



# Information Policy of the Ölgerdın Group

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## 1. Purpose and scope

1.1. This Information Policy applies to Ölgerðin Egill Skallagrímsson hf. (hereinafter referred to as “Ölgerðin” or the “Company”) and its subsidiaries (hereinafter referred to as the “Ölgerðin Group”). The Policy applies to employees and members of the Board of the Ölgerðin Group and, as applicable, to those who provide information on behalf of the Company.

1.2. The main stakeholders covered by this Policy, in addition to the employees and board members, are shareholders, customers, lenders, rating agencies, analysts, Nasdaq Iceland, and the media.

1.3. The purpose of this Information Policy is to ensure that stakeholders have equal access to accurate, timely, and reliable information about the operations of Ölgerðin. In this way, they can have easy access to necessary and up-to-date information in order to form an opinion on the financial instruments issued by the Company that are trading on a regulated market. The objective of the rules is also to promote good relations with stakeholders and to increase their knowledge and understanding of the Company’s operations.

1.4. Information shall be provided in accordance with, inter alia, Act No. 20/2021 on the Disclosure Obligations of Issuers of Securities and Notification Duties, Act No. 60/2021 on Measures Against Market Abuse, and rules issued or implemented pursuant thereto as well as Nasdaq Iceland’s rules for issuers of financial instruments.

1.5. This Information Policy shall be considered the Company’s policy on disclosure and communication with the above-mentioned stakeholders and others.

## 2. Publication of information

2.1. Information subject to the Company’s disclosure obligations is disseminated by the Company through the GlobeNewswire news service, where it is made publicly available to the public in the European Economic Area, and is simultaneously published on Ölgerðin’s investor website: [www.olgerdin.is/fjarfestar/yfirlit](http://www.olgerdin.is/fjarfestar/yfirlit).

Equal treatment of investors regarding access to information as well as transparency in disclosure must always be ensured. As a general rule, price-sensitive information shall be published after market closing, insofar as possible.

2.2. Emphasis shall be placed on ensuring that the information disclosed is accurate, relevant, clear, and in no way misleading.

2.3. Information published pursuant to Article 2.1 shall remain accessible on Ölgerðin's investor website for at least five years from its publication. Financial information will remain accessible for at least ten years from its publication. The Compliance Officer shall ensure such information is published via GlobeNewswire, or in their absence, their deputy.

### **3. Disclosure obligations**

3.1. Ölgerðin shall conduct its disclosure in accordance with the applicable legislation and Nasdaq Iceland's rules at any given time.

3.2. Ölgerðin shall publish a financial calendar on its website before the start of each financial year. Any changes to previously announced publication dates shall be disclosed.

3.3. Ölgerðin shall publish approved annual financial statements and interim reports publicly in accordance with the applicable legislation and Nasdaq Iceland's rules at any given time. The Company aims to hold information meetings for stakeholders following the publication of half-year and annual results, unless the Company deems a different schedule to be necessary. At such information meetings, Ölgerðin will assist in answering stakeholder inquiries to the extent permitted while ensuring the equal treatment of shareholders and investors in the market.

3.4. Forecasts of financial figures, such as earnings forecasts, will generally be published at the same time as the annual financial statements of the preceding financial year, unless special circumstances apply. Such forecasts generally cover the full financial year and apply to the entire Ölgerðin Group. Updates or changes to previously published forecasts will be disclosed with interim reports, unless otherwise required by laws and regulations.

3.5. Inside information shall be published as soon as possible. Publication of inside information may be delayed if the legal requirements are met.

3.6. In cases of doubt as to whether information should be disclosed under this Information Policy, applicable law, or Nasdaq Iceland's rules, a committee consisting of the CEO, Compliance Officer, and one key employee of Ölgerðin shall assess whether the information constitutes inside information. The same committee shall also assess whether the conditions for delaying disclosure are met. If the CEO and/or the Compliance Officer are unavailable, their deputies shall serve on the committee in their place. The Compliance Officer shall maintain a record of the committee's decisions and the reasoning behind them.

3.7. It is the Company's policy not to comment on matters relating to its operations, performance, or

financial position from the end of a reporting period until the publication of the corresponding financial results, unless the Company is required to do so or chooses to make such disclosure publicly.

#### **4. Deviations from previously published information**

Ölgerðin aims to publicly disclose information if management expects an annual impact amounting to 4% or more on the Company's projected operating profit before depreciation (EBITDA) for the current financial year, taking into account previously disclosed information. If operating profit has been projected within a forecast range, the percentage shall be calculated based on the median of that range.

#### **5. Publication of other information**

5.1. Ölgerðin aims to publish general news on the Company's operations, which do not fall under its disclosure obligations, on its website and, where applicable, send related press releases to the media.

5.2. It is Ölgerðin's policy not to disclose sensitive business information, such as sales figures, personnel matters, product development, or other information that is likely to affect its competitive position, unless laws or regulations require such disclosure. The Company and its representatives will not comment on fluctuations in share price or trading volume. The same applies to rumors and speculation in the market, unless otherwise required by laws or regulations.

#### **6. Communication with stakeholders**

Ölgerðin's objective is to maintain good relations with all stakeholders with the purpose of informing them about the Company's operations. For this purpose, the Company seeks to assist them in their coverage of the Company within the limits permitted by law and regulation. Stakeholder inquiries will be answered to the extent permitted, ensuring equal treatment of the shareholders and investors in the market.

#### **7. Spokespersons of Ölgerðin**

7.1. The CEO of Ölgerðin is the spokesperson of the Company on behalf of the Board. The CEO may authorize other employees to speak on specific aspects of the Company's operations, but otherwise

employees shall not speak on behalf of the Company. Employees shall not comment on the Company's performance, financial position, or matters affecting the value of the Company; only the CEO and the Chairman of the Board may do so. The Chairman of the Board is also the spokesperson of the Company in matters concerning major decisions of the Board.

7.2. All inquiries received by employees, e.g., from the media, shall be directed to Ölgerðin's media contact who will forward the inquiry to the appropriate party where applicable. At the time of the adoption of these rules, Ölgerðin's media contact is Dagný Kristjánsdóttir.

7.3. The CEO shall always represent Ölgerðin, except in exceptional cases. In matters relating to the Company's strategy, values, performance, position, or image, the CEO shall always respond on behalf of the Company and only the CEO. In cases where media inquiries relate to brand building, brand managers will respond themselves. This also applies to social media.

7.4. Stakeholders may direct inquiries regarding Ölgerðin to the CEO or the CFO, as further detailed on the Company's investor website. At the time of the adoption of these rules, the CEO is Andri Þór Guðmundsson and the CFO is Jón Þorsteinn Oddleifsson.

## **8. Implementation and review**

Implementation of this Policy is the responsibility of the Company's CEO. The Policy takes effect immediately, but it shall be reviewed regularly by the Company's Board.

Approved by the Board of Ölgerðin Egill Skallagrímsson hf. on February 13, 2024.