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Sampo Group's Disclosure and Communication Policy

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Sampo Group's Disclosure and Communication Policy

Background and goals

Sampo Group is an insurance group with operations across the Nordic and Baltic countries and the UK. The A shares of Sampo Group's parent company, Sampo plc, and financial instruments issued by the parent company and its subsidiaries are listed on the Nasdaq Helsinki and a few other exchanges. In its Disclosure and Communication policy, Sampo Group complies with the relevant domestic and European Union regulations, such as the Market Abuse Regulation (No 596/2014), as well as the rules of Nasdaq Helsinki and, when applicable, the rules of other stock exchanges. Sampo plc's subsidiary Topdanmark, listed in Nasdaq Copenhagen, complies with the Danish law and regulations in force.

This Disclosure and Communication Policy, approved by Sampo plc's Board of Directors, describes the key principles and procedures according to which Sampo plc and its fully owned subsidiaries communicate with all stakeholders, including shareholders and other capital market participants, media and employees. Unless otherwise stated, 'Sampo' shall hereafter refer to the entire Sampo Group.

Sampo plc's Board of Directors has separately approved a Reporting Policy which deals with information Sampo is required to submit to the supervisory authorities.

Main disclosure principles

Sampo's goal is to produce accurate, essential, coherent, sufficient and up-to-date information about the development, strategy and financial position of its businesses. Sampo consistently handles the positive and negative aspects of its operations and publishes its stock exchange releases without undue delay and makes them simultaneously available to all its stakeholders.

Organisation and responsibilities

Capital markets communication

The dissemination of information that may impact the price or perception of Sampo's financial instruments is the responsibility of Sampo plc's Investor Relations unit (IR unit), which also manages communication with the capital markets. The Head of Investor Relations reports to the Group CFO. Investor communication policies are the responsibility of the Group CEO, the Group CFO and the Head of IR. Experts and members of subsidiary management also take part in communications and investor meetings as required.

Sampo plc's official reporting language of communication is Finnish but the company publishes all official material in Finnish and in English. Material can also be published in Swedish and some of the IR material is published in English only due to the international nature of the communication with the capital markets. The releases include the contact information of the person who provides further information on the matter in question.

Communication in the subsidiaries

Sampo Group companies regularly engage in communication activities targeted at numerous stakeholder groups outside the capital markets, including existing and prospective customers as well as existing and prospective employees. Such communication is subject to the minimum standards laid out in this document. Sampo subsidiaries should have policies in place to promote clear and accurate communication with relevant stakeholders. Protecting the Group's brands, reputation, company information and confidential information about customers and partners must always be priority in all communication.

Subsidiary business area heads may give comments to the media on matters concerning daily business operation, where they support the interests of the company and the Group. Other appointed representatives of the company and relevant experts can also give statements in the name of the company, when authorised by executive management, Head of Business Area, Head of Communication unit or other person authorised by him and co-ordinated with the subsidiary-level Communications unit.

In case such statements may have an impact on the price of the financial instruments issued by Sampo, the Communications unit must consult with Sampo's Investor Relations unit. In uncertain cases Sampo IR and Legal unit should be contacted.

Communication channels

Stock exchange releases and press releases

Stock exchange releases are published simultaneously on the relevant stock exchanges and on the company's website at www.sampo.com. They are also distributed to key media and to subscribers of Sampo's releases. The IR unit is responsible for the publication of the releases. If a strong rationale exists, the publication can also be made by a partner.

The company can also publish press releases on matters that do not meet the requirements specified in the stock exchange release, but which are considered to be newsworthy, or which are otherwise estimated to be of interest to the company's stakeholders. Subscriptions for the releases can be made at the company's website.

Press releases of the subsidiaries are published by communication units of the Group companies or authorised partners.

Company website

Sampo's website (www.sampo.com) is the most important channel for communicating and accessing the latest Group level information. Sampo plc's releases are available on the website for at least ten years after publication. Nasdaq Helsinki is responsible for archiving the stock exchange releases in the Central Storage Facility.

Key material presented at investor and analyst events and in result releases is available on Sampo's website www.sampo.com.

Social media

Social media plays an important role in Sampo's communication with its stakeholders such as investors, journalists, cooperation partners and employees. Hence, the Group companies should have clear and comprehensive social media policies that facilitate positive social media engagement and protect the Group's brands, reputation and confidential information.

Official social media accounts are accounts set up by Sampo's IR unit and/or communication and HR units of the subsidiaries. These should be managed and administered by professionals with appropriate skills and training and a strong knowledge of Sampo's and relevant Group companies' disclosure policies and practises. The activities on official social media accounts must be aligned with the Group's official policies and positions at all times.

Sampo's disclosure and communication policy does not, in any way, restrict individual employees' right to freedom of speech in their personal social media activities. Employees are encouraged to engage in social media activities where there is possibility to show expertise and pride in their work in Sampo or one of the Group companies. However, employees are required to protect the Group's brands, reputation, company information and confidential information on customers and cooperation partners in their personal social media activities in the same way as in any other form of communication. Personal statements, particularly those involving

potentially sensitive topics, including, but not exclusive to, politics and religion, should clearly be attributed to the individual employee making these, to ensure that they are not interpreted as official company positions.

If a strong rationale exists, the publication of the company's social media postings can also be made by a cooperation partner.

Analyst, Investor and Media Meetings

Sampo management and IR actively meet with capital market representatives either virtually or face-to-face. The importance of virtual events has increased over recent years and many of IR events such as Capital Markets Day can be organized either virtually or as hybrid meetings. Live conference calls with analysts and investors are arranged on a quarterly basis and are available at www.sampo.com. The key topics discussed at these events have been published earlier.

Reports under the regular disclosure obligation

The publishing dates for the reports under regular disclosure obligation are announced in a stock exchange release prior to the start of each financial year. The schedule is also available online at www.sampo.com.

The reporting takes into account the special features of Sampo's operations, industry practices and investor expectations. Sampo plc publishes the following financial reports which describe the company's business operations and financial performance. The Financial Statement Release covers the company's annual result and the Half-Year Financial Report is drawn up for the first six months of the year. The first and third quarter Interim Statements are published in an abbreviated form.

Sampo plc publishes the Financial Statements and the Board of Directors' Report in accordance with relevant legislation, regulations and other guidelines. Sampo's Consolidated Financial Statements are drawn up in accordance with the International Financial Reporting Standards (IFRS) applying all the standards and interpretations relating to its business, adopted by European Commission and effective at the reporting date. Financial Statements are published no later than four weeks before the company's Annual General Meeting. In addition, Sampo annually publishes a Risk Management Report and a Sustainability Report.

The financial statements, the Board of Director's Report and the other aforementioned reports are published at www.sampo.com. Publication of the reports are communicated in a stock exchange release. Sampo's Annual Report archive is available at www.sampo.com/annualreportarchive.

In accordance with the recommendation of the Finnish Corporate Governance Code 2020, effective as of 1 January 2020, and the stipulations in the Securities Markets Act, Sampo publishes annually a Corporate Governance Statement for the previous year on its website. The Corporate Governance Statement is drawn up separately from the Board of Directors' Report. In addition, the Remuneration Report for Governing Bodies prescribed by the Corporate Governance Code is also available on the company's website, as is other material prescribed

by the Code. Sampo may also engage in other forms of communication regarding corporate governance issues.

Sampo publishes annually a Solvency and Financial Condition Report (SFCR) in accordance with Solvency II rules. This document covers at least Group level solvency issues and in addition information on e.g. business and performance, system of governance and risk profile.

Public disclosure of inside information

Sampo will, as soon as possible, publicly disclose non-public, precise information directly concerning Sampo or its financial instruments which, if it were made public, would be likely to have a significant effect on the prices of financial instruments issued by Sampo (inside information). The release will always indicate that the disclosure relates to inside information.

Under the conditions laid down in Article 17 of the Market Abuse Regulation (No 596/2014), the disclosure can, however, be delayed on the company's own responsibility. The Sampo Board has authorised the Chair of the Board, Group CEO or Group CFO to make the decision to delay the publication of inside information in accordance with Article 17 of the Market Abuse Regulation.

Other stock exchange communications

Sampo plc publishes, without undue delay, stock exchange releases that contain all of the decisions made by the Annual General Meeting and by the Board of Directors concerning the financial statements, share issues, the distribution of dividends, essential changes to the operations and the organisation of the issuer, key appointments and substantial business transactions, provided that they, according to the company's assessment, can have a significant impact on price of the financial instruments issued by Sampo or which should be, on the basis of existing regulations, communicated. The releases are submitted to the Nasdaq Helsinki, other essential stock exchanges, Finnish FSA and to principal media as well to those who subscribe to Sampo's releases.

Special issues

Rumours, leaks and market views

Sampo does not comment on market rumours or on its or other companies' stock prices. The company also does not take a stand on its owners or on the plans and actions of individual owners. When the rumour explicitly relates to inside information the disclosure of which has been delayed and the rumour is sufficiently accurate to indicate that the confidentiality of the inside information is no longer ensured, Sampo will disclose the information as soon as possible.

The company reacts to any groundless rumour in the market publicly and without delay if the rumour affects or is likely to affect the price of the financial instruments issued by Sampo.

Sampo does not comment on the views of individual analysts or on views presented in the market, nor does it draw up consensus estimates. Sampo plc's website includes a link to consensus estimates maintained by a third party, but Sampo bears no responsibility for the accuracy or timeliness of the estimates, nor does the content represent opinions, forecasts or other assessments of Sampo or its management.

In case confidential and essential information falls into the hands of someone who is not, by virtue of the regulations concerning insiders or other rules, authorised to receive such information, Sampo shall as soon as possible make the information public, in compliance with normal disclosure procedures.

Silent period

Sampo observes a 30-day silent period prior to periodic reporting in its contacts with investors and the media. This means that the company refrains from engaging in discussions with capital market representatives or the media regarding Sampo's results or the factors affecting it during the 30 days preceding the publication of the Financial Statement Release, Half-Year Financial Report or an Interim Statement.

Outlook

Sampo publishes an assessment of the Group's probable future development in the Board of Directors' Report and its reports under the regular disclosure obligation. Due to the special nature of its business, Sampo does not prepare profit forecasts, but instead describes its outlook and the related risks in more general terms (general outlook). The general outlook is assessed at the Group level and, unless otherwise stated, it concerns the remainder of the calendar year.

In addition, the outlook may include key performance metrics related to business performance at group-level, or within certain group companies or business segments. In connection with the assessment of future development, the company also presents key risks and factors causing uncertainty which may influence the company's business development.

Statements and assessments are based on management's current insight into the development of the Group and its operations. Outside of the reports no assessments of the future are given to any party.

Profit warning

Sampo plc issues a profit warning if it appears that the company's development during the reporting period will deviate from assessments that have previously been issued publicly and from what can be justifiably concluded based on previously published information. The decision on issuing a profit warning is made by the Board of Directors or the Group CEO.

Market expectations are not a ground for issuing a profit warning. If, however, market expectations differ substantially from the future outlook publicly announced by the company, or if a more precise outlook has not been given, the company will consider redefining its outlook in a stock exchange release.

Share buybacks

Sampo shall report repurchases of its own shares to a regulated market operator in accordance with the provisions of the Market Abuse Regulation (No 596/2014) and the rules of Nasdaq Helsinki and other marketplaces, if applicable. The information is also published at www.sampo.com.

Flagging notifications

Changes in ownership are announced in accordance with the Securities Markets Act.

Managers' transactions

In accordance with Article 19 of the Market Abuse Regulation persons discharging managerial responsibilities at Sampo and persons closely associated with them are obliged to notify Sampo and the Finnish FSA of transactions conducted in Sampo shares, debt instruments issued by Sampo or any other financial instruments related to the said instruments within three business days after the date of the transaction by email to transactions@sampo.fi. Sampo will publish the notifications as stock exchange releases within two business days after receiving the notification.

Market soundings

Rules and procedures have been established to ensure that the requirements laid down in the Market Abuse Regulation (No 596/2014) are followed regarding market soundings.

Crisis communication and correcting of false information

Sampo has made preparations for exceptional situations concerning its communications by instructing its personnel accordingly. Sampo plc has a continuity plan in place to which a separate crisis communications plan has been appended. The subsidiaries are also required to have relevant continuity plans and respective communication plans. The plan outlines how to proceed in for example situations where a serious information leak disrupts the company's normal operations.


In case information that has been published by Sampo is later discovered to be erroneous, incomplete or misleading and is considered to have major significance to investors, the information shall be corrected, or the missing information provided immediately. The information shall be published in the same way as the original information was published.


If necessary, the Group CEO or someone authorised by him shall provide additional instructions on implementing this Disclosure and Communication Policy. In individual cases and for compelling reasons, the Group CEO is entitled to deviate from the Disclosure and Communication Policy within the framework of the applicable law and regulations.


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