

Communication and information policy

This Communication Policy states the guidelines for all internal and external communication in Gróska ehf. (“Gróska”). The purpose of the Policy is to clarify how responsibility is shared and to contribute to uniform communication, both within Gróska and to Parties outside Gróska.

Main principles

- All events that trigger disclosure requirements for Gróska’s financial instruments shall be communicated as soon as possible.
- Information to employees shall be given only after fulfilling disclosure obligations.
- Communication shall always be fast, open, objective, well-structured and well planned.
- Public disclosure shall be made through publication of press releases that are sent simultaneously to Nasdaq Iceland and the Icelandic Financial Supervisory Authority, established news agencies and daily newspapers. The same information should also be published simultaneously on Gróska’s website.

Responsibility and spokespersons

The Board is represented by the Chairman. Any media contacts with individual Board members concerning Gróska must be endorsed by the Chairman and agreed with the Managing Director (*isl. Framkvæmdastjóri*).

The Managing Director is the overall and primary spokesperson for Gróska but may delegate operational responsibility further, depending on the issue and occasion. The secondary spokesperson for Gróska is the Chairman. The Managing Director is the main decision-maker on matters concerning Gróska communication. The Chairman of the Board of Directors is the spokesperson on ownership issues but can delegate that role to the Managing Director. If the Managing Director is not available, for any reason, the responsibility according to this policy may be temporarily delegated to the Chairman. Other spokespersons may be designated from time to time, depending on the type of matter to be communicated.

Internal communication

The purpose of internal communication is to provide employees with information about Gróska’s vision, strategy, operations, financial results and commercial offering, and how the vision will be realised. Our principle is to distribute information internally on a need-to-know basis. Internal information is the responsibility of the Managing Director.

External communication

External communication relates to communication aimed at one or more target groups outside Gróska, such as the media, customers, authorities, and the public. The purpose of Gróska external communication is to support it in achieving its overall vision by developing and maintaining good relationships with key stakeholders and by increasing knowledge and awareness about Gróska and its operations.



Investor Relations

All events that trigger disclosure requirements for Gróska's financial instruments shall be communicated as soon as possible. The Managing Director has primary responsibility for relations with the capital market. The Managing Director's responsibility may be delegated to the Chairman,

Press releases and financial reports

A press release and/ or financial reports must meet applicable requirements. Background material and fact sheets shall be concise, factual and concrete. Press releases can be divided into two categories, on the one hand there are general press releases not containing insider information but newsworthy information from Gróska operations, such as new products and services, and on the other hand press releases containing insider information. The other category is press releases containing price sensitive information and is considered to contain inside information.

All press releases containing inside information shall be approved by the Managing Director. In the event for any reason the Managing Director is not available, this policy may be temporarily delegated to the Chairman.

Financial reports are produced and published bi-annually. The publication date of annual financial information shall not be later than four months after the end of the reporting period and no later than two months after the end of the reporting period for interim information. The Board has the ultimate responsibility for information given in interim financial reports (including year-end reports) and annual reports.

Gróska does not participate in or take the initiative to arrange individual meetings with the media, analysts or investors during a 14-day period prior to the publication of a financial report, including the date of publication. An exception to this rule is the publication of press releases about Gróska events, which require a Gróska representative to be available to answer questions. Comments on the forthcoming financial report shall be avoided during such communication.

Type of communication	Primary Spokesperson	Secondary spokesperson
Internal communication	Managing Director	Chairman of the Board
Investor relations	Managing Director	Chairman of the Board
Media	Managing Director	Chairman of the Board
Market communication	Managing Director	Chairman of the Board
Crisis communication	Managing Director	Chairman of the Board
Ownership	Chairman of the Board	Managing Director