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## DISCLOSURE POLICY

### 1. Purpose and scope of the policy

The Board of Directors of Neste Corporation has approved this Policy to outline the principles the company follows when communicating with capital markets, media, and other stakeholders. The principles of this policy apply to the whole Neste Group. This document replaces previous versions of the Disclosure Policy.

### 2. Disclosure principles

Neste's key disclosure principle is to ensure that all market participants have access to equal, fair and simultaneous information that may have an impact on the value of the company's financial instruments. Neste is committed to proper disclosure of information, whether positive or negative, in an accurate, consistent and transparent manner.

### 3. Responsibilities

Corporate Communications is responsible for maintaining this Policy. The Board of Directors approves all significant amendments, although minor technical updates may be approved by Neste's leadership team. This Policy will be reviewed periodically and updated as necessary.

In individual cases, for weighty reasons and within the limits of applicable laws and regulations, the Chair of the Board of Directors and the President and CEO of the company together may deviate from the Policy.

### 4. Disclosure obligations

Neste complies with applicable EU and Finnish legislation, such as the Finnish Securities Markets Act (746/2012, as amended) and the Market Abuse Regulation ((EU) No 596/2014) (MAR) in all disclosure and communications. Furthermore, Neste complies, as applicable, with the rules of Nasdaq Helsinki and the regulations and guidelines of the European Securities and Markets Authority (ESMA) and the Finnish Financial Supervisory Authority, the Finnish Corporate Governance Code for listed companies maintained by the Finnish Securities Market Association as well as the company's internal rules.

Neste also complies with the Nasdaq Helsinki Guidelines for Insiders, in addition to which the company has prepared its own insider guidelines.

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## 4.1 Regular disclosure

Neste publishes its financial statement releases, annual financial statements and the report of the Board of Directors, half-year reports and interim reports as a stock exchange release in accordance with a pre-announced annual schedule. Before the beginning of each financial year, Neste publishes an event calendar, including the dates of publication of the company's financial reports and the date of the company's Annual General Meeting in a stock exchange release. The calendar is also published on the company's website at [www.neste.com](http://www.neste.com).

In accordance with applicable laws, Neste publishes a Corporate Governance Statement and a Remuneration Report for governing bodies for each financial year. Furthermore, the auditor's report on the annual financial statements is published together with the publication of the annual financial statements and the report of the Board of Directors. Furthermore, the company publishes a statutory sustainability statement as part of the report of the Board of Directors. Other information and materials required by the Finnish Corporate Governance Code are published on Neste's website.

## 4.2 Continuous disclosure

Neste will publish inside information as soon as possible as a stock exchange release, unless the conditions for delayed disclosure are met. The obligation to publicly disclose inside information does not apply to inside information related to intermediate steps in a protracted process. In a protracted process, Neste publishes inside information without delay only in respect of the final circumstances or final event. The obligation to publicly disclose inside information and the procedure for delaying disclosure are discussed in more detail in the company's insider guidelines.

Inside information means information of a precise and undisclosed nature relating directly or indirectly to Neste or one or more company's financial instruments and which, if made public, would be likely to have a significant effect on the prices of the company's financial instruments or the prices of related derivatives.

Neste will issue a profit warning as soon as possible as inside information via a stock exchange release, if it estimates that Neste's profit or financial position or their likely development has changed materially from the information previously disclosed by the company. The profit warning is based on Neste's earlier guidance or what can be reasonably inferred from information previously disclosed by the company. The decision on issuing a profit warning is made by the Board of Directors or the President and CEO together with the Chair of the Board of Directors.

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### 4.3 Managers' transactions, flagging notifications and other disclosure

Neste will publicly disclose transactions in the company's financial instruments by the company's managers and persons closely associated with them as a stock exchange release promptly and no later than two (2) working days after receiving the notification. The definition of a manager is set out in the company's Insider guidelines.

Flagging notifications will be publicly disclosed as a stock exchange release without unnecessary delay.

Neste shall also disclose through stock exchange release other regulated information and information to be disclosed pursuant to the Rules of Nasdaq Helsinki.

## 5. Releases

### 5.1 Stock exchange releases

Information covered by the regular and continuous as well as other disclosure obligations described above is published as a stock exchange release.

Stock exchange releases are distributed simultaneously to the key domestic media via the Neste's release distribution service and to the national central storage of regulated information. All releases are also published simultaneously on the company's website at [www.neste.com](http://www.neste.com). Neste's official reporting language is Finnish. Stock exchange releases, financial reports and all other official material are published in Finnish and in English.

### 5.2 Press releases and news

Neste publishes press releases and news on topics that it considers to be of interest to the media and other stakeholders, but which do not meet the criteria for stock exchange releases.

## 6. Practices and procedures

### 6.1 Spokespersons

The company's financial position and published future outlook may be commented on by the President and CEO, Chief Financial Officer and designated representatives of Neste's Investor Relations (IR) and the Communications functions.

Neste has established a list of personnel authorized to issue statements to the media on behalf of the company on matters that come within their sphere of responsibilities and additional spokespersons may be designated by Neste's leadership team, if needed. Releases issued by Neste provide contact details for Neste's media desk, which aims to

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ensure that the right spokespersons are available to provide further information in a timely manner.

## 6.2 Investor communications and media relations

Neste meets representatives of the financial community and the media on a proactive basis and aims to respond without undue delay to inquiries received from investors, equity analysts, and the media.

Neste's Investor Relations (IR) function coordinates all contacts with investors, shareholders and equity analysts. Investor presentations are available on Neste's website.

Neste's Communications function is responsible for the company's media contacts. Communications personnel coordinate requests for interviews and arrange background meetings for the media.

Discussions with investors, analysts and the media are limited to information that has already been published by the company or is generally available on the market. Neste comments on its own activities and does not comment on those of its competitors, suppliers or customers.

## 6.3 Market rumours and information leaks

Neste does not comment on public rumours or speculations by the media. However, in the event that unfounded market rumours or blatantly inaccurate information may have a material impact on the price of the company's financial instruments, Neste will consider correcting such market rumours or inaccurate information without delay.

If inside information has leaked to the public or confidentiality can no longer be ensured, Neste will publicly disclose the inside information as a stock exchange release as soon as possible.

## 6.4 Analyst forecasts

Neste does not correct analyst forecasts or give comments on the company's valuation or share price development. Neste is not responsible for any valuations made by representatives of the capital markets or comment on these.

If Neste discovers that the conclusions presented by analysts on the value of the company's financial instruments significantly differ from Neste's own estimate, the company will consider whether the information it has provided has been sufficient for making a justified estimate on the company and its financial instruments.

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## 6.5 Future guidance and outlook

Neste may present in its financial statements releases, half-year reports and interim reports a numerical estimate of the development of selected key parameters (guidance). In addition, the company may issue a verbal description of the events and circumstances influencing the guidance (outlook). Given the nature of the company's business, quarterly and annual variations are normal.

## 6.6 Silent period

Regularly released financial reports are preceded by a silent period starting 30 days before the day of the disclosure of the next financial report. During the silent period, results or factors affecting it are not discussed by the representatives of Neste with the representatives of capital markets or media. The silent period ends when the financial statements, interim report or the half-year report is published.

Should an event requiring immediate disclosure (such as a significant business transaction) occur during the silent period, Neste will publicly disclose said information without delay in accordance with applicable disclosure obligations and procedures and may comment on said event after the disclosure.

## 6.7 Crisis communications

The President and CEO, together with the senior management member responsible for communications, leads Neste's crisis communications. The objective of Neste's crisis communications is to share information in a coordinated, timely, clear and transparent way.

## 6.8 Website

Neste's website ([www.neste.com](http://www.neste.com)) is the company's principal channel of communications for different stakeholders.

Neste keeps the stock exchange releases it has published on its website for at least five (5) years. The company keeps the financial reports, corporate governance statements, statutory sustainability statements and remuneration reports published under the regular disclosure obligation on its website for at least ten (10) years.