

# INSTRUCTIONS FOR HANDLING INSIDE INFORMATION AND CONFIDENTIAL INFORMATION



**Adopted by the Board of Directors on 15 February 2016,  
revised on 3 March 2021 and reaffirmed on 16 September 2021.**

*This document is adopted to secure that B2Holding ASA (“**B2Holding**” or the “**Company**”, and together with its consolidated subsidiaries the “**B2Holding Group**”) complies with applicable regulations regarding the Company’s business. In addition, this document sets the applicable rules for handling confidential information within the B2Holding Group.*

*These instructions for handling inside and confidential information are subject to the annual review by the board of directors of B2Holding.*

*This document is solely for the internal use of the B2Holding Group, and no one other than B2Holding can invoke breach of the content. Breaches of the content can however lead to sanctions from public authorities if the action also is a breach of any public regulations.*

**CONTENT**

<b>1</b>	<b>BACKGROUND AND PURPOSE</b> .....	<b>3</b>
<b>2</b>	<b>SCOPE OF APPLICATION</b> .....	<b>3</b>
<b>3</b>	<b>DEFINITIONS</b> .....	<b>3</b>
3.1	INSIDE INFORMATION .....	3
3.2	CONFIDENTIAL INFORMATION.....	4
<b>4</b>	<b>INSIDE INFORMATION AND CONFIDENTIAL INFORMATION</b> .....	<b>4</b>
4.1	TREATMENT WITHIN THE B2HOLDING GROUP .....	4
4.2	INTERNAL AND PRIVATE LIABILITY .....	4
4.3	CRIMINAL LIABILITY.....	4
<b>5</b>	<b>LISTS</b> .....	<b>4</b>
5.1	INSIDER LIST .....	4
5.2	CONFIDENTIAL LIST .....	5
5.3	DIGITAL PLATFORM.....	5
<b>6</b>	<b>DUTIES AND RESPONSIBILITIES</b> .....	<b>5</b>
6.1	MANAGEMENT .....	5
6.2	CHIEF LEGAL AND COMPLIANCE OFFICER .....	6
6.2.1	Duty to inform .....	6
6.2.2	Duty to maintain, update and archive the Lists .....	6
6.2.3	Duty to publicly disclose Inside Information .....	6
6.3	EVERYONE .....	7
6.3.1	Prohibition to use .....	8
6.3.2	Duty to exercise due care .....	8
6.3.3	Duty to maintain confidentiality .....	8
6.3.4	Duty to notify.....	9
6.3.5	Duty to continuously assess .....	9
<b>7</b>	<b>FINANCIAL REPORTING AT B2HOLDING</b> .....	<b>9</b>
7.1	QUALIFICATION OF FINANCIAL RESULTS .....	9
7.2	SPECIAL RULES AND PROCEDURES .....	9
7.2.1	Public disclosure.....	9
7.2.2	Continuous assessment and corporate update to the market.....	9
7.2.3	Creation of an Insider List.....	9
7.2.4	Prohibition for Primary Insiders to trade during closed periods.....	10
<b>8</b>	<b>APPENDICES</b> .....	<b>10</b>

## 1 BACKGROUND AND PURPOSE

These instructions (“**Instructions**”) set the rules and procedures for the handling both inside information (“**Inside Information**”) and confidential information (“**Confidential Information**”) within the B2Holding Group, together thereafter referred as (“**Information**”).

Proper handling of Inside Information, as defined under Clause 3.1, is required as B2Holding is the issuer of both listed shares and other financial instruments such as listed bonds (“**Financial Instruments**”). B2Holding’s statutory duties to ensure the proper handling of Inside Information are as follows:

- B2Holding must have rules and procedures for the secure handling of Inside Information.
- A list (“**Insider List**”) must be kept of persons who are given access to Inside Information and the Insider List must be continuously updated (cf. Clause 6).
- Persons who are given access to Inside Information shall be made aware of the duties and responsibilities that this entails (cf. Clause 6), as well as the criminal liability involved (cf. Clause 4.3), and B2Holding must all take all reasonable steps to ensure that any person on the Insider List acknowledges in writing the legal and regulatory duties entailed and is aware of the sanctions applicable to insider dealing and unlawful disclosure of Inside Information.

The purpose of these Instructions is namely to fulfil the above-mentioned statutory duties and to increase the individuals’ awareness of the responsibility entailed by the possession of Inside Information and the consequences of misusing such information.

Furthermore, these Instructions set the rules and procedures for handling Confidential Information as defined under Clause 3.2, within the B2Holding Group.

## 2 SCOPE OF APPLICATION

These Instructions apply to any natural and legal persons, in particular but not limited to, all employees of the B2Holding Group, regardless of their role, function and status, all appointed and/or elected officers such as Board members, internal auditors, etc. of the B2Holding Group, as well as external advisors, auditors, banks, etc. (“**Everyone**”).

It is the responsibility of all persons in possession of and/or with access to Inside information and/or Confidential Information to ensure that he or she complies with these Instructions and any queries with regards to the following provisions, duties and obligations arising out of them, should be directed to the Chief Legal and Compliance Officer (“**CLCO**”). They must read these Instructions in its entirety to understand their duties and obligations, and confirm to B2Holding that they have received, read and understood these Instructions by returning the acknowledgment attached hereto as **Appendix 2**.

Primary Insiders and their Related Parties are, in addition to the duties and responsibilities set out in these Instructions, subject to specific provisions set forth in the “**Rules for Primary Insiders**”. Further details regarding the rules and procedures for trading Financial Instruments, as well as the Primary Insiders’ duty of clearance prior to trading and Primary Insiders’ and their Related Parties’ duty of notification of trades are set out in those Rules.

## 3 DEFINITIONS

### 3.1 Inside Information

Inside Information means any 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<sup>1</sup>.

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<sup>1</sup> MAR art. 7

Inside Information may, for instance, be knowledge of a forthcoming acquisition offer, financial results, own transaction decisions, contract negotiations, investment decisions and decisions made by public authorities or information regarding framework conditions to which the issuer is subject.

The information does not need to be complete to be regarded as Inside Information, but it must be distinguished from rumours, assumptions and speculations. As a rule, such information will be relevant in relation to all forms of Financial Instruments issued by B2Holding. However, there may also be cases in which information is regarded as Inside Information solely in relation to B2Holding' shares (and related Financial Instruments such as options, etc.) and not in relation to listed bonds, and vice versa. This should be assessed in each individual case.

Information becomes Inside Information at the time a reasonable investor would be likely to make use of the information as part of the basis for his or her investment decision. For example, information may become Inside Information at the latest when, in a negotiation process, it is a reasonable prospect that B2Holding is the preferred bidder and a contract will be concluded. Each situation must be assessed individually and reassessed on an ongoing basis. In any case, the situation must be reassessed if the circumstances at stake have changed.

### **3.2 Confidential Information**

A Confidential Information is any information which is considered to be particularly sensitive, important and valuable for B2Holding, which may become Inside Information at a later stage, which is not generally known and which B2Holding wishes to maintain as confidential or Information that is restricted to a limited group of people for an unlimited period of time.

## **4 INSIDE INFORMATION AND CONFIDENTIAL INFORMATION**

### **4.1 Treatment within the B2Holding Group**

Within the B2Holding Group, Inside Information and Confidential Information are to be regarded and treated in the same way. In other words, the rules and procedures, as well as the related consequences for not complying with them, apply without distinction for both Inside Information and Confidential Information.

### **4.2 Internal and private liability**

Within the B2Holding Group, any contravention with the rules and procedures for handling Insider Information and/or Confidential Information set out in these Instructions may result, for the offenders, in personal liability for damages towards B2Holding and/or any other parties, as well as internal measures that may, depending namely on the severity of the breach, result in disciplinary sanctions (including termination of employment).

### **4.3 Criminal liability**

In addition to the consequences for non-compliance set out under Clause 4.2, which apply equally and indistinguishably to both Inside Information and Confidential Information, the use and contravention with the rules and procedures for handling Inside Information<sup>2</sup> (and not Confidential Information) can constitute a criminal offence punishable by fines or imprisonment. Both wilful and negligent contraventions are punishable, as are aiding and abetting, and attempted contraventions.

## **5 LISTS**

### **5.1 Insider List**

A list shall be maintained for each and every person, natural or legal, who has access to Inside Information and who is working for B2Holding under a contract of employment, or otherwise performing tasks through which he or she has access to Inside Information, such as advisers, accountants or credit rating agencies ("**Insider List**").

The Insider List shall be divided into separate sections relating to different Inside Information. New sections shall be added to the Insider List upon the identification of new Inside Information, depending on the type and nature of

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<sup>2</sup> MAR art. 8 and 14

the Inside Information and in what context it has been acquired (e.g. specific project, specific access to information which qualify *de facto* as Inside Information such as the access to personal data by the Human Resources, financial reports (cf. Clause 7), etc.). Each section of the Insider List shall only include details of individuals having access to the Inside Information relevant to that section.

In the following circumstances, the Insider List shall be updated promptly and specify the date and time when the change triggering the update occurred, recorded as required by InsiderLog:

- (a) where there is a change in the reason for including a person already on the Insider List;
- (b) where there is a new person who has access to Inside Information and needs, therefore, to be added to the Insider List; and
- (c) where a person ceases to have access to Inside Information.

## **5.2 Confidential List**

A list shall be maintained for each and every person, natural or legal, who has access to a matter (e.g. project, contract, process, financial report, risk assessment, etc.) which includes Confidential Information (cf. Clause 3.2) ("**Confidential List**").

The Confidential List shall be divided into separate sections relating to different Confidential Information. New sections shall be added to the Confidential List upon the identification of new Confidential Information, depending on the type and nature of the Confidential Information and in what context it has been acquired. Each section of the Confidential List shall only include details of individuals having access to the Confidential Information relevant to that section.

The purpose of the Confidential List is to raise awareness of the duty of confidentiality and facilitate compliance with statutory listing requirements.

The Confidential List shall be created and maintained as long as the information fulfils the conditions to be regarded and treated as confidential, even if there is reason to assume that this Confidential Information will not become Inside Information until a later stage. In the event where the Confidential Information becomes Inside Information, a new section in the Insider List shall be created and the existing section in the Confidential List shall be deleted and archived.

## **5.3 Digital platform**

B2Holding may use an external service provider to maintain, update and archive both the Insider List and the Confidential List (together the "**Lists**"). This can be done online, using a digital platform owned and monitored by an external service provider.

As of today, the Insider List and the Confidential List are established and maintained through "**InsiderLog**", the insider tool provided as a service by the Oslo Stock Exchange and subscribed to by B2Holding.

B2Holding remains however responsible for ensuring that the external service provider maintains the Insider List in accordance with the applicable statutory requirements, such as the ones set out by the Market Abuse Regulation ("**MAR**"). The appropriateness of delegating such responsibility for maintaining the Insider List must be assessed in each individual case and shall always be approved by the CLCO.

# **6 DUTIES AND RESPONSIBILITIES**

## **6.1 Management**

The Company's executive management (the "**Management**") shall ensure that everyone in possession of Inside Information and/or Confidential Information receive the necessary information in order to understand the rules, the duties and the procedures set out in these Instructions.

## **6.2 Chief Legal and Compliance Officer**

The responsibility related to the proper handling of Inside Information and/or Confidential Information within the B2Holding Group lies with the CLCO, who shall act in accordance with the duties that are described in further details below.

### **6.2.1 Duty to inform**

The CLCO shall assist the Management in providing the relevant persons with the necessary information and practical training in order for them to be able to understand the duties and the procedures set out in these Instructions.

The CLCO shall take all reasonable steps to ensure that the persons included into one of the Lists are duly informed and thus acknowledge in writing that they have read and understood that they have been included into one of these Lists and the duties and liabilities that this entails.

When included on the Insider List, the CLCO shall take all reasonable steps to ensure that the person included on the Insider List acknowledges in writing that he or she is aware of the legal and regulatory duties entailed by being included into this List and of the sanctions applicable to unlawful use and/or disclosure of Inside Information, by acknowledging receipt of the automatic e-mail from InsiderLog hereunder referred to.

Insiderlog provides indeed an automatic e-mail to all persons that are included into a List (Insider List or Confidential List) informing them that they have been entered on the List, as well as the duties and responsibilities that this entails, and with respect to the Insider List, the criminal liability that attaches to use or unwarranted use of Inside Information (cf. Clause 4.3).

Further details relating thereto can be found on the “**Notice on entry**” in Insiderlog (cf. **Appendix 1A** for the inclusion into the Insider List and **Appendix 1B** for the inclusion into the Confidential List).

A new automatic e-mail from InsiderLog shall be sent to the persons that are included on a List informing them once they have been removed from the List or when the List is terminated.

### **6.2.2 Duty to maintain, update and archive the Lists**

The CLCO is responsible to create and maintain the Lists on Insiderlog (cf. Clause 5.3), and to ensure that the Lists are updated in appropriate and timely manner.

In the event where a person communicates or otherwise make Information available to another person, the CLCO shall immediately put the recipient of this Information on the Insider List or the Confidential List, as appropriate. The CLCO shall, at the latest at the time the person is included into the relevant List, make sure that the recipient of such Information has been made aware of the duties and responsibilities that such access entails (cf. Clause 6.2.1). The CLCO shall ensure that a proper system is established and maintained for acknowledgements of receipt of Information (cf. Clause 6.2.1), and that the Lists are duly archived for proper safekeeping as long as the person is employed or has duties related to his or her engagement with B2Holding.

The statutory duty to retain the Insider List applies for a period of five years as from the date it is drawn up or updated. Within B2Holding Group, the Confidential List is also kept for a five-year retention period. The Insider List shall be submitted to the Financial Supervisory Authority of Norway (“**FSA**”) and/or to the Oslo Stock Exchange upon request.

### **6.2.3 Duty to publicly disclose Inside Information**

As a main rule, the CLCO shall immediately and publicly disclose any Inside Information regarding B2Holding's Financial Instruments on Oslo Børs/Euronext through NewsPoint. This Information should be distributed through media and sent to the officially appointed mechanism in Norway in accordance with B2Holding's distribution agreement with Oslo Børs/Euronext.

Once made public, all Inside Information must be available on B2Holding's website for a period of at least five years from the time of the public disclosure of such Inside Information. The posts on the website shall clearly indicate the date and the time of the disclosure and that the Inside Information is organised in chronological order.

In some cases, public disclosure may be delayed so as not to prejudice B2Holding's legitimate interests, such as the possibility of carrying out a project, and as long as the delay of the disclosure is not likely to mislead the public and B2Holding is able to ensure the confidentiality of that Inside Information. The decision as to whether the conditions for delayed public disclosure are satisfied shall be made by the CLCO. If delayed disclosure of Inside Information is resolved:

- a) The CLCO shall then, immediately and on a confidential basis, notify the stock exchange of the matter and the reason for the delay, and stress that B2Holding has begun to keep a list of persons with access to the Inside Information. Such notification shall be given to the competent body:
  - the Market Surveillance Department<sup>3</sup> where shares are concerned; and/or
  - the Fixed Income Department<sup>4</sup> where bonds are concerned.
- b) The CLCO shall keep an Insider List of the persons with access to the Inside Information and immediately include the person who has access to the Inside Information onto this Insider List;
- c) The CLCO shall make a written record of the dates and times when the Inside Information first existed within B2Holding, when the decision to delay the disclosure was made and when B2Holding is likely to disclose the Inside Information. The written record shall also include the identity of the person responsible for making the decision to delay the disclosure and deciding on the start of the delay and its likely end, ensuring the ongoing monitoring of the conditions for the delay, making the decision to publicly disclose the Inside Information and providing the requested information about the delay upon request from the Oslo Stock Exchange. Finally, the written record must include evidence of the initial fulfilment of the conditions for delayed disclosure and of any change of this fulfilment during the delay period, including the internal and external information barriers and the arrangements put in place to disclose the relevant Inside Information as soon as possible where the confidentiality is no longer ensured; and
- d) The CLCO shall disclose that Inside Information to the public as soon as possible where the confidentiality of the Inside Information is no longer ensured, including situations where a rumour explicitly relates to Inside Information, where that rumour is sufficiently accurate to indicate that the confidentiality of that information is no longer ensured.

Where the disclosure of Inside Information has been delayed, the CLCO shall immediately after the Inside Information is disclosed to the public:

- a) inform the Oslo Stock Exchange that the disclosure of the Inside Information was delayed; and
- b) upon request by the Norwegian FSA and/or to the Oslo Stock Exchange, provide a written explanation of how the conditions for the delayed disclosure were met.

### **6.3 Everyone**

Each and every one who receives or otherwise is in possession of Inside Information and/or Confidential Information regarding B2Holding's Financial Instruments shall act in accordance with the prohibitions and duties that are described in further details below.

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<sup>3</sup> Avdelingen Markedsovervåking

<sup>4</sup> Børsens renteavdeling

This section is not necessarily a complete list of duties and responsibilities related to Inside Information. Indeed, each person being in possession of Inside Information is obliged to keep him- or herself updated, on a regular basis, as to the legislative framework concerning Inside Information.

Everyone in possession of Inside Information and/or Confidential Information must read these Instructions in its entirety to understand their duties and obligations, and confirm to the Company that they have received, read and understood these Instructions by returning the Acknowledgment attached hereto as **Appendix 2**. These Instructions is an appendix to the applicable employment agreement.

### **6.3.1 Prohibition to use**

No one must acquire or dispose of (e.g. subscribe for, purchase, sell or exchange) Financial Instruments issued by B2Holding if he or she is in possession of Information regarding B2Holding related Financial Instruments.

This prohibition applies to every natural and legal person, indirect (e.g. through a controlled investment company) and direct trading, and trading both for own account and for a third party's account, irrespective of form of settlement. For the avoidance of doubt, this prohibition applies also to trades made by others in the name of persons having such Information. The prohibition also applies to incitement to trade, i.e. persons who have Information regarding B2Holding related Financial Instruments are not allowed to give other persons advice and/or in any way influence other persons to carry out, or refrain from carrying out, such transactions.

This applies correspondingly to the entry into, purchase, sale or exchange of options, forward/futures contracts or similar rights (including financial derivatives) related to such Financial Instruments or to incitement to carry out such transactions.

The prohibition applies only to trades that can be characterised as "use" of Information. Whether or not the trade constitutes use must be assessed in each individual case.

The use of Inside Information by cancelling or amending an order concerning a Financial Instrument to which the information relates where the order was placed before the person concerned possessed the Inside Information, is also considered as unlawful use of Inside Information.

### **6.3.2 Duty to exercise due care**

Anyone who is in possession of Information has a duty to ensure proper handling and to secure this Information, meaning that he or she must, in handling such Information, exercise due care in order to ensure that this Information does not come into the possession of unauthorised persons or is used. Further details of routines for ensuring secure handling of Inside Information and Confidential Information may be found in the document attached hereto as **Appendix 3**.

### **6.3.3 Duty to maintain confidentiality**

Inside Information and Confidential Information shall not be given to or in other ways made available to an unauthorised person.

The Information may only be communicated or made available to another person if the recipient has a relevant, well-founded need for the Information, assessed on the basis of B2Holding's interests, and the disclosure is made in the normal exercise of the employment, profession or duties of the person disclosing the information. A strict "need to know" principle applies, i.e. as few people as possible shall have access to the Information, as late as is practically possible.

Anyone who communicates Information or makes such Information available to another person has an independent responsibility for ensuring that the person who is given access to the Information is simultaneously made aware of the duties and responsibilities entailed by the receipt of such Information, including the duty of confidentiality, the duty of proper handling of the Information, the duty not to use it and, in case of Inside Information, the criminal liability that attaches to the use or unwarranted distribution of such Inside Information. The above applies regardless of whether the recipient is within or outside of the B2Holding Group.

#### **6.3.4 Duty to notify**

Anyone who gains knowledge of Information shall immediately notify the CLCO. In case of doubt, he or she shall regardless immediately notify the CLCO. Anyone in possession of Information who is to communicate or otherwise make this Information available to another person must immediately notify the CLCO and, if possible, before the Information is communicated. The duty of the CLCO to include this person into the relevant List is foreseen in Clause 6.2.2.

Compliance with this duty of notification is essential for B2Holding in order to have an overview of both Inside Information and Confidential Information and to ensure that the persons who are given access to Inside Information are well aware of the criminal liability attached thereto and to fulfil its statutory duty to maintain an Insider List.

#### **6.3.5 Duty to continuously assess**

Everyone has a duty to continuously assess whether the information which he or she receives or gains access to may be considered as Inside Information and/or Confidential Information. Should the information be considered as Confidential Information, it should be assessed whether it is likely to become Inside Information.

### **7 FINANCIAL REPORTING AT B2HOLDING**

#### **7.1 Qualification of financial results**

Both the non-consolidated financial results at business area level (i.e. secured, unsecured and non-core segments) and the consolidated financial results in connection with the quarterly financial reporting of the B2Holding Group shall be assessed, in each individual case, in order to determine whether they are to be regarded and treated as Inside Information (cf. Clause 3.1) or as Confidential Information (cf. Clause 3.2).

The quarterly financial reporting shall however always be regarded and treated as Inside Information during the 30 calendar days period prior to the publication of the Financial Report on Oslo Børs/Euronext's Newspoint. The Information shall be handled in accordance with the duties and responsibilities set forth in these Instructions (cf. Clause 6), but with the adjustments and clarifications set forth in Clause 7.2.

#### **7.2 Special rules and procedures**

##### **7.2.1 Public disclosure**

The main rule is that where the conditions for delayed public disclosure are deemed to be satisfied for the consolidated financial results prepared in connection with the quarterly reporting of the B2Holding Group, but this must still be assessed on a case-by-case basis.

##### **7.2.2 Continuous assessment and corporate update to the market**

The Company's finance department must continuously assess whether the financial results for the period reveal substantial variances (significantly worse or better) from expectations created by the Company (i.e. expectations that can be traced back to information provided by B2Holding itself). This assessment must be carried out in consultation with the CLCO. If appropriate, B2Holding's CLCO must then decide whether to provide a corporate update to the market (e.g. profit or loss warning and/or any other incidents that can be of interest for the market).

##### **7.2.3 Creation of an Insider List**

As soon as the quarterly financial statements is providing a clear picture of the B2Holding Group's consolidated and non-consolidated financial situation and/or as soon as the consolidated quarterly information is available, the Company's finance department shall immediately notify the CLCO, who should include the persons who are in possession of this information into an Insider List for financial reporting.

**7.2.4 Prohibition for Primary Insiders to trade during closed periods**

Primary Insiders are prohibited to trade the Company's Financial Instruments in the period leading up to 30 calendar days prior to the Company's release of financial information to the market (quarterly reports). Please refer to the Rules for Primary Insiders for further details.

**8 APPENDICES**

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**INSIDERLOG – EMAIL TO NOTIFY THE INCLUSION INTO THE INSIDER LIST**

You have been entered on the Insider List for B2Holding ASA (the "**Company**") due to your access to information regarding a project, an event or a special subject, named {insiderListTitle}, as referred to in Article 7 of the EU Regulation 596/2014 ("**MAR**"). Please go to {applicationLink} to provide the Company with your personal data, your confirmation and acknowledgement of your duties and responsibilities in connection with the Company's regulatory duty to maintain the Insider List. Further description of your duties:

The reason for this filing is that you have access to information regarding the project, the event or the subject referred to as {insiderListTitle}, cf. Article 18 of MAR.

Consequently, you are now subject to the following duties and responsibilities:

- Prohibition of the use of Inside Information: Persons possessing Inside Information may neither directly nor indirectly, for own or third-party account, use Inside Information to subscribe, purchase, sell or exchange financial instruments or incite others to carry out such transactions.
- Duty of confidentiality and prohibition of unlawful disclosure of Inside Information: Persons possessing Inside Information must not disclose such Information to unauthorised persons **and where** the disclosure is made in the normal exercise of an employment, a profession or duties. Persons possessing Inside Information shall handle such information with due care so that the Inside Information does not come into the possession of unauthorised persons or is used. Legal entities that are regularly in possession of Inside Information shall have routines for secure handling of Inside Information.
- Prohibition on giving advice: Persons possessing Inside Information shall not give advice about trading in financial instruments to which the Information relates.
- If you are also a Primary Insider of the Company, you are also subject to the duty to obtain clearance prior to trading in Financial Instruments issued by B2Holding and certain other obligations and prohibitions notified separately.

Use or unwarranted distribution of Inside Information may be punished by fines or by imprisonment not exceeding six years pursuant to Chapter 21 of the Securities Trading Act ("**STA**"), personal liability and/or disciplinary sanctions (including termination of employment). If an unlawful gain is obtained by negligent or wilful violation of these provisions, the party to whom such a gain has accrued may be ordered to surrender all or part of the gain.

The termination of the Insider List will be notified separately after the end of the project.

Thank you!  
Best regards,  
{email}  
{companyName}

**INSIDERLOG – EMAIL TO NOTIFY THE INCLUSION INTO THE CONFIDENTIAL LIST**

You have been entered on the Confidential List of B2Holding ASA (the “**Company**”) due to your access to Confidential Information regarding a project, an event or a subject named {insiderListTitle}. Please go to {applicationLink} to provide the Company with your confirmation, your acknowledgement of your duties and responsibilities and your personal data, in connection with your access to the Confidential Information.

Although this Confidential List is not a formal Insider List in accordance with Section 3-5 of the Securities Trading Act (“**STA**”), any sharing of Information outside the group of persons already included in the Confidentiality group above, is to be regarded as a breach of your confidentiality obligation and may have the same consequence as if it were Insider Information, including personal liability and disciplinary sanctions (hereunder termination of employment). Consequently, we urge you to treat the Information with due care and highly confidential in accordance with our current internal procedures and your contractual obligations to the Company.

In connection with managing the Confidential List as described above, we need you to verify certain personal data and your acknowledgement of receipt by following the link {applicationLink} and provide your information and confirmation.

Thank you!

Best regards,

InsiderLog  
{companyName}

**ACKNOWLEDGEMENT**

To B2Holding ASA

Attn.: Chief Legal and Compliance Officer

I hereby acknowledge that I have received a copy of the Instructions for handling Inside Information and Confidential Information within B2Holding, which is an appendix to my employment agreement.

I further confirm that I have read these Instructions and that I am familiar with their content. I acknowledge that violations or any non-compliance of these Instructions may result in disciplinary sanctions (including termination of employment), and liability for damages towards B2Holding ASA or its group companies. I further acknowledge that in case of use of Inside Information, I am subject to punishment as set out in Chapter 21 of the Securities Trading Act.

<b>Date:</b>	<b>Name:</b>	<b>Position:</b>	<b>Signature:</b>
			<hr/>

NB: This acknowledgment should be signed by any person with access to and/or in possession of Inside Information and/or Confidential Information.

## ROUTINES FOR SECURE HANDLING OF INSIDE INFORMATION AND CONFIDENTIAL INFORMATION

Inside Information and Confidential Information are hereafter together referred as: "Information"

### 1 Technical devices

- **Use password protection** on PC, tablets, phones and other electronic devices that contain Information. Change password on a routinely basis.
- **Do not store Information** locally in PC hard disks.
- Make sure you have solutions in place for **remote disabling** of phones or tablets that are synced with your email, in case of loss or theft.
- **Always log off devices** with access to Information before leaving them.

### 2 Document handling

- **Protect documents.** All documents with Information should be sent via secure channels or be secured with password protection.
- **Be careful when distributing Information.** Do not distribute Information directly by email, but put the information in a password protected document (Word, PowerPoint, Excel, PDF, etc.)
- **Limited access to files and documents.** In certain events as decided by the CLCO, documents should be placed in restricted folders. In such cases, the CLCO is responsible ensuring that no unauthorized person has access to such restricted folders and documents. User access can only be given by requesting this by email to the CLCO.
- **Consider carefully whether you need to keep Information as printed documents.** Each individual is responsible for ensuring that confidential information kept as printed documents does not get in possession of unauthorized persons.
- **Be careful when printing.** Do not print documents through printers in common areas without picking up the print immediately.
- **Do not use memory sticks unless they are password protected.** They can easily be lost.
- **Secure physical documents:** When leaving your work space: make sure to lock in documents. Documents should be shredded once there is no need to keep them. Documents that are put away to be destroyed or shredded must be put in a secure box, not through regular recycling.

### 3 Personal routines

- **Be careful when mentioning anything related to Information.** Do not discuss Information in front of others, either by phone or through regular conversations.
- **Communication channels.** Consider if communication through written channel is secured, or if it should be done through verbal channels.
- **Clean desk.** Especially when handling Information kept through physical documents.
- **"Clean room".** Make sure to never leave documents with Information at meeting rooms or common areas. Also, secure clean boards; remove flip-over-sheets and all other traces when leaving the room.
- **Misplaced Information.** If you get access to or find documents that might be Information, for instance at a printer, in meeting rooms or other areas, make sure to inform the CLCO and destroy the documents immediately.