

SOLTEQ



Voluntary Sustainability Report

2025

Sustainable Development at Solteq

Sustainably produced solutions and operating with high responsibility as a service provider, employer, partner, and corporate citizen are preconditions for successful business and strong stakeholder relations. Sustainable practices are guided by the Company's Code of Conduct and its operating principles on anti-bribery and corruption, human resource management, sustainable development, environmental responsibility, information security, and data protection. In addition to the Company's internal guidelines, sustainable practices are guided by local legislation, regulations, directives, and standards issued by authorities, as well as international principles governing ethical business, human rights, and corporate responsibility.

Preparing for Changes in Sustainability Reporting

Since 2023, Solteq has started preparing for sustainability reporting in accordance with the European Sustainability Reporting Standards (ESRS). Sustainability topics have been assessed using an ESRS-compliant double materiality assessment methodology. In addition, the Company has conducted an extensive stakeholder survey to examine the views and needs of the key stakeholders regarding Solteq's sustainable practices and related reporting. Solteq will continue to develop its sustainability strategy based on the results of the double materiality assessment and the stakeholder survey.

The Company is not obligated to prepare a sustainability report for the financial year 2025, as the required threshold for the number of employees was not met. Therefore, the Company has decided not to prepare a CSRD Directive (Corporate Sustainability Reporting Directive) compliant sustainability report for 2025. The Company will commence sustainability reporting under the ESRS (European Sustainability Reporting Standards) for the financial year 2026.

Double Materiality Assessment and Material Sustainability Topics

In 2025, Solteq supplemented its previously conducted double materiality assessment and stakeholder survey with a new, data-driven double materiality analysis. The AI model used in the analysis combines scientific data sources and company-specific data to assess both impact materiality and financial materiality in accordance with the ESRS guidelines. The double materiality analysis took into account the company's product and service portfolio, value chains, and the revenue distribution of its products and services. In addition, the analysis considered the company's operations, supplier network, and customer base across different countries. In 2025, the double materiality assessment was conducted by Upright Oy.

The double materiality analysis was conducted from both impact and financial materiality perspectives. Impact materiality was assessed based on the scale, scope, irremediability, and likelihood of the impacts. Financial materiality was examined in terms of the magnitude and likelihood of financial effects. The analysis assessed Solteq's impacts on the surrounding society and stakeholders, as well as the impact of ESRS sustainability topics on Solteq's business.

The materiality of ESRS sustainability topics was determined by scoring them across different categories. The scoring was benchmarked against threshold values derived from comparative data from the double materiality assessments of more than 50,000 companies.

In previous years, the Company has defined social responsibility, data protection and information security, anti-corruption and bribery, as well as environmental responsibility as the key areas of sustainability for its operations. The updated double materiality analysis confirmed previous assessments, and the material sustainability topics identified were climate change and the circular economy under environmental standards, the own workforce under social standards, and business conduct under the governance standard.

Responsibility in Customer Relationships

Solteq helps customers find solutions that suit their needs, are technologically modern and offer a high level of information security. Customer satisfaction is monitored regularly.

Solteq's quality plan defines the principles governing quality management in customer projects. Instructions and guidelines related to quality planning, assurance, control, and improvement aim to ensure the high-quality execution of customer projects and the achievement of the agreed-upon objectives.

Risk Management System

The Group's risk management is guided by legal requirements, regulations and instructions given by authorities, other rules and standards binding the Company, business requirements set by the Company's shareholders, and the expectations of other stakeholders. The goal of risk management is to identify and acknowledge risks related to the Company's operations, and to ensure they are appropriately managed when making business decisions. The Company's risk management supports the achievement of strategic goals and ensures the continuity of business operations.

Risk management aims to ensure that the risks affecting the Company's business are identified, managed, and monitored. To ensure the implementation of sustainable practices, the Company has identified and systematically monitors areas, such as:

- risks pertaining to employees and working, such as those related to discrimination, working conditions, and equal pay,
- risks related to information security and privacy, particularly phishing, data breaches, or other leaks of personal data,
- risks related to corruption and bribery, particularly concerning the supply chain and customer relationships, and
- risks related to the Company's reputation and stakeholders' trust in the Company, such as changes in the operation of the Company or its partners, any accidents, crises affecting environment and personnel, and negative publicity. The Company is prepared to communicate in a timely and clear manner during crises and exceptional and disruptive circumstances to maintain stakeholders' trust in the Company. The Company has an up-to-date crisis communication plan.

Managing Corporate Responsibility and Sustainability

The Executive Team and the Board of Directors regularly discuss sustainability topics identified as material. The CEO is responsible for sustainability reporting. When CSRD-compliant reporting begins, the same instances responsible for financial reporting will be responsible for sustainability reporting.

Personnel

Employee well-being, a more cohesive culture, and a functional work community were the key focus areas for HR in 2025. Employee training programmes were expanded, and services supporting wellbeing at work were strengthened to enhance the organisation's ability to operate and succeed during times of change.

A wide range of training opportunities was provided to employees throughout the year. Leadership training for managers focused on developing people and business leadership skills as well as strengthening competencies in HR processes and tools. For experts, training was offered on, e.g., self-management and relevant technical capabilities. The training programmes will continue in 2026.

Employee well-being at work was supported through flexible working hours, remote work opportunities, and comprehensive benefits that included opportunities for exercise, cultural activities, and overall well-being. Services supporting mental health were significantly expanded, which contributed to a clear reduction in long-term sick leave related to mental health issues compared to the previous year.

The efficiency and cost-saving measures implemented during the year, including those affecting personnel, were reflected in employee satisfaction. In 2025, the employer Net Promoter Score (eNPS) was -22 (-27). Employee satisfaction is monitored through weekly pulse surveys and a more comprehensive annual survey. The results are used to support the development of employee experience and leadership practices.

Successful recruitment plays a strategic role in a business based on skilled personnel and optimal resources. To improve the recruitment process, managers received additional training, and centralised recruitment processes were renewed. In 2025, the company recruited 45 new employees (34). Employee turnover was 11 percent (15). Furthermore, the company also actively sought out internal job rotation opportunities for existing employees.

As an employer, Solteq strives to be flexible and to promote equality and diversity. All employees are treated equally regardless of gender, ethnicity, religion, age, or other such factors. In 2025, the company launched a development project to implement pay transparency in line with the EU Pay Transparency Directive, with completion scheduled for 2026. In 2025, the average age of employees was 44 (43), and women accounted for 29 percent of the workforce (27).

Solteq respects internationally recognized human and workers' rights and nurtures a safe and healthy work environment for all its employees. The fundamental principles of Solteq's personnel management have been defined in the action plans related to personnel. According to the Company, there are no significant risks of human rights infringements associated with its operations. Possible risks of human rights infringements are related to the supply chain. These risks are managed by carefully selecting business partners and obligating them to adhere to Solteq's sustainability principles or equivalent sustainability principles.

Data Protection and Information Security

The confidentiality of data and the integrity of information systems are at the core of Solteq's information security efforts. It is crucial for Solteq to protect the privacy of its stakeholders and the processing of confidential data.

Solteq has conducted an applicability assessment of the Finnish Cybersecurity Act (NIS2 Directive) in cooperation with KPMG Oy Ab, and Solteq is considered a key operator under the Cybersecurity Act. Based on the assessment, the requirements of the Cybersecurity Act apply to certain aspects of Solteq's business, particularly cloud, support, and maintenance services. The company has been entered in Traficom's (Finnish Transport and Communications Agency) NIS2 operator register.

Solteq has expanded its service portfolio with AI- and data-related solutions. The risk-based approach of the EU AI Regulation applies to AI-related solutions, particularly in the roles of deployer and provider of AI models. The applicability of the EU Data Act is assessed, in particular, in relation to customer-specific data processing services and the content of new customer agreements.

Solteq's company-level IT operations, encompassing information security practices, monitoring systems, and risk management, received ISO/IEC 27001:2013 certification in 2019. The certification requires continuous development of information security and data protection. In the 2025 audit, the certification was updated to ISO/IEC 27001:2022. The audit was performed by KPMG IT Certification Ltd. No significant shortcomings were found.

Regarding personal data, Solteq operates as both a controller and a data processor. The Company's data protection practices are publicly available. Solteq processes personal data in compliance with legislation and only collects personal data when necessary.

Solteq provides its customers with guidance and instructions related to appropriate technical and organizational measures, which contribute to privacy protection in society. In its preparedness planning, Solteq has considered the growing global cyber threat landscape, including supply chain attacks.

Cybersecurity threat prevention and communication are managed through an established Security Incident Reporting process that ensures relevant parties are informed of potential or actual security incidents. With this process, Solteq aims to ensure efficiency in handling information security incidents. Solteq is involved in a trust-based network (Digipooli) led by the National Emergency Supply Agency that brings together businesses and public authorities to strengthen societal preparedness and safeguard operating conditions in the event of disruptions and exceptional circumstances. Solteq also participates in Traficom's ISAC group, where information and experiences related to information security are shared, thereby contributing to the overall national information security.

Solteq employees' information security skills are maintained through regular and mandatory training. Solteq employees already receive information security training as part of onboarding. Extended data protection and information security training for all personnel was introduced in the spring of 2019. Training sessions are arranged annually, and in 2025, over 90 percent of the employees completed the Information Security and Data Protection training.

Responsibility for Solteq's information security and data protection, as well as the application of the EU's new data and artificial intelligence regulations, lies with the information security team, which works

closely with the business units. The information security team includes technical and legal experts as well as the Data Protection Officer.

Anti-Corruption and Bribery

Solteq does not condone bribery or corruption in any form. The Company requires compliance with anti-bribery principles and the principles governing business transparency in all operations.

Solteq chooses its partners carefully and all payments are subject to appropriate approval using a pre-defined phased approval process and must be recorded in the Company's accounts. The Company does not pay or approve of any questionable benefits. All benefits given or received must be transparently reportable to everyone. The Company is committed to transparency in all its business operations.

Solteq's Board of Directors has approved the Company's Anti-Corruption and Bribery Policy and its principles in 2016. The policy complements Solteq's Code of Conduct. In addition, Solteq requires its suppliers and partners to commit to the Company's ethical principles or corresponding principles concerning corporate responsibility.

Solteq's stakeholders are primarily domestic and Nordic entities. The Company's business is conducted in regions with low corruption and bribery risk. Solteq assesses partnership risks on a case-by-case basis and requests additional accounts and clarifications, when necessary, based on the partnership risk assessment.

Solteq has a whistleblowing channel to enable anonymous reporting of suspected misconduct and the follow-up of reports. The Company is committed to processing all reports confidentially and in accordance with a standard process. Solteq complies with the EU Whistleblowing Directive and national legislation. During 2025, no suspected misconduct meeting the Whistleblowing criteria was received.

Climate and Environment

Solteq considers climate and environmental perspectives in its operations. Reporting under the Corporate Sustainability Reporting Directive (CSRD) will begin for the financial year 2026.

Assessing Greenhouse Gas Emissions

Solteq has assessed the greenhouse gas emissions from its operations since 2020, following the International Greenhouse Gas Protocol. The calculation of the climate burden from greenhouse gas emissions considers direct emissions from the Company's operations (Scope 1), indirect emissions from purchased energy (Scope 2), and indirect emissions from the value chain and procurement (Scope 3). The climate burden arises from emissions of greenhouse gases such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) into the atmosphere. Greenhouse gas emissions are expressed in carbon dioxide equivalents (CO₂e), accounting for the different global warming potentials of various greenhouse gases using characterization factors (GWPs, global warming potentials).

- In 2025, Solteq Group's value chain greenhouse gas emissions amounted to 366 tCO₂e, calculated on both a market-based and a location-based basis. Scope 1 covers direct emissions resulting from the Company's operations, which arise from emission sources owned or controlled by the Company. These cover greenhouse gas emissions from the consumption of fossil fuels in leased cars, which accounted for 0.5 percent of total emissions.
- Scope 2 covers indirect emissions from purchased energy used in the Company's operations. These include greenhouse gas emissions from electricity, heating, and cooling of the premises, as well as from leased electric vehicles. Together, these emissions accounted for 12.7 percent of the market-based emissions.
- Scope 3 covers indirect emissions from the Company's operations, including those related to the value chain and procurement. The 2025 calculation covers the greenhouse gas emissions from business travel, commuting, and equipment, as well as from equipment suppliers' emission data related to the use of the equipment, and capacity purchases. Scope 3 emissions accounted for 81.9 percent of Solteq's total emissions. Equipment and capacity purchases accounted for 52.9 percent of the Scope 3 emissions.

The most significant emission source was purchased goods and services (193 tCO₂e), with server capacity procurement for accounting being the largest share (147 tCO₂e). In calculating emissions related to equipment use, the methodology was partially updated to incorporate primary data obtained from equipment suppliers. In previous years, the calculations were based on monetary purchases; this approach was still applied where primary data was not available. Consequently, total emissions are not directly comparable with those of previous years. For 2025, the calculation was conducted by OpenCO2net Ltd.

The decrease in Scope 1 emissions was driven by a reduction in leased cars and fuel purchases. The reduction in Scope 2 emissions is explained by the increase in the proportion of renewable energy in on-premises electricity and district heating consumption. In Scope 3, the reduction in emissions related to leased vehicles and business travel is explained by a lower number of personnel compared to the reference period. In contrast, emissions from employees' commuting increased compared to the previous year as the amount of on-site work grew.

The development of emissions in 2024–2025

	2025, t CO ₂ e	2024, t CO ₂ e	Change, %
Scope 1	1.63	12.9	-87.4
Scope 2, market-based	46.3	67.2	-31.1
Scope 2, location-based	46.8	95.3	-50.9
Scope 3	318.0	1,203.3	-73.6
<i>Category 1: purchased products and service</i>	<i>193.0</i>	<i>1,080.5</i>	<i>*</i>
<i>Category 6: business travel</i>	<i>76.5</i>	<i>89.9</i>	<i>-14.9</i>
<i>Category 7: employee commuting</i>	<i>47.9</i>	<i>32.9</i>	<i>+45.6</i>
Total, Scopes 1–3			
Market-based	366	1,283.4	*
Location-based	366	1,311.5	*

*) Scope 3, Category 1 figures are not directly comparable with previous years, as the calculation is now based on supplier-provided primary data on device usage emission, whereas in previous years, emissions were estimated based on increased capacity procurement costs, using monetary purchases (in euros) as a proxy due to the lack of physical data. Accordingly, neither the market-based nor the location-based total emissions are comparable with earlier reporting years. For the 2026 emissions reporting year, efforts will be made to further improve accuracy by using emission data based on physical quantities, and reporting will be carried out in accordance with the CSRD and the ESRS E1 standard.

The greatest potential for limiting greenhouse gas emissions lies in favoring renewable forms of energy in facility choices and capacity procurement. In addition, restraint in business travel also helps to mitigate emissions. In the future, direct greenhouse gas emissions can be reduced by favoring electric cars in leasing contracts.

The following measures can improve the reliability and accuracy of the calculations:

- Conducting emissions calculations in a way that allows a greater share of the assessment to be based on physical emission factors.
- Including all significant Scope 3 categories that cause emissions.

Managing the Environmental Impacts of Activities through Everyday Choices

Solteq strives to reduce the environmental impact of its premises and equipment and to increase material recycling. When choosing premises, the company favors modern, energy-efficient, and healthy spaces.

Centrally located offices, the use of modern communication technology, and remote work opportunities aim to reduce the need for traveling. The Company continues to favor sustainable means of travel, whenever team meetings and other face-to-face meetings are organized.

A significant proportion of the industry’s environmental impacts arises from hardware manufacturing. Solteq considers this in its purchase practices by favoring energy efficiency, lifecycle, and hardware reliability. Network and information system hardware and phones are mostly purchased from well-known and certified suppliers. Equipment that has reached the end of its life cycle is collected in WEEE collection containers at Solteq’s offices for recycling and use as raw material for electronics. Solteq engages in dialogue with different equipment suppliers to support sustainable principles.

Solteq's Sustainability Priorities, Objectives, and Key Performance Indicators

Topic	Principles and processes	Objective	Performance indicators	2025	2024	2023	Most significant risks
Anti-corruption and Bribery	<p>Anti-corruption and bribery policy</p> <p>Engaging the commitment of employees and partners</p> <p>Whistleblowing channel</p>	Commitment of employees and other stakeholders	Number of reported infringements	0	0	0	<p>Criminal and other legal sanctions</p> <p>Impacts on customer relationships and public procurement</p> <p>Reputation risk</p>
Management of identified risks	Several online trainings are organized for personnel in connection with the risk factors identified during the year. Topics include data security and protection and prevention of corruption and bribery.	Personnel training and effective prevention of risks	Participation of the personnel in annual mandatory trainings	90%	83%	80%	<p>Risks related to data protection and information security</p> <p>Risk factors related to the Company's reputation</p>
Personnel	<p>A culture of sharing knowledge, working together, and experimenting</p> <p>Development of leadership and managerial work</p> <p>Performance reviews and competence management</p> <p>Competitive benefits</p> <p>Development of the employee experience</p>	<p>A more unified, successful, and happier workplace</p> <p>The Company supports competence development, provides an equal and non-discriminatory workplace community, and supports individual wellbeing</p> <p>Positive employee experience</p>	Employer Net Promoter Score (eNPS)	-22	-27	-29	Dissatisfactory employee experience
Environmental Responsibility	<p>Measurement and analysis of greenhouse gas emissions</p> <p>Life Cycle Management</p>	<p>Mitigation of the Company's greenhouse gas emissions</p> <p>Re-use of workstations</p>	<p>Company's market-based greenhouse gas emissions, t CO₂e</p> <p>Percentage of workstations that have been reused out of all workstations.</p>	366*	1,283	789	<p>Climate change related potential risks</p> <p>Reputation risk</p>

*Company's market-based greenhouse gas emissions are not comparable to previous years because the calculation has partially shifted from spend-based estimates to supplier-provided primary data on emissions from equipment use.