F-Secure Disclosure Policy

1. Purpose
This Disclosure Policy describes the principles and procedures applicable to F-Secure’s external communications to the financial markets.

F-Secure’s financial instruments are listed in Nasdaq Helsinki Ltd. In its communication, F-Secure complies with Finnish and EU legislation, the regulations and guidance of European and Finnish Financial Supervisory Authorities, Finnish Corporate Governance Code as well as its internal policies.

The goal of F-Secure’s external communications is to ensure that relevant and accurate information about the company is disclosed to the financial markets on a timely manner and non-selectively to all participants. F-Secure strives to provide good service and to meet actively with capital market representatives.

This Disclosure Policy has been approved by the Board of Directors on May 2019.

2. Communications Principles

Spokespeople
F-Secure’s financial situation and performance, its markets as a whole and its future outlook are commented on by F-Secure’s CEO and the CFO or a person designated by them. Investor Relations centrally handles the communications with investors and analysts.

Discussions and meetings
F-Secure actively engages with representatives of capital markets and the media, replying to queries by investors, analysts and the media without unnecessary delay. Discussions are always based on information already made available to the markets. Investor relations coordinates communication with investors and analysts, whereas meetings with the media are coordinated by corporate communications.

Channels
F-Secure publishes stock exchange releases via the Helsinki Stock Exchange and main media channels, and distributes press releases to the media. Stock exchange releases and investor news are made available on the company’s website (www.f-secure.com/investors) as soon as they are published.

Availability
All F-Secure’s stock exchange releases can be found from the website for at least five (5) years from the date of the publication. Annual financial statements, management reports, auditors’ reports, interim reports and corporate governance statements are available at the website at least for ten (10) years.

Language
The official reporting language of F-Secure is Finnish, but the company publishes all stock exchange releases also in English. Some of the materials used at investor events are available only in English.

Silent Period
F-Secure observes at least a three-week (21 days) silent period prior to publication of financial reports during which it refrains from engaging in discussions with capital market representatives or the media regarding F-Secure’s financial position or the factors affecting it.
3. Releases published by F-Secure

Stock Exchange Releases

**Financial reporting and other periodic reporting**

F-Secure publishes its financial reports according to a predetermined schedule: two interim reports, a half-yearly report and an annual financial statements release. Auditors’ report shall be disclosed together with the annual financial statement. Furthermore, F-Secure publishes annually a statement on corporate governance and non-financial information. A remuneration report is published as part of the corporate governance statement.

The publication dates for financial reports are announced prior to the end of the previous financial period.

**Ongoing reporting**

**Inside information**

F-Secure publishes a stock exchange release as soon as possible of any inside information concerning F-Secure. Inside information means information of a precise nature, which has not been made public, relating, directly or indirectly, to F-Secure and which would be likely to have a significant effect on the price of F-Secure financial instruments (definition of EU Market Abuse Regulation, MAR). What constitutes inside information is analyzed case by case based on relevant facts and circumstances. Inside information may not be disclosed to analysts, journalists, or any other parties, either individually or in groups, without making the same information public to the market.

F-Secure may justifiably delay the disclosure of inside information under the following conditions:

- Immediate publication is likely to prejudice the legitimate interests of F-Secure,
- Delay of disclosure is not likely to mislead the public, and
- The confidentiality of the information can be safeguarded.

The decision to delay the disclosure is always made in accordance with the regulatory requirements. The decision can be made by the authorized persons only and it will be documented and archived accordingly. The information shall be published as a stock exchange release as soon as possible after the conditions of delaying the disclosure are not anymore met.

**Other regulatory stock-exchange releases**

Stock exchange releases are also used to publish regulated information that is required to be disclosed (such as management transactions, changes in the number of own shares, flagging notifications etc.).

**Rumors and information leaks**

F-Secure does not typically comment on market rumors. However, if a market rumor significantly impacts the company’s stock price, the company may consider issuing a statement in order to provide accurate information to the markets or to rectify incorrect or misleading information.

In certain situations a rumor may explicitly relate to inside information which has not yet been made public (delayed disclosure). If the rumor is sufficiently accurate to indicate that the confidentiality of that information is no longer ensured, inside information is disclosed to the markets as soon as possible.

**Outlook and profit warnings**

F-Secure may release forecasts on the group’s likely future financial performance (Outlook). Outlook is based on views at the time of the release regarding the development of the group and its business operations.

F-Secure constantly monitors the company’s financial performance, position and outlook. In the event that F-Secure financial position deviates in an unexpected and significant positive or negative way from what has been publicly forecasted, F-Secure will publish as a stock exchange release as soon as possible.
Press releases and investor news

Press releases are used to announce matters which do not meet the criteria for stock exchange releases but are deemed to be of value as news items. Press releases can be published globally or regionally, and they are also typically published on F-Secure’s website.

Investor news are published in the stock-exchange release section of F-Secure’s Investor relations website and distributed to the main media outlets, and are typically related to invitations to quarterly result info sessions as well as other investor-focused events (such as the CMD).

4. Changes to the Disclosure Policy

This policy will be revised and amended as necessary. F-Secure may also adopt more detailed internal guidelines and processes to ensure compliance with this policy and relevant laws and regulations.