

Insider Policy

Applicable to all Sampo Group employees, including the Group CEO as well as the Board of Directors of Sampo plc, and as appropriate, the general public.

17 June 2026



Table of contents

1. Purpose and Scope	3
2. Key concepts and principles	4
2.1 Inside information	4
<i>Precise information</i>	4
<i>Significant information</i>	4
<i>Non-public information</i>	4
2.2 Financial Instruments	5
2.3 Prohibited use and disclosure of inside information	5
2.4 Sampo Group Insiders	6
2.4.1 Managers	6
2.4.2 Restricted Persons	7
2.4.3 Project-specific Insiders	7
3. Trading and trading restrictions	7
3.1 Trading in Sampo Group's Financial Instruments	7
3.2 Closed Window for Managers and Restricted Persons	8
3.3 Trading restrictions for Project-specific Insiders	8
3.4 Trading Restrictions for Financial Investments	8
4. Managers' and closely associated persons' notification obligation	9
4.1 Managers' notification obligation	9
4.2 Closely Associated Persons' notification obligation	10
5. Insider lists	10
5.1 Establishing a project-specific insider list	10
5.2 Persons recorded in a project-specific insider list	11
6. Supervision and sanctions	12
6.1 Supervision of insider matters	12
6.2 Administrative sanctions	12
6.3 Criminal sanctions	12
6.4 Employment related sanctions	12
6.5 Whistle-blowing	13
7. Definitions	13
8. Implementation and compliance	14
9. Review and updating of the Policy	14

Insider Policy

1 Purpose and Scope

The purpose of this Sampo Group Insider Policy ("the Insider Policy") is to ensure Sampo Group's compliance with applicable legislation and regulatory framework, including:

- Market Abuse Regulation (596/2014/EU, as amended, "MAR")¹;
- Market Abuse Directive (2014/57/EU, as amended, "MAD II")²;
- Commission Delegated Regulation (2016/522/EU, as amended, "CDR")³,
- Commission Implementing Regulation (2016/347/EU and 2016/523/EU, as amended),
- Finnish legislation, especially Chapter 51 of Criminal Code (39/1889) and Securities Markets Act (746/2012, as amended, "Securities Markets Act"); and
- applicable rules and issuer obligations of Nasdaq Helsinki Ltd, Nasdaq Stockholm AB and Nasdaq Copenhagen A/S as in force from time to time.

This Insider Policy establishes group-wide framework for identification, handling and safeguarding inside information, the prohibition on its use, trading restrictions, notification and disclosure obligations and the maintenance of insider lists. This Insider Policy also applies, as appropriate, to Group Companies if any Group Company acts as an issuer within the meaning of MAR. Furthermore, this Insider Policy governs the treatment of Sampo Group's confidential information, and the prevention of its misuse.

This Insider Policy is binding on all persons employed by Sampo Group, including the Group CEO and other executives, and Sampo plc's Board of Directors. For Group Companies registered outside Finland, national legislation and regulatory requirements of the relevant jurisdiction apply. Where required by national legislation, the management of the relevant Group Company must ensure that supplementary insider and trading rules are adopted.

1) Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC and 2004/72/EC (Text with EEA relevance).

2) Directive 2014/57/EU of the European Parliament and of the Council of 16 April 2014 on criminal sanctions for market abuse (market abuse directive).

3) Commission Delegated Regulation (EU) 2016/522 of 17 December 2015 supplementing Regulation (EU) No 596/2014 of the European Parliament and of the Council as regards an exemption for certain third countries public bodies and central banks, the indicators of market manipulation, the disclosure thresholds, the competent authority for notifications of delays, the permission for trading during closed periods and types of notifiable managers' transactions.

Each insider or person receiving inside information is personally responsible for complying with the laws and regulations in force from time to time as well as with this Insider Policy.

Further information regarding this Insider Policy can be received from the Sampo Group's person in charge of insider matters, Tiina Halmesmäki (the "Insider Responsible") and the Sampo Group Insider Administration, (the "Insider Administration").

Nasdaq Helsinki's Guidelines for Insiders are available here:

[Nasdaq Helsinki – Guidelines for Insiders](#).

2 Key concepts and principles

2.1 Inside information

Inside information means information of a precise nature which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments admitted to trading on a regulated market or on a multilateral or organised trading facility, and which, if made public, would be likely to have a significant effect on the prices of the said financial instruments or on the prices of related derivative financial instruments.

Precise information

Information is deemed to be of a precise nature:

- if it indicates a set of circumstances which exists or which may reasonably be expected to come into existence, or an event which has occurred or which may reasonably be expected to occur, and
- where it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the financial instruments or the related derivative financial instrument.

The precise nature of the information does not require the occurrence of the event or set of circumstances to be certain or to have a high probability of occurring. In order for the precise nature of the information to be fulfilled, it is sufficient that there is a real possibility, objectively assessed, for the set of circumstances or event to occur. Furthermore, the precise nature of the information does not require that the direction of the possible price effect be foreseeable on the basis of the information.

Significant information

Information is deemed significant, if a reasonable investor would be likely to use it as part of the basis of their investment decisions.

Non-public information

Information is deemed to become public when a company announcement covering that information has been submitted to Nasdaq Helsinki Ltd, and, as applicable, to other exchanges,

and released to the central media, or when the information has been made generally available to the markets, for example through electronic media.

2.2 Financial Instruments

For the purposes of MAR and this Insider Policy, the concept of Financial Instrument must be understood widely and include for example listed equity securities, debt securities and derivatives. In Sampo Group context these include:

- shares of Sampo plc;
- listed bonds and other debt instruments issued by any Group Company;
- listed money-market instruments issued by any Group Company;
- derivatives or other financial instruments linked to any of the above; and
- any other financial instruments linked to Sampo Group which is admitted to trading on a regulated market or multilateral trading facility.

2.3 Prohibited use and disclosure of inside information

Insider dealing is prohibited under MAR, and no person may engage in – or attempt to engage in – any act that constitutes, or could constitute, insider dealing.

Prohibition against insider dealing

A person who possesses inside information must not use that information to acquire or dispose of Financial Instruments to which it pertains, whether directly or indirectly, and whether for their own account or for the account of a third party. It is also prohibited to use inside information to cancel or amend an order concerning a Financial Instrument to which that information relates where the order was placed before the person came into possession of the inside information.

Prohibition against recommending and inducing

A person who possesses inside information relating to a Financial Instrument must not recommend or induce another person to acquire or dispose of, or to cancel or amend an order concerning, that Financial Instrument.

Prohibition against acting on recommendations and inducements

A person who acts on a recommendation or inducement, knowing or having reason to know that it is based on inside information, is also engaging in insider dealing.

Prohibition against unlawful disclosure of inside information

Inside information must not be disclosed to another person unless the disclosure meets both of the following legal requirements under MAR:

- i. the disclosure is made in the normal exercise of an employment, a profession or duties; and
- ii. the confidentiality of the disclosed information can be ensured, including through appropriate confidentiality agreements such as a written non-disclosure agreement.

In addition to the legal requirements above, Sampo Group requires that any disclosure of inside information to a third party must also be in the best interest of Sampo Group and follow the internal procedure set out below:

Before disclosing inside information, a person must:

- contact the Insider Administration;
- ensure that the receiving party is registered as an insider on the relevant project-specific insider list upon disclosure; and
- ensure that the inside information is disclosed only through a secure connection.

A breach of insider regulation may lead to criminal, administrative, or employment-related sanctions against Sampo Group and/or the person(s) in breach. Sanctions are described in more detail in section 6.

2.4 Sampo Group Insiders

Sampo Group Insiders are divided into three groups, each defined by their role or access to inside information. Each insider will be notified separately of their inclusion in the insider groups.

2.4.1 Managers

Managers are members and deputy members of the Board of Directors of Sampo plc, the Group CEO and their deputy, and any other member of Sampo Group's top management who have regular access to inside information and the power to make managerial decisions affecting the future developments and business prospects of Sampo plc and who are separately classified as Managers by the Board of Directors. This classification does not extend the scope of MAR but reflects Sampo Group's internal governance structure.

Certain obligations that apply to Managers extend equally to their Closely Associated Persons, defined according to MAR as:

- (a) Family members, meaning:
 - i. the Manager's spouse or registered partner;
 - ii. the Manager's partner who has lived in a shared household for at least five years on the date of the transaction, or the Manager's partner living in a shared household on the date of the transaction who have, or have had, a joint child or joint parental responsibility for a child;
 - iii. the Manager's dependent child; and
 - iv. the Manager's relative who has shared the same household for at least one year on the date of the transaction.
- (b) A legal entity (legal person, trust, or partnership) that:
 - i. the managerial responsibilities of which are discharged by the Manager or a family member and where the Manager or family member takes part in or influences the entity's decisions to carry out transactions in Financial Instruments of Sampo plc;
 - ii. is directly or indirectly controlled by the Manager or a family member;

- iii. is set up for the benefit of the Manager or a family member; or
- iv. has economic interests substantially equivalent to those of the Manager or a family member.

If any Group Company acts as an issuer within the meaning of MAR, references to Managers and their Closely Associated Persons and obligations imposed on them in this Insider Policy shall also apply, as appropriate, to the Managers and their Closely Associated Persons of such Group Company.

2.4.2 Restricted Persons

In accordance with the Nasdaq Guidelines and in order to maintain high-level of compliance, Sampo Group applies company-specific trading restrictions for persons working with interim statements and other financial result announcements, including persons who have access to such information or documents before their publication. Such persons are identified as Restricted Persons, or the criteria for their determination are appointed, by the Person in Charge of Insider Matters.

Certain obligations that apply to Restricted Persons extend to their Restricted Closely Associated Persons, meaning the dependent children of a Restricted Person and entities controlled by a Restricted Person or by any of their dependent children.

2.4.3 Project-specific Insiders

Project-specific Insiders are any persons who have access to inside information in relation to a specific project, deal, or event, regardless of whether they are Managers or Restricted Persons or otherwise employed by or affiliated with the Sampo Group.

3 Trading and trading restrictions

3.1 Trading in Sampo Group's Financial Instruments

All Sampo Group's employees and the Sampo Group Insiders shall carry out their trading in Sampo Group's Financial Instruments so that trading will not undermine confidence in Sampo Group's Financial Instruments.

Additionally, it is strongly recommended that Managers and Restricted Persons only make long-term investments in Sampo Group's Financial Instruments and that trading will take place at times when the market has as complete information as possible on matters affecting the prices of Sampo Group's Financial Instruments. Short-term or speculative trading is inconsistent with Sampo's expectation of conduct, and therefore, should be avoided.

The Group CEO may decide that trading in Sampo Group's Financial Instruments is subject to a permission procedure. Such process may apply to all or only some Managers or Restricted Persons, who will be notified separately.

Subsections 3.2–3.4 below describe the trading restrictions applied within Sampo Group to persons mentioned in each subsection. It should be noted that such trading restrictions may not be circumvented by trading on one's own account through a Closely Associated Person, a Restricted Closely Associated Person or through other intermediaries. When necessary, a person subject to the trading restrictions shall inform their Closely Associated Persons and Restricted Closely Associated Persons of these rules and of the obligations imposed on them hereunder.

The trading restrictions set out in subsections 3.2-3.4 below apply to basket products, e.g. units and shares of UCITS/AIF, units and shares of index funds and exchange-traded funds (ETFs), only when the Financial Instrument of the Company and/or Financial Investment represents at least 20% of the basket's composition.

3.2 Closed Window for Managers and Restricted Persons

Managers, Restricted Persons and Restricted Closely Associated Persons must not, directly or indirectly, conduct any transactions on their own account or for the account of a third party, relating to the Financial Instruments of the Company during the Closed Window of 30 calendar days before the announcement by Sampo Group of interim statements, a half-year report, a financial statement bulletin or preliminary information thereon, or, if the full-year report contains material information that has not been published previously in the financial statements bulletin, a full-year report by Sampo Group.

Notwithstanding that the Closed Window ends at the time of publication of a financial report, it is recommended that trading be deferred for a reasonable period following such publication to allow the market adequate time to absorb the published information. The Restricted Persons shall inform their respective Restricted Closely Associated Persons of the aforementioned trading restriction.

3.3 Trading restrictions for Project-specific Insiders

A person entered into an insider list may not conduct any transactions on their own account or for the account of a third party, relating to the Financial Instruments of the company and/or companies involved in the relevant project for the duration of that project. The restriction takes effect upon receipt of a written email notification confirming the person's inclusion on the insider list and their responsibilities. Furthermore, the prohibitions and restrictions referred to in section 2.3 of this Insider Policy apply whenever a person is entered into a project-specific insider list.

The restriction remains in force until the person is no longer a party to the project or until the project has been duly terminated. This trading restriction applies even if the person's employment or service contract ends before the project has been terminated.

3.4 Trading Restrictions for Financial Investments

Sampo plc or any Group Company may, from time to time, have holdings in companies outside of Sampo Group. Such holdings, defined as Financial Investments in this Insider Policy, may include any type of investment made by Sampo plc or a Group Company, as determined by the Group CEO.

Trading in such Financial Investments shall be carried out with utmost caution following the general guidelines for trading, as well as the restrictions set out in this Insider Policy.

The Group CEO may decide that trading in certain Financial Investments is subject to a permission procedure. Such process may apply to separately determined GEC and/or senior management members as well as their dependent children and controlled entities.

More information about Financial Investments can be received from the Insider Administration.

4 Managers' and closely associated persons' notification obligation

4.1 Managers' notification obligation

The Managers have an obligation to notify Sampo plc and the FIN-FSA of transactions conducted on their own account relating to the Financial Instruments of the Company. The Managers are required to notify the Company of all transactions conducted with the Financial Instruments of the Company. However, only transactions exceeding the annual threshold of EUR 20,000 must be notified to the FIN-FSA.

The transaction notifications must be submitted promptly and no later than three (3) business days after the date of the transaction:

- to the Company: by email to transactions@sampo.fi, using the notification template available on the FIN-FSA's website⁴; and
- to the FIN-FSA: through FIN-FSA's electronic service at <https://asiointi.finanssivalvonta.fi/>⁵

Transactions to be notified cover, inter alia, acquisitions and disposals, pledging, lending, gifts, subscriptions, exchange, donations and inheritance. This duty is in force irrespective of the trading venue where that transaction has been conducted. The notification obligation applies to basket products, e.g. units and shares of UCITS/AIF, units and shares of index funds and exchange-traded funds (ETFs), only when the Financial Instrument of the Company represents at least 20% of the basket's composition.

The Company will publish the transactions as stock exchange releases promptly, and no later than two (2) business days after receiving the transaction notification from the Manager.

The Company must notify the Managers of their notification obligations in writing. The Company maintains a non-public list of the Managers and their Closely Associated Persons.

4) The notification form is available at www.finanssivalvonta.fi

5) Further instructions on the use of the FIN-FSA's electronic service are available at the FIN-FSA's website at

<https://www.finanssivalvonta.fi/en/financial-market-participants/capital-markets/issuers-and-investors/Managers-transactions/>

4.2 Closely Associated Persons' notification obligation

The Closely Associated Persons shall notify the Company and the FIN-FSA of transactions conducted on their own account relating to the Financial Instruments of the Company.

The transaction notifications must be submitted promptly and no later than three (3) business days after the date of the transaction:

- to the Company: by email to transactions@sampo.fi, using the notification template available on the FIN-FSA's website⁶; and
- to the FIN-FSA: through the FIN-FSA's electronic service at <https://asiointi.finanssivalvonta.fi/>.

Transactions to be notified cover, inter alia, acquisitions and disposals, pledging, lending, gifts, subscriptions, exchange, donations and inheritance. This duty is in force irrespective of the trading venue where that transaction has been conducted. The notification obligation applies to basket products, e.g. units and shares of UCITS/AIF, units and shares of index funds and exchange-traded funds (ETFs), only when the Financial Instrument of the Company represents at least 20% of the basket's composition.

The Company will publish the transactions as stock exchange releases promptly, and no later than two (2) business days after receiving the transaction notification from the Closely Associated Person.

The Managers must notify their Closely Associated Persons of these obligations in writing.

5 Insider lists

Under MAR, an issuer is obligated to establish and maintain project-specific insider lists when inside information comes into existence. Therefore, a project-specific insider list will be established of all persons who have access to inside information and who are working for the Company under a contract of employment, or otherwise performing tasks through which they have access to inside information. The insider lists are not public but must be provided to the FIN-FSA, the SWE-FSA and the DEN-FSA upon their request. Project-specific insider lists are retained for five (5) years after such list is established or updated.

In addition, Sampo maintains a list of the Managers and their Closely Associated Persons. This list is not considered an insider list and is not public.

5.1 Establishing a project-specific insider list

Sampo's insider lists are project-specific, i.e. an insider list is established in connection with each measure or an arrangement which can be individualised, is subject to confidential preparation and which, when published, would be likely to have a significant effect on the prices of the Company's Financial Instruments. Insider Administration evaluates case by case, on the basis of the information available at the time of the assessment, whether a measure or arrangement in preparation shall be considered meriting the establishment of an insider list.

⁶) The notification form is available at www.finanssivalvonta.fi

A project is often a measure or an arrangement which deviates from the usual business operations or the disclosed strategy of the Company because of its nature or size. According to the Nasdaq Guidelines, a project refers to a confidential and identifiable set of measures or an arrangement under preparation which the issuer considers as inside information and the disclosure of which it has decided to delay. A set of measures or an arrangement shall usually be deemed a project, if

- its preparation has progressed to a stage where the Company has made a decision to take or has already taken concrete preparatory measures aimed at the realisation of the arrangement;
- it can reasonably be assumed to materialise; and
- another party has taken concrete measures aiming at the realisation of the arrangement, when the realisation of the arrangement from the Company's perspective requires contribution by another party.

If a project that may involve inside information is in preparation within the Sampo Group, the person in charge of the preparation of the measure shall contact the Insider Responsible in order to assess the need to establish an insider list. The decision on the establishment of an insider list shall be made by the Chair of Sampo plc's Board of Directors, Sampo Group's CEO, or Sampo Group's CFO, after having discussed the matter with the Insider Responsible. The insider lists are maintained in the Insider Administration.

Inside information may only be disclosed to the extent and in so far as provided for under applicable regulation and this Insider Policy. The disclosure of inside information must in all circumstances be reported immediately to the person in charge of the relevant insider project to ensure that the recipient of the inside information is entered into the insider list.

5.2 Persons recorded in a project-specific insider list

A person that has been entered into a project-specific insider list, i.e. a Project-specific Insider, will receive an email of the register entry, stating the confidential and insider nature of the information in question and the obligations and possible sanctions related to the register entry.

The Project-specific Insider shall send an acknowledgment of receipt immediately after receiving such notice. A person is deemed to have had access to the inside information no later than the time of their acknowledgement and such time will be recorded in the insider list. For the avoidance of doubt, if a person had access to inside information prior to receiving notification, the earlier time of access will be recorded in the insider list instead.

A Project-specific Insider shall keep all information relating to the project, including information on the existence of the project, strictly confidential and is subject to the prohibition to disclose inside information. The Project-specific Insiders are also subject to trading restrictions set forth above in subsection 3.3.

A person may possess inside information already before an insider list has been established. Each person must therefore continuously assess whether the information in their possession constitutes inside information.

6 Supervision and sanctions

6.1 Supervision of insider matters

The information entered into the insider lists is checked annually. The Insider Responsible is in charge of the inspection.

Compliance with the obligations under this Insider Policy shall be supervised by the Insider Responsible. If a Group Company has issued its own internal guidelines that are stricter than this Insider Policy, the company in question is obliged to supervise compliance with its internal guidelines. All Group Companies' internal guidelines on insider matters and any updates made to such guidelines from time to time shall be provided to the Insider Responsible.

6.2 Administrative sanctions

The FIN-FSA, and the SWE-FSA as well as the DEN-FSA, as applicable, operate as supervising authorities in insider matters regulated by MAR and MAD II. The FIN-FSA may by virtue of the Act on the Financial Supervision Authority (878/2008) impose administrative sanctions, for example, a fine to those who neglect or breach provisions of MAR. In addition, the SWE-FSA and the DEN-FSA may, where they have jurisdiction, impose administrative sanctions with regard to, for example, insider dealing and unlawful disclosure of inside information.

6.3 Criminal sanctions

Chapter 51, sections 1 and 2 of the Penal Code (39/1889) provide for offences of abuse of inside information and aggravated abuse of inside information. The provisions of Penal Code are applied only when the act is committed deliberately or through gross negligence. Abuse of inside information can lead to penalty or imprisonment up to two years, and aggravated abuse of inside information can lead to at least four months and up to four years of imprisonment. In addition, other jurisdictions may in applicable cases have competence to impose criminal sanctions as a result of violations of insider rules.

6.4 Employment related sanctions

If a person who has concluded an employment or service contract with a company belonging to the Sampo Group violates the provisions of this Insider Policy, the Insider Responsible, having consulted the HR function, shall be entitled to issue a written warning to such person. In addition, depending on the nature of the violation, the employer may be entitled to issue a warning, give a notice or terminate the employment or service contract or reduce variable compensation.

A material breach of this Insider Policy by persons employed by Sampo Group may be deemed to constitute grounds for terminating employment.

6.5 Whistleblowing

Sampo Group has in place specific and appropriate procedures to report infringements.

All whistleblowing notifications are promptly investigated upon receipt. The investigations are carried out in a confidential manner, and the identity of the whistleblower is protected as far as possible.

7 Definitions

Definition	Explanation
"Closed Window"	means a closed window of 30 calendar days before the announcement of an interim statement, a half-year financial report, a financial statement bulletin or preliminary information thereon, or, if the full-year report contains material information that has not been published previously in the financial statements bulletin, a full-year report by Sampo Group, during which the Managers, Restricted Persons and Restricted Closely Associated Persons shall not conduct any transactions on their own account or for the account of a third party, directly or indirectly, relating to the Financial Instruments of the Company.
"Closely Associated Persons"	means certain family members and legal entities closely associated with the Managers as further defined in section 2.4.1.
"Company" or "Sampo"	means Sampo plc.
"Financial Instruments"	means, for the purposes of MAR and this Insider Policy, for example listed equity securities, debt securities and derivatives. In Sampo Group context these include: shares of Sampo plc; listed bonds and other debt instruments issued by any Group Company; listed money-market instruments issued by any Group; derivatives or other financial instruments linked to any of the above; and any other financial instruments linked to Sampo Group which is admitted to trading on a regulated market or multilateral trading facility.
"Financial Investments"	means Sampo Group's and/or Sampo plc's holdings in companies outside of Sampo Group where GEC members and other senior management (such as Group CRO, Head of IR/ Legal, Investment Function employees or other similar position determined by the Group CEO) are Board members. Financial Investments can also refer to any type of investment of Sampo plc/Group, as determined by the Group CEO.
"FIN-FSA"	means the Finnish Financial Supervisory Authority.
"SWE-FSA"	means the Swedish Financial Supervisory Authority.
"DEN-FSA"	means the Danish Financial Supervisory Authority
"GEC"	means the Sampo Group Executive Committee.
"Group Company"	means, in accordance with the Finnish Accounting Act (1336/1997, as amended) any company in which Sampo holds all of the shares or voting rights pertaining to shares or holds shares or voting rights pertaining to such an amount that Sampo has a controlling interest in the company.

"Managers"	means the members and deputy members of the Board of Directors of the Company, the Group CEO and his deputy, and the members of the Company's top management separately classified as managers by the Board of Directors, and any other person belonging to the Company's top management who has regular access to inside information relating directly or indirectly to the Company and power to make managerial decisions affecting the future developments and business prospects of the Company.
"Project-specific Insiders"	means any persons who have access to inside information in relation to a specific project, deal, or event, regardless of whether they are Managers or Restricted Persons or otherwise employed by or affiliated with the Sampo Group.
"Restricted Closely Associated Persons"	means dependent children of a Restricted Person and entities controlled by a Restricted Person or by any of their dependent children.
"Restricted Persons"	means certain persons working with interim statements and other financial result announcements and persons having access to such information or documents before publication thereof. The Restricted Persons, or the criteria for their determination, are appointed by the Person in Charge of Insider Matters.
"Sampo Group"	means Sampo plc and its subsidiaries.

8 Implementation and compliance

Every person covered by this Insider Policy is personally responsible for complying with all requirements of MAR, including the obligation to identify and safeguard inside information, the prohibition on trading in financial instruments on the basis of inside information (whether directly or through a third party), the prohibition on disclosing inside information outside of a strict need-to-know, and the obligation to make all applicable notifications required under MAR (including Manager's transaction notifications under Article 19 of MAR where applicable). Non-compliance is a matter of personal legal liability and may give rise to administrative, civil, and criminal consequences.

To enable employees to fulfil their responsibilities, the leaders must ensure proper implementation of this Insider Policy within their respective areas of responsibility.

9 Review and updating of the Policy


This Policy shall be reviewed annually and always when deemed necessary. All material updates and amendments to this Insider Policy shall be approved by Sampo plc's Board of Directors. The Insider Responsible is in charge of the review and update process.



SAMPO GROUP

 www.sampo.com

 [Sampo_plc](#)

 [Sampo_plc](#)

 [Sampo plc](#)

Sampo plc

Fabianinkatu 21

00130 Helsinki

Finland

Telephone: +358 10 516 0100

Business ID: 0142213-3