of financial statements and other information

As a listed company, ChemoMetec publishes its annual, half-yearly and interim reports as well as other company announcements as provided by law.

Prior to the beginning of each financial year, ChemoMetec discloses a financial calendar stating the expected dates of publication of the annual report, half-yearly reports and interim reports as well as the date/week of the company's annual general meeting and, where relevant, of the distribution of dividend.

All information disclosed with a view to complying with the disclosure requirements of Nasdaq Copenhagen A/S will be available at ChemoMetec's website ([www.chemometec.com](http://www.chemometec.com)) immediately after disclosure.

## Basic communication with shareholders etc.

All communications on investor relations issues are handled by the Chairman of the Board of Directors, the Executive Management, or the IR responsible.

Communications with shareholders, investors, analysts, media and other investor relations stakeholders are coordinated by the IR responsible.

The IR responsible is thus the primary point of contact in connection with inquiries from the said stakeholders, and the IR responsible – in consultation with the Chairman of the Board of Directors and the Executive Management – is in charge of proactive communications with stakeholders.

The contact details of the IR responsible are available at the company's website.

## Company announcements

Communications with shareholders and other stakeholders generally take place through company announcements.

Company announcements are published at the website of Nasdaq Copenhagen, [www.nasdaqomxnordic.com](http://www.nasdaqomxnordic.com), and at ChemoMetec's investor site, [chemometec.com/investor-relations](http://chemometec.com/investor-relations).

The scope of the company announcement must always be such as to give shareholders a complete and accurate view.

Inside information must be disclosed as soon as possible in accordance with article 17 of the Market Abuse Regulation, clause 3 of the Nordic Main Market Rulebook for Issuers of Shares and the company's internal disclosure rules in force.

The assessment as to whether a matter, not being considered at a board meeting, should be disclosed is made by the company's Executive Management in consultation with the IR responsible, who will consult the Chairman of the Board of Directors to the extent necessary. As regards subjects considered by the Board of Directors, the Chairman must make an assessment as to whether, in the course of the Board's consideration, inside information has emerged, including whether disclosure of such

information should be delayed in accordance with article 17(4) of the Market Abuse Regulation and the procedures set out in the company's disclosure rules in force.

In case of doubt, Nasdaq Copenhagen's Surveillance department is contacted. The same applies in cases where publication of a company announcement would be expected to have a significant effect on the share price. In such cases Nasdaq Copenhagen's Surveillance department must be notified in advance.

The Executive Management is responsible for ensuring that information of relevance to the stock market is disclosed correctly and in a timely manner in accordance with applicable law. Where possible within the framework of the law, the Board of Directors must be presented with a draft of the company announcement prior to disclosure to the public.

The IR responsible notifies the Board of Directors whenever a company announcement is released.

### **Direct inquiries to Nasdaq Copenhagen**

In some situations, a direct inquiry to Nasdaq Copenhagen prior to publication of a company announcement may be necessary.

This is specifically the case where:

- there are reasonable grounds to assume that the company will make a public offer to buy financial instruments in another company admitted to trading;
- there are reasonable grounds to assume that a third party will make a public takeover bid to the shareholders of the company, and this has not been disclosed by way of a company announcement; or
- a company announcement is expected to have a very noticeable effect on the pricing of the company's shares.

Notification will generally take place by way of a telephone call to Nasdaq Copenhagen's Surveillance department.

This is the responsibility of the company's IR responsible.

### **Annual report, half-yearly report and interim reports**

The company prepares annual reports, half-yearly reports and interim reports.

These reports are published in accordance with ChemoMetec's financial calendar following approval at the board meeting at which the company's Board of Directors approves the relevant report and company announcement.

In connection with such publication, the Chairman of the Board of Directors, the Executive Management and the company's IR responsible have a special responsibility for making themselves available to the public. This is coordinated among the said group of persons prior to publication.

### **General meetings**

Under article 7 of the Articles of Association, the company's annual general meeting is held once a year, at a Greater Copenhagen venue chosen by the Board of Directors, in due time for the audited and approved annual report to be submitted to the Danish Business Authority and received by the ChemoMetec A/S (CVR no. 19 82 81 31)

Authority before the deadline set out in the Danish Financial Statements Act.

The first step in convening the general meeting is the release of a company announcement containing the notice convening the meeting, following which a letter or an e-mail is sent to all registered shareholders who have so requested. At the same time, the notice convening the general meeting is published at the company's website.

Following the general meeting, a company announcement setting out the resolutions made at the general meeting is released. This company announcement is approved by the Board of Directors at a board meeting held shortly after the general meeting.

As soon as possible after the general meeting, the results of the general meeting are made public. In addition, the following may be disclosed at the company's investor site, [chemometec.com/investor-relations](https://chemometec.com/investor-relations):

- Minutes of the general meeting
- Presentation from the general meeting
- The Chairman's report
- The Executive Management's review of the annual report

### **Other communication with shareholders etc.**

ChemoMetec aims to engage in open dialogue with shareholders and other stakeholders.

To that end, ChemoMetec endeavours to maintain a high level of information and to provide timely and accurate answers to all inquiries (it being noted that the level of information during the silent period up to the release of the financial statements is maintained at a requisite low level).

### **Updates**

This policy is updated as and when required and at least once annually. The policy will be updated especially in connection with new disclosure rules entering into force.

Updates are the responsibility of the Board of Directors.

*Approved by the Board of Directors on 15 June 2023*