Sustainability Report 2024

NITOR

About us

Diverse minds hold great vision, which can bend future realities towards favourable outcomes. Together with our digital engineers, we deliver sustainable digital solutions that meet tomorrow's challenges with today's innovation.

Developing digital sustainability

Sustainability at Nitor isn't a separate initiative—it's integral to our business strategy and operations. Making digital development sustainable isn't just our mission statement; it drives our daily decisions and actions. I am eager to build a workplace that positively impacts the environment while empowering our people. Through our client partnerships, we can extend this positive influence on our customers and end-users interacting with our digital solutions.

The digital solutions we create reach far beyond our immediate clients. By collaborating closely with customers, we can enhance the sustainability aspects of these services, particularly in data security and accessibility. Nitor continues to support the implementation of accessible digital services and offer training on various accessibility aspects. Our commitment to long-term partnerships and regular customer satisfaction measurement ensures we deliver lasting value.

We have identified the key areas for our sustainability work—climate change, our employees, consumers and end-users, and governance—and will continue to develop our work within these topics in the following years. The happiness of our people remains our most valuable asset. We're fostering a sustainable work pace while continuing to promote diversity and equality, creating an environment where professional development flourishes, enhancing both job satisfaction and our consultants' competitiveness in the market.

In 2024, we took decisive steps to strengthen Nitor's sustainability foundation. By appointing a dedicated sustainability director, conducting our first double materiality analysis, and committing to the Science-Based Targets initiative, we've put concrete action behind our values. These strategic moves have culminated in this, our first sustainability report.

I'm personally committed to integrating climate action, employee well-being, exceptional user experiences, and responsible governance across our entire organisation. We're focused on meaningful metrics that drive genuine impact, not just checking boxes. This is how we fulfil our mission of making digital development truly sustainable.

Olli Auvinen, CEO

About Nitor

Nitor is a Digital Engineering Company committed to sustainable digital development. We create solutions to meet changing business challenges, with a lifetime guarantee for the customer. Our Digital Engineers harness digitalisation to achieve creativity, productivity and new business. Through digital strategies, AI and product leadership, we help our customers build future-proof solutions.

We bring together the expertise of over 300 professionals based in Helsinki, Stockholm, and Tampere. Since our founding in 2007, we've been recognized 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.

- 40 M€ net sales
- 300+ Digital Engineers in Helsinki, Stockholm and Tampere
- 86 NPS score in customer study
- No 1 Best customer satisfaction in the IT sector (Onway) 2012-2024

About the report

This sustainability statement (the "Report") has been prepared following the structure and disclosure themes of the European Sustainability Reporting Standards (ESRS), in alignment with the Corporate Sustainability Reporting Directive (CSRD) requirements. It serves as a preliminary report to support Nitor's preparedness for future CSRD reporting obligations. The content of the Statement is based on our double materiality assessment.

Contents

General disclosures

Overview

As digital experiences shape life and work, their creation must adhere to the highest standards of responsibility, quality, and impact. Our mission is to make digital development sustainable by taking digital quality and experience to a new level.

Make digital development sustainable

As digital engineers, we create business-critical systems to meet ever-changing needs by transforming technology into scalable, responsible services. Diverse minds hold great visions, and through collaboration with our clients, we share our working culture and co-create resilient businesses that embrace change, identify new growth opportunities, and stay ahead of the times. We call this sustainable digital development.

Sustainability is deeply integrated into our business strategy, vision, and mission, driving our commitment to a more responsible and sustainable future. We operate in a fair, responsible and trustworthy manner, and are constantly enhancing our operations, promoting sustainable development, and minimising negative environmental as well as societal impacts.

By fostering a strong culture of responsibility, we empower our employees to adopt and encourage responsible practices, contributing to our sustainability goals and supporting positive change within and beyond our organisation. Together with our customers, we create a positive net impact by advancing responsibility in digital business, identifying new opportunities to support their sustainability efforts with digital solutions, and reducing the negative impacts of their activities.

We aim to be industry leaders by creating meaningful impact through sustainable digital development. Our commitment aligns with internationally recognised frameworks: we are a signatory of the United Nations Global Compact since 2016, our certification from WWF Green Office for our environmental management system achieved in 2023, and our commitment to the Science Based Targets initiative (SBTi) made in 2024. These commitments guide our efforts toward a responsible and sustainable future.
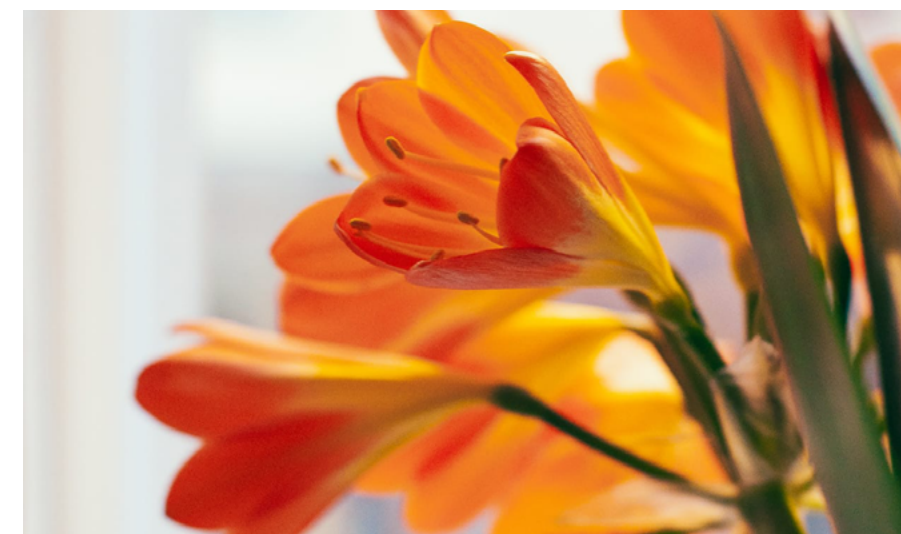
Double materiality assessment

Nitor conducted its first Double Materiality Assessment (DMA) in 2024, in alignment with the European Sustainability Reporting Standards (ESRS) and EFRAG guidance. This helped to establish a systematic method for prioritising significant environmental and social impacts along with financial risks and opportunities.

The assessment addressed impact materiality, our impacts on the environment and our own workforce, and financial materiality, covering sustainability-related risks and opportunities. Key topics include climate change adaptation, training and skills development, work-life balance, gender equality, equal pay, and corporate culture, all of which foster a responsible and inclusive workplace.

The assessment reinforced the link between sustainability and strategic priorities, emphasising the need to manage impacts across the value chain. As our first assessment under the ESRS framework, we will refine and expand the process for deeper sustainability integration into risk management and reporting.

Methodology

The assessment covered our own operations and relevant parts of the value chain. It identified and assessed both actual and potential impacts on employees and the environment, as well as sustainability-related risks with financial implications. The value chain analysis primarily focused on first-tier suppliers and customers, and was based mainly on internal expertise.

For 2024, we used only a 1–3 year time horizon to evaluate environmental and social impacts alongside financially material risks. While this differs from the multiple time horizons recommended in ESRS guidance, it provided a focused and practical basis for identifying our most significant topics at this stage.

The assessment considered both positive and negative sustainability impacts (impact materiality), and evaluated risks and opportunities that could affect the company's financial performance, position, or cash flow in the short, medium, and long term (financial materiality), including direct and indirect financial risks arising from environmental, social, and governance (ESG) factors.

The process engaged internal subject matter experts from leadership, business units, and group functions to ensure comprehensive coverage of relevant topics. While affected external stakeholders were not directly consulted during this cycle, an independent member of the Group's Board of Directors (the "Board") participated in the process to offer an external perspective.

During the data collection phase, insights were gathered through interviews, combining both quantitative and qualitative information. The analysis was further supported by internal expertise.

Following these evaluations, a dedicated phase identified and defined the most relevant Impacts, Risks, and Opportunities (IROs). This step consolidated findings from both materiality assessments to create a comprehensive view of the sustainability topics affecting Nitor. Finally, a prioritisation phase ranked the topics based on the significance of their impact and financial relevance, forming the basis for the disclosures.

Full double materiality matrix

Impact materiality Impact on society and environment	**Significant** Climate change mitigation Social dialogue Secure employment	Training and skill development Work-life balance Gender equality and equal pay Corporate culture
	Moderate Health and safety Energy Information-related impacts for consumers and/or end-users	Climate change adaptation Diversity Social inclusion of consumers and/or end-users
	Moderate	Significant

Financial materiality

Impact on Nitor

Basis for the preparation (BP-1, BP-2)

Scope and basis of the sustainability statement

This sustainability statement has been prepared on a consolidated basis, covering Nitor Group and all its subsidiaries, in alignment with the scope of the 2024 financial statements. The reporting period spans from January 1 to December 31, 2024. The report includes activities across Nitor's upstream and downstream value chain where material impacts, risks, or opportunities have been identified.

The statement's content is based on Nitor's DMA conducted in 2024, which identified four material topics: Climate Change (E1), Own Workforce (S1), Consumers and End-users (S4), and Governance (G1).

No subsidiaries are exempt from reporting, and no information has been omitted due to confidentiality, intellectual property, or ongoing negotiations.

Disclosures in relation to specific circumstances

This is Nitor's first sustainability report, with all disclosures based solely on the European Sustainability Reporting Standards (ESRS). No changes to methodology or presentation apply, and no disclosures rely on external frameworks.

For the 2024 DMA, we applied a 1–3 year time horizon to assess environmental and social impacts and financially material risks and opportunities. Although ESRS guidance suggests multiple time horizons (short, medium, long), this single-horizon approach provided a practical starting point for prioritisation in our first cycle.

We assessed value chain impacts on tier-1 suppliers and direct clients using internal knowledge. Mapping the entire value chain is still developing. Calculating Scope 3 GHG emissions mainly relies on a spend-based estimation method and secondary emission factors from public databases. We aim to improve the accuracy of these estimates.

No disclosure requirements or data points are referenced. All relevant disclosures are directly in the sustainability statement.

Disclosures Beyond ESRS

Nitor's 2024 double materiality assessment identified the following material sustainability topics: Climate Change (E1), Own Workforce (S1), Consumers and End-users (S4), and Governance (G1). The following were not considered material and therefore were not assessed: Workers in the Value Chain (S2), Affected Communities (S3), and Biodiversity (E4).

Our business model incorporates sustainability, and our vision is to make digital development sustainable. Climate-related issues are managed through an environmental system that promotes data-driven decision-making and improvement. Our social approach emphasises employee well-being, lifelong learning and sustainable pace. Responsible digital services prioritise information security, accessibility, and privacy. Governance frameworks ensure alignment with ethical standards.

We are establishing climate targets aligned with the Science Based Targets initiative (SBTi) for submission by 2026. Our goals include enhancing employee experience and customer satisfaction, improving gender diversity among employees and leadership, and boosting digital accessibility. Our governance model is reviewed annually and is overseen by the Board.

Our policies include the Code of Conduct, Environmental Policy (E1), Occupational Health and Safety Plan, Equality Policy (S1), Information Security Policy (S4), Anti-corruption Policy (G1), and Risk Management Policy for risk identification and mitigation.

To mitigate actual and potential adverse impacts, we have adopted preventive and corrective measures, including well-being programmes, stakeholder engagement, energy and emissions monitoring, and strong internal controls. An independent whistleblowing channel further promotes accountability.

Governance (GOV-1, GOV-2, GOV-3, GOV-4, GOV-5)

Structure and composition of governance bodies

Nitor's administrative, management, and supervisory bodies comprise a total of 12 members, of whom 7 are executive and 5 non-executive.

In terms of gender and diversity, 8% of all members are women (1 member), and 92% are men (11 members). Focusing on the Board specifically, 17% are women (1 member) and 83% are men (5 members), indicating a gender diversity ratio of 1:5 in favor of male representation.

Furthermore, 50% of the Board members are classified as independent, reflecting a balanced governance structure in line with good corporate governance practices.

Nitor's governance structure is aligned with the Finnish Companies Act and comprises the General Meeting of shareholders, the Board, and the Chief Executive Officer (CEO). The Board holds the ultimate responsibility for Nitor's strategic direction, which encompasses sustainability-related impacts, risks, and opportunities.

These duties are outlined in the Articles of Association and the Board's Rules of Procedure. In addition to the Articles of Association, governance is regulated by the rules of procedure, which define the key tasks of the Board, committees, and the CEO, as well as the meeting practices observed by Nitor.

Operational management and employee involvement

The CEO is responsible for operational management and reports directly to the Board. The CEO is supported by the Leadership Team, which includes leaders from key functions such as People Operations, Legal, Sustainability, Finance, IT, and managing directors of each subsidiary company.

Operative work is managed by three steering groups — Commercial Steering, Admin Steering, and People Steering — each with a defined scope and responsibilities. These groups consist of relevant directors and key representatives.

Two employee representatives participate in the Leadership Team. Their involvement enhances social dialogue by highlighting employee views, improving transparency, aiding informed decision-making, and leveraging employee expertise in shaping the company's direction.

Information provided to administrative, management and supervisory bodies

The Board validates Nitor's risk management principles, strategic objectives, and priorities, and assesses the adequacy and effectiveness of risk management processes. Risk assessments are conducted regularly, with significant changes reported to the Board.

Nitor conducts an annual cycle to set or update ESG targets, review strategy, and assess risks. These issues are prepared by the Leadership Team for the Board. The CEO delegates authority to functional leads according to their responsibilities.

The Sustainability Director implements sustainability objectives across the organisation, reporting to the

Board and Leadership Team on updates regarding ESG initiatives, target progress, and performance reviews, all integrated into Nitor's annual planning and reporting cycle.

The Director of People Operations oversees Nitor's social sustainability and risk management. This role ensures alignment of social and risk considerations with the company's business and governance practices.

The General Counsel and Chief Financial Officer (CFO) oversee governance and compliance, ensuring adherence to legal obligations, internal policies, and financial integrity.

Addressed sustainability topics

Sustainability is integrated into strategic planning, risk management, and controls. Climate risks, workforce well-being, digital responsibility, and governance are considered with financial and operational factors. This supports informed decision-making and embeds sustainability in long-term business direction.

The Board and Leadership Team have reviewed the following material sustainability topics:

- Information security
- Risk management
- Sustainability objectives
- Employee well-being and skills development
- Internal controls
- Remuneration policies

Sustainability-related remuneration and incentive structures

Nitor does not have incentive schemes or variable pay linked to sustainability performance for its administrative, management, or supervisory bodies. Consequently, no formal sustainability targets assess individual performance, and 0% of variable pay relies on ESG outcomes.

The CEO and managing directors' remuneration is governed by Nitor's policy, which is approved by the Board. This policy outlines contractual terms, including financial compensation and severance conditions in agreements.

Changes to incentives or remuneration require the Board's approval and must align with Nitor's governance procedures. Updates are disclosed to shareholders before General Meetings.

Statement on due diligence

Nitor's sustainability due diligence is an ongoing process integrated into business operations. It aims to identify and manage environmental and social impacts, risks, and opportunities. When significant negative impacts are identified, mitigation actions are taken directly or with stakeholders. Engaging with affected stakeholders is essential, providing critical input for improving the effectiveness of due diligence measures.

Risk management and internal controls over sustainability reporting

Nitor's risk management framework is based on ISO 31000:2018 standards and the guidelines provided by Suomen Riskienhallintayhdistys. This framework has been adapted to align with Nitor's operational model and organisational culture.

Nitor conducts an annual risk assessment that includes environmental, social, and governance (ESG) risks. Additionally, the double materiality assessment may highlight emerging or previously overlooked risks, which are then evaluated and, where relevant, integrated into Nitor's broader risk management framework. These risks are embedded within the company's overall risk management and internal control systems to ensure they are systematically identified, assessed, and managed alongside financial and operational risks.

In 2024, ESG-related risks were evaluated as part of this cycle and reported to the Board. Although none were classified as key risks due to their low probability and limited potential impact, they continue to be monitored and addressed through preventive measures, internal controls, and regular policy updates.

Strategy, business model and value chain (SBM-1)

Nitor comprises over 300 experts, including 251 own employees (headcount) and over 50 contractors through our trusted partnership network. Our total revenue amounts to €40.446 million.

Our vision is to make digital development sustainable, and sustainability is an integral part of our overall strategy. We offer a wide range of expertise that supports sustainable digital development, and our core services include software development and architecture, product design, cloud technologies, data and AI solutions, and strategic consulting.

Nitor primarily operates in Finland and has an international presence in Sweden through a local subsidiary.

Our customer base spans both the private and public sectors, including large enterprises and organisations in retail, telecom, finance, logistics, healthcare, and industry. Our customer relationships are founded on trust and the creation of long-term value. We are committed to supporting our clients through responsible digital development to help them ensure business continuity in an increasingly complex operating environment.

Nitor's position is primarily that of a trusted advisor and solutions partner. We operate as an integrator and innovator within the digital value chain. In the upstream segment, we collaborate with cloud service providers and technology partners to source high-quality digital technologies and expertise. In the downstream segment, Nitor delivers customised solutions to customers, maintaining strong relationships to ensure ongoing support and alignment with their evolving needs.

As a digital consultancy company, Nitor's most essential resource is its people. We secure key inputs—including highly skilled professionals and specialised expertise — through targeted recruitment and continuous professional development.

Nitor does not operate in any of the sectors listed in ESRS 2 SBM-1 paragraph 40(d), such as fossil fuel or chemical production, cultivation and production of tobacco, or controversial weapons.

Interests and views of stakeholders (SBM-2)

Nitor engages in active and continuous dialogue with its stakeholders across all areas of its business. The methods of engagement vary by stakeholder group and reflect each group's strategic importance and relationship to our operations.

We regularly interact with our primary stakeholders, including employees, customers, investors, shareholders, partners, suppliers, and subcontractors. Engagement occurs through surveys, client discussions, participation in events and networks, and project-specific interactions.

Stakeholder input contributes to the development of our sustainability approach, helping to identify significant impacts and shape our business model, strategy, and operations. Stakeholder feedback has influenced the enhancement of our environmental management practices, increased inclusivity in digital design, and reinforced our commitment to science-based climate targets.

Stakeholders are increasingly interested in issues such as data responsibility, digital accessibility, and climate action, which are reflected in our service offerings and advisory work. Nitor continually refines its strategy in response to external developments and stakeholder feedback.

Business model – Material impacts, risks and opportunities (SBM-3, IRO-1, IRO-2)

Nitor's business impacts on people, the environment, and society arise both directly from its own operations and indirectly through the activities of its clients enabled by Nitor's digital services. As these impacts are primarily realised through digital solutions, they are often intangible or less visible; yet, they can be significant, shaping how services are accessed, how data is handled, and how technology supports sustainable outcomes.

Nitor assists its clients across various industries in advancing sustainable digital development. By integrating accessibility and information security and leveraging our expertise in cloud solutions, AI, and data, we help organisations optimise their operations, enhance service inclusivity, and minimise environmental impacts. Our work with both public and private sector clients contributes to broader societal goals, such as digital inclusion, privacy protection, and long-term operational resilience.
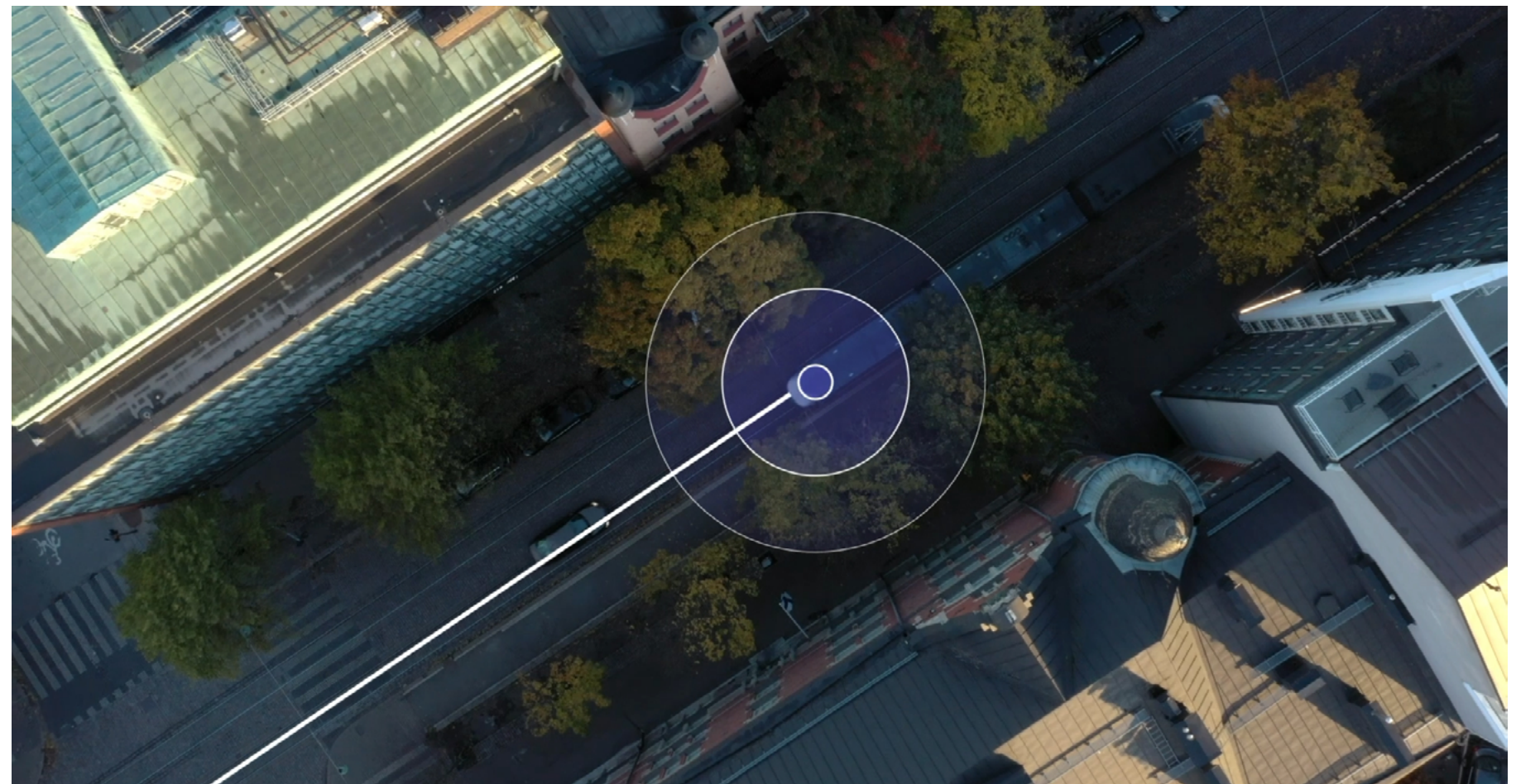
Description of the process

Nitor's material impacts, risks, and opportunities were identified through a formal double materiality assessment conducted in 2024. The assessment followed the implementation guidance on materiality assessment issued by EFRAG. It was designed to capture impacts arising from Nitor's own operations as well as its business relationships across the value chain.

The process covered both internal activities and indirect impacts of digital services provided to clients, such as impacts on accessibility, data privacy, and environmental outcomes throughout the digital value chain.

The assessment began with a baseline analysis using Nitor's strategy, business model, operating principles, greenhouse gas emissions data, and employee survey results. This informed the identification of the most relevant stakeholder groups.

Stakeholder consultations included interviews with leadership members, employees, and investors. These insights were crucial in identifying and prioritising actual and potential impacts.

Impacts were evaluated using a structured scoring framework. Negative impacts were assessed based on severity, scope, likelihood, and irremediability. Positive impacts were evaluated according to scale, scope, and likelihood. Financial risks and opportunities were assessed utilising Nitor's existing risk management framework, supported by data from the internal risk register. Each was scored based on likelihood and magnitude, and evaluated considering Nitor's business context and exposure across the value chain.

Topics with an average score above 3.5 (on a 1–5 scale) on both material and financial materiality were classified as material, while some topics were included based on notable stakeholder insights.

Opportunities are assessed in the context of market trends and customer needs, and are incorporated into Nitor's ongoing service development and innovation planning. Any newly identified risks were added to the risk register, and corresponding actions were defined and implemented following Nitor's risk management process.

Disclosure requirements

The sustainability statement includes disclosures aligned with the European Sustainability Reporting Standards (ESRS) and incorporates all necessary data points required by other EU legislation. These disclosures are integrated throughout the report regarding the relevant sustainability matters.

The statement is based on Nitor's double materiality assessment in section IRO-1. Sustainability topics and their disclosure requirements were included if they exceeded the materiality threshold. Material information was selected by first identifying material topics through the double materiality process. The corresponding ESRS Disclosure Requirements and data points were then evaluated, and only those related to material matters were retained in the sustainability statement.

Climate change

Environment

As climate change reshapes the world and the future, digital solutions must align with environmental responsibility and resilience. We are committed to creating adaptable, long-lasting solutions that deliver enduring positive impact in a changing world.

Transition to data-driven climate action

Nitor recognises climate change as a critical challenge and has integrated it into both its sustainability agenda and business strategy. We monitor greenhouse gas emissions, resource use, and waste generation to support targeted sustainability actions. Sustainability data plays a central role in our decision-making and operational improvement, enabling measurable and transparent climate action that aligns with global goals.

Nitor is committed to climate action through near-term and net-zero emissions targets aligned with the Science Based Targets initiative (SBTi), with formal submission planned by 2026.

Most climate impacts come from value chain emissions (Scope 3), which exceed 97% of total GHG emissions.

These emissions are mainly from purchased goods and services, such as third-party IT services, business travel, and employee IT equipment. Nitor has no direct emissions (Scope 1), and Scope 2 emissions from purchased electricity and heating are low due to renewable energy use.

Starting in 2025, Nitor will adopt a more data-driven approach to climate action. Our new financial management system will offer detailed procurement and supplier data, allowing us to move from spend-based estimations to precise distance-based and supplier-specific calculations. This will ensure accurate Scope 3 tracking and improve the validity of our emissions data, establishing a solid basis for informed, measurable, and transparent climate action.

Our Science Based Targets -journey

- ✓ Committed 2024
- ○ Near-term emission targets by end of 2026
- ○ Net-zero emission targets by end of 2026
- ○ Transition plan by end of 2026
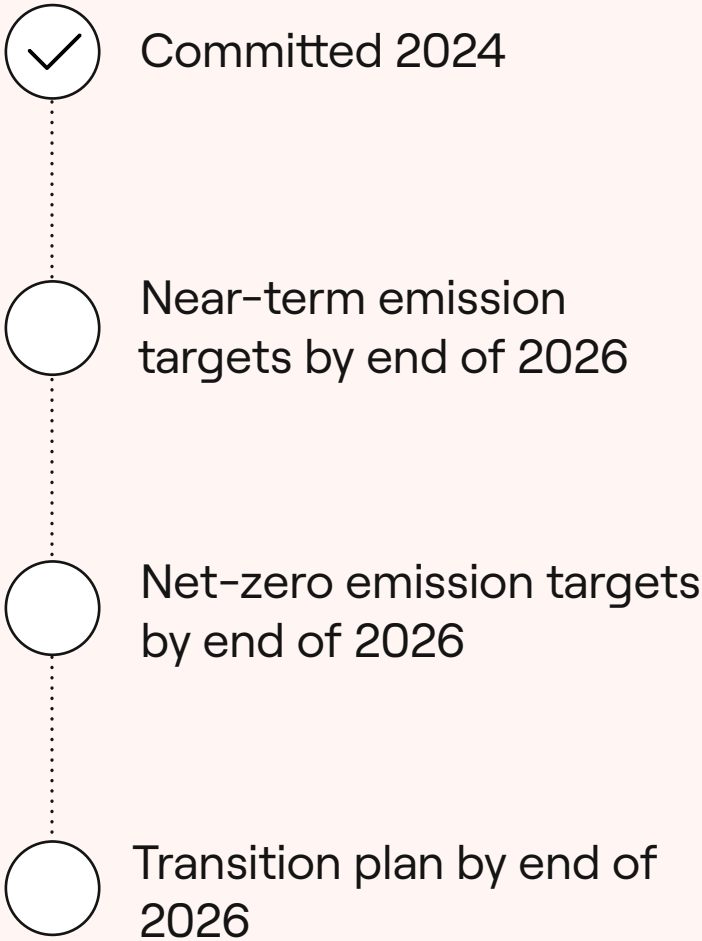
Our climate emissions

Our total greenhouse gas emissions | 1026.6 tCO2e

SCOPE3
Category 5
Waste generated
in operations

3.5 tCO2e

SCOPE3
Category 7
Employee
commuting

28.5 tCO2e

SCOPE3
Category 2
Capital goods

30.4 tCO2e

SCOPE3
Category 6
Business travel

147.4 tCO2e

SCOPE3
Category 1
Purchased goods
and services

787 tCO2e

SCOPE2
Purchased heating
and energy

29.8 tCO2e

● SCOPE 1 | 0 % | 0.0 tCO2e   ● SCOPE 2 | 3 % | 29.8 tCO2e   ● SCOPE 3 | 97 % | 996.8 tCO2e
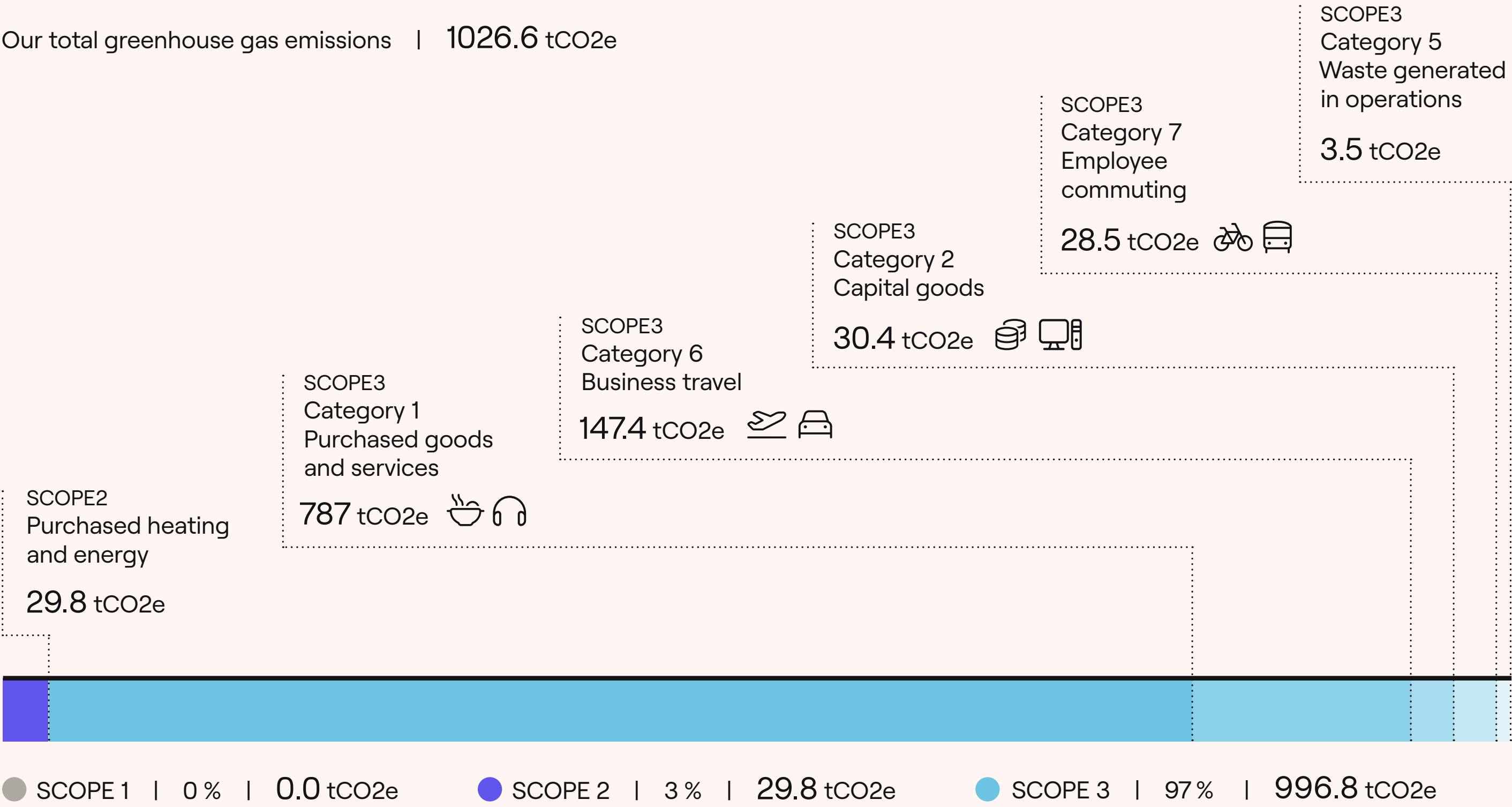
Climate change – Material impacts, risks and opportunities (E1.SBM-3)

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

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

The main impacts include emissions from the digital value chain and positive effects on energy efficiency through cloud and data expertise. Adaptation showed no direct environmental or social impacts. For Nitor's business, adaptation offers opportunities to develop climate-resilient solutions with customers. Mitigation enables low-impact digital services. Energy efficiency is a clear opportunity to enhance the sustainability of customer solutions.

TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
Climate change adaptation Adaptation of business strategies, operations, and infrastructure to respond to the impacts of climate change	–	⊕ **OPPORTUNITY: CLIMATE RESILIENT BUSINESS** Through collaboration with our customers, we can leverage our digital development expertise to create innovative solutions that support climate adaptation, strengthen brand loyalty, and open new business opportunities in the short to medium term.
Climate change mitigation Reduction or prevention of greenhouse gas emissions, including setting targets, reduction plans, and alignment with international climate goals	⊗ **NEGATIVE IMPACT: DIGITAL VALUE CHAIN EMISSIONS** Our business activities, operations and the value chain contribute to greenhouse gas emissions and negatively impact climate change mitigation efforts. As we create digital solutions for our customers, the emissions associated with them may be less visible but account for an increasing portion of emissions.	⊕ **OPPORTUNITY: LOW-IMPACT DIGITAL SERVICES** Integrating energy-efficient coding practices into our customers' software solutions helps reduce carbon emissions associated with software development and operation, and we expect positive medium-term outcomes.
Energy Energy usage, detailing the sources, efficiency measures, and transition efforts towards renewable energy	⊗ **POSITIVE IMPACT: OPERATIONAL EFFICIENCY** By leveraging our strong cloud and data expertise in customer projects, we help improve the energy efficiency of digital solutions, supporting the efficient use of energy in both the short and medium term.	–

Climate impact and risk assessment process (E1.IRO-1, E1-9, E1.GOV-3)

Nitor has defined time horizons- short-term, medium-term, and long-term- for assessing climate risk. However, it has not identified climate-related hazards for these timeframes nor has Nitor assessed whether its assets and activities may be exposed to them.

Consequently, the extent of exposure and sensitivity to potential climate-related hazards has not been assessed. Furthermore, identifying and assessing hazards have not been based on high-emission climate scenarios. Nitor has not conducted a formal climate scenario analysis on physical climate risks; thus, scenario-based insights are absent in evaluating these risks.

Given Nitor's business model as a digital consultancy, its direct exposure to physical climate risks is limited. However, indirect risks—such as climate-related disruptions to energy supply or cloud infrastructure—may impact service continuity. These factors are addressed within broader risk management and business continuity frameworks.

Nitor's business operations are not linked to material physical or transition risks.

Climate-related considerations are not currently integrated into the remuneration policies or incentive structures for members of Nitor's administrative, management, or supervisory bodies.

Climate commitments (E1–1, E1-2, E1-4)

Transition plan for climate change mitigation

Nitor does not currently have a formal climate transition plan in place. However, we are committed to developing one in alignment with the Science Based Targets initiative (SBTi). As the majority of our emissions arise from Scope 3, we will focus on improving data accuracy, engaging with suppliers, and identifying effective emission reduction opportunities within our value chain. The plan will include near-term and net-zero targets covering Scopes 1, 2, and 3 and is scheduled for completion and submission by the end of 2026.

In parallel, we support climate and nature-related objectives through Beyond Value Chain Mitigation (BVCM) activities, as encouraged by SBTi. BVCM refers to voluntary actions taken to mitigate greenhouse gas emissions outside a company's value chain, such as forest conservation, ecosystem restoration, and nature-based climate solutions. While these actions do not contribute to science-based target achievement, they play an important role in helping to meet global climate goals.

In 2024, Nitor supported biodiversity and environmental restoration by contributing to the Finnish Natural Heritage Foundation (Luonnonperintösäätiö), which protects old-growth forests in Finland through permanent land conservation, and the John Nurminen Foundation, which works to safeguard the Baltic Sea and its cultural heritage. These initiatives reflect our commitment to broader climate responsibility beyond our value chain.

Climate mitigation and adaptation policies

Nitor's environmental policy, together with our environmental management system, addresses key sustainability matters related to climate change, energy efficiency, and the use of renewable energy. It also covers principles of waste management and recycling, water preservation, environmentally friendly travel and purchasing practices.

These principles guide our efforts to reduce the environmental impact of operations and promote sustainable digital services. The Sustainability Director is responsible for implementing the policy and overseeing how environmental guidelines are applied across the organisation.

Climate-related targets

Nitor has not yet established climate-related mitigation or adaptation targets. However, we are committed to developing science-based targets aligned with the Science Based Targets initiative (SBTi). These targets will include both near-term and net-zero objectives. Once in place, they will guide our decarbonization efforts.

Energy and emission data (E1-5, E1-6)

Energy consumption and mix

Nitor's total energy consumption related to its operations was 134,496.03 kWh during the reporting period. Of this amount, 133,462.63 kWh, representing 99.23%, was sourced from renewable energy, primarily through purchased or acquired electricity, heat, steam, and cooling.

Gross Scopes 1, 2, 3 and Total GHG emissions

Nitor reports its greenhouse gas (GHG) emissions according to the GHG Protocol Corporate Standard, utilising the operational control approach to establish the reporting boundaries. The consolidated emission calculations include all subsidiaries.

Scope 1 emissions are zero because Nitor does not operate facilities that produce direct emissions. Scope 2 emissions, resulting from electricity and heating purchases, are low due to the utilisation of renewable energy sources. The majority of emissions fall under Scope 3, which includes activities throughout the upstream and downstream value chain.

Scope 3 emissions were calculated following the GHG Protocol Corporate Value Chain (Scope 3) Standard. This calculation method utilises a mix of spend-based estimations, activity-based data, and secondary emission factors from recognised sources. In instances where primary data was not accessible, secondary data – defined by the GHG Protocol as information not originating from specific activities within the reporting company's value chain – was employed.

Nitor used the WWF Green Office calculation framework for 2024 as the primary source of emission factors. This framework consolidates data from several reliable sources, including Statistics Finland (Tilastokeskus), the Finnish Environment Institute (SYKE), South Pole, etc. For spend-based calculations, the Carbon Wise database 2024 was applied, using index-adjusted emission values originally derived from the SYKE report by Nissinen et al. (2019, report 15/2019). For IT equipment purchases, supplier-specific emission factors were used where available, drawing from published lifecycle data provided by manufacturers such as Apple or Samsung.

In 2024, Nitor's greenhouse gas emissions intensity was 25.6 tCO2e per million euros of net revenue based on location-based emissions, and 25.4 tCO2e per million euros based on market-based emissions. These intensity figures were calculated using a net revenue of 40.446 million euros.

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	39.4 tCO2e	
GHG emissions scope 2 market-based	29.8 tCO2e	2.9%
GHG emissions scope 3	996.8 tCO2e	97.1%
GHG emissions total (market-based)	1026.6 tCO2e	

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

TYPE	GHG EMISSIONS	%
1. Purchased goods and services	787.0 tCO2e	79.0%
2. Capital goods	30.4 tCO2e	3.0%
3. Fuel- and energy-related activities	0.0 tCO2e	
4. Upstream transportation and distribution	0.0 tCO2e	
5. Waste generated in operations	3.5 tCO2e	0.4%
6. Business travel	147.4 tCO2e	14.8%
7. Employee commuting	28.5 tCO2e	2.9%
8. Upstream leased assets	0.0 tCO2e	
9. Downstream transportation and distribution	0.0 tCO2e	
10. Processing of sold product	0.0 tCO2e	
11. Use of sold products	0.0 tCO2e	
12. End-of-life treatment of sold products	0.0 tCO2e	
13. Downstream leased assets	0.0 tCO2e	
14. Franchises	0.0 tCO2e	
15. Investments	0.0 tCO2e	

Our people

Social

As digital transformation redefines businesses and our way of working, attracting, supporting, and retaining skilled professionals is essential for long-term success. We invest in our people's well-being, growth, and engagement by fostering a culture of inclusiveness, meaningful work, and sustainable ways of working.

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. Nitor's 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 and capacity building.

Average training hours

88.8 h

2024

Own workforce - Material impacts, risks and opportunities (S1.SBM-3)

TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
Secure employment	⬆ **POSITIVE IMPACT: RETAIN TALENT** Emphasising employment stability and career growth fosters a positive work environment, enhances employee loyalty and job satisfaction, and supports the long-term retention of skilled workers.	
Social dialogue	⬆ **POSITIVE IMPACT: SHARED OWNERSHIP** By involving employee representatives and staff in decision-making forums, we cultivate a greater sense of belonging and enhance workforce engagement.	⊕ **OPPORTUNITY: COMMUNICATION CULTURE** Enhancing internal communication and encouraging open dialogue can boost employee satisfaction and improve retention, yielding anticipated benefits in the short to medium term.
Work-life balance	⬆ **POSITIVE IMPACT: SUSTAINABLE PACE** Maintaining a sustainable pace of work and avoiding overload supports employee well-being and work-life balance. It also contributes to attracting and retaining top talent, with positive impacts expected in the short to medium term.	❗ **RISK: WORK-LIFE IMBALANCE** Failure to address work-life balance and meet employee expectations may lead to declining well-being, reduced productivity, and increased difficulty in attracting and retaining talent, potentially resulting in financial consequences over the medium to long term.
Health and safety	⬆ **POSITIVE IMPACT: WORKPLACE WELL-BEING** A strong focus on employee health and safety and comprehensive health benefits fosters a secure work environment while enhancing our employees' well-being and long-term commitment.	❗ **RISK: HEALTH IMPACT** Sustained work-related stress, lack of mental health support, or insufficient recovery time may contribute to mental health deterioration among employees. Unaddressed issues may lead to increased sick leave, reduced performance, long-term disability, and loss of experienced talent.

TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
Gender equality and equal pay	**⬇ NEGATIVE IMPACT: GENDER BIAS AND UNEQUAL INCLUSION** Gender bias and unequal inclusion in the IT industry can lead to underrepresentation of women and marginalised groups in technical and leadership roles. This can result in a lack of diverse perspectives, reduced innovation, and a work environment that may feel unwelcoming or exclusionary.	**⊕ OPPORTUNITY: GENDER REPRESENTATION** Recruiting women into senior roles, including leadership positions, advances progress towards gender equality goals, fosters diversity, equity, and inclusion within the workforce, and drives better business outcomes by bringing a wider range of perspectives to decision-making, with benefits expected in the short and long term.
Training and skills development	**⬆ POSITIVE IMPACT: COMPETENCE GROWTH** Through continuous investment in market-relevant skills, we enhance our ability to serve customers effectively, support the professional growth of our employees, and attract top talent who value development opportunities, generating positive impacts in the medium to long term.	
Diversity		**⊕ OPPORTUNITY: INCLUSIVE WORKPLACE** Promoting diversity by increasing the representation of women in roles beyond design, such as development, brings diverse perspectives that enhance problem-solving and innovation, helping to address skills shortages and meet evolving customer demands, with anticipated benefits in the medium to long term.

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.

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. A shared sense of ownership and community is fostered through employee engagement, which is supported by key benefits such as extensive occupational health services and paid leave from the beginning of employment. Employee happiness remains a central performance indicator, reinforcing both internal culture and customer satisfaction.

We recognise risks such as gender bias and unequal inclusion in the IT sector, and actively address these through internal dialogue, training, and policy development. Opportunities lie in fostering innovation and retention through diversity, internal communication, and inclusive practices. There are no significant risks of child or forced labour in our operations.

Nitor's workforce

Nitor's workforce includes full-time, part-time, and fixed-term employees based in Finland and Sweden, as well as subcontractors and independent professionals. All individuals who may be materially impacted by our operations are included in the scope of disclosure.

Employees gender distribution

17 %   Female

82 %   Male

1 %   Other
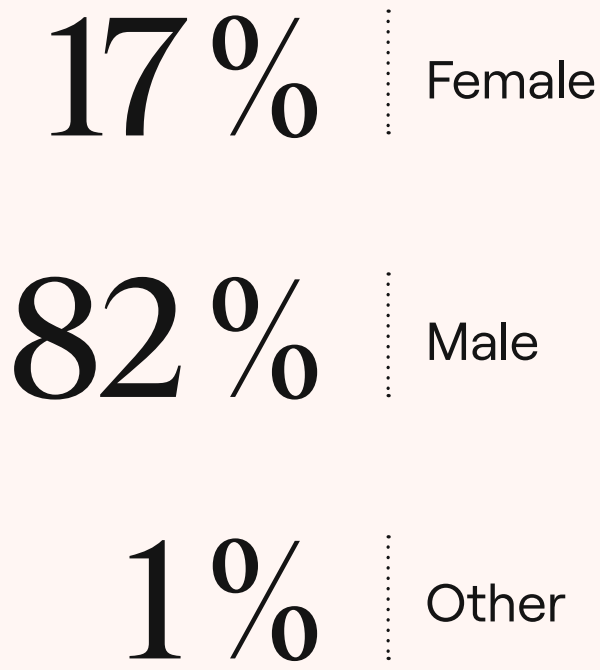
Gender distribution of employees at top management level

8.3 %   Female

91.7 %   Male
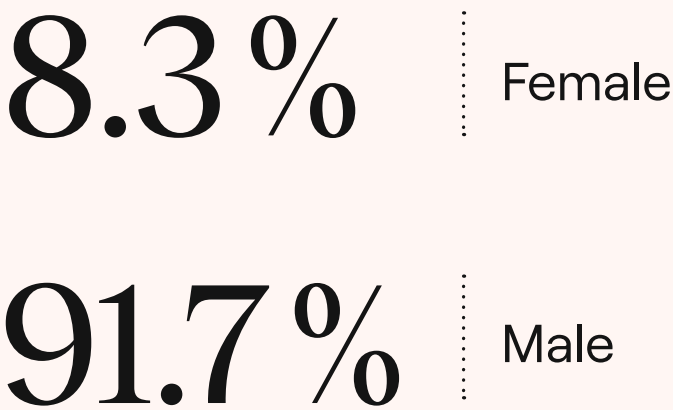
Our policies and plans (S1–1)

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 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 addresses risks of exclusion or bias based on characteristics including gender, age, origin, disability, sexual orientation, beliefs, and other personal factors. It promotes 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 for all employees.

Employee engagement and insights

We maintain an open and participatory approach to workforce engagement. Employee representatives are involved in the Leadership Team, ensuring that employee perspectives are integrated into strategic decision-making. Regular feedback is gathered through an employee experience survey. In addition, we hold open invitation Culture meetings bi-weekly, providing a forum for open discussion about various themes across the organisation.

Nitor regularly monitors workforce data, conducts pulse surveys, and tracks employee well-being, equity in development opportunities, and inclusion. Insights from these processes help inform the development and continuous improvement of our policies and practices.

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.

Diversity, Equity, Inclusion and Belonging

To address discrimination, Nitor has an Equality and Non-Discrimination Plan and Safer Space Guidelines, promoting equal opportunities and a culture of respect and inclusion. Diversity, Equity, Inclusion, and Belonging (DEIB) training is provided for all employees, including managers and recruiters, to embed inclusive practices into leadership and hiring processes.

Specific policies related to inclusion ensure positive action for vulnerable groups, such as gender and language minorities, contributing to a more inclusive and supportive work environment. Nitor implements specific procedures to prevent, mitigate, and act upon discrimination. The Director of People Operations is responsible for the implementation of these procedures. The Code of Conduct and Equality and Non-Discrimination Plan prohibit discrimination on legally protected grounds. These commitments are reinforced through accessible workplace designs, confidential reporting channels, and educational initiatives.

Engaging with our workforce (S1-2, S1-3)

Employee feedback and input play a key role in managing both actual and potential impacts on our workforce. We integrate employee perspectives into our decision-making through internal communication channels and recurring surveys, gathering feedback on working conditions, well-being, and emerging concerns. Insights from surveys and ongoing dialogue are reviewed and inform actions such as policy updates, workplace improvements, and support programs. Our People Team function holds operational responsibility for ensuring consistent and effective workforce engagement. Our Leadership Team and CEO ensure 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 The Homefront survey to gather insights from employees' loved ones about how work-life balance and work environment are seen from the outside.

Meetings and mentoring

We engage with our workforce both directly and through employee representatives, maintaining open company meetings where our employees can provide input on various topics and projects. Every employee also has the opportunity to reach the management level on their own at the office or through other internal channels. Monthly meetings serve as our primary communication method, offering regular opportunities for employees to hear about ongoing matters. Bi-weekly culture meetings provide a space to raise concerns and comments about the dedicated themes supporting ongoing cultural development. Additionally, annual face-to-face sessions with employees' superiors enable person-focused dialogue around company direction and workplace evolution.

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

In addition, insight is gained through open invitation meetings, face-to-face conversations, and 2-year anniversary interviews. Nitor's KAMU program, our internal peer-coaching program, provides employees with opportunities to raise issues in a supportive, confidential environment.

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 an accessible Whistleblower channel on our public website. Additionally, our employees have access to third-party mechanisms for addressing wellbeing and workplace concerns through 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.

People Strategy 2025-2028 (S1-4)

In 2024, we developed our People Strategy 2025–2028, which outlines action plans to address workforce-related impacts, risks, and opportunities. The strategy includes a target of NPS 70% among employees with the goal that no business unit falls below benchmark performance. Our proactive occupational health action plan focuses on prevention and early intervention to maintain our employees' health and work-life balance. We invest in ongoing skills development, including our Academy program, to ensure continuous learning and professional development. Additionally, our DEI initiatives and equality plan foster a diverse and inclusive workplace. These actions are integrated into Nitor's broader risk management framework, with oversight from the People Steering group to align with Nitor's strategic goals.

Risk-prevention and mitigating negative impacts

Our proactive approach to preventing and mitigating potential negative impacts centres on both community building and individual support. By prioritising comprehensive onboarding and community development, we establish a strong foundation for employee engagement. Our annual employee experience survey provides a review of employee sentiment, enabling targeted unit-specific action plans.

The wellbeing of our workforce is supported through an integrated occupational health plan, where our People team collaborates with occupational health services. In addition, our skills development plan focuses on maintaining employee professional growth.

To maintain transparency and cross-company discussions, we host regular open-invitation forums such as culture meetings and academy sessions, with employee representatives actively participating in decision-making through the Leadership Team meetings. Complementing our work-life balance initiatives, we've implemented a comprehensive workplace safety plan that further strengthens our commitment to overall employee well-being.

Investing in skills, inclusion, and motivation

Nitor is committed to positively impacting our workforce through an integrated approach to wellbeing and development. By promoting a culture of sustainable pace, we help our employees maintain a healthy work-life balance, supported by comprehensive benefits and extensive occupational health services for both physical and mental well-being.

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.

Nitor is focused on pursuing material opportunities to enhance its workforce capabilities and align with emerging market trends. We're investing in specialised education programs like green software development to prepare our workforce with environmentally sustainable technology skills, while forming strategic partnerships with organisations like Women in Tech and Inklusiiv to enhance diversity and inclusion within the tech industry.

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

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.

Data-driven development

To ensure our initiatives deliver meaningful results, we keep track of the data we collect that combines quantitative metrics with qualitative insights. Regular employee surveys form the foundation of our assessment approach, complemented by detailed health and insurance analyses that provide objective measures of well-being outcomes. We follow the employee retention rates, which serve as vital signals of workforce satisfaction and engagement.

Our professional development tracking extends across all learning platforms, measuring not only training hours invested but also engagement levels across our Academy, Core, and Mentoring programs. Additionally, certifications earned through internal programs indicate successful professional growth.

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. Our People team facilitates business unit-specific reviews, which enable a swift response to emerging issues. Recognising the value of open dialogue in this process, we are actively expanding our social dialogue capabilities to establish effective communication channels between leadership and employees, further strengthening our ability to detect and respond to workforce concerns proactively in the future.

To prevent negative impacts, Nitor implements clearly defined actions and specific goals that minimise potential risks. We foster open communication and address tensions between business pressures and the need to prevent negative impacts on our employees. This is done through transparent dialogue and regular evaluation through surveys, helping to balance operational goals with employee wellbeing.

The People Steering Team plays a key role in overseeing the management of workforce-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.

Training and Skills Development metrics (S1–13)

| TYPE	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees that participated in regular performance and career development reviews	41	200	0	0	241
Percentage of employees that participated in regular performance and career development reviews	16	80	0	0	96
Average number of training hours per person	N/A	N/A	N/A	N/A	88.8

Targets related to own workforce (S1-5)

Nitor has established specific targets to address key workforce issues and opportunities, ensuring alignment with our commitment to a sustainable and diverse workforce. We track progress against these targets through regular performance reviews and updates, maintaining continuous improvement and alignment with our strategic goals. These targets are specifically designed to address key workforce issues and opportunities, ensuring we remain aligned with our commitment to a sustainable and diverse workforce.

Nitor has not directly involved the employees or employee representatives in the process of setting targets. While we actively listen to our employees through various channels, they have not been part of the formal process for defining the metrics or targets themselves.

Regarding our performance evaluation and improvement identification, we engage our workforce through complementary approaches. Our annual employee experience survey results are shared with employees,

providing insight into how well we meet our employee satisfaction benchmarks. Similarly, we present our diversity, equity, inclusion, and belonging survey findings to our employees, ensuring transparency around progress and experiences on DEIB goals. These surveys help inform our understanding of progress and areas for improvement.

Nitor engages its workforce in identifying lessons and improvements through regular reviews of feedback and survey results. The annual employee experience survey results are discussed in monthly meetings for general communication and in more in-depth dialogue in biweekly Culture meetings. These meetings foster two-way conversations about findings and potential improvements. Additionally, our People team reviews monthly pulse surveys to analyse trends in employee satisfaction. For DEIB results specifically, a dedicated working group analyses the feedback and defines actionable steps, ensuring that lessons learned translate into meaningful actions.
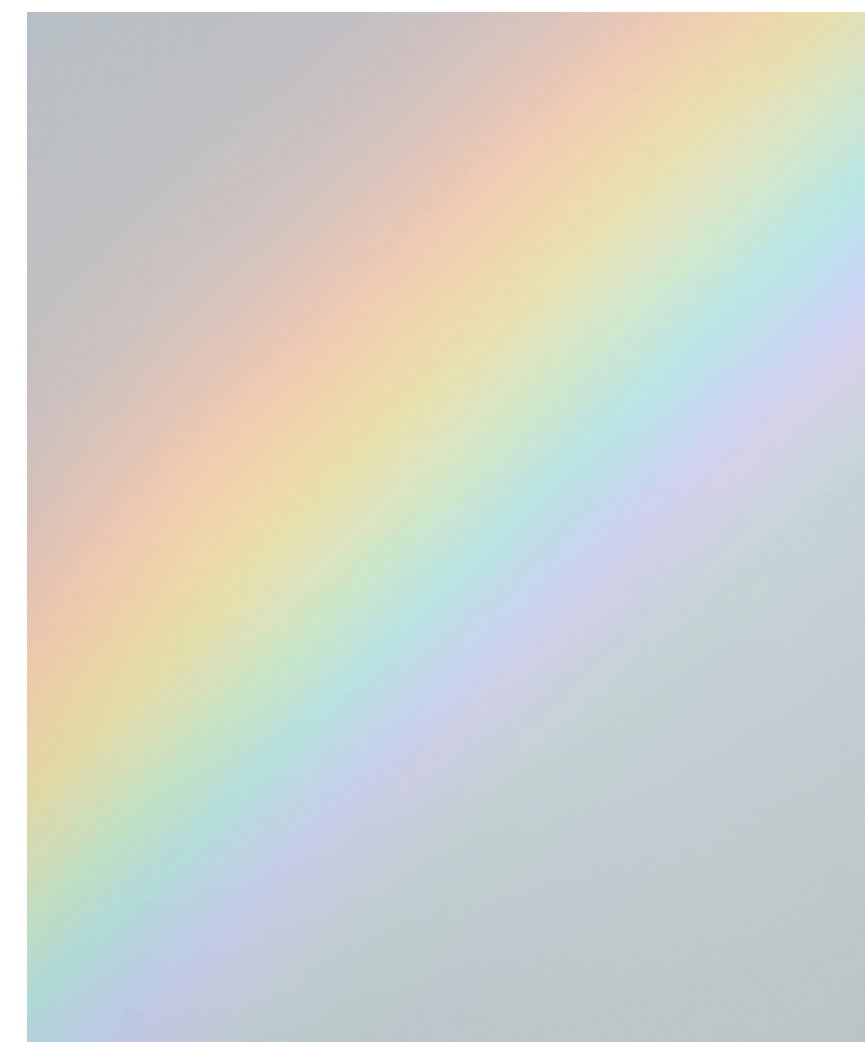
Who are we at Nitor? (S1-6, S1-7, S1-12)

Our employees by gender

GENDER	NUMBER OF EMPLOYEES
Female	42
Male	207
Other	2
Not disclosed	0
Total employees	251

Our employees by contract type

TYPE	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees	43	206	2		251
Number of permanent employees	41	206	2		249
Number of temporary employees	2	0	0		2
Number of non-guaranteed hours employees	2	0	0		2
Number of full-time employees	41	206	2		249
Number of part-time employees	2	0	0		2

Our employees by countries

COUNTRY	NUMBER OF EMPLOYEES
Finland	234
Sweden	17

In the reporting period, 17 employees left Nitor, resulting in an employee turnover rate of 9%. Employee numbers are reported using a head-count method. Nitor's own workforce included 50 non-employees, reported by headcount. Of these, 15 were self-employed individuals. The most common types of non-employees were self-employed professionals and individuals working through subcontracting companies. These figures reflect the situation at the end of the year.

Persons with disabilities amongst employees

TYPE	NUMBER	PERCENT
Persons with disabilities amongst employees, subject to legal restrictions on collection of data	0	0

Number of non-employees

TYPE	NUMBER
Number of non-employees in own workforce	50
Number of non-employees in own workforce – self-employed people	15

Diversity metrics (S1-9)

At Nitor, top management refers to the members of the Leadership Team, which includes the CEO and the heads of key business and operational areas and employee representatives. This group is responsible for company-wide strategic decision-making, financial oversight, and the organisation's overall direction.

Top management team

TYPE	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees at top management level	1	11	0	0	12
Percentage of employees at top management level	8 %	92 %	0 %	0 %	

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	28	190	33	251
Percentage of employees	11 %	76 %	13 %	

Wages, social protection and collective agreement (S1-8, S1-10, S1-11, 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 as if it were binding, 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). Additionally, all employees are covered against income loss due to unemployment, employment injury, acquired disability, parental leave, and retirement.

All Nitor employees are entitled to family related leaves through social policy and collective bargaining agreement.

Proportion of employees entitled to family leave

TYPE	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Percentage of employees entitled to take family-related leave	100	100			100
Percentage of entitled employees that took family-related leave	Not separated from other leaves				

Health, safety, remuneration and human rights metrics (S1-14, S1-16, S1-17)

During the reporting period, Nitor reported zero fatalities and zero recordable work-related accidents among its own workforce, as well as zero fatalities among other workers operating on its sites. Consequently, the rate of recordable work-related accidents was 0%, and there were no days lost due to work-related injuries, ill health, or fatalities.

Gender pay gap

TYPE	PERCENT
Gender pay gap	2% (exact 2,06 %)
Annual total remuneration ratio	16,4 (exact: 16,35)

Incidents of discrimination

TYPE	AMOUNT
Number of incidents of discrimination	0
Number of complaints filed through channels for people in own workforce to raise concerns	0

In 2024, Nitor received zero complaints filed to National Contact Points for OECD Multinational Enterprises, incurred no fines, penalties, or compensation payments related to incidents of discrimination or harassment, and reported no severe human rights issues or incidents connected to its own workforce.

Consumers and end-users

Social

Digital services increasingly shape daily life, which means that expectations for usability, accessibility, and trust are also constantly growing. We assist our clients in delivering high-quality, inclusive, and secure digital solutions that provide meaningful value for their customers and end-users.
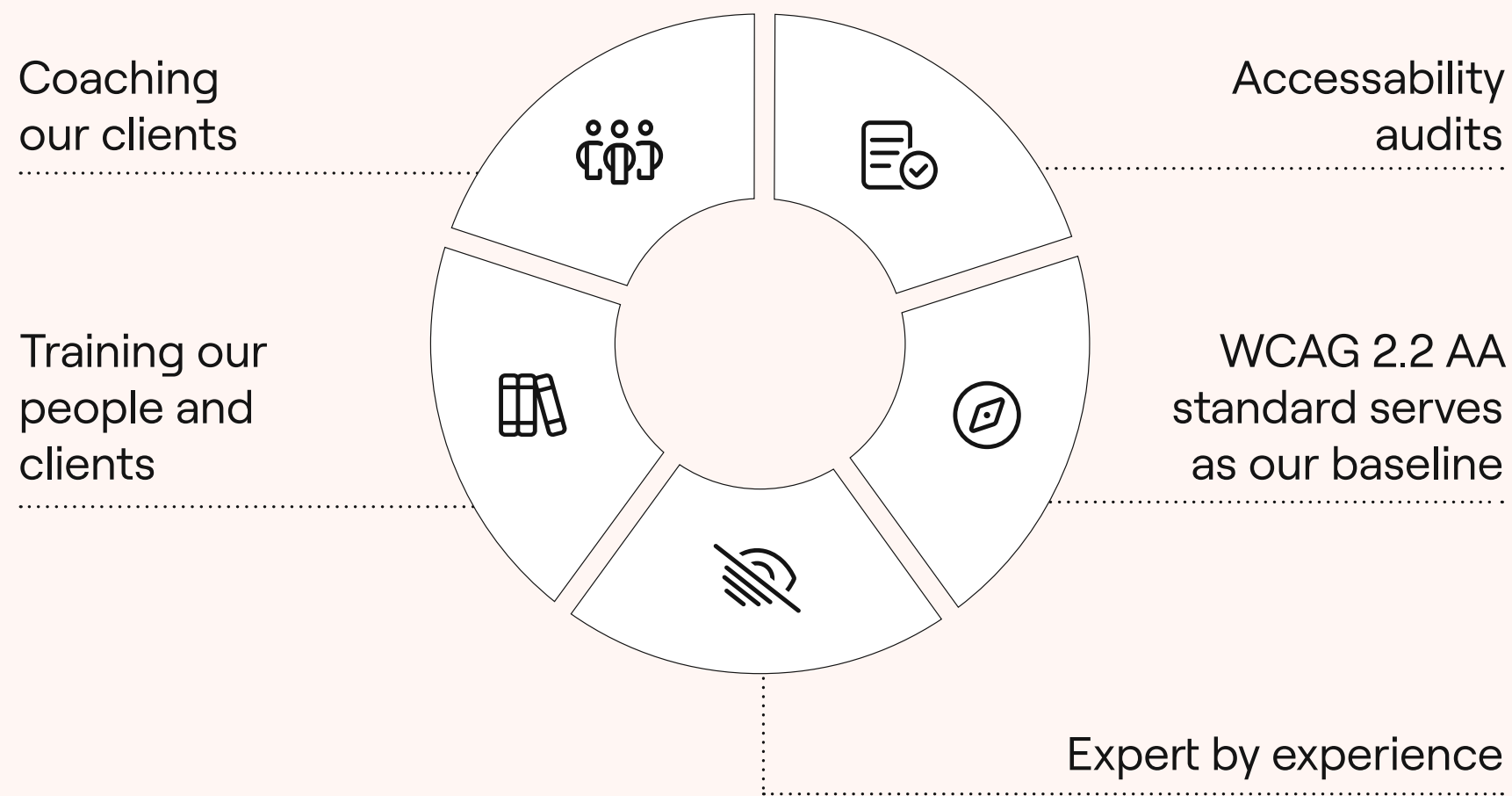
Empowering accessible and inclusive digital experiences

Nitor emphasises accessibility and information security throughout the design, development, and delivery of digital services. While we do not work directly with end-users, we collaborate closely with our client organisations and recognise that digital solutions have a significant impact on their consumers and end-users.

Accessibility is one of our key focuses in employee development, which we support with certification opportunities and dedicated learning time. We apply a holistic approach that combines continuous skill-building with assisting clients in developing organisational maturity on accessibility. Additionally, we provide accessibility consulting and training services to clients. Our practices align with the WCAG 2.2 AA standard and involve users with lived experience in project teams to ensure that digital services are inclusive, usable, and accessible to all. We also have 48 W3C-certified employees, of whom two have broader certifications (WAS/CPACC).

Information security is equally central to our responsibility towards our clients and their customers. While our clients typically manage end user data, Nitor aligns with the ISO/IEC 27001:2022 standard and ensures secure development practices across all client projects, safeguarding the confidentiality, integrity, and privacy.

Our approach to accessibility

Coaching our clients

Accessability audits

Training our people and clients

WCAG 2.2 AA standard serves as our baseline

Expert by experience

Consumers and end-users - Material impacts, risks and opportunities (S4.SBM-3)

TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/ OPPORTUNITIES
Information-related impacts for consumers and/or end-users	⬆ **POSITIVE IMPACT: DIGITAL TRUST** Nitor develops secure, privacy-focused digital services by applying secure-by-design and privacy-by-design principles in collaboration with clients. Information security requirements are defined at the start of the project based on data sensitivity, confidentiality, integrity, availability needs, and applicable legal or contractual obligations.	
Social inclusion of consumers and/or end-users	⬆ **POSITIVE IMPACT: INCLUSIVE ACCESS** Positive impact: By focusing on accessibility in the solutions we co-create with our clients, we help ensure that their products and services are usable by a broader range of consumers, including people with disabilities, support social inclusion goals and enhance customer satisfaction over the medium to long term.	

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

Regarding the consumers and end-users, we recognise two positive impacts: Digital trust and inclusive access. Strong accessibility and privacy practices enhance client differentiation, inclusion, and regulatory alignment. No negative impacts on consumers or end-users have been reported during the reporting period.

As a digital consultancy and trusted partner to our clients, information security is a key element of our operations and is embedded in our business strategy, risk management, and governance. We have established the necessary measures to prevent and mitigate risks, supported by a defined incident response process that ensures timely resolution and restoration of secure operations.

We ensure positive impacts by embedding accessibility into the development process and integrating WCAG 2.2 AA standards along with feedback from customers with lived experience. Through experience, audits, and training, we have built a strong understanding of various customer groups. This insight is applied to proactively mitigate the risks of harm in product design.

Our consumers and end-users vary

Nitor defines consumers and end-users as individuals interacting with digital services designed for our clients, covering both the public using customer-facing solutions and internal employees within client organisations. Although direct engagement with customers is limited, we gather their perspectives through client-led user testing, collaboration with customer research experts, and project-specific feedback. Issues are usually addressed through client mechanisms and continuous iteration.

All groups affected by Nitor's client projects are included in this disclosure. These users vary in digital literacy, needs, and accessibility. While customers access services via our clients, Nitor's design and development choices affect key aspects of their digital experience.

Responsibilities are integrated across functions (S4-1)

Nitor embeds the protection of consumer and end-user rights directly into its day-to-day operations instead of relying on one, standalone policy. Responsibilities related to accessibility and information security are integrated across functions and project delivery, ensuring that user needs and rights are actively considered throughout the service development process.

Nitor's information security management practices align with the ISO/IEC 27001:2022 standard and apply to all client projects. These practices ensure the confidentiality, integrity, and availability of personal data, even though end user data is typically controlled by clients.

Nitor is committed to upholding human rights defined by the UN Global Compact's Ten Principles, including the rights to access, safety, and non-discrimination. These principles are reflected in our Code of Conduct and in how we design, build, and deliver digital services.

Interaction with consumers and end-users (S4-2, S4-3)

Nitor typically does not interact directly with consumers and end-users, as we provide services through client organisations that maintain that primary relationship. However, during project work, our digital consultants often engage with consumers and end-users, especially during concept development and customer understanding and usability testing. This allows us to indirectly integrate their perspectives into product design in close collaboration with our clients.

Engagement typically occurs during the design and development phases of digital services. While engagement is primarily led by client organisations, Nitor supports the process by contributing to user workshops, facilitating interviews, and advising on testing methods. These interactions help ensure that digital services meet the accessibility and usability needs of diverse customer groups.

While Nitor does not independently assess the effectiveness of engagement or hold operational responsibility for stakeholder engagement processes, we support our clients, who maintain primary responsibility, in gathering insights and refining their approaches. We also leverage our experience and industry knowledge to gain a deeper understanding of user perspectives and ensure that their needs are fully reflected in the final service.

Whistleblowing

A public whistleblowing channel is available for broader concerns regarding Nitor. The channel allows for anonymous reporting. No complaints from consumers or end-users were received during the reporting period. Nitor does not operate other direct channels for consumers or end-users. When relevant, concerns are addressed in coordination with clients.

Capacity building to manage risks and pursue material opportunities (S4-3, S4-4, S4-5)

Nitor guarantees that its digital consultancy services produce beneficial results for customers while reducing risks related to accessibility, usability, and information security. We see capacity building as a core element in reducing risks and pursuing opportunities related to consumers and end-users. We learn from project execution, user feedback, and the continual monitoring of changing regulations and client requirements. To improve our value chain, we advocate for inclusive and secure digital practices in all client interactions. Additionally, we participate in community knowledge sharing through events and forums to remain updated with industry best practices.

As of 2024, no human rights issues or formal grievance cases from customers have been reported. Nonetheless, we continue to refine our processes and capabilities, ensuring we are ready to act responsibly and proactively if such situations arise.

Investments in accessibility during 2024

In 2024, we strengthened our accessibility efforts through training, new tools, and inclusive design practices—backed by a growing number of certified professionals. These initiatives resulted in more accessible and user-friendly digital services for our clients. No negative impacts caused by Nitor were reported, and our teams stood ready to respond, had issues arisen. We continue to pursue positive outcomes by helping clients deliver inclusive digital services, enabling them to reach and serve a broader, more diverse customer base. Our initiatives directly support Sustainable Development Goals 9 (Industry, Innovation, and Infrastructure) and 10 (Reduced Inequalities).

Risk-management structures

Key teams contributing to impact management include the Security and Privacy Team, leading privacy training and incident handling, and the Risk Management Team, evaluating risks affecting end-users. The Nitor Systems Administration (NSA) Team monitors performance indicators, assesses deviations, and implements improvements. Responses to issues are tailored through joint project governance structures. For internal concerns like information security breaches, Nitor relies on a robust incident response process and oversight from the Risk and Security teams.

At Nitor, we recognise that information security is vital for customer trust in our digital solutions. Our target is zero serious security incidents, reflecting the effectiveness of our protective measures. A serious incident has a significant impact on business operations, service availability, data security, or personal data privacy.
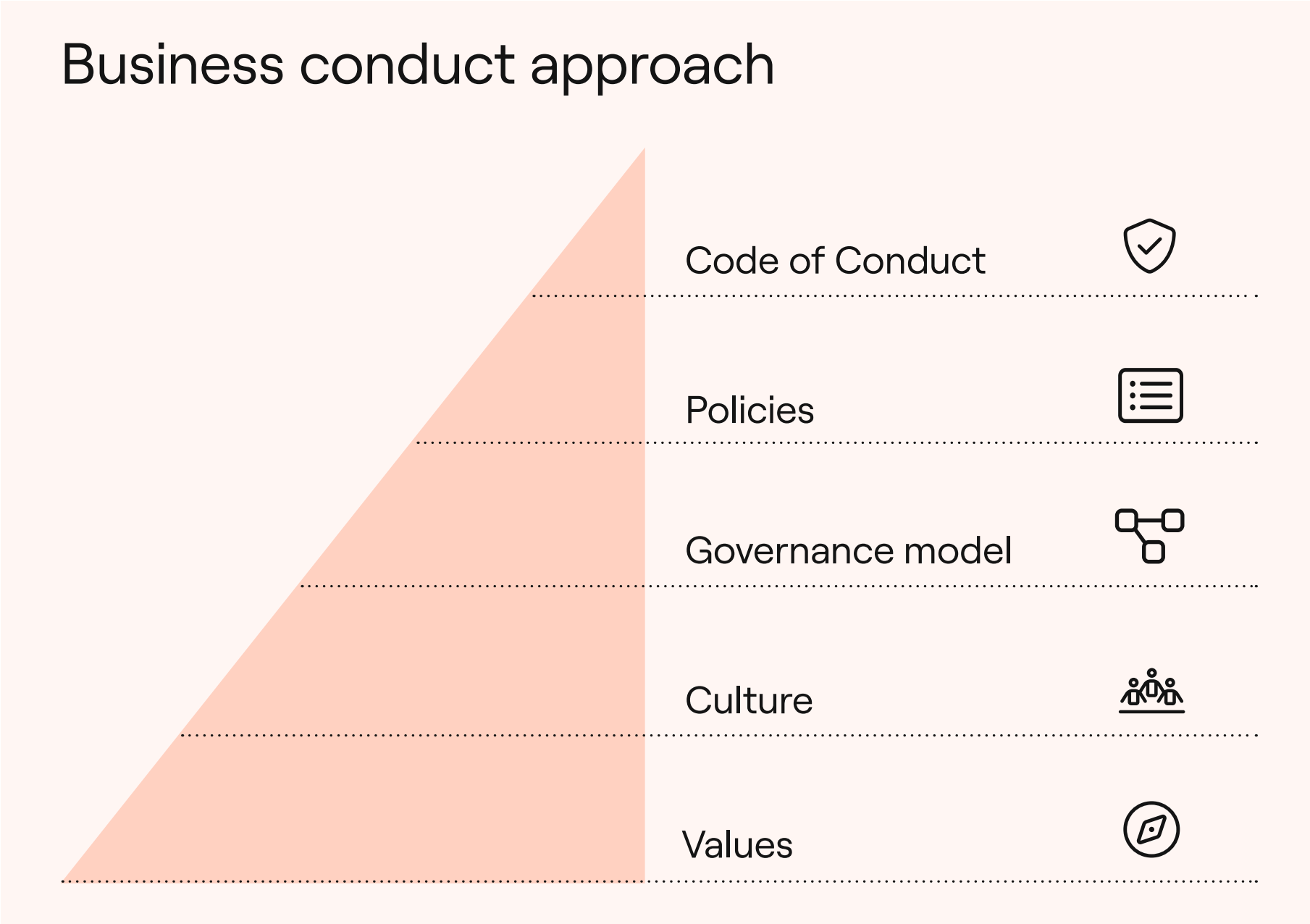
Business conduct

Governance

Businesses are under increasing pressure to demonstrate ethical conduct, driven by both compliance requirements and stakeholder expectations. We address this with a culture of integrity, accountability, and transparency embedded in our daily practices.

Ethics, people, and purpose guide our work

In 2024, Nitor formalised and strengthened its approach to ethical business conduct. As a digital engineering company committed to ethical action, we introduced a governance model with a documented Code of Conduct, Governance Code, and policies on anti-corruption, environmental responsibility, and risk management. These frameworks ensure integrity, accountability, and sustainability across Nitor's operations.

Nitor's purpose aligns with the success of employees and customers. We believe long-term success arises from happy employees and customers. By prioritising both and fostering a culture of mutual respect and trust, we have attained high customer satisfaction and received awards as one of Europe's best workplaces.

We are founded on values that continue to guide and support our daily work: Unity, Pragmatism, Passion, Agility, Efficiency and Effectiveness. These values reflect who we are as a company. They have evolved through our shared experiences and continue to shape how we collaborate, deliver value, and conduct ourselves ethically in all that we do.

Business conduct approach

- Code of Conduct
- Policies
- Governance model
- Culture
- Values

Business conduct – Impacts risks and opportunities

TOPIC	SOCIAL/ENVIRONMENTAL IMPACTS	FINANCIAL RISKS/OPPORTUNITIES
Corporate culture	**↑ POSITIVE IMPACT: STAKEHOLDER TRUST** Fostering a strong corporate culture grounded in ethical business practices strengthens our influence on industry standards and attracts like-minded partners and stakeholders. Through measures such as our Code of Conduct, whistleblower protection, and related governance policies and practices, we anticipate positive impacts in the short to medium term.	**❗ RISK: CULTURE DILUTION** Organisational growth or structural changes may threaten the maintenance of our established corporate culture. We mitigate this by actively integrating new employees through structured onboarding and mentorship programs and consistently reinforcing our values and expected behaviours across all levels of the organisation.

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

We recognise corporate culture as an important topic leading to both impacts and risks. The positive impact lies in building stakeholder trust, as ethical practices and clear governance—such as a Code of Conduct and whistleblower protection—enhance industry influence and attract aligned partners. However, a key risk is culture dilution due to growth or structural changes. Nitor addresses this by integrating new employees through onboarding, mentorship, and consistently reinforcing its values across the organisation.

The role of the administrative, supervisory and management bodies (G1.GOV-1)

At Nitor, the Board and the CEO are responsible for overseeing ethical business conduct. The Board ensures that integrity, compliance, and responsible practices are embedded in the strategy, operations, and risk management. The CEO manages implementation and delegates daily responsibilities to the Leadership Team.

Within the Leadership Team, the General Counsel leads governance and compliance, while the Director of People Operations is responsible for upholding ethical workplace practices and behavioural standards. The Sustainability Director supports this effort by ensuring that ethical and responsible business conduct is also reflected in Nitor's environmental and social sustainability practices and disclosures.

Business conduct policies and corporate culture (G1.MDP-P, G1-1)

Nitor manages its impacts, risks, and opportunities related to business conduct and corporate culture through established governance practices, with the Code of Conduct as the central framework. The Code sets clear expectations for ethical behaviour and promotes a respectful, inclusive, and transparent workplace. It is integrated into onboarding, internal communications, and governance processes to help identify and address potential issues at an early stage.

Nitor's anti-corruption efforts are guided by its Anti-Corruption Policy, which all employees are expected to follow. The policy incorporates key principles of anti-corruption and anti-bribery and is scheduled for finalisation in 2025. While employees are currently introduced to its contents during onboarding, structured training on anti-corruption and responsible conduct is being developed and will be rolled out in 2026.

Nitor fosters a values-driven culture that emphasises inclusion, a sustainable work pace, and responsible digital development. These principles are part of the Code of Conduct and reinforced through leadership behaviour, structured onboarding, peer mentoring, and transparent decision-making.

As the company expands, Nitor actively fosters its culture by integrating new employees into shared values and practices while embracing diverse perspectives that help evolve the culture. Employees influence strategic direction through feedback mechanisms and representation in the Leadership Team.

Culture is continuously assessed through annual employee experience surveys, monthly pulse surveys, and open forums, enabling early identification of engagement or behavioural risks and supporting a culture that adapts and grows with the organisation.

Nitor has implemented a whistleblowing channel on its website, operated by an independent provider. The system complies with the EU Whistleblower Protection Directive and relevant laws. Reports can be submitted anonymously and are handled confidentially. An independent response team investigates all concerns promptly and objectively, without retaliation.

Safeguards include confidentiality and protection against retaliation. Nitor is legally obligated to ensure whistleblower protection and complies with regulations.

Managing relationships with suppliers (G1-2)

Nitor's most significant social impacts on suppliers relate to subcontractors involved in client projects and, to a lesser extent, to workers in upstream procurement chains. These impacts are managed through responsible procurement practices, regular engagement, and clear expectations.

Nitor maintains close working relationships with its direct suppliers, particularly those in client delivery teams. Nitor's Supplier Code of Conduct outlines Nitor's expectations regarding ethical business practices, human rights, labour conditions, environmental stewardship, anti-corruption, and the ethical use of digital technology.

While it does not mandate full compliance at the outset, it encourages suppliers to align with these principles over time through mutual dialogue and development.
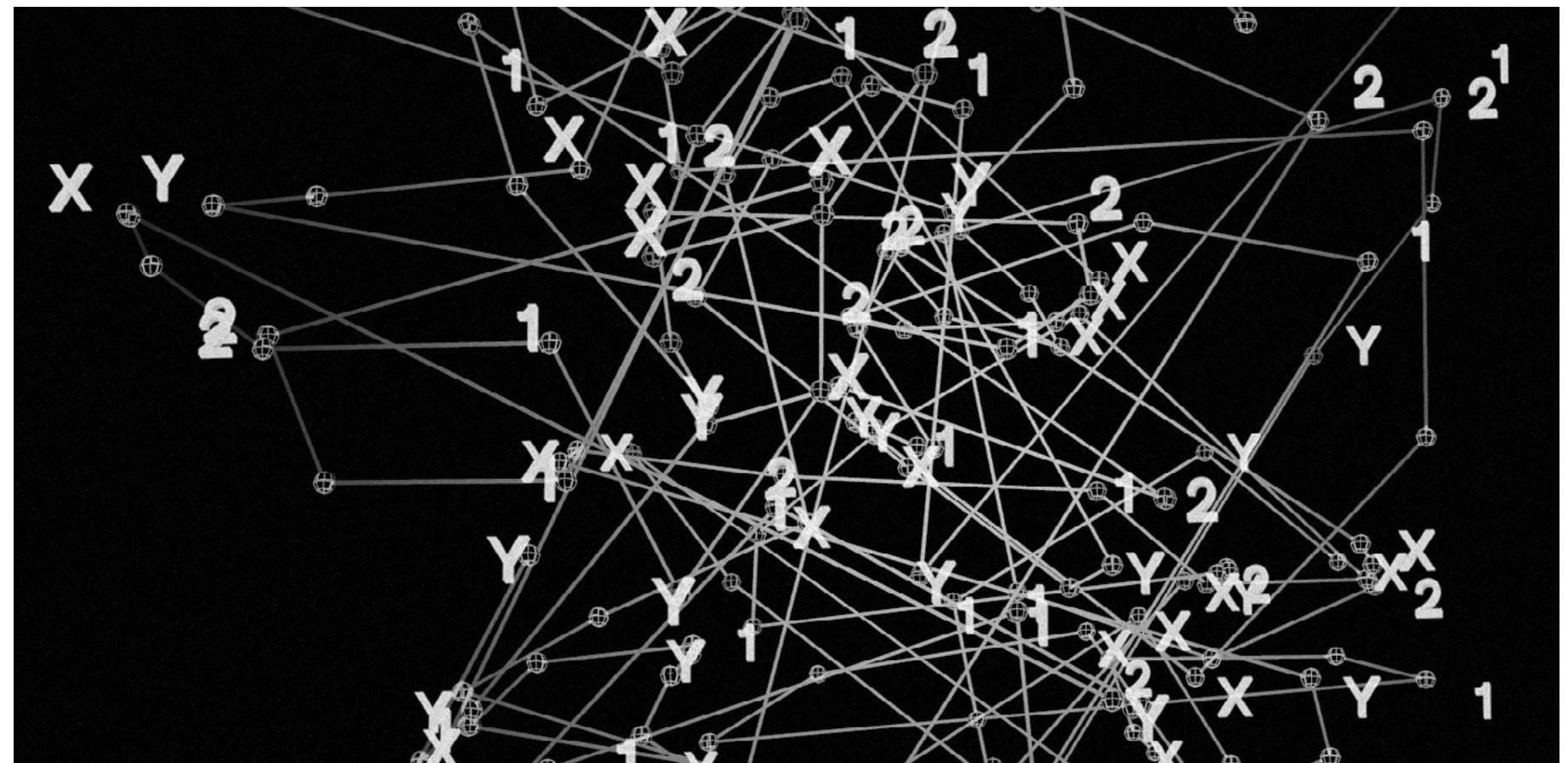
Corruption, bribery, and political involvement (G1-3, G1-4, G1-5)

Nitor has policies to prevent, detect, and respond to corruption and bribery. The Anti-Corruption Policy forbids all corrupt behaviour, including bribery—monetary or in-kind. Gifts and hospitality have specific controls: items over €50 must be recorded; those over €100 need approval; and no benefits can be exchanged during procurement or contract negotiations. Context and intent are assessed with monetary value.

Concerns or suspected violations can be reported through Nitor's confidential whistleblowing channel. A designated group, which includes an independent Board representative, a personnel representative, and the Occupational Safety and Health Manager, handles reports independently from management. Confirmed cases are escalated to senior management or the Board as necessary.

There were no reported or confirmed incidents of corruption, bribery, or other breaches of ethical business practices at Nitor during 2024. No legal proceedings related to such issues have been brought against the company or its employees.

Nitor does not engage in political lobbying or attempt to influence political decision-making.

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