

 sivers SEMICONDUCTORS	Document Type:	Document Number:	
Document Title: INFORMATION POLICY		Rev. 1.0	Page: 1 av 16
Prepared by:	Reviewed by:	Date: 2022-05-19	Sivers Semiconductors AB

INFORMATION POLICY

FOR

SIVERS SEMICONDUCTORS AB

INTRODUCTION

Communication is a presumption for creating credible and strong relations. Employees within Siverts Semiconductors AB (the "**Company**") must always reflect upon how the Company is perceived by others and which values the Company wants its trademark to be associated with.

Communication should be a natural aspect in the business of the Company – and be controlled and used purposefully to run the Company forward. By working actively with the internal communication, the Company creates not just a team spirit but also motivated and dedicated co-workers.

The external communication is about strengthening the trademark and creating economic growth. The Company's communication should be characterized by quickness, openness and factualness – but also be structured and well-planned. The Company's shares are admitted to trading on Nasdaq Stockholm (the "**Exchange**"). The Company shall comply with Nasdaq's rule book for issuers, as well as statutory laws and regulations that applies to the Company. All information that may have an effect on the price or value of the Company's financial instruments has to be communicated in a responsible way and in compliance with the regulations and guidelines that applies to the Company.

The image of the Company that is conveyed must be correct and the communication activities must be as efficient as possible, thus the Company's communication must be consistent throughout the organization. CEO has the overall responsibility for the communication of the Company, but all employees have a responsibility to make sure that the communication has the highest possible quality. In this policy the Company has gathered tools and guidelines regarding how the employees of the Company should act regarding communication in the daily work as well as in case of sudden events.

This information policy was adopted on 2025-05-28 by the Board of Directors in the Company and was distributed to every employee in the Company.

For the information policy to be efficient it's fundamental that the Company continuously updates this document.

Bami Bastani, Chairman of the Board of Directors

Kista, Sweden 2025-06-16

The Board of Directors

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1 COMMUNICATION

The communication by the Company must be of long term and in accordance with the vision, business concept, strategies and objectives of the Company. The communication must be quick, open, factual, well-structured and well-planned, in good times and in bad times. To create a clear image of the Company all communication must be based on the same message and be communicated by a few spokespersons – in accordance with this policy.

The Company shall ensure that all inside information is made public in a manner which enables fast access for the public and a complete, correct and timely assessment of the information. Disclosure of inside information shall not be combined with marketing or other information.

Information disclosed by the Company shall be correct, relevant, clear and shall not be misleading. The information shall also be detailed enough to enable an assessment of the information's importance for the Company and for the Company's financial instruments. The essential information shall be presented in the beginning of the press release and the press release shall always include a headline that summarizes the information presented in the press release.

2 COMMUNICATION ACTIVITIES

2.1 General

Through its communication the Company intends to:

- Inform the public about significant events, especially those that constitute inside information,
- continuously inform the public about the financial position of the Company,
- create interest for the business and build a confidence for the business,
- create opportunities for an increased dialogue with external parties, and
- involve and engage the employees.

The communication of the Company is divided into two separate fields:

- external communication, and
- internal communication.

2.2 Tools for communication

The Company's tools for external communication is amongst others:

- Press releases,
- interim reports and year-end reports,
- annual reports,
- the Company's website,
- electronic and printed information-, advertisement- and presentation material,
- answers on questions per telephone, email or fax, and
- contacts with analysts.

This policy covers all external communication, including websites, press releases and financial reports as well as oral information in meetings or calls with analysts and investors, interviews with the media etc.

The Company's basic principle is to communicate in Swedish and English.

2.3 Responsibility

The CEO is ultimately responsible for the Company's communication with the market, public and media. As information activities are fundamental for the Company, the CEO has an overall responsibility for the Company's external and internal information as well as for the Company's overall relation with the media. The CEO is responsible for the content on the Company's website. The CEO is available for contact during the Exchange's opening hours.

Only the CEO or by the CEO appointed person has the authority to make statements about any questions that concerns the Company in general, both externally and internally.

2.4 Spokesperson

The official spokesperson for the Company is the CEO or the person appointed by him/her. In case that the CEO or the person appointed by him/her cannot be reached, the Company's CFO is the deputy spokesperson. The Chairman of the Board is the Company's spokesperson regarding the Company's Board of Directors and owners.

Only the CEO, the CFO and by him or her appointed person shall communicate with the financial market and media on behalf of the Company. Others that are contacted by investors, shareholders, analysts or media shall always, without further comments, refer directly to the CEO, who will refer to the relevant spokesperson.

Contact details to the official spokesperson:

Vickram Vathulya, CEO

Tel: +1 (408) 594-9828

Email: vickram.vathulya@sivers-semiconductors.com

2.5 Investor relations

The CEO is responsible for investor relations and for:

- the overall coordination of the Company's investor relations,
- supplying the Company's target groups with financial and other relevant information,
- drawing up and distributing press releases,
- coordinating the activities of the Company targeting the financial market and shareholders,
- maintaining and developing the Company's website, and
- the compilation of annual reports and interim reports.

3 QUIET PERIOD

The Company has a quiet 30 days period before publishing interim reports and annual reports. During this period the Company's representatives shall not meet with analysts, investors or the financial media. Media and analysts are to be treated equally. Exceptions from the quiet period can be made for general presentations by the Company at specific events that are significant for the

Company to participate in. Exceptions may also be made if, for any other reason, the Company considers that it is significant for the Company that the information is communicated. The CEO has the overall responsibility for making any decisions pursuant to this section 3.

The Company may further deviate from what is stated regarding the quiet period in this policy in case the Company, by law, Nasdaq's rule book for issuers, generally accepted practice in the Swedish securities market or by any other regulations, are obligated to disclose certain information.

4 DISCLOSURE RULES

A prerequisite to enable an independent analysis of the Company's business and value is that all stakeholders are given access to the same information about the Company at the same time. The Market Abuse Regulation and Nasdaq's rule book for issuers stipulate that the Company shall disclose inside information as soon as possible in accordance with article 17 in the Market Abuse Regulation. This means that an announcement shall not take longer than what is necessary in order to compile and distribute the information, regardless of whether it is during the Exchange's trading hours or not. This requires good planning, i.e. that a press release is drafted prior a decision (the provision does however not mean that the information must be disclosed during an ongoing Board meeting). Please note that information may however be deemed as inside information before a decision is made. It is necessary to continuously monitor whether inside information is present already at an intermediate stage, and thus also whether disclosure is necessary. Events beyond the Company's control may also be required to be disclosed as soon as possible.

4.1 Inside information

The Company has adopted an Insider Policy and Insider Instructions (Appendix B of the Insider Policy) in order to thoroughly comply with applicable laws and regulations.

Nasdaq's rulebook for issuers and other relevant rules and regulations applicable on the Company stipulates in what situations, and in what manner, information shall be disclosed. For the purposes of this policy "inside information" shall have the same definition as under the Market Abuse Regulation, i.e.: information of a precise nature which has not been made public, relating, directly or indirectly, to the Company or to financial instruments issued by the Company, and which, if it were made public, would be likely to have a significant effect on the price of those financial instruments or on the price of related derivative financial instruments.

Information shall be deemed to be of a precise nature if it indicates a set of circumstances which exists or which may reasonably be expected to come into existence, or an event which has occurred, or which may reasonably be expected to occur. Furthermore, the information shall be specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices (e.g. the stock exchange rate) of the financial instruments or the related derivative financial instrument. In this respect in the case of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may

be deemed to be precise information. An intermediate step in a protracted process shall be deemed to be inside information if, by itself, it satisfies the criteria of inside information as referred above.

The information is deemed as likely to have a significant effect on the price if the information is of such nature that a reasonable investor would be likely to use it as part of the basis of his or her investment decisions.

Inside information as referred above, shall be disclosed to the public as soon as possible. However, the disclosure of inside information may be delayed provided that certain conditions are met, see further below.

In situations when inside information may exist, the Company has an obligation to disclose the information. Such situations may be:

- 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;
- financial difficulties;
- decisions taken by authorities;
- shareholder agreements known to the Company which may affect the use of voting rights or transferability of the financial instruments;
- market rumours and information leaks;
- market making agreements;
- information regarding subsidiaries and affiliated companies;
- significant deviation in financial result or financial position; and
- substantial changes to the operations of the Company.

The assessment of what constitutes inside information shall be made on a case-by-case basis. In case of doubt, CEO should contact the Surveillance department of Nasdaq Stockholm for advice (telephone: +46 8 405 60 00).

4.2 Delayed disclosure of inside information

The Company may, in accordance with article 17 in the Market Abuse Regulation, delay a disclosure of inside information at its sole discretion, provided that the following conditions are met:

- a) immediate disclosure is likely to prejudice the legitimate interests of the Company,
- b) delay of disclosure is not likely to mislead the public, and
- c) the Company is able to ensure the confidentiality of that information.

The conditions shall be met during the whole period of the delayed disclosure.

If the Company no longer can ensure that the inside information subject to the delayed disclosure remains confidential, for example in case of a sufficiently clear rumor related to the inside information, the Company shall disclose the information as soon as possible.

It is the CEO who is responsible for deciding if the Company shall delay the disclosure of inside information. In case the CEO is absent, such aforementioned decisions to delay disclosure of inside information may also be taken by CFO.

4.3 Document the decision

If the Company decides to delay the disclosure of inside information, the decision and the reasons for this shall be documented, including information about the person who made the decision and how the three conditions above have been met. The aforementioned obligation to document the delay of disclosure of inside information shall also encompass a duty to draw up an internal list of those persons who have access to inside information in accordance with the Company's Instructions for Insider Lists.

The documentation of decisions to delay disclosure of insider information shall be concluded in writing and contain the following information:

- a) the dates and times when:
 - i. the inside information first existed within the Company;
 - ii. the decision to delay the disclosure of inside information was made;
 - iii. the Company is likely to disclose the inside information;
- b) the identity of the person(s) within the Company responsible for:
 - i. deciding about the start of the delay and its likely end;
 - ii. ensuring the on-going monitoring of the conditions for the delay;
 - iii. deciding about the public disclosure of the inside information;
 - iv. providing the requested information about the delay and, upon request, the written explanation to the competent authority;
- c) evidence of the initial fulfilment of the conditions for delayed disclosure under MAR and of any change of this fulfilment during the delay period, including:
 - i. the information barriers which have been put in place internally to prevent access to inside information by persons other than those who require it for the normal exercise of their employment, profession or duties within the Company, and with regard to third parties;
 - ii. the arrangements put in place in cases where the confidentiality is no longer ensured.

The Company's template for documenting decisions and the reasons for delay of the disclosure of inside information can be found in Appendix B to this Policy. Insider lists shall be kept electronically in InsiderLog.

4.4 Obligation to draw up an insider list and inform the SFSA

The Company shall always draw up an insider list (logbook) of those persons who have access to inside information. Insider lists shall be kept electronically in InsiderLog. The CEO is responsible for ensuring that a new section of the insider list is opened when inside information arises.

All persons with access to inside information about the Company, working either as employees or otherwise (including inter alia Board members, external consultants, and auditors) shall be included in the insider list, irrespective of whether these persons are registered in the Company's list of PDMRs. The Company shall inform the Swedish Financial Supervisory Authority (the "SFSA"), through InsiderLog, that disclosure of the information has been made immediately after the information is disclosed to the public, and, upon request where the Company has delayed the disclosure of inside information, provide a written explanation of how the conditions for the delayed disclosure were met. The Company shall inform the SFSA in accordance with the SFSA's instructions available through the following link:

<https://www.fi.se/en/markets/issuers/inside-information/>

In order to fulfil the Company's obligations as regards archiving, the Company shall, at all times, ensure that the above mentioned documentation is saved for at least five years pursuant to the SFSA's instructions.

Please note that the Company will have to notify the SFSA even if the information has been disclosed in a press release.

4.5 Regular disclosure requirements

Nasdaq's rule book for issuers stipulates some examples of information that always should be disclosed irrespective of whether it constitutes inside information or not. Examples of such information are:

- Financial information,
- Notice to and resolutions from, general meetings of shareholders
- Changes in the Board of Directors, senior management and auditors
- Liquidity enhancement
- Changes in the Share capital or the number of shares
- Share-based incentive programmes
- Decisions regarding admission to trading
- Disclosure considered necessary to provide fair and orderly trading

The Company's financial calendar for the financial year shall always be published on the Company's website before the financial year begins.

4.6 General meetings

Annual General Meetings are held annually within six months after the end of the financial year. The date of the Annual General Meeting shall be published in the year-end report. An Annual General Meeting, as well as to an Extraordinary General Meeting, shall be convened in accordance with the Articles of Association of the Company by means of publishing the notice in the Swedish Official Gazette or/and on the Company's website. At the same time as a general

meeting is convened, the Company shall announce that a general meeting has been convened by means of advertising it in Swedish daily newspaper Svenska Dagbladet. The notice shall also be made public as a press release by the Company.

5 INFORMATION TO THE EXCHANGE

Certain situations require that the Company informs the Exchange prior to disclosure. For example, the Exchange is required to be pre-informed upon announcement of, but not limited to:

- takeover bids, or
- information that is assumed to be of extraordinary importance for the Company and its financial instruments.

At the disclosure of information that is assumed to be of extraordinary importance for the Company and its financial instruments the Exchange may decide to halt the trade in the financial instruments in connection with the disclosure.

In conjunction with substantial changes to the operations of the Company, the Exchange should be contacted in advance.

5.1 Significant deviation in financial result or financial position

If the financial result or position of the Company deviates in a significant way, upwards or downwards, from what could reasonably be expected based on information previously disclosed by the Company, information on such deviation shall be disclosed if it constitutes inside information. In such cases, the information shall be disclosed as soon as possible as a delayed disclosure is likely to mislead the public. If the “unexpected significant deviation in financial result or financial position” is of extraordinary significance for the Company, the Exchange shall be notified in advance.

6 SELECTIVE DISCLOSURE OF INSIDE INFORMATION AND MARKET SOUNDINGS

The Company may, in special cases, need to disclose information to persons who take an active part in the decision process or as a part of their professional role is involved in the information process, before the information is disclosed to the public. All selective disclosure of inside information must be preceded by an assessment and documentation regarding the conditions for delayed disclosure, see also section 4.2 above.

Such selective disclosure of inside information requires that it is of great importance for the Company to selectively disclose the information. Such situations may, for example, be at hand in the following situations:

- Information to major shareholders or contemplated shareholders in conjunction with an analysis prior to a planned share issue,
- information to advisors retained by the Company for a planned share issue or major transaction,
- information to lenders prior to significant credit decisions, or
- information to a prospective partner or licensee.

The recipient of such information shall be informed that the information shall be treated as confidential and that the recipient is subject to applicable rules and regulations regarding inside information. The recipient shall be entered in the insider list and confidentiality agreements shall always be entered into in these situations.

In conjunction with the above situations the Company must also pay attention to whether the rules on market soundings in the Market Abuse Regulation should be complied with. For example, the Company shall specifically consider and ascertain whether a market sounding will involve the disclosure of inside information, make a written record of its conclusion and the reasons therefor, and, upon request, provide such written records to the SFSA. The Company shall, before making the disclosure, obtain the consent of the recipient, inform the recipient that he or she is prohibited from using that information, or attempting to use that information, by acquiring or disposing of the Company's shares, or cancelling or amending an order concerning the Company's shares and that the person receiving the market sounding is obliged to keep the information confidential. Furthermore, the Company shall maintain a record of the information disclosed, including the identity of the recipients and how they have been informed of their obligations set out above. The Company shall keep such records for a period of at least five years.

7 ADMINISTRATION OF INFORMATION

The employees of the Company shall comply with the internal confidentiality requirements established to prevent dissemination of inside information. If external consultants and partners receives inside information, confidentiality agreements shall be drawn up.

7.1 Routines

7.1.1 *Distribution*

The CEO with the assistance of Investor Relations is responsible for disclosure of inside information in the form of press releases and interim reports, without delay and in a fair and non-discriminatory way, to the public and in accordance with the Market Abuse Regulation and other rules and regulations applicable to the Company. For distribution, an established electronic news distributor shall be used, which ensures that the Exchange, the media and the public can simultaneously access published information without delay.

7.1.2 *Press releases*

The information disclosed in press releases shall be categorized as either regulatory or non-regulatory. The CFO shall review press releases of regulatory or financial relevance. Press releases containing insider information shall under no circumstances contain any other information than insider information. All press releases must contain a heading that clearly indicates the content of the press release in question.

All press releases shall clearly indicate whether the information disclosed is regulatory or non-regulatory and indicate what kind of information the release contains (for example interim report, inside information, information regarding a share issue or similar). Further, all press releases shall also state the date and time of the disclosure, and by whom the information was disclosed.

Regulatory press releases are all press releases that include information that the Company is obliged to publish. Regulatory press releases shall specify the regulatory framework under which the Company is obligated to publish the information. The Company is obliged to publish information according to the Market Abuse Regulation, the Securities Markets Act (SFS 2007:528), the Swedish Market Abuse Act (2016:1307) and the Swedish Act complementing the EU's Market Abuse Regulation (2016:1306) and the Financial Instruments Trading Act (SFS 1991:980). It must be noted that press releases containing inside information shall, at all times, include a reference to the Market Abuse Regulation.

Furthermore, press releases shall contain information about the Company's website, contact person and telephone number. Appendix A contains the different legends that shall be used in the Company's press releases.

Press releases shall be submitted to the members of the Board of Directors in connection with the publication.

7.1.3 *The Company's websites*

CEO with the assistance of Investor Relations is responsible for all of the Company's official websites. The Company has a website for the publication of information in accordance with this policy, the Exchange's requirements and the Swedish Corporate Governance Code. Press releases, financial reports, information from general meetings, the articles of association and information regarding the Company's Board of Directors and management shall be available on the Company's website. Contact information shall also be available on the website. All disclosed information from the Company to the stock market shall be available on the Company's website for at least five years.

CEO with the assistance of Investor Relations is responsible for keeping the website up to date.

Please note that regulatory information that the Company is obliged to disclose pursuant to applicable rules and regulations shall be made public by means of a press release prior to being published on the Company's website.

7.1.4 *Contact with analysts*

The Company may under no circumstances disclose any inside information to analysts. However, in the case of analyst contacts, non-public information may be provided if it does not constitute inside information. Thus, information can be provided selectively. For example, it is allowed to:

- "put flesh" to previously provided information,
- remind of previously provided information,
- correct misunderstandings, counting errors and obvious logical errors, and
- provide industry statistics.

Furthermore, it is permitted to submit inside information at an analyst meeting – whether it is a regular meeting or a conference call – if the Company disclose the inside information by a press release before or at least at the same time. Should inside information be submitted by mistake in such a meeting, for example as an answer to a question, a press release shall be published immediately.

Furthermore, in the Company's contacts with analysts and media, the following shall be considered:

- If an analyst receives certain information, the Company cannot deny another analyst or journalist the same information. It should be included in the Company's assessment of whether the information may be disclosed.
- The Company should be prepared to provide the same information to the media.
- It is strictly forbidden to provide analysts or journalists information regarding upcoming news, even though they promise not to publish it before the disclosure. The Company shall always invite media to conferences with analysts to reduce the risk of such meetings being suspected.
- Analysts shall be treated fairly and be provided access to the same information, whether they represent a small or large owner or an analyst firm.

Some companies distribute analyst reports. To avoid the risk that the Company will sanction what is stated in an analyst report and thus make a selective disclosure of inside information, the Company shall instead refer to the respective analyst firms. Further, the Company shall mention the name of the analyst (after permission from the person concerned) in the Company's annual report and on the Company's website.

Regarding meetings with individual contacts from the public and the media or with individual analysts ("one-to-one meetings") documentation such as invitation, printed material and attendance lists from these meetings shall be archived. In some cases, a memorandum with names of the persons who have been provided information should be drawn up and archived.

It should be noted that some of the actions referred to above may result in that the stricter requirements under laws and regulations regarding market sounding may become applicable.

7.2 Information leaks and crisis

To reduce the risk of information leaks, the Company has a policy that:

- The senior management shall inform all employees who may have access to non-public inside information at least once a year about the rules and regulations applicable to such information.
- When negotiating business acquisitions or divestments no more persons than necessary shall be informed. These persons shall enter into a confidentiality agreement unless otherwise regulated under the employment agreement.

7.2.1 *Inside information leaks and rumours*

If there is a leakage of inside information before a planned disclosure, the Company shall as soon as possible make the information public and immediately notify the Exchange. The Company shall always inform about the actual circumstances.

In case of rumours, the Company shall consistently and always apply: "The Company has a policy not to comment on rumours." Under no circumstances may the Company use the term "no comments" which can be interpreted as a confirmation of the rumour. If the rumour is harmful to the Company, the Company should make public a clarification through a press release.

When preparing for important decisions and decisions regarding delay of disclosure of inside information, a press release in case of information leakage shall always be prepared.

7.2.2 *Crisis management*

All communication activities within the Company shall be in line with this policy. However, in special situations, such as crisis or leakage, all communications should be strictly centralized and led by CEO or, if the issue concerns the CEO, by the Chairman of the Board of Directors or the CFO.

In a crisis situation, the objective is to minimize negative effects on the Company's reputation and brand. The Company should act as if a worst case scenario has occurred since it is better to, at an early stage, immediately take sufficient measures than to afterwards find out that the measures taken were too late or too small.

In a potential crisis situation, the appointed crisis team, consisting of the CEO, the CFO and Investor Relations should be convened, and the chairman of the Board of Directors should be immediately alerted. The crisis team is responsible for decisions regarding issuance of statement, spokesperson and any further actions.

The EU Market Abuse Regulation, applicable laws and regulations as well as the Nasdaq Rule Book, including guidelines and recommendations issued by Nasdaq Stockholm, shall always be considered and complied with in respect of crisis management, meaning that it is important to analyse actions that are being considered in a crisis situation in light of the rules regarding distribution of inside information.

7.3 Internal communication and information within the Company

All internal information within the Company must be compliant with Nasdaq's rule book for issuers, the Market Abuse Regulation and other applicable laws and regulations. This may lead to some restrictions regarding the internal information within the Company. Furthermore, it shall be noted that due to, inter alia, competition reasons, the Company's ability to disclose and distribute information to the Company's employees is limited.

7.3.1 *Objective of the Company's internal communication and information*

By developing the internal communication and information the Company aims to raise the employees' knowledge and give them the opportunity to give their views on the business.

Satisfactory internal communication improves the Company's ability to achieve its goals. It is fundamental to increase the communication across the organisation and between the units within the organisation. To develop functional internal communication and information systems is a process where the senior management are important predecessors and role models. However, it is always the individual employee's obligation to keep himself/herself actively informed enough to handle his/her duties.

Efficient internal communication and information:

- creates consensus on goals,
- gives employees an overview,

- provides better basis for decision making,
- creates participation in decision making,
- creates motivation,
- facilitates delegation,
- contributes to personal development, and
- raises efficiency.

8 OTHER CONSIDERATIONS

8.1 Press and Media

In order to send coherent and correct messages to the media and press all questions from journalists shall immediately be directed to the CEO. In case a journalist contacts a representative of the Company, the standard operating procedure shall be:

- not to answer the journalist's questions immediately,
- but instead, ask politely for the journalist's contact details and let him/her know that you will get back to him/her as soon as possible, and
- consult CEO.

8.2 Social media

Social media, such as Facebook and Twitter, have emerged as an effective method for quick and efficient communication with large and varied audiences. These advantages, however, pose a certain risk if social media is misused or abused. This policy outlines a governance framework for the official use of social media on behalf of the Company.

When considering the Company's use of social media, the EU Market Abuse Regulation, applicable laws and regulations as well as the Nasdaq Stockholm Rule Book, including guidelines and recommendations issued by Nasdaq Stockholm, shall always be considered and complied with, e.g. to ensure that no inside information is distributed selectively and to control the information flow in general. More specifically, the principles below shall be considered and complied with.

All posting to a social media account on behalf of the Company must be consistent with the following guidelines:

- only individuals approved by the CEO are allowed to post information and only in accordance with a scope approved by the CEO prior to posting;
- no opinion and speculation shall be expressed;
- posting should not violate any rules in the information policy;
- never post confidential or inside information; and
- act responsibly and think twice before posting. Information posted to the web, even when removed, may have already been preserved by others and could be reposted.

8.3 Capital market days and press and analyst meetings, etc.

Press and analyst meetings as well as capital market days may be held on suitable occasions in order to provide information on a certain topic or improve the understanding of the investment case in general.

The CEO is, in consultation with the CFO and Investor Relations, responsible for activities of this kind.

The EU Market Abuse Regulation, applicable laws and regulations as well as the Nasdaq Rule Book, including guidelines and recommendations issued by Nasdaq Stockholm, shall always be considered and complied with. The provision that all market participants shall have simultaneous access to inside information about the Company is of particular importance in this regard, i.e. processes should be implemented to ensure that inside information is not published selectively and prior to being announced. Adequate processes shall be evaluated for each specific event but as a standard operating procedure, all scripts and other relevant material for such press and analyst meetings and capital market days shall always be approved by the CEO, in consultation with the CFO and Investor Relations, in advance.

9 CONSULTATION AND CAUTION

If you as an employee or contractor in the Company in any manner are uncertain how to act in accordance with this policy, you must consult the Company's CEO or the person who whom points out. The discussion is confidential. If the situation is difficult to interpret (for example, if it is difficult to assess if certain information is likely to have a significant impact on the price or just an impact on the price) then please favour the more careful approach.

Contact information

Vickram Vathulya, CEO

[Tel:+1 \(408\) 594-9828](tel:+14085949828)

Email: vickram.vathulya@sivers-semiconductors.com

10 APPENDICES

[Appendix A](#) – Company's press release legends.

[Appendix B](#) – Delayed Disclosure