



# Group Policy

## Finance

### INVESTOR RELATIONS

Document owner: CFO  
Approver: CEO

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# Investor relations

## 1 The purpose of this policy is

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To set out Grieg Seafood's principles for our communication with shareholders and the financial community.

## 2 Policy statement

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Grieg Seafood engages with the investor community with an open, transparent and continuous dialogue. Building trust and awareness is critical to ensure that the information disclosed to the financial market, including current and potential investors, analysts and other stakeholders, provides the best possible basis for a correct valuation of Grieg Seafood.

## 3 Our principles

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### Compliance with laws and regulations

- Grieg Seafood's Investor Relations (IR) activities comply with applicable laws and regulations, including the Norwegian Securities Trading Act, the Norwegian Accounting Act and Oslo Børs Continuing Obligations of stock exchange listed companies.
- Grieg Seafood complies with the Oslo Børs Code of Practice for IR of 1 March 2021, with the exception of item 2.1, which recommends that half-yearly and interim reports are published by the 15<sup>th</sup> day of the second month after the end of the accounting period. Interim reports are published as soon as possible, however, holidays or specific events may impact the release dates.
- Grieg Seafood also complies with relevant recommendations and market practices for reporting of financial and other relevant information.
- Communication with investors are based on the principles of equal treatment and transparency.

### Market disclosures

- Grieg Seafood provides the financial community with timely and simultaneous access to accurate, clear, relevant, complete and balanced information about performance and outlook.
- Grieg Seafood does not comment directly on estimates and research published by analysts. Specific factual errors can be commented on.
- Grieg Seafood's financial reporting is based on an integrated reporting principle, which includes the environmental, social, and governmental (ESG) aspects to explain the financial results.

### Language

- All financial and other IR information are published in English.

### Market communication

- Grieg Seafood regularly holds presentations and participates in meetings, both on demand and by own initiative, to raise awareness of, and create interest in Grieg Seafood:
  - Interim reporting: Grieg Seafood hosts open presentations in relations with releasing the interim financial results. The interim reports are published within two months after the end of the specific accounting period.
  - Annual reporting: The annual reports are published within four months after the end of the financial year.

- Capital Markets Day/Update: Grieg Seafood hosts open Capital Markets Days when appropriate, to keep the market up to date on strategic development.
- Investor and analyst meetings: Grieg Seafood holds regular meetings with current investors, potential investors and analysts. Any discussions at such meetings will be based on publicly available information.
- Roadshows: Grieg Seafood periodically arranges roadshows to major financial markets to meet shareholders and investors.
- Seminars, conferences and other events: Management representatives regularly participates in various events.
- Other channels: Relevant information is provided through press releases, notice to the stock exchange and through Grieg Seafood’s web site.
- Reporting dates and financial events are stated in the financial [calendar](#).

#### Trading update

- Grieg Seafood announces guiding on harvested volume and farming cost prior to releasing interim results.
- Deviations between guided vs actual volume and cost must be assessed related to duty of disclosure on a case-by-case basis. Changes in relation to guiding information that are price sensitive will be publicly disclosed without delay.

#### Inside information

- Grieg Seafood promptly discloses all inside information (as defined by the Norwegian Securities Trading Act).
- Inside information is handled in compliance to Grieg Seafood’s Policy on Inside Information.

#### Communication during the silent period

- Meetings with members of the investor community are not held in the last three weeks prior to releasing interim results. Grieg Seafood do not attend investor meetings or events, or comment to the media or other external parties regarding earnings and outlook during these periods. Fact-based questions may be answered.

## **4 Definitions**

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Investor community – includes current investors, potential investors, analysts, asset managers, financial institutions and other financial stakeholders.

Silent period – three weeks prior to releasing the quarterly financial reports.

## **5 Tracking and reporting**

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The following are published on Grieg Seafood’s [Investor website](#):

- Interim and annual financial reports and presentations
- Presentations from Capital Market events
- Other relevant presentations

The presentations from quarterly reports and Capital Markets events are available as webcast shortly after the live presentations.

Grieg Seafood engages with various ESG rating organizations, to ensure their indexes or score reflect the actual EGS risks. These ESG scores are normally available on the internet.

## 6 Responsibility for implementing and adhering to this policy

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### ***Board of Directors***

- Monitoring compliance with the policy

### ***CEO & CFO***

- CFO reviews and updates the policy, CEO approves
- CFO communicates policy organizationally
- CEO and CFO comprise the Grieg Seafood's Investor Relations team (IR team)
- Responsible for all day-to-day contact with Grieg Seafood's shareholders and the financial market (investors, analysts and financial media)
- Facilitate that shareholders get the opportunity to provide direct feedback and discuss special topics
- Engage in a continuous dialogue with the investor community to ensure an understanding of issues of particular importance to the stakeholders. Such dialogue should also contribute to the management and the Board of Directors of Grieg Seafood obtaining relevant information about the market's views and opinions on Grieg Seafood
- May delegate authorization as spokespersons for IR related matters
- Ensure consistent and simultaneous information to all shareholders through suitable channels

### ***Global Management Team***

- Following the policy
- Participating in the dialogue with the investor community when appropriate

### ***Regional Directors, Managers & Supervisors***

- Communicating policy to all staff
- Adhering to policy
- Addressing issues

### ***All staff***

- Adhering to policy

## 7 Related documents or references

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This policy is implemented in conjunction with:

- The Norwegian Code of Practice for Corporate Governance
- Grieg Seafood's Code of Conduct
- Grieg Seafood's Policy for Related Parties transactions
- Grieg Seafood's Policy for Majority Shareholder interaction