SUSTAINABILITY FINANCE FRAMEWORK

January 2022

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BACKGROUND AND INTRODUCTION

About Elisa

Elisa is a pioneer in telecommunications and digital services, and technologies. We are the market leader in mobile and fixed network services in Finland, and number two in Estonia.

Throughout our nearly 140-year history, we have always been enthusiastic about utilising new technologies and innovating new ways of working. Our vision is to become a recognised international provider of digital services and a brand of excellence. We now serve over 2.8 million consumer, corporate and public organisation customers in our core markets in Finland and Estonia, as well as internationally. Cooperation with Vodafone and Tele2, among others, enables us to offer globally competitive services. We also offer digital services to the growing international markets. This portfolio includes e.g. visual communication services, entertainment services and cloud-based IT services.

Elisa's mission is a sustainable future through digitalisation. We use digitalisation to resolve issues that are important to people, society and sustainable development. These include safety, equality and determined action to help limit climate change. Important areas where we can develop sustainable operations are a secure and safe digital environment, promoting equality, ethical business code and taking action against climate change. In 2020, we became the first carbon-neutral telecom operator in the Nordics.

We are signatories to UN Global Compact and UN Women's Empowerment Principles. We respect human rights in all our operations and busines relationships, as well as international agreements related to working conditions, human rights, gender equality, the environment and the prevention of corruption, in all our countries of operation and in our network of partnerships.

We acknowledge the importance of the United Nations Sustainable Development Goals (SDGs) as part of a commonly agreed global ambition to promote sustainability and ensure prosperity for all. We have integrated the UN SDGs into our strategy and operations both to contribute (carbon handprint) and to reduce our negative impact (carbon footprint). We focus on the goals where our biggest sustainability impacts are:

Sustainable industry, infrastructure and innovation

Reducing inequalities

Climate action

Peace, justice and good governance

ENVIRONMENTAL SUSTAINABILITY:

We enable our customers to become more resource efficient

The ICT industry is a key player in transforming the way we live and work to become more environmentally friendly and mitigate climate change. For the ICT industry to be able to effectively help other industries reduce their emissions, it must take care of its own emissions.

Energy efficiency and cutting emissions have been part of our sustainability strategy since 2009. In 2018, we were one of the first Finnish companies to define our climate targets in compliance with the requirements of the Science Based Targets initiative and in line with the 1.5-degree target of the Paris Agreement. By 2025, we will have reduced emissions from our own operations (Scopes 1 and 2) by 50 per cent from the 2016 level, as well as cutting our emissions linked to travel and waste as well as from our supply chain (Scope 3) by 12 per cent.

Elisa's science-based targets

1. By 2025, we will reduce our emissions (Scopes 1 and 2) by 50% compared to 2016.

2. By 2025, we will reduce emissions related to travel and waste, as well as emissions from the supply chain (Scope 3) by 12% compared to 2016.

Focusing on climate and energy

Elisa's environmental policy and management system guide our work of decreasing our key environmental impacts. We are committed to improving the environmental impacts of our business and promoting environmentally sustainable operations.

The energy efficiency working group meets four times a year to monitor how well we are achieving our energy efficiency and carbon footprint targets. Material climate risks are reviewed in the energy efficiency group once a year. The EU Energy Efficiency Directive requires Elisa to perform energy audits at company and target level every four years.

We report our carbon footprint annually in the international CDP survey, and Elisa achieved a rating of A- in the Climate Change 2020 assessment. Thousands of companies from around the world participate in CDP's annual climate reporting every year.

In 2020, we became the first carbon neutral teleoperator in Nordics. In order to progress our ambition further, in 2021, we signed up to the Global Climate Pledge to become carbon net zero by 2040.

The measures we are taking to limit carbon emissions include using renewable electricity, network optimisation and utilisation of new, more energy-efficient technologies as well as waste heat recovery and reuse.

Our services help our customers to reduce their carbon footprint

Elisa's mission is a sustainable future through digitalisation. In addition to our persistent work to limit our own emissions, we provide sustainable digital services to our customers. It is estimated that the contribution of mobile technologies to reducing emissions is as much as ten times bigger than the industry's own climate impact (GSMA: The Enablement Effect report).

Elisa's digital services, such as mobile network efficiency and virtual meeting services, are helping reduce the climate burden of our customers' operations. We also provide our customers with efficient recycling, reuse and refurbishment services for handsets, as well as the option to procure environmentally friendly new or used devices.

Business case examples of our services and operations

- Elisa IndustrIQ offers improved energy and material efficiency
- Elisa Videra's virtual interactive services reduce travel
- Elisa Automate helps operators optimise the network and reduce electricity consumption
- We utilise waste heat from data centres
- We recycle used devices and offer a repair service (Fonum)
- We were the first company in Finland to offer Fairphone devices

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SOCIAL SUSTAINABILITY:

We advance a fair and digitally inclusive society

We work every day to build a secure digital environment where everyone's equal rights are realised. Respecting human rights and our principles of doing right in our own operations and within our supply chain, we can work together for our employees and with our partners to create a sustainable future. Non-discrimination, equality, good leadership and occupational wellbeing and safety are important topics in our operations.

Responsible employer

Elisa employs thousands of professionals in Finland and around the world. As we internationalise, promoting inclusivity and non-discrimination is increasingly important: today already 23 per cent of Elisians work in over 16 countries outside Finland. This development will continue, as we want to employ diverse teams of people that are reflective of the societies and customer bases where we are and where we operate.

We promote location-independent work, and we have been developing our working culture, facilities and working tools for several years already to best support safe and equal well-being at work, whether people are working in the office or remotely. Our working culture is founded by Elisa's management principles. Shared values, coaching leadership, regular learning discussions and jointly agreed goals enable Elisa employees to freely choose the manner and place that best suits their working.

We have zero tolerance for any form of discrimination or harassment in our workplaces or business relationships. Elisa employees and our partners have a duty to report any breaches of this principle.

Promoting diversity and inclusion

The most diverse companies are more likely than ever to outperform their less diverse peers in terms of profitability. As we expand internationally, diversity and inclusion are becoming ever-more important for us. We are promoting our journey towards an inclusive Elisa culture among our employees and in terms of customer interaction. Our work on diversity and equality is coordinated by the Equality Committee, which coordinates its development and conducts regular reporting and follow-ups about diversity action and performance according to the annual equality plan.

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DIGITAL SUSTAINABILITY:

We secure people's privacy in a safe and reliable digital environment

The foundation of our business is the trust of our customers. We win and retain this trust by providing well-functioning and accessible services, a high level of data security in our operations, as well as fair and sustainable data management.
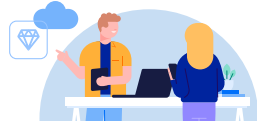
Transparency and communication
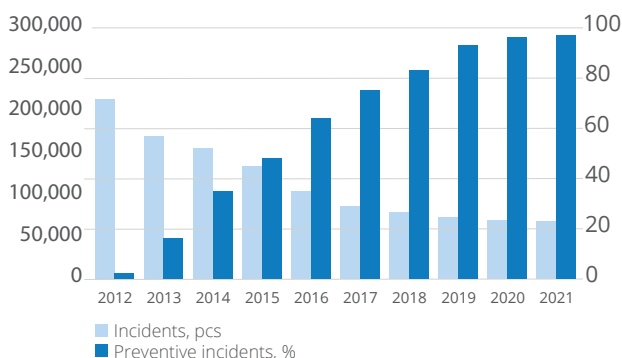
Co-operation & Trust

Resilience

Continuous Improvement

Well-functioning society and safe services

We play a key role in ensuring the operational reliability of society in Finland and Estonia. Most of our investments are aimed at the functionality of our network, new technologies, energy efficiency and improved availability.

We ensure that all our connections and services keep operating by means of active 24/7 monitoring, predicting and eliminating faults, and network modifications. Thanks to automation, there are significantly fewer disturbances in the Elisa network than there used to be, despite the fact that the traffic volumes have increased many times over.

Cybersecurity and privacy

Cybersecurity is a key part of our operations and the quality of our services. We conduct regular audits in our own and our suppliers' environments, either ourselves or through third parties. Our data centres are ISO 27001-certified in Finland and Estonia. Our key principles in securing customer trust are developing a cybersecurity culture, transparency, clear communication, strong stakeholder cooperation, a layered approach to cybersecurity, and the continuous development of our operations.

Accessibility and digital inclusion

Ensuring that everyone in society has access to and can make use of information and communication technologies and benefit from digitalisation is vitally important to us. Therefore the safety, accessibility and ease of use of our services are the most important issues when developing the customer experience. The key goals of our service design are ease of use, accessibility, security, productivity and excellent user experience.

Artificial intelligence opportunities

In addition to the efficiency and accuracy gains from automation, machine learning and artificial intelligence offer huge opportunities in developing operating models, use of data, services and the service experience. They enable companies to reduce their environmental and social impact by improving their efficiency and quality, and by developing new, more sustainable business models, as well as products and services across businesses.

Elisa network incident management development

Incidents, pcs
Preventive incidents, %

ECONOMIC SUSTAINABILITY:

We intensify innovation and drive sustainable value creation

By operating in a responsible and profitable manner, we provide value for Finnish and Estonian society in many ways. Investments, employment, the taxes we pay to society and the dividends we pay to our owners, as well as payments to our partners, increase financial wellbeing. Our long-term and consistent strategy aims at enabling sustainable business for our stakeholders in the future, as well.

As a responsible company, ensuring that we operate profitably and competitively is important to us, as it is the only way to guarantee continuous development of our services and network, as well as to employ thousands of skilled employees, together with our network of partners. Our collaboration with over 5,000 suppliers and subcontractors is a vital part of the responsible development of our business, ensuring that we achieve our quality and responsibility goals in the different parts of the supply chain.

Continuous innovation to drive sustainability is a must, and we participate in the continuous development of society through our active research and startup cooperation. Elisa has extensive experience in creating successful and sustainable services and digital society in collaboration with start-ups and academia.

Stakeholder dialogue and materiality

By promoting continuous and close dialogue with our stakeholders, we are able to better understand what expectations our stakeholders have for us and recognise our impacts on society, as well as other significant trends affecting our industry now and in future. The most important sustainability themes from the 2020 materiality analysis are shown in this image:
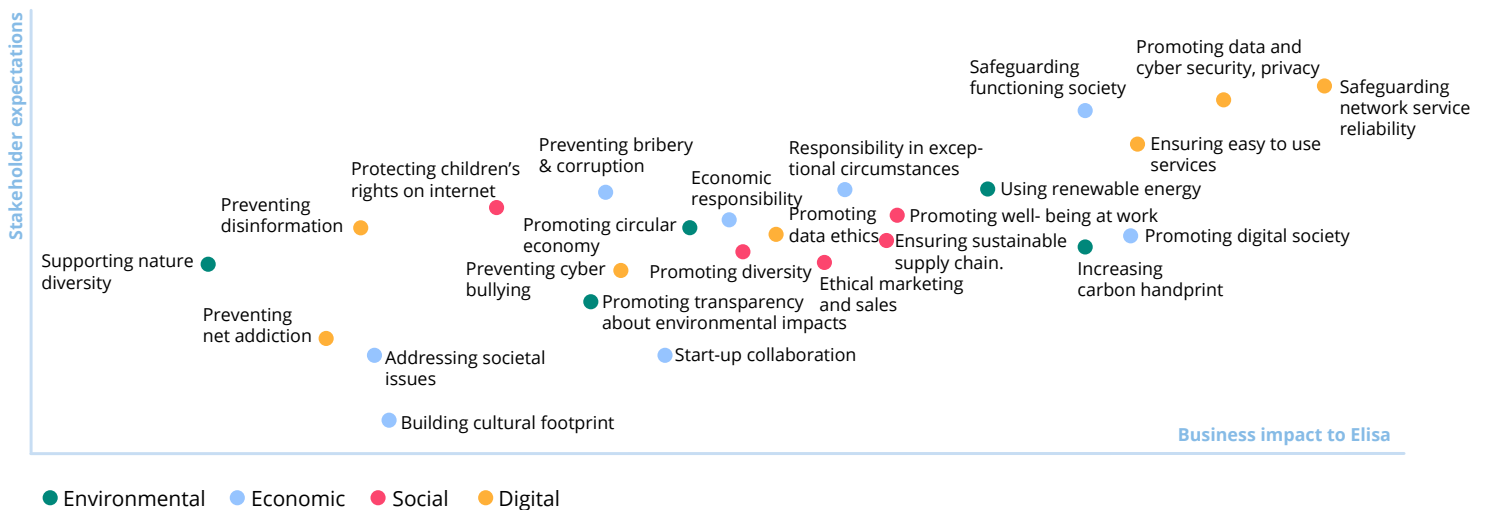
Sustainability targets and performance governance

Sustainability topics are regularly discussed and approved by Elisa's Corporate Responsibility Management Board, the Corporate Executive Board and the Audit Committee of the Board of Directors. Elisa's Board of Directors confirms and signs off on the annual responsibility report, including non-financial information. The Chief Financial Officer and the Executive Vice Presidents for Human Resources and Administration are responsible for economic, social and environmental topics in the Elisa Corporate Executive Board.

Responsibility is one of Elisa's strategic goals and one of our strategy scorecard indicators. We have also determined corporate goals and indicators for the different responsibility sectors, which we report annually in our responsibility report.

Sustainable Financing

Elisa is committed to conducting responsible and sustainable business at all levels. This commitment includes our financing operations. As part of this commitment, in September 2021, we signed our first sustainability-linked revolving credit facility, and we are establishing the Sustainability Finance Framework to enable us to issue Sustainable Finance instruments based on Use of Proceeds, as well as to continue to explore opportunities to further expand the amount of sustainable financing we use.

We will continue to monitor the development of the green, social and sustainability bond and loan market and strive to continually advance the framework and its sustainability

terms. As such, the Sustainability Finance Framework may be updated from time to time to reflect market practices and regulatory developments related to sustainability that may impact its content. In establishing the terms in the framework, we have aimed to comply with existing market practices, such as the Green Bond Principles (2021), Social Bond Principles (2021) and Sustainability Bond Guideline (2021), as well as the Green Loan Principles (2021) and Social Loan Principles (2021). We are following the development of the EU Taxonomy and the European Green Bond Standard, but we have currently not included strict references for either given their status when the framework was published.

Elisa has worked together with Handelsbanken to develop this Sustainability Finance Framework. Sustainalytics has provided a second party opinion on the framework, which is available with the framework on our website.

Helsinki, January 2022

Veli-Matti Mattila

CEO

Jari Kinnunen

CFO

METHODOLOGY

Environmental Objectives

The Green Bond Principles together with the EU taxonomy for sustainable activities (the "EU Taxonomy") are a set of high-level environmental objectives that outline the main environmental benefits of the anticipated use of proceeds by Elisa from any potential environmentally focused Sustainability Financing. Of the high-level objectives, two key environmental objectives for Elisa are outlined below, of which climate change mitigation will be the primary target within environmentally focused Sustainability Financing by Elisa.

1. Climate change mitigation
   Activities that contribute to the stabilisation of green-house gas concentrations in the atmosphere at a level that prevents dangerous anthropogenic interference with the climate system by avoiding or reducing green-house gas emissions or by removing greenhouse gases from the atmosphere.

2. Climate change adaptation
   Activities that contribute to reducing or preventing the negative effects of the current and expected future climate on location- and context-specific economic activities or natural and built environments.

Social Objectives and Alignment with the UN SDGs

Agenda 2030 and the Sustainable Development Goals (SDGs) were adopted by the United Nations General Assembly on 25 September 2015. The 17 global goals, with 169 defined underlying targets, aim to achieve long-term development of economic, social and environmental sustainability in order to eradicate extreme poverty, reduce inequality and injustice around the world, and fight climate change.

Elisa carried out an update on its materiality assessment of the sustainable development goals in 2020. The work was used to evaluate Elisa's operations in terms of positive (carbon handprint) and negative (carbon footprint) effects using the sustainable development sub-goals, and through their associated opportunities for influence. The goals were revised in 2021 as part of Elisa's strategy process. Promoting these goals is an important part of Elisa's responsibility and sustainable development work.

Elisa focuses on the following sustainability goals:

	Objective	UN SDGs
Digital Sustainability	We secure people's privacy in a safe and reliable digital environment	16 PEACE, JUSTICE AND STRONG INSTITUTIONS
Social Sustainability	We advance a fair and digitally inclusive society	10 REDUCED INEQUALITIES
Economic Sustainability	We intensify innovation and drive sustainable value creation	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
Environmental Sustainability	We enable our customers to become more resource effient	13 CLIMATE ACTION

Sustainability objectives and relevant UN sustainability goals form the base for our internal actions. The UN SDGs are closely inter-linked with our key contributions and relevant sustainability indicators.

	UN SDGs	Key contribution(s)	UN SDG interlinks
Digital Sustainability	**16** PEACE, JUSTICE AND STRONG INSTITUTIONS	**We secure people's privacy in a safe and reliable digital environment** 16.3 Build digital trust, safeguarding the security of our customers' data and their privacy 16.10 Ensure public access to information and safeguard fundamental freedoms	10 REDUCED INEQUALITIES 9 INDUSTRY INNOVATION AND INFRASTRUCTURE 8 DECENT WORK AND ECONOMIC GROWTH
Social Sustainability	**10** REDUCED INEQUALITIES	**We advance a fair and digitally inclusive society** 10.2 Empower and promote the social, economic and political inclusion of all 10.3 Ensuring non-discrimination and equality across business operations	4 QUALITY EDUCATION 5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH
Economic Sustainability	**9** INDUSTRY, INNOVATION AND INFRASTRUCTURE	**We intensify innovation and drive sustainable value creation** 9.1 Develop quality, reliable, sustainable and resilient infrastructure 9.4 Upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and adoption of clean and environmentally sound technologies and industrial processes 9.5 Enchance scientific research by promoting innovation	16 PEACE, JUSTICE AND STRONG INSTITUTIONS 8 DECENT WORK AND ECONOMIC GROWTH 12 RESPONSIBLE CONSUMPTION AND PRODUCTION
Environmental Sustainability	**13** CLIMATE ACTION	**We enable our customers to become more resource effient** 13.2 Integrate climate change measures into policies, strategies and planning 13.3 Promote consumer awareness on sustainable and responsible consuption	12 RESPONSIBLE CONSUMPTION AND PRODUCTION 7 AFFORDABLE AND CLEAN ENERGY 9 INDUSTRY INNOVATION AND INFRASTRUCTURE

Allocation of Net Proceeds

An amount equal to the net proceeds of any Green, Social or Sustainability Bonds will be used to (re-)finance Green or Social Assets and Projects in accordance with this Sustainability Finance Framework. The majority of the net proceeds are expected to be allocated to existing projects and assets (defined as projects and assets older than 12 months). The proportion of the amount equal to the net proceeds allocated to new projects and assets will be disclosed in the annual reporting.

Exclusions

The net proceeds will not be allocated or linked to fossil-based energy generation, nuclear energy generation, research and/or development into weapons and defence, gambling, adult entertainment or tobacco.

SUSTAINABILITY TERMS

Sustainability Finance Framework

This Sustainability Finance Framework is based on the 2021 versions of the Green Bond Principles, Social Bond Principles and Sustainability Bond Guidelines, all as issued by the International Capital Market Association (ICMA), as well as on the 2021 version of the Green Loan Principles and the Social Loan Principles, each as published by the Loan Market Association.

This Framework provides the background for positioning the rationale for Green, Social or Sustainability instruments within Elisa's overarching sustainability strategy.

The following five components form the basis of Elisa's Sustainability Finance Framework and are based on the key components of Green Bond Principles, Social Bond Principles and Sustainability Bond Guidelines:

1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting
5. Verification

Use of Proceeds

An amount corresponding to the net proceeds of any Sustainable Finance instruments issued by Elisa will be used exclusively to finance or re-finance assets and projects that are eligible pursuant to the criteria contained in the Sustainability Terms, including Allocation of Net Proceeds and Exclusions, and which have been evaluated and selected by Elisa in accordance with this Sustainability Finance Framework.

Both financing and refinancing of tangible assets (without age restriction) and operational expenditure (with a lookback period of up to three years before the issuance of any Sustainable Finance instrument), such as maintenance costs related to green assets that either increase expected lifetime or energy efficiency can qualify. The combined amount allocated to a specific Asset or Project, by one or several sources of financing with specified use of proceeds may not exceed the value of the asset or project.

The table below outlines the Sustainable Finance Use of Proceeds categories for Green, Social and Sustainability instruments.

Green Assets and Projects

Energy Efficiency

Primary Objective:

Climate Change Mitigation

Improvements in energy efficiency on network infrastructure and data centres

- Energy efficiency projects relate to modernisation of networks and supporting infrastructure. These projects can include, but are not limited to: replacement of 3G or 4G with 5G, transforming fixed legacy networks with the latest technology fibre networks

- Deployment, extending and optimisation of high-speed networks as well as improving coverage of connectivity services or energy efficiency measures in supporting infrastructure including, but not limited to, improvements in cooling, modernisation of waste heat management, development of smart and optimised power management systems/processes, and storage, cloudification, automation of maintenance

R&D and Innovation

Innovation projects can include, but are not limited to:

- IoT services and solutions related to energy efficiency, resource efficiency and/or other material efficiencies

- Machine learning and AI solutions that increase energy efficiency, resource efficiency and/or other material efficiencies

- Smart solutions that enable improved efficiency through smart metering, data analytics and optimisation

Data-driven solutions for GHG emission reductions

These solutions can include, but are not limited to:

- Elisa IndustrIQ solutions and projects, which can include, but are not limited to, optimisation and analytics for industrial manufacturing processes as well as real-time monitoring

- Development of smart, optimised power management systems/processes and storage

Renewable Energy

Primary Objective:

Climate Change Mitigation

Development, construction, operation or maintenance of onsite or offsite renewable energy and the related transmission capacity and infrastructure, including long-term (defined as over five years) physical Power Purchase Agreements when they relate directly to providing renewable energy to another eligible Green Asset or Project

Green Buildings and Data Centres

Primary Objective:

Climate Change Mitigation

Development, acquisition, refinancing or operation of new (defined as properties taken into use from 1 January 2021 onwards) or existing properties (defined as properties taken into use before 1 January 2021) that have, or will receive, BREEAM certification (at least "Very Good"), LEED certification (at least "Gold") or the Nordic Swan Ecolabel, as well as at least 10 per cent lower energy use per square metre than required by the applicable national building code

For Data Centres, power usage effectiveness (PUE) must be 1.5 or below, and the data centre must only utilise renewable energy.

Major renovations require an overall reduction in energy use of at least 30 per cent or must result in the property or data centre meeting the above-mentioned criteria to be considered an eligible Green Asset or Project.

For data centres, eligible Assets and Projects can also include energy efficiency investments as outlined in the category above.

Social Assets and Projects

Digital Inclusion

Deployment of networks to enable equal and secure access to network and equal connectivity

Elisa's objective is to advance a fair and digitally inclusive society through our services. Projects that enable people to have equal and secure access to networks as well as equal opportunities for connectivity can include, but are not limited to:

- Expansion and upgrade of 4G and 5G networks
- Rollout and upgrade of high-speed fixed network connections

Social Objective:

We advance a fair and digitally inclusive society

Ensuring equal access to the internet and enabling adoption of internet-based services and applications. Enabling the use of online services to improve social mobility.

Target Population: Especially, but not exclusively, unconnected populations, underserved populations, aging populations, young people and those in the most vulnerable positions regarding connectivity.

Social Inclusion

Social inclusion projects aim to advance equal access to services, a digitally inclusive society and a safe digital environment, as well as development of new skills and economic growth.

Supporting social inclusion, healthcare, entrepreneurship and new skills for economic growth

Eligible projects can include, but are not limited to:

- Enhancement and establishment of start-up ecosystems focused on social impact through funding and support programmes as well as through direct or indirect investments
- Connectivity and private network solutions for hospitals to ensure fast, secure connections and devices for safe healthcare, enabling creation of new solutions
- Development of solutions for healthcare and remote condition monitoring, especially, but not exclusively, during health crises

Social Objective:

We advance a fair and digitally inclusive society

Ensuring equal access to the internet and enabling development of further internet-based services and applications. Enabling the development of online services to improve social mobility.

Target Population: Especially, but not exclusively, unconnected and underserved populations, aging populations, people in hospital and their families, unemployed people, start-up entrepreneurs, and those in the most vulnerable positions regarding connectivity during health crises.
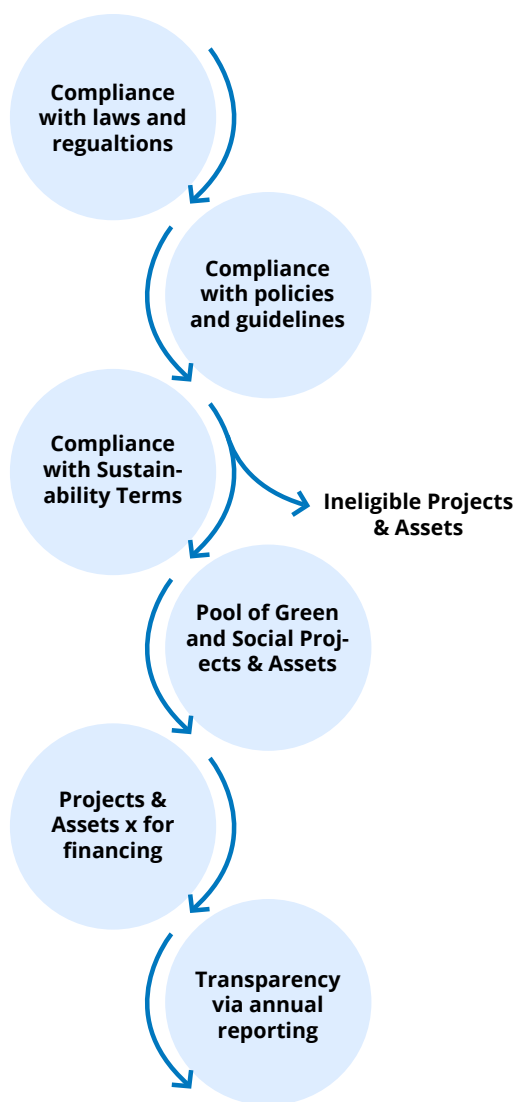
Process of Evaluating and Selecting Projects

Projects and assets eligible for Sustainable Finance will be identified as part of the ongoing operations and through Elisa's standard investment decision process. Projects and assets identified will be evaluated by the Investment Board (IB). The IB has the following members:

- Chief Financial Officer
- Executive Vice President, Corporate Customers
- Executive Vice President, Consumer Customers
- Executive Vice President, Production

When evaluating and deciding Sustainable Finance projects VP for Corporate Responsibility and Group Treasurer will attend the meeting.

The board will evaluate the projects and assets nominated to ensure compliance with the Sustainability Terms. It will review information about the Green and Social Projects and Assets, and will evaluate their overall environmental and social impacts, which can include life cycle considerations, potential rebound effects, suitability for social objectives and target population. Green and Social Projects and Assets must also be compliant with applicable national laws and regulations, as well as policies and guidelines at Elisa. A decision to allocate net proceeds will require a consensus decision by the IB. Decisions made by the board will be documented. To ensure legitimacy in the process, an updated list of all Projects and Assets that meet the Sustainability Terms will be kept by Elisa's finance department. If a Project or an Asset ceases to meet the Sustainability Terms, it will be removed from the list. The list will form the basis for annual impact and allocation reporting for any outstanding Sustainable Finance instrument.

The flow diagram contains the following steps:

- Compliance with laws and regualtions
- Compliance with policies and guidelines
- Compliance with Sustainability Terms
- Ineligible Projects & Assets
- Pool of Green and Social Projects & Assets
- Projects & Assets x for financing
- Transparency via annual reporting

Management of Proceeds

An amount equal to the net proceeds of any issuance under this Sustainability Finance Framework will be tracked and monitored by Elisa on a portfolio basis (the "Sustainability Portfolio"). Elisa will include information about each Sustainability Financing instrument in the Sustainability Portfolio.

If an eligible Green or Social Project or Asset no longer qualifies according to the Sustainability Terms or if the underlying eligible Green or Social Project or Asset is divested, it will be removed from the Sustainability Portfolio. Funds may be reallocated to other eligible Green or Social Projects and Assets at any time during the term of any Sustainability Financing instrument, unless otherwise agreed in legal documentation.

The finance department will keep a record of any change in the Sustainability Portfolio. Pending allocation of the net proceeds, including the unlikely event of there being no eligible Green or Social Projects and/or Assets, the proceeds may be temporarily invested or utilised by the finance department in accordance with Elisa's financial policy. However, in such a case, the exclusions will apply, meaning that unallocated proceeds may not be invested or utilised for purposes outlined in the Exclusions section of this Framework.

REPORTING AND TRANSPARENCY

Elisa will publish an annual report on its website that will detail how the proceeds of Sustainability Financing are allocated and how they adhere to the Sustainability Terms (the "Reporting"). The first such Reporting is expected to take place one year after the signing date of the inaugural Sustainability Financing. Thereafter, the timing of the Reporting may be aligned with Elisa's annual reporting cycle. The Reporting will be published annually until no Sustainable Financing is outstanding.

The Reporting will contain information on the Green and Social Assets and Projects that have been financed with Sustainability Financing, a summary of Elisa's activities in the past year as they pertain to Sustainability Financing as well as information, including examples, of how the Green and Social Assets and Projects being financed adhere to the relevant criteria. Where relevant, Elisa will seek to align the reporting with the latest standards and practices, as identified by ICMA, and the guidelines in the Nordic Public Sector Issuer's Position Paper on Green Bond Impact Reporting. Similarly, Elisa aims to follow reporting guidelines published in connection with the EU Taxonomy and will seek to align these reporting requirements to the extent practical and feasible.

Allocation reporting

Elisa will provide allocation reporting for each of the categories for Use of Proceeds in the Framework. The emphasis will be on providing examples and allocation reporting in connection with individual projects, based on size. The allocation reporting will include:

- The sum of outstanding Sustainable Finance instruments and the balance of the Sustainability Portfolio, including any short-term investments or funds managed within Elisa's liquidity portfolio.

- The proportion of net proceeds allocated to new investments, i.e. projects and assets financed within 12 months from completion.

All data will be from the end of the previous financial year, except in the inaugural Reporting, which may relate to time periods other than the financial year.

Performance reporting

The Reporting will also contain a set of asset- and project-level performance indicators. Elisa will disclose the impact based on the proportion of the total investment that comes from Sustainability Financing. For projects and assets that are not yet operational, Elisa will provide estimates of future performance levels. Given the number of project types in the use of proceeds categories, the reported KPIs for green and

social assets and projects could differ from the indicators listed below. Elisa will emphasise the number of people being served through social projects as well as energy savings and greenhouse gas avoidance as the most relevant performance metrics for most asset and project types. Elisa will also outline calculation methodologies in the Reporting, especially for carbon footprint calculations.

Indicative key performance indicators

Green use of proceeds

- Annual energy savings

- Energy efficiency of transferred data (kWh / GB)

- CO_2 emissions avoided through energy savings or other measures

- Carbon footprint (Scope 1 and Scope 2)

- Emission intensity (kg CO_2 / EUR)

- Summary of possible energy efficiency measures taken

Social use of proceeds

- Number of social projects during the reporting period

- Number of people or families impacted through social projects and services

- Coverage of services for target population

- Number of innovations

- Number of major security incidents

- Cybersecurity index

External evaluation & verification

Elisa has engaged Sustainalytics to issue an independent opinion on the Sustainability Finance Framework, which is available on our website together with additional information about our work towards sustainability.

An external auditor of Elisa, or a similar party appointed by Elisa with the relevant expertise and experience, will examine and report whether an amount equal to the net proceeds from any Green, Social or Sustainability Bonds have been allocated to the Eligible Projects and Assets that Elisa has communicated in the Reporting. The conclusions will be provided in a signed statement, which will be published on Elisa's website.