



# **Posti Group Corporation**

## **DISCLOSURE POLICY**

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## 1. Introduction

This Disclosure Policy, as approved by the Board of Directors of Posti Group Corporation (the "**Company**"), describes the principles and procedures under which the Company operates in conducting investor communication and financial reporting. The principles set in the Disclosure Policy govern the Company and its subsidiaries.

In its communications, the Company complies with Finnish legislation, EU regulation, including stipulations contained in the regulation (EU) No 596/2014 of the European Parliament and of the Council on market abuse (Market Abuse Regulation, "**MAR**"), rules and guidelines of Nasdaq Helsinki Ltd ("**Nasdaq Helsinki**"), as well as the guidelines of ESMA (European Securities and Markets Authority) and the Finnish Financial Supervisory Authority. The Company also complies with the Finnish Corporate Governance Code for listed companies and with the Company's internal rules and guidelines.

The Company's Board of Directors approved this disclosure policy on 22 August 2025. The Disclosure Policy will be reviewed and updated when needed.

## 2. Objectives and principles

The key disclosure principles of the Company's investor communications are openness, activeness, reliability, transparency and fairness. The Company communicates clearly and consistently both positive and negative matters.

The objective of the Company's financial and investor communications is to ensure that all market participants have simultaneously and without delay an access to correct, sufficient and substantial information on the material factors relating to the Company and its business, which factors may have an effect on the value of the Company's financial instruments, and that the information disclosed gives correct and sufficient information on the Company's operations.

Disclosure comprises the obligation to disclose periodic and ongoing information. The Company discloses information under the disclosure obligation as soon as possible and simultaneously to all stakeholders. The Company has internal procedures in place to evaluate relevancy of information.

The Company's official reporting language is Finnish. All stock exchange releases are published by the Company in Finnish and English. Press releases are mainly published in Finnish.

## 3. Disclosed information and types of releases

Disclosure of periodic information refers to information published by the Company on a regular basis in accordance with the Finnish Securities Markets Act and other regulation as well as rules of Nasdaq Helsinki and the standards of the Finnish Financial Supervisory Authority regarding its financial position and development in the interim report and half-year report, annual report, financials statements and report of the Board of Directors. The Company reports its financial figures at group level.

The Company publishes the annual report, the half-year report and the interim report according to a schedule announced in advance. The publication dates of financial results are disclosed before the start of the upcoming accounting period, and they are made available on the Company's website.

In addition, the Company publishes a corporate governance statement and a remuneration report for each financial year. The Company also publishes a sustainability report as part of the report of the Board of Directors and the auditor's report on the financial statements.

Under the ongoing disclosure obligation, the Company primarily publishes as stock exchange releases only specified regulated information and on the other hand, inside information to be published under the MAR. Inside information included in the sphere of the ongoing disclosure obligation may include:

- any significant change in the Company's result and/or financial position;
- any significant change in the Company's future outlook;
- significant change in the Company's operations and strategy;
- significant business acquisition;
- a merger or demerger of the Company or other significant corporate arrangement;
- significant agreements on joint ventures and/or financial arrangements;
- significant organizational change;
- significant changes in the composition of the Board of Directors or the Posti Leadership Team;
- significant legal actions or other proceedings by authorities and decisions ruled the proceedings; or
- a significant share issue, purchase or redemption offer or another change relating to the shares of the Company, such as the combining or division of shares.

Further, the Company publishes stock exchange releases on managers' transactions, notifications on changes in shareholding and other disclosed matters in accordance with the rules of Nasdaq Helsinki.

### **Stock Exchange Releases, Investor News and Press Releases**

Posti publishes Stock Exchange Releases, Investor News and Press Releases. The category of the release is determined by the materiality and significance of the information.

#### ***Stock exchange releases***

The Company discloses inside information as a stock exchange release as soon as possible. In addition, information disclosed according to the periodic disclosure obligation and periodic reports as well as information disclosed in accordance with the rules of Nasdaq Helsinki are published by the Company through a stock exchange release.

The stock exchange releases are submitted to the national Stock Exchange repository maintained by Nasdaq Helsinki and to the main media and are published on the Company's website.

### *Investor News*

Posti Group publishes as Investor News matters related to the company's business that are not inside information and do not meet the criteria set for a Stock Exchange Release in the applicable law or Posti Group's disclosure policy, but which are considered to be of general interest to investors and other capital market participants.

Investor news may include, for example, invitations to the publication of the company's financial reports or Capital Markets Day, strategic development projects or changes in the company's operations, acquisitions, investments, financing, and mergers and acquisitions, and restructuring or discontinuation of operations.

### *Press releases*

Press releases targeted at general and industry media provide information about events related to the Company's business that do not fulfill the criteria for a stock exchange release but are estimated to be newsworthy or otherwise of interest among stakeholders of the Company.

In addition, Posti publishes other news locally and news on its website that does not meet the criteria given for the above-mentioned releases.

## **4. Disclosure obligation of inside information and delay of disclosure**

The Company publicly discloses inside information as soon as possible, unless the disclosure is delayed in accordance with the MAR, whereupon the conditions of delay set forth in MAR need to be met. In accordance with the provisions of MAR, the Company may delay disclosure of inside information provided that all of the following conditions are met:

- immediate disclosure of information is likely to prejudice the legitimate interests of the Company,
- delay of disclosure is not likely to mislead the public, and
- the Company is able to ensure the confidentiality of such inside information.

The Disclosure Committee decides on the delayed disclosure of inside information based on the assessment whether the grounds for delayed disclosure are met. Exceptionally, the CEO or CFO may decide on the delayed disclosure alone, provided that it is justified by the urgency of the matter.

In connection with the decision to delay the disclosure of information, the preconditions for postponement are documented, an insider list concerning the matter is established and a formal decision on postponement is made. The Company discloses the delayed information to the public as soon as possible after the conditions for the delay are no longer met. The Finnish Financial Supervisory Authority will be notified about the delay in connection with the disclosure of the inside information. The Company has no obligation to publish the information or notify the Finnish Financial Supervisory Authority of the decision to delay the disclosure of information if the inside information has ceased to constitute inside information.

## **5. Insiders**

The Company's insider instructions and insider management comply with the requirements of the MAR and provisions issued thereunder, the guidelines of the Finnish Financial Supervisory Authority and ESMA, and the rules and insider guidelines of Nasdaq Helsinki. In addition, the Company complies with its own insider guidelines, approved by the Board of Directors.

A person who discharges managerial responsibilities within the Company or who has been defined to be subject to the trading restriction may not, directly or indirectly, execute transactions on their own account or for the account of a third party during a closed period. The closed period begins thirty (30) days prior to the publication of the financial statements bulletin, half-year report or interim report and ends at the end of the day when the financial statements bulletin, half-year report or interim report has been published. The Company does not repurchase its own shares during this period.

The Company applies a so-called whistleblowing communication channel, which enables the Company's employees to notify, where there is a reasonable suspicion that someone employed by or at the service of the Company has breached securities market legislation and provisions. If a reasonable doubt on a breach arises or if a breach can be substantiated, the case is taken to the competent authorities for investigations.

## **6. Future outlook and profit warnings**

The Company shall annually disclose its outlook statement as a part of the report of the Board of Directors. The assessment of the future outlook is presented for the Posti Group and it regards, unless otherwise stated, the remaining financial year. The assessment provided is based on the view of the Company's management on the estimated development of the Posti Group and its business operations at the time of the presentation. In addition, the Company may present an outlook statement relating to its expected future financial performance (profit forecast) also in the financial statements bulletin, half-year report and interim report.

A profit warning will be issued without undue delay if the Company's view on the development of the Company's financial outlook deviates unexpectedly and significantly in a positive or negative manner from the Company's previously disclosed estimate or from what can be reasonably estimated based on the previous disclosures of the Company. The issuance of the profit warning is decided by the Board of Directors, and the issuance of a profit warning cannot be delayed. Exceptionally, the CEO may decide on the issuance of a profit warning, if the Board of Directors is not available for decision-making.

## **7. Communication channels**

The primary channel for investor communications is the Company's investor page at [posti.com/investors](https://posti.com/investors). On its website, the Company aims to provide reliable and timely information to ensure that the Company's stakeholders have sufficient information to support the valuation of the Company and its securities.

The Company's stock exchange releases are distributed simultaneously through the release distribution platform and the Company's investor pages. Stock exchange releases published by the Company are made available on the Company's investor pages for at least five years after their release. Financial reports, corporate governance statements and remuneration reports are maintained for at least ten years after their release.

The Company also has different means and channels for disclosing information to stakeholder groups, such as different publications, interviews and other appearances. Other essential material, such as media and investor communication presentations, possible webcasts and phone conferences, will remain available on the Company's website at least for five years.

The Company may use social media in its communications. However, social media is not the primary communication channel for information under the disclosure obligation.

## **8. Investor, analyst and media relations**

The Company meets with capital market and media representatives and responds to routine queries submitted by shareholders, investors, analysts and the media without undue delay. The Company can arrange information events and meetings with the representatives of capital markets and media.

Financial information is communicated with investors, analysts and media representatives primarily by the Company's CEO, CFO and Head of Investor Relations. Other members of the Posti Leadership Team, Disclosure Committee or Board Chair (representing the Board only) may participate in the meetings together with the aforementioned persons.

The objective of the meetings is to provide information on the Company and its operating environment. Discussions with the media are based on information previously published by the Company or on information generally available to the public. New undisclosed information or such supplementary information that may have an effect on the value of the Company's financial instruments and that may constitute inside information together with the previously published information will not be published during these events.

Analysts observing the Company and their assessments on the Company may be published on the Company's website. Any opinions, estimates or forecasts regarding the Company's performance made by these analysts are theirs alone and do not represent opinions, forecasts or predictions of the Company or its management.

Upon request, the Company may review an analysis or report made by an analyst, but only with regard to the correctness of the information and based on disclosed information. The Company does not comment or take any responsibility for estimates or expectations made by capital market representatives. The Company does not comment on the Company valuation or price formation of the Company's financial instruments, give preference to any particular analyst or distribute analyst reports to the investment community.

## **9. Disclosure Committee**

The responsibility to monitor the development of the business and result of operations as well as ensure the consistency of the Company's disclosures and related practices, lies with the Disclosure Committee.

The Disclosure Committee consists of

- Chief Executive Officer (CEO);
- Chief Financial Officer (CFO);
- General Counsel;
- VP, Communications; and
- Head of Investor Relations.

In addition, the Disclosure Committee shall review all stock exchange releases to be published by the Company. The Disclosure Committee convenes as necessary, but at least on a quarterly basis after the closing of the quarter to review the periodic financial release.

In addition, the Disclosure Committee shall also review and approve the contents of the annual report, corporate governance statement and remuneration report before they are submitted to the Board for approval.

## **10. Responsibilities and spokespersons**

Reports and releases disclosed according to the periodic disclosure obligation are approved by the Board of Directors. In addition, the Board of Directors approves significant stock exchange releases, such as the release regarding the appointment of the CEO. Stock exchange releases regarding disclosure of inside information are approved by the Board of Directors or in cases of particular urgency, the Disclosure Committee, and other stock exchange releases are approved by the Disclosure Committee.

The CEO or other managers of the Company shall not comment on matters related to the Board of Directors of the Company. The Board of Directors is primarily represented by the Chair.

According to law, the Company is represented by the Board of Directors in all matters and by the CEO in all matters within the competence of the CEO. The CEO, CFO, Head of Investor Relations or other person authorized by the CEO is entitled to issue statements on behalf of the Company. The CFO represents the Company in matters related to the Company's financial performance.

All information is provided by the Company within the limits of previously publicly disclosed information and accurately in accordance with such information. Information deviating from the Company's previous disclosures may not be given in individual

statements; nor may supplementary information which might, combined with previously disclosed information, comprise new material information that can be considered to be inside information.

In crisis situations, the Disclosure Committee is in charge of communications. Crisis communications is carried out by designated people, with the goal of distributing information in a reliable, fast, clear, proactive and open manner.

## **11. Rumors and information leaks**

The Company issues statements on its own operations and generally does not comment on the operations of its competitors, suppliers or customers.

The Company does not comment on market rumors, unless it is necessary to correct relevant or clearly inaccurate information as required by regulation or the rules and guidelines of Nasdaq Helsinki. The Company may consider publicly disclosing a stock exchange release to correct clearly incorrect or misleading information that is likely to have a significant effect on the price of the Company's financial instruments.

In the event the Company becomes aware that confidential and relevant information has leaked to a third party outside the Company's statutory insiders who has no obligation of confidentiality, the confidentiality of the information cannot be otherwise guaranteed or the information has leaked to the public, the Company will disclose the information as a stock exchange release as soon as possible as required by regulation.

## **12. Silent period**

The Company adheres to a 30-day silent period in its investor and media relations before the publication of the interim report, half-year report or financial statements bulletin. During this time, the Company will not give comments to the media or other parties on the Company's financial position, markets or outlook. During the silent period, the Company will refrain from making contact, including not meeting with representatives of capital markets.

If an event during the silent period requires immediate publication, the Company will publish the information as soon as possible in accordance with regulations regarding the disclosure obligation and can comment on the event in question.

## **13. Changes, deviations and maintenance**

The Disclosure Committee is responsible for implementing, overseeing and interpreting Posti's Disclosure Policy and has the authority to give further instructions on the practical implementation of the policy.

Questions relating to this Disclosure Policy may be addressed to:

Communications: Anu Laukkanen, [anu.e.laukkanen@posti.com](mailto:anu.e.laukkanen@posti.com), +358 50 4605 550

Investor relations: Marja Mäkinen, [marja.makinen@posti.com](mailto:marja.makinen@posti.com), +358 40 6712 999

This Policy has been approved by the Company's Board of Directors on 22 August 2025, and it is effective upon listing of the Company's share in Nasdaq Helsinki. The Company's Board of Directors shall approve any changes to this Policy; however, technical changes therein may be implemented by the approval of the CEO.

Technical amendments to the disclosure policy took place on April 28, 2026.