

**FirstFarms**

Information- and communication policy

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**February 2021**

## 1. Objectives of the communication policy

The main objective of FirstFarms' communication policy is to give the whole company a common basis for all our communication.

Main objectives of FirstFarms' communication efforts:

- *Promote dialogue between FirstFarms and all our stakeholders*
- *Increase current and potential shareholder's knowledge about FirstFarms.*
- *Contribute to creation of a strong FirstFarms' company image.*
- *Strengthen FirstFarms' values and DNA.*
- *Support internal collaboration and knowledge sharing, so the company remains competitive and innovative.*

## 2. Communication principles

Communication activities, as all other activities in FirstFarms, are based on our company's values – Responsibility, Respect, Passion. Therefore, all FirstFarms' communication must:

- **be credible** and a **high quality** because we **take responsibility** of everything we are communicating to our stakeholders.
- **be built on the respect** to all our stakeholders and **encourage dialogue** between us.
- **reflect what we are passionate about.**
- **be clear.** Communication is a two - way process; therefore, it is important to ensure that the shared information is understood.

### Additional principles:

- *Not communicate in a manner which could bring the reputation of FirstFarms into disrepute;*
- *Do not communicate price sensitive information;*
- *Communicate according to GDPR procedures;*
- *Comply with Insider rules;*
- *Comply with applied accounting standards;*
- *If required communicate bilingual.*

### 3. External stakeholders

Who	What	How
<b>Customers and Suppliers</b>	Communication must support an open and effective dialogue with our customers and suppliers, that will encourage collaboration. Professional dialogue with them is intended to build trust in our partnerships. It will give rise to the new innovative solution for the benefits of both partners.	<ul style="list-style-type: none"> <li>✓ Responsible employees' verbal communication.</li> <li>✓ Nonverbal communication in the form of electronically communication.</li> </ul>
<b>Local society</b>	<p>FirstFarms is an agricultural company and some of our operations take place close to living quarters. It is important to us through our communication efforts to create good and collaborative relationship to the local communities.</p> <p>FirstFarms should always ensure, that the local society is informed, if our operations have influence on it. FirstFarms' employees, who are responsible for the communication with the local community should engage in an open dialogue in order to solve disagreements.</p> <p>FirstFarms is a responsible company and its communication efforts to the local society must always promote responsible corporate image.</p>	<ul style="list-style-type: none"> <li>✓ Responsible employees' verbal communication.</li> <li>✓ Nonverbal communication - information booklets, electronically communication, FirstFarms' company Facebook page.</li> </ul>
<b>Other external stakeholders</b>	<p>FirstFarms has a lot of stakeholders, who are interested in the company's operations. Therefore, communication efforts should be targeted to disseminate knowledge about FirstFarms and promote a positive company image among them. Keep the external stakeholders informed and encourage to a dialogue with them is necessary in order to keep stakeholders satisfied.</p> <p>FirstFarms communication efforts should also support recruitment process in order to attract potential skilled candidates.</p>	<ul style="list-style-type: none"> <li>✓ Responsible employees' verbal communication;</li> <li>✓ Investor meetings;</li> <li>✓ Presentations;</li> <li>✓ Communication with journalists;</li> <li>✓ Nonverbal communication - information booklets, electronically communication, FirstFarms' company webpage, LinkedIn, YouTube and Facebook.</li> </ul>

#### 4. Internal stakeholders

Who	What	How
<p><b>Employees</b></p>	<p>FirstFarms' internal communication is intended to effective dissemination of knowledge among our employees and thus strengthen their competences. Internal information needs to be easily accessible. The responsible employees must ensure that the relevant information is shared and discussed.</p> <p>Relevant employees must be informed about new or revised policies and procedures. They need to be shared and discussed. Communication in FirstFarms is two-way process, therefore it is vital that employees are given the opportunity to respond and provide feedback. We believe, that respectful dialogue and cooperation create commitment that helps to make FirstFarms an exciting and attractive workplace.</p> <p>We are an international company with many locations; therefore, it is important that we communicate to coordinate our activities</p> <p>Internal communication must support and promote FirstFarms' values.</p>	<ul style="list-style-type: none"> <li>✓ Responsible employees' verbal communication. Physical and skype/call meetings across functions and locations;</li> <li>✓ Nonverbal communication - FirstFarms employee news, Monthly Management report, electronically communication, FirstFarms' company homepage, LinkedIn, YouTube and Facebook page.</li> </ul>
<p><b>The Board of Directors</b></p>	<p>The Board of Directors must always be well – informed to avoid information asymmetry. Credible and clear information about FirstFarms operations, strategies, goals and results must be distributed to all members of The Board of Directors. Furthermore, they must be provided with documents that require their approval before the information will be distributed for further use. Communication efforts should support trustful and collaborative relationship between the Board of Directors and the Management.</p>	<ul style="list-style-type: none"> <li>✓ Responsible employees' verbal communication. Physical and skype/call meetings.</li> <li>✓ Nonverbal communication – Monthly management reports and other reports, presentations, electronically communication.</li> </ul>
<p><b>Shareholders</b></p>	<p>Communication between FirstFarms and shareholders is a subject of Investor Relation activities. The company has a special function to handle its investor relation</p>	<ul style="list-style-type: none"> <li>✓ Responsible employees' verbal communication;</li> <li>✓ Annual General meetings;</li> </ul>

	<p>activities. These activities are organised with respect to current disclosure requirements and the principle of equal treatment of investors.</p> <p>Communication with company's shareholders is intended to inform them about company's activities and development i.e. to support correct pricing of the company's share and increase the interest for the company's share in the circle of existing shareholders.</p> <p>FirstFarms strives to provide clear and easily accessible information to the shareholders about the company's status, financial development and expectations. FirstFarms should promote the positive company image among the shareholders. It is vital to create dialogue with our shareholders and to get their feedback about company's activities. The Annual General meeting and Shareholder tour support verbal communication to FirstFarms shareholders, where they can receive a deeper insight to the company's operations.</p>	<ul style="list-style-type: none"> <li>✓ Shareholders tours;</li> <li>✓ Information meeting;</li> <li>✓ Nonverbal communication - information booklets, annual and quarterly reports, company announcements, press releases, electronically communication, FirstFarms' company webpage, LinkedIn, YouTube and Facebook.</li> </ul>
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## 5. Methods and means in the information- and communication effort

Communication tool	Content and extent
<i>Verbal</i>	
<b><i>General communication</i></b>	There are different employees who are responsible for communication with company's stakeholders. They communicate according to the FirstFarms' information and communication policy
<b><i>Annual general meeting</i></b>	<p>All shareholders receive an electronically invitation to the Annual general meeting. The company's annual general meeting is an essential, formal tool to inform shareholders about the company's status, financial development and expectations.</p> <p>Report by the Chairman of the Board from the annual general meeting is published on the website immediately after the annual general meeting, i.e. to inform non-attending shareholders and other stakeholders.</p>
<b><i>Information meetings</i></b>	<p>Information meeting in continuation of the company's annual general meeting shall be strongly considered, as such a combination reduces the costs for conducting the meeting and supply the company's shareholders greater knowledge about actual circumstances.</p> <p>It is continuously evaluated, whether FirstFarms shall conduct further information meetings with status for the company and a mention of the development in the company's activities. Information meetings can i.e. be held in connection with presentation of annual- and half year reports. In order to differentiate the information meetings from the company's annual general meeting, the meetings can be held in cooperation with i.e. the agricultural organisations. It should also be considered to invite external speakers to such arrangements. It will attract shareholders, as well as potential investors and contribute to maintain and develop the company's positive reputation with an expected positive interest for participation from i.e. the agricultural press as well as the rest of the press. It will also be an opportunity to build up and cement FirstFarms' status as a company who has knowledge of and contribute to knowledge spreading about agricultural investments in Eastern Europe</p>

<p><b>Shareholder tour</b></p>	<p>Every second year, a tour for the shareholders is arranged to some of the company's agricultural activities. The tour is solely addressed to the shareholders in the company and offers visits at the sites including a longer stay in the area. The tour also includes information about the company's general activities and a more specific information about each activity of the site. The program can be held within a maximum of four days including outward and return journey.</p> <p>Information and offer to participate in the shareholder tours will be communicated through the website and by electronically communication to shareholders. The shareholder tour requires self-payment for the participants.</p> <p>In connection with visit at the company's sites abroad, it is important to clarify which questions can be answered and how they are answered. Thus, a number of specific information about i.e. the operation cannot be informed to shareholders and thereby the public according to FirstFarms' internal rules. The staff involved on the tours must prior be informed about these limitations.</p>
<p><b>Investor meetings</b></p>	<p>Investor meetings are an obvious opportunity to utilise for a smaller listed company, as the knowledge of FirstFarms can be spread this way. By holding investor meetings, the business concept and the vision can be spread to potential investors but also to current shareholders, to get more movement in the share, so it is not "lying dead".</p> <p>By conducting investor meetings, FirstFarms shall ensure that recommendation from Nasdaq is followed not to participate in investor meetings in a determined period prior to financial statements and price-sensitive company announcements. Thus, the company may not conduct – or participate in – investor meetings regarding FirstFarms if the meetings are held within 3 weeks before a publication of one of the mentioned forms announcements (a so-called "quiet period").</p>
<p><b>Presentations</b></p>	<p>The company receives a range of invites to give presentations in various connections for a wide assembled audience. It is the company's policy to handle each invite for a presentation positive with an eye to participate, as it gives opportunity to address a serious and interested audience with information about FirstFarms.</p>
<p><b>Statements</b></p>	<p>Statements, that are provided in connection with arranged tours to FirstFarms' activities abroad, must comply with the internal rules about i.e. internal knowledge cf. above mentioned shareholder tour. The employees involved in these tours, shall</p>

	thus be notified of the boundaries of the statements. The way to speak can be different depending on who is participating in the tours. But internal knowledge and trade secrets must under no circumstances be administered, and the substance of the statements must be according to the guidelines.
<b>Communication with journalists</b>	Journalists from the agricultural press and business journalists from other media can be invited to events in the company. Selected journalists are invited to visit the farms.
<b>Non-verbal</b>	
<b>The annual report</b>	<p>The annual report contains, besides mandatory financial information and figures, review of the company's activities, including specific production conditions, the socio-economic development in the primary investment countries as well as the expectations for the future.</p> <p>The annual report is also published in English, so that more potential investors abroad get opportunity to follow the company. Both the Danish and the English version is electronically available on the company's website.</p>
<b>Quarterly reports</b>	The company issues quarterly report with information of the quarter's accounts and expectations, and in here it is strived that the quarterly reports contain more specific information about production-, yield- and performance conditions at each farm, including a benchmark relative to comparable information
<b>Company announcement</b>	<p>It is the company's policy to issue company announcements, where such are required according to the stock exchange rules, but it will be based on a restrictive interpretation of the requirements. They are published when needed and with a strict interpretation of the regulatory framework for publication.</p> <p>All types of messages are prepared in both Danish and English so investors and business partners in other countries has possibility to follow the company and its activities.</p>
<b>Press releases</b>	Is composed as needed by activities, that do not require company announcement, but which can contribute to positive profiling of FirstFarms.



<p><b><i>Website and electronic communication</i></b></p>	<p>The company's website is an essential communication media. FirstFarms strive thus constantly for updated information on the website, which shall be clear and easily accessible. All company announcements, quarterly reports and other information material shall be available on the website.</p> <p>In addition to the website, the shareholders get opportunity to register with an e-mail address in order to get electronic information. It is the company's policy to communicate electronically with the shareholders. This policy is enforced so all messages including notice to convene annual general meeting will be sent to shareholders in electronic form.</p> <p>A complete English version is composed of the website's content with continuous update and maintenance in accordance to the Danish version.</p>
<p><b><i>Facebook</i></b></p>	<p>Facebook is used to profile the daily life on FirstFarms' sites. It is only allowed to upload information without price-sensitive effect, and the company's Facebook-profile is controlled by administrator employed at the headquarter in Denmark. It is regularly assessed how the profile functions. If it is used by hostile capacities, it will be shut down.</p>
<p><b><i>YouTube</i></b></p>	<p>Is used for posting of relevant company's videos.</p>
<p><b><i>LinkedIn</i></b></p>	<p>LinkedIn is used for posting of relevant company announcements and some job adverts. The LinkedIn profile is controlled by administrator employed at the headquarter in Denmark. It is regularly assessed how the profile functions.</p>

## 6. Contact list to the press

Media	Name	Phone/Mobile number	E mail
Nordjyske Medier	Egon Kjøller <i>Erhverv</i>	T:+45 9935 3316	<a href="mailto:Egon.kjoeller.nielsen@nordjyske.dk">Egon.kjoeller.nielsen@nordjyske.dk</a> <a href="mailto:erhverv@nordjyske.dk">erhverv@nordjyske.dk</a>
Dagbladet Børsen	Bjarne Bang <i>Redaktionen</i>	T:+45 9722 0622	<a href="mailto:Bj.ba@borsen.dk">Bj.ba@borsen.dk</a> <a href="mailto:redaktionen@borsen.dk">redaktionen@borsen.dk</a>
Jyllands-Posten	Lars Attrup <i>Redaktionen</i>	T:+45 8738 3993	<a href="mailto:Lars.attrup@jp.dk">Lars.attrup@jp.dk</a> <a href="mailto:erhverv@jp.dk">erhverv@jp.dk</a> <a href="mailto:jesper.olesen@jp.dk">jesper.olesen@jp.dk</a>
Effektivt Landbrug	Bøje Østerlund <i>Redaktionen</i>	T:+45 6338 2531	<a href="mailto:boje@effektivtlandbrug.dk">boje@effektivtlandbrug.dk</a> <a href="mailto:redaktion@effektivtlandbrug.dk">redaktion@effektivtlandbrug.dk</a>
Maskinbladet	Rasmus Dalsgaard	M:+45 4018 1656	<a href="mailto:rd@fbg.dk">rd@fbg.dk</a> <a href="mailto:redaktion@maskinbladet.dk">redaktion@maskinbladet.dk</a>
Landbrugsavisen	Einar Bo Thomsen  Morten Handrup Frederik Thalbitzer <i>Redaktionen</i>	T:+45 3339 4765/ M:+45 4036 4486 T:+45 3339 4744	<a href="mailto:ebt@landbrugsavisen.dk">ebt@landbrugsavisen.dk</a> <a href="mailto:mha@landbrugsavisen.dk">mha@landbrugsavisen.dk</a> <a href="mailto:lft@landbrugsavisen.dk">lft@landbrugsavisen.dk</a> <a href="mailto:post@landbrugsavisen.dk">post@landbrugsavisen.dk</a>
Vejle Amts Folkeblad	Jesper Sørensen Preben Flindt Bent Sig <i>Redaktionen</i>	T:+45 7641 4946 T:+45 7627 2153	<a href="mailto:jeso@vafo.dk">jeso@vafo.dk</a> <a href="mailto:prfl@jyskemedier.dk">prfl@jyskemedier.dk</a> <a href="mailto:besi@vafo.dk">besi@vafo.dk</a> <a href="mailto:web@vafo.dk">web@vafo.dk</a>
Berlingske	<i>Erhvervsredaktør</i> Linda Overgaard Nyhedsvagt	T:+45 33 75 75 75  T:+45 33 75 22 57	<a href="mailto:liov@berlingske.dk">liov@berlingske.dk</a>  <a href="mailto:businees@berlingske.dk">businees@berlingske.dk</a>
FødevarerWatch			<a href="mailto:fwatch@fwatch.dk">fwatch@fwatch.dk</a>
DR			<a href="mailto:radioavisen@dr.dk">radioavisen@dr.dk</a> <a href="mailto:tva@dr.dk">tva@dr.dk</a>
TV2			<a href="mailto:plan@tv2.dk">plan@tv2.dk</a>
Fyns Amts Avis			<a href="mailto:post@faa.dk">post@faa.dk</a>

Media	Name	Phone/Mobile number	E mail
Fyns Stiftstidende			<a href="mailto:ervherv@fyens.dk">ervherv@fyens.dk</a> <a href="mailto:webred@fyens.dk">webred@fyens.dk</a> <a href="mailto:redaktion@fyens.dk">redaktion@fyens.dk</a>
Grovvarenyt	Helge Lynggaard		<a href="mailto:hl@grovvarenyt.dk">hl@grovvarenyt.dk</a>
Horsens Folkeblad			<a href="mailto:redaktionen@hsfo.dk">redaktionen@hsfo.dk</a>
Maskinstation og Landbrugslederen			<a href="mailto:maskinstationen@post.tele.dk">maskinstationen@post.tele.dk</a>
Politiken			<a href="mailto:erhverv@pol.dk">erhverv@pol.dk</a>
Ritzau			<a href="mailto:ritzau@ritzau.dk">ritzau@ritzau.dk</a>
Skive Folkeblad			<a href="mailto:redaktion@skivefolkeblad.dk">redaktion@skivefolkeblad.dk</a> <a href="mailto:hj@skivefolkeblad.dk">hj@skivefolkeblad.dk</a>
Jyske Vestkysten			<a href="mailto:jydskevestkysten@jv.dk">jydskevestkysten@jv.dk</a>
	Tage Otkjær		<a href="mailto:tage.otkjaer@pol.dk">tage.otkjaer@pol.dk</a>
			<a href="mailto:roskilde.red@sn.dk">roskilde.red@sn.dk</a> <a href="mailto:ringsted.red@sn.dk">ringsted.red@sn.dk</a> <a href="mailto:frederiksborg@sn.dk">frederiksborg@sn.dk</a>
			<a href="mailto:es@landbrugs-nyt.dk">es@landbrugs-nyt.dk</a>
			<a href="mailto:redaktion@landbrugoest.dk">redaktion@landbrugoest.dk</a> <a href="mailto:redaktion@landbrugsyd.dk">redaktion@landbrugsyd.dk</a> <a href="mailto:redaktion@landbrugnord.dk">redaktion@landbrugnord.dk</a> <a href="mailto:redaktion@landbrugfyn.dk">redaktion@landbrugfyn.dk</a>
Herning Folkeblad			<a href="mailto:erhverv@herningfolkeblad.dk">erhverv@herningfolkeblad.dk</a>
			<a href="mailto:ringkoebing@bergske.dk">ringkoebing@bergske.dk</a> <a href="mailto:holstebro@bergske.dk">holstebro@bergske.dk</a>
			<a href="mailto:net@landbrugsmedierne.dk">net@landbrugsmedierne.dk</a>
			<a href="mailto:redaktion@netposten.dk">redaktion@netposten.dk</a>
			<a href="mailto:naestved.red@sn.dk">naestved.red@sn.dk</a>

## 7. Annual calendar for announcements / press releases

Date	Event	Type of message	Responsible	Recipients
<b>March</b>				
	Annual report	Company announcement		OMX, DFSA*), shareholders, stakeholders
<b>April</b>				
	AGM	Company announcement		OMX, DFSA*), shareholders, stakeholders
<b>May</b>				
	Q1	Company announcement		OMX, DFSA*), shareholders, stakeholders
<b>August</b>				
	Q1-Q2	Company announcement		OMX, DFSA*), shareholders, stakeholders
<b>November</b>				
	Q1-Q3	Company announcement		OMX, DFSA*), shareholders, stakeholders

\*) DFSA=Danish Financial Supervisory Authority (DK)

The communication policy comes into force and effects all companies in the FirstFarms group (Appendix 1).

In Billund, on February 2021



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Anders Holger Noergaard

## Appendix 1

### Companies in the FirstFarms group

**FIRSTFARMS A/S**, a Danish joint-stock company, registered with the Trade Registry under the no. CVR 28312504, headquartered in Majsmarken 1, 7190 Billund, Denmark.

**FirstFarms Agra M s.r.o.**, with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 34 122 087, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sro, Insert No. 13205/B, the Slovak republic.

**FirstFarms Mlyn Záhorie a.s.**, with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 34 104 071, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sa, Insert No. 4869/B, the Slovak republic.

**FirstFarms Mast Stupava a.s.**, with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 36 529 401, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sa, Insert No. 2375/B, the Slovak republic.

**FirstFarms s. r. o.**, with its registered seat at Vinohrádok 5741, Malacky 901 01, the Slovak Republic, BIN 35 916 346, registered in the Commercial Register maintained by the District Court Bratislava I, Section Sro, Insert No. 34492/B, the Slovak republic.

**MORAVA AGRO s.r.o.**, with its registered seat at Malé Leváre 469, Malé Leváre 908 74, the Slovak Republic, Id. Nr. (IČO): 35 920 653, registered in the Business register of the District Court Bratislava I., Section Sro, Insert No.: 34880/B, the Slovak Republic.

**Obilná s.r.o.** with its registered seat at Vinohrádok 5741, Malacky 901 01 the Slovak Republic, Id. Nr. (IČO): 54 084 438, registered in the Business register of District Court Bratislava I., Section Sro, Insert No.: 145035/B, the Slovak Republic.

**FirstFarms Gabčíkovo, s.r.o.**, with its registered seat at Patašská 586 Gabčíkovo 930 05, Company ID no.: 35 844 761, registered with Commercial Register of the District Court Trnava Section: Sro, entry no.: 15266/T, the Slovak republic.

**Gabčíkovo City land, s.r.o.** with its registered seat at Patašská 586 Gabčíkovo 930 05, Company ID no.: 36 264 881, registered with Commercial Register of the District Court Trnava Section: Sro, entry no.: 15353/T, the Slovak republic.

**FirstFarms Granero s.r.o.**, with its registered seat at Vlasatice 419, 691 30 Vlasatice, BIN 454 78 295, recorded with the Commercial register maintained by the Regional court Brno, Section C, Insert No. 5080, Czech Republic.

**Dan-Farm Hungary Kft.** with its registered seat at H-5932 Gádos, Tanya 1, recorded with the Commercial register maintained by Bekes Megyei Birsag, Hungary.

**FIRSTFARMS AGRO EAST SRL** with its registered seat at Surdila Greci, Garii Street, no. 1, Braila registered with the Trade Registry under reference number J09/220/2009 Braila, unique registration code (CUI) RO 15104360, Romania.

**FirstFarms SRL**, with its headquarter at Calea Sagului nr. 219, Com. Giroc, Loc. Chisoda 307221, Jud. Timis, registered at ORC J09/349/2012, fiscal code RO 21795228, Romania.

**AIMS SRL**, with its headquarter at Str. Corneliu Coposu, nr. 2, Et. 3, Ap. 21, Jud. Satu Mare, registered at ORC J30/192/2006, fiscal code RO 18429294, Romania.