

Lindab

COMMUNICATION POLICY

Table of content

1. Introduction	3
2. General guidelines and objectives	3
3. Responsibilities	3
4. Spokespersons	4
5. Inside and/or confidential information	5
5.1 Definition of inside information	5
5.2. Confidential information	5
6. External communication.....	5
6.1. Press releases.....	6
6.2. Financial reports.....	6
6.3. Shareholders' meetings.....	6
6.4. Contact with the media	7
6.5. Contacts with financial analysts.....	7
6.6. Silent period	7
6.7. Website	7
6.8. Lindab on social media.....	8
6.9. Customer communication.....	8
6.10. Sponsorship	8
6.11. Use of Lindab's name by external parties	8
7. Employee communication.....	8
8. Communication in the event of leaks and crises	9
8.1. Information leaks	9
8.2. Crisis communication	9
9. External resources	10

1. Introduction

This policy sets the standards of Lindab's communication activities and applies globally to all Lindab companies and entities and their employees. The purpose of this policy is to assist and give guidelines to Lindab's employees for how they should act in daily communication with colleagues and external stakeholders as well as to ensure that all Lindab communication activities are conducted in accordance with applicable laws and regulations, and in accordance with Lindab's ethical principles and values, as described in the Lindab Code of Ethics.

Lindab is a Swedish company listed on NASDAQ Stockholm. The Communication policy, together with the Insider policy, comply with the Nordic Main Market Rule Book for Issuers and the Swedish Companies Act. In addition, the communication and dissemination of information regarding a listed company are subject to requirements stipulated in the Swedish Corporate Governance Code and this policy is intended to meet or exceed these requirements, as applicable.

The Lindab Communication Policy is supplemented by Lindab's Communication guidelines with hands-on guidelines and recommendations for media interviews, social media interactions, e-mail communication, meetings etc. The Communication guidelines are approved by the Group CEO.

2. General guidelines and objectives

The overall objective of Lindab's Communication Policy is to support Lindab's business goals and operations. Lindab should aim at creating and maintaining good relations internally and externally.

- The communication shall be correct, relevant, timely and clear.
- The message and channels shall be adapted to the recipient.
- Lindab is working long term and shall prioritize continuous communication.
- Lindab is aiming at being as open and transparent as the regulations and business considerations allow us to be.

3. Responsibilities

If the Board of Directors of Lindab International AB makes decisions or otherwise handles information that may qualify as regulatory information; i.e. either inside information or other information required to be immediately disclosed further to the Nordic Main Market Rule Book for Issuers or applicable laws, the Chairman of the Board is responsible for that the information is immediately made available to the CEO or the General Counsel, so Lindab can fulfil its obligations to disclose the information in the correct way.

The CEO is ultimately responsible for Lindab's communication strategy and ensuring that Lindab acts in accordance with the Communication Policy and the Insider Policy.

Part of the CEO's responsibility is delegated to the Chief Financial Officer (CFO), who is responsible for financial reporting, and to the General Counsel responsible for that Lindab's communication follows all applicable laws and regulations as a listed company.

All regulatory information must be reviewed and approved by the CEO prior to publication.

The Group's subsidiaries/divisions/functions are responsible for

- The local information process and local crisis organisation.
- Ensuring that locally produced material complies with the Group's values and brand guidelines, as well as legislation and policies.
- Ensuring that no insider information is included in the local communication. All insider information is to be communicated on Group level.

All managers are responsible for keeping their direct reports updated on company information such as strategy, vision and values as well as global and local news and activities relevant for each employee, and to share information needed for the employees to fulfil their work tasks.

Each employee is responsible for compliance with Lindab's Communication Policy, for actively and continuously searching for information relevant for his/her role, for sharing knowledge within the Group and for keeping their manager and colleagues informed about their own work.

4. Spokespersons

The Chairman of the Board, or an individual appointed by the Chairman, shall act as spokesperson for owner- and board-related issues.

The CEO is the primary spokesperson on general Group issues such as financial position, business strategies, and market and competitor analyses. In all matters that include inside information, either the CEO, CFO, Head of Corporate Communications or a person that the CEO has appointed, should speak on behalf of Lindab.

The Head of Corporate Communications serves as a spokesperson for the media and the public, answering general questions and informing about areas already communicated or well known. Corporate Communications may also select suitable individuals to respond to specific questions from the media and the public.

Other members of the Group management team (GMT) can act as spokespersons on issues that relate to ongoing operations within their respective areas of responsibility, although not on issues that may be considered inside information. As a general rule, these GMT members should co-ordinate with Corporate Communications ahead of any media contacts and they are also responsible for immediately reporting contacts with the media and other external parties of importance to Corporate Communications.

For local communication, Group management members can assign local spokespersons. The local spokesperson may not comment on topics or activities related to the Group.

All spokespersons must have access to relevant information regarding the Group's position and development and the areas in which they are experts. They must also be very familiar with NASDAQ Stockholm's rules.

Other employees are not permitted to make statements on behalf of Lindab without prior approval from Corporate Communications.

5. Inside and/or confidential information

The Market Abuse Regulation (MAR) specifies how Lindab is obliged to inform the public about inside information. The process and guidelines for how to manage inside information at Lindab are included in Lindab's Insider Policy and Guidelines. If the information is not considered inside information, the Lindab Communication Policy is the steering document to refer to.

5.1 Definition of inside information

According to MAR, inside information:

- is of a precise nature;
- has not been made public;
- relates directly or indirectly to one or more issuers or financial instruments; and
- if it was made public, would be likely to have a significant effect on the prices of those financial instruments or related financial instruments.

The test for determining whether information would have a significant effect on price is that of the reasonable investor – i.e., would a reasonable investor be likely to use the information as part of the basis for his/her investment decisions?

5.2. Confidential information

Information related to Lindab's business can still be confidential, even if it's not classified as inside information. All employees have the responsibility to handle confidential information with care and not reveal the information to any party, inside or outside the company, without approval.

6. External communication

The external communication should support Lindab's business goals and contribute to strengthen the Lindab brand.

In our external communication:

- We speak about Lindab in a positive, but not exaggerated or untruthful way.
- We use messages in line with the agreed marketing plans.
- We don't talk negatively about competition.
- We avoid any association with violent, aggressive, dangerous or anti-social behaviour and any association with religion, politics, drugs or drug culture.

- In general, we don't support political movements or political messages, even if it's for a good cause. If we decide to support it from Lindab we must be trustworthy by backing it up with real actions, consider the message we send by supporting one cause but not another cause, and consider the risk of a movement or a hashtag to turn into a negative matter. If we would like to make a political statement it should be approved by the CEO.
- We respect users' privacy and obtain consent before sending out direct marketing communications.

6.1. Press releases

All regulatory information must be distributed via press release (see also Lindab's Insider Policy and Guidelines) in compliance with the Nordic Main Market Rule Book for Issuers and applicable laws.

Press releases with regulatory information is to be approved by the CEO. Press releases related to the Board of Directors or of greater significance is be sent to the Chairman to decide whether the entire Board of Directors should approve the press release. In exceptional cases, if the CEO is not available and publication is urgent, approval may be given by the CFO or General Counsel.

Press releases with regulatory information should be issued in Swedish and English and include the legend specified in the Lindab Insider policy and guidelines, as applicable. The press release will be published via the approved press release distribution system by a person approved by the CEO.

Non-regulatory information, to inform about products/services and strengthen Lindab's brand, may also be communicated in a press release. Such press releases are to be approved by Corporate Communications.

Keep in mind that press releases are distributed online which means that press releases issued locally may still be spread to a global audience, even if only published in a specific country.

If there is any doubt if the content is regulatory information or not, consult Corporate Communications or the General Counsel.

6.2. Financial reports

Financial reports must contain the information stipulated in the Nordic Main Market Rule Book for Issuers, and be prepared in accordance with applicable laws or other statutes, and the generally acceptable accounting policies for listed companies. The publication of financial reports is handled in the same way as a press release. For each financial report a decision is made whether it is classified as inside information or not.

6.3. Shareholders' meetings

The Swedish Corporate Governance Code, the Nordic Main Market Rule book for Issuers, the Swedish Companies Act and Lindab's articles of association govern the procedures regarding general meetings of shareholders.

If Lindab intends to provide inside information at the general meeting, this information must be made public, no later than when it is presented at the meeting, so it becomes available to

the entire market at the same time. After a shareholders' meeting, Lindab must always publish a press release with information regarding the major resolutions taken at the meeting. This applies even if the resolutions are in accordance with previously published proposals.

6.4. Contact with the media

The purpose of Lindab's information to the media is to increase knowledge about the Group and its operations in such a manner that the media presents an objective, relevant and correct impression of Lindab. All contacts with the media must respect the restrictions that apply to listed companies.

If inside information is shared unintentionally, a press release must be immediately released.

6.5. Contacts with financial analysts

Contacts with financial analysts are handled by the CEO, CFO and Head of Corporate Communications. These persons are responsible for building long-term and positive relations with this target group and providing them with professional service in accordance with laws, regulations and policies. They must comply with the listing agreement in all of its aspects and not provide insider or selective information.

If inside information is inadvertently provided at a meeting, a press release must be issued immediately with the disclosed information.

If an analyst has received certain information, Lindab cannot refuse to provide the same information to another analyst or journalist. This should therefore always be included in the assessment of whether information can be disclosed or not.

It is absolutely prohibited to provide analysts with information in advance regarding a forthcoming news item, even if they promise not to publish it prior to disclosure. Nothing may be considered "off-the-record." All information provided must be regarded as public.

6.6. Silent period

To reduce the risk of information leakage and of stakeholders being suspected of having gained access to insider information, Lindab applies what is called a silent period 30 days prior to the publication of year-end and interim reports. During this period, representatives of Lindab must refrain from answering questions or commenting on financial developments with reference to the silent period. If an analyst requests comments on analyses and reports, only evident factual errors may be addressed. It may also be permissible to provide information on circumstances previously disclosed, or evident logical errors and to provide official industry statistics.

6.7. Website

The website is the primary online channel used by Lindab. The website contains information aimed at all of Lindab's target groups, primarily customers, the financial markets, media and potential employees.

Lindab's ambition is that all significant information will be published on the website with the least possible delay. Requirements for websites for public companies, as described in the

Nordic Main Market Rule Book for Issuers and the Swedish Corporate Governance Code, are to be followed.

6.8. Lindab on social media

The social media communication follows the same policy and rules as Lindab's other external communication, but the tone of voice and the messages as such can be less corporate and more informal, depending on the channel. Whenever possible, the aim is to interact more frequently with the audience.

6.9. Customer communication

Each country and region are responsible for their customer communication.

6.10. Sponsorship

Sponsorship is a business relationship. Lindab should select sponsorship projects with the aim to strengthen the brand, market Lindab or our products or services, or to strengthen the community where Lindab is doing business. In addition to these guidelines, the Lindab Anticorruption Policy provides legal restrictions for interactions with external parties.

Prioritized areas are:

- Youth
- Health
- Environment
- Education
- Sport

Lindab's regions/divisions/functions select which sponsorship they want to engage in. All sponsorship agreements should follow the Communication Policy and the Anti-Corruption Policy.

6.11. Use of Lindab's name by external parties

The use of Lindab's name or logo by external parties need approval from Corporate Communications or local Marketing. The usage of Lindab's logo and name is normally included in sponsorship and partnership agreements. Lindab will normally grant approval if the product or service is used by and appreciated by Lindab, and the external party represents values that are in line with Lindab's brand and values. All usage of the name and logo must follow the Lindab Brand guidelines. Corporate Communications can withdraw the right to use Lindab's name or logo if it is misused by the external party.

7. Employee communication

The general guideline for employee communication is that Lindab is open and transparent. Information should be accessible for all employees if it's not related to sensitive personal data or considered business sensitive. To avoid information overflow, the information should be structured and searchable, but not be pushed to the employee if it's not directly related to his/her job role or job tasks. Each employee has the responsibility to actively search for information to stay updated.

In their communication, internal as well as external, employees are not allowed to:

- use inappropriate or illegal content, including offensive language or offensive jokes
- engage in illegal activities
- encrypt personal communication
- block Lindab to access company accounts

All communication through Lindab's systems, using Lindab's accounts or communication made in the name of Lindab, is the property of Lindab. Communication in Lindab's systems may be monitored and read by approved employees of Lindab.

Lindab's Communication guidelines covers recommendations for employee communication such as e-mail, intranet, social media, meetings, etc.

8. Communication in the event of leaks and crises

8.1. Information leaks

Information leaks and rumours can cause considerable damage in the form of disruptions, negative publicity or lost business and erosion of confidence in Lindab. To prevent leaks from arising, Lindab establishes non-disclosure agreements with external parties, maintains logs for projects including inside information and restricts the spread of information internally. Lindab's policy is not to comment on speculations and rumours. Anyone becoming aware of rumours or leaks should immediately report them to the CEO, CFO or Corporate Communications.

The Insider Committee determines whether the rumour is serious and thus may result in damage to Lindab, whether it is deemed to be damaging for the stock market's confidence in Lindab, or whether it is classified as inside information. If so, Lindab should consider providing clarification as soon as possible via a press release.

In situations where decisions of great importance for the company are planned, such as in bidding situations, Lindab must maintain a high state of readiness to provide information very quickly by preparing press releases and contacts with the decision makers so that the damage from information leaks can be reduced.

8.2. Crisis communication

A crisis is a situation in which events beyond Lindab's control threaten to damage the company's relations with shareholders, customer and employees. Lindab shall always strive to act openly and honestly and provide facts internally and externally.

Example of crisis situations:

- Death or serious injury of Lindab employees
- Fire or severe damage to Lindab operations
- Sabotage, data intrusions, kidnapping
- Illegal actions performed by Lindab employees such as fraud and bribery
- Environmental damage
- Financial crisis situations

If a crisis situation occurs, the Chairman of the Board, the CEO and the CFO must be informed immediately. These persons are responsible for deciding whether a public statement shall be issued and what information shall be provided. The CEO, CFO, General Counsel and Head of Corporate Communications comprise the crisis organisation and are supported, as necessary, by other members of the GMT. Each unit within Lindab should have a local crisis plan. Local crisis situations that threaten Lindab Group's reputation should always be managed on Group level.

9. External resources

The rules and regulations that are referred to in this document are to be found at:

- Swedish Corporate governance <http://www.corporategovernanceboard.se/>
- Nasdaq Stockholm's rules and regulations
- Swedish Financial Supervisory Authority's (FI) <https://fi.se/en/>
- Market Abuse Regulation (full EU version) <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R0596&qid=1467119015780&from=EN>
- Swedish Companies Act (in Swedish) https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/aktiebolagslag-2005551_sfs-2005-551
- Lindab's articles of association <https://www.lindabgroup.com/corporate-governance/governing-documents/articles-of-association/>

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