

**Disclosure Policy**  
*Unofficial translation from  
Finnish*  
20.12.2023

## Disclosure Policy

Approved in Fingrid Oyj's Board of Directors' meeting on 20 December 2023. The Board of Directors approves the Disclosure Policy every other year or as needed. The Disclosure Policy applies to all companies in the Fingrid Group unless the context dictates otherwise.

### 1 Introduction

Fingrid Oyj ("**Fingrid**" or "**Company**") has issued bonds listed on the Ireland and London Stock Exchanges. This Disclosure Policy approved by the Board of Directors supplements Fingrid's internal communications policy by describing the key principles and practices concerning securities market regulation, in accordance with which Fingrid communicates on bonds with the financial markets, the media and other stakeholders. The Disclosure Policy is reviewed regularly and is updated as needed.

In all of its reporting and communications, the Company complies with the valid rules, guidelines and regulations of the European Securities and Markets Authority (ESMA), the Central Bank of Ireland (CBI), the UK's Financial Conduct Authority (FCA) and the Finnish Financial Supervisory Authority, the Market Abuse Regulation ((EU) No 596/2014, "**MAR**"), the rules of the marketplaces where its financial instruments are listed ("**Marketplace Rules**"), and the obligations concerning the Company as stipulated in the Securities Markets Act, the Limited Liability Companies Act and other legislation. Additionally, the Company has voluntarily committed to comply with the Corporate Governance Code published by the Securities Market Association and Nasdaq Helsinki Oy's insider guidelines.

The Disclosure Policy principles apply to all companies in the Fingrid Group unless the context dictates otherwise. The Disclosure Policy is published on the Company's website in Finnish, Swedish and English.

### 2 Objectives of reporting

Fingrid's objective is to communicate with the financial markets in an open, timely, understandable, impartial and systematic manner on the Company's operations and factors affecting the value of the bonds.

Fingrid's investor communications' specific objective is to ensure that all financial market parties have simultaneous and immediate access to consistent, sufficient and relevant information on the Company and significant issues affecting its business, which can impact the value of the Company's financial instruments, and that the publicly disclosed information provides true and sufficient information on the Company's operations.

In its position as an issuer of listed bonds, Fingrid's disclosure obligation consists of a periodic and ongoing disclosure obligation. The Company publishes as a stock exchange release, without undue delay, inside information and the management's transactions and other matters that require reporting in accordance with the Marketplace Rules. Furthermore, the Company publishes as a stock exchange release matters that fall under the disclosure obligation, such as periodically published financial reports.

For other reporting, Fingrid uses press releases and the Company's website and social media, for example. Fingrid complies with the Company's values and operates in line with them also in its stock exchange releases – openly, fairly, efficiently and responsibly.

### **3 Periodic disclosure obligation**

Fingrid releases information subject to the periodic disclosure obligation in Ireland in accordance with the valid requirements, as Ireland is the Home Member State for the periodic disclosure obligation selected by the Company. Fingrid periodically releases as stock exchange releases:

- a Financial Statements Bulletin, Annual Review and Financial statements
- a half-year report; and
- the Management's Review from the first and third quarters.

Fingrid discloses its forecast of future development and business risks when publishing its Annual Review and financial statements.

### **4 Ongoing disclosure obligation**

#### **4.1 Inside information**

Fingrid publishes its inside information as a stock exchange release as soon as possible, unless it is considered necessary to postpone the publication and there are valid reasons for the postponement.

Inside information means precise and unpublished information, which is either directly or indirectly connected to one or more issuers or one or more financial instrument. This information, if it were released, would most likely have a significant impact on the prices of the financial instruments in question or the prices of the financial derivatives linked to them.

In the case of a bond issuer, it is assessed in particular whether the factor in question is one that has an impact on the issuer's solvency, liquidity or ability to meet its commitments.

Inside information is usually, among other things, information that the Company has not released, which is not otherwise available to the markets and which concerns:

- a significant change in Fingrid's result and financial position;
- an issue or event that has the potential to significantly impact Fingrid's solvency, liquidity or ability to meet its commitments;
- significant corporate restructuring, merger or demerger linked to Fingrid;
- premature redemption of Fingrid's bonds when the redemption impacts the price of the financial instruments;
- the buying of Fingrid's own bonds from the markets when the purchase impacts the price of financial instruments;
- Fingrid's credit rating when the credit rating agency has not published information on the credit rating; and
- a breach of Fingrid's contractual obligations, which can lead to the premature maturation, redemption or repayment of the Company's bonds.

Fingrid has a separate internal insider guideline approved by the Board of Directors for the processing of inside information and obligations related to inside information.

#### **4.2 Reporting directly related to bonds**

In addition, Fingrid publishes as stock exchange releases as soon as possible other information required by regulation and the Marketplace Rules:

- a notice of meeting for bondholders and the related power of attorney template;
- a change in the rights and terms and conditions related to the Company's bonds;
- a change in the number of bonds, their subscription, premature redemption or cancellation;
- a change in the maturity of the listed bonds;

- a change in the Company name;
- the Company's neglect of payments and decisions linked to the bankruptcy, default or interruption of payments; and
- an application to make the bonds subject to public trading on a regulated market or their removal from a list.

#### 4.3 Other ongoing stock exchange reporting

Fingrid systematically and without delay publishes also the following significant issues with a stock exchange release as part of its ongoing reporting:

- information on the General Meeting and proposals made to the General Meeting;
- changes in Fingrid's Board of Directors and auditing;
- information on the nomination of a CEO and the termination of office;
- information on transmission fees in the grid;
- transactions by the Company's executives and persons closely associated a Company's executive using the Company's financial instruments; and
- the investor calendar, which includes the publication dates of the Company's financial reports and the planned date of the Company's Annual General Meeting.

### 5 Releases

#### 5.1 Stock exchange releases

Releases that fall under the periodic and ongoing disclosure obligation are released as stock exchange releases.

The languages of the stock exchange release are Finnish, Swedish and English.

#### 5.2 Press releases and other communications

Fingrid communicates through press releases and on the Company's website and social media on issues and events related to the Company's operations as well as electricity markets and the power system, which it judges to be interesting to the general and professional media and the Company's stakeholders, but which do not require reporting through a stock exchange release.

The Company's press releases can be divided into different categories based on their subject matter. Through its disturbance reports, the Company publishes information on disturbances in the grid and transmission connections and on their repair.

Press releases are mostly in Finnish and English.

### 6 Responsibility for reporting

#### 6.1 Information released based on the disclosure obligation

Fingrid's Board of Directors is responsible, within the scope of its general duties, for ensuring that the Company's financial reporting and the reporting in line with the ongoing and periodic disclosure obligation comply with legislation and the Marketplace Rules and that they are otherwise appropriately arranged in the Company.

The company's President and CEO is responsible for carrying out Fingrid's disclosure obligation and investor communications, and can delegate the related tasks within the organisation. The CFO, General Counsel and Senior Vice President, HR and Communications, assist the CEO in carrying out the disclosure obligation and investor communications.

The Company's CEO and CFO are responsible for publishing stock exchange releases related to the Company's periodic and ongoing disclosure obligation.

The CEO or CFO approve the releases prior to their publication. Instead of the CEO and CFO, stock exchange releases can be approved by the General Counsel.

## 6.2 Other reporting

Fingrid's other reporting and communications consists of press releases and communications taking place on the Company's website and e.g., social media channels. In its other communications, the Company complies with its valid communications policy and other guidelines and practices concerning communications.

## 7 **Communication channels, websites and social media**

### 7.1 Publishing stock exchange releases

Stock exchange releases are published through a release distribution system that meets regulatory requirements and are submitted to the national central storage for regulated information (officially appointed mechanism, OAM), key media and to persons who have separately subscribed for releases. All releases are also published simultaneously on the Company's website.

### 7.2 Website

The main source of up-to-date information on Fingrid is the website <https://www.fingrid.fi/en/>. All of the Company's releases are available on the Company's website where they are made available when they are made public or otherwise published. The Company also makes available on its website brochures on the Company's bonds, supplements to them, the final terms and conditions and documents referred to in the brochures, information on credit ratings and material on any investor and analyst meetings.

The Company retains stock exchange releases, the Management's Reviews, information on the management's transactions and information on the periodic disclosure obligation Home Member State on its website for at least five (5) years.

The Company retains the half-year report, the Annual Review and financial statements, Auditor's Report, the Corporate Governance Statement, the Remuneration Report and the brochures and final terms and conditions related to the issue of bonds on its website for at least ten (10) years.

### 7.3 Communications in social media

Fingrid can utilise social media in its communications. The Company can make public on social media information published in a stock exchange release after the stock exchange release has been published. The company complies with valid securities market regulation in its social media releases. In conjunction with the issuing of financial instruments, the Company complies additionally with any guidelines provided by the arranger of the issuance.

## 8 **Timing of public disclosure**

### 8.1 Publishing stock exchange releases

Fingrid publicly discloses financial reports subject to the periodic disclosure obligation as stock exchange releases according to a predetermined schedule. Prior to the start of each financial period, the Company releases as a stock exchange release an investor calendar, which includes the Company's financial reports and the date for arranging the Company's Annual General Meeting. The investor calendar is also published on the Company's website.

The Company publicly discloses inside information as a stock exchange release as soon as possible, unless the Company's Board of Directors decides to postpone the publishing of the information. The headline of the stock exchange release in which the Company discloses inside information mentions that the information is inside information.

## **9 Investor relations**

### **9.1 Meetings and discussions**

The Company communicates openly with the financial markets and media and responds to the media's, investors' and analysts' questions without delay. Discussions like these are always based on previously disclosed information or information otherwise available to the markets. The information is not given selectively.

### **9.2 Credit rating agencies**

Information on the credit ratings agencies monitoring the Company are published and the credit ratings given by the credit rating agencies to the Company and its bonds are published on the Company's website. The opinions, estimates or forecasts on the Company or its bonds of the credit rating agencies are independently given by the credit rating agencies and they do not necessarily represent the Company's or its managements opinions, estimates or forecasts. The Company does not favour any specific credit rating agency or submit credit rating agency reports to the investment community.

## **10 Data leaks, market rumours**

Fingrid does not comment on incomplete matters, any publicly circulating rumours or its customers' activities unless it is unavoidable in order to rectify obviously false information.

If materially important information on the value of Fingrid's security appears publicly, the Company's CEO and CFO assess the situation and decide on the publication of a possible stock exchange release that provides more detail. If confidential and material information has been leaked publicly or the confidentiality of inside information cannot be guaranteed, the Company publicly discloses the matter in a stock exchange release as soon as possible.

## **11 Silent period**

The periodically published financial reports are preceded by a silent period, which begins 30 days before the publication date of the next financial report. During the silent period, the Company's representatives may not comment on the Company's financial situation, markets or future outlook. The silent period ends with the publication of the Financial Statements Bulletin, the Management's Review or half-year report.

If an event during the silent period (such as a significant business event) requires immediate public disclosure, Fingrid discloses publicly, without delay, the information in compliance with the regulations and practices concerning the obligation to disclose inside information and can comment on the event in question after the disclosure of the information. During the silent period, Fingrid can publish press releases and make posts on social media in which no comment is made on the Company's financial situation, markets or future outlook.

## **12 Interpretation and maintenance of the Disclosure Policy**

Fingrid's CEO or a person appointed by them is responsible for monitoring and interpreting the Disclosure Policy. In one-off cases and for material reasons, the CEO has the right to diverge from the Disclosure Policy, within the limits permitted by legislation and regulations. The Company's Board of Directors decides on amending the Disclosure Policy.