



Terveystalo Disclosure Policy

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Introduction

The disclosure policy of Terveystalo Plc ("Terveystalo" or "Company") describes the general principles and procedures that the Company adheres to in its communication with capital market participants and financial reporting. This disclosure policy has been adopted by the Board of Directors of Terveystalo to apply as of 26 April 2024.

In its communication and disclosure, Terveystalo complies with applicable EU and Finnish legislation, the rules of Nasdaq Helsinki Ltd and its guidelines, the regulations and guidance of the European Securities and Markets Authority ("ESMA") and the Finnish Financial Supervisory Authority, the Finnish Corporate Governance Code as well as the Company's internal policies and guidelines.

Disclosure principles

The main principles of Terveystalo's communication are purposefulness, transparency, fairness, and activeness. The Company communicates both positive and negative information consistently and simultaneously to all market participants.

Terveystalo's Investor Relations function aims to support the correct value creation of Terveystalo's financial instruments by providing the capital markets with timely, reliable, accurate, and up-to-date information on the Company's operations, operating environment, strategy, objectives, and financial performance. Terveystalo discloses all information related to the fulfilment of disclosure obligation to the public without undue delay following the applicable regulations.

All releases are published on the Company's website and other applicable distribution channels. All information is disclosed to the public in Finnish and English.

Public disclosure of inside information

Terveystalo publicly discloses inside information, which directly concerns Terveystalo, through a stock exchange release as soon as possible unless the disclosure of inside information is delayed. Under the Market Abuse Regulation ((EU) No 596/2014, MAR), Terveystalo may on its own responsibility delay the disclosure of inside information to the public if all of the following conditions are met:

1. immediate disclosure is likely to prejudice the legitimate interests of Terveystalo
2. delayed disclosure is not likely to mislead the public; and
3. Terveystalo can ensure the confidentiality of this information.

The Company shall assess on a case-by-case basis whether the conditions for delaying disclosure are met. If all the conditions listed above are not met, the Company must publicly disclose the inside information as soon as possible through a stock exchange release.

In connection with the delayed disclosure of information, Terveystalo shall document the conditions for the delayed disclosure and publicly disclose the information as soon as possible after the conditions are no longer met. The Finnish Financial Supervisory Authority shall be notified about the decision to delay the disclosure of information immediately after the public disclosure.

The evaluation of insider information and delayed disclosure is described in Terveystalo's Insider policy.

Periodic disclosure

Terveystalo regularly provides information regarding its financial performance by publicly disclosing a half-yearly report, two interim reports, a financial statements release, financial statements, a report of the Board of Directors including a sustainability statement as well as an Auditor's Report. These reports are prepared following the IFRS and ESRS requirements and measurement principles. These reports are the primary sources of information on the financial performance, balance sheet, financial position, prospects, and other related information on Terveystalo. The financial year of Terveystalo is a calendar year.

Terveystalo has an option to disclose an Annual Report. Additionally, Terveystalo discloses all other information required by the applicable laws and regulations. Terveystalo publishes its Corporate Governance Statement and Remuneration Report on its website. Other content required by the Finnish Corporate Governance Code is also available on Terveystalo's website.

Terveystalo publicly discloses the financial statements release, the half-yearly report, and the interim reports according to a previously announced schedule. The schedule is disclosed before the end of the previous financial year and is available on the Company's website.

Types of releases and communication channels

The primary communication channels of Terveystalo consist of publicly disclosed stock exchange releases, published press releases and other releases and news, the Company's website, and different meetings and events.

Terveystalo always publicly discloses inside information through a stock exchange release. A stock exchange release is also used for the public disclosure of periodic information and other regulated information. Managers' transactions are publicly disclosed as stock exchange releases.

Information that does not meet the requirements set for stock exchange releases, but which Terveystalo considers newsworthy or in other ways of interest to the Company's stakeholders is published as a press release.

Distribution and availability of releases

Terveystalo publishes stock exchange releases without undue delay. The stock exchange releases are published on the Company's website and submitted to Nasdaq Helsinki and the principal media. The main source of information about Terveystalo is the Company's website www.terveystalo.com. Terveystalo provides comprehensive information on its website to help investors form an accurate picture of the Company. The Company also uses press releases, publications, and social media channels to disseminate information about the Company. Corporate Communications manage these channels.

Terveystalo Communications is responsible for the Company section of the website and the preparation, publication, and distribution of Terveystalo's releases.

The financial statements, report of the Board of Directors, Corporate Governance Statement, Remuneration Report, Auditor's Report, and half-yearly, interim, and other financial reports are available

on the Company's website for at least 10 years. All other regulated information and other published information will be kept available on the Company's website for at least 5 years.

Practices

Communication with investors and analysts

The Company regularly meets and proactively interacts with capital market participants and representatives of the media. Apart from the silent period, Terveystalo responds to queries submitted by shareholders, investors, analysts, and media as soon as practicable.

During meetings, information is provided within the limits of previously publicly disclosed information and accurately following such information. New yet undisclosed information, or complementary information that in conjunction with previously disclosed information could constitute information, that could be regarded as inside information, shall not be provided at these meetings. The investor presentations are available at the Terveystalo website.

Terveystalo monitors market expectations continuously. The Company will review upon request the models made by analysts but merely for factual accuracy and public information. Terveystalo does not comment or take any responsibility for estimates or expectations made by capital market representatives. The Company does not comment on the Company valuation, or the value or value development of the Company's financial instruments, give preference to any analyst, or distribute analyst reports to the investment community.

Responsible persons and spokespersons

Terveystalo's CEO, CFO, and Vice President of Investor Relations are primarily responsible for contacts with investors, shareholders, and analysts. These persons and the Head of Communications are Terveystalo's main spokespersons. Other Company representatives may participate in investor relations activities at the request of the Investor Relations Department. Neither the CEO nor any other management of the Company comments on matters concerning the Board of Directors of Terveystalo. The Board is generally represented by the Chairman of the Board.

Terveystalo's Investor Relations function prepares and coordinates all events and presentations for shareholders, investors, and analysts, as well as their implementation and supporting material. The Group Communications Department coordinates and handles all inquiries from the media.

Silent period

Terveystalo's silent period begins 30 calendar days before the publication of the financial statements release, half-yearly report, or interim report. During the silent period, the results and factors affecting them are not discussed with representatives of the capital markets or the media. The silent period shall end with the publication of the financial statements release, half-yearly or interim financial report.

Exceptions to this rule are the annual general meeting (if held during the silent period) and the announcement of a stock exchange release on a significant business event and related communications; such communications are limited to the event in question.

Rumours and leaks

Terveystalo does not comment on market rumours, media speculation, share price developments, the actions of competitors or customers, or analysts' forecasts. However, Terveystalo may publish a stock exchange release to correct false or misleading information that is likely to have a significant impact on the price of the Company's financial instruments.

If inside information, the disclosure of which Terveystalo has delayed under the MAR, has been leaked before its disclosure, has fallen into the hands of someone who is not, by virtue of the regulations concerning insiders or other rules, authorised to receive such information, or its confidentiality can no longer be ensured, Terveystalo will as soon as possible publish the inside information through a stock exchange release.

In a situation where a rumour is clearly related to inside information the disclosure of which has been delayed, and the rumour is sufficiently specific to indicate that the confidentiality of such information can no longer be ensured, Terveystalo shall publish the inside information through a stock exchange release as soon as possible.

Reporting languages

Terveystalo's official reporting language as a listed company is Finnish. Terveystalo publishes all information covered by the disclosure obligation in Finnish and English.

Financial outlook and guidance

Terveystalo publishes guidance to the market on the Company's outlook on an annual basis. The guidance covers the expected development of the Company's revenue and profitability. In addition, Terveystalo provides information on key issues that may affect the development of the Company's revenue and profitability. The outlook for the coming year will be announced at the latest when the financial statements release is published. The statements and estimates presented are based on management's view of the development of the Group and its operations at the time they are made. Actual results may differ materially from these statements and estimates. In the event of a change in the Company's outlook that is likely to have a significant impact on the price of Terveystalo's share or other financial instruments, the change will be disclosed as soon as possible in the form of a profit warning in a stock exchange release (see below under "profit warning"). Terveystalo's guidance is published on the Company's website, in interim reports, half-yearly reports, financial statement releases, and investor presentations.

Profit warning

If it is likely that the Company's development during the period under review will differ from what it has previously publicly estimated or what can reasonably be concluded from other information previously published by it and the change is likely to have a significant impact on the price of Terveystalo's share or other financial instruments, Terveystalo will issue a profit warning in the form of a stock exchange release as soon as possible.

The issuance of a profit warning cannot be postponed.

In principle, Terveystalo's Board of Directors decides on the issuance of a profit warning.

Crisis communication

Terveystalo's communication principles and responsibilities in emergency and crisis situations are defined in the Company's crisis communication guidelines. Terveystalo's crisis communication is led by the Company's Head of Communications.

Insider policy

Terveystalo has adopted an insider policy that applies to all of its employees, executives, directors, and members of the Board of Directors. A description of the Company's insider administration is available on the Company's website.

In its insider policy and insider administration, Terveystalo complies with the requirements outlined in MAR and other applicable EU regulation, guidance given by ESMA, Finnish legislation, Nasdaq Helsinki Ltd.'s rules and guidelines for insiders, the regulations and guidelines of the Finnish Financial Supervisory Authority, and the insider policy approved by the Board of Directors of the Company.

Members of Terveystalo's Board of Directors and Executive Team as well as certain other personnel at Terveystalo shall not on their account or for the account of a third party, directly or indirectly, conduct transactions relating to the financial instruments of the Company within a time period beginning 30 days before the disclosure of a financial statements release, half-yearly report, and interim report, including the day of disclosure.

Terveystalo shall draw up an insider list for projects that involve inside information. Insiders are given a written notice of their insider position and insider guidelines.

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Interpretations and discrepancies

The CEO is responsible for the supervision and interpretation of Terveystalo's Disclosure Policy. The CEO or his/her designee will provide further guidance on the implementation of the Disclosure Policy. Within the framework of applicable laws and regulations, the CEO has the right to deviate from the disclosure policy in individual cases for compelling reasons.