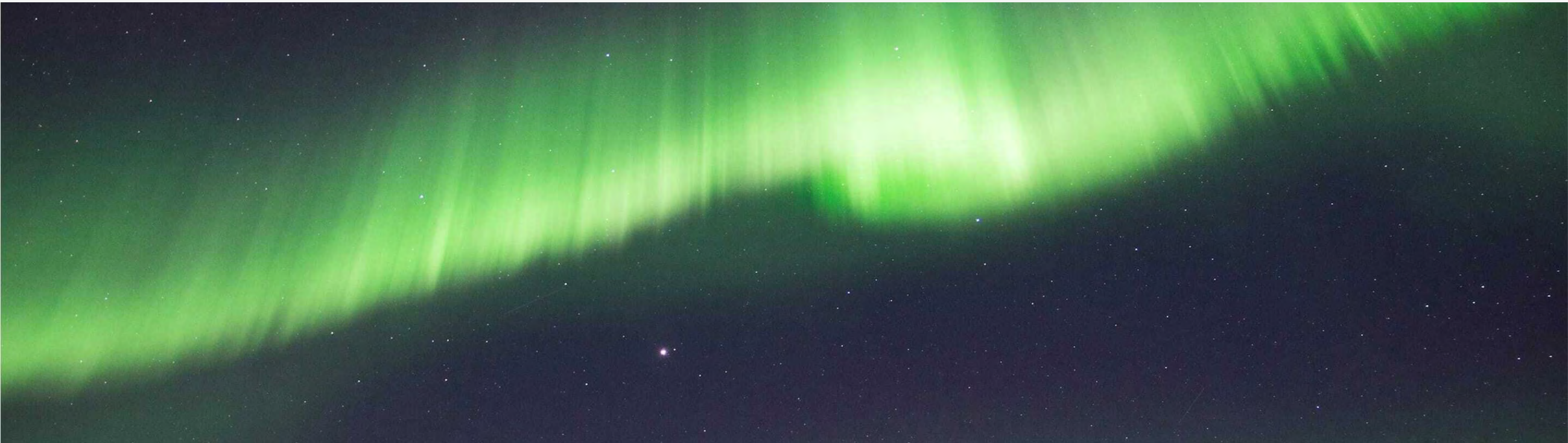


# Sustainability Report 2025



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# About us

We build digital solutions for a living, and that puts us in a position to make a real difference. Together with our digital engineers, we create trustworthy, high-quality solutions that are inclusive, use AI with care, and keep data safe. Solutions that are built to last. That's how we turn everyday work into lasting value.

# Building sustainable digital success

At Nitor, we have always believed that doing the right thing and doing good business go hand in hand. In the future, companies will be the ones to address the sustainability challenges of our time, not by waiting for regulation to set the minimum standards but by choosing to act more quickly and explore new ways. We do not see sustainability as a hurdle to overcome. It is one of the perspectives to consider in every decision, alongside other business factors, when assessing what truly makes sense for the long term. This includes evaluating not only profitability or strategic fit but also whether it is sustainable.

What does it mean to build sustainable digital solutions? For us, it begins with recognising that the solutions we build reach far beyond our immediate customers and impact the people who use them daily. That reach brings both responsibility and opportunity, and in digital development, this question carries significant weight.

Our greatest opportunity for positive impact lies in our work with customers. Together, we can choose to build digital solutions that are accessible, energy-efficient, and trustworthy. Solutions that include rather than exclude and

hold up over time. We do not make these choices expecting to save the world on our own. We make them because they reduce risk, enhance quality, and create lasting value.

At the heart of our sustainability efforts are Nitoreans. When individuals feel trusted, supported, and encouraged to grow, the work they deliver creates value for customers and society. This is why we remain committed to skills development, wellbeing, and fostering a culture that enables people to perform at their best.

In 2025, we continued building on the foundation laid in our first sustainability report. We got a clearer picture of our data and established our emissions baseline, continued work-life balance and learning commitments, and built long-term accessibility competence with our customers to ensure inclusive user experiences. This report documents that work honestly and in detail. Not to tick boxes, but because transparency is part of how we hold ourselves accountable to the direction we have chosen.

Jens Krogell, CEO

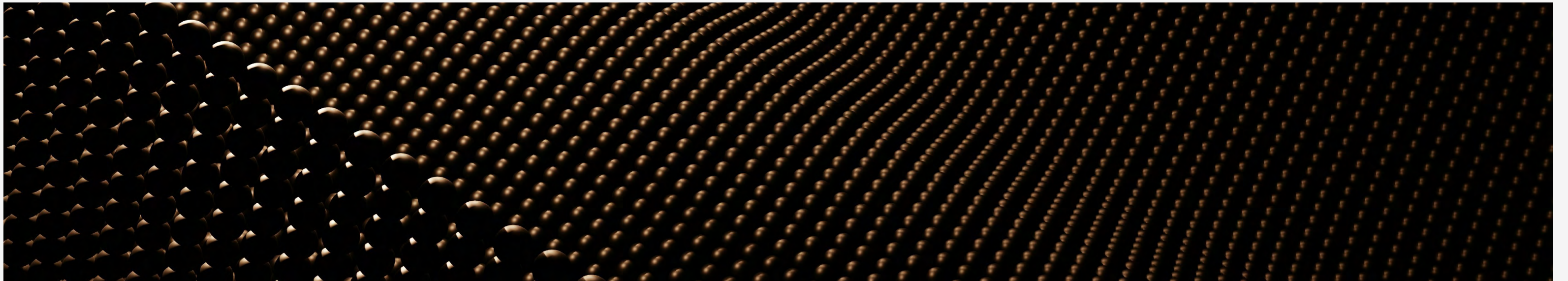


# About Nitor

Nitor is a Digital Engineering Company committed to sustainable digital development. We create trustworthy, high-quality solutions that meet changing business challenges and are built to last. Our Digital Engineers harness digitalisation to achieve creativity, productivity and new business. Through digital strategies, careful AI utilisation, and data security, we help our customers build future-proof solutions.

We bring together the expertise of over 300 professionals. Since our founding in 2007, we've been recognised as a Red Herring Global Top 100 winner, Tivi Company of the Year, and one of the best workplaces in Europe. In 2023, our employer brand was awarded the top prize at The Magnet Employer Branding Awards, and in 2025 we got third place in the HumanPower-25 competition for the most human-centric workplace.

- 40+ M€ net sales
- 300+ Digital Engineers
- 86 NPS score in customer study
- No 1 Best customer satisfaction in the IT sector (Onway) 2012-2025



# General disclosures

## Overview

Digital experiences shape life and work. The way we create them is a choice, and we commit to building responsibly. Our mission is to make digital development sustainable, creating lasting value for customers and society.

# Sustainable digital development

Digital technology shapes the world on a scale that's hard to grasp, and we build digital solutions for a living. That means we're part of the problem, but also in a position to make a difference. We take that responsibility seriously, both in our own operations and in our work with customers.

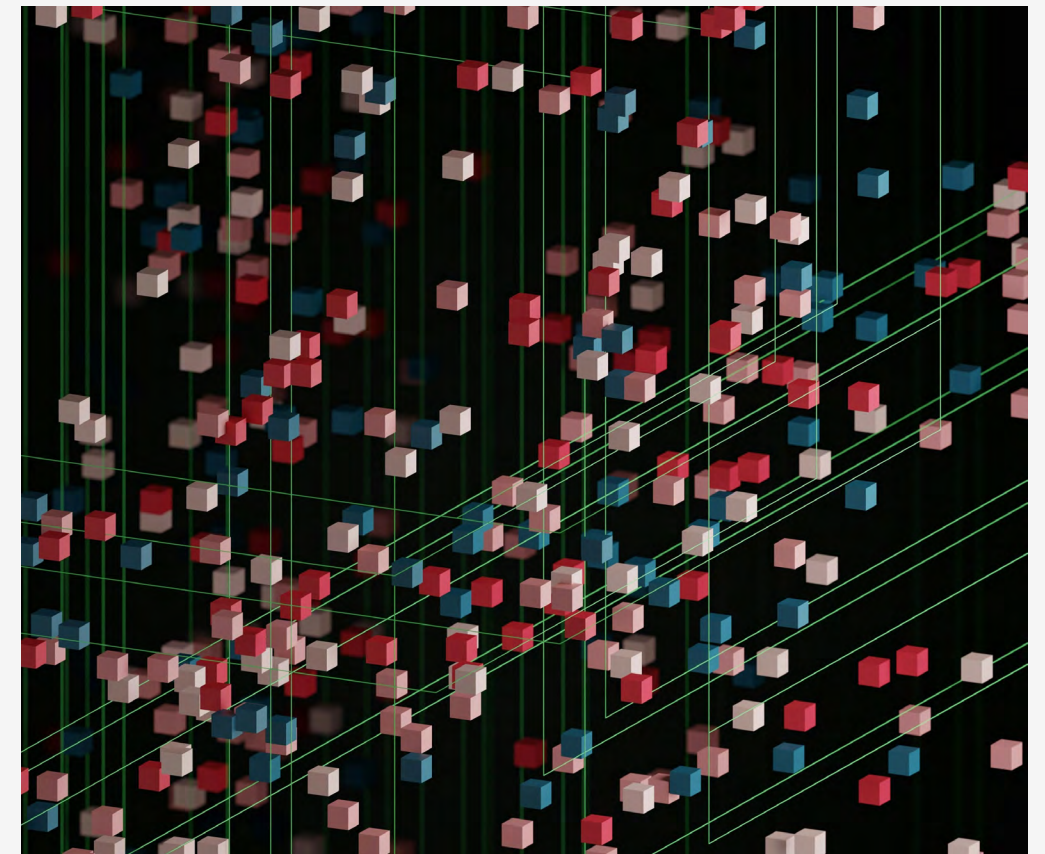
AI is transforming digital development, but it carries real risks: energy consumption, biases, and erosion of trust. We choose to develop and use AI responsibly and trustworthily, applying it in ways that genuinely improve the solutions we build for our customers and for society.

Cybersecurity threats are growing in scale and sophistication. We treat data security as a core part of building trustworthy digital solutions, making deliberate choices together with our customers to keep data secure and systems resilient.

Our greatest impact comes from the work we do with our customers. We aim to be a partner they can rely on, delivering high-quality solutions that meet and exceed expectations, and helping them navigate sustainably in an increasingly digital world.

We know that when people feel trusted, supported, and encouraged to grow, they produce work that delivers real value. That is why we invest in our people's well-being, sustainable workloads, and continuous skill development. A strong culture of sustainability starts from within.

Digital services have a real environmental footprint, and we are working to understand and reduce ours. We have committed to setting science-based climate targets and are working towards their validation, while managing our environmental impact systematically, because you cannot improve what you do not measure.



# Basis for the preparation

BP-1

## Basis for preparation of the sustainability statement

This sustainability statement (the “Report”) has been prepared in accordance with the 2025 Draft Simplified European Sustainability Reporting Standards (ESRS). Although Nitor is not subject to mandatory CSRD reporting, this Report has been prepared voluntarily, reflecting our commitment to transparent and responsible sustainability disclosure.

The Report has been prepared on a consolidated basis, covering Nitor Group and all its subsidiaries, in alignment with the scope of the 2025 financial statements. The reporting period spans from January 1 to December 31, 2025. Where available, comparative information from the 2024 reporting period is included.

## Value chain estimation and outcome uncertainty

Calculation of Scope 3 greenhouse gas emissions relies primarily on a spend-based estimation method using secondary emission factors from public databases, applied across Scope 3 categories 1, 2, 4, 5, 6, 7, and 8. The methodology and emission categories remain consistent with the 2024 reporting period. Some emission factors have been updated to reflect more recent database versions, and the availability of complete financial data for 2025 has improved the coverage and accuracy of the spend-based calculations compared to the prior year.

The company’s value chain covers upstream suppliers of goods and services and downstream customers receiving the company’s IT and digital services. The sustainability statement covers all material parts of the upstream and downstream value chain as identified through the double materiality assessment. Downstream Scope 3 categories have been assessed and determined not applicable to

the company’s business model. The primary source of uncertainty relates to the use of general emission factors, which are averages that may not fully reflect the specific conditions or emission intensities of individual suppliers.

## Changes in the preparation or presentation of sustainability information

Nitor continues to develop its sustainability reporting practices. Compared to the 2024 report, some emission factors used in Scope 3 calculations have been updated to more recent versions, and the availability of full financial data for 2025 has improved the accuracy and coverage of the emissions calculations. These changes may affect the comparability of figures between reporting periods. No retroactive adjustments have been made to the 2024 figures. The company aims to progressively increase the use of supplier-specific emission factors as part of the ongoing development of its emissions calculation process.

# Governance

GOV-1, GOV-2, GOV-3, GOV-4

## The role of the administrative, management and supervisory bodies

Responsibility for Nitor's strategy, governance and operations lies with the General Meeting, the Board of Directors, and the CEO, supported by the Leadership Team. The General Meeting is Nitor's highest decision-making body, where shareholders vote on matters affecting the company. Shareholders establish long-term goals and purpose through the ownership strategy, outlining shareholders' expectations and how ownership will be exercised to meet them.

The roles of each body are defined by the Finnish Limited Liability Companies Act. Although not obligated to do so as a privately held company, Nitor complies with the Finnish Corporate Governance Code 2025 by the Securities Market Association as a framework for good governance practices. The Company's governance also covers the Articles of Association, rules of procedure, and a Code of Conduct, the principles of which the Company follows in all its operations and administration.

## Board of Directors

The Board of Directors, elected by the General Meeting, is responsible for the administration and appropriate organisation of Nitor's operations. According to Nitor's Articles of Association, the Board must have between 5 and 8 members.

The Board currently consists of six members, of whom three are independent, meeting the requirement of at least 1/3 independence under the Finnish Corporate Governance Code. The Board has an equal gender balance with three female and three male members. The Board does not have employee representatives.

Under the Finnish Companies Act, the Board is responsible for the overall management of the company's business and the appropriate organisation of its operations, including oversight of financial performance and risk management. In practice, the Board's work at Nitor focuses on securing the company's long-term continuity, approving strategy, and ensuring appropriate governance and compliance.

Sustainability is part of Nitor's overall strategy and long-term goals, reflecting the kind of company we want to be. The Board oversees ESG performance as part of its annual review cycle, providing guidance, setting goals, and reviewing performance metrics.

## CEO and the Leadership Team

The CEO is responsible for the day-to-day operational management of Nitor in accordance with the Finnish Limited Liability Companies Act, supported by a Leadership Team of five members, one female and four male, who collectively oversee strategy execution and all key business functions.

The Leadership Team's daily work is organised through four steering teams: Administration, Commercial, People and Technology. Decisions are made within the steering teams where sufficient authority exists, and escalated to the CEO or Leadership Team where needed. Members may participate in more than one steering team, reflecting the cross-functional nature of their roles.

Following the ramp-down of the Extended Leadership Team at the end of 2025, greater clarity and structure has been brought to both the Leadership Team and the steering teams, sharpening accountability and ensuring that decision-making is anchored at the right level across the organisation.

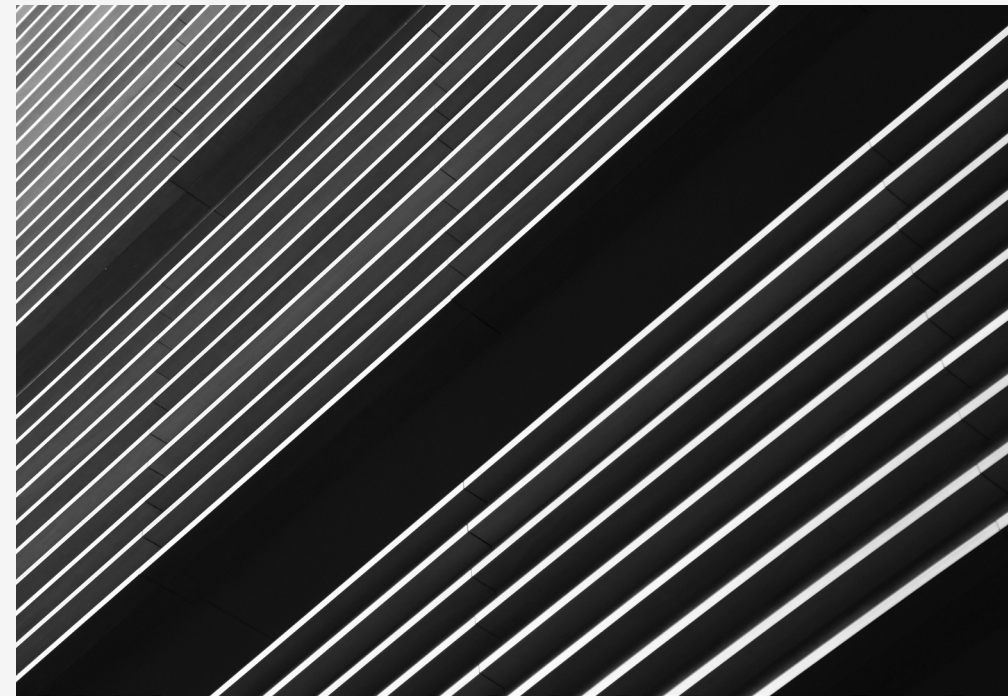
Sustainability coordination and reporting are managed within the Administration steering team, which also oversees finance, legal, IT, risk management and other back-office functions across Nitor.

Day-to-day management of sustainability is led by the Director, Sustainability, with material ESG topics overseen across the relevant steering teams. The Leadership Team holds direct responsibility for all material ESG topics, with decisions on material impacts, risks and opportunities, including any trade-offs between sustainability and business objectives.

The Leadership Team ensures that appropriate sustainability and ESG-related skills and expertise are available and continuously developed.

## Integration of sustainability-related performance in incentive schemes

Nitor currently does not have incentive schemes for members of the Board of Directors or the Leadership Team that are linked to sustainability-related targets or metrics.



## Statement on due diligence

Nitor's approach to sustainability due diligence is integrated into its governance structure and day-to-day operations. The following describes where the main steps of the due diligence process are reflected in this Report.

### **Embedding due diligence in governance, strategy and business model**

The governance structure and the responsibilities of the Board of Directors and Leadership Team regarding sustainability are described in GOV-1. The integration of material sustainability impacts, risks and opportunities into strategy and business model is described in SBM-1 and SBM-3.

### **Engaging with affected stakeholders**

Nitor's approach to identifying and engaging with stakeholders whose interests are affected by its operations is described in SBM-2, including how key stakeholders' views inform strategy and business model.

### **Identifying and assessing negative impacts on people and the environment**

The process through which Nitor identifies and assesses actual and potential negative impacts on people and the environment is described in IRO-1. The outcomes of this assessment, including the material impacts, risks and opportunities identified, are presented in IRO-2.

### **Taking action to address negative impacts**

The key actions Nitor has taken or planned to prevent, mitigate or remediate negative impacts are described in the relevant topical disclosures of this Report.

### **Tracking the effectiveness of these efforts**

Nitor monitors the effectiveness of its actions through metrics and targets set in relation to its material topics, as described in the relevant topical disclosures. Progress towards targets is reviewed annually as part of the Board's annual review cycle, as described in GOV-1.

### **Risk management and internal controls over sustainability reporting**

Nitor has a risk management framework that addresses sustainability-related risks and internal controls for sustainability reporting. Sustainability risks are part of the overall risk management process and handled through the same practices as all other risks. The framework follows ISO 31000:2018 and guidelines from Suomen Riskienhallintayhdistys, tailored to fit Nitor's operational model.

Risk identification includes both internal and external sources. It captures events, causes, and consequences across all areas of operations. Identified risks are assessed with a documented scoring method based on likelihood and impact. These are evaluated against set risk criteria and assigned to owners for action. The Board of Directors reviews the overall risk situation at regular intervals and the risk register is updated as context evolves.

Nitor's internal control processes for sustainability reporting aim to ensure the completeness, integrity, and accuracy of the reported information. A responsible owner collects sustainability data using a documented process based on a defined list of metrics and their sources. Specific tools and systems consistently collect and manage sustainability data across reporting periods. External verification offers extra assurance regarding the reported information.

Nitor's risk management and internal control processes rely on relevant policies. The Risk Management Policy outlines the principles and requirements for risk management throughout the organisation. It provides a shared approach for identifying, evaluating, and handling risks. The Environmental Policy details Nitor's commitment to reducing environmental impacts and continuously improving environmental performance.

# Strategy

SBM-1, SBM-2, SBM-3

## Strategy, business model and value chain

Nitor is a digital engineering company that builds sustainable digital solutions together with its customers. Nitor helps businesses build scalable, business-critical systems and identify lasting digital strategies.

Nitor's services are structured around three areas: Think, covering strategies that connect the customer, technology and AI; Build, covering products and solutions that drive sustainable digital success; and Care, covering continuous development, security and 24/7 support.

Nitor Group Oy operates solely in Finland, with offices in Helsinki and Tampere. The company has two subsidiaries, Nitor Creations Oy and Nitor Care Oy. During 2025, Nitor scaled down its business in Sweden, and the two former subsidiaries, Nitor Delta Oy and Nitor Insight Oy, were integrated into Nitor Creations Oy.

The company serves mostly private-sector customers across a broad range of industries, including retail, financial services, media and technology, with no significant changes in customer groups during 2025. Nitor's net sales for 2025 amounted to EUR 40 million.

As a digital engineering company, Nitor's upstream value chain consists primarily of SaaS providers and software licence suppliers, whose tools and platforms underpin the solutions Nitor builds. Downstream, Nitor delivers digital solutions to its customers, whose end-users interact with those solutions in their everyday lives. Nitor's position in the value chain is therefore that of an enabler, sitting between technology providers and the end-users of the digital solutions it helps create.

As part of its strategy, Nitor has set sustainability targets at the Group level covering environmental, social and governance topics, as described in the relevant topical disclosures of this Report.

## Interests and views of stakeholders

Nitor engages regularly with its key stakeholders to understand their interests and views, and to ensure that these inform its strategy, business model and sustainability work. Stakeholder engagement is integral to the approach to identifying and managing material impacts, risks and opportunities.

Nitor's two most important stakeholder groups are its own employees and its customers. Our people are at the heart of the business, and their well-being, development and experience directly shape our ability to deliver on our strategy and sustainability ambitions. We maintain open dialogue between management and employees through regular events, including cultural bi-weeklies and monthly all-hands meetings, and track employee experience through monthly pulse checks, quarterly surveys, and an annual employee survey.

Our customers are the reason we exist, and understanding their needs, expectations and views drives how Nitor develops its services and builds long-term partnerships.

Key account managers maintain continuous dialogue with all customers throughout the year, ensuring that needs and expectations are understood and addressed on an ongoing basis. Customer satisfaction is measured annually through an independent survey conducted by Onway on Nitor’s behalf.

Beyond these two core groups, Nitor maintains active engagement with subcontractors and other suppliers and technology partners, as well as broader interaction with organisations, communities and regulatory authorities. These engagements serve to understand stakeholder expectations, identify emerging sustainability-related

matters, and build long-term relationships. Insights gathered through these interactions are channelled into the company’s double materiality assessment and strategy and business planning processes, and are reported to leadership and the board.

Our stakeholders	ENGAGEMENT	OUTCOME
Employees	Regular face-to-face one-on-one discussions through dedicated F2F responsables. Monthly pulse surveys, quarterly eNPS surveys and an annual employee survey. Biweekly cultural meetings and monthly all-hands sessions are open to employees.	Skilled, motivated and well-supported people are our most important resource. We are committed to building a low-hierarchy, dialogue-based culture where every voice is heard, feedback is acted upon, and people can grow and thrive.
Management	Leadership Team meetings covering operational reviews, strategic discussions and decision-making. Steering teams covering Admin, Commercial, Technology and People, each with a defined focus area and ownership.	Clear leadership structures and regular decision-making cycles ensure that strategic priorities are translated into action and that the business develops in a focused and agile way.
Board of Directors	Regular board meetings covering strategy, financial performance and governance. Subject-matter experts are invited to present on specific topics in accordance with the annual cycle and as needed.	Sound governance and strategic oversight ensure long-term accountability and sustainable company development. The Board’s broad perspective and expertise strengthen the quality of decision-making at the highest level.
Shareholders	Regular financial and strategic reporting. Annual general meetings and ongoing direct dialogue with owners to ensure transparency and alignment on company direction and long-term development.	Open and transparent communication ensures that shareholders have accurate and timely insight into the company’s strategy, performance, and long-term development, supporting informed ownership decisions.

Our stakeholders	ENGAGEMENT	OUTCOME
Customers	Close collaboration across the full service lifecycle, from development and implementation to maintenance and continuous improvement. Regular dialogue through sales, marketing and customer service teams. Customer experience is measured annually by a third party through surveys, interviews and assessments.	The further development of services and customer experience is at the heart of everything we do. We co-create solutions that meet real customer needs, deliver lasting value and help customers solve their most important challenges.
Ecosystem companies	Regular joint meetings and strategic dialogue to align on shared priorities. Collaborative development initiatives and go-to-market cooperation. Ongoing operational coordination to ensure smooth delivery and mutual accountability.	A strong and collaborative ecosystem amplifies our collective capabilities and creates business opportunities that neither party could achieve alone. We grow together with our partners.
Suppliers and subcontractors	Active supplier network development. Commitment to Supplier Code of Conduct. Regular supplier surveys and audits of selected suppliers as needed.	Responsible and reliable supply chains are a prerequisite for quality delivery and sustainable business. We actively manage risks and hold our supplier network to the same standards we set for ourselves.
Technology partners	Participation in partner programs, training, certifications, and industry events. Regular meetings, workshops and joint development initiatives.	Staying at the forefront of technology developments and continuously building competence enables us to identify new opportunities and deliver better, more future-proof solutions for our customers.
Authorities and regulators	Proactive engagement through reporting obligations, consultations and industry-level discussions. Monitoring of the regulatory landscape to anticipate changes and contribute constructively to relevant policy development.	We ensure compliance and follow regulatory developments closely, anticipating changes that may affect our business and industry.
Organisations and communities	Participation in selected industry organisations, working groups and communities of practice. Collaboration through joint initiatives and knowledge-sharing forums relevant to the technology sector and information society.	We share and develop industry knowledge and best practices, and strengthen our role in the broader technology sector. We believe in contributing to the development of a responsible and thriving information society.

## Interaction of material impacts, risks and opportunities with strategy and business model, and financial effects

Nitor's material impacts arise both directly from its own operations and indirectly through the digital services it provides to customers. While these impacts are less visible than in traditional industries, they can be significant, shaping how services are accessed, how data is handled, and how technology supports sustainable outcomes. Through its work across various industries, Nitor contributes to broader societal goals such as digital inclusion, privacy protection and long-term operational resilience.

Nitor's strategic response to its material topics is reflected in the actions taken and planned across the organisation. Regarding climate, Nitor has committed to the Science Based Targets initiative and is developing an emission reduction plan during 2026 to support validation of its targets. On business conduct, the new governance model, updated policies, and the establishment of the AI Culture Team reflect deliberate decisions to strengthen ethical conduct and responsible AI use. On consumers and end-users, investments in information security, AI governance, and accessibility capabilities are integral to how Nitor positions itself as a trusted digital partner.

The rapid development of AI offers both opportunities and risks, reshaping IT services and opening new business avenues while also threatening existing models. Nitor's strategic response to AI is being developed during 2026. Beyond AI, no significant financial impacts related to material risks or opportunities were identified in the current period, and no major changes in performance or financial position are observed or expected.



# Impacts, risks and opportunities management

IRO-1, IRO-2

## Description of the process to identify and assess material impacts, risks, and opportunities, and material information to be reported

Nitor's first double materiality assessment was conducted in 2024, based on EFRAG guidance, and was updated in 2025. It covered impacts on people and the environment as well as financial risks and opportunities affecting company's performance.

The assessment focused primarily on the company's own operations. The upstream and downstream value chain was considered at a general level, with no material impacts, risks or opportunities identified beyond those arising from Nitor's own operations. Nitor does not operate in high-risk countries or sectors, and no business relationships are deemed to hold heightened risks of negative impacts.

We used the list of topics and sub-topics from Appendix A of ESRS 1, based on the 2025 Draft Simplified European Sustainability Reporting Standards (ESRS). It was used as a non-binding input to draft a preliminary list of material topics, focusing mainly on those identified in 2024.

These updates did not affect the overall conclusions of the materiality assessment. The process incorporated existing data on sustainability themes, plans and external sources of information about sustainability practices typical for IT and digital services companies.

In the 2024 assessment, negative impacts were evaluated for severity, scope, likelihood and irremediability, and positive impacts for scale, scope and likelihood. Financial risks and opportunities were assessed using likelihood and magnitude as criteria. All topics were scored on a scale of one to five, consistent with Nitor's risk management

process, and analysed for both impact and financial significance with a focus on their interrelationship. The 2025 update refined these results through a relative ranking approach and qualitative judgement applied by the sustainability experts conducting the assessment, without altering the overall conclusions. A total of 11 material topics were identified. The material sustainability topics were reviewed and approved by Nitor's management team.

The process involved leadership and key business functions, with two Board members and a customers representative providing external perspectives. The Leadership Team reviewed the final material sustainability topics. All affected stakeholders were not directly consulted as part of the process, with their perspectives reflected indirectly through existing data and the customers representative's input. No external sustainability experts were engaged in the process.

Prevention, mitigation and remediation of identified negative impacts are managed through Nitor's risk management process, which aligns with ISO 31000:2018 standard. New material risks are added to the risk register with appropriate actions, owners and timelines. Key themes from the double materiality assessment are incorporated into the framework and reviewed annually, or more frequently if significant changes occur in the operating environment or business.

The assessment examined material topics in greater detail at the sub-topic level, providing a more accurate picture of the materiality of each impact, risk and opportunity and enabling more systematic prioritisation. Short, medium and long-term time horizons as defined in ESRS 1 were considered in the assessment, though not formally applied.

As part of continuous improvement, Nitor plans to conduct a climate scenario and resilience analysis in line with recognised frameworks. This has not yet been carried out during the current reporting period.

## Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement

The content of the Report is based on a double materiality assessment updated in 2025, identifying material sub-topics within Climate Change (E1), Own Workforce (S1), Consumers and End-users (S4), and Governance (G1). All mandatory data points within material topics have been reported in full.

In the 2025 update, Nitor confirmed that material sustainability topics remain within the same four ESRS standards as in 2024, with minor changes to specific sub-topics reflecting a more refined understanding of impacts, risks, and opportunities. The assessment applied the November 2025 draft of the Simplified ESRS standards, which introduced minor updates to the topic list including some changes in naming and combining of topics, without affecting the overall conclusions of the materiality assessment.

The following topics were assessed as not material and are therefore not included in this Report: ESRS E4 Biodiversity and Ecosystems, ESRS S2 Workers in the Value Chain, and ESRS S3 Affected Communities.

The material impacts, risks and opportunities identified through the 2025 double materiality assessment are described in the topic-specific sections of this Report, covering Climate Change (E1), Own Workforce (S1), Consumers and End-users (S4), and Governance (G1). Each section includes the relevant disclosure requirements, policies, actions, metrics and targets applicable to that topic.

Nitor manages its material sustainability topics through policies, actions, metrics and targets across all environmental, social and governance areas covered in this Report. Policies have been adopted to manage each material sustainability topic, defining commitments, scope and application. Key actions have been implemented and appropriate financial and human resources allocated, covering both preventive and corrective measures. Performance is tracked through metrics that measure the effectiveness of policies and actions, and targets have been set at Group level to drive progress and ensure accountability, with definitions and progress presented in the relevant sections of this Report.

## Double materiality assessment

<b>Impact materiality</b> Impact on society and environment	<b>Significant</b>	Social dialogue Climate change mitigation	Training and skill development Corporate culture Diversity and equal treatment
	<b>Moderate</b>	Health and safety Social inclusion of end-users Energy	Climate change adaptation Informational impacts of end-users Working conditions and terms of employment
		<b>Moderate</b>	<b>Significant</b>
		<b>Financial materiality</b> Impact on Nitor	

# Climate change

## Environment

Digital services have a real environmental footprint. We are committed to reducing ours, setting science-based climate targets, and making choices in our everyday work that add up to real impact over time.

# Data-driven climate action

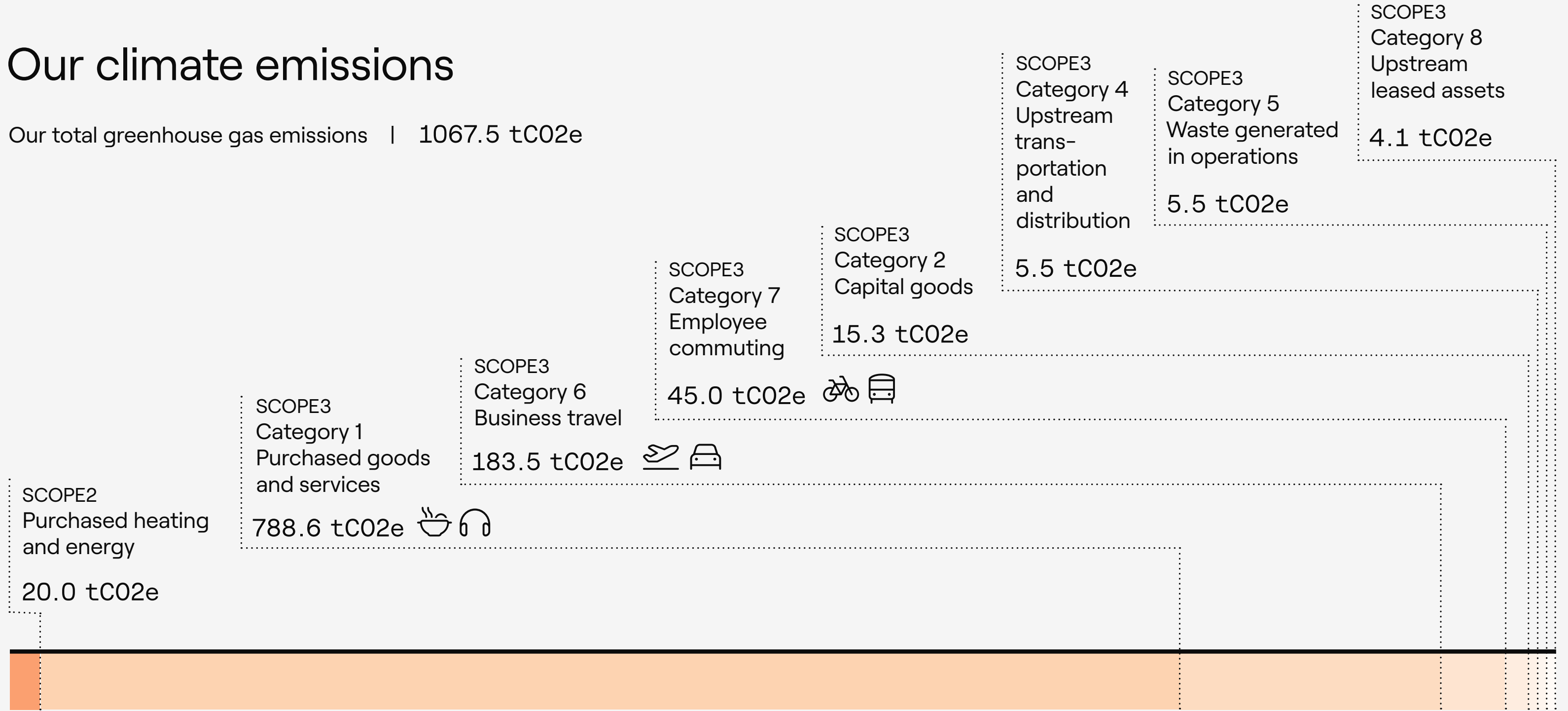
For Nitor, climate change is as much a business issue as an environmental one. Our approach is built on data. Accurate, granular emissions tracking is the basis of credible climate action and increasingly a valuable business asset in itself. As we develop more visibility into our value chain emissions, we strengthen our position for supplier engagement and create a more transparent story for our customers and other stakeholders.

We are committed to reducing our emissions through a credible and structured transition plan, which is currently being developed and is scheduled to be completed in 2026. Central to this is our commitment to the Science Based Targets initiative, through which we will establish near-term and net-zero targets covering all emission scopes. This provides our climate ambition with a scientifically grounded foundation and a clear route forward.



# Our climate emissions

Our total greenhouse gas emissions | 1067.5 tCO<sub>2</sub>e



● SCOPE 1 | 0 % | 0.0 tCO<sub>2</sub>e

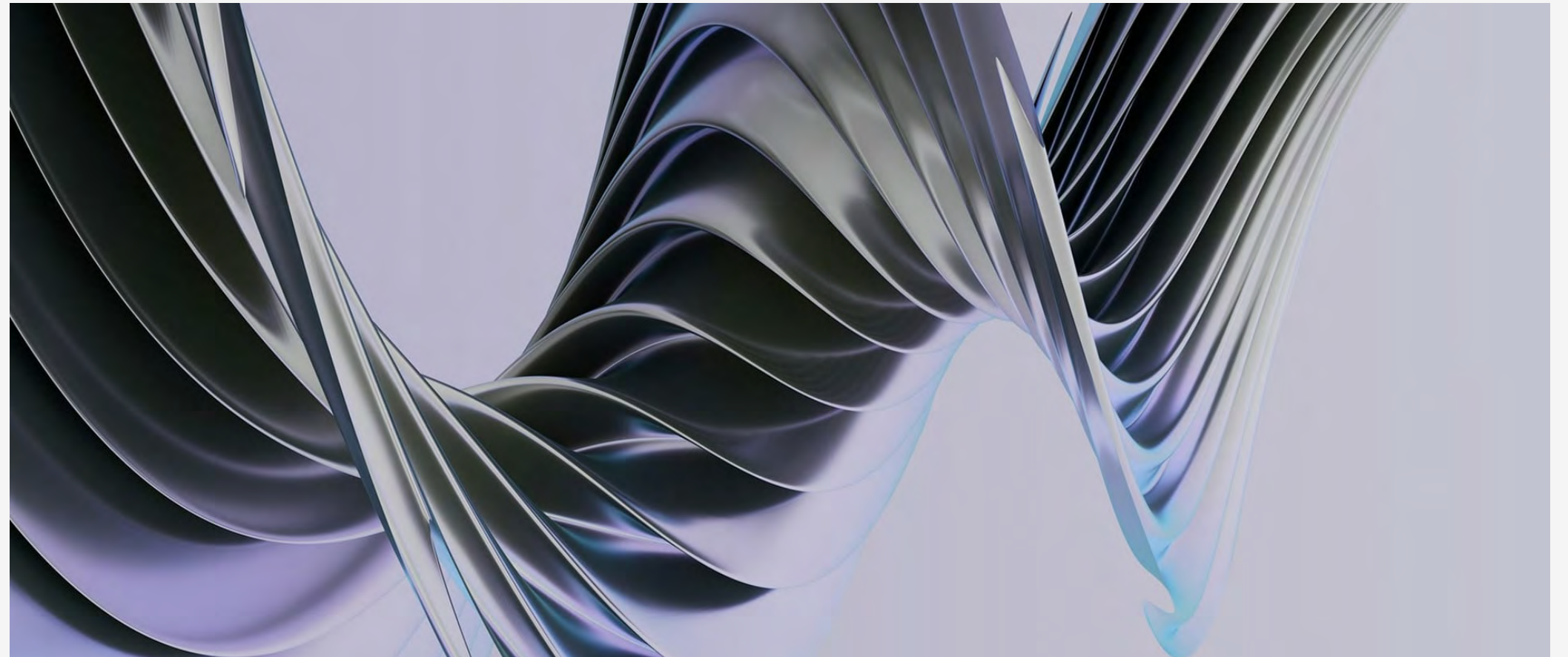
● SCOPE 2 | 1,9 % | 20.0 tCO<sub>2</sub>e

● SCOPE 3 | 98,1 % | 1047.5 tCO<sub>2</sub>e

# Climate-related impacts, risks and opportunities

IRO-2

Climate change creates both risks and opportunities for Nitor's business. Through our double materiality assessment, we have identified the climate-related impacts, risks and opportunities that are most relevant to our strategy, business model and value chain. As a digital consultancy, our most significant climate impact stems from emissions across the digital value chain, while our cloud and data expertise creates tangible opportunities to improve energy efficiency and develop low-carbon solutions for our customers.



TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
<p><b>Climate change adaptation</b> We develop solutions that support readiness for climate-related risks and improve operational continuity. Through this, we strengthen both ours and our customers’ business resilience.</p>	<p>–</p>	<p><b>🔍 FINANCIAL OPPORTUNITY:</b> <b>Strengthening competitive advantage by leading in climate adaptation.</b> Developing data-driven and low-carbon digital solutions strengthens our competitive position. The solutions help customers prepare for climate-related risks, while building the internal capabilities needed for timely, high-quality delivery.</p> <p><b>⚠️ FINANCIAL RISK:</b> <b>MEETING THE EVOLVING CUSTOMER DEMAND</b> Insufficient development of competencies and offerings to meet the increasing customer demand for digital solutions that support climate adaptation may lead to lost sales opportunities and reduced competitiveness.</p>
<p><b>Climate change mitigation</b> Reducing emissions from our own operations and the value chain while recognising the impacts of digital services, decreases our climate impacts and supports customers in achieving their climate goals.</p>	<p><b>⬆️ POTENTIAL POSITIVE IMPACT: EMISSIONS REDUCTION</b> Commitment to science-based climate targets (SBTi) and more accurate emissions accounting provide the tools to understand and reduce our climate impact and to support our customers’ climate goals.</p> <p><b>⬇️ ACTUAL NEGATIVE IMPACT: EMISSIONS FROM DIGITAL SERVICES</b> The emissions associated with digital services are hard to quantify, and rising energy use from AI and cloud is contributing to worsening climate impacts of the digital value chain, which we are part of.</p>	<p>–</p>
<p><b>Energy</b> Reducing energy consumption, enhancing energy efficiency, and utilising renewable energy lessen the environmental impacts of our operations.</p>	<p><b>⬆️ ACTUAL POSITIVE IMPACT: RESPONSIBLE ENERGY SOLUTIONS</b> Energy-efficient solutions in premises, the use of renewable energy, and continuous improvement guided by the environmental management system support the efficient use of energy in both the short and medium term and help reduce our environmental impact.</p>	<p>–</p>

# Transition plan for climate change mitigation

E1-1

Nitor is developing a climate transition plan that aligns our strategy and business model with the goals of the Paris Climate Agreement, with completion and publication planned in 2026. The transition plan will focus on improving data accuracy, engaging with suppliers, and identifying effective emission reduction opportunities throughout the value chain. Nitor has committed to the Science Based Targets initiative (SBTi) and is working towards formal submission of near-term and net-zero targets covering Scopes 1, 2 and 3 by the end of 2026.

## Our Science Based Targets -journey

- Committed 2024
- Base year 2025
- Near-term emission targets by end of 2026
- Net-zero emission targets by end of 2026

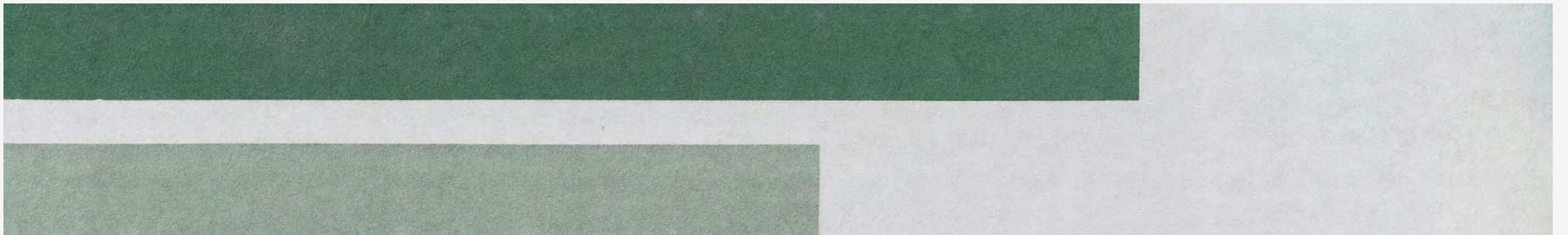
# Climate-related risks, scenario analysis and resilience

E1-2, E1-3, E1-11

Nitor has not yet conducted a climate scenario analysis or a formal resilience assessment of its strategy and business model. The need for both was identified during the double materiality assessment, and we are evaluating suitable methodologies and data availability to support future scenario-based planning.

Given Nitor's business model as a digital consultancy, its direct exposure to physical climate risks is limited. Indirect risks such as climate-related disruptions to energy supply or cloud infrastructure may impact service continuity and are addressed within broader risk management and business continuity frameworks. As no material climate-related

physical or transition risks have been identified for Nitor's business operations, no assessment of anticipated financial effects has been carried out.



# Policies related to climate change mitigation and adaptation

E1-4

Nitor's environmental policy sets out our principles on climate change mitigation, energy efficiency, and the transition to renewable energy. The policy commits Nitor to reducing greenhouse gas emissions, transitioning to 100% renewable energy across our operations, and continually improving energy efficiency. It also reflects our commitment to the Science Based Targets initiative.

The environmental policy applies to the entire Group and is supported by Nitor's Code of Conduct, which encourages environmentally responsible behaviour both in business operations and the workplace, and sets expectations for contractors and partners to act accordingly.



# Actions and resources in relation to climate change mitigation and adaptation

E1-5

In 2025, Nitor adopted a more data-driven approach to climate action. Our new financial management system provides detailed procurement and supplier data, supporting our gradual transition from spend-based estimations towards more precise distance-based and supplier-specific calculations. This improves the accuracy of our Scope 3 tracking and strengthens the validity of our emissions data over time.

Nitor's environmental management system is based on the WWF Green Office framework, which covers waste management and recycling, water preservation, and environmentally friendly travel and purchasing practices, guiding our efforts to reduce the environmental impact of operations and promote sustainable digital services. The system was certified in 2023 and a re-certification is scheduled for Q1 2026.

The GHG Inventory Management Plan defines the methodology, boundaries, data sources and quality controls applied in our emissions calculations, based on the GHG Protocol Corporate Standard and the operational control approach. It governs the use of calculation methods, including spend-based estimations, activity-based data and supplier-specific emission factors. Internal carbon pricing is not currently applied as part of Nitor's emissions management approach.

Nitor is transitioning from spend-based to supplier-specific emission factors for key procurement categories. This shift, enabled by our new financial management system, allows for more accurate tracking of supply chain emissions and lays the groundwork for targeted supplier engagement in future periods. As this transition is ongoing, quantified emission reductions are not yet available but are expected

to become measurable as supplier-specific data coverage increases.

Nitor promotes responsible use of digital resources as part of its sustainable digital services approach. Current actions include optimising software and cloud resource efficiency to minimise unnecessary energy consumption, and applying circular economy principles to IT hardware through responsible disposal and extended equipment lifecycles. These practices reduce the emissions associated with hardware production and cloud infrastructure use. Quantified reductions will be tracked as data collection methods develop.

Nitor's GHG emission reduction targets are currently under development. In parallel, Nitor has initiated work on an emission reduction action plan, which aims to cover all

emission sources and activities. This work is in its early stages, and both the targets and the action plan will be disclosed in more detail once formally adopted.

In 2025, no separate budget was established for climate-related actions, and related activities were carried out as part of ordinary operations without distinct financial tracking. For 2026, Nitor has established a dedicated climate action budget for the first time. The allocated resources are modest in scale, primarily covering sustainability reporting. The implementation of planned actions does not depend on external funding, grants, or specific public policy developments.

Nitor supports climate and nature-related objectives through Beyond Value Chain Mitigation (BVCM) activities, as encouraged by SBTi. While these actions do not contribute to science-based target achievement, they reflect our commitment to broader climate responsibility beyond our value chain.

Based on 2024 greenhouse gas emissions, Nitor donated a total of €20,000 in 2025 to support environmental protection, with €10,000 going to the John Nurminen Foundation for Baltic Sea conservation and €10,000 to the Finnish Natural Heritage Foundation for the protection of Finnish forests. The Natural Heritage Foundation used its share to extend a protected nature reserve in the Luhdanjoki area in Hollola. Through these contributions, Nitor aims to make a tangible positive impact on ecosystems and biodiversity beyond its core digital engineering operations, and we plan to continue this approach in 2026.

# Targets related to climate change

E1-6

Nitor has not yet established formal climate-related mitigation or adaptation targets. However, we are committed to developing science-based targets aligned with the Science Based Targets initiative (SBTi), with formal submission planned during 2026.

The 2025 reporting year serves as the baseline for our emissions data, against which future progress will be measured once targets are validated. The targets will include both near-term and net-zero objectives covering Scopes 1, 2, and 3, and will guide our decarbonisation efforts going forward.



# Energy consumption and mix

E1-7

Nitor's total energy consumption relates to its office operations. The majority of energy consumed comes from district heating, which relies partly on non-renewable energy in the district heating network. The remaining share consists of purchased electricity and cooling, sourced from renewable energy. Nitor does not produce energy and has no nuclear energy consumption.

**Table 1:** Energy consumption and mix

TYPE	ENERGY USAGE	%
Energy from non-renewable sources	146.10 MWh	77.2%
Energy from nuclear sources	0.00 MWh	0.0%
Energy from renewable sources	43.13 MWh	22.8%
Total energy consumption	189.23 MWh	–

# Gross scope 1, 2 and 3 GHG emissions

E1-8

Nitor reports its greenhouse gas emissions according to the GHG Protocol Corporate Standard, utilising the operational control approach to establish the reporting boundaries. The consolidated emission calculations are done at group level, including all our subsidiaries.

Scope 1 emissions are zero as Nitor does not operate facilities that produce direct emissions. Scope 2 emissions are low due to the use of renewable energy. The majority of emissions fall under Scope 3, covering activities throughout the upstream and downstream value chain.

Scope 3 emissions were calculated following the GHG Protocol Corporate Value Chain (Scope 3) Standard, using a mix of spend-based estimations, activity-based data, and secondary emission factors from recognised sources. The emission factors applied are sourced from DEFRA (2025), EXIOBASE (2020), and supplier-specific data provided by Carbon Wise and KPF Lakitoimisto (2024).

The emission calculations and emission factors used have been externally audited, with an independent audit report as verification of the methodology and data applied.

**Table 2:** Gross Scopes 1, 2, 3 and Total GHG emissions - GHG emissions per scope

TYPE	GHG EMISSIONS	%
GHG emissions scope 1	0.00 tCO2e	0.0%
GHG emissions scope 2 location-based	19.01 tCO2e	
GHG emissions scope 2 market-based	20.02 tCO2e	1.9%
GHG emissions scope 3	1047.44 tCO2e	98.1%
GHG emissions total (market-based)	1067.45 tCO2e	

**Table 3:** Gross Scopes 1, 2, 3 and Total GHG emissions - Scope 3 GHG emissions (GHG Protocol)

TYPE	GHG EMISSIONS (tCO2e)	%
1. Purchased goods and services	788.55	75.3%
2. Capital goods	15.03	1.5%
3. Fuel- and energy-related activities	0.0	
4. Upstream transportation and distribution	5.46	0.5%
5. Waste generated in operations	5.49	0.5%
6. Business travel	183.52	17.5%
7. Employee commuting	44.98	4.3%
8. Upstream leased assets	4.14	0.4%
9. Downstream transportation and distribution	0.0	
10. Processing of sold product	0.0	
11. Use of sold products	0.0	
12. End-of-life treatment of sold products	0.0	
13. Downstream leased assets	0.0	
14. Franchises	0.0	
15. Investments	0.0	



# Our people

## Social

When people feel trusted, supported, and encouraged to grow, they produce work that matters. We invest in our people's well-being, sustainable workloads, and skill development because that's where lasting value begins.

# Well-being through a sustainable pace

At Nitor, employee well-being is not managed through separate programs, but through consistent, everyday practices that reflect our core values. Our people are key to our business success, and we are committed to maintaining a healthy, fair, and inclusive work environment where individuals can thrive and work at a sustainable pace.

To ensure both the well-being of our employees and the success of our projects, we invest heavily in training, skills development and knowledge sharing.



# Own workforce-related impacts, risks and opportunities

IRO-2

Based on the conducted double materiality assessment, Nitor's material impacts, risks, and opportunities related to its workforce include secure employment, social dialogue, work-life balance, health and safety, gender equality and equal pay, training and skills development and diversity. Key risks include failure to address work-life balance and health impacts. Key opportunities are communication culture, gender representation and inclusive workplace. The employees are the core of Nitor's business, and their well-being, happiness, and sustainable working pace are the most critical factors when developing these matters.

Nitor recognises potential negative impacts, particularly relating to gender bias and unequal inclusion, which reflect broader systemic inequalities. These challenges underline the need to promote a diverse, inclusive, and equitable workplace. On the positive side, Nitor's workforce benefits from strong talent retention, workplace well-being, professional growth opportunities, and a sustainable pace of work. There are no significant risks of child or forced labour in our operations.

The table summarises the material own workforce related impacts, risks, and opportunities (IROs) and describes their interaction with Nitor's strategy, business model, operations, and value chain.

TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
<p><b>Training and skills development</b></p> <p>A skilled, continually developing workforce is essential for business success and for meeting customers expectations for high-quality expertise and forward-thinking professional insight.</p>	<p><b>↑ ACTUAL POSITIVE IMPACT: SHARING EXPERTISE</b></p> <p>Supporting self-directed skills development enhances our consultants' professional growth and encourages ongoing development.</p>	<p><b>+ OPPORTUNITY: STRONGER POSITIONING THROUGH THOUGHT LEADERSHIP</b></p> <p>Strong expertise, acting as a frontrunner, and introducing new perspectives reinforce our position as a trusted adviser and potentially unlock new business opportunities.</p> <p><b>⚠ RISK: FAILING TO MEET CUSTOMERS NEEDS DUE TO MISALIGNED SKILLS DEVELOPMENT</b></p> <p>Insufficient communication of skill requirements and unclear strategic direction may result in misaligned competence development, limiting our capacity to meet evolving customers needs and weakening our ability to deliver value.</p>
<p><b>Diversity and equal treatment</b></p> <p>Open, two-way, and actively inclusive communication between employees and management ensures that employees have a genuine chance to be heard and influence decisions.</p>	<p><b>↑ ACTUAL POSITIVE IMPACT: COMMUNITY-ORIENTED CULTURE</b></p> <p>A supportive culture based on trust, openness, and mutual respect fosters a strong sense of community, well-being, and satisfaction at work. These elements strengthen open and inclusive dialogue among employees and between employees and management.</p>	<p><b>⚠ RISK: INCREASED TURNOVER RATE DUE TO INSUFFICIENT DIALOGUE</b></p> <p>As the organisation grows, fragmented communication, limited inclusiveness in dialogue, and low transparency in decision-making can reduce employee engagement and increase turnover, potentially affecting continuity and customer delivery.</p>

TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
<p><b>Social dialogue</b></p> <p>Open, two-way, and actively inclusive communication between employees and management ensures that employees have a genuine chance to be heard and influence decisions.</p>	<p><b>↑ ACTUAL POSITIVE IMPACT: COMMUNITY-ORIENTED CULTURE</b></p> <p>A supportive culture based on trust, openness, and mutual respect fosters a strong sense of community, well-being, and satisfaction at work. These elements strengthen open and inclusive dialogue among employees and between employees and management.</p>	<p><b>↓ RISK: INCREASED TURNOVER RATE DUE TO INSUFFICIENT DIALOGUE</b></p> <p>As the organisation grows, fragmented communication, limited inclusiveness in dialogue, and low transparency in decision-making can reduce employee engagement and increase turnover, potentially affecting continuity and customer delivery.</p>
<p><b>Working conditions and terms of employment</b></p> <p>The company’s growth and profitability lay the groundwork for stable employment and new job opportunities, while flexible practices support work-life balance.</p>	<p><b>↑ ACTUAL POSITIVE IMPACT: SUSTAINABLE PACE</b></p> <p>Maintaining a sustainable work pace and avoiding overload support employees’ daily well-being, enhance overall resilience, and enable sustained performance in changing circumstances.</p>	<p><b>+ OPPORTUNITY: ENHANCING TALENT RETENTION WITH GOOD WORKING CONDITIONS</b></p> <p>Stable working conditions and opportunities for professional development enhance talent retention and support business growth by enabling the long-term use of expertise to satisfy customer needs.</p>
<p><b>Health and safety</b></p> <p>A healthy workforce is a company’s most valuable asset; occupational health, workplace safety, and overall well-being are essential aspects of daily operations and long-term success.</p>	<p><b>↑ ACTUAL POSITIVE IMPACT: HOLISTIC WELL-BEING</b></p> <p>Investing in employees’ health, well-being, and comprehensive benefits fosters a supportive working environment and enhances employees’ resilience and long-term engagement at work.</p>	<p><b>↓ RISK: INCREASING DIRECT COST IMPACTS DUE TO WORK-RELATED HEALTH ISSUES</b></p> <p>Accumulated strain from work and personal life may reduce employees’ work ability and increase sickness absences, leading to direct cost impacts and resourcing challenges that affect business continuity.</p>

# Our policies and plans

S1-1

Nitor manages its material employee-related impacts, risks, and opportunities through a set of guiding policies and practices that apply to all employees. These policies include:

**Code of Conduct:** Nitor's Code of Conduct outlines our vision, values, and expectations for ethical behaviour, community, and personal conduct. It applies to all employees and is publicly available in English to ensure transparency.

**Labour Practices and Decent Work Policy:** This policy covers employment terms, working hours, absences, leave, holiday bonuses, and employee benefits, providing consistent, fair treatment and reducing the risk of overwork and inequity.

**Occupational Health Care Plan:** Developed with an occupational health care provider Terveystalo, this plan supports employee well-being and work-life balance by offering preventive health services and mental well-being support.

**Equality and Non-Discrimination Plan:** This plan promotes equal opportunities and a culture of respect and inclusion, addressing the risks of exclusion or bias based on characteristics such as gender, age, origin, disability, sexual orientation, beliefs, and other personal factors. Inclusion-related policies promote positive action for vulnerable groups, like gender and language minorities, creating a more welcoming and supportive workplace. Additionally, it supports gender balance in leadership and technical roles and fosters a culture of belonging, contributing to employee retention and engagement.

Nitor is committed to respecting human rights and labour standards, aligning with the UN Global Compact's Ten Principles and the UN Guiding Principles on Business and Human Rights. These commitments are reflected in our internal policies, promoting fair treatment, non-discrimination, and safe working conditions across all groups of affected stakeholders, including our own workforce, workers in the value chain, and the communities in which Nitor operates. Our policies explicitly prohibit child labour, forced or compulsory labour, and trafficking in human beings in all parts of our operations.

# Engaging with our people

S1-2

Employee feedback and input play a key role in making sure our people are engaged in daily decision-making. Dialogue and discussions take place through various internal communication channels and regular surveys that collect feedback on working conditions, well-being, and emerging issues. The insights gained from these surveys and continuous conversations are reviewed and lead to actions like updating policies, improving the workplace, and developing support programs.

Our People Team is responsible for ensuring consistent and effective employee engagement and support. People Steering team ensures insights from engagement activities are integrated into our strategic and operational decisions.

## Surveys and questionnaires

To ensure we capture the perspectives of our employees, including individuals from underrepresented groups, who may be particularly vulnerable to impacts or otherwise marginalised, we use a combination of anonymous monthly pulse surveys, an annual employee experience survey, and a

DEIB-specific questionnaire to monitor inclusion, well-being, and workplace experience. We also conduct a biannual Homefront survey to gather insights from employees' loved ones about how work-life balance and work environment are seen from the outside and surveys about learning and development to keep track about the needs for trainings or other resources.

For DEIB results specifically, a dedicated working group analyses the feedback and defines actionable steps, ensuring that lessons learned translate into meaningful actions. Additionally, our People team reviews monthly pulse surveys to analyse trends in employee satisfaction.

## Channels for dialogue

We engage with our people both directly and through employee representatives, holding open company meetings where they can provide input on various topics and projects. We actively foster our culture so that every employee has the opportunity to engage with management, either in person at the office or through other internal channels.

Individualised insight is gained through annual face-to-face sessions with employees' superiors, enabling person-focused dialogue around company direction and workplace evolution. Furthermore, the People team conducts 2-year anniversary interviews with every employee. In addition, Nitor's KAMU program, our internal peer-coaching program, provides employees with opportunities to raise issues in a supportive, confidential environment.

Bi-weekly culture meetings provide a space to raise concerns and comments about the dedicated themes supporting ongoing cultural development. Company-wide monthly meetings serve as our primary communication method, offering regular opportunities for employees to hear about ongoing matters.

Employee representatives actively participate in our Leadership Team and Steering Team meetings, ensuring that workforce perspectives inform our decision-making. The engagement occurs throughout key decision-making stages, particularly during planning and review phases of initiatives that may impact our employees.

## Channels to raise concerns

We emphasize a low-threshold culture of early intervention regarding potential negative impacts on our workforce, such as discrimination or challenges with workload. Our primary approach is to address issues proactively.

In potential cases of harassment or inappropriate behaviour, we encourage our employees to first contact their supervisor or our People team. For situations where anonymity is necessary, we maintain a monthly anonymous nVibe survey and an accessible Whistleblower channel on our public website. Additionally, our employees have access to third-party mechanisms for addressing well-being and workplace concerns through our occupational

healthcare provider Terveystalo, where they can participate in independent health surveys and access occupational health services. Our People team reviews all raised issues, directs them to the appropriate internal process, and monitors channel effectiveness through follow-up actions and employee feedback.

We foster a culture that emphasises psychological safety and trust, making it safer for our employees to speak up when needed. Concerns can also be raised directly with the People team, who handle them confidentially and sensitively. Our employee representatives also play a role in ensuring fair treatment and supporting individuals during the process. We do not tolerate retaliation of any kind.

# Our actions and targets

S1-3, S1-4

By fostering a culture of sustainable pace, we aim to help employees maintain a healthy work-life balance, supported by comprehensive benefits and extensive occupational health services for physical and mental well-being. Focusing on community building and individual support, we seek to establish a strong foundation for employee engagement.

Nitor Recognition – our peer recognition initiative, is one way to thank colleagues and share their great work to others. In 2025, 373 Nitor Recognitions were given from colleague to colleague. Employee happiness remains a central performance indicator, reinforcing both internal culture and customer satisfaction.

## People Strategy 2025–2028

2025 marked the first year of our new People Strategy for 2025–2028. This strategy sets out action plans to manage employee-related impacts, risks, and opportunities. It aims for an employee NPS score of 70, ensuring that no business unit falls below this benchmark, and an employee churn rate below 10%. In 2025, our employee NPS score was 56 with a response rate of 75%.

To ensure our initiatives deliver meaningful results, we monitor the data we gather, combining quantitative metrics with qualitative insights. Regular employee surveys form

the basis of our assessment strategy, complemented by detailed health and insurance analyses that offer objective measures of well-being outcomes. The employee retention rates serve as important indicators of workforce satisfaction and engagement.

## Workplace safety

Nitor’s workplace safety approach, although focused on a low-risk office environment, includes regular fire safety inspections, emergency preparedness, and collaboration with Terveystalo for preventive health measures. These practices ensure that the health and safety of employees are supported.

Nitor’s occupational safety and health committee comprises the Occupational Safety and Health manager, who is an employer representative, the Occupational Safety and Health representative, and two deputy representatives elected by the employees.

Nitor Recognitions were given from colleague to colleague

373

2025

## Fostering learning and development

Learning and development are firmly linked to work ability and motivation. Nitor is focused on pursuing material opportunities to enhance its people’s capabilities and align with emerging market direction.

Our investment in professional growth extends through various learning pathways, including the Academy - our competence development program, Core - the internal development program for experiential competence development, and the Mentoring Program, which create multiple avenues for continuous development and knowledge sharing. Our tracking extends across all these learning platforms, measuring not only training hours invested but also engagement levels across the programs. Additionally, certifications indicate successful professional growth.

As we explore emerging areas such as Composable Commerce, we have identified the need to upskill our employees in these evolving fields. Personal competence development plans are aligned with the knowledge required for future opportunities in AI, data, and software development. These initiatives reflect Nitor’s commitment to leveraging workforce potential to achieve financial opportunities through new technologies and business areas.

**Table 4:** Training and skills development indicators

TYPE	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees that participated in regular performance and career development reviews	40	196	0	0	236
Percentage of employees that participated in regular performance and career development reviews	16	80			96
Average number of training hours per person	N/A	N/A	N/A	N/A	61

Average training hours

61 h

2025

To recognise achievement and foster motivation, we've implemented incentive programs such as Nitor Recognition – our peer recognition initiative, certification bonuses, and annual Nitor Hall of Fame, which acknowledge our employees' contributions and successes in different levels.

In addition to the official programs, we're investing in specialised education programs like green software development and AI to prepare our employees with environmentally and ethically sustainable technology skills.

## Diversity, Equity, Inclusion and Belonging (DEIB)

Diversity, Equity, Inclusion, and Belonging (DEIB) onboarding is held for all new employees to share knowledge and embed inclusive practices.

Furthermore, Nitor collaborates with organisations such as Women in Tech and Inklusiiv to enhance diversity and inclusion at Nitor and throughout the tech industry.

Nitor implements specific procedures to prevent, mitigate, and act upon discrimination. The People team is responsible for the implementation of these procedures. Nitor's DEIB commitments are reinforced through accessible workplace designs, confidential reporting channels, and educational initiatives



## Managing negative impacts through timely feedback and responsive action

Our structured approach to identifying and addressing potential negative impacts relies on timely feedback and responsive action. We foster open communication and address tensions between business pressures and the need to prevent negative impacts on our employees. This is done through topic-specific forums, transparent dialogue and regular evaluation through surveys, helping to balance operational goals with employee well-being. Our People team facilitates business unit-specific reviews, which enable a swift response to emerging issues. To prevent negative

impacts, Nitor implements clearly defined actions and specific goals that minimise potential risks.

At Nitor, the COVID-19 pandemic led to a notable increase in sick leave, including mental health-related absences. To support employees, Nitor proactively promoted existing mental health services and increased communication about them. Ergonomic home-office equipment was added to Iron Bank, allowing Nitoreans to select their own work tools. Additionally, online events were increased to foster connections across the organisation. These initiatives have continued and contributed to sick leave returning to pre-pandemic levels by 2025.

In 2025, Nitor continued its partnership with Silta Education through the Focus Tiger programme. The six-week program offers employees practical tools based on neurophysiology to maintain focus in demanding work environments, supporting their cognitive well-being and resilience. In 2025, 41 employees participated in the programme.

The People Steering Team oversees the management of employee-related impacts, ensuring alignment with Nitor’s broader strategic goals. Additionally, the Nitor People team is directly involved in implementing and managing initiatives aimed at addressing material impacts on the workforce.

41

Nitoreans participated in the Focus Tiger programme to improve in maintaining focus in a demanding work environment

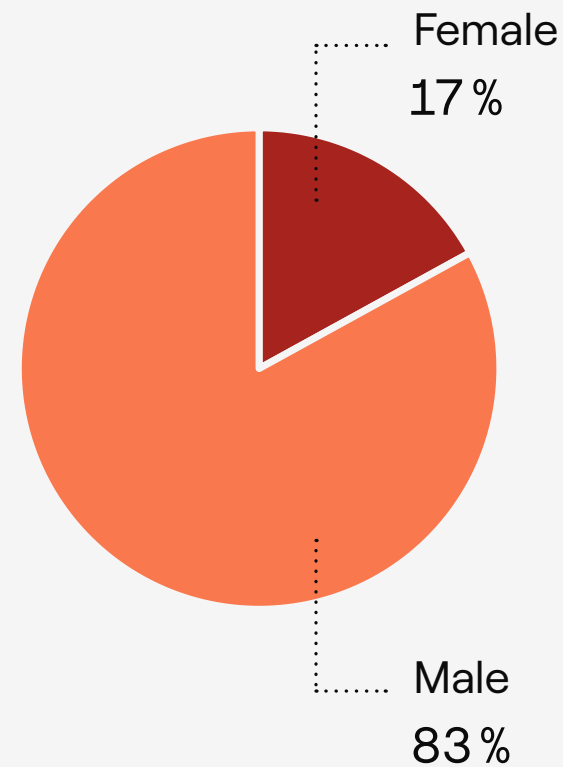
2025

# Who are we at Nitor?

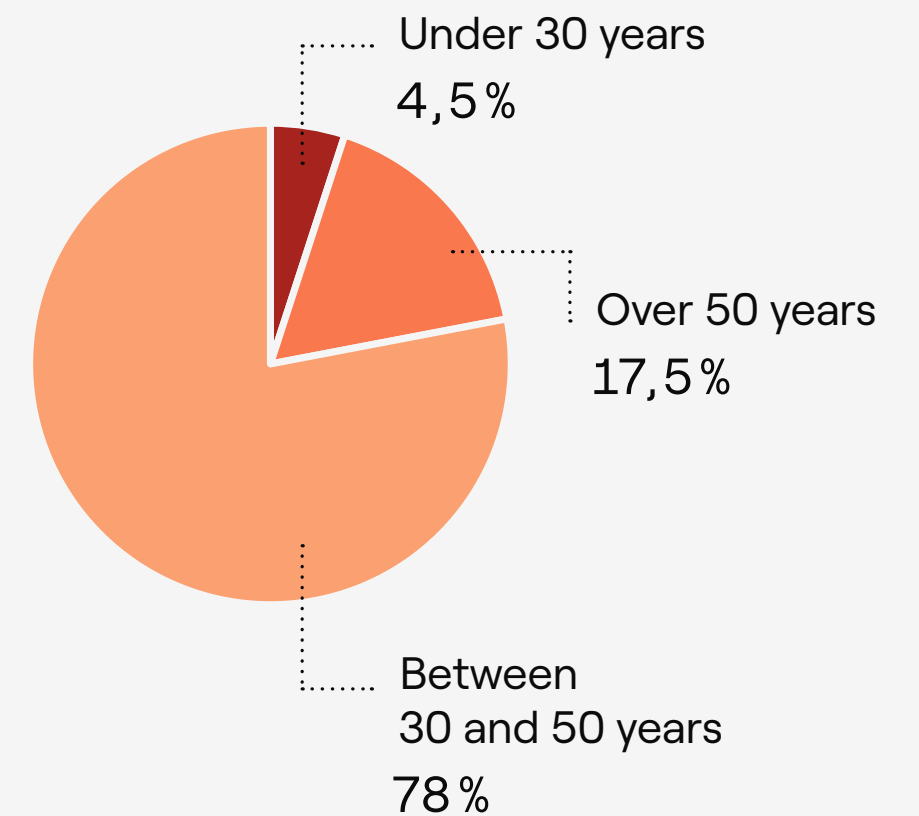
S1-5, S1-6, S1-8, S1-11

At the end of 2025, Nitor employed 246 people in Finland. Nitoreans come from a wide range of professional backgrounds, bringing together technical expertise, creative thinking, and strategic insight. They are a group of curious, skilled professionals who take pride in their craft and in each other. The following tables present a breakdown of our workforce by employment type, contract type, and gender.

**Our employees by gender**



**Our employees by age group**



**Table 5:** Our employees by gender

GENDER	NUMBER OF EMPLOYEES / HEADCOUNT
Female	41
Male	205
Other	0
Not disclosed	0
Total employees	246

**Table 6:** Our employees by countries

COUNTRY	NUMBER OF EMPLOYEES / HEADCOUNT
Finland	246

**Table 7:** Our employees by contract type

TYPE	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees (headcount / FTE)	41	205	0	–	246
Number of permanent employees (head-count / FTE)	40	202	0	–	249
Number of temporary employees (head-count / FTE)	1	2	0	–	3
Number of non-guaranteed hours employees (headcount / FTE)	0	0	0	–	0

During the reporting period, 28 employees departed from the company, resulting in an employee turnover rate of 9,4%. Nitor's workforce also comprised 48 non-employees. The most common types of non-employees were self-employed professionals and individuals engaged through subcontracting firms. These figures are presented using

a head-count method and represent the situation as of the end of the year. During the reporting period, no employees with disabilities were identified. This data is collected through voluntary self-reporting by employees, and data collection is subject to legal restrictions.

**Table 8:** Number of non-employees (S1-6)

TYPE	NUMBER
Number of non-employees in own workforce	48

**Table 9:** Distribution of employees by age group

TYPE	EMPLOYEES UNDER 30 YEARS OLD	EMPLOYEES BETWEEN 30 AND 50 YEARS OLD	EMPLOYEES OVER 50 YEARS OLD	TOTAL
Number of employees	11	192	43	246
Percentage of employees	4,5 %	78 %	17,5 %	

## Top management team

Nitor defines top management as the members of the Leadership Team, Service Unit heads and the steering teams. This includes the CEO and the heads of key business and operational areas. This definition differs from the default ESRS S1 definition of two levels below the administrative and supervisory bodies; given Nitor’s size and flat organisational structure, the Leadership Team is the level at which company-wide strategic decisions, financial oversight, and overall direction are determined.

**Table 10:** Top management level

TYPE	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees at top management level	5	19	0	0	24
Percentage of employees at top management level	21 %	79 %	0 %	0 %	–

Gender distribution of employees at top management level

**21 %**  
Female

**79 %**  
Male

# Wages, social protection and collective agreement

S1-7, S1-9, S1-10, S1-15

Nitor is not a member of the Employers’ Confederation and is therefore not formally bound by any collective bargaining agreement (TES), as it is not generally binding. However, Nitor voluntarily follows the relevant collective agreement to ensure fair and consistent employment practices.

Nitor does not currently use a systematic external benchmark to evaluate wage adequacy across its workforce. However, all employees are paid at a competitive and appropriate level within the Finnish labour market. There is no indication that any employees earn below what would be considered an adequate wage in the local context.

All Nitor employees are covered by social protection through public programs or employer-provided benefits against various risks of income loss. Specifically, employees are protected in cases of sickness, in accordance with the Finnish collective agreement (TES), which provides paid sick

leave followed by continued income protection through the national social security system (KELA). In Finland, 100% of employees are represented through elected employee representatives in accordance with the Finnish collective agreement (TES) and the Act on Co-operation within Undertakings.

Additionally, all employees are covered against income loss due to unemployment, employment injury, acquired disability, parental leave, and retirement. All employees are entitled to family related leaves through social policy and collective bargaining agreement. During 2025, 10% of the employees took family-related leave.

**Table 11:** Pay gap and total remuneration

TYPE	PERCENT
Gender pay gap	8% (exact 8,03 %)
Annual total remuneration ratio	1,7

# Health, safety, remuneration and human rights metrics

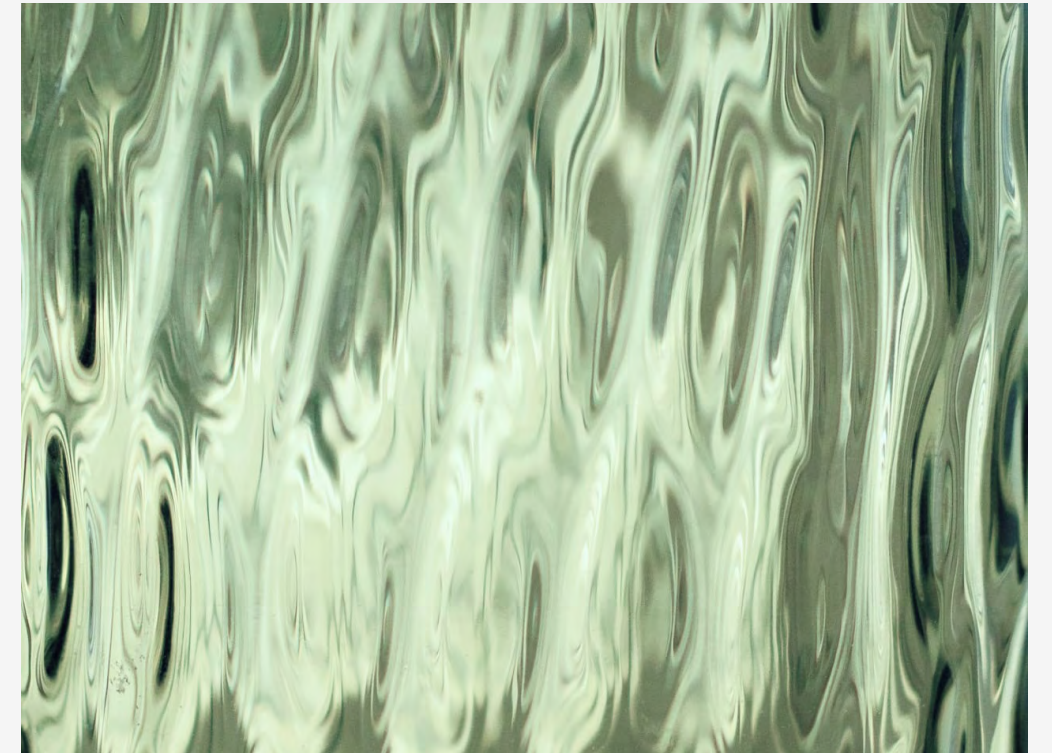
S1-13, S1-16

100% of the company's employees are covered by an occupational health and safety management system that complies with Finnish legal requirements. Beyond this statutory baseline, Nitor provides employees with voluntary supplementary insurance, including extended medical expenses insurance, commuting insurance, and leisure-time accident insurance. Occupational health services extend beyond the legal minimum, covering additional services such as dental care, expanded mental health support, and gynaecological services.

During the reporting period, Nitor reported zero fatalities and no recordable work-related accidents among its employees or other workers at its sites. Consequently, the recordable accident rate was 0%, with no days lost due to work-related injuries, illnesses, or fatalities.

## Incidents, complaints and severe human rights impacts

During 2025, Nitor did not receive formal complaints about discriminatory treatment from its employees filed through the channels for employees to raise concerns, nor were there any discrimination incidents. The company also did not receive any complaints through the National Contact Points for OECD Multinational Enterprises, nor did it incur any fines, penalties, or compensation related to discrimination or harassment. Additionally, there were no reports of serious human rights issues or incidents connected to its workforce.



# Consumers and end-users

## Social

Digital services touch everyone. That's why how they are built matters. We work with our customers to create solutions that are inclusive, secure, and trustworthy to the people who rely on them.

# Digital services build on trust

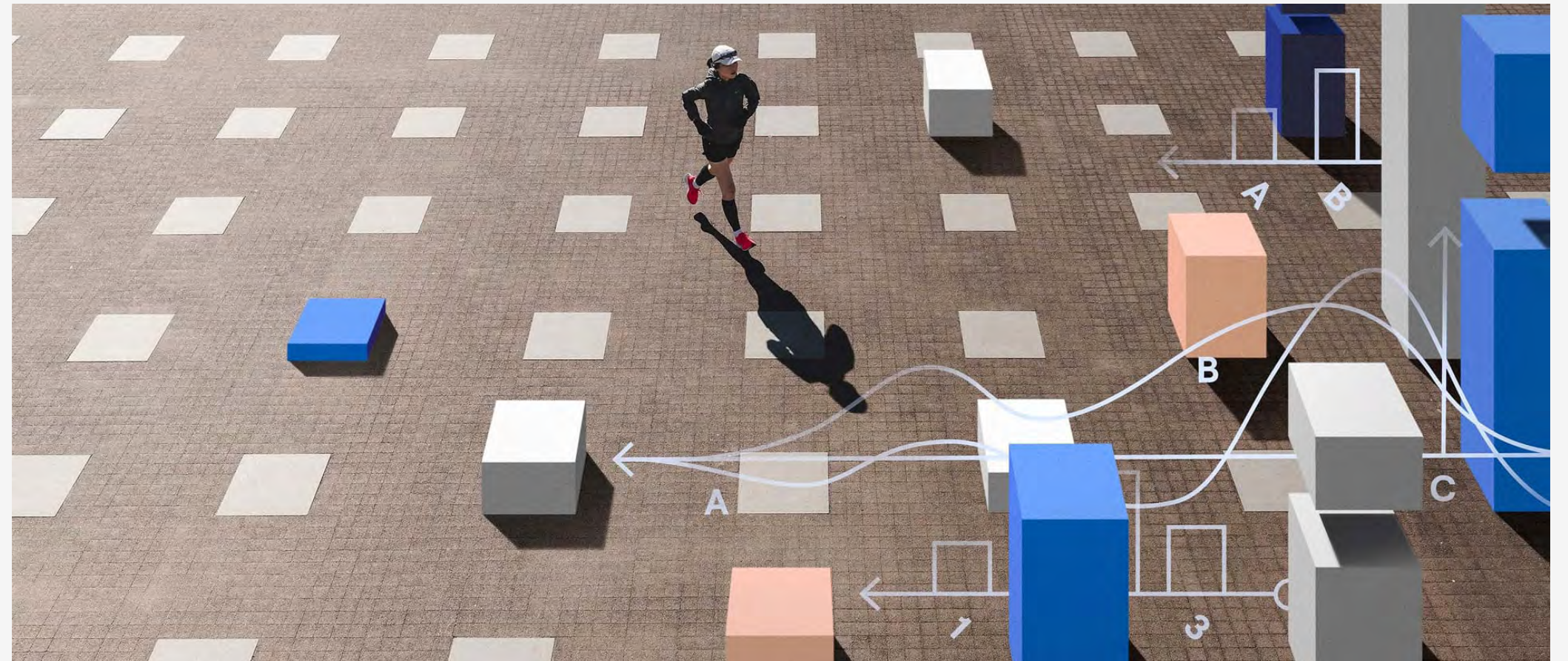
Information security, human-centred AI, and accessibility are central to how we design, build, and deliver digital services. We treat data security not as a compliance checkbox but as a core part of building trustworthy digital solutions. AI is transforming digital development, and we choose to develop and apply it responsibly and transparently, in ways that genuinely improve the services we build. Accessibility ensures that those services are usable by everyone. As a digital consultancy, our greatest impact comes through the work we do with our customers, and we aim to be a partner they can rely on to make better choices for the people who use their services.



# Consumers and end-users related impacts, risks and opportunities

IRO-2

Digital services shape the experiences of the people who use them. Through our double materiality assessment, we have identified the consumers and end-users related impacts, risks and opportunities that are most relevant to our strategy, business model and value chain. As a digital consultancy, our most significant impacts on consumers and end-users stem from the solutions we design and build for customers, where choices around information security, human-centred AI, and accessibility directly affect the safety, privacy, and inclusion of the people who rely on those services.



TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
<p><b>Informational impacts on end-users</b></p> <p>Products must respect privacy, data protection, and information security while operating fairly and responsibly, enabling users to make informed choices based on clear, trustworthy information.</p>	<p><b>↑ ACTUAL POSITIVE IMPACT: SHARING EXPERTISE</b></p> <p>Supporting self-directed skills development enhances our consultants’ professional growth and encourages ongoing development.</p>	<p><b>🔍 FINANCIAL OPPORTUNITY: MARKET DIFFERENTIATION ENABLED BY RESPONSIBLE TECHNOLOGY</b></p> <p>Developing solutions with the focus on information security, data protection, and responsible AI strengthens customers’ ability to deliver safe and reliable digital services, enhancing trust and creating opportunities for market differentiation.</p>
<p><b>Social inclusion of end-users</b></p> <p>Products should be accessible and accommodate various needs to ensure that end-users can participate fully in society and utilise services equally.</p>	<p><b>↑ POTENTIAL POSITIVE IMPACT: DIGITAL INCLUSION</b></p> <p>Enhancing digital inclusion and implementing accessibility solutions beyond legal requirements enables our customers to provide equitable services. At the same time our expertise in evolving user needs helps ensure broad, inclusive service reach.</p>	

# Policies related to consumers and end-users

S4-1

Nitor protects consumer and end-user rights through a set of policies and management practices. We are committed to upholding the human rights defined by the UN Global Compact's Ten Principles, including the rights to access, safety, and non-discrimination. These principles are embedded in how we operate and are reflected in our Code of Conduct alongside our other policies.

The principles set out in our Information Security Policy and Privacy & Data Protection Policy, implemented through our ISO/IEC 27001:2022-aligned management system, ensure that the solutions Nitor helps build handle personal data and sensitive information responsibly and securely.

Our approach to responsible and trustworthy AI, governed by the AI Policy described in our business conduct section, ensures that AI is applied in customer solutions in ways that are safe, fair, and beneficial for the people who encounter it, with transparency and human oversight as guiding principles.

These policies apply to Nitor's own operations in Finland and to the solutions Nitor develops and delivers to its customers. They do not extend to subcontractors or other third parties in Nitor's value chain. The affected stakeholder group covered by these policies is the end-users of the solutions Nitor helps build, that is, the individuals who interact with or are affected by the digital products and services developed with Nitor's involvement.

# Engagement, grievance channels and remedy

S4-2

Nitor typically does not interact directly with consumers and end-users, as we provide digital services through customers who maintain the primary relationship. Grievance and feedback channels for end-users are therefore ordinarily managed by our customers, who hold operational responsibility for those processes. During projects, however, our consultants engage with consumers and end-users through concept development, user testing, workshops, and interviews, contributing to an understanding of end-user needs that is reflected in the final solution. The extent to which these insights directly shape decisions varies by project, depending on the nature of the engagement and the customer's own processes.

To gain insight into the perspectives of consumers and end-users who may be particularly vulnerable, Nitor has developed in-house accessibility expertise. Our consultants

apply this knowledge in project work to ensure that the needs of users such as persons with disabilities are considered in the design and development of digital solutions. This expertise is embedded in our ways of working and informs how we approach inclusive design in customer engagements.

Nitor maintains a whistleblower channel that is available to all stakeholders, including for concerns related to the digital solutions we help build. Where Nitor has caused or contributed to a negative impact on consumers or end-users, we are committed to cooperating fully with customers in identifying and addressing the issue. In AI-related projects, this also includes advising customers on transparency towards end-users and the design of appropriate human oversight mechanisms, reducing the risk of harm at the point where it is most likely to occur.

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# Actions, resources and targets

S4-3, S4-4

Our actions focus especially on information security and data protection, AI use and governance, and accessibility, as these are the areas where the quality of our work most directly affects the people who use those solutions.

## Information security, privacy and data protection

The digital services people use every day handle sensitive personal information. A security breach does not just mean lost data. It can mean a violation of privacy, a loss of control, and damage to trust that is hard to repair. For Nitor, building security and privacy into services from the start is therefore not just a technical requirement but a fundamental responsibility toward the people those services affect.

Security and privacy requirements are defined at the start of every customer delivery, ensuring that protections are built into services from the outset rather than added later. In

2025, we offered organisation-wide mandatory training on information security, which means that security and privacy considerations are a shared baseline across every team involved in customer delivery, not just a specialist concern.

Nitor maintains its own standards and guidelines for secure development, covering practices such as threat modelling, security reviews, privacy impact assessments, secure coding practices, penetration testing, and code reviews with security criteria. These form a baseline that Nitor upholds across all engagements. In customer projects, Nitor follows the customer's own security standards where these exist but does not lower its own baseline in doing so. While end-user data is usually managed by our customers, our methods ensure that Nitor's part of any service consistently meets high standards. Our knowledge in information security also allows us to assist customers in demanding contexts, such as critical infrastructure and regulated industries.

## Responsible and trustworthy AI

AI is becoming a core building block of digital services, and the decisions made in how it is designed and deployed have real consequences for the people who encounter it. Systems that are opaque, biased, or poorly governed can cause harm in ways that are often invisible to the end-user, which makes the responsibility of those who build them all the greater. We try to ensure that AI improves the services we create in ways that benefit users, rather than simply increasing their technical capabilities.

Nitor approaches AI with transparency, fairness, and human oversight as guiding principles, both in the solutions we build for customers and in how we use AI internally. In 2025, we conducted a mandatory AI literacy training across the organisation, to ensure that responsible AI use is understood and applied consistently across all customer work, not left to individual judgement.

We advise customers on AI governance and help them navigate the requirements of the EU AI Act, applying the same standards internally that we advocate externally.

## Inclusive digital services

Digital services that cannot be used by everyone are not truly serving society. For people with disabilities, the elderly, or others with specific needs, inaccessible services are not an inconvenience but a barrier to full participation in everyday life. As digital services become increasingly essential, the responsibility to make them accessible grows with them.

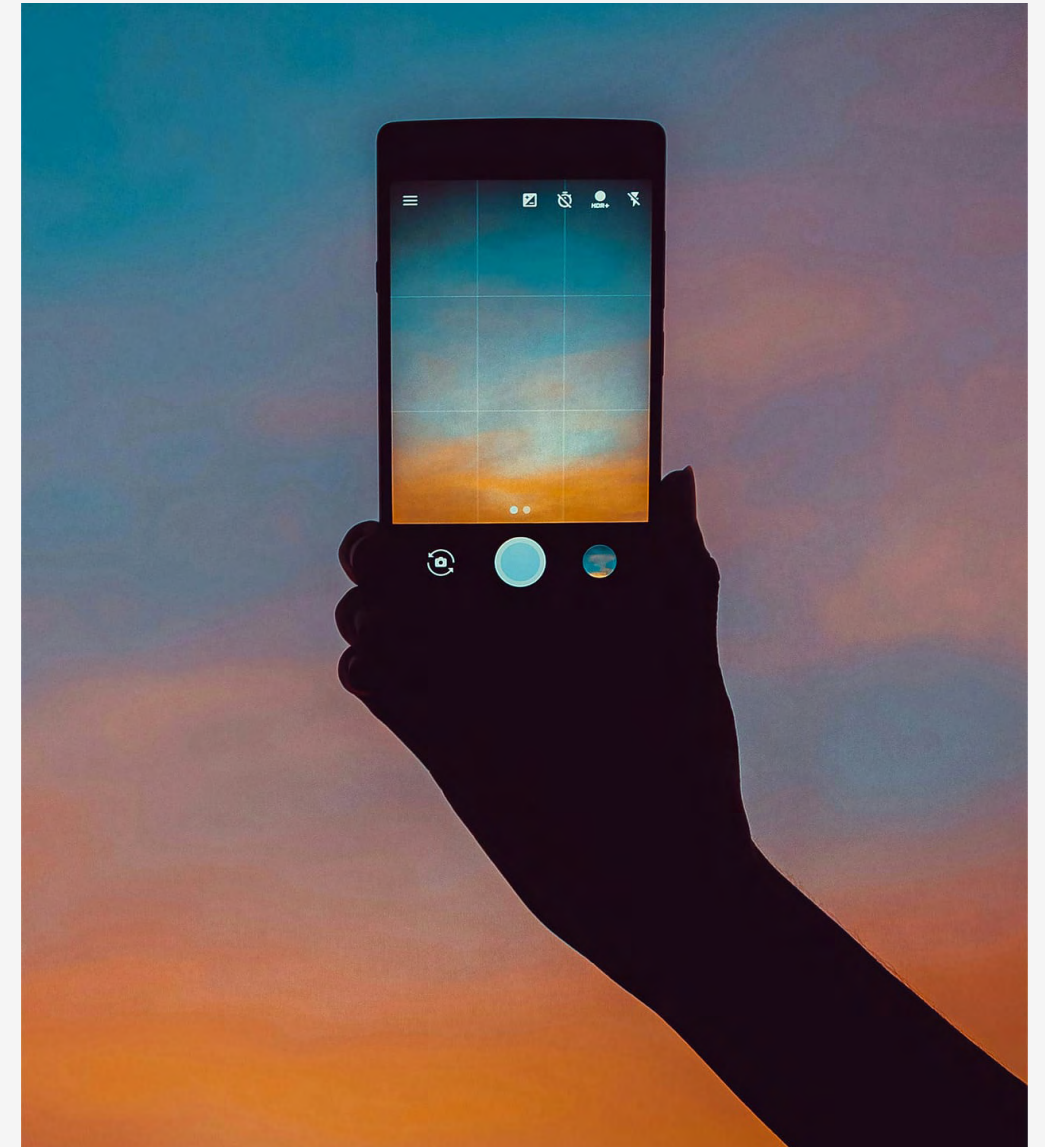
During 2025, we focused on accessibility certifications. By the end of 2025, we had 62 W3C accessibility certified employees, up from 48 in 2024, including specialists holding CPACC, WAS, and CPWA certifications. Nitor ensures that accessibility is considered from the earliest stages of service design, applying WCAG 2.2 AA standards and involving users with lived experience directly in project teams. We support customers through consulting, training, and auditing services, and help them prepare for growing regulation such as the European Accessibility Act.

## Respecting human rights

As of 2025, no human rights issues or formal grievance cases from end-users have been reported. We continue to refine our processes and capabilities, ensuring we are ready to act responsibly and proactively if such situations arise in the future.

## Targets related to consumers and end-users

Our target remains zero serious security incidents, reflecting the effectiveness of our protective measures. A serious incident is defined as one having a significant impact on business operations, service availability, data security, or personal data privacy.



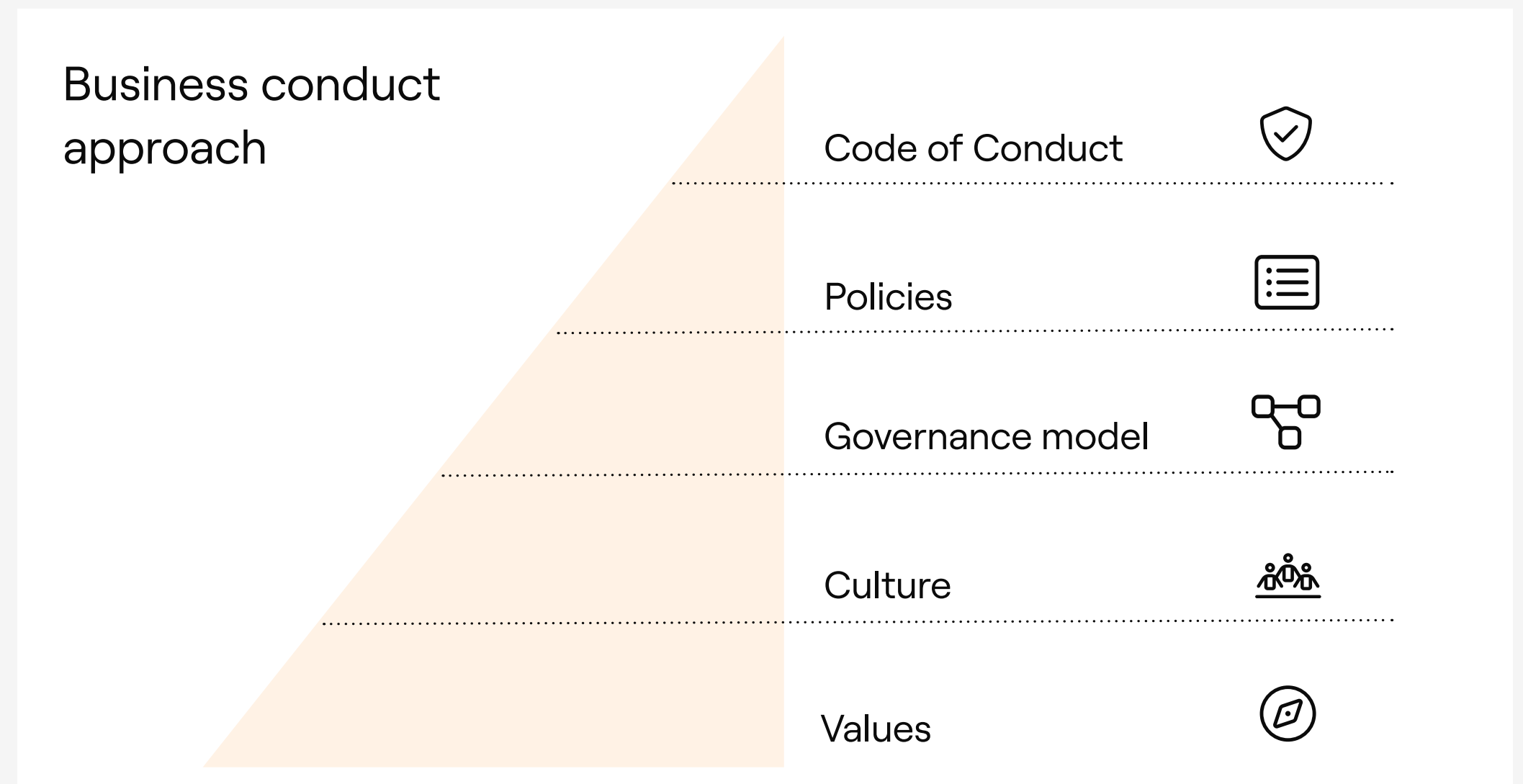
# Business conduct

## Governance

Trust is earned through everyday actions, not compliance checklists. We operate with integrity, accountability, and transparency, holding ourselves to a standard that goes beyond what regulations require.

# Integrity in action

As Nitor grows, our responsibility to make our culture real for each new member also increases. Our code of conduct, policies, and management systems provide a formal foundation for this culture. However, maintaining it is a human responsibility that grows with each new hire and each decision we make. Leaders have a special role in this. They do not just impose rules, they demonstrate the behaviors and judgment we expect from everyone.



# Business conduct related impacts risks and opportunities

IRO-2

Nitor’s evaluation of business conduct looks at the impacts, risks, and opportunities in three areas. First, it examines how we serve customers with integrity. Second, it considers how we manage our supplier relationships. Finally, it focuses on how we maintain an internal culture that encourages responsible decision-making. As a digital consultancy, our risks related to business conduct mostly come from customer work and procurement, not from physical operations or complex supply chains. This influences our policies and the way we check their effectiveness in practice.

TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
<p><b>Corporate culture</b></p> <p>An environment built on trust and responsible, transparent working methods supports employees’ success and is reflected in customers through high-quality, reliable operations.</p>	<p><b>↑ ACTUAL POSITIVE IMPACT: RESPONSIBLE OPERATING CULTURE</b></p> <p>A culture of responsible and transparent work practices fosters trust among employees, customers, and other stakeholders, supporting employees in their work and ensuring partners follow the same principles.</p>	<p><b>⚠ FINANCIAL RISK: FRAGMENTATION OF OPERATING CULTURE</b></p> <p>Ongoing organisational growth and change naturally reshape the operating culture. Without sufficient support and inclusion it may weaken alignment and engagement, affecting collaboration, consistency, and ultimately delivery performance.</p>

# Policies related to business conduct

G1-1

Nitor is committed to the principles of the UN Global Compact, which provide a universal framework for responsible business conduct. This commitment guides how Nitor approaches human rights, labour standards, environmental responsibility, and anti-corruption practices across its operations and relationships. During 2025, Nitor formalised a new governance model, establishing clearer structures for decision-making, oversight, and accountability across the organisation. The model will be taken into full use at the beginning of 2026.

Alongside our Code of Conduct, the Safer Space guidelines reflect the kind of workplace and working culture Nitor is committed to building. In the guidelines, we go beyond compliance, and aim to shape how people treat each other and work together. Our Code of Conduct sets the foundation for all our actions with our people, our customers, and our partners and other stakeholders. It covers areas such as addressing the ethical challenges arising from technology, committing Nitor to adherence to privacy laws and the ethical development and deployment of AI, with transparency, explainability, fairness, accountability, and human oversight as guiding principles.

The Safer Space guidelines, together with the social safety commitments in the Code of Conduct, reflect the kind of workplace and working culture Nitor is committed to building. They prohibit discrimination on any grounds as well as bullying, harassment, and any form of violence or abuse, and set concrete expectations for how people treat one another across all Nitor offices, events, and communication platforms. In this way, Nitor goes beyond compliance and aims to actively shape the culture and conduct of everyday working life.

Beyond the Code of Conduct, Nitor's approach to responsible business conduct is supported by a set of policies that address specific areas of risk and responsibility. Nitor's Information Security Policy and Privacy & Data Protection Policy set out the principles and approach to handling information across all internal work and project delivery. Both policies are implemented through our Information Security Management System, aligned with ISO/IEC 27001:2022, which governs how we protect the confidentiality, integrity, and availability of information across the organisation.

Nitor's AI Policy, pending approval and planned for publication in Q1 2026, establishes our organisation-wide approach to responsible and trustworthy AI use. It draws on the OECD AI Principles and the UNESCO Recommendation on the Ethics of AI as its ethical foundation, ensuring that AI is used in ways that are safe, fair, and transparent across all our operations and customer work.

The Risk Management Policy provides the framework for identifying, assessing, and managing strategic, operational, financial, and accidental risks. The Anti-Corruption Policy, based on the UN Convention against Corruption, applies to everyone working at or for Nitor and forbids all corrupt behaviour, including bribery in monetary or in-kind form, with particular attention to functions most exposed to corruption risk such as sales, procurement, and customer contract negotiations.

Nitor has a formal whistleblower protection policy. Our practices for protecting whistleblowers and handling related matters are described in the next section.



# Actions related to business conduct

G1-2

During 2025, we conducted an internal audit of our Information Security Management System against ISO/IEC 27001:2022 to assess the effectiveness of our controls and identify areas for improvement. This work lays the foundation for our planned certification in the first half of 2026.

During 2025, we established an AI Culture Team, bringing together cross-functional participants from across the organisation to ensure responsible AI adoption is a shared responsibility. The team supports our people in using AI responsibly, providing practical guidance aligned with our objectives and ethical standards. This work is being formalised through the AI Policy and an internal handbook on AI guidelines described in G1-1, both planned for publication in Q1 2026.

All employees are expected to complete annual mandatory training on conduct and integrity, and from 2025 this has been extended to include information security and AI literacy. New employees complete the same training as part of their onboarding process, and are additionally introduced to the policies and handbooks relevant to good business conduct at Nitor. Security awareness is further reinforced through continuous training via HoxHunt on an ongoing basis. Together, these programmes ensure that every person involved in building customer solutions brings a consistent baseline of security and responsible AI awareness to their work.

Nitor maintains close working relationships with its suppliers, including subcontractors, technology providers, and other service providers. All potential suppliers are

verified through the Vastuu Group Luotettava Kumppani service, covering basic compliance requirements such as insurance coverage, tax status, and trade register membership, as well as EU and UN sanctions screening. This verification process incorporates certain governance and compliance elements that form part of Nitor's consideration of supplier suitability. ESG performance factors are not yet systematically assessed as a standalone criterion in supplier selection beyond what the Vastuu Group verification covers.

No specific ESG training is currently provided to the people involved in procurement and supplier management, though they are subject to the same general conduct and integrity training as all Nitor employees. Nitor's Supplier Code of Conduct sets out our expectations regarding business conduct, with suppliers encouraged to align with these

principles over time through ongoing dialogue. Structured follow-up on supplier ESG performance improvement is not yet in place but represents an area for development in future periods.

Nitor has procedures in place to prevent, detect, and respond to allegations or incidents related to corruption or bribery. A public whistleblowing channel is available for anonymous reporting of concerns regarding Nitor and its operations. To protect possible whistle-blowers, we comply with the EU Whistleblower Protection Directive and relevant laws, as set out in our Code of Conduct. Reports are handled confidentially by a designated group that includes an independent Board representative, a employee representative, and the Occupational Safety and Health Manager, operating independently from management. Confirmed cases are escalated to senior management or the Board as necessary. The channel is available to all stakeholders and can be found on Nitor's public website.



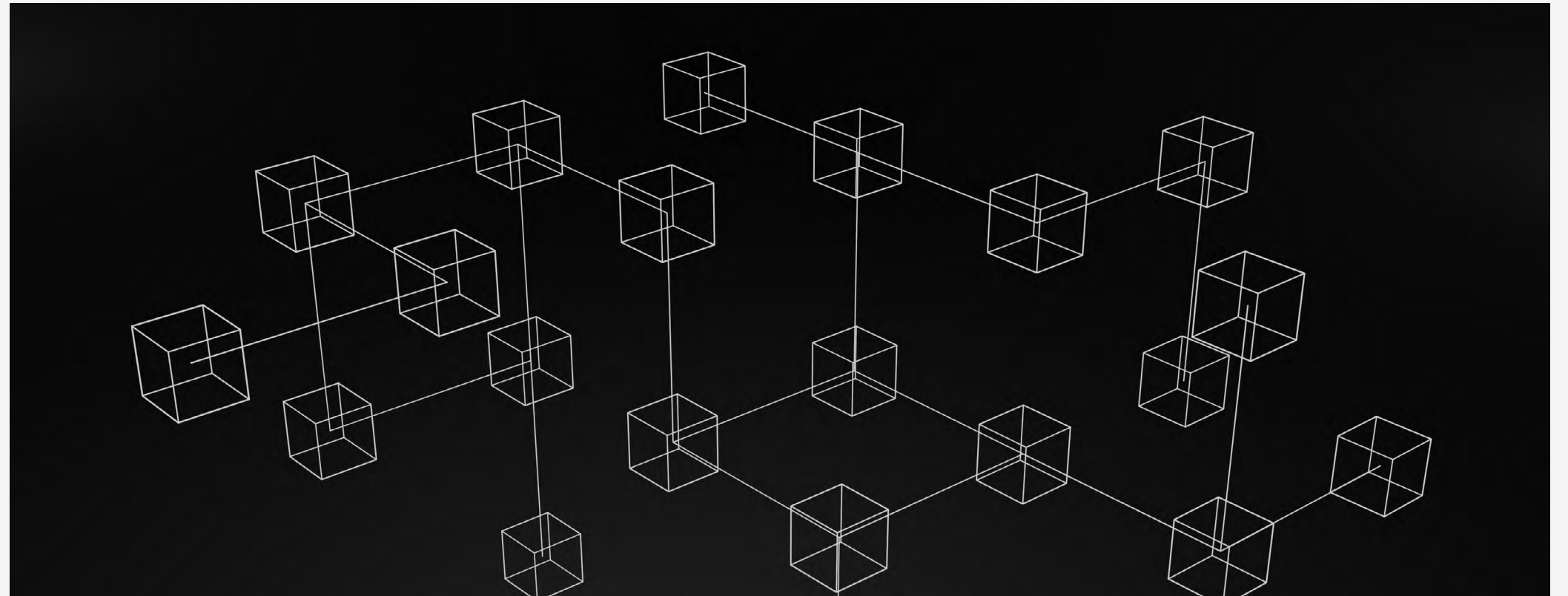
# Targets and metrics related to business conduct

G1-3, G1-4, G1-5, G1-6

Nitor's target is to maintain zero incidents of corruption or bribery, zero whistleblowing complaints, and full compliance with its standard payment terms.

Nitor does not engage in political lobbying or attempt to influence political decision-making, and made no financial or in-kind political contributions during 2025.

There were no reported or confirmed incidents of corruption, bribery, or other breaches of ethical business practices at Nitor during 2025. No convictions, sanctions, or fines for violation of anti-corruption or anti-bribery laws were recorded during the reporting period, and no legal proceedings related to such issues have been brought against the company or its employees. No complaints or reports were received through the whistleblowing channel during 2025.



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