

Insider Administration

Given the nature of Sampo's business areas, especially bearing in mind their extensive investment activities, Sampo's Board of Directors has approved separate Guidelines for Insiders that is binding on all persons employed by Sampo Group as well as on members of Sampo's Board of Directors. In addition to current supranational law, such as the market abuse regulation (MAR), applicable national law, including Nasdaq Helsinki's Guidelines for Insiders and the Financial Supervisory Authority's regulations, has been taken into account in compiling the Guidelines for Insiders.

The Group Executive Committee and persons working with financial reports and persons having access to such documents before publication thereof are under the following restrictions on trading:

- persons must obtain a separate written permission in advance for each share related securities transaction they make with the securities of Sampo plc or any of Sampo's publicly listed subsidiary or affiliate company,
- persons must not conduct any transactions relating to the

- financial instruments of Sampo Group during a closed window of 30 calendar days before the announcement of financial report (so called extended closed window), and
- persons are prohibited from having so called short-term positions, which refers to a situation where the period between the acquisition and disposal or the disposal and the acquisition of the same shares is less than one month.

In addition to regulatory supervision, compliance with the obligations under Sampo Group's Guidelines for Insiders and the underlying legislation is supervised by Insider Administration, which is a group function centralized in Sampo plc and led by the person in charge of insider matters.

Topdanmark AS, which became Sampo plc's subsidiary as of 30 September 2017, has as Nasdaq Copenhagen listed entity its own insider procedure applicable to Topdanmark's financial instruments as required by Danish regulations.

Sampo Group's Guidelines for Insiders is available on the group's website at www.sampo.com/insiders.