

Information policy

This Information Policy was adopted by the Board of Directors of Heimstaden AB (publ) in October 2017 and is posted on the company's intranet.

1. INTRODUCTION

Heimstaden AB (publ), ("Heimstaden" or the "Company"), is a public company listed on Nasdaq First North Premier ("First North") and thus follows the prevailing information rules in First North Nordic - Rulebook (including the rules that apply to companies on First North Premier and which can be found in Appendixes Land J) and Nasdaq Stockholm's Rules for Issuers, as regards interest-bearing instruments (together with First North Nordic Rulebook, "the Rules").

The Company shall comply with the Rules, the agreement concerning the listing established between the Company and First North and the Company's Certified Adviser, as well as other applicable laws and regulations that apply to public limited liability companies in Sweden listed on First North, for example the Regulation of the European Parliament and of the Council (596/2014/EU) on market abuse ("MAR"), the Act (2016:1306) with supplementary provisions to the EU Market Abuse Regulation and the Act (2016:1307) on penalties for market abuse in the securities market.

Good relationships are developed through good communication and by creating a constructive dialogue between individuals internally as well as externally. For Heimstaden, communication is an important tool that makes it possible to achieve set goals, implement decisions and engage and involve its own staff.

Communication must be an integrated and natural part of our business. The purpose of this information policy is to ensure the high quality of both internal and external information as well as compliance with laws, rules and agreements.

The information policy applies to the parent company Heimstaden AB, Heimstaden Forvaltning AB and all of the parent company's subsidiaries and associated companies.

2. FUNDAMENTAL PRINCIPLES

All communications shall be

- **Proactive**
To ensure that information about Heimstaden is true and up to date, our communication must be as proactive as possible and distributed simultaneously to all target groups.
- **Correct**
In order to ensure that Heimstaden is credible, all communication must be accurate, credible and adapted to the target group.
- **Open**
Our communications should be open and accessible for all stakeholders.
- **Holistic**
All communications must have a holistic view of collaboration between all departments to ensure that all business interests are met.

All information deemed to affect the value of the company's share shall be published without delay via a press release and distributed to First North and an established information distributor. The information must be published on the company's website and intranet at the same time.

Inside information shall be published as soon as possible. Publication should be made in direct connection with the decision or event that gave rise to the disclosure and should be made in such a way that the information is made available to the public in the EEA quickly and in a non-discriminatory manner.

Inside information refers to information of a specific nature that has not been made public, which is directly or indirectly related to the company or a financial instrument issued by or linked to the company and which, if it became public, would likely have significant impact on the price of the instrument or the price of related derivative instruments. Publication is by press release sent simultaneously to First North and Cision (which means that press releases are distributed to established news agencies and newspapers). The information is published on the Company's website at the same time.

Refer to the Company's inside information policy for the management of inside information.

3. COMMUNICATION ACTIVITIES

3.1. The purpose of the Company's communication activities

Through its communication activities, the Company aims to:

- Provide continuous and balanced information about important events and the Company's financial position
- Create interest in the business and build trust in it and in the company
- Create conditions for an increased dialogue with the outside world
- Involve and engage its own staff

The company's information/communication work is divided into the following business areas:

- External information
- Mass media relations
- Internal information

3.2 Communication channels

The company's tools for external and internal communications as well as mass media relations can include:

- Press releases
- Annual reports
- Interim reports and year-end reports
- Printed and digital information material
- Exhibitions and events
- Heimstaden's website www.heimstaden.com
- Responses to enquiries by phone, email and fax
- Analyst contacts and personal contacts
- Heimstaden's intranet
- Social media
- The "MinaSidor" (My Pages) customer portal

4. TARGET GROUPS

The Company's communication should be the same for everyone, but directed at various target groups. The target groups should be provided with valuable, easily accessible, and comprehensible information. The goal is to create value when the market has confidence in the Company. The following target groups have been identified for the Company's dissemination of information:

- The capital market
- Supervisory authorities
- Existing and potential shareholders
- Existing and potential commercial partners
- Media and other public opinion influencers
- Existing and potential customers
- Current and future employees

5. HEIMSTADEN'S PROFILE

Heimstaden's graphic manual is our handbook for branding activities. The branding consists of various graphic elements that together create a uniform image of Heimstaden. These graphic elements are the logo, colours, designs, typography, concept words and images.

6. RESPONSIBILITY AND ORGANIZATION

The Managing Director is ultimately responsible for compliance with the Company's information policy and for Heimstaden's communication with the market, society and media and that this complies with the regulations and MAR. The Managing Director ultimately decides what is inside information and if there are grounds to defer the disclosure of such information.

The Company's Financial Officer is also appointed as IR Manager and assists the Board of Directors and management regarding reporting, trading agreements and stock exchange rules.

6.1 Interviews and spokespersons

The Managing Director, Deputy Managing Director and Chairman of the Board or an individual appointed by them can act as spokesperson on general issues about Heimstaden. In each country/town, the Managing Director of subsidiaries and the Property and Town Manager may comment on operational activities for their businesses in the local press.

Only the Managing Director, the Deputy Managing Director, the Chairman of the Board and/or the IR Manager may act in connection with the publication of price-sensitive information. Transaction Managers can act as spokespersons after approval by the Managing Director, the Deputy Managing Director or the Chairman of the Board.

Other employees and executives at Heimstaden who are contacted by investors, shareholders, analysts or the media should be referred directly to the Managing Director, the Deputy Managing Director without further comment.

6.2 Communications Department and Investor Relations

The Communications Department and Investor Relations have the following shared responsibilities

- Responsibility for the overall coordination of the Company's media relations and graphic profile and ensuring that these are consistent.
- Providing the Company's stakeholders and target groups with financial or other relevant information.
- Writing and distributing press releases and being responsible for the compilation of annual reports and interim reports.
- Planning general meetings.
- Monitoring financial publicity and providing feedback to management and the Board to support critical business and communications activities.
- Updating and developing the Company's website regarding financial information.

7. SILENT PERIOD

A silent period of 30 days is maintained prior to the publication of interim reports, year-end reports or annual reports. During the silent period, no personal meetings with investors or analysts will be planned and no comments can be made regarding the Company's financial development. If the Company otherwise makes decisions or events occur that, to a not insignificant extent, are liable to affect the image of the Company's situation with regard to previously published information or otherwise affect the valuation of the Company's listed securities, the Company must immediately disclose the details.

8. INSIDE INFORMATION

8.1 General

All disclosure shall comply with the information rules laid down in the Rules. A basic prerequisite for independent analysis of the Company's business and value is that all stakeholders are given the opportunity to access the information from the Company simultaneously and in a non-discriminatory manner.

The assessment of what constitutes price-sensitive information may be undertaken on a case-by-case basis and in case of doubt, the Managing Director must contact the Company's Chief Legal Officer. If doubt persists, the CEO or Chief Legal Officer can contact the Company's Certified Adviser or First North for advice. During trading, this means that disclosure should not take more time than is required to compile and distribute the information. This must be done with urgency and disclosure must take place as soon as possible. This requires good planning, i.e. that a draft press release precedes a decision (however, this provision does not mean that the information must be submitted during an ongoing Board meeting).

If elections or decisions are made during the evening or at night and there is no trading in the Company's shares on any other marketplace, disclosure shall take place the following morning in good time before the marketplace opens. This assumes that those who know the information observe full confidentiality in the meantime.

Should an event occur outside the Company's control, the Company shall inform about the event as soon as possible. In order to satisfy such fair distribution of the information as possible when materially price-sensitive information is to be communicated to the market during trading, First North must be contacted in advance by the CEO or IR manager.

At the same time as the Company discloses price-sensitive information through a press release, the information shall be provided to First North, the Company's Certified Advisor and included on the Company's website.

The Company may only defer the publication of price-sensitive information in accordance with the Rules and following a decision by the Managing Director. In the event of such delay, First North and the Certified Advisor must be notified immediately.

The following are examples of what can typically be considered as price-sensitive information:

- acquisition or disposal of companies or businesses
- major orders or investment decisions
- unexpected changes in earnings
- a decision to carry out a share issue
- cooperation agreements or other agreements of major importance
- major market price or exchange rate changes
- major credit or customer losses
- disputes
- decisions by the authorities or a court
- related party transactions (special regulations)
- acquisition and transfer of securities
- information prior to the election of the Board
- repurchase of own shares
- forecast adjustments
- changes to operations

The Company is obliged to inform First North and the Company's Certified Adviser prior to disclosure if it can be expected that such disclosure will have a very significant impact on the price of the Company's securities.

8.2 Deferred publication of Inside information

In principle, the Company is obliged to disclose inside information as soon as possible. However, under certain conditions, the Company may defer such disclosure. The Company may defer the immediate disclosure of inside information only if:

- immediate disclosure would likely harm the Company's legitimate interests
- deferment does not mislead the public, and
- The Company can ensure that the information remains confidential.

The following situations are examples of when the Company is likely to have a legitimate interest in deferring disclosure:

- The Company is conducting negotiations where the negotiations or the outcome of the negotiations are likely to deteriorate if the information on the ongoing negotiations is disclosed.
- The Company is in a serious acute financial crisis and immediate disclosure would affect existing and future stakeholders in a significantly negative manner and complicate the completion of negotiations that are taking place in order to save the Company.
- The Company plans to buy or sell a substantial business where the outcome of the negotiations would be made more difficult if the information on the ongoing negotiations was disclosed.

The following situations are examples of when deferred disclosure would probably mislead the public:

- The inside information to be deferred differs significantly from previously disclosed information on the same issue.
- The inside information to be deferred refers to information that previously published financial targets will probably not be reached.
- The inside information to be deferred deviates from the market's expectations where such expectations are based on signals previously given by the Company.

The assessment of whether the conditions exist for deferring the disclosure of inside information must be based on facts and circumstances and be undertaken on a case-by-case basis. In case of doubt, contact the stock exchange or the Certified Advisor for advice. Both the stock exchange's staff and the Certified Advisor are bound by professional secrecy. Before such contact is made, however, the Company's legal advisers must be consulted.

The Company's decision to defer disclosure shall be recorded in electronic form and in accordance with the template found in Appendix 8.2 (a). At the request of Finansinspektionen (the Swedish financial supervisory authority), the Company shall provide Finansinspektionen with a written explanation of how the conditions for deferred disclosure were fulfilled.

Immediately after the Company discloses delayed inside information to the public, the Company shall inform Finansinspektionen in writing. Notification that the disclosure of inside information has been deferred shall be submitted to Finansinspektionen by email (mar@fi.se). The email must be sent to Finansinspektionen in accordance with the template found in Appendix 8.2 (b) or the corresponding IT system.

The company shall immediately inform First North and its Certified Adviser if the Company decides on deferred disclosure of inside information.

8.3 Management of inside information

Employees within the Company and, where applicable, the Company's subsidiary, shall comply with the internal confidentiality requirements, including the Company's insider policy and associated insider list, which have been established to prevent the dissemination of inside information.

Confidentiality agreements must be established for external consultants and partners who have access to inside information. See further information in the Company's insider policy.

8.4 Management of leaks of information

Investor Relations regularly monitors discussion forums and news sites to follow and identify statements about Heimstaden.

Information leaks are generally the result of carelessness and lack of discipline. Senior executives must

- At least once a year, make it clear to all employees who have access to undisclosed, price-sensitive information how important it is to not disseminate this information.
- Do not inform more people than necessary.

If price-sensitive information has leaked, Group Management shall make an assessment of the measures to be implemented.

If the Company becomes aware that inside information has leaked to the market, the following measures must be taken:

1. Notify the Managing Director.
2. The Managing Director, or person appointed by the Managing Director, contacts trade monitoring at First North (tel. +46 8 405 62 90).
3. The Managing Director informs the Board.
4. First North may decide to suspend trading in the Company's share.
5. Following a decision by the Managing Director or chairman of the Board, the Company must, in consultation with First North, publish clarifying information to the market if necessary.
6. An evaluation and changes to procedures should be carried out if necessary.

8.5 Rumours

Rumours regarding the Company's business can arise from time to time. In the event of a rumour, the Company shall consistently and always apply:

"Our policy is not to comment on rumours or speculation."

The term "no comment" must never be used as it can be interpreted as a confirmation.

If the rumour is harmful to the Company, the Company, if applicable after consulting with First North and the Certified Advisor, should publish a clarification through a press release. The basis for a press release must be prepared prior to important decisions.

However, when the disclosure of inside information has been delayed in accordance with MAR and it can no longer be ensured that the inside information remains confidential, the Company shall publish the insider information as soon as possible. This also includes situations where a rumour explicitly relates to inside information whose disclosure has been delayed when that rumour is sufficiently clear to demonstrate that it can no longer be ensured that the information remains Confidential.

8.6 Significant change in earnings or financial position

If Heimstaden's financial result or position deviates significantly from what can reasonably be expected as a result of the information that the Company has published earlier, the information regarding such deviation may constitute inside information.

When assessing whether a change in the Company's financial result or position is significant enough to constitute inside information, Heimstaden shall assess the deviation based on the latest known financial development, forecasts or forward-looking statements. Such an assessment basis should take

into account the Company's specific activities together with publicly known changes in financial assumptions during the remaining part of the financial period. Seasonal variations and general market developments can be included in such assumptions, for example. Consideration should also be given to other information provided by the Company regarding external factors, such as sensitivity analyses concerning, for example, interest rates, currency values and commodity prices. A summary of analysts' expectations for the Company is not decisive in determining how the assessment should be made.

9. FINANCIAL STATEMENTS

9.1 Financial statements

The Company shall publish financial statements in accordance with the information rules laid down in the Rules. The financial statements are produced by authorized personnel in the management team and the finance department. It is the responsibility of each person not to disclose information about the contents of the statements to others.

Each year the Company's Board of Directors decides upon the publication date for the financial statements, normally for the coming twelve-month period. The year-end report and the interim report shall be published no later than two months from the end of the reporting period. The content of each statement is approved by the Board after the closing of the stock exchange on the day before publication.

Mailings are sent via Cision, which also ensures that the statement is sent to the stock exchange, at 8.00 am on the reporting day. Only the Managing Director, the Deputy Managing Director, IR Manager and Communications Manager have the authority to upload financial statements to Cision. The press release must also be sent to the Company's Certified Adviser at the latest when the mailing takes place. At the same time as the mailing via Cision, the financial statement shall also be published on the Company's website by an authorized person.

For the year-end report, the content must be so comprehensive that the final annual report does not contain any inside information.

9.2 Specific details about the annual report

The annual report is distributed to the market via Cision in the same way as other financial statements. The Board of Directors approves the annual report before publication. At the same time as the mailing via Cision, the annual report shall also be published on the Company's website and no later than at the same time as the mailing the annual report must be sent to the Company's Certified Adviser.

The IR manager is responsible for this. The Company aims to publish no later than 4 weeks before the AGM.

10. PROCEDURES FOR INFORMATION DISCLOSURE

10.1 Distribution of inside information

The Managing Director is responsible for ensuring that price-sensitive information in the form of press releases, interim reports and annual reports is disclosed without delay in a non-discriminatory manner to the public. An established electronic news distributor is used which ensures that First North, the media and the public can access published information at the same time and without delay.

10.2 Press releases

All press releases must include the time and date when the information was submitted for publication, the Company's name, address of the Company's website, contact person (with telephone number) and the name of the Company's Certified Advisor. Each press release must have a headline describing the main content and an introductory section where the most important information is clearly stated. Interim reports and year-end reports are also published as press releases.

When the Company is obliged to publish information pursuant to the EU Market Abuse Regulation, the Financial Instruments Trading Act (1991:980) or the Securities Market Act (2007:528), it must be stated in the press release that this is information that the publisher must disclose in accordance with these laws.

Interim reports and year-end reports are also published as press releases.

The Managing Director is responsible for compiling and distributing press releases, interim reports, year-end reports and annual reports, and must approve these. Only the Managing Director, the Deputy Managing Director, IR Manager or Chairman of the Board comment on financial press releases.

Press releases are divided into three categories

- A. Legal and financial press releases
- B. Press releases regarding other capital market information
- C. Press releases regarding non-financial information

A: Legal and financial press releases

Heimstaden's legal and financial press releases can be:

- Interim report - published the day after it was adopted at the Board meeting. The interim report is published no later than two months after the end of the reporting period
- The year-end report shall be submitted no later than two months after the end of the financial year and shall be published the day after it is adopted at the Board meeting.
- Notice of the Annual General Meeting shall be given in connection with publication, but no later than the evening before it is submitted to the newspaper and before it is published on Heimstaden's website
- A communique from the Annual General Meeting shall, immediately after the AGM, detail important decisions made by the meeting
- Other price-sensitive information - press releases should be sent out in cases where Heimstaden believes that a new development can be assumed to have an impact on the business

B: Press release regarding other capital market information

Other capital market information, i.e. news that is not considered to be price-sensitive, shall be communicated via a press release if it is in any way deemed to contribute to Heimstaden's business goals, such as organizational and management changes, changes in the business area or services offered etc.

C: Press release regarding non-financial information

Non-financial information, i.e. news mainly related to local activities and which is neither of a financial or price-sensitive nature is communicated to the relevant market via a press release. All press releases must be approved by the Company's Managing Director or other person delegated by the Managing Director.

10.3 Annual General Meeting

The Managing Director, the Deputy Managing Director and the Chairman of the Board are responsible for the planning and implementation of the Annual General Meeting. Notice of the Annual General Meeting shall be made in the manner specified in the prevailing Articles of Association for the Company and in accordance with the Rules and applicable law.

No later than in connection with the third interim report for the financial year, the time and venue for the Annual General Meeting shall be published on the Company's website. Details of the deadline by which a request from shareholders to have a matter dealt with at the meeting must have been received in order to be included in the notice.

On the website, material for the Annual General Meeting, such as notice and other documents, must be provided in sufficient time for the Company's shareholders to be able to form a well-founded opinion on the matters to be handled. The timing for the publication of material before the meeting is decided in consultation between the Managing Director, the Deputy Managing Director, the IR manager and the Company's Chief Legal Officer.

After the meeting has ended, information shall be distributed immediately if the decisions of the Annual General Meeting have been made via a press release.

10.4 The Company's website

The Company's website (www.heimstaden.com) is the primary source of information for the Group's stakeholders. The website publishes information according to this policy and the Rules. The Managing Director is responsible for the website, ensuring that it is kept up to date and that it describes the Company's operations in a correct and up to date manner. Information disclosed to the market by the Company shall be published on the website as soon as possible after disclosure.

The information on the Company website shall be simple, clear and relevant and contain contact information for relevant persons in the Company. Information about the Annual General Meeting, Articles of Association, Board members, senior executives, contact information and information about the Company's Certified Advisor is published in addition to press releases and reports.

Information published on the Company's website in accordance with the Rules and this policy shall remain on the website for at least five years from the date of publication. Financial reports must remain on the website for at least five years from the date of publication.

11. SELECTIVE INFORMATION DISCLOSURE

11.1 General

Analysts have a central role in the stock and capital markets and it is important that the Company has contact with them. At the same time, it is important that these contacts are handled correctly. According to the Rules, price-sensitive information must not be submitted to analysts, journalists or others if it is not simultaneously submitted to the market.

Exceptionally, in special cases, unpublished price-sensitive information may be provided to outsiders (selective information) without being simultaneously disclosed:

- information to major shareholders or prospective shareholders when testing interest for a planned new share issue;
- information to advisors that the Company uses for inter alia prospecting work prior to a planned issue or other major transaction;
- proposed bidders or target companies in connection with negotiations on takeover bids;
- information requested by credit rating agencies; or
- information on investment plans and expected profitability developments prior to important credit decisions.

The ability to make exceptions should be used with great restriction and with constant consideration of whether the requested information is needed for the purpose. The Company must make it clear to the recipient of the inside information that the recipient has access to inside information, the legal obligations that this entails, and what sanctions can be applicable in case of abuse or unauthorized dissemination of the inside information to which the person has access, see Heimstaden's Insider Policy for examples of such notification. Furthermore, Heimstaden shall ensure that the person receiving access to inside information is added to the Company's insider list and inform the person that this has taken place. Confidentiality agreements shall also be established between the parties.

11.2 Insider list

Heimstaden shall create and continuously update an insider list of all persons who have access to inside information due to employment or carrying out assignments for the Company,

The insider list should be updated promptly when a new person has access to inside information, when the reason why a person appears on the insider list changes and when a person no longer has access to inside information. The insider list must be up to date and this normally means that changes must have been made to the list within 24 hours of the event.

The list shall be kept for at least five years after its creation or after the date on which it was last updated. The insider list shall, upon request, be submitted to Finansinspektionen as soon as possible.

The IR manager shall be responsible for maintaining the insider list, but the IR manager can also delegate the responsibility and appoint persons who are practically responsible for the actual maintenance of the insider list. In the Company, the IR manager has not delegated the responsibility to maintain the insider list. For more information about Heimstaden's handling of inside information, please refer to the Company's Insider Policy.

11.3 Policy regarding the public offer of acquisitions

If preparations are underway within the Company to provide a public offer for the acquisition of shares or equivalent financial instruments in another listed company to a wider audience, the Company shall immediately notify First North when there is reason to believe that the preparations will lead to a public offer. An Insider list shall then be kept. If the Company has been informed that another party is planning to submit a public offer to the Company's owner for the acquisition of shares or equivalent financial instruments in the Company, and this has not been made public, the Company shall immediately inform First North that there are reasonable grounds to believe that the plan will be realized. In the case of major acquisitions, the disclosure of information is covered by a comprehensive regulatory framework.

11.4 Policy regarding analyst contacts

Under no circumstances may the Company disclose insider information selectively. However, it is permissible to provide unpublished information to analyst contacts as long as this does not constitute inside information.

For example, it may be considered permissible to:

- remind the recipient of previously submitted information
- correct misunderstandings, miscalculations and obvious misconceptions
- provide industry statistics

Information provided at analyst meetings or similar must be previously known or have been published before such meetings. Should insider information be accidentally submitted at an analyst meeting, for example in response to a question, the Company must immediately publish the information through a press release. If this is not possible, the Company must immediately contact the stock exchange.

The following applies to the Company's analyst and media contacts:

If an analyst has received certain information, the Company cannot deny the same information to another analyst or a journalist. This should be included in the Company's assessment of whether the information can be disclosed.

- The Company must be prepared to provide the same information to the media.
- It is forbidden to provide analysts or journalists with information about a forthcoming news item, even if they promise not to publish it before publication. The Company should always invite the media to analyst conferences to reduce the risk of such meetings being deemed suspicious.
- Analysts should be treated fairly and gain access to the same information, whether they represent a small or large owner, or analysis firm. Companies may distribute analyst reports. In order to avoid the risk that the Company sanctions what is stated in the report and thereby provides selective information, the Company shall instead refer to the respective analysis company. Also state the name of analysts (after permission from the person concerned) in the Company's annual report and on the Company's website. At meetings with individual contacts from society and the media or with individual analysts ("one-to-one meetings"), documentation such as the invitation, printed material and participant lists from these meetings must be archived. In some cases, a memorandum must be drawn up and archived in which the names of persons who have been notified are stated.

12. CRISIS MANAGEMENT

In the event of a crisis and negative publicity, it is always the Managing Director who decides on the media strategy, or if the particular issue concerns them, the Chairman of the Board.

First North and the Certified Advisor should always be contacted for advice. It is then appropriate that the CEO convenes a “crisis group”. The Communications Manager and IR manager should always be included in this. It should then be decided whether a “press service” for the matter in question should be established.

Internal information should be sent immediately and this is the responsibility of the IR manager. Issues that are dealt with in this way should always be evaluated internally when completed so that preparedness can be constantly improved. This also applies to subjects that are exposed to extremely strong media coverage.

Examples of factors which can cause the crisis organization to be implemented are:

- Risk of serious damage to the Company’s reputation or image:
- A department is closed down
- Major issue with in the fulfilment of applicable laws and regulations, for example stock exchange rules
- Lack of judgement by executive personnel
- Significant financial damage or risk of such
- Fire in a property

We have three central crisis management documents:

- This information policy
- A crisis management to be available at each business office and on the Company’s Intranet
- Chain of alarm to be set up at each business office

13. INTERNAL INFORMATION POLICY

13.1 General

The Company is a professional organization within property ownership, real estate transactions and real estate management (Real Estate). The Company shall manage and disseminate knowledge within its area of expertise, while at the same time developing new knowledge. Personnel are the most important resource in a knowledge organization such as the Company. It is therefore important to involve and engage the staff in order for the Company to achieve its goals. Well-functioning internal information/ communication is one of the cornerstones for ensuring knowledgeable and committed staff who are also the Company’s face to the outside world.

Internal information forms the basis for outward-oriented business. Personnel are the most important messenger of the Company’s profile and are the prerequisite for building confidence in the Company’s business.

All internal information must take into account the Rules, which may impose restrictions on the scope of the internal information. Not all information can be passed on to all employees because of the Rules and for competition reasons.

13.2 Different types of internal communication

Internal communication for employees and consultants can be divided into:

- work communication: to be able to handle their daily work
- news communication: the latest events that have happened that they should know in order to be able to handle their work duties
- management communication: that which regulates the business (budget, goals, long-term planning)
- change communication: events that lie outside the normal news flow, major changes,
- cultural communication: an invisible part of internal communication All these types of communication shall be developed.

13.3 Objective

By developing internal information/communications, the Company aims to increase employees' knowledge and give them an opportunity to give their views on the business.

Good internal communications improves the Company's ability to achieve its goals. It is particularly important to increase communication across the organization and between units. Developing internal communications is a process in which senior executives are important role models.

However, it is always the individual employee's duty to actively keep himself/herself sufficiently informed to be able to handle his or her duties. Functional internal information:

- creates agreement on objectives
- gives employees an overview of the situation
- provides a better basis for decisions,
- provides participation in decisions
- creates motivation
- facilitates delegation (of responsibility)
- contributes to personal development
- increases efficiency

14. OTHER

The IR manager is responsible for ensuring that the relevant personnel receive regular training and information on issues relating to rules regarding information disclosure for listed companies and that all personnel follow this information policy and the Company's insider policy.

15. REFERENCE INFORMATION

Chairman of the Board	Ivar Tollefsen
CEO	Patrik Hall
IR Manager	Carl-Fredrik Streiby
Chief Communications Officer	Karmen Mandic
Certified Adviser	Erik Penser Bank
IR agency	RHR
Established electronic news distributor	Cision

ANNEX 8.2 (a)

Decision template for postponed disclosure for Heimstaden AB (publ)

Insider case: [Event, circumstance or project name]

1. Decision on postponed disclosure		
a) Time when the insider information first arose at Heimstaden	[Date]	[Time]
b) Time when the decision was taken to defer the disclosure of inside information	[Date]	[Time]
c) Time when Heimstaden estimates that the insider information will be published	[Date]	[Time]
(d) Reason for extending the initial period of deferment (if applicable)	[Date]	[Time]
2. Persons that are responsible to have made the decision to postpone the disclosure		
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
3. Persons that are responsible to guarantee the ongoing control of the terms for the postpone		
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
4. Persons that are responsible to made the decision to make the insider information public		
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
[First name]	[Surname]	[Position]
5. Person that is responsible to send information and written explanation to Finansinspektionen		
A) Name	[First name]	[Surname]
b) Position at Heimstaden	[Position]	
c) Contact details	[Email]	[Telephone number]

6. Motivation to the original fulfilment of the terms in article 17.4 in MAR	
A) Justification/evidence that an immediate public disclosure would be likely to harm Heimstaden's legitimate interests	[Text]
b) justification/evidence that deferment does not mislead the public	[Text]
c) Justification/evidence that Heimstaden can ensure that the information remains confidential	[Text]
7. Description of obstacle and system to secure the confidentiality of the insider information	
(a) A description of the information barriers established to prevent access to insider information for persons other than those in need of it as a normal part of the performance of their service, activities or duties at Heimstaden	[Text]
(b) Description of the systems established to publish the relevant inside information as soon as possible when confidentiality is no longer guaranteed	[Text]

ANNEX 8.2 (b)

Notification to Finansinspektionen of deferred publication for Heimstaden AB (publ.)
When an issuer has deferred disclosure of inside information and then publishes it,
Finansinspektionen shall immediately be informed of this.

At the request of Finansinspektionen, the issuer must also provide a written explanation of how the conditions for the deferred publication have been fulfilled.

The information email to Finansinspektionen shall have the following design/content:

Till: finansinspektionen@fi.se
Ämne: Artikel 17 Heimstaden AB (publ)
<p>Hej,</p> <p>Detta mail rör Heimstaden AB (publ)] (“Heimstaden”). Undertecknad skickar detta mail i egenskap av [<i>beskrivning av avsändarens tjänst/roll</i>] på Heimstaden.</p> <p>Heimstaden har offentliggjort insiderinformation som varit föremål för uppskjutet offentliggörande. Detta har skett genom pressmeddelande med rubriken [<i>rubrik</i>] vilket offentliggjorts och spridits genom Cisions system kl [<i>tidpunkt</i>] den [<i>datum</i>].</p> <p>Pressmeddelandet finns även tillgängligt på [<i>länk till hemsida</i>].</p> <p>Beslutet att skjuta upp offentliggörandet av insiderinformationen fattades kl [<i>tidpunkt</i>] den [<i>datum</i>]. De ansvariga för beslutet att skjuta upp offentliggörandet av insiderinformationen var: [<i>namn</i>] ([<i>tjänst/roll</i>]), [<i>namn</i>] ([<i>tjänst/roll</i>]) och [<i>namn</i>] ([<i>tjänst/roll</i>]).</p> <p>Med vänliga hälsningar</p> <p>[<i>namn</i>]</p> <p>[<i>tjänst/roll</i>]</p> <p>[<i>mejladress och telefonnummer i tjänsten</i>]</p>