

Elisa Energy Policy

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1 PURPOSE AND SCOPE

The *Elisa Energy Policy* (“Policy”) supports Elisa’s mission of *A Sustainable Future Through Digitalisation*, which from an *energy performance* and management point of view means optimising *net energy balance* of all Elisa operations, requiring as high a degree of *energy efficiency* as possible.

1.1 Purpose of the policy

This Policy specifies further the principles constituted in the *Elisa Code of Conduct* and the *Elisa Environmental Policy*. It offers guidance on responsible conduct and sets out our commitments and approach for reaching our various energy-related targets within Elisa's global business environment. This Policy thus provides a solid and obligatory foundation for the *Elisa Energy Management System*.

1.2 Scope and applicability

Energy directly or indirectly impacts Elisa’s different units and functions, and this Policy is applicable in all Elisa Group companies. Elisa commits to comply with all applicable energy laws and regulations.

We also expect our suppliers, subcontractors, and external partners to comply with similar principles.

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.

1.4 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 Environmental Policy* describes the compliance with legislation and regulations in our operations and how we commit to reduce environmental impact 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.

The *Elisa Energy and GHG Emission Disclosure* is a supplement to our annual responsibility report.

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.

ICT solutions consume energy but simultaneously play a key role in lowering *carbon emissions* globally. Elisa is carbon neutral since 2020 and wants to be part of creating a *carbon neutral* society.

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.

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 energy 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 reports to Elisa's whistleblowing channel 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 energy reporting recommendations of the *GRI* and *SASB* frameworks.

Elisa adapts the *TCFD* framework to assess financial risks and opportunities, and we have used the *CDP* platform to disclose these since 2011. Energy related measurements are impactful for us in both.

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 largely responsible for coordinating, facilitating, and managing energy information disclosures, but depend on colleagues across the organisation for data.

3 GENERAL PRINCIPLES

By our energy efficient solutions, we can obtain significant reduction of both our own as well as our customers' carbon footprint. We continuously develop our operations, and we can provide sustainable digital services that also enable our customers to be more energy-efficient and thus climate-friendly.

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 its various stakeholders with non-financial information on our progress, both through recurring reports and specific requests. We have since 2009 continuously improved energy efficiency of our infrastructure and report such measures to the *Finnish Energy Efficiency Agreement*, which is guided by the *EU Energy Efficiency Directive*.

Commitment	Target
EU Energy Efficiency Directive	Energy audit every four years, with report of audit results.

Responsibility is one of Elisa's company values. In *environmental responsibility* we focus on *climate change* and *resource efficiency*. Elisa was one of the first Finnish companies to set a science-based target through *SBTi (Science Based Targets initiative)*. Elisa became *carbon neutral* in 2020 and has through *The Climate Pledge* initiative committed to a *Net Zero* goal for 2040, and in support of that committed to setting a *Net Zero* target also through SBTi. Elisa is actively involved in creating a carbon neutral society, where *information and communications technology (ICT)* solutions will play a key role.

Commitment	Target
Finnish Energy Efficiency Agreement	Energy efficiency improvements of 4% by 2020, and currently 7.5% by 2025, compared to 2016 reference level.
Science Based Near-term goal T1	Scope 1 and Scope 2 emissions reduction of 50% from our own operations by 2025, compared to 2016 reference level.
Science Based Near-term goal T2	Scope 3 emissions reduction of 12% (all our travels, waste, supply chain) by 2025, compared to 2016 reference level.
Science Based Net Zero Commitment	Commitment to set Science Based Net Zero target for 2040.

We use internal scorecards with energy savings and related 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 will from 2022 onwards report our Scope 1 and Scope 2 energy use and related emissions quarterly. The same applies to Scope 3 to the extent it is possible.

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 should contribute to Elisa's energy performance.

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 energy efficiency 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 a responsibility report, which also includes annual key figures around energy. This report is prepared in accordance with accounting guidelines of the *Global Reporting Initiative (GRI) Core* requirements. Elisa reports its *carbon dioxide equivalent (CO₂e)* emissions to CDP. We explain our calculation principles and factors in the Elisa Energy and GHG Emission Disclosure document.

We develop our external energy performance communications into a quarterly interval, and over time aim for a real-time internal overview. A communication plan will be established for external channels.

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.
Carbon neutral	Usually referring to the carbon emissions that an organisation directly can influence.
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 ₂ e	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.
Eco design	Development that anticipates and minimises negative impacts on the environment.
Energy efficiency	Using the minimum amount of energy required to maintain a certain level of activity.
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.
GHG emission	Referring to all greenhouse gases, e.g., carbon dioxide, methane, and nitrous oxide.
GRI	Standards by <i>Global Reporting Initiative</i> 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.
Net energy balance	In Elisa's context meaning total energy demand compared to its balancing elements.
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 <i>Sustainability Accounting Standards Board</i> .
SBTi	<i>Science Based Targets initiative</i> 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.
TCFD	Reporting model by Financial Task Force on Climate-Related Financial Disclosures.
UN Global Compact	Voluntary pact that encourages organisations to adopt ten sustainable principles.