



# Gaming Corps

## Information and Communication Policy

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## 1. Approval

The Board of Directors approved this policy on January 31<sup>st</sup>, 2023.

## 2. Purpose

Gaming Corps AB (publ) (the “**Company**” or “**Gaming Corps**”) is a Swedish public limited liability company with its shares listed on Nasdaq First North in Stockholm, Sweden and with offices in Enköping, Sweden, Il-Kalkara Smart City, Malta and Kiev, Ukraine. The purpose of this policy is to ensure consistent, trustworthy, and correct information to, and communication with, all the Company’s internal and external stakeholders. The policy ensures that the Company distributes information and communicates through the proper channels, in a professional and timely manner and according to the laws and regulations that apply to publicly incorporated companies in Sweden as well as the regulations of Nasdaq First North. The Company’s objective must always be to shape information so that it is easily available to the recipient and in all other respects meets the requirements of its shareholders and other stakeholders.

## 3. Investor relations

The Company wishes to be transparent about its activities and transactions. All information that according to regulation can be considered inside information, i.e. sensitive to the market and the share price, is published immediately by way of a press release and thus spread to a number of reputable media outlets in Sweden, ensuring that all stakeholders are treated equally. Public disclosure of information must be in accordance with the applicable EU Market Abuse Regulation (“**MAR**”), Nasdaq Rule Book for Issuers (including guidance and recommendations) (the “**Rule Book**”) and other, from time to time, potentially applicable laws and regulations. Section 8, **Information & Insider policy**, outlines in detail the Company’s routines for ensuring that all demands regarding the dispersion of information are met.

## 4. The role of communication for Gaming Corps

When communicating, the Company strives to provide a reliable account of its performance and activities – internally and externally – and to ensure acceptance and understanding of its transactions. Transparency and an open dialogue based on trust about the Company’s current affairs, historic development, growth possibilities and conditions are the main elements of communication by the Company, a transparency only limited by legislation, the regulations of Nasdaq First North and competition. Furthermore, we wish to use communication to provide an accurate account of what the Company stands for – our business idea, vision, strategy, goals, values and brand. We aim to communicate in a way that strengthens our brand towards all stakeholders and ensures consistency between what we promise and what we deliver. Under section 9, **Communication Policy**, the Company’s routines for communication are outlined in detail, including employee code of conduct and the use of social media.

## 5. Languages

Regulatory press releases and communiqués are published in Swedish and English if applicable for any regulatory purposes. When deemed relevant the Company translates part of the press release to English and posts it as a news item on the website, where regulatory press releases



are clearly separated from news items. If needed and economically justified, a full translation of regulatory press releases and communiqués will be made available in English, in such an event the Swedish version shall always prevail in case of any discrepancies. Apart from the newsroom section for regulatory press releases, the Company website is solely available in English, as are social media channels. Due to the Company employing non-Swedish speaking staff and consultants, this policy is written in English. In such cases when English is used on the corporate level, the Company observes Oxford English.

## 6. Application and Tools

This policy covers all external information and communication, including but not limited to the following channels and tools:

- website
- press releases.
- social media.
- annual reports.
- financial reports.
- printed information material.
- digital presentation material.
- interviews in media outlets.
- written communication.
- oral communication (at meetings, in conversations with analysts/investors, over the phone).

## 7. Spokespersons

The CEO has the main responsibility for the Company's communications and relations with the capital market, authorities, politicians and mass media, a responsibility that is delegated in part to and/or equivalent person. The preparation of the Company's financial information is delegated by the CEO to the CFO. The CFO and the CEO are together responsible for ensuring that information is distributed to the financial market and other interested parties.

The CEO is the Company's primary spokesperson. Any employees who are contacted by analysts, investors, media outlets or shareholders shall immediately refer such persons to the CEO on proper course of action. Employees should only ever make statements about information that is already publicly known. Whenever any employee is contacted by media, analysts, or any such outside person the CEO shall directly be contacted by the employee to manage the contact further.

## 8. Information and Insider policy

### 8.1 INSIDE INFORMATION

In a listed company with financial instruments listed on a marketplace, all stakeholders must be given the opportunity to trade on equal terms. The main rule is that inside information that the Company has, or may have, must be available to all stakeholders at the same time, and all shareholders and potential shareholders must be treated equally.

Inside Information is information of a precise nature, which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments.

Inside Information is information that may affect the share price, such as major contracts and strategic co-operations, major events that may result in unexpected changes of the financial result or the business operations. Financial reports primarily comprised of information that may affect the share price. Inside Information must immediately be disclosed through a press release in accordance with MAR and the Rule Book. Delayed disclosure might occur (as always with financial reports prior 30 days before publication date) a logbook is opened and all relevant persons with inside information will be added and informed about their obligations towards the Rule Book and MAR (*more under section 8.2.1*). This will ensure that all stakeholders receive the information at the same time.

### 8.2 DISCLOSURE REQUIREMENTS

A fundamental prerequisite for an independent analysis of the Company's operations and overall value is that all interested parties are given the opportunity to receive the same information at the same time. According to MAR and the Rule Book, the Company must disclose information in a non-discriminatory manner. The assessment as to what is considered inside information shall be made on a case-by-case basis, and when in doubt the CEO, the CFO or any equivalent person in charge shall contact the Certified Adviser or Nasdaq's issuers surveillance department for advice. During ongoing trading procedures, this means that the publication may not take up more time than is required to be able to prepare and distribute the information. This requires good planning, i.e., that a preliminary press release is drafted before a decision is made, meaning that any press release which may be prepared ahead of disclosure always shall be prepared, for example during on-going negotiations or when a decision has been made to postpone disclosure of inside information. If an event occurs that is outside the Company's control, the Company shall publish a statement on the event as soon as possible.

MAR(Market Abuse Regulation) constitutes the legal requirements regarding handling of inside information and the Rule Book (section 4.1) provides guidance on handling of inside information and what should be regarded as such. It for example mentions that the Company must, as soon



as possible, make public each decision and each circumstance that may have a significant impact on the Company's share value. According to the Rule Book, any information which, if it were made public, would be likely to have a significant effect on the on the valuation of the Company's share must be communicated publicly. Disclosure requirements apply in, but are not limited to, the following situations:

- orders or investment decisions;
- co-operation agreements or other agreements of major importance;
- business acquisitions and divestitures;
- price or exchange rate changes;
- credit or customer losses;
- new joint ventures;
- research results, development of a new product or important invention;
- commencement or settlement of, or decisions rendered in, legal disputes of significant nature.
- financial difficulties;
- decisions taken by authorities;
- shareholder agreements known to the Issuer which may affect the use of voting rights or transferability of the financial instruments;
- market rumours and information leaks;
- liquidity provision agreements;
- information regarding subsidiaries and affiliated companies;
- auditors' reports;
- deviation in financial result or financial position; and substantial changes to the operations of the Issuer.

The Rule Book also states that certain regulatory information must be made public, regardless of whether it is to be regarded as inside information or not. It must be noted, however, that events falling under regulatory disclosure requirements may also qualify as inside information. This applies, for example, to:

- summarized financial statements as soon as the Board has approved the preliminary closing figures
- interim financial reports
- notice of shareholders' meetings
- communiqués from shareholders' meetings
- any changes made to the composition of the Board, significant changes to the management team or any departure, termination or change of auditor
- termination of contract with liquidity guarantor
- transactions between the Company and related parties that do not fall under the Company's ordinary business
- the issuance of shares or share-related instruments
- a decision to introduce a share-based incentive programme
- trade at other trading venue
- qualified audit reports immediately following submission to the Company if such reports are impure or do not include the standard content.



All other matters of significant importance will be assessed by the management team on a case by case basis. The Certified Adviser should be contacted whenever there is doubt as to whether something should be made public or not.

## 8.2.1 DELAY OF PUBLIC DISCLOSURE OF INSIDE INFORMATION

A fundamental prerequisite for an independent analysis of the Company's operations and overall value is that the Company may delay making inside information public provided that:

1. Immediate disclosure is likely to prejudice the legitimate interests of the Company;
2. Delay of disclosure is not likely to mislead the public, *and*
3. The Company is able to ensure the confidentiality of that information.

A decision to delay the public disclosure of inside information shall be put in writing, outlining the reasons why *all* three points above have been satisfied. In conjunction with the documentation of the decision an insider list is to be established, both the decision and the insider list are to be documented using the digital service provider Logwise or any equivalent service. The assessment of whether information is to be regarded as inside or not, as well as the decision to delay, shall be made by the Company's management, primarily by the CEO, the CFO and/or equivalent person, and noted in a set of formal minutes. The CEO is responsible for the establishment of the digital documentation and establishing an insider list and for notifying all persons registered on the insider list and/or sub-list of any person who may have the information outside of the Company when an Insider Log is created. If the conditions for a delay changes, a new assessment must immediately be made as to whether the conditions for delay still apply. The new decision shall also be documented using the same digital service. The Certified Adviser shall be informed whenever the Company decides to delay public disclosure of inside information as soon as the Certified Adviser has been informed of the information.

For the purposes of the above stated, the cases where immediate disclosure of inside information is likely to prejudice the Company's legitimate interests could include but are not limited to the following circumstances:

- a) Gaming Corps is conducting negotiations, where the outcome of such negotiations would likely be jeopardized by immediate public disclosure. Examples of such negotiations may be those related to mergers, acquisitions, splits and spin-offs, purchases or disposals of major assets or branches of corporate activity, restructurings, and reorganizations.
- b) The financial viability of Gaming Corps is in grave and imminent danger, although not within the scope of the applicable insolvency law, and immediate public disclosure of the Inside Information would seriously prejudice the interests of existing and potential shareholders by jeopardizing the conclusion of the negotiations designed to ensure the financial recovery of the Company.
- c) The Inside Information relates to decisions taken or contracts entered by a management body of Gaming Corps which need, pursuant to national law or the articles of association, the approval of another body





of the Company, other than the shareholders' general assembly, in order to become effective, provided that.

- i. Immediate public disclosure of that information before such a definitive decision would jeopardise the correct assessment of the information by the public; and
  - ii. The Company arranged for the definitive decision to be taken as soon as possible.
- a) Gaming Corps has developed a product or an invention, and the immediate public disclosure of that information is likely to jeopardise the intellectual property rights of Gaming Corps.
  - b) Gaming Corps is planning to buy or sell a major holding in another entity and the disclosure of such an information would likely jeopardize the implementation of such plan.
  - c) a transaction previously announced is subject to a public authority's approval, and such approval is conditional upon additional requirements, where the immediate disclosure of those requirements will likely affect the ability for Gaming Corps to meet them and therefore prevent the final success of the deal or transaction.

The situations in which delay of disclosure of inside information is likely to mislead the public includes at least the following circumstances:

- a) the inside information whose disclosure Gaming Corps intends to delay is materially different from the previous public announcement of the Company on the matter to which the Inside Information refers to; or
- b) the inside information whose disclosure Gaming Corps intends to delay regards the fact that the Company's financial objectives are not likely to be met, where such objectives were previously publicly announced; or
- c) the inside information whose disclosure Gaming Corps intends to delay is in contrast with the market's expectations, where such expectations are based on signals that the Company has previously sent to the market, such as interviews, roadshows or any other type of communication organized by the Company or with its approval.

A notice of delay of public disclosure must be submitted to the Swedish Financial Supervisory Authority. The notice to the SFSA is submitted simultaneously as the publication of the inside information and is made through the digital service provider Logwise. Gaming Corps must, upon the Swedish Financial Supervisory Authority's request, submit a written explanation of how the conditions for the delay of public disclosure have been met. This too is documented through the digital service provider Logwise, and the submission to the Swedish Financial Supervisory Authority is made automatically by the program and /or software.

### 8.2.2 PRIOR INFORMATION TO THE CERTIFIED ADVISER AND NASDAQ

Certain situations may require that the Company inform Nasdaq and its Certified Adviser, Eminova<sup>1</sup>, prior to an official announcement or future event. For example, but not limited to:

- A recommendation from the Company's auditor regarding situations that can be of importance to the valuation of the Company's shares.
- Preparations prior to public offer to acquire shares in another listed company.
- Information regarding another company's plans for a public offer to acquire shares in the Company.
- Unexpected changes in the Company's financial standing or development.
- New scheduled issuances, split, name change or similar events.

### 8.2.3 OBLIGATIONS TO CONTACT THE CERTIFIED ADVISER AND/OR NASDAQ

In accordance with section 4.8 in Nasdaq First North regulations, the Company shall always contact its Certified Adviser, Eminova, or Nasdaq when the following situations occur:

- Criticism has been aimed at the Board or CEO by the Company's auditor.
- Circumstances that may disrupt the ongoing trade with the Company's shares.
- Circumstances that may cause a postponement of publication of inside information.
- If the Company intends to publish particularly important information.
- If the Company intends to apply to de-list a listed instrument.

### 8.2.4 INSIDER LISTS

Inside information should be held within as small of a group as possible. Leakage of inside information may seriously damage the Company's business as well as result in illegal trading. The Company shall for this reason maintain a list of persons who have access to inside information, a so-called insider list, in accordance with the regulations specified in Article 18 in MAR. The purpose of the regulation is partly to facilitate investigations regarding illegal insider trading, partly to make it more difficult for persons with inside information to utilise such information for their own or somebody else's profit.

The insider list also constitutes a tool that gives the Company control over which persons possess specific inside information. The Company's insider list shall:

- List all the people that at any point have access to inside information. This applies to The Company's employees as well as persons who in other ways perform tasks on behalf of the Company such as consultants, advisors etc.
- Be divided into sections based on each individual insider event.
- Be updated as soon as circumstances change.
- Be documented digitally through the digital service provider Logwise.
- Be kept in storage for a period of at least five years from the date when it was established or updated; and
- Fulfil the format requirements outlined in the European Commission's implementation order (EU 347/2016).

### 8.2.5 PERMANENT INSIDER LIST

To avoid having more than one record per person throughout the insider list, the Company shall establish and update a supplementary section called "Persons with permanent access to inside information". This section shall only include persons that always have access to all inside information at the Company. An event-based insider list shall however always be established as soon as there is inside information that has not been

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<sup>1</sup> The Company's Certified Adviser is Eminova Fondkommission AB. Email: [info@eminova.se](mailto:info@eminova.se), phone: +46 8 684 211 00, website: [www.eminova.se](http://www.eminova.se)



published. The permanent insider list shall be attached to the event-based insider list within Logwise or any equivalent program/software.

## 8.2.6 PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES

The Board of Directors and top-level management (C-roles) are all obligated to report all transactions to the Swedish Supervisory Authority of the financial market FI (Finansinspektionen). Any related party transactions; examples, wife/husband, live-in partner/cohabiter/cohabitant and adults over 18 years of age who have lived together and thereafter during the upcoming 6 months are liable for reporting all transactions to their related party. The Company shall also maintain a list of all persons discharging managerial responsibilities and persons closely associated to them, closeness defined as both practical proximity (shared household, family relations etc.) and legal proximity (shared business ventures etc.) A person discharging managerial responsibilities is defined as:

- A person at the Company who is a member of the administrative, executive, or governing entity, or
- Another person in upper management with regular access to inside information, authorised to make executive decisions or affect the management or Board of Directors.

Persons discharging managerial responsibilities and persons closely associated to them according to rules and regulations to the Market Abuse and Rules/Obligations shall report to the CEO or/(any equivalent person) all changes in share ownership as it pertains to the Company no later than three (3) business days after the transaction, of the matter the transactions value of €5000/annum. The CEO is responsible for keeping an electronic ledger with all transactions. When the total amount of transactions executed during a calendar year exceeds 5,000 EUR (netting of divestments and acquisitions not allowed) persons discharging managerial responsibilities and persons closely associated to them must also report to the Swedish Financial Supervisory Authority. This shall be done electronically via the Swedish Financial Supervisory Authority's website no later than three (3) business days after the transaction dates. Persons discharging managerial responsibilities are subject to trading prohibition for a period of thirty (30) days prior to the publication of interim financial statements or notes on annual accounts.

## 8.2.7 COMMUNIQUÉ

The Company shall institute every reasonable measure to ensure that all persons included in the insider lists, or in the list of persons in leading positions, are notified in writing about the legal requirements specified under MAR articles 18, and of the sanctions applicable to any illegal disclosure of inside information. The Company shall also ensure that these persons confirm their obligations in writing. Persons in leading positions shall in turn inform related parties in writing about their duties according to MAR article 19.

## 8.3 PUBLICATION PRINCIPLES

As a general rule, all Company events that are of not insignificant importance to the valuation of the Company shares must be immediately published, at the same time, to all target groups. The Board is responsible for making sure that this information policy is fulfilled. The Board delegates to the CEO to handle practical issues in order to fulfil the requirements of the Market Abuse Regulation, and the CEO in turn delegates part of that responsibility to the CFO and/or equivalent person, as previously outlined.



### 8.3.1 DISTRIBUTION

The CEO and CFO and/or equivalent person are jointly responsible for ensuring that inside information in the form of press releases, interim financial reports and annual accounts are made public without delay in a non-discriminatory way. Distribution is made via an established digital news service which ensures that the market can partake of the published information at the same time and without delay. All such information shall be published simultaneously on the Company's website under the heading "Regulatory Press Releases", distinctly separated from other news items made available by the Company.

### 8.3.2 PRESS RELEASES

Press releases and financial reports must provide correct, relevant, reliable, and sufficient information to enable reasonable understanding of the importance and the influence of different factors on the Company's operational and financial performance. All the Company's regulatory press releases shall be published with a clear headline which adequately reflects the actual message and a preamble that serves as an executive summary of the full content. A press release shall be written in a formal and clear language, observing a classic editorial structure where information is disseminated in order of importance, making it possible for news distributors to shorten bit by bit from the end. Furthermore, all press releases shall include the name and contact information of the Certified Adviser, Eminova<sup>2</sup>, as well as the CEO and Investor Relations (IR).<sup>3</sup>

Regulatory press releases and communiqués shall be written in Swedish. When deemed relevant the Company may translate part of the press release to English and post it as a news item on the website, where regulatory press releases are clearly separated from news items. If needed and economically justified, a full translation will be made available in English through a news service, in such case the Swedish version shall always prevail.

The CEO is responsible for collecting and distributing press releases. All press releases, regardless of content, shall be approved by the CEO and/or equivalent person before being sent out. The responsibility for producing and publishing press releases rests with the Company's executive leadership.

### 8.3.3 LABELLING PRESS RELEASES WITH INSIDE INFORMATION

Press releases including inside information shall be labelled as such. This is done using a standard label at the bottom of the press release, containing the following information (in Swedish):

*Denna information är sådan information som Gaming Corps AB (publ) är skyldigt att offentliggöra enligt EU:s marknadsmissbruksförordning 596/2014. Informationen lämnades, genom ovanstående kontaktpersons försorg, för offentliggörande vid den tidpunkt som är angiven av Gaming Corps nyhetsdistributör MFN vid publiceringen*

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<sup>2</sup> The Company's Certified Adviser is Eminova Fondkommission AB. Email: [info@eminova.se](mailto:info@eminova.se), phone: +46 8 684 211 00, website: [www.eminova.se](http://www.eminova.se)

<sup>3</sup> The press release shall contain name and email addresses to the CEO and IR as well as the Company website.

*av detta pressmeddelande.*

#### **8.3.4 INTERIM FINANCIAL REPORTS**

Interim financial reports and notes on annual accounts shall be prepared by the CFO, produced by the CEO and/or equivalent person and approved by the Board of Directors prior to being communicated according to the Company's financial calendar. Accounting procedures adhere to the K3 standard. Interim financial reports and notes on annual accounts shall be published in Swedish and in accordance with the regulations of Nasdaq First North.

#### **8.3.5 ANNUAL FINANCIAL STATEMENT AND ANNUAL REPORT**

The CFO is ultimately responsible for the preparation of the annual financial statement, the annual report and other financial information. The CEO is responsible for the business section. The annual financial statement must be approved by the Board of Directors. The CEO is responsible for the assembly of the annual report and making sure it meets high standards in terms of communication, making it highly accessible to the Company's key stakeholders. The statement shall be published in its entirety in Swedish and made public on the Company's website. Printed copies of the annual financial statement shall be distributed to shareholders upon request at the Annual/or Extra General Meetings and also at the Company's website according to the rules and regulations to Nasdaq First North Sweden.

#### **8.3.6 COMPANY WEBSITE**

According to the regulations of Nasdaq First North, regulatory press releases and reports shall be uploaded to the Company website as soon as possible following publication. All information given to the stock market shall be made available on the website for a period of at least five (5) years.

All financial reporting dates and the Annual General Meeting (AGM) date shall be published and updated 1<sup>st</sup> of January each year and also include the date for Q4 even if the date takes place the year after.

All press releases pertaining to the capital market shall be uploaded to the website regardless of whether they are subject to disclosure requirements or not.

The CFO is responsible for ensuring that press releases, interim financial reports, notes on annual accounts, annual financial statements and articles of incorporation are uploaded to the website. The CEO and/or equivalent person is responsible for ensuring that the website always contains up to date information on shareholders' meetings, primary owners, board members, management team members, financial calendar, nominations committee, information and communication policy and relevant contact information.

#### **8.3.7 CAPITAL MARKET MEETUPS, ANALYST, AND INVESTOR MEETINGS**

Any capital markets meetups for analysts, investors and media shall be organized by the Chairman of the Board. When possible, analyst and investor meetings shall be organized in



connection with the publication of interim financial reports as well as upon request by the market. The Chairman of the Board shall ordinarily participate in these meetings. No meetings shall be arranged during a so-called "silent period", see below.

The information given out at meetings with capital market actors shall be based on published financial reports as well as general information about the Company's and the industry's development. Presented material may not contain new information which might affect the valuation of the Company. If, by mistake, any forward looking statements (Disclaimer) is divulged in connection with a meeting with capital market actors, for example during a response to an unexpected question, a press release must immediately be published.

### **8.3.8 ANNUAL GENERAL MEETING AND EXTRAORDINARY GENERAL MEETINGS**

The AGM and any EGM represent the Company's highest decision-making authority, where the owners together decide on important issues for the Company. A notice of the date of the shareholders meeting shall be distributed well in advance according to rules. With regards to the AGM, this means no later than in connection with the publication of the Q3 report; for any EGM this means preferably six (6) but no later than four (4) weeks prior to the meeting within mail and domestic. The complete notices of all shareholders meetings shall be made public in a press release. The CFO and/or the CEO is responsible for the distribution of notices of AGM and EGM according to the above, as well as for all additional planning and execution pertaining to shareholders meetings.

### **8.3.9 INFORMATION FOR EMPLOYEES**

In-between interim financial reports, information given to employees about the financial situation may only pertain to smaller units. Information about the Company's aggregated results shall be given to all employees in connection with the publication of the interim financial report. Employees with access to unpublished information relevant to the capital market shall be regularly reminded of the importance of keeping this information contained in accordance with applicable laws for persons with disclosure obligations. New recruits shall immediately be given access to this information policy and be informed about the importance of confidentiality. Before any employee, contractor working close to the company would like to purchase or sell shares of **Gaming Corps AB(Publ) ISIN:SE0014694691 Ticker: GCOR** the CEO/CFO or any person(C-Level, Team lead or equivalent) in charge of the specific department where the employee or contractor works needs to give the go-ahead before executing any trade.

For all C-Level employees or contractors section 8.2.6 applies regarding duties to inform Swedish Financial Supervisory Authority for each purchase or sell trade executed by the person.

## **8.4 SILENT PERIOD**

The Company may decide on a silent period regarding business-related news and/or comments about the Company's financial situation before the publication of a financial report, annual or interim. In such a case, the decision must be published in a press release.



## 8.5 POLICY REGARDING SELECTIVE INFORMATION

The regulations of Nasdaq First North have a general prohibition against selective information. Information that is not intended to have a significant impact on the valuation of the Company shares should always be disclosed publicly unless an extraordinary situation arises.

Exceptions could be made for unpublished information which may influence Company shares to be given to outsiders (so-called "selective information") without at the same time being published, such as for instance:

- Information for major or potential shareholders during the sounding phase of a scheduled issue of new shares
- Information for advisers hired by the Company to carry out, among other things, prospective work prior to scheduled issuances or other major deals
- Information for prospective bidder or target company in connection with buyout negotiations
- Information requested by a so-called rating institution prior to a credit review, or
- Information about investment plans and expected profitability development prior to major credit decisions.

Exceptions shall only be granted on rare occasions and only to those who make a continuous assessment of whether the requested information is necessary for the purpose. The disclosure of selective information shall be handled in the same way as postponed publications and is thus subject to the rules specified under section 8.1.1 above. Any information given selectively should ordinarily be made public at a later stage in order to terminate the insider position taken up by the person who received the information in the first place.

The Company shall make clear to the recipient of the information that the information is confidential and that the recipient by receiving such information becomes an "insider", thus being prohibited by law to use it for their own or anyone else's personal gain. The Company shall also keep meticulous notes about who has been given access to selective information, when such information was disclosed and for what purpose in an event-based log book.

## 8.6 INFORMATION LEAKAGE AND RUMOURS

The CEO is responsible for monitoring information leaks and events that may lead to information leaks. The CEO or equivalent person is responsible for monitoring statements made about the Company in the press, online and in social media. The Company's general policy is to never comment on rumours or information of a similar nature.

If the Company becomes aware that inside information may have been leaked to outsiders and finds itself unable to make a public statement on the matter, Nasdaq's issuers surveillance department and the Certified Adviser must be contacted immediately. If the circumstances upon which the leaked information rests can be made public, this shall be done as soon as possible. A "leakage message" ought to have been prepared in order to enable the quick handling of any situation requiring an immediate response.

### 8.6.1 EXTERNAL FORECASTS

The Company does not ordinarily give out profit forecasts. If forecasts are made by external sources, such as analysts and journalists, and these forecasts are highly unrealistic and/or based on fundamental errors, the Company shall endeavour to ensure that the market is not misinformed regarding previously published



financial reports etc. In more serious cases, the Company should publish a correction in the form of a press release. In less serious cases, the correction can be included in the following report.

## 8.7 CRISIS COMMUNICATION

In the event of a crisis or when facing significant negative publicity, the Board of Directors take on the role of a crisis management group, with the Chairman of the Board calling the meetings. In any such case, the Board shall handle the publication of information, if deemed relevant with the aid of the management team and must always consult Nasdaq and the Certified Adviser.

## 8.8 INFORMATION SECURITY

The Company applies specific safety procedures and measures for the management of cases and information containing inside information, which are particularly sensitive. These measures and procedures contain, depending on what is most appropriate in the specific situation:

- The use of specific code words in order to denominate the case and the parties concerned.
- to not discuss the case with persons outside the group of persons who have been listed in the relevant section of the insider list and under all circumstances (to the extent possible without revealing any sensitive information) do so only in general terms and in anonymous forms.
- to hold discussions, telephone conferences etc. behind closed doors or otherwise, so that no uninitiated can perceive the discussion.
- to ensure that case-related documents promptly are retrieved from the printer.
- to not leave documents in the copier machine or common areas.
- to not in general leave sensitive documents visible at the office and at other places.
- to ensure that electronically stored documents have adequate access and restrictions.
- to be particularly careful when sending emails in order to minimize the risk of an inadvertent disclosure of sensitive information.

Furthermore, the management of the inside information must always be in accordance with information security rules and policies applicable at that time in the Company. It should be notified that the Company's employees, consultants, and advisers shall be subject to contractual and statutory obligations of confidentiality.

Gaming Corps as a group has been working to meet the requirements of ISO27001 since Q2 2022, and are at the last stages to finalize the certification process.

## Board of Directors

**Claes Tellman**, CHAIRMAN OF THE BOARD

**Bülent Balıkcı**, MEMBER OF THE BOARD

**Daniel Redén**, MEMBER OF THE BOARD

**Thomas Hedlund**, MEMBER OF THE BOARD