

INVESTOR RELATIONS POLICY POLIGHT ASA

Adopted by the Board of Directors on 23rd August 2018

This investor relations policy (the "IR Policy") for poLight ASA ("poLight") is based of Oslo Stock Exchange' rules, regulations and recommendations for listed companies, and in particular the Oslo Stock Exchange Code of Practice for IR, as of March 2017.

1. Purpose and scope

Investor Relations (IR) activities of poLight ASA (the "Company") shall contribute to ensure that information disclosed to capital markets participants provides the best possible basis for a fair valuation of the Company.

This IR policy shall help poLight build trust in the investor community by ensuring that Investor Relations is conducted in compliance with relevant rules, regulations and recommended practices.

The policy shall help ensure that shareholders, potential investors and other stakeholders gain simultaneous access to accurate, clear, relevant, comprehensive and up-to-date information about the company, and that poLight is perceived as an accessible, reliable and professional company by the capital markets with the aim to ensure that:

- the market price of the Company's shares reflects the real value of the Company;
- the Company's shares remain as liquid as possible;
- the price of the Company's shares develop with is as little volatile as possible; and
- the Company maintains access to capital markets, as well as reducing the cost of capital

Open, honest and timely dialogue with shareholders, potential investors, analysts and other participants of the capital markets, shall build trust and contribute to reduced cost of capital for poLight. Such dialogue should also contribute to the management and the Board of Directors of poLight obtaining relevant information about the market's views and opinions on poLight.

The Company has implemented a manual on disclosure of information and handling of inside information in order to facilitate compliance with the relevant stock exchange rules and the Norwegian Securities Trading Act.

The board of directors shall review and evaluate the content of the IR policy at least annually.

2. Responsibilities and roles

poLight's Investor Relations team (IR team) comprises the CEO and the CFO, while the responsibility for the company's IR work lies with the CFO. The CFO will be responsible for all contact with third parties relating to the Company's financial results, strategy, legal processes, acquisitions or sales, or any other kind of inside information.

The CFO is also responsible for regularly initiating updating of these guidelines upon changes in the stock exchange regulations, the Norwegian Securities Trading Act or the Norwegian Code of Practice for Corporate Governance.

3. Contact with shareholders and the financial market

All communication with shareholders shall be on an equal treatment basis and in compliance with the provisions of applicable laws and regulations. poLight shall continuously provide its shareholders, Oslo Stock Exchange and the financial markets in general with timely and precise information about poLight and its operations. The company's contact with shareholders shall be factual.

The IR team is responsible for all day-to-day contact with poLight's shareholders on behalf of the company.

The IR team may have continuous contact with larger shareholders and facilitate for such to be given a special possibility to provide direct feedback and discuss special topics. The IR team will in such cases ensure consistent and simultaneous information to all shareholders through the suitable channels.

All shareholders are free to contact the company. Authorised spokespersons should facilitate that all shareholders get the opportunity to express their views, and the spokespersons should always strive for equal and simultaneous information to all shareholders.

4. General principles

Disclosure and reporting to the financial markets and contact with shareholders, investors and analysts shall be based on the following main principles:

Compliance with laws and regulations

All disclosure, communication and reporting shall be in compliance with the applicable laws and regulations from time to time, in particular the Norwegian Securities Trading Act, the Norwegian Accounting Act and Oslo Stock Exchange' continuing obligations for listed companies. poLight shall follow the Norwegian Code of Practice for Corporate Governance, including the code's principles regarding transparency, equal treatment of shareholders and disclosure of relevant information. Further, poLight seeks to always comply with the relevant recommendations and market practices for reporting financial and other IR information, including the latest version of the "Oslo Stock Exchange Code of Practice for IR". Compliance with the Code of Practice for IR will be based on a "comply or explain" principle, which means that any deviation will be described and explained on poLight's website.

- **Inside information**
poLight shall, unless exceptions apply, promptly disclose all inside information (as defined by the Norwegian Securities Trading Act).
- **Language**
All financial and other IR information shall be published in English.
- **Channels**
Relevant information about poLight shall be given in the form of annual reports, quarterly reports, press releases, notices to the stock exchange and investor presentations in accordance with what is deemed appropriate from time to time. All such information shall be published on poLight's website, www.polight.com. poLight shall offer subscription service for stock exchange announcements and press releases.
- **Information on value drivers**
poLight shall publish accurate, clear, comprehensive and relevant information about its historical earnings, operations, long-term potential, strategies, risk factors, outlook and any other information that poLight has defined as significant and relevant value drivers for the shares. Such information shall be consistent over time, giving equal weight to positive and negative factors, thus enabling shareholders and the financial markets to draw conclusions about the value of poLight.
- **Guiding**
poLight shall not publish specific guiding on poLight's future financial results. poLight operates in accordance with a set of financial and non-financial strategic targets, established by the Board of Directors of poLight. These targets govern poLight's operations within a defined strategic period. The targets are communicated at least every year in connection with the annual report or as soon as they are approved by the Board of Directors of poLight and shall not be disclosed elsewhere.
- **Quiet period**
Investor and analyst meetings will, as a main rule, not be held during the 14 last days prior to the publication of financial reports. Furthermore, the authorised spokespersons will not meet with members of the investment community to discuss company financial and/or operational results and outlook. This quiet period includes, but is not limited to, attendance at investor conferences, group meetings and one-on-one meetings. The purpose is to avoid the potential for selective disclosure or its

perception of doing so. During the quiet periods, there will not be any IR-related access to executive directors and senior management.

- **Information on the company's website**

poLight seeks to always comply with the latest version of the "Oslo Stock Exchange Code of Practice for IR" in respect of disclosing information for investors and the market on poLight's website.

5. IR events and arenas

In addition to making information easily available on a timely basis to shareholders and the financial markets, the IR team prioritises raising awareness of, and interest in, poLight and its shares among various market participants - both nationally and internationally. To help promote this goal, the following meetings and presentations shall be held:

Quarterly reporting

Open results presentations shall be held for investors, analysts and other stakeholders. The presentations shall be available via webcast on www.polight.com. Quarterly reports shall be published within 45 days after the end of the quarter. The reporting dates shall be stated in the financial calendar on www.newsweb.no and www.polight.com. As a main rule, the quarterly earnings release shall be made available through Oslo Stock Exchange' channels around 07:00 on the morning of the announcement.

Investor, analyst and press meetings

poLight shall hold regular meetings with investors, analysts and the press. poLight's IR team shall be easily available. Introductory meetings will normally be offered with the IR team, and poLight's management will, as far as possible, be available for follow-up meetings. poLight's ability to provide information to individual market participants, including investors and analysts, is limited by the regulations that apply to listed companies, including the rules on good stock exchange practices, and the general requirement of equal treatment. All presentations used in the meetings will be available on www.polight.com.

Capital markets update

Capital markets update shall be held when appropriate to keep the market up to date on development, strategy and outlook. Capital market updates will be open to all who wish to attend, and the presentations will be made available on www.polight.no.

Conferences, seminars, symposia, etc.

Representatives from poLight's management will participate in various conferences and seminars where relevant. All relevant presentations held by poLight management members will be published on www.polight.com.