



Componenta Corporation's
Insider Guideline



COMPONENTA

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Componenta Corporation complies with the Market Abuse Regulation ((EU) No 596/2014, "MAR") and Level 2 regulation under it, the provisions of the Finnish Securities Markets Act and the Finnish Penal Code, any regulation and guidance given by the European Securities Markets Authority (ESMA) and the Finnish Financial Supervisory Authority as well as the Guidelines for Insiders published by Nasdaq Helsinki Ltd in the form valid at any given time, complemented with the specifications applicable to Componenta Corporation given below.

Disclosure of inside information and delaying of disclosure

Componenta Corporation will release inside information directly concerning Componenta as soon as possible. The company will publish all the inside information on its website where it will be available for at least five years.

The company may delay the public disclosure of inside information as the conditions for delay stipulated in MAR are fulfilled. The delay decision can be made by the Board of Directors or the company's CEO. The company will inform Financial Supervisory Authority of the decision to delay the disclosure of inside information immediately after the public disclosure of the information.

The process concerning the public disclosure of inside information and the delay of the disclosure is described in Appendix 1 of this guideline.

Insider list

Componenta maintains a project-specific insider list of any projects and events which, if realised, are likely to have a significant effect on the value of Componenta's shares, financial instruments or the derivatives related to them and which have been subject to delaying of disclosure in accordance with MAR. Regarding their scope or nature, such projects are clearly different from the company's normal business. Every person with access to inside information related to the project is recorded in the project-specific inside list. A person named in the project-specific list may not disclose the inside information to outsiders or other Componenta employees unlawfully, trade or engage in transactions with Componenta's financial instruments or advise others in relation to the aforementioned. In addition, changing or cancellation of the assignments related to Componenta's financial instruments is forbidden when a person holds insider information.

The person disclosing the insider information shall make sure in advance that the receiver of the information has a right to receive the information by being already listed in the Company's insider register. If insider information is disclosed to a person who is not listed as an insider in the Company's insider register but the person needs the information to carry out his/her duties, such person shall immediately be informed of the insider nature of the information in question and be registered in the relevant insider register. If insider information is disclosed to a person outside Componenta (such as financial or other advisors), the person disclosing the information shall make sure that the recipient of the information undertakes to maintain the confidentiality of the information and applies insider regulations in effect. Parties acting on behalf of or for Componenta have a separate obligation to prepare and maintain insider list of persons who have access to the insider information.

Other insider situations

Every Componenta employee or other person with access to inside information concerning Componenta, even when such information has been obtained coincidentally, is always covered by the scope of the prohibitions and restrictions applicable to the use and disclosure of inside information. The person with access to inside information may not disclose the inside information to outsiders unlawfully, trade or engage in transactions with Componenta's financial instruments or advise others in relation to the aforementioned. In addition, changing or cancellation of the assignments related to Componenta's financial instruments is forbidden when a person holds insider information. Regardless of the manner in which any Componenta employee or other person has received inside information concerning Componenta Corporation, the person must be added in the potential project-specific insider list. The person must also personally ask to be added in the list, if necessary.

The management of the company or insiders may also hold other confidential information not considered as insider information. For handling and disclosure of such confidential information, general regulations and the company's internal guidelines are applied.

Notification obligation

In accordance with the applicable legislation, the persons discharging managerial responsibilities in Componenta (the Board of Directors, President and CEO and the Corporate Executive Team) and the persons closely associated with them notify Componenta and the Financial Supervisory Authority of any trading and other transactions related to Componenta's shares or debt instruments or related derivatives or other financial instruments made on their own account no later than within three days of the transaction. The threshold for the notification obligation is EUR 20,000 per calendar year. Componenta makes public disclosures on the aforementioned trading and transactions in accordance with the applicable legislation.

Trading restriction

Componenta complies with the prohibition on trading (the so-called closed window) that starts 30 days before the release of a financial report or financial statement and ends with the release of the financial report or financial statement. During this time, the persons discharging managerial responsibilities in Componenta (the Board of Directors, President and CEO and the Group's Corporate Executive Team) may not, on their own account or for a third party, directly or indirectly, engage in trading and other transactions related to Componenta's shares or debt instruments or related derivatives or other financial instruments. Componenta has separately appointed certain persons involved in the preparation of Componenta's financial reports, also subject to the aforementioned prohibition on trading.

Management of insider issues

Componenta Corporation's Insider Guideline, composed of the Guidelines for Insiders published by Nasdaq Helsinki Ltd and these specifications, is available on the company's intranet pages. Furthermore, Componenta has internal procedures in place for the projects referred to in the Insider Guideline.

Tasks of insider management

The company's insider management is in charge of the following tasks:

- company internal communication of insider issues
- the provision of training on insider issues in the company
- receiving notifications concerning persons discharging managerial responsibilities
- preparing and maintaining project-specific insider lists
- monitoring insider issues

The person responsible for insider issues in the company is its General Counsel. Company's CFO acts as deputy. The Company's insider management also includes a nominated person in the Company administration who is responsible for, among other things, maintaining of the company's insider lists and the list of persons discharging managerial responsibilities, and for the notifications to those persons. The person responsible for insider issues acts as a substitute for the administrative person handling insider matters.

Company's General Counsel is responsible for trading restriction as well as notification and publishing obligations regarding the transactions conducted by the persons discharging managerial responsibilities. CFO acts a substitute for her/him.

The persons discharging managerial responsibilities are under an obligation to inquire in advance if there are any possible obstacles for transactions with Componenta's financial instruments.

Insider management provides advice and training on insider issues as necessary. Despite this, every insider is personally responsible for complying with the applicable laws, regulations and instructions.

Reporting infringements

Componenta provides the company's employees with a procedure to follow, when reporting suspected infringement of rules and regulations concerning e.g. the financial market, within the company through an anonyme and objective channel (the so-called whistleblowing procedure). The reports can be sent via a link found from Componenta's website: <https://report.whistleb.com/en/componenta>.

Reviewing of insider guideline

Componenta Corporation's Insider Guideline has been approved by the Board of Directors. The Insider Guideline as detailed above was reviewed by Componenta Corporation's Board of Directors on 19 December 2024.

Appendix 1

Delay of the disclosure of and public disclosure of inside information at Componenta

Stage		Party/person responsible	Measures	Materials
1a	Evaluation of inside information, establishment of an insider project and decision on delay of the disclosure	Board of Directors or CEO	<ul style="list-style-type: none"> - Documentation of moment at which inside information is created - The permanent documentation and storage of the decision to delay disclosure and conditions for it, and estimation of duration - Updates as necessary, if there are changes to the conditions for the delay 	FIN-FSA's information according to the form – for the documentation and monitoring of the decision to delay the disclosure
1b	Decision to publish the information, if the conditions of the delay of the disclosure are not met	Board of Directors or CEO authorised by the Board		Stock exchange release
2	To release the information immediately for instance in data leakage situations	Board of Directors or CEO authorised by the Board		Stock exchange release
3	Constant monitoring of the fulfillment of conditions for delay	CEO, CFO and General Counsel		
4a	Extinction of the project	Board of Directors, CEO or CFO	- The extinction of the project and its grounds are recorded in the delay decision	FIN-FSA's information according to the form
4b	Expiry of the project by public disclosure of the project	Board of Directors or CEO authorised by the Board	- Expiry of the project for public disclosure of the project are recorded in the delay decision	Stock exchange release FIN-FSA's information according to the form
5	Notification to FIN-FSA	CEO, CFO or General Counsel	<ul style="list-style-type: none"> - Notification concerning the decision to delay disclosure immediately after the public disclosure of the information - Upon request, a report of the fulfillment of the conditions for delayed disclosure 	FIN-FSA's information according to the form Stock exchange release Possible report to FIN-FSA



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