

# RIDERCAM AB

## insider policy

Approved by the Board of Ridercam AB (Publ)

### 1st Generally

a) Ridercam AB ("Issuer") is a public company whose shares are traded on a Swedish trading venue in Sweden ("trading place"). The issuer shall follow the rules that apply on the market place, and other applicable laws and regulations applicable to public limited companies in Sweden. This policy aims to ensure a good quality of both internal and external information, and to ensure that both laws, rules and agreements are followed. In addition, it aims to ensure that the Issuer maintains a high ethical standards and To prevent any kind of improper or unauthorized trading in its securities.

b) Issuer's policy of communication and information is designed to ensure that the issuer has a good quality in these respects. The policy affects all employees in the issuer and can be summarized as below;

- in) Issuer's communications must be correct, relevant and clear.
- ii) It should be easy to find and obtain information about the Issuer for both employees and external stakeholders, as well as to other interested parties.
- iii) A guideline for the Issuer is that all information should be of high quality and that it may never be ambiguous or misleading. Difficulties and problems will be thoroughly illuminated with the measures taken to solve them. It is important that the person acting as Information Manager is available on request. The communication of the issuer shall be Swedish and English.

### 2nd Application

The policy covers all external communications, including both the website, press releases and financial reports and verbal information at meetings / calls with analysts and investors, interviews with the media, etc.

### 3rd Tools for Communication

- Website.
- Press releases.
- Interim reports.
- Year-end reports.
- Annual reports.
- The prospectus or information memorandum.
- Printed information.
- Electronic presentation materials.
- Answers to inquiries by telephone, e-mail and fax.
- Analysts and personal contacts.

#### 4th Responsibility

- a) Communication activities are an important instrument and thus the responsibility of the management. Issuer CEO is ultimately responsible for when, how and what information may be disseminated by anyone in the organization.
- b) Communication Responsibility is shared between the President and the Board. The main principle is that the person is best suited to answer a question also will be responsible to do so can apply. Generally:
  - in) Issuer CEO spokesman of company-wide issues, such as economic status, business strategies, market and competitive assessments - in short, all the information. In the President's absence The issuer is responsible CFO External Communications. Other people should not comment other than in general terms and then about facts and circumstances that are already widely known.
  - ii) Ownership issues are referred to the Chairman.
- c) The subsidiaries are responsible for informing the customers, the market and the public as long as the information is not considered to affect the Issuer.
- d) Issuer's CEO has responsibility for all decisions and actions related to the decision on when inside information exists, public disclosure of such information and bringing the Issuer's insider list, and that people in positions informed.

#### 5th Disclosure requirements

- a) The market abuse regulation defines inside information. By definition it can be seen that inside information generally is information of a precise nature which has not been published, directly or Issuer or indirectly to the security and which, if made public, would likely have a significant effect on the price of the securities. Information that if made public "would likely have a significant effect on the price "on the security information that is considered reasonable investors likely would use as part of the basis of his investment decisions. For processes that take place over time can also intermediate step is considered to be inside information.
- b) The assessment of what is inside information must be based on facts and circumstances and made from case. If in doubt should first issuer to contact the Issuer Certified Adviser for advice. The basic rule is based, however, from that information that, if made public, would be likely to have a significant impact on the price of the Issuer's financial instruments. It is not necessary that there is a real change of price.
- c) The issuer shall ensure that all stakeholders in the stock market have simultaneous access to inside information concerning the Issuer. The issuer must therefore ensure that the inside information confidential before the public and that no unauthorized party gets access to such information. It follows that the new inside information may not be disclosed to analysts, journalists or other either individually or in groups on the not simultaneously published.
- d) In special cases where the information given in the normal course of employment, business or obligation and the person receiving the information owes a duty not to disclose it can, however, provide information before the publication of such individuals who are actively involved in the decision or the result of their professional role takes part in efforts to develop the information. It may, for example concern information to major shareholders or prospective shareholders at 3 probing for the planned rights issue, adviser to the Issuer makes use of for example, Prospect of work ahead of a planned share issue or other larger scale, to prospective bidders or target companies in connection with negotiations on takeover offer to rating agencies for credit rating or the lenders prior to significant credit decisions.
- e) The issuer can not escape its obligation to disclose inside information by entering into a contract with another party to the effect that certain information, or details of such information may not published by the Issuer. The issuer should never enter into such agreements.
- f) The information Issuer leave should be accurate, relevant, clear and not misleading. In addition, it may be sufficient, that is, it must not disclose anything that could affect the assessment of

Issuer.

g) To meet such a fair distribution of the information as possible as inside information must be communicated market during trading, the Certified Adviser contacted in advance by the company's CEO. According to Trading venue rules are informed that a not insignificant extent are likely to affect the valuation of The company's shares can not be otherwise than through publication. For example, there is information required in following situations:

- in) orders and investment decisions,
- ii) partnership or other material agreements;
- iii) purchase and sale of companies,
- iv) price or currency fluctuations,
- v) credit or customer losses,
- we) new "joint ventures"
- vii) research, development of new products or important inventions,
- viii) initiation or settlement of legal disputes and relevant court decisions,
- inx) financial difficulties,
- x) authority decision
- xi) shareholder agreement is known to the issuer and which may affect the transferability of the Issuer financial instruments, shares,
- xii) market rumors and information leaks,
- xiii) "Market maker" agreement,
- xiv) information regarding subsidiaries and affiliated companies, and
- xv) material change in the financial position, and
- xvi) fundamental changes in the Issuer's operations.

hrs) Trading venue rules means that certain operating information is required to publish, this is true:

- in) Year-end
- ii) Interim reports.
- iii) Notice of General Meeting.
- iv) Information about the report is available.
- v) Notice to attend and decisions of the General Meeting.
- we) Changes in the Board of Directors and change of senior management, as well as replacement of the Certified Adviser.
- vii) audit Report
- viii) Related party transactions

in) If the Issuer observes that its earnings performance during a quarter to differ materially, up or down, from the image of the Issuer's situation created by previously disclosed information, this should be public. In cases where the unexpected significant change in result are likely to have significant price sensitive effect will the Certified Adviser and trading place notified in advance.

#### 6th Deferment of publication

a) The issuer may choose to use its right to postpone the publication with MAR 596/2014. For To do that the Issuer shall ensure that the following conditions are met, as well as writing and detail document how and in what way the conditions are met:

- in) The disclosure could damage the issuer's legitimate interests. What is referred to as legitimate interests, for example, involve ongoing negotiations or transactions in which they came known to the public could damage the Issuer.
- ii) The issuer can ensure that the postponement does not mislead the public.
- iii) The information can be handled with strict confidentiality and the Issuer can ensure that the information remains confidential.

b) Issuer's CEO is responsible for the decision on the suspension and that such a decision satisfies the above conditions, and that the required documentation is compiled and maintained confidential for five years.

c) In connection with the postponement occurs, an insider list is drawn up. Method and responsibilities for this is found in the section "Insider List".

- d) When the decision of suspension is taken to be the Issuer Certified Adviser informed, and to be the documents the Issuer has prepared and which is the basis for the decision. Issuer's CEO is responsible to the information provided to the Issuer Certified Adviser.
- e) Decisions and management of postponement should be in accordance with clearly established procedures and well in advance.
- f) If the Issuer is unable to ensure the confidentiality of information, the information as quickly as possible published by a recognized news distributor. In connection with the decision of suspension be The issuer must therefore prepare a press release that can be released if the information would leak out. The press release will be in conjunction with other documentation submitted to the Issuer Certified Adviser also controlled by the latter. It is the issuer's responsibility to prepare the press release and to make the necessary adjustments as the Certified Adviser suggests.
- g) The Issuer shall have clear procedures for how insider information is handled. If someone within the organization discovers that inside information in connection with the postponement has been leaked to the individual / individuals should Information about this immediately communicated to the issuer's CEO. The information to be communicated include the same information that is included in the Issuer event-specific insiders. If the information can be kept confidential company CEO responsible for these people out into the event-specific insider list. If the Issuer is unable to ensure that the information can be preserved Confidential information shall be published in accordance with this policy.
- hrs) The issuer shall once the information is published send a notice to the FSA and announce he has postponed the date of publication. The issuer must immediately be able to produce documentation on and that the requirements for the postponement of the information have been met if the FSA requests to take part of substrate. It is the Issuer's CEO is responsible for the information provided to the FSA without delay.

#### 7th Transactions made by persons in positions of

- a) Issuer on the regulated markets and MTFs and OTFs covered by the national regulations concerning transactions by persons with managerial positions.
- b) Persons discharging managerial responsibilities within the issuer are:
- in) Member of the company's administrative, management or supervisory bodies,
  - ii) Senior executives of the company (not a member of the above bodies), with regular access to inside information that directly or indirectly relate to the company and with power to make managerial decisions affecting the company's future development and business prospects.
- c) Related to management executive consists of:
- in) wife / spouse or person treated as analogous to the husband / wife in accordance with national law (Includes partner),
  - ii) the children of the person discharging managerial responsibilities in accordance with national law,
  - iii) a relative who has shared the same household for at least one year at the date of the transaction taken place, or
  - iv) legal entities, trusts or partnerships whose managerial responsibilities are discharged by a person in leadership or related natural person, or directly or indirectly controlled by a Such a person, or set up for the benefit of such a person, or whose economic interests are substantially equivalent to those of such person.
- d) The Issuer's responsibilities incumbent to:
- in) The issuer shall establish and maintain a list of people in senior positions, and to them related persons.
  - ii) In writing the management personnel of their obligations under Article 19 of the Mar 596/2014, which appears in the subsection "Responsibility for the person in a leading position," below.
  - iii) Responsible for allowing / exemptions from trade ban ( "Trade ban"). All

people classified as people in positions of Issuer subject

Trade ban.

- e) Trade ban is a ban that applies to people with a leading position in the issuer (not people related to them). It concerns a prohibition to conduct transactions on their own or another person the issuer related instruments or securities for 30 calendar days before the publication of a interim or year-end report that the issuer is required to disclose under national law or according to the regulations of the venue where the security is traded. The issuer applies even Trade ban on interim reports by him are not legally required to disclose, for example, interim reports for the first and third quarters.
- f) The issuer has the right to waive the ban on trading in certain circumstances. It is enough However with the current person in the leadership believes that there is an exception. Requires Thus approval by the Issuer. Such circumstances may include external unexpected events that the person has no control. Examples of such unexpected events is divorce or that such tax liabilities arise unexpectedly that allows the person forced to sell of its shares promptly. Issuer's CEO is ultimately responsible for providing exemptions from the ban on trading. If it is the President who request exemption to all members of the Board of the Issuer in writing grant exemptions. President should not participate in decisions involving their own exceptions.
- g) Responsibility for the person in a leading position:
  - in) Report notifiable transactions to the issuer and the FSA,
  - ii) Writing notify relatives of their obligations, and keep a copy of the notification (Notifications by e-mail is deemed to have been made in writing) for five years,
  - iii) Observe the ban on trading of person discharging managerial responsibilities subject.
- hrs) People in positions to report notifiable transactions in shares and debt instruments issued by the issuer, or to derivatives or other financial instruments related to these instruments - Also includes transactions that take place within the framework of an endowment.
- in) Reporting is required only when an aggregate transaction amount of 5000 EUR has been achieved in a calendar year.
- j) The person in a leading position to report obligation to report transactions and partly to the Issuer and partly to FSA. It must be made no later than three business days after the transaction has taken place. First will be reporting on the FSA website. The acknowledgment is received at the reporting shall then sent to the Issuer. The issuer shall in accordance with clearly established procedures to archive data transactions for a period of at least five years from the date the information was obtained.
- k) Insider person wishing to trade shares in the company should contact CEO or the Chairman to consult on the is the appropriate time to trade before trading takes place.

#### Eighth insider List

- a) The issuer is responsible for an insider list drawn up when the need arises. Insider list should established when events occur which means that the people who work for the issuer access to inside information. The purpose of the insider list is to give the Issuer control which people who have access to inside information concerning the Issuer. It is CEO responsible for insider list prepared in accordance with applicable regulations and that it is updated whenever the need arises.
- b) Insider list consists of a list of all persons who have access to inside information, and working for them, through contracts or otherwise performing tasks through which they have access insiders, such as consultants, accountants or CRA.
- c) The Issuer shall promptly update the insider list, and submit the insider list to FSA as soon as possible after the request by the Authority.
- d) When specific inside information arises in the Issuer in respect of a particular event, and he does not public, should an event-driven insider list is drawn up.
- e) The issuer shall establish a permanent insider list in which the board and management should be included.



- f) The issuer shall establish insider lists in accordance with the templates for insider lists should designed as found in Commission Implementing Regulation (EU) 2016/347.
- g) Insider list shall be in electronic form and access to them will be limited. Issuer to ensure that access is limited by only those who are registered to conduct insider list have access to the list.
- hrs) The issuer shall ensure that persons entering the insider list confirms in writing that they have received information and that the person understands the nature of this. Documentation shall be kept for five years by both parties. The issuer must therefore inform the other party that he should retain the documentation for five years.
- in) Insider list shall be kept for five years after being drawn up or after it was last updated.
- j) The issuer shall ensure that he always has full access to the insider list. If an advisor for a underlying issuer insider list carries full responsibility for this and will always have full access to it.

#### 9th market Probe

- a) Market soundings are interactions between a seller of a financial instrument and one or more potential investors before a transaction is notified, in order to assess the potential investor interest a possible transaction and its pricing, size and structure. Market soundings may include an initial public offering or subsequent sale of securities, and different from the usual trade. They are very valuable tools for assessing the potential investor opinions, improve dialogue between shareholders, ensuring that trade runs smoothly and that issuers, existing shareholders and potential new investors' views be reconciled.
- b) Implementation of market soundings may require inside information to potential investors. The Issuer shall, before the sounding starts assess whether the market sounding will involve inside information. If so, an insider list is drawn up. The CEO is responsible for make this assessment and that appropriate procedures are established and followed for market soundings.
- c) In probing the Issuer shall inform Mar and that the recipient may not act on the information provided.
- d) After finishing the probing Issuer shall inform when insider position has ended.
- e) Persons receiving probing should independently assess whether it is inside information, and inform if the information is not desired received.
- f) Both the prober and the receiving probe it will document what the parties agree if. Both parties should save the documentation from the sounding of five years.
- g) The Issuer will use the Certified Adviser recommended templates for documentation on probing should be done.

#### 10. Procedures for the market rumors

- a) Issuer's main principle is not to comment on matters, speculation and rumors in the market stemming Issuer. Rumors which this may be due or may be unfounded.
- b) Rumors on the market and / or speculations regarding the Issuer may arise without having leaked information from the Issuer. Issuer There is no obligation to act on rumors that lack relevance or are based on false and misleading information from persons 8 outside the Issuer's control. In such situations, the Issuer may elect to not comment on rumors.
- c) Once a reputation is concrete enough and deemed to be of sufficient substance to indicate a information leak, and regardless of where the confidential information is derived from, the inside information is made public as soon as possible.

- d) There may be situations when an untrue rumor has a significant impact on the issuer's share price and when Issuer, after consultation with the Certified Adviser and trading place, may choose to provide the market with accurate information and thereby create conditions to share once again be traded at the "right price".
- e) The CEO is responsible for decisions on disclosures regarding rumors should be done and for the information published in conjunction with this.
- f) Trading venue rules should always be the basis of the Issuer's decision.

#### 11th other procedures

- a) CEO is responsible for inside information in the form of press releases and financial reports public without delay on a non-discriminatory manner to the public.
- b) For distribution, an established and trading place approved electronic news distributor ensures that a trading venue, media and public at the same time can take part of the information published without delay.
- c) CEO responsible for the preparation and compilation of interim reports, financial statements and annual report and other financial information.
- d) While interim and year-end report will be published as a press release in which inside information compiled in a press release and the report is attached in its entirety.
- e) Press Release commented upon only by the CEO.
- f) Press releases are published in Swedish and English.
- g) All communication with the financial markets and the media for the issuer takes place exclusively through The issuer's CEO or CFO. Other employees and executives of the Issuer contacted by investors, shareholders, analysts and the media should always refer directly to CEO / CFO without further comment. Subsidiaries and employees of the subsidiaries, the Group does not communicate with the media without approval from CEO.
- hrs) CEO is responsible for the Issuer's website. The website will be updated with the necessary information as Trading venue requirements. The website should be such as press releases, financial reports, information from the Annual General Meeting, the Articles of Association, and the ownership and contact information published. CEO responsible to the website contains current and accurate information. The website is [www.ridercamsystems.com](http://www.ridercamsystems.com).

#### 12th Information Certified Adviser

- a) Call the company's auditor regarding situations that may affect the value of the Company share.
- b) The Issuer shall, as soon as possible, notify the Certified Adviser on new issues, company changes, split and other similar events.
- c) Certified Adviser is in turn responsible for informing the trading place, which provides the information disseminated to the market through stock exchange releases.
- d) At the entry of new financial instruments to trading on a trading venue, ie, subscription rights, paid shares (BTA), units, options, purchase rights mm. need shopping center, five trading days to resume instruments to trading on INET system. This means that the Certified Adviser need information at least six trading days before the trade is expected to begin.
- e) If the Issuer decides to postpone the publication, the Certified Adviser contacted.

#### 13th Information Certified Adviser and trading place

- a) In the event that the Issuer intends to acquire another listed company or that the Issuer received information that another party seeking to acquire issuer shall Certified Adviser and trading place informed.



- b) In the event that the Issuer intends to publish information that could materially affect the issuer's share price will Certified Adviser and trading place informed before the announcement is made.
- c) In the event that the Issuer's Board of Directors decides to apply for delisting of its financial instruments The trading venue shall Certified Adviser and the Issuer immediately.

14th crises

During a crisis or negative publicity, it is primarily the CEO determines the media strategy and secondly Chairman. The shopping center and the Certified Adviser should be contacted immediately for advice.