

Delete Group Oyj

DISCLOSURE POLICY

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1. General

Delete Group Oyj's bond will be rated on Nasdaq Helsinki. Delete's Disclosure Policy follows the rules and recommendations of Nasdaq Helsinki; the provisions of the Limited Liability Companies Act, the Securities Markets Act and other relevant legislation; the EU's Market Abuse Regulation and other lower-level regulations based on it; as well as the guidelines provided by the Finnish Financial Supervisory Authority and the European Securities and Markets Authority.

Delete Group Oyj's Disclosure Policy describes the policies and procedures in accordance with which Delete operates with regard to different parties on the capital market. The Company aims to ensure that all market parties will have simultaneous and immediate access to essential and sufficient information for the valuation of the Company's bond.

This policy will be reviewed on a regular basis and amended if necessary.

2. Duty of disclosure and the general principles of communication

In all its operations, Delete Group Oyj adheres to Finnish and EU legislation, the rules of Nasdaq Helsinki Oy, the guidelines given by the Finnish Financial Supervisory Authority and Delete's own management policy.

Communication by the Company is based on facts. As a general principle, communication shall be transparent, open, honest, equal and active. The Company shall communicate both positive and negative issues in a consistent way simultaneously to all its stakeholders. The goal is to provide correct and sufficient information regarding the Company's operations as early as possible. The aim is to provide a realistic view of the Company's operations, operating environment, strategy, objectives and financial performance.

The duty of disclosure pursuant to EU's Market Abuse Regulation, the Securities Markets Act and other applicable regulations and guidelines may be divided into a regular and a continuous duty of disclosure. A regular duty of disclosure shall refer to the Company's duty to provide on a regular basis information regarding its performance and economic situation. This shall apply to the publication of interim reviews, half year interim reports, financial statements bulletin and financial statements. A continuous duty of disclosure shall refer to all required communication regarding insider information pertaining to the Company, that is, information which in all likelihood would have a significant impact on the price of the Company's financial instruments, such as its bond and the related financial instruments.

The publication of insider information on the market shall adhere to the following principles:

- a) Insider information shall be published as soon as possible;
- b) In compliance with the Market Abuse Regulation the company shall as soon as possible publish the insider information concerning the company or decide on the delaying the disclosure;
- c) Communication shall take place in a consistent and precise manner so as to enable the recipient to assess the impact of the information on the Company's economic situation and future;
- d) All stakeholders shall receive the information at the same time and the information shall be made public in a strictly controlled manner: for instance, first Nasdaq Helsinki and the key media and only then other parties;
- e) All notifications shall be published on the Company's website; and
- f) All information shall be published in Finnish and English.

Financial information

Delete Group Oyj shall publish information regarding its economic situation in accordance with an annual schedule published in advance. The publication dates of the next financial period shall be published prior to the end of the previous financial period. The financial information and statistics shall be published at the Group level in Finnish and English.

Information regarding the economic situation, the balance, the financing position, outlook, the development of profitability or other essential information pertaining to the Company's operations or operating environment shall be primarily communicated in interim reviews, half year interim reports and financial statements bulletin. If information pertaining to the aforementioned matters is provided between the interim reviews, half year interim report and financial statement bulletin, and the said information is insider information, it shall always be published as a stock exchange release.

Disclosing insider information and decision on delaying the disclosure of the insider information

Delete Group Oyj shall disclose insider information directly pertaining to the Company as early as possible. The decision on disclosure or delaying the disclosure of insider information shall be made by the Group's CEO, CFO and the members of the Board of Directors two together (Disclosure Committee). Decisions regarding publication shall be made by the Disclosure Committee.

Delete Group Oyj publishes the insider information directly pertaining the Group by a stock exchange release as soon as possible unless the Group decides to delay the disclosure.

The following information may constitute insider information:

- any essential change in the Company's result and/or financial position (positive or negative);
- any essential change in the Company's operations and strategy;
- a merger or demerger of the Company or other significant corporate arrangement or acquisition;
- 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; and
- any information that has essential effect on the valuation of the Group such as major court proceedings or authority decisions or guidelines or agreements related thereto.

In accordance with the Market Abuse Regulation Delete Group Oyj may decide to delay the disclosure of insider information if all of the following requirements are met:

- 1) The immediate disclosure of the information would probably risk the Company's legitimate interests;
- 2) Delaying the disclosure is unlikely to mislead the public; and
- 3) The Company can guarantee that the said information shall remain confidential.

The decision on delaying the disclosure of insider information is made by the Disclosure Committee. The decision shall be made on the basis of an assessment carried out by the Disclosure Committee on whether the requirements for delay have been met. The assessment and the decision to delay shall be made in writing, the decision shall be dated (incl. the time) and the assessment and the decision shall be stored for a minimum period of five (5) years from the date of the decision. The Company's General Counsel shall be responsible for the storage. The Disclosure Committee shall continuously monitor that the preconditions for delay are met so as to ensure that the Company shall have the readiness to immediately disclose the information in case the preconditions for delay are no longer in effect. Once the insider information has been disclosed, the Company shall notify the Finnish Financial Supervisory Authority in accordance with its guidelines. When the Disclosure Committee makes a decision to delay disclosure, a project-specific insider list shall be drawn up with regard to the insider information in question.

Rumours, market evaluations and information leaks

As a rule, Delete Group Oyj shall not comment on potential rumours circulating on the market, the price development of the bond, the activities of competitors or customers nor the evaluations of analysts except for correcting obviously incorrect information linked to the Company's operations. Neither does the Company comment on potential commercial transactions in progress. However, if a rumour is clearly linked to insider information, the disclosure of which has been delayed, and the rumour in question is sufficiently accurate to indicate that

the confidentiality of the said information can no longer be guaranteed, the Company shall disclose the information using a stock exchange release as soon as the Company has become aware of the issue.

Contact with investors, analysts and the media

The goal of Delete Group Oyj is efficient communication between the Company and different capital market parties. The objective of communication directed at the capital market is to ensure that there is relevant information available on the market regarding the Company and its bond in order to evaluate the fair value of the bond.

With the exception of a silence period, the Company aims to respond without undue delay to all routine queries from bond holders, investors, analysts and the media. Only the CEO of Delete Group Oyj shall have the right to make public announcements regarding essential information linked to the Company. The Company shall not comment on the valuation of the Company or the price or price development of the bond or other financial instruments.

The Company's Management Team shall meet with investors and analysts on a regular basis at road shows and meetings where the Company and its operations, strategy and financial result are discussed. Information disclosed by the Management Team of the Company at meetings and company presentations aimed at investors and analysts is limited to things that have already been published or which are commonly known on the market.

Silence period

With regard to communication, Delete Group Oyj shall observe a silence period which begins 30 days before the publication of interim review, the half year interim report and the financial statement bulletin. During the silence period, Delete Group Oyj shall not comment on the Company's economic situation, markets or future prospects. During the period, the Management Team of the Company shall not meet with representatives of the capital market or the financial media or comment on the Company's economic situation or common views. Silence periods are shown in the investor calendar on the Group's investor website.

Outlook

Delete Group Oyj shall publish an annual view on the Company's outlook at the market. The outlook for the next year shall be communicated at the latest in the financial statement bulletin. The outlook expressed is based on Management's current view on the development of the Group and the functions of Group companies. Actual results may differ from the statements and assessments. The Company's outlook is published on the Company's website and in the interim reviews, half year interim report, financial statements bulletin and the annual report. Valid market outlooks are available on the Company's investor website at www.deletegroup.fi.

Profit warning

Delete Group Oyj shall give a profit warning as soon as possible in case the Company estimates that the development of its result or economic situation has materially changed for the better (a positive profit warning) or the worse (a negative profit warning) than previously published by the Company.

The need for a profit warning shall be assessed and decided by Delete Group Oyj and the Group CEO together with the Chairman of the Board of Directors.

A stock exchange release shall always be given for a profit warning.

3. Roles and responsibilities

At Delete Group Oyj, investor relationships and compliance with the securities markets legislation are the responsibility of the Group CEO and the Company's Board of Directors. The Group CEO shall be responsible for monitoring and interpreting the Company's Disclosure Policy. If necessary, the Group CEO or a person appointed by the Group CEO shall provide further instructions on the practical implementation of the Disclosure Policy.

The primary source of announcements regarding interviews and meetings regarding the Company is the Group CEO. At the Group CEO's request, other representatives of the Company may also attend events and meetings.

4. Notifications published by Delete Group Oyj

Notifications published by Delete Group Oyj are divided into two categories: stock exchange releases and press releases published on the Company's investor website www.deletegroup.fi. In addition, the Company shall publish current news of interest to the Company's stakeholders on the Company's website at www.delete.fi under 'News'.

Stock exchange releases

As early as possible, Delete Group Oyj shall use stock exchange releases to publish information on issues, activities or events pertaining to the Company's operations that are insider information or should otherwise be published in a stock exchange release, for instance, at the request of the stock exchange.

These include:

- Financial reports and interim half-year financial statements
- Important strategic changes
- Important changes in the Company's financial or common future prospects
- Significant orders and agreements received by Group companies
- Important acquisitions, corporate sales and established joint ventures
- Important investments
- Changes in the Group's Board of Directors and the composition of the Management Team
- Change of auditors

- Events with a material effect on financial performance
- Other important factors affecting business operations
- Other matters that should be published using a stock exchange release in accordance with Nasdaq Helsinki's current rules

Delete Group Oyj's Group CEO shall approve stock exchange releases prior to their publication.

Press releases

Delete Group Oyj may also use press releases to communicate events pertaining to its operations. Press releases provide information about matters, which do not meet the requirements of a stock exchange release but which are deemed newsworthy or otherwise of interest to the Company's stakeholders. The publication of press releases shall be decided by the Company's communications department together with the person in charge of the function in question and the Group CEO.

In addition to stock exchange releases and press releases, Delete Group Oyj shall publish current news on the Group for all stakeholders at www.delete.fi.

5. Channels

Delete Group Oyj shall publish as early as possible all information, which is insider information and which may therefore have a material effect on the value of the Company's bond and other financial instruments. In addition to the stock exchange releases and press releases published at Group's investor webpages www.deletegroup.fi, the Company's website www.delete.fi acts as an important channel for publishing information regarding the Company's operations and finances.

Delete Group Oyj shall publish stock exchange releases and press releases via Nasdaq Helsinki and key media outlets. All stock exchange releases and press releases shall be simultaneously published on the Group's investor website in Finnish and English.

In order to ensure that all stakeholders shall have access to the information at the same time, the Company shall also make public the materials used in potential events used for announcing the Company's result or conferences for analysts on its website as simultaneously as possible.

6. Insiders guidelines and closed window

In matters pertaining to insiders, Delete Group Oyj shall comply with the applicable legislation and regulatory guidelines as well as the insider guidelines provided by Nasdaq Helsinki and Group's Insider Guidelines approved by the Board of Directors of the Company. Insider guidelines regulates among other things on delaying of the disclosure of the insider information.

Persons in management roles at Delete Group Oyj (members of the Board of Directors, the Group CEO and the Group Management Team) as well as certain persons involved in drawing up the Company's financial reports ("Insiders") are not allowed to trade securities issued by the Company or engage in certain other business transactions pertaining to the Company's financial instruments within 30 days prior to the publication of the Company's interim review, half year interim report or financial statements bulletin (the so-called 'closed window').

The communication rules shall also apply to the employees of Delete Group Oyj. If employees of the Company become aware of insider information pertaining to the Company, the said persons shall be informed that they shall also be subject to the Company's insider rules. After this, they shall be added to the Company's insider list. In connection with the introduction to the stock exchange, company personnel have received training regarding insiders of a listed company and on how a listed company should act with regard to its duty of disclosure. Written guidelines created for the training are available on the Company's intranet. The training materials are included in the orientation package for new employees.

7. Interpretation

This Disclosure Policy is approved by the Board of Directors of the Company. The CEO of the Group is liable for the control and interpretation of the Disclosure Policy. If needed the CEO of the Group will give further instructions on implementation and interpretation of the Disclosure Policy.

The policy approved by: Delete Group Oyj's Board of Directors
Person in charge of the policy: Group CEO
The policy was first approved on: 28 February 2018