



Annual report 2024



Towards the world's safest, smoothest, and most environmentally friendly traffic

We provide and develop traffic control and management services for all modes of transport. We help people and goods to arrive safely, smoothly and with respect for the environment. Intelligent traffic control services, digital services for businesses and consumers, and up-to-date traffic data will help Finland become a pioneer in sustainable transport and logistics.

We want to offer an excellent and attractive workplace for top experts. At the end of the year, we employed 1,196 professionals.

How to read the report package



Annual Report 2024

Strategy, key events of 2024, and a review of responsibility and sustainability.



Governance and Remuneration Report 2024

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

[Read the report here.](#)



Report by the Board of Directors and Financial Statements 2024

A description of the company's operations in 2024 and a summary of its financial results and financial position.

[Read the report here.](#)

Parent company

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

Subsidiaries

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

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

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

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

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Year 2024



Your partner in traffic

When a flight captain is authorised to land, a train passenger knows that his train will arrive on track three or a freighter moves safely along its route, we are there. Our mission is to ensure safe and smooth movement on land, at sea and in the air.

To carry out this task, we utilise up-to-date data. We know what is happening in traffic every second of the day. We ensure that all actors in the sector can make efficient use of this real-time information.

Our goal is even more ambitious: we want to be able to know in advance what will happen in traffic and what will follow from that. By acting smartly, we can prevent accidents, speed up travel times and facilitate the transit from one vehicle to another. At the same time, we optimise emissions reductions in transport and save tax revenues.

Imagine a world in which unmanned aerial vehicles and aircraft take off and land safely, more train services arrive on track three than you could even hope, and near-miss situations of cargo ships are stories of the past. A world in which all means of

transport move smartly, safely and in an optimised manner to form seamless mobility and logistics chains.

This image of the future is possible when an increasingly comprehensive digital layer is added on top of the physical infrastructure. A layer that provides a real-time situational picture of the entire transport system and services. Within the layer, individual actors can easily share information and thus build services that are fully compatible with each other.

This would allow us to create in Finland a kind of network of transport operators skilfully utilising data the world has never seen before.

This is an opportunity to create something unique and give our country an exceptional advantage. Let us make Finland a model country in intelligent transport and logistics. Let us create work and services. Let us improve our competitiveness.

We Finns need the expertise of Fintraffic employees, every second of the day, all year round.





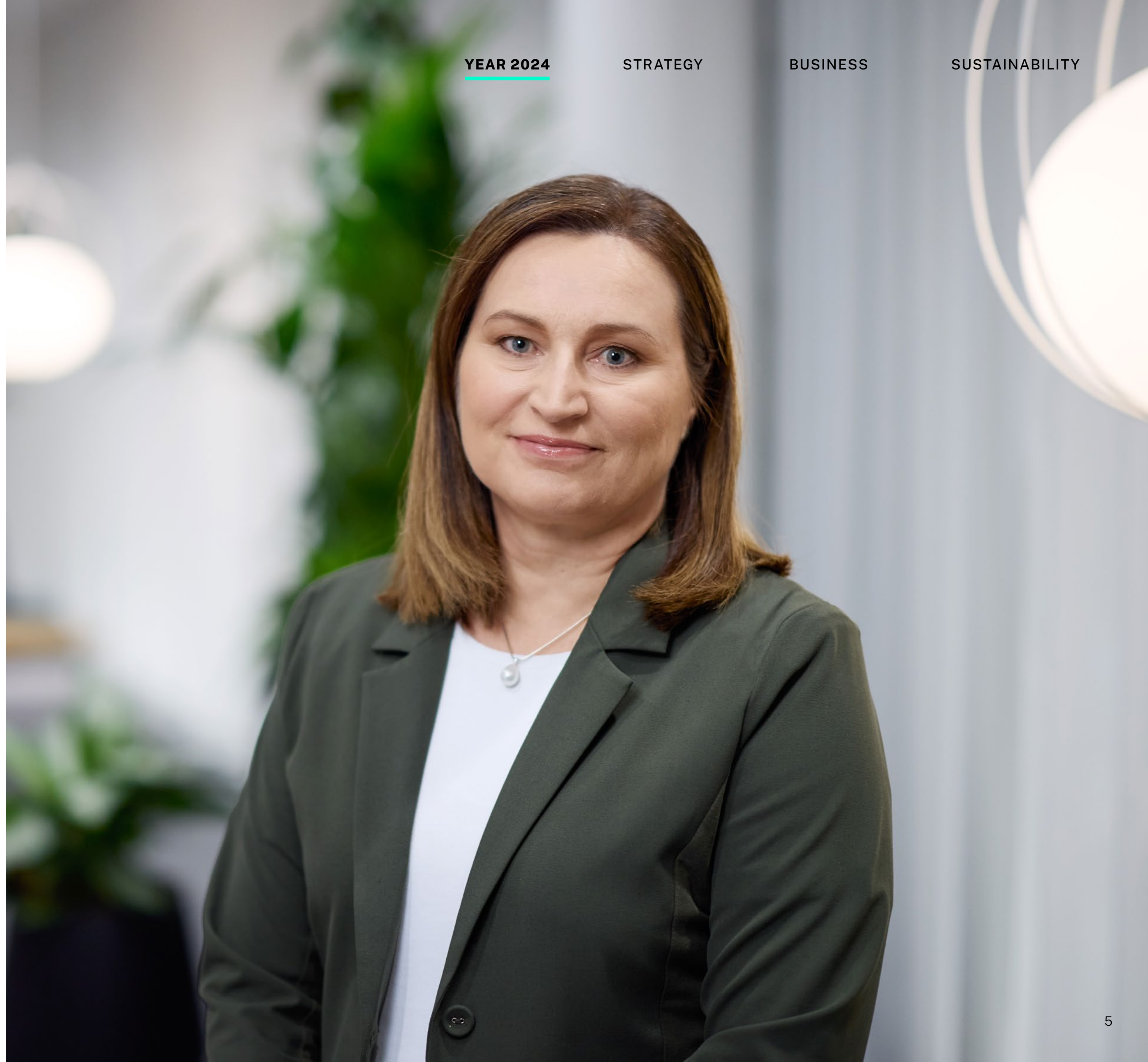
CEO'S REVIEW

The use of digital services kept increasing

Year 2024, was full of great successes and achievements. They would not have been possible without our committed personnel, partners and customers. Thank you all!

T

he year 2024 was characterised by unstable geopolitical situation. Our operating environment was challenged by various extreme weather phenomena and disruptions. Thanks to our skilled professionals, under the demanding conditions, we were able to meet the expectations of





society and provide first-rate traffic control and management services. Safety level also remained good throughout the year across all modes of transport.

Finnish people are also better aware of Fintraffic and its services than before. The popularity of our digital services continued to grow, and records were broken in data sharing – the number of visits to digital services almost tripled compared to 2023. The Customer Experience Award 2024 we won for the Fintraffic App proves how useful the application is.

Promoting sustainable development is at the core of our business. We make determined efforts to improve the safety level of the entire transport system and to reduce emissions. We can influence matters by means such as optimising routes and speeds, preventing congestion and promoting the flow of information between actors, and preventing and clearing disruptions.

By making our service production more efficient, we can achieve more with every euro spent. Effective use of our customers' funds is important to us, and that, if anything, also tells of sustainable operations.

We took major steps in our sustainability work by preparing for the implementation of the CSRD framework, by training ourselves and by integrating sustainability more closely into the development of our business operations. The cornerstones of

sustainability at Fintraffic were defined in the double materiality analysis and sustainability programme approved during the year. At the same time, they prepare us for the legislative sustainability requirements that will apply to us from the beginning of 2025.

Company strategy was implemented through three programmes

Productised digital ecosystem services

Fintraffic is Finland's most important and most popular compiler and provider of traffic data. Our work aimed at building a digital twin of the transport system has begun.

Examples of how well we have succeeded include the more than 50,000 downloads of the Fintraffic App; the ever-increasing number of interface queries to the Digitraffic service that provides open data; the amazing 226 member organisations of the transport data ecosystem; and the launch of the Traffic Data Service Cluster.

Traffic control development

In **railway traffic management**, the Digirail project progressed towards the implementation phase as its funding was secured. This is a major step for future traffic system.

The implementation of the first commercial line section of the Digirail project progressed as expected during the year. The development of remote control systems was also promoted as planned.

In **air navigation services**, the procurement and commissioning of the remote tower system progressed to negotiations related to the tendering process.

A project aimed at updating the Finnish airspace was launched. In addition to aviation safety and responsibility perspectives, its key objectives include taking account of the changing needs of national defence.

In **road traffic management**, investments were made in improving operational reliability and system upgrades in accordance with lifecycle management plans. New solutions were implemented, among other things, in various tunnel projects, the telecommunications network, road weather stations and roadside traffic control devices and systems.

We also engaged in continuous international development work to build an enhanced situational picture and to ensure reliability.

Vessel traffic services actively collaborated with maritime bodies on development and collaboration projects related the control of sea areas, the use and monitoring of marine data, and the development of maritime cluster expertise.

Vessel traffic control played a key role in ensuring the safety of shipping traffic in the Baltic Sea in cooperation with the authorities.



In 2024, we also promoted the construction of the national Maritime Traffic Notification Service NEMO and developed POLO Port Activity. The use of the latter expanded to Germany during the year. In 2024, we potentially prevented 14 vessels from running aground. Vessel traffic control played a key role in ensuring the safety of shipping traffic in the Baltic Sea in cooperation with the authorities.

Uniform operating practices

The strategic understanding of our personnel became stronger. Building more uniform operating practices in our organisation progressed and began to produce visible benefits.

Employees feel that our values are realised in our daily activities even better than before, and personnel satisfaction increased. Fintraffic was awarded the Hyvän mielen työpaikka (Mental Health Friendly Workplace) certificate.

Outlook for the future

The profitability of road, rail and vessel traffic management is expected to remain stable. We see opportunities to improve the efficiency of our service provision. Through these measures we aim to achieve the EUR 30 million efficiency target set for 2023–2028. An EU-level performance development plan sets targets for air navigation service provision.

Fintraffic will continue to invest in the modernisation and automation of service production systems. Major near-future projects will include technology upgrade work on road tunnels and open-road sections, as well as an upgrade to traffic and train control in the Finnish railway network through Digirail and automation projects. In air navigation, the preparation of the remote air traffic control project is progressing. The deployment of the digital air navigation system and situational picture application will soon be in the deployment phase.

We will also continue our information and cybersecurity development programme, and we will invest in preparedness in all modes of transport.

For us, 2024 was not only filled with work, but also full of great successes and achievements. They would not have been possible without our committed personnel, partners and customers. Thank you all – let us continue together towards the safest, smoothest and most environmentally friendly traffic in the world also in 2025!

Pia Julin

CEO



Key figures 2024

Turnover EUR (242.2) million

EUR **253.6** million

Operating profit EUR (6.3) million

EUR **16.1** million

Average number of personnel (1,180)

1,198

Supervisory work index (4.2)

4.3

Number of serious accidents resulting from
Fintraffic's operations (0)

0

Prevented possible groundings of maritime vessels (13)

14

Value creation in the transport data economy EUR (40) million

EUR **54** million

Interface calls made to Digitraffic (4.7)

6.1

Emissions saved in road and air traffic (33,000) tCO₂e

28,700 tCO₂e



Business areas in brief

Air Navigation Services

Revenue MEUR 88.7 (74.2)
Personnel 425 (420)

Our services

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

Vessel Traffic Services

Revenue MEUR 20.8 (20.0)
Personnel 106 (100)

Our services

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

Railway Traffic Management

Revenue MEUR 86.5 (90.1)
Personnel 495 (477)

Our services

- railway traffic management
- traffic planning to coordinate trackwork and rail traffic
- capacity management
- control centre operations
- passenger information services for train travel
- responsibility for the safety control room and quality control room
- expert and training services

Road Traffic Management

Revenue MEUR 54.5 (54.9)
Personnel 96 (91)

Our services

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

Traffic Data Ecosystem

Revenue MEUR 3.4
Personnel 7

Our services

- promoting cooperation with traffic sector operators: enabling and coordinating traffic data ecosystem activities
- developing digital traffic infrastructure: a technical data platform, data and basic digital business services
- compiling a digital rulebook: templates, standard contracts, cooperation and data transfer standards
- continuous development of our existing services: e.g. Fintraffic App, Digitraffic, Traffic Situation, Feedback Channel, Digitransit, FINAP



2024 achievements

RELIABILITY

The reliability of our traffic control services remained good despite what was happening in our operating environment. We continuously improved the safety, smoothness and environmental friendliness of traffic with our services and supported the work of the authorities.

EFFICIENCY

The efficiency of our service production continued to improve. We are well on track towards achieving our efficiency target.

DIGITAL SERVICES

The popularity of our digital services almost tripled from the previous year, and records were broken in sharing of traffic data. Fintraffic App won the Customer Experience Award 2024. The growth of the data ecosystem continued, and the Traffic Data Service Cluster was launched.

TRAFFIC CONTROL DEVELOPMENT PROJECTS

- Funding for the implementation phase of the Digirail project was secured
- Progress was made in the procurement and commissioning of Multi Remote Operating Tower (MROT)
- On the Finnish coast, new vessel traffic meeting and overtaking prohibition areas were introduced.
- The development of collaborative intelligent transport systems continued in road traffic. For the first time in Finland, we were able to pilot the exchange of information between traffic lights and vehicles using EU standards. Fintraffic was able to distribute its traffic bulletins directly to the navigation systems of different car manufacturers.

SUCCESS

The National Audit Office of Finland examined Fintraffic's operations and found that we had succeeded in our task.

SUSTAINABILITY

Our sustainability work progressed and Fintraffic's first sustainability programme was completed.

EMPLOYEE SATISFACTION

Personnel satisfaction continued to improve. Fintraffic was awarded the Hyvän mielen työpaikka® (Mental Health Friendly Workplace) certificate in recognition of its commitment to promoting mental health.

AWARD

The ITS World Congress, a major event for intelligent transportation systems, presented an award to Fintraffic's Road Traffic Management for the best technical publication of 2024.

WORKING CONDITIONS

The Helsinki Metropolitan Area premises project was completed, and the first functions moved to the new premises in November.

CUSTOMER SERVICE

The experiences from the voice robotics trial of the Road User Line (customer service) were positive. Therefore, the system is now advancing towards production readiness.





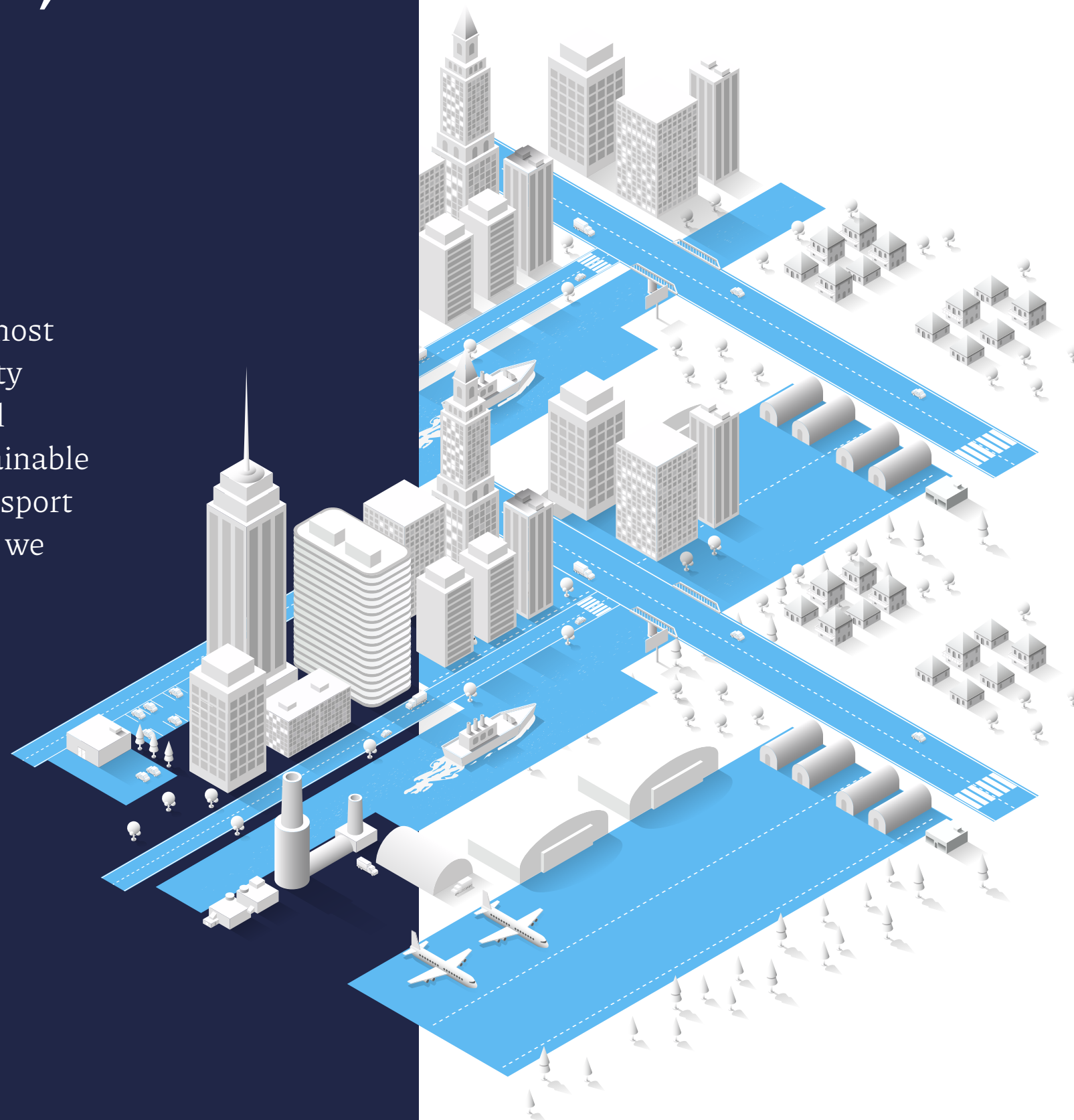
Strategy



STRATEGY 2024–2028

Towards the world's safest, smoothest and most environmentally friendly traffic

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



Our strategy is based on Fintraffic's ownership strategy, which was approved on 16 October 2019.

It defines Fintraffic's duties as follows:

1

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

2

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

3

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



In 2024, we implemented our strategy through three programmes:



Productised digital ecosystem services

We develop and offer productised digital services for application developers, companies and end users. We promote cooperation in the sector in the traffic data ecosystem. Thanks to cooperation and high-quality platform services, we are building a digital traffic twin piece by piece and better functioning travel and transport chains.



Traffic control development

Our goal is to offer the safest, most reliable and most efficient traffic management services in the world. This means developing the situational picture of traffic and preparedness further, increasing the degree of automation and creating digitalisation and new service solutions for traffic. Data, analytics and the utilisation of artificial intelligence are at the centre of the development efforts.



Uniform operating practices

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

What progress did we make in implementing our strategy in 2024?

1. There are 226 companies involved in the data ecosystem work promoting traffic digitalisation.
2. Fintraffic progressed as planned in developing its digital services for companies, authorities, application developers and consumers, and the use of the services reached a new record. There were eight million visits to our services in 2024, compared to three million in the previous year. The number of downloads of the Fintraffic App increased, and the application received the Customer Experience Award 2024.
3. The volume of data we shared was 30% per cent higher than in the previous year. In 2024, 23.43 billion interface calls were made.

4. Traffic management services operated reliably and to a high standard in all modes of transport throughout the year.
5. Progress was made in the development of traffic management systems. The development programme of information and cybersecurity continued, and we achieved compliance with the reformed information security requirements. Investments in preparedness continued.
6. The efficiency of service production continued to improve. We aim to enhance the efficiency of the provision of services to the Finnish Transport Infrastructure Agency by EUR 30 million between 2023 and 2027. We have already achieved a cumulative improvement of EUR 30 million in the same services between 2019 and 2022.

7. The creation of a more unified operating model progressed and started to generate clearer benefits, such as:
 - The willingness of employees to recommend Fintraffic and their perception of supervisory work continued to improve.
 - Employees feel that our values are realised in our daily activities even better than before. The entire organisation's understanding of the common strategy has continued to improve.
 - The awareness of our joint Fintraffic brand among the general public continued to increase.



**Added value
generated by
Fintraffic for the
data economy EUR
54
million.**

Operating environment

Well-functioning transport and logistics connections are Finland's lifeblood. This applies to both international connections and mobility and transport within the country.

The world's logistics system has been disrupted by both the coronavirus pandemic and Russia's war of aggression. This has been reflected in longer delivery times for components, raw materials and daily consumer goods, disruptions in deliveries and higher

prices. Travel and transport costs for both households and companies have increased.

The war has also turned Finland into the cul-de-sac of Europe, as our position as a hub between Asia and Europe has weakened and we now have fewer international connections than we used to. Finnish products now have a longer journey to export markets, which increases their carbon footprint and weakens price competitiveness. Markets and customers are placing more and more emphasis on the carbon footprint of products, of which logistics forms a part.

In the future, the ability to utilise data and automation will play a key role in the efficiency and service level of the transport system. The ever-decreasing cost of technology, faster data connections, the development of artificial intelligence, and the convergence of transport, energy and communications networks offer new opportunities for improving traffic safety, efficiency and services. When data is utilised efficiently and in real time, different modes of transport can be combined into functional travel chains. Goods can also move more easily, as waiting times are reduced and fill rates improved.

Competitive and low-emission logistics are important for the competitiveness of Finnish companies. This offers unique business opportunities for companies providing traffic digitalisation services in both domestic and export markets.

Conclusions on the operating environment

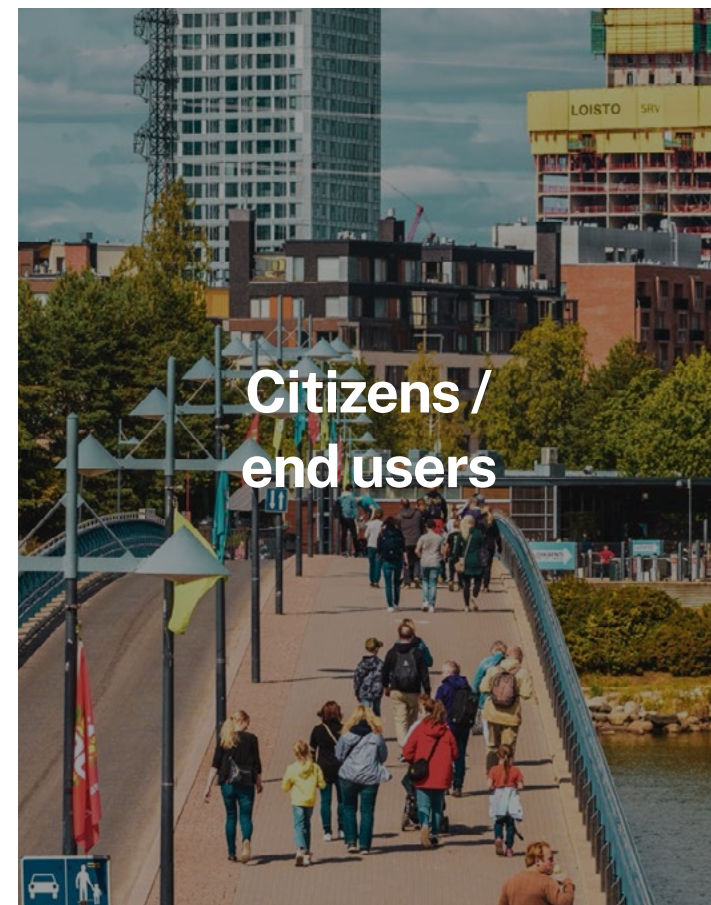
- The growing tensions in world politics will require better preparedness and improved security of supply. The increasing frequency of extreme weather phenomena, combined with a backlog of infrastructure repairs, will put increased pressure on traffic control operations and recovery from exceptional situations.
- Demand for services enhancing sustainability and traffic services, the functioning of the transport system and the efficiency of logistics chains is increasing.
- The popularity of passenger cars is not going anywhere, and this will generate demand for road traffic services, while there is limited room for growth in traffic services market otherwise. An increase in the market share of public transport through well-functioning travel chain services will require the elimination of many obstacles.
- The integration of municipal traffic information into the national view is essential for the development of the situational picture of traffic.
- The Government's budget cuts, combined with fluctuations in demand for air traffic services, is putting increased pressure on Fintraffic to streamline its operations further.
- The traffic services market is growing, especially internationally, and Fintraffic can support the exports of Finnish companies.
- Competition for desired workforce will increase in the future, which means that attracting new employees and retaining current employees is increasingly important.
- The importance of working capacity management will increase.
- Making use of the opportunities offered by technology (e.g. artificial intelligence) will require an ability to renew and reform. The importance of competence development and the ability to renew oneself will increase.
- One must also be able to utilise the increasing regulation and reporting obligations in the pursuit of business benefits.

Fintraffic's customers



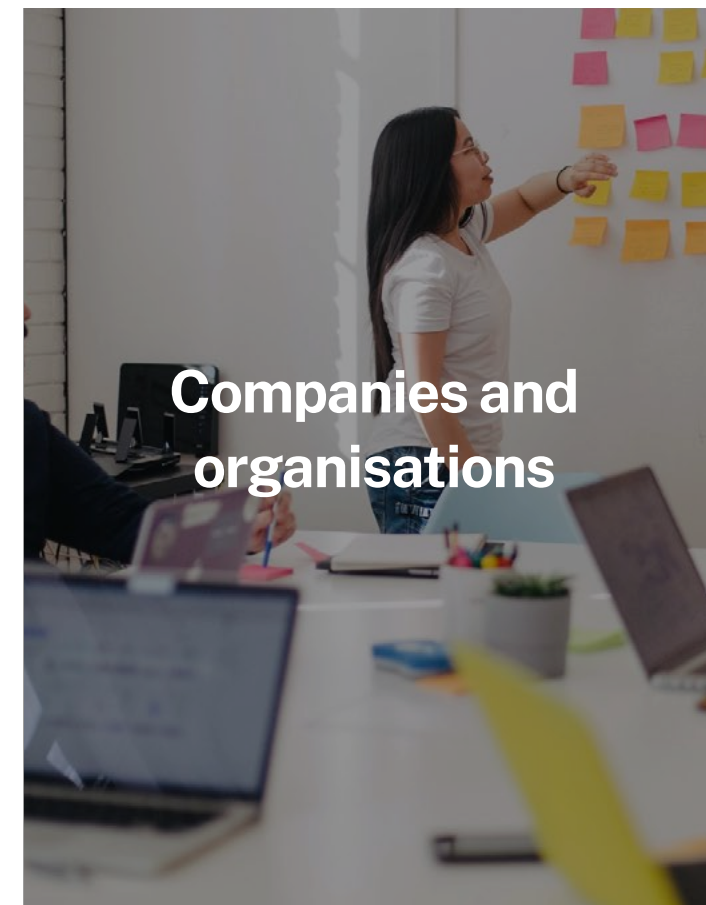
Authorities
–defence, security,
and other public actors

The traffic control and digital services produced for the authorities support Finland's competitiveness and security of supply. A real-time situational picture and other support help authorities in the performance of their own tasks.



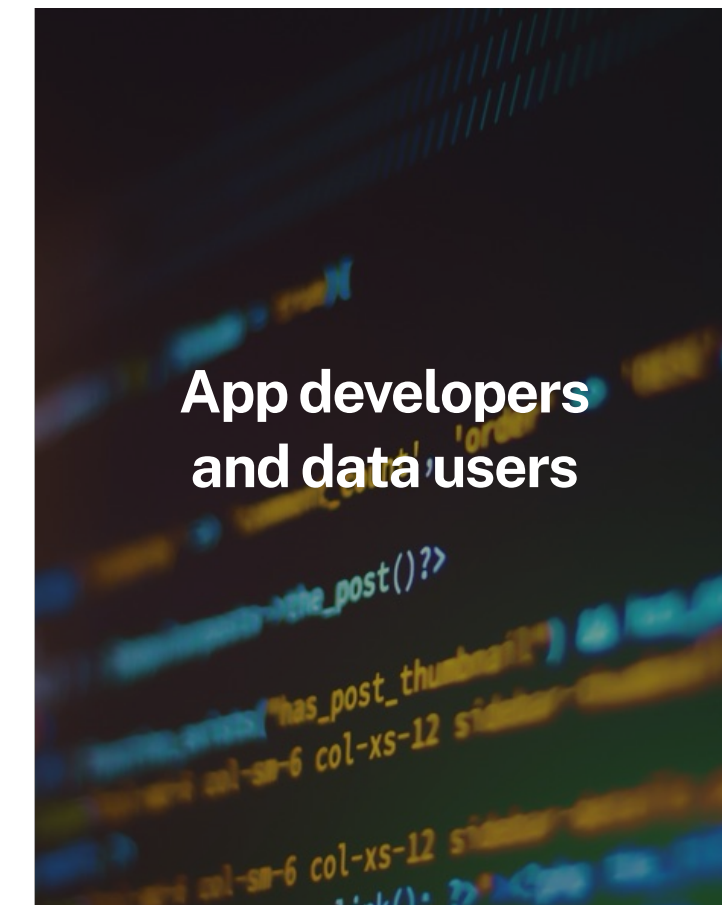
**Citizens /
end users**

Better functioning travel chains, easier travel planning, the increased share of sustainable modes of transport, reduced costs, safe and smooth road transport, improved customer satisfaction.



**Companies and
organisations**

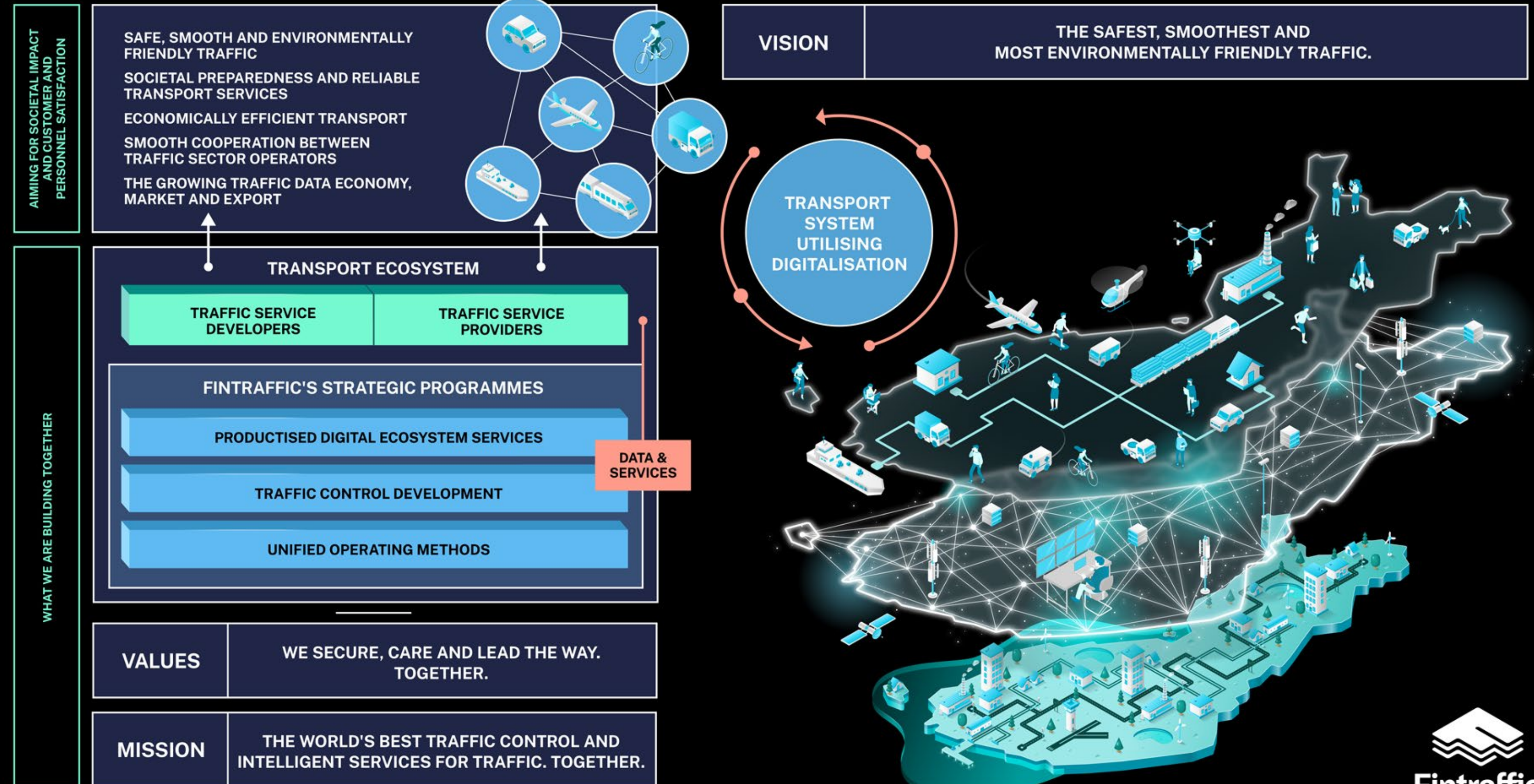
Efficient logistics, service development and new business are important for companies. These are supported by high-quality traffic control services, open data and digital services as well as ecosystem cooperation.



**App developers
and data users**

Reliable and appropriate platform services and interfaces as well as good-quality data extensively from different areas of the traffic system.

FINTRAFFIC STRATEGY 2024–2028

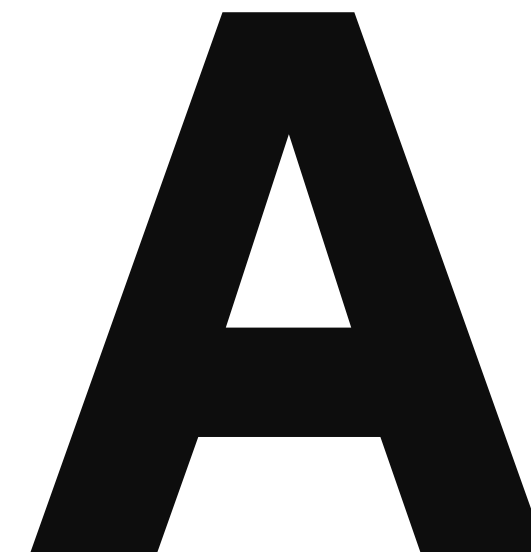




SUSTAINABILITY

Sustainability is part of Fintraffic's business and daily life

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



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

We support Finland's goal of being carbon neutral by 2035 and the Paris Agreement's objective to limit climate change to 1.5 degrees. We comply with the EU's sustainability regulation and the guidelines set for state-owned companies by the owner. The UN Global Compact principles guide our operations. We apply the Finnish Corporate Governance Code of the Securities Markets Association and the OECD Principles of Corporate Governance. We respect the key human rights declarations, such as the Universal Declaration of Human Rights and the International

Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

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

Operating in the transport sector makes ensuring safety vital for Fintraffic: our core task is to promote overall traffic safety. The unstable geopolitical situation has increased the need for development measures related to information and cybersecurity risks. While denial-of-service attacks have been targeted against Fintraffic, the impacts have been very limited thanks to information security development.

Sustainability is integrated into Fintraffic's strategy and business operations

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

At the end of 2023, we completed our first materiality analysis process of identifying and assessing material sustainability impacts, risks and opportunities in accordance with the double materiality



criteria as required by the EU's Corporate Sustainability Reporting Directive (CSRD).

The double materiality analysis continued in the early months of 2024. After having been validated by the sustainability group, the Group Management Team and the Audit Committee, the Board of Directors approved the final results of the double materiality analysis in August 2024.

The materiality analysis process is described in more detail in the Sustainability Report on page 46.

Sustainability programme

Our sustainability work is divided into the responsibility for the environment (E), responsibility for people and communities (S) and responsibility for good governance (G). Fintraffic's sustainability programme defines the objectives, measures and indicators of the key areas of sustainability. The programme also describes the key roles in the management of sustainability and stakeholders as well as the expectations of the key stakeholders and management methods.

Sustainability objectives and measures

Environmental responsibility (E)

Fintraffic's operating culture is strongly based on the principles of sustainable development. This means that our actions and decisions are in line with the Sustainable Development Goals. Through these

Fintraffic's sustainability programme



Responsibility for the environment

Carbon neutrality in our own operations and procurement

Responsibility for people and communities

A healthy, equal and competent community

A safe workplace

Promoting safe, smooth and environmentally friendly traffic

Reliable and efficient services

Seamless cooperation between traffic sector actors, a growing data economy and developing services

Responsibility for good governance

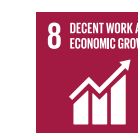
Cost-efficient management of finances

Ethical business practices: fight against corruption and bribery

Up-to-date information protection and cyber security

A well-functioning management system

Responsible use of artificial intelligence



Sustainable Development Goals central to our operations and stakeholders



principles, we aim to mitigate climate change and adapt to its impacts.

We shoulder responsibility for the environment by improving the sustainability of the transport system through traffic management services and by providing traffic data and digital services to our customers and partners. We have divided our concrete environmental action into two parts: managing the environmental impact of our own business and value chain and influencing emissions throughout the entire transport system.

Our goal is to reduce the greenhouse gas emissions from our own operations to zero by 2030 and to achieve full carbon neutrality in major procurements by 2035 in accordance with the carbon neutrality target of the Finnish government. Our environmental responsibility also includes energy and material efficiency, and environmentally safe and efficient traffic.

Social responsibility (S)

Our goal is to improve the well-being and occupational safety of personnel. This includes various measures to improve the workers' health and reduce their workload.

For example, we organise training and carry out pilot studies to mitigate the disadvantages of shift work. We invest in equality and non-discrimination by increasing the competence of supervisors in DEI



matters (Diversity, Equity, Inclusion) through training. In 2025, Fintraffic will join the Family Federation of Finland's Family-friendly Workplace programme, which promotes equality.

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

In 2024, Fintraffic was awarded the Hyvän Mielen Työpaikka® (mental-health friendly workplace) certificate in recognition of its commitment to promoting mental health.

We aim to promote safe, smooth and environmentally friendly traffic by developing traffic control and digital ecosystem services. By taking care of societal preparedness and reliable transport services, we can respond to the needs of society efficiently and reliably.

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

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

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

In 2024, we maintained a good level of safety in traffic management in all modes of transport and there were no serious accidents or accident precursors caused by Fintraffic. In addition to traffic safety, other key themes of our safety work include health security, information security and cybersecurity.

Responsibility for good governance(G)

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

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

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

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

We strongly emphasise good governance and do not accept corruption or bribery. This is of paramount importance to us, and we are proud to say that we follow strict ethical business practices. Data protection and cyber security are of emphasised importance at Fintraffic. We continuously develop our information systems and ensure that they are secure and that personal data is processed confidentially and securely. Compliance with the guidelines and policies of our management system is key to our work and helps ensure that all actions and decisions are taken in a transparent and consistent manner.

We understand the opportunities and risks of artificial intelligence and strive to use it responsibly and ethically.

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

**Fintraffic's tax
footprint EUR
46.8
million.**



IMPACT

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

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



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

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

Traffic management services, digital services for companies and consumers and up-to-date traffic information accelerate Finland's development into a pioneer in sustainable transport and logistics. There is enormous potential for improving the efficiency of the traffic system: in 2022, the logistics costs of Finnish companies averaged 13.8 per cent of the

turnover (Logistics Report 2023, University of Turku). In 2022, Finnish households spent 13.5 per cent of their disposable income on travel (Statistics Finland 2023).

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

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

How we make an impact

This is how we generate benefits for Finland:

- Accelerating the development of new travel and logistics services with the aid of digitalisation and a common set of rules and practices for the sector.
- Maintaining and sharing a real-time situational picture of traffic, open data.
- Optimising routes and speeds to combat congestion and reduce emissions through traffic management services.
- Improving the flow of information between operators to prevent and resolve disruptions.
- Increased efficiency through automation.



	Proportion of continuous descent approaches (main airport)	Air route efficiency	Unit price for air route services
Finland	63%	96.6%*	€ 57
Sweden	49%	98.3%	€ 76
Norway	59%	98.6%	€ 46
Denmark	49%	98.7%	€ 67

Source: Eurocontrol
* Air route efficiency is being affected by sanctions on Russian airlines and the use of international waters. Without Kaliningrad traffic, figure would be 98.44%

- Making investments in traffic routes and using data to optimise their use and maintenance.
- Increasing the attractiveness of public transport, for example, by reducing the impacts of disruptions and building more uniform datasets for the use of public transport operators.
- Sharing data and providing traffic management services to support effective action by the authorities.

Read more about the means of traffic management to generate benefits for the transport system and society in the sections on each business area on pp. 25–43.

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

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

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

logistics chains that combine different modes of transport.

Based on EU Commission reports, the data economy already generates value counted in hundreds of millions of euros in the transport sector in Finland. According to a study conducted by Fintraffic and the consulting firm FLOU in 2024, Fintraffic’s share of the transport data economy has grown from 4% to 6% between 2022 and 2023. This is due to increased data sharing and new end-user services, such as Fintraffic App.

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

Fintraffic’s data sharing volumes increased by 30% in the first half of 2024 compared to the first half of 2023. The number of ecosystem members increased to 226 during the same period.

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

The digitalisation of traffic creates new opportunities

By making information openly available and combining real-time data, it is possible to optimise the mobility of people and goods to a new level. The port app developed by Fintraffic is a good example of a digital service that contributes to better functioning traffic. Via the application, data is sent to a variety of operators, who can then use it to optimise, for example, the speeds of their ships and trucks. And all this accumulated efficiency has a major impact.

Data can be collected and processed through crowdsourcing not only from Fintraffic’s own sources and its partner network but also the other way around, by harnessing the data produced by transport users and increasingly intelligent vehicles.

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



HOW WE CREATE VALUE FOR SOCIETY

Towards the world's safest, smoothest and most environmentally friendly traffic

THIS IS WHAT WE DO:

Value creating traffic ecosystem



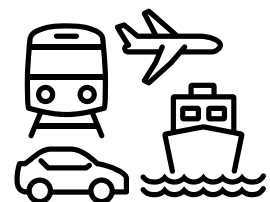
- Streamlining transport and logistics chains
- Exchanging, harnessing, and enriching real time traffic data
- Speeding up the traffic industry service development
- Driving cooperation of traffic industry operators and consolidation of operations

Productised digital ecosystem services and open data



- Situational picture of traffic and the sharing of it
- Services for companies and end-users
- Open sharing of data in API's

Traffic control on land, at sea and in the air



- Ensuring safety and flow of traffic
- Optimising routes, stages and speeds, countering congestion
- Strengthening the traffic system with automation

BENEFITS CREATED TOGETHER WITH OUR PARTNERS:

Safe traffic

Efficient transport

Climate change mitigating traffic

Cooperation in data ecosystem



Direct impact of Fintraffic's services 2024

Safe traffic

Rail passenger safety was ranked **1/29** in the EU.

No accidents or serious incidents resulting from air navigation.

No accidents resulting from traffic control

Vessel traffic services proactively intervened about **12,000 times** to ensure safe and smooth vessel traffic

26 incidents prevented in vessel traffic, of which **14** were vessels prevented from running aground

Road traffic management services led to a reduction in accidents resulting in personal injury, about **150** per year***

Efficient transport

Efficient air navigation services for Finnish air traffic –low service charges saved **EUR 112,000** vs the EU average*

The lack of delays in Finnish airspace saved **502,000 flight minutes** (= EUR 50 million) vs. the EU average*

The punctuality of Finnish rail traffic: **78%** (Sweden 70%)

Stakeholder satisfaction with traffic management services as a whole: **3.71**

Travel time saved: **500,000 vehicle hours** per year***

Real-time ETAs for ships (port call schedules) streamline port operations: data quality improved by **5%** (4.45 / 5)

Services generated economic benefits for society worth **EUR 75 million** per year***

Climate change mitigating traffic

The lack of delays in Finnish airspace **reduced CO₂ emissions by 58,500 tonnes** vs the EU average*

The optimisation of Finnish air routes has **reduced CO₂ emissions by 2,600 tonnes** vs. the EU average*

Continuous descent approaches **reduced CO₂ emissions by 15,700 tons** vs. the EU average*

Rail traffic reduced **calculated emissions by 640,000 tons**** of CO₂, which is equivalent to the annual emissions from more than 326,000 passenger cars

A reduction in CO₂ emissions from road traffic: **13,000 tons** per year***

Cooperation in data ecosystem

Operators committed to the data ecosystem: **226 operators**

The value created by Fintraffic for the transportation data economy is approximately **EUR 54 million** (2022: EUR 40 million)

Overall perceived benefit of the ecosystem (scale 1–5, Survey 12/2024)

- score for the ecosystem's activities in general (**4.15**)
- benefits for ecosystem operators' own business (**2.9**)

30% growth in the volume of data shared in Fintraffic's ecosystem

Number of interface calls to the Digitraffic open data service: **6.1 billion**

Number of companies offering travel chain brokerage and combination services: **60** (vs. 50 in 2019, Traficom: Transport Market Review)

* Calculations are based on Eurocontrol values

** Assumes that rail traffic replaces road traffic in passenger traffic

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



How we make an impact in air traffic

Air traffic enables both Finland as a whole and its various regions to remain easily accessible. The high standard of Fintraffic's air navigation services guarantees a safe and cost-effective airspace, direct air routes, and landings using continuous descent approach at Helsinki-Vantaa Airport. This substantially reduces both climate emissions and noise pollution, and lowers the cost of flying. The safe and smooth services provided without delay contribute to efficient operations of airspace users. The aim is to make Finnish airspace the most efficient and environmentally friendly in Europe by optimising flight routes, utilising larger volumes of data and increasing automation. According to the 2024 customer satisfaction survey, the services have remained functional and safe, and the overall rating for cooperation with various aviation stakeholders has risen slightly.

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

How we make an impact in vessel traffic

Fintraffic's vessel traffic services and safety radio operations ensure safe and smooth vessel traffic in Finland. This promotes Finland's foreign trade, safe shipping and the protection of marine environments.

POLO Port Activity application is already being used at more than 30 ports and is a daily tool for hundreds of people. The application is already in use in more than 20 ports in Finland and Sweden and in about a couple of hundred different organisations. It will also be introduced in Germany during 2025. The port application improves the efficiency of winter navigation by providing icebreakers with better information about ports and vessels, which reduces costs and emissions. In addition, the application supports the digitalisation and communication of ports through an open ecosystem and interfaces. This strengthens cooperation within the port community and between ports.

Fintraffic's strong Baltic Sea expertise ensures smooth navigation in the shallow and rocky sea and safe sea traffic during the winter season. 24/7 surveillance and professional VTS operators prevent accidents and any environmental damage this could cause in the Baltic Sea and Lake Saimaa.

How we make an impact in railway traffic

Fintraffic's railway traffic services improve the smoothness, safety and passenger experience of rail traffic. They make railways an increasingly attractive and environmentally friendly choice. Traffic control, capacity management and traffic planning ensure that goods and passengers can reach their destination safely and on schedule. Railway traffic is a very safe mode of transport, and Finland has been number one in the EU comparison in rail passenger safety between 2012 and 2024.

Fintraffic offers passenger information services, such as station information displays and announcements, and the Junalähdot.fi service, which improves passenger experience and reduces uncertainty during travel. In addition, Fintraffic maintains a fault reception service at its control centres 24 hours a day and, if necessary, initiates corrective measures to enable traffic to return to normal as quickly as possible.

The operation of the safety control room and traffic quality control room improves passenger safety and prevents vandalism, which ensures the safe passage of trains. Fintraffic also provides expert and training services to promote the development of the railway system as a whole.

Our services affect the punctuality of railway traffic, the capacity utilisation rate of the railway network, the customer experience, railway traffic costs and energy savings. Foresight and information sharing play a key role in preventing accidents, delays and environmental damage.



How we make an impact in road traffic

Fintraffic’s road traffic management services ensure smooth and safe traffic in Finland 24 hours a day. This is achieved by means of continuous surveillance of traffic and road conditions and by sharing an up-to-date situational picture to different user groups. Fintraffic produces 240,000 road camera images every day and will collect even more observations in the future through crowdsourcing.

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

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

Road weather services: Road weather services cover the entire Finnish road network, and their impact is particularly significant in reducing accidents. In 2023, road weather services reduced the number of accidents leading to personal injuries (HEVA) by 67.32 cases per year, bringing savings of almost EUR 30 million*.

Automatic traffic surveillance: The impact of automatic traffic surveillance in reducing accidents is considerable. In 2023, automatic traffic surveillance reduced the number of HEVA accidents by 47.99 cases per year, bringing savings of more than EUR 21 million.

Traffic lights: Traffic lights also have a significant impact on reducing accidents. In 2023, traffic lights reduced the number of HEVA accidents by 23.25 cases per year, bringing savings of more than EUR 10 million.

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

* Fintraffic Road Services Impact Assessment 2024, Traficon Ltd (based on 2023 data)



Business



AIR NAVIGATION SERVICES

Air traffic effectively ensures that Finland remains easily accessible

Finland boasts world-class air navigation services. The emphasis of our work lies on safety, reliability and punctuality. We are responsible for managing the use of Finland's airspace and providing air route services and air navigation services at 22 airports in Finland. We also provide air navigation training services, services for drone pilots and technical maintenance services at five airports in Sweden.



Revenue (74.2)

EUR 88.7 million

Personnel, average (420)

425

Customer satisfaction (3.8)

4.0

Number of overflights (59,000)

65,661

Area control provided services for (225,000) flights

241,876

Number of take-offs and landings at Helsinki-Vantaa Airport (144,000)

153,142



W

e design and maintain air navigation infrastructure and systems in accordance with international requirements. Cooperation at EU level reduces the environmental impact of aviation and increases safety and cost-effectiveness. Single European Sky (SES) – that is, a joint European airspace – aims to digitalise air navigation services in order to centrally manage and share aeronautical information.

Demand for flight route services increased in 2024, even though air traffic in Finland recovered more slowly than in the rest of Europe. Air navigation services were provided for nearly 242,000 flights in area control and for over 153,000 take-offs and landings at Helsinki Airport. The number of overflights through Finnish airspace increased by more than 65,000 flights.

Progress in strategic projects

Of Air Navigation Services' strategic projects, the procurement and deployment of the Multi Remote Operating Tower (MROT) progressed to tendering with system presentations and negotiations with

OUR STRATEGIC OBJECTIVES



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



Unmanned aviation and low-flight network operations have been safely and smoothly integrated into traditional air traffic services.



In the future, air navigation services will also be provided in the form of digital remote air traffic control services.



Our systems and operations have been harmonized so that in the future we can provide air navigation services, together with Estonia, across national borders.



We sell a lot of commercial services related to air navigation.

WHAT PROGRESS DID WE MAKE IN OUR GOALS IN 2024?

MROT (Multi Remote Operating Tower)

We launched the competitive tendering process for a remote air traffic control system.

We went through the procurement negotiation processes and carried out the supplier screening.

The final invitation to tender was published, and contract negotiations with the selected suppliers were initiated.

FINEST

The Concept of Operations (ConOps) was updated.

The legislative project decision was approved by the ministry.

Parliamentary consideration of the treaty is progressing.

AIRSPACE 2027

A programme organisation was put together, and the planning started.

The conceptualisation process in working group was completed.



tenderers taking place. The project, promoting cost efficiency, more flexible air navigation services and safety, would enable the provision of air traffic control services for several airports from a single workstation.

The preparation of a cross-border air navigation service in collaboration with Estonian Air Navigation Services (EANS) continued. The FINEST project aimed at air navigation cooperation has continued with the drafting of treaties at the national level.

The Airspace 2027 project was launched with the definition of the concept and marginal conditions. In addition to aviation safety, its key objectives include consideration of national defence needs, competitiveness and accessibility, environmental objectives and sustainability, and taking all airspace users into account.

The sale of air navigation services continued successfully. The first Georgian students completed their basic studies in June, and a new group began their studies in October. In 2024, also Finnish air traffic controllers graduated from their course.

Service of proven high quality

Based on the annual customer satisfaction survey, air navigation services remained functional and safe in the eyes of our customers. The overall score for services and cooperation given by our customers rose to 4.0 (3.8).

The operations of air navigation services are of a proven high quality, as the company was awarded the ISO9001 quality system certificate in June.

Development work continues

The aviation situational awareness application is about to be completed. It will be launched in spring 2025, as will the digital flight preparation application for general aviation. The development of digital situational awareness in air navigation and the services of other airspace users will continue in 2025.

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

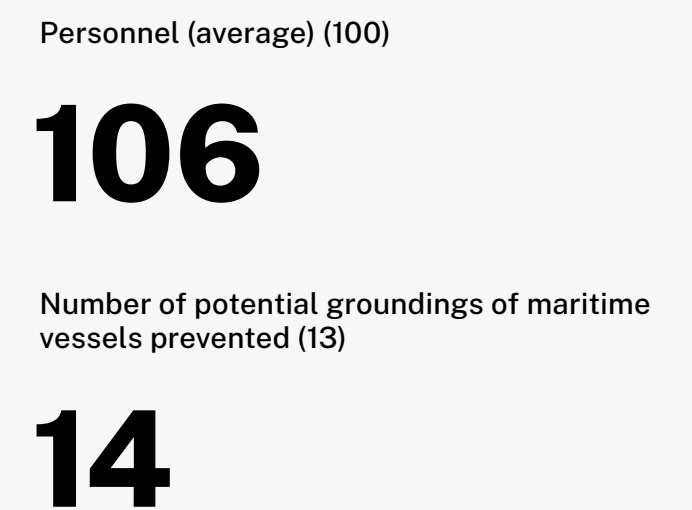
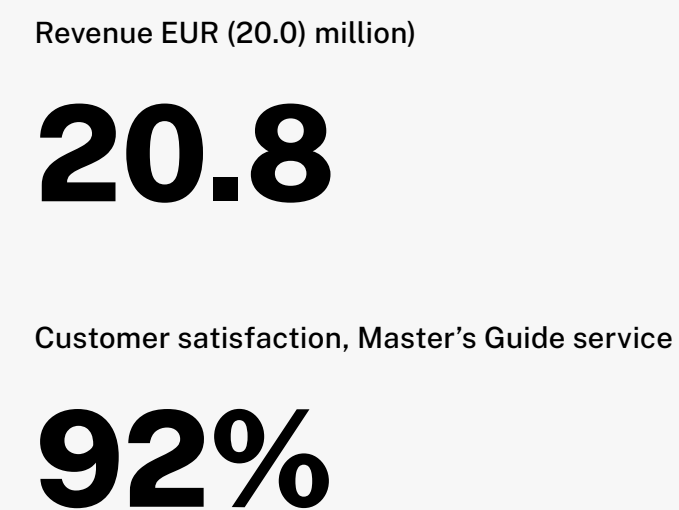
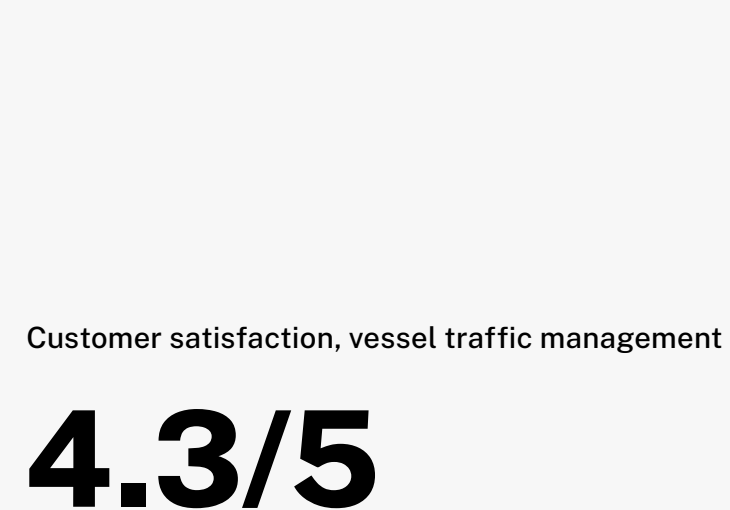




VESSEL TRAFFIC SERVICES

Finland lives off shipping

Functional and efficient maritime logistics are key to the success of Finland's foreign trade and maintaining competitiveness, as 96 per cent of our exports and imports are transported by sea. Fintraffic's Vessel Traffic Services is tasked with monitoring 24/7/365 that vessel traffic runs safely, smoothly and uninterrupted.





Fintraffic's Vessel Traffic Services ensures the safety and competitiveness of Finnish shipping and actively promotes digitalisation and the development of traffic ecosystems at the national and international level. Development work is carried out in maritime traffic service and management services and in maritime traffic information management systems. The service offering has been expanded with services that enhance maritime logistics and port operations and promote the management of environmental emissions.

Profound Baltic Sea expertise of vessel traffic service centres ensures safety in heavily trafficked waters

The operational reliability of our vessel traffic service centres was at a good level in 2024. Basic traffic management maintained its high standard and operated in line with agreements.

We managed traffic and notified vessels about any factors that may affect their passage, such as other traffic, potentially hazardous situations, weather and ice conditions, and failures in navigational aids.

OUR STRATEGIC OBJECTIVES



We provide world-class vessel traffic services and high-quality digital services for maritime transport and logistics.



We operate responsibly, invest in smart solutions, and support collaboration between stakeholders. We lead the way in industry development with innovative services and new technologies that enhance safety, improve logistics efficiency, and reduce environmental impact.



We make maritime transport safer and more low-emission, while improving the efficiency of Finland's maritime logistics. This reduces logistics costs, resulting in lower production costs for industry and more affordable prices for consumers — ultimately strengthening Finland's competitiveness.

WHAT PROGRESS DID WE MAKE IN OUR GOALS IN 2024?

In 2024, we strengthened our position as an internationally recognized forerunner in vessel traffic and digital services. In line with our strategy, we developed solutions that enhance maritime safety, improve logistics efficiency, and support environmental goals — while also reinforcing Finland's position in global competition.

A significant milestone was the progress of the national maritime traffic notification service NEMO according to the EU's set timeline. Alongside this, we introduced the Nautilus system, which modernizes the reporting process for small passenger vessels and supports the operations of authorities.



During the year, we potentially prevented 14 vessels from running aground. We also assisted vessels with navigation, and prevented near-misses from evolving into accidents, thereby also protecting fragile marine environments. The vessel traffic service centres also managed the national maritime safety radio traffic and emergency radio traffic in the Saimaa region.

The safety of vessel traffic was improved by introducing special transport safety zones and new vessel traffic meeting and overtaking prohibition areas.

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





RAILWAY TRAFFIC MANAGEMENT

Efficient and environmentally friendly railway traffic

Collaborating closely with our partners, it is our task to ensure that people can travel and transport goods on Finland's railways in a safe, smooth and environmentally friendly manner. Our work is significant for the country as a whole, as more than half a million trains and tens of millions of passengers travel in the Finnish rail network every year. It is our goal to ensure that passengers and cargo reach their destination safely.



Revenue EUR (90.1) million

86.5

On time or early (-3.6%)

88.4%

Personnel (average) (477)

495

Failure reports (+5%)

17,074

Number of trains (+4.2% compared to 2023)

521,166

Number of calls, of which 97.9 % were answered in less than five minutes

1,683,911



O

ur services include railway traffic control and management, and control centre and failure control centre services. In addition, our control centre is responsible for 24/7 supervision and use of the catenary system across the country. We also provide passenger information services so that passengers can receive up-to-date information through different channels to support their journey.

For Fintraffic's Railway Traffic Management, 2024 was a significant year of development and renewal. We took important steps to develop Finnish rail traffic and enhance safety. Our role as a developer and driver of digitalisation means, among other things, the utilisation of new technologies and digital solutions to make railway traffic a safer, more efficient and more environmentally friendly mode of traffic than before.

The focus of our development work was on the Digirail project. Its development and verification phase progressed as planned. With the funding ensured for the implementation phase, the project can exceed as planned. The implementation of the first commercial line section of Digirail (EKA) progressed as expected. The procurements made create a strong foundation for modernising Finnish railways.

OUR STRATEGIC OBJECTIVES



In the implementation phase of Digirail, we build the benefits the digitalisation of railways can provide. Safety and reliability serve as our starting points.



The first commercial line section (EKA) developed by us will be completed by 2028.



We provide our services flexibly and efficiently, enabling smooth travel.



The knowledge base of the railway system enables the utilisation of data for transport needs.

WHAT PROGRESS DID WE MAKE IN OUR GOALS IN 2024?

We secured the funding for the implementation phase of Digirail.

We completed the timetable-critical procurements for the first commercial line section of the Digirail project (EKA), and the construction began.

We transferred the provision of rail yard traffic control services largely into our own hands using remote control to improve efficiency and safety.

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



We promoted the development of remote control systems as planned. Several successful deployments were made in the project to reform the remote traffic control system in Northern Finland. They enabled transferring the Oulu railway yard under remote control. A similar project was carried out at the Kuopio railway yard. As a result, the costs of traffic control decreased significantly and, at the same time, the standard of service improved. Railway traffic control is now fully centralised to control centres, with no separate single workstations remaining.

The capacity management service enabling competition in railway traffic was expanded as planned. At the end of the year, the SAAGA capacity management system was in use in 61 localities.

Our goal is not only to improve the punctuality and capacity of railway traffic but also to increase the security of supply, in which we made investments in 2024. We developed our preparedness and reliability in ways that support the mobility and functioning of society.

Digitalisation enables the development of new kinds of services and operating models, such as the utilisation of digital twins and ecosystem services, throughout the sector. At the end of the year, we launched a development project to build a digital twin of the railways.

Read more about Railway Traffic Management:

www.fintraffic.fi/en/railway-traffic





ROAD TRAFFIC MANAGEMENT

Safe and smooth traffic flow on the road 24/7/365

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



Revenue EUR (54.9) million

54.5

Personnel (91)

96

Traffic bulletins, more than

10,000

Calls, nearly

120,000

Contractor messages, more than

50,000

Automated notifications on prevailing traffic or weather conditions in tunnel or open road sections

100,000



O

ur work encompasses everything from technical system design for roads and tunnels to continuous traffic monitoring, the provision of road weather data, and the formation and distribution of a real-time situational picture of traffic.

Improved efficiency in road and tunnel infrastructure

In road traffic management, 2024 was an important development phase in which investments focused especially on improving operational reliability and renewal in accordance with lifecycle management. New solutions were implemented, among other things, in various tunnel projects, the telecommunications network, road weather stations and roadside traffic control devices and systems. In addition, we developed the lifecycle management of a wide range of devices further. We also engaged in continuous international development work to build an enhanced situational picture and to ensure reliability.

Satisfaction in services at a good level

Traffic in the road network was relatively smooth, and large-scale deviations were avoided. We collected

STRATEGIC OBJECTIVES



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



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



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



WHAT PROGRESS DID WE MAKE IN OUR GOALS IN 2024?

The development of collaborative intelligent transport systems continued. For the first time in Finland, we were able to pilot the exchange of information between traffic lights and vehicles using EU standards. The Data for Road Safety cooperation reached a milestone when Fintraffic's traffic bulletins were distributed directly to the navigation systems of different car manufacturers.

Lifecycle upgrades were made, for example, in the telecommunications network, road weather stations, traffic lights, automatic traffic surveillance, and roadside traffic control devices and systems. At tunnel sites, the renovation of the Hämeenlinna tunnel was successfully completed, the renewal of the Vuosaari tunnel proceeded to improving the backup route, and several control systems were also renewed at other tunnel sites.

In cooperation with the University of Jyväskylä, Fintraffic started to build data models that identify road traffic risks.



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

The information on weather and road conditions also flowed directly to road users who heard our traffic bulletins on the radio, for example, or received the information directly to their vehicle's navigator. In total, we sent more than 10,000 traffic bulletins and received nearly 120,000 customer calls. According to the 2024 road user satisfaction survey, private car users in particular were more satisfied with the provision of information on road traffic disruptions than before. The increase from the previous year was as high as three percentage points. For professional drivers, satisfaction had remained at the same good level as in previous years.

Read more about Road Traffic Management:

www.fintraffic.fi/en/road_traffic





DIGITAL ECOSYSTEM SERVICES

Use of Fintraffic's digital services almost tripled

The year 2024 was a huge year of growth in our digital services – the number of visits almost tripled compared to the previous year. The Fintraffic App, which was published at the end of 2023, established itself as the spearhead of our services.



The use of Fintraffic App accounted for two thirds of the use of Fintraffic's digital services in 2024. The application gathered 56,000 downloads, of which up to 45,000 remained active. Our determined development efforts were recognised in October when the Customer Experience Profes-

Revenue EUR (3.1) million

3.4

Users of digital services

7.8

Personnel 7

7

Interface calls made to Digitraffic (4.7) bn

6.1

Number of members in the traffic data ecosystem (200)

226

Interface calls made to Digitransit (13) bn

17



sionals Association CXPA Finland awarded our application with the Customer Experience Award 2024. In addition, the app rose among the top free non-game applications downloaded in the app store.

More than 6 billion interface calls were made to Fintraffic's Digitraffic data service, 29% more than in 2023. 17 billion interface calls were made to the Digitransit platform, developing route planners, 30% more than in the previous year.

Around 40 new actors joined the traffic data ecosystem, currently involving 226 organisations. The perceived benefit of belonging to the ecosystem has remained at a good level. On a scale of one to five, our operations were given a rating of 3.85 for their inspirational value. The rating for the perceived support of the cooperation for services development was rated 3.6.

The Traffic Data Service Cluster was officially established in May. The cluster seeks cost-effective ways to lower the threshold for Finnish companies' export activities, promotes the members' export business and opens up markets systematically with the members.

STRATEGIC OBJECTIVES



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



Fintraffic accelerates exports in the sector.



Fintraffic's services have a significant impact on society.



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

WHAT PROGRESS DID WE MAKE IN OUR STRATEGIC GOALS IN 2024?

- The national traffic information database was completed. The data can be used to combine information on public transport and transport services for, for example, route planners, passenger information systems and ticket systems.
- The new park-and-ride information service provides nationally compiled information on the locations, capacity, services, pricing and operators of parking areas.
- The utilisation of traffic data increased by more than 30%.
- We continued to cooperate closely with HSL to develop travel information. In addition, cooperation with Bauer Media continued to develop AI-assisted traffic bulletins. Cooperation discussions were also conducted with media houses and insurance companies.
- The members of the Traffic Data Service Cluster made their first deals. The value of sales leads reached approximately EUR 15 million.
- According to an impact analysis updated by the consulting firm FLOU, Fintraffic's share of the Finnish transport data economy grew to approximately EUR 54 million (approx. EUR 40 million in 2023).



Sustainability Report



ESRS 2 General information

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

Basic information

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

The business areas include air navigation services, vessel traffic services, railway traffic management, road traffic management and traffic data ecosystem services.

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

Basis for preparation

The sustainability report mainly reports on the activities at the Fintraffic Group level.

The reporting period is the same as in financial reporting, i.e. the financial year from 1 January 2024 to 31 December 2024.

This year, the sustainability report is published as part of the annual report. The reporting requirements laid down in the EU's Corporate Sustainability Reporting Directive (CSRD) oblige the Fintraffic Group from 2026 onwards, starting from the data for 2025. At this point, the report will become part of the Board of Directors' report. In previous years, Fintraffic has prepared its report referring to the requirements of the Global Reporting Initiative's (GRI) Universal Standards.

We have decided to gradually transition to reporting as required by the new legislation from 2024 onwards and to supplement the data and develop the preparation of the sustainability report annually. The requirements laid down in the CSRD have guided the content and structure of the 2024 report.

The sustainability report 2024 has not been verified, but we have carried out pre-verification of the parts ESRS2, E1, G1 and S1.

The reported sustainability topics and sustainability indicators are based on a double materiality analysis carried out in Fintraffic in autumn 2023, which was specified by a Board of Directors decision of 30 August 2024. More information on the materiality analysis and its results is provided on pages 56–57.



Based on the double materiality analysis, we report on the following sustainability themes that have proved material to Fintraffic:

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

Changes in the preparation and presentation of sustainability information

The report was prepared by Fintraffic Group’s experts and members of the sustainability steering group. The report was discussed by the Group Management Team and the Audit Committee and approved by the Group’s Board of Directors.

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

Fintraffic’s sustainability report has been prepared in accordance with the new European Sustainability Reporting Standards (ESRS), as required by the EU Corporate Sustainability Reporting Directive (CSRD) and other applicable laws and guidelines. In preparing the report, no deviations have been made regarding the following: time horizons; value chain assessment; sources of uncertainty in the assessments and results; changes in the preparation or presentation of sustainability-related information;

reporting errors from previous periods; disclosure requirements arising from other legislation or generally accepted sustainability reporting practices; the use of references; or the provisions related to phased implementation.

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

Board of Directors

The Board of Directors consists of six members, one of whom acts as the chair. The board has three men and three women, so the gender distribution of the board is 50/50. There is no employee representation in the board. Members of the Board must have a versatile experience that promotes the company’s business. All members of the Board are independent of the company.

Group Management Team

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

Committees of the Board of Directors

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

The role of the Group Management

The Board of Directors reviews the risk assessment twice a year and sets related objectives.

In accordance with the sustainability policy, sustainability has been integrated into Fintraffic’s strategy and business operations. Every year, we update the material impacts, risks and opportunities of our business operations. Specific control measures and procedures defined in the risk management policy and the internal audit guidelines are used to manage impacts, risks and opportunities. We actively develop competence related to sustainability at different levels of the organisation.

Our responsibility is divided into the responsibility for the environment (E), responsibility for people and

communities (S) and responsibility for good governance (G). The objectives, measures and metrics related to these themes and responsibilities for the management of corporate responsibility are described in Fintraffic’s Sustainability Programme document.

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

Fintraffic’s administrative, management and supervisory bodies regularly discuss the progress of the goals recorded in the sustainability programme. The sustainability programme includes environmental responsibility, social corporate responsibility and the targets, measures and resources of good governance. These are monitored through certain indicators in the short, medium and long term. The monitoring is carried out through Fintraffic’s strategy and operational planning.

Through the practices below, Fintraffic ensures that the administrative, management and supervisory bodies receive up-to-date and comprehensive information on the company’s material impacts, risks and opportunities related to sustainability.

- Fintraffic’s administrative, management and supervisory bodies are regularly informed about



- sustainability issues and related matters during the reporting period. This information helps to ensure that the members of the bodies are adequately informed and able to carry out their tasks effectively.
- The results of risk management, including risks related to sustainability, are presented to the Board of Directors twice a year. In its meetings, the Board also regularly discusses the reviews of different aspects of sustainability presented by the Group's management and experts.
 - Fintraffic's sustainability report describes how the administrative, management and supervisory bodies take into account different impacts, risks and opportunities when supervising the company's strategy, decisions on major business transactions and the risk management process. The report also provides a list of material impacts, risks and opportunities that the administrative, management and supervisory bodies have addressed during the reporting period.
 - Risk reports and other relevant information are regularly discussed in the meetings of the Management Team and the Board of Directors.

Fintraffic's sustainability programme describes the following practices that Fintraffic uses to ensure that the administrative, management and supervisory bodies receive up-to-date and comprehensive infor-

mation on the material impacts, risks and opportunities, the implementation of the due diligence process and the results and effectiveness of the policies, actions, indicators and objectives intended to address them:

Fintraffic's employees

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

Business areas and support services

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

Sustainability group

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

Group Management Team

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

Audit Committee

- Monitors and evaluates regularly the development of the strategy and the sustainability programme. Assists the Board of Directors in managing and supervising sustainability issues.
- Reports to the Board on the integrity, process and verification of sustainability reporting.
- Monitors the verification processes of sustainability reporting, assesses the appropriateness of Fintraffic's controls and informs the Board of Directors of the results of the verification. The committee is also responsible for the selection and evaluation of the verification body.

Fintraffic Board of Directors

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

Sustainability is at the core of Fintraffic's business operations. The sustainability programme, which combines sustainability objectives with Fintraffic's strategy, is taken into account in strategy and operational planning. The sustainability programme helps to ensure that the company's operations are sustainable.

The final report of Fintraffic's double materiality analysis was updated in October 2024. It contains a comprehensive list of material impacts, risks and opportunities. The table summarizes the most important findings.



Fintraffic’s material sustainability topics

Topical ESRS standard	Material ESRS sustainability issues	Link to Fintraffic’s operations
ESRS E1 Climate change	Climate change mitigation	<ul style="list-style-type: none">Reducing GHG emissions from traffic, promoting multimodal travel and transport chains and low-carbon transport from the perspective of new business opportunities and reducing emissions.GHG emissions throughout the value chain. Energy consumption, travel, procurement and fuel consumption. Energy-related transition risks and cost increases.
	Climate change adaptation	<ul style="list-style-type: none">Extreme weather events and disruptions in energy supply may damage traffic control infrastructure, weakening Fintraffic’s ability to provide traffic control services and endangering traffic safety and smooth flow of traffic.
ESRS S1 Own workforce	Working conditions: Health, safety and wellbeing, social dialogue	<ul style="list-style-type: none">Promoting the health, safety and wellbeing of employees. Prevention of exhaustion and stress caused by workload in particular.
	Equal treatment and equal opportunities for all, other rights	<ul style="list-style-type: none">Competence development and availability of skilled labour. Impacts of industrial action on service level.Promoting an equal and inclusive work community and its impact on employer image and ability to recruit. Employee privacy (including data security).
ESRS S3 Affected communities	Communities’ economic, social and cultural rights	<ul style="list-style-type: none">The impacts of Fintraffic’s services on the comprehensive security of society (including cyber security).Promoting regional and international accessibility and smooth logistics.The benefits of the automation and digitalisation of the traffic sector for society.
ESRS S4 Consumers and end-users	Personal safety and social inclusion of consumers and/or end-users	<ul style="list-style-type: none">Promoting the safety of transport users.Improving the accessibility and attractiveness of public transport.Developing the traffic data ecosystem and, consequently, Fintraffic’s attractiveness as a partner.
ESRS G1 Business conduct	Ethical conduct of business and good governance	<ul style="list-style-type: none">Responsible, sustainable and cost-effective use of tax revenue.Good governance, anti-corruption and anti-bribery.

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

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

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

The Board of Directors decides, on a proposal from the Personnel Committee, on the payment of incentive bonuses to the CEO and the members of the Management Team reporting directly to the CEO. The Board decides annually on the comprehensive remuneration policy for employees, which includes the terms and conditions of the incentive scheme.

- Remuneration for personnel as a whole seeks to:
- attract skilled and motivated employees to the Group;
 - engage personnel and commit them to both the Group and its objectives;
 - motivate personnel to achieve the targets defined by their employer.



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

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

Remuneration should be moderate and appropriate.

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

Sustainability has been taken into account in target setting and the performance incentive scheme. In the incentive bonus scheme for top management in 2024, 60% of the incentive bonus criteria were determined in accordance with sustainability targets³. For example, the CEO and all members of the Group Management Team had a performance bonus target for social responsibility, more specifically employee satisfaction, which was indicator-based (eNPS)⁴. For other employees, the number of sustainability targets varied depending on the position and employee group, but sustainability targets were significant for all those within the scope of performance bonuses.

The amount of the incentive bonus for the Fintraffic Group CEO and the Management Team at the target

level is 15 per cent of annual earnings. For exceptional performance, this may be 30 per cent of annual earnings. The corresponding percentages for the members of the subsidiaries’ management teams are 10 and 20 per cent and for supervisors and experts 5 and 10 per cent. Other employees are covered by a bonus scheme based on common objectives, i.e. no personal targets are set for them. Typically, such professional groups include traffic controllers and other employees engaged in operational work. The Group CEO, together with each subsidiary’s CEO, sets the annual common objectives for the subsidiary. The objectives are approved by each company’s board of directors. The objectives being measured are related to the company’s financial, operational and safety targets as well as effectiveness and sustainability. The maximum amount of the performance bonus is 2 per cent of the total annual salary of the employees covered by the company’s remuneration scheme for the year in question.

Statement on the sustainability due diligence process (GOV-4)

Fintraffic discloses information related to its sustainability due diligence process in this report under several relevant sections.

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

The requirements and roles/responsibilities of risk

management are described in Fintraffic’s risk management policy and the company-specific operating models and procedures that may specify it based on different norms and requirements. The requirements for risk management reporting are described for the Management Team and the Board of Directors in the Corporate Governance model and, for others, in separate operations manuals and process descriptions. The descriptions of the control system have been made in the same way. The elements of sustainability are part of normal risk management, processing and supervision.

Sustainability risks are part of other risk management actions, and the scope of application covers the entire Group and all areas. Both are subject to risk management, i.e. all sustainability risks in the operating environment and changes in them are monitored and assessed at least twice a year. In spring 2025, a separate operating model will be created for assessing sustainability risks and its coverage will be assessed.

Risks are assessed in the Corporate Governance model on a scale 4*4, where the values 8–9 result in planned measures and 12–16 immediate planned measures. Risks are assessed by business, service and operation. The most critical and potentially critical risks are reported twice a year to Fintraffic’s Management Team, the Board of Directors’ Audit Committee and the Board of Directors.

During the first cycle of sustainability reporting, the greatest risks were identified in the experts’ use of time, sustainability competence and the identification of sustainability impact chains. As this is the first cycle, the aim is to reduce these risks by training experts and by creating uniform operating models and sharing information. The first proper assessment of the risks associated with sustainability reporting will be carried out in the risk reporting for the first half of 2025, as then we will have sufficient information on processes, models and observed risks for the first time. The focus will probably be on current knowledge in managing sustainability chains.

The principle of risk management operating models is to identify and process risks and assign the responsibility for them to employees. The identified risks are linked to other operating processes in such a manner that risk management directly affects the activities involving a risk. Sustainability risks are mapped by area as specified under item b) and processed so that they directly affect operations. The identification, processing and impact assessment are documented.

The corporate governance model requires a risk report twice a year to the Fintraffic Group’s Management Team, the Board of Directors’ Audit Committee and the Board of Directors. The reporting periods are per situation of March in April and per the situation of September in October.



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



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



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



Topical ESRS standard	Sustainability issue	Includes sub-sub-topics	Brief description of IRO	Detailed description of IRO	Type	Estimated position in the value chain	Actual/potential impact or financial impact	Estimated potential time span for implementation (Short = fiscal year) (Medium = end of fiscal year – five years) (Long = more than five years)
ESRS S3 Affected communities	Security-related impacts	Security-related impacts	Positive impacts on the comprehensive security of society	In accordance with its basic assignment, Fintraffic is responsible for providing traffic control services that are critical for the functioning of society. In addition, Fintraffic participates in maintaining national security through cooperation between defence and security authorities and is a key actor in Finland's security of supply.	Positive impact	Downstream	Actual	All
ESRS S3 Affected communities	Security-related impacts	Security-related impacts	Decreased road safety	If the service level of traffic control has significantly deteriorated or its reliability has become threatened.	Negative impact	Downstream	Potential	Medium-Long
ESRS S3 Affected communities	Financial rights of communities (own)	Appropriate housing conditions	The benefits of traffic automation and digitalisation for society	Increasing the automation and digitalisation of Fintraffic's traffic control and management services streamlines and enhances travel chains, bringing cost savings to society.	Positive impact	Downstream	Potential	Medium-Long
ESRS S3 Affected communities	Security-related impacts	Security-related impacts	Promoting regional and international accessibility and smooth logistics	Fintraffic's services improve the accessibility of Finland and its different regions, for example, by creating preconditions for connecting regional centres. Real-time information at the traffic system level streamlines travel chains, enhancing logistics and strengthening the competitiveness of society.	Positive impact	Downstream	Actual	All
ESRS S4 Consumers and end-users	Access to products and services	Access to products and services	Successful development of the data ecosystem	The successful development of Fintraffic's traffic data ecosystem may improve Fintraffic's recognition as a partner and create new business opportunities for Fintraffic.	Opportunity	Downstream	Potential	Medium-Long
ESRS S4 Consumers and end-users	Access to products and services	Access to products and services	Enabling new public transport services	Fintraffic's traffic data ecosystem enables the creation of new public transport services for consumers to use.	Positive impact	Downstream	Actual	All
ESRS S4 Consumers and end-users	Access to products and services	Access to products and services	Increasing the attractiveness of public transport	Fintraffic's services improve the flow of public transport (reliability, time spent), thus increasing its attractiveness.	Positive impact	Downstream	Actual	All



Topical ESRS standard	Sustainability issue	Includes sub-sub-topics	Brief description of IRO	Detailed description of IRO	Type	Estimated position in the value chain	Actual/potential impact or financial impact	Estimated potential time span for implementation <small>(Short = fiscal year) (Medium = end of fiscal year – five years) (Long = more than five years)</small>
ESRS S4 Consumers and end-users	Non-discrimination	Non-discrimination	Improving the accessibility of traffic	The Fintraffic services can be used to provide accessibility information to persons with reduced mobility. In addition, designing services, websites and mobile applications so that they are more accessible, especially to persons with disabilities.	Positive impact	Downstream	Actual	All
ESRS S4 Consumers and end-users	Personal safety of consumers and/or end-users	Health and safety	Improving the safety of transport users	Fintraffic's services improve traffic safety on land, at sea and in the air, reducing accidents and preventing hazardous and threatening situations.	Positive impact	Downstream	Actual	All
ESRS G1 Business conduct	Corruption and bribery	Prevention and detection, including training	Ensuring the responsible and cost-efficient use of taxpayer funds	Through its services, Fintraffic allocates resources towards the advancement of sustainability objectives that generate positive impacts for people, the environment, and society as a whole.	Positive impact	Own actions	Potential	Medium-Long



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

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

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

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

The strategy approved by Fintraffic's Board of Directors on 17 June 2024 is based on Fintraffic's ownership strategy adopted by the Government on 16 October 2019. It defines Fintraffic's duties as follows:

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

The revenue from traffic control services and digital ecosystem services provided by Fintraffic mainly consists of road, rail and maritime traffic management services provided to the Finnish Transport Infrastructure Agency, and air navigation services that are provided to airlines and airports. The Group also provides services to other parties, such as Traficom, cities and ports, and international customers.

No significant changes were made to the services provided by Fintraffic in 2024. Digital ecosystem services were identified as the Group's fifth business area in 2024.

Fintraffic has segmented its customers (customer segments are presented in the Annual Review on page 15) and continuously develops its customer relationship management model. There were no significant changes in customer relationships in 2024. As part of its strategy work and the development of its customer relationships, Fintraffic will prepare target states for different customer segments in 2025.

All Fintraffic employees work in Finland. More detailed information on personnel-related matters is provided in section S1 of the report.

So far, the distribution of total revenues by major ESRS sectors has not been defined. Fintraffic monitors the development of the regulation and reports on it as the regulation develops.

Fintraffic implements its strategy in three strategic programmes: development of traffic management, productised digital ecosystem services and uniform operating methods. On page 55 is a description of how strategic programmes are linked to the Group's strategic objectives. The figure also shows the key contents of the programmes.

Through the measures included in the strategic programmes, Fintraffic is essentially implementing the targets set in the sustainability programme. The sustainability programme describes the measures, indicators and required resources related to each target. Measures related to each area of sustainability are described separately in sections E, S and G.

Interests and views of stakeholders (SBM-2)

(a) Stakeholder engagement:

i. The undertaking's key stakeholders

Fintraffic's strategic customers and partners are: the Finnish Transport Infrastructure Agency, Finavia and airlines, Traficom, and ports and cities.

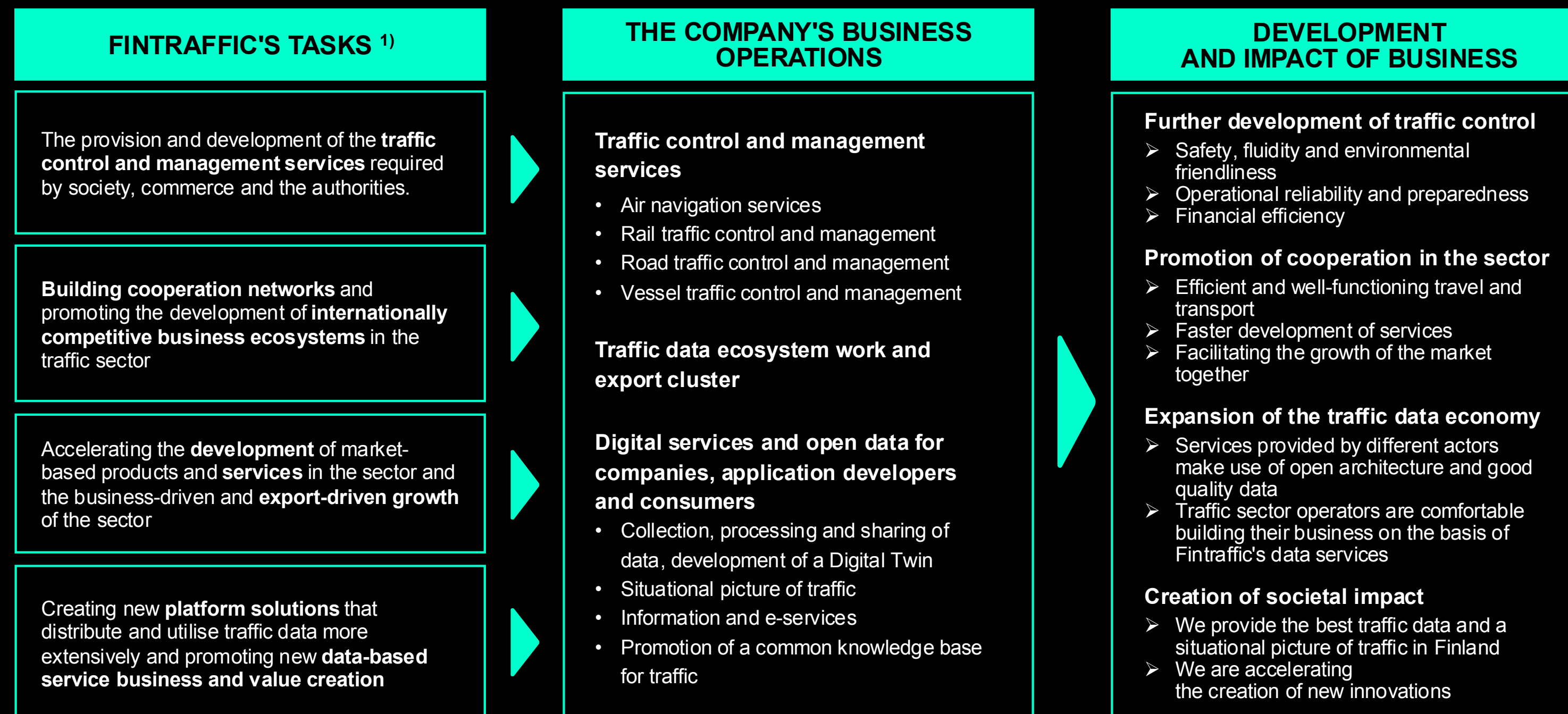
Other key partners include the Finnish Defence Forces, the Finnish Border Guard, Customs and the Police, ELY Centres, and transport sector operators.

ii. Stakeholder engagement:

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

The Group Management Team has assigned responsible persons for key stakeholders. They ensure regular contacts with stakeholders and bring stakeholders' expectations to the strategy process.

Fintraffic's tasks and business operations



¹⁾ Fintraffic's ownership strategy 16 October 2019



Objectives will be implemented through strategic programmes

Societal impact and customer satisfaction

Strategic objectives

Safe, smooth and environmentally-friendly traffic

Operational reliability and preparedness

Financial efficiency

Smooth cooperation between traffic sector operators

The growing traffic data economy, market and export

Healthy and happy personnel, a learning work community and a winning corporate culture

High-quality management

Strategic programmes

TRAFFIC CONTROL DEVELOPMENT

Key actions

- Further development of the traffic situation picture and preparedness
- Increasing the degree of automation, digitalisation of traffic and new service solutions
- Utilisation of data, analytics and artificial intelligence, promoting a common knowledge base for traffic
- Development of customer relationships

PRODUCTISED DIGITAL ECOSYSTEM SERVICES

Key actions

- Development of the data ecosystem
- Collection, processing and sharing of data
- Development of a Digital Twin, promotion of a common knowledge base for traffic
- Statutory situational picture services, e-services and information services



FINTRAFFIC'S UNIFORM OPERATING PRACTICES

Key actions

- Clarification of management • Competence, leadership and corporate culture • Enterprise architecture • Development of capabilities



The strategy describes the company's business operations portfolio, key financial assumptions and earnings models.

Fintraffic actively participates in public debate on themes related to the traffic sector's operating environment. Fintraffic thinks it is important for decision-making to consider perspectives relating to traffic management and raising the degree of digitalisation in the traffic sector to ensure the best possible implementation of a safe, smooth and low-emission transport system in Finland.

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

Issues concerning the stakeholders' own workforce are discussed in section S1 (page 84).

iii. How engagement is organised:

Fintraffic has established operating models for key customers (Finnish Transport Infrastructure Agency, Traficom, Finavia). For example, annual consultation and discussion meetings are held with key aviation operators. There is no established operating model for other end-user customers (especially consumers). The operating model will be determined in 2025.

iv. Purpose of engagement:

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

We have persons responsible assigned for our key stakeholders in the Group Management Team. In addition to keeping in regular contact with our stakeholders, we request them to give feedback on our activities. In 2024, targeted stakeholder and customer satisfaction surveys were conducted, and Fintraffic's third corporate image survey was carried out among the general public. Both the stakeholder surveys and the reputation survey indicated increased confidence in Fintraffic and an improved awareness of the company.

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

Fintraffic takes the stakeholders' views into account through the due diligence obligation and materiality assessment processes.

Fintraffic carried out the process of identifying and assessing material sustainability impacts, risks and opportunities in accordance with the principles of double materiality analysis for the first time in 2023.

As part of the double materiality process, the views of key stakeholders were examined through interviews. The views focused on issues such as transport safety from various perspectives, the promotion of low emissions from traffic and accessibility of transport, the benefits of the data ecosystem facilitated by Fintraffic, and the health and wellbeing of the employees.

The feedback received from stakeholders is systematically taken into account in decision-making, especially in environmental impact assessments and the development of Fintraffic's digital and green services.

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

i. Changes due to stakeholder views:

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

ii. Planned follow-up measures and their schedule:

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

iii. Impacts of changes on stakeholder relations:

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

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

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

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

The materiality analysis highlighted the societal impact of Fintraffic, i.e., the benefits generated for the traffic ecosystem and users. In environmental issues, the focus is on topics related to emissions and the prevention of environmental damage. The focus of financial responsibility is on sustainable use of tax revenue and good governance. The sustainability themes related to workforce are still strongly represented.

Fintraffic has recognised that the traffic control infrastructure may have negative impacts on biodiversity. However, it should be noted that the double materiality analysis has not identified that our premises, which are mainly located in the Helsinki



Metropolitan Area, would have negative impacts on biodiversity based on their location.

Fintraffic has identified the risk related to human rights violations in the value chain. The risk covers reputational risks and negative impacts on working conditions and equality. However, it is important to note that, as a result of the double materiality analysis, this risk and the negative impact have not become material. This means that although the risk has been identified, it is currently not a major cause of concern. Nevertheless, it is important that we actively continue to monitor risks and make every effort to ensure that our value chain remains ethical and respects human rights. We are committed to continuously developing our practices and reacting quickly to any changes.

SBM-3 is discussed in the table where IROs are linked to the business model and strategy.

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

Identifying and assessing material impacts, risks and opportunities:

Fintraffic uses the company’s risk management process to identify the impacts, risks and opportunities related to sustainability and to assess their materiality. A more detailed systematic approach will

be described and adopted during the first quarter of 2025.

Fintraffic carried out the process of identifying and assessing material sustainability impacts, risks and opportunities in accordance with the principles of double materiality analysis for the first time in 2023. The methods used in the process included reviews based on public and internal materials, stakeholder interviews, the materiality assessments of Fintraffic experts and management, and working group meetings. Most of Fintraffic’s Management Team members were involved in the materiality assessment process, and the entire management team validated its results. The Board of Director’s Audit Committee reviewed the materiality assessment at its meeting on 28 November 2023. The Board confirmed the assessment on 5 February 2024. Fintraffic's experts updated the results of the double materiality analysis conducted in 2023 based on EFRAG’s datapoints.

The outcomes of the updated double materiality analysis were validated by Fintraffic’s Sustainability Group on 24 June 2024, by the Group Executive Team on 14 August 2024, and by the Audit Committee on 20 August 2024.

Fintraffic’s Board of Directors approved the final results of the double materiality analysis on 30 August 2024.

Understanding the context: background analysis and consultation with stakeholder

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

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

Identifying the sustainability-related impacts, risks and opportunities

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

The impacts, risks and opportunities were identified at a general level, however taking account of the special features of Fintraffic’s different modes of transport. The identification did not provide a more in-depth analysis of individual activities, business relationships or geographical areas. Many of the identified impacts were found to be linked to financial risks, such as increased costs or reputational damage. For example, dependencies related to personnel and their links to potential risks were also identified, relating to, for example, employee competence, health and wellbeing.

Assessment and materiality assessment of identified impacts, risks and opportunities

The materiality of the identified impacts, risks and opportunities was assessed in accordance with the



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

The materiality value of the impacts was formed from the averages of the severity and likelihood scores given by each participant in the assessment. In the same way, the materiality value of the risks and opportunities was formed from the averages of the magnitude and likelihood scores of the related financial effects. The double materiality value of each sustainability issue was determined as the average of all its assessed impacts, risks and opportunities. A calculated median of all assessed impacts, risks and opportunities was used as the quantitative threshold for materiality. Finally, the results were also assessed qualitatively. On this basis, some clarifications and limitations were made to the assessment in joint agreement.

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

The following tables list all ESRS 2 disclosure requirements and six standards that were relevant to Fintraffic and guided the preparation of our sustainability report. We have excluded all reporting requirements for E2 pollution, E3 water and marine resources, E4 biodiversity and ecosystems and S2 workers in the value chain because they are not material to our operations.

Tables can be used to find information related to a specific disclosure requirement (DR) in sustainability statements. The tables also show where we have placed the information related to a specific disclosure requirement that fall outside the scope of the sustainability report and have been 'included by reference' either in the management’s review or final accounts in this report of the Board of Directors or in the sustainability policy and sustainability programme published as a separate report. In cases where we do not yet have information on the disclosure requirement, the reference is not made.

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

Identifying and assessing material impacts, risks and opportunities

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

Understanding the context

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

Assessment of impacts, risks and opportunities / Quantitative materiality threshold

The severity of impacts, risks and opportunities, the magnitude of financial effects and the likelihood of their materialisation were assessed on a scale of 1 to 4.

The materiality value was based on the averages of the assessments and the calculated median was used as the quantitative threshold. Finally, the results were also assessed qualitatively. On this basis, some clarifications and limitations were made to the assessment in joint agreement.

Double materiality analysis

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

Information based on other EU legislation (annex B):

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



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS 2 GOV-1	Paragraph 21 (d)	Board's gender diversity	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	44
ESRS 2 GOV-1	Paragraph 21 (e)	Percentage of board members who are independent			Delegated Regulation (EU) 2020/1816, Annex II		Material	44
ESRS 2 GOV-4	Paragraph 30	Statement on sustainability due diligence	Indicator number 10 Table #3 of Annex 1				Material	47
ESRS 2 SBM-1	Paragraph 40 (d) i	Involvement in activities related to fossil fuel activities	Indicator number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Non-material	-
ESRS 2 SBM-1	Paragraph 40 (d) ii	Involvement in activities related to chemical production	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Non-material	-
ESRS 2 SBM-1	Paragraph 40 (d) iii	Involvement in activities related to controversial weapons paragraph	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Non-material	-
ESRS 2 SBM-1	Paragraph 40 (d) iv	Involvement in activities related to cultivation and production of tobacco			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Non-material	-
ESRS E1-1	Paragraph 14	Transition plan to reach climate neutrality by 2050				Regulation (EU) 2021/1119, Article 2(1)	Material	72-73



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS E1-1	Paragraph 16 (g)	Undertakings excluded from Paris-aligned Benchmarks		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book –Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Material	73
ESRS E1-4	Paragraph 34	GHG emission reduction targets	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book –Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Material	79-81
ESRS E1-5	Paragraph 38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex 1				Non-material	-
ESRS E1-5	Paragraph 37	Energy consumption and mix	Indicator number 5 Table #1 of Annex 1				Non-material	-
ESRS E1-5	Paragraphs 40 to 43	Energy intensity associated with activities in high climate impact sectors	Indicator number 6 Table #1 of Annex 1				Non-material	-
ESRS E1-6	Paragraph 44	Gross Scope 1, 2, 3 and Total GHG emissions	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book –Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Material	82



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS E1-6	Paragraphs 53 to 55	Gross GHG emissions intensity	Indicator number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 3: Banking book –Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Non-material	-
ESRS E1-7	Paragraph 56	GHG removals and carbon credits				Regulation (EU) 2021/1119, Article 2(1)	Non-material	-
ESRS E1-9	Paragraph 66	Exposure of the benchmark portfolio to climate-related physical risks			Delegated Regulation (EU) 2020/1818, Annex II; Delegated Regulation (EU) 2020/1816, Annex II		Material	76
ESRS E1-9	Paragraph 66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book -Climate change physical risk: Exposures subject to physical risk.			Material	76, 83
ESRS E1-9	Paragraph 66 (c)	Location of significant assets at material physical risk		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book -Climate change physical risk: Exposures subject to physical risk.			Material	76, 83



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS E1-9	Paragraph 67 (c)	Breakdown of the carrying value of an undertaking’s real estate assets by energy-efficiency classes		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book – Climate Change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Material	76
ESRS E1-9	Paragraph 69	Degree of exposure of the portfolio to climate-related opportunities			Delegated Regulation (EU) 2020/1818, Annex II		Material	76
ESRS E2-4	Paragraph 28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	Indicators number 1 and 3 Table #1 of Annex 1 Indicators number 1, 2 and 3 Table #2 of Annex 1				Non-material	-
ESRS E3-1	Paragraph 9	Water and marine resources	Indicator number 7 Table #2 of Annex 1				Non-material	-
ESRS E3-1	Paragraph 13	Dedicated policy	Indicator number 8 Table #2 of Annex 1				Non-material	-
ESRS E3-1	Paragraph 14	Sustainable oceans and seas	Indicator number 12 Table #2 of Annex 1				Non-material	-
ESRS E3-4	Paragraph 28 (c)	Total water recycled and reused	Indicator number 6.2 Table #2 of Annex 1				Non-material	-
ESRS E3-4	Paragraph 29	Total water consumption in m³ per net revenue on own operations	Indicator number 6.1 Table #2 of Annex 1				Non-material	-
ESRS 2 –IRO-1 –E4	Paragraph 16 (a) i		Indicator number 7 Table #1 of Annex 1				Non-material	-
ESRS 2 –IRO-1 –E4	Paragraph 16 (b)		Indicator number 10 Table #2 of Annex 1				Non-material	-



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS 2 –IRO-1 –E4	Paragraph 16 (c)		Indicator number 14 Table #2 of Annex 1				Non-material	-
ESRS E4-2	Paragraph 24 (b)	Sustainable land / agriculture practices or policies	Indicator number 11 Table #2 of Annex 1				Non-material	-
ESRS E4-2	Paragraph 24 (c)	Sustainable oceans / seas practices or policies	Indicator number 12 Table #2 of Annex 1				Non-material	-
ESRS E4-2	Paragraph 24 (d)	Policies to address deforestation	Indicator number 15 Table #2 of Annex 1				Non-material	-
ESRS E5-5	Paragraph 37 (d)	Non-recycled waste	Indicator number 13 Table #2 of Annex 1				Non-material	-
ESRS E5-5	Paragraph 39	Hazardous waste and radioactive waste	Indicator number 9 Table #1 of Annex 1				Non-material	-
ESRS 2 –SBM-3 –S1	Paragraph 14 (f)	Risk of incidents of forced labour	Indicator number 13 Table #3 of Annex 1				Non-material	-
ESRS 2 –SBM-3 –S1	Paragraph 14 (g)	Risk of incidents of child labour	Indicator number 12 Table #3 of Annex 1				Non-material	-
ESRS S1-1	Paragraph 20	Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material	87
ESRS S1-1	Paragraph 21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			Delegated Regulation (EU) 2020/1816, Annex II		Material	87
ESRS S1-1	Paragraph 22	Processes and measures for preventing trafficking in human beings	Indicator number 11 Table #3 of Annex 1				Material	88



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS S1-1	Paragraph 23	Workplace accident prevention policy or management system	Indicator number 1 Table #3 of Annex 1				Material	88
ESRS S1-3	Paragraph 32 (c)	Grievance/complaints handling mechanisms	Indicator number 5 Table #3 of Annex 1				Material	90
ESRS S1-14	Paragraph 88 (b)	Number of fatalities and number and rate of work-related accidents	Indicator number 2 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material	100
ESRS S1-14	Paragraph 88 (e)	Number of days lost to injuries, accidents, fatalities or illness	Indicator number 3 Table #3 of Annex 1				Material	100
ESRS S1-16	Paragraph 97 (a)	Unadjusted gender pay gap	Indicator number 12 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material	100
ESRS S1-16	Paragraph 97 (b)	Excessive CEO pay ratio	Indicator number 8 Table #3 of Annex 1				Material	100
ESRS S1-17	Paragraph 103 (a)	Incidents of discrimination	Indicator number 7 Table #3 of Annex 1				Material	101
ESRS S1-17	Paragraph 104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD principles	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)		Non-material	-
ESRS 2 –SBM-3 –S2	Paragraph 11 (b)	Significant risk of child labour or forced labour in the value chain	Indicators number 12 and no. 13 Table #3 of Annex 1				Non-material	-
ESRS S2-1	Paragraph 17	Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Non-material	-
ESRS S2-1	Paragraph 18	Policies related to value chain workers	Indicators number 11 and no. 4 Table #3 of Annex 1				Non-material	-



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS S2-1	Paragraph 19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)		Non-material	-
ESRS S2-1	Paragraph 19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			Delegated Regulation (EU) 2020/1816, Annex II		Non-material	-
ESRS S2-4	Paragraph 36	Human rights issues and incidents connected to its upstream and downstream value chain	Indicator number 14 Table #3 of Annex 1				Non-material	-
ESRS S3-1	Paragraph 16	Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material	104–105
ESRS S3-1	Paragraph 17	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	105
ESRS S3-4	Paragraph 36	Human rights issues and incidents	Indicator number 14 Table #3 of Annex 1				Material	105
ESRS S4-1	Paragraph 16	Policies related to consumers and end-users	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material	107–108
ESRS S4-1	Paragraph 17	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	105
ESRS S4-4	Paragraph 35	Human rights issues and incidents	Indicator number 14 Table #3 of Annex 1				Material	105



Disclosure Requirement	Datapoint	Sustainability report	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material/ non-material	Page number
ESRS G1-1	Paragraph 10 (b)	United Nations Convention against Corruption	Indicator number 15 Table #3 of Annex 1				Non-material	-
ESRS G1-1	Paragraph 10 (d)	Protection of whistle-blowers	Indicator number 6 Table #3 of Annex 1				Material	111
ESRS G1-4	Paragraph 24 (a)	Fines for violation of anti-corruption and anti-bribery laws	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material	112
ESRS G1-4	Paragraph 24 (b)	Standards of anti-corruption and anti-bribery	Indicator number 16 Table #3 of Annex 1				Material	112



Topical standards

Disclosure requirements

ESRS 2	General disclosures	Paragraph / report	Page	Additional Information
BP-1	General basis for preparation of the sustainability statements	General basis for preparation of the sustainability report	43–44	
BP-2	Disclosures in relation to specific circumstances	Fintraffic’s sustainability plans in the medium and long term	44	
GOV-1	The role of the administrative, management and supervisory bodies	The role of the administrative, management and supervisory bodies	44	
GOV-2	Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	44–45	
GOV-3	Integration of sustainability-related performance in incentive schemes	Integration of sustainability-related performance in incentive schemes	46–47	
GOV-4	Statement on sustainability due diligence		47	Fintraffic discloses information related to its sustainability due diligence process in this report under several relevant sections.
GOV-5	Risk management and internal controls over sustainability reporting	Risk management and internal controls over sustainability reporting	47	
SBM-1	Strategy, business model(s) and value chain	Strategy, business model and value chain	53–55	
SBM-2	Interests and views of stakeholders	Interests and views of stakeholders	15, 53, 56–57, 84, 89–90, 103–104	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model	48–52, 56–57, 73–74, 84–87	
IRO-1	Description of processes to identify and assess material impacts, risks and opportunities	Description of the processes to identify and assess material impacts, risks and opportunities	47–52, 57, 74, 110	
IRO-2	Disclosure Requirements in ESRS covered by the undertaking’s sustainability statements	Disclosure Requirements in ESRS covered by the undertaking’s sustainability statements	58–66	



Environmental standards

Disclosure requirements

ESRS E1	Climate change	Paragraph / report	Page	Additional Information
ESRS 2, GOV-3	Integration of sustainability-related performance in incentive schemes	Disclosure requirement – integration of sustainability-related performance in incentive schemes	46–47, 72	
E1-1	Transition plan for climate change mitigation	Transition plan for climate change mitigation	72–73	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Olennaiset vaikutukset, riskit ja mahdollisuudet sekä niiden vuorovaikutus strategian ja liiketoimintamallin kanssa	74, 85	
ESRS, IRO-1	Description of processes to identify and assess material climate-related impacts, risks and opportunities	Description of processes to identify and assess material climate-related impacts, risks and opportunities	74–75, 85	
E1-2	Policies related to climate change mitigation and adaptation	Policies related to climate change mitigation and adaptation	74–75	
E1-3	Actions and resources in relation to climate change policies	Actions and resources in relation to climate change policies	73–74	
E1-4	Targets related to climate change mitigation and adaptation	Targets related to climate change mitigation and adaptation	76, 79–81	
E1-6	Gross Scope 1, 2, 3 and Total GHG emissions	Gross Scope 1, 2, 3 and Total GHG emissions	82	
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	76, 83	



Social standards

Disclosure requirements

ESRS S1	Own workforce	Paragraph / report	Page	Additional Information
ESRS 2, SBM-2	Interests and views of stakeholders	Interests and views of stakeholders	54, 56–57, 84, 89–90, 102–103	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model	84–87	
S1-1	Policies related to own workforce	Policies related to own workforce	87–89	
S1-2	Processes for engaging with own workers and workers’ representatives about impacts	Processes for engaging with own workers and workers’ representatives about impacts	89–90	
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Processes to remediate negative impacts and channels for own workers to raise concerns	90	
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	91	
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	96, 97	
S1-6	Characteristics of the undertaking’s employees	Characteristics of the undertaking’s employees	98	
S1-8	Collective bargaining coverage and social dialogue	Collective bargaining coverage and social dialogue	99	
S1-9	Diversity metrics	Diversity metrics	99	
S1-10	Adequate wages	Adequate wages	99	
S1-13	Training and skills development metrics	Training and skills development metrics	99	
S1-14	Health and safety metrics	Health and safety metrics	100	
S1-15	Work-life balance metrics	Work-life balance metrics	100	
S1-16	Compensation metrics (pay gap and total compensation)	Compensation metrics (pay gap and total compensation)	100	
S1-17	Incidents, complaints and severe human rights impacts	Incidents, complaints and severe human rights impacts	101	



ESRS S3	Affected communities	Paragraph / report	Page	Additional Information
ESRS 2, SBM-2	Interests and views of stakeholders	Interests and views of stakeholders; Policies related to affected communities	53, 56–57, 103–104	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Affected communities	102–104, 106	
S3-1	Policies related to affected communities	Policies related to affected communities	103–104	
S3-2	Processes for engaging with affected communities about impacts	Processes for engaging with affected communities about impacts	105	
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Processes to remediate negative impacts and channels for affected communities to raise concerns	105	
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Taking action on material impacts on affected communities, and approaches to managing material risks related to affected communities	105–106	
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	106	
ESRS S4	Consumers and end-users	Paragraph / report	Page	Additional Information
ESRS 2, SBM-2	Interests and views of stakeholders	Interests and views of stakeholders; Policies related to affected communities	53, 107–108	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Consumers and end-users	107–109	
S4-1	Policies related to consumers and end-users	Policies related to consumers and end-users	107–108	
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Administrative standards

Disclosure requirements

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E1 Climate change

Disclosure requirement – integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)

Traffic Management Company Fintraffic Ltd adheres to the management remuneration policy approved by the company's Board of Directors and the State's ownership steering recommendations, such as the opinion on executive remuneration in state-owned companies contained in the Government Resolution on State-ownership Policy issued in 2024 and the Corporate Governance Code of 2020 as applicable.

According to the Resolution on State-ownership Policy, Fintraffic must integrate sustainability into the remuneration scheme, including executive remuneration. Remuneration must take into account the sustainability objectives material for business operations. Sustainability and responsibility is taken into consideration in the target setting of the management and in the performance bonus scheme in terms of safety, the environment, corporate social responsibility and good governance.

The management's sustainability targets set for 2024 are reaching CSRD maturity, financial efficiency and employee satisfaction. The actual climate-related considerations or emission reduction targets tied to them, performance or the impact of the aforementioned considerations as a percentage of the executive remuneration were not further detailed in 2024.

Strategy Transition plan for climate change mitigation (E1-1)

The operating environment of the transport sector is changing. The sector is driven by megatrends, such as climate change, biodiversity loss, urbanisation and the related increase in public transport. Trends slowing down and preventing the deterioration of the state of the environment include the low-carbon and carbon-neutrality targets of states and undertakings, the growth of pedestrian and bicycle traffic, improving the fuel efficiency of vehicles, the efficiency and ecosystem thinking of transport system logistics, abandoning fossil fuels and new forms of energy in transport and construction.

To guide the above-mentioned megatrends, international and national environmental regulations, agreements and programmes have been created that directly or indirectly affect the transport system's – including Fintraffic's – business environment. Fintraffic's goal is to improve the level of protection of



its own environment in business operations, meet its own binding obligations and achieve its environmental targets related to, among other things, the prevention of environmental pollution, the protection of the natural environment, the sustainable use of resources, the green transition and climate change mitigation and adaptation in its own activities. Fintraffic uses its own traffic control operations to support and promote the environmental targets of its stakeholders and, in general, broader societal and environmental principles, such as sustainable development.

Fintraffic's concrete environmental action has been divided into two sections: managing the environmental impact of the company's own business and value chain, and the impact of Fintraffic's traffic control operations on emissions across the entire transport system.

Fintraffic is a service business company with marginal exposure to coal, oil and gas-related activities. Fintraffic's business operations do not include any key assets or products that would generate locked-in of GHG emissions and thus jeopardise the achievement of its own GHG emission reduction targets. The taxonomy alignment and eligibility reporting will be promoted during 2025. Fintraffic's own environmental impact related to GHG emissions is mostly reflected in procurement and its value chains. Procurement accounts for 98% of the GHG

emissions generated by the company (Table 4). In 2024, Fintraffic launched a more extensive study on the emissions impact of procurements (purchased services and products). The study will continue in 2025. The aim is to use the inventory to determine the most significant emission reduction targets (financial, strategic, potential), to plan effective reduction measures for significant emission reduction targets, and to plan a more detailed, short, medium and long-term transition plan towards low-carbon procurement in relation to major purchases.

Direct Scope 1 emissions and indirect Scope 2 emissions accounted for about 2 % of Fintraffic's total GHG emissions in 2024. Fintraffic has been determinedly reducing its dependence on electricity and heat generated from fossil sources since 2019. Approximately 97 % of the purchased electricity is currently fossil-free (electricity generated from renewable and nuclear sources). Fintraffic aims to switch to using biofuels or electricity in its own energy production (emergency power units) and the vehicle fleet under its own control by 2030. In total, the GHG emissions from all categories have reduced by 61 % (Table 1) from 2019 to 2023.

Fintraffic is committed to the Finnish government's carbon neutrality target through reducing the significant Scope 1 and 2 GHG emissions caused by its own activities to zero by the end of 2030. It also

aims to achieve full carbon neutrality in key procurement by 2035. Full carbon neutrality in all Fintraffic's operations – including emissions from the value chain – will be achieved by 2050 at the latest. Fintraffic's goal is in line with the Paris Agreement's goal of limiting global warming to 1.5 degrees. Fintraffic has defined a transition plan for emission reductions in accordance with the SBTi's cross-sector emission pathway in line with the Paris Agreement (Table 2). In its own reduction targets, Fintraffic also takes account of the Finnish Government's carbon neutrality target when specifying the GHG emission transition plan from 2025 onwards. Table 1 describes the Scope 1, 2 and 3 reduction targets and measures for 2030, 2035 and 2050.

The transition plan to low carbon, its updates and implementation are presented and approved annually by the Group Management Team. After the plan has been approved, the transition plan for emission reductions is integrated into the companies' business strategies and financing plans. Subsidiary-specific low-carbon roadmap measures are decided, implemented and monitored by company at the business level. The identification of financial materiality will be specified in 2025 in relation to the company's own GHG emission reduction targets and measures and carbon handprint.

In addition to carbon neutrality, Fintraffic's environmental responsibility also includes energy

and material efficiency, and environmentally safe and efficient traffic. Fintraffic's business operations promote the climate change prevention work of stakeholders at the transport system level by providing traffic control services to optimise the entire transport system and improve environmental efficiency. In addition to reducing its own carbon footprint, Fintraffic aims to increase its handprint by developing and improving its own traffic control functions and by developing new digital services for stakeholders.

With the help of traffic control to prevent traffic congestion and efficient use of the Finnish airspace, Fintraffic can contribute to reducing transport emissions and noise pollution. Fintraffic produces traffic information and digital services for customers and partners. By producing data and providing digital services, Fintraffic can streamline travel and logistics chains and prevent environmental damage and accidents. New solutions can also ease congestion and resolve incidents and help reduce traffic infrastructure management costs.



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

Fintraffic has regularly surveyed the risks and opportunities related to climate change since 2021. The environmental risk assessment is based on the TCFD framework. The impacts, risks and opportunities arising from climate change for Fintraffic’s business operations are identified, assessed and managed through Fintraffic’s risk process on an annual basis. Fintraffic’s modes of transport participate in the mapping process facilitated by the environmental and communication entities. The annually conducted Fintraffic’s GHG inventory, describing the emissions impact of its own business on climate change (environmental impact), serves as basic information for risk analysis. The risk assessment identifies material physical and transition risks in Fintraffic’s own operations and upstream and downstream of the value chain (including traffic control, traffic data, procurement). The background information used for the mapping include the IPCC RCP scenarios RCP1.9–8.5 for greenhouse gas emissions.

Fintraffic’s business operations have been assessed at a rough level against climate scenarios and their outcomes (such as the rise in temperature and sea level in Finland in different scenarios). Based on climate scenarios, the physical and transition risks have been assessed as short-term (1 year),

medium-term (1–5 years) and long-term (more than five years) impacts on Fintraffic’s business. Business resilience and the means for managing the impacts, risks and opportunities caused by climate change are identified in connection with the risk process. In addition, the financial effects of impacts, risks and opportunities on Fintraffic’s business operations were earlier non-numerically assessed as part of the process of identifying climate risks. Previous risk assessments have failed to identify with sufficient accuracy risks or opportunities beyond the starting point of financial materiality assessment that affect or can reasonably be expected to affect Fintraffic’s financial position, financial performance, cash flows, access to finance or capital costs in the short, medium or long term and that are material for sustainability reporting. Resilience analysis will be developed in the future, in particular, so as to better identify the interactions of the material impacts, risks and opportunities with Fintraffic’s strategy and business model.

In connection with the update of Fintraffic’s sustainability work, a double materiality analysis of material impacts, risks and opportunities was carried out in 2024. At the same time, the interaction of impacts, risks and opportunities with the strategy and business model was assessed. Pages 48–52 present Fintraffic’s financial risks and opportunities related to sustainability resulting from climate change. It should be noted that Fintraffic’s own risk assessment

also compiles the risks that, based on the latest double materiality analysis, did not emerge as material risks in Fintraffic’s business operations.

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

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

Fintraffic’s vision is to produce the most environmentally friendly traffic and traffic management in the world. The aim is to be a forerunner in environmentally friendly traffic management. In its environmental action, Fintraffic aims to promote sustainable development in its own and external stakeholders’ business operations. Fintraffic’s concrete environmental action is divided into two parts: managing the environmental impact of its own business and value chain and influencing emissions across the entire transport system.

Fintraffic’s operating policies concern climate change mitigation and adaptation as well as energy efficiency. Fintraffic is committed to the Finnish government’s carbon neutrality target through reducing significant GHG emissions caused by its own activities to zero by 2035. The carbon neutrality target is in line with the Paris Agreement target to limit the global average temperature increase to

Area	2019, t CO ₂ e	2024, t CO ₂ e	Change %
Scope 1	114	178	56
Scope 2	40,450	125	-99
Scope 3	33,480	28,923	-14
Total	74,044	29,227	-61

Table 1. Fintraffic’s carbon footprint in 2024 was 29,227 t CO₂eq. Since 2019, Fintraffic has reduced the share of electricity produced from fossil sources by almost 100 per cent.

below 1.5°C. The EU (and Fintraffic) aim to achieve full carbon neutrality by 2050.

Fintraffic’s operating culture is based on the principle of sustainable development. The comprehensive concept of sustainable development is divided into ecological, financial, social and cultural sustainability. Fintraffic is committed to promoting the principle of ecological sustainability in its own environmental activities, i.e. the preservation of biodiversity, sustainable use of energy and natural resources, adjusting the environmental load to carrying capacity of nature, a sustainable material economy and slowing down climate change.

The operating principles related to climate change mitigation and adaptation are described in Fintraffic’s environmental management system manual.



Fintraffic's Carbon Reduction Roadmap 2024–2050

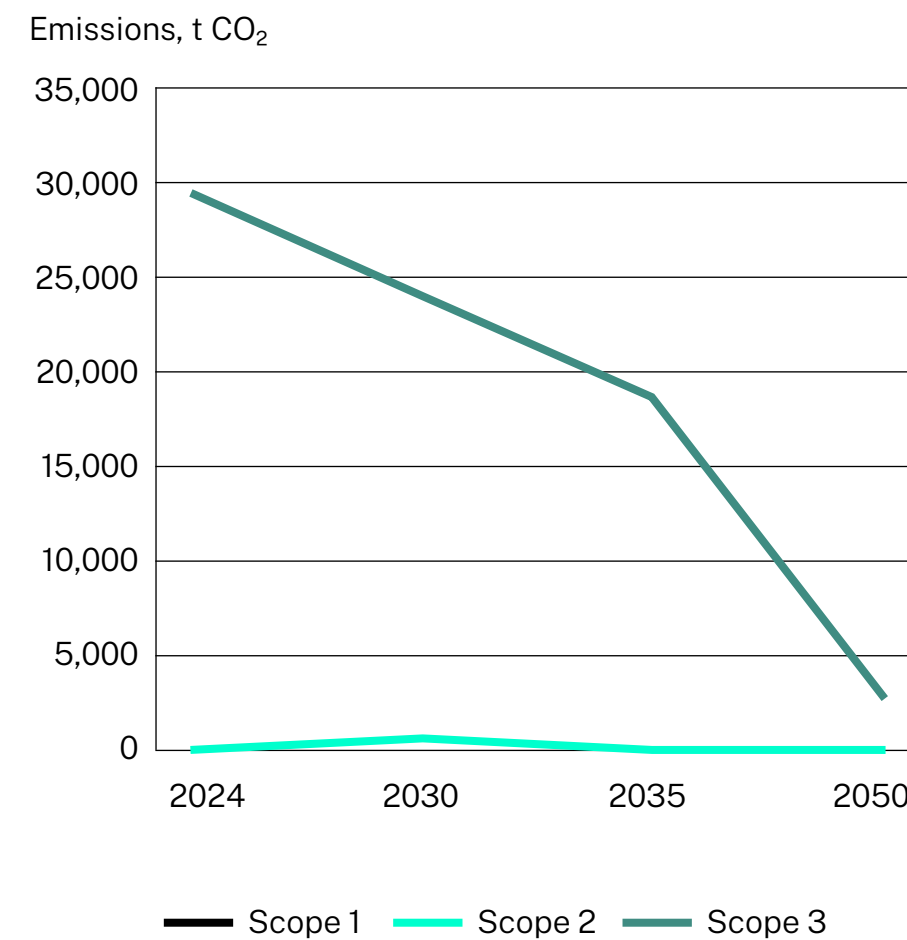


Figure 2. Fintraffic's Carbon Reduction Roadmap until 2050 Scope 1 GHG emissions can be brought to zero by 2030 by planned measures. The pathway to reducing Scope 3 emissions will be specified at the end of 2025. Procurement forms the most significant part of Fintraffic's carbon footprint. In work towards carbon neutrality, the greatest impact will be achieved by investing in low-carbon measures related to purchased products and services.

The annual carbon emission report and the related instructions for measures describe concrete measures for managing Fintraffic's own GHG emissions, GHG removals and transition risks at different time intervals in the Group's own operations and/or upstream and downstream in its value chain.

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

Fintraffic's goal is to reduce/remove the most significant direct and indirect GHG emissions from its own business by 2035. Carbon neutrality in Scope 1 and 2 emissions will be achieved in 2025–2030. Carbon neutrality in Scope 3 emissions will be achieved by 2035. Fintraffic aims to switch using fossil-free sources for all purchased electricity and district heat (Scope 2) by 2030. Carbon neutrality in Scope 1 emissions will be achieved through such actions as switching to bio-based fuels in production cars and emergency power units and electrifying the vehicle fleet controlled by Fintraffic by 2030. As a typical service business company, Fintraffic's most significant emissions come from procurement. The purchased products and services and fixed assets in Scope 3 category cover more than 98 per cent of all

Fintraffic emissions. Fintraffic aims to make its key procurements low carbon by 2035. Key procurements will be identified by means of a procurement inventory in 2025. Based on the inventory, concrete low-carbon measures and a more detailed schedule for the coming years will also be specified.



Anticipated financial effects from material physical and transition risks and potential climate-related opportunities (E1-9)

Fintraffic’s business operations are not significantly fossil-dependent, and the business model is not based on carbon intensity. As a typical service business, Fintraffic’s most significant GHG emissions come from procurement and their value chains. Own direct emissions from energy production and indirect emissions from purchased electricity have currently been converted into fossil-free emissions to almost 100%. The negative GHG emission impact on climate change from own business and fossil dependency are being continuously reduced by planned and implemented actions.

Currently, there is no commonly accepted methodology to assess or measure how material physical risks and transition risks may affect Fintraffic’s future financial position, financial, performance and cash flows. It is very likely that Fintraffic’s activities are less probable to become financially exposed to climate-related physical and transition risks than those of, for example, Fintraffic’s external stakeholders. The probability of actual risk exposure will be further reduced by the long-term time horizon of the materialisation of the impacts of climate change and, in particular, Fintraffic’s own emission reduction measures to eliminate the materialisation of

potential transition risks. Fintraffic is transitioning to fossil-free energy and fuels in a controlled manner and continues its long-term efforts to shift to low-carbon procurement. This will reduce the additional financial costs arising from the risk of increased energy costs more than what the additional business costs resulting from the impact of increased energy prices caused by a potential green transition might generate. It is difficult for Fintraffic to use demand side response in its own energy consumption, as the company’s energy demand is inflexible. By means of correctly directed real estate strategy, new sources of energy and effective energy efficiency measures, Fintraffic can increase its own demand response and improve its resilience.

Temperature rise, extreme weather events (e.g. storms, floods, rainfall, drought) and sea level rise are directly linked to the acute and chronic effects of global warming. Transition risks are risks arising from the transition of society towards a more sustainable and low-carbon economy. Taking into account the essential physical risks and transition risks related to Fintraffic’s business operations, the financial impact of the risks is not expected to be significant for Fintraffic. The physical risks caused by climate change are related to damage to traffic control buildings and equipment caused by extreme weather events (storms, floods, rainfall). An increase in the highest temperatures may have an impact on

increasing the need for cooling in work and technical spaces. The materialisation of any acute physical risks affects only a limited geographical area. Furthermore, any deviation caused by extreme weather events is unlikely to have more than a short-term impact on traffic control in the Finnish national area. Physical risks can damage Fintraffic’s infrastructure in a limited scale, in the short term and at low probability. The financial impact of the materialisation of risks is difficult to assess, as Fintraffic’s resilience to partial or complete breakdown of individual buildings or equipment is very good – traffic control would remain normal despite the exceptional situation. In case of physical risks caused by climate change, bigger financial impacts are likely to affect the business operations of external stakeholders in the long term.

In the future, extreme weather events may also involve various problems related to energy supply. Power cuts caused by physical breakdowns and regulatory and restrictive measures resulting from them may have negative financial impacts on Fintraffic. Even in these cases, it is difficult to quantify the financial impact, as Fintraffic prepares for power cuts with various backup measures. Proactive maintenance of buildings and equipment (stormwater and cooling) and energy efficiency measures can increase the resilience of infrastructure against potential negative impacts of climate change.

Of potential transition risks facing Fintraffic, in general, they could include different regulatory risks, such as tightened energy, climate and environmental regulation, as well as an increase in the general cost level of energy, insurance and investments. It is difficult to assess the financial impact of likely changes in Fintraffic’s business environment in the long term. The refinement of the assessment will continue in 2025.

Fintraffic enables external stakeholders (transport systems) to mitigate and adapt to climate change through its own traffic management service. Up-to-date traffic data and traffic control services provided by Fintraffic increase traffic efficiency by reducing fuel consumption and thus also emissions (air route efficiency, NEMO and other benefits of digitalisation). In addition, new information management solutions improve the management of incidents and congestion, which reduces emissions at the traffic system level.



Scope 1 and 2 emissions								Scope 3 emissions							
	Base year (2024)	2030 target	Refer- ence	2035 target	Refer- ence	2050 target	Reference: cross-sector emission pathway reference values		Base year (2024)	2030 target	Refer- ence	2035 target	Refer- ence	2050 target	Reference: cross-sector emission pathway reference values
GHG emissions (kt CO ₂ eq)	303	0	-42	0		0	-10	GHG emissions (kt CO ₂ eq)	28,923	23,717	-20	18,511	-20	2,892	-10
Fuel switching	178	0		0		0		Energy efficiency and consumption reduction							
Electrification	0	0		0		0		Material efficiency and consumption reduction							
Use of fossil-free energy	125	0		0		0		Switching the energy source							
Absolute reduction in Scope 1 GHG emissions	178	178		0		0		Electrification							
Percentage of Scope 1 emissions of GHG emission reductions (in relation to base year emissions)	100	100		0		0		Use of renewable/fossil-free energy							
Intensity value of Scope 1 GHG emission reductions	0,7	0		0		0		Phased removal, replacement, or modification of a product							
Absolute reduction in location-based Scope 2 GHG emissions	1,801	1 801		0		0		Phased removal, replacement, or modification of a process							
Percentage of Scope 2 GHG emissions of GHG emission reductions (in relation to base year emissions)	100	100		0		0		Absolute reduction in Scope 3 GHG emissions	0	5,206		5,206		15,619	
Intensity value of location-based Scope 2 GHG emission reductions	7,1	0		0		0		Percentage of Scope 3 emissions of GHG emission reductions (in relation to base year emissions)	100	-20		-20		-10	
Absolute reduction in market-based Scope 2 GHG emissions	125	125		0		0		Intensity value of Scope 3 GHG emission reductions	114.10	93.50		73		11	
Percentage of market-based Scope 2 reductions of GHG emissions (in relation to base year emissions)	100	100		0		0									

Table 3.



Methodology for calculating GHG emissions

GHG emissions include emissions from all Fintraffic companies' business activities during the reporting year. GHG emissions are calculated using the GHG Protocol Corporate Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The scope of reporting is based on operational control. The reporting covers direct GHG emissions (Scope 1) from operations owned by Fintraffic, indirect GHG emissions (Scope 2) from the production of purchased energy and indirect GHG emissions from the rest of the value chain (Scope 3), including upstream and downstream emissions as applicable. As of 2024 (the base year), Scope 3 greenhouse gas emissions related to significant emission sources will be reported with greater detail than in previous years.

The calculation includes all greenhouse gases covered by the GHG protocol (CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃) to the extent that emission factors for all greenhouse gases are available for the emission source. Emissions are converted into carbon dioxide equivalents. The equivalent figure has been used if it has been available. The data from previous years will be corrected and updated, if necessary, to cover all greenhouse gases retroactively if only CO₂ emissions have been previously included in the

calculation and potential adjustments to the emission factors make this possible.

Scope 1 emissions have been calculated from the fuels used by emergency power units and vehicle fleet in Fintraffic's control. The calculation is based on supplier-specific emission factors for fuels or on emission factors used in national statistics.

Scope 2 emissions are calculated from all energy consumption generated by the purchased electricity used by the electricity systems of Fintraffic's premises and transport systems. District heating emissions are calculated for all owned and leased premises. For leased properties, Scope 2 emissions from electricity and heat consumption are reported under Scope 3, category C8: leased assets.

Two methods are used to calculate Scope 2 CO₂ emissions. The market-based methodology uses producer-specific emission factors, complemented by national emission factors for residual electricity mix for untraceable purchased electricity. The location-based methodology uses country-specific average emission factors for electricity consumed. The residual mix factors and country-specific factors have been taken from the Open CO₂ service.

The significance of each of the 15 Scope 3 categories was determined by means of a spend-based materiality analysis (Hansel). All categories identified as material (value in euro,

strategic meaning, emission potential) were calculated. The Scope 3 inventory also included categories where the amount of GHG was not significant. The categories included in the calculation are listed in the table on page 82.

Scope 1

Scope 1 GHG emissions decreased by 6% between 2023 and 2024. The most important reason for reduced emissions was the electrification of leased cars and the switch to bio-based fuels for emergency power units.

The company aims to switch to using fossil-free fuels in its own premises and leased cars by 2030. In leased premises, district heating is already produced from renewable sources.

Scope 2

Location-based scope 2 emissions remained the same level from 2023 to 2024. The main reason for the increase is the increased use of fossil fuels in electricity production at the national level.

Market-based Scope 2 emissions are almost 100% zero, as most of the purchased electricity is procured as fossil-free electricity in accordance with the Hansel agreement.

District heating for Fintraffic's own properties is currently based on mixed-source production. The goal is to transition to fossil-free heat sources within the next few

years. For Fintraffic's leased premises, district heating is already produced using renewable energy sources in several locations.

In 2024, 32 tonnes of emissions were generated from the purchase of district heating.

Scope 2 emissions decreased by 65% compared to the previous year. The magnitude of this change is due to a technical adjustment in reporting. Previously, electricity and heat used in leased premises were reported under Scope 2 emissions. As of 2024, these emissions are reported under Scope 3, category C8.

Scope 3

Scope 3 GHG emissions increased 16% in 2024 compared to the previous year. The change was caused by increases in fixed assets (for example, office project in the Helsinki metropolitan area). The calculation of Scope 3 emissions will be specified during 2025 as the emission inventory develops.



Targets related to climate change mitigation and adaptation

Theme	2025 target	2030–2035 target	Key actions
Carbon neutrality by 2024–2030 (Scope 1 and 2). Elimination/reduction of emissions	Purchased electricity and district heating 99.9% fossil-free.	Own energy production and vehicles under own control have switched to biodiesel or been electrified (2030).	Amending energy contracts, acquiring a guarantee of origin, switching fuel, EV leasing.
Low-carbon procurement and environmental impacts (Scope 3 covers more than 90% of all emissions).	Promoting low-carbon solutions in key procurement*. A procurement inventory has been initiated, an analysis and synthesis have been made; low-carbon measures have been planned for the most significant procurements by decision of the modes of transport.	Key procurements are low-carbon (2035).	Procurement review (value chain dimension), analysis, presentation of results to business operations, targeting of measures to key procurements through business decisions, development and monitoring of measurement, minimum sustainability requirements for procurements by category, amendment of contracts, training of procurement personnel.

Table 4. Fintraffic’s targets related to climate change mitigation and adaptation.



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

The table refers to AR 31.

Scope 1 and 2 emissions	Base year (2024)	2030 target	Refer- ence	2035 target	Refer- ence	2050 target	Reference: cross-sector emission pathway reference values
GHG emissions (ktCO ₂ eq)	303	303	-42		-90		
Energy efficiency and consumption reduction	0	0					
Material efficiency and consumption reduction	0	0					
Switching energy source	0	0					
Electrification	0	0					
Switching fuel	178	178					
Use of renewable energy	125	125					
Phased removal, replacement, or modification of a product	0	0					
Phased removal, replacement, or modification of a process	0	0					
Absolute reduction in Scope 1 GHG emissions	178	178					
Percentage of Scope 1 emissions of GHG emission reductions (in relation to base year emissions)	100	100					

Scope 1 and 2 emissions	Base year (2024)	2030 target	Refer- ence	2035 target	Refer- ence	2050 target	Reference: cross-sector emission pathway reference values
Intensity value of Scope 1 GHG emission reductions	0.7	0					
Absolute reduction in location-based Scope 2 GHG emissions	1,801	1,801					
Percentage of Scope 2 GHG emissions of GHG emission reductions (in relation to base year emissions)	100	100					
Intensity value of location-based Scope 2 GHG emission reductions	7.1	7.1					
Absolute reduction in market-based Scope 2 GHG emissions	125	125					
Percentage of market-based Scope 2 reductions of GHG emissions (in relation to base year emissions)	100	100					

Table 5. Targets related to climate change mitigation and adaptation at Fintraffic in 2025–2035.



The table refers to AR 31.

Scope 3 emissions	Base year (2024)	2030 target	Refer- ence	2035 target	Refer- ence	2050 target	Reference: cross-sector emission pathway reference values
GHG emissions (ktCO ₂ eq)	28,923	23,717	-20	18,511	-20	2,892	
Energy efficiency and consumption reduction		-		-			
Material efficiency and consumption reduction		-		-			
Switching energy source		-		-			
Electrification		-		-			
Use of renewable energy		-		-			
Phased removal, replacement, or modification of a product		-		-			
Phased removal, replacement, or modification of a process		-		-			
Absolute reduction in Scope 3 GHG emissions	28,923	5,206		5,206			
Percentage of Scope 3 emissions of GHG emission reductions (in relation to base year emissions)	100	-20			-20	-10	
Intensity value of Scope 3 GHG emission reductions	114.10	93.50		73		11	

Table 5. Actions related to climate change mitigation and adaptation at Fintraffic in 2025–2035. Actions and the transition plan for reducing Scope 3 emissions will be clarified over the course of 2025.



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

The table refers to AR 48.

Scope 1 GHG emissions	Base year (2024)	Compar- ative (2023)	N	% N / N-1	2030	-2050	Annual % target / base year
Gross Scope 1 GHG emissions (tCO ₂ eq)	178 tCO ₂ eq	110 tCO ₂ eq	178 tCO ₂ eq	62%	0 tCO ₂ eq	0 tCO ₂ eq	20%
Percentage of Scope 1 GHG emissions in regulated emissions trading schemes (%)	0%	0%	0%	0%	0%	0%	0%
Scope 2 GHG emissions							
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	1,801 tCO ₂ eq	1,861 tCO ₂ eq	1,801 tCO ₂ eq	3%	0 tCO ₂ eq	0 tCO ₂ eq	20%
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	125 tCO ₂ eq	355 tCO ₂ eq	125 tCO ₂ eq	-65%	0 tCO ₂ eq	0 tCO ₂ eq	20%
Significant Scope 3 GHG emissions (select material categories)							
Total gross indirect (Scope 3) GHG emissions (tCO ₂ eq)	28,923 tCO ₂ eq	24,813 tCO ₂ eq	28,923 tCO ₂ eq	17%	23,717 tCO ₂ eq	2,892 tCO ₂ eq	4%
1 Purchased goods and services	27,049 tCO ₂ eq	23,532 tCO ₂ eq	27,049 tCO ₂ eq	15%	22,180 tCO ₂ eq	2,705 tCO ₂ eq	4%
[Optional subcategory: Cloud computing and data centre services]	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%
2 Capital goods	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%
3 Fuel and energy-related activities (not included in scope1 or 2)	512 tCO ₂ eq	34 tCO ₂ eq	512 tCO ₂ eq	1,405%	0 tCO ₂ eq	0 tCO ₂ eq	20%
4 Upstream transportation and distribution	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0 %	0 tCO ₂ eq	0 tCO ₂ eq	0%
5 Waste generated in operations	10 tCO ₂ eq	57 tCO ₂ eq	10 tCO ₂ eq	-82%	0 tCO ₂ eq	0 tCO ₂ eq	4%

6 Business travelling	632 tCO ₂ eq	588 tCO ₂ eq	632 tCO ₂ eq	7%	0 tCO ₂ eq	0 tCO ₂ eq	4%
7 Employee commuting	602 tCO ₂ eq	602 tCO ₂ eq	602 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	4%
8 Upstream leased assets	118 tCO ₂ eq	0 tCO ₂ eq	118 tCO ₂ eq	100%	0 tCO ₂ eq	0 tCO ₂ eq	4%
9 Downstream transportation	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%
10 Processing of sold products	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%
11 Use of sold products	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%
12 End-of-life treatment of sold products	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%
13 Downstream leased assets	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%
14 Franchises	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%
15 Investments	0 tCO ₂ eq	0 tCO ₂ eq	0 tCO ₂ eq	0%	0 tCO ₂ eq	0 tCO ₂ eq	0%

Total GHG emissions							
Total GHG emissions (location-based) (tCO ₂ eq)	30,902 tCO ₂ eq	29,227 tCO ₂ eq	30,902 tCO ₂ eq	6%	0 tCO ₂ eq	0 tCO ₂ eq	4%
Total GHG emissions (market-based) (tCO ₂ eq)	29,227 tCO ₂ eq	26,784 tCO ₂ eq	29,227 tCO ₂ eq	9%	0 tCO ₂ eq	0 tCO ₂ eq	4%
Biogenic emissions	252 tCO ₂ eq						



The table refers to AR 54.

GHG intensity per net revenue	Comparative	N	% N / N-1
Total GHG emissions (location-based) per net revenue (tCO ₂ eq/monetary unit)	127.6	121.9	-5
Total GHG emissions (market-based) per net revenue (tCO ₂ eq/monetary unit)	120.7	115.2	-5

The table refers to AR 55.

Net revenue used to calculate GHG intensity	253.6
Net revenue (other)	0
Net revenue, total (in the financial statements)	253.6

Fintraffic’s services streamline travel and transport chains, thus promoting multimodal transport and the development of new services. Successful facilitation of multimodal traffic may provide Fintraffic with business opportunities. Low-carbon traffic also changes the traffic ecosystem (e.g. the impacts of charging times on land and maritime transport, new kind of needs to steer and organise transport, need for new kind of information). If Fintraffic succeeds in delivering the change, it may become a more attractive collaborator for its partners.

The financial effects of the impacts, risks and opportunities on Fintraffic’s business can currently be assessed in verbal terms. Assessing them numerically includes many uncertainties related to matters like different climate scenarios and the long time span of possible outcomes. Furthermore, the transport system is composed of many different actors whose individual emission reduction impacts are challenging to separate quantitatively from the system as a whole. Similarly, it is difficult to quantify the opportunities generated by climate change for Fintraffic’s business activities in numerical terms. A verbal description of the impact of Fintraffic’s own activities may be the only reasonable way to describe the state of the matter in this case as well. The quantification of financial impacts, risks and opportunities will continue as a concrete action at Fintraffic.

Pages 48–52 present the impacts, risks and opportunities of the double materiality analysis (2024) is presented at the beginning of the section on environmental information. The table also describes the estimated financial effects of the opportunities as a numerical category.



S1 Own workforce

Interests and views of stakeholders (SBM-2)

The interests, views and rights of Fintraffic's own workforce are taken into account in the company's strategy and business model, so that employees' views are heard through several different forums. As Fintraffic only has operations in Finland, the implementation of employees' rights is guaranteed through legislation of relative high international standard.

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

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

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

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

In accordance with Finnish labour law practice, Fintraffic's own workforce is considered to include Fintraffic's contractual employees as well as CEOs working under an executive employment contract who, according to Finnish labour law practice, are not employees. Fintraffic only occasionally employs private traders, such as freelancers who produce content. Temporary agency workers working directly under Fintraffic's supervision are used in a very limited scale. At the time of reporting, the number of such persons was 32. There are also consultants employed by other companies working in different projects. At the time of reporting, there were 547 such persons who also partly work for other customers. These persons are not included in Fintraffic's own



workforce. In the double materiality analysis, the impacts have been considered to affect Fintraffic's own workforce, i.e. contracted employees.

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

Negative impacts

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

As part of the double materiality analysis, the negative impacts related to occupational safety and health have been assessed as a material topic for Fintraffic. As we provide traffic control services around the clock, more than 66 per cent of our personnel do shift work. Especially night work involves identified stress factors that are managed by means of shift planning and by providing personnel with training on, for example, the importance of sufficient sleep and healthy lifestyles.

Positive impacts

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

In 2023, the most critical shared strategic competences were developed with transport modes. In spring 2024, a C&Q competence survey was procured to map the competences at Fintraffic. For those working as experts, the survey and system were tested as part of a pilot project. In late autumn 2024 and early 2025, the survey will be expanded to all those working in expert roles. After this, the competences of those working in traffic control will be mapped.

As part of the double materiality analysis, promoting an equal work community has been assessed as a positive impact on Fintraffic's own

workforce. Fintraffic wants to promote non-discrimination and equality among its own workforce. An equal work community that takes into account inclusion, fair opportunities for advancement and adequate compensation promote the wellbeing and motivation of employees. For two years, we have participated in the Responsible Employer campaign of Oikotie, which involves carrying out a sustainability survey among the personnel. Oikotie's survey enables comparison with other companies. In the 2024 survey, non-discrimination had improved compared to 2023 (3.34 → 3.55). The work-life balance and wellbeing section had also improved measurably (3.65 → 3.79).

As part of the double materiality analysis, the promotion of worker health and wellbeing has been assessed as a material topic for Fintraffic concerning its own workforce. Fintraffic strives to strengthen the health and wellbeing of its employees through various measures. Fintraffic has been awarded the Mental Health Friendly Workplace certificate by Mieli ry for 2022, 2023 and 2024. Fintraffic offers a significantly broader occupational health care scheme than the one required by law. It covers all Fintraffic employees regardless of the character and duration of the employment relationship. Occupational health care promotes a healthy working environment and safe working conditions. In addition to statutory preventive occupational health

care, Fintraffic offers its employees comprehensive medical care services at the level of general practitioners and specialists included in voluntary occupational health care. Workers also have access to occupational physiotherapists (including direct appointments), physiotherapists and occupational health psychologists. Short-term psychotherapy is offered with a referral from an occupational healthcare physician or occupational psychologist to those who need it. Occupational health services for Fintraffic are provided by Suomen Terveystalo Oy.

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

In 2024, Fintraffic supported the wellbeing of its personnel through exercise campaigns, comprehensive occupational health care services and Auntie, a low-threshold mental wellbeing service. The employee bike was also a popular employee benefit in 2024: more than 300 Fintraffic employees are already using one. The users of the employee bike are very satisfied with the benefit.

According to our occupational health care partner Terveystalo, we take care of monitoring sickness



absences and working capacity negotiations in a very comprehensive manner.

The wellbeing index shows a positive trend. In 2024, the wellbeing index was 94.8 per cent, compared to 94 per cent a year earlier. In 2021, the index was 86.7%. The index describes the share of people who do not experience any of the following problems: inadequate control over work, conflicts in harmonising work and other areas of life, work is not sufficiently rewarding, not enough social support at work, stress and job dissatisfaction. The wellbeing index is based on the responses to Terveystalo’s health survey.

According to the TyöOptimi wellbeing survey conducted by Terveystalo in spring 2024, 82% of the respondents at Fintraffic are doing well. In Terveystalo’s comprehensive comparison data containing more than 10,000 respondents, 66% of the respondents reported that they were doing well. in 2023, Fintraffic’s comparison figure was 77 per cent, i.e. the reported wellbeing has increased from the comparison year. Among Fintraffic personnel, 8 per cent of the respondents were exhausted or at risk of exhaustion (9 per cent in 2023), compared to 16 per cent in Terveystalo’s reference material.

Of Fintraffic personnel, 20 per cent are overweight, and most of them suffer from at least one disease associated with overweight, such as diabetes. Weight management has been identified as a work

ability risk for 22 per cent of the respondents to the health survey. We aim to address this challenge with a pioneering wellbeing project, Fit for Future Fintraffic. It is aimed at inspiring insights into permanent weight management and strengthening motivation to foster personal wellbeing with the assistance of a multiprofessional team. Employees apply to the programme and the occupational health care provider selects the participants. To help the weight management, the participants will also be prescribed weight management medication, which is used under the guidance of an occupational health physician. The initial results of the programme are excellent.

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

Risks, opportunities and dependencies

As part of the double materiality analysis, the following topics have been assessed as material risks for Fintraffic: risks caused by workers’ skills gaps, availability of skilled labour and industrial action. The risks concern the entire personnel and are geographically limited to Finland, where all Fintraffic operations take place. Fintraffic’s operations consist of the sale of expert services, which means that the operations are entirely dependent on expert personnel. This means training those already employed and taking care of their expertise as well as

the company’s ability to recruit people with the necessary skills from the labour market.

The risk related to industrial action is also associated with the provision of expert services. Traffic control management services are provided every day of the year and in all seasons. If Fintraffic personnel are not at work, this means significant restrictions on traffic and logistics. A high degree of organisation also means better opportunities for trade unions to organise industrial action.

As an opportunity, the double materiality analysis considered a strong and attractive employer image. Fintraffic is currently working on a project to develop corporate culture that aims to strengthen the corporate culture and facilitate communication about it. Most of Fintraffic’s employees feel that they are doing meaningful work. These factors are considered to provide Fintraffic with opportunities regarding its own workforce.

Impacts related to transition plans

Typical of an expert organisation engaged in service business, the GHG emissions caused by Fintraffic’s own business operations are mainly related to procurement. Fintraffic’s fossil dependency is already low. The purchased energy is mostly from fossil-free sources. Fintraffic’s efforts to turn its own business operations low carbon by 2035 are not expected to have any personnel reduction impacts,

through structural reforms, for example. In the future, transitioning away from fossil fuels may cause changes between different modes of transport at the traffic system level. The impact on Fintraffic’s service offering and possible impacts on personnel needs cannot be assessed at the moment.

As technologies keep on developing, the increased degree of the automation of work reduces the need for operational traffic control performed by humans. This may have an impact on the amount of operational work available. To some extent, this is already reflected in the fact that the number of people performing purely operational traffic control has decreased and the number of people engaged in expert work has increased. In other words, automation development may affect negatively people performing traffic control work. On the other hand, increasing automation in manual work may mean more meaningful and versatile tasks. In the future, the development of artificial intelligence may also have a strong impact on office and expert work, but changes cannot be reliably assessed at the time of reporting.

To prepare for the changes, Fintraffic is currently conducting a survey of the strategic competences, which examines the level of employees’ competence in relation to the competence critical for the implementation of the strategy. When the survey has been completed, training can be better targeted to



employees who need it. Thus, potential harmful impacts on employees may be prevented. The resources used to manage this impact are the new software that has already been acquired for the competence survey and the working hours contributed by the HR department and experts and supervisors who participated in the specification work.

Policies related to own workforce (S1-1)

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

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

The policies cover Fintraffic's entire workforce.

Human rights policy commitments

In accordance with our sustainability policy, respect for human rights is a key principle in Fintraffic's operations. We are committed to supporting the UN Global Compact's Action Plan and its principles relating to the environment, labour, human rights,

and anti-bribery and anti-corruption activities. Fintraffic is also involved in promoting the UN Sustainable Development Goals. We respect the key human rights declarations, such as the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, including freedom of association and effective recognition of the right to collective bargaining, the elimination of all forms of forced labour, the effective prohibition of child labour and the elimination of discrimination in the labour market. Fintraffic is also committed to respecting employees' labour rights as a member of Service Sector Employers Palta.

In practice, Fintraffic's policies correspond to the UN Guiding Principles on the corporate responsibility for human rights. As the company's activities have not been considered to involve significant human rights risks, Fintraffic has not yet implemented all the formal processes required by the UN principles on business and human rights. In the future, human rights impact assessment procedures will be included in the company's general risk assessment, and the UN principles on business and human rights will be implemented in 2025 and 2026.

Engagement with people in Fintraffic's own workforce

Interaction between employees and employers is regular and transparent. Employees have an opportunity to provide feedback through an annual employee satisfaction survey conducted with an external service provider. It also offers an opportunity to give open feedback. A total of 192 pages of open feedback were provided in the 2024 Pulssi survey. The feedback is also carefully reviewed by the top management. Topical issues are also discussed in triannual reports and personnel briefings organised several times a year, where it is possible to bring up personal views and ideas.

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

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

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

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

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



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

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

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

tional safety and health representatives. The wellbeing at work group discusses topical issues related to personnel wellbeing.

In potential change situations, the personnel are consulted as required by the Act on Co-operation within Undertakings, either through their representatives or directly. In accordance with the Act on Co-operation within Undertakings, the employer must consult the personnel, for example, when the employer considers measures which may lead to notice of termination, lay-off or reducing a contract of employment to a part-time contract of one or several employees on financial or productive grounds or to unilateral amendment of an essential condition of the employment contract. Any major changes in duties, working methods, arrangement of work and work premises, or arrangements in the regular working hours that affect the position of one or several employees considered by the employer that fall within the scope of the employer's power of management are also covered by the obligation to negotiate on changes. Depending on the matter, the negotiations may take more than six weeks. During them, the personnel can express their views and concerns about the employer's plans. The views and opinions of the personnel are taken into account in decision-making as far as possible. In 2024, we negotiated on changes on matters such as the remote air traffic control project and reorganisations in rail traffic incident management duties.

Measures to provide remedy for human rights impacts

No human rights impacts that would have required remedy were identified in 2024. As Fintraffic operates in Finland, its stakeholders have access to state-guaranteed legal remedies. Regarding Fintraffic's own workforce, these are the dispute resolution procedure referred to in the collective agreements, contacting or submitting an enforcement request to the occupational safety and health authority (Regional State Administrative Agency) and bringing the matter before the competent court. Employees can also contact the Office of the Non-Discrimination Ombudsman or the Office of the Equality Ombudsman. In practice, the remedies being used are compensation or damages paid by the company.

Internationally recognised instruments

In practice, Fintraffic's policies correspond to the UN Guiding Principles on the corporate responsibility for human rights. As the company's activities have not been considered to involve significant human rights risks, Fintraffic has not yet implemented all the formal processes required by the UN principles on business and human rights. In the future, human rights impact assessment procedures will be included in the company's general risk assessment, and the UN principles on business and human rights will be implemented in 2025 and 2026.

Workplace accident prevention policies

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

The occupational health and safety activities are based on Fintraffic's values and strategies, and they support the achievement of the Group's and its subsidiaries' social, business and wellbeing objectives. The activities are based on existing legislation.

Occupational safety and health activities are based on the development and continuous improvement of the occupational safety culture. The focus of the activities is on proactive actions. Any deviations and problems observed are responded to immediately. A precondition for implementing and developing safety and wellbeing at work is good cooperation and mutual trust between the management, supervisors and personnel.



Policies on eliminating discrimination and harassment

Fintraffic's anti-discrimination and anti-harassment measures and measures to promote diversity and inclusion are described in the equality and non-discrimination plan, which has been prepared together with personnel representatives. At Fintraffic, equality and non-discrimination include the fair treatment of every person regardless of their gender, age, ethnic background, religion, state of health, possible disability, sexual orientation, gender identity or other personal factors.

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

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

Commitments and intervention

Already when planning the new Helsinki premises project, account was taken of gender diversity in

designing the social facilities and the possibilities of persons with reduced mobility to move in the premises. Fintraffic has drawn up the principles of a safer workplace in cooperation with the occupational safety and health and the employer's representatives. The principles have been discussed by the wellbeing at work group and the Group Management Team. So far, Fintraffic has not made any other policy-related commitments concerning inclusion or positive actions for the benefit of persons belonging to particularly vulnerable groups in the company's own workforce.

Discrimination is addressed in the manner described in the equality and non-discrimination plan and in the guidelines prepared to prevent harassment and inappropriate treatment. The Chief Human Resources Officer is responsible for anti-discrimination and anti-harassment policies and their implementation.

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

Interaction between employees and employers is regular and transparent. Employees have an opportunity to provide direct feedback through an annual employee satisfaction survey conducted with an external service provider. It also offers an opportunity to give open feedback. A total of 192 pages of open feedback were provided in the 2024 Pulssi survey. The feedback is also carefully reviewed by the top

management. As the survey is anonymous, it can be thought that this provides employees belonging to minority groups or who are otherwise in a vulnerable position a low-threshold opportunity to express their opinions. This engagement is consultative by nature.

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

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

Workers' representatives are reimbursed for attending the meetings and for the costs derived from attending them. The employer's representatives use sufficient working hours to ensure engagement with the workforce. The CEO of each Group company is responsible for hearing the views of the employees and taking them into account in decision-making. If the cooperation negotiations have concerned the reduction of personnel, the employer will notify in writing what decisions it will take after the cooperation negotiations have been held. Depending on the matter, this engagement is either consultative or participatory by nature as defined in the Act on Co-operation within Undertakings.

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

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



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

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

Depending on the matter, this engagement is either consultative or participatory by nature.

Fintraffic has a wellbeing at work group that meets about once a month. The members include not only employer's representatives but also shop stewards or workers' representatives and occupational safety and health representatives. This engagement is consultative by nature.

The personnel have had the opportunity to provide their views on equality issues through the Responsible Employer survey conducted by Oikotie. Oikotie has announced that it will discontinue its services concerning working life, but from 2025 onwards, Fintraffic will transfer the survey's sections Non-Discrimination and the Work-life balance and well-being to its annual Pulssi personnel survey.

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

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

If the company's plans are considered to have negative impacts on its own workforce, ways to mitigate them will be sought in cooperation with the workers or workers' representatives even before decisions are made as described in the Act on Co-operation within Undertakings. This includes the preparation of a statutory action plan.

Fintraffic employees can report their concerns and needs to their own supervisor, HR management, shop steward or workers' representative, occupational safety and health representative or occupational health care. All Fintraffic employees also have access to an anonymous whistleblowing channel, which allows them to bring any grievances they have observed to the attention of the company's top management. The channel allows the whistleblower to specify which group company the report concerns. The anonymous whistleblowing channel was set up by Fintraffic in 2022 and implemented and managed by an external service provider. There is a link to the whistleblowing channel both on the company's intranet and external websites. Notifications submitted to the whistleblowing channel shall be submitted to the Deputy CEO and the Chief Human Resources Officer for consideration. The measures taken shall cover the investigation of the matter, the

preparation of the response and, where appropriate, the measures required by the reported incident. A statement of the measures taken shall be given to the whistleblower. The reports are reviewed together with the Audit Committee, which acts as the executive committee of the company's Board of Directors, and the cooperation group in which workers' representatives are present. The deadlines laid down in the Whistleblower Protection Act (1171/2022) are observed in the processing of reports submitted to the whistleblowing channel. The annual personnel survey asks if employees are aware of the anonymous whistleblowing channel. As the identity of the whistleblower is not disclosed to the employer, no processes have been created to protect the whistleblower from retaliation.

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

All employees can contact the Regional State Administrative Agency or ultimately bring the dispute before a court.



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

The Group Management Team reviews the material impacts, risks and opportunities related to Fintraffic's own workforce in connection with the risk assessment. In accordance with the risk management policy included in Fintraffic's corporate governance guidelines, the risk assessment is reviewed at least twice a year with the Management Team and the Board of Directors' Audit Committee. Fintraffic also tries to manage negative and positive impacts on its own workforce as well as risks and opportunities as part of strategic planning and operational planning. Every year, a sustainability review will be carried out. It will discuss the impact of the risks and opportunities related to Fintraffic's own workforce on the strategy and business model as well as the impacts of the strategy and business model on the company's own personnel. With regard to possible changes in business activities, the potential impacts on Fintraffic's own workforce will be carefully assessed separately in each case. Opportunities for own workforce are also assessed as part of an annual work community development plan, which is discussed in cooperation with shop stewards or

workers' representatives and occupational safety and health representatives.

Fintraffic's HR department employs 16 professionals in the field. The operations are led by an experienced Chief Human Resources Officer, who is a member of the Group Management Team and reports to the Group CEO. Payroll is outsourced to our partner. Both HR employees – HR Business Partners, employee relations managers and the Chief Human Resources Officer in particular – and business management engage in regular dialogue with HR representatives. The Group-wide cooperation group, which includes shop stewards and workers' representatives and occupational safety and health representatives from all business operations and shared services, as well as the CEOs of business operations and the Chief Human Resources Officer, meets four times a year. Regular company-specific cooperation meetings are also organised.

The wellbeing at work group led by the wellbeing manager, to which shop stewards and workers' representatives, occupational safety and health representatives and the occupational safety and health manager belong, meets almost monthly. The personnel can also express their views in an anonymous personnel survey organised once a year. In the 2024 survey, the personnel gave open feedback amounting to 192 pages. Based on the feedback received in the Pulssi personnel surveys in previous

years, Fintraffic introduced popular employee bikes and Fintraffic's student exchange programme, in which employees familiarise themselves with the work of another unit for one day. The employees' opinions are also sought in various projects. The corporate culture survey conducted in autumn 2024 was open on the intranet between 17 September and 3 October 2024, and all interested parties could respond to it anonymously.

Negative impacts

As part of the double materiality analysis, employee privacy, including data security, has been assessed as a material topic for Fintraffic. As a critical actor for security of supply, Fintraffic may be exposed to information and cybersecurity threats, which entails the risk that the employees' personal data may be exposed to data leaks. The risk is managed by appropriate technical protection measures and by training the personnel to detect and report deviations.

As part of the double materiality analysis, the promotion of the health, safety and wellbeing of employees has been assessed as a material topic for Fintraffic. As we provide traffic control services around the clock, more than 66 per cent of our personnel do shift work. Especially night work involves identified stress factors that are managed by means of shift planning and by providing personnel with training on, for example, the importance of suffi-

cient sleep and healthy lifestyles. Office work, which is daytime work, is carried out quite flexibly as hybrid work. People at Fintraffic experience less exhaustion and stress than employees in reference companies. Fintraffic combats the risks associated with stress factors by encouraging its personnel to lead a healthy lifestyle, through the groundbreaking Fit for Future Fintraffic weight management pilot project, through regular health checks, by offering a break exercise application free of charge for employees and by providing comprehensive wellbeing, cultural and physical activity benefits.

Positive impacts

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



YEAR 2024		STRATEGY	BUSINESS	SUSTAINABILITY
<p>critical for the strategy also helps the personnel better understand the strategy and the requirements it poses for competence.</p> <p>In 2023, the most critical shared strategic competences were developed with transport modes. In spring 2024, a C&Q competence survey was procured to map the competences at Fintraffic. For those working as experts, the survey and system were tested as part of a pilot project. In late autumn 2024, the survey was expanded to all those working in expert roles. In connection with the competence survey, each employee will prepare a personal development plan with their supervisor, in which they record which competences they primarily need to develop and by what means. The development plan will be linked to development discussions held once a year. In other words, the measures will be transferred to the development discussion template of the personnel information system.</p> <p>As part of the double materiality analysis, an equal work community has been assessed as a material topic for Fintraffic. Fintraffic wants to promote non-discrimination and equality among its own workforce. An equal work community that takes into account inclusion, fair opportunities for advancement and adequate compensation promote the wellbeing and motivation of employees. Already when planning the new Helsinki premises project, account was taken of gender diversity in designing the social facilities</p>		<p>and the possibilities of persons with reduced mobility to move in the premises. Fintraffic has drawn up the principles of a safer workplace in cooperation with the occupational safety and health and the employer's representatives. For two years, we have participated in the Responsible Employer campaign of Oikotie, which involved carrying out a sustainability survey among the personnel.</p> <p>As part of the double materiality analysis, the promotion of worker health and wellbeing has been assessed as a material topic for Fintraffic. The health and wellbeing of employees is promoted through numerous measures. Employer's actions to support the wellbeing of their own workforce have been assessed as material positive impacts on Fintraffic's own workforce. Fintraffic has been awarded the Mental Health Friendly Workplace certificate by Mieli ry for 2022, 2023 and 2024. Fintraffic offers a significantly broader occupational health care scheme than the one required by law. It covers all Fintraffic employees regardless of the character and duration of the employment relationship. Occupational health care promotes a healthy working environment and safe working conditions. In addition to statutory preventive occupational health care, Fintraffic offers its employees comprehensive medical care services at the level of general practitioners and specialists included in voluntary occupational health care. Workers also have access to</p>	<p>occupational physiotherapists (including direct appointments), physiotherapists and occupational health psychologists. Short-term psychotherapy is offered with a referral from an occupational healthcare physician or occupational psychologist to those who need it. Occupational health services for Fintraffic are provided by Suomen Terveystalo Oy.</p> <p>Mieli ry's Chatti 24/7 service and digital service Sparri are also included in our wellbeing services. Everyone working at Fintraffic can use Cuckoo, an app that provides mindfulness exercises and short fitness programmes for breaks. Alma Talent's extensive online bookshelf is also available to all employees, offering books on topics such as self-management and work community skills.</p> <p>In 2024, Fintraffic supported the wellbeing of its personnel through exercise campaigns, comprehensive occupational health care services and Auntie, a low-threshold mental wellbeing service. The employee bike was a popular employee benefit in 2024: more than 300 Fintraffic employees were already using one. In September 2024, 306 Fintraffic employees had an employee bike as a tax-exempt benefit, and 31 employees had purchased the employee bike as their own. In 2024 (January–September), 77 employees accepted the employee bike benefit. The users of the employee bike are very satisfied with the benefit.</p>	<p>According to our occupational health partner Terveystalo, Fintraffic manages work ability matters exceptionally systematically, comprehensively and productively. The wellbeing index shows a positive trend. In 2024, it was 94.8 per cent, up from 94 per cent a year earlier. In 2021, the index was 86.7%. The index describes the share of people who do not experience any of the following problems: inadequate control over work, conflicts in harmonising work and other areas of life, work is not sufficiently rewarding, not enough social support at work, stress and job dissatisfaction. The wellbeing index is based on the responses to Terveystalo's health survey.</p> <p>According to the TyöOptimi wellbeing survey conducted by Terveystalo in spring 2024, 82% of the respondents at Fintraffic are doing well. In Terveystalo's comprehensive comparison data containing more than 10,000 respondents, 66% of the respondents reported that they were doing well. In 2023, Fintraffic's comparison figure was 77 per cent, i.e. the reported wellbeing has increased from the comparison year. Among Fintraffic personnel, 8 per cent of the respondents were exhausted or at risk of exhaustion (9% in 2023), compared to 16 per cent in Terveystalo's reference material.</p> <p>Of Fintraffic personnel, 20 per cent are overweight, and most of them suffer from at least one disease associated with overweight, such as diabetes. Weight management has been identified as a work</p>



		YEAR 2024	STRATEGY	BUSINESS	SUSTAINABILITY
	ability risk for 22 per cent of the respondents to the health survey. We aim to address this challenge with a pioneering wellbeing project, Fit for Future Fintraffic. It is aimed at inspiring insights into permanent weight management and strengthening motivation to foster personal wellbeing with the assistance of a multiprofessional team. Employees apply to the programme and the occupational health care provider selects the participants. To help the weight management, the participants will also be prescribed weight management medication, which is used under the guidance of an occupational health physician. The initial results of the programme are excellent.				
	Risks related to Fintraffic's own workforce have been described as part of the double materiality analysis. Fintraffic's operations consist of the sale of expert services, which means that the operations are entirely dependent on expert personnel. The availability of skilled labour has been identified as a material risk. To prevent the risk, Fintraffic trains its personnel quite comprehensively. Fintraffic Railway has training programmes for the various tasks in the service functions in operational services. Regular refresher and further training ensure that the organisation has competent personnel trained in a timely manner working for it.				
	ensures the continuous maintenance of the competence level of the personnel. Avia College, which operates as part of Air Navigation Services, organises basic training for air traffic controllers and flight information service officers. It also organises unit and further training. In addition to these, Avia College also provides initial and refresher training for on-the-job trainers and competence assessors.				
	Fintraffic Vessel Traffic Services organises training for VTS operators and shift supervisors in accordance with the Vessel Traffic Service Act. The basic VTS operator training is described in the quality system. The learning paths of project managers, project owners and project team members are described on the Group's intranet. Operational personnel practise situations related to their professional competence in simulators. Both Vessel Traffic Services Centres have a simulator coordinator tasked with building and implementing appropriate exercises together with the training organisation.				
	At Fintraffic Road, the training programme for Road Traffic Centre operators is built on module-based training periods. The purpose of the module format is to ensure that the training is suitable for both those with a longer and those with a shorter operator experience so that they can develop and maintain their professional skills. The modular approach also provides an opportunity to quickly adapt training to the changes in the operating				
		environment. The purpose of the training is to guarantee a nationally uniform level of competence and a nationally uniform service level for traffic control.			
		Monitoring and assessment			
		The targets, metrics and measures related to the development and maintenance of personnel resources that support the management of the company's special assignment concern high-quality management, healthy and satisfied personnel and the strengthening of equality and non-discrimination. All of these involve development measures and targets as well as metrics, some of which are monitored as part of the strategy programmes and some as part of the sustainability programme. The Board of Directors is regularly informed of the progress of both the strategy and the sustainability programme.			
		The targets are related to increasing the health and wellbeing of employees and reducing the perceived harmful workloads. Efforts will also be made to mitigate the adverse effects of shift work. Discrimination and harassment will be addressed, and equality will also be improved by developing family-friendly workplace practices. An example of this is the Family Federation of Finland's Family-Friendly Workplace Programme. Equality will also be improved by drawing up an age programme.			
				Fintraffic offers its personnel training that is estimated to have a positive impact on the person's career development and work motivation. To develop the employees' competence in areas essential for the strategy, we have initiated a competence survey of strategic competences to measure how our competence targets coincide with the current level of competence. Defining and verbalising competences that are critical for the strategy also helps the personnel better understand the strategy and the requirements it poses for competence.	
				In 2023, the most critical shared strategic competences were developed with transport modes. In spring 2024, a C&Q competence survey was procured to map the competences at Fintraffic. For those working as experts, the survey and system were tested as part of a pilot project. In late autumn 2024 and early 2025, the survey will be expanded to all those working in expert roles. In connection with the competence survey, each employee will also prepare a personal development plan with their supervisor, in which they record which competences they primarily need to develop and by what means. The development plan will be linked to development discussions held once a year. In other words, the measures will be transferred to the development discussion template of the personnel information system.	
				Three of the metrics related to high-quality management consist of personnel satisfaction survey	



	YEAR 2024	STRATEGY	BUSINESS	SUSTAINABILITY
<p>indicators. These include activities in line with the values, the supervisor index and the success of management. Other indicators of high-quality management include an internal customer satisfaction survey for shared services, a reputational survey conducted by T-Media and the indicator for measuring the maturity level of impact.</p> <p>The indicators related to healthy and satisfied personnel consist of the personnel satisfaction survey indicators, i.e., eNPS, overall result and workload. The way the sick leave rate develops is also monitored.</p> <p>Oikotie’s Responsible Employer survey’s non-discrimination and work-life balance and wellbeing indexes were selected as the metrics for equality and non-discrimination. At the end of November 2024, Oikotie announced that it would discontinue its business activities concerning working life and the Responsible Employer programme. Therefore, new metrics must be selected for equality and non-discrimination.</p> <p>Assessing the necessary and appropriate actions</p> <p>Fintraffic’s management has selected the appropriate and necessary actions to respond to the negative impacts on the company’s own workforce. The identified risks have been discussed with workers’ representatives in the cooperation group.</p>	<p>Cyber and information security incidents and deviations are processed, monitored and tracked in the safety reporting and risk management systems. Fintraffic’s information security management team and information security officers for each business area regularly review the state of cybersecurity and information security and maintain a list of threats and risks. Cybersecurity and information security threats have been addressed as part of the risk assessment.</p> <p>The workload experienced by the personnel has been discussed as part of the prioritisation of activities. By prioritising projects, some of the projects have been left to wait until later and efforts have been made to free up working hours for the implementation of the most critical projects. Measures related to shift and night work have been discussed in the management of the business areas. Efforts have been taken to reduce the negative impacts of shift and night work on managing alertness by, for example, including breaks in shifts, providing tailored solutions to work shifts in cases of identified work ability issues and bringing office workout equipment to control rooms.</p> <p>Plans and measures to mitigate risks</p> <p>Lack of employees’ competence and experience can lead to not only decreased job satisfaction but also increase in various safety risks. This risk is addressed</p>	<p>by training and inducting personnel. Fintraffic Railway has training programmes for the various tasks in the service functions in operational services. Regular refresher and further training ensure that we have competent personnel trained in a timely manner working for us.</p> <p>Fintraffic Air Navigation Services’ personnel training is continuous and regular. The training ensures the continuous maintenance of the competence level of the personnel. Avia College, which operates as part of Air Navigation Services, organises basic training for air traffic controllers and flight information service officers. It also organises unit and further training. In addition to these, Avia College also provides initial and refresher training for on-the-job trainers and competence assessors.</p> <p>Fintraffic Vessel Traffic Services organises training for VTS operators and shift supervisors in accordance with the Vessel Traffic Service Act. The basic VTS operator training is described in the quality system. The learning paths of project managers, project owners and project team members are described on the Group’s intranet. Operational personnel practise situations related to their professional competence in simulators. Both Vessel Traffic Services Centres have a simulator coordinator tasked with building and implementing appropriate exercises together with the training organisation.</p>	<p>At Fintraffic Road, the training programme for road traffic centre operators is built on module-based training periods. The purpose of the module format is to ensure that the training is suitable for both those with a longer and those with a shorter operator experience so that they can develop and maintain their professional skills. The modular approach also provides an opportunity to quickly adapt training to the changes in the operating environment. The purpose of the training is to guarantee a nationally uniform level of competence and a nationally uniform service level for traffic control.</p> <p>Fintraffic’s operations depend on the work input of competent personnel. Due to a strike or other industrial action, the activities may stop completely, causing a decrease in the service level and even loss of income. The threat of strikes is prevented by seeking to engage in a continuous dialogue with workers’ representatives and to negotiate collective agreements well in advance while the previous collective agreement is still in force. If Fintraffic is subjected to industrial action, the work can to some extent be carried out by supervisors. In the view of the trade unions, the right to strike is part of the freedom of association under International Labour Organisation (ILO) Convention No 87. The ILO has lodged a request for an advisory opinion on the matter with the International Court of Justice (ICJ). Fintraffic respects the workers’ rights. The significance of</p>	



strikes for the employer’s activities cannot be completely eliminated by means available to the employer.

Engaging key persons and recruiting the necessary capabilities is critical for Fintraffic’s operations. Possible negative impacts on terms of employment or working conditions may cause reputational damage, which makes recruitment and thus the company’s operations more difficult. As described above, Fintraffic strives to look after its personnel and develop the work community so that Fintraffic would be a good place to work for its personnel. As part of the development of the corporate culture, a survey on the development of the corporate culture was conducted for the entire personnel on the intranet in autumn 2024. In the survey, the personnel could also register for open corporate culture workshops, which were carried out in October.

Plans and measures to pursue opportunities

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

The ongoing competence survey examines Fintraffic’s level of competence in certain areas of competences critical to the Group’s strategy. The aim is to direct competence development measures to the right issues, especially those areas experiencing the greatest competence gaps. Based on the survey, a gap analysis will be carried out. At the same time, the competence survey makes the strategy concrete for the personnel and promotes discussion between supervisors and subordinates on the employees’ competences. As part of the survey, employees can report their interest in developing a certain area of competence.

In addition to the measures described above to develop the corporate culture and work community, Fintraffic plans to participate in the Family-Friendly Workplace Programme of the Family Federation of Finland. The programme is intended for supporting family friendliness, equality between people, diversity in the work community and the development of equality. The programme is not limited to families with children only, but the concept of family is broad: family friendliness covers the different stages of life. The Fit for Future Fintraffic pilot project aimed at improving personnel wellbeing will be completed. Its results will be used as a basis for assessing how to expand the programme.

Fintraffic is working on the company’s age programme. Based on the programme, measures will

be implemented for the management and wellbeing of people of different ages and the elderly, and supervisor training will be organised in age management. Especially the abolition of the lower retirement age of 55 at Air Navigation Services has increased concerns about how personnel will cope in shift work. The management of the personnel’s workload will continue through project prioritisation. Training will be organised for traffic control personnel to reduce the adverse effects of shift work. A study is being planned in rail traffic management on how to assess the state of alertness.

Supervisors will be trained in DEI themes and in intervening in discrimination and harassment. Development measures are also assessed on the basis of the results of the personnel survey. For the first time, the Pulssi personnel satisfaction survey 2024 asked the personnel about their experiences of how equality and non-discrimination are realised at Fintraffic (“According to your assessment, how equal treatment and non-discrimination have been realised at Fintraffic”). On a scale of one to five, this section was rated 3.9. This indicator can be used in later years to monitor how the experience of equality and non-discrimination develops. Finnish privacy legislation prevents the employer from collecting information on belonging to a certain minority group. In the future, however, we will examine whether an anonymous survey, such as the Pulssi survey, would

enable us to ask the respondents whether they belong to a minority group to determine whether the experience of employees belonging to different minority groups differs from that of the majority of employees.

In the next few years, we will continue to participate in Oikotie’s Responsible Employer survey, whose indicator “Non-discrimination” can be used to monitor how we succeed in this area. In the 2024 survey, non-discrimination had improved compared to 2023 (3.34 → 3.55).

Practices

Fintraffic complies with the principle laid down in the Act on Co-operation within Undertakings (1333/2021), according to which the impacts of the employer’s plans on the personnel are discussed in the manner referred to in the Act on Co-operation within Undertakings before the decision is made. In accordance with the Act on Co-operation within Undertakings, the grounds, impacts, alternatives and schedules of the employer’s plans are negotiated with either the workers’ representative or, if there is no such representative, all employees affected by the change.

In potential change situations, the personnel are consulted as required by the Act on Co-operation within Undertakings, either through their representatives or directly. In accordance with the Act on Co-op-



eration within Undertakings, the employer must consult the personnel, for example, when the employer considers measures which may lead to notice of termination, lay-off or reducing a contract of employment to a part-time contract of one or several employees on financial or productive grounds or to unilateral amendment of an essential condition of the employment contract. Any major changes in duties, working methods, arrangement of work and work premises, or arrangements in the regular working hours that affect the position of one or several employees considered by the employer that fall within the scope of the employer's power of management are also covered by the obligation to negotiate on changes. Depending on the matter, the negotiations may take more than six weeks. During them, the personnel can express their views and concerns about the employer's plans. The views and opinions of the personnel are taken into account in decision-making as far as possible. In 2024, we negotiated on changes on matters such as the remote air traffic control project and reorganisations in rail traffic incident management duties.

Resources

Fintraffic's HR department employs 16 professionals in the field. The operations are led by an experienced Chief Human Resources Officer, who is a member of

the Group Management Team and reports to the Group CEO. Payroll is outsourced to our partner. Both HR employees – HR Business Partners, employee relations managers and the Chief Human Resources Officer in particular – and business management engage in regular dialogue with HR representatives. The Group-wide cooperation group, which includes shop stewards/employee representatives and occupational safety and health representatives from all business operations and shared services, as well as the CEOs of business operations and the Chief Human Resources Officer, meets four times a year. Regular company-specific cooperation meetings are also organised.

The wellbeing at work group led by the wellbeing manager, to which shop stewards and workers' representatives, occupational safety and health representatives and the occupational safety and health manager belong, meets almost monthly. The personnel can also express their views in an anonymous personnel survey organised once a year. In the 2024 survey, the personnel gave open feedback amounting to 192 pages. Based on the feedback received in the Pulssi personnel surveys in previous years, Fintraffic introduced popular employee bikes and Fintraffic's student exchange programme, in which employees familiarise themselves with the work of another unit for one day. The employees'

opinions are also sought in various projects. The corporate culture survey conducted in autumn 2024 was open on the intranet between 17 September and 3 October 2024, and all interested parties could respond to it anonymously.

Target setting process

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



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

Theme	2025 target	2030 target	Key actions
Ensuring employee well-being and occupational safety	Concrete measures have been found to support the health of workers. Fintraffic personnel are doing better than in comparison companies. The workload experienced by the personnel has decreased. Mitigating the disadvantages of shift work. Getting the “Mental Health Friendly Workplace” certificate for 2025.	Concrete measures have been found to support the health of employees, and their health has improved in proportion to population level data. Fintraffic personnel are doing better than in comparison companies.	Completion of the Fit For Future Fintraffic programme and evaluation of its results. Deciding on the continuation of the programme. Workload management through project prioritisation. Training to reduce the adverse effects of shift work. Pilot study at Railway to assess alertness.
Strengthening equality and non-discrimination	As a result of the training, the competence of supervisors has increased in DEI matters and in intervening in discrimination and harassment. Improving Fintraffic’s family friendliness. We joined the Family-Friendly Workplace Programme of the Family Federation of Finland, targets in accordance with the programme. The consideration of employees of different ages will be improved by publishing Fintraffic’s age programme and training supervisors in age management.	The personnel estimated that non-discrimination and equality had developed favourably. The personnel feel that Fintraffic’s family friendliness has improved measurably. The employees reported that they feel that Fintraffic offers solutions for reconciling different stages of life and work (young people, trainees, older people).	Training supervisors in DEI themes and intervention. Assessing the results of personnel surveys and deciding on measures. We will join the Family-Friendly Workplace Programme of the Family Federation of Finland, targets in accordance with the programme. Preparing Fintraffic’s age programme and implementing the measures planned in it and organising supervisor training in age management.
Development of staff expertise	Fintraffic has a clear understanding of the organisation’s competence related to key strategic themes.	Targeted training and certain recruitments have reduced bottlenecks in competence. In particular, there is a functional model for supporting career transitions across modes of transport, and staff competence is utilised across transport mode boundaries.	Gap analysis based on competence mapping + plan for training/attaining competence/other measures required by the strategy (job rotations, etc.) Systematic successor and substitute planning. Strengthening cooperation in the utilisation of expertise across transport mode boundaries.



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

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

Average number of employees (persons)*	2024	2023
Men	907	885
Women	291	275
Total number of employees	1,198	1,160

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

Types of employment 31 December 2024	Women (persons)	Men (persons)	Total (persons)
Number of employees	290	906	1,196
Number of permanent employees	273	877	1,150
Number of fixed-term employees	17	29	46
Number of employees working variable working hours*	7	31	38
Number of full-time employees	269	837	1,106
Number of part-time employees	14	38	52

* Including those invited to work if necessary

holidays, the work being of project or seasonal nature, unestablished demand and the employee’s own request. 80 per cent of part-time employment contracts are concluded at the employee’s initiative.

Employee turnover	2024	2023
Employment has ended (persons)*	70	77
Turnover %	5.85	6.53

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

Employee turnover rate, % =

Number of employees who left the company between Jan 1 and Dec 31

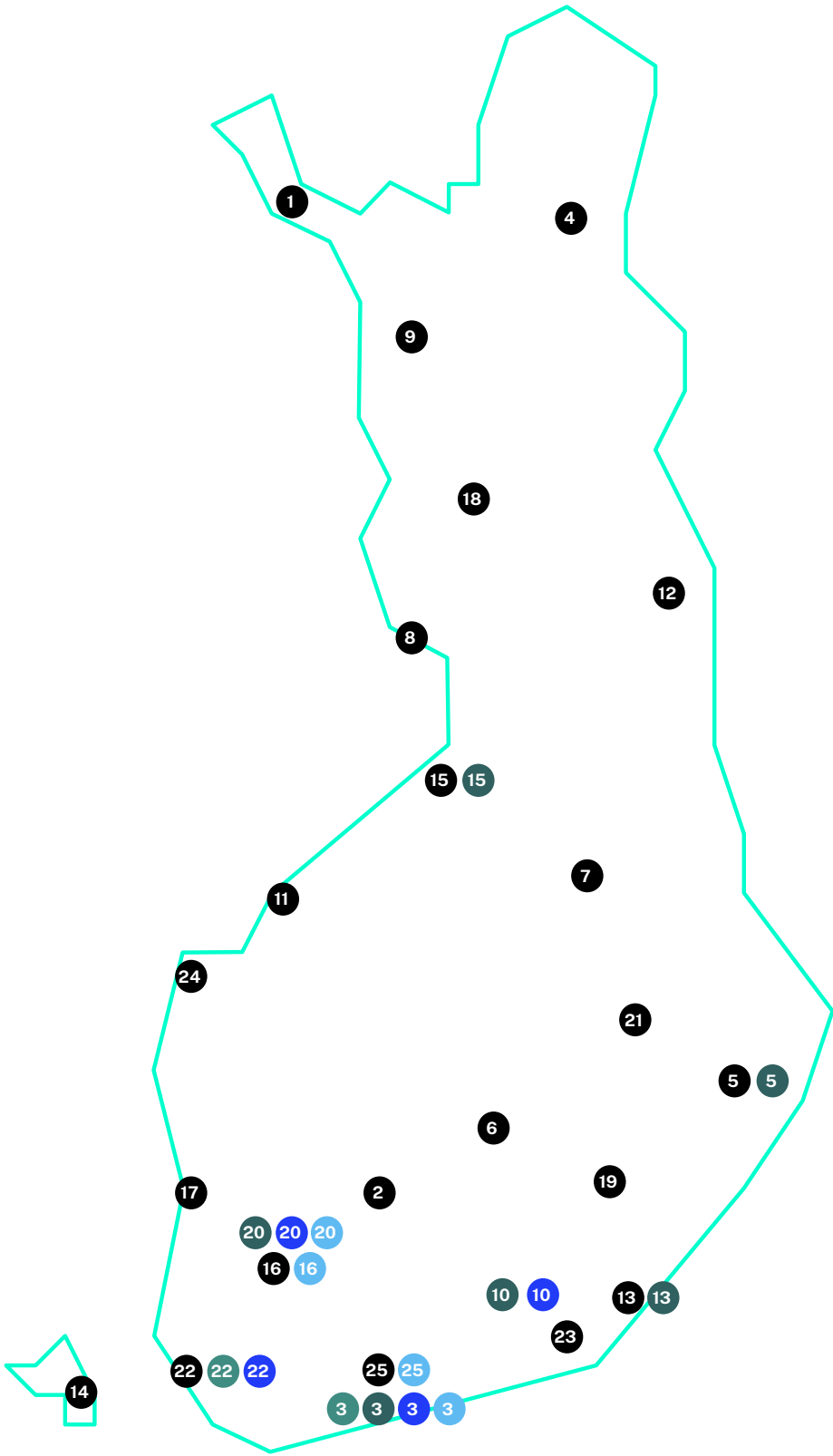
Total number of employees on Dec 31

x 100

Business locations by company 31 Dec 2024

- 1 Enontekiö 1
- 2 Halli 1
- 3 Helsinki 373
- 4 Ivalo 4
- 5 Joensuu 4
- 6 Jyväskylä 10
- 7 Kajaani 4
- 8 Kemi 3
- 9 Kittilä 4
- 10 Kouvola 94
- 11 Kruunupyy 4
- 12 Kuusamo 3
- 13 Lappeenranta 3
- 14 Maarianhamina 3
- 15 Oulu 86
- 16 Pirkkala 16
- 17 Pori 4
- 18 Rovaniemi 16
- 19 Savonlinna 1
- 20 Tampere 156
- 21 Toivala 14
- 22 Turku 76
- 23 Utti 3
- 24 Vaasa 5
- 25 Vantaa 307

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





Collective bargaining coverage and social dialogue (S1-8)

The majority of Fintraffic’s employees, 83 per cent, are covered by collective agreements. The largest number of Fintraffic personnel, 30 per cent, are covered by the Collective Agreement for Customer Service, Traffic Management and Control and Administrative and Other Office Work (2 March 2023–31 March 2025) applied at Fintraffic Railway Ltd. The second largest number of personnel, 15 per cent, are covered by the collective agreement for air traffic controllers at Fintraffic Air Navigation Services Ltd (19 May 2021–30 April 2024). Another major collective agreement in air navigation is the collective agreement covering Fintraffic Air Navigation Services Ltd (20 May 2022–29 February 2024), which covers 11 per cent of the Group’s personnel. Nine per cent of the Group’s employees are covered by the collective agreement for the railway industry (in force until 31 March 2025). The largest number of Fintraffic Road Ltd’s personnel are covered by the collective agreement for Fintraffic Road Ltd (in force until 31 March 2025) and the largest number of Fintraffic Vessel Traffic Services Ltd’s personnel are covered by the collective agreement for Fintraffic Vessel Traffic Services Ltd (in force until 31 March 2025), together making up a total of 16 per cent of the Group’s personnel. Approximately two per cent of the Group’s personnel are

covered by the collective agreement for aeronautical technical personnel (valid until 28 February 2025). About 17 per cent of the Group’s personnel are not covered by any collective agreements. Their terms of employment and working conditions are specified in their employment contracts and in the policies and principles followed by their employer.

	Coverage of employment contract negotiations	Social dialogue
Coverage rate	Employees – EEA	Representation at the workplace
0–19%		
20–30%		
40–59%		
60–79%		
80–100%	Finland	Finland
Fintraffic does not have employees covered by collective agreements outside the EEA.		

Diversity metrics (S1-9)

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

Age distribution of employees per 31 December 2024

Age group	Number of employees in age group (persons)	Share of employees of personnel (%)
Persons aged 30 or less	66	5%
Persons aged 30–50	700	59%
Persons aged over 50	430	36%

Adequate wages (S1-10)

The wages Fintraffic pays to all its employees meet at least the requirements of the Directive (EU) 2022/2041 of the European Parliament and of the Council. Employees covered by collective agreements are paid the wages specified in each collective agreement. Those outside the collective agreement are paid on the basis of the employment contract. The lowest wage paid to a full-time employee on the basis of an employment contract is 68 per cent of the gross median wage paid in Finland.

Training and skills development metrics (S1-13)

In 2024, a regular performance and career development assessment was carried out for 84% of employees.

	2024		2023	
Kattavuusaste	Women*	Men**	Women*	Men**
Performance and career development assessment	85%	84%	82%	81%
Number of training hours (hours)	6,758	22,661	6,635	25,585

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



Health and safety metrics (S1-14)

All Fintraffic personnel (100%) are covered by statutory occupational health care. The service is provided by Suomen Terveystalo Oy. The content of occupational health care is described in the procurement agreement and service description between Fintraffic and the service provider.

In 2024, the number of fatalities due to occupational injuries and work-related health problems was zero.

Fintraffic personnel had 10 workplace accidents and 18 commuting accidents. None of the accidents at the workplace led to sick leave, so the accident frequency rate in 2024 stood at zero. These accidents mainly involved minor stumbles and slips.

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

Work-life balance metrics (S1-15)

All Fintraffic employees regardless of gender are entitled to use family leaves under the Employment Contracts Act and/or collective agreements. Fintraffic offers both parents an opportunity to take paid family leave regardless of gender in accordance with collective agreements. The employer also applies the same principles to employees outside collective agreements.

	2024		2023	
Kattavuusaste	Women*	Men**	Women*	Men**
Employees who have taken family leave	3.8%	4.9%	5.0%	5.7%

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

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

	Traffic Operators	Other personnel	Non-CBA employees	All employees
Fintraffic Road	1.03	1.03	N/A	0.85*
Fintraffic ANS	1.00	0.90*	0.75*	0.78
Fintraffic VTS	0.96	N/A	N/A	1.02
Fintraffic Rail	0.98	0.96	1.09	1.01
Shared services	N/A	N/A	0.77**	0.77**
Total	0.97	0.92	0.71*	0.90

* The pay gap is explained by the fact that more demanding roles, as well as managerial and leadership positions, are predominantly held by men.
** In Shared Services, women and men do not perform the same types of work. Men are more often in leadership positions, which contributes to the pay gap.

In the “Traffic Operators” group, women and men perform largely the same work, and there is little to no pay gap. In the “Other Personnel” group, women and men carry out a wider range of different tasks, which partly explains the differences. Once the job grading process is completed, it will be possible to compare different roles based on their level of responsibility—provided that group sizes allow for such comparison.

	2024	2023
CEO’s annual earnings, fixed portion	€ 298,680	€ 294,187
CEO’s annual earnings, variable portion	€ 45,788	€ 36,193
Total	€ 344,468	€ 330,380
Average annual earnings of personnel, fixed portion	€ 70,764	€ 67,981
Average annual earnings of personnel, variable portion	€ 2,075	€ 2,051
Total	€ 72,839	€ 70,032
Pay ratio between the personnel and CEO	1:4.7	1:4.7



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

During the reporting period, the employer received a reprimand from the Ombudsman for Equality after a male employee filed a complaint about discrimination on the basis of family care obligations. Negotiations for an amicable settlement of the matter are ongoing.

Fintraffic Air Navigation Services has a dispute pending concerning lay-offs carried out during the coronavirus pandemic. The employees considered that, based on discriminatory grounds, the lay-offs were targeted to a larger number of employees performing air traffic control work only than to employees who also had supervisory duties. No final judgment has been given on the matter.

In addition, in the personnel survey, four people reported having experienced sexual or gender-based harassment and six people reported having experienced harassment in the form of racist or chauvinistic speech.



S3 Affected communities

The materiality analysis highlighted the societal impact of Fintraffic, i.e., the benefits generated for the transport ecosystem and users.

The communities affected by Fintraffic's services are described in the general section of this report (SBM2).

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

In the disclosure requirement, Fintraffic has taken into account the key affected communities as regards its own operations.

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

Fintraffic's own business locations in different parts of Finland are control rooms comparable to office spaces, which do not cause material impacts on

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

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



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

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

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

data, it is possible to optimise the mobility of people and goods to a new level. The port app developed by Fintraffic is a good example of a digital service that promotes traffic functionality. The app sends Information to a variety of operators, who can then use it to optimise the speeds of ships and trucks. And all this accumulated efficiency has a major impact.

Data can be collected and processed from Fintraffic's own sources and its partner network, but things also work the other way around. Through crowd-sourcing, we can also harness the data produced by transport users and increasingly intelligent vehicles. In rail traffic, track capacity can be significantly increased with the aid of new train control systems (the Digirail project), which is a good example of the possibilities afforded by digitalisation in rail traffic. Several digitalisation-based development projects are also underway in other modes of transport, and they will pave the way for optimising the entire traffic ecosystem. They include improving information exchange in road traffic control, creating a situational picture of Finland's lower airspace, introducing digital consignment notes, and providing a maritime traffic notification service.

In 2024, Fintraffic established the Traffic Data Service Cluster to promote the export of transport data services. The aim is to promote the international business of companies operating in Finland.

Fintraffic is committed to operating efficiently. It has an internal efficiency programme, and it has set financial objectives arising from EU regulation in some of its business operations. These ensure that the services ordered by public organisations and commercial air transport from the company are provided cost-efficiently.

Policies related to affected communities (S3-1)

Fintraffic has defined operating principles that guide sustainability actions towards affected communities. The policies have been discussed in the company's sustainability programme and include:

1. promoting safe, smooth and environmentally friendly traffic;
2. ensuring societal preparedness and reliable transport services;
3. enabling economically efficient traffic;
4. smooth cooperation between traffic sector operators;
5. promoting the growth of the data economy, markets and exports in the traffic sector.

The essential impacts, key risks and opportunities concerning the communities affected by our services have been identified in a double materiality analysis based on the principles of the company's risk management process.

Sustainability has been integrated as a key part of Fintraffic's strategy, business activities and other decision-making. Every year, we update the key sustainability impacts, risks and opportunities of our operations. We manage sustainability-related risks as part of our risk management system. We monitor compliance with and implementation of sustainability requirements and initiate remedies if necessary.

Fintraffic has assigned persons responsible for key stakeholders in the Group Management Team. The person responsible coordinates Fintraffic's engagement with the stakeholder in question, determines the development policies and key measures related to the stakeholder and ensures that any negative impacts on the stakeholder's business operations are addressed and the remedies adopted based on them are implemented. The task of the stakeholder engagement officer is to sound the expectations of the stakeholder in question and to bring the expectations, opportunities and risks related to the stakeholder into the Group's strategy process and the double materiality analysis. In addition to engaging closely with the stakeholders, changes in stakeholder activities are monitored by means of media and online monitoring tools and surveys. Fintraffic has a whistleblowing channel.

From 2025 onwards, Fintraffic will update the Group-level stakeholder map annually as part of its strategy process.



Fintraffic’s key stakeholders are the customers (clients and public-sector partners, end-user customers, application developers and data users), the owner, personnel, ministries, research community, industrial policy interest groups, counties and municipalities, politicians and the media.

The policies described above cover all affected communities.

Fintraffic provides services in Finland. We operate in accordance with internationally recognised human rights declarations and national rules. More information on the matter can be found in section S1-1 (on page 87).

In accordance with the sustainability policy approved by Fintraffic’s Board of Directors in December 2024, we comply with the EU’s sustainability regulation and the guidelines set for state-owned companies by the owner. The UN Global Compact principles guide our operations. We apply the Finnish Corporate Governance Code of the Securities Markets Association and the OECD Principles of Corporate Governance. We respect the key human rights declarations, such as the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work.

Fintraffic provides services in Finland. We operate in accordance with internationally recognised human

Stakeholder cooperation

Stakeholder	Stakeholder expectations	Fintraffic's response	Communication with stakeholders
Customers: Public authorities Companies and organizations Application developers and data users Citizens	<ul style="list-style-type: none">• Maintaining a high level of security and reliability• World-class professionalism and quality in traffic control, data and digital services• Smooth and efficient traffic, and lower emissions• Promoting seamless travel and transport chains and mobility services• Support for companies in the sector through, for example, service development in Finland and export markets• Support for public authorities	<ul style="list-style-type: none">• Continuous improvement of the high quality, coverage, and reliability of services and data• Easy and continuous communication; a single contact person for customers• Customer satisfaction surveys and corporate image survey• Increasing our understanding of customers• Customer relationship management• Investments in the operational reliability of service production	Ongoing
Ministry of transport and communications	<ul style="list-style-type: none">• Supporting the implementation of the national Transport 12 plan• Compliance with the Government Ownership Policy• Adhering to the ownership strategy• Creating measurable impact	<ul style="list-style-type: none">• Ensuring the implementation of Fintraffic's strategy• Ongoing communication• Close cooperation with industry stakeholders	Ongoing
Personnel	<ul style="list-style-type: none">• Meaningful work• Fair pay and competitive employee benefits• High-quality supervisory work• Hybrid work and appropriate, high-quality tools• A unified organisational culture and practices• Competence development and maintaining labour-market competency	<ul style="list-style-type: none">• Close and open contact with trade unions• Remuneration systems and competitive employee benefits, including comprehensive occupational healthcare• Training supervisors, and developing tools for supervisors• Developing our corporate culture and competence development• Surveys for supervisors and personnel	Ongoing
Research community and education	<ul style="list-style-type: none">• Scientific advancement, sharing research data, promoting cooperation• A need for internships or master's theses• Influencing the knowledge-based development of the transport system	<ul style="list-style-type: none">• Fintraffic's participation in research projects, joint projects and partnerships• Increasing visibility at educational institutions• Providing internships or thesis opportunities	When necessary
Industrial policy interest groups	<ul style="list-style-type: none">• Open and active dialogue• Promoting common interests	<ul style="list-style-type: none">• Exchanging information within industry forums in Finland and abroad• Proactive participation in organisations' activities	Ongoing
Regions	<ul style="list-style-type: none">• Integration of national and municipal transportation data• Ensuring effective collaboration• Improving accessibility	<ul style="list-style-type: none">• Active dialogue with regions• Harnessing digitalisation in the development of regional accessibility• Services for the whole country	
Politicians	<ul style="list-style-type: none">• Ensuring smooth, safe and environmentally-friendly traffic• Meeting and complying with regulatory standards and requirements• Transparent and efficient operations• Providing information as a basis for decision-making	<ul style="list-style-type: none">• Providing world-class traffic management, digital services and data• Ensuring the reliability of traffic control and management• Compliance with regulations and regulatory standards• Close cooperation with political actors; knowledge creation	When necessary
Media	<ul style="list-style-type: none">• Active information sharing• Interesting conten	<ul style="list-style-type: none">• Continual communication via Fintraffic's various channels• Proactive cooperation and regular meetings with different media• Media service	When necessary



rights declarations and national rules. Fintraffic is not aware of any cases in which our operations would in any way conflict with the UN or ILO principles.

Fintraffic has a Code of Conduct that it follows in its business operations. According to our Code of Conduct, we comply with the Finnish and international legislation applicable to us, our own guidelines and the Code of Conduct. The Code of Conduct helps us choose the right course of action when there is no rule or guideline, or its contents are unclear. By acting honestly, responsibly and ethically, we deserve the respect and trust of our partners and stakeholders, build a positive corporate culture and image, and ensure our attractiveness as a good employer. As a customer and procurer, we assume our responsibility and also require our service providers and other business partners to act honestly, ethically and responsibly.

We do not accept corruption. We do not accept or provide gifts or hospitality to derive unfair benefit or advantage. Nor do we give the authorities anything with the kind of monetary value that could affect or appear to affect their impartiality. We do not make donations to or otherwise support political parties or other organisations or individuals that are part of the political system. If in connection with our work we receive gifts or hospitality from someone other than Fintraffic, we check with our supervisor whether we can accept the gift or hospitality and keep the gift. We

do not trade with parties that are unwilling to provide us with appropriate information about their activities and ownership.

Processes for engaging with affected communities about impacts (S3-2)

Practices for engaging with affected communities are described in the general section of ESRS and in SBM2 and SBM3 of S3.

Identifying impacts:

Material impacts, risks and opportunities affect different communities in the transport ecosystem, such as users, transport operators and society at large. They have been identified through a double materiality analysis and data collected from stakeholders.

Application of the policy:

Sustainability is integrated into Fintraffic's strategy and business operations. The company's stakeholder engagement officers coordinate contacts with stakeholders, bring their expectations and concerns to the Group's strategic planning and assess their impact on the business.

The task of the stakeholder engagement officer is to sound the expectations of the stakeholder in question and to bring the expectations, opportunities and risks related to the stakeholder into the Group's

strategy process and the double materiality analysis. In addition to engaging closely with the stakeholders, changes in stakeholder activities are monitored by means of media and online monitoring tools and surveys. Fintraffic has a whistleblowing channel, which can be found both on the company's intranet and external websites.

Fintraffic provides services in Finland. We operate in accordance with internationally recognised human rights declarations and national rules. Fintraffic is not aware of any cases in which our operations would in any way conflict with the UN or ILO principles.

Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3)

Fintraffic's processes to remediate negative impacts and address concerns raised by affected communities include:

- 1. Remediating grievances:**
The company has a whistleblowing channel through which stakeholders can raise their concerns. Each report is processed in accordance with the specified policy, but the monitoring of the effectiveness of follow-up measures has not yet been systematised.
- 2. Accessibility of channels:**
The whistleblowing channel is available on both internal and external websites. The instructions

and procedures related to the channel are public, and the channel is designed to be safe and protected against retaliation.

- 3. User trust and participation:**
Fintraffic regularly assesses whether potential users of the channel are aware of its existence and whether they trust it. There are also plans to develop mechanisms for ensuring its efficiency.

Taking action on material impacts on affected communities, and approaches to managing material risks related to affected communities (S3-4)

Sustainability is integrated into Fintraffic's strategy and business operations. Every year, we update the key impacts, risks and opportunities of our business operations (double materiality analysis). We manage risks as part of our risk management system. In 2025, the double materiality analysis will be integrated into the risk management system. This means that the risks posed by Fintraffic's operations to stakeholders and the risks posed by the activities of stakeholders to Fintraffic will be examined as part of the risk management process.

Our responsibility is divided into the responsibility for the environment (E), responsibility for people and communities (S) and responsibility for good governance (G). The objectives, measures and metrics related to these themes and responsibilities



for the management of corporate responsibility are described in Fintraffic’s Sustainability Programme document.

Our responsibility for the environment focuses on promoting carbon neutrality in our own activities and procurement. Our responsibility for people and communities focuses on ensuring a healthy, equal and competent personnel, promoting a safe workplace, promoting safe, smooth and environmentally friendly traffic, providing reliable and efficient services, and accelerating smooth cooperation between traffic sector actors, the growing data economy and developing services.

The impacts of Fintraffic’s services can be divided into direct and indirect impacts. Fintraffic monitors the impacts of its services on its stakeholders as part of monitoring the implementation of the strategy and the sustainability programme and by continuously developing its impact metrics, which are described in more detail in the company’s annual report. In addition, the company sounds stakeholders’ expectations of Fintraffic as part of its stakeholder activities.

As a state-owned company, Fintraffic emphasises openness in its operations. Our sustainability policy outlines: we promote trust, openness and responsible practices in all our partnerships.

Fintraffic’s sustainability programme is based on a double materiality analysis. The sustainability programme defines the measures that are planned

and being implemented to mitigate the risks and to pursue the opportunities in relation to stakeholders. The key measures are listed under each area of focus.

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S3-5)

In its sustainability programme, Fintraffic has defined objectives, measures and metrics based on a double materiality analysis for its key areas of responsibility. Deadlines have been set for the actions. The measures will reduce negative impacts on affected entities and advance positive impacts.

Fintraffic will develop stakeholder-specific management and target-setting processes during 2025.

Theme	2025 target	2030 target	Key actions in the development of traffic management and digital services
Promoting safe, smooth, and environmentally friendly traffic	Systematic advancement of strategic projects in traffic management and digital ecosystem services.	World-class traffic management services and digital ecosystem solutions accelerate Finland’s development as a leader in safe, smooth, and low-emission transport and logistics. In addition, they support accessibility across Finland and its regions.	<ul style="list-style-type: none">• MROT, FINEST, Airspace 2027• Digirail, increased automation in rail traffic management, and safety improvements• Smart Road, lifecycle management development, data-driven decision-making• Future VTS, eLogistics, eInfrastructure• Electronic consignment notes, digital twin development, application of data analytics and AI• Ecosystem development
Ensuring societal preparedness and the operational reliability of transport services	Ensuring societal preparedness and the operational reliability of transport services, along with the implementation of related contingency plans.	Ensuring societal preparedness and the operational reliability of transport services	<ul style="list-style-type: none">• Preparedness measures for different modes of transport (Strategy 2024–2028)
Ensuring societal preparedness and resilient, reliable transport services	Achieving the efficiency targets of the Group and air traffic operations, and enhancing service development in the sector through digital ecosystem services.	World leading traffic management and digital ecosystem services enhance the efficiency of transport and enable the market to develop effective, innovative solutions for the industry.	<ul style="list-style-type: none">• Development of traffic management services in line with the strategy• Development of digital ecosystem services• Advancement of the digital twin• Development of electronic consignment notes and travel data
Facilitating smooth collaboration across the transport sector and driving the growth of the data economy market and export opportunities	Increasing the impact of the transport data ecosystem and export cluster.	Fintraffic is Finland’s leading and most trusted provider of traffic data and the primary integrator of the national traffic situation overview.	<ul style="list-style-type: none">• Development of traffic management services in line with the strategy• EU electronic consignment notes• Ecosystem and export cluster• Integration of municipal data into the National Access Point (NAP)• Development of the digital twin• Traffic data analytics and the use of artificial intelligence



S4 Consumers and end-users

Policies related to consumers and end-users (S4-1)

Fintraffic's policies affecting consumers and end users are based on the Code of Conduct, Supplier Code of Conduct and management systems adopted by the company's Board of Directors.

The aim of these policies is to promote human rights and strengthen ethical practices. The policies cover all consumer and end-user groups. Fintraffic's strategy aims to provide safe, smooth and environmentally friendly traffic services that directly benefit end users.

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

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

maintaining the kind of rail, air, road and maritime traffic as it is today.

Services help significantly reduce the harmful impacts of traffic by means such as:

- accelerating the development of new travel and logistics services through digitalisation and a common set of rules and practices for the sector;
- maintaining and sharing a real-time situational picture of traffic;
- optimising routes and speeds to combat congestion and reduce emissions through traffic management services;
- improving the flow of information to consumers to prevent disruptions;
- enhancing the attractiveness of public transport, including by reducing the impact of disruptions.

Communication on policies

Engagement with people in Fintraffic's own workforce is discussed in more detail in section S4-2.

Development of the operating model

By 2025, Fintraffic intends to develop processes for managing the material impacts, risks and opportunities related to consumers and end users. The operating model will include methods for assessing the effectiveness of the policies.



Fintraffic supports the principles of the UN Global Compact on the environment, labour rights, human rights and anti-corruption.

Processes for engaging with consumers and end-users (S4-2)

At the moment, Fintraffic does not have general processes that cover all consumer and end user groups. Fintraffic has a digital service management and development process for end users’ digital services.

Planned actions:

- to build a comprehensive operating model for engagement purposes by 2025;
- to use existing solutions, such as the Feedback Channel and the whistleblowing channel, as the basis for the process.

Processes to remediate negative impacts and channels to address concerns of consumers and end-users (S4-3)

Current solutions such as the Feedback Channel (<https://www.palautevayla.fi/>) and the whistleblowing channel, provide mechanisms to address consumer and end-user concerns. The Feedback

Channel is a nationwide advisory service for roads, railways and waterways, provided by Fintraffic in collaboration with the Finnish Transport Infrastructure Agency and regional Centres for Economic Development, Transport and the Environment. The service is intended for all users of state-owned transport routes.

On the Feedback Channel website, people can give feedback, ask questions and make development proposals and submit notifications related to state-level routes. The page also allows people to follow feedback and notifications concerning their own area. If the feedback is related to the maintenance of roads maintained by the municipality (e.g. streets), people must contact the municipality or city concerned.

Additional information on the whistleblowing channel is given in section G1-1.

However, these mechanisms do not constitute a comprehensive operating model.

Development targets for 2025:

- to build a comprehensive operating model to remediate negative impacts;
- to include efficiency monitoring and reporting in the mechanisms.

Actions in relation to material risks and opportunities (S4-4)

Fintraffic does not yet have a systematic process for managing risks in relation to consumers and end users and pursuing the opportunities.

Development targets:

- An operating model for managing material risks and opportunities will be created in 2025.
- The operating model will be used to regularly assess the effectiveness of risk management.

Targets related to managing material negative impacts and advancing positive impacts (S4-5)

At the moment, Fintraffic has no defined targets related to managing negative impacts, advancing positive impacts, and managing material risks and opportunities.

Actions

Fintraffic intends to define these targets and develop processes that support them as part of the 2025 operating model.

Conclusions and outlook

Fintraffic is committed to improving the consideration of consumers and end users in its sustainability action. Future measures will focus on building comprehensive processes that:

- manage risks and opportunities in relation to consumers and end-users.
- remediate negative impacts and advance positive impacts.
- improve communication and cooperation with consumers and end-users.



Theme	2025 target	2030 target	Key actions
Prevention of hazardous situations, reduced travel times and congestion, and lower travel emissions	Advancing strategic projects in traffic management and digital ecosystem services in a planned manner.	<div>World-class traffic management and digital ecosystem services accelerate Finland’s position as a leader in safe, smooth and low-emission transport and logistics.</div> <div>Fintraffic’s consumer services are the most popular in Finland.</div>	<div>• MROT, FINEST, Airspace 2027</div> <div>• Digirail, automation and safety in rail traffic management</div> <div>• Smart Road, lifecycle management, data-driven decision-making</div> <div>• Future VTS, eLogistics, eInfrastructure</div> <div>• Fintraffic’s own digital services development</div> <div>• Electronic consignment notes, digital twin development, use of data analytics and AI</div> <div>• Ecosystem development.</div>
Minimizing disruptions caused by traffic management services	Ensuring societal preparedness and the operational reliability of transport services, along with the implementation of related contingency plans.	Taking responsibility for societal preparedness and resilient transport services.	<div>• Preparedness measures by transport mode (Strategy 2024–2028)</div> <div>• Traffic management development actions (Strategy 2024–2028)</div>
Improving the conditions for public transport	Development of travel data, development of ecosystem collaboration and industry cooperation.	<div>World-leading digital mobility ecosystem services streamline transport, support the market in creating efficient and customer-friendly solutions, and enable national and regional accessibility.</div> <div>Finnish public transport information services are the most advanced in the world.</div>	<div>• Development of digital mobility services</div> <div>• Collection of SoTe travel data</div> <div>• Operation of the transport data ecosystem</div>
Promoting new, innovative and cost-effective services in transport	Enhancing the impact of the transport data ecosystem, improving the knowledge base, and promoting the accessibility of transport services (incl. accessibility data).	The world’s most effective Finnish transport data ecosystem enables the most efficient service development.	<div>• Operation of the transport data ecosystem</div> <div>• Fintraffic’s data services</div> <div>• Development of travel data including accessibility information</div>



G1 Business conduct

Management, metrics and targets of impacts, risks and opportunities (ESRS 2 IRO-1)

Risks are mapped for each organisation by business, service and function, covering all 43 business locations. Currently, the risks and opportunities are assessed based on risk lists created by the authorities and Fintraffic itself, information based on experience, and observations made by customers and partners. Reporting to Fintraffic's Management Team and Board of Directors is carried out twice a year in accordance with the requirements of the corporate governance model. The plan is to prepare and adopt a more detailed and systematic operating model in the first quarter of 2025.

Business conduct policies and corporate culture (G1-1)

To ensure the group's unity, the whole Fintraffic Group follows a common management system. The decision-making and management of the Group comply with the Limited Liability Companies Act, Fintraffic's Articles of Association and the common guidelines and principles defined in these Rules of Procedure.

Since its establishment, Fintraffic has had a Code of Conduct adopted by the Board of Directors, which is updated as necessary.

Fintraffic has set policies, such as procurement policy, sustainability policy, risk management policy and safety policy, to guide its operations.

In 2024, the company launched a project to develop its corporate culture in accordance with the strategy programme. The project aims at establishing a uniform corporate culture and promotes commitment to it. The measures include:

- Working as an Expert at Fintraffic programme;
- student exchange programme;
- shared values and remuneration schemes;
- Mental Health Friendly Workplace certificate;
- Fit for Future Fintraffic project;
- supervisor training and coaching.



Insights on how to develop the corporate culture have been collected from the employees through an intranet survey. In autumn 2024, workshops were organised to determine further measures. Concrete results include designing a “cultural manual” and engaging the management in the targeted company culture.

Whistleblowing channel

To remediate negative impacts and address community concerns, Fintraffic has a whistleblowing channel in place through which employees and external stakeholders can raise their concerns. Every report is processed in accordance with the procedure laid down by law.

The whistleblowing channel is available on both internal and external websites. The instructions and procedures related to the channel are public, and the channel is designed to be safe and protected against retaliation.

Fintraffic regularly assesses whether potential users of the channel are aware of its existence and whether they trust it. The Code of Conduct prohibits any retaliatory action against whistleblowers. Information on the whistleblowing channel is available on internal and external websites.

The operating principle, guidelines and training related to the whistleblowing channel will be developed in 2025.

A total of 26 incidents have been reported to Fintraffic through the whistleblowing channel. The incidents have not been related to misconduct but have mainly concerned inappropriate behaviour.

Cost efficiency

One of Fintraffic’s key sustainability targets is to continuously improve the company’s cost-efficiency. The benefits from streamlining generated by rail and road traffic management and vessel traffic services are passed in full by Fintraffic to the Finnish Transport Infrastructure Agency, which receives the services it needs at a lower unit cost. In air navigation services, the efforts to improve efficiency are linked to the performance plans drawn up in accordance with EU regulations, through which all air traffic operators can enjoy the benefits of enhanced efficiency.

Fintraffic aims for a EUR 30 million increase in operational efficiency in the provision of road, rail and maritime traffic management services between 2023 and 2028. In 2023–2024, the company verified a cumulative efficiency improvement of EUR 15 million through increased degree of automation, more efficient traffic control services and cost-efficient procurement. Efficiency has also been improved by leveraging the economies of scale, as the company has been able to provide more extensive service packages without the costs having risen in the same proportion.

Due to the sanctions imposed because of the Russian war of aggression, the traffic volumes in air navigation have fallen short of the RP3 performance plan forecasts that guide the setting of efficiency targets. So, in 2024 the targets were not met in terms of unit cost development. The actual costs were below the costs described in the performance plan. The RP4 performance plan targets for enhancing efficiency in air navigation for 2025–2029 will probably be confirmed at the EU level in 2025.

Management of relationships with suppliers (G1-2)

Fintraffic has assigned contract managers who are responsible for supervising that the supplier’s terms of contract are met during the contract period so that the objectives and benefits of the contracts are realised. Regular training is provided for contract managers, but no specific incentive schemes are used. During 2025, the aim is to specify how to meet the mandatory minimum requirements for sustainability, for example, by introducing a Code of Conduct that takes account of the sustainability requirements for supplier selection in public procurement.

Currently, we implement responsibility and sustainability in our public procurement based on obligations arising from the Public Procurement Directive and the Act on Public Procurement and Concession Contracts: we take into account the

mandatory and discretionary exclusion criteria in competitive tendering processes that exceed the EU threshold value and, where applicable, the national threshold value. In addition, we monitor all procurements to fight against the grey economy by requiring compliance with the obligations laid down in the Act on the Contractor’s Obligations and Liability when Work is Contracted Out and their verification regardless of whether the Act is applicable or not. In addition, established environmental criteria concerning the object of the procurement are used as requirements in individual procurements where this is reasonable.

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

Since its establishment, Fintraffic has had its own Code of Conduct. According to the Code, the company has zero tolerance for corruption. An anti-corruption management model and relevant instructions in more detail will be created in 2025. The management model will include, for example:

1. procedures for preventing, detecting and processing corruption and bribery;
2. responsibilities and roles;
3. the independence of investigators and the investigation committee;
4. process for reporting the results to the management;
5. training required.



Training will be targeted for areas at risk. The management model will define the scope, coverage and target groups of the training programmes.

Confirmed cases of corruption or bribery (G1-4)

In 2024, a total of 11 reports were submitted through Fintraffic’s whistleblowing channel. During the 2024 reporting period, Fintraffic became aware of no suspected or confirmed cases of corruption or bribery. No convictions or fines were issued for violations of anti-corruption or anti-bribery laws. All reports submitted via the whistleblowing channel are presented to the Audit Committee of the Board in an anonymized and aggregated format.

Political influence and lobbying activities (G1-5)

Fintraffic provides its expertise to decision-makers, thus aiming to improve the quality of public decision-making. The company does not provide any financial support to political parties and, in accordance with its Code of Conduct, does not otherwise support political parties or other organisations or persons belonging to the political system.

During the financial year 2024, Fintraffic promoted the development of regulations related to traffic management and traffic data and provided

information and views on the promotion of projects related to the same themes. Such projects include promotion of the transport data space, the Digirail project, the airspace reform and the national implementation of the ITS Directive. If implemented, the projects would support the implementation of Fintraffic’s strategy and the building of an even safer, smoother and more environmentally friendly traffic system.

Fintraffic complies with the legislation related to the Transparency Register and reports on its lobbying activities to the reporting system maintained by an authority (National Audit Office of Finland) twice a year. The CEOs of the Group and subsidiaries are responsible for supervising the company’s lobbying activities.

Payment practices (G1-6)

The average time it takes for Fintraffic to pay the invoice from the date on which the calculation of the contractual or statutory payment term begins is 22 days.

As a rule, Fintraffic complies with the general terms and conditions drawn up for public procurement, such as JYSE 2014 and JIT 2015. The standard payment term is 21 days for all suppliers. Fintraffic Air Navigation Services Ltd’s standard payment term is 30 days for all suppliers.

The percentage of payments in accordance with the standard terms of payment is 81at Fintraffic Air Navigation Services Ltd and 63 in other Group companies.

The calculations cover 100% of Fintraffic’s external suppliers. Intra-group invoicing has been excluded from the calculation.

Fintraffic currently has no legal proceedings pending due to late payment.



FINTRAFFIC, P.O. BOX 71, 00241 HELSINKI, FINLAND