



Digia Plc

DISCLOSURE POLICY

28 October 2021

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DIGIA PLC'S DISCLOSURE POLICY

This disclosure policy describes Digia Plc's ("Digia" or "the company") key operating principles and practices concerning communication and investor relations that are applied when communicating with various capital market actors and the media.

Digia's share is listed on Nasdaq Helsinki Oy ("Helsinki Stock Exchange"). Digia's CEO and Board of Directors are together responsible for ensuring that Digia's communication meets the requirements of the EU legislation, regulations issued by the European Securities and Markets Authority ESMA, the Finnish legislation, the rules of the Helsinki Stock Exchange and guidelines issued by the Financial Supervisory Authority FIN-FSA. Digia also complies with other communications recommendations for listed companies, such as the corporate governance codes of listed companies.

The disclosure policy is reviewed at regular intervals and changed if necessary.

The person in charge of the disclosure policy is the company's CEO. The disclosure policy is approved by Digia's Board of Directors. The Board approved Digia's disclosure policy on 28 October 2021.

1 Digia's communication principles and objectives

Digia's communication aims to ensure that all market participants have without delay simultaneous access to relevant and sufficient information needed for determining the prices of the company's financial instruments. Information that is likely to have a significant effect on the prices of the company's financial instruments are published to the capital markets and other key stakeholders at the same time and as early as possible.

The company's objective is to continuously provide the markets with information that is consistent, reliable, sufficient and up to date in order to ensure that the capital market actors have as transparent and clear view as possible when assessing the company's financial situation and the value of its financial instruments.

2 Disclosure obligation

2.1 Regular disclosure obligation

Regular disclosure obligation means the company's obligation to regularly disclose information on the development of its financial results and position. Digia publishes

half-yearly reports, financial statements bulletins and business reviews for three and nine months in accordance with a predetermined schedule.

In addition, Digia publishes an annual report, which includes the financial statements, a report of the Board of Directors, the auditor's report, a corporate governance statement and a remuneration report. The company also publishes a corporate responsibility report as part of the annual report.

The annual report is published through a stock exchange release no later than three weeks prior to the Annual General Meeting. The corporate governance statement and remuneration report are also published in PDF format on the company's website.

The company publishes the publication dates of the reports subject to the regular disclosure obligation by the end of the previous financial year.

2.2 Obligation to disclose inside information

Pursuant to the Market Abuse Regulation ("MAR"), Digia discloses any inside information directly related to the company as early as possible. Inside information is published through stock exchange releases.

Inside information means information of a precise nature that is related directly to the company and which, if it were made public, would be likely to have a significant effect on the prices of the company's financial instruments or on the price of related derivative financial instruments.

When assessing whether or not information is inside information, the company takes into account all anticipated effects related to the company's operations as a whole and all other market factors that could have an effect on the price of the company's financial instrument in the situation in question.

The company's CEO, CFO and General Counsel decide on the disclosure and delayed disclosure of inside information. Decisions are made by the CEO alone or by the CFO and General Counsel together.

2.3 Delayed disclosure of inside information

Pursuant to the MAR, Digia may decide to delay the disclosure of inside information if all of the following criteria are met:

- (a) the immediate disclosure of inside information is likely to prejudice the legitimate interests of the company;
- (b) delayed disclosure is not likely to mislead the public; and
- (c) the confidentiality of the inside information can be ensured.

Digia has in place internal processes for the assessment and disclosure of inside information and for assessing and monitoring the criteria for delayed disclosure. The company is prepared to disclose inside information immediately if the criteria for delayed disclosure are no longer met. The company notifies the Financial Supervisory Authority FIN-FSA of any delayed disclosure of inside information in accordance with the instructions issued by the Financial Supervisory Authority.sti.

2.4 Changes in shareholdings and flagging announcements

Digia publishes shareholder announcements in accordance with the Securities Markets Act. Changes in shareholdings must be disclosed and made public if shareholding reaches, exceeds or falls below 5, 10, 15, 20, 25, 30, 50, 66,7 (2/3) or 90 per cent of the total number of votes or shares in the company in question. Flagging announcements must also be issued if a shareholder on the basis of a financial instrument is entitled to receive the target company's shares when the amount in question reaches, exceeds or falls below the notification threshold. Notifications of changes in shareholdings are published without undue delay through stock exchange releases.

2.5 Other information to be published through stock exchange releases

Digia also publishes through stock exchange releases any other information that is required to be published as a stock exchange release pursuant to the regulations concerning disclosure, including the rules of the Helsinki Stock Exchange.

Among other things, stock exchange releases are issued concerning any transactions of the company's executives subject to disclosure and persons closely associated with them, and notices of the shareholders' meetings and the decisions of shareholders' meetings are also published through stock exchange releases.

2.6 Other communication

In addition to stock exchange releases, Digia publishes press releases and news. Digia's press releases and news announce events related to the company's business that do not meet the criteria for stock exchange releases but are considered to be newsworthy or otherwise of general interest to stakeholders.

In addition, Digia publishes on its website customer stories and other content that may be of interest to the company's stakeholders.

3 Policies

3.1 Communication to investors and the media

Digia's objective is active communication between the company and various capital market actors. Digia responds to investor and media inquiries by telephone and email without undue delay.

The company's management meets with investors and analysts on a regular basis at events and meetings where the company, its business, strategy and financial results are presented. The information provided by Digia's management at investor and analyst meetings is limited to information that has already been published or that is otherwise public knowledge in the market. Investor events are coordinated by the person responsible for investor communications.

In addition to financial results reporting, Digia provides additional information that is of interest to investors as specified in this disclosure policy.

3.2 Company representation and responsibilities

At Digia, investor relations and compliance with disclosure regulations are primarily the responsibility of the company's CEO and Board of Directors. If necessary, the CEO or a person appointed by the CEO provides further instructions on the practical implementation of the disclosure policy. The company's Communications Manager is responsible for media relations.

In interviews and meetings concerning Digia, statements may be made by the company's CEO. Upon the CEO's request, other Digia representatives may also attend such events and meetings.

In addition, statements may be made as follows:

- (a) the CEO and CFO in all matters related to the company
- (b) the CEO and CFO in matters related to the company's financial situation and development
- (c) the leader of each business area in matters related to an individual business area

The company's CEO and other management do not comment on matters related to the company's Board of Directors. The Board of Directors is represented by the Chair of the Board.

The CFO is responsible for preparing the information to be disclosed under the regular disclosure obligation. Financial reports and related stock exchange releases are approved by the Board of Directors. The General Counsel, the person responsible for

investor communications and the CFO are jointly responsible for preparing stock exchange releases. Stock exchange releases other than those related to financial reports are approved by the CEO and the Board of Directors. Flagging announcements and notifications of transactions by executives and persons closely associated with them are approved by the General Counsel.

Press releases and news releases are approved by the head of the business area in question, the CEO or Communications Manager, who consult the General Counsel as necessary.

3.3 Silent period

Digia always observes a so-called silent period before the publishing of financial results, during which period Digia's representatives do not meet with capital market actors or comment on the company's financial situation or the outlook for the company or market.

The silent period starts 30 days prior to the publication of financial results and lasts until their publication.

The dates for publishing financial results and the applicable silent period dates are available in the investor calendar on Digia's website.

3.4 Future outlook and guidance

The company publishes for the market its views on the company's future outlook at an annual level. The company is continuously assessing its future outlook and updates its views on the future outlook and its market guidance as necessary. The outlook for the upcoming year will be announced no later than in the financial statement bulletin. The presented outlook is based on the views of the company's management concerning the development of the company's operations. Digia's guidance is published on the company's website.

3.5 Rumours and information leaks

In principle, the company does not comment on competitors or any individual actions of competitors or customers, matters related to the company's owners or ownership, the stock price level or market rumours. In addition, Digia does not comment on any confidential or incomplete transactions related to the company's operations.

However, if rumours have a significant effect on the prices of the company's financial instruments, the company will issue a stock exchange release to correct rumours or any materially incorrect information. If the company has delayed the disclosure of inside information and the confidentiality of the information cannot be ensured, the

company will publish the inside information as soon as possible through a stock exchange release.

3.6 Crisis communication

Digia has prepared operational and communication guidelines for crisis situations. Crisis communication is part of the company's risk management. The CEO is responsible for managing crisis communications. The CEO, CFO, General Counsel and Communications Manager, as well as the director or manager responsible for the function are immediately informed of any crisis situation. In a crisis situation, the principles of communication include openness, promptness and active approach, as well as the reliability of the disclosed information.

3.7 Communication languages

Digia's stock exchange releases and financial reviews are published simultaneously in Finnish and English. Press releases and other news are generally published in Finnish and English.

3.8 Communication channels and availability of information

Digia's website is the main and most important channel for up-to-date information. On its website, Digia's aims to provide reliable and up-to-date information, which enables market participants to form an accurate view of the factors and events affecting the prices of financial instruments issued by Digia.

Digia's communications function is responsible for submitting stock exchange releases to the Helsinki Stock Exchange and major media, as well as for distributing press releases to the media.

Stock exchange and press releases published by the company are available on the company's website for at least five years. Financial statements, reports of the Board of Directors, corporate governance statements, auditor's reports and half-yearly reports are available on the company's website for at least 10 years. Stock exchange releases are also archived in a news repository maintained by the Helsinki Stock Exchange.

4 Interpretations and derogations related to the disclosure policy

Monitoring and interpreting the disclosure policy is the responsibility of the CEO, who provides additional instructions on the practical implementation of the disclosure policy as necessary.