



# General Disclosures

## General Disclosures (ESRS 2)

### General basis for preparation of sustainability statements (BP-1)

This ESRS sustainability statement has been prepared at the Group level as at January 1, 2025, and the scope of consolidation is the same as in the financial statements, except for IAR Systems Group ("IAR") acquired on October 17, 2025, which has only been included to a limited extent. IAR has been included as part of Qt Group's sustainability reporting for 2025 with regard to the own workforce-related metrics (i.e. S1-6, S1-9, S1-14, and S1-17). The sustainability statement examines the company's entire value chain from upstream to downstream. (see SBM-1 – Strategy, business model and value chain).

### Disclosures in relation to specific circumstances (BP-2)

This report presents the estimated impacts of financial risks and opportunities on future cash flow, and these impacts involve significant uncertainties. The amounts are the CFO's estimates and they have not been measured precisely.

In the 2024 report, the materiality scores and threshold values presented for the material topics were incorrect, and all figures have been corrected. The correction had no impact on the outcome of the materiality assessment.

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

Qt Group Plc's Board of Directors is responsible for preparing the company's short-term and long-term strategies, taking into account the expectations of various stakeholders. The operational management, i.e. the CEO and the other members of the Management Team, is responsible for the company's business operations and governance in accordance with the instructions issued by the Board of Directors and the provisions of the Finnish Limited Liability Companies Act.

The members of Qt's Board of Directors and Management Team have extensive international experience in various management and business-related roles. Qt has not separately defined the special competence or expertise of the administrative, management, and supervisory bodies regarding the supervision of different sustainability matters. Qt has used external ESG experts in its double materiality analysis, climate scenario analysis, and sustainability reporting process. More information on the background and expertise of the members of the Management Team and the Board of Directors is provided in Qt's Corporate Governance Statement.

There is no representation of employees in the administrative and supervisory bodies, but all members of the Management Team are employed by the company. All (100%) of the members of the Board of Directors are independent of Qt. The Chair

of the Board Robert Ingman is independent of Qt Group, but not independent of its major shareholders.

The Board of Directors had two (2) committees in the financial year 2025: the Compensation and Nomination Committee and the Audit Committee. The Audit Committee of the Board of Directors is responsible for the oversight of tasks related to Qt's sustainability reporting, which means that the Audit Committee also supervises sustainability impacts, risks and opportunities. Responsibilities or processes related to the monitoring and oversight of the progress of impacts, risks and opportunities have not otherwise been separately specified in the company's terms of reference or Board mandates.

Qt Group integrated sustainability risks into its risk management during 2025. In connection with the integration process, Qt identified certain challenges in the systematic monitoring of sustainability impacts and opportunities as part of risk management, and the company is therefore considering preparing a separate sustainability program in 2026.

The management of impacts, risks and opportunities is reported as part of this sustainability statement approved by the Audit Committee and the Board of Directors. The Management Team has operational responsibility for the development of HR, data protection, and corporate culture, but no regular monitoring has been specified for their progress thus far.

GENDER DISTRIBUTION AT TOP MANAGEMENT LEVEL

Board of Directors*	2024, n	2024, %*	2025, n	2025, %*
Female	2	33%	2	40%
Male	4	67%	3	60%
Other	0	0	0	0
Not reported	0	0	0	0
<b>Total</b>	<b>6</b>	<b>100%</b>	<b>5</b>	<b>100%</b>
Gender distribution**	0.5	-	0.67	-

  

Management Team***	2024, n	2024, %*	2025, n	2025, %*
Female	3 (2)	30%	2	25%
Male	7 (7)	70%	6	75%
Other	0	0	0	0
Not reported	0	0	0	0
<b>Total</b>	<b>10 (9)</b>	<b>100%</b>	<b>8</b>	<b>100%</b>

\* Situation at the end of the year.

\*\* Number of women in relation to the number of men.

\*\*\* Changes in the Management Team in 2025: Steffan Schumacher until March 31, 2025, Petteri Holländer until July 24, 2025, Aleksina Shemeikka until October 21, 2025, Erik Rehn from November 3, 2025. Reported figures as of December 31.

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

Qt will review the development of targets, metrics, and measures related to impacts, risks and opportunities as well as the sustainability management model during 2026. This work is still in progress, and the monitoring processes have therefore not yet been defined or their systematic monitoring not yet put on the agenda of the Management Team or the Board of Directors. Identified sustainability risks, i.e. data protection risks, have been integrated into Qt's risk management. The administrative, management, and supervisory bodies have not separately considered identified sustainability matters as part of strategic decisions.

The Audit Committee of the Board of Directors discussed matters related to sustainability reporting twice during 2025. The Audit Committee has also discussed matters related to the company's own workforce (S1), business conduct (G1), and data protection on its agenda.

Qt has not yet systematically built a due diligence process, and its implementation has not been included in the agenda of the administrative, management, and supervisory bodies. However, Qt is developing systematic risk-based supply chain management for technical consultants during 2026.

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

Qt does not have incentive or remuneration schemes related to sustainability matters.

### **Statement on due diligence (GOV-4)**

Qt has not yet systematically created or implemented a due diligence process and has not included a due diligence process in its governance model.

However, the due diligence process is applied partially, and its phases are described in the following sections of this Sustainability Report:

- Engaging with affected stakeholders: ESRS 2 GOV-2, SBM-2, IRO-1, S1-2 & S2-2.
- Identifying and assessing negative impacts on people and the environment: ESRS 2 IRO-1, SBM-3.
- Taking action to address negative impacts on people and the environment: ESRS 2 MDR-A, S1-4, S2-3 & G1-3.
- Tracking the effectiveness of these efforts: ESRS 2 MDR-M, MDR-T, S1-5, S2-5 and S1 & S2 & G1 topic-specific metrics.

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

The development of Qt's sustainability reporting process, which began in 2024, continued in 2025. Qt Group takes into account any risks to the completeness and integrity of data that may arise in the collection of sustainability data, for example, by involving employees from the company's various functions, clearly documenting the source of data and date of collection, and validating the data collected internally before external verification.

So far, the company has considered the risk management and internal control of sustainability reporting to be at a sufficiently good level, but the company will assess the need to implement sustainability reporting as part of the internal control system in 2026. The Audit Committee discusses the risk management and oversight of sustainability reporting together with the content of the report annually.

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

Qt Group is a global software company whose main products and tools are the Qt development environment and quality assurance and testing solutions. The company's products support the customers' entire product development process. The products can be used either as a seamless set of solutions or as separate tools and development environments, depending on the customer's needs. Qt's customers operate in more than 70 industries. They produce devices and applications in the automotive, medical devices, industrial automation, and consumer electronics industries, for example.

Qt Group's primary business operations consist of five parts:

- Research and development related to products and services
- Product management
- Sales and marketing
- Delivery (management & automation)
- After-sales services (customer support, consulting and training)

The core business is supported by the People and Culture function, the corporate infrastructure (legal services, accounting and finance), technological infrastructure (external servers, databases, and data), and procurement (professional services and IT services).

For the production of its products and services (upstream value chain), Qt requires, for example, IT, product development, sales and marketing tools, and tools used by employees (computers, phones, etc.). Products and services are delivered as software, tools, and services that are tailored to the various needs of customers (downstream value chain).

The EU and the United States both have restrictions on software exports. The export permit depends on the nature of the software and the country to which it is intended to be exported, and an export may not necessarily be permitted. Qt Group's mass-market products do not contain any functionality that would make them subject to strict export control regulations. Any restrictions primarily relate to applicable sanctions regimes, and for products other than mass-market products, export licences are applied for on a product-by-product basis. Qt's policy is that their products or related technical information may not be exported, re-exported, or transferred directly or indirectly to countries or entities that are subject to sanctions.

Acquired by Qt Group in October 2025, IAR provides software and services for the development of embedded software that companies worldwide use to manufacture safety critical products. IAR is headquartered in Uppsala, Sweden, and has strategically located sales and support offices around the world. IAR solutions support the development of embedded appli-

cations across a wide range of industries including automotive, industrial automation, IoT, medical devices, defense, and public safety. IAR's and Qt's businesses are very similar in nature, and the companies' net sales are mainly generated in the same customer industries and geographical areas.

## Interests and views of stakeholders (SBM-2)

	Stakeholder engagement methods	Purpose of engagement	Impacts on strategy and stakeholder relations	Planned measures	Informing the administrative, management and supervisory bodies
<b>Customers</b>	Sales, Customer Success, customer support, product managers' contact with key customers, customer surveys about products and customer relationships.	Creating value for customers through our products and services, ensuring customer satisfaction and collecting feedback to support continuous development.	Incorporating feedback into product development, steering of strategic and operational decisions.	Continuous development	Yes
<b>Employees</b>	Personnel survey, orientation training, leadership training, individual development discussions, team meetings and team activities, regular business reviews, communication tools, culture-related efforts and remuneration.	Employee well-being, strategy execution, dialogue between teams and management.	Updated processes and policies, reviews of benefits, clearer communication and clear action plans.	Continuous development	Yes
<b>Board of Directors</b>	Board meetings, committee meetings and Annual General Meeting.	The Board of Directors sees to the administration of the company and the appropriate organization of its operations.	The Board of Directors draws up the agenda for its work and sees to its implementation. The Board also approves the company's strategy and operating model based on the proposal of the Management Team.	Annual strategy work	Yes
<b>Analysts</b>	Discussions in connection with the publication of interim reports and at investor meetings, and other communication during the year.	Analysts follow listed companies and write analyses, share information and feedback from the capital markets with the company's management.	Assessment of the capital market in the company's strategy, operations, and communications.	Continuous development	No
<b>Business and technology partners</b>	Recurring and occasional meetings online, at events and face-to-face, as well as management-level policy setting meetings on a case-by-case basis.	Harmonization of product interoperability, establishment of marketing collaboration, training of partner networks to increase Qt awareness, promotion and indirect sales.	Development and support of various partner products, budgeting, future tactics and strategy for product and demo development.	Continuous development	Yes

	Stakeholder engagement methods	Purpose of engagement	Impacts on strategy and stakeholder relations	Planned measures	Informing the administrative, management and supervisory bodies
<b>Open source community</b>	Qt Forum/Community	Thorough testing of releases, community-enabled achievement of commercial readiness as quickly as possible by ensuring stability, versatility and quality.	Bug fixes, new product releases and new product ideas for research and development.	Continuous development	No
<b>Shareholders</b>	Interim reports and financial statement bulletin, Annual General Meeting.	Sharing information to shareholders about Qt's operations and results.	Shareholders have voting and decision-making power over the proposals discussed at the Annual General Meeting.	Continuous development	No
<b>Holders of educational institution licenses</b>	Cooperation through Qt's University & Talent Network: for example, visiting lectures, guidance and mentoring of student projects or event sponsorship according to the needs of the university.	Close cooperation with universities and students promotes the growth of the Qt ecosystem and the number of skilled Qt users, thereby improving the coverage of Qt's products, and reaching future employees.	Regular reporting to product managers. Students receive information about job vacancies at Qt and in customer companies.	Expanding Qt's University & Talent Network over the next three years (including an annual event and increasing global visibility).	No
<b>External consultants</b>	E-mail, monthly and quarterly contact calls, office visits, procurement expert visits to partners' offices annually.	Increasing business and visibility for both parties (suppliers and Qt Professional Services) and strengthening the Qt ecosystem.	Improvement of contracts and price negotiations (regular meetings), maintaining and developing trust and long-term business relationships, better understanding of the supplier's operations (audits).	Continuous development	Yes

Qt has engaged all of the above-mentioned stakeholders as part of the double materiality analysis.

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

In its double materiality assessment that was completed in 2024, Qt identified material sustainability impacts, risks, and opportunities related to its own workforce (S1), external consultants (S2), business conduct (G1), and data protection (entity-specific). They are presented in section IRO-1. The most significant impacts, risks, and opportunities are related to Qt's own workforce and business conduct in its own operations. External consultants are employees of Qt's service providers who typically provide support in the deployment of products and services in the downstream value chain. Data protection is related to Qt's subcontracting chain and the users of its products.

Of the material impacts, risks, and opportunities identified by Qt, the failure of data protection is a significant business risk that could have significant effects on the company's business.

Qt Group integrated sustainability risks into its risk management during 2025. In connection with the integration process, Qt identified certain challenges in the systematic monitoring of sustainability impacts and opportunities as part of risk management, and the company is therefore considering preparing a separate sustainability program in 2026.

The material impacts on people identified by Qt are described in more detail in the sections of Own workforce (S1) and Workers in the value chain (S2). Qt has not identified any material positive or negative impacts related to the environment.

Qt's strategy is focused on business expansion and the creation of long-term growth opportunities. The company invests in growth, particularly in product development, sales, and the innovation of new solutions. The impacts on the company's own workforce are linked to the strategy, as Qt's employees who perform expert work implement the strategy in practice. The impacts related to workers in the value chain are also partly related to Qt's business model. Data protection, i.e. identified sustainability risks, plays a significant role in all of Qt's business operations. A more detailed assessment of the relationship between impacts, risks and opportunities and the strategy has not been carried out, and they have not yet been taken into account in strategy processes. The relationship of impacts and opportunities to the company's strategy will be examined in more detail as part of the double materiality assessment to be updated in 2026.

Qt's own operations affect its own workforce, corporate culture, and data protection. Impacts on external consultants (workers in the value chain) occur through business relation-

ships. The external consultants are employed by Qt's contracted service provider.

Qt's material risks or opportunities have not had a significant effect on its financial position, result, or cash flows. The risks and opportunities have also not been identified as involving significant risks concerning the adjustment of assets. Qt has not conducted a separate resilience analysis on the company's capacity to address its material impacts and risks or to take advantage of its material opportunities.

The double materiality analysis completed in 2024 was still valid during the reporting year. However, Qt Group's organizational structure and scope of operations have increased as a result of the IAR acquisition on October 17, 2025. Although no new Group-level material topics are expected to arise from the acquisition, the double materiality analysis (DMA) will be updated in the first quarter of 2026 to ensure that the new operations, risks, and opportunities are appropriately addressed.

Qt Group carried out a climate scenario and resilience analysis in the fourth quarter of 2025. Climate-related impacts, risks, and opportunities will also be reassessed as part of the 2026 update of the double materiality analysis.

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

Qt Group's material sustainability impacts, risks, and opportunities were identified in a double materiality analysis that began in late 2023 and was completed in the second quarter of 2024. The project team included representatives from Qt's various functions (e.g. People & Culture, legal, finance, procurement, communications), and the progress of the project was regularly communicated to the Management Team and the Audit Committee.

In the assessment, the preliminary negative and positive impacts were first comprehensively assessed on the basis of all ESRS sub-topics and sub-sub-topics based on background material (including trend reports, benchmarking and ESRS standards) and internal interviews. The risks and opportunities in Qt's value chain were then assessed.

In the preliminary assessment, a wide range of perspectives related to the environment, human rights and business conduct were assessed in Qt's own operations and the value chain, related to, for example, pollution, water and marine resources, biodiversity and the circular economy, as well as corruption and bribery.

The initial survey was submitted to the Management Team for assessment. Based on the Management Team's assessments, a framework was created for a survey to be sent to stakeholders concerning sub-topics under the following themes: E1

Climate change, S1 Own workforce, S2 Workers in the value chain and G1 Business conduct, as well as the entity-specific disclosure theme of data protection. The stakeholder survey respondents included representatives of Qt's key stakeholders in the upstream and downstream value chain, i.e. employees, the open source community, customers, subcontractors/business partners, educational institutions, Qt's Board of Directors, owners and analysts. The material topics were determined on the basis of the stakeholders' responses and the management's assessment. A larger weight was assigned to the views of the Management Team.

For negative impacts, each of the variables related to severity (scale, scope and remediability) were assessed on a scale of 1–5, which meant that the maximum value for severity was 15. Likelihood was also assessed on a scale of 1–5, with an actual impact already taking place assigned a value of 15. The likelihood of an impact was assigned the highest score if the impact was identified as already occurring (actual impact). For positive impacts, the scale, scope and likelihood were assessed on the same scale of 1–5. With regard to scale, the extent or severity of the impact on people, the environment or society was assessed, ranging from catastrophic (negative impact) or high significance (positive impact) to insignificant impact. The severity of the impacts related to business conduct was assessed on the basis of whether the impact increases (positive impact) or reduces (negative impact) trust in the industry among the general public.

With regard to scope, the geographical coverage (local–global) and/or the number of people affected were examined. The irremediable character of the impact was assigned the lowest score if the impact was assessed to be easily remediated, and the highest score if, for example, environmental damage or effect on human health cannot be remediated.

The assessment of impacts was followed by an assessment of the financial risks and opportunities that are associated with the sustainability topics or which may be caused by Qt's impacts on people and the environment, for example.

For financial risks and opportunities, their likelihood and effects on future cash flows were assessed. The effects on cash flows were assessed from three different perspectives: effects on business relationships, resources (e.g. prices, availability) and other effects on cash flows.

The materiality of the impacts, risks and opportunities was determined by calculating the total value of the variables and dividing it by the maximum value. The threshold value was defined as 2.0. Topics for which the score was 2.0 or higher were assessed to be material. The company has adjusted the materiality values and threshold value of the material sustainability themes published in the 2024 Sustainability Statement.

## Qt's material sustainability themes

Own workforce (S1)	Topic	Type	Time horizon	Materiality value
Working conditions	Secure employment	Positive impact	Short-term	3.4
Working conditions	Working time	Positive impact	Short-term	3.4
Working conditions	Adequate wages	Positive impact	Short-term	2.8
Working conditions	Social dialogue	Positive impact	Short-term	2.5
Working conditions	Work-life balance	Positive impact, opportunity	Short-term, medium-term	4.2
Working conditions	Health and safety	Negative & positive impact	Short-term	2.9
Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	Positive impact, opportunity	Short-term	3.3
Equal treatment and opportunities for all	Training and skills development	Positive impact, opportunity	Long-term	2.8
Equal treatment and opportunities for all	Measures against violence and harassment in the workplace	Positive impact	Short-term	3.2
Equal treatment and opportunities for all	Diversity	Positive impact, opportunity	Medium-term, long-term	3.2
Other work-related rights	Privacy	Negative & positive impact, risk, opportunity	Short-term	3.1
<b>Workers in the value chain (S2)</b>				
Working conditions	Health and safety	Negative & positive impact	Short-term, medium-term	2.1
<b>Business conduct (G1)</b>				
	Corporate culture	Negative & positive impact, opportunity	Short-term, medium-term	3.1
Corruption and bribery	Prevention and detection, including training	Negative & positive impact, opportunity	Medium-term, long-term	3.8
Corruption and bribery	Incidents	Negative impact	Medium-term	2.1
Entity-specific	Data protection	Positive impact, risk	Short-term	4.1

The double materiality assessment covered Qt Group's entire value chain and all geographical areas, either through the company's own operations or through business relationships. The double materiality assessment will be updated on a regular basis to reassess the material impacts, risks, and opportunities.

Qt's Management Team has been closely involved in identifying and assessing the materiality of sustainability impacts, risks, and opportunities, and the Board's Audit Committee has discussed the progress of the process of identifying and assessing sustainability impacts, risks, and opportunities, i.e. all impacts, risks, and opportunities as a whole. The Board of Directors reviews and approves the identified impacts, risks, and opportunities.

### **Description of the processes to identify and assess material climate-related impacts, risks and opportunities**

Climate-related impacts, risks, and opportunities have been identified and assessed as part of Qt's double materiality analysis. On a preliminary basis, the following were identified as potential impacts: the role of Qt's products in the development of technologies and products that support climate change adaptation (positive impact), CO<sub>2</sub> emissions in the value chain (emissions caused by procurements and the use of products, negative impact) and the energy consumption of Qt's offices (negative impact). However, they did not exceed the materiality threshold value in the Management Team's assessment or stakeholder survey, and, consequently, did not emerge as material themes.

The identification of climate impacts is based mainly on the energy consumption data of Qt's offices (Scope 2 emissions) and, in part, emissions data on business travel (Scope 3 emissions). Based on Qt's business model, the most significant part of the value chain's CO<sub>2</sub> emissions can be estimated to arise in the upstream and downstream value chain. However, it is difficult — or even impossible — to collect reliable information about these steps, especially the use of the products, as customers can use Qt's products in many different ways as an applied component of different devices, services or products.

In the preliminary evaluation of the double materiality assessment, the identified potential risks were physical risks caused by climate change (flood, extreme heat, storms, landslides) in production facilities in the value chain, and logistics problems in supply chains caused by shortages of raw materials due to climate change. The identified transition risks were rising energy prices and stricter climate regulations, which may increase costs related to calculating and reducing the carbon footprint, for example.

However, the physical or transition risks did not exceed the materiality threshold in the Management Team's assessment or stakeholder survey. The analysis did not take climate scenarios into account or assess the sensitivity of the business to risks in more detail.

Qt Group carried out a climate scenario and resilience analysis in the fourth quarter of 2025. The analysis was based on the TCFD framework and looked at transition risks and physical risks in high and low warming scenarios (IPCC). Qt will describe the analysis and its results in more detail in the 2026 Sustainability Statement. Climate-related impacts, risks, and opportunities will be reassessed as part of the 2026 update of the double materiality analysis.

### **Description of the processes to identify and assess material pollution-related impacts, risks, and opportunities**

The impacts, risks, and opportunities related to pollution have been identified and assessed as part of the double materiality analysis. In the assessment, the impacts, risks, and opportunities in Qt's supply chain were comprehensively assessed on the basis of all ESRS sub-topics and sub-sub-topics (including microplastics, air, water and soil pollution, substances of concern), firstly on the basis of background materials and interviews.

The recycling of IT hardware used by Qt in its activities was identified as a potential impact on a preliminary basis. An assessed potential negative impact was the emission of lead contained in hardware into the environment if decommissioned equipment is not recycled appropriately. The recycling of end-of-life IT equipment was also identified as a positive impact, as Qt's offices around the world are committed to recycling appropriately. The rise in prices of IT hardware if very harmful substances, such as lead, are banned was identified as a risk. No financial opportunities were identified. However, none of these exceeded the materiality threshold in the Management Team's assessment or the stakeholder survey.

Members of the affected communities were not separately consulted for the assessment. No material impacts, risks or opportunities related to pollution were identified.

### **Description of the processes to identify and assess material water and marine resources-related impacts, risks, and opportunities**

Impacts, risks, and opportunities related to water and marine resources have been identified and assessed as part of the double materiality analysis. The consumption of clean water at Qt's offices was identified as a potential impact on a preliminary basis. An increase in the price of clean water used at Qt's offices was identified as a risk. However, neither of these exceeded the materiality threshold in the Management Team's assessment or the stakeholder survey.

No significant impacts, risks or opportunities related to water and marine resources, i.e. surface and groundwater consumption, water withdrawals and discharges of water were identified in Qt's value chain. Dependencies related to marine resources were also not identified.

Members of the affected communities were not separately consulted for the assessment.

### **Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, and opportunities**

Biodiversity and ecosystem-related impacts have been identified and assessed as part of the double materiality analysis. The assessment examined how the company promotes direct drivers of biodiversity loss (e.g. climate change, land-use change, freshwater use change, sea-use change, invasive species, pollution), and impacts on the state of species, ecosystems, and ecosystem services.

The connection between the use of natural resources (IT equipment and other procurement) and land-use change and, consequently, biodiversity loss were identified as a potential negative impact on a preliminary basis. However, this did not exceed the materiality threshold in the Management Team's assessment or the stakeholder survey.

Dependencies related to biodiversity and ecosystems have been identified and assessed as part of the double materiality analysis on the basis of background material and interviews. The identified dependencies on ecosystem services included, for example, the natural resources and minerals used in computers and other procurement, and lunches served at the offices.

A more detailed assessment of systemic, transition, or physical risks or opportunities related to biodiversity and ecosystems has not been carried out. Members of the affected communities were not separately consulted for the assessment.

As no material impacts related to biodiversity have been identified, the company has also not found it necessary to implement mitigating measures related to biodiversity.

### **Description of the processes to identify and assess material resource use and circular economy-related impacts, risks, and opportunities**

Qt's resource use and circular economy-related impacts, risks, and opportunities have been identified and assessed as part of the double materiality analysis. The assessment took into account, among other things, the required resources, i.e. their inflows, outflows of resources related to services and products, as well as waste and waste management.

The procurement of IT hardware and peripherals, among others, and waste generated at the offices were identified as potential negative impacts on a preliminary basis. Rising prices of hardware and recycling were identified on a preliminary basis as a potential risk, while cost savings achieved through efficient recycling were identified as an opportunity. However, none of these exceeded the materiality threshold in the Management Team's assessment or the stakeholder survey, and no resource use and circular economy-related material impacts, risks or opportunities were found in Qt's value chain.

Members of the affected communities were not separately consulted for the assessment.

### **Disclosure Requirements in ESRS covered by the undertaking's sustainability statements (IRO-2)**

Climate change (E1) was not identified as a material theme for Qt. The conclusions were drawn on the basis of several factors. According to the view of the company's top management and stakeholders, climate change and energy consumption were assessed as the least important among the topics assessed. In addition, Qt Group already takes the climate impacts of energy use into account in many different ways. The company only uses data center providers, such as Equinix, which have ambitious sustainability targets, and Qt uses the low-carbon cloud service of Amazon Web Service (AWS). Qt's offices are located in modern buildings located in urban areas. The buildings have infrastructure designed for energy saving, waste sorting facilities and good public transport connections. Although charging Qt's products consumes electricity, it has only a minor impact on the energy consumption of the end-use of the products.

The process to identify and assess material impacts, risks and opportunities is described in General disclosures ESRS 2 section IRO-1.

A list of datapoints and their locations in the report is reported on pages 66–67.

# EU Taxonomy

*Commission Delegated Regulation (EU) 2026/73 also provides the possibility to apply the EU Taxonomy regulation applied in 2024 sustainability reporting (covering Commission Delegated Regulation (EU) 2021/2139), the supplementary Delegated Climate Regulation (Commission Delegated Regulation (EU) 2022/1214), the Delegated Environmental Regulation (Commission Delegated Regulation (EU) 2023/2486) and the Amendments to the Delegated Climate Regulation (Commission Delegated Regulation (EU) 2023/2485) to sustainability reporting for the financial year 2025. This option has been used in taxonomy reporting for the financial year 2025.*

## General Disclosures

The EU Taxonomy is a classification system designed to direct funding to activities that significantly contribute to the achievement of environmental objectives. Qt Group is obligated to disclose the share of turnover, capital expenditure and operating expenditure that is identified as potentially environmentally sustainable economic activity in the taxonomy or meets its technical assessment criteria.

The current taxonomy includes six environmental objectives. In order for an activity to be taxonomy-eligible, it must complete the description of the economic activity included in the taxonomy. In order for an activity to be taxonomy-aligned, it must be considered to significantly contribute to at least one of the six environmental objectives in addition to being taxonomy-eligible without causing significant harm to other objectives.

Qt Group has assessed the taxonomy eligibility and alignment of the Group's operations. The objective of this process is to identify potentially taxonomy-eligible activities and to review the technical assessment criteria for each environmental objective for all relevant economic activities. Qt Group has not identified taxonomy-eligible economic activities, and therefore the company has not identified any activities whose taxonomy alignment could have been determined.

As the EU taxonomy continues to be developed, Qt Group continuously monitors its operations in relation to the taxonomy reporting requirements. New activities in accordance with the criteria of the new environmental objectives in future versions of the taxonomy may affect the taxonomy eligibility and alignment of Qt Group's operations, in which case compliance with the criteria will be reassessed.

## Taxonomy eligible turnover

Based on the review of the economic activities currently included in the taxonomy classification, Qt Group's business is included in activity 8.2 Computer programming and consulting services and related activities (NACE J62) of the European Commission's Delegated Regulation (2021/2139). Activity 8.2 is not defined as an enabling activity in the taxonomy. According to the company's estimate, 0% of the company's turnover is taxonomy-eligible under the current taxonomy and 100% is non-eligible. In addition, 0% of the company's turnover is taxonomy-aligned and 100% is non-taxonomy-aligned.

## Taxonomy eligible capital expenditures

Qt Group has specified operating expenditure (denominator), EUR 174.3 million. Operating expenditure includes the company's operating expenses during the financial year. According to the company's estimate, 0% of the company's business expenses are taxonomy-eligible under the current taxonomy and 100% are non-eligible. In addition, 0% of the company's operating expenses are taxonomy-aligned and 100% are non-taxonomy-aligned.

## Taxonomy eligible operating expenditures

Capital expenditure included in the taxonomy assessment is defined as: increases in tangible and intangible assets during the financial year before depreciation, amortization and revaluations, including revaluations due to changes in valuation and impairment during the financial year and excluding changes in fair value.

According to Qt Group's estimate, 0% of capital expenditure is taxonomy-eligible under the current taxonomy and 100% is non-eligible. In addition, 0% of the company's capital expenditure is taxonomy-aligned and 100% is non-taxonomy-aligned.

The required information is shown in the tables on the following pages.

# Environmental Information

## Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

TURNOVER, FINANCIAL YEAR 2025

	2025		Substantial contribution criteria						DNSH criteria					Minimum safeguards	Proportion of taxonomy aligned (A.1) or eligible (A.2) turnover, year 2024	Category "enabling activity"	Category "transitional activity"	
	Code	Turnover, MEUR	Proportion of turnover, 2025	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution					Circular economy
<b>Economic activities</b>																		
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																		
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																		
No activity		0	0%														0%	
Turnover of environmentally sustainable activities (taxonomy-aligned) (A.1)		-	0%	0%	0%	0%	0%	0%	0%								0%	
Of which Enabling		0	0%	0%	0%	0%	0%	0%	0%								0%	E
Of which Transitional		0	0%	0%													0%	T
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																		
No activity		0	0%														0%	
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		-	0%	0%	0%	0%	0%	0%	0%								0%	
<b>A. Turnover of Taxonomy eligible activities (A.1 + A.2)</b>		-	0%	0%	0%	0%	0%	0%	0%								0%	
<b>B. TAXONOMY-NON ELIGIBLE ACTIVITIES</b>																		
Turnover of Taxonomy-non-eligible activities		216.3	100%															
<b>TOTAL (A+B)</b>		<b>216.3</b>	<b>100%</b>															

CAPITAL EXPENDITURE (CAPEX), FINANCIAL YEAR 2025

	2025			Substantial contribution criteria					DNSH criteria					Minimum safeguards	Proportion of taxonomy aligned (A.1) or eligible (A.2) CapEx, year 2024	Category "enabling activity"	Category "transitional activity"	
	Code	CapEx	Proportion of CapEx, 2025	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution					Circular economy
<b>Economic activities</b>																		
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																		
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																		
No activity		0	0%														0%	
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		-	0%	0%	0%	0%	0%	0%	0%								0%	
Of which Enabling		0	0%	0%	0%	0%	0%	0%	0%								0%	E
Of which Transitional		0	0%	0%													0%	T
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																		
No activity		0	0%														0%	
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		-	0%	0%	0%	0%	0%	0%	0%								0%	
<b>A. CapEx of Taxonomy eligible activities (A.1 + A.2)</b>		-	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>	<b>0%</b>								<b>0%</b>	
<b>B. TAXONOMY-NON ELIGIBLE ACTIVITIES</b>																		
CapEx of Taxonomy-non-eligible activities		217.5	100%															
<b>TOTAL (A+B)</b>		<b>217.5</b>	<b>100%</b>															

OPERATING EXPENSES (OPEX), FINANCIAL YEAR 2025

	2025			Substantial contribution criteria					DNSH criteria					Minimum safeguards	Proportion of taxonomy aligned (A.1) or eligible (A.2) OpEx, year 2024	Category "enabling activity"	Category "transitional activity"	
	Code	OpEx	Proportion of OpEx, 2025	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution					Circular economy
<b>Economic activities</b>																		
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																		
<b>A.1 Environmentally sustainable activities (taxonomy-aligned)</b>																		
No activity		0	0%														0%	
OpEx of environmentally sustainable activities (taxonomy-aligned) (A.1)		-	0%	0%	0%	0%	0%	0%	0%								0%	
Of which Enabling			0%	0%	0%	0%	0%	0%									0%	E
Of which Transitional			0%	0%													0%	T
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																		
No activity		0	0%														0%	
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		-	0%	0%	0%	0%	0%	0%									0%	
<b>A. OpEx of Taxonomy eligible activities (A.1 + A.2)</b>		-	0%	0%	0%	0%	0%	0%									0%	
<b>B. TAXONOMY-NON ELIGIBLE ACTIVITIES</b>																		
OpEx of Taxonomy-non-eligible activities		174.3	100%															
<b>TOTAL (A+B)</b>		<b>174.3</b>	<b>100%</b>															

**NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES**

<b>Row</b>	<b>Nuclear energy related activities</b>	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
<b>Row</b>	<b>Fossil gas related activities</b>	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

# Social Information

## Own workforce (S1)

### Interests and views of stakeholders (SBM-2 disclosure requirement)

The views, rights and interests of the company's own workforce are discussed in the General Disclosures (ESRS 2) section Interests and views of stakeholders (SBM-2).

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

Qt's own workforce mainly consists of employees. The definition of the company's own workforce is also met annually by individual freelance consultants, and they are subject to the same rules as external consultants (see S2 workers in the value chain). In addition, Qt had a few people in recruitment and assistant positions through a temporary agency in 2025. Individual freelancers or temporary agency workers are not included in the reporting of information on the company's own workforce.

All of the company's employees are subject to material impacts. Qt's employees work in expert duties and there are no significant differences in the type of work they perform. Qt has not separately identified types of employees that would be particularly vulnerable to negative impacts.

Fatigue and work ergonomics were identified as potential negative impacts on the company's own workforce. They have not been identified as widespread or systemic, but as individual incidents.

All of Qt's employees are subject to material positive impacts: early support and comprehensive occupational health care and/or insurance, secure employment, adequate wages, good work-life balance and the promotion of diversity. In all of Qt's operating countries, employees have access to comprehensive health and well-being services and/or insurance, which means that employees have quick access to services also on a preventive basis.

Financial opportunities identified in the double materiality analysis from the employees' perspective included good work-life balance, skills development, gender equality and equal pay, and promoting diversity, equality and inclusion globally. The identified risk was protecting the privacy of employee data. These are all closely linked to Qt's material positive and negative impacts. Qt Group's operations do not involve a risk of child labor or forced labor. The employees are highly educated and/or specialists engaged in demanding expert duties.

Of the material impacts, risks, and opportunities, the development of employees' skills and the strengthening of corporate culture have been particularly highlighted in Qt's strategy.

Qt's strategic goal is to attract, develop, and retain top talent as Qt's employees.

### Policies related to own workforce (S1-1)

Qt's Code of Conduct regulates the following impacts, risks, and opportunities related to the company's own workforce: work-life balance, social dialogue (job satisfaction), health and safety, gender equality and equal pay, measures against violence and harassment, and the diversity of the personnel. The Code of Conduct is described in more detail in the Business conduct (G1) section.

Qt's methods of engagement with their own workforce are discussed in more detail in the General disclosures (ESRS 2) section Interests and views of stakeholders (SBM-2).

### Secure employment and employee turnover

Qt aims to promote employment security by offering its employees mainly employment contracts valid until further notice (93% in 2025) and by complying with local labor laws.

### Work-life balance

Qt's hybrid work guidelines published in 2025 support employees' work-life balance and flexible working life. The general guideline for hybrid work is that one can work remotely two days a week. Managers are responsible for planning office and remote days with their own teams. For a new employee, it is recommended to work at the office 4–5 days a week for

the first 3 months to ensure a smooth onboarding. Employees have had the opportunity to comment on the hybrid work guidelines, the implementation of which is the responsibility of the People & Culture team. Work-life balance and workload play an important role in employees' performance reviews.

#### **Adequate wages**

Qt pays adequate wages to all of its employees. In order to offer its employees competitive wages, Qt monitors the market averages in the industry in different countries.

#### **Social dialogue (job satisfaction)**

Qt Group's Code of Conduct aims to promote open and constructive interaction in the work community. The Code describes the commitment to an open, inspiring, and equal work environment where employees have the opportunity to reach their full potential and contribute to Qt's vision and goals.

#### **Health and safety**

In its Code of Conduct, Qt is committed to providing a safe and healthy workplace for all employees and to promoting a culture in which everyone takes responsibility for their own safety and that of others. In addition to training on the Code of Conduct, all Qt employees receive country-specific training on occupational health and safety. The occupational safety management system is based on local laws and regulations in

each country. Qt also has an international travel policy set and implemented by the Management Team, aimed at ensuring the safety of employees on business trips.

Qt aims to remediate its human rights impacts, meaning occupational health impacts in particular, by offering occupational health care or insurance to all employees in each of its operating countries. Qt also has an early intervention model in place to encourage employees to raise any problems they notice, such as continuous overtime or lack of motivation, with their manager or the unit's People & Culture representative at an early stage. Employees who wish to report misconduct anonymously can do so via the company's whistleblowing channel. Additional information about Qt's human rights commitments and processes for monitoring them is provided in the section Business conduct policies and corporate culture (G1-1).

#### **Diversity & gender equality, and equal pay**

The promotion of diversity involves, in addition to the Code of Conduct, the Qt career framework, which applies to all Qt employees and specifies the competencies required for each position, and the pay for each position. The purpose of the career framework is to create a transparent framework for career development and remuneration, i.e. to promote equal pay for equal work regardless of the employee's background and gender. Qt Group's Management Team is responsible for

the approval and implementation of the career framework. The career framework is available to all employees on the company's intranet.

In its Code of Conduct, Qt commits to offering equal opportunities for personal growth and career development, regardless of ethnic origin, religion, age, nationality, regardless of gender identity, disability, sexual orientation, political opinions, or other personal characteristics. Qt does not tolerate sexual, physical, or psychological violence or harassment or any form of discrimination, abuse, intimidation, or workplace bullying. Qt has not separately defined vulnerable groups. Instead, the principles apply to everyone.

#### **Prevention of discrimination and harassment**

Discrimination is prevented primarily by educating employees on the Code of Conduct and the whistleblowing channel, and by providing training to managers. The recruitment team and managers are instructed to interview candidates based on each applicant's competence. Managers are responsible for ensuring that employees are treated equally.

Discrimination or inappropriate behavior can be reported anonymously via Qt's whistleblowing channel. All suspected misconduct is investigated and addressed. Qt also carries out an annual job satisfaction survey and, in 2024, the survey was amended to include a question on whether employees

have experienced harassment at the workplace. The survey results are used to create an action plan for addressing areas that require further development.

### **Training and skills development**

Training and skills development are taken into account in Qt's global employee handbook, which applies to all Qt employees. The handbook provides a framework for promoting continuous learning from an employee's perspective. The handbook includes, among other things, instructions and tips related to on-the-job learning, an employee-specific training budget, and a selection of e-learning. The handbook also encourages employees to talk to their manager about training.

Qt also has its own learning platform, Qurious. Managers have access to various online training modules and the opportunity to participate in, for example, the 360-degree feedback process, which aims to help managers identify their strengths and development areas, and develop their leadership skills. The global employee handbook and its country-specific versions are available to all employees on Qt's intranet. Qt Group's Management Team is responsible for the approval and implementation of the employee handbook.

### **Employee data protection**

Employee privacy is governed by Qt's Employee Privacy Note, which applies to all Qt employees. The note precisely specifies the information Qt collects on its employees and for what purposes, what information is not collected, and the rights of the employees. Qt's General Counsel is responsible for the implementation of the privacy note.

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

Employees' views of Qt as an employer and workplace are surveyed annually by means of an extensive personnel survey (employee Net Promoter Score eNPS & engagement survey). The survey investigates how employees perceive, for example, communication and giving feedback, well-being at work, the meaningfulness of work, workload, learning and self-development opportunities, leadership, and work ergonomics at Qt.

The results of the annual survey are reported to the Group Management Team and each business function's management team, where they are reviewed and action plans are drawn up at both the company level and the team level. The results of the survey are also communicated to employees at a company-wide briefing and through internal communication channels. The results also include action plans that have been created based on the results of the survey.

In addition to the annual survey, Qt conducts a pulse survey three times a year to obtain up-to-date information on the well-being and sentiments of the personnel.

Employees are informed of the company's key updates in quarterly briefings and via the intranet. Communication takes place directly with employees at both the organizational level and the team level. In addition, Qt has statutory employee representatives in Finland, Norway, France, Germany, and Japan. Discussions with the employee representatives are carried out in accordance with local legislation.

Qt started developing internal communications in late 2024 as a response to the need to clarify communications practices. Under the leadership of Communications and IT, the key communication channels were upgraded, new operating methods were introduced, and guidelines were drawn up to make the flow of information clearer and more uniform globally. The reforms were implemented in spring and early summer 2025, and Qt's employees from different areas were extensively involved. The latest measurements show a slight increase in satisfaction with communications.

During 2025, Qt added training for middle management to strengthen managers' communication skills, such as listening leadership, constructive feedback, building coopera-

tion relationships, and clear and inspiring communication of the strategy.

The SVP of People & Culture (a member of the Management Team) has operational responsibility for communicating the annual personnel survey and the quarterly pulse surveys and for ensuring that the feedback from the personnel is taken into account.

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

Qt has recognized that negative impacts on employee health, such as mental health and work ergonomics, are likely. The company aims to prevent and remediate these impacts by, for example, training supervisors to identify the impacts, arranging regular personal discussions between employees and managers, and assigning a dedicated People & Culture representative for each business unit, who can be contacted with a low threshold. In each of Qt's operating countries, employees have access to either occupational health services or insurance, as well as separate mental health services and/or an early support model.

Employees can, depending on the country, report concerns to shop stewards, the unit's People & Culture representatives or to the occupational health care provider either through

its online service or at an in-person appointment. In some of Qt's operating countries, employees can also use the services of psychologists and psychiatrists as part of occupational health care.

Misconduct and other issues can be reported anonymously via a whistleblowing channel that is managed by a third party. Reports received via the whistleblowing channel are immediately communicated to the General Counsel, the CFO and the SVP of People & Culture, and the processing of all whistleblower reports starts within seven days of the report being made. More information about the whistleblowing channel is provided in the Governance disclosures section (G1-1).

These various channels are communicated to the employees as part of manager briefings, through the intranet and occupational health care, and through shop stewards, and in lectures by work ability consultants and on the Qurious e-learning platform. Qt engages in regular dialogue with employees and the occupational health care provider, thereby monitoring employee concerns. The employees' awareness of the existence of the various structures and channels is not assessed separately.

## **Sustainability measures related to own workforce (S1-4)**

Qt Group's goal is to strengthen the positive impacts of material sustainability themes related to the company's own workforce. In addition, preventive efforts have been made to mitigate or prevent the occurrence of identified negative impacts related to health and safety and employee data protection. During 2025, Qt focused on promoting the following measures:

### **Secure employment and employee turnover**

Qt aims to improve employee engagement, particularly by developing leadership, providing opportunities for growth and learning at work, and by providing additional training. In 2025, Qt increased manager training for both basic and advanced manager levels. The systematization of the training as part of the annual plan has started and will continue during 2026.

### **Work-life balance**

Qt aims to support the employees' well-being and ability to cope with the demands of work by enabling flexible working hours and hybrid work. Qt Group's hybrid work guidelines were published in 2025 and have been implemented by teams and in different operating countries. Qt uses flexible working hours, which enables flexible working hours at the start and end of the working day, for example. Shortened working hours can also be negotiated at the employee's initiative in special situations.

### **Adequate wages**

Qt is committed to paying fair and competitive wages to its employees. To ensure this, Qt carries out an annual wage survey in which Qt's wage level is compared with market data and the wage levels are reviewed and, if necessary, modified on a role-specific basis.

### **Social dialogue (employee satisfaction)**

Qt conducts an annual employee satisfaction survey, the results of which are discussed in the management teams of the company and the various units. Based on the results, action plans are drawn up at all levels of the organization, including team-specific plans. In addition to the annual survey, a pulse survey has been developed since 2025 to provide more up-to-date feedback from employees. Pulse surveys are conducted three times a year.

### **Health and safety**

In each of Qt's operating countries, Qt's employees have access to either occupational health services or insurance and an early support model. In addition, some operating countries use separate mental health services. In order to raise awareness of the services available, Qt provided training on the early support model and mental health support tools to managers in EMEA in 2025. The mental health discussion aid available to all employees has received good feedback, and its use was increased during 2025. The manager course on the

early support model was added to the Qurious platform for use by all managers during 2025. In Qt's operating countries, separate health examinations are also in use, especially with regard to mental health.

### **Gender equality and equal pay**

In order to promote equal pay, Qt uses a career framework, the purpose of which is to create a transparent framework for career development and pay. The path defines the competence required for each position and the pay based on it. In addition, Qt has prepared for the implementation of the EU's Wage Transparency Directive in 2025 by, for example, clarifying the definitions of different wage categories.

### **Employee diversity**

To strengthen diversity, equity and inclusion (DEI), Qt revised and harmonized its recruitment processes in 2025. The company introduced a new recruitment system that also facilitates globally uniform structured processes. The job advertisement templates were also revised to ensure an inclusive language, role-specific assessment forms were added to support equal candidate evaluation, and recruitment channels were expanded to reach a more diverse talent pool. In addition, the Talent Acquisition team and recruiting managers were trained to reduce recruitment bias. In addition, Qt began to systematically collect the experiences of jobseekers to support development work.

The integration of DEI perspectives into recruitment and leadership will be deepened in 2026. Training for managers and interviewers will continue, and the Talent Acquisition team will be strengthened especially with regard to inclusive communication and the practical application of DEI themes. The candidate experience and inclusion are developed in events organized four times a year. In addition, DEI will be incorporated into employer branding activities and university collaborations, and junior programs will be expanded to strengthen organizational diversity.

#### **Measures against violence and harassment in the workplace**

In 2025, Qt launched a training program for managers in response to the employees' feedback on workplace behavior and interaction situations. The aim of the training is to strengthen open dialogue, provide managers with tools for constructive feedback processing, and support them in resolving challenging situations. The first trainings were conducted at several locations in EMEA, and the program will be expanded to other regions during 2026.

If incidents related to harassment arise, for example, in open feedback from employee satisfaction surveys, they are forwarded to Qt's local People & Culture teams for processing. Employees are encouraged to report inappropriate situations they have experienced with a low threshold.

#### **Training and skills development**

In order to support the competence and career development of employees, a development discussion is held once a year for each employee. The discussions assess the employee's current role as well as career development goals and opportunities. In addition to the development discussions, the aim is to maintain continuous active dialogue between the manager and the employee.

To support the career development of managers, Qt uses a global career path that defines career levels based on experience and competence and serves as a general model for employees to better understand the career opportunities available. Employees also have access to training material on the Qurious learning platform. In 2025, the Qurious portfolio was expanded with several technical courses and other selected training courses.

#### **Employee data protection**

In 2025, Qt launched an extensive Data Governance project that surveys the current state of data management in different business units and also identifies development areas related to employee data protection, such as access rights management and the processing of documents containing personal data. The work will continue in 2026, when the improvements found will be implemented both unit-specifically and at the entire organizational level.

#### **Sustainability targets related to own workforce (S1-5)**

Qt has not set measurable result-oriented targets related to the management of material impacts, risks, and opportunities related to its own workforce. Qt's plan was to set targets in the second half of 2025, but due to the IAR acquisition that began in July 2025, the company decided to postpone the setting of targets. The aim is to set targets in accordance with the minimum disclosure requirements by the end of 2026, and the setting of relevant targets will be assessed separately for each material impact, risk, and opportunity.

However, Qt monitors the impacts, risks, and opportunities related to its own workforce in different ways.

## Qt's material sustainability themes

Material sustainability topic	Monitoring	Target level	Base period for monitoring
Secure employment	<ul style="list-style-type: none"> <li>Employee turnover in relation to the industry trend</li> <li>Internal tool</li> </ul>	-	Monthly
Work-life balance & working hours	<ul style="list-style-type: none"> <li>Hybrid work instructions</li> <li>Weekly working hours recorded in employment contracts</li> <li>Up-to-date working time monitoring and process in some countries</li> <li>Process for handling the results of the job satisfaction survey</li> </ul>	Local legislation regarding working hours	Working time monitoring by country, annual job satisfaction survey
Adequate wages	<ul style="list-style-type: none"> <li>A wage survey in which Qt's wage level is compared with market data and the wage levels are reviewed and, if necessary, modified on a role-specific basis</li> </ul>	All employees (100%) are already paid adequate wages.	Annually
Social dialogue	<ul style="list-style-type: none"> <li>Annual job satisfaction survey and pulse surveys</li> </ul>	General satisfaction index as a guiding reference	Quarterly
Health and safety	<ul style="list-style-type: none"> <li>Early support model in EMEA and North America</li> <li>Country-specific monitoring based on occupational health and/or insurance reports</li> </ul>	Trends, local legislation	Annually
Gender equality and equal pay for equal work	-	-	-
Training and skills development	<ul style="list-style-type: none"> <li>Data on the Qurious training platform (e.g. course completion rate by country and unit)</li> <li>Job satisfaction survey</li> </ul>	Monitoring trends and the completion rate of mandatory courses, such as the course on the Code of Conduct and the Security training course.	Real-time data from Qurious, annual job satisfaction survey.
Measures against violence and harassment in the workplace	<ul style="list-style-type: none"> <li>Whistleblower reports</li> <li>Annual job satisfaction survey</li> </ul>	-	As per incident and annually
Diversity	<ul style="list-style-type: none"> <li>Internal promotions and transfers (internal tool)</li> </ul>	-	Continuous monitoring
Privacy	<ul style="list-style-type: none"> <li>Monitoring of e-mails/notifications sent regarding concerns about the employee's personal data</li> </ul>	Legislation	Continuous monitoring

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

### NUMBER OF EMPLOYEES

Region	2024	2025
EMEA	564	659
APAC	120	175
North America	151	124
<b>Total</b>	<b>834</b>	<b>958</b>

Number of employees as the average for the reporting period (number of employees on the last day of each month, added up and divided by 12). The average number of employees in each area is rounded to an integer.

### NUMBER OF EMPLOYEES BY COUNTRY

Country	2024	2025
Finland	259	288
Germany	206	217
United States	120	124

Countries in which the Qt has at least 10% of its total number of employees. Average number of employees for the reporting period.

### EMPLOYEE TURNOVER

	2024	2025
<b>Total number of employees who have left the company*</b>	92	116
<b>Employee turnover**, %</b>	11%	12.1%

\* Total number of employees who left voluntarily or due to dismissal or retirement or who died during employment during the reporting year.

\*\* Number of employees who left the company in 2024 divided by the number of employees for the reporting period (average).

### NUMBER OF EMPLOYEES BY CONTRACT TYPE AND GENDER

Contract type*	Female		Male		Other		Not reported		Total	
	2024	2025	2024	2025	2024	2025	2024	2025	2024	2025
<b>Employees</b>	184	286	649	849	1	1	0	0	834	1,136
<b>Permanent employees</b>	181	264	610	796	1	1	0	0	765	1,061
<b>Temporary employees</b>	20	22	50	53	0	0	0	0	65	75
<b>Non-guaranteed hours employees**</b>	4	1	3	6	0	0	0	0	6	7

\* Number of employees on December 31 in the reporting year. Other figures are based on the number of employees as the average for the reporting period (number of employees on the last day of each month of the year, added up and divided by 12).

\*\* No minimum or fixed number of working hours in the contract.

## Diversity Metrics (S1-9)

AGE DISTRIBUTION OF EMPLOYEES	Under 30 years old		30–50 years old		Over 50 years old		Total	
	2024	2025	2024	2025	2024	2025	2024	2025
<b>Number of employees</b>	131	158	603	756	135	222	869	1,136
<b>%</b>	15%	14%	69%	67%	16%	20%	100%	100%

Situation on December 31 in the reporting year. Percentages rounded to integers.

### Adequate wage (S1-10)

Adequate wages are paid to all (100%) employees. The wages of employees in all of Qt's operating countries have been compared to either the country's minimum wage level or the minimum wage specified in the applicable collective agreement if a national minimum wage has not been established. If the minimum wage varies within the country, the highest minimum wage level is used as the reference value.

### Health and safety metrics (S1-14 )

	2024	2025
Percentage of employees covered by a health and safety management system*, %	100%	100%
Number of fatalities as a result of work-related injuries and work-related ill health	0	0
Number of recordable work-related accidents (including fatalities)	9	5
Recordable work-related accidents per one million hours worked	6.3	3.4
The number of cases of recordable work-related ill health that are subject to legal restrictions on the collection of data	0	0
The number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health	0	3

\* Systems based on legal requirements and/or recognized standards. IAR is not included in the reported figures for occupational health and safety management systems.

The figures apply to employees. Aside from employees, Qt's own workforce only includes a small number of freelancers or temporary agency workers. The relevant information on these individuals is not available. .

## Remuneration metrics (pay gap and total remuneration) (S1-16)

	2024	2025
Gender pay gap among employees	17.2	18.2
Annual total remuneration ratio**	6.5	5.6

IAR is not included in the reported figures.

\* Average gross annual salary of men – average gross annual salary of women, divided by the average gross annual salary of men x 100. Includes part-time employees, temporary employees, and trainees. The hourly wages of temporary employees have been converted into annual salaries.

\*\* Ratio of the highest paid individual to the median annual total remuneration for all employees. This includes the basic salary, bonuses, and some fringe benefits.

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

### NUMBER OF COMPLAINTS RELATED TO OWN WORKFORCE

Type	2024	2025
Incidents of discrimination and harassment reported	1	1
Complaints related to, for example, working conditions and terms of employment, equal treatment and equal opportunities for all, or other work-related rights (child labor, forced labor, privacy)	0	0
Reports made to the National Contact Points for OECD Multinational Enterprises, where applicable	0	0
The total amount of fines, penalties, and compensation for damages as a result of the reported incidents and complaints	0	0
The number of severe human rights violations and incidents connected to the company's own workforce	0	0
The total amount of fines, penalties and compensation for damages relating to incidents of discrimination and harassment	0	0
<b>Total</b>	<b>1</b>	<b>1</b>

Qt Group's anonymous whistleblowing channel reports for the entire year and IAR's anonymous whistleblowing channel reports from October 17 to December 31, 2025.

## Workers in the Value Chain (S2)

### **Material impacts, risks, and opportunities and their interaction with strategy and business model (SBM 3 disclosure requirement)**

In Qt Group's case, workers in the value chain refer to external consultants acting as employees of consulting companies who work remotely, and occasionally at Qt's offices or at the end customer's office, but who do not belong to the company's own workforce, i.e. who are not self-employed persons or temporary agency workers. Qt signs agreements with the employers of the consultants. There were cooperation agreements with approximately 10 service providers in 2025.

The workers in the value chain who work as consultants do not involve a significant risk of child labor or forced labor. The consultants are highly educated and/or specialists engaged in demanding expert duties. No separate groups have been identified among consultants who are particularly vulnerable from the perspective of occupational health and safety, or who are subject to more positive impacts than other groups.

With regard to consultants, challenges related to occupational health and safety, particularly from the perspective of mental health, were identified as a material potential negative impact. The impacts have not been identified as widespread or systemic, but are related to individual incidents.

In time- and material-based contracts, the working time of consultants is limited to a maximum of eight hours per day. The aim is to avoid placing an excessive burden on consultants. In addition, external consultants have the right to take days off and national holidays, which must be planned and confirmed in advance. For other types of contracts, the consultants have the opportunity to organize their working time more flexibly. Aside from these mechanisms and regular dialogue with consultants, Qt has not taken particular measures to manage its impacts on the health and safety of consultants.

Qt has identified sustainable working conditions as a material positive impact related to consultants. Qt provides consultants with a flexible working environment, i.e. opportunities for hybrid and remote work. In-office work is required to some extent, but these requirements are agreed upon before the contract is signed, and separately with the customer during the project.

Material financial risks or opportunities related to workers in the value chain have not been identified.

### **Policies related to value chain workers (S2-1)**

Qt's Code of Conduct guides the impacts on workers in the value chain, meaning external consultants, as regards health and safety and sustainable working conditions. Service providers are required to commit to the Code of Conduct. For contracts lasting longer than one month, consultants are required to complete training on the Code of Conduct. The Code of Conduct is described in more detail in section G1-1 Business conduct policies.

A framework agreement concluded with service providers requires that the service provider commits to respecting human rights and taking care of the health and safety of its employees. The contracts are negotiable with regard to the start date, planned days off and national holidays, for example. In-office work is usually agreed upon in advance with the service provider.

The company that is the service provider represents external consultants in their negotiations and is ultimately responsible for bringing up their views. Qt's project managers engage in discussions with the consultants regularly: on a weekly basis, every two weeks or every two months at a minimum. Procurement specialists engage in discussions with the manager representing the service provider at least once a month. The signing of framework agreements is the responsibility of

the director in charge of professional services and a procurement specialist.

Qt aims to primarily prevent its negative impacts and to engage in continuous dialogue with consultants. The consultants' primary point of contact regarding health-related problems or other problems is their own employer. Consultants can also submit anonymous reports if they observe any violations of Qt's Code of Conduct. In addition, both the service provider company (the consultant's employer) and Qt have the opportunity to terminate the contract if its terms are violated.

Qt has not received any reports of incidents of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises.

### **Processes for engaging with value chain workers about impacts (S2-2)**

Qt communicates with external consultants in many ways. The terms of the work performed (including pricing, start dates, and terms of payment) are negotiated between Qt and the employers of the external consultants. Qt's project manager has monitoring meetings with external consultants on a weekly basis, while the procurement specialist has similar meetings on a monthly and quarterly basis with the consultants' representative. In the meetings, the participants review feedback from the consultants regarding the personnel and projects.

Qt's representatives discuss these matters with the suppliers' primary contact persons. Qt's procurement specialist acts as the primary contact person for the suppliers. The meetings also aim to find ways to resolve any problems. The occupational health of the consultants is the responsibility of their employer.

In Qt's Professional Services unit, project managers report to area directors, and area directors report to the head of the Professional Services unit. For suppliers operating under service partner contracts, the effectiveness of the cooperation and satisfaction are assessed in monthly and quarterly monitoring meetings between the Professional Services business unit's team and the suppliers.

### **Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)**

Contracts continuing for more than one month require consultants to complete Qt's Code of Conduct training. If the contract lasts longer than one year, the training must be repeated. For more information on compliance with the Code of Conduct and the whistleblowing channel, please refer to the Governance disclosures section (G1-1).

As part of the course, consultants also receive information on the whistleblowing channel, which they can also use to anonymously report misconduct or shortcomings.

Topics, including views highlighted by consultants, are discussed in weekly meetings and in management meetings held at two-week and one-month intervals in the Professional Services unit. The agenda of these meetings includes project situation reviews, resource allocation and other matters related to subcontracting.

### **Actions related to value chain workers (S2-4)**

Aside from supplier agreements and terms of contract concerning working hours, for example, Qt has not implemented, and is not planning to implement, any particular measures relating to the health of external consultants. No separate resources have been allocated to managing negative impacts (mental health) related to consultants, because the impacts have been assessed to be potential rather than actual, and they are neither severe nor extensive in scale.

Qt has not identified any material business risks related to workers in the value chain. No serious human rights violations have been reported in relation to Qt's value chain.

### **Targets related to value chain workers (S2-5)**

Qt has not set any targets related to the health of external consultants, nor is the company planning to set such targets for the time being. Setting result-oriented targets is challenging, as Qt does not have visibility due to reasons related to the protection of the privacy of consultants in occupational health.

Qt requires the service provider to commit to respecting human rights and looking after the health and safety of its employees. Consultants can raise concerns through the whistleblowing channel. In 2025, the number of reports was 0 (0 in 2024).

# Governance Information

## Business Conduct (G1)

### **Business conduct policies and corporate culture (G1-1)**

Qt's Code of Conduct lays the foundation for Qt's entire business culture. The company updated the Code of Conduct at the end of 2025 and took into account the needs and expectations of employees, customers, and other stakeholders in the process. In connection with the update, Qt's previously separate human rights policy was integrated into Qt's Code of Conduct. In the Code of Conduct, Qt Group commits to conducting its business in a professional manner with honesty and integrity, and to complying with the highest moral, ethical, and legal standards. Qt is committed to conducting business in accordance with internationally recognized human rights standards, including the UN Guiding Principles on Business and Human Rights (UNGPR).

The Code of Conduct sets out the ethical principles and commitments that guide all of the company's operations. It covers, among other things, compliance with laws and regulations, fair competition, anti-corruption and anti-bribery, respect for human rights, a safe and equal working environment, information security, environmental responsibility, and open and responsible communication.

The Code of Conduct applies to all Qt Group employees, suppliers, and partners in all geographical regions. The purpose of the Code of Conduct is to build trust among stakeholders,

ensure responsible and transparent business models, manage risks, and promote sustainable development. The new Code of Conduct will also be published in local languages in all countries where Qt has an office during 2026.

The monitoring process for compliance with the Code of Conduct is based on several reporting channels, such as the manager, People & Culture, Legal, and the anonymous whistleblowing channel. All reports are processed and investigated according to the defined process. Confidentiality is ensured to the extent possible, and persons who may have a conflict of interest in the incident are disqualified. The whistleblower will not be retaliated against even if the concerns prove unfounded.

The CEO approves the Code of Conduct and is responsible for the implementation of the Code of Conduct. The CFO is responsible for keeping the Code of Conduct up to date and for updating its content as necessary.

The Code of Conduct has been prepared considering the expectations and interests of key stakeholders. For employees, the focus is on ensuring a safe, equal, and respectful working environment and psychological safety. For customers and partners, fair competition, openness, confidentiality, and data protection are emphasized. For suppliers and subcontractors, the policy requires respect for human rights and respon-

sible procurement practices. From the society's and environmental perspective, the policy supports the principles of sustainable development and the reduction of the environmental footprint. For investors, financial reliability and transparent reporting are the key.

The Code of Conduct is closely linked to all of Qt's impacts, risks, and opportunities related to business conduct. The corporate culture guided by the Code of Conduct has been identified as both a positive impact and a business opportunity that drives productivity. On the other hand, there is a possibility of a negative impact on work culture if employees do not feel that they are heard or that they do not fit within the framework of Qt's culture. The Code of Conduct also relates to deficiencies in awareness related to the prevention of corruption and bribery and incidents of corruption and bribery, which have been identified as potential negative impacts. Training in the Code of Conduct, which covers themes related to the prevention of corruption and bribery, was also identified as a positive impact.

In addition, Qt has a separate Anti-Bribery and Corruption Policy, the aim of which is to ensure that Qt Group (Qt) and its subsidiaries around the world comply with all anti-bribery and anti-corruption laws in their respective countries. Qt has zero tolerance for all business practices that are indicative of corruption or bribery. This policy applies to all employees,

partners, and other parties with whom Qt operates. In 2025, Qt updated its anti-corruption policy to be aligned with the UN Convention against Corruption (UNCAC).

All employees receive training on the Code of Conduct as part of their orientation. From 2025, Code of Conduct training will be mandatory for all employees every year. Qt monitors the percentage of employees who have completed the training.

All of Qt's stakeholders have the opportunity to use the whistleblowing channel to anonymously report any observed violations of the Code of Conduct, such as corruption or bribery, the gray economy, or other legal non-compliance. Qt has not separately determined the internal functions that are the most vulnerable to corruption and bribery. Whistleblower reports are submitted via a service maintained by a third party, in which the whistleblower is provided with an anonymous username and password. Information on the channel is provided as part of the training on the Code of Conduct and to external consultants working in customer projects. The channel is public, which means that anyone involved with Qt can use it to report misconduct.

All reports received via the anonymous whistleblowing channel are taken into processing within 7 days, and the whistleblower receives a response within 30 days, as required by law. Reports submitted via the whistleblowing channel are

accessible only to the Group's CFOs, General Counsel and SVP of People & Culture. If necessary, they have the right to discuss the content of the report and the consequences to be decided on with the company's CEO, Management Team, members of the Board of Directors and other parties deemed necessary by the specified persons. Qt instructs that all data security violations, such as phishing attempts, should be reported by email to [security@qt.io](mailto:security@qt.io).

### **Corporate culture development project**

In summer 2024, Qt launched a project aimed at developing the corporate culture. During 2025, Qt invited more than 300 employees and members of the Management Team to several workshops to gain a diverse picture of the company's values, practices and work culture globally, taking into account the local characteristics of all offices and countries.

As a result of the project, Qt published a Culture Handbook in October 2025, which provides guidelines for Qt's day-to-day work and describes the company's target culture. The main target group of the Culture Handbook is the company's employees. The Culture Handbook is to be updated regularly and, for example, the perspectives of employees who are transferred in connection with acquisitions will be taken into account through surveys and discussions. At the end of 2025, the company established a working group consisting of employees from different functions, an internal commu-

nications expert and the SVP of People & Culture; the aim is to draw up operating methods and a schedule for the implementation of the Culture Handbook. During 2026, Qt will also update the Culture Handbook to take into account the views, practices, and values of IAR employees, and add the company's new offices in Poland and the UK.

### **Targets and metrics**

Qt monitors the percentage of employees and suppliers who have completed training on the Code of Conduct and the number of reports received via the anonymous whistleblowing channel. Qt's goal is that from 2026 onwards, 100 percent of employees and external consultants working on customer projects will have completed the training during the reporting year. In 2025, 92 percent of employees completed the training\*. The metric is internally created and internally monitored, and the measurement has not been validated by an external party. Qt intends to develop the process and monitoring of external consultant training during 2026 and will report the completion rate of ISO 27001 training for external consultants from 2026 onwards.

\*Employees who joined the training system by December 16, 2025, and are still employed on December 31, 2025, in proportion to employees employed at the end of the year. Employees without an obligation to work (e.g. due to parental leave) are not included in the figure. In 2024, all employees who had completed the training during their employment were included.

### **Supplier relations (G1-2)**

At Qt, the primary term of payment for all purchase invoices is 30 days (net). Invoices are paid on the due date without delay, provided that they have been approved by the appropriate employees, are justified, and have been sent to the company in accordance with the relevant instructions.

External consultants operating in customer projects are required to complete ISO27001 training, which includes a module on Qt's Code of Conduct. Qt has not yet established requirements for suppliers relating to sustainability topics.

### **Prevention and detection of corruption and bribery (G1-3)**

To prevent allegations or incidents of corruption and bribery, all Qt employees and external consultants working in customer projects complete a section on the prevention of corruption and bribery as part of the training on the Code of Conduct. The whistleblowing practice is applied in the detection and processing of incidents of corruption and bribery.

The themes of corruption and bribery are mandatory training in the Code of Conduct for part-time employees. In addition, the Code of Conduct is incorporated into supplier agreements concerning customer projects. All members of the Management Team and Board of Directors are required to complete the Code of Conduct training.

If the persons designated to process whistleblower reports are identified as being parties to the incident concerned by the whistleblower report, they may be disqualified from its processing as necessary. The incidents are reported to the Board of Directors as part of financial statements information. The reporting to the Board of Directors concerns the number of incidents leading to an investigation by the public authorities. Qt has not separately determined functions-at-risk with regard to corruption and bribery.

### **Confirmed incidents of corruption or bribery (G1-4)**

Qt has not been subject to any convictions or fines for violation of anti-corruption and anti-bribery laws, and has therefore not had to implement any remedies. The existing preventive processes, such as agreements and training, have been sufficient.

## Data protection

### Policies related to data protection

Data protection is an integral part of Qt's Code of Conduct. The Code of Conduct applies to all Qt Group employees, sub-contractors, vendors, and partners in all geographical regions. More information on the Code of Conduct is provided in the section G1 Business conduct.

Qt also has a separate Privacy Policy, the main purpose of which is to protect and manage the personal data of users collected in connection with the use of Qt's websites, products, and services. The Qt Group is committed to protecting the privacy of its users, those visiting the Qt Group's web pages, and people interacting with the Qt Group.

Any personal data processed by Qt Group through its web pages or related to the downloading or use of the products or services of the Qt Group is processed pursuant to applicable data protection legislation. The Privacy Policy does not apply to employee or recruitment data that is subject to a separate privacy policy (see section S1 Own Workforce).

The Privacy Policy is approved by Qt's Management Team and CEO, who are also the most senior level in the organization accountable for the implementation of the policy. The Privacy Policy is aligned with the ISO 27001 information security management standard and the ISO 9001 quality management standard, and it is publicly available on Qt's website.

### Actions and resources in relation to data protection

Qt Group's operations are ISO 27001-certified, and the priority during 2026 is to merge IAR, acquired in October 2025, into the same processes. During 2025, Qt also continued to develop its operations in response to the requirements of the European Union's Network and Information Security Directive (NIS2).

Qt Group offers a range of IT and information security training courses that support the development of employee competence, ethical operations, and information security in accordance with the ISO 27001 standard. In 2025, Qt updated the information security training to be more clearly classified. The training is provided by a partner specializing in the theme.

The cyber security awareness training package, which is mandatory for all employees, covers the basics of information security and data protection, access control, data classification, the safe use of email and passwords, the security of remote work and the online environment, and the clean desk principle. There are also online training courses for employees on artificial intelligence and for a certified data protection expert, for example. The training strengthens the employees' capacity to comply with the company's data protection and information security principles, which are an integral part of

the Qt Group's operations and ISO 27001-compliant management system.

Working hours of specialists, such as the information security expert, legal expert and the head of information management and IT operations, have been allocated to the measures. In addition, resources have been budgeted for the necessary tools, such as a system for managing information related to the ISO standard.

### **Metrics in relation to data protection**

Qt monitors and measures the share of all employees who have completed the cyber security awareness training package. The metric is internally created and internally monitored, and the measurement has not been validated by an external party.

#### **Share of employees who completed the cyber security training package in 2025 (2024):**

- 97% (two courses in 2024: 71% & 89%)

Employees who have joined the training system by December 16 and are still employed on December 31, 2025, in proportion to employees employed at the end of the year. Employees without an obligation to work (e.g. due to parental leave) are not included in the figure. The completion rate of two mandatory courses was monitored in 2024, and one comprehensive course was in use in 2025.

### **Targets related to data protection**

Qt has set a target of 100 percent for the completion rate of information security and data protection-related training by the end of 2026.

In 2025, Qt developed a learning platform and will add new data protection training courses for all employees. At the same time, the data collected by the learning platform has been improved and the monitoring of the achievement of the target has been developed.

The monitoring for 2025 only covers employees, but Qt's aim is to monitor the course completion rates of external consultants separately starting from 2026. The target has been set internally, and stakeholders have not been engaged in setting it.

## List of datapoints in cross-cutting and topical standards that derive from other EU legislation

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS 2 GOV-1</b> Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 ( <sup>27</sup> ), Annex II		Yes	3
<b>ESRS 2 GOV-1</b> Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		Yes	2
<b>ESRS 2 GOV-4</b> Statement on due diligence paragraph 30	Indicator number 10 of Table #3 of Annex 1				Yes	4
<b>ESRS 2 SBM-1</b> Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicator number 4 of Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 ( <sup>28</sup> ) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Not material	
<b>ESRS 2 SBM-1</b> Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 of Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not material	
<b>ESRS 2 SBM-1</b> Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 of Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 ( <sup>29</sup> ), Article 12( <sup>1</sup> ) Delegated Regulation (EU) 2020/1816, Annex II		Not material	
<b>ESRS 2 SBM-1</b> Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12( <sup>1</sup> ) Delegated Regulation (EU) 2020/1816, Annex II		Not material	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS E1-1</b> Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Not material	
<b>ESRS E1-1</b> Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		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		Not material	
<b>ESRS E1-4</b> GHG emission reduction targets paragraph 34	Indicator number 4 of 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		Not material	
<b>ESRS E1-5</b> Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 of Table #1 and Indicator number 5 of Table #2 of Annex 1				Not material	
<b>ESRS E1-5</b> Energy consumption and mix paragraph 37	Indicator number 5 of Table #1 of Annex 1				Not material	
<b>ESRS E1-5</b> Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 of Table #1 of Annex 1				Not material	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS E1-6</b> Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 of 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)		Not material	
<b>ESRS E1-6</b> Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 of 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)		Not material	
<b>ESRS E1-7</b> GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not material	
<b>ESRS E1-9</b> Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not material	
<b>ESRS E1-9</b> Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) <b>ESRS E1-9</b> Location of significant assets at material physical risk paragraph 66 (c).		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			Not material	
<b>ESRS E1-9</b> Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book -Climate change transition risk: Loans collateralized by immovable property - Energy efficiency of the collateral			Not material	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS E1-9</b> Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Not material	
<b>ESRS E2-4</b> 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, paragraph 28	Indicator number 8 of Table #1 of Annex 1 Indicator number 2 of Table #2 of Annex 1 Indicator number 1 of Table #2 of Annex 1 Indicator number 3 of Table #2 of Annex 1				Not material	
<b>ESRS E3-1</b> Water and marine resources paragraph 9	Indicator number 7 of Table #2 of Annex 1				Not material	
<b>ESRS E3-1</b> Dedicated policy paragraph 13	Indicator number 8 of Table 2 of Annex 1				Not material	
<b>ESRS E3-1</b> Sustainable oceans and seas paragraph 14	Indicator number 12 of Table #2 of Annex 1				Not material	
<b>ESRS E3-4</b> Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 of Table #2 of Annex 1				Not material	
<b>ESRS E3-4</b> Total water consumption in m <sup>3</sup> per net revenue on own operations paragraph 29	Indicator number 6.1 of Table #2 of Annex 1				Not material	
<b>ESRS 2 – IRO-1 – E4</b> 1 - E4 paragraph 16 (a) i	Indicator number 7 of Table #1 of Annex 1				Not material	
<b>ESRS 2 – IRO-1 – E4</b> 1 - E4 paragraph 16 (b)	Indicator number 10 of Table #2 of Annex 1				Not material	

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS 2 – IRO-1 – E4</b> 1 - E4 paragraph 16 (c)	Indicator number 14 of Table #2 of Annex 1				Not material	
<b>ESRS E4-2</b> Sustainable land/ agriculture practices or policies paragraph 24 (b)	Indicator number 11 of Table #2 of Annex 1				Not material	
<b>ESRS E4-2</b> Sustainable oceans/ seas practices or policies paragraph 24 (c)	Indicator number 12 of Table #2 of Annex 1				Not material	
<b>ESRS E4-2</b> Policies to address deforestation paragraph 24 (d)	Indicator number 15 of Table #2 of Annex 1				Not material	
<b>ESRS E5-5</b> Non-recycled waste paragraph 37 (d)	Indicator number 13 of Table #2 of Annex 1				Not material	
<b>ESRS E5-5</b> Hazardous waste and radioactive waste paragraph 39	Indicator number 9 of Table #1 of Annex 1				Not material	
<b>ESRS 2 – SBM-3 – S1</b> Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 of Table #3 of Annex I				Yes	19
<b>ESRS 2 – SBM-3 – S1</b> Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 of Table #3 of Annex I				Yes	19
<b>ESRS S1-1</b> Human rights policy commitments paragraph 20	Indicator number 9 of Table #3 and Indicator number 11 of Table #1 of Annex I				Yes	32

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS S1-1</b> Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21				Delegated Regulation (EU) 2020/1816, Annex II	Yes	20, 32
<b>ESRS S1-1</b> Processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 of Table #3 of Annex I				Yes	32
<b>ESRS S1-1</b> Workplace accident prevention policy or management system paragraph 23	Indicator number 1 of Table #3 of Annex I				Yes	20
<b>ESRS S1-3</b> Grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 of Table #3 of Annex I				Yes	22, 32-33
<b>ESRS S1-14</b> Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 of Table #3 of Annex I			Delegated Regulation (EU) 2020/1816, Annex II	Yes	27
<b>ESRS S1-14</b> Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 of Table #3 of Annex I				Yes	27
<b>ESRS S1-16</b> Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 of Table #1 of Annex I			Delegated Regulation (EU) 2020/1816, Annex II	Yes	28
<b>ESRS S1-16</b> Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 of Table #3 of Annex I				Yes	28

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS S1-17</b> Incidents of discrimination paragraph 103 (a)	Indicator number 7 of Table #3 of Annex I				Yes	28
<b>ESRS S1-17</b> Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 of Table #1 and Indicator number 14 of Table #3 of Annex I			Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	Yes	32
<b>ESRS 2 – SBM-3 – S2</b> Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and number 13 of Table #3 of Annex I				Yes	29
<b>ESRS S2-1</b> Human rights policy commitments paragraph 17	Indicator number 9 of Table #3 and Indicator number 11 of Table #1 of Annex 1				Yes	32
<b>ESRS S2-1</b> Policies related to value chain workers paragraph 18	Indicator number 11 and number 4 Table #3 of Annex 1				Yes	29, 30, 32
<b>ESRS S2-1</b> Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 of Table #1 of Annex 1			Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	Yes	29, 30, 32
<b>ESRS S2-1</b> Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19				Delegated Regulation (EU) 2020/1816, Annex II	Yes	29, 30

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS S2-4</b> Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 of Table #3 of Annex 1				Yes	31
<b>ESRS S3-1</b> Human rights policy commitments paragraph 16	Indicator number 9 of Table #3 of Annex 1 and Indicator number 11 of Table #1 of Annex 1				Not material	
<b>ESRS S3-1</b> Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 of Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	
<b>ESRS S3-4</b> Human rights issues and incidents paragraph 36	Indicator number 14 of Table #3 of Annex 1				Not material	
<b>ESRS S4-1</b> Policies related to consumers and end-users paragraph 16	Indicator number 9 of Table #3 and Indicator number 11 of Table #1 of Annex 1				Not material	
<b>ESRS S4-1</b> Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 of Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	
<b>ESRS S4-4</b> Human rights issues and incidents paragraph 35	Indicator number 14 of Table #3 of Annex 1				Not material	
<b>ESRS G1-1</b> United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 of Table #3 of Annex 1				Yes	32, 33

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material to Qt	Page number
<b>ESRS G1-1</b> Protection of whistle-blowers paragraph 10 (d)	Indicator number 6 of Table #3 of Annex 1				Yes	33
<b>ESRS G1-4</b> Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 of Table #3 of Annex 1			Delegated Regulation (EU) 2020/1816, Annex II)	Yes	34
<b>ESRS G1-4</b> Standards of anti-corruption and anti-bribery paragraph 24 (b)	Indicator number 16 of Table #3 of Annex 1				Yes	32–34

Code	Caption	Page
<b>General Disclosures</b>		
<b>General Disclosures (ESRS 2)</b>		
<b>BP-1</b>	General basis for preparation of sustainability statements	2
<b>BP-2</b>	Disclosures in relation to specific circumstances	2
<b>GOV-1</b>	The role of the administrative, management and supervisory bodies	2–3
<b>GOV-2</b>	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	3
<b>GOV-3</b>	Integration of sustainability-related performance in incentive schemes	4
<b>GOV-4</b>	Statement on due diligence	4
<b>GOV-5</b>	Risk management and internal controls over sustainability reporting	4
<b>SBM-1</b>	Strategy, business model and value chain	5
<b>SBM-2</b>	Interests and views of stakeholders	6–7
<b>SBM-3</b>	Material impacts, risks and opportunities and their interaction with strategy and business model	8, 10
<b>IRO-1</b>	Description of the processes to identify and assess material impacts, risks and opportunities	9
<b>IRO-2</b>	Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	13
<b>MDR-P</b>	Policies adopted to manage material sustainability matters	19–21, 29–30, 32–33, 35
<b>MDR-A</b>	Actions and resources in relation to material sustainability matters	23–24, 31, 33, 35
<b>MDR-M</b>	Metrics in relation to material sustainability matters	23–24, 31, 33, 36
<b>MDR-T</b>	Tracking effectiveness of policies and actions through targets	24, 31, 33, 36

Code	Caption	Page
<b>Environmental information</b>		
<b>Taxonomy information</b>		
<b>Social information</b>		
<b>Own workforce (S1)</b>		
<b>S1-1</b>	Policies related to own workforce	19–21
<b>S1-2</b>	Processes for engaging with own workers and workers' representatives about impacts	21
<b>S1-3</b>	Processes to remediate negative impacts and channels for own workers to raise concerns	22
<b>S1-4</b>	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	23–24
<b>S1-5</b>	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	25
<b>S1-6</b>	Characteristics of the undertaking's employees	26
<b>S1-9</b>	Diversity metrics	26
<b>S1-10</b>	Adequate wages	27
<b>S1-14</b>	Health and safety metrics	27
<b>S1-16</b>	Remuneration metrics (pay gap and total compensation)	28
<b>S1-17</b>	Incidents, complaints and severe human rights impacts	28

Code	Caption	Page
<b>Workers in the value chain (S2)</b>		
S2-1	Policies related to value chain workers	29–30
S2-2	Processes for engaging with value chain workers about impacts	30
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	30
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	31
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	31
<b>Governance information</b>		
<b>Business conduct (G1)</b>		
G1-1	Corporate culture and business conduct policies and corporate culture	32–33
G1-2	Management of relationships with suppliers	34
G1-3	Prevention and detection of corruption and bribery	34
G1-4	Confirmed incidents of corruption or bribery	34

# Assurance Report on the Sustainability Report

This document is an English translation of the Finnish auditor's report.  
Only the Finnish version of the report is legally binding.

## To the Annual General Meeting of Qt Group Plc

We have performed a limited assurance engagement on the group sustainability report of Qt Group Plc (business identity code 2733394-8) that is referred to in Chapter 7 of the Accounting Act and that is included in the report of the Board of Directors for the financial year 1.1.–31.12.2025.

### Opinion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the group sustainability report does not comply, in all material respects, with

- 1) the requirements laid down in Chapter 7 of the Accounting Act and the sustainability reporting standards (ESRS), and
- 2) the requirements laid down in Article 8 of the Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (EU Taxonomy).

Point 1 above also contains the process in which Qt Group Plc has identified the information for reporting in accordance with the sustainability reporting standards (double materiality assessment).

Our opinion does not cover the tagging of the group sustainability report with digital XBRL sustainability tags in accordance with Chapter 7, Section 22, Subsection 1(2), of the Accounting Act, because sustainability reporting companies have not had the possibility to comply with that

requirement in the absence of requirements for the tagging of sustainability information in the ESEF regulation or other European Union legislation.

### **Basis for Opinion**

We performed the assurance of the group sustainability report as a limited assurance engagement in compliance with good assurance practice in Finland and with the International Standard on Assurance Engagements (ISAE) 3000 (Revised) *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*.

Our responsibilities under this standard are further described in the *Responsibilities of the Authorized Group Sustainability Auditor* section of our report.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### **Authorized Group Sustainability Auditor's Independence and Quality Management**

We are independent of the parent company and of the group companies in accordance with the ethical requirements that are applicable in Finland and are relevant to our engagement, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

The authorized group sustainability auditor applies International Standard on Quality Management ISQM 1, which requires the authorized sustainability audit firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### **Responsibilities of the Board of Directors and the Managing Director**

The Board of Directors and the Managing Director of Qt Group Plc are responsible for:

- the group sustainability report and for its preparation and presentation in accordance with the provisions of Chapter 7 of the Accounting Act, including the process that has been defined in the sustainability reporting standards and in which the information for reporting in accordance with the sustainability reporting standards has been identified,
- the compliance of the group sustainability report with the requirements laid down in Article 8 of the Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088, and for
- such internal control as the Board of Directors and the Managing Director determine is necessary to enable the preparation of a group sustainability report that is free from material misstatement, whether due to fraud or error.

### **Inherent Limitations in the Preparation of a Sustainability Report**

Preparing a group sustainability report requires a company to make materiality assessment to identify relevant matters to report. This includes significant management judgement and choices. It is also characteristic to the sustainability reporting that reporting of this kind of information includes estimates and assumptions as well as measurement and estimation uncertainty.

When reporting forward-looking information in accordance with ESRS standards, a company's management is required to make assumptions about possible future events, and to disclose the company's possible future actions in relation to those events, as well as to prepare the forward-looking information based on these assumptions. Actual results are likely to differ because forecasted events often do not occur as expected.

### **Responsibilities of the Authorized Group Sustainability Auditor**

Our responsibility is to perform an assurance engagement to obtain limited assurance about whether the group sustainability report is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our opinion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence

## ASSURANCE REPORT ON THE SUSTAINABILITY REPORT

the decisions of users taken on the basis of the group sustainability report.

Compliance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised) requires that we exercise professional judgment and maintain professional skepticism throughout the engagement. We also:

- Identify and assess the risks of material misstatement of the group sustainability report, whether due to fraud or error, and obtain an understanding of internal control relevant to the engagement in order to design assurance procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the parent company's or the group's internal control.
- Design and perform assurance procedures responsive to those risks to obtain evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

### Description of the Procedures That Have Been Performed

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. The nature, timing and extent of assurance procedures selected depend

on professional judgment, including the assessment of risks of material misstatement, whether due to fraud or error. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our procedures included, among others, the following:

- We interviewed the company's management and persons responsible for collecting and preparing the information contained in the group sustainability report
- Regarding the double materiality assessment process, we assessed the implementation of the process carried out by the company and the information disclosed on the process in relation to the requirements of the ESRS standards.
- Through interviews we gained understanding of the key processes related to collecting and consolidating the sustainability information.
- We got acquainted with the internal guidelines and operating principles relevant to the sustainability information disclosed in the group sustainability report, as applicable.
- We got acquainted with the background documentation and documents prepared by the company, as applicable, and assessed whether they support the information included in the group sustainability report.
- In relation to the EU taxonomy information, we gained understanding about the process by which the company has defined taxonomy eligible and taxonomy aligned

activities and assessed the regulatory compliance of the information provided.

- We assessed the information disclosed on material sustainability matters in the group sustainability report in relation to the requirements of the ESRS standards.

Helsinki, March 19, 2026  
KPMG OY AB  
Authorized Sustainability Audit Firm

JONNE AHOKAS  
Authorized Sustainability Auditor, KRT

