Website Governance Policy

Website Governance Structure, Guidelines and Ways of working with Catella.com

Revisions

DATE:	VERSION, CHANGES MADE AND NAME OF PERSON WHO MADE THEM
2018-10-09	Version 0.1 Created policy, Jonas Burvall
2018-10-31	Version 1.0 Final version after input from stakeholders
2018-11-09	Version 1.1 Updated appendix 1 with new contact persons
2019-09-25	Version 1.2 Updated appendix 1 with new contact persons, Veronica Hjelte

[Date of change]

All questions regarding this policy will be answered by the below contact persons.

Contact persons:

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Head of Group Communications
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Contents

1. Purpose

It is important to define roles, responsibilities and ways of working in order to set a clear web governance structure. This document intends to clarify the most important aspects of this. The document will evolve over time, consider this as the first version covering the most urgent needs.

2. Definitions of roles and responsibilities

The governance structure of Catella.com is based upon four (4) roles, each with its own set of responsibilities and actions.

See a list of all persons and roles in Appendix 1.

2.1 Platform Owner

The Platform Owner is employed by Catella AB and acts as owner of the website. The Platform Owner has the final say in any question regarding the website's content, design, quality, technology and ways of working.

Main responsibilities include:
- Overall responsible for all information being compliant with international laws and regulations.
- Responsible for making sure that no information is sent out, through press releases or other means of distribution, which could result in a breach against listed companies' information disclosure regulations.
- Responsible for setting up processes for personal data handling to ensure compliance with GDPR.
- Overall responsible for the website's quality.
- In charge of the budget and how it is to be distributed.

2.2 Site Manager

The Site Manager is overall responsible for making sure that all Editors and Owners are kept in the loop regarding the website's state and progression. The Site Manager is in constant dialogue with Editors and Owners regarding ongoing activities.

When new functions and standards is to be implemented it is the Site Manager's responsibility to inform all Editors and Owners of how this will affect them and what they are expected to act upon. The Site Manager will at times act as the Platform Owner's spokesperson in matters related to the website.

Main responsibilities include:
- Support and answering questions of any kind related to the website.
- Technical development of the website.

- Making sure the platform that runs the website is up to date.
- Making sure all Owners are informed and kept in the loop about ongoing or future activities related to their section of the website.
- Making sure all Editors have the necessary training and tools to handle day-to-day activities.

2.3   Owner

An Owner is usually a Managing Director for one of Catella's business areas and employed by a local Catella entity.

Main responsibilities include:
- Making sure editors have the time set aside and necessary tools for handling day-to-day activities related to the website.
- Making sure that all information in your section of the website is correct and compliant with national and international laws and regulations.
- Overall responsible for making sure that all content and information in your section is of a good-enough quality.
- Making sure that all information in your section describing the business area's services/offering are in line with Catella AB's guidelines of how business areas are to be described.
- Making sure that no information is published or sent out, through press releases or other means of distribution, before having followed the procedure described in section 4. Press Releases. This is to ensure that no information is made public in a way that could result in a breach against listed companies' information disclosure regulations.

2.4   Editor

An Editor is responsible for the day to day operations related to the website, such as updating content and making sure it is of good-enough quality.

Main responsibilities include:
- Updating web content on a day-to-day basis or when needed.
- Making sure that content is of good-enough quality, i.e. that information is adapted for the web and that everything is spelled correctly.
- Act upon activities or tasks sent out by the Site Manager and/or Platform Owner.

3.   Personal data handling

According to the GDPR legislation, initiated in May 2018, personal data is defined as:

"Any information that relates to an identified or identifiable living individual."

Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.

3.1   Examples of personal data

- Name and surname
- Home address
- Phone number
- Email address
- Identification card number
- Location data (for example the location data function on a mobile phone)
- Internet Protocol (IP) address

3.2   What personal data exists on Catella.com?

The personal data that is handled on Catella's public website is mainly **name and surname**, **phone numbers** and **email addresses** as this is part of the contact pages used for displaying contacts throughout the website.

3.3   Role responsibilities

The Owner is responsible for the personal data, i.e. contact pages, related to your business area and/or country.

If an employee leaves Catella you are responsible for deleting their Contact page and Portrait image from the website.

If you need help deleting this information or finding all places where the information is stored, contact the Site Manager.

Once a year, in the beginning of December, the Site Manager will initiate a review of all personal data stored on the website. All Owners and Editors are then obliged to check if all contacts are still valid and remove those who are not.

4. Press Releases

Press Releases are a key distribution mean making it possible to make information accessible to the whole market at the same time.
Catella Group has a Cision account used for distributing press releases through their global system. If a business area or country wants to publish a press release one of the two methods below shall be chosen and the procedure, described in section 4.3, followed accordingly.

4.1   Distribution through Cision

Catella's public website, Catella.com, is integrated with Cision's distribution system. Press releases sent out through Cision are automatically published on Catella.com.

Sending out press releases through Cision is the preferred way of distribution since the information is made available to the whole market at the exact same time minimizing the risk of any information becoming public before it is supposed to.

When distributing press releases through Cision the procedure described in section 4.3 Procedure for distributing press releases is to be followed.

4.2   Distribution directly on the public website

There is also the possibility to create press releases directly on the website, without using Cision. This way of distribution should follow the same procedure and control mechanisms as when using Cision. Information disclosed by any of Catella's business areas in any country might be considered as regulatory (I.e. affecting Catellas share price on Nasdaq Stockholm).

When distributing press releases directly on the public website the procedure described in section 4.3 Procedure for distributing press releases is to be followed.

4.3   Procedure for distributing press releases

For all Catella Press Releases the following procedure must be followed:

1. Final draft of the Press release is sent to Head of Group Communications at Catella AB for approval

2. Press release is sent out through Cision by Head of Group Communications (if that distribution method is chosen) and automatically published on the public website
OR

2. Press release is published directly on the public website by the local Editor. In these cases the Owner is responsible for the information being published in a correct way and at the right time.

No Press releases should be published directly anywhere on the public website without the Head of Group Communication's knowledge.

If this procedure is not being followed, if the Head of Communications is not consulted and information published on the website that is considered as regulatory and/or affecting the share price the Owner of said business area/country is held accountable for any damage this may cause.

5. Appendix 1.

List of all persons and roles.

Area of responsibility			Owner	Editor
Overall web			Jonas Burvall	Veronica Hjelte
	About Catella Group		Jonas Burvall	Veronica Hjelte
	Newsroom		Jonas Burvall	Veronica Hjelte
	Investor Relations		Jonas Burvall	Niklas Bommelin
	Careers		Jonas Burvall	Veronica Hjelte
	Research		Jonas Burvall	Thomas Beyerle
	Sponsorship / Tennis		Jonas Burvall	Camilla Sjögren
Business Area	Corporate Finance	Nordics	Jesper Bo Hansen	
		Continental Europe	Emmanuel Schreder	Océane Vinson
	Property Investment Management		Timo Nurminen	Veronica Hjelte
	Equity, hedge and fixed income funds		Erik Kjellgren	Sofia Wiklund tjl Johan Hopstadius
Country	Sweden	Corporate Finance	Robert Fonovich	Åsa Lager Maria Burholt Marie Kåhlman
		Funds	Erik Kjellgren	Sofia Wiklund tjl Johan Hopstadius
		Asset Management	Michael Johansson	Elin Abrahamsson
	Finland	Corporate Finance	Antti Louko	Maarit Virtanen
		Asset Management	Jussi Rouhento	
	France	Corporate Finance	Emmanuel Schreder	Océane Vinson
		Asset Management	Alexa Sempiana	Evelyne Jacquot
		Hospitality	Maxime des Monstiers	Oceane Vinson
		Project Management	Thierry Bruneau	Océane Vinson
	Germany	Corporate Finance	Diane Becker	Claudia Kimmel
		Asset Management	Nicolas Hartel	Birgit Wehrmann
		Project Management	Klaus Franken	Ann-Sofie Theisges
		Property Funds/CREAG	Henrik Fillibeck	Birgit Wehrmann
		Property Funds/CRIM	Michael Fink	Lisette van der Ham / Julie Joubert
	Spain	Corporate Finance	Borja Marquez	Gonzalo Cabello de los Cobos
		Asset Management	Javier Hortelano	Elena Sokolova
	Denmark	Corporate Finance	Jesper Bo Hansen	
		Asset Management	William Kanta	

	Norway	Asset Management	Mats Jensen	Mats Jensen
	Netherlands	Asset Management	Timo Nurminen	Julia Mulder
	The Baltics		Aavo Kokk	Ulrica Steen
	United Kingdom		Andrew Smith	Andrew Smith