INNOFACTOR

Sustainability Report 2025

Innofactor Plc's Sustainability Report 2025

Content

Changes in Reporting

In 2024, Innofactor published an assured Sustainability Report prepared in accordance with the Corporate Sustainability Reporting Directive and the Finnish Accounting Act as applicable at the time.

For the year 2025, Innofactor is voluntarily publishing a Sustainability Report prepared in accordance with the ESRS standards. The Sustainability Report for 2025 has not been assured and is not a part of the Board of Directors' Report. Innofactor continuously monitors developments in the standards and assesses opportunities to further develop and simplify its Sustainability Report. Where applicable, the report also includes comparative information for 2024.

Sustainability at Innofactor

Innofactor's Double Materiality Assessment and Information to Be Reported

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

The sustainability steering group has not identified a need to update the results of the double materiality assessment described in this report, nor the information reported on the basis of that 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 and the standard is not included in reporting for 2025)
- ESRS G1 Business Conduct

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

Innofactor's sustainability efforts are guided by the company's approved business and sustainability strategies, as well as the ISO 9001, ISO 27001, ISO 13485, ISO 14001 and AQAP-2110 standards and the related processes and guidelines. In addition, Innofactor is committed to complying with the ILO Declaration on Fundamental Principles and Rights at Work, the UN Universal Declaration of Human Rights, the UN Sustainable Development Goals, and the principles of the ICC Business Charter for Sustainable Development. During 2025, Innofactor committed to science-based emissions reductions and established near-term science-based emissions reduction targets in accordance with the Science Based Targets initiative (SBTi).

Innofactor is committed to supporting the achievement of the United Nations Sustainable Development Goals (SDGs) by 2030. We have identified the SDGs that are most relevant to our business: SDG 8 Decent Work and Economic Growth, SDG 5 Gender Equality, and SDG 3 Good Health and Well-being. The standards addressed in this Sustainability Report are aligned with these goals.

Innofactor's Sustainability Strategy

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

Our sustainability strategy is divided into four focus areas:

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

The strategy focus areas and objectives are derived from the results of the stakeholder survey and internal workshops and have been approved by the Board of Directors. The sustainability strategy is aligned with the company's strategy, mission, values, employee value proposition and operating 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 that of the company's financial statements.

Regarding the value chain, the report includes information on Innofactor's own personnel and operations. For emissions calculations, IT equipment, cloud services and other purchased goods and services have been included from the value chain. The value chain is described in more detail in section SBM-1 Strategy, Business Model and Value Chain below.

In this report, Innofactor has not used the option to omit information relating to intellectual property, know-how, the results of innovation, or matters subject to ongoing negotiations or development.

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 greenhouse gas emissions calculations. The GHG emissions calculation is described in section E1-6 Gross Scopes 1, 2, 3 and Total GHG Emissions. In all other respects, the reported information has been obtained directly from the systems relating to the data in question.

This is the second time Innofactor publishes its sustainability report with this scope. For 2025, Innofactor has revised its emissions calculation methodology to better align with its SBTi commitment, and comparative figures for 2024 and 2023 have been recalculated accordingly. The GHG emissions calculation is described in section *E1-6 Gross Scopes 1, 2, 3 and Total GHG Emissions*. Innofactor has not identified any errors in information reported in previous reporting periods.

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

Use of Transitional Provisions

Innofactor continues to apply the transitional provision for disclosures required by ESRS S2 (Workers in the Value Chain), which has been preliminarily assessed as material. In addition, under the transitional provisions, Innofactor does not report Disclosure Requirement E1-9 under ESRS E1 Climate Change for 2025, which concerns the anticipated financial effects of material physical risks, transition risks and climate-related opportunities.

Taking into account the size and geographical scope of Innofactor, its customers, partners and subcontractors, Innofactor has identified working conditions and equal treatment as relevant topics in relation to workers in the value chain. The practices currently applied in relation to partners and subcontractors to address potential adverse impacts in the value chain are described in section *G1-2 Management of Relationships with Suppliers*. Innofactor does not apply separate metrics relating to value chain workers and has not yet established targets for them. Reporting, targets, metrics and methods of influence related to value chain workers will be assessed in greater detail during the transition period.

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

Innofactor's key bodies regarding sustainable development consist of the Board of Directors, the Group Executive Board, the sustainability steering group and the sustainability committee. In addition, Innofactor uses external sustainability consultants when necessary. In addition to the bodies described below, Innofactor's centralized HR function and the information security group also play a key role in sustainability management and are represented in the sustainability steering group.

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

Sustainability Management at Innofactor

Body	
Board of Directors	**Members**: In 2025, the Board of Directors consisted of **Antti Kummu** (Chair), **Sami Ensio** and **Timo Larjomaa**. In addition, **Risto Linturi** served as a member of the Board until May 13, 2025. The Board of Directors approves sustainability targets annually and monitors progress towards those targets at its meetings. Of the Board members, CEO Sami Ensio participates in the company's management as an executive. **Gender diversity:** There were no female members on the Board of Directors in 2025. **Responsibilities:** The Board of Directors has overall responsibility for sustainability reporting and resource allocation. The Board approves the sustainability strategy and the company's risk management principles. **Independence:** Until May 13, 2025, 50 per cent of the Board members were independent of the company and its significant shareholders. From May 16, 2025 onwards, 67 per cent of the Board members were independent of the company and its significant shareholders.
Group Executive Board (CEO and CFO as part of the Executive Board)	**Members**: The Group Executive Board consists of Sami Ensio (CEO), **Jyrki Vepsäläinen** (Innofactor Solutions), **Vesa Niinistö** (Innofactor Dynasty), **Marko Lybeck** (Innofactor Code), **Anni Wahlroos** (Chief People Officer and Deputy CEO), as well as **Martin Söderlind** until June 30, 2025, **Jørn Ellefsen** (Innofactor Platforms) until May 31 2026, and **Aki Rahunen** (Chief Financial Officer) from May 8, 2025 onwards. There were no employee representatives on the Executive Board. All members of the Executive Board participate in the management of the company as executives. **Gender diversity (year-end position):** 2024 20% women, 80% men 2025 14% women, 86% men **Responsibilities:** • Assesses the sustainability reporting framework and data points and presents the report to the Board of Directors for approval. • Determines the resources available for sustainable development. • Reviews the sustainability strategy and presents it to the Board of Directors for approval. • Prepares annual sustainability targets and presents them to the Board of Directors for approval as part of the company's business objectives. The Executive Board monitors progress towards the targets. • The Chief Financial Officer is responsible for annual sustainability reporting. • Ensures the development of sustainability-related competencies

Sustainability Steering Group Consists of representatives from Innofactor functions relevant to the identified sustainability themes and from process owners.	**Members:** In 2025, the sustainability steering group consisted on average of eight members representing the following support functions: HR, Communications, Quality, Legal and Finance. The group included five employees and two members of Group management who participate in the company's executive management. **Gender diversity:** At the end of 2025, 57% of the members of the sustainability steering group were women (2024: 57%) and 43% were men (2024: 43%). **Responsibilities:** • Continuous assessment of sustainability-related impacts, risks, opportunities and materiality. • Regular engagement with stakeholders. • Each representative is responsible for planning and implementing sustainability-related actions and targets within their area of responsibility. • The sustainability steering group prepares sustainability targets and, where necessary, presents them to the Group Executive Board for consideration.
Sustainability Committee	• A voluntary committee consisting of Innofactor employees. • Implements actions related to sustainability targets and proposes additional measures. • In 2025, the sustainability committee did not meet during the year.

In 2025, the Board of Directors included members who have familiarized themselves with sustainability matters relevant to Innofactor's business and operating environment. The Board of Directors does not possess specific sustainability-related expertise or educational backgrounds. In its work, the Board relies on the expertise of the Group Executive Board, the sustainability steering group and, where necessary, external experts. The Board has extensive expertise in the IT business, the impacts of technological transformation and their integration into business operations, as well as trends in the IT sector across Innofactor's Nordic markets.

The members of Innofactor's Executive Board represent all of the company's business areas. The Chief People Officer, who is a member of the Group Executive Board, has extensive expertise in sustainability matters related to social responsibility, and particularly Innofactor's own workforce.

The sustainability expertise of the sustainability steering group and the wider organization regarding material impacts, risks and opportunities is available to the Board of Directors and the Group Executive Board. Members of the sustainability steering group have been selected based on the identified material sustainability themes, and each member has relevant educational and professional experience within 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 sustainability-related impacts, risks and opportunities 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 review by the Board of Directors and the Executive Board. During 2024 and 2025, the assessment included the following sustainability-related risks:

- Availability of competent personnel
- Employee turnover
- Risks related to data protection and information security
- Risks related to legal compliance (such as risks arising from corruption and anti-competitive conduct) 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 planned corrective actions if the threshold defined for a 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, Innofactor further developed its environmental governance as part of its governance and risk management processes. During 2025, the company established an environmental management system in accordance with the ISO 14001 standard. The implementation of the environmental management system supports systematic identification, monitoring and reporting of environmental impacts, risks and opportunities. The environmental management system was certified in December 2025. The certification was granted by Kiwa Sertifiointi Oy.

Throughout the year, the sustainability steering group regularly addressed the matters described in section *SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model*. In addition, as part of the Board's regular activities, the Board of Directors was informed of, among other things, employee satisfaction metrics and the status of information security and data protection. 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 section *SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model*, while the responsibilities of the governance bodies are described above in section *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. The key elements of the incentive scheme for all employees are growth and profitability, and for customer-facing experts, the amount of customer work performed is also included as a criterion.

Regarding management, sustainability-related performance is linked to the bonus scheme through customer satisfaction and employee satisfaction. If either employee satisfaction or customer satisfaction declines compared to the previous measurement period or remains below the target level, management incentives are reduced by 10 per cent for each respective variable. The management incentive scheme does not include climate-related targets, as such targets have not, to date, been considered appropriate given the nature of the company's operations.

GOV-4 Statement on Due Diligence

Innofactor's operations are managed through predefined core processes and standards. Innofactor's quality management system defines the company's operating model and is divided into eight documented business processes and eight support service processes. Among the support service processes, those relating to risk management, legal matters and financial reporting, and among the business processes relating to personnel management and resource allocation, define the most important sustainability-related matters and procedures.

Innofactor does not have a separate due diligence process concerning sustainability matters. Instead, sustainability is integrated into each process that is material to a sustainability theme in accordance with the company's strategic priorities (for example, employee wellbeing within the HR process). Compliance with and implementation of the processes are 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 section *IRO-1 Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities*, and the same procedures are applied to risks related to sustainability reporting. Sustainability reporting forms part of each applicable process (such as HR or environmental management), and the reporting process may be audited internally as part of Innofactor's quality management system audits. Beginning in 2025, Innofactor publishes its sustainability report on a voluntary basis, and the report for 2025 has not been audited or assured.

During the 2025 reporting period, Innofactor integrated environmental risks into its sustainability-related risk management through the implementation of an environmental management system in accordance with the ISO 14001 standard. The environmental management system supports the systematic identification, assessment, monitoring and reporting of environmental risks as part of the company's overall risk management and internal control framework.

Risks related to sustainability reporting are monitored as part of the company's regular risk management process. Regarding sustainability reporting, the sustainability steering group has identified personnel turnover among individuals responsible for reporting, the availability of resources, and access to reliable value chain data once the transition period ends as key risks in the short and medium term. However, these risks have not been considered material at this stage.

SBM-1 Strategy, Business Model and Value Chain

Innofactor carried out a business strategy renewal during the reporting period. Operations under the new strategy and organizational structure commenced on January 1, 2025. From the perspective of sustainability reporting and the completed double materiality assessment, the new strategy did not include changes that would have a significant impact on Innofactor's business model, value chain, material sustainability themes or the 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 organizations, and approximately 1,000 organizations in the Nordic countries use Innofactor's solutions. Innofactor does not disaggregate its net sales by industry, but has identified technology and telecommunications, industry and manufacturing, and health and wellbeing as the most relevant ESRS sector groups for its operations.

The number of employees by country of operation is reported in section *S1-6 Characteristics of the Undertaking's Employees*.

As described in greater detail in section *SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model*, Innofactor has identified an opportunity to influence sustainability-related topics through its products and services together with its customers.

Following the implementation of the ISO 14001 environmental management system during 2025, the company has defined environmental objectives, metrics, risks and opportunities. In relation to the identified opportunities, Innofactor has committed to the targets of the Science Based Targets initiative (SBTi). However, the company has not yet established metrics to monitor sustainability benefits generated through customer solutions.

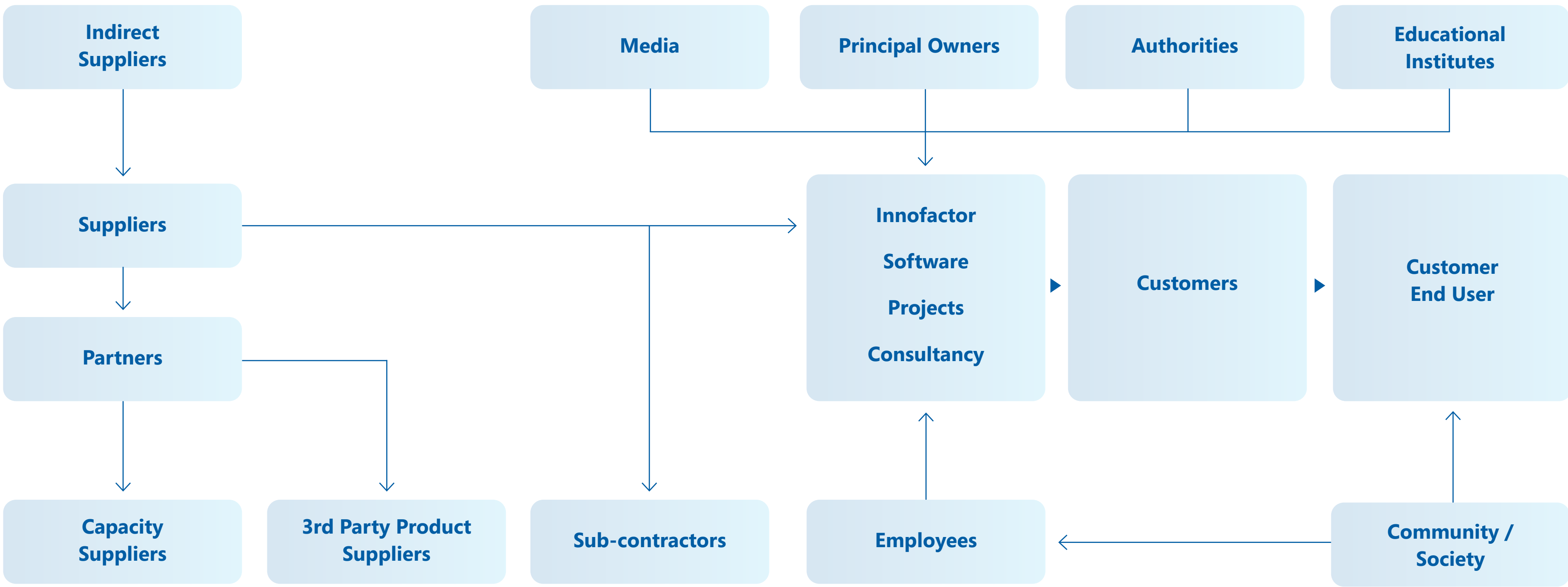


Figure: Innofactor's business value chain

Both Innofactor's strategy during the reporting period and its new strategy focus on solutions implemented on and utilizing Microsoft platforms. Innofactor focuses on cloud solutions, digitalization and AI-driven solutions. As a system integrator and software development company, Innofactor's business model and growth are fundamentally enabled by a highly skilled workforce with the ability to continuously develop its competencies.

Innofactor provides planning services, delivery projects, implementation support and maintenance services for business-critical IT solutions and develops its own software and services. Consequently, the key participants in Innofactor's value chain consist of its own personnel, technology partners, IT equipment suppliers and the end users of Innofactor's solutions, including customers, customers' employees, customers' customers and other stakeholders.

Innofactor's most important production input is its own personnel and, where necessary, subcontracting chains. Policies relating to Innofactor's own workforce are described in the section *ESRS S1 – Own Workforce below*.

SBM-2 Interests and Views of Stakeholders

Key stakeholders	Rationale	Engagement
Customers	Innofactor's success is linked to the success of its customers. Therefore, our objective is to help customers further develop their businesses.	Through ongoing customer relationship management, for example in the form of steering groups and follow-up meetings. A regular customer satisfaction survey is also conducted.
Personnel	Innofactor's success depends largely on its personnel, their commitment, competence and performance.	Described in section *S1-2 Processes for Engaging with Own Workers and Workers' Representatives About Impacts*.
Partners and Subcontractors	The availability of partners and subcontractors, and the success of cooperation with them, affect how well Innofactor can help its customers succeed.	As part of normal partner and subcontractor relationship management, depending on the nature of the delivery.
Principal Owners	Principal owners have a direct impact on the company's value and hold a view of the financial risks and opportunities related to Innofactor's operations.	Principal owners are actively involved in the company through Board work and executive management. Any reporting requirements they may have also influence operations.

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

The key stakeholders participated in the stakeholder survey conducted in 2023, the results of which were considered when identifying material sustainability themes and defining the priorities of Innofactor's sustainability strategy. The sustainability steering group continuously assesses which stakeholders should be considered key stakeholders and whether there is a need to conduct additional stakeholder surveys, considering the nature of the business and the identified material sustainability themes.

During 2025, Innofactor completed its delisting process, and as a result principal owners replaced investors and analysts as a key stakeholder group. In addition, the views of key stakeholders on sustainability-related themes are monitored as part of normal business operations, for example through customer and employee feedback. This feedback is also taken into account in the planning of the company's strategy and business activities. The new business strategy and organizational structure that entered into force on January 1, 2025, are expected to serve both Innofactor's customers and personnel even better. The strategy reform is not expected to have a material impact on key stakeholders or their views of Innofactor. Innofactor regularly assesses the need for new stakeholder surveys, and no need for such a survey was identified during the reporting period. Feedback received from stakeholders is also communicated to Group management and the Board of Directors as part of normal Executive Board and Board activities and 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.

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

Sustainability theme	Negative impacts	Positive impacts	Risks	Opportunities
Environment and Climate Change Estimated time horizon of impacts: medium-term and long-term.	GHG emissions generated by Innofactor's own operations and supply chain contribute to climate change. Climate change mitigation measures may result in additional costs, although Innofactor has not yet estimated their magnitude in greater detail.	Innofactor has the opportunity to support the achievement of customers' greenhouse gas emission reduction targets and to promote digitalization through the solutions and services it provides.	Through its value chain, climate change may affect the availability of IT equipment and the cost of purchased services if adaptation measures implemented by partners to mitigate climate change lead to increased costs (transition risk).	Innofactor has the opportunity to contribute positively to the environment by promoting the adoption of digital and energy-efficient solutions together with its customers and by favoring partnerships that support sustainability objectives in its own operations. Digital solutions related to sustainability themes, such as sustainability data management, may also create new business opportunities for Innofactor.

Sustainability theme	Negative impacts	Positive impacts	Risks	Opportunities
Own Workforce Covers the entire workforce. Estimated time horizon of impacts: short-term and medium-term.	Highly competent and motivated employees are central to Innofactor's business model. However, Innofactor's operations may have negative impacts particularly in relation to: • Workload and work-life balance • Equality and fair treatment of employees • Working conditions and employment terms, including adequate remuneration and effective management Challenges relating to these factors, or how employees perceive Innofactor as an employer, have a direct impact on the success of Innofactor's business and strategy.	Innofactor can contribute to positive impacts through: • Developing competencies through training • Promoting equality in recruitment and internal decision-making • Enhancing wellbeing at work by monitoring working hours and providing meaningful work tasks.	• Availability of skilled professionals • Employee turnover.	Increasing the number of employees supports economic growth. Revenue growth and competence development enable expansion of the customer base, long-term customer relationships and high-quality project deliveries. A responsible employer brand supports successful recruitment, strengthens Innofactor's attractiveness to IT professionals and enable workforce growth. Ensuring equal treatment also supports the recruitment of top talent.
Workers in the Value Chain Example: Employees of subcontractors.	Through business relationships, Innofactor may indirectly affect workers in the value chain in a similar manner to its own employees. The most significant impacts relate to working conditions and respect for human rights within the value chain.	Opportunity to promote similar positive impacts as those relating to Innofactor's own workforce.	Risks related to working conditions, such as compliance with labour legislation and human rights requirements among subcontractors, as well as potential reputational damage arising from these issues. The materiality of these risks is largely influenced by the nature and geographical location of value chain participants.	Partners and customers may increasingly use sustainability criteria in their selection processes or incorporate sustainability requirements into their operations. Ensuring the sustainability performance of partners may also become a competitive advantage.

Sustainability theme	Negative impacts	Positive impacts	Risks	Opportunities
Business Conduct (Compliance) Estimated time horizon of impacts: medium-term and long-term.	Transparent business conduct based on high ethical standards forms the foundation of Innofactor's operations. Innofactor's business conduct practices affect its ability to promote an open culture and prevent bribery, corruption and other forms of misconduct. If Innofactor were not to promote an open corporate culture, this could create an environment in which employees would be less likely to raise concerns regarding suspected misconduct. Potential instances of bribery or violations of competition law may also cause harm to Innofactor's business, its customers and society more broadly.	Innofactor can contribute to compliance with laws and regulations and the realization of its values through its own operations and business relationships within the value chain. Appropriate practices, prompt investigation of reported incidents, and the promotion of an ethical and sustainable corporate culture can be considered to have a positive impact on procurement processes. These actions may also make the company a more attractive supplier to private-sector customers.	The material risks related to business conduct primarily concern the consequences and reputational damage arising from non-compliance with legislation. Increasing regulatory requirements also create financial risk to the extent that the resulting costs increase faster than Innofactor's ability to incorporate those costs into the pricing of its services. A significant proportion of Innofactor's customer base consists of public procurement entities. Consequently, unethical conduct, such as violations of competition rules, may result in exclusion from procurement processes.	Reliable operations and adherence to high ethical standards can make Innofactor a more attractive employer and business partner for customers. The growing adoption of digital reporting solutions and the increasing number of organizations utilizing management systems create new business opportunities for Innofactor.
Data Security and Data Protection	Depending on the nature of the delivery, Innofactor has a material impact on how information security and personal data protection are implemented in the solutions and services it delivers. Data security and data protection failures may result in significant adverse impacts on Innofactor's operations, its customers and its personnel.	Through its own operations, Innofactor can promote the implementation of information security and data protection in its solutions. Effective management of these themes and demonstrating this capability to customers increases trust, protects confidential information and personal data belonging to both customers and Innofactor, and reduces risks associated with data breaches.	Innofactor has identified risks related to information security and data protection, including unauthorized access compromising information, leakage of insider information or Innofactor's trade secrets, compromise of personal data, unauthorized transfers of funds, and large-scale denial-of-service or ransomware attacks. The realization of these risks may result in loss of revenue, reputational damage, claims for compensation and sanctions imposed by supervisory authorities.	The increasing importance of information security and data protection in society enables the provision of related digital solutions and may lead to increased demand for information security services.

The material impacts, risks and opportunities identified by Innofactor fall within the scope of the ESRS disclosure requirements, with the exception of information security and data protection. Information security and data protection are discussed separately in the section *Data Security and Data Protection*.

In the assessment of risks and opportunities, the time horizon applied to impacts generally corresponds to the length of the company's financial year. In environmental matters, the time horizon for risks may be considered medium-term or long-term. The company has not carried out a climate resilience analysis of its strategy and business model.

During the 2025 reporting period, Innofactor did not identify any material financial effects resulting from the realization of identified risks or material opportunities. Innofactor regularly assesses the value of certain significant assets through separate impairment testing. Potential financial impacts arising from impairment can be managed through internal Group arrangements.

Material risks, opportunities and impacts are reported for the second time in 2025. The company's risk analysis takes account of the company's resilience and its ability to address material impacts and risks by defining threshold values for identified risk factors. If these thresholds are exceeded, management is required to determine corrective measures. Any materialized risks and related actions are submitted to the 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 annually, material sustainability-related impacts, risks and opportunities arising from the company's operations. The assessment includes consideration of, among other things:

- whether any new risks, opportunities or impacts have been identified;
- whether new sustainability-related risks should be proposed for inclusion in the risk register;
- whether identified risks also reveal opportunities for business development;
- assessing the risks and opportunities arising from actual and potential impacts;
- whether there is a need to conduct a new stakeholder survey; and
- whether there is a need to consult external experts to validate the assessments made.

As part of the assessment, a climate resilience analysis of the company's strategy and business model is carried out where necessary if material climate change-related risks have been identified. The process also monitors the climate impacts of Innofactor's operations, including greenhouse gas emissions, and ensures that the science-based emission reduction targets established during 2025 are aligned with the objective of limiting global warming to 1.5°C. Innofactor has not identified any material physical climate-related risks to date. Climate-related transition risks are discussed in section *SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model*. Scenario analysis has not been used in the assessment of climate-related risks.

Innofactor's operations are primarily based on IT services delivered in an office environment, which means that the company's direct environmental impacts are limited. Although climate change-related issues were identified in Innofactor's double materiality assessment, the company has not considered pollution, water resources, marine resources, resource use, circular economy, or biodiversity to be material topics. Consequently, Innofactor has not assessed its locations, operations, assets or value chain in relation to risks, opportunities and dependencies associated with these matters. Nor has Innofactor considered it necessary to implement specific biodiversity-related measures or conduct separate consultations. Innofactor continuously monitors these topics as part of its sustainability assessment process and updates its materiality assessment where necessary.

Innofactor applies a risk management process within the scope of its ISO 14001, ISO 9001, ISO 27001, AQAP 2110 and ISO 13485 certifications. The process covers all of Innofactor's functions and is not focused on any specific functions, business relationships or geographic areas. The process considers impacts to which the company is connected through its own operations or business relationships. Feedback received from stakeholders is also used as a basis for assessment.

The ISO 14001 environmental management system guides the identification, assessment and management of environmental impacts as part of the company's overall risk management framework. Environmental risks, such as those related to energy consumption, supply chains and indirect environmental impacts arising from service delivery, are included in risk registers and management system assessment practices where applicable. Environmental management is continuously improved in accordance with the principles of continual improvement embedded in the certified environmental management system.

For each risk or opportunity identified in relation to Innofactor's core business processes, the company defines a category, likelihood, financial impact, owner and measures to manage risks or realize opportunities. Risks may be prioritized according to their potential impacts. Innofactor does not prioritize sustainability-related risks separately but applies the same risk management process to all risks. In addition, as part of its double materiality assessment, Innofactor has assessed the likelihood, scale and nature of sustainability-related impacts at a general level.

Innofactor regularly reviews its Group-level risk register and the need for updates, taking into account both business-related risks and risks arising from its own operations. Risk realization is assessed, among other means, through internal audits that form part of the company's management system, and the results of these audits may be used in risk assessments. The Board of Directors uses the risk assessment as part of its decision-making process. The risk assessment process has not changed compared to the previous reporting period. Risks, opportunities and impacts may also be identified through Innofactor's business development processes.

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

A list of the disclosure requirements reported in this Sustainability Report is included in the table of contents. A list of data points derived from other EU legislation is presented in the section IRO-2 List of Datapoints Based on Other EU Legislation.

ESRS E1 – Climate Change

Of the disclosure requirements under ESRS E1, Disclosure Requirement E1-8 Internal Carbon Pricing has been assessed as non-material based on Innofactor's double materiality assessment and business context, as Innofactor does not apply internal carbon pricing mechanisms.

EU Taxonomy Disclosures

Innofactor reviewed its economic activities during the reporting period against the criteria established by the European Union. Innofactor did not identify any activities aligned with the environmental objectives of the EU Taxonomy. Consequently, the share of Innofactor's net sales and capital expenditure that is taxonomy-aligned, is 0 per cent.

Share of taxonomy-eligible activities

KPI	EUR thousand	Taxonomy-eligible, %	Non-taxonomy-eligible, %
Net sales	67,580	0.0	100.0
Capital expenditure*	472	0.0	100.0
Operating expenditure	7,424	0.0	100.0

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

E1-1 Transition Plan for Climate Change Mitigation

Contrary to the objective stated in the 2024 Sustainability Report, a transition plan was not prepared during 2025. Innofactor has initiated work on its climate change mitigation transition plan and intends to report on the plan in the Sustainability Report covering the year 2026.

E1-2 Policies Related to Climate Change Mitigation and Adaptation

Innofactor adheres to its environmental policy and recognizes the significance of climate change mitigation as part of its sustainability strategy. Innofactor's environmental policy was updated in 2025 as part of the continuous development of its environmental management.

Innofactor's environmental policy guides the measures aimed at responding to the challenges caused by climate change and reducing the environmental burden caused by the company's operations. The environmental policy defines the principles that are always applied both 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 preventive actions, and proactively responding to the changing operating environment.

Innofactor's environmental management is guided by an environmental management system in accordance with the ISO 14001 standard, as well as Innofactor's science-based near-term emissions reduction targets (SBTi) for limiting global warming to 1.5 degrees Celsius.

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

Some of Innofactor's premises are within the scope of renewable energy, and the share of renewable energy consumption of total energy consumption is described in section *E1-5 Energy Consumption and Mix*.

Taxonomy-Eligible Net Sales

				Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")										
Economic activities (1)	Code (2)	Net Sales (3) MEUR	Proportion of Net Sales (4) %	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	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
A. Taxonomy-eligible activities																				
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 environme-ntally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%																	
Net sales of Taxonomy-eligible activities (A.1 + A.2)		**0**	**0%**																	
B. Taxonomy-non-eligible activities																				
Net sales of Taxonomy-non-eligible activities (B)		**67.6**	**100%**																	
Total (A + B)		**67.6**	**100%**																	

Operating Expenses (OpEx)

				Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")										
Economic activities (1)	Code (2)	OpEx (3) MEUR	Proportion of OpEx (4) %	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	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
A. Taxonomy-eligible activities																				
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%																	
OpEx of Taxonomy-eligible activities (A.1 + A.2)		**0**	**0%**																	
B. Taxonomy-non-eligible activities																				
OpEx of Taxonomy-non-eligible activities (B)		**2.4**	**100%**																	
Total (A + B)		**2.4**	**100%**																	

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)

				Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")										
Economic activities (1)	Code (2)	CapEx (3) MEUR	Proportion of CapEx (4) %	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	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
A. Taxonomy-eligible activities																				
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%																	
CapEx of Taxonomy-eligible activities (A.1 + A.2)		**0**	**0%**																	
B. Taxonomy-non-eligible activities																				
CapEx of Taxonomy-non-eligible activities (B)		**0.4**	**100%**																	
Total (A + B)		**0.4**	**100%**																	

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 (0.4 million euros) include activations of employee's laptops and other equipment.

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 Chief Financial Officer and the Chief People Officer.

Innofactor does not have policies or principles aimed at climate change adaptation.

E1-3 Actions and Resources Related to Climate Change Policies

The key actions related to climate change mitigation undertaken by Innofactor during 2025, and the resources allocated to their implementation, were as follows:

- The establishment of Innofactor's near-term emissions reduction targets and the approval of those targets by the Science Based Targets initiative (SBTi) in November 2025.
- The establishment of an environmental management system and the acquisition of ISO 14001 certification in December 2025.

The climate change mitigation actions planned for 2026 are:

- Further development and deployment of the environmental management system as part of the Group's management system.
- Systematic monitoring and reporting of emissions, energy consumption and recycling.
- Consideration of environmental criteria in travel and procurement practices.
- Development of employee competencies, including environmental training and Green Coding.
- Advancing the transition towards broader use of renewable energy and the achievement of SBTi targets.
- Preparation of a climate change mitigation transition plan. The transition plan will cover the entire Innofactor Group.

According to the assessment carried out to date, the actions implemented and planned to mitigate climate change have not required, and are not expected to require, significant capital expenditure or operating expenditure.

E1-4 Targets Related to Climate Change Mitigation and Adaptation

Science Based Targets initiative (SBTi) is an international initiative that promotes climate action in the private sector by supporting companies in setting science-based targets for reducing greenhouse gas emissions. Innofactor joined the initiative in March 2025.

Innofactor began work on defining its own emissions reduction targets during 2024, and the targets were approved by SBTi in November 2025. Innofactor's near-term emissions reduction targets are as follows:

- Innofactor commits to reduce absolute scope 1 and 2 GHG emissions 63.64% by 2030 from a 2023 base year.*
- Innofactor commits to reduce absolute scope 3 GHG emissions 25.0% by 2030 from a 2024 base year.

* The target boundary includes land-related emissions and removals from biogenic feedstocks.

The targets established under the Science Based Targets initiative ensure that Innofactor's emissions reductions are based on current, scientifically validated information and support the objective of the Paris Agreement to limit global warming to no more than 1.5°C.

E1-5 Energy Consumption and Energy Mix	2024	2025
Total energy consumption from fossil sources (MWh)	174.1	84.5
Share of fossil sources in total energy consumption (%)	9.1	4.5
Consumption of energy from nuclear sources (MWh)	22.1	46.3
Share of nuclear sources in total energy consumption (%)	1.2	2.5
Fuel consumption from renewable sources, including biomass (including bio-based industrial and municipal waste, biogas, renewable hydrogen, etc.) (MWh)	6.6	4.3
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	1,562.0	1,567.6
Consumption of self-generated renewable energy from non-fuel sources (MWh)	0.9	-
Total renewable energy consumption (MWh)	1,569.5	1,571.9
Share of renewable sources in total energy consumption (%)	81.8	84.2
Total energy consumption (MWh)	1,917.5	1,866.4

Energy Intensity Relative to Net Sales	2024	2025
Total energy consumption from activities in high climate impact sectors relative to net sales from those activities (MWh / EUR 1,000)	0.025	0.028

Innofactor's energy intensity is calculated by dividing total energy consumption by the Group's net sales. The calculation of energy intensity is based on the Group's net sales reported in the consolidated financial statements.

E1-6 Gross Scope 1, Scope 2, Scope 3 and Total GHG Emissions

Innofactor's greenhouse gas emissions calculation is based on the principles, requirements and guidelines defined in the GHG Protocol Standard. The emissions calculation has been carried out by an external expert based on data provided by Innofactor, and the results are presented as carbon dioxide equivalents (CO2e), which describe the standardized climate impact of different greenhouse gases.

The operational boundary of the calculation is based on emissions arising from activities under the company's control, and the value chain emissions included in the calculation are those that are most relevant to the company's operations. Scope 1 emissions included emissions from fuels used by vehicles leased by the company and emissions from the consumption of liquefied petroleum gas at one office location. Scope 2 emissions included emissions arising from the use of electricity, district heating and district cooling at the company's office locations. From 2025 onwards, the Scope 3 emissions calculation included all purchased goods and services, waste generated in operations (waste by fraction and wastewater), business travel (car travel, flights and hotel nights), and emissions arising from employee commuting.

To ensure comparability, the calculations for previous years have been expanded to correspond to the current calculation model. In particular, the 2023 calculation has been expanded to include new Scope 3 emissions categories, and these changes have been reflected in the comparative figures.

For IT procurement, phones and computers had previously been included, and from 2024 onwards purchased external displays were also included in the calculation. For waste generated at office locations, only wastewater had been included in previous years, and from 2024 onwards the calculation has also included waste by fraction. The calculation covered 13 Innofactor Group locations: Espoo, Kuopio, Lappeenranta, Tampere, Turku, Kajaani, Oulu and Jyväskylä in Finland; Stockholm in Sweden; Oslo, Bergen and Trondheim in Norway; and Copenhagen in Denmark. The Bergen and Trondheim offices were closed during the fourth quarter of 2025.

Emissions from employee commuting have been calculated based on a commuting survey sent to all employees in February 2025. The survey response rate was 34 per cent of the total personnel. In 2023, emissions from employee commuting were estimated based on the results of Traficom's National Travel Survey.

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

Scope 1 GHG emissions	2022	2023	2024	**2025**
Gross Scope 1 GHG emissions (tCO2e)	11.4	9.4	9.7	6.7
Own energy production	-	-	0.1	0.1
Vehicle fuels	11.4	9.4	9.7	6.6
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0	0

Scope 2 GHG emissions	2022	2023	2024	**2025**
Gross location-based Scope 2 GHG emissions (tCO2e)	-	183.9	200.7	151.6
Gross market-based Scope 2 GHG emissions (tCO2e)	184.3	187.8	80.5	36.8
Heating and cooling (location-based)	-	157.0	173.5	129.3
Heating and cooling (market-based)	174.9	176.6	35.3	16.4
Electricity (location-based)	-	26.9	27.2	22.4
Electricity (market-based)	9.4	11.2	45.2	20.4

Significant Scope 3 GHG emissions	2022	2023	2024	**2025**
Total gross indirect Scope 3 GHG emissions (tCO2e)	187.6	1,105.7	1,265.2	924.5
1 Purchased goods and services	43.2	550.7	812.9	491.7
IT procurement	43.2	22.3	38.5	32.5
Cloud computing and data center services	-	6.1	5.9	2.9
Other purchased goods and services		522.3		456.3
2 Capital goods		20.1	13.5	8.5
3 Fuel- and energy-related indirect emissions		193.6	112.9	133.8
Purchased energy		189.0		129.6
Fuels		2.6		1.9
Distribution and transmission losses		2.0		2.3
4 Upstream logistics		0.002	0.003	0.003
5 Waste generated in operations	1.2	9.5	14.1	7.3

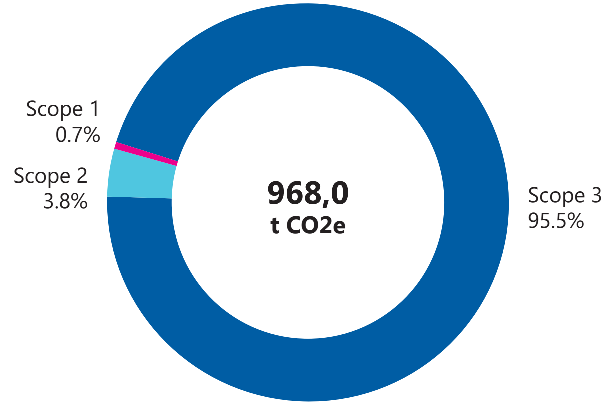
Waste	-	7.9	13.5	6.8
Wastewater	1.2	1.6	0.6	0.5
6 Business travel	143.2	166.3	155.5	139.8
Business travel by car	32.4	-	39.6	38.6
Flights	96.4	-	93.2	94.7
Hotel nights	14.4	-	22.6	5.2
Train travel		-		1.2
7 Employee commuting	-	165.6	156.3	143.5

Total GHG emissions	2022	2023	2024	**2025**
Total GHG emissions, location-based (tCO2e)	-	1,299.0	1,475.6	1 082.8
Total GHG emissions, market-based (tCO2e)	383.3	1,302.9	1,355.4	968.0

* In the reporting year 2024, the company's emissions calculation was expanded to cover the scope required by SBTi. These methodological changes were also updated for 2023 in connection with the 2025 reporting calculation.

GHG Intensity Relative to Net Sales	2024	**2025**
Total location-based GHG emissions relative to net sales (tCO2e / EUR million)	7.0	16.0
Total market-based GHG emissions relative to net sales (tCO2e / EUR million)	6.0	14.3

Innofactor's greenhouse gas emissions intensity is calculated by dividing total location-based or market-based greenhouse gas emissions by the Group's net sales. The Group's net sales reported in the consolidated financial statements have been used in the calculation of greenhouse gas emissions intensity.



The Innofactor Group's total location-based carbon footprint for 2025 was 1,082.8 tonnes of CO2 equivalent (tCO2e). The Group's total market-based carbon footprint for 2025 was 968.0 tonnes of CO2 equivalent (tCO2e).

Location-based total greenhouse gas emissions relative to net sales amounted to 16.0 tCO2e per EUR million of net sales, while market-based total greenhouse gas emissions relative to net sales amounted to 14.3 tCO2e per EUR million of net sales.

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	Consumption data from the office location; consumption allocated from the property's total consumption based on the floor area occupied by the company	Fairly accurate: secondary data; the emission source can only be measured indirectly or estimated computationally	Fuel Classification, Statistics Finland (2025)	Good: Average emission factor from general databases corresponding to the data source
Scope 1	Vehicle fuels	Consumption-based	Scaled on a cost basis from estimated 2024 consumption	Satisfactory: unverified data based on assumptions or scaling	Fuel Classification, Statistics Finland (2025)	Good: average emission factor from general databases corresponding to the data source
Scope 2	Electricity	Consumption-based (entire property), floor-area-based allocation	Consumption data by office location; consumption allocated from the property's total consumption based on the floor area occupied by the company	Fairly accurate: secondary data; the emission source can only be measured indirectly or estimated computationally	Supplier-specific factors and country-specific residual mixes (market-based), and national averages (location-based)	Good: average emission factor from general databases corresponding to the data source
		Estimate based on other company premises	Consumption for four office locations (Gothenburg, Copenhagen, Bergen and Trondheim) estimated using average consumption from other premises (kWh/employee)	Fairly accurate: secondary data; the emission source can only be measured indirectly or estimated computationally	Supplier-specific factors (market-based) and national averages (location-based)	Good: average emission factor from general databases corresponding to the data source
Scope 2	District heating and cooling	Consumption-based (entire property), floor-area-based allocation	Consumption data by office location; consumption allocated from the property's total consumption based on the floor area occupied by the company	Fairly accurate: secondary data; the emission source can only be measured indirectly or estimated computationally	Supplier-specific factors (market-based) and national averages (location-based)	Good: average emission factor from general databases corresponding to the data source
		Estimate based on other company premises	Consumption for four office locations (Gothenburg, Copenhagen, Bergen and Trondheim) estimated using average consumption from other premises (kWh/employee)	Fairly accurate: secondary data; the emission source can only be measured indirectly or estimated computationally	Supplier-specific factors (market-based) and national averages (location-based)	Good: average emission factor from general databases corresponding to the data source

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	Purchased goods and services	Procurement-based	Number of IT purchases	Good: verified data based on assumptions	Ademe (2022)	Good: average emission factor from general databases corresponding to the data source
			Cloud services	Excellent: verified measurement-based data	Supplier	Excellent: verified emission factor corresponding to the data source
		Spend-based	Services	Good: verified data based on assumptions	Exiobase 3.8.2 (2024)	Satisfactory: average emission factor from general databases that does not fully correspond to the data source
Scope 3, Category 2	Capital goods	Spend-based	Investment expenditure	Good: verified data based on assumptions	Exiobase 3.8.2 (2024)	Satisfactory: average emission factor from general databases that does not fully correspond to the data source
Scope 3, Category 3	Fuel- and energy-related emissions	Consumption-based	Fuel and energy consumption data	Good: verified data based on assumptions	Defra (Fuels, 2024), Statistics Finland, One Click LCA (Electricity and district heating, 2024)	Good: average emission factor from general databases corresponding to the data source
Scope 3, Category 4	Upstream transportation and distribution	Estimate	Transportation distances of procured equipment estimated	Good: verified data based on assumptions	Defra (2025)	Good: average emission factor from general databases corresponding to the data source
Scope 3, Category 5	Waste generated in operations	Quantity-based	2024 waste volumes scaled according to headcount; wastewater consumption estimated based on headcount	Good: verified data based on assumptions	Ecoinvent 3.11 (2025)	Good: average emission factor from general databases corresponding to the data source

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	Business travel by car, flights (distance estimated based on departure and destination), and hotel stays	Good: verified data based on assumptions	Traficom (car travel, 2024) and Defra (flights and hotel stays, 2025)	Good: average emission factor from general databases corresponding to the data source
Scope, Category 7	Employee commuting	Distance-based	Employee commuting survey conducted in 2025. Response rate 34%; results scaled to cover all personnel	Weak: estimated data	Defra (petrol, diesel, hybrid and electric vehicles and metro, 2025) and VTT (ethanol and gas vehicles, 2017)	Good: average emission factor from general databases corresponding to the data source

Value Chain Emission Sources Excluded from the Calculation

Emission Source	Reason for Exclusion
8 Upstream	No significant emission sources identified
9 Downstream transportation and distribution	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 Carbon Removals and Greenhouse Gas Mitigation Projects Financed Through Carbon Credits

Innofactor did not undertake any measures during the reporting period to enhance natural carbon sinks or apply technological solutions to remove greenhouse gases from the atmosphere in its own operations or in the upstream or downstream parts of its value chain.

Innofactor finances certified greenhouse gas mitigation projects through the purchase of carbon credits from projects located outside the company's value chain. In 2026, Innofactor purchased carbon credits corresponding to 512 tCO_2e, equivalent to its 2025 Scope 1 and Scope 2 greenhouse gas emissions. The carbon credits were allocated equally between the Brazil Rainforest – Russas Project and the Gambia SafeWater project. The decision to finance 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, and policies relating to its workforce are documented in the company's HR policy process description. In addition to local legislation, Innofactor is committed, where applicable, to the principles and practices of the International Labour Organization (ILO) and the United Nations relating to human rights. The Chief People Officer has operational responsibility for implementing and developing the HR policy and, more broadly, for ensuring that social responsibility relating to Innofactor's own workforce is taken into account in the company's operations.

Key performance indicators (KPIs) have been defined for personnel-related risks and are monitored regularly as part of HR and business processes. These metrics are monitored at the level of the entire workforce, by business unit and by country. The reported figures have been calculated in accordance with the requirements of the standard and are based, with regard to workforce data, primarily on information obtained from Innofactor's ERP system, employee satisfaction system and insurance provider.

A low hierarchy, close interaction and strong cooperation with employee representatives (such as employee representatives and occupational safety representatives) are essential elements of Innofactor's corporate culture. Innofactor has an occupational safety programme that focuses on relevant occupational safety topics, such as first-aid preparedness, ergonomics and emergency evacuation exercises. Innofactor places a strong emphasis on employee well-being, as the most significant work ability risks in expert work relate to employee resilience and coping.

In accordance with Innofactor's HR policy, the company has zero tolerance for discrimination, harassment and bullying. Employees commit to these principles as part of the onboarding process. HR intervenes in all cases of discrimination, harassment and bullying, which are investigated on a case-by-case basis. Innofactor has not identified any groups of employees that would be subject to impacts or risks based on their characteristics that differ from those affecting the rest of the workforce. Innofactor's culture encourages everyone to be themselves (*Be the Real You*) and is people-centric (*People First*).

Innofactor promotes equal treatment of job applicants throughout the recruitment process. For example, gender is not requested as part of the recruitment process. In line with its sustainability strategy, the company operates in an inclusive manner, and managers receive training on the topic. In accordance with Innofactor's employer value proposition, everyone can be themselves – *Be the Real You*.

S1-2 Processes for Engagement with Own Workers and Workers' Representatives About Impacts

Innofactor promotes an open discussion culture that encourages information sharing and feedback. Communication and information sharing are supported through internal communications, news updates and information sessions.

Group-wide business and personnel briefings, as well as business-specific information sessions, are held monthly to ensure that employees have as comprehensive an understanding as possible of the business situation and current developments. The Chief People Officer is a member of the Group Executive Board, which enables employees' voices to be represented throughout the organizational hierarchy.

Innofactor conducts a weekly employee satisfaction survey that enables all employees to provide anonymous feedback and maintain dialogue with their manager, business management and Human Resources.

Employee representative and occupational safety representative also act as channels through which employees can raise matters with the employer. Regarding employee representation, Innofactor always complies with applicable local legislation.

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

In accordance with Innofactor's HR policy, several channels are available for employees to provide feedback and raise concerns. Concerns may be raised directly with an employee's manager, Human Resources or employee representatives, and are handled in accordance with Innofactor's internal processes depending on the nature of the matter and the channel through which it is raised.

Concerns may also be raised anonymously through the company's internal whistleblowing channel or through the weekly employee satisfaction survey, both of which are accessible to all employees through their work tools. The results of the employee satisfaction survey are reviewed monthly during personnel information sessions. To ensure anonymity, the employee satisfaction survey is administered by a third party, and information describing the processing of survey data is available on the company intranet.

As part of the onboarding process, every employee provides a written acknowledgement of the company's zero-tolerance policy and their obligation to report any observed bullying, harassment or discrimination.

S1-4 Actions Taken on Material Impacts on Own Workforce and Approaches to Managing Material Risks and Opportunities Related to Own Workforce, and the Effectiveness of Those Actions

In accordance with its sustainability strategy, Innofactor puts people first in everything it does and supports the wellbeing and development of its employees. Innofactor promotes equality, diversity and inclusion. A healthy balance between work, personal wellbeing and leisure time is an important part of Innofactor's culture. This is supported through flexible working arrangements, comprehensive occupational healthcare services and good leadership.

Actions taken during the reporting period included, among other things, reduced working time arrangements, training provided for managers, an early support model, and close cooperation between occupational healthcare, managers and employees (tripartite cooperation). Through these measures, Innofactor aims, particularly in the short and medium term, to minimize employee turnover, promote employee wellbeing and take into account individual circumstances affecting employees' wellbeing and life situations. These actions are a key part of Innofactor's social responsibility policies. Innofactor has planned to continue implementing similar measures during the next reporting period.

All Innofactor offices are equipped with ergonomic workstations. Employees are entitled to take the breaks required during the working day. Employee benefits support wellbeing and resilience. In addition, Innofactor seeks continuous improvement in employee wellbeing and monitors progress through its weekly employee satisfaction survey. Each year, the company aims to further develop its practices and introduce new ways of working and employee benefits based on feedback collected from employees.

Impacts and actions that are important from the workforce perspective are monitored and developed within the HR function, which employed an average of six people in 2025. In addition, within Innofactor's organizational model, People Managers play a key role in matters relating to workforce impacts. They act as full-time managers within business units. In 2025, Innofactor had ten People Managers. These functions are responsible for preventing negative impacts on the workforce and promoting positive impacts.

S1-5 Targets Related to Managing Material Negative Impacts, Advancing Positive Impacts, and Managing Material Risks and Opportunities

Innofactor monitors employee satisfaction and employee experience (weekly pulse survey), sickness absence, employee turnover and competence development. Employee satisfaction remained at a good level in 2025, reaching 7.3/10 (2024: 7.5/10). Innofactor continuously strives to be the best possible workplace for its employees. Accordingly, the target is to maintain employee satisfaction at a level above 7.5/10.

Innofactor monitors sickness absence as a percentage of total working time. Sick leave levels are typical for the industry. In 2025, the sickness absence rate was 3.0% (2024: 2.8%), and the objective is to keep sickness absence at a low level (below 2.5%).

No occupational accidents occurred at Innofactor during 2025, and consequently no absence, permanent harm or injuries resulted from occupational accidents.

Employee turnover remained at a moderate level of 13.6% in 2025 (2024: 11.5%), and the objective is to maintain turnover at a reasonable level in the future. In 2025, the average length of employment among Innofactor's active workforce was 7 years (2024: 6 years).

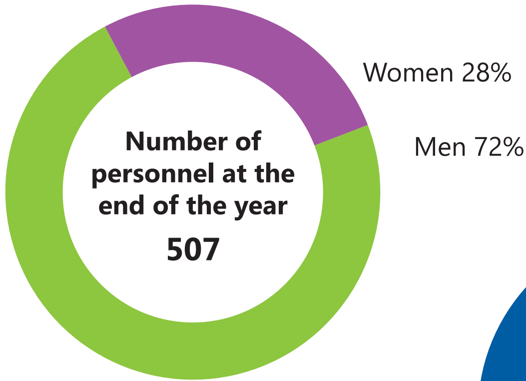
With regard to competence development, Innofactor does not measure hours spent studying, as a significant portion of learning takes place through daily work and demanding customer projects. Instead, the measure used for learning and development is the number of certifications held by employees engaged in customer work (such as Microsoft certifications, ITIL, PRINCE and SCRUM certifications).

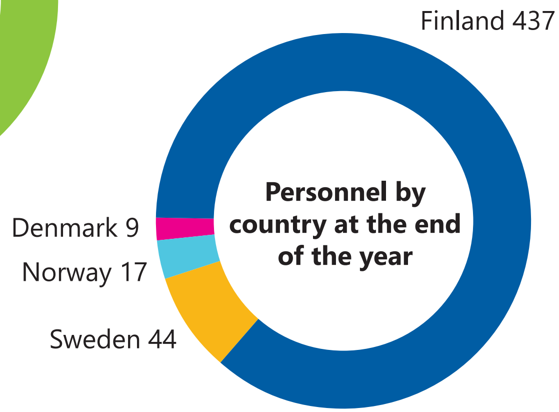
In 2025, Innofactor employees held a total of 857 certifications relevant to their work. Innofactor has not set specific numerical targets for certifications; instead, certification requirements are driven by Microsoft's requirements and customer needs.

The targets described above support the objectives of both the HR process and the business and apply to the entire workforce. Targets are set annually, and progress against the related metrics is continuously monitored and evaluated. The Chief People Officer participates in target setting together with business management. Targets and actual results are reviewed openly with employees during personnel information sessions. Feedback received during the previous year from employees, employee representatives and managers is taken into account when setting targets.

S1-6 Characteristics of the Undertaking's Employees

Innofactor monitors the number of active employees. Employees who are absent for more than three months are not included in the active headcount. Employee turnover was 13.6% in 2025 (2024: 11.5%), and a total of 48 employees left Innofactor during 2025. The figures below relating to employees are reported as at the last day of 2025.

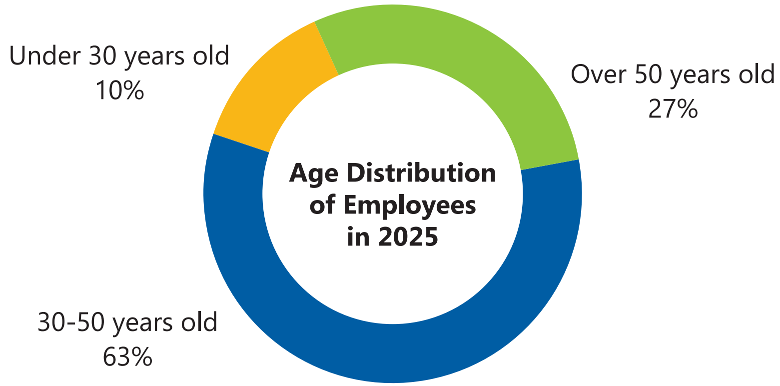




	Employees	Men	Women
Total workforce	507	72%	28%
Finland	437	73%	27%
Sweden	44	70%	30%
Norway	17	65%	35%
Denmark	9	78%	22%
Permanent employees	499	72%	28%
Fixed-term employees	3	0%	100%
Hourly-paid employees	5	80%	20%

S1-9 Diversity Metrics

The gender distribution of the Executive Board is presented above in section *GOV-1 The Role of the Administrative, Management and Supervisory Bodies*.



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

During 2025, a total of 108 employees of subcontracting companies worked for Innofactor. Age and gender distributions are not reported for subcontractors. A significant proportion of subcontracting agreements are structured as flexible arrangements (hourly-based) according to customer needs.

S1-8 Collective Bargaining Coverage and Social Dialogue

In Finland, Innofactor employees are covered by Innofactor's company-specific collective agreement, excluding management (96% coverage). A single collective agreement is applied to all employees in Finland. Swedish employees are covered by a local collective agreement (100% coverage). Employees in Norway and Denmark are not covered by collective agreements. In total, 97% of Innofactor's workforce is covered by a collective agreement.

S1-10 Adequate Wages

Innofactor pays all employees at least the minimum wage required by the legislation of each country in which it operates, as well as the minimum wage required under applicable collective agreements.

S1-11 Social Protection

Innofactor employees are located within the European Economic Area and are covered by national social security legislation. The company has employees in Finland, Sweden, Norway and Denmark.

S1-12 Persons with Disabilities

Innofactor does not collect or process information on persons with disabilities for reporting purposes and does not consider such collection or processing to meet the necessity requirement set out in legislation governing privacy in working life.

S1-13 Training and Skills Development Metrics

At Innofactor, learning takes place as part of daily work, combined with self-study, training and certifications. In addition, Innofactor invests in high-quality onboarding. In accordance with the annual management cycle, managers conduct quarterly feedback discussions in which objectives and performance are reviewed.

As part of the employee satisfaction survey, employees are also asked about their opportunities for personal development through the following questions: "Do you feel that you are able to learn and develop your skills?" and "Do you feel that you receive sufficient training and development opportunities to perform your work successfully?" Both indicators remained at a good level of 7/10 in 2025 (2024: 7/10).

S1-14 Health and Safety Metrics

Innofactor complies with local legislation and collective agreements regarding occupational health and safety arrangements. Healthcare services are organized in accordance with local practices, and all employees are covered by these arrangements. As Innofactor's work primarily consists of office-based work, occupational accidents mainly occur during commuting.

- The number of fatalities resulting from work-related injuries or occupational health issues in 2025 was 0 (2024: 0).
- The number of occupational accidents in 2025 was 0 (2024: 1). The number of commuting accidents in 2025 was 2 (2024: 6).
- The number of occupational diseases in 2025 was 0 (2024: 0).
- Lost working days due to fatal occupational accidents, injuries or occupational health issues in 2025 amounted to 0 (2024: 0).
- The work-related injury rate for 2025 was 0 (2024: 1).

S1-15 Work-Life Balance Metrics

All Innofactor employees are entitled to family-related leave in accordance with social policy requirements and/or applicable collective agreements. Employees working under executive contracts are also entitled to family leave in accordance with applicable collective agreements.

The proportion of employees who took family leave during 2025 was 8.8% of the total workforce (2024: 9.7%), of whom 22% were women (2024: 32%) and 78% were men (2024: 68%).

In addition, under Innofactor's company-specific collective agreement, the first 36 days of the parental leave period following pregnancy leave are paid leave, and this benefit is provided equally to non-birthing parents.

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

Innofactor's remuneration policy is based on equitable treatment to the greatest extent possible. Compensation is determined based on role, job complexity, experience and competence. Comparisons between Nordic countries are challenging due to differences in currencies and cost levels; therefore, only figures relating to employees in Finland are reported.

- Gender pay gap, 2025: 6% (2024: 6%)
- Annual total compensation ratio in Finland, 2025: 37% (2024: 38%)

S1-17 Incidents, Complaints and Severe Human Rights Impacts

Innofactor has a zero-tolerance policy towards bullying, harassment and discrimination. During 2025, no incidents of discrimination (including harassment) or human rights violations were reported at Innofactor. Furthermore, Innofactor did not incur any fines, penalties or compensation payments relating to such incidents or situations.

ESRS G1 - Business Conduct

Disclosure Requirement G1-6 Payment Practices has been assessed as non-material on the basis of Innofactor's double materiality assessment.

G1-1 Policies Related to Business Conduct and Corporate Culture

The foundation of all Innofactor's operations is transparent business conduct based on high ethical standards. Innofactor's business conduct policies and guidelines are available to employees through the company's quality management system. Potential violations may be identified as part of internal quality audits.

Innofactor applies the following policies and measures to implement its business conduct principles:

- **Code of Conduct** defines the general principles and guidelines that all employees are required to follow. A Code of Conduct test is mandatory for all new employees upon joining the company. No separate Code of Conduct training sessions were organized during 2025.
- **Anti-Bribery and Anti-Corruption Policy.** With regard to bribery and corruption risks, Innofactor has assessed that employees responsible for the company's sales activities constitute the primary risk group.
- **Internal whistleblowing channel** for reporting any suspected misconduct or unethical behavior, including anonymously. Reports are handled by independent individuals and always in accordance with applicable local whistleblower protection legislation. Reports are generally reviewed without delay by Innofactor's Group Legal Counsel, and the channel is available through the company intranet. Where necessary, an independent committee may be established, and external experts may be engaged to support the investigation.

Employees' opportunities to raise concerns are also described above in section *S1-3 Processes to Remediate Negative Impacts and Channels for Own Workers to Raise Concerns*.

G1–2 Relationships with Suppliers

Innofactor has established processes relating to partners and subcontractors that set requirements for its suppliers. Innofactor does not maintain separate payment policies concerning small and medium-sized enterprises but instead complies with the payment terms agreed in each contract.

When initiating any procurement or partnership arrangement, the Innofactor representative approving the procurement is responsible for ensuring that the selected partner has committed to Innofactor's Code of Conduct or that it has otherwise been verified that the partner meets the ethical business conduct standards required by Innofactor (for example, through the partner's equivalent policies and guidelines).

Innofactor has not identified its subcontracting chains or technology partners as presenting particularly high sustainability-related risks. However, the company continuously evaluates this assessment and responds where necessary to any shortcomings or risks identified in partner operations.

G1–3 Prevention and Detection of Corruption and Bribery

Innofactor has a zero-tolerance approach to bribery and corruption. The company has a Board-approved anti-bribery and anti-corruption policy that supplements its Code of Conduct. The topic is also covered in Code of Conduct training provided to all employees and as part of onboarding for new employees through Code of Conduct orientation. Innofactor does not separately track the number of employees who regularly participate in these training activities. To date, Innofactor has not identified a specific need to provide anti-bribery and anti-corruption training to particular risk groups.

G1–4 Confirmed Incidents of Corruption or Bribery

During the reporting period, Innofactor did not receive any reports concerning suspected corruption or bribery.

1–5 Political Influence and Lobbying Activities

During the reporting period, Innofactor did not make any direct or indirect monetary or in-kind contributions for political purposes or lobbying activities. During the reporting period, none of Innofactor's Board members or Executive Board members had held an equivalent position in public administration during the two years preceding their appointment.

Innofactor is registered in the EU Transparency Register (registration number 662561951167-22). Innofactor is a member of the following industry associations:

- Software Finland Association
- Technology Industries of Finland

Data Security and Data Protection

Innofactor has recognized the importance of data security and data protection as part of sustainable business operations in the IT sector and sustainable development reporting. The company continuously evaluates the development of its sustainability reporting, including reporting related to data security and data protection.

One of Innofactor's key metrics has been the number of administrative sanctions. During 2023, 2024 and 2025, the number of administrative sanctions imposed on Innofactor under data protection legislation was zero.

Innofactor's management has identified a number of critical cyber risk scenarios against which the company must protect itself and is committed to safeguarding information and information systems belonging to its customers, partners and the company itself. To ensure information security commensurate with the identified risks, Innofactor maintains a certified Information Security Management System in accordance with the ISO 27001 standard.

In its operations, Innofactor is committed to a high level of data protection and respects the privacy and rights of employees, customers and users. Through regular internal audits and the continuous development of information security, Innofactor continuously enhances its internal processes and practices relating to data security and data protection.

In addition to ongoing awareness and training activities, data security and data protection form a mandatory part of employee onboarding. All employees are required to complete annual information security training.

Innofactor's information security group meets regularly and guides the development and implementation of information security and data protection practices throughout the organization. The company has appointed both an Information Security Manager and a Data Protection Officer.

ESRS 2 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	●			

Disclosure requirement	Data point	In the report	The sustainable finance disclosure regulation reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference
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	●			

Disclosure requirement	Data point	In the report	The sustainable finance disclosure regulation reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference
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 metricst	●		●	
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	●			

Disclosure requirement	Data point	In the report	The sustainable finance disclosure regulation reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference
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	●			

Disclosure requirement	Data point	In the report	The sustainable finance disclosure regulation reference	Pillar 3 reference	Benchmark regulation reference	EU climate law reference
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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