

# WithSecure Disclosure Policy

## 1. Purpose

This Disclosure Policy describes the principles and procedures applicable to WithSecure's external communications to the financial markets.

WithSecure's financial instruments are listed in Nasdaq Helsinki Ltd. In its communication, WithSecure complies with Finnish and EU legislation, the regulations and guidance of European and Finnish Financial Supervisory Authorities, Finnish Corporate Governance Code as well as its internal policies.

The goal of WithSecure's external communications is to ensure that relevant and accurate information about the company is disclosed to the financial markets in a timely manner and non-selectively to all participants. WithSecure strives to provide good service and to meet actively with capital market representatives.

This Disclosure Policy has been approved by the Board of Directors on 12 May 2022.

## 2. Communications Principles

### Spokespeople

WithSecure's financial situation and performance, its markets as a whole and its future outlook are commented on by WithSecure's CEO and the CFO or a person designated by them. Investor Relations centrally handles the communications with investors and analysts.

### Discussions and Meetings

WithSecure actively engages with representatives of capital markets and the media, replying to queries by investors, analysts and the media without unnecessary delay. Discussions are always based on information already made available to the markets. Investor Relations coordinates communication with investors and analysts, whereas meetings with the media are coordinated by corporate communications.

### Channels

WithSecure publishes stock exchange releases via the Helsinki Stock Exchange and main media channels and distributes press releases to the media. Stock exchange releases and investor news are made available on the Investor Relations section of the company's website as soon as they are published.

### Availability

All WithSecure's stock exchange releases can be found from the website for at least five (5) years from the date of the publication. Financial statements, Board of Directors' reports, auditors' reports, statements of non-financial information, half year reports, interim reports, remuneration reports and corporate governance statements are available at the website at least for ten (10) years.

### Language

The official reporting language of WithSecure is Finnish, but the company publishes all stock exchange releases also in English. Some of the materials used at investor events are available only in English.

### Silent Period

WithSecure observes at least a three-week (21 days) silent period prior to publication of financial reports, during which it refrains from engaging in discussions with capital market representatives or the media regarding WithSecure's financial position or the factors affecting it.

## 3. Releases Published by WithSecure

### Stock Exchange Releases

#### **Financial reporting and other periodic reporting**

WithSecure publishes its financial reports according to a predetermined schedule: two interim reports, a half year report and a financial statements release. Auditors' report shall be disclosed together with the financial statements. Furthermore, WithSecure publishes annually a statement on corporate governance and non-financial information. A remuneration report is published as part of the corporate governance statement.

The publication dates for financial reports are announced prior to the end of the previous financial period.

#### **Ongoing reporting**

##### Inside information

WithSecure publishes a stock exchange release as soon as possible of any inside information concerning WithSecure. Inside information means information of a precise nature, which has not been made public, relating, directly or indirectly, to WithSecure and which would be likely to have a significant effect on the price of WithSecure financial instruments (definition of EU Market Abuse Regulation, MAR). What constitutes inside information is analyzed case by case based on relevant facts and circumstances. Inside information may not be disclosed to analysts, journalists, or any other parties (except in certain situations specified in MAR), either individually or in groups, without making the same information public to the market.

WithSecure may justifiably delay the disclosure of inside information under the following conditions:

- Immediate publication is likely to prejudice the legitimate interests of WithSecure,
- Delay of disclosure is not likely to mislead the public, and
- The confidentiality of the information can be ensured.

The decision to delay the disclosure is always made in accordance with the regulatory requirements and WithSecure's Insider Policy (as in force from time to time). The decision can be made by the authorized persons only and it will be documented and archived accordingly. The information shall be published as a stock exchange release as soon as possible after the conditions of delaying the disclosure are not met anymore.

##### Other regulatory stock exchange releases

Stock exchange releases are also used to publish regulated information that is required to be disclosed (such as management transactions, changes in the number of own shares, flagging notifications etc).

WithSecure publishes a stock exchange release of changes in the members of the Board of Directors, Auditors as well as changes in the CEO and CFO positions. Changes in other senior management positions may also be disclosed, should WithSecure case by case evaluate this relevant.

##### Rumors and information leaks

WithSecure does not typically comment on market rumors. However, if a market rumor significantly impacts the company's stock price, the company may consider issuing a statement in order to provide accurate information to the markets or to rectify incorrect or misleading information.

In certain situations, a rumor may explicitly relate to inside information which has not yet been made public (delayed disclosure). If the rumor is sufficiently accurate to indicate that the confidentiality of that information is no longer ensured, inside information is disclosed to the markets as soon as possible.

##### Outlook and profit warnings

WithSecure may release forecasts on the group's likely future financial performance (outlook). Outlook is based on views at the time of the release regarding the development of the group and its business operations.

WithSecure constantly monitors the company's financial performance, position and outlook. In the event that WithSecure's financial position or outlook deviates in an unexpected and significant positive or negative way

from what has been previously published. WithSecure will publish a profit warning as a stock exchange release as soon as possible.

#### Press releases and investor news

Press releases are used to announce matters which do not meet the criteria for stock exchange releases but are deemed to be of value as news items. Such matters may include smaller acquisitions, investments, divestments or financial arrangements, sales contracts related to the normal scope of business as well as partnership agreements. Press releases can be published globally or regionally, and they are also typically published on WithSecure's website.

Investor news are published on the Investor Relations section of the company's website and distributed to the main media outlets and are typically related to invitations to quarterly result info sessions as well as other investor-focused events (such as the CMD).

## 4. Changes to the Disclosure Policy

This policy will be revised and amended as necessary. WithSecure may also adopt more detailed internal guidelines and processes to ensure compliance with this policy and relevant laws and regulations.