



Annual report 2025



Driving the safest, smoothest and most environmentally friendly traffic system in the world

We provide and develop traffic control and management services for all modes of transport.

We help people and goods arrive safely and smoothly, while also paying attention to the environment.

Intelligent traffic management services, digital services for companies and consumers and up-to-date traffic information accelerate Finland’s development into a pioneer in sustainable transport and logistics.

We want to offer an excellent and attractive workplace for top experts. We employ 1,193 professionals.

Parent company

Traffic Management Company Fintraffic Ltd provides traffic control services across all modes of transport and offers digital services and open data for various stakeholders.

Subsidiaries

Fintraffic Air Navigation Services Ltd is responsible for air navigation services.

Fintraffic Vessel Traffic Services Ltd is responsible for vessel traffic services.

Fintraffic Railway Ltd is responsible for rail traffic control and management.

Fintraffic Road Ltd is responsible for road traffic control and management.

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Annual Report 2025

Strategy, key events of 2025, and a review of responsibility and sustainability.



Governance and Remuneration Report 2025

Information about the company’s governance and steering system, and the remuneration paid to the CEO and members of the Board of Directors.

[Read the report here.](#)



Report of the Board of Directors and Financial Statements 2025

A description of the company’s operations in 2025 and a summary of its financial results and financial position.

[Read the report here.](#)



Year 2025



Your partner in traffic

A landing aeroplane, a train arriving on schedule, a driver alerted of an obstacle on the road ahead, a cargo ship sailing down a fairway – each is supported by a wealth of expertise, cooperation and care in the background. Our task is to ensure that traffic in Finland is safe, smooth and sustainable – around the clock, every day.

To carry out this task, we produce world-class traffic control services and up-to-date data. By using smart, data-driven approaches, we can prevent accidents, reduce travel times and facilitate transitions between modes of transport. At the same time, we both reduce transport-related emissions and provide financial savings for households, companies, and public stakeholders.

Traffic data forms the foundation for our daily work. We monitor traffic continuously and ensure that all stakeholders in the sector can make efficient use of this real-time information.

In the future, the transport of people and goods in Finland will be safer, smoother and more environmentally friendly than ever. Traffic will be smart and services easily accessible, and the entire transport system will function as a unified system. The data produced by traffic control will help predict future events. This will prevent accidents, save time and reduce emissions.

This kind of future is possible when an increasingly comprehensive digital layer is built upon the physical infrastructure – a digital layer that provides as accurate insights as possible for the entire transport system and all services. Within the layer, individual stakeholders can easily share information and thus build services that are fully compatible with each other.

This would allow us to create a unique national network of data-driven transport operators. This is an opportunity to create something unique and give our country an exceptional advantage. Let us make Finland a model country in smart transport and logistics. Let us create work and services. Let us improve our competitiveness.

We Finns need Fintraffic expertise, every second of the day, throughout the year.

Fintraffic is a part of everyday life in Finland – rarely seen, but always present. We are building a future where traffic is safe and smooth – everywhere.

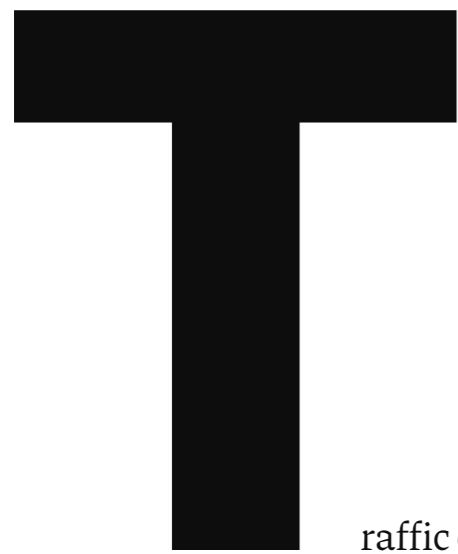


CEO'S REVIEW

Responding to unpredictability with safety and seamlessness

2025 brought a number of transport-related challenges, including unpredictable geopolitical turmoil, quickly shifting weather conditions and numerous disruptions. These circumstances emphasise the key task of Fintraffic – ensuring safe, smooth and reliable flow of traffic across all modes of transport. Our role as the hub for traffic data was also strengthened.





traffic control in all its forms

remained reliable and the quality of services was high throughout the year:

- Air Navigation Services were provided for over 240,000 flights, with an overall 2025 score of 4.0 (scale 1–5) reported in our customer satisfaction survey
- On the rail sector, we were responsible for the safe and smooth passage of more than 580,000 trains. The punctuality of trains improved by 5.1 percentage points from the previous year, reaching nearly 93 per cent.

- For merchant shipping, we proactively intervened in the passage of vessels approximately 18,000 times, ensuring the safe and smooth passage of both cargo and passenger ships and tankers. In addition, we intervened in eight cases with potential for grounding during the year.
- In road traffic, we issued 11,000 traffic bulletins warning drivers of various disruptions and incidents.

The production of Fintraffic services became more efficient than before. Our goal is to achieve EUR 30 million in efficiency improvements by the end of 2028. We expect to meet this target ahead of schedule.

We continued to implement our strategy in three programmes:

Productised digital ecosystem services

Fintraffic strengthened its position as the key traffic data hub. Our digital services evolved as planned, supporting both the public and companies in the utilisation of real-time traffic data and in the management of exceptions. The use of digital services increased by nearly 50 per cent. The Act on Digital Information Services in the Transport System entered into force at the beginning of 2026, assigning us new traffic data-related obligations for which preparation were made in 2025.

Traffic control development

In **Rail Traffic Management**, we made a significant investment in the new rail traffic control and management system. The new system will improve the smoothness and safety of rail traffic in Finland. The renewal of train control jointly with our partners as part of the Digirail project proceeded as planned. In addition, we significantly improved the continuity of operations and preparedness on multiple levels. We also introduced new premises in the Helsinki Metropolitan Area.

For **Air Navigation Services**, we developed air traffic control services in a number of long-term projects: signing the TopSky ATCOne international joint procurement agreement was a milestone for the reform of the main air navigation system. In addition, the tendering process for the remote air traffic control project proceeded as planned. Planning work for closer cooperation with the Estonian Air Navigation Service provider continued, as did the reform of Finnish airspace.

Traffic control in all its forms remained reliable and the quality of services was high throughout the year.



In **Road Traffic Management**, the completion of a multi-year project marks the official renewal of the Helsinki Metropolitan Area Traffic Management Centre. Meanwhile, the reliability of Road Traffic Centres was further improved by improving their cross-site emergency preparedness. Life cycle reforms were extensively implemented for roadside traffic control equipment and systems.

Vessel Traffic Services saw improvements to the safety of vessel traffic, mapping the needs for additional safety zones along the Finnish coast for special transports, such as LNG and LPG tankers. These safety zones ensure the safe passage of special transports. Additionally, we developed our situational picture service that supports the control of merchant shipping in the event of disruptions in satellite positioning.

Uniform operating practices

We prepared for the CER Directive, which promotes the resilience of critical societal functions, by developing preparedness and continuity management and improving overall risk management.

Workplace satisfaction among Fintraffic staff as well as their well-being and occupational health have developed positively, with several metrics rated as excellent.

Public awareness of Fintraffic increased, as did the amount of positive feedback from our stakeholders.

Future guidelines

We updated our strategy up to 2030. Our primary focus will remain on the provision of traffic management services, statutory digital services and open data. Our objective is to increase our societal impact, especially by ensuring safe and smooth traffic flows, providing reliable services and supporting our partners on their path to success.

We strive to ensure that Fintraffic is beneficial to Finland as a socially significant, reliable and resilient transport sector operator. We are developing traffic control for the particular needs of fairway owners, end users and maintenance experts as well as defence and security authorities, driving the sector forward with our data. Our aim is to make Fintraffic the primary compiler and provider of Finnish traffic data. We are building the digital twin for traffic piece by piece with our partners.

We will continue improving our corporate culture, management and staff welfare. Our HR management prioritises the development of skills and capabilities, moderation of workloads, diversity and capacity for reformation. We seek to attract and engage skilled

employees to secure our long-term development and the capacity to respond to changing needs. Responsibility is a key part of our strategy, development projects and everyday work.

2025 demonstrated that Fintraffic is able to ensure safe and smooth traffic despite geopolitical challenges. I would like to extend my warmest thanks to our staff, our customers, the authorities, our partners and all of our stakeholders for their trust, active cooperation and joint commitment to safe and smooth traffic.

Pia Julin

CEO



Key indicators for 2025

Turnover (EUR 253.6 million)

EUR **267.7** million

Profit before taxes (EUR 15.1 million)

EUR **18.1** million

Personnel, average (1,198)

1,193

Supervisory work index (4.3)

4.3

Number of serious accidents resulting from Fintraffic operations (0)

0

Prevented groundings at sea (14)

8

Value creation for the transport data economy (2022: EUR 40 million)

EUR **54** million

Visits to digital services (7.8 million)

11 million

Emissions savings in road and air transport (28,700 t)

97,200 t

Business areas in brief



Air Navigation Services
Revenue MEUR 96,9 (88,7)
Personnel 436 (425)

Our services

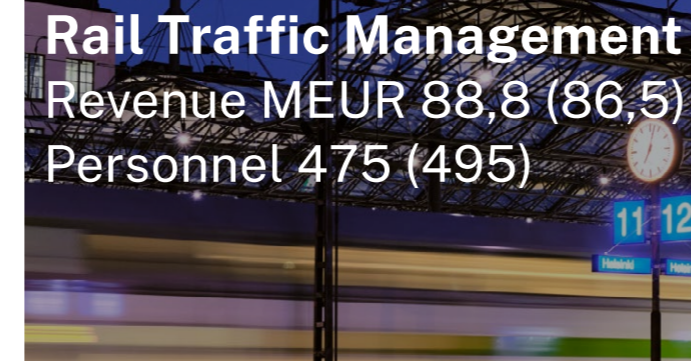
- managing Finland's airspace and providing air route services and air navigation services at 22 airports in Finland
- the design and maintenance of air navigation infrastructure and systems in Finland, and technical maintenance services at five airports in Sweden
- special assignments related to air rescue and area surveillance
- training and consulting services
- services for drone operators



Vessel Traffic Services
Revenue MEUR 23,2 (20,8)
Personnel 110 (106)

Our services

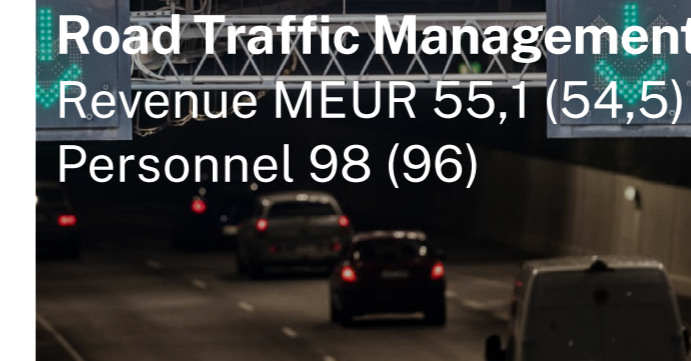
- vessel traffic services
- safety radio operations
- monitoring international waters
- radio navigation services
- maritime situational awareness services for the authorities
- digital maritime traffic services for vessels and stakeholders
- expert and consulting services
- maritime traffic notification services for vessels, vessel representatives and the authorities
- services and development projects that improve the environmental efficiency of maritime traffic



Rail Traffic Management
Revenue MEUR 88,8 (86,5)
Personnel 475 (495)

Our services

- rail traffic management
- traffic planning to coordinate trackwork and rail traffic
- capacity management
- operating centre
- passenger information services for train travel
- operations centre, including the Rail Traffic Management Centre
- security control
- Digirail expert services



Road Traffic Management
Revenue MEUR 55,1 (54,5)
Personnel 98 (96)

Our services

- road traffic control and management services at Traffic Management Centres
- traffic control systems for tunnels, sections of open road, and border crossings
- control and operating systems for traffic lights, and automatic infrastructure for speed limit control
- road weather equipment, systems and analytics
- traffic measurement and analytics



Digital ecosystem services
Revenue MEUR 4,0 (3,4)
Personnel 8 (7)

Our services

- promoting cooperation with traffic sector operators: Enabling the operation of the traffic data ecosystem and guiding coordination
- developing digital transport infrastructure: technical data platform, data and basic digital business services
- coordination of the traffic data export cluster: market analysis, finding relevant actors, focussed sales paths
- compiling a digital rulebook: templates, standard agreements, cooperation and data transfer standards
- continuous development of existing services, including Fintraffic App, Digitraffic, Traffic Situation, National Journey Planner, Feedback Channel, Digitransit, FINAP



2025 achievements

RELIABILITY

Our traffic control services remained reliable despite the circumstances in our operating environment. We continuously improved the safety, smoothness and environmental friendliness of traffic with our services and supported the work of the authorities.

CUSTOMERS

Overall customer satisfaction with Fintraffic services is high.

SUSTAINABILITY

We made determined progress in advancing our responsibility objectives, ensuring the implementation of our responsibility programme. We committed to introducing emission reduction objectives based on scientific data.

TRAFFIC CONTROL

- We launched Project Atlas for developing a new rail traffic control and management system. The objective of Project Atlas is to improve the smoothness and safety of rail traffic in Finland, improve the quality of traffic management and increase the adoption of automation. Combined with the Digirail project, this reform will drive Finland to a pioneering position in the development of rail transport in Europe.
- We expanded our safety zones in merchant shipping fairways, ensuring the passage of LNG tankers and other special transports.
- The rail and road traffic control centres in the Helsinki Metropolitan Area were renewed, having reached the end of their lifecycle. The new facilities will ensure reliable and efficient services in the future.
- We launched the Fintraffic Sky service for compiling essential aviation data into a free-to-use live service that provides aviators with accessible situational awareness and flight planning.

- We publicly released road safety and live traffic data through our national contact point in compliance with EU regulations. This release underlines our commitment to the principles of open data and improves the preconditions for safe and smooth traffic flow throughout the road network.

DIGITAL SERVICES

The popularity of our digital services further increased, with the number of visits up by almost 50 per cent year-on-year. The Fintraffic App was downloaded by 68,000 new users. The Fintraffic App reached 128,000 downloads by the end of the year.

The operations of the export cluster under our coordination generated EUR 13 million worth of sales for our partners, and an additional EUR 20–30 million worth of leads.

EFFICIENCY

The efficiency of our service production continued to improve, keeping us well on track towards achieving our efficiency target.

COOPERATION

New members joined our data ecosystem cooperation for promoting the digitalisation of transport. 237 organisations were involved by the end of the year. The data ecosystem supports the entire transport sector in leveraging data.

WORKING AT FINTRAFFIC

- Personnel satisfaction remained high. Further improvement was reported in work atmosphere, rated at 4.3/1-5, as well as supervisory work, rated at 4.3. The well-being index reached a record high as well.
- We improved our target-oriented company culture and culture handbook together in cooperation with our staff across Finland.



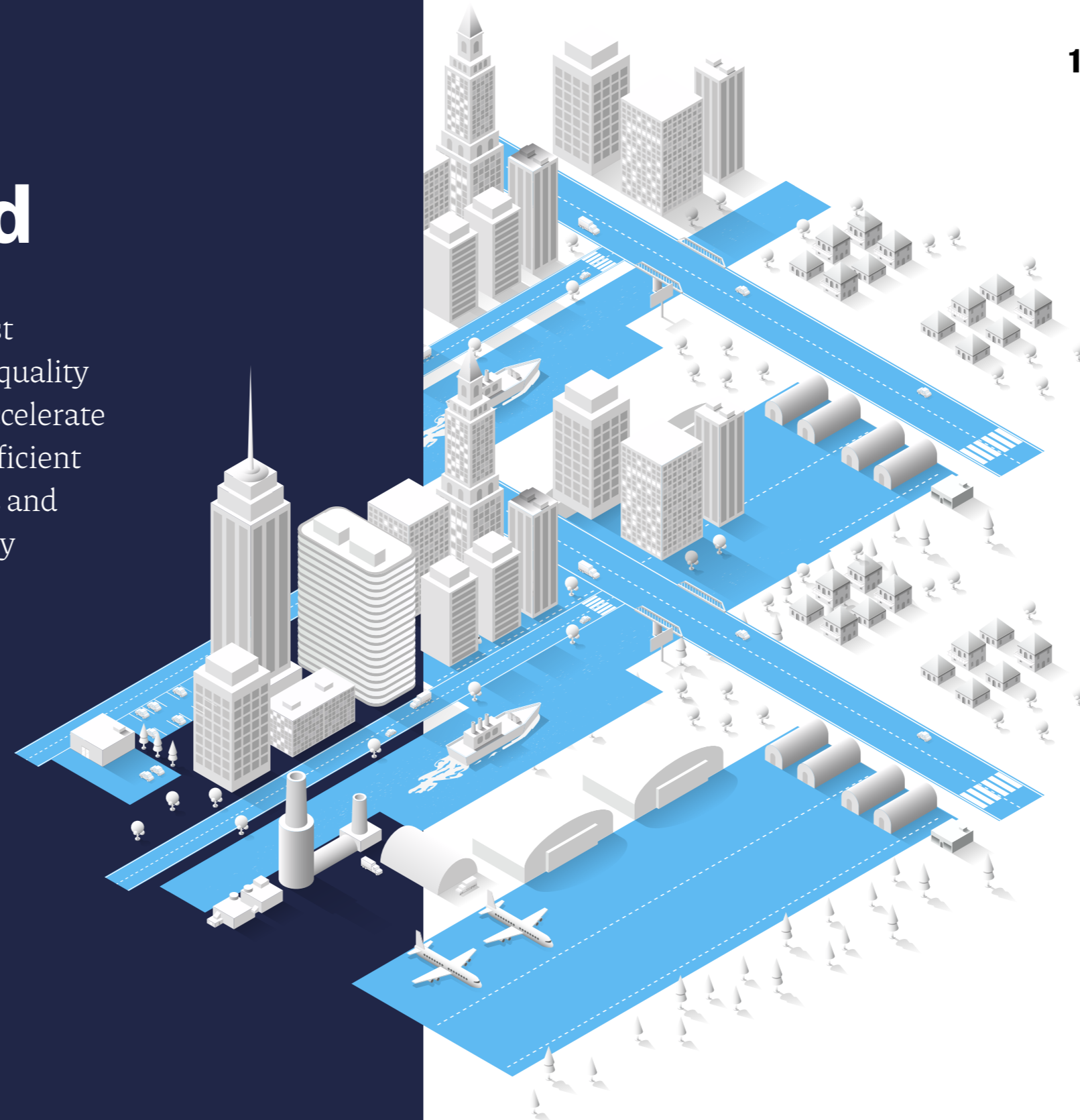
Strategy and societal role



STRATEGY 2024–2028

Driving the safest, smoothest and most environmentally friendly traffic system in the world

Our goal is for Finland to have the world's safest, smoothest and most environmentally friendly traffic system. Responsibly produced high-quality services and close cooperation with transport sector operators will accelerate Finland's progress towards becoming a pioneer in sustainable and efficient traffic. This is important with a view to reducing transport emissions and risks and minimising transport costs. The benefits we bring to society are at the heart of our strategy.



Our strategy is based on Fintraffic's ownership strategy which was approved on 16 October 2019. It defines Fintraffic's duties as follows:

1

To provide and develop the traffic control and management services required by **society, commerce and the authorities.**

2

To provide and develop traffic control and management services to meet the needs of **defence and security authorities.**

3

To collect and utilise data related to traffic management and provide it equally to other operators; and to create opportunities for new business based on automation and the broad use of both data and new business models.



In 2025, we implemented our strategy in three programmes:



Traffic control development

We are renewing our traffic control tools and operating models. We leverage cutting-edge technology and increase the use of automated solutions. We manage device and system lifecycles. We continue improving our preparedness and the efficiency of our operations. We enhance our data base and our ability to leverage it to achieve continual improvements in traffic safety.



Productised digital ecosystem services

We develop and offer productised digital services for application developers, companies and end users. We promote cooperation in the sector in the traffic data ecosystem. Thanks to cooperation and high-quality platform services, we are gradually building a digital twin of traffic as well as improved travel and transport chains. We want to be the cornerstone in both statutory and commercial transport data in Finland.



Uniform operating practices

Our operations are guided by a strong, uniform corporate culture and shared values. We identify and ensure the competences and capabilities required by the strategy. Our management system is clear and we work effectively together. Leadership and supervisory work are goal-oriented, appreciative, inclusive and pay attention to individuals. Risk management and preparedness are a key part of our activities.

What progress did we make in implementing our strategy in 2025?

1. Traffic management services operated reliably and to a high standard in all modes of transport throughout the year. Our work in promoting traffic safety yielded results.
2. We continued to develop traffic control methods and systems. We prepared for the CER Directive, which promotes the resilience of critical societal functions, by developing preparedness and continuity management and improving overall risk management.
3. We finished commissioning our new premises in the Helsinki Metropolitan Area.
4. There are 237 organisations involved in the data ecosystem work promoting traffic digitalisation.
5. Fintraffic's role as the traffic data hub was bolstered. The Act on Digital Information Services in the Transport System entered into force on 1 January 2026. Fintraffic proceeded as planned in developing its digital services for companies, authorities, application developers and consumers, and the use of the services reached a new record (+50%).
6. The production of Fintraffic services became more efficient than before. We aim to enhance the efficiency of the provision of services to the Finnish Transport Infrastructure Agency by EUR 30 million between 2023 and 2028. We expect to meet this target ahead of schedule.
7. We continued to develop our operating methods. We promoted the implementation of responsible practices and impact reporting. We committed to introducing emission reduction objectives based on scientific data.
8. Fintraffic staff reported improved work satisfaction. The number of sick leaves decreased as well; despite the great number of shift workers, the sick leaves rate was very low (2.3%).
9. Public awareness of our joint Fintraffic brand continued to increase.



The efficiency of Fintraffic's service production continued to improve at a rapid pace.

Our operating environment is changing, increasing demands and expectations

The growing geopolitical tensions will require better preparedness and improved security of supply. The increasing frequency of extreme weather phenomena, combined with a backlog of infrastructure repairs, will put increased pressure on traffic control operations and recovery from exceptional situations.

Budget cuts and the unstable air transport market puts pressure for Fintraffic's further evolution and the search for growth, new customers and business models.

Influencing traffic and data economy legislation plays a key role in the implementation our strategy. Regulation increases certain investment needs.

The increasing regulation and reporting obligations must be leveraged in the pursuit of business benefits.

There is a societal need for world-class traffic control, high-quality data and platform services, increased digitalisation and use of artificial intelligence, as these can help improve the sustainability of traffic and associated services, the functioning of the traffic system and the efficiency of logistic chains.

Passenger cars will remain a popular form of transport, maintaining demand for road transport services, although there is limited room for market growth in the transport services sector. The market for transport services is growing, especially interna-

tionally, and Fintraffic can help companies operating in this sector to internationalise their operations.

Municipal traffic data will be integrated into the national situational picture, further strengthening Fintraffic's position as a central traffic data centre. All components of the transport system are producing more data than ever before, and at an ever-increasing rate. This change will require improved data transfer capabilities within the transport system. Fintraffic has a key role in driving this improvement.

Utilisation of technology-driven opportunities (e.g. artificial intelligence) unlocks new opportunities but requires rapid learning, reform and scaling as well as the capacity to leverage data more effectively. The importance of data management will be accentuated.

Competition for high-demand workforce will grow in the coming years, which means that attracting new employees and retaining current employees is increasingly important.

Fintraffic will ensure its ability to engage and retain a skilled, increasingly diverse workforce by developing its corporate culture and management. The desire to develop our shared culture has grown within the organisation. Work ability management and diversity will become increasingly important. Skill development and the ability to reform should be secured.

Updated strategy for 2026–2030

We updated our strategy for 2026–2030 in 2025 based on changes in the operating environment and the measures taken during the previous strategy period. We specified our strategic programmes as part of the strategy update. We will continue to reform traffic control and data-based development of the traffic system. In addition to these, we will secure futureproofing internal capabilities.



VISION

THE SAFEST, SMOOTHEST AND MOST ENVIRONMENTALLY-FRIENDLY TRAFFIC IN THE WORLD

SOCIAL IMPACT, CUSTOMER AND WORKPLACE SATISFACTION

- Safe, smooth & environmentally friendly traffic
- National preparedness & reliable traffic services
- Cost-effective traffic
- Seamless sector-wide cooperation
- Growing traffic data economy, market & export

JOINT EFFORTS

STRATEGIC INITIATIVES

- Development of traffic management
- Data-driven development of the traffic system
- Future enablers

MISSION

THE BEST TRAFFIC MANAGEMENT IN THE WORLD AND SMART TRAFFIC SERVICES. TOGETHER.



VALUES

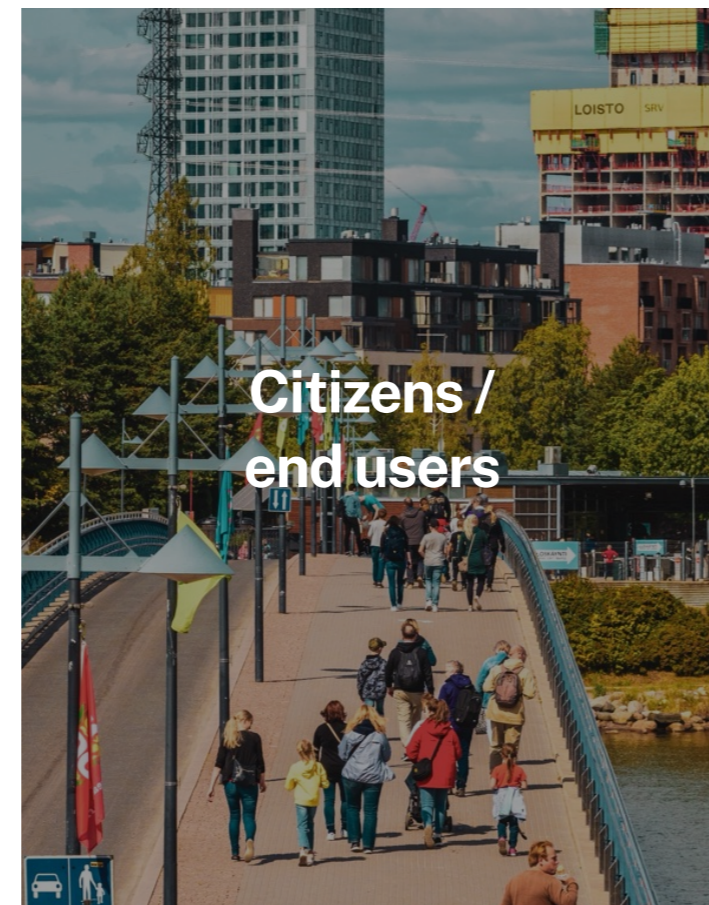
WE SAFEGUARD, CARE, AND LEAD THE WAY. TOGETHER.



Fintraffic customer groups



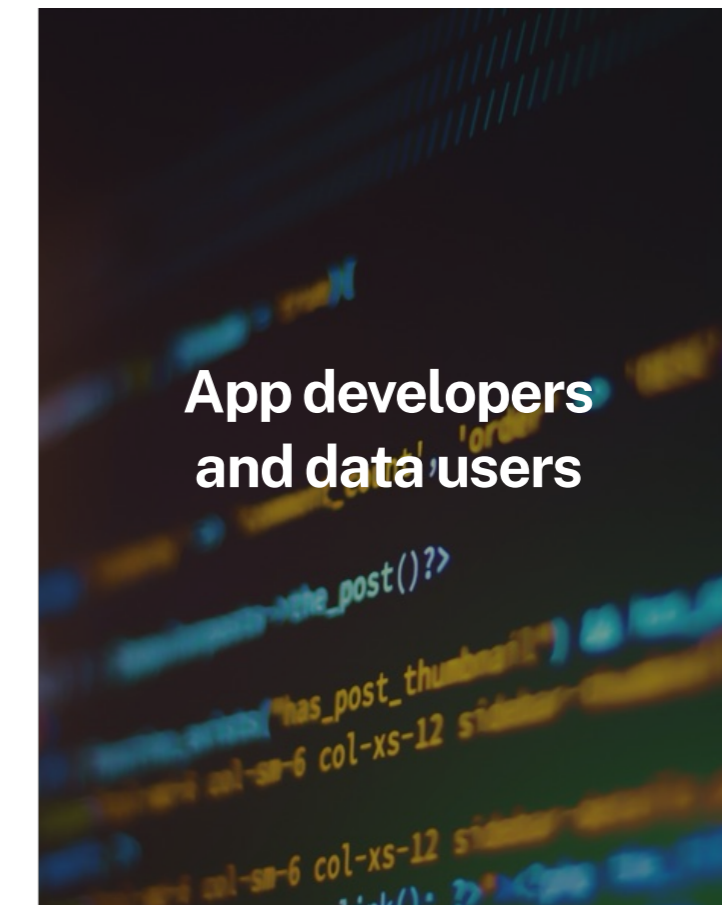
Our solutions for traffic control and digital services for the authorities support their operational capacity as well as the competitiveness and security of supply of Finland. A real-time situational picture and other support help the authorities in performing their tasks.



Our services promote safer and smoother travel and transport chains, facilitate travel planning, promote sustainable modes of transport and reduce transport costs. We always strive to improve customer satisfaction.



Efficient logistics, service development and new business are important for companies. These are supported by safe, state-of-the-art traffic control services, open data and digital services as well as ecosystem cooperation.



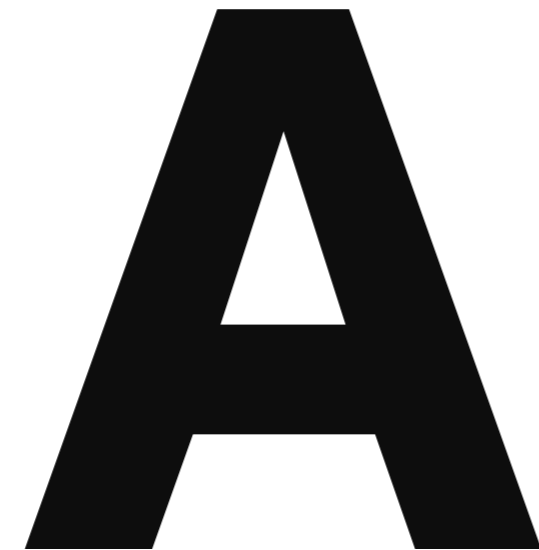
Reliable and appropriate platform services and interfaces as well as high-quality data are essential for the development of traffic system services.



SUSTAINABILITY

Sustainability is part of Fintraffic's business and daily life

Fintraffic's task is to produce reliable and high-quality traffic management services on land, at sea and in the air. In addition, it is tasked with promoting a sustainable transport system through its services, open data and close partner collaboration.



As a special assignment company of the Finnish government, we play an important role in solving sustainability issues related to transport, such as reducing emissions and improving traffic safety. We aim to meet the expectations placed on us; this is why we have integrated sustainability into our strategy, business model and remuneration scheme. The environmental and social impacts and impacts related to good governance are at the core of our strategy.

Fintraffic contributes to achieving the 2035 Finnish carbon-neutrality target and the limitation of global warming to 1.5°C as per the Paris Agreement on climate change, setting emission reduction targets based on scientific data.

We comply with the EU's sustainability regulation and the guidelines set for state-owned companies by the owner. The UN Global Compact principles guide our operations. We apply the Finnish Corporate Governance Code of the Securities Markets Association and the OECD Principles of Corporate Governance. We observe key human rights declarations, such as the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

We are committed to promoting the sustainable development goals of the United Nations (Sustainable Development Goals, Agenda 2030). Through our operations, we aim to both promote the achievement of the goals and reduce the negative impacts against them.

Operating in the transport sector makes ensuring safety vital for Fintraffic: our core task is to promote overall traffic safety. The unstable geopolitical situation has increased the need for development measures related to data and cybersecurity risks.

While denial-of-service attacks have been targeted against Fintraffic, their impact has been very limited thanks to data security development.

Sustainability is integrated into Fintraffic's strategy and business operations

Every year, we update the material impacts, risks and opportunities of our business operations. We manage risks as part of our risk management system. We actively develop our sustainability competence at different levels of the organisation.

Towards the end of 2023, Fintraffic completed its first materiality analysis process of identifying and assessing material sustainability impacts, risks and opportunities in accordance with the double materiality criteria as required by the EU's Corporate Sustainability Reporting Directive (CSRD).

The double materiality is assessed annually by the Responsibility Team, the Group Executive Board and the Audit Committee. After validation, the Board approves the final results of the double materiality analysis.

The materiality analysis process and the essential responsibility topics are described in more detail in the responsibility report.



Responsibility programme

Our responsibilities are divided into environmental responsibility (E), social responsibility (S) and good governance (G). Fintraffic's sustainability programme defines the objectives, measures and indicators of the key areas of sustainability. The programme also describes the key roles in the management of sustainability and stakeholders as well as the expectations of the key stakeholders and management methods.

Responsibility objectives and measures Environmental responsibility (E)

Fintraffic drives carbon neutrality in Finland and limiting global warming to 1.5°C in accordance with the Paris Agreement. Our environmental responsibility is based on the principles of sustainable development and scientifically backed climate targets across the value chain.

Our key climate objectives:

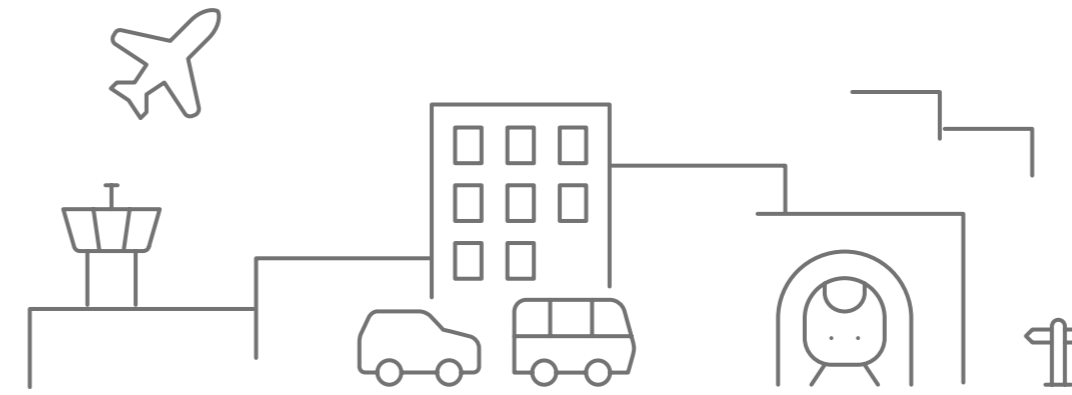
- We will reduce the emissions from our own operations by 63% by 2035 (from 2024 levels).
- We will reduce our emissions from procurement by 63% by 2035.
- Our goal is to achieve net-zero emissions across the value chain by 2050, i.e. achieving emission reductions of at least 90%.

Responsibility* is our cornerstone



Responsibility for the environment

Carbon neutrality in our own activities and procurements



Responsibility for people and communities

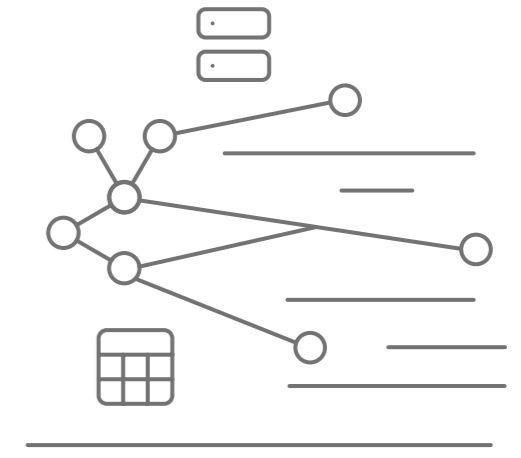
Healthy, equal and skilled personnel

A safe workplace

Promoting safe, smooth and environmentally friendly traffic

Reliable and efficient services

Smooth cooperation between transport sector operators, a growing data economy and developing services



Responsibility for good governance

Efficient financial management

Ethical business practices: anti-corruption and anti-bribery measures

Proper data protection and cybersecurity

Reliable management system

Responsible use of AI



UN sustainable development goals essential for our activities and stakeholders.

* Fintraffic's responsibility programme defines our responsibility objectives, measures and indicators.



Social responsibility (S)

Our goal is to improve the well-being and occupational safety of personnel. Various measures improve the health and reduce the workload of our employees, as demonstrated by the positive developments. The results of the annual personnel satisfaction survey by an external service provider have been excellent and with consistent improvements year-on-year. The ratings for supervisory work, the realisation of company values in everyday work and the utilisation of the results are have been particularly high.

We made numerous improvements to our corporate culture in 2025, organising 27 cultural café events across Finland and completing a cultural handbook on Fintraffic corporate culture in cooperation with our entire personnel. Fintraffic will join the Family Federation of Finland's Family-Friendly Workplace Program that promotes equality. In addition, we were a pilot company in the EU-funded Finnish Institute of Occupational Health Care4Career Project that promotes gender equality, work-family life balance and family-friendly practices in working life.

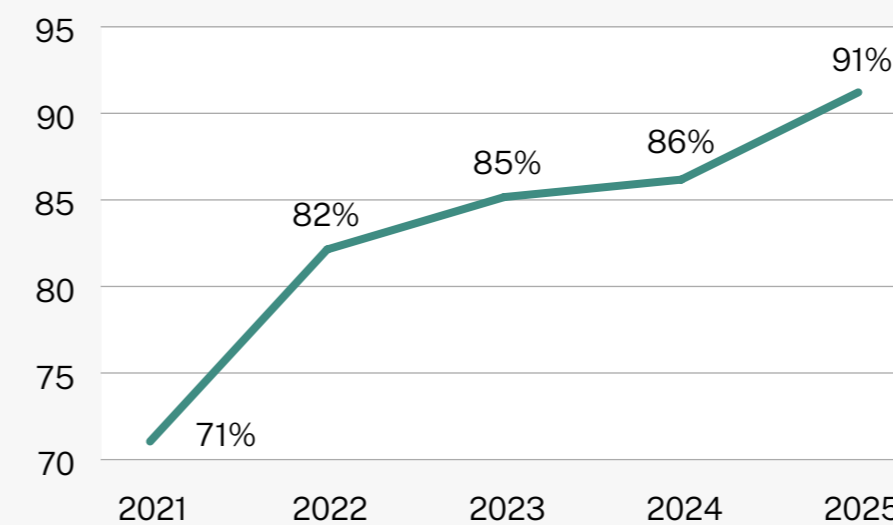
Responsibility for people – Focus on staff well-being and health

The well-being and health of Fintraffic staff have shown positive development year-on-year over a long, five-year term, and significantly exceeded the baseline. The response rate of the personnel satisfaction survey has increased annually, reaching as high as 91 per cent in 2025. Our staff give rate the use of the survey results highly according to our survey partner Balentori, which may contribute to the high response rate. In 2025, the use of the survey results

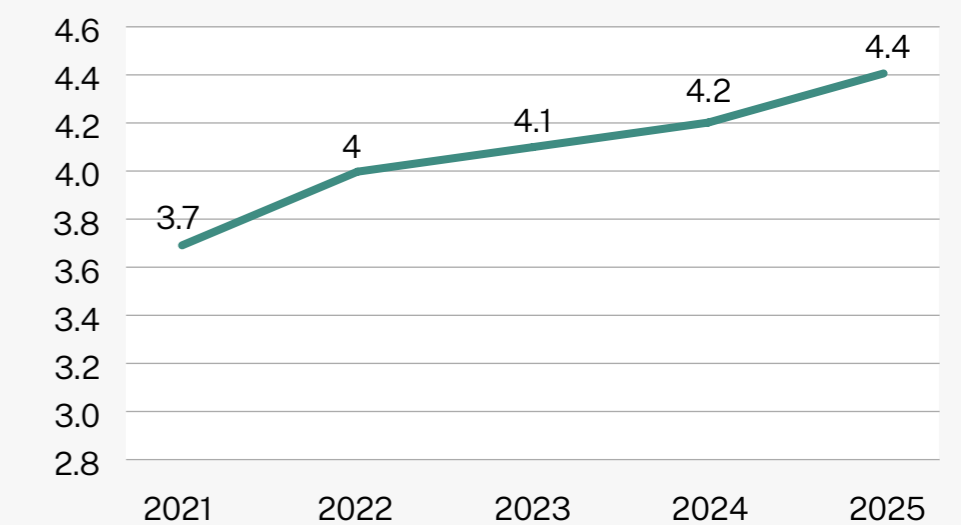
was rated at 4.4 on a scale of 1–5, compared to 3.7 five years earlier, with a response rate of 71%.

Supervisory work was particularly praised. The employees rated supervisor work at 4.3 in 2025 (on a scale of 1–5, where 5 is the highest). In the previous year, supervisory work received a grade of 4.2, compared to 3.8 in 2021. During the same five-year period, the work atmosphere score has improved from 3.7 to 4.2. Belief in a bright future for the company has also improved, achieving a score of 3.9, up from 3.3.

Response rate



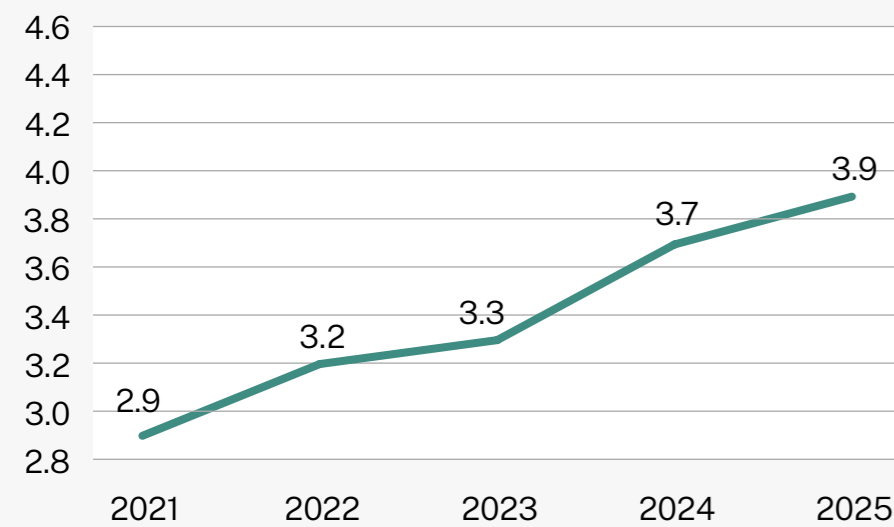
Leveraging the personnel survey, score (1–5)



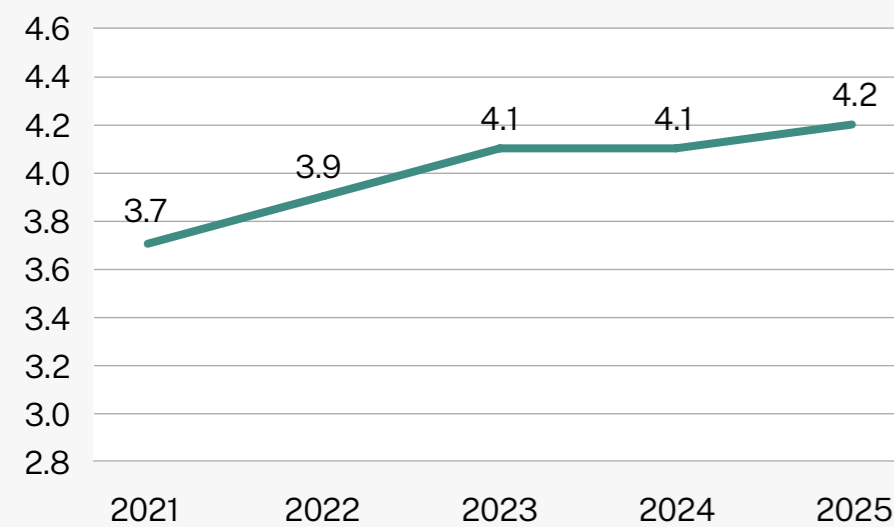


Cooperation between our business operations has also improved measurably during the five-year review period (2.9 → 3.9). We have actively improved our corporate culture and supported the cross-organisational socialization of our personnel. To give an example, we have organised an internal “student

Cooperation between business operations

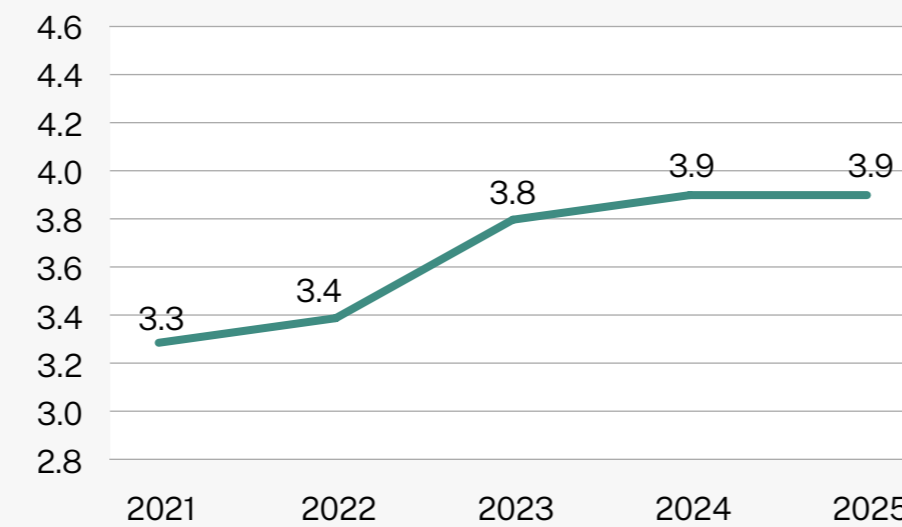


Work atmosphere

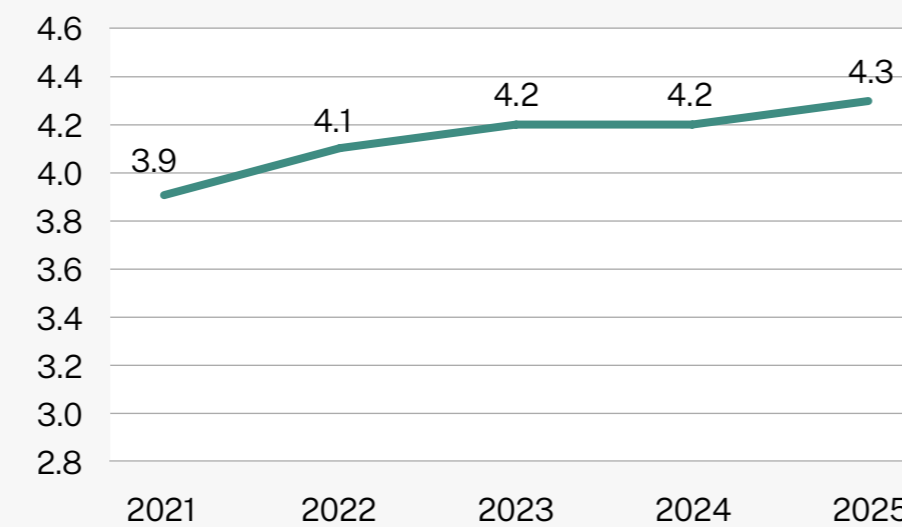


exchange programme” where staff members get to experience the day of another unit. Experiences of the programme have been reported as excellent. At the end of 2025 we completed our cultural handbook developed together with our staff, their representatives and management. The cultural handbook devel-

Future trend



Supervisor work



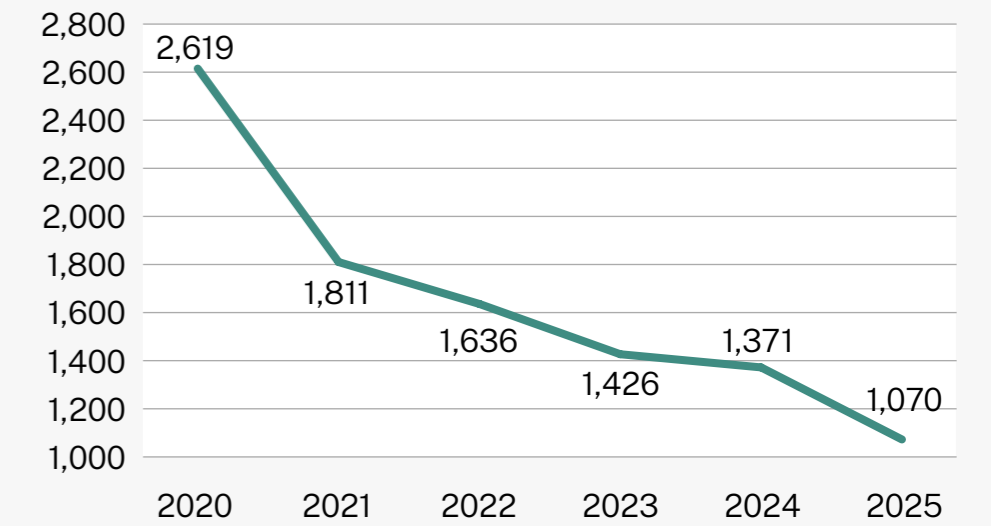
opment project included 27 cultural café events at Fintraffic offices across Finland and surveys available to everyone on the intranet.

Terveystalo conducts an annual well-being survey for our personnel. In 2025, the wellbeing index was 93.7 per cent, compared to 93.3 per cent the previous year. Five years earlier, this index stood at 86.7 per cent; in five years, staff well-being has increased by up to seven percentage points. The index describes the share of people who do not experience any of the following problems: inadequate control over work, conflicts in harmonising work and other areas of life, insufficiently rewarding work, insufficient social support at work, stress and job dissatisfaction. The wellbeing index is based on the responses to the health survey conducted by Terveystalo.

Mental health-related absences have decreased both in comparison to the previous year and over a longer period. In 2025, there were a total of 1,070 absence days due to mental health reasons, compared to 1,371 days the previous year. Between 2020–2025, mental health absences decreased by as much as 60 per cent, dropping below the reference baseline at Terveystalo. Since 2020, mental health-related absences have decreased each year while job satisfaction has increased.

The majority of Fintraffic personnel are in operative duties, working at all times of the day, including night shifts. Consequently, Fintraffic has

Absence days for mental health reasons 2020–2025



found it particularly important to support staff health and well-being. In addition, there is a significant financial incentive to main sick leaves at a low level, as substitutions for absences in traffic control staff nearly always require overtime, imposing considerable costs to the employer. We support staff well-being through various means, including comprehensive occupational health care, high-quality early intervention practices, work ability assessments and by supporting recreational activities and healthy lifestyles among staff.

Our efforts have achieved measurable successes, as demonstrated by our groundbreaking weight management and lifestyle project Fit For Future Fintraffic. The project aims to inspire permanent weight management and to support motivation for personal wellbeing with the help of a multiprofes-



sional team. The occupational health care provider selects the participants from interested employees. To support their weight management, the participants are prescribed weight management medication under the supervision of an occupational health physician. The results of the programme are excellent. 67 per cent of participants achieved significant weight loss, averaging 12 kg.

Overall well-being among staff has improved in this area. In 2022, 27 per cent of Fintraffic staff was overweight; in 2025 this figure had dropped to approximately 20 per cent. Overweight is frequently accompanied by an associated disease, such as diabetes. Diabetes is an important consideration for staff as it forms an obstacle to working night shifts. The occurrence of overweight in Terveystalo reference data stands at 25 per cent, a figure that has remained constant during the corresponding five-year review period.

At Fintraffic, responsibility is reflected in good leadership, capacity for reform, and appreciative corporate culture. In addition to the values drawn up together, our corporate culture is based on respectful interaction, openness and working together. We do socially meaningful work in which everyone's contribution is important, regardless of their duties or job titles.

Fintraffic has received of the Hyvän Mielen Työpaikka® (mental-health friendly workplace) certificate multiple times in recognition of its commitment to promoting mental health.

Responsibility for communities

We promote safe, smooth and environmentally friendly traffic by developing traffic control and digital ecosystem services. By taking care of societal preparedness and reliable transport services, we can respond to the needs of society efficiently and reliably. This supports the transport system in benefitting all of society while reducing the harmful effects of transport, including emissions and accidents.

This ambitious target could not be achieved without close partnerships with our stakeholders. In our partnerships, we promote trust, openness and sustainable practices.

Continuous development of our stakeholder work is therefore necessary, so that we can work together to generate as much benefit as possible for people, companies and Finland as a whole.

Corporate culture should not be taken for granted. As we live up to our values, care for safety and dare to reform, we simultaneously build a workplace where each individual and their growth is meaningful. It is a promise – to each other and to those who interested in joining us. Fintraffic employees say:

“Our task is socially important, a unique opportunity to develop Finnish the traffic system. We at Fintraffic are genuinely care about our work, colleagues and customer experience, whatever the time of day. Fintraffic is a safe workplace where everyone feels welcome.”

“Fintraffic corporate culture is built on a strong foundation: we have shared values and a will to create a workplace where everyone feels safe, respected and a part of the community.”

“The company and its work community are excellent. Our work has a genuine impact for Finland and Finns. This is a great source of pride, and worth developing together.”

“The company values set together with our staff provide a positive foundation for our corporate culture, and I find them solid. Our daily work reflects these values well.”



Our goal is to prevent hazardous situations, shorten travel times and reduce congestion and travel emissions through traffic control and digital ecosystem services. At the same time, we aim to improve the operating conditions of public transport and develop new, innovative and cost-effective services that better meet the needs of consumers and end users.

The safety of traffic control remained at a high level throughout 2025 across all modes of transport. In addition to traffic safety, data and cyber security is a key theme of our safety work.

Responsibility for good governance (G)

Fintraffic's financial responsibility is based on how much benefit we can generate for society with the resources at our disposal. We provide nationwide, correctly scaled traffic control and management services cost-effectively and with moderate profitability. We promote the smooth running, safety and efficiency of transport, which reduces transport emissions, congestion and accidents.

We modernise traffic control services and develop the traffic data ecosystem by enhancing the efficiency of travel chains and logistics, and thereby increase Finland's competitiveness.

We are a responsible and reliable partner for both the public sector and private operators that provide transport-related services or make use of the information produced by Fintraffic.

We are committed to responsible and cost-effective use of funds. This means that we follow precise procedures and practices to ensure that our funds are spent efficiently and responsibly.

We strongly emphasize good governance and have zero tolerance for corruption and bribery. This is of paramount importance to us, and we are proud of following strict ethical business practices. Data protection and cyber security are crucial at Fintraffic. We continuously develop our information systems and ensure that they are secure and that personal data is processed confidentially and securely. Compliance with the guidelines and policies of our management system is key to our work and helps ensure transparency and consistency in all actions and decisions.

We acknowledge the opportunities provided by artificial intelligence and the associated risks, and therefore we strive to utilise artificial intelligence with caution, responsibility and integrity.

Read more about our sustainability policy and measures in the sustainability report.



IMPACT

Benefits for the whole of Finland: developing services with less disruptions and emissions, and shorter waiting times

Fintraffic's services and open data have an extensive impact on the functionality and safety of the traffic system, the accessibility of Finland and its different regions, the daily lives of households, the operations of companies, and the Finnish society as a whole.



Together with our partners, we aim to help the transport system generate benefits for society in multiple areas, especially the following:

1. Safe, smooth and environmentally friendly transport.
2. Societal preparedness and reliable traffic services.
3. Cost-effective traffic.
4. Smooth cooperation between traffic sector operators.
5. The growing traffic data economy, market and export.

Traffic management services, digital services for companies and consumers and up-to-date traffic information accelerate Finland's development into a pioneer in sustainable transport and logistics. There

is enormous potential for improving the efficiency of the traffic system: in 2022, the logistics costs of Finnish companies averaged 13.8 per cent of the turnover (Logistics Report 2023, University of Turku). In 2022, Finnish households spent 13.5 per cent of their disposable income on travel (Statistics Finland 2023).

If travel and transport chains were five per cent more efficient, through shorter waiting times, for example, households' travel costs would decrease by approximately EUR 700 million and companies' costs by EUR 2.5 billion. Increased efficiency would also do a great deal to reduce emissions from traffic.

Fintraffic's services reduce climate emissions from transport by more than their production causes. Our carbon handprint is therefore considerably larger than our footprint.



	Proportion of continuous descent approaches (main airport)	Air route efficiency	Unit price for air route services
Finland	60.4%	96.28%*	€ 78.09
Sweden	47.1%	98.28%	€ 94.70
Norway	57.5%	98.39%	€ 54.32
Denmark	46.0%	98.56%	€ 90.67

* Air route efficiency is affected by sanctions on Russian airlines and the use of international waters. Without UMKK traffic (Russia-Kaliningrad), Finland's efficiency figure would be 98.4%
Source: Eurocontrol

How we make an impact

This is how we generate benefits for Finland:

- Accelerating the development of new travel and logistics services through digitalisation and a common set of rules and practices for the sector;
- Maintaining and sharing a real-time situational picture of traffic, open data;
- Optimisation of routes, speeds and distances between vehicles to prevent congestion and hazards and reduce emissions through traffic control services.
- Improving the flow of information between operators to prevent and resolve disruptions;
- Automation-driven efficiency;
- Making investments in traffic routes and using data to optimise their use and maintenance;

- Increasing the attractiveness of public transport, for example, by reducing the impacts of disruptions and building more uniform datasets for the use of public transport operators;
- Sharing data and providing traffic management services to support effective official action.

Read more about the means of traffic management to generate benefits for the transport system and society in the sections on each business area.

The data economy already creates hundreds of millions of euros in value for transport

In addition to transport mode-specific traffic management services, Fintraffic impacts society by promoting the interoperability of transport modes and the operation of the overall transport system in many ways.

We are working with a variety of other operators to build a data ecosystem that is open to everyone in the traffic sector. Enhanced utilisation of data within this ecosystem will help to promote the development of new services. The traffic data ecosystem coordinated by Fintraffic aims to provide competitive and scalable transport and mobility services for both Finnish and international markets – solutions that will enable safe, low-emission and user-oriented travel and logistics chains that combine different modes of transport.

Based on EU Commission reports, the data economy already generates value counted in hundreds of millions of euros in the traffic sector in Finland. According to a study conducted by Fintraffic and the consulting firm FLOU in 2024, Fintraffic's share of the transport data economy has grown from 4% to 6% between 2023 and 2024. This is due to increased data sharing and new end-user services, such as Fintraffic App.

In 2024, the direct benefits of the transport data economy produced by Fintraffic were estimated to be over EUR 20 million. With broader societal benefits included, the added value produced by Fintraffic to the data economy was up to approximately EUR 54 million.

The use of Fintraffic digital services increased by nearly 50 per cent from 2024 to 2025. The number of ecosystem members increased to 237 during the same period.

The figures show that the impacts of the transport data economy are significant and constantly increasing, which benefits both companies and society, for example, through improved safety, reduced travel times and saved costs.



Fintraffic data affects everyone in Finland, every day

Fintraffic data	Data users (services/organisations)	Estimated impact (e.g. number of weekly users)
Situational picture of road traffic and disruption data for consumers	• Yle Radio Suomi (traffic information on radio) and Radio Nova (commercial radio) and other Bauer Media channels	• Yle Radio Suomi ~1.5 million weekly listeners • Radio Nova ~1.0 million weekly listeners
	• Google Maps, Apple Maps, Waze, HERE, TomTom, and other map/satellite navigation services	• Total approx. 2–2.5 million weekly users (of which Google Maps accounts for ~2 million)
	• Tilannehuone	• Tilannehuone attracts tens of thousands of user every week and is utilised by almost all media.
Road traffic situational picture, disruption data and traffic statistics for professional users	• Destia (road network maintenance)	• Situational picture data is extensively used in national road maintenance
	• Tietorahti map (application for professional drivers)	• Used by circa 25,000 HGV drivers
	• Transport statistics: multiple Finnish companies.	• Multiple companies, including insurance companies and service station chains, use transport statistics for planning their business operations
Road camera images and road weather data	• Finnish Meteorological Institute • Foreca	• Foreca.fi: ~400,000 to 500,000 weekly users • The Finnish Meteorological Institute uses Fintraffic data in its forecasts and services; significant impact
	• Kelikamerat.info + many other services	• Various weather camera sites attract tens of thousands of users every week. A total of 3.37 billion downloads in Digitraffic in 2025
Public transport route and timetable data (stops, routes, timetables)	• HSL and Public Transport under the Waltti network • VR, Matkahuolto • Apple, Google (route-finding and timetable services) • Information for rail passengers (e.g. platforms)	• Route-finding and timetable services used by ~2.5 million public transport passengers each week
Digitransit location and routing data	• Etuovi.com (residential spatial data and local services data) • Tourism sector operators	• Over 800,000 weekly users (Etuovi.com)
Feedback via the feedback channel (user-reported road condition and safety observations)	• Maintenance contractors (road maintenance contractors)	• Feedback used by ~1,000 road maintenance professionals (data used to improve maintenance measures and improve overall traffic safety)

The digitalisation of traffic creates new opportunities

By making information openly available and combining real-time data, it is possible to optimise the mobility of people and goods to a new level. The Fintraffic App is a prime example of a digital service that contributes to better functioning traffic. The application provides road and rail traffic users with various information, including weather and disruption information and information on trains. The service contributes to safe and smooth traffic.

Data can be collected and processed through crowdsourcing not only from Fintraffic's own sources and its partner network but vice versa as well, by harnessing the data produced by transport users and increasingly smart vehicles.

In rail traffic, the track capacity can be significantly increased with the aid of new train control systems (the Digirail project). Several digitalisation-based development projects are also underway in other modes of transport, and they will pave the way for optimising the entire traffic ecosystem. They include improving information exchange in road traffic control, creating a situational picture of Finland's lower airspace, introducing digital consignment notes, and providing a maritime traffic notification service.

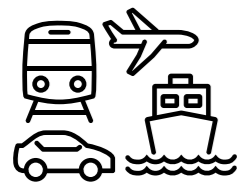


HOW WE CREATE VALUE FOR SOCIETY

Driving the safest, smoothest and most environmentally friendly traffic system in the world

OUR WORK:

Traffic control and management services



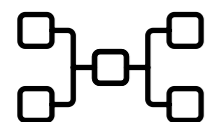
- Air Navigation Services
- Rail traffic control and management
- Road traffic control and management
- Vessel traffic control and management

Digital end-user services (digital services)



- Situational picture of traffic
- Public transport and logistics data services
- E-services for various customer groups

Data ecosystem and export cluster



- Outlining of market opportunities and customer work

Compilation and distribution of traffic data



- Collection, processing and sharing of data
- Promoting data crowdsourcing
- Development of a digital twin

BENEFITS COCREATED WITH OUR PARTNERS:

Safe traffic

Smooth and efficient traffic

Reduced traffic emissions

Data ecosystem cooperation & growing data economy



Impact metrics 2025

Safe traffic

Rail passenger safety was ranked **1/29** among EU countries

Accidents or serious incidents resulting from Air Navigation Services **0**

Serious accidents resulting from Rail Traffic Management **0**

Vessel Traffic Services proactively intervened in the passage of vessels approximately **18,000** times to ensure safe and smooth transit

16 incidents prevented in vessel traffic, of which **8** were vessels prevented from running aground

Road Traffic Management reduces accidents resulting in injury or death by approximately **150** per year***

Efficient traffic

Delay prevention in Finnish airspace saved **416,500 flight minutes (= EUR 41 million)** vs. the EU average*

The **punctuality rate** of long-distance train services was **89%** (2024: 78.5%) whereas commuter trains achieved a rate of **95.4%** (2024: 92.8%)

Saved travel time on roads amounted to approximately **500,000 vehicle hours*****

D/S POLO enhances maritime logistics through real-time and situational information, achieving a customer satisfaction score of **4.59/5**.

Road Traffic Management benefitted society to an equivalent of **EUR 75 million*****

Climate change-mitigating traffic

Prevention of delays in Finnish airspace saved **69,500 t in CO₂ emissions** vs. the EU average*

Continuous descent approaches saved **14,700 t in CO₂ emissions** vs. the EU average*

Rail traffic was calculated to have reduced **CO₂ emissions by 740,000 tonnes****, equivalent to the annual emissions of over 389 000 cars.

CO₂ emission reductions in road traffic equalled **13,000 tonnes*****

Cooperation in the data ecosystem

237 operators are committed to the data ecosystem

The value created by Fintraffic for the transport data economy amounts to approximately **EUR 54 million** (vs. EUR 40 million in 2022)

Overall perceived benefit of the ecosystem (scale 1–5, Survey Dec/2025)

- overall grade for the ecosystem **(3.85)**
- perceived benefits of the ecosystem to operators business **(3.88)**

Sales attributed to the export cluster **EUR 13.5 million**

Nearly **50%** growth in the volume of data shared in the Fintraffic ecosystem

Number of interface calls to the open data interfaces: **20+ billion**

Persons benefitting from Fintraffic services in Finland **4.1 million**

Number of companies providing brokering and connecting services in travel chains: **66** (vs. 60 in 2024, Traficom: Transport Market Review)

*Calculations based on Eurocontrol values

** Assuming that rail traffic replaces road passenger traffic.

*** Source: Fintraffic Road Analysis, based on VTT NEXT-ITS 2 Evaluation



How we make an impact in air traffic

Air traffic enables both Finland as a whole and its various regions to remain easily accessible. The high standard of Fintraffic's Air Navigation Services guarantees a safe and cost-effective airspace, direct air routes, and landings using continuous descent approach at Helsinki-Vantaa Airport. This substantially reduces both climate emissions and noise pollution, and lowers the cost of flying. The safe and smooth services provided without delay contribute to efficient operations of airspace users. The aim is to make Finnish airspace the most efficient and environmentally friendly in Europe by optimising flight routes, utilising larger volumes of data and increasing automation. According to the 2025 customer satisfaction survey, the services have remained functional and safe, and the overall rating for cooperation with various aviation stakeholders has increased.

The Airspace2027 project will update the Finnish airspace to meet the changed user needs in aviation. The project will take into account safety, green energy, reduction of emissions, new user needs, uncrewed traffic and the use of lower airspace. In addition, efforts will be made to make airspace available to new operators and to support the achievement of environmental objectives at both national and EU level.

How we make an impact in vessel traffic

Finland has pledged to achieve the emissions reduction targets set by the EU and the maritime emissions reduction targets set by the International Maritime Organization (IMO). Fintraffic's Vessel Traffic Services are contributing to the preservation of the Baltic Sea as one of the most competitive regions in the world, where traffic is smooth, safe and conscious of the fragile marine environment.

Baltic Sea expertise integral to Fintraffic's Vessel Traffic Services ensures smooth merchant shipping in the shallow sea and around its multiple reefs, in addition to safe sea traffic during the winter season. Fintraffic Vessel Traffic Services and safety radio operations ensure safe and smooth passage of marine traffic. 24/7 surveillance and professional VTS operators prevent accidents and any environmental damage this could cause in the Baltic Sea and Lake Saimaa. This promotes Finland's foreign trade, safe shipping and the protection of marine environments.

In addition to this, we are developing new service models for data and snapshot services, such as D/S POLO, where close cooperation between maritime actors and new digital solutions promotes the exchange of data and building a snapshot of maritime traffic and its logistics chains. D/S POLO was adopted at more than 30 ports, with hundreds of daily users. The application is in use in more than 30 ports across Finland and Sweden and in a few hundred organisations. In addition to improved information sharing and communication, POLO provides live arrival and departure times of ships, berth and resource planning, vessel notifications in the EU, invoicing, emission calculations, tug and pilot requests, mooring and unmooring orders, and water and waste management orders. The service can help to both improve the efficiency of port operations and to strengthen sustainable development.



How we make an impact in rail traffic

Fintraffic's rail transport services improve the smoothness, safety and passenger experience of rail traffic. They make railways an increasingly attractive and environmentally friendly choice. Traffic control, capacity management and traffic planning ensure that goods and passengers can reach their destination safely and on schedule. Our Operating Centre ensures electrical safety and any voltage cut-offs required for track work. Rail traffic is an especially safe mode of transport, and Finland was number one in the EU comparison in rail passenger safety in 2013–2023.

The Fintraffic passenger information service provides live information on rail traffic and any delays. The services provide content for station info screens, announcements and the Junalähdöt.fi service. The Fintraffic Situation Centre provides railway sector operators with

a situational picture and consumers with media communications. In addition, foresight and information sharing play a key role in preventing accidents, delays and environmental damage.

We make great efforts to drive preparedness, for example, in the technical duplication of Fintraffic information systems.

How we make an impact in road traffic

Fintraffic's road traffic management services ensure smooth and safe traffic in Finland 24 hours a day. This is achieved by means of continuous surveillance of traffic and road conditions and by sharing an up-to-date situational picture to different user groups. Fintraffic produces 300,000 road camera images every day and will collect even more observations in the future through crowdsourcing.

We improve traffic flow and safety, for example, with the aid of traffic lights, tunnel technology, road weather data and variable speed limits. Fintraffic also enables automatic traffic surveillance by the police. Our Traffic Management Centre issues traffic bulletins covering the entire road network and ensures that any incidents are managed effectively through cooperation between the authorities.

Open-data solutions enable us to share our data with, for example, vehicle navigators and the media without any delay. Traffic information plays an essential role in road maintenance and decision-making.

Road weather services: Road weather services cover the entire Finnish road network, and their impact is particularly significant in reducing accidents, annually preventing 67 accidents resulting in injuries or death. This saves more than EUR 30 million each year*.

Automatic surveillance: The impact of automatic traffic surveillance in reducing accidents is considerable, annually preventing 48 accidents resulting in injuries or death. This saves more than EUR 21 million each year*.

Traffic lights: Traffic lights also have a significant impact on reducing accidents, annually preventing 23 accidents resulting in injuries or death. This saves more than EUR 10 million each year*.

Fintraffic's road traffic management services bring great societal benefits by reducing travel times, accidents and carbon dioxide emissions. The total socio-economic benefits of our services amount to approximately EUR 75 million per year*.

* Impact assessment of Fintraffic Road services 2024, Traficon Oy (based on 2023 data)



Business



AIR NAVIGATION SERVICES

Air traffic effectively ensures that Finland remains easily accessible

Fintraffic Air Navigation Services provides safe, accurate and competitive air navigation services. We are responsible for managing Finland's airspace and providing air route services and air navigation services at 22 Finnish airports.

In addition to monitoring and managing air traffic in Finnish airspace and airports, we are also responsible for infrastructure planning and maintenance and the systems required for operations compliant with international requirements.

Technical air navigation services include the maintenance of radar, navigation and radio equipment in Finland and Sweden. In addition, we offer training and consulting services as well as services for drone operators. Our tasks also include special assignments related to aeronautical search and rescue as well as area supervision.



Turnover EUR (88.7) million

96.6

Number of overflights (65,661)

55,613

Personnel, average (425)

436

Number of flights in Finnish airspace (241,876)

240,597

Customer satisfaction (4.0)

4.0

Take-offs and landings at Helsinki-Vantaa Airport (153,142)

157,782



U-level cooperation

addresses both environmental impacts as well as the safety and cost-efficiency of aviation. Single European Sky (SES) – that is, a joint European airspace – aims to digitalise air navigation services in order to centrally manage and share aeronautical information.

Air navigation services were provided for approximately 220,000 flights and to nearly 158,000 take-offs and landings at Helsinki-Vantaa Airport. The number of overflights decreased to approximately 55,600 as the presence of Chinese airlines in Finnish airspace reduced.

High-quality and evolving air navigation services

Based on the annual customer satisfaction survey, our customers found that our air navigation services remained reliable and safe. For Air Navigation Services, the overall average was 4,0. For reliability and safety, the corresponding figure was 4.2.

OUR STRATEGIC OBJECTIVES



We are the best in Europe in terms of the punctuality, preparedness for exceptional circumstances and the environmental efficiency of air traffic. Air travel is the safest mode of transport. Our services are among the most cost-effective in Europe.



Our operating environment meets customer needs for airspace structures, airspace use and infrastructure and provides cost-effective air navigation services.



Services at some airports are provided by means of remote air traffic control.



Together with the Estonian Air Navigations Services agency (EANS), we are responsible for flight route services in Finland and Estonia.



We sell many commercial services related to air navigation in separately agreed market areas.



PROGRESS TOWARDS OUR GOALS IN 2025

The tendering process for the Multi Remote Operating Tower (MROT) remote air traffic control project was completed in July and its winner chosen. However, the project proceeded to the Market Court, and contract negotiations are still pending due to the appeal process. The schedule and details of the project will be specified as the negotiations progress.

The preparation of the cross-border air navigation service (FINEST) continued in cooperation with the Estonian

Air Navigation Services agency (EANS) which provides services in Estonia. The impacts of the change in the operating environment have been analysed for the current operating models, with FINEST methods jointly agreed for them. Preparation of national treaties continued.

The key objectives of the Airspace2027 project are aviation safety, acknowledgement of national defence needs, competitiveness and

accessibility, environmental and sustainability considerations, and consideration of all airspace users. Changes resulting from the project have been planned and simulated. The preliminary review of changes was completed in December.

The sale of air navigation services continued successfully. A new customer, Avia College, trained Azerbaijani aeronautical weather professionals. Finnish air traffic controllers were also trained in 2025.



The high quality of air navigation services is demonstrated by the ISO 9001 quality system certificate granted previously as well as the ISO 27001 certificate issued in 2025. These also demonstrate a high level of and systematic approach to data security and risk management.

Fintraffic Sky, the aeronautical situational picture application, was launched in the spring. The open service collates essential and real-time aeronautical data in one place and offers various functions, such as drafting flight plans. Towards the end of the year, the online service was further developed in cooperation with the Finnish Meteorological Institute by adding statutory aviation weather services and weather services tailored for aviators.

The TopSky ATCOne procurement contract for the main air navigation system was signed in December. The procurement is carried out in cooperation with Estonian and Czech air navigation services organisations.

The EU Commission confirmed the efficiency targets for air navigation for 2025–2029 as part of the RP4 performance plan. Due to cost-effective service provision, the 2025 actual costs of air navigation services were below the reference costs in the performance plan. Due to the lower invoiced service units resulted by the Russian war of

aggression in Ukraine, the flight route service was unable to achieve the unit cost target. On the other hand, helped by the increased number of service units, the unit costs of air traffic control services at Helsinki Airport fell below the level set in the performance plan.

Read more about Air Navigation Services at: www.fintraffic.fi/en/air_navigation





VESSEL TRAFFIC SERVICES

Shipping is vital for Finland

Effective and efficient maritime logistics are essential for Finland's foreign trade and competitiveness, as 96 per cent of our exports and imports are transported by sea. Fintraffic's Vessel Traffic Services is responsible for ensuring that 24/7/365 that vessel traffic runs safely, smoothly and uninterruptedly.



Potentially prevented groundings (14)

8

Turnover EUR (20.8) million

23.2

Proactive vessel contacts

18,000

Personnel, average (106)

110

User count, D/S POLO

+25%



intraffic's Vessel Traffic Services

ensures safe and competitive shipping in Finnish waters while enabling new opportunities for the use of digital technology by developing new digital services for maritime transport operators. This is versatile development work, especially in regards to vessel traffic services and traffic management as well as data management systems. We have expanded our portfolio with services that enhance maritime logistics and port operations and promote the management of environmental emissions.

Vessel traffic was smooth and safe throughout the year

Due to rising security tensions in Europe, the operating environment for shipping has changed in recent years, particularly in the Gulf of Finland. Continuous GNSS disturbances and operations of the Russian shadow fleet require greater vigilance at Fintraffic Vessel Traffic Centres.

OUR STRATEGIC OBJECTIVES



In addition to the best traffic control in the world, we provide high-quality digital services for maritime transport and logistics.



We emphasise responsible operations, invest in smart solutions and support cooperation between stakeholders. We pioneer development in the sector with innovative services and new technologies that improve safety and logistics and reduce environmental impacts.



We improve the safety and reduce the emissions of maritime transport and improve the efficiency of maritime logistics in Finland. This reduces the cost of logistics, which is reflected in reduced costs of industrial production and lower consumer prices, which strengthens Finland's competitiveness.



WHAT PROGRESS DID WE MAKE IN OUR GOALS IN 2025?

We launched our first S-100-based digital navigation services compliant with international standards, forming the basis for a future digital maritime navigation environment. Further development will be supported by EU funding via the Fintraffic-coordinated NELSON project.

We developed a situational picture service for managing the increased satellite positioning disruptions in merchant shipping. The service is intended for both authorities and seafarers.

Our national maritime information management system Nemo reached technical production capability in EU regulation-compliant format. The new deployment schedule for Nemo was confirmed and the mandatory deployment of the system will begin on 1 January 2027.

New users signed up for the expanded D/S POLO service: the userbase increased by 25%, and various data, including winter navigation data, was added to the application.

We strengthened business continuity with a company-wide continuity management model (ISO 22301). We supported the implementation of data protection with an integrated management model for the quality and management system.



The operational reliability of our vessel traffic service centres was at a good level in 2025. Basic traffic management staff maintained their high standard and complied with agreements.

We monitored traffic and notified vessels about any factors that may affect their passage, such as other traffic, potentially hazardous situations, weather and ice conditions, and safety equipment failures. During the year, we potentially prevented eight vessels from running aground. We also assisted vessels with navigation, and prevented near-misses from evolving into accidents, protecting fragile marine environments in the process. The vessel traffic service centres also managed the national maritime safety radio traffic and emergency radio traffic in the Saimaa region.

In 2025, vessel traffic safety was strengthened through an assessment of additional safety zone requirements for special transports along the Finnish coast.

These safety zones are used for ensuring the safe passage of special transports such as LNG and LPG tankers: A dedicated safety zone is established around tankers, prohibiting unauthorised approach by other vessels. This ensures the unhindered passage of special transports on fairways where traffic is busy or conditions require particular caution. Fintraffic Vessel Traffic Centre establishes safety zones based on needs, monitoring and controlling traffic within. New safety zones have been introduced as of 1 January 2026 for the Tornio and HaminaKotka merchant shipping fairways.

Read more about Vessel Traffic Services:
www.fintraffic.fi/en/maritime_traffic





RAIL TRAFFIC MANAGEMENT

Safe, efficient and environmentally friendly rail traffic

We are tasked with ensuring that passenger and cargo transport on Finnish railways is safe, smooth and environmentally friendly. We do so in close collaboration with our partners. Our work is significant for the country as a whole, as more than half a million trains and tens of millions of passengers travel in the Finnish rail network every year.



Turnover EUR (90.1) million

88.8

Personnel, average (495)

475

Number of trains (+6.0% vs. 2024)

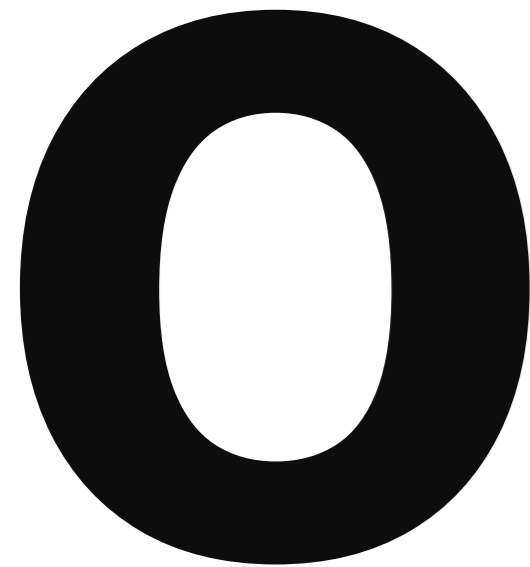
582,978Punctuality (timely or early arrival)
(+5.1% vs. 2024)**92.9%**

Malfunction alarms (-20.0% vs. 2024)

14,638

Number of calls (-13.7% vs. 2024)

1,525,730



Our services include

railway traffic control, capacity management and traffic planning to coordinate track work and train traffic. In addition, we provide passenger information services for train passengers. Our operating centre is responsible for the supervision and operation of the catenary system. The Security Monitoring Service is responsible for the railway network surveillance cameras.

Our Operations Centre is responsible for national-level supervision of the railway network, rail traffic control, and for coordinating operations in the event of disruptions or accidents. Our service packages include the Rail Traffic Management Centre, the Situation Coordinator service and the traffic quality control room. The Operations Centre is responsible for providing stakeholders operating in the railway system and the media with a situational picture of the rail network.

We are responsible for realising the development and verification phase of the Digirail project as a service, aimed at reforming the train control system.

OUR STRATEGIC OBJECTIVES



We renewed the traffic control and management system to improve the safety, smoothness and environmental friendliness of rail traffic.



We are developing operations to improve their safety, effectiveness and efficiency.



We are driving uniform rail transport data to enable the creation of a digital twin in rail transport.



WHAT PROGRESS DID WE MAKE IN OUR GOALS IN 2025?

We launched the Atlas project package in order to reform traffic control and management systems.

We made significant improvements in business continuity and preparedness on multiple levels.

We improved railway safety.

We initiated the recruiting process for traffic controller trainers and received nearly 3,000 applications.

We brought railway sector actors together to create a joint roadmap for building interoperable data management.

We expanded capacity control to cover all of Finland and deployed the Saaga system in railway yards.

We finished commissioning our new premises in the Helsinki Metropolitan Area.



2025 marked significant advancements in Fintraffic's Rail Traffic Management. We systematically developed Finnish rail traffic with emphasis on promoting safe, smooth and environmentally friendly traffic and more efficient operations. Our role as a developer and driver of digital services was reflected in new technologies and digital solutions. Additionally, we restructured our operations to better align with our new development journey.

In 2025, we expanded our traffic control and management services. We initiated significant investments in the development of the new rail traffic control and management system (Atlas project). The new system improves the smoothness, safety and quality of traffic management and enables more extensive automation. The project schedule aligns with that of Digirail, with an estimated cost of EUR 200 million by 2040.

The development work remained focussed on the Digirail project, the development and verification phase of which progressed as planned. The impacts on operative activities and tools were assessed in extensive cooperation between the different rail traffic management operators and stakeholders. The construction of the first commercial section of Digirail (Lielähti-Pori/Rauma) progressed, and the joint European radio-based ETCS system and automatic train operation (ATO) system were tested on the Kouvola-Kotka/Hamina section. Fintraffic and

the Finnish Transport Infrastructure Agency agreed on continued cooperation as detailed in the Digirail development and verification alliance model.

The reform of remote rail traffic control systems continued, and the deployment of remote rail traffic control in Northern Finland progressed as planned.

The railyard management system (Saaga) was introduced nationally in capacity management services, and the system was extended to cover new operators. We also began developing a new capacity management system (Sofia) that will replace the current, ageing system.

In 2025, we conducted a study on the digital twin of rail transport, compiling a sector-wide understanding on the basic requirements for the digital twin. The study clarified the current state of rail transport data and increased the capacity to coordinate the development of interoperable data. Developing the knowledge base for rail transport enables the leveraging of more advanced knowledge-based solutions and the full benefits of the Digirail and Atlas project across the entire sector.

For safety, our main focus was on improving the safety of track work in cooperation with the Finnish Transport Infrastructure Agency. We also improved the continuity of our operations and our preparedness.

Read more about Rail Traffic Management:
www.fintraffic.fi/en/railway-traffic





ROAD TRAFFIC MANAGEMENT

Safe and smooth road traffic 24/7

Finland's passenger and goods transport relies on smooth and efficient traffic on our roads. Fintraffic's Road Traffic Management offers and develops services that contribute to safe and smooth traffic on the road network every day of the year. Our goal is to enable the safest, smoothest and most environmentally friendly road transport in the world with the help of smart services and an extensive partner network.



Turnover EUR (54.5) million

55.1

Personnel (96)

98

Traffic bulletin

11,000

Number of calls

100,000

Contractor messages

46,000

Automatically created notifications of prevailing traffic or road conditions for tunnels or open sections

530,000



o ensure the functioning of our operative traffic control, our work encompasses a number of topics from technical system design for roads and tunnels to continuous traffic monitoring, the provision of road weather data, and the formation and distribution of a real-time situational picture of traffic. All of this is thanks to our skilled and content personnel.

Investments in operational reliability and system renewal

Our 2025 work on road traffic control continued with bolstering operational reliability and lifecycle upgrades to equipment. New solutions were implemented at several tunnel sites as well as for the telecommunications network, traffic calculation and roadside control devices and systems. National and international cooperation continued, creating a more comprehensive situational picture and ensuring a reliable response to disruptions.

OUR STRATEGIC OBJECTIVES



We are building Digitie: We are laying the foundations for smarter, more sustainable and safer road traffic. In the Digitie project, we automate road traffic control and management to enable the provision of proactive and real-time services. We make full use of intelligent digital solutions, while responding to the regulatory requirements of the sector and the information needs of the administrative sector's digital twin.



We ensure the competitiveness of road infrastructure: Our assets are managed using a knowledge-based lifecycle management model that enables comprehensive, predictable and cost-effective maintenance and replacement investments. We make cost-effective replacement investments using productised solutions, assessing their impacts.



We manage organisations with knowledge: We utilise advanced analytics and modern technologies. With high-quality data, we enable the construction of digital services and a digital twin.



WHAT PROGRESS DID WE MAKE IN OUR GOALS IN 2025?

We maintained operational reliability by renewing the Helsinki Metropolitan Area Traffic Management Centre, Helsinki, which was at the end of its life cycle. The site is also used by the Road Traffic Centre.

We improved operational reliability by continuing to develop emergency preparedness measures between road traffic centres.

We responded to the changes to the operating environment and the associated tightening requirements by strengthening data security and developing continuity and data management.

We published technical interfaces that enable the sharing of safety (SRTI) and real-time traffic information (RTTI) to everyone in compliance with the EU Intelligent Transport Systems (ITS) Directive. The EU Data for Road Safety cooperation will continue alongside during the new period until 2029. During the cooperation, traffic data will be collected for use in research and hands-on traffic work for improving road safety across different countries. In addition, we continued our research cooperation with various universities, utilising AI in transport risk assessment and other tasks.

Life cycle reforms were extensively implemented in roadside traffic control equipment and systems. The EU-funded life cycle reform of the Vuosaari tunnel technical systems was initiated, and the tunnel's backup route was improved and tested. In addition, we signed an alliance agreement for the E18 Raisio City Centre Point project which progressed closer to the development phase during the year.

We modernised our service production and piloted and introduced new technology solutions that include traffic measurement and road weather observation equipment and traffic lights.



Reliable announcements and services, smooth traffic

Traffic in the road network was relatively smooth, and large-scale deviations were avoided. We collected data and refined it into data streams. Data was produced for us not only by our partners but a total of about 20,000 traffic control devices, and road condition and weather stations. Information about weather and road conditions, and disruptions flowed between different authorities, such as the police and rescue services, and between road traffic centres. Real-time road weather data was also widely used in road maintenance, in which the importance of road weather information was emphasised especially during the winter season.

The information on weather and road conditions also flowed directly to road users who heard our traffic bulletins on the radio, for example, or received the information directly to their vehicle's navigator. In total, we made 11,000 traffic announcements and received 100,000 customer calls.

The 2025 road user satisfaction survey confirmed that information on road transport disruptions was reliable and continued a high level as was the trend in previous years.

Read more about Road Traffic Management:
www.fintraffic.fi/en/road_traffic

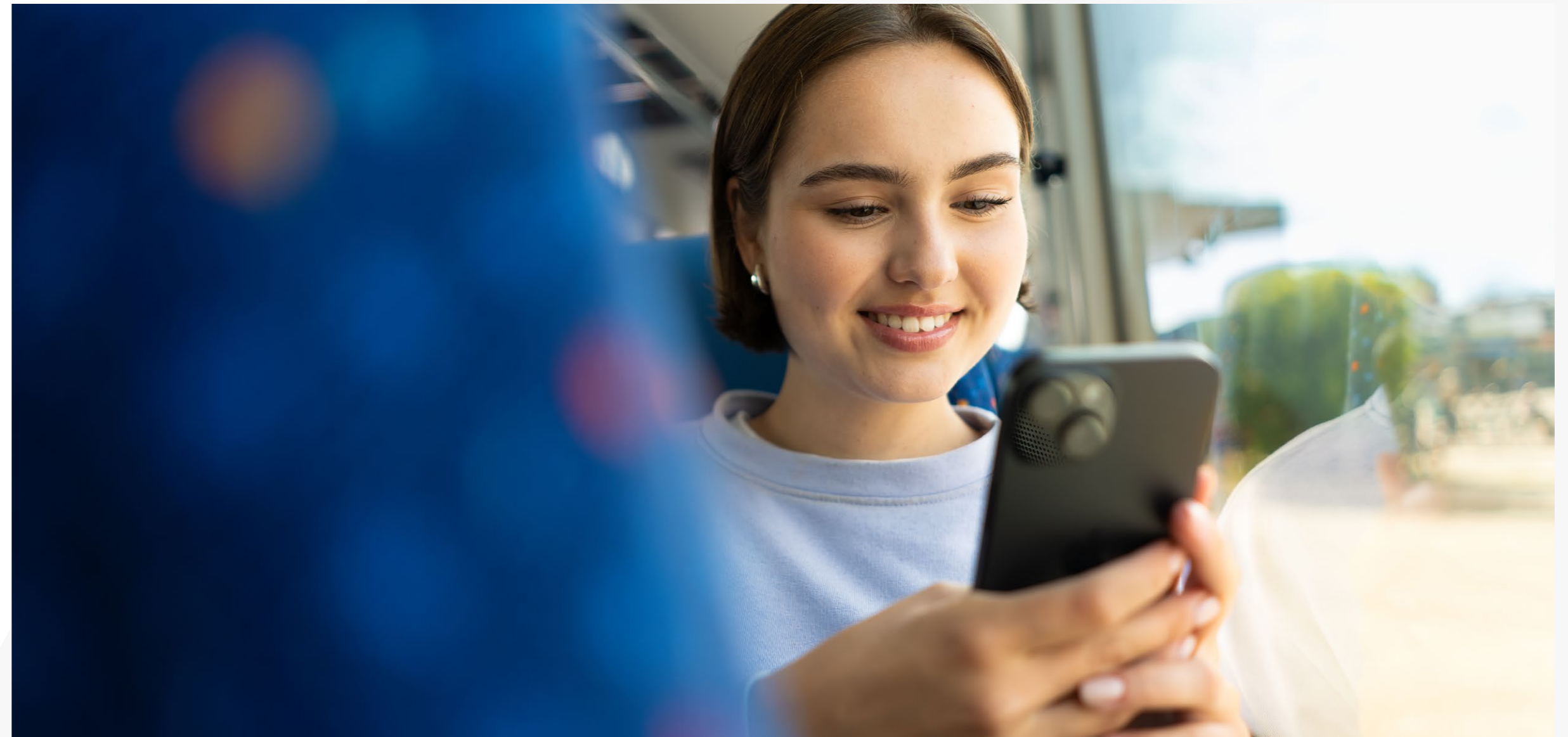




TRAFFIC DATA ECOSYSTEM SERVICES

The use of Fintraffic's traffic data services continued to grow

2025 saw an ongoing increase in the use of data services. The number of visits increased by nearly 50 per cent year-on-year. Additionally, we had an active role in preparing the Act on Digital Information Services for the Transport System, which entered into force at the beginning of 2026. This Act introduced new tasks for Fintraffic as a traffic data distributor, strengthening our role as the hub for traffic data.



Turnover EUR (3.4) million

4.0

Personnel (7)

8

Data ecosystem team members' perception of meaningfulness

3.88

Visits to digital services (7.8) million

11

Fintraffic App downloads (56,000)

130,000

Types of shared data

79



The use of Fintraffic App accounted for 70% of the use of Fintraffic’s digital services in 2025. With 68,000 new downloads, the app had been downloaded nearly 130,000 times by the end of the year. In addition, the user experience of Fintraffic App, the Traffic Situation service and the National Journey Planner were improved, and new types of information were introduced in these services.

We had an active role in preparing the Act on Digital Information Services for the Transport System, which entered into force at the beginning of 2026. We released the [Traffic Data Catalogue](#) and expanded our data services to compile and distribute data on EV charging stations.

For logistics, we drove the production readiness of the EU Electronic Freight Transport Information (eFTI) system and its regulation.

OUR STRATEGIC OBJECTIVES



Fintraffic is Finland’s most significant and most popular compiler and provider of traffic data. We are building the digital twin for traffic piece by piece.



Fintraffic accelerates exports in the sector.



Fintraffic’s services have a significant public impact.



Fintraffic accelerates cooperation in the sector. Traffic sector operators trust Fintraffic and are comfortable building their business on the basis of Fintraffic’s data services.



WHAT PROGRESS DID WE MAKE IN OUR GOALS IN 2025?

The Act on Digital Information Services in the Transport System entered into force on 1 January 2026. In 2025, we took part in the drafting of the Act and prepared the related action plan. In addition, we applied for government funding and communicated about the legislative reform to stakeholders. The Act underlines Fintraffic’s role as a traffic data provider.

Cooperation with parties in the transport sector remained active. In terms of travel data, we initiated the harmonisation of bus stop data. International cooperation was also increased, especially in the development of travel chains. We laid the ground for building international travel chain services which integrate booking and payment in one solution.

The value of leads in the export cluster was EUR 20–30 million. A total of EUR 13 million in trade was attributed to the cluster.

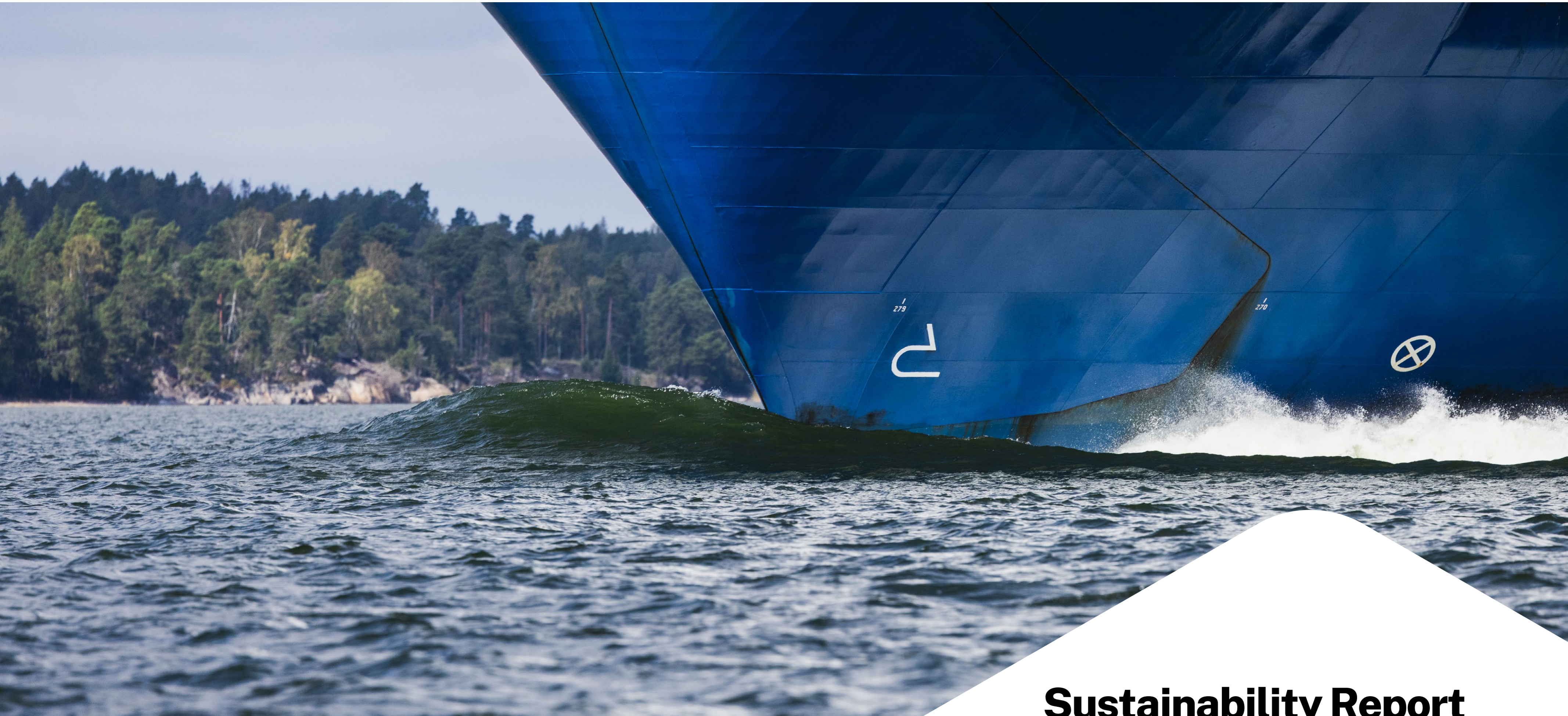
Perceived meaningfulness increased, as demonstrated by the near-fifty per cent increase in the use of digital services. In addition, as older vehicles are replaced, an increasing percentage of cars have access to traffic data integrated into their satellite navigation system. Over 20 billion traffic data searches were made at Fintraffic’s open data interfaces.

The Ministry of Economic Affairs and Employment named our ecosystem work a prime example of driving the data economy. For example, an airport operational status solution was developed in anticipation of future regulation in airport environments. This was a joint effort between Fintraffic, Finavia, Siili, the Finnish Meteorological Institute and Vaisala. The solution improves the flow, predictability and capacity of air traffic and it has been exported through the Traffic Data Service Cluster as well.

Actors within the Traffic Data Ecosystem reported satisfaction in cooperation. Meaningfulness was rated at 3.88 and inspiration as 3.85. The aim of the ecosystem work is to create new operating models for the transport sector, improve operational efficiency through sharing and utilising data, save costs through co-development, and reduce traffic emissions.

The Fintraffic-coordinated export cluster was successful in promoting exports by Finnish companies. **Cluster members report receiving tangible assistance in gaining new opportunities.** Export delegations visited Croatia, Greece and other nations in several carefully planned assignments.





Sustainability Report



ESRS 2 General information

General basis for preparation of the sustainability report (BP-1)

Basic information

Together, Traffic Management Company Fintraffic Ltd and its subsidiaries form the Fintraffic Group. The Group consists of the parent company (Traffic Management Company Fintraffic Ltd) and its wholly owned subsidiaries Fintraffic Air Navigation Services Ltd, Fintraffic Vessel Traffic Services Ltd, Fintraffic Railway Ltd and Fintraffic Road Ltd.

The business areas include air navigation services, vessel traffic services, rail traffic management, road traffic management and digital ecosystem services.

The scope of sustainability reporting is the same as that of financial reporting in the consolidated financial statements, i.e. the entire Fintraffic Group, including the aforementioned subsidiaries and business operations.

Basis for preparation

The reporting period corresponds to the financial year 1 January 2025 to 31 December 2025.

The sustainability report will be published as part of the annual report 2025. The report has been written in compliance with the EU Corporate Sustainability Reporting Directive (CSRD) and the complementary European Sustainability Reporting Standards (ESRS). The report is not a sustainability report as defined in the Accounting Act nor part of the Board of Directors' annual report.

The original policies detailed in the CSRD regulation mandated that Fintraffic Group report its sustainability data in stages in compliance with EU regulation. The schedule and requirements related to CSRD application have since been specified and partly postponed in connection with the so-called Omnibus legislation. Fintraffic actively monitors developments in regulation and ensures that its reporting practices comply with then-current legislation. Before 2024, Fintraffic has reported on its sustainability data using the Global Reporting Initiative (GRI) Universal Standards framework.

Fintraffic has systematically advanced towards CSRD reporting since 2024. Reporting is developed and supplemented annually as regulation, guidelines and good reporting practices are specified further. The 2025 responsibility report has not been validated.



The reported sustainability topics and sustainability indicators are based on a double materiality analysis conducted in Fintraffic in autumn 2023, which was specified by a Board of Directors decision of 30 August 2024. The updated analysis forms the basis for the report contents and guides its focus areas. For more information on the double materiality analysis and its results, see pages 59–61.

Based on the double materiality analysis, Fintraffic reports on the following sustainability themes identified as essential for the Group:

- ESRS E1 Climate change
- ESRS S1 Own workforce
- ESRS S3 Affected communities
- ESRS S4 Consumers and end-users
- ESRS G1 Business conduct

Changes in the preparation and presentation of sustainability information

The sustainability report was prepared by Fintraffic Group experts together with members of the sustainability steering group. The report has been reviewed by the Fintraffic Group Management Team and Audit Committee and reviewed by the Group Board of Directors.

Fintraffic sustainability plans in the medium and long term (BP-2)

The Fintraffic Sustainability Report was prepared in compliance with the EU Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) as well as any other applicable legislation and guidelines.

The report follows the principles required by ESRS standards concerning reporting time spans, value chain assessments, the description of uncertainties in assessments and their results, changes in the preparation or presentation of sustainability data, the handling of errors identified in previous reporting periods and other reporting obligations stemming from legislation and commonly accepted sustainability reporting practices. In addition, the reporting complies with regulations on the use and gradual phase-in of references.

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

Board of Directors

The Board of Directors consists of seven members, one of whom acts as the chair. The Board includes three women and four men. There is no employee representation in the board. Members of the Board must have a versatile experience that promotes the

company's business. All members of the Board are independent of the company.

Group Management Team

Fintraffic's Management Team consists of 10 members, and it is chaired by the company CEO. The Management Team includes four women and six men, for a 40/60 gender ratio. There is no employee representation in the Management Team. Members of the Management Team must have a versatile experience that promotes the company's business.

Committees of the Board of Directors

It is the Board of Directors' duty to ensure that the company's administration and operations are appropriately organised, and that appropriate supervision of accounting and financial management has been arranged. The Board of Directors may set up standing or ad hoc committees to deal with particular issues. The Board has appointed an Audit Committee and a Personnel and Remuneration Committee, with approved rules of procedure for these committees.

The Board of Directors' Audit Committee has four members, and the Personnel and Remuneration Committee has four members. Both committees of the Board of Directors have a 50/50 gender ratio.

Role of Administration

The Board of Directors reviews the risk assessment twice a year and sets the related objectives. In accordance with the sustainability policy, sustainability has been integrated into Fintraffic's strategy and business operations. We update the material impacts, risks and opportunities of our business operations annually. Specific control measures and procedures defined in the risk management policy and the internal audit guidelines are used to manage impacts, risks and opportunities. We actively develop competence related to sustainability at different levels of the organisation.

Our responsibility is divided into the responsibility for the environment (E), responsibility for people and communities (S) and responsibility for good governance (G). The objectives, measures and metrics related to these themes and responsibilities for the management of corporate responsibility are described in Fintraffic's Sustainability Programme document.

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies (GOV-2)

Fintraffic's administrative, management and supervisory bodies regularly discuss the progress of the



goals recorded in the sustainability programme. The sustainability programme includes environmental responsibility, social corporate responsibility and the principles, targets, measures, resources and metrics of good governance. Progress on the responsibility programme is monitored in the short, medium and long term as part of the implementation of Fintraffic strategy and operational planning.

By following the practices described below, Fintraffic ensures that the administrative, management and supervisory bodies receive up-to-date and comprehensive information on the sustainability-related material impacts, risks and opportunities of the company:

- Fintraffic's administrative, management and supervisory bodies receive regular reports on sustainability and related matters. This ensures that the members of the bodies are adequately informed and able to carry out their tasks effectively.
- The double materiality analysis results are reported to the Board of Directors annually. In its meetings, the Board also regularly discusses the reviews of different aspects of sustainability presented by the Group's management and experts.
- The Fintraffic sustainability report describes how the administrative, management and supervisory

bodies take into account different impacts, risks and opportunities when supervising the company strategy, decisions on major business transactions and the risk management process. The report also provides information on material impacts, risks and opportunities that the administrative, management and supervisory bodies have addressed during the reporting period.

Fintraffic's sustainability programme describes the following practices that Fintraffic uses to ensure that the administrative, management and supervisory bodies receive up-to-date and comprehensive information on the material impacts, risks and opportunities, the implementation of the due diligence processes and the results and effectiveness of the policies, actions, indicators and objectives intended to address them:

Fintraffic's employees

- Ensure compliance with the policies concerning sustainability when performing their tasks.

Business areas and support services

- Ensure the implementation of the policies laid down in the strategy and the sustainability programme in their own action plans and activities.
- Participate in the preparation of strategic policies and the sustainability programme.

Sustainability group

- Acts as the steering group for the Group's sustainability action, which develops and coordinates sustainability action at Fintraffic.
- Prepares a Group-level sustainability programme, including its targets and objectives, and a sustainability policy.
- Prepares an annual plan and coordinates the annual update of the double materiality assessment.
- Ensures the preparation of the sustainability report and communicates about sustainability to stakeholders.
- Promotes the strengthening of sustainability competence in the organisation.

Group Management Team

- Ensures the integration of sustainability policies into the strategy and business operations and the implementation of sustainability measures.

Audit Committee

- Monitors and evaluates regularly the development of the strategy and the sustainability programme. Assists the Board of Directors in managing and supervising sustainability issues.
- Reports to the Board on the integrity, process and verification of sustainability reporting.
- Monitors the verification processes of sustainability reporting, assesses the appropriateness of

Fintraffic's controls and informs the Board of Directors of the results of the verification.

Fintraffic Board of Directors

- Approves the Group's strategy, sustainability policy and sustainability programme with its long-term objectives.
- Approves the double materiality assessment and the public sustainability report.
- Monitors the implementation of sustainability policies. The Board ensures that the sustainability report complies with regulations.
- The Board of Directors is responsible for selecting of the certification body.

Sustainability is at the core of Fintraffic business operations. The Sustainability Programme is considered in strategy and operational planning. This ensures that the sustainability targets are linked to Fintraffic strategy. The Sustainability Programme helps to ensure that the Fintraffic operations are sustainable.

The Fintraffic double materiality analysis final report was updated in November 2025. It contains a comprehensive list of material impacts, risks and opportunities.



Fintraffic’s material sustainability topics

Thematic ESRS standard	Relevant ESRS sustainability considerations	Relevance to Fintraffic operations
ESRS E1 Climate change	Climate change mitigation	<ul style="list-style-type: none"> Reducing greenhouse gas emissions from traffic, promoting multimodal travel and transport chains and low-carbon transport from the perspective of new business opportunities, and emission reductions. Greenhouse gas emissions from everyday operations. Travel, procurement and fuel consumption.
	Climate change adaptation	<ul style="list-style-type: none"> Extreme weather events may damage traffic control infrastructure, weakening the ability of Fintraffic to provide traffic management services and endangering traffic safety and smooth flow of traffic.
ESRS S1 Own workforce	Working conditions: Health, safety and wellbeing, social dialogue	<ul style="list-style-type: none"> Promoting the health, safety and wellbeing of employees. Prevention of exhaustion and stress caused by workload in particular.
	Equal treatment and equal opportunities for all, other rights	<ul style="list-style-type: none"> Competence development and availability of skilled labour. Impacts of industrial action on service level. Promoting an equal and inclusive work community and its impact on employer image and ability to recruit. Employee comfort (including data security).
ESRS S3 Affected communities	Economic, social and cultural rights of communities	<ul style="list-style-type: none"> The impacts of Fintraffic services on the comprehensive security of society (including cyber security). Regional and international accessibility and the facilitation of logistics. The social benefits of traffic automation and digitalisation.
ESRS S4 Consumers and end-users	Personal safety and social inclusion of consumers and/or end-users	<ul style="list-style-type: none"> Promoting the safety of traffic users. Improving the accessibility and attractiveness of public transport. Developing the data centredness of traffic and, consequently, Fintraffic’s attractiveness as a partner.
ESRS G1 Business conduct	Ethical conduct of business and good governance	<ul style="list-style-type: none"> Responsible, sustainable and cost-effective budgeting. Good governance, anti-corruption and anti-bribery measures.

Integration of sustainability-related performance in incentive schemes (GOV-3)

Fintraffic has an incentive scheme in place that covers all Fintraffic employees who have an employment or CEO agreement with the company and meet certain previous employment requirements.

Fintraffic adheres to the management remuneration policy approved by the company’s Board of Directors and the recommendations of state ownership steering, such as the Government’s decision-in-principle on ownership policy for 2024 and, where applicable, the Corporate Governance Code 2020.

The Board of Directors decides, on a proposal from the Personnel and Remuneration Committee, on the payment of incentive bonuses to the CEO and the members of the Management Team reporting directly to the CEO.

The Board decides annually on the comprehensive remuneration policy for employees, which includes the terms and conditions of the incentive scheme.



Remuneration for personnel as a whole seeks to:

1. attract skilled and motivated employees to the Group;
2. engage personnel and commit them to both the Group and its objectives;
3. motivate personnel to achieve the targets defined by their employer.

All company personnel are covered by a short-term (annual) performance incentive scheme. In this context, “performance” broadly refers to achieving the various company objectives in terms of safety, business continuity, operational efficiency, corporate responsibility and financial performance.

In accordance with the State’s ownership steering policy, state-owned companies must be able to recruit and engage management and other personnel by means of competitive terms and conditions.

Remuneration should be moderate and appropriate. Performance bonuses may be cancelled, deferred or lowered as necessary by a unanimous decision of the Board of Directors.

Sustainability has been considered in target setting and the performance incentive scheme. The sustainability targets determine 60–70% (average 68%) of the 2025 incentive payments for senior management. For example, the CEO and all members of the Group Executive Management had a numerical target for social responsibility, specifically non-

discrimination. For other employees, the number of sustainability targets varied depending on their position and employee group, but sustainability targets were a significant factor for all staff eligible for performance bonuses.

The amount of the incentive bonus for the Fintraffic Group CEO and the Management Team at the target level is 15 per cent of annual earnings. For exceptional performance, this may be 30 per cent of annual earnings. The corresponding percentages for the members of the subsidiaries’ management teams are 10 and 20 per cent and for supervisors and experts 5 and 10 per cent. Other employees are covered by a bonus scheme based on common objectives, i.e. no personal targets are set for them. Typically, such professional groups include traffic controllers and other employees engaged in operational work.

The Group CEO, together with each subsidiary’s CEO, sets the annual common objectives for the subsidiary. The objectives are approved by each company’s board of directors. The objectives being measured are related to the company’s financial, operational and safety targets as well as effectiveness and sustainability. The performance bonus is capped at 2 per cent of the total annual salary of the employees under the Fintraffic remuneration scheme for the given year.

Statement on due diligence (GOV-4)

Fintraffic provides data on the due diligence process under various sections of the report.

Risk management and internal controls over sustainability reporting (GOV-5)

The requirements, roles and responsibilities of risk management are defined in the Fintraffic Group Risk Management Policy. When necessary, the Policy is complemented by company-specific operating models and procedures in compliance with the applicable standards, guidelines and requirements. The reporting obligations of the Board of Directors and the Management Group are described in the Corporate Governance model and the supplementary operating manuals and process descriptions, including descriptions of internal control and the control system. Sustainability-related risks are part of normal risk management, risk management and control within the Group.

In 2025, sustainability risks were integrated into comprehensive risk management at Fintraffic, and their scope covers the entire Group and all of its business operations. As part of the risk management process, operating environment-related sustainability risks and their changes are systematically identified, assessed and monitored at least twice a year.

Risk reports are regularly submitted to the Fintraffic Management Group, Audit Committee and Board of Directors as part of the Group’s strategic and operational monitoring. The business operations groups compile key risk registers from their own risk registers for input in Group-level risk management. The Group’s joint services and business operations define measures that target identified risks and opportunities, their implementation methods, and the monitoring and assessment these measures.

Risk assessment is conducted according to a uniform process by business, service and function. Risk management resources can be allocated to the most significant risks through risk identification and assessment. The most and potentially critical risks are reported twice a year to the Fintraffic Management Team, the Board of Directors’ Audit Committee and the Board of Directors.

In 2025, no responsibility risks were included on the key risk map maintained by the Group. The most significant sustainability risks are reported separately as part of the Group’s sustainability reporting to the Board of Directors and the Management Group, ensuring strategy-level visibility and risk monitoring.



Topical ESRS standard	Sustainability issue	Includes sub-sub-topics	Brief description of IRO	Detailed description of IRO	Type	Topical ESRS standard	Actual/potential impact or financial impact	Estimated potential time span for implementation <small>(Short = fiscal year) (Medium = end of fiscal year – five years) (Long = more than five years)</small>
ESRS E1 Climate change	Climate change mitigation	N/A	GHG emissions throughout the value chain	Fintraffic’s most significant direct GHG emissions are caused by energy consumption (purchased energy and heat), business travel and employee commuting. Emissions are also generated from fuel consumption and procurement of own equipment (ICT, construction, repair and maintenance services; electricity and gas).	Negative impact	Downstream	Actual	All
ESRS E1 Climate change	Climate change adaptation	N/A	Impacts of incidents caused by extreme weather events on people, companies and society	Extreme weather events, such as storms, floods and rainfall, may cause damage to traffic control buildings or equipment, affecting Fintraffic’s ability to provide traffic control services. Interruptions, regulation or restrictions on energy supply may also affect service capacity due to disruptions with impacts on the safety and smooth running of traffic.	Negative impact	Own actions	Potential	Medium-Long
ESRS E1 Climate change	Climate change mitigation	N/A	Business opportunities offered by promoting multimodal travel and transport chains	Fintraffic’s services streamline travel and transport chains, thus promoting multimodal transport and the development of new services. Successful facilitation of multimodal traffic may provide Fintraffic with business opportunities.	Opportunity	Own actions	Potential	Medium-Long
ESRS E1 Climate change	Climate change mitigation	N/A	Business opportunities afforded by low-carbon traffic	Low-carbon traffic also changes the traffic ecosystem (e.g. the impacts of charging times on land and maritime transport, novel needs to guide and organise traffic, need for new kinds of data). Delivering the change successfully may make Fintraffic more attractive to its partners.	Opportunity	Own actions	Potential	Long
ESRS E1 Climate change	Climate change mitigation	N/A	Reducing traffic emissions	Up-to-date traffic data and traffic control services provided by Fintraffic increase traffic efficiency by reducing fuel consumption and thus also emissions (e.g., air route efficiency, NEMO and other benefits of digitalisation). In addition, new information management solutions improve the management of disruptions and congestion, which reduces emissions.	Positive impact	Downstream	Actual	All



Topical ESRS standard	Sustainability issue	Includes sub-sub-topics	Brief description of IRO	Detailed description of IRO	Type	Topical ESRS standard	Actual/potential impact or financial impact	Estimated potential time span for implementation <small>(Short = fiscal year) (Medium = end of fiscal year – five years) (Long = more than five years)</small>
ESRS S1 Own workforce	Equal treatment and equal opportunities for all	Training and skills development	Risks caused by workers' skills gaps	Lack of employees' competence and experience can lead to not only decreased job satisfaction but also increase in various safety risks.	Risk	Own actions	Potential	Medium-Long
ESRS S1 Own workforce	Equal treatment and equal opportunities for all	Training and skills development	Positive impacts of competence development	With digitalisation, the competence needs of working life are changing, and the development of employees' competence has a positive impact on the person's career development and work motivation.	Positive impact	Own actions	Potential	Medium-Long
ESRS S1 Own workforce	Equal treatment and equal opportunities for all	"Gender equality and equal pay for work of equal value, Diversity"	An equal work community	An equal work community that takes into account inclusion fair opportunities for advancement and adequate compensation promote the wellbeing and motivation of employees.	Positive impact	Own actions	Actual	All
ESRS S1 Own workforce	Equal treatment and equal opportunities for all		Data security breaches against employees	Due to the nature of its operations, Fintraffic may be particularly vulnerable to information and cybersecurity threats, which is why the employees' personal data may also be exposed to potential data leaks.	Negative impact	Own actions	Potential	Medium-Long
ESRS S1 Own workforce	Working conditions	Secure employment, Working time, Adequate wages, Social dialogue, Freedom of association, the existence of works councils and the information, consultation and participation rights of workers, Collective bargaining, including rate of workers covered by collective agreements, Work-life balance, Health and safety	Strong and attractive employer image	Fair working conditions and terms of employment, investments in occupational health and wellbeing, and a positive employer image related to the diversity and inclusion of the work community promote the recruitment and retention of future experts.	Opportunity	Own actions	Potential	Medium-Long
ESRS S1 Own workforce	Working conditions	Social dialogue, Freedom of association, Collective bargaining, including rate of workers covered by collective agreements	Industrial action	Fintraffic's operations depend on the work input of competent personnel. Due to a strike or other industrial action, the activities may stop completely, causing a decrease in the service level and even loss of income.	Risk	Own actions	Potential	Medium-Long



Topical ESRS standard	Sustainability issue	Includes sub-sub-topics	Brief description of IRO	Detailed description of IRO	Type	Topical ESRS standard	Actual/potential impact or financial impact	Estimated potential time span for implementation <small>(Short = fiscal year) (Medium = end of fiscal year – five years) (Long = more than five years)</small>
ESRS S1 Own workforce	Working conditions	Secure employment, Working time, Adequate wages, Social dialogue, Freedom of association, the existence of works councils and the information, consultation and participation rights of workers, Collective bargaining, including rate of workers covered by collective agreements, Work-life balance, Health and safety	Availability of skilled labour	Engaging key persons and recruiting the necessary capabilities is critical for Fintraffic's operations. Possible negative impacts on terms of employment or working conditions may cause reputational damage, which makes recruitment and thus the company's operations more difficult.	Risk	Own actions	Potential	Medium-Long
ESRS S1 Own workforce	Working conditions	Health and safety	Promotion of worker health and welfare	Different health-promoting services, such as occupational health care and advisory services, and the development of occupational safety.	Positive impact	Own actions	Actual	All
ESRS S1 Own workforce	Working conditions	Health and safety	Negative impacts related to occupational safety and health	Occupational accidents and various work-related health problems, such as exhaustion and stress caused by working conditions (e.g. shift and night work) and workload, can have a negative impact on both the employee's physical and mental health.	Negative impact	Own actions	Potential	Medium-Long
ESRS S3 Affected communities	Financial rights of communities (own)	Appropriate housing conditions	Cost savings brought by automation and digitalisation to Fintraffic	Increasing the automation of Fintraffic's traffic control and management services and utilising digitalisation minimises risks and streamlines and enhances operations, bringing cost savings.	Opportunity	Downstream	Potential	Medium-Long
ESRS S3 Affected communities	Security-related impacts	Security-related impacts	Information and cybersecurity risks Fintraffic is exposed to	Due to the geopolitical situation and Finland's NATO membership, the threat of cyberattacks against Fintraffic and other disruptions has become emphasised. Attacks can cause significant financial damage and operational harm.	Risk	Downstream	Potential	Medium-Long
ESRS S3 Affected communities	Security-related impacts	Security-related impacts	Positive impacts on the comprehensive security of society	In accordance with its basic assignment, Fintraffic is responsible for providing traffic control services that are critical for the functioning of society. In addition, Fintraffic participates in maintaining national security through cooperation between defence and security authorities and is a key actor in Finland's security of supply.	Positive impact	Downstream	Actual	All



Topical ESRS standard	Sustainability issue	Includes sub-sub-topics	Brief description of IRO	Detailed description of IRO	Type	Topical ESRS standard	Actual/potential impact or financial impact	Estimated potential time span for implementation <small>(Short = fiscal year) (Medium = end of fiscal year – five years) (Long = more than five years)</small>
ESRS S3 Affected communities	Security-related impacts	Security-related impacts	Decreased road safety	If the service level of traffic control has significantly deteriorated or its reliability has become threatened.	Negative impact	Downstream	Potential	Medium-Long
ESRS S3 Affected communities	Financial rights of communities (own)	Appropriate housing conditions	The benefits of traffic automation and digitalisation for society	Increasing the automation and digitalisation of Fintraffic's traffic control and management services streamlines and enhances travel chains, bringing cost savings to society.	Positive impact	Downstream	Potential	Medium-Long
ESRS S3 Affected communities	Security-related impacts	Security-related impacts	Promoting regional and international accessibility and smooth logistics	Fintraffic's services improve the accessibility of Finland and its different regions, for example, by creating preconditions for connecting regional centres. Real-time information at the traffic system level streamlines travel chains, enhancing logistics and strengthening the competitiveness of society.	Positive impact	Downstream	Actual	All
ESRS S4 Consumers and end-users	Access to products and services	Access to products and services	Successful development of the data ecosystem	The successful development of Fintraffic's traffic data ecosystem may improve Fintraffic's recognition as a partner and create new business opportunities for Fintraffic.	Opportunity	Downstream	Potential	Medium-Long
ESRS S4 Consumers and end-users	Access to products and services	Access to products and services	Enabling new public transport services	Fintraffic's traffic data ecosystem enables the creation of new public transport services for consumers to use.	Positive impact	Downstream	Actual	All
ESRS S4 Consumers and end-users	Access to products and services	Access to products and services	Increasing the attractiveness of public transport	Fintraffic's services improve the flow of public transport (reliability, time spent), thus increasing its attractiveness.	Positive impact	Downstream	Actual	All
ESRS S4 Consumers and end-users	Non-discrimination	Non-discrimination	Improving the accessibility of traffic	The Fintraffic services can be used to provide accessibility information to persons with reduced mobility. In addition, designing services, websites and mobile applications so that they are more accessible, especially to persons with disabilities.	Positive impact	Downstream	Actual	All
ESRS S4 Consumers and end-users	Personal safety of consumers and/or end-users	Health and safety	Improving the safety of transport users	Fintraffic's services improve traffic safety on land, at sea and in the air, reducing accidents and preventing hazardous and threatening situations.	Positive impact	Downstream	Actual	All
ESRS G1 Business conduct	Corruption and bribery	Prevention and detection, including training	Responsible, sustainable and cost-effective use of tax revenue	Through Fintraffic's services, tax revenue is directed towards promoting goals that are important for sustainable development. This benefits people, the environment and society at large.	Positive impact	Own actions	Potential	Medium-Long



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

Fintraffic's aim is for Finland to have the world's safest, smoothest-running and most environmentally friendly traffic system. Responsibly produced services and close cooperation with transport sector operators will accelerate Finland towards the forefront of sustainable and efficient traffics. This is important with a view to reducing transport emissions and risks and minimising transport costs. The benefits generated for society and customer and employee satisfaction are at the core of our strategy. Fintraffic's services and open data have an extensive impact on the functionality and safety of the traffic system, the accessibility of Finland and its different regions, the daily lives of households, the operations of companies, and the Finnish society as a whole.

Together with our partners, we aim to support the transport system generate benefits for society in areas such as:

1. safe, smooth and environmentally friendly traffic
2. preparedness and reliable transport services
3. cost-effective traffic
4. smooth cooperation between traffic sector operators
5. the growing traffic data economy, market and export.

The strategy approved by Fintraffic's Board of Directors (detailed in our annual report p. 15) on 29 September 2025 is based on Fintraffic ownership strategy adopted by the Government on 16 October 2019. It defines Fintraffic's duties as follows:

1. to provide and develop the traffic control and management services required by society, businesses and the authorities
2. to provide and develop traffic control and management services for the requirements of defence and security authorities
3. to collect and utilise data related to traffic management and provide it equally to other operators; and to create opportunities for new business based on automation and the broader use of both data and new business models.

The revenue from traffic control services and digital ecosystem services provided by Fintraffic mainly consists of road, rail and maritime traffic control provided to the Finnish Transport Infrastructure Agency, and air navigation services provided to airlines and airports. The Group also provides services to other parties, such as Traficom, cities and ports, and international customers. The business operations as well as their services and revenue figures are presented on page 9 of the annual report.

No significant changes were made to Fintraffic service packages in 2025.

Fintraffic has divided its customers into segments (presented in the annual report p. 16) and continuously develops its customer relationship management model. There were no significant changes in customer relationships in 2025.

All Fintraffic employees work in Finland. More detailed information on personnel-related matters is provided in section S1 of the report. So far, the distribution of total revenues by major ESRS sectors has not been defined. Fintraffic monitors the development of the regulation and reports on it as the regulation is specified further.

In 2025, Fintraffic implemented its strategy in three strategic programmes: development of traffic management, productised digital ecosystem services and uniform operating methods. Page 58 describes how strategic programmes are linked to the Group's strategic objectives. The figure also shows the key contents of the programmes. Through the measures included in the strategic programmes, Fintraffic is essentially implementing the targets set in the sustainability programme. The sustainability programme describes the measures, indicators and required resources related to each target. Measures related to each area of sustainability are described separately in sections E, S and G.

Interests and views of stakeholders (SBM-2)

(a) Stakeholder engagement:

i. The undertaking's key stakeholders

Fintraffic's strategic customers and partners are: the Finnish Transport Infrastructure Agency, Finavia, airlines, Traficom, and ports and cities. Customer groups and the services provided for them are presented in the Strategy section on page 16.

Other key partners include the Finnish Defence Forces, the Finnish Border Guard, Customs and the Police, ELY Centres, and transport sector operators.

ii. Stakeholder engagement:

Fintraffic's strategy is updated annually. Inputs in the annual strategy maintenance include the ownership strategy (Government, 19 October 2019), the Resolution on State-ownership Policy, the group strategy for the Ministry of Transport and Communications' administrative branch, changes in the operating environment, such as the development of legislation, and the strategies of key customers, such as the Finnish Transport Infrastructure Agency and Finavia, and the expectations of other stakeholders.

Fintraffic actively participates in public debate on themes related to the traffic sector operating environment. Fintraffic believes it is important for decision-making to consider perspectives relating to traffic management and raising the degree of digitali-



Fintraffic tasks and business

FINTRAFFIC TASKS ¹⁾

Provision and development of **traffic control and management services** for society, businesses & the authorities

Creating cooperation networks and driving the development of **internationally competitive business ecosystems** for the traffic sector

Accelerating the **development of commercial products and services** for the sector and as well as **export-driven growth**

Creating new **platform solutions** that distribute and utilise traffic data more extensively and promoting new **data-based service business and value creation**

FINTRAFFIC BUSINESS

Traffic control & management services

- Air Navigation Services
- Rail Traffic Control & Management
- Road Traffic Control & Management
- Vessel Navigation Services & Control

Digital end-user services (digital services)

- Traffic situational picture
- Public transport & logistics data services
- E-services for various customer groups

Export cluster

Traffic data collection & distribution

- Data collection, processing and & distribution
- Driving data crowdsourcing
- Development of a digital twin

BUSINESS DEVELOPMENT & IMPACT

Further development of traffic control tools and operating models

- Safe, smooth and environmentally friendly traffic
- Reliability and preparedness
- Cost-effectiveness

Driving sector cooperation

- Evolution towards open architecture and facilitating data collection, processing and use
- Accelerating service development and innovation
- Effective and efficient travel and transport
- Joint market growth

Provision of world-class traffic data and situational picture in Finland, driving the use of digital services

- Third-party businesses based on Fintraffic data and digital services, accelerating business development
- Improved transport and travel services

¹⁾ Fintraffic's ownership strategy 16 October 2019



Fintraffic's strategic programmes 2026–2030

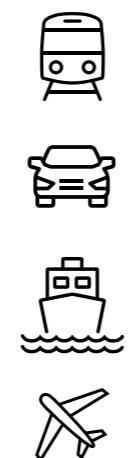
STRATEGIC OBJECTIVES

- SAFE, SMOOTH AND ENVIRONMENTALLY FRIENDLY TRAFFIC
- RELIABILITY AND PREPAREDNESS
- COST-EFFECTIVENESS

TRAFFIC CONTROL DEVELOPMENT

BENEFICIARIES
Infrastructure owners, end users & maintainers; special requirements of defense & security authorities.

KEY ACTIONS
Renewing traffic control tools and processes; leveraging cutting-edge technology and increasing automation; equipment and system lifecycle management; further improving preparedness and operational efficiency; development of our knowledge base and its use. All of these aim for the continuous improvement of traffic safety.




STRATEGIC OBJECTIVES

- GROWING TRAFFIC DATA ECONOMY, MARKET AND EXPORT
- SAFE, SMOOTH AND ENVIRONMENTALLY FRIENDLY TRAFFIC
- SMOOTH COOPERATION BETWEEN TRAFFIC SECTOR OPERATORS

DATA-DRIVEN TRANSPORT SYSTEM DEVELOPMENT

BENEFICIARIES
Provision of data-driven services for ecosystem operators, including businesses, communities, public agencies, app developers and passengers.

KEY ACTIONS
We aim to be the cornerstone in both statutory and commercial transport data in Finland. We strive for a significant role in creating a digital twin for traffic.
We drive cooperation within the sector and success factors as well as market growth.



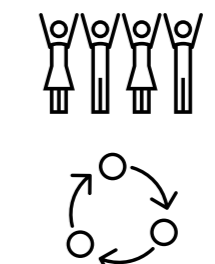
STRATEGIC OBJECTIVES

- GROWING TRAFFIC DATA ECONOMY, MARKET AND EXPORT
- HEALTHY AND WELL-BEING STAFF, A LEARNING WORK COMMUNITY AND A WINNING CORPORATE CULTURE
- HIGH-QUALITY MANAGEMENT

ENABLING THE FUTURE

BENEFICIARIES
We develop internally shared capabilities for our commercial teams to respond to business and strategic objectives.

KEY ACTIONS
Our strong corporate culture and shared values drive us towards our objectives and support our staff in their well-being and learning. We ensure a conscious and systematic approach to technology development as well as the creation and leveraging of a digital twin.



OUR OPERATIONS ARE DRIVEN BY VALUES, SOCIAL IMPACT, RESPONSIBILITY AND CUSTOMER SATISFACTION



sation in the traffic sector to ensure the best possible implementation of a safe, smooth and low-emission transport system in Finland.

Cooperation has been intensified, especially with actors in the traffic data ecosystem. The data ecosystem consists of more than 200 companies and organisations with whom we promote a fair data economy and a common set of rules for the sector. In the data ecosystem, Fintraffic acts as a coordinator and convener.

Issues concerning the stakeholders' own workforce are discussed in section S1 (page 91).

iii. How engagement is organised:

Fintraffic has established operating models for key customers (Finnish Transport Infrastructure Agency, Traficom, Finavia). Annual consultation and discussion meetings with key aviation operators are one method of engagement. There is no established operating model for other end-user customers (especially consumers).

iv. Purpose of engagement:

Stakeholder engagement is coordinated both at the Group level and by mode of transport. Transport modes have their own teams responsible for managing stakeholder relations. Continuous dialogue, building common practices and enhanced

cooperation with our partners are important components of our cooperation with stakeholders.

We have persons responsible assigned for our key stakeholders in the Group Management Team. In addition to keeping in regular contact with our stakeholders, we request them to provide feedback on our activities. In 2025, targeted stakeholder and customer satisfaction surveys were conducted, and Fintraffic's third corporate image survey was carried out among the general public. Both the stakeholder surveys and aforementioned reputation survey indicated increased confidence in Fintraffic and a greater awareness of the company.

(b) The views and benefits of key stakeholders in relation to the company's strategy and business model:

Fintraffic takes the views of stakeholders into account through the double materiality assessment processes.

As part of the double materiality process, in 2024 we interviewed key stakeholders to better understand their perspective. The views focused on issues such as transport safety from various perspectives, the promotion of low emissions from traffic and accessibility of transport, the benefits of the data ecosystem facilitated by Fintraffic, and the health and wellbeing of the employees.

The feedback received from stakeholders is systematically taken into account in decision-making,

especially in environmental impact assessments and the development of Fintraffic's digital and green services.

(c) Changes in strategy and/or business model:

i. Changes due to stakeholder views:

Fintraffic is increasing digitalisation in all modes of transport (e.g. the remote air traffic control project) and through responding to Finland's national and international climate targets in terms of sustainability requirements.

ii. Planned follow-up measures and their schedule:

Fintraffic will continue to develop digital services and traffic management tools to reduce emissions, maintain safety and improve traffic flow. Actions are to be implemented in stages over the next few years, in line with national and EU-level sustainability targets.

iii. Impacts of changes on stakeholder relations:

Strategic policies strengthen relations with key stakeholders, as Fintraffic's services respond better to environmental and efficiency requirements.

(d) Informing the administrative, management and supervisory bodies:

The feedback received from stakeholders is regularly reported to Fintraffic management, the Board of Directors and the owner.

Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

The materiality analysis highlighted the societal impact of Fintraffic, i.e., the benefits generated for the transport ecosystem and users. In environmental issues, the focus is on topics related to emissions and the prevention of environmental damage. The focus of financial accountability is on sustainable use of tax revenue and good governance. The sustainability themes related to workforce are still strongly represented. Fintraffic has recognised that traffic control infrastructure may have negative impacts on biodiversity. However, it should be noted that the double materiality analysis has not identified that our premises, which are mainly located in the Helsinki Metropolitan Area, would have material negative impacts on biodiversity based on their location.

Fintraffic has identified a risk related to human rights violations in the value chain. The risk includes reputational risks and negative impacts on working conditions and equality. However, it is important to note that, as a result of the double materiality analysis, this risk and the negative impact have not become material. Despite this, it is important for us to actively monitor risks and opportunities. We are committed to continuously developing our practices and reacting quickly to any changes.



SBM-3 is discussed in the table where impacts, risks and opportunities are linked to the business model and strategy.

Description of processes to identify and assess material impacts, risks and opportunities (IRO-1)

Fintraffic's process for identifying and assessing material sustainability impacts, risks and opportunities was first conducted in 2023 in accordance with the principles of double materiality. The evaluation leveraged research based on public and internal materials, stakeholder interviews, personnel surveys and a materiality assessment conducted by Fintraffic experts and management. In addition, the process was supported by working group meetings, ensuring a diverse view and comprehensive analysis.

Most of the Group Management Team members participated in the materiality assessment process, and the entire management team validated its results. The materiality assessment was reviewed by the Audit Committee meeting on 28 November 2023 and confirmed by the Board on 5 February 2024. This process ensures that the assessment supports Fintraffic's strategic decisions and prioritisation of sustainability targets.

In 2024, Fintraffic experts updated the framework for the impacts, risks and opportunities (IRO) of the double materiality analysis using the data points set

by the European Financial Reporting Advisory Group (EFRAG).

The analysis was updated again in 2025 and its final results were validated at the Fintraffic Sustainability Group meeting on 11 September 2025, the Group Executive Committee on 24 September 2025 and the Audit Committee meeting on 30 October 2025. Fintraffic's Board of Directors verified the analysis results on 7 November 2025.

Understanding the context: background analysis and consultation with stakeholder

The background analysis focused on Fintraffic's internal materials, such as the previously conducted materiality analysis, strategy and risk management materials and other studies, such as studies on Fintraffic's impact. In addition, such matters as EU legislation concerning Fintraffic, expectations related to ownership steering and reference actors were examined from the sustainability perspective. The background analysis also examined the earlier stakeholder surveys conducted by Fintraffic and the issues that emerged in them. Based on the background analysis, Fintraffic's most important sustainability topics were related to consumers and end-users, climate change mitigation, pollution, Fintraffic staff and business conduct.

The views of Fintraffic's various stakeholders were also examined as part of the process by

conducting interviews with key stakeholders and a survey for Fintraffic's employees. The stakeholder views focused on such issues as traffic safety-related matters from various perspectives, the promotion of low emissions from traffic and accessibility of transport, the benefits of the data ecosystem facilitated by Fintraffic, and the health and wellbeing of the employees.

Identifying the sustainability-related impacts, risks and opportunities

The background analysis identified a number of negative and positive impacts on people and the environment, to which Fintraffic potentially or actually affects through its own activities or business relationships (e.g. suppliers, customers or other parties in the traffic ecosystem), as well as sustainability-related risks and opportunities. Impacts, risks and opportunities were defined according to sustainability issues listed in European sustainability reporting standards (ESRS 1, AR 16.).

The impacts, risks and opportunities were identified at a general level, however taking account of the special features of Fintraffic's different modes of transport. The identification did not provide a more in-depth analysis of individual activities, business relationships or geographical areas. Many of the identified impacts were found to be linked to financial risks, such as increased costs or reputational damage.

For example, dependencies related to personnel and their links to potential risks were also identified, relating to, for example, employee competence, health and wellbeing.

Assessment and materiality assessment of identified impacts, risks and opportunities

The materiality of the identified impacts, risks and opportunities was assessed in accordance with the principles laid out in the standards (ESRS 1, chapter 3). The severity of the negative and positive impacts (the scale, scope and irremediable character of the impact), the magnitude of the anticipated financial effects of the risks and opportunities and the likelihood of the materialisation of each impact were assessed on a scale of 1 to 4 in an internal assessment carried out by Fintraffic experts and management. The assessment of sustainability risks and opportunities related to the materiality analysis was carried out at Fintraffic as a separate process from the company-level risk assessment, but using the same assessment scale.

The materiality value of the impacts was formed from the averages of the severity and likelihood scores given by each participant in the assessment. In the same way, the materiality value of the risks and opportunities was formed from the averages of the magnitude and likelihood scores of the related financial effects. The double materiality value of each



sustainability issue was determined as the average of all its assessed impacts, risks and opportunities. A calculated median of all assessed impacts, risks and opportunities was used as the quantitative threshold for materiality. Finally, the results were also assessed qualitatively. On this basis, some clarifications and limitations were made to the assessment in joint agreement.

Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)

The following tables list all ESRS 2 disclosure requirements and six standards that have been relevant to Fintraffic and guided the preparation of our sustainability report. We have excluded all reporting requirements for E2 pollution, E3 water and marine resources, E4 biodiversity and ecosystems and S2 workers in the value chain as immaterial to our operations.

Tables can be used to find information related to a specific disclosure requirement (DR) in sustainability statements. In addition, the tables show to find information on a specific disclosure requirement. The table indicates if the information is presented in another section of the annual report or if the information is available in a separate document outside the responsibility report. In cases where we do not yet

have information on the disclosure requirement, the reference is not made.

Fintraffic has defined the relevant information to be provided for the impacts, risks and opportunities it assesses as follows:

Identifying and assessing material impacts, risks and opportunities

Fintraffic carried out the process of identifying and assessing material sustainability impacts, risks and opportunities in accordance with the principles of double materiality analysis. The methods used in the process included reviews based on public and internal materials, stakeholder interviews, personnel survey, the materiality assessments of experts and management, and working group meetings.

Understanding the context

The background analysis focused on Fintraffic's internal materials, such as the previously conducted materiality analysis, strategy and risk management materials and other studies, including studies on Fintraffic's impact. In addition, such matters as EU legislation concerning Fintraffic, expectations related to ownership steering and reference actors were examined from the sustainability perspective.

Assessment of impacts, risks and opportunities / Quantitative materiality threshold

The severity of impacts, risks and opportunities, the magnitude of financial effects and the likelihood of their materialisation were assessed on a scale of 1 to 4. The materiality value was based on the averages of the assessments and the calculated median was used as the quantitative threshold. Finally, the results were also assessed qualitatively. On this basis, some clarifications and limitations were made to the assessment in joint agreement.

Double materiality analysis

The double materiality analysis is a formal method for determining which sustainability issues Fintraffic should focus on in its strategy and activities and which topics should be reported in sustainability reporting in accordance with the CSRD. The analysis resulted in a list of sustainability topics that were material for Fintraffic.

Information based on other EU legislation (Annex B):

The table below contains information based on other EU legislation, as listed in Annex B to ESRS 2. The table also indicates where the information can be found in our report and what information has been deemed "Material".



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS 2 GOV-1	Paragraph 21 (d)	Board's gender diversity	Indicator number 13 Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	48
ESRS 2 GOV-1	Paragraph 21 (e)	Percentage of board members who are independent			Delegated Regulation (EU) 2020/1816, Annex II		Material	48
ESRS 2 GOV-4	Paragraph 30	Statement on sustainability due diligence	Indicator number 10 Table #3 of Annex 1				Material	51
ESRS 2 SBM-1	Paragraph 40 (d) i	Involvement in activities related to fossil fuel activities	Indicator number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Material	
ESRS 2 SBM-1	Paragraph 40 (d) ii	Involvement in activities related to chemical production	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material	
ESRS 2 SBM-1	Paragraph 40 (d) iii	Involvement in activities related to controversial weapons paragraph	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Material	
ESRS 2 SBM-1	Paragraph 40 (d) iv	Involvement in activities related to cultivation and production of tobacco			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Material	



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS E1-1	Paragraph 14	Transition plan to reach climate neutrality by 2050				Regulation (EU) 2021/1119, Article 2(1)	Material	75
ESRS E1-1	Paragraph 16 (g)	Undertakings excluded from Paris-aligned Benchmarks		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book –Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Material	
ESRS E1-4	Paragraph 34	GHG emission reduction targets	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book –Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Material	80–83
ESRS E1-5	Paragraph 38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex 1				Non-material	
ESRS E1-5	Paragraph 37	Energy consumption and mix	Indicator number 5 Table #1 of Annex 1				Non-material	
ESRS E1-5	Paragraphs 40 to 43	Energy intensity associated with activities in high climate impact sectors	Indicator number 6 Table #1 of Annex 1				Non-material	
ESRS E1-6	Paragraph 44	Gross Scope 1, 2, 3 and Total GHG emissions	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book –Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Material	86



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS E1-6	Paragraphs 53 to 55	Gross GHG emissions intensity	Indicator number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Non-material	86
ESRS E1-7	Paragraph 56	GHG removals and carbon credits				Regulation (EU) 2021/1119, Article 2(1)	Non-material	
ESRS E1-9	Paragraph 66	Exposure of the benchmark portfolio to climate-related physical risks			Delegated Regulation (EU) 2020/1818, Annex II; Delegated Regulation (EU) 2020/1816, Annex II		Material	87
ESRS E1-9	Paragraph 66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Material	
ESRS E1-9	Paragraph 66 (c)	Location of significant assets at material physical risk					Material	87
ESRS E1-9	Paragraph 67 (c)	Breakdown of the carrying value of an undertaking's real estate assets by energy-efficiency classes		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book – Climate Change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Material	



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS E1-9	Paragraph 69	Degree of exposure of the portfolio to climate-related opportunities			Delegated Regulation (EU) 2020/1818, Annex II		Material	
ESRS E2-4	Paragraph 28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	Indicators number 1 and 3 Table #1 of Annex 1 Indicators number 1, 2 and 3 Table #2 of Annex 1				Non-material	
ESRS E3-1	Paragraph 9	Water and marine resources	Indicator number 7 Table #2 of Annex 1				Non-material	
ESRS E3-1	Paragraph 13	Dedicated policy	Indicator number 8 Table #2 of Annex 1				Non-material	
ESRS E3-1	Paragraph 14	Sustainable oceans and seas	Indicator number 12 Table #2 of Annex 1				Non-material	
ESRS E3-4	Paragraph 28 (c)	Total water recycled and reused	Indicator number 6.2 Table #2 of Annex 1				Non-material	
ESRS E3-4	Paragraph 29	Total water consumption in m3 per net revenue on own operations	Indicator number 6.1 Table #2 of Annex 1				Non-material	
ESRS 2 –IRO-1 –E4	Paragraph 16 (a) i		Indicator number 7 Table #1 of Annex 1				Non-material	
ESRS 2 –IRO-1 –E4	Paragraph 16 (b)		Indicator number 10 Table #2 of Annex 1				Non-material	
ESRS 2 –IRO-1 –E4	Paragraph 16 (c)		Indicator number 14 Table #2 of Annex 1				Non-material	
ESRS E4-2	Paragraph 24 (b)	Sustainable land / agriculture practices or policies	Indicator number 11 Table #2 of Annex 1				Non-material	



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS E4-2	Paragraph 24 (c)	Sustainable oceans / seas practices or policies	Indicator number 12 Table #2 of Annex 1				Non-material	
ESRS E4-2	Paragraph 24 (d)	Policies to address deforestation	Indicator number 15 Table #2 of Annex 1				Non-material	
ESRS E5-5	Paragraph 37 (d)	Non-recycled waste	Indicator number 13 Table #2 of Annex 1				Non-material	
ESRS E5-5	Paragraph 39	Hazardous waste and radioactive waste	Indicator number 9 Table #1 of Annex 1				Non-material	
ESRS 2-SBM-3-S1	Paragraph 14 (f)	Risk of incidents of forced labour	Indicator number 13 Table #3 of Annex 1				Non-material	
ESRS 2-SBM-3-S1	Paragraph 14 (g)	Risk of incidents of child labour	Indicator number 12 Table #3 of Annex 1				Non-material	
ESRS S1-1	Paragraph 20	Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material	94
ESRS S1-1	Paragraph 21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			Delegated Regulation (EU) 2020/1816, Annex II		Material	96-97
ESRS S1-1	Paragraph 22	Processes and measures for preventing trafficking in human beings	Indicator number 11 Table #3 of Annex 1				Non-material	95
ESRS S1-1	Paragraph 23	Workplace accident prevention policy or management system	Indicator number 1 Table #3 of Annex 1				Material	95-96
ESRS S1-3	Paragraph 32 (c)	Grievance/complaints handling mechanisms	Indicator number 5 Table #3 of Annex 1				Material	97



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS S1-14	Paragraph 88 (b)	Number of fatalities and number and rate of work-related accidents	Indicator number 2 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material	106
ESRS S1-14	Paragraph 88 (e)	Number of days lost to injuries, accidents, fatalities or illness	Indicator number 3 Table #3 of Annex 1				Material	106
ESRS S1-16	Paragraph 97 (a)	Unadjusted gender pay gap	Indicator number 12 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material	106
ESRS S1-16	Paragraph 97 (b)	Excessive CEO pay ratio	Indicator number 8 Table #3 of Annex 1				Material	51, 106
ESRS S1-17	Paragraph 103 (a)	Incidents of discrimination	Indicator number 7 Table #3 of Annex 1				Material	107
ESRS S1-17	Paragraph 104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD principles	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)		Non-material	
ESRS 2 –SBM-3 –S2	Paragraph 11 (b)	Significant risk of child labour or forced labour in the value chain	Indicators number 12 and no. 13 Table #3 of Annex 1				Non-material	
ESRS S2-1	Paragraph 17	Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Non-material	
ESRS S2-1	Paragraph 18	Policies related to value chain workers	Indicators number 11 and no. 4 Table #3 of Annex 1				Non-material	
ESRS S2-1	Paragraph 19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)		Non-material	



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS S2-1	Paragraph 19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			Delegated Regulation (EU) 2020/1816, Annex II		Non-material	
ESRS S2-4	Paragraph 36	Human rights issues and incidents connected to its upstream and downstream value chain	Indicator number 14 Table #3 of Annex 1				Non-material	
ESRS S3-1	Paragraph 16	Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material	94
ESRS S3-1	Paragraph 17	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	111
ESRS S3-4	Paragraph 36	Human rights issues and incidents	Indicator number 14 Table #3 of Annex 1				Material	111
ESRS S4-1	Paragraph 16	Policies related to consumers and end-users	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material	113-114
ESRS S4-1	Paragraph 17	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	113-114
ESRS S4-4	Paragraph 35	Human rights issues and incidents	Indicator number 14 Table #3 of Annex 1				Material	111



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/non-material	Page number
ESRS G1-1	Paragraph 10 (b)	United Nations Convention against Corruption	Indicator number 15 Table #3 of Annex 1				Material	118
ESRS G1-1	Paragraph 10 (d)	Protection of whistle-blowers	Indicator number 6 Table #3 of Annex 1				Material	111
ESRS G1-4	Paragraph 24 (a)	Fines for violation of anti-corruption and anti-bribery laws	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material	118
ESRS G1-4	Paragraph 24 (b)	Standards of anti-corruption and anti-bribery	Indicator number 16 Table #3 of Annex 1				Material	118



General disclosures

Disclosure requirements

ESRS 2	General disclosures	Section	Page number	Additional information
BP-1	General basis for preparation of sustainability statements	General basis for preparation of the sustainability report	47–48	
BP-2	Disclosures in relation to specific circumstances	Fintraffic sustainability plans in the medium and long term	48	
GOV-1	The role of the administrative, management and supervisory bodies	The role of the administrative, management and supervisory bodies	48	
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	48–49	
GOV-3	Integration of sustainability-related performance in incentive schemes	Integration of sustainability-related performance in incentive schemes	50–51	
GOV-4	Statement on due diligence	Statement on due diligence	51	Information on Fintraffic's sustainability due diligence process is disclosed across several sections of this report.
GOV-5	Risk management and internal controls over sustainability reporting	Risk management and internal controls over sustainability reporting	51	
SBM-1	Strategy, business model and value chain	Strategy, business model and value chain	56–57	
SBM-2	Interests and views of stakeholders	Interests and views of stakeholders	56, 59	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model	52–55, 59–60	
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Description of processes to identify and assess material impacts, risks and opportunities	60–61	
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	61–74	



Environmental information

Disclosure requirements

ESRS E1	Climate change	Section	Page number	Additional information
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E1-1	Transition plan for climate change mitigation	Transition plan for climate change mitigation	75-76	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model	76-77	
ESRS, IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Description of processes to identify and assess material climate-related impacts, risks and opportunities	77-78	
E1-2	Policies related to climate change mitigation and adaptation	Policies related to climate change mitigation and adaptation	78-79	
E1-3	Actions and resources in relation to climate change policies	Actions and resources in relation to climate change policies	79-80	
E1-4	Targets related to climate change mitigation and adaptation	Targets related to climate change mitigation and adaptation	80-83	
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Gross Scopes 1, 2, 3 and Total GHG emissions	84-86	
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Potential financial effects from material physical and transition risks and potential climate-related opportunities	87	



Social information

Disclosure requirements

ESRS S1	Own workforce	Section	Page number	Additional information
ESRS 2, SBM-2	Interests and views of stakeholders	Interests and views of stakeholders	91	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model	91–94	
S1-1	Policies related to own workforce	Policies related to own workforce	94–96	
S1-2	Processes for engaging with own workers and workers' representatives about impacts	Processes for engaging with own workers and workers' representatives about impacts	96–97	
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S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	98–102	
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	103	
S1-6	Characteristics of the undertaking's employees	Characteristics of the undertaking's employees	104	
S1-8	Collective bargaining coverage and social dialogue	Collective bargaining coverage and social dialogue	105	
S1-9	Diversity metrics	Diversity metrics	105	
S1-10	Adequate wages	Adequate wages	105	
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S1-14	Health and safety metrics	Health and safety metrics	106	
S1-15	Work-life balance metrics	Work-life balance metrics	106	
S1-16	Compensation metrics (pay gap and total compensation)	Compensation metrics (pay gap and total compensation)	106	
S1-17	Incidents, complaints and severe human rights impacts	Incidents, complaints and severe human rights impacts	107	



ESRS S3	Affected communities	Section	Page number	Additional information
ESRS 2, SBM-2	Interests and views of stakeholders	Interests and views of stakeholders	56, 59, 108-109	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model	52-55, 59-60	
S3-1	Policies related to affected communities	Policies related to affected communities	109-111	
S3-2	Processes for engaging with affected communities about impacts	Processes for engaging with affected communities about impacts	111	
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Processes to remediate negative impacts and channels for affected communities to raise concerns	111	
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Taking action on material impacts on affected communities, and approaches to managing material risks related to affected communities	111-112	
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	112	
ESRS S4	Consumers and end-users	Section	Page number	Additional information
ESRS 2, SBM-2	Interests and views of stakeholders	Interests and views of stakeholders	56, 59	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model	52-55, 59-60	
S4-1	Policies related to consumers and end-users	Policies related to consumers and end-users	113-114	
S4-2	Processes for engaging with consumers and end-users about impacts	Processes for engaging with consumers and end-users	114	
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Processes to remediate negative impacts and channels to address concerns of consumers and end-user	114	
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Actions in relation to material risks and opportunities	114	
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to managing material negative impacts and advancing positive impacts	114-115	



Governance information

Disclosure requirements

ESRS G1	Business conduct	Section	Page number	Additional information
ESRS 2, GOV-1	The role of the administrative, supervisory and management bodies	The role of the administrative, supervisory and management bodies	48	
ESRS 2, IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Management, metrics and targets of impacts, risks and opportunities	116	
G1-1	Business conduct policies and corporate culture	Business conduct policies and corporate culture	116	
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G1-4	Confirmed incidents of corruption or bribery	Confirmed incidents of corruption or bribery	118	
G1-5	Political influence and lobbying activities	Political influence and lobbying activities	118	



E1 Climate change

Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)

Fintraffic complies with the management remuneration principles approved by the Board of Directors as well as the recommendations of state ownership steering. These include the Government Resolution on the State Ownership Policy 2024 (2024) on the remuneration of the management of state-owned companies and, where applicable, the Corporate Governance Code 2020.

Fintraffic remuneration principles and practices are described in section ESRS 2 GOV-3 (page 50).

Strategy

Transition plan for climate change mitigation (E1-1)

The transition plan describes how Fintraffic adapts its strategy and operating model to respond to the

sustainable economy transition and the Paris Agreement 1.5°C target as well as and the EU Climate Law for 2050 carbon neutrality target. Fintraffic operations mainly consist of national digital and operative traffic control services that are not economic activities as defined in the taxonomy.

Fintraffic has defined emission reduction targets as per the Science Based Targets initiative (SBTi) criteria that comply with the 1.5°C target (scope 1, 2 and 3): -63% by 2035 and -90% by 2050. These targets are aligned with low-carbon measures that support the 1.5°C global target.

Key decarbonisation measures include:

- transition to fossil-free energy
- electrification of vehicle fleets and use of renewable fuels
- improving in-premises energy efficiency and technical infrastructure
- guidance related to and systematic measurement of low-emission procurements
- low-emission conversion of backup power systems (e.g. backup power generators)

The measures cover both own actions (Scope 1–2) and the extensive supply chain (Scope 3), which accounts for 93% of Fintraffic's total emissions.



As Fintraffic operations are not classified as economic activities in EU taxonomy, investments and funding assessments are made from the perspective of climate impact and decarbonization targets. The funding priorities are:

- energy efficiency investments
- transition to low-emission technologies (e.g. backup power generators, vehicles)
- modernisation of infrastructure and systems
- low-carbon procurement across the value chain

Fintraffic business is not based on carbon-intensive assets. Neither is the company significantly exposed to coal, oil or gas operations. Potential carbon lock-ins will be particularly detailed for:

- energy-intensive premises and infrastructure;
- backup power solutions and heating systems; and
- long-term supply chain agreements.

The impacts of the aforementioned considerations are assessed as part of the management of transition risks. As Fintraffic digital and operative traffic control services are not classified as economic activity within the EU taxonomy, the company does not produce taxonomy-based adaptation targets. Instead, Fintraffic operational development is linked to the transition plan aligned with the 1.5°C Paris Agreement, the EU Climate Act (carbon neutrality by 2050) and national climate targets.

For the sake of transparency, Fintraffic declares that its operations are not covered by EU-level emission intensity benchmarks. The transition plan is to be integrated into Fintraffic strategy, with the objective of smart and low-emission transport system front and centre. The plan influences investments, procurements and climate impact metrics. The transition plan will be prepared and submitted for decision-making in 2026.

To date, Fintraffic has made significant progress in achieving its climate targets,

- with total emissions decreased by 46.1% in 2024–2025
- Scope 3 calculation was specified
- the decarbonization trajectory for procurements expanded
- increased share of renewables in the energy portfolio

Fintraffic is yet itemise the OpEx or CapEx resources allocated to the climate change mitigation transition plan as a separate budget. Investments and operating expenses that support the transition are included in Fintraffic regular financial and investment planning, and their itemisation will be developed for future reporting periods. In addition, Fintraffic operations includes no economic activities related to coal, oil or natural gas, and do not incur capital costs.

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Fintraffic has identified climate risks as part of the Group's risk management and strategic planning. The identified risks are divided into two main categories:

- Climate-related physical risks: In particular, these include risks posed by extreme weather phenomena, floods, storms and temperature changes, which may impact the reliability of transport system infrastructure as well as Fintraffic operational premises and technical systems.
- Climate transition risks: These include regulatory changes, climate objective-related requirements, market changes and decarbonization needs across the supply chain. These are significant considerations for Fintraffic particularly as part of procurement (Scope 3).

Climate resilience in the strategy and business model

Scope of resilience analysis

The resilience analysis covers Fintraffic core operations, i.e. digital and operational traffic control services, including key premises, energy consumption, technical systems and the extended supply chain that accounts for 93% of the Fintraffic total emissions.

The analysis excludes insignificant value chain categories that are irrelevant to Fintraffic climate impacts or risks. The physical and migration risks identified as material are based on the TCFD framework and the CSRD/ESRS E1 requirements.

Conduct of resilience analysis

The resilience analysis has been conducted as part of the climate scenario-based risk assessment, which is aligned with ESRS 2 IRO1 requirements since 2024. The analysis:

1. Leverages climate scenarios that study the transition to decarbonized economy as well as various physical climate trends.
2. Makes critical assumptions related to:
 - changes in the energy system (transition from fossil to renewable energy)
 - speed of technology deployment (e.g. energy efficiency technologies);
 - macroeconomic trends and stricter future regulations
3. Applies different time horizons in line with Fintraffic climate objectives:
 - short-term (1–5 years)
 - medium-term (5–15 years)
 - long-term (until 2050, corresponding to the time profile for the emission reduction targets (E14))



4. Considers economic impact and mitigation measures particularly in terms of energy consumption, facility heating solutions, vehicle electrification, and decarbonization in the value chain. Precise quantification of economic impacts is still ongoing and is currently primarily assessed qualitatively.

Results of the resilience analysis

The resilience analysis demonstrates that Fintraffic's overall business model is climate-resilient. However, it identifies needs for development, especially in terms of energy solutions for premises, technical infrastructure preparedness, and decarbonisation in the value chain.

The analysis has identified the following key perspectives:

Uncertainties that influence Fintraffic investment and preparedness needs and strategic priorities:

- climate scenarios with different outcomes (+1.5 °C / +3-4 °C)
- increase in extreme weather phenomena
- Changes in supply chains and pressures for emission reduction

Strategic adaptability in different timespans:

- In the short term, the company will be able to optimise its energy use, improve the emission profile of premises and strengthen risk management.
- In the medium term, Fintraffic should plan technology and property upgrades to improve the climate resilience of critical systems (such as backup power solutions as well as communication and control systems).
- In the long term, Fintraffic has the capacity to modify its own service and technology architecture and, if necessary, to relocate or replace infrastructure.
- The availability of funding is expected not to pose significant risks as Fintraffic activities are not fossil-dependent and the company has no assets in the coal, oil or gas sectors.

Description of processes to identify and assess material climate-related impacts, risks and opportunities (ESRS 2 IRO-1 information disclosure requirement)

The identification and assessment process of Fintraffic's climate-related impacts, risks and opportunities is based on a comprehensive double materiality analysis that considers both the impacts on climate change and the risks and opportunities that climate

change poses to Fintraffic. The assessment covers the entire value chain and is based on ESRS, TCFD framework and GHG protocol methodology.

Processes to identify climate impacts (greenhouse gas emissions)

Fintraffic identifies and assesses its climate impacts by analysing all relevant sources of greenhouse gas emissions in its own activities and across its value chain:

- Greenhouse gas emissions throughout the value chain (Materiality 6,12): The primary actual sources of emissions are procurement (ICT, facility and maintenance services, electricity and gas), energy consumption (purchased energy and heat) as well as fuel for rolling stock.
- Emission sources are identified by the systematic screening of all activities and comparing them with GHG protocol definitions.
- Emission calculations are based on operational control, more detailed emission factors and annual improvement.

Processes for identifying and assessing physical climate risks

Fintraffic assesses short, medium and long-term physical risks using the IPCC RPC greenhouse gas scenario and the IAEA climate scenarios.

Identified essential physical risks include climate-related hazards:

- Disruptions caused by extreme weather events (Materiality value 6.53): Storms, floods, heavy rainfall and energy disruptions can damage control systems, facilities and technical infrastructure.
- Sudden natural phenomena and operational disturbances (Materiality value 5.07): Natural phenomena can interrupt traffic control services and impair traffic flow.

The following are considered in the assessment of exposure and sensitivity:

- critical sites, control systems and traffic control infrastructure
- exposure to climate risks (weather, hydrological variability and energy supply disruptions);
- the likelihood of the risk materialising, impact severity and duration

Fintraffic primarily classifies physical risks as limited, short-term but critical for services.

**Processes for identifying climate change transition risks and opportunities**

Fintraffic identifies transition risks and opportunities by comparing its own activities with the 1.5°C scenario and the trajectories of EU and national climate policies.

Identified transition risks (classified as non-material/material):

- Energy-related transition risks (materiality value 7.20, non-material): Tightening energy regulations, energy shortages or significant price increases may influence costs and investment needs.
- Increase in general costs as a result of climate change (materiality value 5.87, non-material): Increase in insurance, rent, maintenance and personnel costs.
- Changes in service demand as a result of climate action (materiality value 3.87, non-material): Changes in the demand for modes of transport (e.g. air transport).

Identified transition opportunities (significant, many relevant opportunities):

- Reducing traffic emissions (materiality value 10.43, material): Digital traffic control and real-time data will increase traffic efficiency and reduce emissions.

- Opportunities for multimodal transport chains (material value 9.06, material): Fintraffic enables the growth of new decarbonized services and business models.
- Potential for decarbonized transport (Material value 7.04, material): Changes in the ecosystem will increase Fintraffic's strategic role.
- Emission reductions from own operations (materiality value 5.32, non-material): Remote work, low-emission procurement as well as renewable fuels reduce direct emissions.
- Energy efficiency and renewable energy (materiality value 5.79, non-material)

Scenario analysis is integrated into Fintraffic risk management and strategic planning.

The scenario analysis supports Fintraffic's ability to prepare for changes in the energy market, develop decarbonized services and manage risks that may affect service capacity or cost structure.

Policies related to climate change mitigation and adaptation (E1-2)

Fintraffic's climate change management is based on the principles of sustainability and research-driven decision-making. The operating principles have been created to support both climate change mitigation as well as adaptation, covering the impact of both Fintraffic activities and those of the entire value chain.

Climate change mitigation

The operating principles for climate change mitigation guide the reduction of Fintraffic greenhouse gas emissions and the management of transition risks across various time ranges.

These operating principles cover, among other subjects, the emission reductions for own actions (Scope 1 and 2) by means of fossil-free energy solutions, improved energy efficiency and vehicle electrification as well as the assessment of the climate impacts of procurements across the value chain (Scope 3) and guiding partners towards decarbonized solutions.

Fintraffic climate work is based on its transition plan and Science-Based Target initiative (SBTi) which ensure that Fintraffic operations align with the 1.5°C Paris Agreement target, the carbon neutrality target detailed in the European Climate Law (2050) as well as national climate targets.

Fintraffic operating principles for climate change mitigation are included in the sustainability programme. Their implementation is based on defined measures whose progress is monitored with set objectives and metrics as part of the monitoring of the strategy and operational planning.

Progress is reported regularly in sustainability programme progress reports. The application and effectiveness of the principles and potential needs for their updating are assessed annually as part of the sustainability programme annual review.

Climate change adaptation

The adaptation-related policies focus on managing physical climate risks and related transition risks. These policies include ensuring business continuity during extreme weather events as well as assessing the risks for infrastructure and critical systems.

The climate risk assessment is based on the TCFD framework and is aligned with the CSRD and ESRS requirements as of the reporting year 2024.

The importance and comprehensiveness of the operating principles

The adaptation-related policies focus on managing physical climate risks and related transition risks. These policies include ensuring business continuity during extreme weather events as well as assessing the risks for infrastructure and critical systems.

The climate risk assessment is based on the TCFD framework and is aligned with the CSRD and ESRS requirements as of the reporting year 2024.

The importance and comprehensiveness of the operating principles

The objective of the operating principles is to ensure systematic and transparent identifications, assessment and management of Fintraffic's material impacts, risks and opportunities related to climate change. They are part of Fintraffic's comprehensive risk management and support strategic decision-making.



The policy has been developed in accordance with the ESRS 2 MDR P and forms the basis for managing the key impacts related to both mitigation and adaptation.

Fintraffic’s operating principles cover the planning and implementation of emission reductions, the management of transition risks, improving energy efficiency, consideration of climate impacts across the supply chain, and a research-based emission reduction pathway extending until 2050.

Actions and resources in relation to climate change policies (E1-3)

Fintraffic implements climate change mitigation and adaptation measures that target both its own operations and those of the value chain. The focus of these measures is to reduce energy consumption, introduce fossil-free energy sources, electrify vehicles and reduce emissions across the supply chain. These measures support the Carbon Neutral Finland 2035 objective and the long-term net-zero target.

Efficiency, low-carbon procurement and process development resources have been allocated for pursuing these measures.

Fintraffic climate measures include Science Based Targets initiative (SBTi) reductions, implemented as part of the long-term transition plan. Key objectives include reducing emissions from own actions (Scope 1 & 2) as well as the value chain (Scope

3) by up to 63% by 2035 vs. 2024. The planned measures include investments in energy efficiency, electrification and driving decarbonization across the supply chain in future competitive tendering.

Fintraffic provides a transparent description of its climate action and the associated resources, considering the time range, the material impact of the objectives, and resource dependence. Implementation necessitates investments, operational development, and procurement steering.

Decarbonisation methods at Fintraffic include transitioning to fossil-free energy, supply chain emission reductions (93% of emissions are generated by procurement), electrification of vehicles, and energy efficiency-improving technical solutions.

In the reporting year, Fintraffic achieved a total emission reduction of 46.1% compared to 2024 (29,387 tCO₂e → 15,841 tCO₂e).

	Reduction potential	Timetable	Current status of measure
Low-carbon investments and procurement criteria	High (applies to >80% of scope 3; not quantified)	2025–2035	Introduction of identified best practices in the procurement process, including life cycle calculations, environmental labelling, criteria bank
Construction and maintenance emissions	High , particularly for materials and logistics (not calculated tCO ₂ e)	2025–2035	Emission inventory for categories being processed, calculation development supported by Motiva.
ICT and digital service procurements	Medium , via electricity and equipment emissions	2025–2030	Device life cycle extensions, energy-efficient cloud services and software
Climate advice for partners and services	Unclear but potentially very high long-term impact	2027–2035	To be included as practical actions in agreement terms and procurement practices (see Section 7 – Stakeholder cooperation, p. 29)



All key stakeholders of Fintraffic are involved in the development and implementation of the climate transition plan, including scope 3 partner and climate steering for services.

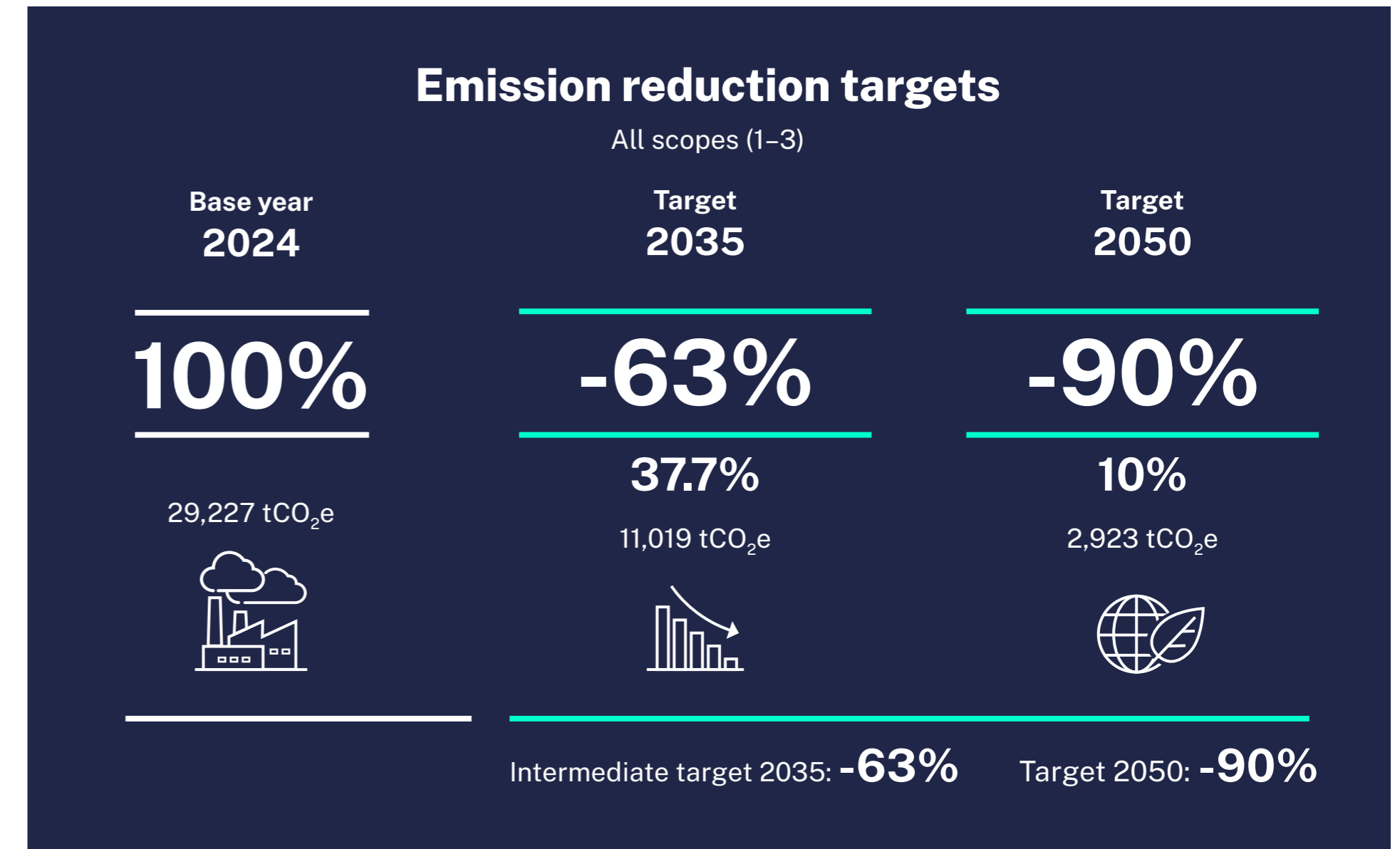
Stakeholder	Stakeholder role in Fintraffic's climate transition plan	General information on stakeholder
Customers and partners	<ul style="list-style-type: none"> Key partners of Fintraffic include the Finnish Transport Infrastructure Agency, Finavia, airlines, Traficom, ports, cities, the Finnish Defence Forces and the Finnish Border Guard Fintraffic follows established operating methods for hearing key partners and discussing their strategy and expectations that affect the development work of Fintraffic's transition plan 	<ul style="list-style-type: none"> Fintraffic is committed to transparent and honest reporting of climate transition planning, including The climate impacts (emission calculation) of Fintraffic operations and its value chain, emission reduction targets and the plan and measures to achieve the set targets. In addition to stakeholder expectations, Fintraffic observes e.g. any changes in legislation when updating the transition plan. Fintraffic observes stakeholder perspectives through the due diligence obligation and materiality assessment processes. Stakeholder feedback is regularly reported to Fintraffic's management, Board of Directors and the owner. Fintraffic utilises the shared situational picture created as part of climate transition work in discussions with stakeholders (e.g. Traffic Vision)
Public sector (excl. customers)	<ul style="list-style-type: none"> Fintraffic actively participates in public debate on themes related to the traffic sector's operating environment, including climate issues Fintraffic emphasises the impacts of traffic management and increasing the rate of traffic digitalisation on reducing emissions from transport and related decision-making 	
Citizens / end users	<ul style="list-style-type: none"> Fintraffic has no established operating model for dialogue with end-user customers, particularly consumers Fintraffic strives to raise public awareness of Fintraffic's climate plan as well as its role and actions, contributing to improving public awareness of Fintraffic and its employer image 	
Application developers and data users	<ul style="list-style-type: none"> Fintraffic cooperates with data ecosystem actors (200+ companies and organisations), leveraging data to drive transport-related climate work as part of other discussions Fintraffic plays an active role in coordinating the ecosystem and convening related meetings 	

Targets related to climate change mitigation and adaptation (E1-4)

Fintraffic has set objectives related to climate change mitigation and adaptation. These objectives support the company's environmental responsibility principles and the low carbonation of the entire traffic system. The objectives are based on scientific methods (SBTi) and comply with the 1.5-degree warming limit.

The company has defined comprehensive emission reduction targets for scope 1, scope 2 and scope 3 emissions:

These targets are defined as absolute emission reductions, achieved without the use of carbon credits or greenhouse gas removals. Scope 2 emissions are calculated as per market. The targets are defined as per the Fintraffic greenhouse gas inventory.





Targets related to climate change mitigation and adaptation (own business)

Theme	2026 target	2030–2035 target	Key actions
Own actions Scope 1 & 2 1. 63% reduction by 2035 2. 90% reduction by 2050 (SBTi net zero target)	Exact costs identified and approved for backup power generators, ~ 40% of passenger cars electrified 99.9% of electricity and district heating generation covered by guarantee of origin	80%+ of backup power generators transitioned to zero-emission sources 80%+ electrification rate for passenger cars	Amendment of energy agreements, acquisition of guarantee of origin: <ul style="list-style-type: none"> Review of the origin of the electricity used in passenger information displays, security cameras and public address systems in cooperation with VR Amendment of the Åland Energy Agreement, acquisition of guarantee of origin Replacement of the fuel used in Road division emergency power generators, review of the emergency power generator replacement cycle linked with infrastructure life cycle upgrades. Luukkola DGPS station, amendment of the Puumala and Körsö energy agreements, acquisition of guarantee of origin Energy efficiency measures: <ul style="list-style-type: none"> Initiating the planning of energy efficiency measures in Oulu and Kouvola Modernisation of the Tampere cooling system and utilisation of waste heat by means of heat pumps Energy efficiency planning for large tunnel construction projects Energy efficiency of equipment rooms (cooling/heating) Energy self-sufficiency (solar panels), remote monitoring and control capability Renewal of tunnel lighting Current tunnels ventilation control based on data and facts, operator orientation
Value Chain Scope 3 1. 63% reduction by 2035 (Category 1 - purchased products and services) 2. 90% reduction by 2050 (SBTi net zero target)	Promoting low-carbon solutions in key procurement*. Ongoing planning and implementation of low-carbon measures for key procurements by joint decision of the business operations Procurement emission calculations activity-based for portions exceeding 50%	Key procurements are low-carbon (2035).	<ul style="list-style-type: none"> Implementation of decisions on targeting measures at identified key procurements Developing and monitoring metrics Minimum responsibility requirements be introduced for procurements by category Updating responsibility requirements and reporting obligation clauses in existing agreements Training procurement staff In 2026, the potential to extend the low-carbon requirements to existing agreements are examined Updating the Responsible Procurement training material, role-specific compulsory training Developing emission calculations towards activity-based emissions, enabling reductions in calculated emissions by action

* "Key procurements" means procurements with the most significant low-carbon potential.

Scientific basis and compliance with the 1.5°C trajectory

The targets are based on Science Based Targets initiative criteria and the 1.5 °C trajectory. Up-to-date emission reduction factors have been used in the calculation. The base year 2024 was selected to represent the normal level of emissions in Fintraffic's operations. Emission trends are monitored annually.

Decarbonisation methods

Fintraffic emission reduction measures include:

- transitioning to fossil-free electricity
- improving energy efficiency, especially in facilities
- vehicle electrification and use of biofuels
- measures to reduce emissions in district heating
- emission reductions across the value chain through procurement

The quantitative contribution of the measures is detailed in the annual emission reduction trajectory and linked to the targets.



Climate change adaptation and risk management

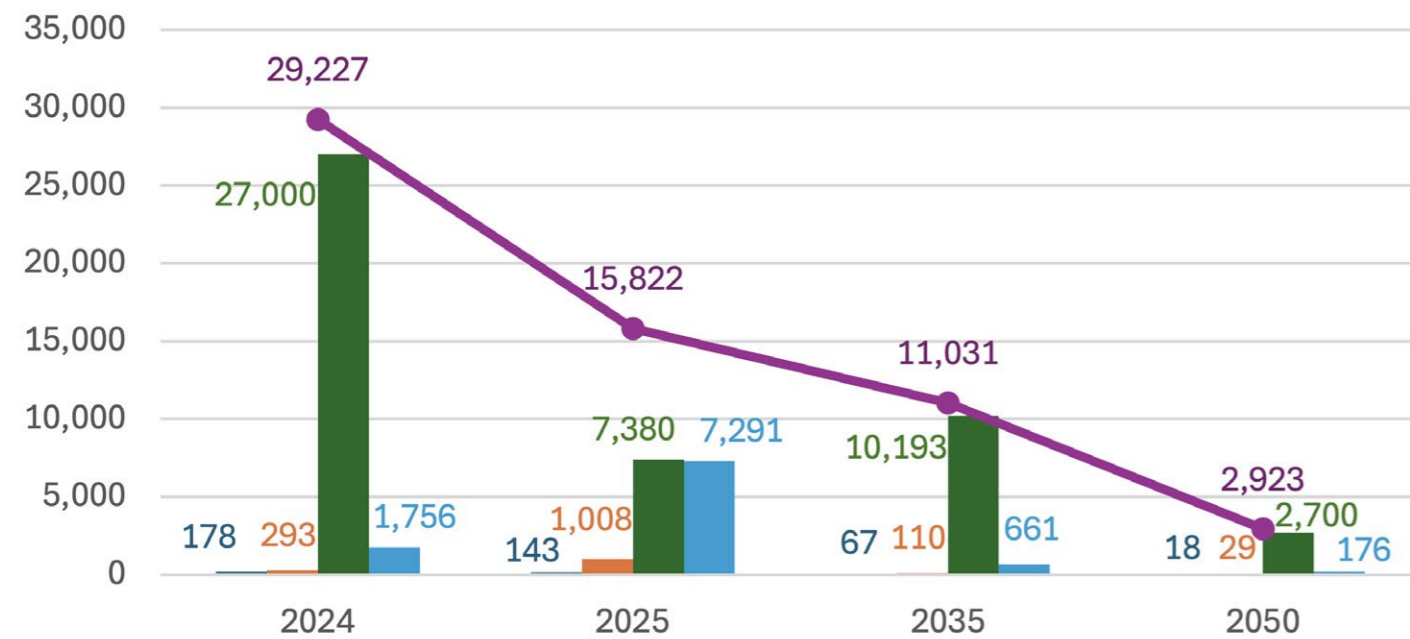
Fintraffic considers physical and transition risks as part of strategic planning and risk management. This assessment is based on the TCFD framework and aligned with the CSRD and ESRS requirements. Climate change adaptation objectives are related especially to reducing the risks of energy-intensive operations and safeguarding the operating conditions of the traffic system.

Scope 1 & 2 emissions (t CO ₂ -eq)	Base year (2024)	2035 target	Reference	2050 target	Reference: cross-sector emission pathway reference values
GHG emissions	471.4	177.4	Scope 1 + 2 calculated 8.48%/y	47.2	Scope 1 + 2 calculated 8.48%/y
Fuel switching	114	42.7	Proportional allocation to Scope 1	11.5	Proportional allocation to Scope 1
Electrification	64.8	24.3	Proportional allocation to Scope 1	6.5	Proportional allocation to Scope 1
Use of fossil-free energy	292.6	110.4	Relative reduction 8.48%/y	29.2	Relative reduction 8.48%/y
Absolute reduction in Scope 1 GHG emissions	-	111.8	Calculated	160.8	Calculated
Percentage of Scope 1 emissions of GHG emission reductions (in relation to base year emissions)	-	62.5%	Calculated	89.9%/y	Calculated
Intensity value of Scope 1 GHG emission reductions	-	8.48%/y	derived (relative trajectory)	8.48%/y	derived (relative trajectory)
Absolute reduction in location-based Scope 2 GHG emissions	-	1,121.2	Calculated	1,620.7	Calculated
Percentage of Scope 2 GHG emissions of GHG emission reductions (in relation to base year emissions)	-	63%	Calculated	90%	Calculated
Intensity value of location-based Scope 2 GHG emission reductions	-	8.48%/y	derived (relative trajectory)	8.48%/y	derived (relative trajectory)
Absolute reduction in market-based Scope 2 GHG emissions	-	182.2	Calculated	263.4	Calculated
Percentage of market-based Scope 2 reductions of GHG emissions (in relation to base year emissions)	-	63.3%	Calculated	90%	Calculated

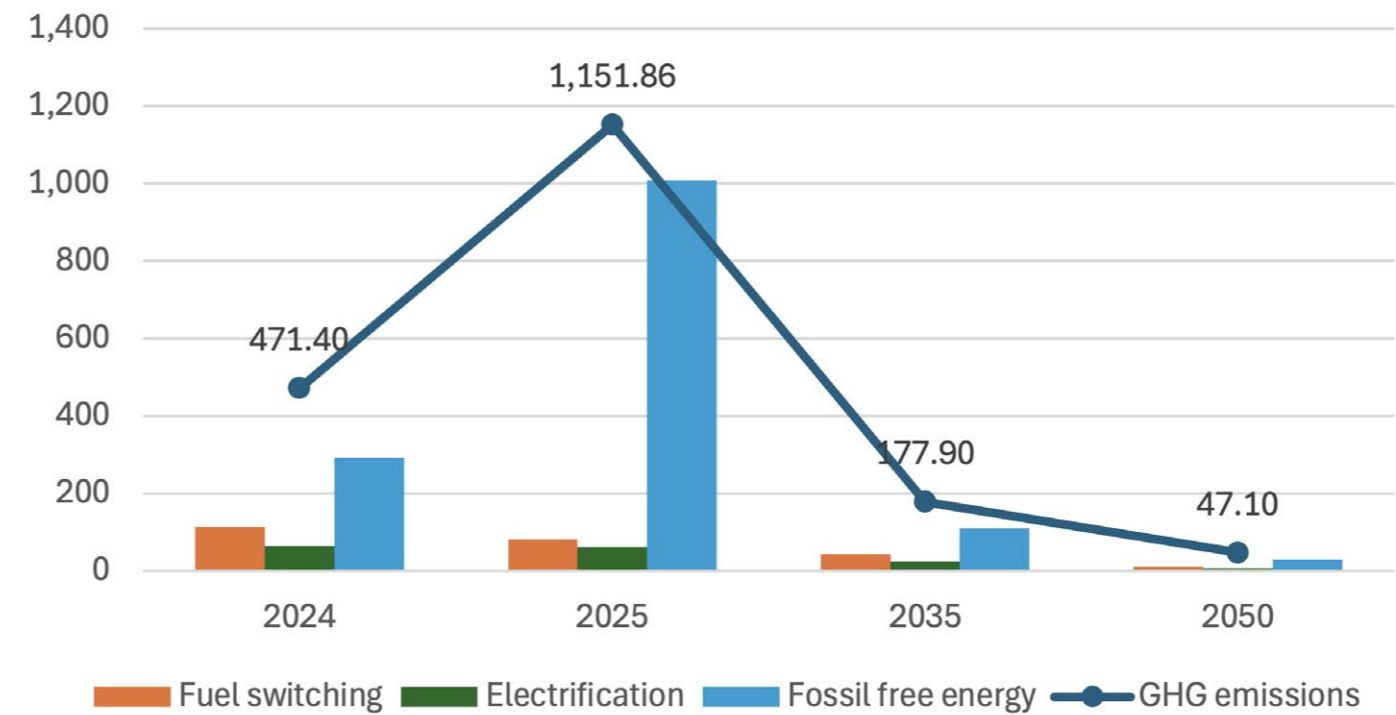


Scope 3 emissions	Base year (2024)	2035 target	Reference	2050 target	Reference: cross-sector emission pathway reference values
GHG emissions (tCO ₂ -eq)	28,756	10,854	Scope 3 calculated 8.48%/y	2,876	Scope 3 calculated 8.48%/y
Absolute reduction in Scope 3 GHG emissions	-	17,902	Calculated	25,880	Calculated
Percentage of Scope 3 emissions of GHG emission reductions (in relation to base year emissions)	-	62.25%	Calculated	90%	Calculated
Intensity value of Scope 3 GHG emission reductions	-	8.48%/y	derived (relative trajectory)	8.48%/y	derived (relative trajectory)

Development of greenhouse gas emissions by scope 2024–2050 (tCO₂e)



Scope 1 ja 2





Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)

Methodology for calculating GHG emissions

Fintraffic reports its greenhouse gas emissions in accordance with the GHG Protocol Corporate Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard as well as the ESRS E1 requirements. The scope of reporting is based on operational control. The reporting covers direct greenhouse gas emissions (Scope 1) from Fintraffic-owned operations, indirect greenhouse gas emissions (Scope 2) from the production of purchased energy as well as indirect greenhouse gas emissions from the rest of the value chain (Scope 3), including upstream and downstream as applicable. Notably, as of 2024 (baseline), Scope 3 greenhouse gas emissions are reported in more detail for significant emission sources than in previous years. In accordance with the principles of continuous improvement, the calculation, including its coverage and accuracy, are also specified in the 2025 calculation.

The calculation includes all greenhouse gases covered by the GHG protocol (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃) insofar as emission factors for all greenhouse gases are available for a given emission source. Emissions are converted into carbon dioxide equivalents. The equivalent figure has been used if it has been available. The data from previous

years will be corrected and updated, if necessary, to cover all greenhouse gases retroactively if only CO₂ emissions have been previously included in the calculation and potential adjustments to the emission factors make this possible. Biogenic emissions have been calculated and reported for emission sources for which this has been possible as per the available emission factors.

Scope 1 emission calculations are based on the fuels used by Fintraffic backup power generators and vehicle fleet. These calculations use fuel supplier-specific emission factors or nationally recorded emission factors.

Scope 2 emissions calculations include all purchased electricity used in Fintraffic premises and the traffic system electrical equipment as well as from electric vehicle charging. District heating emissions are calculated for all owned and rented premises. As required by operational control, Scope 2 calculations include all facilities controlled by Fintraffic irrespective of whether they are owned or rented by Fintraffic.

As per the GHG Protocol, Scope 2 CO₂ emission calculations use two different calculation methods: market-based and location-based. The market-based methodology uses producer-specific emission factors, complemented by national emission factors for residual electricity mix for untraceable purchased electricity. The location-based method uses

country-specific average emission factors for electricity and heat consumed.

Quantitative consumption data has been used in Scope 3 calculations whenever available; if quantitative data is unavailable, the emissions calculations are based on cash sums. The Scope 3 inventory also includes categories where the amount of greenhouse gases is not significant. The non-material categories included and excluded from Fintraffic calculations are given in the table on page 62.

Scope 1 – direct GHG emissions

Scope 1 GHG emissions decreased by 34 t CO₂e in 2025 compared to 2024. Declined use of fossil fuels in backup power generators and company cars was the major contributor for emission reductions.

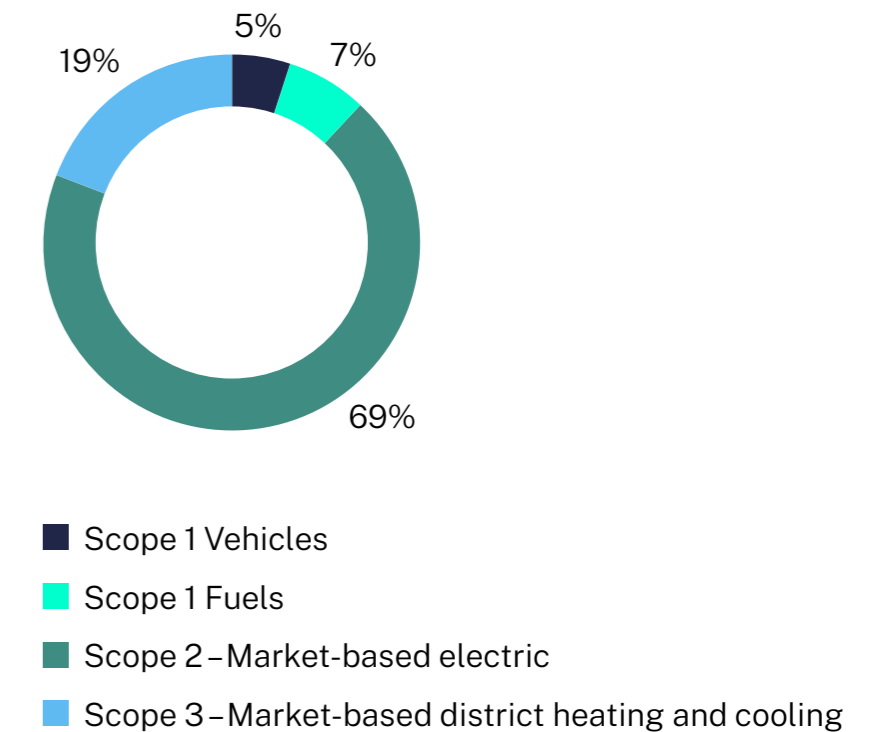
Scope 2 – Indirect emissions from purchased energy

Scope 2 emissions increased due to emissions from Fintraffic-controlled rented facilities were included in Scope 2 calculations for 2025. The use of fossil fuels declined last year and, consequently, average emissions from location-based calculations have decreased as well.

Market-based Scope 2 calculations consider renewable electricity purchase agreements and guarantees of origin to the extent that they have been acquired.

District heating of properties is currently of mixed production, with the aim to change to fossil-free sources in the next few years.

Emission distribution by source (2025)

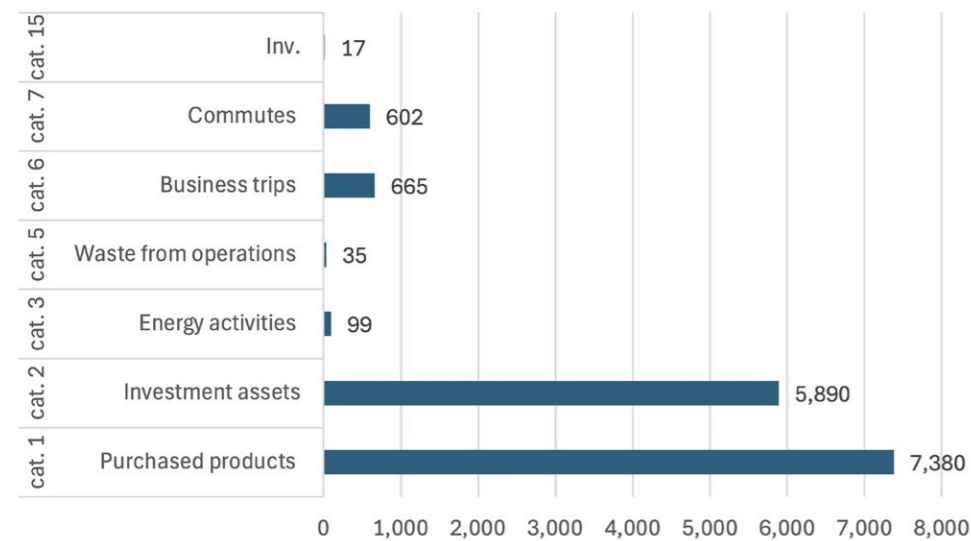




Scope 3 – Indirect emissions from the value chain

Changes were made in the accuracy of the Scope 3 emissions calculations for 2025 compared to previous years. Total emissions for the reporting year 2025 are significantly reduced compared to previous reports. This change is primarily due to a corrected calculation and allocation regime aligned with the GHG Protocol rather than actual operational changes.

Scope 3 emissions by category (2025)



Total GHG emissions

The biggest impact is observed on Scope 3 categories 1 (Purchased Goods and Services) and 2 (Capital goods). When processing the 2025 calculation, it was noted that previous calculations included in category 1 items that the GHG Protocol classifies in other emission classes and categories.

- As emissions from the use of facilities and properties are reported under Scope 2, property rental fees should not be included separately in category 1.
- Emissions from the fuels and energy consumption of leased equipment, machinery and vehicles are included in Scope 1 and 2. While emissions from the primary production of leased assets is subject to non-compulsory calculation under category 8, these are not included in Fintraffic calculations.
- Direct emissions from fuels are included in Scope 1; the emissions from their primary production are reported in Scope 3, category 3, and therefore emissions from fuel purchases are not considered in category 1.

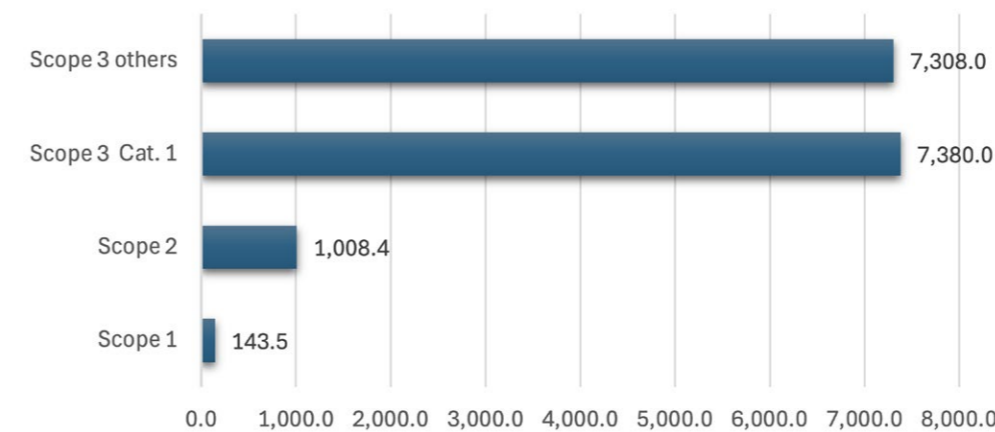
Investments have been itemised under category 2, enabling Fintraffic to better identify the emissions of long-term products and services investments made during the year.

Previous calculations may have included in category 1 items such as taxes, credit card interim accounts, collection fees, leasing services or other administrative costs that do not fall in that category in the GHG Protocol.

In addition to the specified limitations, more accurate emission factors significantly affect the total emissions. The rows for expenses have been better aligned with the chart of accounts, resulting in a more detailed emission factor being applied to each account instead of a general average factor. More accurate alignment typically leads to more realistic and often smaller overall emission estimates.

The other scope 3 categories normal annual variation in calculation.

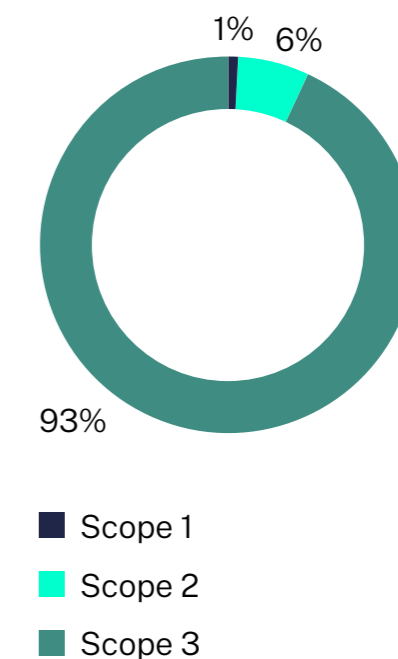
Distribution of greenhouse gas emissions (Scope 1–3, tCO2e)



Summary

The emission profile of Fintraffic is strongly tied to the value chain; Scope 3 accounts for the majority of total emissions. Scope 1 and 2 combined only constitute approximately 7% of Fintraffic emissions. This emphasises the key role of procurement, energy self-sufficiency of premises and the indirect impacts of service production in the mitigation of climate impacts. Fintraffic follows the principle of continuous improvement and refines its calculations annually.

Distribution of emissions by scope (2025)




Scope 1 GHG emissions

Gross Scope 1 GHG emissions (tCO ₂ e)	143
Percentage of Scope 1 GHG emissions in regulated emissions trading schemes (%)	0%

Scope 2 GHG emissions

Gross location-based Scope 2 GHG emissions (tCO ₂ e)	1,881
Gross market-based Scope 2 GHG emissions (tCO ₂ e)	1,010

Significant Scope 3 GHG emissions

Total gross indirect (Scope 3) GHG emissions (tCO ₂ e)	14,671
1. Purchased goods and services	7,380
2. Investment assets (fixed assets)	5,890
3. Fuel and energy related operations (not included in scope 1 or 2 emissions)	99
4. Inbound transport and distribution	0
5. Operational waste	35
6. Business travel	665
7. Commutes	602
8. Upstream leased assets	0
9. Outbound transport	0
10. Further processing of sold products	0
11. Use of sold products	0
12. End of life processing of sold products	0
13. Downstream leased assets	0
14. Franchise operations	0
15. Investments	0

Total GHG emissions

Total GHG emissions (location-based) (tCO ₂ eq)	16,695
Total GHG emissions (market-based) (tCO ₂ eq)	15,824

Scope 1 GHG emissions

	Base year (2024)	Year of comparison (2025)	% N / N-1	2035	2050	Annual % target / base year
Gross Scope 1 GHG emissions (tCO ₂ e)	178		-19.66%	67	18	8.48% (relative)
Percentage of Scope 1 GHG emissions in regulated emissions trading schemes (%)	-	0%	-	-	-	-

Scope 2 GHG emissions

Gross location-based Scope 2 GHG emissions (tCO ₂ e)	1,800.5	1,801	+ 4.47%	679	180	8.48%
Gross market-based Scope 2 GHG emissions (tCO ₂ e)	293	1 010	+244.71%	110	29	8.48%

Significant Scope 3 GHG emissions

Total gross indirect (Scope 3) GHG emissions (tCO ₂ e)	28,756	14,688	-48.92%	10,854	2,876	8.48%
1 Purchased goods and services	27,000	7,380	-72.67%	10,193	2,700	8.48%
Other (cat. 2-15)	1,756	7308	+316.17%	661	176	8.48%

Total GHG emissions

Total GHG emissions (location-based) (tCO ₂ e)	30,734.5	16,712	-45.6%	11,600.3	2,923	8.48%
Total GHG emissions (market-based) (tCO ₂ e)	29,227	15,841	-45.8%	11,031	3073.8	8.48%

GHG intensity per net revenue

	Year of comparison (2025)	N (2024)	% N / N-1
Total GHG emissions (location-based) per net revenue (tCO ₂ e/monetary unit)	62.43	121.17	-48.5%
Total GHG emissions (market-based) per net revenue (tCO ₂ e/monetary unit)	59.17	115.26	-48.7%

	2025	2024
Net revenue used to calculate GHG intensity	267.7	253.6
Net revenue (other)	-	-
Net revenue, total (in the financial statements)	267.7	253.6



Potential financial effects from material physical and transition risks and potential climate-related opportunities E1-9

Fintraffic has assessed the impacts of climate change-related material physical risks and transition risks in accordance with the ESRS E1 standard and the resilience assessment based on scenario analysis. The assessment covers short-, medium- and long-term effects.

Material physical risks and their economic impact

The physical risks to Fintraffic operations particularly relate to the increased intensity of weather phenomena, such as storms, floods and infrastructure disruptions caused by the weather. These may impact traffic control systems, the availability of premises and the continuity of service provision.

Based on the scenario analysis, critical assets subject to physical risks (e.g. traffic control centres, data centres, radar and sensor systems, critical telecommunications connections, backup power solutions) constitute a limited portion of Fintraffic total assets. However, their operational significance is high. The economic impacts may be reflected in increased maintenance and repair costs, disruption management costs and possible loss of income caused by service disruptions (value chain). Some of the assets are subject to risk-mitigating measures that support adaptation to climate change.

Material transition risks and their economic impact

The transition risks identified by Fintraffic consist of the economic and operational impacts of the transition to a decarbonized economy (including investment needs), ever-stricter regulations, the impacts of public policy measures and ownership steering, and changes in market and technology structures.

Key transition risks in Fintraffic operations include:

- stricter climate and efficiency requirements
- procurement criteria affecting emission reductions
- technological changes in traffic systems
- stricter climate requirements by customers

The estimate of the economic impacts is based on Fintraffic's approved emission reduction targets (-63% by 2035 and -90% by 2050, against the 2024 baseline). The estimate is based on the current emission structure in which Scope 3 emissions account for approximately 93% of total emissions and are mainly related to procurement, services, investments and energy consumption in the value chain.

The greatest economic impacts affect the supply chain and investment decisions. Achieving emission reduction targets may require prioritising low-emission solutions in competitive tendering, stricter supplier requirements and broader consideration of life-cycle costs. This may increase short- and

medium-term costs, especially for ICT systems, traffic control systems, energy efficiency solutions for premises, and vehicles.

In addition, the transition may affect the value of certain assets. The risk particularly applies to systems, equipment or agreements based on energy or technology with high emissions and whose economic viability may be reduced by tighter regulation or technological developments. This may lead to accelerated depreciation or unexpected investments for replacement.

Climate-related opportunities

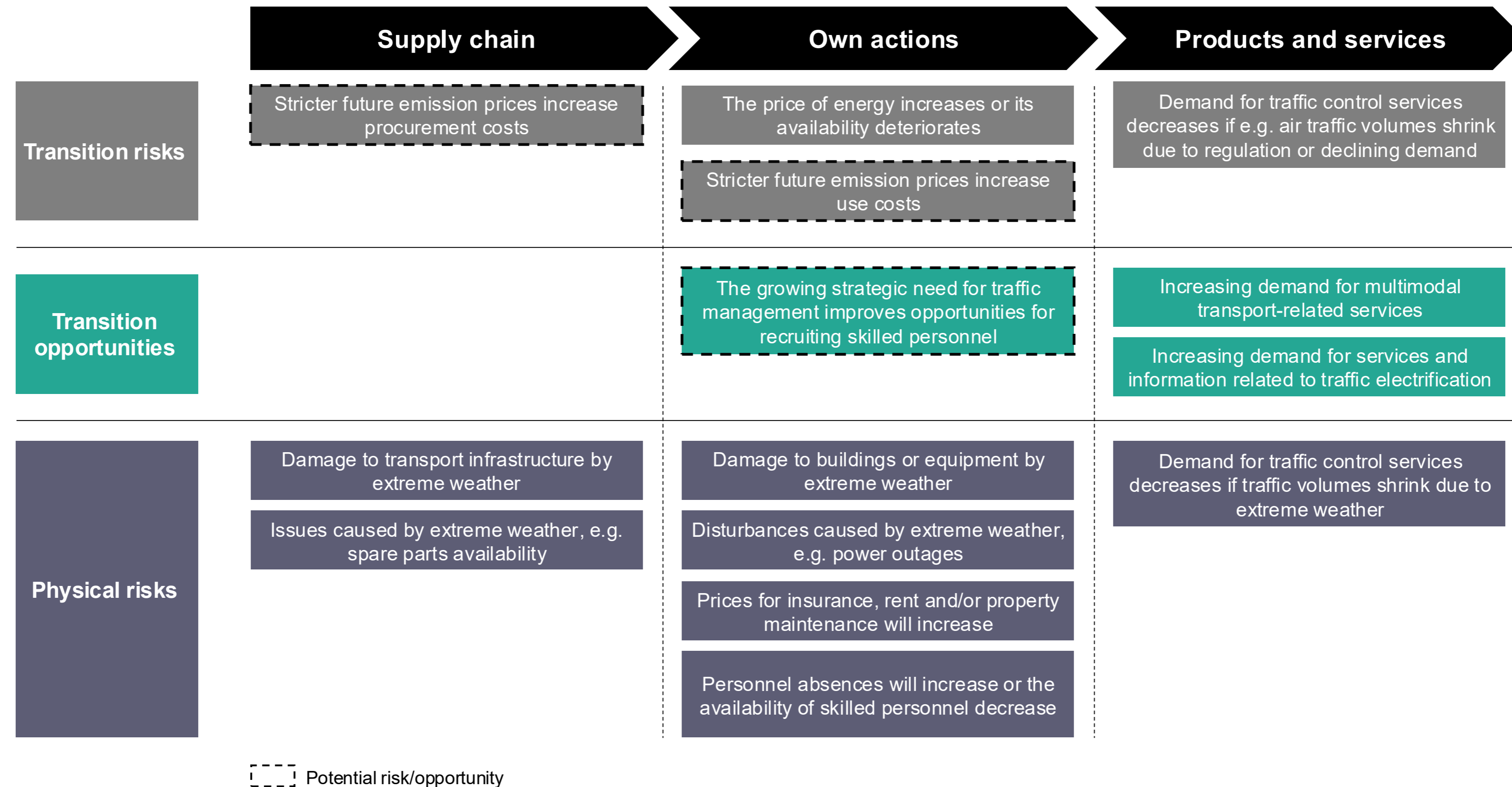
Climate-related opportunities offer significant economic potential for Fintraffic. Key opportunities include:

- Improving energy efficiency in transport: Fintraffic services (e.g. route optimisation, disruption management, traffic data) reduce fuel consumption and emissions across the entire transport system.
- Low-carbon service solutions: The growth of digital services and data-driven management will increase demand for Fintraffic expert and technology services.
- Cost savings in own operations: The use of fossil-free energy, electrification and optimised energy consumption will reduce long-term costs.

Opportunities positively affect both turnover trends and operational efficiency, and their utilisation supports the transition towards net-zero targets.



The identified climate risks emphasise physical risks throughout the value chain: the transition could create demand for new services





Reducing emissions is a critical part of the management of transition risks; opportunities should be linked to business development

	Transition Risk / Opportunity	Mechanism	Impact	Probability	Timetable	Possible control methods
RISK	Stricter future emission prices increase procurement costs	Increased costs	<i>Not estimated (moderate?)</i>	<i>Not estimated (60–80%, >80%?)</i>		<ul style="list-style-type: none"> Updating procurement criteria to include emissions assessment
	The price of energy increases or its availability deteriorates	Increased costs	●●●○○	●●●○○		<ul style="list-style-type: none"> Energy efficient solutions Price protection mechanisms
	Demand for traffic control services decreases if e.g. air traffic volumes shrink due to regulation or declining demand	Decreased turnover	●●●○○	●●○○○		<ul style="list-style-type: none"> Few means within Fintraffic control Increasing overall efficiency, e.g. by building ecosystem services
	Stricter future emission prices increase use costs	Increased costs	<i>Not estimated (small?)</i>	<i>Not estimated (20–40%)</i>		<ul style="list-style-type: none"> Emission reductions for own actions (particularly fossil energy)
OPPORTUNITY	The growing strategic need for traffic management improves opportunities for recruiting skilled personnel	Increase in turnover	<i>Not estimated (small?)</i>	<i>Not estimated (40–60%)</i>		<ul style="list-style-type: none"> Employer communications
	Increasing demand for multimodal transport-related services	Increase in turnover	●●●○○	●●●○○		<ul style="list-style-type: none"> Market monitoring Increasing capabilities
	Increasing demand for services and information related to traffic electrification	Increase in turnover	●●○○○	●●●○○		<ul style="list-style-type: none"> Market monitoring Increasing capabilities

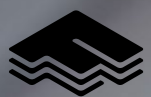
Potential risk/opportunity

Fewer than 5 years
5–10 years
More than 10 years



Fintraffic’s business operations are more susceptible to physical risks than average, preparation for various conditions is important

	Physical risk	Mechanism	Impact	Probability	Timetable	Possible control methods
PHYSICAL RISK	Damage to transport infrastructure by extreme weather	Decreased turnover	●●○○○	●●●○○	▶▶▶	<ul style="list-style-type: none"> Changes in own infrastructure (protection)
	Issues caused by extreme weather, e.g. spare parts availability	Increase in costs, decrease in turnover	<i>Not estimated (moderate?)</i>	<i>Not estimated (<20%?)</i>	▶▶▶	<ul style="list-style-type: none"> Sufficient stocks
	Damage to buildings or equipment by extreme weather	Increase in costs, decrease in turnover	●●○○○	●●●○○	▶▶▶	<ul style="list-style-type: none"> Changes in own infrastructure (protection)
	Disturbances caused by extreme weather, e.g. power outages	Increase in costs, decrease in turnover	●●○○○	●●●○○	▶▶▶	<ul style="list-style-type: none"> <i>Changes in own infrastructure (protection)</i>
	Prices for insurance, rent and/or property maintenance will increase	Increased costs	●●○○○	●●●○○	▶▶▶	<ul style="list-style-type: none"> Protection mechanisms <i>Cost forecast</i>
	Personnel absences will increase or the availability of skilled personnel decrease	Increase in costs, decrease in turnover	●●○○○	●●●○○	▶▶▶	<ul style="list-style-type: none"> Organisation of activities, workplaces and job opportunities to provide alternative ways of working
	Demand for traffic control services decreases if traffic volumes shrink due to extreme weather	Decreased turnover	●●○○○	●●○○○	▶▶▶	<ul style="list-style-type: none"> Preparing for exceptional circumstances and providing traffic management services to support operators



S1 Own workforce

Interests and views of stakeholders (SBM-2)

The interests, views and rights of Fintraffic's own workforce are considered in the company strategy and business model, so that employees' views are heard through several different forums. As Fintraffic operations are limited to Finland, the rights of its employees are safeguarded in accordance with Finnish legislation.

The views and opinions of the personnel are taken into account in decision-making as far as possible. The interests and views of stakeholders are discussed in more detail in ESRS 2 and in section S1-2.

Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

The Group Management Team reviews the material impacts, risks and opportunities related to Fintraffic's own workforce in connection with the risk assessment, which is carried out regularly. Sustaina-

bility reviews include discussion on the impact of the risks and opportunities associated with Fintraffic's own workforce on the strategy and business model as well as the impacts of the strategy and business model on the company's own workforce. With regard to possible changes in business activities, the potential impacts on Fintraffic's own workforce will be carefully assessed separately in each case. Opportunities for own workforce are also assessed as part of an annual work community development plan, which is discussed in collaboratively with shop stewards/workers' representatives and occupational safety and health representatives.

In accordance with Finnish labour law practice, Fintraffic's own workforce is considered to include Fintraffic's contractual employees as well as CEOs working under an executive employment contract who, according to Finnish labour law practice, are considered statutory company bodies rather than employees. Fintraffic only occasionally employs private traders, such as freelancers who produce content. Fintraffic makes little use of temporary agency workers working directly under Fintraffic supervision. There are also consultants employed by other companies working in different projects. At the time of reporting, there were 467 such persons who also partly work for other customers. These persons are not included in Fintraffic's own workforce. In the double materiality analysis, the impacts have been



considered to affect Fintraffic's own workforce, i.e. contracted employees.

All Fintraffic employees are covered by the information published by Fintraffic in accordance with ESRS 2.

Negative impacts

Material negative impacts on own workforce are mainly related to individual cases. As part of the double materiality analysis, employee privacy, including data security, has been assessed as a material topic for Fintraffic. As a critical actor for security of supply, Fintraffic may be exposed to information and cybersecurity threats, which entails the risk that the employees' personal data may be exposed to data leaks. This concerns all employees, and the threats are targeted against Finland, where all Fintraffic operations take place.

As part of the double materiality analysis, the negative impacts related to occupational safety and health have been assessed as a material topic for Fintraffic. As we provide traffic control services around the clock, more than 64 per cent of our personnel do shift work. Especially night work involves identified stress factors that are managed by means of shift planning and by providing personnel with training on, for example, the importance of sufficient sleep and healthy lifestyles.

Positive impacts

As part of the double materiality analysis, competence development has been assessed as a positive impact on Fintraffic's own workforce. Competence development measures include, in particular, training provided by the employer, which is expected to have a positive impact on the person's career development and work motivation. To develop the employees' competence in areas essential for the strategy, we have initiated a competence survey of strategic competences to measure how our competence targets coincide with the current level of competence. Defining and verbalising competences that are critical for the strategy also helps the personnel better understand the strategy and the requirements it sets for competence.

Key competences from a strategy perspective have been mapped together with business operations. All experts completed a competence survey in 2025. The critical competences of those tasked with traffic control work were defined during 2025 and mapped at the end of the year. This mapping will continue in 2026.

As part of the double materiality analysis, promoting an equal work community has been assessed as a positive impact on Fintraffic's own workforce. Fintraffic wants to promote non-discrimination and equality among its own workforce. An equal work community that takes into account

inclusion, fair opportunities for advancement and adequate compensation promote the wellbeing and motivation of employees. The development of equality and non-discrimination is assessed as part of the annual personnel satisfaction survey. In the 2025 survey, the non-discrimination score had improved compared to 2024 (3.55 → 3.66). The work-life balance and wellbeing section had also improved measurably (3.79 → 4.08).

As part of the double materiality analysis, the promotion of worker health and wellbeing has been assessed as a material topic for Fintraffic concerning its own workforce. Fintraffic strives to strengthen the health and wellbeing of its employees through various measures. Fintraffic has been awarded the Mental Health Friendly Workplace certificate by Mieli ry for 2022–2026. Fintraffic offers a significantly broader occupational health care scheme than the one required by law. It covers all Fintraffic employees regardless of the character and duration of the employment relationship. Occupational health care promotes a healthy working environment and safe working conditions. In addition to statutory preventive occupational health care, Fintraffic offers its employees comprehensive medical care services at the level of general practitioners and specialists included in voluntary occupational health care. Workers also have access to occupational physiotherapists (including direct appointments), physiothera-

pists and occupational health psychologists. Short-term psychotherapy will be offered with a referral from an occupational healthcare physician and occupational psychologist. Occupational health services for Fintraffic are provided by Suomen Terveystalo Oy.

Mood Chat 24/7 and online Mood Sparring are also included in our wellbeing services. Everyone working at Fintraffic can use Cuckoo, an app that provides mindfulness exercises and short fitness programmes for breaks. Alma Talent's extensive online bookshelf is also available to all personnel, offering books on topics such as self-management and work community skills.

In 2025, Fintraffic supported the wellbeing of its personnel through exercise campaigns, comprehensive occupational health care services and Happi Health, a low-threshold mental wellbeing service. Company bikes were popular in 2025, with nearly 300 Fintraffic workers opting for the benefit.

According to our occupational health care partner Terveystalo, we take extensive care of monitoring sickness absences and working capacity negotiations. The Terveystalo-provided wellbeing index indicates a positive trend: In 2025, the wellbeing index was 93.73 per cent, compared to 93.33 per cent the previous year. In 2021, the index was 86.7%. The index describes the share of people who do not experience any of the following problems: inadequate



control over work, conflicts in harmonising work and other areas of life, insufficiently rewarding work, insufficient social support at work, stress and job dissatisfaction. The wellbeing index is based on the responses to the health survey conducted by Terveystalo.

According to the TyöOptimi wellbeing survey conducted by Terveystalo in spring 2025, 82% of Fintraffic respondents report doing well (compared to 2024: 82% and 2023: 77%). In Terveystalo's comprehensive comparison data of more than 10,000 respondents, 66% of the respondents reported doing well. Prevalence of burnout or risk of burnout was fifty per cent lower in Fintraffic than in Terveystalo reference data (8% vs. 16 %).

Of Fintraffic personnel, 20 per cent are overweight, and most of them suffer from at least one disease associated with overweight, such as diabetes. Fintraffic has supported the weight management of its staff in a number of ways, which has resulted in significant improvements: in 2022, as many as 27 per cent of Fintraffic staff were overweight. The occurrence of overweight in Terveystalo reference data stands at 25 per cent, a figure that has remained constant during the corresponding review period.

One of the key measures for addressing this challenge is our pioneering wellbeing project, Fit for Future Fintraffic. It is aimed at inspiring insights into lasting weight management and strengthening

motivation to foster personal wellbeing with the support of a multiprofessional team. The occupational health care provider selects the participants from interested employees. To support their weight management, the participants are prescribed weight management medication under the supervision of an occupational health physician. The programme has yielded excellent results.

The positive impacts listed above affect Fintraffic's own workforce as a whole.

Risks, opportunities and dependencies

As part of the double materiality analysis, employees' skill gaps, the availability of skilled labour and industrial action have been identified as essential risks related to Fintraffic personnel. The risks concern the entire personnel and are geographically limited to Finland, where all Fintraffic operations take place.

Fintraffic operations are based on the provision of expert services and therefore are fundamentally dependent on the sufficient availability of skilled personnel. This requires both continuous competence development of existing personnel as well as the ability to recruit new talent with particular skills in the labour market. We provide traffic control and management services 24/7/365. Absences or interruptions in service provision could cause significant disruptions in traffic and logistics.

A high union density increases the impact of any industrial action, posing a risk to service continuity. Industrial action may affect both traffic control operations and, on a more general level, the provision of expert services.

The double materiality analysis has also identified an opportunity arising from a strong and attractive employer image. Fintraffic is currently working on a corporate culture development project for strengthening the shared operating culture and commitment. 2025 saw the completion of the Fintraffic corporate culture manual which includes input from personnel. Furthermore, the majority of Fintraffic personnel report finding their work meaningful. These factors are perceived to support Fintraffic's ability to attract, engage and develop skilled workforce in the long term.

Impacts related to transition plans

Greenhouse gas emissions from Fintraffic's own business operations are typical for expert services organisations, primarily originating from procurements. Fintraffic's fossil dependency level is low, and most of our energy purchases are from fossil-free sources.

Fintraffic has set emission reduction targets based on scientific data, driving the Carbon Neutral Finland 2035 target and the limitation of global warming to 1.5 degrees in accordance with the Paris

Agreement. These targets are not expected to result in significant negative impacts, such as personnel reductions from structural reforms, on personnel in Fintraffic's own business.

However, the future phase-out of fossil fuels may affect the emphases and operating models between different modes of transport at the transport system level. The potential impacts of these changes on Fintraffic service offering or personnel needs are beyond reliable assessment at the time of writing.

As technological development and automation increase, the need for manual operative traffic control work may decrease, which in turn may have an impact on the amount of operative work. This trend is partly demonstrated in the current situation: the number of people engaged in purely operational traffic control work has decreased while the number of those engaged in expert work has increased. Advances in automation may thus have a particularly negative impact on personnel groups engaged in traffic control. However, the increased automation of manual work may enable more diverse work and create more meaningful tasks. In addition, advances in artificial intelligence may have significant impacts on office and expert work in the future, but reliable assessment of the extent of these impacts is impossible at the time of writing.

To prepare for the changes, Fintraffic is currently conducting a survey of the strategic competences,



which assesses the level of employees' competence in relation to competences critical for the implementation of the strategy. The survey has been completed by expert personnel and is ongoing for operative personnel. The survey results have already been used in the training of experts, and similar measures will be implemented for operative personnel as well. Targeted training aims to prevent potential negative impacts on personnel and to support the development of competence in the face of change. The resources allocated to impact management consist of software acquired for competence mapping and work by HR, experts and supervisors.

Policies related to own workforce (S1-1)

Fintraffic's key operating principles regarding its own workforce are outlined in the sustainability programme. The policies are:

1. respect for human and labour rights;
2. ensuring personnel wellbeing and occupational safety;
3. development of staff competence;
4. strengthening equality and non-discrimination;
5. close engagement with own personnel;
6. processes to address negative impacts and raise concerns.

The policies cover Fintraffic's entire workforce.

Human rights policy commitments

In accordance with our sustainability policy, respect for human rights is a key principle in Fintraffic's operations. We are committed to supporting the UN Global Compact's Action Plan and its principles relating to the environment, labour, human rights, and anti-bribery and anti-corruption measures. Fintraffic is also involved in promoting the UN Sustainable Development Goals. We respect the key human rights declarations, such as the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, including freedom of association and effective recognition of the right to collective bargaining, the elimination of all forms of forced labour, the effective prohibition of child labour and the elimination of discrimination in the labour market. Fintraffic is also committed to respecting employees' labour rights as a member of Service Sector Employers Palta.

In practice, Fintraffic's policies correspond to the UN Guiding Principles on the corporate responsibility for human rights. As the company's activities have not been considered to involve significant human rights risks, Fintraffic has not yet implemented all the formal processes required by the UN principles on business and human rights. The human rights impact assessments are conducted as part of the company-wide overall risk assessment.

Engagement with people in Fintraffic's own workforce

Interaction between employees and employers is regular and transparent. Employees have an opportunity to provide feedback through an annual employee satisfaction survey conducted with an external service provider. It also offers an opportunity to give open feedback. The 2025 Pulssi survey included a total of 1,851 comments. The feedback is carefully reviewed by the top management as well. Topical issues are also discussed in triannual reports and personnel briefings organised several times a year, where it is possible to bring up personal views and ideas.

The company also engages with the employees through its workers' representatives. Fintraffic's cooperation group meets four times a year. In addition, transport mode-specific cooperation meetings are held to discuss matters related to the mode of transport concerned. At the meetings, workers' representatives are informed about matters and consulted. In the matters referred to in the Act on Co-operation within Undertakings, they can also participate in decision-making. As the employer's representatives, the meeting is attended by the CEO of each business or a person authorised by the CEO and the Chief Human Resources Officer or employee relations manager. The Chief Human Resources Officer is responsible for organising the meeting.

Minutes shall be kept of the meetings and the open points will be returned to in the next meetings. Workers' representatives are reimbursed for attending the meetings and for the costs derived from attending them. The employer's representatives use sufficient working hours to ensure engagement with the workforce. The CEO of each business is responsible for hearing the views of the employees and taking them into account in decision-making.

The dialogue referred to above means the processing of matters between the employer and the workers' representative, which promotes sufficient and timely flow of information between the employer and the employees as well as the employees' possibilities of exerting influence in matters concerning their work, working conditions or position. Dialogue will take place on the following matters:

1. the development prospects and financial situation of the company or organisation;
2. rules, practices and policies applicable to the workplace;
3. workforce use and personnel structure;
4. personnel competence needs and competence development;
5. maintaining and promoting wellbeing at work.

In addition, meetings of the Occupational Safety and Health Committee are organised, where the occupational safety and health representatives represent the



entire personnel. Fintraffic's company-specific occupational safety and health committees meet twice a year on average. Fintraffic's occupational safety and health organisation acts as an expert in occupational safety and health matters at the workplace and participates in safety and health cooperation.

The task of the occupational safety and health organisation is to monitor the safety and health situation at the workplace and to implement occupational safety and health objectives and measures. The organisation's tasks also include making development proposals related to occupational safety and health and supporting the line organisation's and supervisors' occupational safety and health management activities across Fintraffic. The tasks and meetings of the occupational safety and health organisation are specified in more detail in the agreements between the employer and employee organisations. The duties are based on the Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces (44/2006). A precondition for implementing and developing safety at work is good cooperation and mutual trust between the management, supervisors and personnel.

Fintraffic has a wellbeing at work group that meets about once a month. The members include not only employer's representatives but also shop

stewards or workers' representatives and occupational safety and health representatives. The wellbeing at work group discusses topical issues related to personnel wellbeing.

In potential change situations, the personnel are consulted as required by the Act on Co-operation within Undertakings, either through their representatives or directly. In accordance with the Act on Co-operation within Undertakings, the employer must consult the personnel, for example, when the employer considers measures which may lead to notice of termination, lay-off or reducing a contract of employment to a part-time contract of one or several employees on financial or productive grounds or to unilateral amendment of an essential condition of the employment contract. Any major changes in duties, working methods, arrangement of work and work premises, or arrangements in the regular working hours that affect the position of one or several employees considered by the employer that fall within the scope of the employer's power of management are also covered by the obligation to negotiate on changes. Depending on the matter, the negotiations may take more than three weeks. During them, the personnel can express their views and concerns about the employer's plans. The views and opinions of the personnel are taken into account in decision-making as far as possible. In 2025, we held change negotiations on the reorganisation of joint services, the

reorganisation of office work in Rail Traffic Management and changes to the work arrangements of shift managers and regional control. These change negotiations covered the operations of Rail Traffic Management and the Kouvola office. Further change negotiations concerned the facility arrangements for Vantaa Air Navigation Services and the reorganisation of the Kajaani-Kuusamo flight information services.

Measures to provide remedy for human rights impacts

No human rights impacts that would have required remedy were identified in 2025. As Fintraffic operates in Finland, its stakeholders have access to state-guaranteed legal remedies. Regarding Fintraffic's own workforce, these are the dispute resolution procedure referred to in the collective agreements, contacting or submitting an enforcement request to the occupational safety and health authority (Occupational Safety and Health Department of the Finnish Supervisory Agency) and bringing the matter before the competent court. Employees can also contact the Office of the Non-Discrimination Ombudsman or the Office of the Equality Ombudsman. In practice, the remedies being used are compensation or damages paid by the company.

Internationally recognised instruments

In practice, Fintraffic's policies correspond to the UN Guiding Principles on the corporate responsibility for human rights. As the company's activities have not been considered to involve significant human rights risks, Fintraffic has not yet implemented all the formal processes required by the UN principles on business and human rights. The human rights impact assessments are conducted as part of the company-wide overall risk assessment.

Workplace accident prevention policies

Fintraffic's occupational safety and health action plan defines the principles and focus areas for safety and health activities as well as the occupational safety and health responsibilities of the management, supervisors and employees. Fintraffic's occupational health and safety activities aim at a safe and healthy workplace, working environment and work community. The aim is to maintain the health and work ability of the personnel throughout their careers and to prevent health problems and workplace accidents. The objective of zero occupational accidents guides Fintraffic's occupational safety and health work.

The occupational health and safety activities are based on Fintraffic's values and strategy, and they support the achievement of the social, business and wellbeing objectives of Fintraffic. The activities are



based on existing legislation. Occupational safety and health activities are based on the development and continuous improvement of the occupational safety culture. These activities have a proactive focus. Any identified deviations and problems prompt an immediate response. Close cooperation and mutual trust between the management, supervisors and personnel is a precondition for implementing and developing safety and wellbeing at work.

Policies on eliminating discrimination and harassment

Fintraffic's anti-discrimination and anti-harassment measures and measures to promote diversity and inclusion are described in the equality and non-discrimination plan which has been prepared in cooperation with personnel representatives. The new equality and non-discrimination plan was written at the end of 2025.

At Fintraffic, equality and non-discrimination include the fair treatment of every person regardless of their gender, age, ethnic background, religion, state of health, possible disability, sexual orientation, gender identity or other personal factors.

Fintraffic aims at equal treatment of individuals, addressing inequalities, fair and caring management, increasing confidentiality, open processing of matters, interactive and active communication, and preventing all forms of discrimination. In addition to

non-discrimination and equality based on law and moral perspectives, Fintraffic emphasises the management of diversity (age, gender, ethnicity, physical abilities, values, differences in work tasks and so on) from the business perspective. The management of employee diversity and an atmosphere that values diversity are considered to give a competitive advantage and to improve its productivity.

Commitments and intervention

In the Helsinki premises phased in during 2024–2025, gender diversity was a consideration in the design of staff rooms and disabled access across the premises.

Fintraffic has drawn up the principles of a psychologically safe workplace in cooperation with occupational safety and health and the employer's representatives. The wellbeing at work group and the Group Management Team have discussed the principles and included them in the cultural handbook completed at the end of 2025.

So far, Fintraffic has not made any other policy-related commitments concerning inclusion or positive actions for the benefit of persons belonging to particularly vulnerable groups in the company's own workforce.

Discrimination is addressed as described in the equality and non-discrimination plan and in the guidelines prepared to prevent harassment and inappropriate treatment. The Chief Human

Resources Officer is responsible for anti-discrimination and anti-harassment policies and their implementation.

Processes for engaging with own workers and workers' representatives about impacts (S1-2)

Interaction between employees and employers is regular and transparent. Employees have an opportunity to provide direct feedback through an annual employee satisfaction survey conducted with an external service provider. It also offers an opportunity to give open feedback. The 2025 Pulssi survey included a total of 1,851 comments as open feedback. The feedback is carefully reviewed by the top management as well. As the survey is anonymous, it can be thought that this provides employees belonging to minority groups or who are otherwise in a vulnerable position a low-threshold opportunity to express their opinions. This engagement is of a consultative nature.

Almost every month, a personnel briefing is organised to which all employees of the company are invited. The briefing can also be attended remotely. The briefing enables employees to ask questions and discuss their views and ideas. The briefings are recorded, and the recording is published on the company's intranet. This engagement is of a consultative nature.

Fintraffic also engages with its employees through its workers' representatives. Fintraffic's cooperation group meetings, which discuss matters concerning the Group as a whole, convene four times a year. In addition, business-specific cooperation meetings are held to discuss matters related to the given mode of transport. At the meetings, workers' representatives are informed about matters and consulted. In the matters referred to in the Act on Co-operation within Undertakings, they can also participate in decision-making. As the employer's representatives, the meeting is attended by the CEO of each business or a person authorised by the CEO and the Chief Human Resources Officer or employee relations manager. The Chief Human Resources Officer is responsible for organising the meeting. Minutes shall be kept of the meetings and the open points will be returned to in the next meetings. Workers' representatives are reimbursed for attending the meetings and for the costs derived from attending them. The employer's representatives use sufficient working hours to ensure engagement with the workforce.

The CEO of each business is responsible for hearing the views of the employees and taking them into account in decision-making. If the cooperation negotiations have concerned the reduction of personnel, the employer will notify in writing what decisions it will take after the cooperation negotia-



tions have been held. Depending on the matter, this engagement is either consultative or participatory by nature as defined in the Act on Co-operation within Undertakings.

The dialogue referred to above means the processing of matters between the employer and the workers' representative, which promotes sufficient and timely flow of information between the employer and the employees as well as the employees' possibilities of exerting influence in matters concerning their work, working conditions or position. Dialogue will take place on the following matters:

1. the development prospects and financial situation of the company or organisation;
2. rules, practices and policies applicable to the workplace;
3. workforce use and personnel structure;
4. personnel competence needs and competence development;
5. maintaining and promoting wellbeing at work.

Fintraffic organises regular meetings of the Occupational Safety and Health Committee in which the occupational safety and health representatives represent the entire personnel. Fintraffic's company-specific occupational safety and health committees meet twice a year on average. The engagement is of either consultative or participatory nature.

Fintraffic's occupational safety and health organisation acts as an expert in occupational safety and health matters at the workplace and participates in safety and health cooperation. The task of the occupational safety and health organisation is to monitor the safety and health situation at the workplace and to implement occupational safety and health objectives and measures. The organisation's tasks include making development proposals related to occupational safety and health and supporting the line organisation's and supervisors' occupational safety and health management activities in the parent company and subsidiaries. The tasks and meetings of the occupational safety and health organisation are specified in more detail in the agreements between the employer and employee organisations. The duties are based on the Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces (44/2006).

A precondition for implementing and developing safety at work is good cooperation and mutual trust between the management, supervisors and personnel. Depending on the matter, this engagement is of either consultative or participatory nature.

Fintraffic has a wellbeing at work group that meets about once a month. The members include not only employer's representatives but also shop

stewards or workers' representatives and occupational safety and health representatives. This engagement is of a consultative nature.

The personnel have been given the opportunity to share their perspectives on equality as part of the annual personnel satisfaction survey. This engagement is of a consultative nature.

In potential change situations, the personnel are consulted either through their representatives or directly. The views and opinions of the personnel are taken into account in decision-making as far as possible as required by the Act on Co-operation within Undertakings. Being an expert organisation, Fintraffic's own carbon emissions are low, which means that environmental measures related to its own activities are not expected to have any personnel reduction impacts, for example through structural reforms. If there were any impacts, the personnel would be consulted and their perspectives considered before making decisions as required by the Act on Co-operation within Undertakings.

Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

If the company's plans are considered to have negative impacts on its own workforce, ways to mitigate them will be sought in cooperation with the workers or workers' representatives even before

decisions are made as described in the Act on Co-operation within Undertakings. This includes the preparation of a statutory action plan. Fintraffic employees can report their concerns and needs to their own supervisor, HR management, shop steward or workers' representative, occupational safety and health representative or occupational health care. All Fintraffic employees also have access to an anonymous whistleblowing channel, which allows them to bring any grievances they have observed to the attention of the company's top management. The channel allows the whistleblower to specify which group company the report concerns.

The anonymous whistleblowing channel was set up by Fintraffic in 2022 and implemented and managed by an external service provider. There is a link to the whistleblowing channel both on the company's intranet and external websites. Notifications submitted to the whistleblowing channel shall be submitted to the Deputy CEO and the Chief Human Resources Officer for consideration. The measures taken shall cover the investigation of the matter, the preparation of the response and, where appropriate, the measures required by the reported incident. A statement of the measures taken shall be given to the whistleblower. The reports are reviewed together with the Audit Committee, which acts as the executive committee of the company's Board of Directors, and the cooperation group in which



workers' representatives are present. The deadlines laid down in the Whistleblower Protection Act (1171/2022) are observed in the processing of reports submitted to the whistleblowing channel. The annual personnel survey asks if employees are aware of the anonymous whistleblowing channel. As the identity of the whistleblower is not disclosed to the employer, no processes have been created to protect the whistleblower from retaliation.

Employees belonging to a trade union may bring grievances they have observed subject to the dispute resolution procedure agreed in the collective agreement. If no agreement can be reached between the shop steward and the employer, the employee and employer associations will take the dispute under advisement.

All employees can contact the Occupational Safety and Health Department of the Finnish Supervisory Agency or ultimately bring the dispute before a competent court.

Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4)

The Group Management Team reviews the material impacts, risks and opportunities related to Fintraffic's own workforce in connection with the risk

assessment. In accordance with the risk management policy included in Fintraffic's Corporate Governance guidelines, the risk assessment is reviewed at least twice a year with the Management Team and the Board of Directors' Audit Committee. Fintraffic also tries to manage negative and positive impacts on its own workforce as well as risks and opportunities as part of strategic planning and operational planning. The impact of the risks and opportunities associated with Fintraffic's own workforce on the strategy and business model and vice versa are discussed as part of the strategy process.

With regard to possible changes in business activities, the potential impacts on Fintraffic's own workforce will be carefully assessed separately in each case. Opportunities for own workforce are also assessed as part of an annual work community development plan, which is discussed in cooperation with shop stewards or workers' representatives as well as occupational safety and health representatives.

Fintraffic's HR department employs 16 professionals in the field. The operations are led by an experienced Chief Human Resources Officer who is a member of the Group Management Team and reports to the Group CEO. Payroll is outsourced to our partner. Both HR employees – HR Business Partners, employee relations managers and the Chief Human Resources Officer in particular – and business management engage in regular dialogue with HR

representatives. The Group-wide cooperation group, which includes shop stewards and workers' representatives as well as occupational safety and health representatives from all business operations and shared services, as well as the CEOs of business operations and the Chief Human Resources Officer, convenes four times a year. Regular company-specific cooperation meetings are also held.

The wellbeing at work group led by the wellbeing manager and including shop stewards and workers' representatives, occupational safety and health representatives and the occupational safety and health manager, meets almost monthly. The personnel can also express their views in an anonymous personnel survey organised once a year. In the 2025 survey, the personnel gave open feedback amounting to 1,851 comments. Based on the feedback received in the Pulssi personnel surveys in previous years, Fintraffic introduced the popular employee bike scheme and Fintraffic's student exchange programme, in which employees familiarise themselves with the work of another unit for one day. The employees' opinions are also sought in various projects, e.g. corporate culture work.

Negative impacts

As part of the double materiality analysis, employee privacy, including data security, has been assessed as a material topic for Fintraffic. As a critical actor for

security of supply, Fintraffic may be exposed to information and cybersecurity threats, which entails the risk that the employees' personal data may be exposed to data leaks. The risk is managed by appropriate technical protection measures and by training the personnel to detect and report deviations.

As part of the double materiality analysis, the promotion of the health, safety and wellbeing of employees has been assessed as a material topic for Fintraffic. As we provide traffic control services around the clock, more than 64 per cent of our personnel do shift work. Especially night work involves identified stress factors that are managed by means of shift planning and by providing personnel with training on, for example, the importance of sufficient sleep and healthy lifestyles. Office work, which is daytime work, is carried out quite flexibly as hybrid work. People at Fintraffic experience less exhaustion and stress than in reference companies. Fintraffic combats the risks associated with stress factors by encouraging its personnel to lead a healthy lifestyle, supporting personnel well-being through various initiatives (including the Fit for Future Fintraffic weight management pilot project in 2025), regular health checks, provision of a break exercise application free of charge for employees and by providing comprehensive wellbeing, cultural and exercise benefits.

**Positive impacts**

As part of the double materiality analysis, competence development has been assessed as a material topic for Fintraffic. One of material positive impacts on Fintraffic's own workforce is training provided by the employer, which is estimated to have a positive impact on the person's career development and work motivation. In the future, its positive impact is planned to be examined as part of the Pulssi survey by asking the personnel about their experiences of the usefulness of training provided by the employer. To develop our employees' competence in areas essential for the strategy, we have implemented a competence survey of strategic competences to measure how our competence targets coincide with the current level of competence. Defining and verbalising competences critical for the strategy also helps the personnel to better understand the strategy and its competence requirements.

In connection with the competence survey, each employee will prepare a personal development plan with their supervisor, in which they record which competences they primarily need to develop and by what means. The development plan will be linked to development discussions held once a year. In other words, the measures will be transferred to the development discussion template of the personnel information system.

As part of the double materiality analysis, an equal work community has been assessed as a material topic for Fintraffic. Fintraffic wants to promote non-discrimination and equality among its own workforce. An equal work community that takes into account inclusion, fair opportunities for advancement and adequate compensation promote the wellbeing and motivation of employees. The planning stage for the new Helsinki premises project included consideration for gender diversity in staff room design and disabled access across the premises.

Fintraffic has drawn up the principles of a psychologically safe workplace in cooperation with occupational safety and health and the employer's representatives. These principles are included in the corporate culture handbook completed at the end of 2025. Experiences of non-discrimination and equality measures have been surveyed as part of the annual personnel satisfaction survey where personnel have reported measurable improvements.

As part of the double materiality analysis, the promotion of worker health and wellbeing has been assessed as a material topic for Fintraffic. The health and wellbeing of employees is promoted through numerous measures. Employer's actions to support the wellbeing of their own workforce have been assessed as material positive impacts on Fintraffic's own workforce.

Fintraffic has been awarded the Mental Health Friendly Workplace certificate by Mieli ry for 2022–2026. Fintraffic offers a significantly broader occupational health care scheme than the one required by law. It covers all Fintraffic employees regardless of the character and duration of the employment relationship. Occupational health care promotes a healthy working environment and safe working conditions. In addition to statutory preventive occupational health care, Fintraffic offers its employees comprehensive medical care services at the level of general practitioners and specialists included in voluntary occupational health care. Workers also have access to occupational physiotherapists (including direct appointments), physiotherapists and occupational health psychologists. Short-term psychotherapy will be offered with a referral from an occupational healthcare physician and occupational psychologist. Occupational health services for Fintraffic are provided by Suomen Terveystalo Oy. Fintraffic employees report higher well-being than the reference data encompassing all Terveystalo customers.

Mood Chat 24/7 and online Mood Sparring are also included in our wellbeing services. Everyone working at Fintraffic can use Cuckoo, an app that provides mindfulness exercises and short fitness programmes for breaks. Alma Talent's extensive online bookshelf is also available to all personnel,

offering books on topics such as self-management and work community skills.

In 2025, Fintraffic supported the wellbeing of its personnel through exercise campaigns, comprehensive occupational health care services and Happy Health, a low-threshold mental wellbeing service. Company bikes remained popular in 2025, with nearly 300 Fintraffic employees opting for the benefit.

According to our occupational health partner Terveystalo, Fintraffic manages work capacity matters exceptionally systematically, comprehensively and productively. In 2025, the wellbeing index was 93.73 per cent, compared to 93.33 per cent the previous year. In 2021, the index was 86.7%. The index describes the share of people who do not experience any of the following problems: inadequate control over work, conflicts in harmonising work and other areas of life, work is not sufficiently rewarding, not enough social support at work, stress and job dissatisfaction. The wellbeing index is based on the responses to the health survey conducted by Terveystalo.

According to the TyöOptimi wellbeing survey conducted by Terveystalo in spring 2025, 82% of the respondents at Fintraffic are doing well. In Terveystalo's comprehensive comparison data of more than 10,000 respondents, 66% of the respondents reported doing well. In 2024 the figure stood at 82 per



cent as well for Fintraffic, indicating that reported well-being has remained at a high level. Prevalence of burnout or risk of burnout was fifty per cent lower in Fintraffic than in Terveystalo reference data (8% vs. 16 %).

Of Fintraffic personnel, 20 per cent are overweight, and most of them suffer from at least one medical condition linked to overweight, such as diabetes. Fintraffic has supported the weight management of its staff with a number of measures, yielding significant results: in 2022, as much as 27 per cent of Fintraffic staff were overweight. The occurrence of overweight in Terveystalo reference data stands at 25 per cent, a figure that has remained constant during the corresponding years (2022–2025). One of the key weight management measures is the pioneering wellbeing Fit for Future Fintraffic project. It is aimed at inspiring insights into permanent weight management and strengthening motivation to foster personal wellbeing with the assistance of a multiprofessional team. The occupational health care provider selects the participants from interested employees. To support their weight management, the participants are prescribed weight management medication under the supervision of an occupational health physician. The programme yielded excellent results, with participants losing up to 18–23 kg, with an average of 12 kg. 67% of participants achieved significant weight loss. The participants reported high

satisfaction with the programme in the Terveystalo feedback survey.

Risks related to Fintraffic's own workforce have been described as part of the double materiality analysis. Fintraffic's operations consist of the sale of expert services, which means that the operations are entirely dependent on expert personnel. The availability of skilled labour has been identified as a material risk. To prevent the risk, Fintraffic trains its personnel comprehensively.

Fintraffic Rail Traffic Management includes training programmes for the various operational tasks and for the task of a work instructor. In addition, the business has training institution rights granted by the Finnish Transport Infrastructure Agency for railway safety (TURVA), railway system basic training (Pera) and traffic controller training. In addition to basic training and qualification training, regular refresher and in-service training are conducted to ensure that our personnel competences are relevant and up-to-date.

Fintraffic Air Navigation Services' personnel undergo continuous and regular training. This ensures that personnel competences remain at a satisfactory level. Avia College, which operates as part of Air Navigation Services, organises basic training for air traffic controllers and flight information service officers. It also organises unit and supplementary training at the unit level. Avia College

also provides initial and refresher training for in-service trainers and competence assessors. Basic training for flight instructors, maintenance of qualifications and refresher training as well as the intra-unit training are conducted by the instructors of the flight advisory unit. The Air Rescue Coordination Centre conducts basic training, competence maintenance and refresher training for flight rescue managers, instructors and other personnel as well as other internal training for the unit. In addition to air rescue training, the Air Rescue Centre provides training cooperation based on agreements between the authorities. The Airspace Management Cell conducts basic training, competence maintenance and refresher training for flight its personnel as well as other internal training for the unit. In addition, the unit conducts training on airspace reservation processes for various airspace reservers. Basic and system training on air navigation technology are organised jointly with the Czech Air Navigation Institute. Maintenance of qualifications as well as equipment and refresher training are conducted internally by technical personnel.

Fintraffic Vessel Traffic Services organises training for VTS operators and shift supervisors in accordance with the Vessel Traffic Service Act. The basic VTS operator training is described in the quality system. The learning paths of project managers, project owners and project team members are

described on the Group's intranet. Operational personnel practise situations related to their professional competence in simulators. Both Fintraffic Vessel Traffic Services Centres have a designated simulator coordinator tasked with building and implementing appropriate exercises together with the training organisation.

At Fintraffic Road Traffic Control, the training programme for road traffic centre operators is built on module-based training periods. The purpose of the module format is to ensure that the training is suitable for both those with a longer and those with a shorter operator experience so that they can develop and maintain their professional skills. The modular approach also provides an opportunity to quickly adapt training to the changes in the operating environment. The purpose of the training is to guarantee a nationally uniform level of competence and a nationally uniform service level for traffic control.

Monitoring and assessment

The targets, metrics and measures related to the development and maintenance of personnel resources that support the management of the company's special assignment concern high-quality management, healthy and satisfied personnel and the strengthening of equality and non-discrimination. All of these involve development measures and targets as well as



metrics, some of which are monitored as part of the strategy programmes and some as part of the sustainability programme. The Board of Directors is regularly informed of the progress of both the strategy and the sustainability programme.

The targets are related to increasing the health and wellbeing of employees and reducing the perceived harmful workloads. Efforts will also be made to mitigate the adverse effects of shift work. Discrimination and harassment will be addressed, and equality will also be improved by developing family-friendly workplace practices. For instance, we are involved in the Family-Friendly Workplace Program of the Family Federation of Finland and participate as a pilot company in the Care4Career project co-financed by the EU.

Fintraffic offers its personnel training that is estimated to have a positive impact on the person's career development and work motivation. The related competence mapping project is described in an earlier section.

Three of the metrics related to high-quality management consist of personnel satisfaction survey indicators. These include activities in line with the values, the supervisor index and the success of management. Other indicators of high-quality management include an internal customer satisfaction survey for shared services and a reputational survey.

The indicators related to healthy and satisfied personnel consist of the personnel satisfaction survey indicators, i.e., eNPS, overall result and workload. The way the sick leave rate develops is also monitored. The equality and non-discrimination indicators are part of the personnel satisfaction survey conducted by Fintraffic partner Balentor.

Assessing the necessary and appropriate actions

Fintraffic's management has selected the appropriate and necessary actions to respond to the negative impacts on the company's own workforce. The identified risks have been discussed with workers' representatives in the cooperation group. Cyber and information security incidents and deviations are processed, monitored and tracked in the safety reporting and risk management systems. The Fintraffic Data Security Management Team and Data Security Officers for each business area regularly review the status of cyber security and data security and maintain a list of threats and risks. Cyber security and data security threats have been addressed as part of the risk assessment.

The workload experienced by the personnel has been discussed in operational planning as part of the priority process. Prioritisation of development measures has postponed some projects, releasing resources for the most critical projects. Measures

related to shift and night work have been discussed in the management of the business areas. Efforts have been taken to reduce the negative impacts of shift and night work on managing alertness by, for example, including breaks in shifts, providing tailored solutions to work shifts in cases of identified work ability issues and introducing office workout equipment to control rooms.

Plans and measures to mitigate risks

Lack of employees' competence and experience can lead to not only decreased job satisfaction but also increase in various safety risks. This risk is addressed by training and inducting personnel. Business-specific training is described in an earlier section.

Fintraffic's operations depend on the work input of competent personnel. Due to a strike or other industrial action, the activities may stop completely, causing a decrease in the service level and even loss of income. The threat of industrial action is addressed by seeking to engage in continuous dialogue with workers' representatives and to negotiate collective agreements well in advance, while the previous collective agreement is still in force. If Fintraffic is subjected to industrial action, the work can to some extent be carried out by supervisors. In the view of the trade unions, the right to strike is part of the freedom of association under International Labour Organisation (ILO) Convention No 87. Fintraffic respects

workers' rights and lacks employer measures to completely eliminate the impact of industrial action.

Engaging key persons and recruiting the necessary capabilities is critical for operations. Possible negative impacts on terms of employment or working conditions may cause reputational damage, which makes recruitment and thus the company's operations more difficult. As described above, Fintraffic strives to look after its personnel and develop the work community, building a positive workplace experience for its personnel. As part of the development of its corporate culture, Fintraffic's corporate culture manual was completed at the end of 2025, with the entire personnel invited to provide input.

Plans and measures to pursue opportunities

Adhering to fair working conditions and terms of employment, and investing in safety, health and wellbeing at work as well as diversity and inclusion in the work community are considered to strengthen the positive employer image and thus contribute to the recruitment of future talents and retaining the good workers.

The competence mapping, completed by experts and ongoing for operative personnel, examined the level of competence among Fintraffic personnel in certain strategy-critical areas. A gap analysis was based on the survey and used in the planning of training. The aim is to direct competence devel-



opment measures to the right issues, especially those areas experiencing the greatest competence gaps. At the same time, the competence survey makes the strategy concrete for the personnel and promotes discussion between supervisors and subordinates on the employees' competences. As part of the survey, employees can report their interest in developing a certain competence.

In addition to the above measures, Fintraffic participates in the Family Friendly Workplace Program of the Family Federation of Finland and acts as a pilot company in the EU-funded Care4Career project. The Family-Friendly Workplace Program is intended for supporting family friendliness, equality, diversity in the work community and non-discrimination. The programme is not limited to families with children only, instead adopting a broader family concept: family friendliness covers all stages of life. The Care4Career project also promotes gender equality, the work–family life balance, and family-friendly practices in working life. The project is implemented in cooperation between the Finnish Institute of Occupational Health, the Finnish Institute for Health and Welfare (THL) and Mothers in Business (MiB).

For the second time, the Pulssi personnel satisfaction survey 2025 asked the personnel about their experiences of how equality and non-discrimination

are realised at Fintraffic (“According to your assessment, how equal treatment and non-discrimination have been realised at Fintraffic”). On a scale of 1–5, this section was rated 4.0. In 2024 the score was 3.9, which indicates positive development.

Finnish privacy legislation prevents the employer from collecting information on belonging to a certain minority group. We have studied whether an anonymous survey such as the Pulssi survey would enable asking the respondents whether they belong to a minority group. This would be helpful in examining whether the experiences of employees belonging to different minority groups differs from those of the majority of employees. However, this idea was abandoned because the question was judged to be intrusive.

The Balentor-conducted annual personnel satisfaction survey includes a separate set of indicators for non-discrimination, enabling monitoring our degree of success in this area. Recent years have indicated a positive trend (2023: 3.34 → vs. 2024: 3.55 → vs. 2025: 3.66).

Practices

Fintraffic complies with the principle laid down in the Act on Co-operation within Undertakings (1333/2021), according to which the impacts of the employer's plans on the personnel are discussed in

the manner referred to in the Act on Co-operation within Undertakings before the decision is made. In accordance with the Act on Co-operation within Undertakings, the grounds, impacts, alternatives and schedules of the employer's plans are negotiated with either the workers' representative or, if there is no such representative, all employees affected by the change.

In potential change situations, the personnel are consulted as required by the Act on Co-operation within Undertakings, either through their representatives or directly. In accordance with the Act on Co-operation within Undertakings, the employer must consult the personnel, for example, when the employer considers measures which may lead to notice of termination, lay-off or reducing a contract of employment to a part-time contract of one or several employees on financial or productive grounds or to unilateral amendment of an essential condition of the employment contract. Any major changes in duties, working methods, arrangement of work and work premises, or arrangements in the regular working hours that affect the position of one or several employees considered by the employer that fall within the scope of the employer's power of management are also covered by the obligation to negotiate on changes. Depending on the matter, the negotiations may take more than three weeks. During them, the

personnel can express their views and concerns about the employer's plans. The views and opinions of the personnel are taken into account in decision-making as far as possible. The 2025 change negotiations are described in more detail below.

Resources

The resources allocated to co-operation are described in more detail in a later section. The Chief Human Resources Officer, HR Business Partners, employee relations managers and other business management staff engage in regular dialogue with staff representatives.

Target setting process

The targets set in alignment with the sustainability programme are based on the Fintraffic strategy programme, the HR department's action plan and discussions that have taken place in connection with the preparation of the sustainability programme. The targets set in accordance with the sustainability programme were reviewed with a cooperation group consisting of shop stewards and occupational safety and health representatives, and the workers' representatives had the opportunity to influence the target setting. It is also possible to share experiences and potential suggestions for improvements from the sustainability programme in the cooperation group.



Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)

Theme	2026 target	2030 target	Key actions
Ensuring personnel wellbeing and occupational safety	Concrete measures have been found to support the health of workers. Fintraffic personnel are doing better than in comparison companies. The workload experienced by the personnel has decreased. Mitigating the disadvantages of shift work.	Concrete measures have been found to support the health of employees, and their health has improved in proportion to population level data. Fintraffic personnel are doing better than in comparison companies.	<ul style="list-style-type: none"> • Extension or succession of the Fit For Future Fintraffic Programme • Support for staff clubs and staff activity • Workload management through project prioritisation • Assessing the results of the pilot study on arousal and deciding further action • Assessing the results of the pilot study on alertness carried out by Fintraffic Railway and deciding on further action
Strengthening equality and non-discrimination	Training has improved supervisor competence in DEI matters and in intervening in discrimination and harassment. Improving family friendliness at Fintraffic: Objectives and measures in alignment with the Family-Friendly Workplace Program set by the Family Federation of Finland Measures aligned with Fintraffic's age programme.	<p>The personnel estimated that non-discrimination and equality had developed favourably.</p> <p>The personnel feel that Fintraffic's family friendliness has improved measurably.</p> <p>The employees reported that they feel that Fintraffic offers solutions for reconciling different stages of life and work (young people, trainees, older people).</p>	<ul style="list-style-type: none"> • Supervisor training in DEI themes and intervention, highlighting these themes in corporate culture • Assessing the results of personnel surveys and deciding on measures • Measures in alignment with the Family-Friendly Workplace Program set by the Family Federation of Finland • Measures aligned with Fintraffic's age programme
Development of staff expertise	Fintraffic has a clear understanding of the organisation's competence related to key strategic themes. Skills surveys are used to prepare training offering. Development of the onboarding process. The preparation of learning paths is set to begin.	<p>Targeted training and certain recruitments have reduced bottlenecks in competence.</p> <p>In particular, there is a functional model for supporting career transitions across modes of transport, and staff competence is utilised across transport mode boundaries</p>	<ul style="list-style-type: none"> • Gap analysis based on competence mapping of workers in operational duties + plan for training/attaining competence/other measures required by the strategy (job rotations, etc.) • Development of the onboarding process • The preparation of learning paths is set to begin



Characteristics of the undertaking's employees (S1-6)

The grounds for fixed-term employment relationships include substitution for family leaves or

Average number of employees (persons)*	2025	2024
Men	901	907
Women	292	291
Total number of employees	1,193	1,198

* The number of employees is reported correspondingly in the appendices to the financial statements.

Types of employment 31 December 2025	Women (persons)	Men (persons)	Total
Number of employees	299	903	1,202
Number of permanent employees	279	874	1,153
Number of fixed-term employees	20	29	49
Number of employees working variable working hours *	7	31	38
Number of full-time employees	266	828	1,094
Number of part-time employees	26	44	70

* Including those invited to work if necessary.

holidays, the work being of project or seasonal nature, unestablished demand and the employee's own request. 76 per cent of part-time employment contracts are concluded at the employee's initiative.

Employee turnover	2025	2024
Employment has ended (persons)*	60	70
Employee turnover, %	4.99	5.85

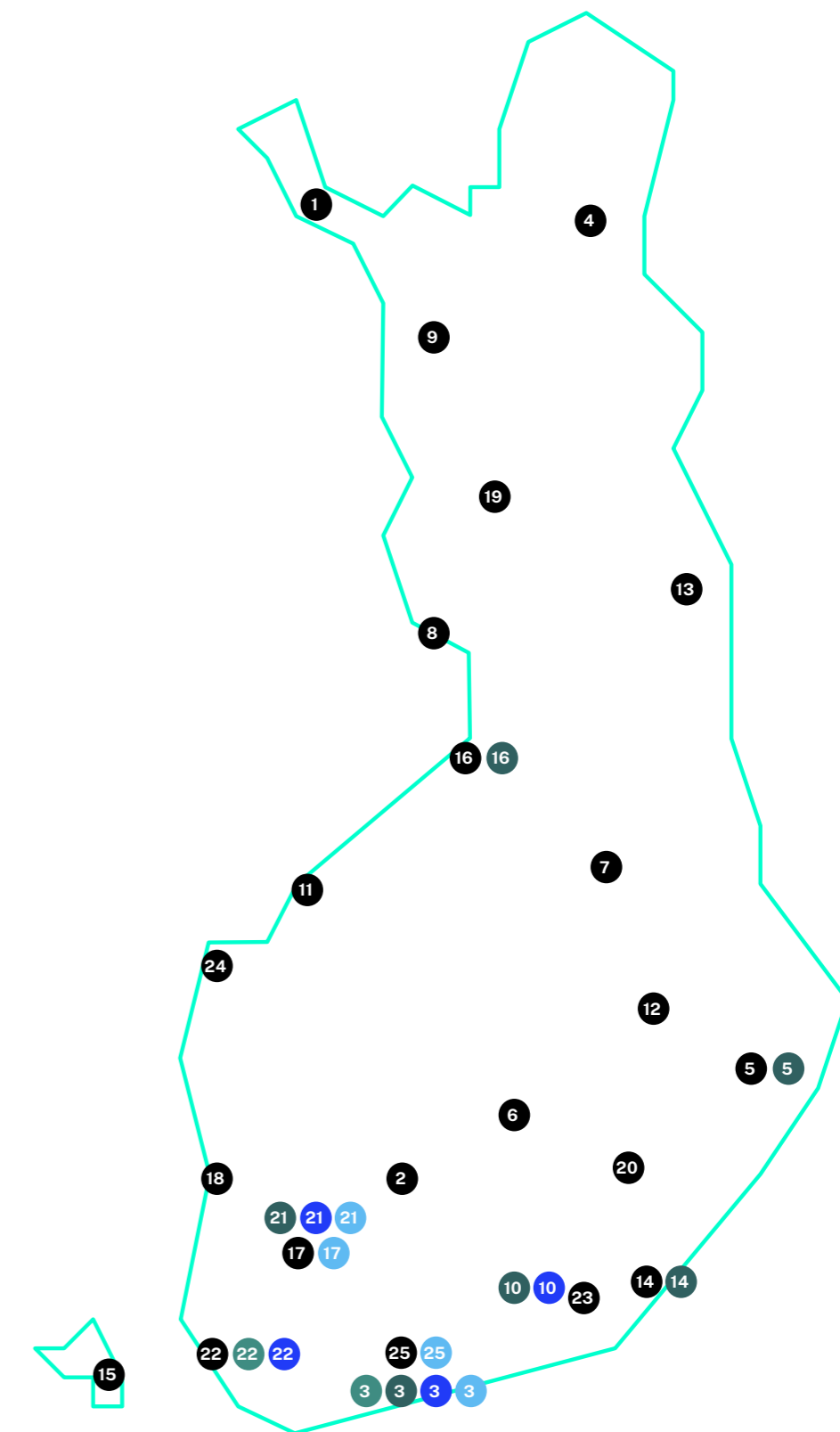
* The figure does not include terminations of employment due to the termination of a fixed-term employment relationship.

$$\text{Employee turnover rate, \%} = \frac{\text{Number of employees who left the company between Jan 1 and Dec 31}}{\text{Total number of employees on Dec 31}} \times 100$$

Business locations by company 31 December 2025

- 1 Enontekiö 1
- 2 Halli 1
- 3 Helsinki 372
- 4 Ivalo 5
- 5 Joensuu 4
- 6 Jyväskylä 11
- 7 Kajaani 4
- 8 Kemi 4
- 9 Kittilä 4
- 10 Kouvola 89
- 11 Kruunupyy 4
- 12 Kuopio 14
- 13 Kuusamo 3
- 14 Lappeenranta 3
- 15 Maarianhamina 3
- 16 Oulu 87
- 17 Pirkkala 17
- 18 Pori 5
- 19 Rovaniemi 16
- 20 Savonlinna 1
- 21 Tampere 154
- 22 Turku 78
- 23 Utti 3
- 24 Vaasa 6
- 25 Vantaa 313

- Fintraffic Air Navigation Services Ltd
- Fintraffic Vessel Traffic Services Ltd
- Fintraffic Railway Ltd
- Fintraffic Road Ltd
- Traffic Management Company Fintraffic Ltd





Collective bargaining coverage and social dialogue (S1-8)

The majority of Fintraffic employees (84 per cent) are covered by collective agreements. The majority of Fintraffic personnel, 28 per cent, are covered by the Collective Agreement for Customer Service, Traffic Management and Control and Administrative and Other Office Work (1 April 2025–31 March 2028) applied at Fintraffic Rail Traffic Management. This group is followed by the 16 per cent under the Collective Agreement for Fintraffic Air Navigation Services Ltd air traffic controllers (1 May 2024–30 April 2027). Fintraffic Air Navigation Services are affected by another broad Collective Agreement (27 March 2025–29 February 2028), which covers 11 per cent of the Group’s personnel. Ten per cent of the Group’s employees are covered by the collective agreement for the railway industry (valid until 31 March 2028). The majority of road traffic control personnel are covered by the collective agreement for Fintraffic Road Ltd (in force until 31 March 2028) and the majority of Vessel Traffic Services personnel are covered by the collective agreement for Fintraffic Vessel Traffic Services Ltd (valid until 31 March 2028), collectively making up a total of 17 per cent of the Group’s personnel. Approximately two per cent of the Group’s personnel are covered by the collective agreement for aeronautical technical personnel (valid until 28 February 2026). About 16 per cent of the

Group’s personnel are not covered by any collective agreements. Their terms and conditions of employment are specified in their employment contracts and in the policies and principles followed by their employer.

Coverage rate	Coverage of employment contract negotiations	Social dialogue
	Employees – EEA	Representation at the workplace
0–19%		
20–30%		
40–59%		
60–79%		
80–100%	Finland	Finland

Fintraffic does not have employees covered by collective agreements outside the EEA

Diversity metrics (S1-9)

There are four (40%) women and six (60%) men in Fintraffic top management.

Age distribution of employees 31 December 2025

Age group	Number of employees in age group (persons)	Share of employees of personnel (%)
Persons aged 30 or less	69	6%
Persons aged 30–50	698	58%
Persons aged over 50	435	36%

Adequate wages (S1-10)

The wages Fintraffic pays to all its employees meet at least the requirements of the Directive (EU) 2022/2041 of the European Parliament and of the Council. Employees covered by collective agreements are paid the wages specified in each collective agreement. Those outside the collective agreement are paid on the basis of the employment contract. The lowest wage paid to a full-time employee on the basis of an employment contract is 75 per cent of the gross median wage paid in Finland.

Training and skills development metrics (S1-13)

In 2025, a regular performance and career development assessment was carried out for 84% of employees.

Coverage rate	2025		2024	
	Women*	Men**	Women*	Men**
Performance and career development assessment	87%	89%	85%	84%
Number of training hours (hours)	7,011	28,690	6,758	22,661

* Percentage of female employees who have had a performance and career development assessment carried out.

** Percentage of male employees who have had a performance and career development assessment carried out.



Health and safety metrics (S1-14)

All Fintraffic personnel (100%) are covered by statutory occupational health care. The service is provided by Suomen Terveystalo Oy. The content of occupational health care is described in the procurement agreement and service description between Fintraffic and the service provider. In 2025, the number of fatalities due to occupational injuries and work-related health problems was zero.

Fintraffic personnel had 11 workplace accidents and 15 commuting accidents. Accidents at the workplace resulted in a total of 19 days of absence, for an accident frequency rate of 1.27 for 2025. These accidents mainly involved stumbles, falls and slips.

During the reporting period, Fintraffic had no cases of occupational diseases covered by the statutory accident insurance taken out by the employer, i.e. no working days were lost due to these reasons. Nor is Fintraffic aware of any such cases among employees in the value chain working in the company's other business locations.

Work-life balance metrics (S1-15)

All Fintraffic employees regardless of gender are entitled to use family leaves under the Employment Contracts Act and/or collective agreements.

Fintraffic offers both parents an opportunity to take paid family leave regardless of gender in accordance with collective agreements. The employer also applies the same principles to employees outside collective agreements

	2025		2024	
	Women*	Men**	Women*	Men**
Employees who have taken family leave	5.1%	6.1%	3.8%	4.9%

* Percentage of women, of all female employees, who have taken family leave during the reporting period.
 ** Percentage of men who have taken family leave during the reporting period of all male employees.

Compensation metrics (pay gap and total compensation) (S1-16)

	Traffic controllers	Other personnel	Not covered by collective agreement	All personnel
Road	1.02	1.04	N/A	0.86*
Air Navigation Services	0.99	0.92	0.75*	0.77
Vessel Traffic Services	1.13	1.01	N/A	1.02
Railway	1.00	0.96	1.14	1.02
Shared services	N/A	N/A	0.82**	0.82**
All	0.97	0.93	0.74*	0.92

The table shows the ratio of women's salaries to men's salaries.

* The difference in wages is explained by the fact that employees working in more demanding positions and in managerial and leadership positions are mainly men.
 ** In shared services, women and men perform different tasks. More men work in managerial positions, which affects the pay gap.

In the group 'Traffic controllers', women and men do very much the same work and there is hardly any gap in wages.

In the 'Other personnel' group, women and men perform a larger variety of tasks, which partly explains the differences.

	2025	2024
CEO's annual earnings, fixed portion	EUR 297,487	EUR 298,680
CEO's annual earnings, variable portion	EUR 51,584	EUR 45,788
Total	EUR 349,071	EUR 344,468
Average annual earnings of personnel, fixed portion	EUR 74,005	EUR 70,764
Average annual earnings of personnel, variable portion	EUR 2,472	EUR 2,075
Total	EUR 76,477	EUR 72,839
Pay ratio between the personnel and CEO	1:4.6	1:4.7



Incidents, complaints and severe human rights impacts (S1-17)

During the reporting period, Fintraffic settled a legal dispute in the Helsinki District Court concerning a male employee's claim for discrimination on the basis of family care obligations. Air Navigation Services has a pending dispute concerning lay-offs during the coronavirus pandemic. The employees considered that, based on discriminatory grounds, the lay-offs were targeted to a larger number of employees only performing air traffic control work than to employees who also had supervisory duties. While the District Court relieved the employer of blame, this judgment is not legally valid, with the claimants having appealed the matter to the Court of Appeal. Three people reported having experienced sexual or gender-based harassment and two people reported having experienced harassment in the form of racist or chauvinistic speech.



S3 Affected communities

The materiality analysis highlighted the societal impact of Fintraffic, i.e., the benefits generated for the transport ecosystem and users. The communities affected by Fintraffic's services are described in the general section of this report, labelled SBM2.

At the core of Fintraffic's strategy is societal impact, which aims to reduce the negative impacts from transport experienced by stakeholders (e.g. accidents and emissions) and to increase positive impacts (e.g. saved travel time and costs).

Fintraffic has considered affected key communities in its own activities and associated reports.

Fintraffic's vision is the safest, smoothest and most environmentally friendly traffic in the world, which is pursued through not only Fintraffic's own services but also close stakeholder cooperation.

Fintraffic's own business locations in different parts of Finland are control rooms comparable to office spaces, which do not cause material impacts on the local environment. Traffic management services enable maintaining the kind of rail, air, road and

maritime traffic as it is today. Services have a major impact on the regional economy, the accessibility of regions, the mobility of labour and goods, and national and regional competitiveness. Traffic management, digital services and open data help significantly reduce the harmful impacts of traffic by means such as:

- accelerating the development of new travel and logistics services through digitalisation and a common set of rules and accelerated practices for the sector;
- maintaining and sharing a real-time situational picture of traffic, open data;
- optimising routes and speeds to combat congestion and reduce emissions through traffic management services;
- improving the flow of information between operators to prevent and resolve disruptions;
- increased traffic system efficiency through automation;
- making investments in traffic routes and using data to optimise their use and maintenance;
- increasing the attractiveness of public transport, for example, by reducing the impacts of disruptions and building more uniform datasets for the use of public transport operators;
- sharing data and providing traffic management services to support effective action by the authorities.



In addition to providing traffic management services, Fintraffic has a social impact on land, at sea and in the air by promoting the interoperability of transport modes and the operation of the transport system as a whole in many ways. We work with a variety of other operators to build a data ecosystem that is open to everyone in the traffic sector. Enhanced utilisation of data within this ecosystem advances the development of new services. The traffic data ecosystem coordinated by Fintraffic aims to provide competitive and scalable transport and mobility services for both Finnish and international markets – solutions that will enable safe, low-emission and user-oriented travel and logistics chains that combine different modes of transport. Above all, Fintraffic facilitates the business operations of other parties.

Based on EU Commission reports, the data economy already generates value counted in hundreds of millions of euros in the traffic sector in Finland. A report prepared by Fintraffic and the consultancy firm FLOU in 2023 and updated in 2024 assessed Fintraffic's share of the transport data economy.

The data ecosystem generates direct benefits for the business operations of companies operating in the traffic sector, but also indirect impacts at the societal level. Traffic data has helped develop services for different actors that have benefited companies and increased people's wellbeing. By making information openly available and combining real-time

data, it is possible to optimise the mobility of people and goods to a new level. The port app developed by Fintraffic is a good example of a digital service that promotes traffic functionality. Data is shared with a variety of operators, who can then use it to optimise the speeds of ships and trucks. The publicly released Fintraffic Sky application enables an improved situational picture of drone traffic in low airspace. A more accurate situational picture and data use improve the efficiency of logistics, which has a major impact on costs for companies and consumers alike.

The collected and processed data may originate from Fintraffic's own sources and its partner network – or vice versa. Crowdsourcing enables us to harness data produced by transport users and increasingly smart vehicles. In rail traffic, track capacity can be significantly increased with the aid of new train control systems (the Digirail project), which is a good example of the possibilities of digitalisation in rail traffic. Several digitalisation-based development projects are also underway in other modes of transport, and they will pave the way for optimising the entire traffic ecosystem. They include improving information exchange in road traffic management, creating a situational picture of Finland's lower airspace, introducing digital consignment notes, and providing a maritime traffic notification service.

In 2024, Fintraffic established the Traffic Data Service Cluster to promote the export of transport

data services. The aim is to promote the international business of companies operating in Finland.

Fintraffic is committed to operating efficiently. It has an internal efficiency programme, and it has set financial objectives arising from EU regulation in some of its business operations. These ensure that the services ordered by public organisations and commercial air transport from the company are provided cost-efficiently.

Policies related to affected communities (S3-1)

Fintraffic has defined operating principles that guide sustainability actions towards affected communities. The policies have been discussed in the company's sustainability programme and include:

1. promoting safe, smooth and environmentally friendly traffic;
2. ensuring societal preparedness and reliable transport services;
3. enabling economically efficient traffic;
4. smooth cooperation between traffic sector operators;
5. promoting the growth of the data economy, markets and exports in the traffic sector.

The essential impacts, key risks and opportunities concerning the communities affected by our services have been identified in a double materiality analysis

based on the principles of the company's risk management process.

Sustainability has been integrated as a key part of Fintraffic's strategy, business activities and other decision-making. Every year, we update the key sustainability impacts, risks and opportunities of our operations. We manage sustainability-related risks as part of our risk management system. We monitor compliance with and implementation of sustainability requirements and initiate remedies if necessary.

Fintraffic has assigned persons responsible for key stakeholders in the Group Management Team. The person responsible coordinates Fintraffic's engagement with the stakeholder in question, determines the development policies and key measures related to the stakeholder and ensures that any negative impacts on the stakeholder's business operations are addressed and the remedies adopted based on them are implemented. The task of the stakeholder engagement officer is to sound the expectations of the stakeholder in question and to bring the expectations, opportunities and risks related to the stakeholder into the Group's strategy process and the double materiality analysis. In addition to engaging closely with the stakeholders, changes in stakeholder activities are monitored by means of media and online monitoring tools and surveys. Fintraffic has a whistleblowing channel.



Fintraffic has defined its key stakeholders as part of its Sustainability Programme updated in December 2025.

Fintraffic’s key stakeholders are the customers (clients and public-sector partners, end-user customers, application developers and data users), the owner, personnel, ministries, research community, industrial policy interest groups, counties and municipalities, politicians and the media. The above-mentioned policies cover all affected communities.

We operate in compliance with internationally recognised human rights declarations and national rules. For more information on the topic, see section S1-1. In accordance with the sustainability policy approved by Fintraffic’s Board of Directors in December 2024, we comply with the EU’s sustainability regulation and the guidelines set for state-owned companies by the owner. The UN Global Compact principles guide our operations. We apply the Finnish Corporate Governance Code of the Securities Markets Association and the OECD Principles of Corporate Governance. We respect the key human rights declarations, such as the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

Expectations and management methods of key stakeholders

Stakeholder	Stakeholder expectations	Management measures	Communication
Customers: Authorities, businesses and organisations, app developers and data users, the public	<ul style="list-style-type: none"> • Maintaining the high level of security, reliability and efficiency of services • World-class expertise and quality in traffic control, data and digital services • Promoting safe, smooth and environmentally friendly traffic • Promoting effective travel and transport chains and transport services • Supporting the business of sector operators, market growth • Supporting the authorities 	<ul style="list-style-type: none"> • Continuous development of the high quality, coverage and reliability of services and data • Continuous communication, clear customer relationship management models • Customer satisfaction surveys and corporate image survey • Improving customer understanding • Investments in the operational reliability of service provision 	Ongoing
Ministry of Transport and Communications	<ul style="list-style-type: none"> • Promotion of the Transport 12 Plan • Compliance with the Resolution on the State Ownership Policy • Compliance with the ownership strategy • Producing impact benefits 	<ul style="list-style-type: none"> • Ensuring the implementation of Fintraffic strategy • Continuous communication • Close cooperation with sector stakeholders 	Ongoing
Personnel	<ul style="list-style-type: none"> • Meaningful work • Fair pay and competitive employee benefits • High-quality supervisory work • Hybrid work, appropriate and high-quality tools • Good corporate culture • Competence development and maintaining labour-market competency 	<ul style="list-style-type: none"> • Close and transparent contact with trade unions • Remuneration systems and benefits • Development of supervisory tools and training • Development of culture and competence • Surveys 	Ongoing
Research community and education	<ul style="list-style-type: none"> • Promoting science and sharing research data, promoting cooperation • Need for internships or theses • Influencing the knowledge-based development of the traffic system 	<ul style="list-style-type: none"> • Participation in research projects • Increasing visibility at educational institutions • Provision of internships 	As necessary
Industrial policy interest groups	<ul style="list-style-type: none"> • Open and active dialogue • Promotion of shared interests 	<ul style="list-style-type: none"> • Exchanging information within sector forums in Finland and abroad • Active participation on selected organisations 	As necessary
Municipalities and counties	<ul style="list-style-type: none"> • Integration of national and local traffic data • Ensuring smooth cooperation • Development of accessibility 	<ul style="list-style-type: none"> • Dialogue with municipalities and counties • Leveraging digitalisation and offering solutions • Services for the whole country 	Ongoing
Politicians	<ul style="list-style-type: none"> • Promoting a safe, smooth and environmentally friendly traffic system • Compliance with regulations and statutory requirements • Transparent and efficient operation, comprehensive reporting • Providing data in support of decision-making 	<ul style="list-style-type: none"> • Provision of world-class traffic management, digital services and data • Ensuring the reliability of traffic control and management • Compliance with regulations and statutory requirements • Close cooperation with political actors; creation of data 	As necessary
Media	<ul style="list-style-type: none"> • Active sharing of data • Interesting content 	<ul style="list-style-type: none"> • Continuous communication via various channels • Background meetings • Media service 	As necessary



Fintraffic provides services in Finland. We operate in compliance with internationally recognised human rights declarations and national rules. Fintraffic is not aware of any cases in which our operations would in any way conflict with the UN or ILO principles.

Fintraffic has a Code of Conduct that it follows in its business operations. This Code of Conduct is detailed in section G.

Processes for engaging with affected communities about impacts (S3-2)

Practices for engaging with affected communities are described in the general section of ESRS and in SBM2 and SBM3 of S3.

Identifying impacts:

Material impacts, risks and opportunities affect different communities in the transport ecosystem, such as users, transport operators and society at large. They have been identified through a double materiality analysis and data collected from stakeholders.

Application of the principles:

Sustainability is integrated into Fintraffic strategy and business operations. Our stakeholder engagement officers coordinate contacts with stakeholders, bring their expectations and concerns to the Group's strategic planning and assess their impact on the business. The task of the stakeholder engagement

officer is to sound the expectations of the stakeholder in question and to bring the expectations, opportunities and risks related to the stakeholder into the Group's strategy process, operations planning and the double materiality analysis. In addition to engaging closely with the stakeholders, changes in stakeholder activities are monitored by means of media and online monitoring tools and surveys. Fintraffic has a whistleblowing channel, which can be found both on the company's intranet and external websites.

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Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3)

Fintraffic's processes to remediate negative impacts and address concerns raised by affected communities include:

1. Remediating grievances:

The company has a whistleblowing channel through which stakeholders can raise their concerns. Each report is processed in accordance with the specified policy, but the monitoring of the effectiveness of follow-up measures has yet to be systematised.

2. Accessibility of channels:

The whistleblowing channel is available on both internal and external websites. The instructions and procedures related to the channel are public, and the channel is designed to be safe and to protect against retaliation.

3. User trust and participation:

Fintraffic regularly assesses whether potential users of the channel are aware of its existence and whether they trust it. There are also plans to develop mechanisms for ensuring its efficiency.

Taking action on material impacts on affected communities, and approaches to managing material risks related to affected communities (S3-4)

Sustainability is integrated into Fintraffic's strategy and business operations. Every year, we update the key impacts, risks and opportunities of our business operations (double materiality analysis). We manage risks as part of our risk management system. The double materiality analysis will be integrated into the risk management system. This means that the risks posed by Fintraffic's operations to stakeholders and the risks posed by the activities of stakeholders to Fintraffic will be examined as part of the risk management process.

Our responsibility is divided into the responsibility for the environment (E), responsibility for people and

communities (S) and responsibility for good governance (G). The objectives, measures and metrics related to these themes and responsibilities for the management of corporate responsibility are described in Fintraffic's Sustainability Programme document. The implementation of the Sustainability Programme measures is monitored in conjunction with the implementation of strategy and reported to the Board of Directors.

Our responsibility for the environment focuses on reducing greenhouse gas emissions in our operations and procurement. Our responsibility for people and communities focuses on ensuring a healthy, equal and competent personnel, promoting a safe workplace, promoting safe, smooth and environmentally friendly traffic, providing reliable and efficient services, and accelerating smooth cooperation between traffic sector actors, the growing data economy and developing services.

The impacts of Fintraffic's services can be divided into direct and indirect impacts. Fintraffic monitors the impacts of its services on its stakeholders as part of monitoring the implementation of the strategy and the sustainability programme and by continuously developing its impact metrics, which are described in more detail in the company's annual report. In addition, the company sounds stakeholders' expectations of Fintraffic as part of its stakeholder activities.



As a state-owned company, Fintraffic emphasises openness in its operations. Our sustainability policy outlines: we promote trust, openness and responsible practices in all our partnerships.

Fintraffic’s sustainability programme is based on a double materiality analysis. The sustainability programme defines the measures that are planned and being implemented to mitigate the risks and to pursue the opportunities in relation to stakeholders. The key measures are listed for each area.

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S3-5)

In its sustainability programme, Fintraffic has defined objectives, measures and metrics based on a double materiality analysis for its key areas of responsibility. Deadlines have been set for the actions. The measures will reduce negative impacts on affected entities and drive positive impacts.

Theme	2026 target	2030 target	Key actions
Promoting safe, smooth and environmentally friendly traffic	Data-driven transport system development and facilitating development of traffic control as per strategy	World-class traffic control services and digital traffic system development accelerate Finland towards the forefront of safe, smooth and low-emissions traffic and logistic systems	<ul style="list-style-type: none"> • MROT, FINEST, Airspace2027 • Driving the Digirail project and the renewal of traffic control (ATLAS) • Digiroad, development of lifecycle management, data-driven leadership • Future VTS, eVäylä • Digital consignment notes, development of a digital twin, use of data analytics and artificial intelligence • Data-driven transport system development
Ensuring societal preparedness and reliable transport services	Ensuring social preparedness and reliable transport services and implementing related plans	Ensuring societal preparedness and reliable transport services	<ul style="list-style-type: none"> • Preparedness measures for different modes of transport (Strategy 2025-2030)
Enabling cost-effective traffic	Implementation of efficiency targets for the group and aviation, enhancing service development in the sector through digital ecosystem services	World-class traffic control services and digital ecosystem services improve traffic flows and support commercial actors in the sector in developing efficient solutions.	<ul style="list-style-type: none"> • Development of traffic control services as per strategy • Development of digital ecosystem services • Development of a digital twin • Digital consignment notes & travel information development
Accelerating smooth cooperation among transport sector operators, increasing the data economy market and exports	Increasing the impact of the transport data ecosystem and export cluster	Fintraffic is the most important & most popular provider of traffic data in Finland, compiling a situational picture for the traffic system.	<ul style="list-style-type: none"> • Development of traffic control services as per strategy • EU digital consignment notes • Ecosystem & export cluster • Municipal data integrated in NAP • Development of a digital twin • Traffic data analytics and utilisation of artificial intelligence



S4 Consumers and end-users

Policies related to consumers and end-users (S4-1)

Fintraffic's policies affecting consumers and end-users are based on the Code of Conduct, Supplier Code of Conduct and management systems adopted by the company's Board of Directors.

The aim of these policies is to promote human rights and strengthen ethical practices. The policies cover all consumer and end-user groups. Fintraffic's strategy aims to provide safe, smooth and environmentally friendly traffic services that directly benefit end-users.

At the core of Fintraffic's strategy is societal impact, which aims to reduce the negative impacts from transport experienced by consumers and end-users (e.g. accidents, emissions) and to increase positive impacts (e.g. saved travel time and costs).

Fintraffic's own business locations in different parts of Finland are control rooms comparable to office spaces, which do not cause material impacts on the local environment. Traffic management services

enable maintaining the kind of rail, air, road and maritime traffic as it is today.

Services help significantly reduce the harmful impacts of traffic by means such as:

- accelerating the development of new travel and logistics services through digitalisation and a common set of rules and practices for the sector;
- maintaining and sharing a real-time situational picture of traffic;
- optimising routes and speeds to combat congestion and reduce emissions through traffic management services;
- improving the flow of information to consumers to prevent disruptions;
- enhancing the attractiveness of public transport, including by reducing the impact of disruptions.

Fintraffic has a Code of Conduct that it follows in its business operations. This Code of Conduct is detailed in section G.

**Communication on policies**

Engagement with people in Fintraffic's own workforce is discussed in more detail in section S4-2.

Development of the operating model

By 2026, Fintraffic intends to develop processes for managing the material impacts, risks and opportunities related to consumers and end-users. The operating model will include methods for assessing the effectiveness of the policies.

Fintraffic supports the principles of the UN Global Compact on the environment, labour rights, human rights and anti-corruption.

Processes for engaging with consumers and end-users (S4-2)

Fintraffic currently has no general processes that cover all consumer and end-user groups. Fintraffic has a digital service management and development process for end-users' digital services.

Planned measures for 2026:

- Creating a comprehensive operating model for communications.
- Using existing solutions, such as the Feedback Channel and the whistleblowing channel, as the basis for the process.

Processes to remediate negative impacts and channels to address concerns of consumers and end-user (S4-3)

Current solutions such as the Feedback Channel (<https://www.palautevayla.fi/aspa/en>) and the whistleblowing channel provide mechanisms to address consumer and end-user concerns. The Feedback Channel is a nationwide advisory service for roads, railways and waterways, provided by Fintraffic in collaboration with the Finnish Transport Infrastructure Agency and regional Centres for Economic Development, Transport and the Environment. The service is intended for all users of state-owned transport routes.

On the Feedback Channel website, the public can give feedback, ask questions and give development proposals and submit notifications related to state-level routes. The page also allows people to follow feedback and notifications concerning their own area. If the feedback is related to the maintenance of roads maintained by the municipality (e.g. streets), people must contact the municipality or city concerned. Additional information on the whistleblowing channel is given in section G1-1.

However, these mechanisms do not constitute a comprehensive operating model.

Development targets for 2026:

- to build a comprehensive operating model to remediate negative impacts;
- to include efficiency monitoring and reporting in the mechanisms.

Actions in relation to material risks and opportunities (S4-4)

Fintraffic does not yet have a systematic process for managing risks in relation to consumers and end-users and pursuing the opportunities.

Development targets for 2026:

- creating an operating model for managing essential risks and opportunities so that the operating model can be used for future regular assessment of the effectiveness of risk management measures.

Targets related to managing material negative impacts and advancing positive impacts (S4-5)

Fintraffic currently has no defined targets related to managing negative impacts, advancing positive impacts, and managing material risks and opportunities.

Development targets for 2026:

- defining these objectives and developing supporting processes as part of the 2026 operating model.

Conclusions and outlook

Fintraffic is committed to improving the consideration of consumers and end-users in its sustainability action. Future measures will focus on building comprehensive processes that:

- manage consumer and end-user-related risks and opportunities
- remediate negative impacts and advance positive impacts
- improve communication and cooperation with consumers and end-users.



Theme	2026 target	2030 target	Key actions
Prevention of hazards, reducing travel times and preventing congestion, reducing emissions from traffic	Promotion of strategic traffic management and digital ecosystem services projects as planned	World-class traffic management services and digital ecosystem services accelerate Finland towards the forefront of safe, smooth and low-emissions traffic and logistic systems. Fintraffic traffic services for consumers are the most popular in Finland	<ul style="list-style-type: none"> • MROT, FINEST, Airspace2027 • Driving the Digirail project and the renewal of traffic control (ATLAS) • Digiroad, development of lifecycle management, data-driven leadership • Future VTS, eVäylä • Digital consignment notes, development of a digital twin, use of data analytics and artificial intelligence • Data-driven transport system development • Development of traffic knowledge base and situational picture services
Minimising disruptions caused by traffic control services	Ensuring social preparedness and reliable transport services and implementing related plans	Ensuring societal preparedness and reliable transport services	<ul style="list-style-type: none"> • Preparedness measures for different modes of transport (Strategy 2025-2030)
Improving the operating conditions of public transport	Development of travel information, development of ecosystem work and cooperation among sector operators	World-class traffic ecosystem services improve traffic flows and support commercial actors in the sector in developing efficient and customer-friendly solutions Finnish public transport information services are among the most advanced in the world	<ul style="list-style-type: none"> • Developing digital mobility services • Collecting healthcare and social welfare-related travel data • Traffic data ecosystem operations
Promoting new, innovative and cost-effective traffic services	Increasing the impact of the transport data ecosystem, developing the traffic knowledge base and promoting the accessibility of transport services (accessibility information)	The world-class Finnish transport data ecosystem enables the most efficient service development	<ul style="list-style-type: none"> • Traffic data ecosystem operations • Fintraffic's data services • Development of travel information, including accessibility information • Export cluster operations



G1 Business conduct

Management, metrics and targets of impacts, risks and opportunities (ESRS 2 IRO-1)

Risks are mapped for each organisation by business, service and function, covering all 43 business locations. Currently, the risks and opportunities are assessed based on risk lists created by the authorities and Fintraffic itself, information based on experience, and observations made by customers and partners. Reporting to Fintraffic's Management Team and Board of Directors is carried out twice a year in accordance with the requirements of the corporate governance model. A more detailed and systematic operating model has been introduced for collecting and processing risks and for reporting, and a risk survey was conducted in February 2025 in accordance with the new model. The resulting mapping and reporting will be developed according to changes in regulation, requirements, feedback and lessons learned.

Business conduct policies and corporate culture (G1-1)

To ensure the group's unity, the whole Fintraffic Group follows a common management system. The decision-making and management of the Group comply with the Limited Liability Companies Act, Fintraffic's Articles of Association and the common guidelines and principles defined in these Rules of Procedure.

Since its establishment, Fintraffic has followed ethical guidelines approved by the Board of Directors and last updated at the end of 2025.

Fintraffic has set policies, such as procurement policy, sustainability policy, risk management policy and safety policy, to guide its operations.

In 2024, Fintraffic launched a project to develop its corporate culture in accordance with the strategy programme. The project aims at establishing a uniform corporate culture and promotes commitment to it. The project includes several programmes that strengthen our corporate culture, the most significant result of which is our corporate culture manual which was completed at the end of 2025. Its preparation involved 27 cultural cafés across Finland to collect staff perspectives on both the development of corporate culture as well as the content, topics of emphasis and layout of the handbook.



Whistleblowing channel

To remediate negative impacts and address community concerns, Fintraffic has a whistleblowing channel in place through which employees and external stakeholders can raise their concerns. Every report is processed in accordance with the procedure laid down by law.

The whistleblowing channel is available on both internal and external websites. The instructions and procedures related to the channel are public, and the channel is designed to be safe and protected against retaliation.

Fintraffic regularly assesses whether potential users of the channel are aware of the channel and whether they trust it. The Code of Conduct prohibits any retaliatory action against whistleblowers. Information on the whistleblowing channel is available on internal and external websites.

The operating principle, guidelines and training related to the whistleblowing channel will be developed in 2026.

A total of 38 incidents have been reported to Fintraffic through the whistleblowing channel during its existence. The incidents have not been related to misconduct but have mainly concerned inappropriate behaviour.

Cost efficiency

One of Fintraffic's key sustainability targets is to continuously improve the company's cost-efficiency. The benefits from streamlining generated by rail and road traffic management and vessel traffic services are passed in full by Fintraffic to the Finnish Transport Infrastructure Agency, which receives the services it needs at a lower unit cost. In air navigation services, the efforts to improve efficiency are linked to the performance plans drawn up in accordance with EU regulations, through which all air traffic operators can enjoy the benefits of enhanced efficiency. In summer 2025, the European Commission confirmed the efficiency targets laid out in the RP4 performance plan for the next five-year period 2025–2029.

Fintraffic aims for a EUR 30 million increase in operational efficiency in the provision of road, rail and maritime traffic management services between 2023 and 2028. In 2023–2025, Fintraffic verified a cumulative efficiency improvement of EUR 15 million through increased automation, more efficient traffic management services and cost-effective procurement. Efficiency has also been improved by leveraging the economies of scale, as the company has been able to provide more extensive service packages without the costs having risen in the same proportion. Long-term asset management has improved efficiency as well.

Traffic volume developments for Air Navigation Services have not aligned with the RP4 performance plan. In addition to the sanctions imposed due to the Russian invasion of Ukraine, the reduced use of Finnish airspace by Chinese airlines has had a significant impact on flight volumes compared to what is specified in the performance plan. Consequently, the targets 2025 were not met in terms of unit cost development. However, the actual costs were below the costs specified in the performance plan.

Management of supplier relations (G1-2)

Fintraffic procures significant amounts of goods and services. Our procurements are governed by procurement legislation (the Act on Public Procurement or the Act on Public Procurement in Special Sectors, depending on the business operations), the Group's procurement action plan and procurement policy. In addition to procurement legislation, responsibility in procurements is driven by means of ethical guidelines and the Code of Conduct introduced in 2025. The latter two will be incorporated into Fintraffic procurement agreements. Fintraffic has defined procurements of the most significant low-carbon potential and set low-carbon measures for these procurements. In addition, common minimum responsibility requirements have been set for each primary procurement category.

Competitive tendering processes include set requirements, and contract terms may include provision for internal audits to prevent abuse. Suppliers must comply with legislation, human rights and sustainability principles and confirm that they are not subject to international sanctions.

The Fintraffic procurement action plan and internal guidelines define the responsibility considerations and operating methods for the procurement. Our suppliers are required to comply with legislation, regulations, good trading practices, sustainable development principles and responsible practices. Fintraffic procurement practices are developed according to objectives. This ensures attention to and applicability of the spectrum of responsibility considerations in all service agreements as specified for the procurement package. Fintraffic-laid supplier relations are based on trust and transparency. We strive for continuous and open dialogue with our suppliers, both before and during tendering for procurement. Fintraffic has identified the most strategically important suppliers and engages in active dialogue with these suppliers.

Staff participating in Fintraffic procurements receive regular training on the procurement process, and the key trainings are mandatory for the persons responsible. Thanks to this procurement training for staff, Fintraffic is able to ensure that sustainable development goals are considered in procurements



and that only suppliers who meet the given requirements are selected. This improves the longevity of supplier relationships. A large proportion of the goods, services and other goods procured by Fintraffic are supplied by Finnish suppliers, in Finland. Fintraffic procurement policy includes a defined equality and non-discrimination principle both in the selection of suppliers and during cooperation.

Fintraffic defines the terms of payment in its procurement contracts and other orders. For recurring invoicing, the terms of payment are commonly 21 or 30 days, with longer payment periods only allowed as exceptions. Advance payments are possible as well, as per the given terms. All payments are made on time and as per the agreed terms of payment.

Fintraffic takes comprehensively checks compliance with the obligations set in the Act on the Contractor's Obligations and Liability when Work is Contracted Out. This compliance is checked for all new suppliers, even in cases where the contract falls outside the scope of the Act. The aim is for all Fintraffic procurement contracts to be made with responsible suppliers able to demonstrate compliance with these obligations.

Prevention and detection of corruption and bribery (G1-3)

Since its establishment, Fintraffic has had its own Code of Conduct. According to the Code, the company has zero tolerance for corruption. Fintraffic has adopted an anti-corruption guideline that includes internal anti-corruption and anti-abuse measures.

Anti-corruption training will be developed in 2026.

Confirmed incidents of corruption or bribery (G1-4)

11 reports were submitted via the whistleblowing channel in 2025. No suspected or confirmed cases of corruption or bribery were reported to Fintraffic during the 2025 reporting period, nor were there any convictions or fines for violations of anti-corruption and anti-bribery laws. All reports submitted through the whistleblowing channel are reported to the Audit Committee at an anonymised aggregate level.

Political influence and lobbying activities (G1-5)

Fintraffic provides its expertise to decision-makers, thus aiming to improve the quality of public decision-making. The company does not provide any financial support to political parties and, in accordance with its

Code of Conduct, does not otherwise support political parties or other organisations or persons belonging to the political system.

During the financial year 2025, Fintraffic promoted the development of regulations related to traffic management and traffic data and provided information and views on the promotion of projects related to the same themes.

Fintraffic complies with the legislation related to the Transparency Register and reports on its lobbying activities to the reporting system maintained by an authority (National Audit Office of Finland) twice a year. Fintraffic and its managing directors are responsible for supervising the company's lobbying activities.



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