

A group of five people (three women and two men) are walking on a paved path in front of a modern glass-walled building. The building has the word "INNOFACTOR" mounted on its facade in large, silver, 3D letters. The people are dressed in winter attire, including jackets and scarves. The background shows trees and a clear sky.

INNOFACTOR

INNOFACTOR

Sustainability Report  
2024

# Innofactor Plc's Sustainability Report 2024

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## Changes in Reporting

Innofactor publishes its first Sustainability Report in accordance with the Corporate Sustainability Reporting Directive and chapter 7 of the Finnish Accounting Act with regard to information on the year 2024. Where applicable, the report also includes comparison data for 2023. The metrics used in the report have not been subject to verification other than the assurance required by the Accounting Act.

## Sustainability at Innofactor

### Innofactor's Double Materiality Assessment and Information to be Reported

Innofactor has assessed the most significant sustainability themes for its operations in accordance with the principle of double materiality. Innofactor's first double materiality assessment was mainly carried out in 2023, and it consisted of stakeholder identification, an extensive stakeholder survey with approximately 120 responses, a survey for the Executive Board, an Executive Board workshop and the continuous work of the sustainability steering group. The Executive Board workshop discussed the results of the surveys mentioned and various sustainability themes in the context of Innofactor's operations. External sustainability specialists have been partially used to support the work on the assessment.

Based on the double materiality assessment and the sustainability strategy approved by the Board of Directors, Innofactor includes the following standards in its reporting:

- ESRS 2 General disclosures
- ESRS E1 Climate change
- ESRS S1 Own workforce
- ESRS S2 Workers in the value chain (Innofactor applies the transitional provision, not included in the reporting on 2024)
- G1 Business conduct

In addition to the ESRS standards, Innofactor has identified the significance of data security and data protection as part of sustainable business development in the IT sector.

Innofactor's sustainability efforts are guided by the approved strategies concerning the company's business operations and sustainability, as well as the ISO 9001, ISO 27001, ISO 13485 and AQAP-2110 standards and related processes and guidelines. Innofactor is also committed to complying with the ILO Declaration on Fundamental Principles and Rights at Work, UN Universal Declaration of Human Rights, UN Sustainable Development Goals, and the principles of the ICC Business Charter for Sustainable Development.

Innofactor is committed to supporting the achievement of the UN Sustainable Development Goals (SDGs) by 2030. We have identified the most relevant SDGs from the perspective of our business operations: SDG 8 Decent work and economic growth, SDG 5 Gender equality, and SDG 3 Good health and well-being. The standards taken into account in this Sustainability Report are aligned with these goals.

### Innofactor's Sustainability Strategy

Our sustainability vision is: We promote sustainable innovation, equality, well-being and integrity to build a better future.

Our sustainability strategy is divided into four areas:

- We innovate for good
- We are fair
- We put people first
- We build trust

The areas and objectives of the strategy are based on the results of our stakeholder survey and internal workshops, and approved by the Board of Directors. The sustainability strategy is aligned with Innofactor's strategy, mission, values, employee value proposition and working principles.

## ESRS 2 – General Disclosures

### BP-1 General Basis for Preparation of Sustainability Statements

Innofactor's sustainability report consists of the entities included in Innofactor PLC's consolidated financial statements. The scope of consolidation of the report is the same as for the company's financial statements.

With regard to the value chain, the report includes information on Innofactor's own personnel and operations. From the value chain, suppliers of IT equipment and cloud capacity have been included in emissions calculations. In other respects, the value chain participants have not been considered material, with the preliminary exception of value chain workers, with regard to whom Innofactor applies the transitional provision as described below. The value chain is described in more detail below in the paragraph *SBM-1 Strategy, Business Model and Value Chain*.

In this report, Innofactor has not used the option to omit information corresponding to intellectual property, know-how, the results of innovation, impending negotiations or matters in the course of negotiation.

### BP-2 Disclosures in Relation to Specific Circumstances

Innofactor applies the definitions of short-, medium- and long-term time horizons provided in the ESRS standards. Innofactor has partially used indirect sources in its GHG emissions calculations. GHG emissions calculation is described in paragraph *E1-6 Gross Scopes 1, 2, 3 and Total GHG Emissions*. In other respects, the reported information has been obtained directly from the systems concerning the data in question.

Innofactor is publishing its Sustainability Report for 2024 for the first time with this scope, so the report is not directly comparable with the previously reported data in all respects. In the future, potential changes from previous reporting periods will be described in the report in accordance with the requirements of the ESRS standards (such as comparative figures, their differences and potential errors). Innofactor has not identified any errors in the information reported on the year 2023.

According to Innofactor's assessment, the reported quantitative metrics do not involve significant uncertainty.

### Use of Transitional Provisions

Innofactor applies a transitional provision in the disclosure of information required by the standard ESRS S2 Workers in the value chain, which has been assessed as material on a preliminary basis. In addition, according to transitional provisions, Innofactor's reporting on 2024 does not include Disclosure Requirement E1-9 "Anticipated financial effects from material physical and transition risks and potential climate-related opportunities" under the E1 Climate change standard.

Taking into account the sizes of Innofactor, its customers, partners and subcontractors as well as their geographical scope of operation, Innofactor has, at this stage, assessed working conditions and equal treatment as relevant sub-topics with regard to value chain workers. The practices applied so far in relation to Innofactor's partners and subcontractors to take into account potential negative impacts in the value chain are described below in the paragraph *G1-2 Management Of Relationships With Suppliers*. Innofactor does not apply separate metrics with regard to value chain workers, and has yet to set targets concerning value chain workers. Reporting, targets, metrics and methods of influence concerning value chain workers will be assessed in more detail during the transition period.

### GOV-1 The Role of the Administrative, Management and Supervisory Bodies

Innofactor's key bodies with regard to sustainable development consist of the Board of Directors, the Group Executive Board, the sustainability steering group and the sustainability committee. Innofactor also uses external sustainability consultants when necessary. Innofactor's corporate governance system is also described in a separate Corporate Governance Statement. In addition to the bodies described below, the bodies that play a key role with regard to sustainable development also include Innofactor's centralized HR function and the data security group, which are represented in the sustainability steering group.

Innofactor's sustainability management model is presented in the figure below.



## Sustainability Management at Innofactor

### Body

<p><b>Board of Directors</b></p>	<p><b>Members:</b> In 2024, the Board of Directors consisted of Anna Lindén (chair), Sami Ensio, Risto Linturi, and Heikki Nikku until October 11, 2024. From October 11, 2024, onwards, the Board of Directors has consisted of Antti Kummum (chair), Sami Ensio, Timo Larjomaa and Risto Linturi.</p> <p>The Board of Directors confirms the setting of targets annually and monitors their progress at its meetings. Of the members of the Board of Directors, CEO Sami Ensio participates in the company's management as an executive.</p> <p><b>Gender diversity:</b> Until October 11, 2024, the gender distribution of the Board of Directors was 25% women and 75% men. From October 11, 2024, onwards, there have been no female members on the Board of Directors.</p> <p><b>Responsibilities:</b> The Board of Directors has overall responsibility for sustainability reporting and resource allocation. The Board of Directors approves the sustainability strategy and the company's risk management principles.</p> <p><b>Independence:</b> Until October 11, 2024, 75% of the members of the Board of Directors were independent of the company and its significant shareholders. During the period October 11–December 31, 2024, the proportion of Board members who were independent of the company and its significant shareholders was 50%.</p>
<p><b>Group Executive Board</b></p> <p>(CEO and CFO as part of the Executive Board)</p>	<p><b>Members:</b> The Group Executive Board consists of Sami Ensio (CEO), Jørn Ellefsen (Country Manager, Norway and Denmark), Martin Söderlind (Country Manager, Sweden), Anni Wahlroos (CPO and Deputy CEO) and Janne Heikkinen (EVP, Products &amp; Services).</p> <p>During 2024, the members of the Group Executive Board also included Antti Rokala (CFO) from January 1 to October 29, 2024, and Vesa Syrjäkäri (Executive Vice President, Business Development and Operational Excellence) from January 1 to September 30, 2024.</p> <p>There were no employee representatives on the Executive Board. All members of the Executive Board have participated in the company's management as executives.</p> <p><b>Gender diversity:</b> Until October 31, 2024, the gender distribution of the Executive Board was 14% women and 86% men. During the period November 1–December 31, 2024, the proportion of women on the Executive Board was 20%.</p> <p><b>Responsibilities:</b></p> <ul style="list-style-type: none"> <li>• Assesses the template and data points of the sustainability report and presents the report to the Board of Directors for approval.</li> <li>• Determines the resources available for sustainable development.</li> <li>• Reviews the sustainability strategy and presents it to the Board of Directors for approval.</li> <li>• Prepares annual sustainability targets and presents them to the Board of Directors for approval as part of the company's business targets. The Executive Board monitors progress towards the targets.</li> <li>• The CFO is responsible for annual sustainability reporting.</li> <li>• Ensures competence development related to sustainability matters.</li> </ul>

<p><b>Sustainability steering group</b></p> <p>Consists of representatives of Innofactor's functions that are material with respect to the sustainability themes, and process owners.</p>	<p><b>Members:</b> In 2024, the sustainability steering group comprised seven members, representing the following support functions: HR, Communications, Legal and Finance. There were five employees in the steering group and two executive members of the Group's management.</p> <p><b>Gender diversity:</b> In 2024, 57% of the members were women and 43% were men.</p> <p><b>Responsibilities:</b></p> <ul style="list-style-type: none"> <li>• Continuous assessment of impacts, risks and opportunities, as well as materiality, with regard to sustainability themes.</li> <li>• Regular engagement with stakeholders.</li> <li>• Each representative is in charge of the planning and implementation of sustainability-related measures and targets in their area of responsibility.</li> <li>• The sustainability steering group prepares and, if necessary, presents sustainability targets to the Executive Board.</li> </ul>
<p><b>Sustainability committee</b></p>	<ul style="list-style-type: none"> <li>• A voluntary committee consisting of Innofactor employees.</li> <li>• Implements actions related to sustainability targets and makes proposals for actions.</li> <li>• In 2024, Innofactor's resource allocation was focused on the preparation of reporting, and the committee did not meet at all. The plan is to restart the committee's operations in 2025.</li> </ul>

In 2024, the Board of Directors included members who have familiarized themselves with sustainability matters that are relevant to Innofactor's business and operating environment. The members of the Board of Directors do not represent specific expertise or educational backgrounds related to sustainability. In its work, the Board of Directors utilizes the expertise of the Executive Board and the sustainability steering group, as well as external experts if necessary. The Board of Directors has broad expertise in, and understanding of, the IT business, the impacts of the technology transformation and taking them into account in business operations, and IT industry trends in the company's business areas in the Nordic countries.

The members of Innofactor's Executive Board represent all of the company's business areas. The Executive Board has members from Finland, Sweden and Norway. The Chief People Officer, who is part of the Executive Board, has strong expertise in sustainability matters concerning social responsibility and, in particular, the Group's own workforce.

The sustainability expertise of the sustainability steering group and the rest of the organization in relation to material impacts, risks and opportunities is available to the company's Board of Directors and the Executive Board. The members of the sustainability steering group have been selected on the basis of the identified material sustainability themes, in which each member has a relevant educational background and experience in their area of responsibility.

## **GOV-2 Information Provided to and Sustainability Matters Addressed by the Undertaking's Administrative, Management and Supervisory Bodies**

The sustainability steering group regularly assesses the impacts, risks and opportunities related to sustainability matters in accordance with Innofactor's internal risk management principles, among other things. In accordance with the company's risk management process, Innofactor's Group management prepares a quarterly risk assessment for the company's Board of Directors and Executive Board, which included the following sustainability-related risks in 2023 and 2024:

- The availability of competent personnel
- Personnel turnover
- Risks related to data protection and data security
- Risks related to legal compliance (such as risks caused by corruption and anti-competitive behavior) and the resulting potential risk of exclusion from public procurement processes.

The risk assessment includes the status of each identified risk and a summary of the planned remedies if the threshold set for the risk has been exceeded. The Board of Directors uses the information provided by the risk assessment as a basis for decision-making.

During the reporting period, the Board of Directors approved Innofactor's sustainability strategy and, as part of the preparations for reporting, the sustainability steering group has addressed the matters described in paragraph *SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model* on an ongoing basis. In addition, as part of its normal work, the Board of Directors has been informed of figures related to employee satisfaction and the status of data security and data protection, among other matters. During the reporting period, the Executive Board indirectly addressed sustainability themes as part of Innofactor's strategy reform.

Risks are described in more detail in paragraph *SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model*, and the responsibilities of the governance bodies are described above in paragraph *GOV-1 The Role of the Administrative, Management and Supervisory Bodies*.

## **GOV-3 Integration of Sustainability-Related Performance in Incentive Schemes**

At Innofactor, all employees are covered by an incentive scheme. The incentive scheme is approved annually by the company's Board of Directors on the basis of the proposals of the Remuneration Committee. The key elements of the incentive scheme common to all of the participants are growth and profitability. For customer-facing experts, the amount of customer work is also a factor.

For the management, sustainability-related performance is linked to the bonus scheme through customer satisfaction and employee satisfaction. If employee satisfaction or customer satisfaction decreases when compared to the preceding performance period or is below the target, it has a decreasing effect of 10 percent on the management's incentives for both variables. The management's incentives do not include climate-related targets, and they have not been considered relevant so far due to the nature of the company's operations.

## **GOV-4 Statement on Due Diligence**

Innofactor's operations are managed through pre-defined core processes and standards. Innofactor's quality system defines the company's business model and is divided into eight documented business processes and eight support service processes. The company's support service processes relating to risk management, legal issues and financial reporting, and business processes related to the personnel and resource allocation, define the main issues and procedures with regard to sustainability.

Innofactor does not have a separate due diligence process concerning sustainability. Instead, sustainability is taken into account in accordance with the established strategic priorities in each process that is relevant to a sustainability theme (e.g. personnel well-being in the HR process). Compliance with processes and their implementation is monitored through process metrics and internal audits, and each process has a designated owner.

### **GOV-5 Risk Management and Internal Controls over Sustainability Reporting**

A general description of Innofactor's risk management is provided in paragraph *IRO-1 Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities*, and the same procedure also applies to risks related to sustainability reporting. Sustainability reporting is part of each applicable process (such as HR), and the reporting process can be audited internally as part of Innofactor's quality system audits. The report is audited annually in connection with the external verification of sustainability reporting.

Risks related to sustainability reporting are monitored as part of the company's ordinary monitoring in accordance with the risk management process. With regard to risks related to sustainability reporting, the sustainability steering group has identified personnel turnover concerning persons responsible for reporting and resource allocation as key short-term and medium-term risks, and access to reliable information on the value chain has been identified as a risk when the transition period ends. However, these risks have not been considered material for the time being.

### **SBM-1 Strategy, Business Model and Value Chain**

Innofactor worked on updating its business strategy during the reporting period. Operations under the new strategy and organizational structure started on January 1, 2025. From the perspective of sustainability reporting and the double materiality assessment carried out by the company, the new

strategy did not include any changes that would have significant impacts on Innofactor's business model, value chain, material sustainability themes or information to be reported.

The most significant product and service categories during the reporting period were:

- Digital Services
- Business Solutions
- Information and Case Management
- Cloud Infrastructure
- Data, Analytics and AI
- Cybersecurity

Innofactor's customer base consists of private, public and third-sector operators, and Innofactor's solutions are utilized by approximately 1,000 private and public sector organizations in the Nordic countries. In 2024, companies represented 51% of the customer base and the public administration (including the third sector) represented 49%. Innofactor does not disaggregate its net sales by industry, but has assessed that the key ESRS sectors for its operations are technology and telecommunications, industry and manufacturing, and health and well-being.

The number of employees in each operating country is reported in paragraph *S1-6 Characteristics of the Undertaking's Employees*.

As described below in paragraph *SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model*, Innofactor has identified an opportunity to have an impact on sustainability-related topics through its products and services, together with customers. However, Innofactor has not yet defined targets or metrics concerning these.

Innofactor's strategy during the reporting period and the company's new strategy focus on solutions that are implemented on, and take advantage of, Microsoft platforms. Innofactor focuses on implementing cloud solutions and

digitalization as well as AI-driven solutions. Innofactor is a system integrator and software development company. Thus, the core of the business model and enabler of the company's growth is the competent personnel with the ability to advance.

Innofactor offers its customers planning services for business-critical IT solutions, project deliveries, implementation support and maintenance services, and develops its own software and services. With regard to

Innofactor's business model, the key participants in the company's value chain consist of Innofactor's own personnel, technology partners, IT hardware suppliers and the end-users of Innofactor's solutions, including customers, customers' employees, customers' customers, and other stakeholders.

Innofactor's key production input is Innofactor's own personnel and, where necessary, subcontracting chains. Policies related to Innofactor's own personnel are described below in the report's section *ESRS S1 – Own Workforce*.

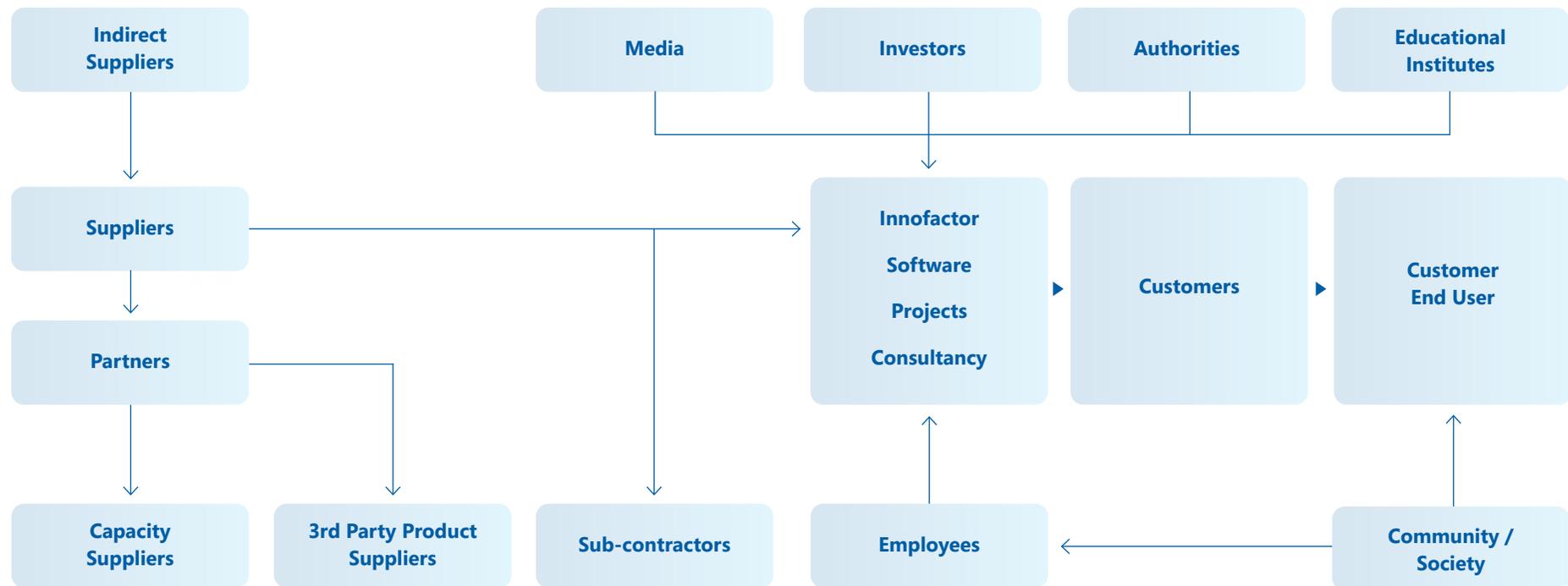


Image: Innofactor's value chain

## SBM-2 Interests and Views of Stakeholders

Key stakeholders	Reasoning	Engagement
Customers	Innofactor's success is linked to its customers' success, which is why we aim to help our customers further develop their business.	As part of maintaining the customer relationship, for example, in the form of steering groups and follow-up meetings. A regular customer satisfaction survey.
Personnel	Innofactor's success depends to a significant degree on the company's personnel, their commitment and their competence, as well as their performance in their duties.	Described below in paragraph <i>S1-2 Processes for Engaging with Own Workers and Workers' Representatives About Impacts</i> .
Partners and subcontractors	The availability of partners and subcontractors and the success of co-operation have an impact on Innofactor's performance in helping its customers succeed.	As part of the normal maintenance of partner and subcontracting relationships, depending on the nature of the delivery.
Investors and analysts	Investors and analysts have a direct impact on the company's value and a view of the financial risks and opportunities in Innofactor's operations.	Through the regular provision of investor information, Innofactor aims to keep investors and analysts informed of the development of the company's operations.

In connection with the double materiality assessment, Innofactor has also identified other stakeholders relevant to its operations, such as the public authorities, local communities, educational institutions, researchers, and the media.

The key stakeholders participated in the 2023 stakeholder survey, the results of which were taken into account in the identification of material sustainability themes and defining the priorities of Innofactor’s sustainability strategy. Innofactor’s sustainability steering group continuously assesses who the company considers to be its key stakeholders, taking into account the nature of the business and the material sustainability themes, and the need to commission new stakeholder surveys.

In addition, the key stakeholders’ views concerning sustainability themes are monitored as part of the ordinary course of business (for example, with the help of feedback received from customers or the personnel), and this feedback is also taken into account in the planning of the company’s strategy and business operations. Innofactor also monitors potential assessments of the company presented by analysts. The new business strategy and organizational structure, which entered into effect on January 1, 2025, are expected to serve

Innofactor’s customers and personnel even better. The strategy reform is not expected to materially change relations with stakeholders or the views of stakeholders.

In 2025, Innofactor will assess the need for a regular stakeholder survey and its interval. Feedback from stakeholders is also communicated to the Group’s management and Board of Directors as part of the normal work of the Executive Board and the Board of Directors, and normal business development processes.

**SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model**

Innofactor has described its material impacts, risks and opportunities in the table below. For each theme, the management measures related to the impacts, risks and opportunities are described in connection with each reported standard.

Sustainability theme	Negative impacts	Positive impacts	Risks	Opportunities
<p><b>Environment and climate change</b></p> <p>Estimated time horizon of the impacts: medium-term and long-term.</p>	<p>GHG emissions caused by Innofactor’s own operations and supply chain that warm the climate. Climate change mitigation measures may cause additional costs, but Innofactor has not yet estimated their magnitude in more detail.</p>	<p>The opportunity to support the achievement of customers’ GHG emission reduction targets and to promote digitalization through solutions and services implemented by Innofactor.</p>	<p>Through Innofactor’s value chain, climate change may have an impact on the availability of IT equipment and the price of purchased services if the partners’ adaptation measures related to climate change mitigation lead to increasing costs (transition risk).</p>	<p>Innofactor has the opportunity to have a positive impact on the environment, for example, by promoting the use of digital and energy-efficient solutions with its customers and by favoring partnerships that support sustainability targets in its own operations.</p> <p>Digital solutions related to sustainability themes (such as sustainability data management) can create new business opportunities for Innofactor.</p>

Sustainability theme	Negative impacts	Positive impacts	Risks	Opportunities
<p><b>Own employees</b></p> <p>Covers the company's entire own workforce.</p> <p>Estimated time horizon of impacts: short-term and medium-term.</p>	<p>Employees with a high level of competence and well-being are at the core of Innofactor's business model. However, Innofactor's operations may have negative impacts with regard to the following personnel-related themes in particular:</p> <ul style="list-style-type: none"> <li>• Workload and work-life balance.</li> <li>• Equality and fair treatment of employees</li> <li>• Working conditions and terms of employment in general, such as adequate wages and the management of work.</li> </ul> <p>Challenges related to the aforementioned factors or the way employees perceive Innofactor's operations as an employer have a direct impact on the success of Innofactor's business and strategy.</p>	<p>In its own operations, Innofactor can contribute to the following positive impacts, among others:</p> <ul style="list-style-type: none"> <li>• competence through training, for example.</li> <li>• equality in recruitment and internal decision-making,</li> <li>• well-being at work by monitoring working times and providing meaningful work tasks.</li> </ul>	<p>The availability of highly competent professionals and employee turnover.</p>	<p>Increasing the number of personnel enables financial growth. Net sales growth and developing the competence of the personnel enables the expansion of the customer base, long-term customer relationships and ensuring the quality of deliveries.</p> <p>A responsible employer image supports successful recruitment, makes Innofactor attractive to IT professionals and enables the growth of the number of personnel. Ensuring equal treatment promotes the recruitment of the best talent.</p>
<p><b>Workers in the value chain</b></p> <p>For example, subcontractors' employees.</p>	<p>Indirectly, through business relationships, Innofactor has a similar impact on value chain workers as it has on its own employees.</p> <p>The impacts of operations on working conditions and the realization of human rights are emphasized in the value chain.</p>	<p>The opportunity to contribute to similar positive impacts as for the company's own personnel.</p>	<p>Risks related to working conditions, such as compliance with labor legislation and human rights among subcontracting partners, and potential reputational damage arising from these risks.</p> <p>The materiality of risks is significantly influenced by the nature and geographical scope of the value chain participant's operations.</p>	<p>Partners and customers may increasingly apply sustainability themes in their selection criteria or incorporate sustainability requirements into operations.</p> <p>Ensuring the sustainability of partners may also become a competitive advantage.</p>

Sustainability theme	Negative impacts	Positive impacts	Risks	Opportunities
<p><b>Business conduct (compliance)</b></p> <p>Estimated time horizon of the impacts: medium-term and long-term.</p>	<p>Transparent business in accordance with high ethical standards is the basis of Innofactor's operations.</p> <p>Innofactor's business conduct practices have an impact on Innofactor's ability to promote an open culture and prevent bribery, corruption and other misconduct.</p> <p>If Innofactor did not promote an open corporate culture, it could also lead to an atmosphere for employees in which suspected misconduct would not be reported. Potential incidents of bribery or competition law violations may also cause harm to Innofactor's business, customers and society in a broader sense.</p>	<p>Innofactor can contribute to legal compliance and the realization of its values in its own operations and in its value chain through business relationships.</p> <p>Appropriate practices, prompt investigation of reported incidents and promoting an ethical and sustainable corporate culture can be considered to have a positive impact on procurement processes and also make the company a more attractive supplier for private sector customers.</p>	<p>Innofactor's material risks related to business conduct mainly concern the consequences and reputational damage arising from legal non-compliance. Responding to increasing regulatory requirements also constitutes a financial risk insofar as the resulting costs increase faster than Innofactor's ability to incorporate the costs into its service pricing.</p> <p>A large part of Innofactor's customer base is made up of public procurement entities, which means that unethical conduct (such as violations of competition regulations) may lead to exclusion from procurement processes.</p>	<p>The reliability of operations and adherence to high ethical standards can make Innofactor a more attractive investment, employer and partner for customers.</p> <p>Digital solutions for incident reporting, for example, and the growing number of companies using high-quality management systems may present business opportunities.</p>
<p><b>Data Security and Data Protection</b></p>	<p>Depending on the nature of the delivery, Innofactor has a material impact on how data security and personal data protection are ensured in the solutions and services implemented by the company.</p> <p>Problems related to data security and data protection may lead to significant negative impacts in both Innofactor's own operations and among customers, and also in relation to Innofactor's own personnel.</p>	<p>Through its own actions, Innofactor can promote the realization of data security and data protection in its solutions. Managing these themes and demonstrating this to the customers increases trust and promotes the protection of customers' confidential data, Innofactor's confidential data and personal data, and reduces risks related to data security breaches.</p>	<p>The risks identified by Innofactor in relation to data security and data protection include unauthorized access that compromises data, leaks of insider information or Innofactor's business secrets, compromised personal data, unauthorized transfers of funds, or large-scale denial of service or ransomware attacks.</p> <p>The materialization of the risks may lead to loss of net sales, reputational damage, claims for damages and sanctions imposed by the supervisory authorities.</p>	<p>The increased importance of data security and data protection in society enables the provision of related digital solutions and may lead to an increase in the demand for data security services.</p>

With the exception of data security and data protection, the material impacts, risks and opportunities identified by Innofactor are within the scope of the disclosure requirements stipulated by the ESRS standards. Data security and data protection are discussed in the section *Data Security and Data Protection* of the report.

In the assessment of risks and opportunities, the time horizon applied to impacts is equal to the company's financial year. With regard to the environment, the time horizon of risks can be considered medium-term or long-term. The company has not conducted a climate resilience analysis on its strategy and business model.

During the reporting period 2024, Innofactor did not identify any material financial effects that would result from the materialization of identified risks or material opportunities. Innofactor regularly assesses the value of certain significant assets through separate impairment tests. The potential financial effects arising from impairment can be managed by the Group's internal arrangements.

Material risks, opportunities and impacts are reported in accordance with sustainability reporting regulations for the first time on the year 2024. However, risks, in particular, have also been assessed in previous reporting periods. The company's risk analysis takes into account the company's resilience and ability to address material impacts and risks by setting reference values for the identified risk factors. If these values are exceeded, the management is obliged to determine the appropriate remedies. These materialized risks and the related measures are presented to and addressed by the company's Board of Directors in accordance with Innofactor's risk management process.

### **IRO-1 Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities**

Innofactor's sustainability steering group assesses, at least once per reporting year, the material sustainability-related impacts, risks and opportunities of the company's operations in relation to the sustainability themes in the following respects, for example:

- whether new risks, opportunities or impacts have been identified
- whether there is reason to propose new sustainability-related risks to be added to the risk register, or whether business development opportunities can be identified based on the identified risks
- assess the risks and opportunities arising from the (actual and potential) impacts of operations
- whether there is a need to commission a new stakeholder survey
- whether there is a need to consult an external expert to verify the assessments made.

An analysis of the resilience of the strategy and business model in relation to climate change is conducted as part of the assessment as necessary if any material risks related to climate change have been identified. This process also monitors the climate impacts of Innofactor's operations, such as GHG emissions, and ensures that the science-based emission reduction targets set for Innofactor's operations in 2025 are aligned with the goal of limiting global warming to 1.5°C. No physical climate-related risks were identified in 2024. Climate-related transition risks are addressed in paragraph *SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model*. A scenario analysis has not been used in assessing risks related to climate change.

Innofactor operates in the IT sector, and its locations are offices. Although climate change themes emerged in Innofactor's double materiality assessment, Innofactor has not considered environmental topics such as pollution, water and marine resources, resource use, circular economy, or biodiversity and ecosystems as material. Consequently, Innofactor has not assessed the locations of its offices, business operations, assets, or value chain in terms of risks, opportunities, and dependencies related to these topics. Innofactor has not considered it necessary to implement measures related to biodiversity or to organize separate consultations. Innofactor continuously monitors these topics as part of the sustainability themes evaluation described in this report and updates this assessment and its materiality analysis as necessary.

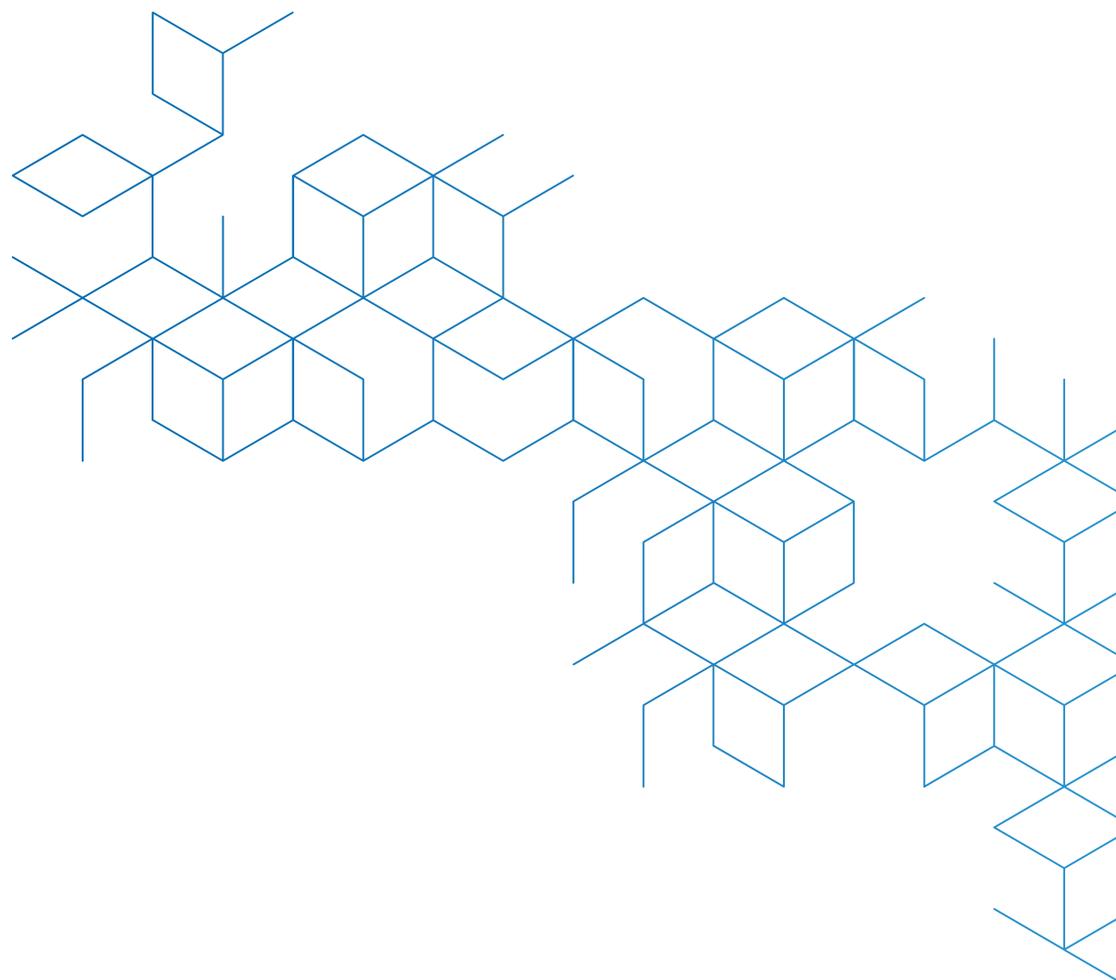
Innofactor applies a risk management process that is within the scope of ISO9001, ISO27001, AQAP2110 and ISO13485 certification and covers all of Innofactor's functions, and is not focused on specific functions, business relationships or geographical areas. The process takes into account the impacts the company is connected with through its own operations or business relationships. Feedback from stakeholders is also used as a basis for assessments.

For each risk or opportunity identified in accordance with the risk registers prepared for the core process of Innofactor's operations, Innofactor defines the category, likelihood, financial effect, owner, risk management measures or measures to realize opportunities. Risks may be prioritized according to their potential impacts. Innofactor does not prioritize sustainability-related risks. Instead, the same risk management processes is applied to all risks. In addition, as part of its double materiality assessment, Innofactor has assessed the likelihood, scope and nature of various impacts related to the sustainability themes at a general level.

Innofactor regularly reviews its Group-level risk register and the need to update it, taking into account the risks related to business operations and risks that may be caused by Innofactor's own operations. The materialization of risks is assessed, among other things, by means of internal audits that are part of the company's management system and the results of which can be utilized in risk assessments. The company's Board of Directors uses the risk assessment as part of its decision-making. The risk assessment process has not been changed from the previous reporting period. Risks, opportunities and impacts can also be identified as part of Innofactor's business development processes.

## **IRO-2 Disclosure Requirements in ESRS Covered by the Undertaking's Sustainability Statement**

A list of reported disclosure requirements is included in the table of contents of this sustainability report, and a list of data points based on other EU legislation is available below in section *IRO-2 List of Datapoints Based on Other EU Legislation*.



## ESRS E1 – Climate Change

Of the disclosure requirements under the E1 standard, disclosure requirement E1-8 Internal carbon pricing has been assessed to be non-material on the basis of Innofactor’s double materiality assessment and business context, as Innofactor does not apply internal carbon pricing schemes.

### EU Taxonomy Disclosures

Innofactor has reviewed its economic activities during the reporting period against the criteria set by the EU. Innofactor has not identified activities aligned with the environmental objectives of the taxonomy. Therefore, Innofactor’s taxonomy-eligible activities account for 0 percent of the company’s net sales and capital expenses.

### Share of taxonomy-eligible activities

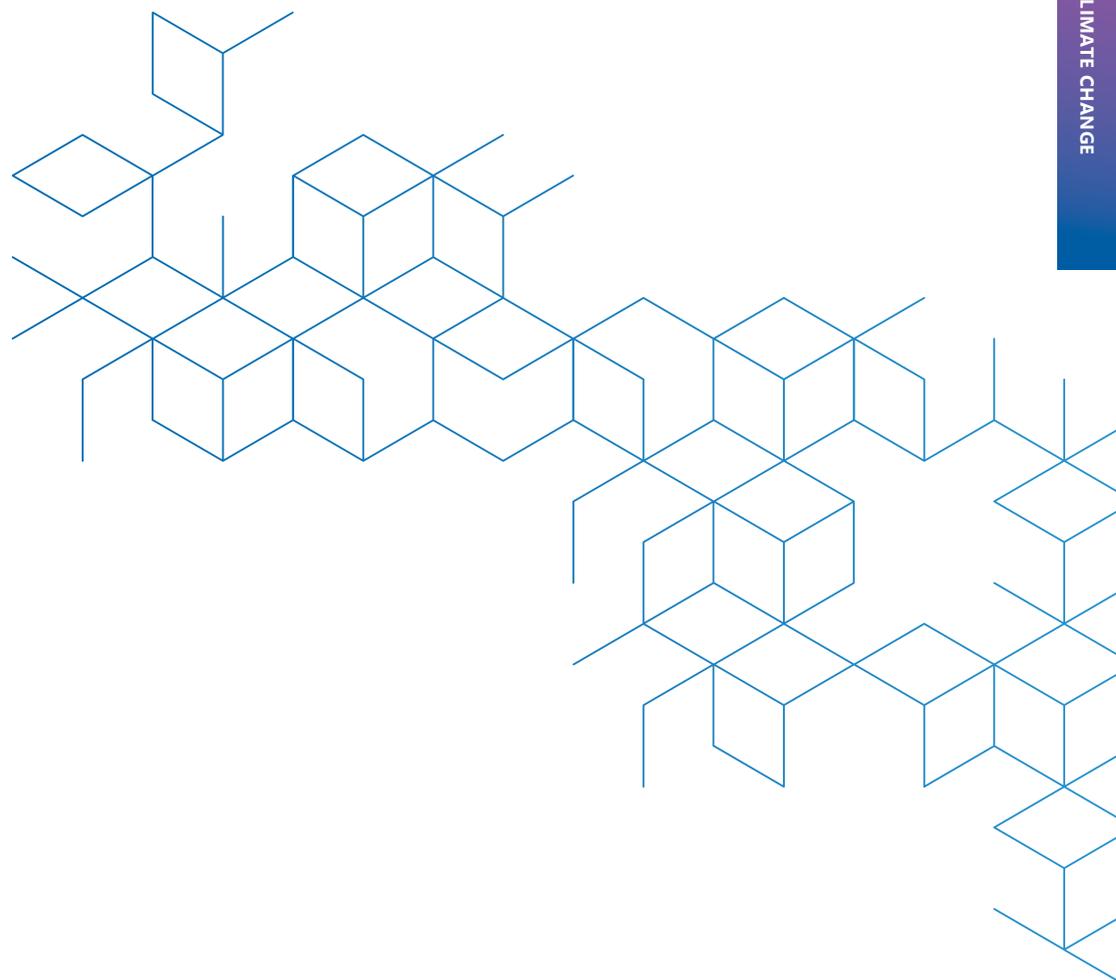
KPI	EUR thousand	Taxonomy-eligible, %	Non-taxonomy-eligible, %
Net sales	77,576	0.0	100.0
Capital expenditure*	472	0.0	100.0
Operating expenditure	8,706	0.0	100.0

\* The Group’s reported gross capital expenses including related advance payments.

Detailed information in accordance with the Taxonomy Regulation is presented in the tables *Taxonomy-Eligible Net Sales*, *Operating Expenses (OpEx)*, and *Capital Expenses (CapEx)*.

### E1-1 Transition Plan for Climate Change Mitigation

Innofactor has started to work on its transition plan for climate change mitigation, and the aim is to report on the transition plan in the sustainability report concerning information on the year 2025.



## Taxonomy-Eligible Net Sales

	Code (2)	Net Sales (3) MEUR	Proportion of Net Sales (4) %	Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Proportion of Taxonomy-aligned (A.1) or -eligible (A.2) net sales, 2024 (18) %	Proportion of Taxonomy-aligned (A.1) or -eligible (A.2) net sales, 2023 (19) %	Category enabling activity (20) M	Category transitional activity (21) S	
				Climate Change Mitigation (5) %	Climate change adaptation (6) %	Water (7) %	Pollution (8) %	Circular Economy (9) %	Biodiversity (10) %	Climate Change Mitigation (11) Y/N	Climate Change Adaptation (12) Y/N	Water (13) Y/N	Pollution (14) Y/N	Circular Economy (15) Y/N	Biodiversity (16) Y/N					Minimum Safeguards (17) Y/N
<b>Economic activities (1)</b>																				
<b>A. Taxonomy-eligible activities</b>																				
Net sales of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	0 %	0 %	n.a.	n.a.
Net sales of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%																	
<b>Net sales of Taxonomy-eligible activities (A.1 + A.2)</b>		<b>0</b>	<b>0%</b>																	
<b>B. Taxonomy-non-eligible activities</b>																				
<b>Net sales of Taxonomy-non-eligible activities (B)</b>		<b>77.6</b>	<b>100%</b>																	
<b>Total (A + B)</b>		<b>77.6</b>	<b>100%</b>																	

## Operating Expenses (OpEx)

	Code (2)	OpEx (3) MEUR	Proportion of OpEx (4) %	Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Minimum Safeguards (17) Y/N	Proportion of Taxonomy-aligned (A.1) or -eligible (A.2) OpEx, 2024 (18) %	Proportion of Taxonomy-aligned (A.1) or -eligible (A.2) OpEx, 2023 (19) %	Category enabling activity (20) M	Category transitional activity (21) S
				Climate Change Mitigation (5) %	Climate change adaptation (6) %	Water (7) %	Pollution (8) %	Circular Economy (9) %	Biodiversity (10) %	Climate Change Mitigation (11) Y/N	Climate Change Adaptation (12) Y/N	Water (13) Y/N	Pollution (14) Y/N	Circular Economy (15) Y/N	Biodiversity (16) Y/N					
<b>Economic activities (1)</b>																				
<b>A. Taxonomy-eligible activities</b>																				
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%																	
<b>OpEx of Taxonomy-eligible activities (A.1 + A.2)</b>		<b>0</b>	<b>0%</b>																	
<b>B. Taxonomy-non-eligible activities</b>																				
<b>OpEx of Taxonomy-non-eligible activities (B)</b>		<b>2.4</b>	<b>100%</b>																	
<b>Total (A + B)</b>		<b>2.4</b>	<b>100%</b>																	

Operating expenses included in the taxonomy assessment (2.4 million euros) cover direct non-capitalized costs related to research and development, building renovation measures, short-term lease, maintenance and repair, and all other direct expenses related to the maintenance of tangible fixed assets either performed by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets (2021/2178).

Innofactor's assessment includes operating expenses related to rental premises, maintenance of premises, and the operation of other fixed assets.

## Capital Expenses (CapEx)

	Code (2)	CapEx (3) MEUR	Proportion of CapEx (4) %	Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")						Minimum Safeguards (17) Y/N	Proportion of Taxonomy-aligned (A.1) or -eligible (A.2) CapEx, 2024 (18) %	Proportion of Taxonomy-aligned (A.1) or -eligible (A.2) CapEx, 2023 (19) %	Category enabling activity (20) M	Category transitional activity (21) S
				Climate Change Mitigation (5) %	Climate change adaptation (6) %	Water (7) %	Pollution (8) %	Circular Economy (9) %	Biodiversity (10) %	Climate Change Mitigation (11) Y/N	Climate Change Adaptation (12) Y/N	Water (13) Y/N	Pollution (14) Y/N	Circular Economy (15) Y/N	Biodiversity (16) Y/N					
<b>Economic activities (1)</b>																				
<b>A. Taxonomy-eligible activities</b>																				
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%																	
<b>CapEx of Taxonomy-eligible activities (A.1 + A.2)</b>		<b>0</b>	<b>0%</b>																	
<b>B. Taxonomy-non-eligible activities</b>																				
<b>CapEx of Taxonomy-non-eligible activities (B)</b>		<b>0.5</b>	<b>100%</b>																	
<b>Total (A + B)</b>		<b>0.5</b>	<b>100%</b>																	

Capital expenses included in the taxonomy assessment are defined as additions of tangible and intangible assets during the financial year before depreciation, amortization, and revaluations, including revaluations due to changes in valuation and impairments during the financial year, excluding changes in fair value (2021/2178).

Innofactor's capital costs (0.5 million euros) include activations of employee's laptops and other equipment.

## E1-2 Policies Related to Climate Change Mitigation and Adaptation

Innofactor adheres to its own environmental policy and recognizes the significance of climate change mitigation as part of its sustainability strategy.

Innofactor's environmental policy guides the measures aimed at responding to the challenges caused by climate change and reducing the adverse environmental impacts of the company's operations. The environmental policy defines the principles that are always observed in Innofactor's own operations and in the delivery of solutions to customers. The principles of Innofactor's environmental policy include continuous development, improvement of preventative actions, and reacting to the changing operating environment.

The energy consumption of Innofactor's offices is monitored regularly and reduced as much as possible. As Innofactor's premises are located in leased properties, we can only partially influence the electricity consumption of our offices. The company uses modern collaboration tools and favors online meetings over business travel. The environmental policy applies to the entire Innofactor Group and is available in its entirety on the Innofactor website and for internal stakeholders in the organization's own quality management system.

Innofactor's environmental policy will be updated in 2025. Going forward, it will also address the deployment of renewable energy in the organization. Some of Innofactor's premises are within the scope of renewable energy, and the share of renewable energy consumption of total energy consumption is reported on in paragraph *E1-5 Energy Consumption and Mix*.

Innofactor's sustainability steering group is responsible for the implementation and monitoring of the environmental policy. The company's management is represented in the sustainability steering group by the CFO and the Chief People Officer.

Innofactor does not have policies aimed at climate change adaptation.

## E1-3 Actions and Resources in Relation to Climate Change Policies

Innofactor's key climate change mitigation measures and the resources allocated to their implementation during 2024 were as follows:

- A project focused on setting emission reduction targets and creating a transition plan for climate change mitigation, on which an estimated five person-days were used. The project concerns the entire Innofactor Group.
- Renewable district heat was used as the form of heating for the Espoo Campus for the first time. Switching the form of heating for the Campus to renewable energy reduced the emissions caused by the heating of the company's premises by 57% when compared to 2023.

The planned climate change mitigation measures for 2025 are as follows:

- Working on the transition plan for climate change mitigation. The transition plan will apply to the entire Innofactor Group.
- Setting Innofactor's emission reduction targets and having them validated by the *Science Based Targets Initiative (SBTi)* in 2025. As part of target-setting, Innofactor will also specify measures aimed at achieving the emission reduction targets within the specified time frame, as well as a plan for the implementation of the measures and the parties responsible for them. The emission reduction targets will apply to the entire Group.

The implemented and planned climate change mitigation measures did not require significant capital expenditures or operational expenditures during the reporting period and, according to the current estimate, they will not require significant capital expenditures or operational expenditures.

## 1-4 Targets Related to Climate Change Mitigation and Adaptation

*The Science Based Targets Initiative (SBTi)* is an international initiative aimed at promoting climate action in the private sector by supporting companies in setting science-based climate emission reduction targets for their operations. Innofactor joined the initiative in March 2025.

In 2024, Innofactor began to work on setting its own emission reduction targets. When the targets are completed, SBTi validation will be sought for them in 2025. Innofactor will disclose its emission reduction targets and the measures planned to promote their achievement, and the monitoring process, in its sustainability report on the year 2025.

In 2024, Innofactor did not separately monitor the effectiveness of its climate-related policies and actions in relation to the material climate-related impacts, risks or opportunities, and the company has not set targets related to climate change adaptation.

<b>E1-5 Energy Consumption and Mix</b>	<b>2024</b>
Total fossil energy consumption (MWh)	174.1
Share of fossil sources in total energy consumption (%)	9.1
Consumption from nuclear sources (MWh)	22.1
Share of consumption from nuclear sources in total energy consumption (%)	1.2
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	6.6
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1,562.0
Consumption of self-generated non-fuel renewable energy (MWh)	0.9
Total renewable energy consumption (MWh)	1,569.5
Share of renewable sources in total energy consumption (%)	81.8
Total energy consumption (MWh)	1,917.5

## **Energy Intensity per Net Sales** **2024**

Total energy consumption from activities in high climate impact sectors per net sales from activities in high climate impact sectors (MWh/1,000 €)	0.025
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Innofactor's energy intensity is calculated by dividing total energy consumption by the Group's net sales. The Group's net sales figure reported in the consolidated financial statements has been used to calculate the energy intensity.

## **E1-6 Gross Scopes 1, 2, 3 and Total GHG Emissions**

The principles, requirements and guidelines set out in the *GHG Protocol Corporate Standard* have been taken into account in the calculation of Innofactor's GHG emissions. The emissions calculation has been carried out by an external service provider based on data collected by Innofactor's employees. The results are presented as carbon dioxide equivalents (CO<sub>2</sub>eq). Carbon dioxide equivalent refers to the standardized environmental impact of different GHG emissions.

The functional boundary for the calculation is based on emissions caused by operations that are under the company's control, and the value chain emissions that have been included are the emissions that are the most relevant to the company's operations. Of Scope 1 emissions, the calculation included emissions caused by the fuel consumption of vehicles leased by the company and emissions from the consumption of liquefied petroleum gas at one operating location. Of Scope 2 emissions, the calculation included emissions caused by the consumption of electricity, district heat and district cooling at our operating locations. The Scope 3 emissions calculation included procurement (IT procurement and the most significant cloud and data center services), waste generated in operations (waste by fraction and wastewater), business travel (travel by car, flights and hotel nights) and emissions arising from employee commuting.

In the category of procurement-related emissions, cloud and data center services were included in the calculation for the first time. Under IT procurement, phones and computers had already been taken into account previously, and the calculation was expanded in 2024 to also include purchased external displays. In the category of waste generated by the operating locations, only wastewater had been taken into account in previous years but, in 2024, the calculation was expanded to also include waste by fraction. The calculation covered 15 Innofactor Group sites: Espoo, Kuopio, Lappeenranta, Tampere, Turku, Kajaani, Oulu and Jyväskylä in Finland, Stockholm, Sundsvall and Gothenburg in Sweden, Oslo, Bergen and Trondheim in Norway, and Copenhagen in Denmark. Emissions caused by commuting have been calculated for the first time on the basis of a commuting survey sent out to Innofactor's entire personnel. The survey was conducted in February 2025 and the response rate was 34 percent of the entire personnel. In 2023, emissions from employee commuting were estimated on the basis of the results of the National Travel Survey carried out by the Finnish Transport and Communications Agency.

Information on the input data, boundaries, emission factors and their accuracy is provided in the table *Input Data, Boundaries and Emission Factors Used in GHG Emission Calculations*. Scope 3 emission sources excluded from the calculation are described in the table *Value Chain Emission Sources Excluded from the Calculation*.

<b>Scope 1 GHG Emissions</b>	2022	2023	<b>2024</b>
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	11.4	9.4	9.7
Own energy production	-	-	0.1
Vehicle fuels	11.4	9.4	9.7
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0

<b>Scope 2 GHG Emissions</b>	2022	2023	2024
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	-	-	200.7
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	184.3	187.8	80.5
Heating (location-based)	-	-	173.5
Heating (market-based)	174.9	176.6	35.3
Electricity (location-based)	-	-	27.2
Electricity (market-based)	9.4	11.2	45.2

<b>Significant Scope 3 GHG Emissions</b>	2022	2023	2024
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)	187.6	246.7	370.4
1 Purchased goods and services	43.2	22.3	44.3
IT procurement	43.2	22.3	38.5

	2022	2023	2024
Cloud computing and data center services	-	-	5.9
5 Waste generated in operations	1.2	1.6	14.1
Waste	-	-	13.5
Wastewater	1.2	1.6	0.6
6 Business travel	143.2	166.3	155.5
Business travel by car	32.4	38	39.6
Flights	96.4	111.5	93.2
Hotel nights	14.4	16.8	22.6
7 Employee commuting	-	56.5*	156.5

### Total GHG Emissions

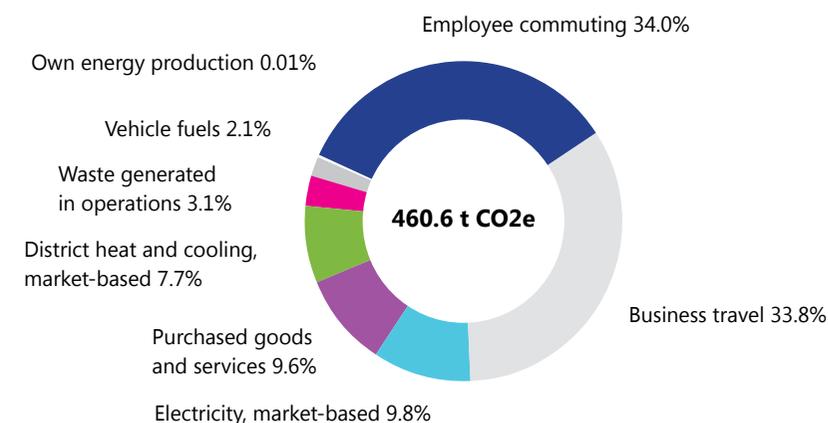
Total GHG emissions (location-based) (tCO <sub>2</sub> eq)	-	-	580.9
Total GHG emissions (market-based) (tCO <sub>2</sub> eq)	383.3	443.9*	460.6

\* The total emissions for 2023 have been adjusted after the publication of the 2023 Annual Report to include an estimate of the Scope 3 GHG emissions caused by employee commuting. The estimate was based on the National Travel Survey carried out by the Finnish Transport and Communications Agency.

### GHG Intensity per Net Sales

Total GHG emissions (location-based) per net sales (tCO <sub>2</sub> eq/1,000 €)	0.007
Total GHG emissions (market-based) per net sales (tCO <sub>2</sub> eq/1,000 €)	0.006

Innofactor's GHG emissions intensity is calculated by dividing total location-based or market-based GHG emissions by the Group's consolidated net sales. The Group's net sales figure reported in the consolidated financial statements has been used to calculate the GHG emissions intensity.



Innofactor Group's location-based total carbon footprint for 2024 was 580.9 tCO<sub>2</sub>eq. Innofactor Group's market-based total carbon footprint for 2024 was 460.6 tCO<sub>2</sub>eq.

Total location-based GHG emissions per net sales came to 0.007 tCO<sub>2</sub>eq/1,000 €. Total market-based GHG emissions per net sales came to 0.006 tCO<sub>2</sub>eq/1,000 €.

## E1-6 Input data, Boundaries and Emission Factors Used in GHG Emission Calculations

Scope	Emission source	Calculation method	Data source and boundaries	Accuracy of the data source	Source of the emission factor	Accuracy of the emission factor
Scope 1	Own energy production	Consumption-based (entire property)	Consumption data from the site, consumption apportioned from the entire property's consumption based on the floor area used by the company.	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Fuel Classification, Statistics Finland, 2024	Fairly accurate: Secondary data, the emission factor is based on common databases.
Scope 1	Vehicle fuels	Distance-based	The fuel consumption of vehicles under the company's control has been estimated based on kilometers driven and the reported consumption of each vehicle (l/100 km).	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Fuel Classification, Statistics Finland, 2024	Fairly accurate: Secondary data, the emission factor is based on common databases.
Scope 2	Electricity	Consumption-based (entire property), apportioned based on floor area	Site-specific consumption data from 13 sites, consumption apportioned from the entire property's consumption based on the floor area used by the company.	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Supplier-specific factors and country-specific residual mixes (market-based), and national averages (location-based)	Fairly accurate: Secondary data, the emission factor is based on common databases.
		Estimation based on the company's other sites	For two sites (Copenhagen and Trondheim), the consumption has been estimated using the average consumption of other sites (kWh/m <sup>2</sup> ).	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Supplier-specific factors (market-based) and national averages (location-based)	Fairly accurate: Secondary data, the emission factor is based on common databases.
Scope 2	District heating and cooling	Consumption-based (entire property), apportioned based on floor area	Site-specific consumption data from 13 sites, consumption apportioned from the entire property's consumption based on the floor area used by the company.	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Supplier-specific factors (market-based) and national averages (location-based)	Fairly accurate: Secondary data, the emission factor is based on common databases.
		Estimation based on the company's other sites	For two sites (Copenhagen and Trondheim), the consumption has been estimated using the average consumption of other sites (kWh/m <sup>2</sup> ).	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Supplier-specific factors (market-based) and national averages (location-based)	Fairly accurate: Secondary data, the emission factor is based on common databases.

Scope	Emission source	Calculation method	Data source and boundaries	Accuracy of the data source	Source of the emission factor	Accuracy of the emission factor
Scope 3, category 1	Procurement	Consumption-based	Number of IT procurements (number), cloud services (emissions report). Other procurements and services excluded because the data on them is inaccurate.	Accurate: Primary data, the emission source can be measured accurately.	The service provider's emissions report (11.8%), IT procurements Base Carbone (88.2%)	Fairly accurate: Secondary data, the emission factor is based on common databases.
Scope 3, category 5	Waste	Consumption-based (entire property), apportioned based on floor area	For Espoo, Kuopio, Lappeenranta, Oulu, Tampere, Oslo and Bergen, the waste volumes of the sites, broken down by waste fraction, for the entire property, apportioned on the basis of the floor area used by the company.	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Ecoinvent 3.10, WWF	Fairly accurate: Secondary data, the emission factor is based on common databases.
		Estimation based on the company's other sites	Estimate of waste volumes for the sites in Turku, Jyväskylä, Sundsvall, Gothenburg, Copenhagen and Trondheim. The estimate is based on the waste volumes of other sites (tonne of waste/m2).	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Ecoinvent 3.10, WWF	Fairly accurate: Secondary data, the emission factor is based on common databases.
	Wastewater	Consumption-based (entire property), apportioned based on floor area	For Espoo, Kuopio, Lappeenranta, Tampere, Turku (4–12/2024), Oulu, Jyväskylä, Stockholm, Sundsvall, Oslo and Bergen, water consumption data for the entire property. Consumption apportioned from the entire property's consumption based on the floor area used by the company. The assumption is that the amount of wastewater is equal to water consumption.	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Ecoinvent 3.10	Fairly accurate: Secondary data, the emission factor is based on common databases.
		Estimation based on the company's other sites	For Turku (1–3/2024), Gothenburg, Copenhagen and Trondheim, an estimate of water consumption. The estimate is based on the consumption of other sites (m3 of waste/m2).	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Ecoinvent 3.10	Fairly accurate: Secondary data, the emission factor is based on common databases.

Scope	Emission source	Calculation method	Data source and boundaries	Accuracy of the data source	Source of the emission factor	Accuracy of the emission factor
Scope 3, category 6	Business travel	Distance-based (cars, flights), cost-based (nights)	Journeys driven by car (kilometer allowances, EUR/DKK/NOK), flights (estimated distance according to departure and destination) and costs of hotel nights (EUR/NOK/DKK/SEK).	Fairly accurate: Secondary data, the emission source can only be measured indirectly or computationally.	Statistics Finland, Defra	Fairly accurate: Secondary data, the emission factor is based on common databases.
Scope 3, category 7	Employee commuting	Distance-based	Commuting survey for the personnel. Response rate 34%, the responses have been scaled to apply to the entire personnel. Data on kilometers traveled.	Inaccurate: The emission source is based on indicative literature or some other data source or assumption.	Defra, VTT Technical Research Centre of Finland	Fairly accurate: Secondary data, the emission factor is based on common databases.

### Value Chain Emission Sources Excluded from the Calculation

Emission source	Grounds for exclusion
2 Capital goods	No significant emission sources
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	No significant emission sources
4 Upstream transportation and distribution	No emission sources
8 Upstream leased assets	No significant emission sources
9 Downstream transportation	No emission sources
10 Processing of sold products	No emission sources
11 Use of sold products	No emission sources
12 End-of-life treatment of sold products	No emission sources
13 Downstream leased assets	No emission sources
14 Franchises	No emission sources
15 Investments	No emission sources

## **E1-7 GHG Removals and GHG Mitigation Projects**

### **Financed through Carbon Credits**

During the reporting period, Innofactor did not take measures to enhance natural sinks or apply technical solutions to remove GHGs from the atmosphere in its own operations or upstream and downstream value chain.

Innofactor finances carbon sequestration projects by purchasing carbon credits in certified GHG emission mitigation projects outside the company's value chain. In 2024, Innofactor purchased carbon credits corresponding to its 2023 GHG emissions, amounting to 444 tCO<sub>2</sub>eq (Resex Rio Redd+ Project, 222 tCO<sub>2</sub>eq and Safe Water Project, Uganda, 222 tCO<sub>2</sub>eq). Similarly, in 2025, Innofactor will purchase carbon credits corresponding to its market-based GHG emissions for 2024, amounting to 460.6 tCO<sub>2</sub>eq. A decision on the financing of carbon sequestration projects is made annually.

## **ESRS S1 – Own Workforce**

### **S1-1 Policies Related to Own Workforce**

Innofactor complies with local collective agreements and local legislation. Policies related to the personnel are documented in the HR policy process description. In addition to compliance with local legislation, Innofactor is committed to the ILO and UN principles and practices concerning human rights as applicable. The Chief People Officer has operational responsibility for implementing and developing personnel policies and generally considering social responsibility related to the workforce in Innofactor's operations.

KPIs have been documented for personnel-related risks, and they are monitored on a regular basis as part of HR and business processes. The KPIs are monitored at the level of the entire personnel, at the country-specific level, and at the level of the Group's different business areas. The reported figures have been calculated in accordance with the standard and, with regard to personnel, they are mainly based on data obtained from Innofactor's ERP system or employee satisfaction system and from the insurance company.

The key elements of Innofactor's corporate culture include a flat hierarchy, close communication and good co-operation with personnel representatives (e.g. shop steward and occupational safety delegate). Innofactor has an occupational health and safety action program that is focused on occupational safety aspects that are relevant to the company's operations, such as first aid skills, ergonomics and rescue drills. Innofactor prioritizes the well-being of its employees and their ability to manage work demands, as the most significant risks to work ability in expert roles are related to coping with these demands.

In accordance with Innofactor's HR policy, there is zero tolerance for discrimination, harassment and bullying. The personnel are committed to these policies as part of the induction training process. The HR function takes action to address all incidents of discrimination, harassment and bullying, and they are investigated on a case-by-case basis. Innofactor has not identified, based on employee characteristics, any employee groups in its own workforce that would be subject to different impacts or risks than the personnel as a whole. Innofactor's operating culture encourages everyone to "Be the Real You" and it is based on the "People First" principle.

Innofactor has also focused on the equal treatment of applicants in its recruitment process. For example, applicants are not asked about gender as part of the recruitment process. In accordance with the company's sustainability strategy, Innofactor aims to be inclusive and supervisors are trained on the theme of inclusivity. In line with Innofactor's Employee Value Proposition, "Be the Real You", everyone at Innofactor can be exactly who they are.

### **S1-2 Processes for Engaging with Own Workers and Workers' Representatives about Impacts**

Innofactor has a culture of open dialogue that encourages feedback and the sharing of information. The company facilitates communication and the sharing of information by means of internal communications, news and briefings. Group-wide result briefings are organized on a quarterly basis, and country-specific and business-specific briefings are organized on a monthly

basis to ensure that the personnel have as comprehensive a picture as possible of the situation of the business and current issues. The Chief People Officer is part of the Executive Board, which helps to ensure that the voice of the personnel is heard throughout the organizational hierarchy.

Innofactor conducts a weekly employee satisfaction survey that provides everyone with the opportunity to give anonymous feedback and discuss matters with their supervisor, business management and HR.

The shop steward and occupational safety delegate also serve as the mouthpiece of the personnel towards the employer. We always comply with the local legislation with regard to employee representation.

### **S1-3 Processes to Remediate Negative Impacts and Channels for Own Workers to Raise Concerns**

In accordance with Innofactor's HR policy, there are several channels for giving feedback and raising concerns. Concerns can be expressed directly to one's supervisor, the HR function or personnel representatives, and they are handled in accordance with Innofactor's internal processes, depending on the nature of the matter and how it was raised. Concerns can be raised anonymously via the company's internal whistleblowing channel or the weekly employee satisfaction survey, which all employees can access through the devices they use for their work. The results of the employee satisfaction survey are reviewed on a monthly basis in personnel briefings. To ensure the anonymity of the employee satisfaction survey, the survey is carried out by a third party and the processing of the data is documented on the intranet. As part of the induction training process, each employee acknowledges in writing their commitment to zero tolerance and the obligation to report any observations of bullying, harassment and discrimination.

### **S1-4 Taking Action on Material Impacts on Own Workforce, and Approaches to Mitigating Material Risks and Pursuing Material Opportunities Related to Own Workforce, and Effectiveness of Those Actions**

In accordance with Innofactor's sustainability strategy, the company puts people first in everything it does and supports the well-being and development of its personnel. Additionally, Innofactor is committed to fairness and promotes equality, diversity and inclusion. Maintaining a healthy work-life balance and the ability to cope with the demands of work are important aspects of Innofactor's culture, and the company aims to support these through flexible working conditions, comprehensive occupational health services and good leadership.

During the reporting period, measures taken in relation to these topics included reduced working time arrangements, training for managers, an early intervention model and close co-operation between occupational health, supervisors and the personnel (tripartite co-operation). Through these measures, Innofactor aims to, particularly in the short- and medium-term, minimize personnel turnover, promote the well-being of the personnel and take into consideration factors related to individual employees' ability to cope with the demands of work and factors related to their life circumstances. These measures are key aspects of Innofactor's policies related to social responsibility. Innofactor has planned similar measures for the next year as those implemented during the reporting period.

Innofactor provides ergonomic workstations at all its operating locations. The personnel have the right to take the necessary breaks during the workday. The personnel benefits support well-being and help employees cope with work demands. Innofactor aims for continuous improvement in workplace well-being and monitors progress through a weekly employee satisfaction survey. Each year, the company strives to develop its operations and adopt new practices and benefits based on employee feedback.

Impacts and measures that are significant with regard to the company's workforce are monitored and developed by the HR function, which employed an average of seven people in 2024. In Innofactor's organizational model, People Managers also play a key role with regard to personnel-related impacts. They work as full-time supervisors in the business units. In 2024, there were 10 People Managers. These functions are responsible for preventing negative

impacts related to the company's own workforce and advancing positive impacts.

### 1-5 Targets Related to Managing Material Negative Impacts, Advancing Positive Impacts, and Managing Material Risks and Opportunities

Innofactor monitors employee satisfaction and the personnel's personal perceptions (weekly pulse), sickness-related absences, personnel turnover and the development of personnel competence. In 2024, Innofactor's employee satisfaction was at a good level at 7.5/10 (2023: 7.4/10). The company works continuously to ensure that Innofactor is the best possible workplace for its personnel. Therefore, the target is to maintain employee satisfaction above 7.5/10.

Innofactor monitors sickness-related absences as a percentage of total hours worked. Sickness-related absences at Innofactor are at a level that is typical for the industry. In 2024, the sickness-related absence rate was 2.8% (2023: 2.2%), and the target is to keep the rate of sickness-related absences low (less than 2.5%).

One occupational accident occurred at Innofactor in 2024. The incident did not lead to an absence or permanent harm or injuries.

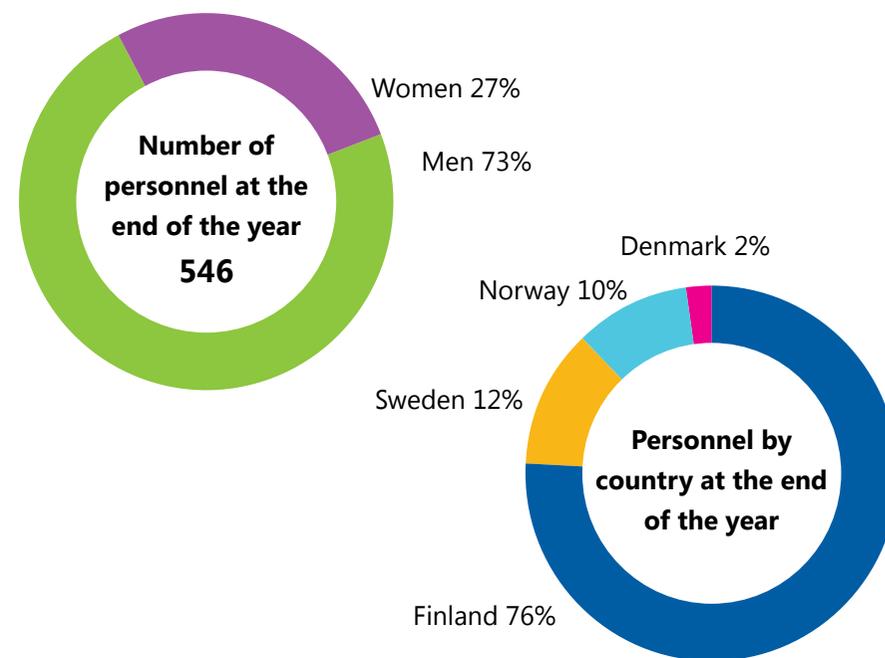
In 2024, personnel turnover was at a moderate level at 11.5% (2023: 15.1%), and the target is to keep personnel turnover at a moderate level going forward. Among Innofactor's active personnel, the average duration of employment was six years in 2024.

With regard to competence development, Innofactor does not measure hours spent on studying, as a large part of learning takes place as part of day-to-day work and challenging customer projects. The training metric monitored is the number of certificates among Innofactor's personnel engaged in customer work (such as Microsoft certificates, ITIL, PRINCE and SCRUM). In 2024, Innofactor employees had a total of 1,006 certificates relevant to their work. Innofactor has not set any specific targets for the number of certificates. Instead, certification is driven by the requirements of Microsoft and the company's customers.

The above-mentioned targets apply to the objectives of Innofactor's HR process and business operations, and they apply to the entire personnel. Targets are set annually and the development of the metrics is monitored and evaluated on an ongoing basis. The Chief People Officer participates in the setting of the targets with the business management. Targets and outcomes are openly reviewed with the personnel in personnel briefings. Target-setting takes into account feedback received during the previous year from the personnel, personnel representatives, and supervisors.

### S1-6 Characteristics of the Undertaking's Employees

Innofactor monitors the number of active personnel. The number of active personnel does not include employees who are on an absence of more than three months. Personnel turnover in 2024 was 11.5% (2023: 15.1%). A total of 77 employees left Innofactor in 2024. The figures reported below with regard to employees reflect the situation on the last day of 2024.



	Personnel	Male	Female
All personnel	546	73%	27%
Finland	417	73%	27%
Sweden	68	72%	28%
Norway	52	75%	25%
Denmark	9	78%	22%
Permanent employees	541	73%	27%
Temporary	5	60%	40%
Hourly	5	40%	60%

### S1-7 Characteristics of Non-Employee Workers in the Undertaking's Own Workforce

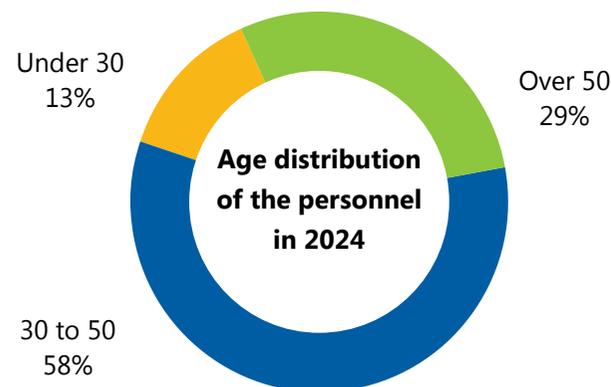
A total of 98 workers employed by subcontractors worked at Innofactor in 2024. The age and gender distribution of subcontractors' employees is not reported. Most of Innofactor's subcontracting agreements are flexible (hourly) and based on customer needs.

### S1-8 Collective Bargaining Coverage and Social Dialogue

Innofactor's employees in Finland are subject to Innofactor's company-specific collective agreement, excluding the management (the coverage of the collective agreement is 94%). Only one collective agreement is applied to Innofactor's personnel in Finland. The personnel in Sweden are subject to a local collective agreement (96% coverage). The personnel in Norway and Denmark are not covered by a collective agreement. The collective agreement coverage for the entire personnel is 84%.

### S1-9 Diversity Metrics

The gender diversity of the Executive Board is disclosed above in the paragraph GOV-1 *The Role of the Administrative, Management and Supervisory Bodies*.



### S1-10 Adequate Wages

Innofactor pays all employees at least the minimum wage in accordance with the legislation of each country, as well as the minimum wage stipulated by the applicable collective agreements.

### S1-11 Social Protection

Innofactor's employees reside in the European Economic Area and are subject to the applicable national legislation regarding social security. Innofactor has employees in Finland, Sweden, Norway and Denmark.

### S1-12 Persons with Disabilities

Innofactor does not collect or process data on persons with disabilities for reporting purposes and does not consider the collection or processing of such data to satisfy the necessity requirement laid down in the Act on the Protection of Privacy in Working Life.

### **S1-13 Training and Skills Development Metrics**

At Innofactor, learning takes place as part of day-to-day work, combined with self-study, training and certificates. Innofactor also focuses on high-quality induction training. In accordance with the annual calendar, supervisors hold quarterly feedback discussions to review targets and outcomes.

As part of the employee satisfaction survey, the personnel are asked about their perceptions regarding opportunities for personal development. The survey questions are "Do you feel that you have the opportunity to learn and develop your skills" and "Do you feel that you receive sufficient training and development opportunities to perform your work". In 2024, both of these metrics were at a good level at 7/10 (2023: 7/10).

### **S1-14 Health and Safety Metrics**

Innofactor complies with local legislation and collective agreements regarding the organization of occupational safety and health. Healthcare is arranged in accordance with local practices and each employee is covered by healthcare services. Innofactor's operations consist of office work, which is why occupational accidents primarily occur in connection with commuting.

- In 2024, the number of fatalities as a result of work-related injuries and work-related ill health was 0 (2023: 0).
- In 2024, the number of occupational accidents was 1 (2023: 0). In 2024, the number of occupational accidents during commuting was 6 (2023: 3).
- In 2024, the number of incidents of work-related ill health (occupational diseases) was 0 (2023: 0).
- In 2024, the number of lost days due to fatalities resulting from occupational accidents, injuries or ill health was 0 (2023: 0).
- In 2024, the rate of work-related injuries was 1 (2023: 0).

### **S1-15 Work-Life Balance Metrics**

All Innofactor employees are entitled to family-related leave in accordance with the social policy and/or applicable collective agreements. Persons on a director's contract are also entitled to family leave in accordance with the collective agreements.

In 2024, the percentage of the entire personnel of employees taking family leave was 9.7% (2023: 6.8%), of which 32% were women (2023: 33%) and 68% were men (2023: 67%).

In addition, under Innofactor's company-specific collective agreement, the first 36 days of the parental leave period after pregnancy leave are compensated equally for the non-birthing parent.

### **S1-16 Compensation Metrics (Pay Gap and Total Compensation)**

Innofactor's pay policy is based on treating employees as equally as possible. Pay is influenced by the role and the demands of the job, as well as the person's experience and competence. Pay comparisons between the Nordic countries are challenging due to differences in currency and cost level. For this reason, only the figures for Innofactor's employees in Finland are reported in this section.

- Gender pay gap 2024: 6% (2023: 8%)
- The annual total remuneration ratio for Finland in 2024 was 38% (2023: 38%)

The CEO's remuneration is described in the annual remuneration report.

### **S1-17 Incidents, Complaints and Severe Human Rights Impacts**

Innofactor has zero tolerance for bullying, harassment and discrimination. In 2024, there were no reported incidents of discrimination (including harassment) or human rights violations at Innofactor, and Innofactor was not subject to any fines, penalties or compensation for damages related to such incidents.

## **ESRS G1 – Business Conduct**

Disclosure requirement G1-6 Payment practices has been assessed to be non-material on the basis of Innofactor's double materiality assessment.

### **G1-1 Business Conduct Policies and Corporate Culture**

Transparent business in accordance with high ethical standards is the basis of all of Innofactor's operations. Guidelines on business conduct at Innofactor are available to the personnel via Innofactor's quality management system. Potential violations can be detected as part of internal quality audits and, in addition, Innofactor applies the following means and measures to implement policies related to business conduct:

- **The Code of Conduct** lays down the general principles and guidelines that all of our employees must commit to. A test on the Code of Conduct is mandatory for new employees. No separate Code of Conduct training was organized in 2024.
- **Anti-bribery and anti-corruption guidelines.** With regard to anti-bribery and anti-corruption activities, Innofactor has assessed that the largest risk group concerning bribery and corruption are the persons responsible for sales in the company.
- **Internal whistleblowing channel** for reporting any suspected misconduct or unethical activities. Reports can also be submitted anonymously.

Whistleblower reports are processed by independent persons and always in compliance with the local legislation governing whistleblower protection. As a rule, whistleblower reports are processed without delay by the Group's lawyer, and the whistleblowing channel is accessible via Innofactor's intranet. If necessary, an independent committee is established to handle the matter, and external experts may be used.

The opportunities of the personnel to raise concerns are also described above in paragraph *S1-3 Processes to Remediate Negative Impacts and Channels for Own Workers to Raise Concerns*.

### **G1-2 Management of Relationships with Suppliers**

Innofactor has processes concerning partners and subcontracting. These processes set requirements for Innofactor's suppliers. Innofactor does not have separate guidelines concerning payments to small and medium-sized undertakings. Instead, Innofactor adheres to the terms of each agreement.

At the start of each procurement or partnership, each party approving the procurement at Innofactor is obligated to ensure that the selected partner is committed to Innofactor's Code of Conduct, or it has otherwise been ensured that the partner meets the standards of ethical business conduct that Innofactor requires from its partners (for example, through the partner's own Code of Conduct or similar policy).

Innofactor has not identified its subcontracting chains or technology partners as particularly at-risk, taking sustainability themes into account. However, Innofactor continuously evaluates this and reacts to deficiencies or risks observed in the partners' operations as necessary.

### **G1-3 Prevention and Detection of Corruption and Bribery**

Innofactor has zero tolerance for bribery and corruption. Innofactor has an anti-corruption and anti-bribery policy that has been approved by the Board of Directors and supplements the Code of Conduct. In 2024, a concise briefing

was arranged for the sales organization regarding the policy. The topic is also included in the Code of Conduct training aimed at the entire personnel and the onboarding of new employees as part of induction training on the Code of Conduct. Innofactor does not separately monitor the number of regular participants in these training activities. In 2025, Innofactor will assess the need to target anti-corruption and anti-bribery training at separately identified risk groups.

#### **G1-4 Confirmed Incidents of Corruption or Bribery**

In 2024, Innofactor did not receive any reports of suspected incidents of corruption or bribery.

#### **G1-5 Political Influence and Lobbying Activities**

In 2024, Innofactor did not make any direct or indirect financial or in-kind contributions to political purposes or lobbying activities. During the reporting period, none of the members of Innofactor's Board of Directors or Executive Board had held a comparable position in public administration in the two years preceding their appointment.

Innofactor is registered in the EU Transparency Register (identification number 662561951167–22). Innofactor is a member of the following advocacy organizations:

- Software Finland Association
- Technology Industries of Finland

## **Data Security and Data Protection**

Innofactor has identified the significance of data security and data protection as part of sustainable business in the IT sector and sustainability reporting. Innofactor will assess reporting related to data security and data protection in more detail in 2025.

Administrative sanctions are a metric that Innofactor has already considered to be important in previous years. In 2023 and 2024, the number of GDPR-related administrative sanctions on Innofactor was 0.

Innofactor's management has identified several critical cyber risk scenarios against which a company needs to protect itself. The company is committed to protecting its customers' and partners' information and systems and naturally, Innofactor as a company itself. In order to ensure the level of information security corresponding to the risks, Innofactor maintains a certified information security management system in accordance with the ISO27001 standard.

In its operations, Innofactor is committed to maintaining a high level of data protection and respects the privacy and rights of its personnel, customers and users. Through regular internal audits and the continuous development of data security, Innofactor develops its internal processes and practices related to data protection and data security.

Information security and data protection are mandatory parts of induction training in addition to continuous training on information security and data protection. The company's personnel are required to complete mandatory data security training once every two years. The content of the training is updated annually. Innofactor's information security group meets regularly to guide the development and implementation of information security and data protection at Innofactor. The company has a designated information security manager and a data protection officer.

## IRO-2 List of Data Points Based on Other EU Regulation

Disclosure requirement	Data point	In the report	The sustainable finance disclosure regulation reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference
ESRS 2 GOV-1 Board's gender diversity	21 (d)	GOV-1 The role of the administrative, management and supervisory bodies	●		●	
ESRS 2 GOV-1 Percentage of board members who are independent	21 (e)	GOV-1 The role of the administrative, management and supervisory bodies			●	
ESRS 2 GOV-4 Statement on due diligence	30	GOV-4 Statement on due diligence	●			
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities	40 (d) i	Not included in the report – not material	●	●	●	
ESRS 2 SBM-1 Involvement in activities related to chemical production	40 (d) ii	Not included in the report – not material	●		●	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons	40 (d) iii	Not included in the report – not material	●		●	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco	40 (d) iv	Not included in the report – not material			●	
ESRS E1-1 Transition plan to reach climate neutrality by 2050	14	E1-1 Transition plan for climate change mitigation				●
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks	16 (g)	E1-1 Transition plan for climate change mitigation		●	●	
ESRS E1-4 GHG emission reduction targets	34	E1-4 Targets related to climate change mitigation and adaptation	●	●	●	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	38	Not included in the report – not material	●			

Disclosure requirement	Data point	In the report	The sustainable finance disclosure regulation reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference
ESRS E1-5 Energy consumption and mix	37	E1-5 Energy consumption and mix	●			
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors	40-43	Not included in the report – not material	●			
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	44	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	●	●	●	
ESRS E1-6 Gross GHG emissions intensity	53-55	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	●	●	●	
ESRS E1-7 GHG removals and carbon credits	56	E1-7 GHG removals and GHG mitigation projects financed through carbon credits				●
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks	66	Innofactor has omitted the disclosure requirement for the first year of the sustainability report			●	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66	66 (a)	Innofactor has omitted the disclosure requirement for the first year of the sustainability report		●		
ESRS E1-9 Location of significant assets at material physical risk	66 (c)	Innofactor has omitted the disclosure requirement for the first year of the sustainability report		●		
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes	67 (c)	Innofactor has omitted the disclosure requirement for the first year of the sustainability report		●		
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities	69	Innofactor has omitted the disclosure requirement for the first year of the sustainability report			●	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	28	Not included in the report – not material	●			

<b>Disclosure requirement</b>	<b>Data point</b>	<b>In the report</b>	<b>The sustainable finance disclosure regulation reference</b>	<b>Pillar 3 reference</b>	<b>Benchmark regulation reference</b>	<b>EU climate law reference</b>
ESRS E3-1 Water and marine resources	9	Not included in the report – not material	●			
ESRS E3-1 Dedicated policy	13	Not included in the report – not material	●			
ESRS E3-1 Sustainable oceans and seas	14	Not included in the report – not material	●			
ESRS E3-4 Total water recycled and reused	28 (c)	Not included in the report – not material	●			
ESRS E3-4 Total water consumption in m3 per net revenue on own operations	29	Not included in the report – not material	●			
ESRS 2 – IRO-1 – E4	16 (a) i	Not included in the report – not material	●			
ESRS 2 – IRO-1 – E4	16 (b)	Not included in the report – not material	●			
ESRS 2 – IRO-1 – E4	16 (c)	Not included in the report – not material	●			
ESRS E4-2 Sustainable land / agriculture practices or policies	24 (b)	Not included in the report – not material	●			
ESRS E4-2 Sustainable oceans / seas practices or policies	24 (c)	Not included in the report – not material	●			
ESRS E4-2 Policies to address deforestation	24 (d)	Not included in the report – not material	●			
ESRS E5-5 Non-recycled waste	37 (d)	Not included in the report – not material	●			
ESRS E5-5 Hazardous waste and radioactive waste	39	Not included in the report – not material	●			
ESRS 2 – SBM-3 – S1 Risk of incidents of forced labour	14 (f)	Not included in the report – not material	●			
ESRS 2 – SBM-3 – S1 Risk of incidents of child labour	14 (g)	Not included in the report – not material	●			

<b>Disclosure requirement</b>	<b>Data point</b>	<b>In the report</b>	<b>The sustainable finance disclosure regulation reference</b>	<b>Pillar 3 reference</b>	<b>Benchmark regulation reference</b>	<b>EU climate law reference</b>
ESRS S1-1 Human rights policy commitments	20	S1-1 Policies related to own workforce	●			
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	21	Not included in the report – not material			●	
ESRS S1-1 Processes and measures for preventing trafficking in human beings	22	Not included in the report – not material	●			
ESRS S1-1 Workplace accident prevention policy or management system	23	S1-1 Policies related to own workforce	●			
ESRS S1-3 Grievance/complaints handling mechanisms	32 (c)	S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns	●			
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph	88 (b), (c)	S1-14 Health and safety metrics	●		●	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness	88 (e)	S1-14 Health and safety metrics	●			
ESRS S1-16 Unadjusted gender pay gap	97 (a)	S1-16 Compensation metrics (pay gap and total compensation)	●		●	
ESRS S1-16 Excessive CEO pay ratio	97 (b)	S1-16 Compensation metrics (pay gap and total compensation)	●			
ESRS S1-17 Incidents of discrimination	103 (a)	S1-17 Incidents, complaints and severe human rights impacts	●			
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD	104 (a)	S1-17 Incidents, complaints and severe human rights impacts	●		●	
ESRS 2 – SBM-3 – S2 Significant risk of child labour or forced labour in the value chain	11 (b)	Not included in the report – not material	●			

<b>Disclosure requirement</b>	<b>Data point</b>	<b>In the report</b>	<b>The sustainable finance disclosure regulation reference</b>	<b>Pillar 3 reference</b>	<b>Benchmark regulation reference</b>	<b>EU climate law reference</b>
ESRS S2-1 Human rights policy commitments	17	Innofactor has omitted the disclosure requirement for the first year of the sustainability report	●			
ESRS S2-1 Policies related to value chain workers	18	Innofactor has omitted the disclosure requirement for the first year of the sustainability report	●			
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	19	Innofactor has omitted the disclosure requirement for the first year of the sustainability report	●		●	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	19	Innofactor has omitted the disclosure requirement for the first year of the sustainability report			●	
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain	36	Not included in the report – not material	●			
ESRS S3-1 Human rights policy commitments	16	Not included in the report – not material	●			
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	17	Not included in the report – not material	●		●	
ESRS S3-4 Human rights issues and incidents	36	Not included in the report – not material	●			
ESRS S4-1 Policies related to consumers and end-users	16	Not included in the report – not material	●			
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines	17	Not included in the report – not material	●		●	
ESRS S4-4 Human rights issues and incidents	35	Not included in the report – not material	●			

<b>Disclosure requirement</b>	<b>Data point</b>	<b>In the report</b>	<b>The sustainable finance disclosure regulation reference</b>	<b>Pillar 3 reference</b>	<b>Benchmark regulation reference</b>	<b>EU climate law reference</b>
ESRS G1-1 United Nations Convention against Corruption paragraph	10 (b)	G1-1 Business conduct policies and corporate culture	●			
ESRS G1-1 Protection of whistle-blowers	10 (d)	G1-1 Business conduct policies and corporate culture	●			
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws	24 (a)	G1-4 Confirmed incidents of corruption or bribery	●		●	
ESRS G1-4 Standards of anti-corruption and anti-bribery	24 (b)	G1-4 Confirmed incidents of corruption or bribery	●			

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