



Document I.D.	Eficode Group ESG Policy Group ESG (Environmental, Social, Governance) Policy setting out our commitment to operate in a responsible manner.
Owner	Eficode Management Team
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Version n:o and Issue Date	Latest Review Date	Summary of Changes
v1.0 / 27 March 2024	27 March 2024	Initial version
V1.1 / 15 May 2025	12 May 2025	<ul style="list-style-type: none">• Section 5 added on materiality• Actions and focus areas updated in all sections as a result of materiality• Disclosure section updated to include CDP and EcoVadis

1. Definitions

“**Board**” means the Board of Directors of Eficode Group;



“Eficode Group” or **“Group”** means Eficode Holdings Oy and all (or any, as context may require) of the legal entities belonging to the same group of companies as it, as set out in the Finnish Accounting Act from time to time.

“Eficode People” means all Eficode employees and Eficode non-executive directors, such as the members of the Board of Directors and those individuals acting as Eficode’s authorised agents.

“ESG” means environmental, social, governance.

“Policy” means this group policy governing the responsible business practices in Eficode Group.

2. Purpose

This Policy formalises Eficode’s commitment to responsible business practices in the areas of:

- Environmental Stewardship
- Social Responsibility
- Governance, Ethics & Compliance

The Policy’s purpose is to ensure that the Eficode Group consistently operates in a responsible manner throughout its operations, effectively integrating ESG priorities into the Group’s strategy, decision making processes, design of solutions and services and in our relationships with our key stakeholders.

3. Scope

This policy applies to all Eficode People. In addition, all contractors, subcontractors and individuals acting in any capacity for or on behalf of Eficode must adhere to the spirit of the ESG policy through the Supplier Code of Conduct.

This Policy sets out the principles that apply to all our global operations, with no exceptions. It is also anticipated that certain geographies within Eficode Group may have the opportunity to set more ambitious objectives in alignment with these principles.

This Policy is not a static document. It evolves with the changing landscape of our industry and the continuous growth of our Group. It adapts to new challenges and opportunities, helping us navigate a complex world with ethics and integrity. This Policy will be reviewed at key



milestones throughout our ESG journey, in response to significant change, and at a minimum annually.

4. Principles

Our ESG Policy supports the Eficode mission, our company values, and contributes to achieving our strategic goals. In all we do, across our global operations, we are driven by our commitment to a sustainable and inclusive world, which is reflected in the development of the solutions that we deliver to our clients, our internal activities and in conjunction with our suppliers and partners.

By embedding ESG into our operations and offerings, we create value for our business by driving innovation, expanding our value proposition, deepening relationships with our stakeholders, attracting and retaining top talent, and reducing our financial risks.

We will continually increase our ESG performance, if we stay focused on the areas where we can have the greatest impact and evolve in the way we operate.

5. Materiality

Eficode's ESG strategy is guided by the materiality of ESG topics. Material topics are those topics that have been assessed by us as significant or having substantial influence on the decisions and assessments of stakeholders due to either their impact on the Eficode's value creation (financial materiality) and/or the impact we have on people and/or the environment (impact materiality). We establish, assess, monitor and review these topics using a double materiality assessment.

The double materiality assessment is conducted under the leadership of the Group ESG and Compliance Manager, supported by the ESG Steering Committee, an interdisciplinary group of Eficode employees from relevant areas of operations, and additional experts from the most important stakeholder groups. The ESG Steering Committee is composed of the Group Chief Executive Officer, Group Chief Financial Officer, Group Head of People and Culture, Group Head of Strategy and Corporate Development and Group General Counsel. The assessment is reviewed annually as a minimum, and the identified material topics are approved by the Management Team, Audit Committee and Eficode's Board of Directors.

Group senior management members are assigned material topics to manage within their respective areas of expertise. They are responsible for implementing the relevant sustainability



measures for each topic. The ESG Steering Committee will address and follow up on material topics and initiate processes aimed at developing policies, actions, metrics and targets within the boundaries of the material topics. The ESG Steering Committee reports to the Board Audit Committee. The members of the ESG Steering Committee represent the whole value chain within Eficode and have relevant background and experience within the sustainability aspects of the company. The Board of Directors evaluates the objectives, strategies and risk profiles at least annually. Specific targets and metrics linked to the material topics are evaluated by the ESG Steering Committee. New targets and metrics are approved by the Audit Committee or, where necessary, the Board of Directors.

6. Our statement on Environmental Stewardship

Our focus

Our responsibility program is committed to environmentally sustainable initiatives, empowering Eficode People to adopt responsible operating practices in our local offices, within our global operations and in the design and delivery of services to our clients. Our current focus, based on the materiality of environmental topics for Eficode, is climate change mitigation and responsible use of energy.

Our Actions

- Comply with or exceed all applicable global or local environmental regulations.
- Calculate and publicly report on scope 1, 2, and material scope 3 emissions across the Eficode Group, in alignment with industry recognised reporting standards.
- Public commitment to set science based targets via the Science Based Targets Initiative, with development and submission of targets during the fiscal year 25/26.
- Implementation of our carbon reduction strategy which covers reduction initiatives and targets across buildings and facilities, internal operations, procurement, travel and services.
- Implement and maintain efficient resource and waste management practices that promote reduction, re-use and recycling of waste and local circular economy, responsible disposal of hardware and peripherals.
- Extend, as much as feasible, the life cycle of all our IT hardware in offices and data centers.
- Implementation of internal education and awareness programs such as carbon literacy workshops and communication of our environmental policies via our e-learning platform.



- Conduct mandatory training and knowledge testing for all Eficode People on environmental topics.
- Implementation of our Supplier Code of Conduct, working with our suppliers to reduce their environmental impact, and to gather accurate environmental data.
- Further development and strengthening of our environmental governance.
- Encouraging our clients to reduce their impact on the environment by designing services that reduce their carbon footprint, such as moving to shared ecosystems, removing unnecessary services and scaling down staging environments during off-hours.

7. Our statement on Social Responsibility

Our focus

Our responsibility program is committed to developing a culture built on the belief that all people should be treated with dignity and respect. Diversity, equity and inclusion are inherently something we strive to foster, within our own walls and the wider community. Our current focus, based on the materiality of social topics for Eficode, is working conditions, equal treatment and opportunities for all, and other worker related rights within our workforce as well as the privacy and security of our end users.

Our Actions

- Preserve and promote the protection of human rights and welfare within our own operations, as well as those of our supply chain.
- Investing in initiatives and tools that support our Eficode Peoples' physical and mental health and well-being needs.
- Providing and continuing to develop an equitable performance management and career development framework.
- Conduct mandatory training to increase Eficode Peoples' cultural awareness, knowledge, and communication to support a global community.
- Establish and maintain recruitment practices that enable and support a diverse workforce with different backgrounds and perspectives.
- Support and encourage the creation of affinity groups and safe spaces that help us recognise our similarities and celebrate our differences. Give visibility, locally and globally, to initiatives supporting DEI issues.
- Champion equitable inclusion and increase internal mobility by improving access to training, mentoring, and other development programs that progress and support continued personal and professional development for a diverse workforce.



- Providing our clients with a partner they can trust to protect the security and privacy of their information through the continuous improvement of our information security management system in accordance with ISO 27001 and ISO 27701.
- Implementation of our Supplier Code of Conduct, working with our suppliers to improve their social impact.

8. Our statement on Governance, Ethics and Compliance

Our focus

Our responsibility program is committed to promoting strong oversight, transparency and risk management at all levels of our organisation, ensuring the resilience and long-term preservation of value for our business. As a leader in digital services, our responsibility extends to how we deploy digital strategies and protect data, through using the highest standards of security. Our current focus, based on the materiality of governance topics for Eficode, is corporate culture, corruption and bribery and management of our supplier relationships.

Our Actions

- Maintain strong corporate governance practices through exemplary board stewardship, management accountability, and proactive risk management.
- Maintain high ethical standards through a strong Code of Conduct, mandatory business ethics and anti-bribery and corruption training and executive leadership that promotes a culture of integrity.
- Understand and mitigate against our risk exposure and build the resilience of our business to such risks e.g. bribery and corruption.
- Maintain correct, accurate and legible records of our financial activities.
- Cultivate strong stakeholder relationships through transparency, open communications, and responding to stakeholder input.
- Behave in line with Eficode's values when working with clients and other stakeholders.
- Support our stakeholders as ethical issues arise, ensuring an open-door policy for resolving such issues with integrity.
- Build closer relationships with our suppliers through implementation of our Supplier Code of Conduct, supplier due diligence, and procurement processes.
- Ensure that activities within our organisation operate in a way that is aligned with laws and regulations.
- Ensure that activities within our organisation operate in a way that is aligned with the voluntary standards that we subscribe to.



ESG Governance

Several internal groups provide guidance and set our ESG objectives:

- The Board oversees the formulation of our long-term strategic, financial, and organisational goals.
- Eficode's ESG Steering Committee approves the ESG initiatives and strategies and establishes communication to the Board. Our ESG Steering Committee is made up of executive- and manager-level representatives from our strategic business units and corporate functions.
- The Group ESG and Compliance Manager leads the advancement of our strategy and action plans in collaboration with local business units.
- Working groups, made up of local participants from business units, and internal stakeholders, meet regularly to develop and implement our ESG priorities.

9. Disclosure

Accountability and transparency are integral to the foundation on which we build trust with our clients, Eficode People, communities, and other stakeholders. We continue to take steps to strengthen our reporting approach through ongoing stakeholder engagement and alignment to global non-financial reporting standards.

Eficode continues to integrate ESG targets and data into our strategic planning process. Currently Eficode reports on ESG strategy as a Group via a number of public platforms including environmental metrics via the Carbon Disclosure Project and ESG metrics via rating provider EcoVadis. We also continue to improve stakeholder access to information via the corporate responsibility section of the website.