Elisa Environmental Policy

Contents

1 PURPOSE AND SCOPE

The *Elisa Environmental Policy* ("Policy") supports Elisa's mission of *A Sustainable Future Through Digitalisation*, which from a climate impact point of view means reducing GHG emissions in operations of both Elisa and value chain stakeholders, according to Elisa's Climate Transition Plan, with targets.

In this version 1.7 of the Policy, Elisa reaffirms its commitment to using 100% renewable electricity and expands descriptions of sustainable procurement criteria and reporting expectations for suppliers.

1.1 Purpose of the policy

This Policy specifies further the principles and standards constituted in the *Elisa Code of Conduct*. It describes how we comply with environmental legislation and regulations in Elisa's operations, and how we commit to reducing negative environmental impact in our operations. It offers guidance on responsible conduct and sets commitments and an approach for reaching environmental sustainability and climate change related targets within Elisa's global business environment. This Policy thus provides a solid, obligatory, and broad foundation for the *Elisa Environmental Management System*, which describes further how we identify and address Elisa's potential or actual environmental impacts.

1.2 Scope and applicability

This Policy aligns with best practices in sustainability reporting and management system standards, considering for example our recurring double materiality assessments, which might affect the scope.

Environmental issues might impact Elisa's different units and functions differently, but this Policy is applicable in all Elisa Group companies. Elisa commits to comply with all applicable environmental laws and regulations. Elisa may operate in countries with more stringent environment laws or regulations. In such cases, provisions of locally applicable laws override the principles of this Policy.

This Policy is applicable to every employee, director, and officer within the Elisa group of companies and its affiliates. This Policy also applies to all third parties acting on behalf of Elisa. We also require our suppliers, subcontractors, and external partners to comply with similar principles as the above.

1.3 Approval

This Policy is upkept by the *Elisa Corporate Responsibility Team* and approved by the *Elisa Corporate Responsibility Management Board*, while the *Elisa Corporate Executive Board* is informed of changes.

2 ROLES AND RESPONSIBILITIES

Our commitment to sustainability and environmental responsibility, means that every Elisa employee should keep in mind the wellbeing of the environment and choose environmentally friendly options.

2.1 Responsibility for compliance

All employees, directors and officers within Elisa Group are responsible for complying with applicable legislation, Elisa's Code of Conduct, this Policy, as well as any other applicable Elisa Group policies, guidelines, management systems and instructions given from time to time, depending on their roles.

Suppliers must follow Elisa's Code of Ethical Purchasing and other company-specific requirements. Competitive bidding is fair, transparent, and based on set criteria. Relevant sustainability factors may include energy and material efficiency, life cycle costs, and reduced social and environmental impacts. We expect Elisa's suppliers and their subcontractors to promote responsible use of limited resources, reduce harmful environmental emissions, including support for the Paris Agreement's 1.5°C target, and uphold human rights and fundamental labour principles throughout the supply chain. We also expect verifiable sustainability actions with related targets and reporting for products and services.

2.2 Reporting actual or suspected violations

It is the responsibility and obligation of each employee to report any suspected or actual violations of this Policy or applicable environmental laws to their manager, *Internal Audit*, their *Local Legal Counsel*, *Elisa Group Legal* or *Elisa Corporate Responsibility* function. Actual or suspected violations can also be reported anonymously via Elisa's *Whistleblowing channel*, available at Elisa's website. All whistleblowing channel reports will be managed in accordance with Elisa's whistleblowing principles.

Suppliers and their subcontractors are also encouraged to report any suspected or actual violations.

Persons who, acting in good faith, report potential violations or who provide information or otherwise assist in any inquiry or investigation of potential violations, will be protected against any retaliation.

2.3 Management responsibilities

Managers are responsible for ensuring that their teams and functions are compliant with this Policy and for monitoring this. These managers are furthermore themselves expected to set a good example.

2.4 Information disclosure obligations

Elisa by law has an obligation to disclose information on operations and management of social and environmental issues, to support stakeholders in evaluating the non-financial performance of Elisa.

Elisa follows the principles and reporting recommendations of the *CSRD*, *GRI* and *SASB* frameworks.

We report to the *EU Sustainable Finance Taxonomy* classification system, where business activities of Elisa that can be considered environmentally sustainable are transparently defined and measured.

The Elisa Corporate Responsibility function is responsible for coordinating, facilitating, and managing environmental information disclosures, but depend on colleagues across the organisation for data.

3 GENERAL PRINCIPLES

By acting in sustainable ways and developing enabling solutions, we can obtain significant reduction of both our own and our customers' carbon footprint. We continuously develop our operations, and we can provide digital services that also enable society to become more environmentally sustainable.

3.1 Commitments

Elisa is since 2015 a signatory to the *UN Global Compact* initiative, through which we commit to adapt, support, and implement sustainability principles of the UN and regularly report on related operations.

As a public company, Elisa is committed to regularly providing stakeholders and interested parties with non-financial information on our progress, both through recurring reports and specific requests.

Responsibility is one of Elisa's company values. Elisa is actively involved in creating a carbon neutral society, where *information and communications technology* (*ICT*) solutions play an enablement role.

In *environmental sustainability* we have a strategic focus on *climate change* and *resource efficiency*.

Elisa has science-based climate targets, approved by the *Science Based Targets initiative* (*SBTi*):

Climate commitments and targets, aligned with the 1.5°C goal of the Paris Agreement	
Science Based Near-term Climate Target	Elisa Corporation is committed to reducing absolute scope 1, 2 and 3 GHG emissions by 42% by 2030 from the base year 2021. We will achieve it without offsets or beyond value chain mitigation.
Science Based Long-term Climate and Net-zero Target	Elisa Corporation is committed to reducing absolute scope 1, 2 and 3 GHG emissions 90% by 2040 from the base year 2021. We will prioritise decarbonisation through direct emissions reductions, and all residual emissions will be neutralised in line with SBTi criteria before reaching net-zero emissions.

Elisa sources 100% of its electricity from renewable energy across all operations, certified through *Energy Attribute Certificates*. If feasible, Elisa uses also other renewable energy sources, for instance for district heating and cooling, to further reduce its carbon footprint.

Circular economy, including resource inflows, outflows and waste, is assessed to be material for Elisa, and we have as part of our climate transition set a *Zero Waste 2030* target, with sub-targets.

Zero Waste for us means conservation of resources in all operations, to avoid harmful discharges.

Circularity and waste related commitments and targets	
	Zero waste in capital goods deliveries (upstream)
Zero Waste 2030	Zero waste to landfills or non-energy incineration (direct)
	Zero waste up till customer handover (downstream)

Product life extension through reuse, repairs, and refurbishing, as well as product as a service type of business models are some of Elisa's key activities in a transition toward a more circular economy.

We develop further such opportunities, for example through eco-design, while minimising our waste.

3.2 Circularity principles

The Elisa Zero-waste target for 2030, is supported by the following circularity action plan principles:

Circularity actions upstream in Elisa's value chain, especially within supply chain:

- Support solutions designed for circularity
- Source circular alternative when feasible
- Safeguard health and safety of workforce

Circularity actions within Elisa's direct operations, supported by business decisions:

- Increase lifespans and materials recovery
- Develop circular businesses continuously
- Phase out landfills and non-energy waste incineration

Circularity actions downstream in Elisa's value chain, especially with customers:

- Engage civil society in circularity thinking
- Expand sustainable and circular offerings
- Ensure a just and fair circularity transition

3.3 Recurring environmental reviews

As part of Elisa's Climate Transition Plan, we safeguard a safe and just transition, and continuously follow developments also in other areas of sustainability, in addition to societal aspects, for example issues in biodiversity, pollution, and water, by for instance consulting relevant affected stakeholders.

We furthermore recognise that there may be important environmental topics with potential impacts, which we in our double materiality assessment currently have not identified to be material for Elisa.

We recurringly review environmental sustainability related topics in administrative, management and supervisory bodies for Elisa's Climate Transition Plan. Such reviews are based on a comprehensive, recurring procedure for identifying, assessing, and managing environmental dependencies, impacts, risks, and opportunities across Elisa's value chain and over a range of time horizons, with relevant interconnections to financial position and prospects. This also upkeeps board-level awareness of a range of important issues that are relevant when supervising the environmental sustainability of Elisa.

4 ENGAGEMENT AND TRAINING

This Policy is publicly available and communicated internally, so that all stakeholders can access it.

All Elisa employees are encouraged to familiarize themselves with this Policy and expected to complete related trainings that are assigned to them from time to time. Tailored or regular training is given to employees that are considered central in performing energy management related work tasks.

Through related training, facilitated dialogue, and communication, employees will on a sufficient level understand how they within their own responsibilities can contribute to environmental sustainability.

Through dialogue in the *Elisa Corporate Responsibility Management Board* (*CRMB*) and the *Environment and Energy Working Group* (*EEWG*), we identify training needs in energy management. Training needs are regularly assessed for all employees in learning discussions with their managers.

We broadly support environmental awareness, as part of Elisa's corporate responsibility activities, to improve for example circular economy know-how of Elisa employees in general. Through articles and bulletins in the Elisa intranet, we communicate with the organisation and highlight interesting themes.

Elisa publishes an annual Sustainability Report, which includes key figures around environmental sustainability. This report is prepared in accordance with accounting guidelines of the CSRD and *ESRS* requirements. Elisa reports *carbon dioxide equivalent* (*CO$_2$e*) emissions to CDP.

We develop our environmental sustainability communications into a quarterly interval, and over time aim for a real-time internal overview. We upkeep an annual clock for external channel communication.

We continuously improve our *Climate Transition Plan*, with its emission reduction targets. In addition, we measure our carbon handprint, i.e., how we can help our customers to reduce their own footprint.

This Policy commits to ensure internal availability of information and resources necessary to achieve our objectives and targets. Also, external transparency is important for being accountable for achieving our commitments. Therefore, we from 2022 onwards report our Scope1 and Scope 2 energy use and related emissions quarterly. The same applies to Scope 3 to the extent it is currently possible.

DEFINITIONS

Carbon emissions	Popular term for greenhouse gas emissions that cause warming of the atmosphere.
Carbon footprint	Amount of carbon emissions that an organisation is releasing into the atmosphere.
Carbon handprint	Solutions by a company that enable other parties to reduce their carbon footprint.
CDP	Key framework used by companies to voluntarily disclose environmental information.
Climate change	Referring to long-term rise in global temperatures, largely driven by human activity.
CO_2e	Meaning CO_2 equivalents, i.e., all greenhouse gases converted into carbon dioxide.
Code of conduct	Set of policies and principles that outlines the way of working for an organisation.
CSRD	*Corporate Sustainability Reporting Directive* requires assured sustainability reporting.
Eco design	Development that anticipates and minimises negative impacts on the environment.
Energy management	Combination of continuous efforts to improve energy performance for an organisation.
Energy performance	Comparison of energy-related performance-indicators against a specific baseline.
ESRS	*European Sustainability Reporting Standards* set the rules for sustainability reporting.
GHG emission	Referring to all greenhouse gases, e.g., carbon dioxide, methane, and nitrous oxide.
GRI	Standards by *Global Reporting Initiative* that define sustainability report practices.
Law	Rules by a society, that are enforced upon individual and organisational behaviour.
Management system	Management of interrelated activities to achieve the objectives of an organisation.
Net-zero	Referring to all carbon emissions of an organisation, also those in the supply chain.
Policy	Statement of intent, with guidelines for achieving desired results in a specific area.
Principle	Foundation that an organisation can base its behaviour or chain of reasoning upon.
SASB	Sustainability reporting framework by *Sustainability Accounting Standards Board*.
SBTi	*Science Based Targets initiative* verifies voluntary carbon reduction commitments.
Scope 1	Carbon emissions that are directly controlled by an organisation, usually from fuel.
Scope 2	Carbon emissions from energy use that is indirectly controlled by an organisation.
Scope 3	Carbon emissions that an organisation indirectly impacts through its value chain.
Sustainability	Meeting current needs without compromising the ability of meeting future needs.
UN Global Compact	Voluntary pact that encourages organisations to adopt ten sustainable principles.
Zero waste	Conservation of resources to avoid all harmful discharges to land, water, or air.

RELATED DOCUMENTS

The *Elisa Code of Conduct* sets the foundation for our own ethical business behaviour, while the *Elisa Code of Ethical Purchasing* describes the ethical and legal duties and responsibilities of our suppliers.

The *Elisa Energy Policy* describes the compliance with legislation and regulations in our operations and how we commit to sustainably improve energy performance in our business and other operations.

The *Elisa Environmental Management System* (*EMS*) describes our operational context, scope, objectives, and ways to manage resource efficiency and environmental sustainability. It mentions energy management on a general level but refers to related management system or policy for details.

The *Elisa Energy Management System* (*EnMS*) establishes systems and processes necessary to continuously improve our energy procurement, efficiency, use, consumption, and emission mitigation. It supports us in setting objectives, taking actions, and reaching targets, while continuously learning.