

Insider guidelines

COMPONENTA

Insider guidelines

Componenta Corporation complies with the Guidelines for Insiders published by Nasdaq Helsinki in the form valid at any given time, complemented with the specifications applicable to Componenta Corporation given below.

Nasdaq Helsinki's Guidelines for Insiders 2018

Specifications applicable to Componenta Corporation:

Insider list

Componenta maintains a project-specific insider list of any projects which, if realised, are likely to have a significant effect on the value of Componenta's shares, financial instruments or the derivatives related to them. Regarding their scope or nature, such projects are clearly different from the company's normal business. Every person with access to inside information related to the project is recorded in the project-specific inside list. A person named in the project-specific list may not disclose the inside information to outsiders, trade or engage in transactions with Componenta's financial instruments or advise others in relation to the aforementioned.

Other insider situations

Every Componenta employee or other person with access to inside information concerning Componenta, even when such information has been obtained coincidentally, is always covered by the scope of the prohibitions and restrictions applicable to the use and disclosure of inside information. The person with access to inside information may not disclose the inside information to outsiders, trade or engage in transactions with Componenta's financial instruments or advise others in relation to the aforementioned.

Notification obligation

In accordance with the applicable legislation, the persons discharging managerial responsibilities in Componenta (the Board of Directors, President and CEO and the Corporate Executive Team) and the persons closely associated with them notify Componenta and the Financial Supervisory Authority of any trading and other transactions related to Componenta's shares or debt instruments or related derivatives or other financial instruments made on their own account no later than within three days of the transaction. Componenta makes public disclosures on the aforementioned trading and transactions in accordance with the applicable legislation.

Trading restriction

The persons discharging managerial responsibilities in Componenta (the Board of Directors, President and CEO and the Corporate Executive Team) may not, on their own account or for a third party, directly or indirectly, engage in trading and other transactions related to Componenta's shares or debt instruments or related derivatives or other financial instruments (closed window). The period in question commences 30 days prior to the release of financial statements, an interim report or half-year financial report and ends when the financial statements, an interim report or half-year financial report is published.

In addition, Componenta has separately determined certain individuals involved in the preparation of its financial reports, who may not, on their own account or for a third party, directly or indirectly, engage in trading and other transactions related to Componenta's shares or debt instruments or related derivatives or other financial instruments (closed window). The period in question commences 30 days prior to the release of financial statements, an interim report or half-year financial report, and ends when the financial statements, an interim report or half-year financial report is published.

Management of insider issues

Componenta Corporation's Insider Guideline, composed of the Guidelines for Insiders published by NASDAQ OMX Helsinki and these specifications, is available on the company's Internet and intranet pages. Componenta Corporation, furthermore, has internal procedures in place for the projects referred to in the Insider Guideline.

Tasks of insider management

The company's insider management is in charge of the following tasks:

- company internal communication of insider issues
- the provision of training on insider issues in the company
- receiving notifications concerning persons discharging managerial responsibilities
- preparing and maintaining project-specific insider lists
- monitoring insider issues

The person responsible for insider issues in the company is its General Counsel. Company's CFO acts as deputy. Group's Legal Counsel acts as the administrator of the company's insider list.

Company's General Counsel is responsible for trading restriction as well as notification and publishing obligations regarding the transactions conducted by the persons discharging managerial responsibilities.

The persons discharging managerial responsibilities are under an obligation to inquire in advance if there are any possible obstacles for transactions with Componenta's financial instruments.

Insider management provides advice and training on insider issues as necessary. Despite this, every insider is personally responsible for complying with the applicable laws, regulations and instructions.

Entry into force

Componenta Corporation's Insider Guideline as detailed above has been approved by Componenta Corporation's Board of Directors and takes effect as of 8 June 2017.

TE

ES

COMPONENTA