

Communication Policy 2026



This policy was adopted by the Board of Directors of Castellum AB (publ) on 29 April 2026.



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1. Introduction

Castellum's Communication Policy sets out principles, allocation of responsibilities and related guidelines to ensure relevant, factual, transparent and accurate communication in accordance with the company's strategy and applicable regulations.

The Communication Policy governs all external and internal communication. All employees of the company are covered by this policy, which creates consistent communication about the company's operations for the benefit of tenants, shareholders and other stakeholders.

2. Principles

Castellum's communication shall be characterised by the following principles.

1.1 Relevant

Castellum's communication is relevant based on the company's operations and ability to act, as well as external events and the company's history.

1.2 Factual

Castellum strives to be factual and communicates based on reliable information in an accessible and simple manner.

1.3 Transparent

Castellum values open and transparent communication and strives to share company information with its stakeholders in a consistent and reliable manner.

1.4 Accurate

Castellum's communication complies with laws and rules applicable to listed companies, as well as the regulations governing financial reporting and the disclosure of material information that may affect investors' decisions.

3. Allocation of Responsibilities

Most employees at Castellum communicate both internally and externally and have personal responsibility for doing so. Below is a description of the roles that primarily hold external communication responsibility.

Chair of the Board

The Chair of the Board comments on corporate governance matters, ownership matters, strategy, board decisions and remuneration, either alone or together with the CEO.

Chief Executive Officer

The CEO is the Group's principal spokesperson on overarching operational matters such as the Group's financial position, strategy, organisation and development matters. At a strategic level, the Chair of the Board may also act as an external spokesperson on these matters.

Chief Financial Officer

The CFO is responsible for Castellum's financial reporting and comments on matters relating to the company's financial reporting and financial position to meet the capital market's need for information about Castellum's operations and development. The CFO is also, with support from the Legal Department, the company's spokesperson towards Nasdaq and supervisory authorities.

Communications Director

The Communications Director is the Group's spokesperson on general matters and coordinates Group-wide media handling. The Communications Director also supports the CEO and CFO in all Group-wide communication and is responsible for the company's external crisis communication and crisis function.

Regional CEO and Business Area Head

Responsibility for operational work in a region or business area also includes the communication aspects of such work. The responsible persons act as spokespersons primarily in trade and local media, as well as in other public contexts, on matters relating to their area of responsibility. Communication responsibility also includes keeping content within their area of responsibility up to date in external channels, for example on the company's website.

Other employees

Other employees may comment on factual matters for which they are responsible; other matters shall be referred to the spokespersons listed above. All employees have the right, as private individuals, to make personal statements, for example on social media. It must be made clear that the views expressed are those of the individual and not of Castellum. Part of an employee's responsibility is to be aware that, in all contexts, including private ones, one may be perceived as a representative of Castellum. This awareness can serve as guidance as to which matters are commented on and in what way.

4. Supporting Documents and Guidelines

Press and Media

Castellum strives for good media relations by continuously providing relevant and newsworthy information, and by being available and answering questions about the company's operations. All media contact is coordinated with the Communications

Department. Further guidelines for press handling are set out in the company document “Procedures for Press and Media”.

Financial Communication

Castellum’s financial communication is governed, among other things, by MAR (the Market Abuse Regulation), Nasdaq’s rulebook and the Swedish Securities Market Act. The purpose of financial communication is to comply with regulations and standards and to create understanding and knowledge of the company’s financial position. Financial communication shall enable a fair valuation of the company and its financial instruments. All regulatory information shall comply with Nasdaq’s rulebook and Castellum’s insider policy.

Brand Platform

All communication is based on Castellum’s brand platform, including its visual identity, tone-of-voice guide and market position.

Privacy

Castellum safeguards personal privacy, and all processing of personal data is carried out in accordance with the General Data Protection Regulation (GDPR) and other data protection legislation. Procedures for publishing images and storing images are handled through the company’s media bank.

Crisis Communication

In the event of a crisis, the crisis policy and the crisis communication plan shall be followed. All media contact in connection with a crisis is coordinated by the Communications Department.

Internal Communication

Each business area is responsible for communicating its matters internally, for example by keeping information up to date and relevant on Castellum’s intranet. Each manager is also responsible for passing on relevant information about strategy, goals and policies to their employees. Instructions on which information and events are to be published internally are set out in the quick guide for the company’s intranet.

As a listed company, Castellum must disclose regulatory and price-sensitive information to all markets in the same manner and at the same time. Castellum strives to communicate internally to employees at the same time on such occasions.

5. Document Owner

Castellum’s Communication Policy is revised once per year and adopted by the Board of Directors. Castellum’s CEO (Pål Ahlsén) is the document owner and is responsible

for the policy. Revisions are prepared by Castellum's Communications Director (Anna-Karin Nyman).