

**MARIMEKKO CORPORATION**

**DISCLOSURE POLICY**

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## 1 Introduction

In its communications, Marimekko complies with applicable EU and Finnish legislation, the rules and guidelines of Nasdaq Helsinki Ltd, the regulations and guidelines of the European Securities and Markets Authority and the Finnish Financial Supervisory Authority, as well as the company's internal policies and guidelines.

The purpose of this Disclosure Policy is to describe the key principles observed by Marimekko in its investor communications and financial reporting and when in dialogue with its shareholders, other capital market participants, the media and other stakeholders.

This Disclosure Policy is updated and amended as necessary.

## 2 Objectives and key principles

Marimekko's key principles in investor communications are timeliness, consistency, impartiality and transparency.

The objective of the company's investor communications is to support the fair value formation of Marimekko's financial instruments by providing the capital markets with consistent, accurate, material and reliable information on the company, its operations, operating environment, strategy, objectives and financial position. The company communicates both positive and negative information consistently and simultaneously to all market participants.

## 3 Disclosure of inside information

Marimekko discloses inside information directly concerning the company by means of a stock exchange release as soon as possible in accordance with the EU Market Abuse Regulation ((EU) No 596/2014, "MAR"). Under MAR, inside information relating to intermediate steps of a protracted process shall be disclosed as soon as possible after the final event or final set of circumstances of the protracted process has occurred. For intermediate steps of protracted processes, a separate decision to delay disclosure is no longer required.

In other cases, Marimekko may, under MAR and on its own responsibility, delay the disclosure of inside information provided that all of the following conditions are met:

- immediate disclosure would be likely to prejudice the legitimate interests of the company, for example where a competent authority requires confidentiality on grounds of national security or public health, where additional information relating to the event or circumstances is required, and complete information and/or documentation are not immediately available (e.g. a major accident or a cyber-attack), or where there is a risk of losing a business opportunity in a parallel acquisition process where a competitor could use information disclosed in one process to adjust its offer in another;
- the inside information whose disclosure is intended to be delayed is not inconsistent with the company's latest public announcement or other communication on the same matter. Such inconsistency may arise when inside information concerns a material change in relation to publicly communicated (i) forecasts, financial results or business objectives, (ii) environmental or social impacts of a product or project, (iii) financial viability or financial conditions, (iv) unattained results or deadlines of products or

projects under development, (v) changes in capital structure (e.g. a material change in the issuance of financial instruments), (vi) business strategy (e.g. expansion into a new geographical market), (vii) key contractual or commercial terms, or (viii) governance, including management structures and internal policies; and

- the company is able to ensure the confidentiality of the information.

The company assesses on a case-by-case basis whether the conditions for delaying disclosure are met, as described in more detail in the company's Insider Policy. If all of the conditions above are not met, the company must publicly disclose the inside information as soon as possible by means of a stock exchange release.

## **4 Financial reporting**

### **4.1 Periodic disclosure**

Marimekko regularly discloses information on the company's results, balance sheet and financial position, future outlook and other similar matters and their development primarily in its financial statements bulletin, half-year financial report and interim reports (Q1 and Q3). In addition, Marimekko publicly discloses the financial statements, the report of the Board of Directors and the sustainability report, the auditor's report, the corporate governance statement and the remuneration report.

Financial reports are published in accordance with a previously announced schedule. The publication dates for the next financial year are disclosed on the company's website prior to the beginning of the financial year. The company's financial year is the calendar year.

### **4.2 Future outlook**

If so decided by the Board of Directors, Marimekko publishes an assessment of the company's future outlook and possible financial guidance in the financial statements bulletin. Marimekko also presents an assessment of the key factors and risks affecting the company's future development in the financial statements bulletin, the half-year financial report and the interim reports.

### **4.3 Profit warnings**

#### **4.3.1 Issuing a profit warning**

Marimekko continuously monitors the company's financial result, position and future outlook. A profit warning is disclosed when the company reasonably expects that its future outlook will deviate materially, either positively or negatively, from previously disclosed information and such deviation is likely to have a significant effect on the price of Marimekko's financial instruments. The disclosure of a profit warning cannot be delayed.

#### **4.3.2 Process for issuing a profit warning**

President and CEO shall immediately inform the Chair of the Board when the President and CEO, the Chief Financial Officer, another company officer or a member of the Board identifies a need to consider issuing a profit warning. Primarily, the President and CEO and the Chief

Financial Officer assess the need to issue a profit warning together with the Chair of the Board.

The Board of Directors decides in principle on the issuance of a profit warning. However, the Chair of the Board may, at their discretion, decide on the issuance of a profit warning if it is not possible to convene a Board meeting within the required timeframe. The Chair of the Board keeps the members of the Board informed of the decision making.

## **5 Communication channels and types of releases**

### **5.1 Communication channels**

Marimekko's websites (Finnish: <https://company.marimekko.com/fi/sijoittajat/> and English: <https://company.marimekko.com/investors/>) are the primary channels for distributing up to date investor information. The company aims to provide reliable and comprehensive information enabling investors to form an accurate understanding of the company. The websites contain information, among other things, on the company's strategy, financial targets and operating environment, Marimekko as an investment, corporate governance, General Meetings, and the most important current events concerning the company.

Marimekko's stock exchange releases are published through a professional news distribution service provider, including distribution to Nasdaq Helsinki and key media, and simultaneously on the company's website. Press releases are published to key media and on the company's website. Marimekko's releases may be subscribed to via the company's website. Releases are archived for five years, and financial and other periodic reports for ten years.

Marimekko's official reporting language is Finnish. Stock exchange releases and financial reports subject to disclosure obligations are published both in Finnish and in English.

### **5.2 Releases published by Marimekko**

#### **5.2.1 Stock exchange releases**

In addition to periodic information reporting obligation, a stock exchange release is used to disclose inside information relating to facts, matters and circumstances which Marimekko reasonably believes are likely to have a significant effect on the price of Marimekko's shares and other financial instruments. Stock exchange releases are also used to disclose regulated information that is required to be published via a stock exchange release (such as managers' transactions, notices to general meetings and resolutions thereof), even if such releases do not include price sensitive information as such.

In general, the following events, if significant to Marimekko, are considered by Marimekko to constitute inside information:

- changes in Marimekko's previously disclosed outlook and/or financial result or position;
- changes in long-term financial targets;
- significant investments;
- material acquisitions, mergers, divestments and other corporate transactions involving Marimekko, as well as other material contractual arrangements;
- significant organizational changes;

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- issuances of Marimekko's shares or other financial instruments, public tender offers, share splits or other changes in the number of shares;
- material related-party transactions from the perspective of the Company and its shareholders;
- material litigation and material regulatory proceedings and decisions or judgments therein; and
- reorientation of Marimekko's business operations, restructuring programs or profit-improvement programs.

The disclosure obligation generally guides the assessment and decision-making related to the publication of stock exchange releases. This assessment is carried out simultaneously with the process of assessing whether the conditions for delaying disclosure are met.

In addition to the above, the rules of Nasdaq Helsinki define other matters that must be disclosed by means of stock exchange releases. When assessing the need to publish a stock exchange release, attention is paid to whether similar matters have previously been disclosed through stock exchange releases or whether similar information has previously had a significant effect on the price of a financial instrument.

Marimekko's President and CEO, Chief Financial Officer or General Counsel reviews and approves stock exchange releases prior to publication.

## **5.2.2 Press releases**

The company also publishes press releases on business-related events that do not meet the criteria for stock exchange releases but are considered newsworthy or otherwise of general interest to the media and the company's stakeholders.

In addition, Marimekko publishes, for example, invitations to results presentations and possible capital markets days by means of press releases.

## **5.3 Silent period**

Marimekko observes a silent period of 30 days prior to the publication of financial statements bulletin, half-year financial report and interim reports. During this period, company representatives do not meet with capital market representatives and do not give interviews or comment on the financial position of the Marimekko Group, the markets or the company's outlook. The publication dates of results and silent periods are disclosed in the investor calendar on the company's website.

If an event requires immediate disclosure during a silent period, Marimekko publishes the information without delay in accordance with applicable disclosure regulations and decides on providing interviews on a case-by-case basis, limiting any communication strictly to the relevant matter.

## 6 Practices

### 6.1 Communication with investors and analysts

Marimekko's principle is transparency towards capital market and media representatives and, except during the silent period, the company aims to respond to enquiries from investors, analysts and the media without undue delay.

Financial information is provided to investors, analysts and the media within the scope of previously disclosed information and accurately in accordance with such information. Undisclosed financial information, or additional information that together with previously disclosed information could constitute inside information, is not provided in investor meetings or other communications with investors, analysts or the media.

Marimekko continuously monitors market expectations. Upon request, the company may review analysts' analyses and reports, but only for factual accuracy and publicly available information. Marimekko does not comment on or assume responsibility for estimates or expectations made by capital market representatives. The company does not comment on the valuation of the company or the development of its share price.

### 6.2 Responsible persons and spokespersons

Matters relating to disclosure obligations are handled by the company's President and CEO and Chief Financial Officer together with persons responsible for group communications and investor relations, as well as legal and insider matters.

The company's financial position and published future outlook may be commented on by the President and CEO, Chief Financial Officer and the person responsible for investor relations. The Chair of the Board may give statements if, in exceptional circumstances, the President and CEO or the Chief Financial Officer are unable to comment on the matter. The Chair of the Board primarily represents the Board, and the President and CEO or other executives do not comment on matters within the competence of the Board.

Company representatives designated by the President and CEO on a case-by-case basis may issue public statements on matters other than the financial position and future outlook in specifically agreed situations. For example, members of the Management Group or certain experts, such as the person responsible for sustainability, may comment on matters within their areas of responsibility.

The Chief Financial Officer is responsible for the investor relations function and for compliance related to investor relations and disclosures. The person responsible for investor relations prepares and coordinates all events and presentations directed at shareholders, investors and analysts and is responsible for the preparation of financial reports and stock exchange releases. The person responsible for investor relations also handles enquiries from shareholders, investors and analysts and comments on the company's operations and development when necessary.

The company's Director of Communications is responsible for managing crisis communications. Depending on the situation, the President and CEO may decide to centralize communications with another designated person.

## **6.3 Rumors, market speculation and information leaks**

As a general rule, Marimekko does not comment on market rumors or speculation, share price development, competitors' actions or analysts' assessments unless it is necessary to correct materially incorrect information that is likely to have a significant effect on the price of the company's financial instruments.

If inside information has leaked to the public or confidentiality can no longer be ensured, the company discloses the matter by means of a stock exchange release as soon as possible in accordance with applicable rules and procedures concerning market abuse and the disclosure of inside information.

## **7 Insider Policy**

Marimekko's Insider Policy and insider administration are based on the requirements of MAR, regulations and provisions issued thereunder, the rules and guidelines of the Finnish Financial Supervisory Authority, and the rules and guidelines of Nasdaq Helsinki. The Insider Policy addresses the disclosure of inside information and forms an integral part of this Disclosure Policy.

## **8 Deviations and updates**

Within the framework of applicable laws and regulations, the company may, in individual cases and for compelling reasons, deviate from this Disclosure Policy. Decisions on such deviations are made by the President and CEO.

The Board of Directors decides on any amendments to the Disclosure Policy. The President and CEO may make minor or technical amendments to the Disclosure Policy.