



ITIVITI

Information Policy

Itiviti Group AB



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Introduction

This Information Policy is intended to provide guidance on how the information work shall be conducted within Itiviti Group AB and subsidiaries (“**Itiviti**”).

One of the most important assets for the company and management is the market’s confidence in the company (see the Audiences section below). It takes long-term efforts of investing time and money to maintain good communication. It is therefore very important to create good routines for how the information process shall be carried out and this document constitutes the foundation of Itiviti’s information policy.

The information objective for Itiviti should be for the public to have a clear picture of the company and the company’s development. This requires the company to strive for open communication.

In order to ensure correct and consistent information there are certain things that you as an Itiviti employee should be aware of as well as certain rules to comply with. If you should have any questions regarding this Information Policy and how to comply with it, it is your responsibility to contact the nearest superior manager or the Chief Marketing Officer to clarify any unclear points. The Chief Marketing Officer is responsible for this information being continuously updated and that all employees are informed.

Overall objectives

The overall objectives with Itiviti’s Information Policy are:

- To help, develop and strengthen the communication and dialogue with Itiviti’s employees, customers, clients, partners and other stakeholders.
- To give correct information and spread the knowledge and understanding about the company and its offering as well as its financial performance to the extent such information is required to be made public.
- To protect the organization’s sensitive business information and information of any client, customer or partner within its custody or safekeeping by safeguarding its confidentiality, integrity and availability.

Furthermore, in combination with Itiviti’s Information Security Guidelines as well as the company’s Crises Management Plan the objectives are also:

- To establish safeguards to protect the organization’s information resources from theft, abuse, misuse and any form of damage.
- To establish responsibility and accountability for information security in the organization.
- To encourage management and staff to maintain an appropriate level of awareness, knowledge and skill to allow them to minimize the occurrence and severity of information security incidents.
- To ensure that the organization is able to continue its commercial activities in the event of significant information security incidents.

Approach

The approach that should characterize the information activities within Itiviti can be summarized in the following concepts:



- **Transparency** - The information should be characterized by transparency and accessibility.
- **Objectivity** - The information given should always be factual, accurate and well- reasoned.
- **Consideration** - Information aspects should be considered before any major decision. The goal is for Itiviti to provide first-hand information about its own operations, thus avoiding misunderstanding and error.
- **Customization** - The information provided should always be designed for the intended recipient in an understandable way. Meaning correct information to the right person at the right time.
- **Consistency** - All written information should be structured in a consistent way to clarify that the information comes from Itiviti.

Organization and Responsibility

As a Nordic Capital portfolio company relevant information needs to be coordinated with Nordic Capital and Nordic Capital's Communications Manager should be kept up to date on larger communications initiatives.

Within Itiviti there are two main spokespersons, the CEO and the CFO. Additionally, the Chairman may speak on behalf of the company. If you receive questions from the media about our company or requests from other parties for a statement on Itiviti's behalf, you should refer them to the CEO or the CFO. The company also has other spokespersons related to specific business units and knowledge areas. For example, the Presidents of each region may answer questions about regional matters and specialists within for example product management may speak about topics related to their profession and role within the company. For more information, contact the Chief Marketing Officer.

As an Itiviti employee, you should be prepared for unexpected phone calls from journalists. For example, how would you react when a journalist calls and says *"I have heard that you are buying the X Company, how do you feel about this?"* Even if you do know that we are buying a company you are not allowed to comment on this question. Your answer should be *"You should talk to our spokes persons the CEO or CFO regarding matters like this."*

The rule is never ever comment upon rumors - refer to the spokespersons instead.

Generally, you can always refer to our website for more information, www.Itiviti-group.com. See also "Information Management during crises."

Note that you are free to supply information that is public and non-sensitive about what our company does and how our products work, to clients, customers, partners and other stakeholders. You are not allowed to supply sensitive and other non-public information about the company and our products.

Only Itiviti's spokespersons are allowed to speak to media. See also "Who informs".

Internal Information and Communication

Objectives

Well-informed employees are a prerequisite for good communication with customers, clients, partners and other stakeholders. Well-functioning internal information will ensure that employees:

- Know and understand the goals, vision and results of the company.
- Have access to the information required to complete and fulfill their work.



- Have knowledge of how to actively seek information and be motivated to do so.
- Obtain information on matters relating to the business before they can read, see or hear about them in the media.

Audiences

The target audiences for the internal information and communication are the employees within Itiviti.

Internal information channels

Examples of internal information channels are:

- Electronic Information such as e-mail, Itiviti Internal, web site, systems for managing documents and other business systems.
- Verbal information, workplace meetings, recorded meetings etc.

Avoid leakages and restrict information internally

A crisis may arise or become worse via information leaks from the company. In order to avoid leaks, the time between decisions or actions and the publishing of the information should be as short as possible. For sensitive information, no individuals other than those who have the need to know should be informed.

All employees should have knowledge on how price-sensitive information is handled within the company. The Chief Marketing Officer shall ensure that new employees receive this information.

Never discuss non-public Itiviti sensitive information with an external person nearby. This applies outside as well as inside the office. A person visiting Itiviti should not happen to receive confidential information by overhearing a conversation or reading corporate documents. You shall also take all necessary precautions when discussing sensitive information on the cell phone. Proper precautionary methods may include using unrevealing language in general and nicknames when referring to Itiviti and third parties.

If a leak of information comes to your attention, you should immediately report it to the Chief Marketing Officer who will take further actions. See also "Information Management during crises."

Visitors should be supervised

Visitors should be supervised so that they do not get hold of non-public sensitive information. Documents with sensitive information must not be left open and accessible, for example in a printer or on a desk in the open office area, but must be kept in a secure manner.

External Information and Communication

Objectives

A functioning external communication is a prerequisite for Itiviti to be a company that customers, clients, investors, partners and other stakeholders have trust in and feel committed to.

The objectives are:

- To meet the requirements, and comply with the laws and rules, off the capital market.
- To inform customers, clients, investors, partners and other stakeholders about the development of the company and its offering in a timely and well-structured way.



- To facilitate the recruitment of new employees.

Audiences

Primary target groups are:

- The Exchange
- Swedish Financial Supervisory Authority
- Customers
- Potential customers
- Clients
- Investors
- Banks
- Partners
- Media
- Job seekers

Other target groups are:

- Nordic Capital
- CorpNordic

External Information Channels

The external information is expressed in many different contexts, including:

- Web: itiviti.com
- Interim- and annual reports
- Investor meetings
- E-newsletters
- Printed information
- Electronic presentations / PowerPoint presentations
- Responses to requests by mail, telephone, email and fax
- Media contacts and press releases (media is a channel and a target)
- Verbal information such as meetings and networking
- Exhibitions, conferences and other public events
- Reception / switchboard
- Advertising (print and on-line)
- Employees

Restrict Information Externally

Only share such information externally that is public and non-sensitive. Examples of sensitive information that should not be shared are financial forecasts, discussions with potential partners, suppliers and customers, project plans, source code as well as information about potential litigation or acquisitions. In case of uncertainty, contact nearest superior officer or the Chief Marketing Officer.



When to Inform

Publication shall take place immediately, i.e. in direct conjunction with the adoption of a resolution, an election having taken place, or an event becoming known to the company, unless exceptional circumstances prevail. The principle of immediacy means that the publication may not be postponed beyond the time required to compile and disseminate the information. This means that a press release should be drafted before important decisions are made. If a decision, that needs to be communicated, is made during a Board meeting it is to be publicized immediately after the meeting.

If price sensitive information is provided intentionally to a third party, who does not owe a duty of confidentiality, disclosure shall be made simultaneously. The disclosure of information may however be delayed in accordance with applicable legislation. Significant changes to previously disclosed information shall be disclosed as soon as possible. Correction of errors in information disclosed by the company itself need to be disclosed as soon as possible after the error has been noticed, unless the error is insignificant.

Consequently, price sensitive information may not be disclosed to analysts, journalists, or any other parties, either individually or in groups, unless such information is simultaneously made public to the market.

Price Sensitive Information

The company shall, as soon as possible, disclose information about decisions or other facts and circumstances that are “price sensitive”. For the purpose of these rules, “price sensitive” information means information which is reasonably expected to affect the price of the company’s listed securities, in accordance with applicable national legislation. It does not necessarily need to be an event that occurs but may be continuous changes or a series of events.

The Securities Market Act stipulates that a company must publish all information about its business and bonds that is of importance for estimating the value of the company’s financial instruments. (2007:528, chapter 15, 6§).

Price-sensitive information that has not been published concerning results, negotiations regarding acquisitions, partner contracts or other important contracts should only be given to those within the company who need the information in their work.

Examples of information that may be price-sensitive are:

- Changes in debt financing, rating, planned investments
- Financial reporting
- Acquisitions or sales
- New large client
- Larger order
- Larger investment
- Investment in new product area
- Partner contract or other important contracts
- Substantial bad debt or client losses
- Changes in management or other key positions
- Change of the Board’s compilation



It is permitted to provide non-publicized information. It is for example permitted to give additional information to previously publicized information, remind of earlier information, adjust misunderstandings, miscalculations and obvious incorrect statements as well as supply industry statistics.

In case of any uncertainty as to what is price sensitive information or not, the CEO and CFO have the final call.

Logbook

The company is obliged to keep a logbook when offers are made or to be made by the company itself, as well as other substantial business deals or, in some cases, other price sensitive information. The logbook shall contain names of those who receive information about the business deal, what information they have received, how and when. A logbook should also be kept in connection to Interim reports.

Information Leaks

If Itiviti learns that price sensitive information has leaked prior to a disclosure Itiviti shall make an announcement regarding the matter. If price sensitive information is given unintentionally to a third party, who does not owe a duty of confidentiality, disclosure shall be made promptly. See also Information Management during crises.

The company's CEO is responsible for initiating the logbook and the company's General Counsel is responsible for keeping the logbook.

Read the Information that Goes Public

In order to know what information is public and non-sensitive, read the information that Itiviti sends to the market. All Itiviti employees will receive an e-mail at the same time this information is made public. In case of uncertainty, contact nearest superior officer or the Chief Marketing Officer.

Itiviti Contacts

The company will be happy to send information about our company to those interested. Take name, address and what kind of information it concerns and forward this to the Chief Marketing Officer. Note that you are free to supply information that is public and non-sensitive about what our company does and how our products work to partners, customers and other stakeholders with the exception of media, these request should be referred to Itiviti's spokespersons.

Who Informs

Spokespersons and Area of Responsibility

As a Nordic Capital portfolio company relevant information needs to be coordinated with Nordic Capital and Nordic Capitals Communications Manager should be kept up to date on major communications initiatives.

Itiviti has the following spokespersons:

- CEO – responsible for strategic group-related matters.
- CFO – responsible for financial matters.
- CMO – responsible for daily media contacts.
- Chairman of the Board - The Chairman may also speak on behalf of the company, for example concerning the CEO's position, matters outside the ongoing administration and management and specific business critical issues.



In many cases it is advisable that a key officer or employee is available for comments as well, for example if the news concerns his or her business area.

As a Nordic Capital portfolio company owner related issues should be communicated by Nordic Capital and company operational issues by Itiviti. Some information might also be communicated jointly.

Security

Security aspects are extremely central in a listed company's information management. In order to prevent leakages of sensitive information, Itiviti should among other things have the following in place and apply the following routines:

- Routines for which employees have access to information on the server and how this information is updated. Employees should only access the level they need for their work tasks.
- Routines for visitors.
- Back-up.
- Alarm system for the office at night and locked doors during the day. Employees should have a personal code/key or similar tool that gives statistics to who has been in the office and when.
- Not allow important information to be kept unsupervised on the desk or other places such as the printers, where others may easily see the documents.
- Very sensitive information should be locked up.
- Shred sensitive information when disposing of it.
- Avoid sending very sensitive information via email.

Unauthorized Disclosure of Insider Information

Unauthorized disclosure of information which is likely to materially influence the price of financial instruments is prohibited.

Marketing Practice

Itiviti's marketing practice is important because it has an impact on the brand and our business. The elements, visual and textual, shaping our identity are all created in order to build the position of Itiviti and, help Itiviti differentiate from competition. Itiviti's marketing is primarily directed toward our customers and partners within the financial and trading industry. Itiviti shall not conduct or participate in any marketing activity that is unlawful, libelous, defamatory, slanderous, or offensive. Furthermore, Itiviti does not promote or favor any political parties, associations or religion or religious philosophy. Itiviti adhere to applicable marketing laws.

Additional Guidelines and Policies to Be Aware of

The below guidelines and policies can be found on Itiviti's intranet, Itiviti Internal.

IT Support For Managing the Internal and External Information

The IT support for managing the internal and external information and communication is clarified in the Crises Management Plan.



Information Security Policy

The purpose of the Information Security Policy is to define the principles to which all staff at all business units and companies within the Itiviti Group must adhere when handling information and IT equipment owned Itiviti group in any form.

Internal Communication Strategy

Itiviti's Internal Communication Strategy is intended to provide guidance on how the internal information work shall be conducted within Itiviti Group AB.

Itiviti's internal communication should be seen as a building block of the organizational culture. The organizational culture is the atmosphere of Itiviti's organization built on our values, mission and work processes. The purpose of Itiviti's Internal Communication Strategy is for every member of our organization to have the same values, understand the work policies and procedures, work towards the same goals, and by the same rules. Itiviti's internal communication is the bridge that connects Itiviti's management, its policies and philosophy to the employees and vice versa.

Social Media Guidelines

These guidelines apply to Itiviti employees worldwide who create or contribute to blogs, wikis, social networks, virtual worlds, or any other kind of social media in relation to Itiviti and our offering. Whether you log into LinkedIn, Twitter, Facebook pages or other social media, or comment on online media stories - these guidelines are for you.

The same principles and guidelines that apply to the activities of employees in general apply to employee activities in social media channels and any other form of online publishing. Your behavior online should therefore be consistent with Itiviti's Information Policy as well as the Groups Code of Conduct.

Graphical Guidelines

The Itiviti visual identity is the foundation upon which the Itiviti brands are built, and are the icons by which we are recognized and remembered. It is most powerful when applied congruently and when integrated throughout all levels of communication for the organization. It is therefore critical that the visual identity is always presented correctly - whether used in printed material or on screen.

These manuals were created to help you use Itiviti visual identity in the correct way. It gives you guidelines on how to use the logos and names as well as the solution names and taglines. It also covers the use of colors, language and trademarks.

If you need further clarification or assistance with any matter relating to the identity please contact the Marketing Group.

Applicability

This policy applies to all employees of Itiviti Group AB and its subsidiaries. In cases where national regulations cause difficulties regarding the implementation of or differs from the content of this policy, national regulations shall rule in those areas. Other parts of this policy shall still be valid.

Owner

Chief Marketing Officer