

## **SENTIEC OYJ**

# **NON-FINANCIAL INFORMATION STATEMENT 2021**

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## Non-Financial Information Statement

### Business model and value creation

Sentiec Oyj, the parent company of Citec Group, was established 2020. In this report "Citec Group" or "Citec" refers to the whole Sentiec Oyj Group of companies, including the parent company Sentiec Oyj.

Citec Group is an international multi-discipline engineering and technical documentation services company founded in 1984 with headquarters in Vaasa, Finland. Citec Group operates in the energy, process, oil & gas & electrofuels and machinery & equipment markets, providing engineering solutions for plants and products, engineering consultancy, technical documentation and digital solutions. Citec provides added value by delivering its services through a global high performing expert organisation, ensuring superior quality, competences, flexibility and cost-efficiency to its customers.

In Citec's strategy, the development areas are digitalisation and sustainability. Digitalisation is a strategic development area for Citec as it enables efficient engineering and project delivery. Citec's digital offering consists mainly of robotics and a digital twin, a plant information browser.

Sustainability has been emphasized in Citec's strategy during 2021 with the target to support its customers' in their sustainability plans through engineering and technical documentation services. Citec has strategically chosen to develop competences and offerings within renewable fuels (e.g. biogas, hydrogen, ammonia, methanol), carbon capture and storage and renewable energy storage.

Citec has operations in six countries. Citec has an own geographical presence in Finland, Norway, Sweden, Germany, France, and India, and has a joint venture company in Saudi Arabia. Since several years, Citec Group operates on the principle of global resourcing and local presence.

Citec's key strategical focus is on developing and nurturing long-term customer partnerships, and the essential means is successful key account management and sales. The current key customer base is mainly in Europe, but Citec also strives to increase its Asia and Americas customer base.

### Environmental, Social and Governance approach - part of Citec's strategy

Citec's basis for the Environmental, Social and Governance (ESG) approach is incorporated in Citec's Operational Framework. Within the Operational Framework, the Citec Operational policy and Citec Code of conduct govern the company's ESG decisions and actions from a broad perspective.

Citec's Environmental Sustainability approach consists of three parts; Selected sustainability technologies, Value engineering and own sustainability actions, of which the first two are planned to be deepened through own development projects during 2022 and onwards.

The Social Sustainability approach incorporates how Citec manages relationships with employees, customers, suppliers and the communities where the company operates. The foundation is based on the commitment to follow the United Nations Global Compact principles, as well as other international standards for Human rights. Citec's Governance approach and goal is to ensure compliance at all levels of operations, as well as openness and transparency in communication both internally and externally.

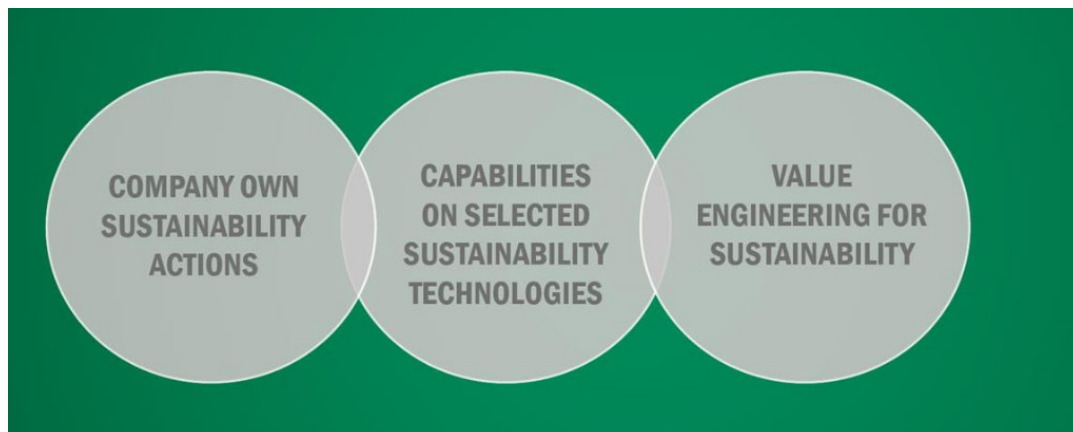
The sustainability topics for Citec are based on dialogue with Citec key customers and employees, as well as risk management. The identified topics are carbon handprint created through Citec services,

reduction of carbon footprint, well-being and employee attraction and retention as well as business ethics and transparency. These topics are the cornerstone of our sustainability agenda, and relate to all the four areas of this Non-Financial Information statement; Environment, Social and personnel, Human Rights and Anti-corruption. During 2022 Citec is planning further to develop the materiality process internally and to conduct an assessment on the impact of the sustainability aspects.

### **Citec's Environmental Sustainability in 2021**

Citec's objective is to increase positive impact on the environment through the customer projects, i.e., indirect influence through engineering and other related consulting services; the so-called handprint. Furthermore, Citec aims at minimising its own carbon footprint through direct and indirect emission reduction.

Citec's target in Environmental Sustainability is to have professional capabilities in a specific set of sustainable technologies helping customers to achieve their business and sustainability targets. The chosen technologies have been assessed through Key Accounts needs and their chosen technologies and where engineering plays a role. The target is also to bring technically sustainable solutions to customer projects through value engineering. This gives value add through for example reduced materials usage and transporting and is a general methodology in the industry. Regarding own footprint, the target is to avoid unnecessary travelling, reduce the carbon footprint of offices, as well as in IT. Taking into consideration our operations, Citec has concluded that these are the most significant ones for Citec.



Citec is ISO 14001 certified by Bureau Veritas and the Environmental Management System enables Citec to manage, maintain and continuously improve the effectiveness of the environmental objectives and targets. Based on the risks evaluated and the targets defined, the key performance indicators are followed regularly. Citec has implemented relevant target setting and follow-up procedures regarding facilities, IT and travelling where Citec can directly impact on environment as well as on the CO2 emissions.

Citec has adopted the United Nations Sustainable Development Goals. Citec strives towards access to affordable, reliable, sustainable and modern energy for all (Goal 7), aims to build resilient infrastructure and to promote inclusive and sustainable industrialisation (Goal 9), and make cities and communities inclusive, safe, resilient and sustainable (Goal 11). Citec is also committed to take action to combat climate change and its impacts (Goal 13) and to protect ecosystems and halt biodiversity loss (Goal 15).

### **Citec's guidelines regarding Environmental decisions**

Citec's guidelines regarding Environmental decisions are set in the Citec Environmental policy. The purpose with the Citec Environmental policy is to align Citec's business operations to the environmental approach. Through the Environmental policy Citec is committed to anticipate environmental issues and proactively promote sustainability and environmental aspects in the customer interface.

Furthermore, Citec strives to continuously improve own and customers environmental performance by utilising practices that protect employees and the environment, including reducing the quantity of emissions and material usage, developing engineering opportunities for recycling, energy minimisation and pollution prevention and use other resources more efficiently.

Several of Citec's other policies also include the environmental and sustainable aspects and thus support the same target. These are the Citec Travel policy, Citec Car policy and Citec Office policy as well as Citec Information Technology policy.

Environment, Health & Safety (EHS) internal audits are part of Citec's annual review process in all legal entities. In the audits Citec has reviewed the legal compliance related to environmental legislation required in our kind of business. Furthermore, the status locally regarding Citec's Environmental indicators.

### **Environmental risks and their management**

Citec does not have major environmental risks of its own, as Citec is not a manufacturing company by origin. However, Citec has identified external environmental hazards, that based on the office locations might have an impact on the operations.

These hazards have a low probability. The identified types of hazards are water and weather-related hazards, terrorism and/or civil disorder.

### **Citec's outcome of the Environmental approach in 2021**

According to Citec's environmental action plan for 2021, Key Account specific sustainability targets have been made as well as identification of capabilities for the selected technologies.

To build awareness about Environmental Sustainability among Citec employees, a Sustainability communication program was kicked-off during 2021. The program continues during 2022.

The relevant Key Performance Indicators and Environmental indicators for Citec's business, and for which target setting and follow-up procedures have been implemented in 2021, are related to own footprint. Citec can impact on environment in three main categories; Offices, IT and Travelling. The overall target in these chosen areas has been to reduce the emissions compared to previous year.

In 2021, Citec has successfully shifted offices in seven sites and reduced the office space per headcount with 26%. Office square meters per headcount (m<sup>2</sup> / HC) is one of Citec's KPI's as part of the Management System. The other office related indicators show a reduction, although both 2020 and 2021 form somewhat exceptional years due to Covid-19. Currently, Citec Finland and Citec

Sweden use 100% renewable electricity in the premises. The typical setup, however, is that Citec rents premises and is dependent on landlord's decisions regarding so called green energy.

For 2022 additional indicators have been identified and are implemented. Citec's footprint is naturally, compared to the impact with handprint, modest due the form of business/sector that Citec operates in. Due to the pandemic and travel restrictions, both 2020 and 2021 have been years with little travelling.

Citec's summaries of 2021 for the Environmental indicators:

<b>Office m2 / Head count</b>		<b>2021</b>	<b>2020</b>	<b>Change</b>
	m2 total	17 420	19 098	-10%
	m2 / HC	14	19	-36%

		<b>2021</b>	<b>2021</b>	<b>2020</b>	<b>Change</b>
<b>Environment, Office</b>		<b>CO2 kg eq</b>	<b>CO2 kg eq / HC</b>	<b>CO2 kg eq</b>	
Scope1	Printed paper usage (pcs)	2147	2	2259	-5%
Scope2	Electricity (kWh)	339 974	279	306 831	10%
Scope3	Waste, paper (kg)	3137	3	4293	-37%
<b>Environment, Travel</b>					
Scope3	Travelling, Train (km)	693	0.6	635	8%
Scope3	Travelling, Flight (km)	132 076	108	174 151	-32%
<b>Total</b>		<b>478 027</b>	<b>392</b>	<b>488 169</b>	<b>-2%</b>
<b>CO2 ton eq</b>		<b>478</b>			

**Notes:**

For printed paper usage in Citec Sweden, the 2021 yearly is estimated based on one quarter in same premises.

For printed paper usage in Citec Finland's one site, one quarter in 2021 is estimated based on one other quarter in same premises.

For printed paper usage in 2020, Citec Sweden, Citec Norway and Citec France did not have follow-up procedures. Comparability between 2021 and 2020 is limited.

For electricity Citec Germany, Citec France and for two sites in Citec Finland estimates are based on other similar premises in Citec Finland. Citec Norway 2020 is estimated based on other similar premises in Citec Norway 2021.

Waste, paper in Citec France in 2020 and 2021 is estimated based on similar premises and headcount in Citec Finland site. Citec Norway 2020 is estimated based on other similar premises in Citec Norway 2021.

For travelling by train in 2020, Citec Sweden and Citec France did not have follow-up procedures. Comparability between 2021 and 2020 is limited.

### Citec's eligibility per EU Taxonomy

In 2021, all Citec's projects and services have been identified as either not applicable from sustainability perspective or as applicable and done because of climate change and/or for climate adaptation. To the latter group identified are the Renewable fuels projects, Carbon capture and storage projects, Renewable energy storage projects and 'Other sustainable' projects which capture projects clearly linked to climate change adaptation. Citec considers these as EU Taxonomy eligible activities.

The EU Taxonomy is a classification system, listing environmentally sustainable economic activities. The purpose in EU was to have a shared language and definitions on what is sustainable, ultimately directing investments towards sustainable projects and activities according to EU's 'Green deal' strategy. As per the EU Taxonomy regulation, Citec has identified one economic activity towards

which Citec's eligibility is evaluated. That is the 9.1. activity 'Engineering activities and related technical consultancy dedicated to adaptation to climate change' associated with NACE code M71.12 as this activity includes Citec's core business; i.e. engineering design and consulting activities applying physical laws and principles of engineering in the design of plants, industrial processes and machinery as well as projects involving civil engineering.

Furthermore, the 'dedicated to adaptation to climate change' has been evaluated against the definition from the EU regulation 2020/852; (25) An economic activity that pursues the environmental objective of climate change adaptation should contribute substantially to reducing or preventing the adverse impact of the current or expected future climate, or the risks of such adverse impact, whether on that activity itself or on people, nature or assets.

### Citec's EU Taxonomy accounting principles

Citec's accounting principles for these calculations are based on the understanding of the EU Taxonomy Regulation and delegated acts and the currently available guidelines from the European Commission.

The share of Citec's taxonomy-eligible revenue is calculated as the revenue derived from projects or services associated with chosen taxonomy-eligible economic activity as a proportion of Citec's total revenue. Based on the evaluation of Citec's projects and services, described above, 17.9% of the economic activity is considered eligible and 82.1% is non-eligible. Citec do not report operating expenditure, which consist mainly of eligible services or capital expenditure referred to in the Taxonomy Regulation. Thus, eligible Opex is 0% and non-eligible Opex is 100%. Likewise the eligible Capex is 0% and the non-eligible Capex is 100%.

During 2022 the actions and development of the sustainable solutions portfolio will continue.

The Taxonomy Regulation sets out a three-step approach towards taxonomy alignment of economic activities: a) Substantially contribute to one or more of the six environmental objectives; 1. Climate change mitigation, 2. Climate change adaption, 3. Sustainable protection of water and marine resources, 4. Transition towards circular economy waste, prevention and recycling, 5. Pollution prevention and control and 6. Protection of healthy ecosystems, b) Do no significant harm to the other five environmental objectives and c) Comply with the minimum safeguards covering social and governance standards.

With respect to the EU Taxonomy alignment evaluation, Citec is developing a pre-evaluation method where the target is to evaluate the coming and already conducted projects' sustainability from the different upcoming objectives perspectives. This aims also at evaluating the Do No Significant Harm objectives.

Finally, as Citec conducts global operations in accordance with applicable laws, regulations, and other requirements, compliance follow-up is important to us. Citec's policies, values and procedures for example in the event of whistleblowing, incorporate and include the minimum social safeguards as per the EU Taxonomy.

### **Citec's Social Sustainability and personnel in 2021**

Citec's objective is to keep good social standards with customers, personnel and suppliers.

Citec's focus in Social Sustainability is on attracting, retaining and developing our employees, current and future. The focus is also on everyone having proper working conditions for the health and safety as well as employee well-being. Regarding current and future customers, focus is on customer satisfaction and preventing quality non-conformities. Citec proactively promotes United Nations Sustainable Development Goals as well as the United Nations Global Compact.

Citec's core company values are impact, excellence and respect. Citec has a passion for delivering exceptional results and continuously develop the competences. Citec is committed to treating all co-workers and customers with respect and equality.

### **Citec's guidelines regarding decisions related to social sustainability**

Citec's employees are the backbone of the business. Consequently, social sustainability is important in Citec's operations. Well-being among employees and retention as well as employee attraction and skilled labour have been considered as important topics for Citec. Citec's guidelines regarding decisions related to employees and other stakeholders are set in Citec HR policy, Citec Health & Safety policy, Citec Communications policy, Citec Information Security policy, Citec Data Protection and Privacy policies and Citec Supplier policies.

The Citec HR policy sets the overall guidelines for managing personnel, whether on Citec's direct payroll or as external consultants at Citec. Complementary policies and instructions are established locally in the Citec countries. Citec is committed to fair and safe working conditions, emergency and safety procedures, equality as well as zero discrimination and harassment.

With the Health & Safety policy, Citec is committed to proactively promote well-functioning and safe working, prevent and support physical, mental and social and well-being as well as safe and healthy work environment in own offices, working at customers premises and during business trips. Furthermore, Citec strives for injury free workplaces and business travels.

The purpose with the Citec Health & Safety policy and the Citec HR policy is to align Citec companies with international and national legislation, authority requirements as well as United Nations Global Compact in any labour matter. Citec companies do not, for example, use grey labour force nor accept discrimination in any form. EHS internal audits are part of the annual review process, including risk assessments by site, compliance with employment and health & safety legislations etc.

### **Risks related to employees and stakeholders**

From the different social perspectives there are risks. Failure in recruiting qualified personnel, lack of needed competence in business-critical projects and key persons leaving are main risks related to personnel. When mitigating these, Citec has internally utilised competence and career development plans, for example internal career development both upwards and horizontally. Citec has also utilised various flexibility measures globally, such as cross-country resourcing as well as multi-skilling. Systematic performance management is in place with close connection to opportunities and challenges. Well-being management on company level and need based on individual level has also been part of the mitigating activities.

In addition to mitigating the mentioned risks, externally Citec has strengthened the employer branding during 2021 and has started to build-up an external partner network.



Labour markets are also constantly changing - currently with a highly competitive demand of skilful engineers. This means Citec needs to develop a flexible supplier network for balancing resource peaks effectively. This concerns direct suppliers, who deliver services and materials to the projects.

From customer perspective, risks are related to not being able to meet the customer expectations and decreases in customer satisfaction levels. Citec does not engage with customers who are subject to sanctions.

Risks with suppliers are related to availability; lack of correct competence level or unexpected changes in supplier's business and resourcing. Citec does not have business dependency towards direct nor indirect suppliers. Main suppliers have nominated owner organisations within Citec and risk mitigations include also scope and time requirements contractually as per Citec's deliveries.

Citec has on preliminary grounds evaluated how to mitigate the possible different social risks as well as a drafted a recovery plan for each risk. Part of the prevention is also Citec's control mechanisms implemented. For example controls in sales process and export control.

### **Health and Safety risks and Covid-19**

At Citec, the work is performed mainly as office work, and everyday risks are related to psycho-social / mental load factors and ergonomic load factors. The risks of accidents in the premises or during travel / travel to sites is small.

In prevention and mitigation of health & safety risks in Citec's legal entities, the close co-operation between employee representatives / occupational safety committee and Human Resources, as well as possible local occupational health care, is important. In practice, risk assessments and work place surveys are conducted locally. Employee surveys, targeted to all employees, are conducted on regular basis. Improvement actions are taken to manage well-being, engagement and to ensure a positive working environment.

The main health & safety risks in 2021 have been fairly clear with the current Covid-19 pandemic. Remote working has been psycho-socially demanding for some personnel. Likewise, the ergonomic load factors have been present. Citec's indicators have not shown major risks and Citec has been able to maintain a high level of utilisation and an operational performance.

Already in 2020, Citec established a Covid-19 task force for operational risk and mitigation management immediately in the outbreak of the pandemic. This work continued in 2021.

From the Environmental Sustainability perspective, the utilisation of premises and thus consumption in offices decreased as did travelling. However, IT supply and infrastructure purchases were required to enable the digital way of working in detail engineering.

From the Social Sustainability perspective, the remote leadership has played an important role for the high commitment shown from Citec employees despite the remote working and the demanding situation throughout the pandemic. The employee survey 2021 showed a high score of commitment. Also the sick leave days in Europe and attrition were low during 2021.

### **Citec's outcome of the Social Sustainability approach in 2021**

In practise, implementing the social sustainability and the policies related has in 2021 consisted of activities in flexible resourcing and especially recruitment. 182 employees were recruited to own

payroll and 172 consultants/freelancers, i.e. altogether 354. Citec growth was also accomplished via a business process transfer in 2021 of 41 employees.

Induction of new employees required a special attention due to the pandemic in 2021. Other competence development consisted of IPMA certifications and an Project Management training program for all Project Managers in Citec.

Well-being and coping during Covid-19 was supported with global webinars to personnel with topics such as Self Leadership and Time Management. To enhance the so called new normal, in 2021 the shift to post Covid-19 was also prepared. A hybrid way of working policy was defined and implemented in all legal entities of Citec. Employee engagement was supported by remote leadership and with systematic global and local communication to all employees.

The relevant Key Performance Indicator’s for social sustainability and for which target setting and follow-up procedures have been implemented in 2021 are related to Citec’s own personnel and customer satisfaction.

Looking at the other indicators in addition to recruitments, the attrition rate among own employees has decreased to 7.9%. Likewise, the sick leave days per employee in Europe, as the sick leaves are not followed by days in India, has decreased to 5.8 days / employee in Citec. There were no work accidents in 2021. The learning hours per person was 42 hours in average.

Summary of 2021 for the KPI’s related to own employees:

<b>Employees</b>	<b>2021</b>	<b>2020</b>	<b>Change</b>
Attrition rate, own employees (%)	7.9%	8.5%	-8%
Learning hours /person, own and external (hours/person)	42	25	41%
Sick leaves days/employee (days/employee)	5.8	6.5	-12%
Lost working day accident (amount)	0	0	0%

*Notes:*  
 Sick leaves days/employees for Citec Europe. Citec India sick leaves not followed by days.  
 In Citec India 11 employees was on Long term sick leave during 2021.

To summarise, the outcome of all Covid-19 supporting activities taken in Citec 2021 as well as active remote leadership has had a positive impact and the commitment rate among employees has remained on a good level.

The Net Promoter Score during 2021 was +24. The customer satisfaction is collected from the projects conducted and from the services once a year. The response rate from customers was very high, 81%.

In addition, specific feedback from customers is collected on the deliveries; quality, costs, on-time, proactiveness, co-operation and communication. Also in each of these areas Citec has improved during 2021.

Suppliers’ compliance with Citec Supplier policy includes a commitment to Citec’s Code of conduct.

The communities where Citec operates in are important and Citec donates to selected charities, focused on e.g. education and the environment on an annual basis. In Citec India, the social responsibility activities are to a certain extent mandatory, and Citec naturally adheres to these regulations.



## Human rights and discrimination, anti-corruption and bribery at Citec

Citec's aim is to have systematic management of all operations. The Citec Operational Framework is ISO 9001 certified by Bureau Veritas, and is regularly monitored, developed and updated. In addition, Citec Oy Ab has an Achilles certificate for suppliers in Nordics and Central Europe pre-qualification system. Citec Norway AS has an JQS certificate of qualification for suppliers to the oil and gas industry in Norway and Denmark.

Citec follows the United Nations Global Compact principles, as well as other international standards for Human rights.

### Citec's guidelines for compliance behaviour

Business ethics with transparency have been considered important topics for Citec. Citec's Code of Conduct forms the framework for all operations and sets out standards of compliance behaviour. It incorporates the human rights and personal interests, anti-corruption and bribery, fair competition as well as data protection, amongst other and is based on the ten principles of the United Nations Global Compact and other international ethical standards.

The purpose with the Code of Conduct is to do sound decisions as a business partner, supplier, customer and as an employer at all times. Corruption or bribery is not tolerated in any form. Relevant legislation to prevent any kind of financial crimes concerning, for example, trade compliance, money laundering, fraud or tax evasion is followed. In 2021, Citec communicated to all employees the importance of compliance, covering topics such as bribery and anti-corruption.

In addition to the Code of Conduct, Citec has issued the Citec Supplier Policy that sets forth the principles of acceptable behaviour by the suppliers. Suppliers shall carry Citec's social responsibility and avoid conflict of interests from Citec or Citec customers' point of views. Suppliers' compliance with Citec Supplier policy includes a commitment to Citec's Code of conduct.

### Risks related to human rights, discrimination, reputation, corruption or bribery

Citec's business consists of expert services in different engineering and documentation fields. Therefore the risks related to human rights like child labour is not applicable, i.e. Citec does not have any grey market labour and does not make any political or religious contributions.

Citec does not tolerate any discrimination or harassment based on race, nationality, gender, age or any other reason and treats everybody equally. However, naturally the risk exists for discrimination. To mitigate such risks, Citec communicates regularly and reminds about one of the core values, respect. Citec provides possibilities for the employees to bring forward any possible cases through different channels; employee surveys, employee representatives, occupational health care or the human resources department. Typically these channels include procedures where independent parties handle the case.

All Citec employees are expected to act for the best interest of Citec, to safeguard the Citec brand and the company reputation. To mitigate reputational risks, Citec avoids conflict of interests from Citec or Citec customers' point of views, e.g. by not engaging into competing business activities. Friendships and relative relationships in business context are in Citec's attention, e.g. supervising or hiring close relatives as direct sub-ordinates is not allowed.

Citec systematically mitigates corruption and bribery through Citec’s sales process and offer review procedures, approval principles where initiator, reviewer and approver / signer are always separate persons. Also Citec’s invoice system is built accordingly.

Citec relies on its employees to carry out the business in accordance with internal corporate policies for governance and compliance. If any employee violates such internal policies, it may expose Citec to risks such as being in breach of agreements, entering into contradictory agreements, violating applicable laws and regulations etc. The risks described above could have an adverse effect on Citec’s operations, earnings and financial position.

### **Citec’s outcome in the governance area in 2021**

In 2021 Citec communicated to all employees the importance of compliance covering topics such as anti-corruption, human rights, data protection, whistleblowing, environment and assets, confidentiality, amongst other. In case of potential conflict of interest, each case is assessed case by case to adhere what Citec as company stands for; the values and policies.

The aim of the Whistleblowing (WB) policy is to encourage employees and others who become aware of wrongdoing in Citec affecting some other person or Citec’s operations to come forward and voice those concerns at the earliest opportunity so that they can be properly investigated. The WB policy also lays down common standards for the protection of the persons reporting. The implementation is planned to the beginning of 2022.

There were no incidents for bribery or corruption, reported in 2021. Nor were there any non-conformities or Human rights related findings from the external audits. There was one external court case where Citec has been plead guilty during 2021 regarding a dismissal compensation in France. As corrective actions Citec has improved internal processes and contract templates in France. There was three internal data privacy incidents reported in 2021. These incidents have been investigated in accordance with Citec’s internal data privacy incident reporting process. None of the occurred incidents have been evaluated to create material risk to personal data and the risk associated to these incidents have been controlled and mitigated by internal means. Consequently, no reporting obligation to the data protection authorities has arisen in 2021 as per applicable data protection legislation.

Espoo, 25 March, 2022

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Johan Wentzel, Chairman of the Board

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Clas-Eirik Strand

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Rune Westergård

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Antti Keränen

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Johan Westermarck, CEO