

Investor Relations Policy

INTRODUCTION

As a public listed company, 5th Planet Games aims to fulfil its obligation to provide relevant information about 5th Planet Games, its management, operations, and financial situation as well as its prospects. This information is directed at its shareholders and stakeholders, as well as the general public. The aim is to fairly and accurately represent 5th Planet Games so that current and potential investors can make properly informed investment decisions, and others can have a balanced understanding of 5th Planet Games and its objectives.

PURPOSE

This Investor Relations Policy (Policy) will:

- Serve as a statement to 5th Planet Games' shareholders and other stakeholders of how 5th Planet Games intends to inform them regarding material developments and maintain effective communications with them.
- Provide a framework of processes and procedures upon which 5th Planet Games can successfully implement its Investor Relations program.

This Policy will apply to the 5th Planet Games' Board of Directors and employees.

The Appendix at the end of this document gives a list of the main types of shareholders and stakeholders.

GENERAL PRINCIPLES

5th Planet Games strives to maintain its corporate credibility and investor confidence by practicing a structured approach to the communication of material information. This should assist in achieving a fair market value for 5th Planet Games' securities – a benefit to both current and potential shareholders.

The Investor Relations program, which is designed to be both proactive and interactive, will be based on 5th Planet Games' commitment to:

- Always report its financial results and material developments to the Stock Exchange, its shareholders, and other stakeholders in a timely, open and comprehensive manner.
- Communicate only through its designated spokespersons.
- Proactively address reports and rumors, so as to avoid unnecessary speculation in its securities. However, 5th Planet Games will only deny false rumors in material situations.
- Being flexible and give reasonable access to analysts and the media to help them have informed evaluations of 5th Planet Games.
- Meet with its major shareholders at least annually as part of our ongoing program to inform and obtain feedback on 5th Planet Games.
- Use our website as an additional primary communications channel.

COMMUNICATIONS COMMITMENTS

5th Planet Games will make every effort to ensure that all material information concerning 5th Planet Games is made as freely and widely available as possible. 5th Planet Games encourages an exchange of opinion between itself and its principal stakeholders and will organize its communications to facilitate that dialogue.

5th Planet Games' communication will be characterized by the following attributes:

- **Transparency:** material information will be released, whether it is favorable or not, in a balanced and fair manner that is not misleading.
- **Consistency:** all stakeholders will receive the same information, only formats may differ depending on the audience and forum.
- **Accuracy:** information will be complete and accurate when released and any material errors will be immediately corrected and clarified.
- **Timeliness:** material information will be released as soon as it is known unless there are exceptional legitimate reasons to withhold.
- **Non-selective:** equal access to material information will be achieved through broad public dissemination.

SPOKESPERSONS

5th Planet Games has a well-defined structure for governance and management which provides specific authority and responsibility for Policy implementation. The designated Primary Spokespersons are:

- Chairman of the Board
- Chief Executive Officer

Primary spokespersons may communicate with all audience constituents, providing information, data and analysis and responding to questions concerning all aspects of 5th Planet Games' operations and financial condition, its prospects and its strategies. They may also discuss matters relating to 5th Planet Games' governance and management, as well as its products and services, and initiatives.

The Secondary Spokespersons will include Chief Financial Officer and Chief Operating Officer. Secondary Spokespersons may communicate only in connection with their specific areas of responsibility within 5th Planet Games, and as authorized by a Primary Spokesperson. No other individuals may act as spokespersons for the 5th Planet Games.

MATERIAL INFORMATION

5th Planet Games will always fully comply with its disclosure obligations as codified in the Listing Requirements of the Oslo Stock Exchange. The Appendix at the end of this document gives a description of the main elements which comprise material information.

In determining materiality, 5th Planet Games will assess the likely effect of the information on the price of 5th Planet Games' securities, which would also include a determination of whether the circumstances or events are measurable and trigger the materiality thresholds in the Exchange's methods for percentage ratio calculation.

Typically, material information concerning 5th Planet Games provided in written or oral communications would include:

- Reports and documents provided to the Stock Exchange and other regulators.
- Materials and statements in 5th Planet Games' Annual Reports, quarterly reports, press releases, letters and circulars to shareholders.
- Management presentations on behalf of 5th Planet Games.
- Information on 5th Planet Games' websites.
- Articles concerning 5th Planet Games.
- Correspondence and e-mails.
- Verbal statements made to outside parties in meetings, briefings, press conferences, or during telephone conversations.
- Interviews with the media.
- Speeches given on behalf of 5th Planet Games.

CONFIDENTIAL INFORMATION

In general, all information regarding 5th Planet Games, its operations, financial condition, and future prospects, should be regarded as material and price-sensitive, and must be treated as confidential unless it is already in the public domain.

Employees and Third Parties, such as 5th Planet Games' auditors, bankers, lawyers, or other professional advisors who require such information to properly execute their duties, are to protect the confidentiality of such information.

Leakage and Accidental Disclosure. In the event of an information leakage, or the accidental disclosure of unpublished material information, the situation will be addressed in line with 5th Planet Games' chain of authority and responsibility. If deemed necessary, 5th Planet Games will make an appropriate announcement to the Stock Exchange as soon as practicably possible, which may be followed by a press release and/or other communication modes.

DISCLOSURE PROCESS

5th Planet Games will take the following steps in announcing material information:

Step 1: Approval is given for release of material information in line with the chain of authority and responsibility, hereunder Management team and Board of Directors.

Step 2: On the same day, after market closure, an announcement is made to the Exchange. If 5th Planet Games chooses to disseminate the information during trading hours, the Exchange may be requested to temporarily suspend trading in 5th Planet Games' securities.

Step 3: The press release, and any new presentation materials produced for a press conference or briefing, are posted on 5th Planet Games' website, and e-mail copies are dispatched to persons on the 5th Planet Games' mailing list.

REPORTS AND EVENTS

Quarterly Financial Reports.

The Quarterly Financial Reports will be issued to the Stock Exchange and uploaded to the Stock Exchange's website on the day of approval by the Board, in the format required by the Stock Exchange. Thereafter, a copy of the Quarterly Report will be posted on 5th Planet Games' website, and e-mail copies will be dispatched to relevant parties on 5th Planet Games' mailing list.

Annual Report.

Once the Annual Report is approved by the board of directors, the report will be published and distributed on 5th Planet Games' website as well as being made available on the Stock Exchange. The complete Annual Report in a printed format will also be delivered to all persons who notify 5th Planet Games that they would like to receive the full report.

The Annual General Meeting.

Notice of the Annual General Meeting will be announced on the Stock Exchange as well as on 5th Planet Games' website and will be in compliance with the Listing Requirements of the Stock Exchange. The Annual General Meeting is an important forum that provides an opportunity for shareholders to engage with the Board and senior management as well as to gain a better understanding of 5th Planet Games' operations and business. 5th Planet Games will endeavor to provide shareholders with all relevant information, which may include written answers delivered subsequent to the meeting. Any new presentation materials from the Annual General Meeting will be available on the 5th Planet Games' website.

Briefings and Press Conferences.

Briefings and Press Conferences are normally held in conjunction with the announcement of 5th Planet Games' fiscal quarter-year and full year financial results, and the announcement of major corporate developments. Primary Spokespersons will conduct the press conference/briefing, with assistance from Secondary Spokespersons where necessary. 5th Planet Games will issue invitations to as wide an audience as possible, and the briefing and press conference will normally take place at 5th Planet Games' Office or by an online investor call.

Meetings and Interviews with Investors, Analysts, and the Media.

As part of 5th Planet Games' Investor Relations program, meetings and interviews are conducted on a regular basis with investors and analysts. In addition, overseas conferences and roadshows can be attended to meet fund managers and analysts. On all these occasions, care will be taken to ensure only information already in the public domain is discussed.

MAJOR CORPORATE DEVELOPMENTS

5th Planet Games will strictly enforce its procedures for the protection of confidentiality until such time as the development of any major corporate development, such as a merger or acquisition or the launch of a significant new business or product, has received all requisite approvals. Thereafter, special attention will be paid to ensure the widest and most complete dissemination of information concerning the development, in line with the provisions of this Policy and the Listing Requirements of the Stock Exchange.

ANALYSTS' REPORTS AND RUMOURS

Analysts' Reports.

5th Planet Games' policy is to offer only verbal guidance when requested by analysts and to point out factual errors or assumptions which are inconsistent with previously announced information. However, it will make reasonable forecasts or recommendations, opinions, and conclusions of an analyst available online. 5th Planet Games will not endorse any analyst's report but will circulate any analyst's report or make such report available to any outside party as well as internally to assist in understanding how the market and outsiders view 5th Planet Games.

Rumors.

5th Planet Games will not respond to rumors unless they appear to contain material information or may be expected to affect the price of the 5th Planet Games' securities or trading activity in those securities. When a report or rumor about 5th Planet Games contains material errors, 5th Planet Games will issue an announcement to the Stock Exchange in order to deny or clarify the report or rumor. In general, 5th Planet Games will take a proactive approach to the addressing of reports and rumors, so as to minimize uninformed speculation and promote an orderly market in its securities.

FORWARD-LOOKING INFORMATION & COMMENT

A forward-looking comment may be given in the Quarterly Report and included in a subsequent press release or briefing. 5th Planet Games will not normally provide any forecast of its future financial results but may provide comments on its prospects, as well as on the likelihood of meeting any publicized targets, such as key performance indicators. Any forward-looking information or comment will be clearly qualified by a disclaimer or guidance not to rely on the data. If 5th Planet Games detects a significant variation between actual financial data and the forward-looking information previously provided, it will, after due consideration, issue a clarifying announcement to prevent misleading the market.

ADOPTION OF POLICY

This Policy was adopted by 5th Planet Games' Board of Directors on 29 March 2023. It is subject to annual review after which amendments may be made and approved by the Board. This Policy will be published on 5th Planet Games' website.

CONTACT DETAILS

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APPENDIX.

A. TYPES OF AUDIENCE

The audience 5th Planet Games is diverse but will include the following:

- Shareholders and prospective investors.
- Analysts, fund managers and investment bankers
- The financial press and other media
- Government and regulators
- Business partners and service providers.

B. TYPES OF MATERIAL INFORMATION

Material information is any information about 5th Planet Games which might reasonably be expected to have a material effect on:

- The market price or value of 5th Planet Games' securities, or activity in the trading of its securities; or
- A decision to buy, sell or continue holding 5th Planet Games' securities which is made by an existing holder of those securities, or someone considering an investment in those securities.

The following gives a general description of matters which would be regarded as material information. This list is not exhaustive and is for guidance purposes only.

- Any change in shareholders which might affect control of 5th Planet Games.
- Any new issue of securities by 5th Planet Games, or in the terms of its existing securities.
- Any information concerning dividends.
- Any reorganisation or reconstruction of 5th Planet Games.
- Material litigation and court decisions.
- Mergers, acquisitions and other major corporate developments.
- Significant borrowings and any ratings attached to those borrowings.
- Any event of default in respect of a material financial obligation of 5th Planet Games.
- The acquisition or loss of any material contract.
- Material new products.
- Material changes in 5th Planet Games' business or its strategy or investment plans.
- Other events that may be expected to have a material effect on 5th Planet Games' operations, financial condition or future prospects.
- Quarterly Reports of interim financial results, and 5th Planet Games' annual audited accounts.