

VERKKOKAUPPA.COM OYJ

DISCLOSURE POLICY

Approved by the Board of Directors on 12 September 2025

Owner:	CFO
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1. Purpose

The purpose of this Policy is to describe the key principles that Verkkokauppa.com Oyj ("**Verkkokauppa.com**" or the "**Company**") follows in its investor communication and financial reporting and when communicating with its shareholders and other capital market parties, media, and other stakeholders.

In its communication and disclosure, the Company complies with the applicable EU and Finnish legislation, such as the EU Market Abuse Regulation (the "**MAR**"), the rules and guidelines of Nasdaq Helsinki Ltd, the regulations and guidelines of the European Securities Markets Authority and the Finnish Financial Supervisory Authority as well as the Company's internal policies and guidelines.

2. General principles

The key principles of the communication and disclosure of the Company are timeliness, consistency, impartiality, and transparency.

The purpose of the Company's investor relations function is to support the fair value of Verkkokauppa.com's financial instruments by providing the financial market with consistent, correct, relevant, and reliable information on the Company to ensure that capital market participants have transparent and clear picture of the Company, its operations, objectives, strategy, and financial situation. The aim is to guarantee that all market participants receive the information that the Company communicates simultaneously.

3. Disclosure of inside information

Verkkokauppa.com discloses inside information that directly concerns the Company by means of a stock exchange release as soon as possible unless

- the inside information concerns intermediate steps in a lengthy (protracted) process; or
- the disclosure of the inside information is delayed.

In accordance with the MAR, Verkkokauppa.com may on its own responsibility delay disclosure of inside information to the public provided that all the following conditions are met:

- immediate disclosure is likely to prejudice the legitimate interests of the Company;
- delayed information is not in contrast with the latest public announcement or other communications by the Company on the subject; and
- the Company is able to ensure the confidentiality of the information.

Where the confidentiality of the inside information has been lost or can no longer be ensured or, with respect to delayed disclosure, other conditions for delay are no longer fulfilled, the Company shall disclose the relevant inside information to the public as soon as possible.

4. Financial reporting

4.1 Periodic disclosure

Verkkokauppa.com discloses regularly information on the Company's operating income, balance sheet, financial position, future outlook, and other similar matters and their development primarily in its Financial Statements Release, Half-Year Report (H1) and Interim Reports (Q1 and Q3). The

Company may also publish an Annual Report. In addition, Verkkokauppa.com publicly discloses the Financial Statements, the Report of the Board of Directors (including the Sustainability Statement), the Auditor's Report, the Corporate Governance Statement, and the Remuneration Report.

Verkkokauppa.com publishes its financial reports according to a previously announced schedule. The publishing dates for the next financial year are disclosed prior to the start of each financial year and are available on the Company's website. The financial year of the Company is a calendar year.

4.2 Outlook

Verkkokauppa.com publishes, if so decided by the Board of Directors, an assessment of the Company's outlook and possible financial guidance in the Financial Statements Release. Verkkokauppa.com presents an assessment of the key factors and risks affecting the Company's outlook in the Financial Statements Release, the Half-Year Report and the Interim Reports. The estimates presented by the Company are based on the Company's view at the time of release on the likely future development of the Company. The Company will update its outlook and profit guidance if necessary in connection with the publication of the results, or in a profit warning issued as a separate stock exchange release.

4.3 Profit warnings

Verkkokauppa.com continuously monitors the Company's financial result, position, and outlook. A profit warning is disclosed as a stock exchange release when the Company reasonably expects that the outlook deviates from the previously released guidance and such deviation is likely to have a significant effect on the price of Verkkokauppa.com's financial instruments. The Board primarily decides on the issuance of a profit warning. The disclosure of a profit warning cannot be delayed.

5. Communication channels and types of releases

5.1 Communication channels

The primary communication channel for up-to-date information for all stakeholders is Verkkokauppa.com's website (<https://investors.verkkokauppa.com/en>). Verkkokauppa.com aims to provide on its website reliable and extensive information to enable investors to form an accurate understanding of the Company. The Company publishes also materials used in investor and analyst meetings on its website. The website includes information on, among other things, strategy and operating environment of the Company, the Company as an investment, governance, General Meetings, and the most important current events concerning the Company.

Verkkokauppa.com discloses information by means of stock exchange releases and press releases. The category of the release is determined based on the applicable regulations and this Policy. Verkkokauppa.com's stock exchange releases are published through a professional news distribution service provider (which entails distribution to e.g. Nasdaq Helsinki and key media), as well as on the Company's website where they will be made available in connection with the publication or other disclosure. The Company's press releases are published to key media and on the Company's website. Subscriptions for the Company's releases can be made on the Company's website. The releases are archived for at least five years and financial and other reports under regular disclosure obligation for at least ten years.

Verkkokauppa.com's official reporting language is Finnish. The stock exchange releases and financial reports, which are published under the disclosure obligation, are published in Finnish and English. Press releases are published in Finnish and possibly in other languages.

5.2 Releases published by Verkkokauppa.com

5.2.1 Stock exchange releases

A stock exchange release is published to disclose information on facts, matters, and circumstances that the Company believes are likely to have a significant effect on the price of Verkkokauppa.com's shares and other financial instruments. A stock exchange release is also used to publish other regulated information that is required to be disclosed by means of a stock exchange release pursuant to the rules of Nasdaq Helsinki.

Verkkokauppa.com publishes, among other things, the following information by means of a stock exchange release:

- Inside information;
- Financial Statements Releases, Half-Year Reports and Interim Reports;
- Annual reports including the Financial Statements, the Report of the Board of Directors, the Auditor's Report, the Corporate Governance Statement, and the Remuneration Report;
- changes in the amount of the Company's treasury shares;
- changes in the Company's previously communicated outlook and/or in the financial result and position;
- strategy and changes therein;
- material mergers, acquisitions, divestments, demergers, and other transactions involving the Company as well as other material contractual arrangements;
- proposals to the General Meeting by the Board of Directors and the Shareholders' Nomination Board, notices to the General Meeting, and resolutions of the General Meeting;
- changes in the Board of Directors, CEO, CFO, and Management Team of the Company;
- flagging releases;
- decisions on the introduction of share-based incentive plans;
- dates for the publication of the results;
- managers' transactions in accordance with MAR;
- information on material reorientation of the Company's business operations, restructuring schemes, and profit improvement programs;
- material transactions with related parties;
- material litigations and material regulatory proceedings and decisions or judgements given therein; and
- issues of shares or other financial instruments of the Company, public tender offers, share splits, or other changes in the number of shares.

Issuing a stock exchange release and the disclosure of inside information are based on an assessment of whether disclosure is required. For inside information concerning other than an intermediate step in a lengthy process, the assessment is conducted in parallel with an evaluation of whether the conditions for delaying disclosure are met.

5.2.2 Press releases

The Company publishes press releases on events related to the business of the company that do not meet the requirements set for a stock exchange release but are nonetheless regarded as being newsworthy or of general interest to media and the Company's stakeholders. The Company may also publish press releases on regional news.

Also invitations to publication of the results and capital market days (if any) are published as press releases.

5.3 Silent period

Verkkokauppa.com applies a silent period of three weeks (21 days) before the publication of Financial Statements Releases, Half-Year Reports, and Interim Reports. During this time the representatives of the Company do not meet with the capital market representatives or give interviews or comment on the financial standing of the Company or the Company's outlook. The dates of the publication of the results and silent periods are disclosed on the investor calendar on the Company's website.

Exceptions to this principle include the General Meetings, which may be held during a silent period, and the publication of stock exchange releases required by regulations, and related communications.

If during a silent period an event requires immediate disclosure, Verkkokauppa.com publishes the information without delay according to regulations regarding duty of disclosure and decides on a case-by-case basis whether to give interviews, while limiting such communication to the relevant event only.

6. Practices

6.1 Communication with investors and analysts

Verkkokauppa.com aims to actively meet with capital market and media representatives and, apart from the silent period, to answer enquiries from investors, analysts, and media without delay.

During meetings, information is provided within the limits of previously publicly disclosed information and accurately in accordance with such information. New undisclosed information, or complementary information that in conjunction with previously disclosed information could constitute inside information, shall not be provided at these meetings. Investor presentations are available on Verkkokauppa.com's website.

Verkkokauppa.com monitors market expectations continuously. The Company may review upon request models made by analysts but merely for factual accuracy and for public information. Verkkokauppa.com does not comment on or take any responsibility for estimates or expectations made by capital market representatives. The Company does not comment on its valuation or share price development.

6.2 Persons responsible and spokespersons

The Company's CEO, CFO and Head of Investor Relations comment on the financial situation and published outlook of the Company. Furthermore, members of the Management Team may give statements regarding their business areas, e.g. regarding product launch, in accordance with given instructions. The Chair of the Board primarily represents the Board. The CEO or other managers of the Company will not comment on matters belonging to the Board.

The Company's CFO is responsible for investor relations as a function. The CFO and the Head of Investor Relations are together responsible for the investor relations related compliance and disclosures. Verkkokauppa.com's investor relations function prepares and coordinates all meetings, events (such as capital market days), and presentations directed to shareholders, investors, and analysts and is responsible for the preparation of financial reports and stock exchange releases. The Head of Investor Relations manages enquiries from shareholders, investors, and analysts and comments on the operations and development of the Company, if needed.

6.3 Crisis situations

The Company's CEO is responsible for the management of crisis communication. Depending on the situation, communication can be centralized to a named person. The validity and quality of the information to be published, honesty and quickness are emphasized in crisis communication. If, according to the Company's estimate, a crisis situation is of material significance to investors, the Company will disclose the matter by means of a stock exchange release or a press release, depending on the situation.

6.4 Rumors, market speculation and information leaks

As a general policy, Verkkokauppa.com does not comment on market rumors or speculations, share price performance, competitors' or clients' actions, or analysts' assessments unless it is necessary to correct materially incorrect information that is likely to have a significant effect on the price of the company's financial instruments.

Where a rumor relates to inside information, and the rumor is sufficiently accurate to indicate that the confidentiality of inside information is no longer ensured, the Company will disclose the matter as a stock exchange release as soon as possible in accordance with the MAR and other applicable rules and regulations.

7. Insider Policy

Verkkokauppa.com's Insider Policy and insider administration is based on the MAR and other related rules and regulations, the regulations and guidelines of the Finnish Financial Supervisory Authority and the rules and guidelines of Nasdaq Helsinki. The Insider Policy addresses matters related to public disclosure of inside information and forms an integral part of this Policy.

8. Deviations

Within the framework of applicable laws and regulations, the Company has the right to, in particular circumstances, for compelling reasons, deviate from this Policy in which case the Company's CEO shall decide on the deviation.

9. Further information

Any questions regarding this Policy are to be raised with the CFO.

10. Validity

This Policy has been approved by the Board of Directors on 12 September 2025 and enters into force on the same date.

This Policy replaces and supersedes the Disclosure Policy approved by the Board of Directors on 15 July 2021.

Primary references

Insider Policy

Revision history

Version number	Amendment date	Key amendments
1.0	n/a	Original version
2.0	15 June 2026	Updated sections 3, 5.2.1 and 6.4 due to a MAR amendment re. disclosure of inside information (Listing Act). Reformatted to align with the Company's official policy template.