

Sustainability Report 2023

accoun⁺or

SERVICE BUSINESS



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01 Accountor – forerunner in financial and HR management

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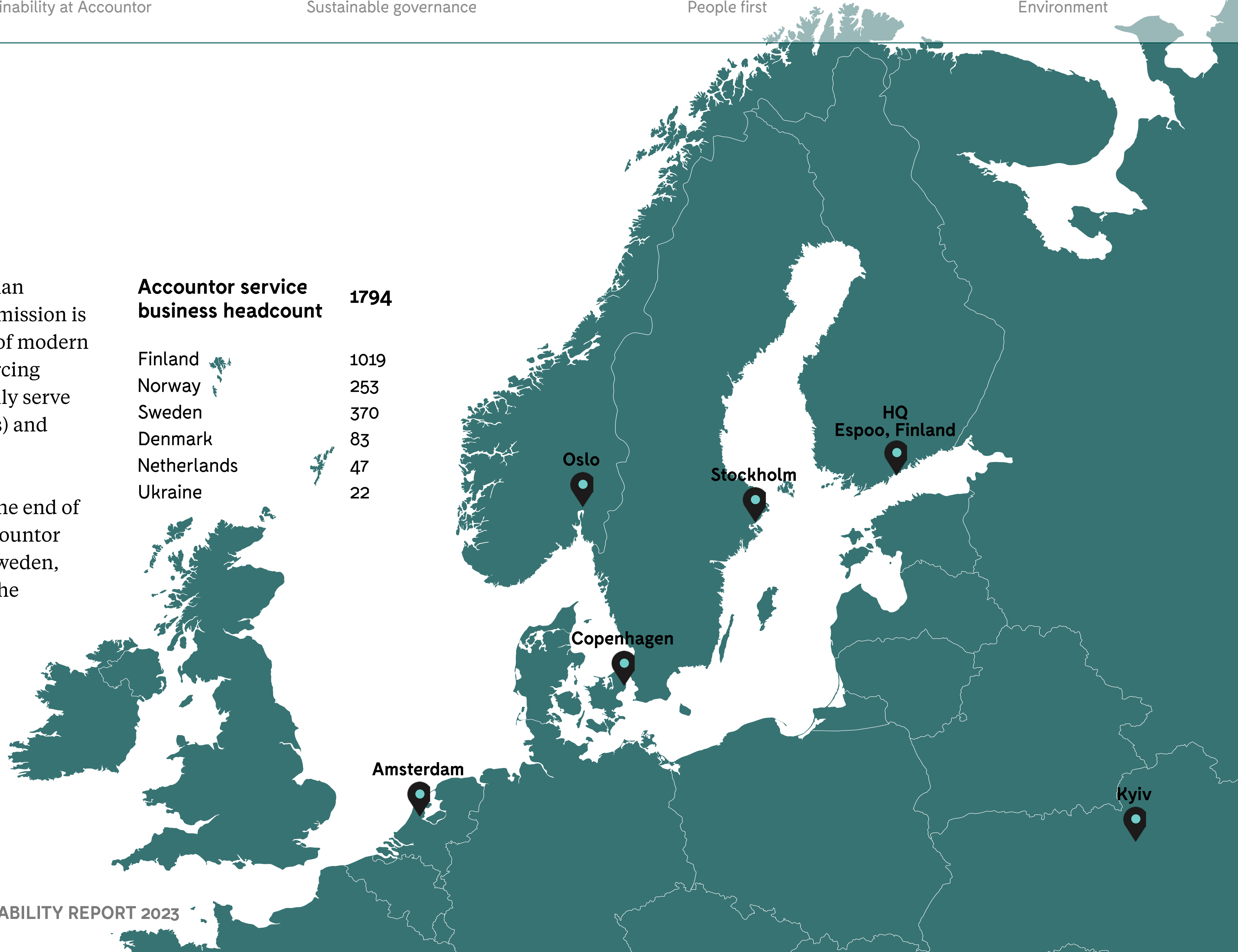
1.1 Organisation

Accountor specialises in financial and human resources (HR) management services. Our mission is to help our customers use the possibilities of modern ways of working, digitalisation and outsourcing services in their everyday work. We primarily serve small and medium-sized enterprises (SMEs) and smaller corporates across the Nordics.

Our headquarters is in Espoo, Finland. At the end of 2023, we had nearly 1800 employees in Accountor service business across Finland, Norway, Sweden, Denmark, Netherlands, and Ukraine with the largest presence in Finland.

Our strategic priorities are based on our values and mission as well as where we see the greatest risks and opportunities for our business.

Accountor service business headcount	1794
Finland	1019
Norway	253
Sweden	370
Denmark	83
Netherlands	47
Ukraine	22



Accountor's mission

Accountor's mission is to help its customers benefit from the new world of financial management, human resources management and development.

Accountor's values

Respect is a principal attitude towards other people. *Trust* means professional attitude, long-term delivery, skills, and personal commitment (going the extra mile). *Courage* is something we want to foster in the company, to stretch out

of the comfort zone. *Future* is the place where we will live for the rest of our lives.

Products and Solutions

Our financial and human resources related services and solutions support companies and their employees to thrive. Thus, we contribute to creating truly sustainable prosperity within our regions. Our biggest purchases are linked to our people, as well as in the development of our services.

Financial services

- Accounting services
- Financial consulting services
- Legal and tax advisory
- Debt collection
(in the Netherlands only)

HR services

- HR and Payroll services
- Consulting and developing HR work and management
- Training and coaching

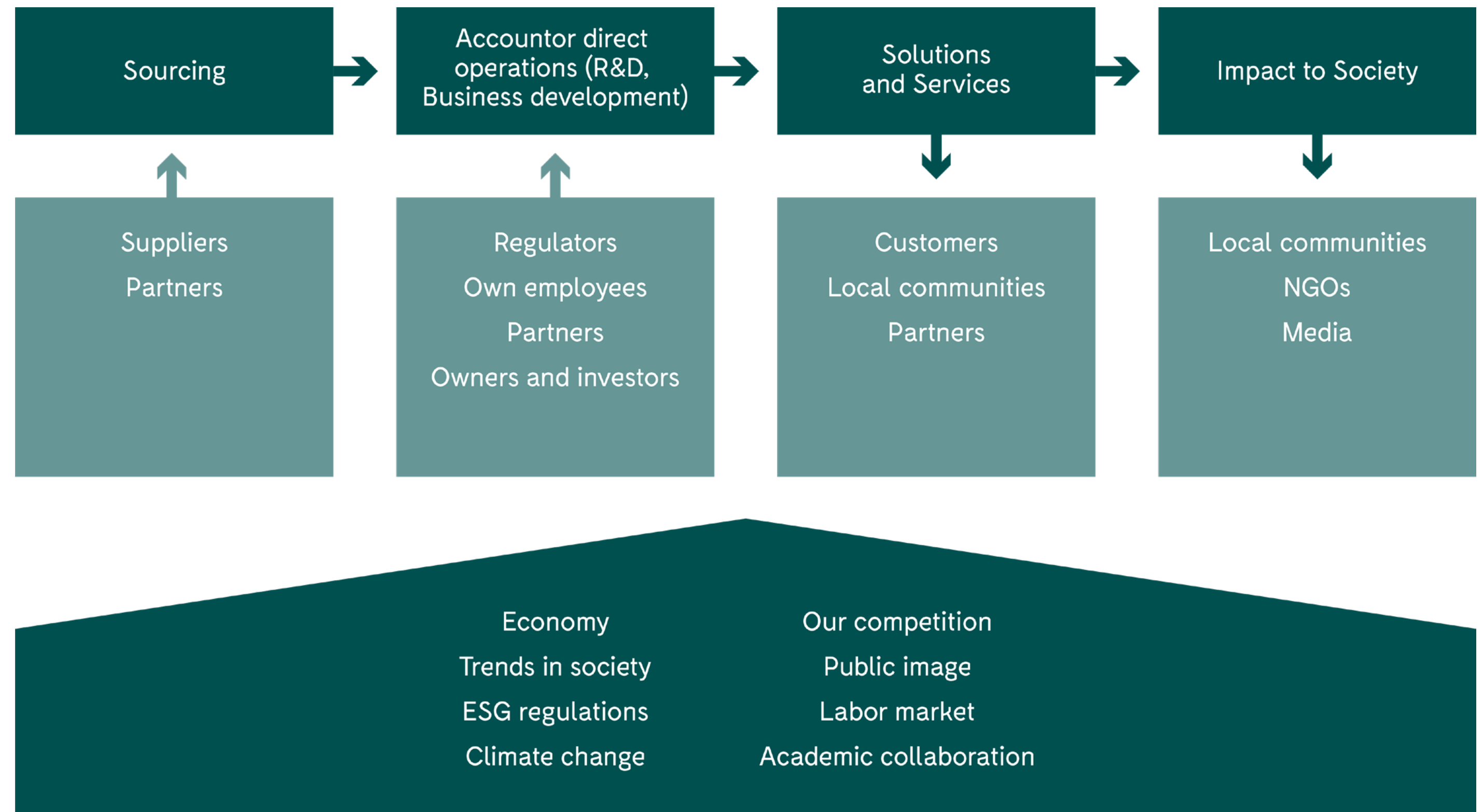


Value chain

We create value in a sustainable way for our customers, our employees and the society in which we operate. As a company, we may cause impacts either through our own activities and operations, or through our business relationships.

Especially information security, privacy, business ethics, anti-corruption, and human rights are crucial topics throughout our value chain. We continuously work to develop and improve our services to best serve our customers and maintain competitive advantage in our field. Our investment in research and development for opportunities in innovation is integrated in our operational budgets and are not a standalone line item.

In addition to our core business, we partner with several companies in different areas to complement our service and solution offering.



1.2 Sustainability year 2023

Accountor's strengths continue to be in business ethics, labour and human rights. In 2023, our sustainability actions created visible progress especially in the environmental area. As a result of our improvement, Accountor was awarded a Silver EcoVadis Medal for the first time in an external assessment.

Future-oriented sustainability management

In 2022, Accountor set long-term sustainability priorities and targets until the end of 2026. They are based on our stakeholder expectations revealed in the materiality assessment. In this report we can measure our progress against strategic long term sustainability goals.

Other way of measuring our success was also introduced in our renewed engagement survey where we added ethics and environment related questions.

During 2023 Accountor became participant of the Global Compact. Accountor employees engaged in the activities during the United Nations' Sustainable Development Goals (SDG) Flag Day. Based on input of our key stakeholder group employees, our work on the SDG 10 Reduced Inequalities is made more visible already in this report.

To enhance our sustainability management competence, we recruited a Sustainability Lead who started to drive our sustainability work forward in the beginning of 2024.

Strengthening people's wellbeing and abilities

Accountor's business is enabled by people, and we want to ensure fair treatment and wellbeing across our operational areas. To increase Accountorians' safety and wellbeing at work, a support service for mental and practical help in case of harassment was introduced. The help is available for both work and free time situations.

Ensuring inclusive quality education and promoting lifelong learning opportunities for employees continued in 2023 with an average of 19 hours of recorded training per employee.



Developing sustainability of the supply chain

To ensure that our suppliers follow high level of sustainability and ethical principles in their operations, we conducted a sustainability survey for our biggest suppliers and all the new suppliers. In addition, we obligated all our new suppliers to approve our Code of Conduct for Suppliers as a prerequisite of our collaboration.

Supporting customers' sustainability progress

To support our customers to progress with their sustainability activities, Accountor offers several services and solutions. In 2023, we also offered knowledge improvement opportunities both for our customers and employees about the basics of sustainability for companies and on our abilities to support companies to fulfil their sustainability requirements.

Focus on reducing carbon emissions

Accountor has set an ambitious target to reduce its carbon emissions by 10% per a full-time employee (FTE) annually.

As our biggest carbon emissions are accumulated from our premises and commuting, we continued to reduce carbon emissions by streamlining office space and increasing the proportion of renewable energy.

Coping with Ukraine war effects

As our colleagues and the people in Ukraine continued to suffer from the war in 2023, we continued to provide support to our employees and their families who were impacted by the war throughout the year in various ways. In addition, Accountor made donations through the Red Cross to help the victims of the war and flood crisis in Ukraine.

Furthermore, we helped our customers to comply with sanctions and mitigate challenges caused by the inflation resulting from the war.





Niklas Sonkin
President and CEO
of Accountor Group

1.3 President and CEO's forewords

Sustainability is an integral part of our daily operations at Accountor, and we take it very seriously. We take pride in treating people and handling our business in a sustainable way – now and in the future. This report not only lists the ways but describes actual results that happen in our operations every day.

I am excited that we improved our sustainability rating last year from Bronze to Silver EcoVadis Medal. It is noteworthy that the improvement was driven especially by actions and visible progress in the environmental area: we reached an eight percent % reduction in the CO₂ emissions per employee last year. Accountor's

strengths thus continue to be in business ethics, labour and human rights and now also in the environmental area.

Through our regular customer and brand surveys, I am happy to learn that Accountor is valued as a reliable, trusted, and professional business partner. From the results it is also evident that sustainable business conduct is becoming increasingly important for our customers, when evaluating new partners. In addition, I am satisfied that we are progressing in the development of solutions and services that support our customers to fulfil the future sustainability requirements more easily.

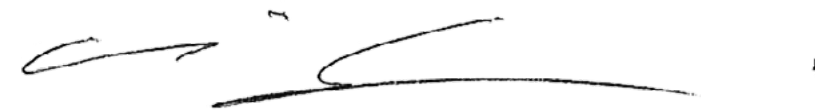
In this era of ever-increasing cyber risks, protecting and securing data and privacy remains as one of Accountor's focus areas. We are committed to providing safe and trustworthy services to our customers. We require our suppliers to follow Accountor's high standards not only in information security and data protection but also in other ethical governance and sustainability matters. By increasing the engagement of our partners and suppliers we can strengthen our business ecosystem.

Despite the prolonged turbulent world situation, I am pleased that Accountor accomplished successful business results in 2023. In general, we have worked constantly towards our goals by growing both organically as well as through strategic acquisitions in Finland, Sweden and Denmark.

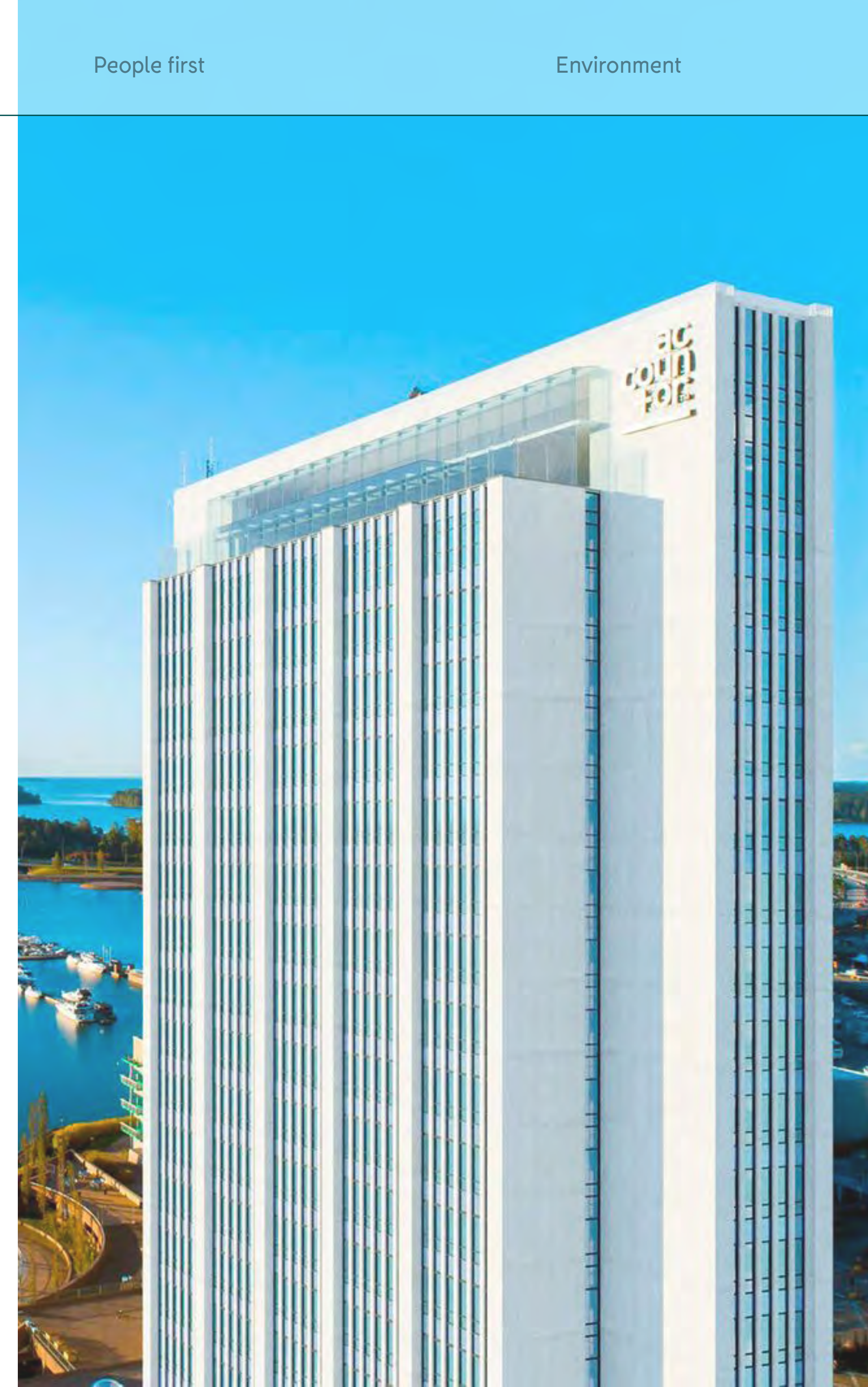
I would also like to highlight that Accountor continued to be perceived as an attractive employer. Both students and business professionals voted us as an attractive employer. Our People First principle and its activities promoted inclusive as well as full and productive employment for nearly 1 900 employees

and on average over 150 external employees last year. In addition to Accountor's high ethical conduct, Accountorians showed their compassion by using more than 200 hours of work time in voluntary work.

With pride, I present this report on Accountor's systematic work in developing our business in ways that have a positive impact on the world around us. As we all learn to improve, I want to thank all of our stakeholders at Accountor: customers, business partners and Accountor's a+ team members for the consistent work for growing our efforts further. I am convinced that our targets and commitments to the environment, business, customers and people make us a Group that offers exciting opportunities and perspectives for all our stakeholders, who we invite to join our journey.



Niklas Sonkin
President and CEO of Accountor Group



1.4 Stakeholders

At Accountor we work closely with each of our key stakeholders: putting people first, actively communicating with customers, meeting with our most significant investors regularly, and fostering strong relationships with our key suppliers.

People

At Accountor we operate a People First strategy recognising that our people are our most significant asset. Therefore, we consistently strive to put people first. In addition to Accountorians, we encourage the same values for our customers, partners and suppliers.

All employees and leaders at Accountor are asked to give their evaluation and feedback annually in our People First survey. The survey results are handled at team level, and each team creates a development action plan based on the feedback. At the group level, results that indicate a need for development are transferred to a general development plan. In general, both our employee engagement index and eNPS are at a good level. The People First section in this report describes how we develop our

people's competencies, handle our labour management, and promote equality, inclusion, diversity, and wellbeing.

We engage our people inclusively in all our regions by communicating actively in the local language in intranet, organising quarterly information sharing events and providing both open and anonymous feedback channels and surveys. Accountor employees are engaged in sustainability work through our intranet page, minimum monthly news articles as well as sustainability-themed quarterly review about our ESG (Environmental, Social and Governance) plans and targets at least once a year.

Owners and investors

Accountor's most significant investors include Vitruvian Partners LLP with a majority shareholding, Sponsor Capital, and private shareholders. Accountor Group holds general board meetings at least six times a year. Accountor's Board of Directors discusses sustainability targets and reporting at least twice a year. The discussions are used as the basis for Accountor's sustainability work.



In addition, we complete Vitruvian Partners LLP's and Sponsor Capital's sustainability questionnaires annually. These questionnaires require disclosing over the Group's sustainability performance in response to the investor's key sustainability focus areas and key performance indicators (KPIs).

Government, organisations, associations and NGOs Accountor is a member of local chambers of commerce to promote the development of small and medium-sized companies in our operating areas. We also support sustainable governance and healthy development of local business by participating in financial administration associations in the countries we operate.

Accountor's Board of Directors monitors all memberships regularly from competition law and antitrust perspective. To ensure our service compliance, we collaborate with our operating countries' tax administration and continuously monitor EU-wide legislation.

Customers, end-users and local communities

Accountor exists for its customers: to help them and their employees through our services. We value our customers'

opinions and actively seek their feedback through regular customer surveys. Moreover, we believe in maintaining an ongoing dialogue with our customers through convenient online services and active customer communication.

Furthermore, during the winter holidays we engage our customers to select a suitable annual charity cause together with our personnel. In the Customers' wellbeing chapter of this report, we describe further steps we take to support economic growth and decent work for all our customers and their employees.

Suppliers

At Accountor we work closely and maintain strong relationships with our key suppliers. All suppliers are required to comply with Accountor Code of Conduct for Suppliers with specific requirements for suppliers, including ESG topics.

We perform due diligence on all major new suppliers as part of a third-party audit framework. In addition, we are committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact and expect our suppliers to respect human rights and share these values.



02 Sustainability at Accountor

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2.1 Summary about sustainability at Accountor

Working in a sustainable manner is the core of our business. At Accountor, sustainability primarily means confidentiality, secure handling of information, ethical operations, and putting our people first.

We conduct and develop our business, serve our customers, invest and give back to the communities in which we and our customers live and work, in a sustainable way. We encourage our employees, customers and other stakeholders to share our commitment.

Accountor consistently increases contribution to sustainability as stated in our Environmental, Social and Governance

(ESG) Policy. We continue to develop our sustainability towards our sustainability targets according an annual Accountor Environmental, Social and Governance (sustainability) Action Plan.

The digital business that Accountor conducts and develops is one way to improve sustainability: it increases efficiency and is a path to a paperless world. In addition, our people work towards our sustainability targets in their daily work by, for example, handling our customers' information in a secure way, encouraging companies to use the digital services in our product portfolio, and selecting suppliers and partners that work in a sustainable way.

Digitalisation

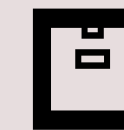
Accountor's products and services fast-track our customers' digitalisation of processes. By doing so, together we are able to minimise the negative impact on the environment that the paper-based systems of the past have, such as emissions. This is achieved through three key processes:



Digitising invoices in purchasing and revenue cycle



Digitising HR processes



Digitising archive processes

Efficiency

Accountor's products and services make our customers more efficient, reducing the resources required for the same job.

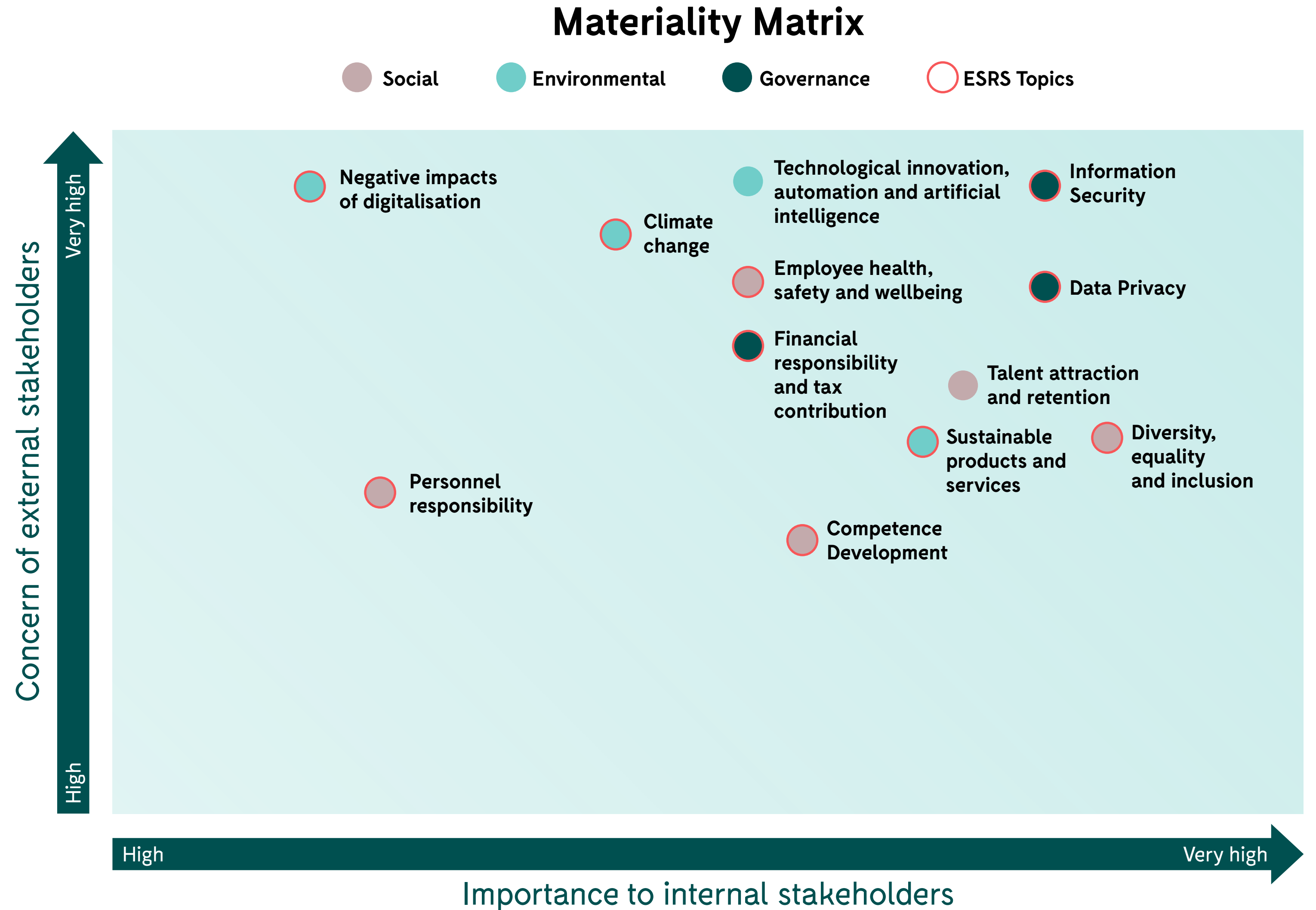


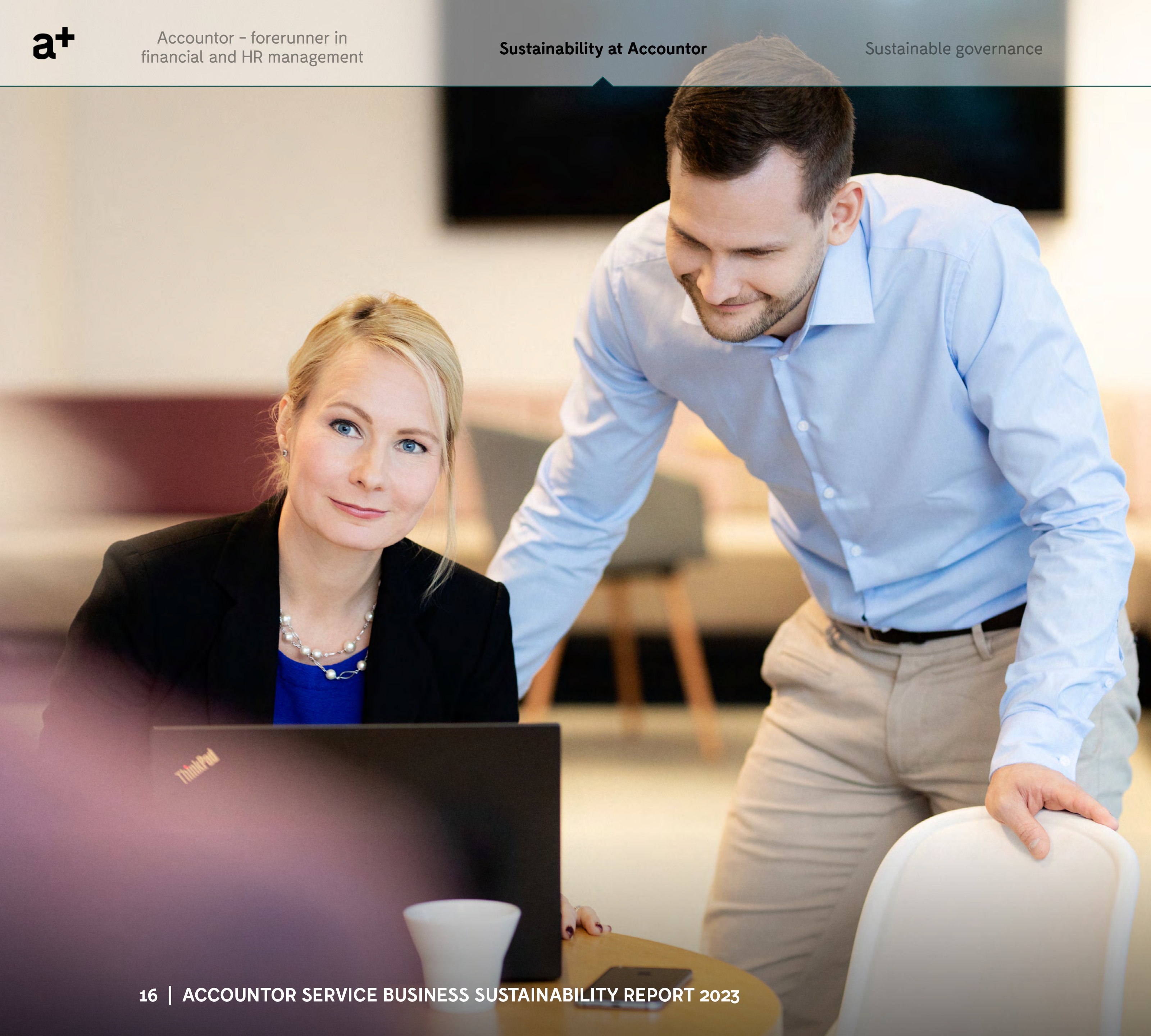
Efficient processes and solutions

2.2 Sustainability focus areas

2.2.1 Material topics

We have conducted a materiality assessment by engaging our key internal and external stakeholders. Based on the materiality analysis, we recognised twelve key topics that are most relevant and impactful when considering Accountor’s sustainability. We emphasise how Accountor’s sustainability topics link with the upcoming European Sustainability Reporting Standards (ESRS) topics.





In 2023, we advanced our materiality work to the direction of emerging standards of the European Corporate Sustainability Reporting Directive (CSRD). We engaged key internal personnel to give input for our preliminary Double Materiality work. The primary task was to identify the sustainability issues, risks and opportunities that are most material to us and our stakeholders.

As a preliminary result, the material European Sustainability Reporting Standards (ESRS) topics for Accountor are presented in the Double Materiality table. It represents how the material topics correlate to the potential or actual negative and positive impacts. In the table we also recognise potential and actual financial risks and opportunities.

Double materiality table

Topic ESRS	Topic Accountor	Theme	Potential or actual positive impact	Potential or actual negative impact	Potential or actual financial opportunity	Potential or actual financial risk
Climate change: energy and mitigation	Climate change	Environmental	Provide tools and services that help customers to manage their CO ₂ emissions. Accountor way of hybrid working.	Accountor Scope 1-3 CO ₂ emissions	Tools and services to help customers CO ₂ emission reporting. Balanced customer-base including climate change resilient businesses.	Increasing costs imposed by regulation or customer business affected by climate change.
Own workforce	Competence development, DEI, Employee health, Safety and Wellbeing	Society	Developing financial and human resource management competencies. Providing safe workplace and supporting employee wellbeing on and off work. Offering equal opportunities to diversified workforce. Access to wider talent pool to grow competencies.	Workload impact on well-being. Competences becoming obsolete in market disruption. Increased inequality via rewarding or limited career and development opportunities.	Competence development enables providing higher value services and solutions to customers. High wellbeing, employee retention and attraction decreasing cost.	Employee churn growing costs and affecting negative on service availability and affecting negative on client churn.
Consumers and end users	Sustainable products and services, Technological innovation, Automation and Artificial Intelligence (AI)	Society	Accountor services and solutions in securing end-user data. GDPR	Exposed data or non-protected data	Accountor provides tools and services that help customers to manage their financial and personal information in a secure way.	Potential fines related to privacy and infosec cases. Impact to customer base.
Business conduct	Business ethics and anti-corruption, Data privacy and Information security, Financial responsibility and tax contribution.	Governance	The role of accounting in monitoring and preventing bribery and corruption. Increased company reputation and benefiting the society through credible services.	Negative impacts regarding potential corruption and bribery within customers. Damaged company reputation.	Accountor offers a tool to do financial reporting according to law. Added sales.	Potential fines for enabling bribery via our solutions. Data breaches and potential lost customers.



2.2.2. Sustainability priorities and targets

Our strategic priorities and targets for our sustainability work are set based on our materiality assessment results. Our focus is on **employee wellbeing and digital competence development**, developing **safe and compliant governance** and developing **low carbon services and products**.

Accountor service business sustainability priorities:

Governance

- Protect and secure data and privacy of financial and people management administration
- Promote good governance and transparent collaboration with authorities
- Make sustainable positive impact on economic welfare and society

Environmental

- Innovate and develop low-carbon financial and human resources management services and systems
- Use all resources mindfully and avoid waste in digitalised hybrid way of working

Social

- Grow employee wellbeing and people management capability
- Develop competences to ensure benefit and inclusion of digitalisation and automation
- Provide sustainable employment and equal career opportunities for diversified workforce
- Drive personnel responsibility and protect human rights

Sustainability targets since 2022:

1. Employee engagement total index above 4/5
2. Average training /employee 7 hours/year
3. 0 material* breaches or lawsuits regarding privacy
4. Top quartile ESG governance (Ecovadis silver rating)
5. CO₂ emissions/FTE -10% annually from 2020–2026

* the Sustainability Account Standards Board's ("SASB") definition of materiality states, "[ESG] issues that are reasonably likely to impact the financial condition or operating performance of a company and therefore are most important to investors.

ACCOUNTOR SERVICE BUSINESS SUSTAINABILITY TARGETS 2024

Social

1. Employee engagement total index above 4/5

✓ **Achieved 2023:**

We reached level 3.91/5 or total index 72% total employment engagement index with renewed survey content. (People first survey)

✓ **Commitment 2024:**

Reach total engagement index of 74% during 2024 enabling reaching index level 78 by 2026.

2. Average training / employee 7 hours/year

✓ **Achieved 2023:**

We exceeded the target to train our employees and trained them on average 19 hours during 2023. (2022: 10)

✓ **Commitment 2024:**

Continue to provide minimum 7 hours training/employee on average during 2024.

Governance

3. 0 material breaches or lawsuits regarding privacy

✓ **Achieved 2023:**

We reached 0 material * breaches or lawsuits regarding privacy of the data.

✓ **Commitment 2024:**

Zero material breaches as a result of systematic mandatory training and continuous process and tools development to mitigate breach risk.

4. Top quartile ESG governance

✓ **Achieved during 2023:**

We exceeded our target and were among top 20% of the Ecovadis rated companies

✓ **Commitment 2024:**

We aim to belong among top 15% of the Ecovadis rated companies.

Environmental

5. Cut CO₂ emissions/FTE -10% every year between 2020 and 2026

✓ **Achieved 2023:**

tCO₂ emissions / FTE decreased 8% in 2023, from 2,98 tCO₂/FTE in 2022 to 2,75 in 2023.

✓ **Commitment 2024:**

Continue implementation of renewable energy in our offices. Also expanding our Scope 3 calculations with adding more purchased services to the calculation.

We aim to decrease CO₂/FTE by 10% during 2024.

* the Sustainability Account Standards Board’s (“SASB”) definition of materiality states, “[ESG] issues that are reasonably likely to impact the financial condition or operating performance of a company and therefore are most important to investors”

SUSTAINABLE DEVELOPMENT GOALS

Based on these priorities and targets, we work towards the United Nation's Sustainable Development Goals (SDGs) where we believe we can make the most impact.

We tell about our sustainability work in more detail in the following sections dedicated to these themes and goals. In addition, we report our carbon footprint and the topics that we have identified as our biggest impacts on emissions in the *Environment* section.



4 QUALITY EDUCATION

SDG 4 - QUALITY EDUCATION

Chapter Competence development

Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

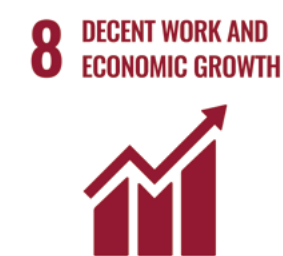


10 REDUCED INEQUALITIES

SDG 10 - REDUCE INEQUALITIES

Chapter People First

Reduce inequality within and among countries.



8 DECENT WORK AND ECONOMIC GROWTH

SDG 8 - DECENT WORK AND ECONOMIC GROWTH

Chapter Labour management

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



16 PEACE, JUSTICE AND STRONG INSTITUTIONS

SDG 16 - PEACE, JUSTICE AND STRONG INSTITUTIONS

Chapter Business ethics and policies

Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

2.3 Introduction of frameworks and commitments

Accountor's sustainability work is guided by our Code of Conduct and the principles of The Universal Declaration of Human Rights. We support the United Nations Global Compact and its Ten Principles.

Our Environmental, Social and Governance (sustainability) Policy is our guide to business operations and decision-making. It expresses the extent to which the policy commitments mentioned above apply to our activities and to our business relationships.

Our ESG Policy and practices provide a framework for other Accountor policies and practices, such as our Code of Conduct, Health and Safety Policy, Diversity Policy and environmental standards. We promote them as part of our Code of Conduct wherever we operate. In addition, we ensure that all Accountor personnel will receive information about these policies and practices with appropriate training and communication.

The ESG Policy ensures that Accountorians, our customers, and the communities in which we operate can trust Accountor in the long term.

WE SUPPORT



As our sustainability context we use:

- Universal Declaration of Human Rights
- United Nations' Global Compact and selected Sustainable Development Goals
- Legal requirements and the development of new sustainability legislation
- Benchmarking with industry peers and best practises.
- Corporate Sustainability Reporting Directive (CSRD) and its European Sustainability Reporting Standards (ESRS)



2.4 Managing sustainability at Accountor

Accountor's Leadership Team (ALT) members form Accountor's ESG Committee. Its objective is to improve Accountor's sustainability, increase our understanding about how Accountor value is impacted by environmental, social and governance issues, and lead the implementation of Accountor's ESG strategy and annual ESG Action Plan. The ESG Committee is also responsible for reviewing and approving all matters related to our sustainability work, including Accountor's material topics and the sustainability report.

Day-to-day management of sustainability governance was led in 2023 by the Chief Competence and Sustainability Officer (CCSO), supported by other members of the ALT.

Accountor Group's HR function was responsible for updating the ESG Policy and setting annual sustainability targets. At the end of 2023, Accountor decided to strengthen further the sustainability capabilities and recruited a Sustainability Lead for its services business.

The ESG Committee has reviewed and approved this 2023 report and will deliver it to Accountor's Board of Directors as part of annual ESG action plan reporting. Accountor's Board of Directors oversees Accountor's impact on economy, people and environment by monitoring ESG Action Plan execution and Accountor quarterly risk review. It also approves ESG Policy and ESG Action Plan.

2.5 Accountor ESG services

Accountor's services business helps customers to manage their financial and HR tasks and resourcing. We offer our services on-site and remotely. Our position is very closely linked with existing and upcoming ESG legislation and as an important partner for our customers to succeed in their ESG data management, performance and reporting. As Accountor service business' vision points out, 'We give our customers the power to succeed'.

This approach not only aligns with our environmental responsibilities but also positions us to capitalise on opportunities arising from the transition to a low-carbon economy, ensuring sustainable growth and long-term value creation for all stakeholders.

Environment

We focus on expanding our ESG knowledge in our customer base. Helping customers to identify the magnitude of their CO₂ footprint,

material flows and biodiversity impact through financial activities is one significant way for us to expand the know-how of our customers.

Social

Our consulting and developing services help you to solve the problems in HR work and management. Accountor's HR professionals help customers to manage people and employee related matters. Major part of that work covers social responsibility on a large scale. We are specialists in leading HR key performance indicators (KPIs).

Governance

Accountor provides services with high level of information security and data protection. Through our services, our customers are able to meet compliance requirements, such as annual reporting and its metrics. We also offer competence for sanction checks, which is a part of supply chain compliance management.



2.6 Reporting conventions

The status presented in this Sustainability Report covers annual data for 1.1.-31.12.2023, unless stated otherwise. We update this report annually since 2021.

In this report, we have used Global Reporting Initiative contents and reporting conventions as an inspiration, to provide our results in a global common language within sustainability reporting. As the terminology, we use the terms *ESG* and *sustainability* interchangeably in this report.

This report covers all Accountor service business country organisations as well as Group functions (see Appendix 2. Accountor structure for a comprehensive list of companies, highlighted companies included

in this report). Possible exceptions are defined in Appendix 1. *GRI Content Index*.

Part of our sustainability data is externally assured, but partly it has not been assured. We have used external audits in areas of privacy, information security and financial data. Also, our carbon emission calculation is generated in collaboration with Climate Partner and is based on the guidelines of the Greenhouse Gas Protocol. Our sustainability data and processes were audited and confirmed according to EcoVadis methodology in November 2023.



For questions about the report or reported information, please contact comms@accountor.fi

03 Sustainable governance

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Sustainable governance is one of the main themes for our sustainability work. Due to the nature of our business, information security and data protection are at the core of our sustainability work.

We take the secure processing of our own and our customers' financial and personnel data very seriously. With our solutions and services, we also help our customers to implement formalised and sustainable governance methods in their companies.

For several years already, we have defined and follow a set of policies and principles about business ethics, information security and data protection, and risk management.





3.1 Business ethics and policies

Along our focus on the Sustainability Development Goal (SDG) 16.5 *Substantially reduce corruption and bribery in all their forms*, Accountor has established a Code of Conduct that states guidelines on corruption and bribery as well as other business ethics.

All Accountorians, managers and officers are responsible for compliance with the principles and standards set out in our Code of Conduct. Similarly, all employees must avoid any practices or circumstances that may lead to non-compliance with the Code of Conduct.

Our Code of Conduct is an important tool for risk management, and it sets out the general principles and guidelines our business partners and we need to comply with.

In addition, Accountor has a full suite of policies and procedures to ensure that sustainability aspects and ethical principles are embedded into our everyday activities. This suite of regulatory compliance policies is comprehensive and includes a purpose statement and scope (including applicable regulations that relate to the policy). Policies are reviewed at minimum every five years and are in line with changes to either the Group's operations or regulatory requirements. They all are approved by Accountor's Board of Directors or Accountor Leadership Team. Leadership teams in our operating countries are responsible for ensuring that the relevant legislation and regulations are captured within the policies and that the policies are made available in the local language.

3.1.1 Code of conduct

Accountor Code of Conduct is a statement of our ambitions to be trustworthy, responsible and ethical towards customers, partners, employees, management and other stakeholders. The Code of Conduct has been accepted by Accountor's Board of Directors and it is binding for all business lines in all our operating countries. Leadership and managers are responsible for adopting the principles of Accountor's Code of Conduct and ensuring that their team members are aware of the Code of Conduct and understand its purpose and meaning.

At present, anti-bribery and corruption, and fraud topics are covered in Accountor's Code of Conduct and related training materials. Any violation of the Code of Conduct may result in disciplinary actions, including termination of employment or service.

We have strict rules and a company culture which enable and encourage us to cease operations with any existing customer known to be violating the principles of Accountor's Code of Conduct or local

legislation relating to business ethics. We operate with high ethical standards and expect the same from our customers, partners and vendors.

In order to support our ambition:

- Code of Conduct includes topics such as acting against bribery, corruption and money laundering.
- We provide training during on-boarding to all employees in all the countries we operate in. In addition, we publish bulletins on our intranet.
- Leadership and managers are required to observe their business or team and business activities and anticipate the business compliance risks. They also are responsible for ensuring their team members feel comfortable in reporting possible areas of concern.
- Leadership and management participate actively in the compliance progress and follow governance at Accountor, reporting incidents or highlighting concerns to the Accountor Leadership Team.



[Read our Code of Conduct →](#)



3.1.2 Corporate governance of Accountor group

Corporate Governance of Accountor Group is a statement concerning the Group structure, general meeting of shareholders, Accountor's Board of Directors, Board committees, CEO, Leadership Team and other executives, decision-making authorities and the right to represent the company, recruitment and remuneration and internal controls.

According to the Corporate Governance statement, the parent company of the Accountor group companies is Accountor Group Oy, which is a limited liability company registered in Finland. Accountor Holding Oy is, however, directly or through intermediated companies, the main operating parent company for companies established in Finland, Sweden, Norway, Denmark, the Netherlands and Ukraine. Appendix 2 Accountor Structure provides the detailed Group legal structure.

Pursuant to the Articles of Association of the Company, Accountor's Board of Directors shall consist of no less than five and no more than eight members and, if elected, personal deputy members. The term of the

board members is indefinite, and the board members elect a Chair to the Board amongst its members.

The members of Accountor's Board of Directors represent all shareholders and safeguard their common interests impartially. A person that is elected to the Board shall have the qualifications required by the duties and the possibility to devote a sufficient amount of time to the work. The Board appoints the CEO, who is not a member of the Board, and the executives to the Accountor Leadership Team (ALT).

Accountor's major owners disclose significant memberships or conflicts of interests of the members of the Board.

In 2023, Accountor's Board of Directors had not deemed necessary to establish committees, because, taking into account the scope and nature of the company's operations as well as the Boards' working methods, the Board is able to handle matters effectively without such committees. Committees may however be established going forward if such a decision is made by the Board.

Anti-trust and fair competition

Accountor has a Competition Compliance Policy approved by Accountor Leadership Team. This policy is applicable throughout Accountor Group and no distinction has been drawn between the local laws of the EU Member States or the EU Competition laws and the competition laws outside the EU.

We have also established a competition law compliance training for those who hold relevant sales positions or management and business decision-making powers or influence.

Whistleblowing

Accountor strives to achieve transparency and a high level of business ethics. Therefore, Accountor has established an independent and anonymous whistleblowing channel already in 2020 based on the EU Whistleblowing Directive. All employees have access to their country-specific whistleblowing channel via intranet.

The Accountor Group Ethics Committee or another specified body within each country organisation handles confidentially all suspicions of misconduct that need to be addressed either via the whistle-

blowing channel or other reporting routes. In 2023, four cases were resolved as a result of Whistleblowing process.

Anti-money laundering

Anti-money laundering (AML) legislation applies to Accountor's service business where we are providing accounting, payroll, tax or legal services. We follow the AML legislation and in 2023 we continued to strengthen our compliance in this regard. Among others, in 2023 we updated our risk assessment and improved further our AML/KYC processes.

Sanctions

We comply with the sanction regulation. As part of Accountor's procedure for engaging with new customers and vendors, we perform sanction screening towards EU, UN and OFAC sanctions lists. We refuse all business transactions with persons and entities on the sanctions list. We also determine the ultimate beneficiaries when acquiring or divesting businesses. In 2023, we continued to improve our sanction screening processes and prepared the sanction screening risk assessment which was approved by Accountor Leadership Team.



3.1.3 Tax principles

We are committed to operating in a responsible way and with high ethics in all our activities. We comply with all local tax legislation and other regulations in all jurisdictions. This means that we fulfil all our reporting requirements and pay all legally imposed direct, indirect and other taxes in countries where Accountor has operations. We operate in labour-intensive business and pay all pension, social security and other personnel expenses as well as value-added taxes (VAT) appropriately.

In 2023, the following taxes were borne and collected by Accountor Group. Most of the taxes were paid in Finland, where majority of Accountor's business also operates.

M€	2023	2022
Corporate income tax	0,9	1,6
Net VAT	28,1	28,2
Withholding taxes	21,5	21,4
Payroll taxes*	3,4	3,1
Total	53,9	54,3

*Does not include pension taxes

We always cooperate fully with the authorities and disclose all information that is needed to determine tax consequences.

Group Financial Control under the Chief Financial Office function is responsible for tax compliance and management of Group-level tax reporting requirements such as Transfer Pricing documentation. The head of finance in each operating country is responsible for compliance with local tax laws including reporting and filing requirements (income tax, VAT, payroll tax).

Group Financial Control has regular cooperation with the country organisations' finance heads and external tax advisors to identify and manage possible tax risk areas. Group Financial Control actively monitors and evaluates tax impacts of changes in operations and tax regulations, guides business units and initiates needed changes required by new tax regulations. Tax topics are reported to Accountor Risk and Compliance Committee (RCC) according to Group's Risk Management Policy.



Furthermore, Accountor has been participating in a real-time economics program together with the Finnish Tax Authorities and other industry operators. The program aims to promote transparent and smooth financial data flow within our society while providing support to small and micro-enterprises to be able to comply with the requirements of financial information's digitalisation.

3.2 Information security and data protection

Information security and data protection is one of Accountor’s sustainability focus areas under our sustainable governance theme. As a professional service provider, we comply with applicable laws, relevant authorities’ decisions and follow industry best practices in ensuring the security of processing information.

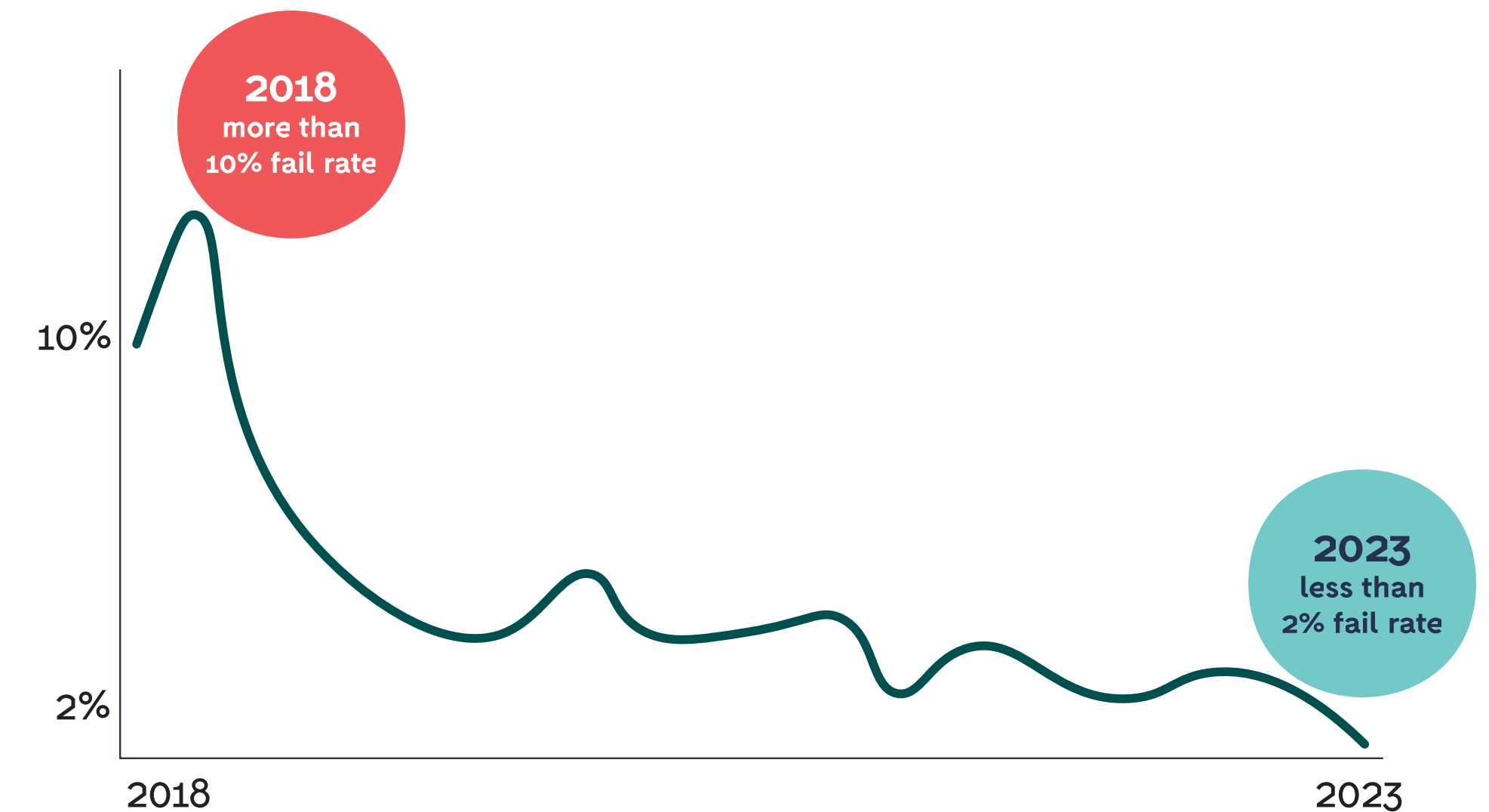
Due to nature of Accountor business, we extensively process personal data and important financial data by our personnel. Therefore, we have developed highly professional and comprehensive information security and data protection measures and ensured that our personnel is trained regularly on information security and data protection matters.

During 2023, we continued to strengthen our information security and data protection practices to ensure that we meet our stakeholders increased expectations. We have been using gamifying phishing simulation training with high onboarding rate since 2018.

To ensure that we meet our stakeholders increased expectations, we intensified our focus on information security and data protection practices during 2023. We started preparations for the upcoming EU regulation, such as NIS2, by investigating the requirements and running a GAP analysis between our internal control catalogue and the directive.

Information Security

Our information security framework is aligned with industry best practices and applicable laws. ISO27001, an international, formally certified management system for information security, is the guiding framework for our information security policy, guidelines and practices. Based on it, we have an Information Security Policy that is reviewed and updated annually and approved by Accountor’s Leadership Team or the Risk and Compliance Committee. The policy details our scope, objectives, compliance, implementation, roles and responsibilities, information policy framework, and disciplinary actions.



Phishing simulation training fail rate. (HoxHunt)



Our information security operations include performing risk assessments and audits, creating work plans to reduce risks, and implementing those work plans. Implementation of security activities is documented and regularly reviewed.

In addition to in-house personnel and outsourced Security Operations Centre service, we have a 24/7 on-call practice within Accountor to protect our critical services and infrastructure.

Data protection

We are fully transparent on the processing of personal data in connection of our operations towards our customers, employees, and other stakeholders. Our privacy statements are easily available for relevant individuals. For example, we have published statements for customers and business stakeholders, website visitors and job applicants on our website.

When we process personal data on behalf of our customers, we provide service specific descriptions wherein necessary details are provided to customer companies how their personal data is being processed in our processes and IT environments.

We have developed methods to monitor and ensure our compliance with privacy requirements. For example, we conduct an annual comprehensive self-assessment covering all relevant privacy domains and requirements arising thereof. Based on the results, we plan our activities and prioritise those to continuously improve our compliance level further.

Information security and data protection governance

Accountor has a governance framework to ensure compliance with privacy laws, internal policies, and industry best practices. We have established dedicated information security and privacy roles across the organisation. In the Group's governance model, the Risk and Compliance Committee, consisting of selected Leadership Team members, governs and monitors information security, privacy compliance, and related risks at the Group level with the Accountor has a governance framework to ensure compliance with privacy laws, internal policies, and industry best practices. We have established dedicated information security and privacy roles across the organisation. In the Group's governance model, the Risk and Compliance Committee,

consisting of selected Leadership Team members, governs and monitors information security, privacy compliance, and related risks at the Group level with the help of the Chief Information Security Officer (CISO) and the Data Protection Officer (DPO). The CISO and DPO both report to Chief Information Officer (CIO), who is a member of Accountor Leadership Team and reports to the CEO.

Each country organisation is responsible for the implementation of information security controls and data protection requirements in their operations. Information Security Managers and Data Protection Managers provide operational support for the units within their area of responsibility. Information Security Managers are part of the Group Information Security team led by the CISO. The Data Protection Managers are part of Group Privacy Team led by the DPO.

Security incidents and personal data breaches

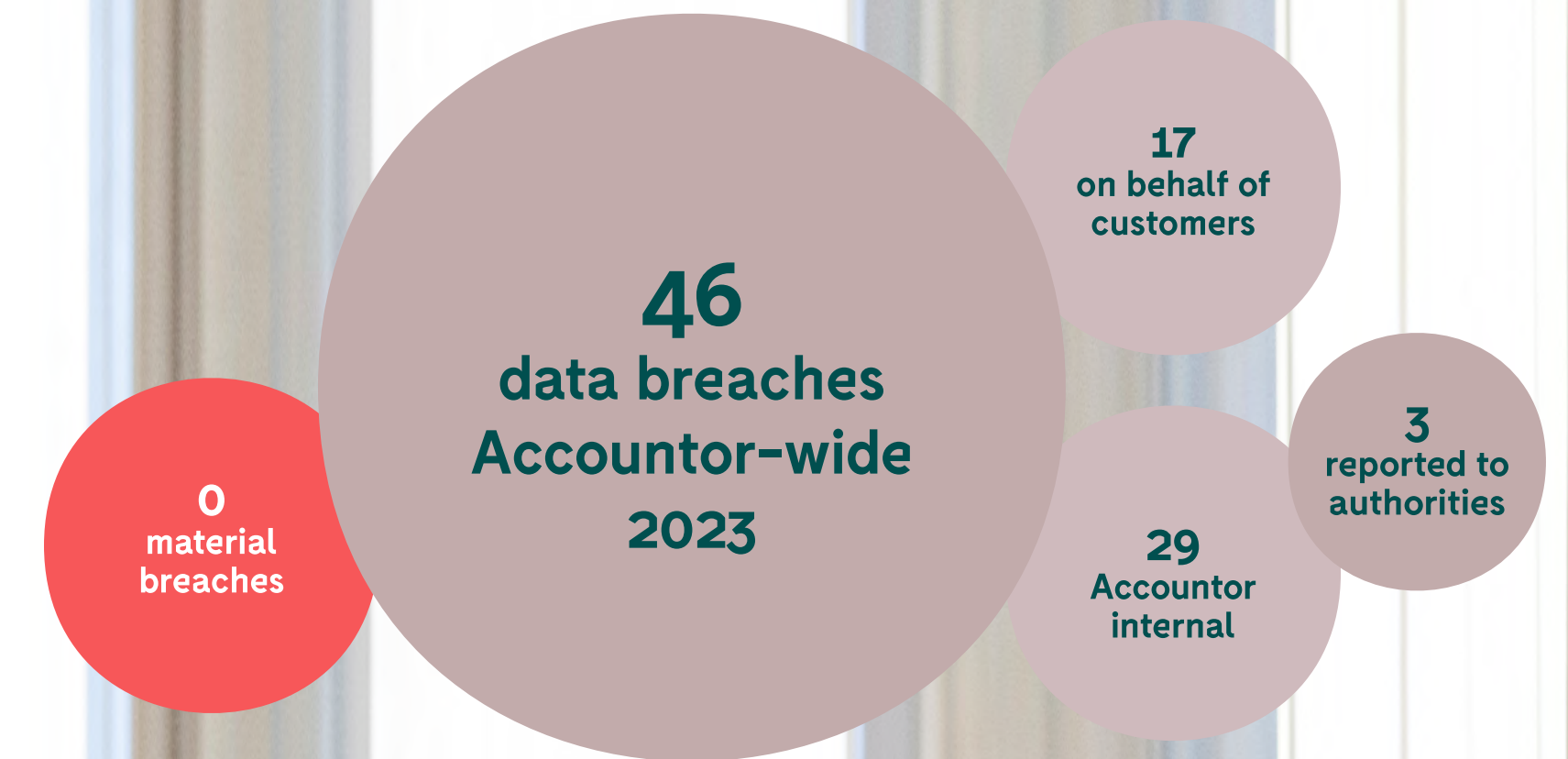
Since 2018, we have diligently tracked information security incidents and personal data breaches. We have never experienced significant security incidents

or data breaches related to our processed information or third-party vendors (such as cloud-based services).

In 2023, Accountor received no substantiated complaints or sanctions from regulatory bodies regarding personal data breaches. We recorded a total of 46 personal data breaches across different units.

Of these, 17 breaches pertained to personal data processed on behalf of our customers. We promptly notified affected customers, who then assessed whether reporting to authorities or impacted individuals was necessary.

Regarding information owned and processed for Accountor's own purposes (as the controller), there were 29 personal data breaches in 2023. Only 3 posed risks to individuals and were reported to authorities. None were material, and all were addressed according to requirements. We have thoroughly analysed the events leading up to breaches and conducted lessons learned sessions to prevent recurrence.





3.3 Risk management

Our Code of Conduct is an important tool for risk management and sets out Accountor's principles and guidelines.

Sustainability risks identified as critical are integrated within existing risk management processes and included in regular monitoring by the Risk and Compliance Committee.

According to the Accountor Group Risk Management Policy (approved by Accountor's Board of Directors), Accountor's Board of Directors and especially the Risk and Compliance Committee assesses regularly Accountor Group's financial, operational and strategic risks while monitoring the effectiveness of the risk management systems. Accountor's CEO and Accountor Leadership Team (ALT) are responsible for the operational management of the company and implementation of the Risk Policy. This is supported by the Risk and Compliance Committee (RCC). Risk Management deficiencies are reported to the ALT, the

Risk and Compliance Committee and Accountor's Board of Directors.

The RCC is responsible for coordinating all risk management related control activities, information sharing and monitoring. The RCC adds value by supporting and sharing information of risk management issues across the organisation. The RCC promotes Accountor's culture of risk awareness by establishing the Risk Management Framework as a concrete, everyday guideline for everyone at Accountor.

In 2023, Accountor conducted a preliminary double materiality assessment as part of its CSRD proceedings to identify stakeholder interests. The findings emphasized the importance of understanding and addressing the evolving needs of its customer base for sustainable business practices. Accountor plans to further this assessment in 2024 and beyond to meet ESRS requirements.



3.4 Supply chain management

We have defend a Code of Conduct for Suppliers that follows Accountor’s Code of Conduct, but sets more specific requirements for suppliers, including sustainability topics. All new suppliers are required to approve it as a prerequisite of our collaboration. However, as purchasing is not done centrally at Accountor, we do not have data from 2023 on the percentage of new suppliers that were screened using the social criteria.

Our procurement practice aims to comply with the Accountor Code of Conduct for Suppliers. We manage a significant amount of data together with our suppliers. Therefore, in addition to meeting the requirements of the Code of Conduct for Suppliers, Accountor procurement process sets additional requirements for suppliers regarding information security, data processing and privacy. We assess suppliers using a specific Third Party Audit Framework which includes i.e. information security and data protection sections, to the extent appropriate prior to entering into agreement. In addition, in case a supplier’s service involves handling, assigning, transferring, or providing access to personal data, we require Accountor Supplier Data Processing agreement (DPA).

04 People first

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4.1 People first principle in short

Accountor is committed to offering sustainable and motivating employment and ensuring the continuous development of our people. Our culture and employee experience are described by the term “People First”. We believe that our primary focus on people will attract, engage and retain talent as well as improve their wellbeing and competencies. Our consistent focus on people, managerial work and intrinsic motivation enables us to create an innovative and sustainable platform for our customers and society to conserve environmental resources.

Considering our impact on people is a guiding principle in our decision-making and it is integral part of all our processes. We believe that sustainable business is built on consistent competence development, high standards in people manage-

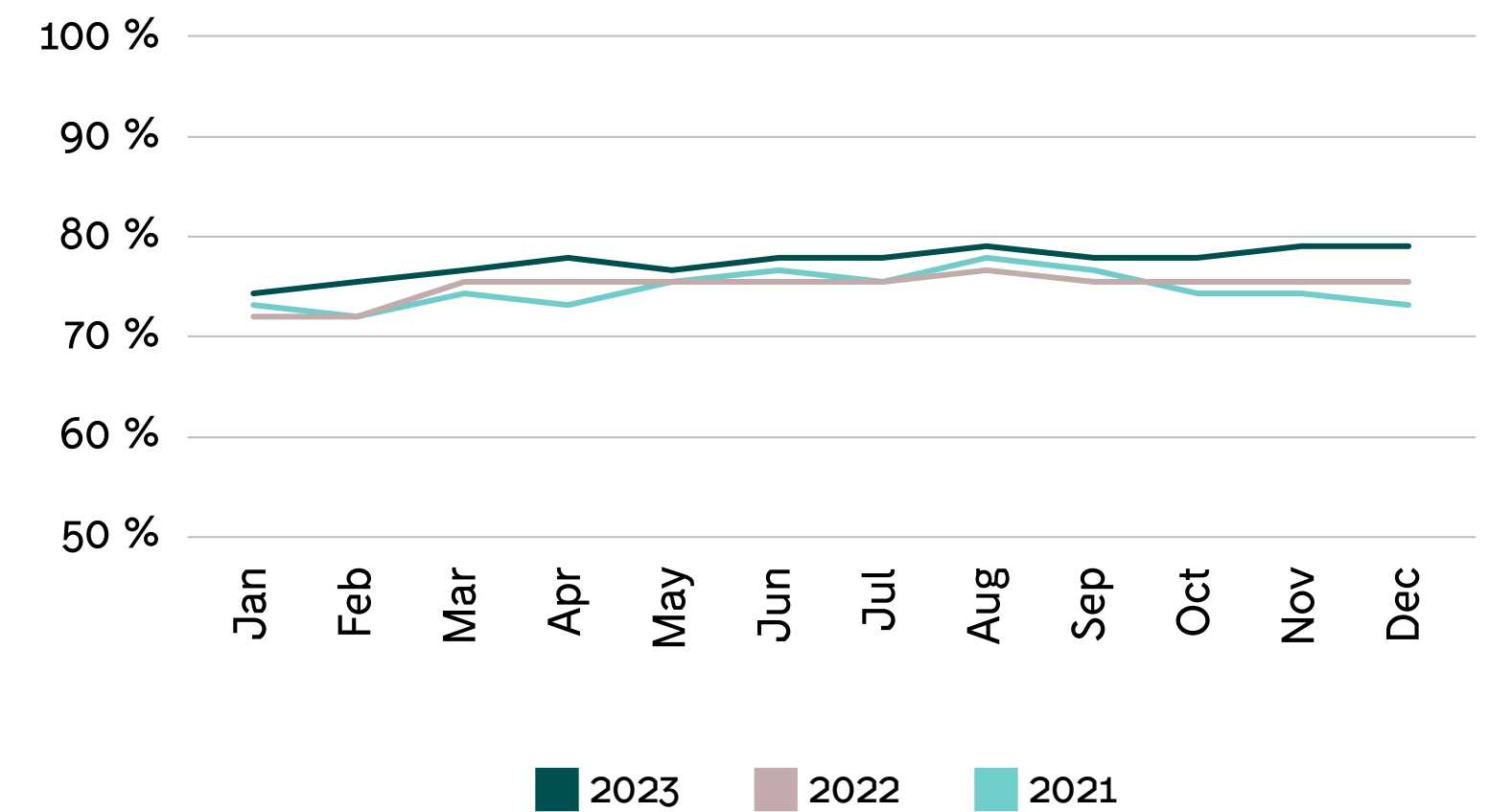
ment, and the ethical use and development of human capabilities.

We put emphasis on human rights, dignity and respect as well as diversity and inclusion. We offer solid and motivating employment, continuous growth of capabilities and enhanced physical and mental wellbeing. Our approach to motivation is built on three pillars: autonomy, competence and relatedness.

At Accountor we follow the realisation of People First principles every day with our on-line motivation reflection tool. The motivation KPI is an essential part of every business review at Accountor. Our annual People First survey gives us plenty of data to make Accountor an even better workplace.

Motivation metric

% of Accountor employees feel energized and inspiration at minimum several times a week



4.2 Competence development

Systematic and business-driven competence and people development is a critical factor for sustainable success in transforming and digitalising financial administration with increasing compliance requirements. Consistent investment in competence development enables us to attract and retain talent and ensure the development of sustainable and innovative service portfolio.

Accountor’s competence development target is that the average training hours per employee remains

above seven hours annually. In 2023, the recorded training hours were in Accountor service business 19,1 hours per employee (2022: 16,5h).

We make an effort to maximise employee motivation because we believe it supports better performance, continuous learning and wellbeing of employees.

Our leadership and management philosophy called “Leaderment” is executed by each manager.

The Leaderment training path for managers consists of four modules and every manager that has either been promoted or has joined the company recently

participates in the trainings. In 2023, Accountor managers participated actively in the Leaderment trainings and their annual training hours were in the service business 21,1 hours per manager.

Our investment in Leaderment training and focus is apparent in the high employee satisfaction to managerial work at Accountor; 82% of the responses are positive for six manager work related questions in our annual People First engagement survey.

In 2023, our key areas of competence development were:

- Leadership and Management (Leaderment)
- Inclusion and diversity
- Consultative customer service
- Certification of payroll and accounting specialists.

Leaderment trainings organized 2023

Training name	Duration/ training	No of participants	(Estimated) training hours total in 2023	(Estimated) training days total in 2023
Leaderment Kick-Off	10h / 1,5 days	29	290	43,5
Change Leaderment	14h / 2 days (+travel time)	34	476	68
Motivation Leaderment	14h / 2 days	6	84	12
Leaderment Communication	13,5h / 2 days	0	0	0
All Leaderment –trainings in services business		69	850	123,5

Compliance trainings and meeting high ethical standards

Governance capabilities are at the core of the Accountor business. We are committed to providing compliant services and following high ethical standards. Every employee joining Accountor must become familiar and engage with our high ethical standards.

Accountor aims that, in addition to 100% training coverage of previous employees, the new employees are trained on ethical matters within two months of their starting date. The mandatory ethical trainings include training on the Code of Conduct, information security, privacy, GDPR and a general introduction to Accountor. The mandatory trainings are available in every operating country in the local language on our virtual learning platform. 555 new employees working for Accountor service business completed the induction training path during 2023.

In addition to mandatory governance trainings for every Accountor employee, we have supplementary mandatory governance trainings, covering subjects such as competition law and money laundering, for employees working in relevant roles.

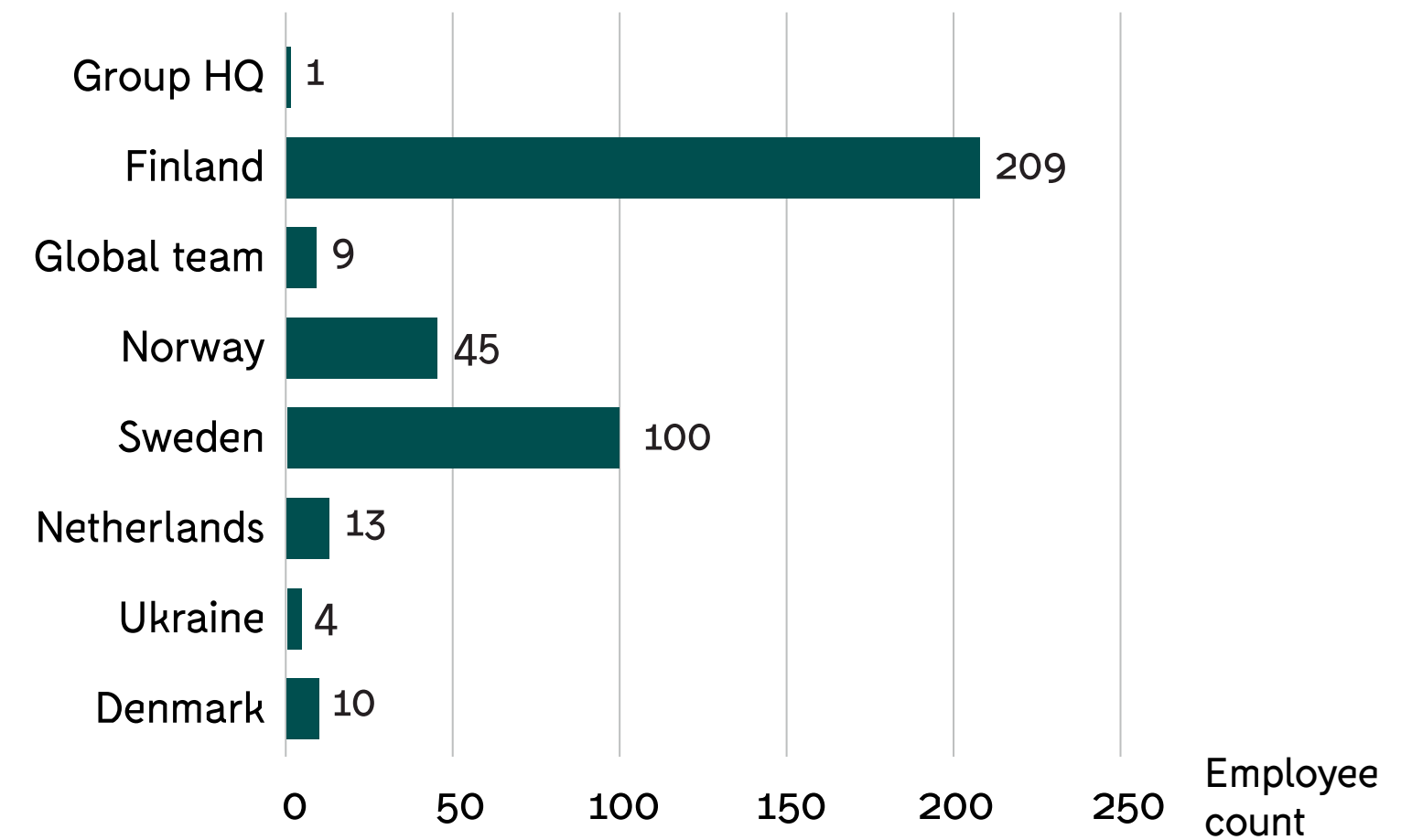
Digitalisation and automation capability development

Accountor seeks to be a forerunner in digitalisation and automation of financial, payroll and HR fields. During 2023, we developed our employees’ capabilities to succeed in the modern world by investing in automation and competence development through our DigiOS program. Our advanced working model offers increased variety of career and training opportunities for our employees.

Professional certification for accountants and payroll specialists

Accountor supports the professional development of our employees. Gaining authorised certification in accounting or payroll

a+ Induction path completion (per country)





improves an employee's career opportunities in the labour market. Our employees are provided free access to certification programs in their field. Certification has positive impact on the base salary of the employee. Retaining certification requires a defined amount of advanced annual training. Accountor sponsors the fees and tuition of certification programs for our employees. All accounting and payroll employees have unlimited access to an accounting and payroll specialised training platform. The trainings are provided by leading training providers in each operating country.

Participating in developing competencies across society

In addition to our own people, we participate in improving competencies that are needed in our modern society. For example, we arrange trainings ("Academies") in payroll, accounting and robotics for people with basic or no skills on the topics. We provide payroll trainee programs for unemployed target groups in Finland and Denmark on regular basis. The aim of these Academies is to foster future talent and offer them work at Accountor without, however, restricting their career ambitions outside of Accountor.

4.3 Labour management

Accountor provides permanent employment for 95% and full-time employment for 88% of our 1725 employees. Accountor also provides internship opportunities for students. In the end of the period 26 students were on non-paid internship period in Accountor offices.

In 2023, Accountor’s headcount decreased by 69 driven by increased efficiency and decline in revenue in Norway. In all operating countries except Finland, the number of employees decreased moderately. Denmark numbers exclude Censea AS employees that were acquired in 2023.

4.3.1 External workforce

Accountor also uses external workforce providers to complement our own workforce. The amount of external work in 2023 was 57 full-time equivalents (FTEs) on monthly average. In 2023, the average amount of external workers was 46 FTEs.

Our external workforce is mainly working in areas where the availability of capable workforce is limited, such as highly skilled specialists in financial management, automation and robotisation, and human resources development roles. The monthly amount of external work varies depending on the cyclical variation of accounting and financial management work. We also need external resources to balance our workload during peak times, such as year-end closing.

Our units have long-term collaborations with local external workforce service providers in all our operating countries.

4.3.1.1. Equal and Inclusive external workforce practices

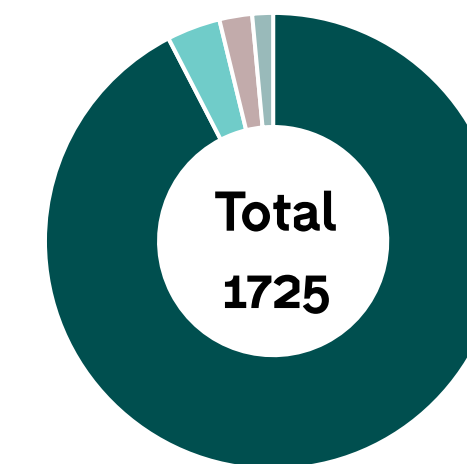
Accountor is committed to equality and ILO Declaration of Fundamental Principles and Rights at

Headcount development 2022–2023

	12-2023	12-2022	Change	Change %
Service business	1725	1794	-69	-4 %
Denmark *	67	83	-16	-19 %
Netherlands	39	47	-8	-17 %
Norway	227	253	-26	-10 %
Sweden	344	370	-26	-7 %
Ukraine	18	22	-4	-18 %
Finland	1030	1019	11	1 %

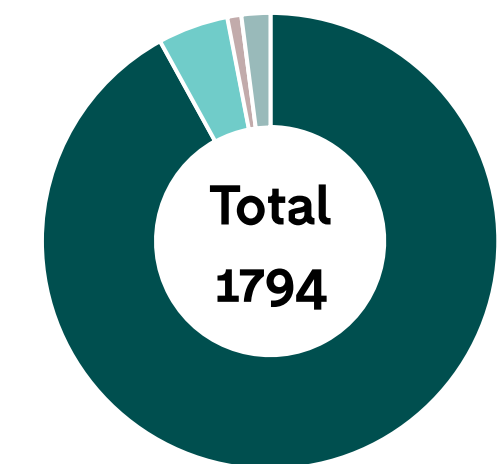
*excluding Cencea As employees

Type of contract 2022–2023



12/2023

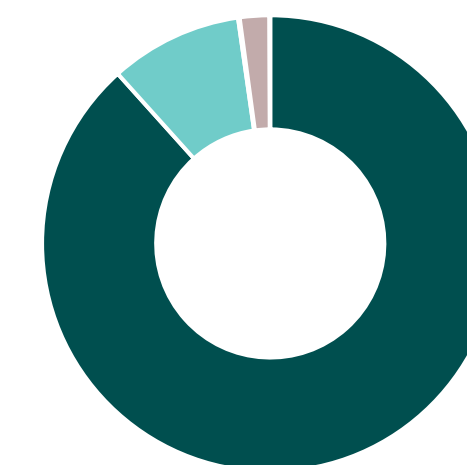
- Permanent 95 %
- Fixed term 4%
- External 2,3%
- Free trainee 1,5%



12/2022

- Permanent 92 %
- Fixed term 5 %
- External 1 %
- Free trainee 2 %

Nature of contract 2023



- Full time 88 %
- Part time 9 %
- On-request 2 %
- Partial retired 0 %
- Blanks 0 %

Work. To state our ambition and to frame principles and ways of working with employees employed by Accountor vendors we defined external workforce policy. Accountor seeks to provide inclusive workplace or both internal and external diverse workforce. Accountor external policy was confirmed in August 2023 by ESG committee.

The policy targets to ensure good working conditions and reduce any negative impact on both internal and external workforce and support sustainable, inclusive people practices. Accountor has set standard requirement to comply with our Code of Conduct and reserves rights to set control points related to human labour management in its value chain.

4.3.2 Collective agreements

Our compensation policy aims to provide above-market compensation level. 70% of our employees are governed by collective agreements, which defines a minimum monthly salary in each job grade.

In all our operating countries, our base salary average is high compared to the minimum salary detailed

either in the collective agreements or in legislation. In addition to base salary, Accountor employees belong to a bonus plan.

Employees’ freedom of association is a norm in our operating area in Northern Europe. In line with our values, we respect our personnel’s freedom of association. In our operating countries, employers are not legally allowed to collect data about labour union membership. We collaborate and have an active dialogue with labour unions. In Finland, Accountor has our own general agreement for accountant and payroll specialists which, in terms of benefits, exceeds the common general agreement in the field.

4.3.3 Length of service and employee turnover

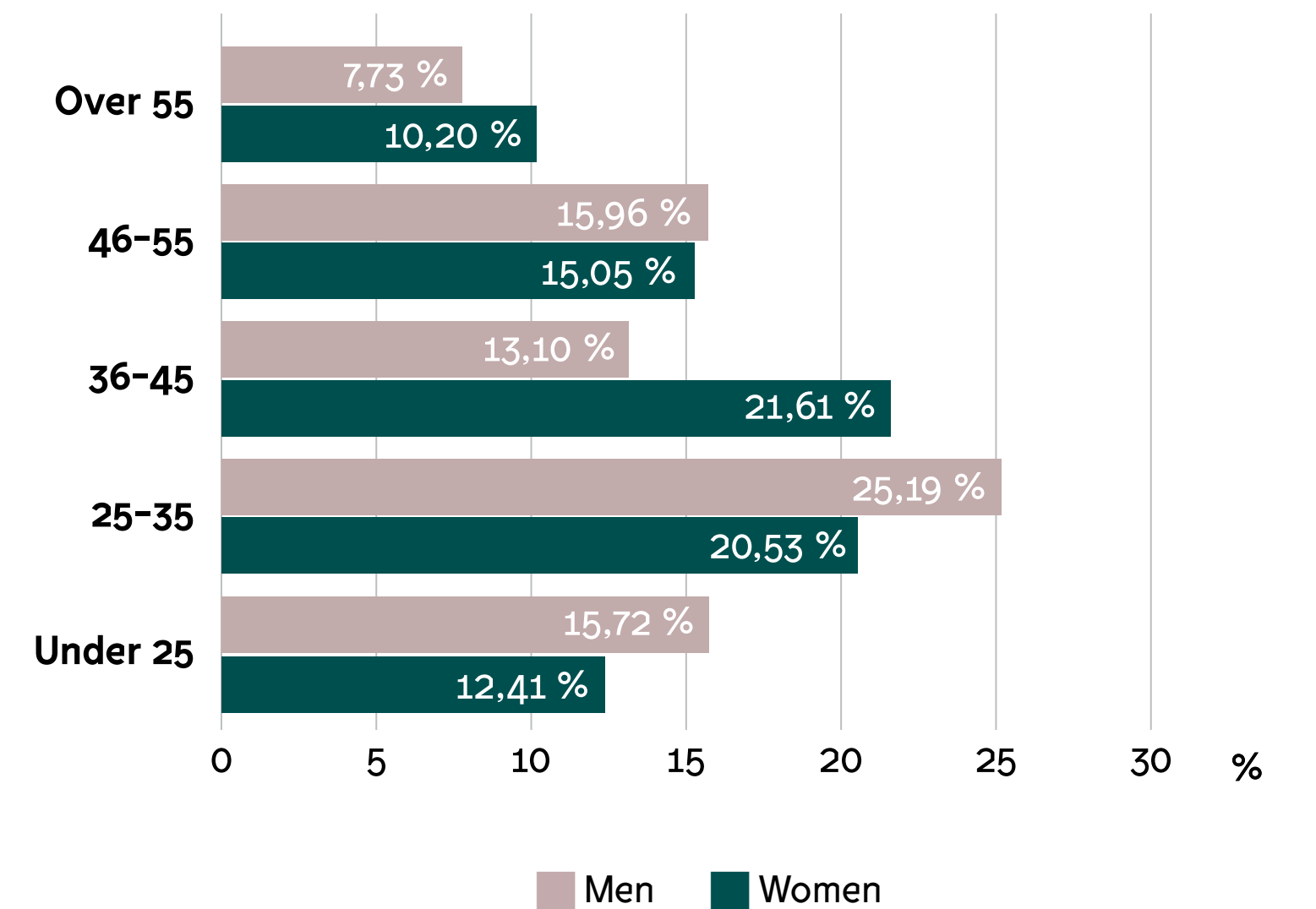
In 2023, Accountor service business recruited 388 employees. The average length of service at Accountor is six years – 5,8 for women and 6,4 for men.

Our voluntary employee turnover percentage, that is, resignations from permanent employments, decreased from 19,85% in 2022 to 17,03% during 2023.

Rate of total employee turnover by gender (%)



Rate of employee turnover by gender age group (%)



4.4 Inclusion and equality

Employee turnover was the highest in the areas of the scarce competence availability, such as capital areas of our operating countries. Accountor units have retention programs aiming to improve commitment and wellbeing to minimise employee turnover.

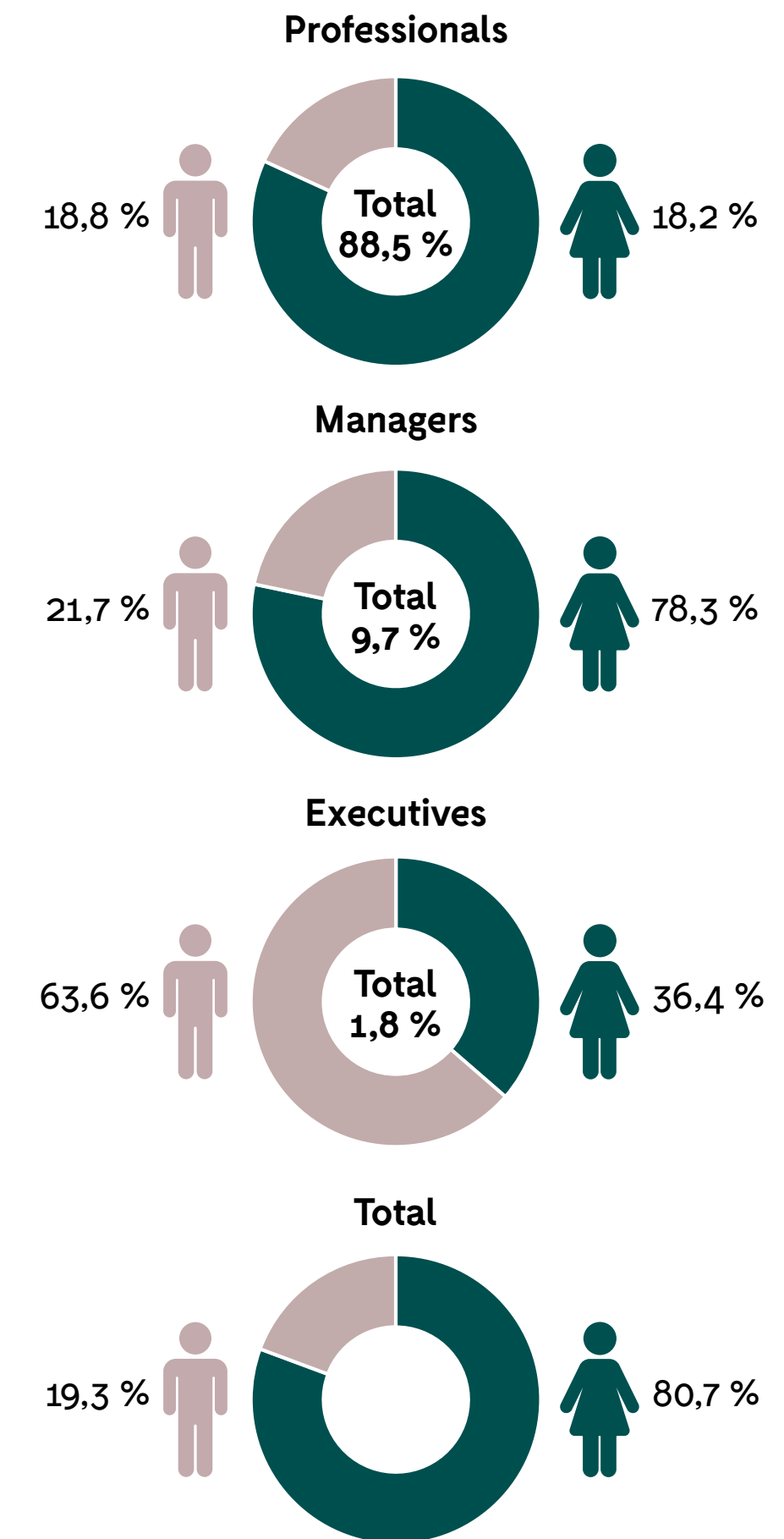
Our total employee engagement index is 3,89 and 71% of the responses are positive. Our eNPS (how likely our employees are to recommend Accountor as an employer) is -4,2. Typically, all numbers above zero are good. According to People First survey 71% of Accountor service business employees want to keep working for Accountor in the future.

At Accountor we value equality, inclusion and diversity. They enhance motivation and accelerate innovation. We want to develop our business by embracing the ideas, skills and perspectives of all our people. Diversity and inclusion enable us to meet the expectations of our diverse customers and provide excellent customer service. By driving inclusion and equality we can amplify our positive impact on society.

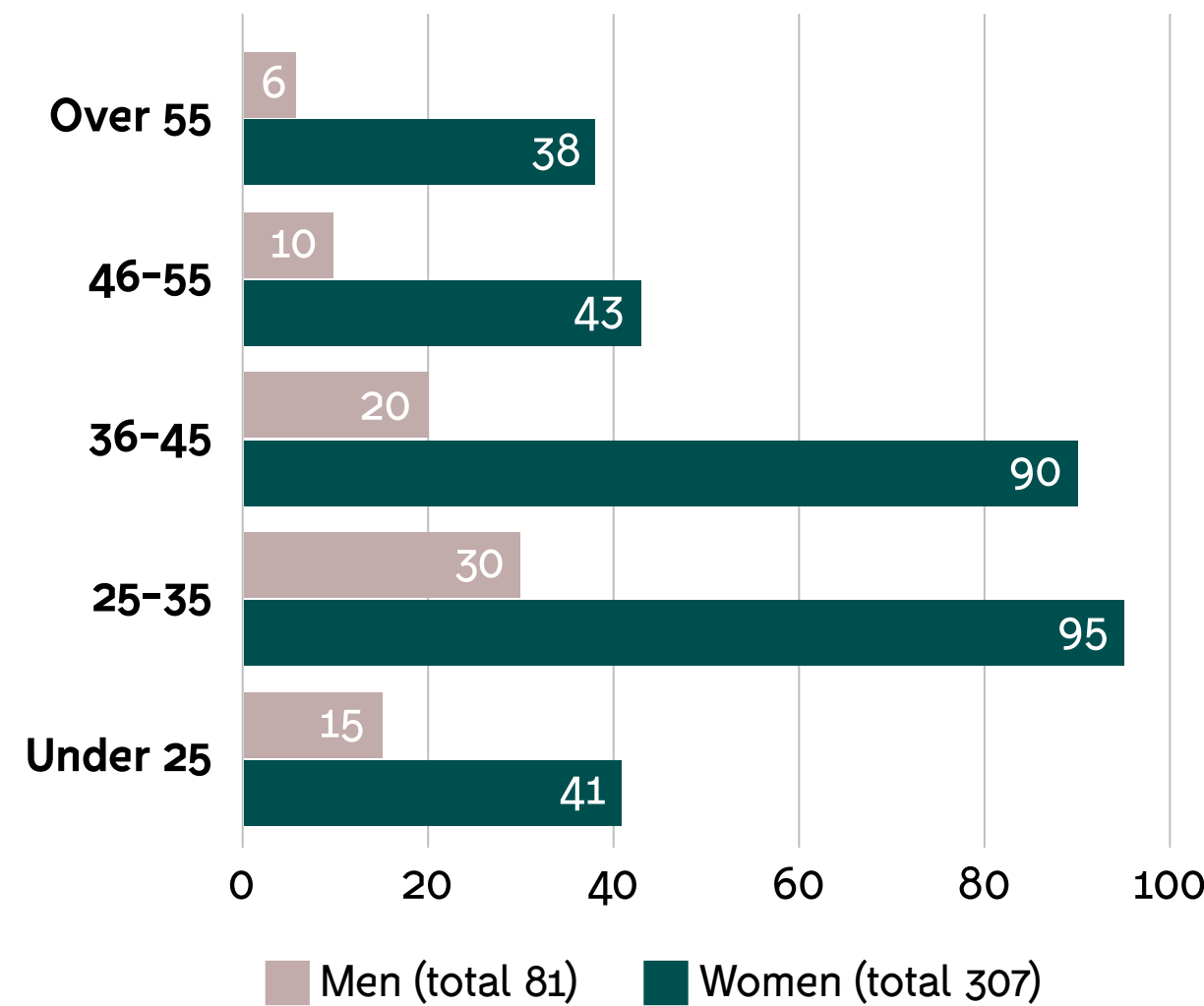
We took actions to increase inclusion and equality with positive outcomes. We launched two company-wide training programs to mitigate impacts of bias and to develop inclusion in teams. 164 managers participated in training programs with their teams during 2023.

We followed our progress in inclusion and equality through our annual People First survey. We compare the results of people identifying as belonging to a minority with all Accountorians' and make action plans to close the gaps of employee experience. In September 2023 we discovered that 110 employees who feel that they belong to a minority group had a total index of 63% positives compared to 71% of all

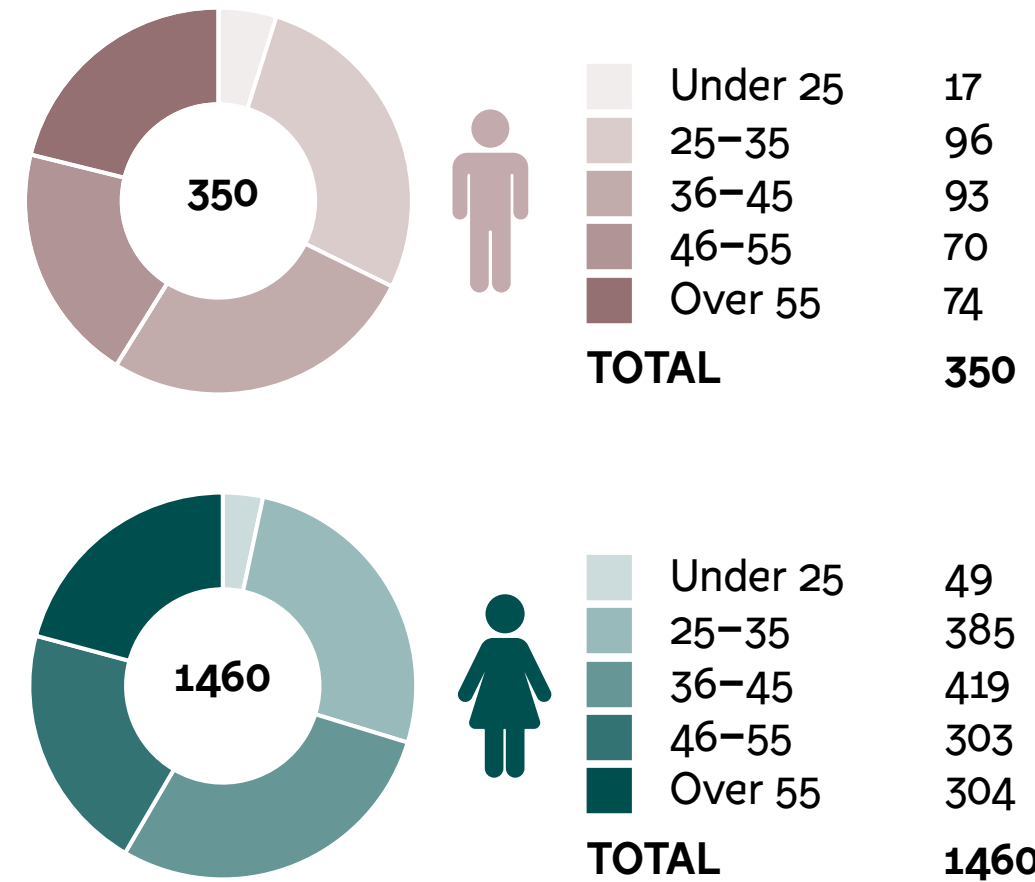
Gender ratio in employee groups (end of period)



Total number of new hires by gender and age group 2023



Number of employees by gender



Executives by gender and age group (end of period)



Age group	Women	Men	Total
Under 25	0	0	0
25-35	1	0	1
36-45	1	7	8
46-55	6	6	12
Over 55	4	8	12
TOTAL	12	21	33

employees. Biggest gaps were rated in target review frequency 41% vs 64% positives, fair compensation 27% vs 47% positives and opportunity to contribute to development 41% vs 59% positives.

80% of Accountor service business employees are women. The gender ratio in Accountor has remained the same in employee positions. The voluntary employee turnover of female employees was 17,3% and for male employees 16% in 2023.

The share of women in managerial positions is 78% and in executive positions 36%. We aim to increase the number of women in managerial and executive positions. Accountor’s Board of Directors did not have any female members in 2023. The average age of Accountorians is 44. Four percent of our employees are younger than 25 and 21% are over 55 years old. We provide employment opportunities, either full or part-time, to more than thirty employees who have passed the regulatory retirement age.

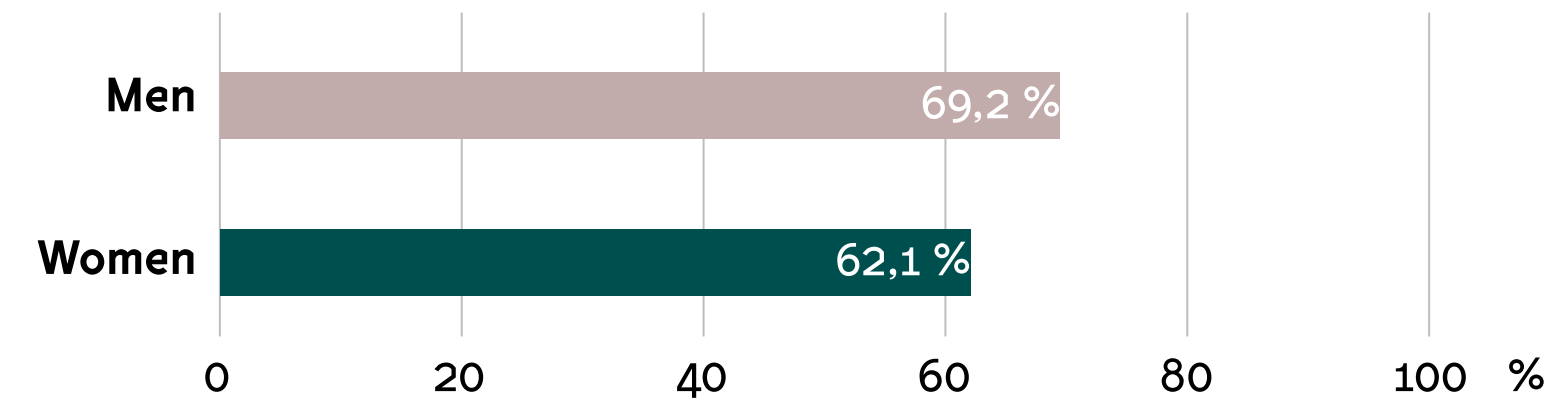
Accountor offers career opportunities and competence development of disabled employees with neuropsychiatric disorders. In Denmark and Norway, we have tailored working conditions for employees with neurodiversity.

Accountor focuses on increasing diversity in recruitments. Especially new employees in older and younger age groups are well-represented. Accountor’s employees in executive position (N35) and Board of Directors belong to diverse age groups.

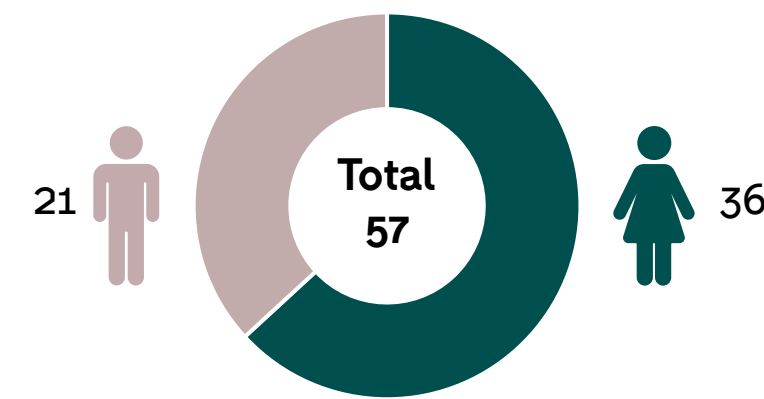


Retention rate after parental leave

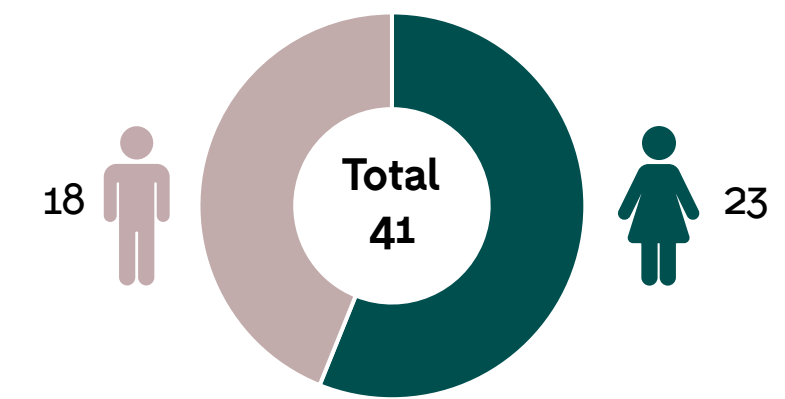
Total 65,1 %



Number of employees who returned to work after parental leave



Number of employees retained for 12 months after parental leave

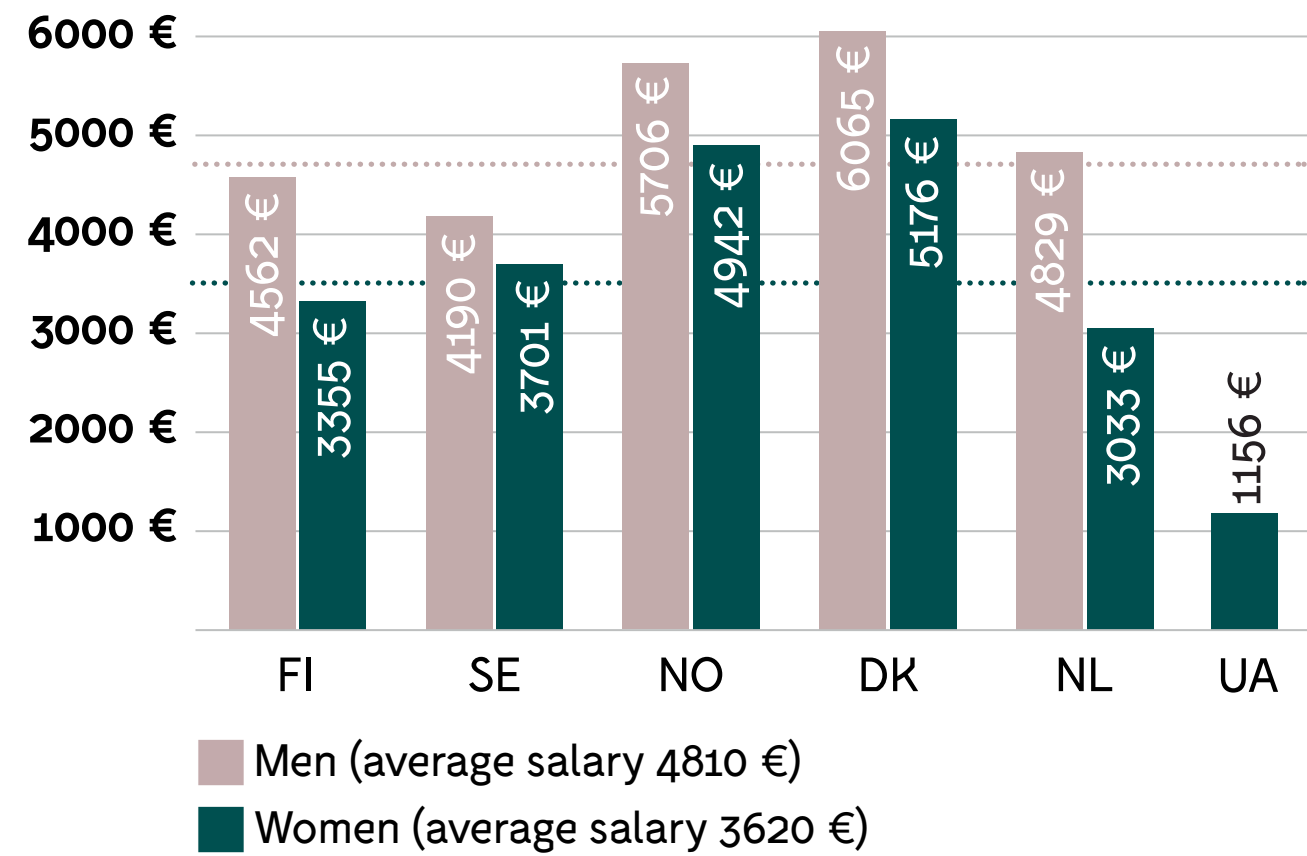


Supporting families

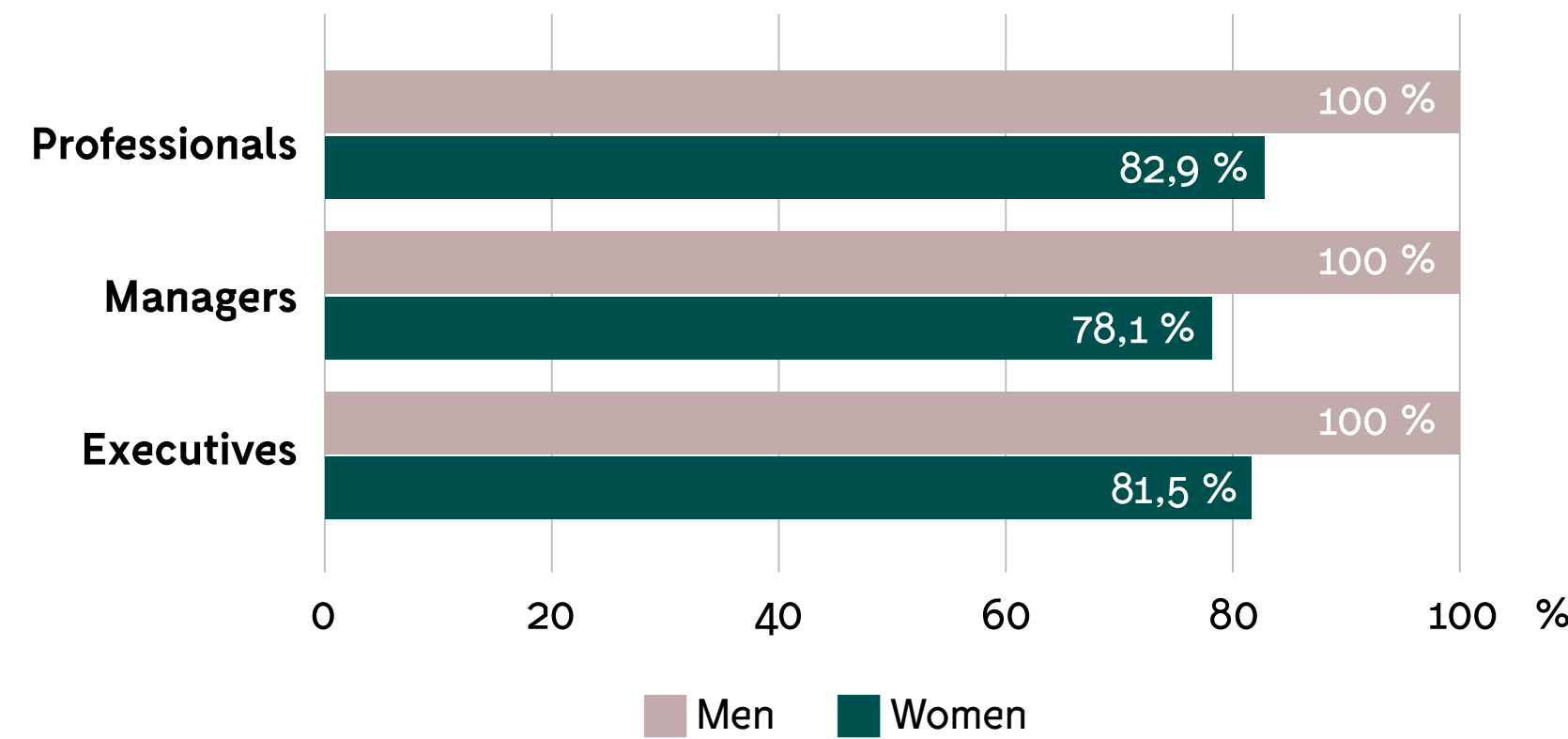
We operate in countries where the regulatory length of parental leaves varies from 11 months to 18 months. In addition to parental leave, Accountor offers additional benefits that vary by country. For example, in Finland Accountor offers a full salary for the first three months of parental leave for birth giving parent and one month full salary for other parent. 68 Accountor employees took parental leave during 2023 and 44 of them were women.

We support our employees' return from parental leave by offering opportunities for part-time work. The retention of employees returning from parental leave after 12 months is 65% which is 10% points higher than total turnover of all employees.

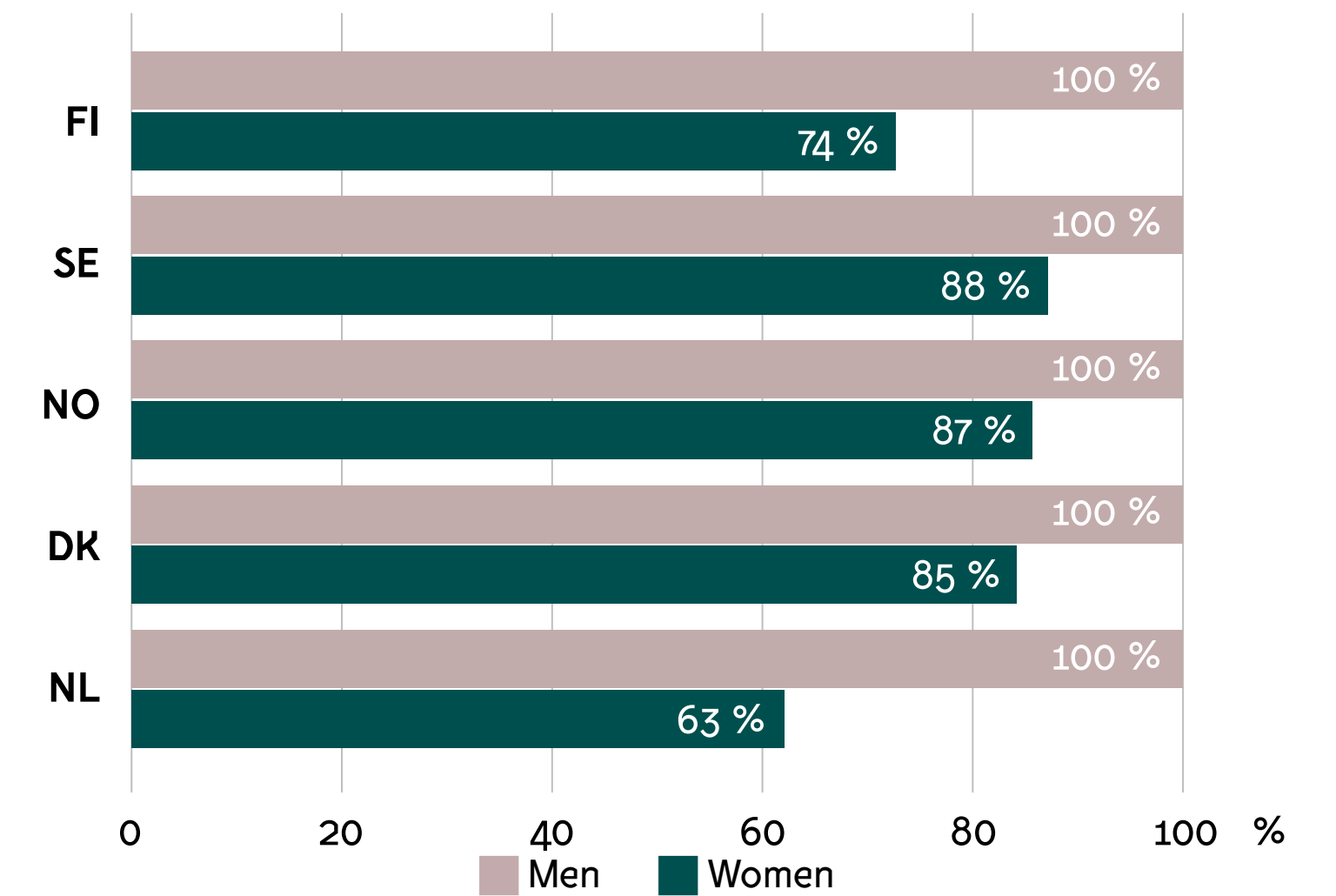
Average salaries by country and gender
Base salary euros / month



Salary ratios by gender and organisational position (%)
As a % of male gross earning



Salary ratios by country at Accountor (%)
As a % of male gross earning



4.4.1 Motivating compensation

Our compensation policy aims for an above-market compensation level. Our pay-for-performance policy requires that all Accountor employees have an opportunity to earn more.

Our compensation policy, bonus plans, and executive salary increase budgets are approved by Accountor’s Board of Directors annually. All individual remuneration decisions require, at a minimum, a second-level manager’s approval even if the remuneration is within budget frame.

The base salary of our employees is mainly determined by their role and responsibility area. Furthermore, competence, experience and performance have an impact on an individual’s salary level. Our bonus plan covers all employees and aims to bring higher than market average earnings to all employee groups.

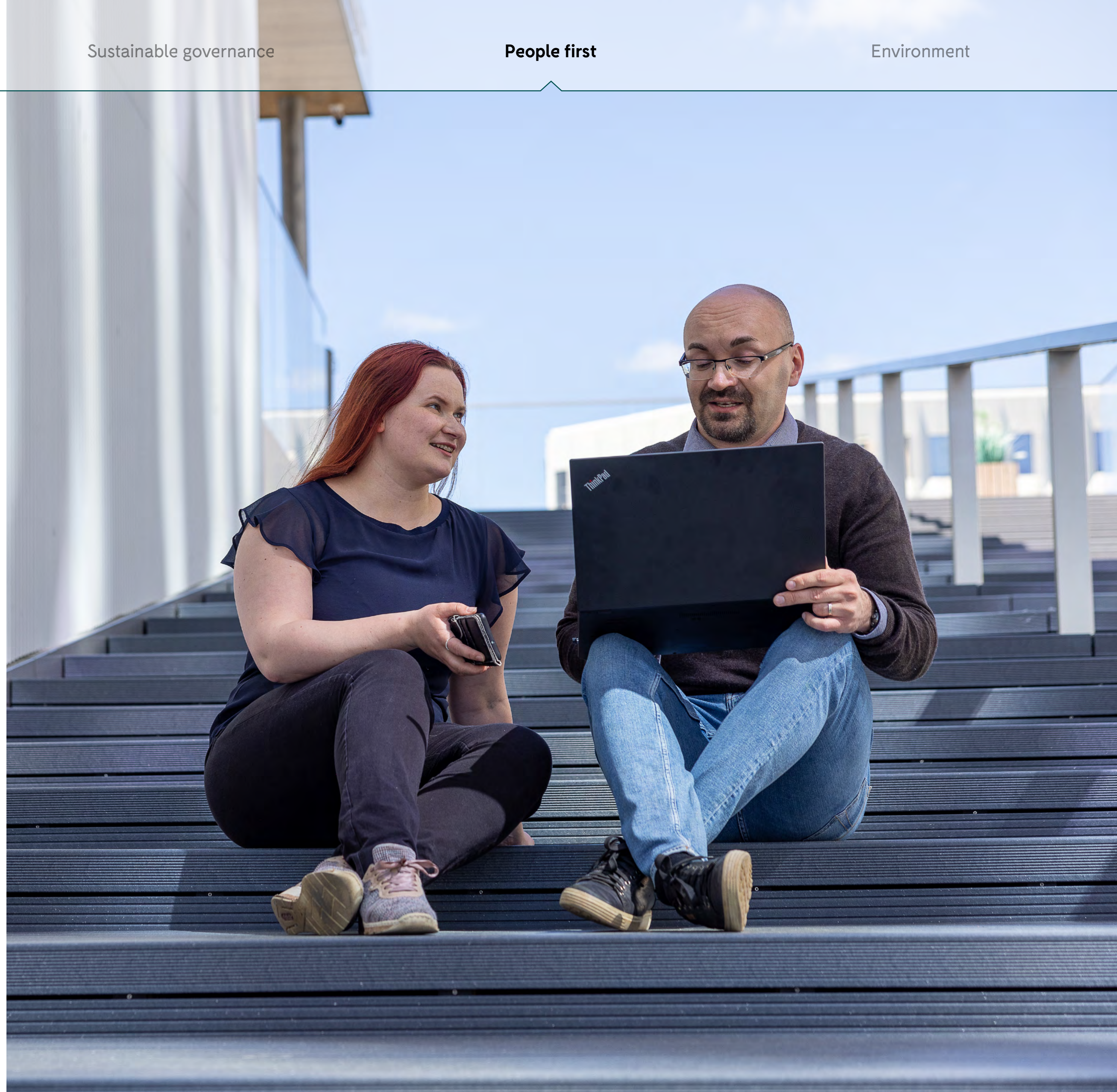
Seventy-one percent of our employments globally are governed by collective agreements, which detail a minimum monthly salary. The salaries specified in the collective agreement are applied to jobs covered by the agreement, such as accountants and payroll specialists.

In all our operating countries, Accountor's base salaries are higher than the minimum collective agreement minimum salary requirements. The salaries of employees not covered by collective agreements exceed the minimum salaries of collective agreements because these employees typically work in positions with managerial responsibility.

As we operate in a variety of fields, average salary is not a good indicator of salary level or structure. Moreover, salaries are influenced by years of experience as well as the cost-of-living category of the operating country.

In addition to their base salary, all Accountor employees are eligible for a bonus plan. Bonus payments are based on both our common financial- and team-level or individual targets, and the payments are linked to the monthly salary of the employee. Our plan provides an opportunity to earn bonus of 0,5 to 6 months' salary depending on the employee group.

At least 40% of the bonus is based on common financial targets. Individual and team-level targets are based on strategic KPIs. We promote autonomy and opportunity for all Accountorians to have an impact on their bonus. This is achieved by allowing autonomy for team leaders and members to select the most relevant bonus targets in dialogue with each other.



4.4.2 Executive and board remuneration

The remuneration structure of Accountor's executives consists of a base salary and a bonus opportunity equal to 1,5–6 months' salary, depending on the executive's role in governance bodies. Some executives have an agreement of termination payments if the employment is ended by the employer. The amount of termination compensation does not exceed six months' salary and shall not be paid in case the executive is in breach of duties, or Accountor policies, or does not comply with local legislation. Accountor does not provide additional retirement benefits to executives.

Members of Accountor's Board of Directors are compensated according to Accountor General Annual Meeting decision. The Board members are paid a monthly board member fee; the fee of the chairman is 1500 euros per month and 1000 euros per month for the other members. Additionally, a meeting fee of 200 euros per meeting is paid and travel expenses are compensated.

Accountor's Board of Directors develops compensation structures and reviews them annually, to best align them with the strategic and operational opportunities and challenges of the company, and to ensure appropriate incentives for management. When reviewing and approving annual remuneration guideline, the Board takes into consideration input from internal remuneration specialists, external labour market data and employees' satisfaction to compensation.

The executive remuneration is governed by Corporate Governance of Accountor Group. Annual remuneration guidelines about executive salary review, executive bonus plan and employee bonus plans approved by Accountor's Board of Directors.

All individual salary decisions require at minimum the line manager's line manager approval, and they must be compliant with the general frame approved by Accountor's Board of Directors.

When comparing Accountor's highest paid employee to the average employee, Accountor's highest paid individual earns five times the median earning.

The share of women in our executive positions is 18,32% in Accountor service business. Executive positions are defined as positions in the Leadership Team of Accountor service business unit and country Leadership Teams. The gender pay gap in executive positions is 17,5%. The gap is due to the male dominance in positions with profit and loss responsibility, which have higher salaries, and female dominance in director roles in support functions.



4.5 a+ Hybrid and wellbeing

Besides competence development and enhancing intrinsic motivation, occupational health and wellbeing are key factors in employee satisfaction. The specialocus of occupational health in 2023 is in supporting mental wellbeing.

In addition to extensive occupational health care services, Accountor provides online break exercises and a mental wellbeing hotline for all employees to ensure wellbeing. After pandemic also recreational benefits were increased in Sweden and Finland to support return to social recreational activities.

4.5.1 General wellbeing and development of occupational health and safety

Our offices and occupational health and safety

We at Accountor believe that wellbeing increases when a person has enough autonomy, psychological safety, and competences. Our offices aim to provide a safe working environment psychologically and physically.

Accountor has a policy and practice to provide above mandatory occupational health and wellbeing services

to all employees. This is achieved in close collaboration with local occupational health care service providers.

The access to services is not dependant whether the health care support need is based on occupational or personal life. In Finland, our most significant operating country, all employees despite their working time or length or type of employment are entitled to same above mandatory specialist doctor services, psychological support, and physiotherapy. In Sweden, Accountor started to provide additional health checks for employees in 2023. The external employees working for Accountor have access to occupational health care via their own employer.

Our employees are also protected when working remotely: they have additional accident insurance that covers accidents at remote workplaces and during their free time. The quality and access to occupational health care services are followed by local health and safety committees consisting of employer and employee representatives. Accountor management in each Accountor company is responsible for compliance with Accountor health and safety policy.

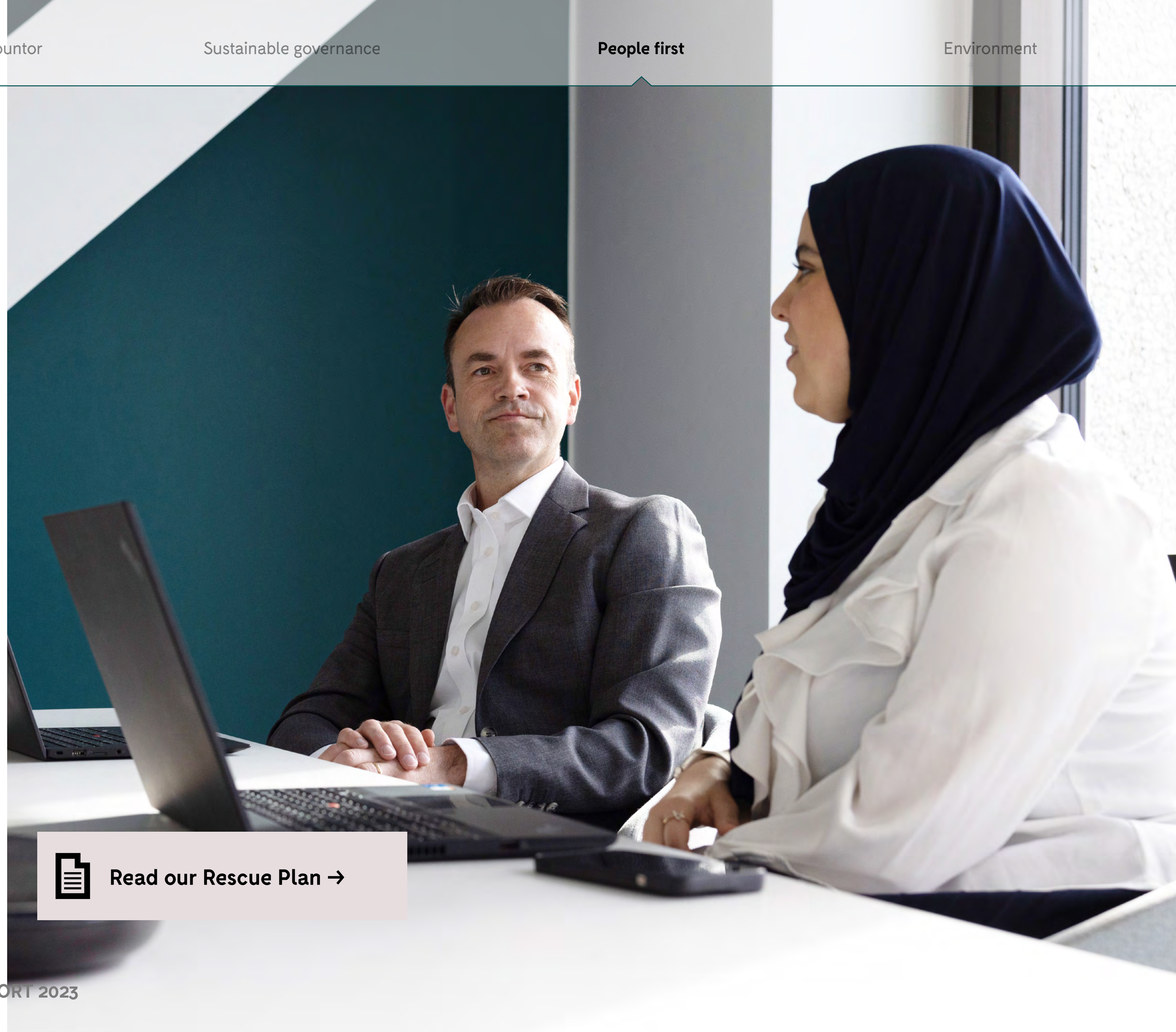


Accountor's Health and Safety Committee members and employees working in managerial or human resources positions have access to health and safety training.

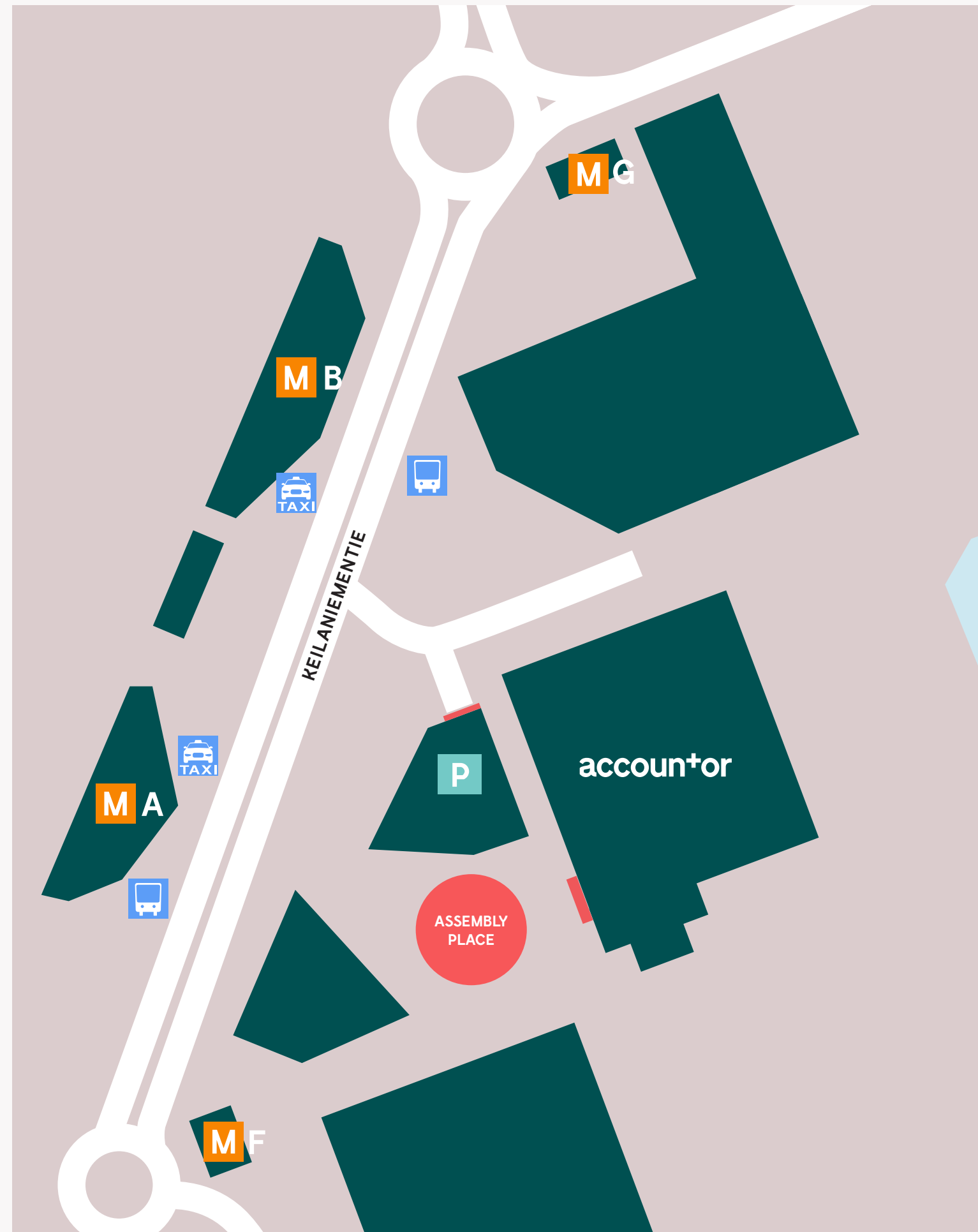
Access to online psychology consultant and worry hotline service is offered in our operating countries in collaboration with occupational health care service providers.

The sick leave percentage at Accountor increased from 3,74% (2022) to 3,99% due to increased number of sick leaves caused by different types of infection. The accident frequency rate was 1,11. Most of the accidents are related to commuting to work. We have never experienced a fatal accident.

The safety of each office is monitored by local occupational Health and Safety Councils. The hazard risk is evaluated in our risk management process quarterly. The headquarters office in Espoo, Accountor Tower, puts a special effort into fire safety due to the exceptional height of the building. Regular fire drills and rescue trainings are organised in addition to safety instructions in the site handbook.



[Read our Rescue Plan →](#)



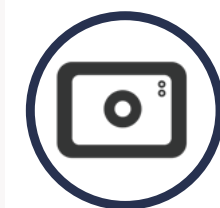
Security Services

- Security services are available at Accountor Tower and the security guard will come to the scene in case of emergency.
- Always keep your ID card visible so that the security guard can identify you.



Rescue

- You can find the Accountor Tower rescue plan at: [Accountor Tower rescue plan](#)



Surveillance cameras

- The cameras are a part of security services and help keep us and Accountor's property safe.
- There are cameras on every elevator lobby and on the 2nd and 3rd floors.



First aid

- You can find first aid kits at the recycling point of the copy room in each office floor as well as at the lobby service.
- If necessary, you can defibrillator at the lobby service.

4.5.2 Protecting employees from harassment

Accountor targets to provide psychologically safe working environment. To keep our employees safe, we are following up anonymously experienced bullying and harassment in People First survey and recognising whether harassment is by external or internal contact. Accountor offers additional specialised support service Someturva for employees to solve online harassment or bullying situation efficiently. During 2023, five employees sought help via Someturva. We also recognised 37 cases of harassment or bullying in our anonymous People First survey. 14 of the cases were resolved by the end of January 2024.

We have established bullying and harassment prevention and resolution practice to avoid escalation of cases and minimising the negative impact. Every suspected case is followed up and resolved according to early intervention practice as soon raised to the attention of HR, manager or employee representative.

The consistent and disciplined effort for psychological safety and prompt resolution of cases is visible in low experience of bullying. Total rate of bullying and harassment is 2% at Accountor while generally in Finland's labour market 15–28% employees report being bullied or harassed during the previous 12 months.

The number of the cases and the status of the open cases were followed up on and reported to the Accountor's Board of Directors as part of the annual ESG reporting.

4.5.3 The a+ hybrid working model

Our a+ hybrid working model enhances wellbeing and at the same time lowers our total carbon emissions due to less commute by our employees. We believe that providing our employees with the autonomy of choosing between our high-quality office environment or their home office provides employees the best opportunities to balance their life and increase their wellbeing.

Our a+ hybrid model gives teams and team members autonomy to balance remote and office work. It also provides a solid basis to create a sense of belonging and community by defining minimum amount of in person presence.

All our employees have a dedicated local office where they can choose to work within the a+ hybrid model in a safe and functional manner and benefit from occupational health services and other support. In 2023, satisfaction in remote work was rated positive by 77% of the employees.

Accountor's managers and teams meet in the office every second month, at minimum. The teams have the autonomy to define the interaction and meeting practices according to requirements of the jobs and team member preferences. For example, during the induction process every employee spends at least half of their working hours in the office with another employee.

The satisfaction concerning the functionality of our physical premises in 2023 was 3,83/5 or 66% positives which is on the same level as in 2022.

4.6 Customers' wellbeing

Our customers and their business are our top priority. In accordance with the United Nation's Sustainable Development Goal number 8, our services support economic growth and decent work for all our customers and their employees. We offer services and solutions that enable legal compliance and support information security, data protection, HR management and development. In short, we help our customers to implement formalised and sustainable governance methods.

At the same time, our services help our customers to be included in the ever-increasing digital development in our society.

We focus on our customer work in several ways. We have defined customer promises that guide our own work. We also engage our customers in open dialogue in our annual customer survey, low-threshold online services and active customer communication.

Accountor's customer promises

1. Delivered one time, on time.

We seek one-time delivery and keep our timetables. Our customers can feel safe and secure, knowing that we deliver as promised, at the right time and correctly.

2. Expertise close to you.

We ensure our customers easy access to the right expertise. We work closely with them, offering them just the right expertise and help. We are easy to reach through all channels and provide the full range of skills, near our customers.

3. Committed to active and clear communication.

We contact our customers if any issues or questions come up, or just to check that everything is okay. We make sure that they are always up to date about the state of their business and actively show that we care.



4.7 Giving back to the society

As a considerable employer, especially in Finland where we have approximately 1020 employees, we support United Nation's Sustainability Development Goal (SDG) number 8 of decent work and economic growth for our employees. In addition, our business affects the same topics for SDG 8 by providing economic growth and decent work to our customers and their employees.

In 2023, we continued our support to the people in Ukraine. In addition to helping our Ukrainian colleagues in many ways, we donated via Red Cross about 50 000 euros to provide humanitarian assistance to those most in need. In addition, our employees and customers selected to support the disadvantaged families and homeless as our annual winter holiday season charity cause.

Accountor Impact Day

We feel obliged to support and give back to society in various ways. In 2023, we offered Accountorians in Finland a possibility to use working time for voluntary charity work. We called all the activities Accountorians did as Accountor Impact Day. Based on the pilot results, the other country organisations will have a possibility to join to make an impact also in 2024.

During Accountor Impact Day, Accountorians carried out different good deeds that benefit people, companies, the society, or the world we live in. Teams and individuals used over 200 hours in different ways, including acting as phone operator for a fundraiser concert, making Christmas cards to lonely elderly people, cleaning litter from the Baltic Sea, and many more.



05 Environment

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5.1 Our environment in brief

We innovate and develop low-carbon financial and human resources management solutions and services. We aim to use all resources mindfully and avoid waste in digitalised hybrid way of working.

Our mission is to help our customers benefit from the new digital world of financial management, and human resources management and development. Together with our customers, we reduce our environmental footprints by using the full scale of digital solutions and services in efficient combination.

We are committed to reducing our carbon emissions consistently and comply fully with applicable environ-

mental regulation, contractual requirements and recognised good practices in our activities. We pride in maintaining zero environmental penalties.

At our offices, we recycle waste, monitor energy usage, and limit paper printing to reduce our ecological footprint. We handle hazardous waste (such as batteries for office supplies) carefully. However, due to our shared premises, we lack comprehensive data on waste generation across all offices. Our plans include embracing circular economy principles. This involves optimising resource utilisation, minimising waste, and designing processes that contribute to a regenerative system. Currently we concentrate on climate actions.

5.2 Climate work and carbon footprint

In 2023, Accountor has taken steps to follow our plan for climate change mitigation. Our commitment includes assessing our carbon footprint, engaging stakeholders, researching innovative solutions, aligning with plans, and setting clear targets. We recognise the urgency of addressing climate risks and will transparently report our progress in the coming years (E1–17).

Accountor is committed to actively managing its material impacts, risks, and opportunities related to climate change mitigation in alignment with the European Sustainability Reporting Standards (ESRS) guidelines. Please see the table on [page 17](#).

Our sustainability strategy addresses several key areas, including the reduction of greenhouse gas emissions, energy efficiency improvements, and the integration of renewable energy sources into our operations.

We continued our carbon inventory by applying Global Greenhouse Gas (GHG) protocol in collabora-

tion with global vendor, Climate Partner. In 2023, we calculated our Scope 1,2 and 3 greenhouse gas (GHG) emissions.

Scope 1 – fuel consumption

Our Scope 1 emission sources consist of our company cars. Accountor service business has 15 company cars in use.

Accountor does not have a company car policy to promote company vehicles and use of fuels is minimal. Our target is to enhance commuting by public transport or e.g. by bike. Our office spaces are not consuming direct energy (fuels).

For these reasons our Scope 1 emission are very low and moderate. In 2023, Scope 1 was 1% of the service business' Scope emissions.

Scope 2 – purchased energy

Our a+ Hybrid working model helps to reduce greenhouse gas emissions by reducing our need for office space. Hybrid working and use of renewable



energy provide the biggest opportunities to cut our carbon Scope 2 indirect energy use emissions further.

At the end of 2023, Accountor had about 29 000 m² of office space in six countries. In 2023, we continued improving our offices to provide diverse zones to match the nature of tasks and ensure a sustainable use of space to reduce our greenhouse gas emissions. 4500 m² less office space means 10% decrease in our office space during 2023. This was reached by implementing our a+ hybrid office concept to new locations and by altering, combining and relinquishing offices.

In 2023, we collected more specific information about our energy consumption from our biggest offices in our operating countries. We have been able to increase the amount of guarantee of origin certificates on renewable energy use at our offices.

In 2023, Scope 2 was 29% of the service business Scope emissions.

Scope 3

To build a foundation for further improvement of our Scope 3 calculations, we collected activity-based data from various sources. In 2023, Scope 3 was 70% of Accountor’s service business Scope emissions.

Category 1 – Purchased goods and services

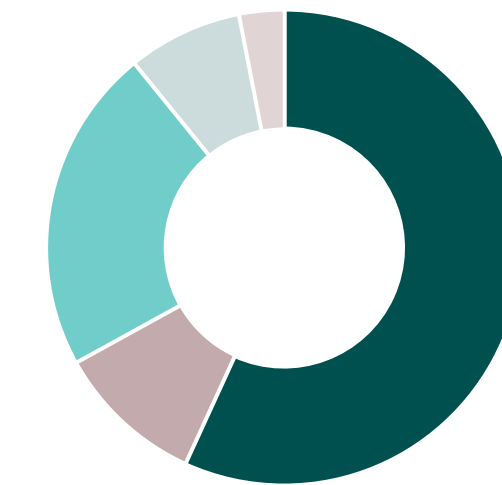
Our CO₂ calculation on purchased goods and services does not yet cover our procured items in full. At this stage, the main part of our Scope 3 Cat.1 emissions derives from external data centre services and from the hardware devices in use.

Accountor will expand its Scope 3 calculations to a broader set of services in the future. Our aim is to include more services in the calculation.

Category 3 – Fuel- and energy-related activities

These emissions are linked with our decreasing Scope 1–2 emissions. Together with our partner we calculate the emissions not yet included in our Scope 1–2 emissions. These emission are formed from e.g. refining, producing and transportation of the fuels and energy used.

Service Business CO₂ footprint by country



Finland	57 %
Sweden	10%
Norway	22 %
Denmark	8 %
Netherlands	3 %

Category 6 - Business travel

Accountor promotes its employees to consider the necessity of a business trip in each case before choosing to travel. We encourage to organise meetings in an eco-friendly and cost-effective way. Conference call equipment and software is widely available at all Accountor offices, and most meetings and negotiations can be done virtually. Business travelling reporting was continued as before. We collect flight, train, taxi and other public transport data from our own systems and from our travel agency to measure our business travel carbon footprint.

Category 7 - Employee commuting

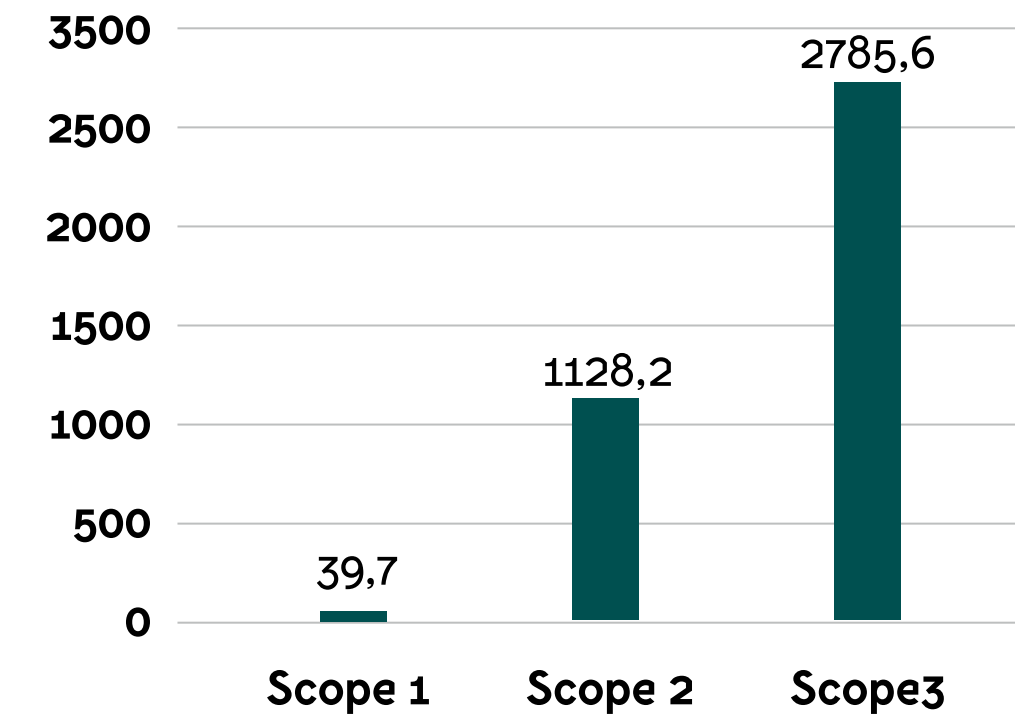
We re-executed a commuting survey for all employees to closely examine our ways of commuting to work. The main results from the survey stated that a third of Accountorians drive to work, and the proportion of e-car users is six percent. Most of Accountor employees commute to the office

two days a week. The a+ Hybrid office strategy requires new premises to be accessible by public transportation.

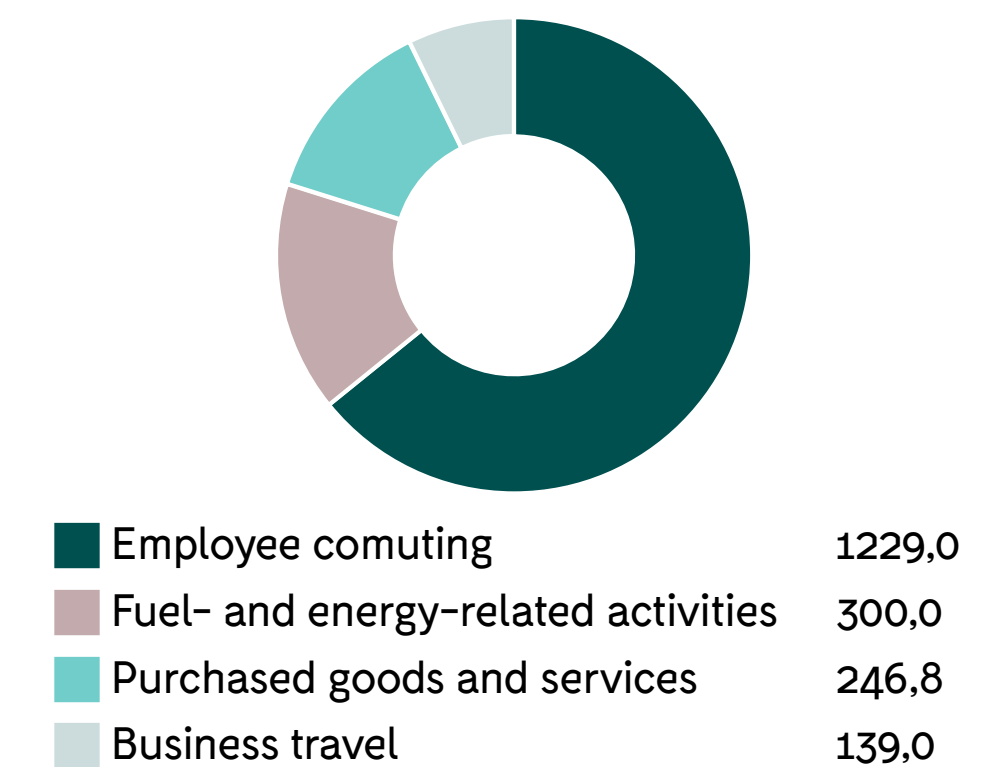
We have set a target to cut carbon emissions per full-time employee (FTE) every year with 10% between 2020 and 2026. During 2023, Accountor’s services business’ carbon footprint was 2,75 tCO₂ per FTE (2022: 2,98). The 2023 calculation is based on average of 1 437 FTEs. The decrease of tCO₂/FTE is partly due to the higher FTE in 2023, but also because of due to e.g. office space efficiency increase.

The 2023 carbon emission report provides a solid baseline for comparison and defines key contributors of our carbon emissions. Our goal is to have our total Scope 3 footprint covered in more detail. Accountor also seeks possibilities to implement The Science Based Targets initiative (SBTi) in the future.

Service business tCO₂ footprint 2023



Service business Scope 3 footprint breakdown (tCO₂)



		Finland	Sweden	Norway	Denmark	Netherlands	All	
Scope 1		15,8	0,0	0,0	5,3	18,6	39,7	1 %
Vehicle fleet		14,0	0,0	0,0	5,3	18,6	37,9	
Refrigerant leakage		1,8	0,0	0,0	0,0	0,0	1,8	
Scope 2		612,4	85,8	295,8	116,0	18,2	1128,2	29 %
Purchased heating, steam, and cooling for own use	Heat (purchased)	254,4	26,3	139,9	41,0	0,0	461,7	
	Purchased cooling	9,6	6,8	5,6	2,0	0,0	24,0	
			31,6	145,5	43,0	0,0	220,2	
Purchased electricity for own use	Electricity (stationary)	348,4	21,0	4,7	29,9	18,2	422,3	
Scope 3		1618,8	314,8	581,4	187,9	82,7	2785,6	70 %
Employee commuting	Employee Commuting	632,9	91,6	355,0	105,8	43,7	1229,0	
	Home office	259,4	91,1	22,8	12,8	6,4	392,5	
Fuel- and energy-related activities	Upstream emissions cooling	151,8	70,2	57,4	20,6	0,0	300,0	
	Upstream emissions heat	157,4	7,7	63,4	19,6	0,1	248,2	
	Upstream emissions vehicle fleet	3,6	0,0	0,0	1,2	4,8	9,7	
	Upstream emissions electricity	64,5	9,5	14,3	6,1	4,1	98,4	
			0,0					
Purchased goods and services	Electronic devices	193,8	15,0	8,2	11,0	18,8	246,8	
	External data centre	0,9	0,0	0,0	0,1	0,0	1,0	
Business travel	Rental and private vehicles	81,5	15,4	34,5	7,6	0,0	139,0	
	Flights	52,4	8,2	21,9	2,8	4,6	89,8	
	Hotel nights	14,6	5,5	3,5	0,3	0,3	24,1	
	Rail	6,0	0,6	0,5	0,0	0,0	7,1	
	Overall results	2247,1	400,6	877,2	309,2	119,5	3953,5	
	% of all emissions	57 %	10 %	22 %	8 %	3 %		
	Service business FTE average 2023	1 437 FTEs						
	tCO ₂ / FTE	2,75						

06 Appendices

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Appendix 2: Accountor structure	70

Appendix 1: GRI Content Index

We have reported the information cited in this GRI content index for the period FY 2022 with reference to the GRI Standards and UN SDGs.



GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI 2: General disclosures	1. The organization and its reporting practices	2-1	Organizational details		1.1 Organisation 1.3 Stakeholders (Owners and investors) 3.1 Business ethics and policies (Corporate Governance of Accountor Group) Appendix 2: Accountor Structure		
GRI 2: General disclosures	1. The organization and its reporting practices	2-2	Entities included in the organization's sustainability reporting	ESRS 1 5.1; ESRS 2 BP-1 §5 (a) and (b) i	2.6 Reporting conventions		Accountor does not to specify the differences between the entities included in our financial reporting and the entities included in this sustainability report, because it is not public information.
GRI 2: General disclosures		2-3	Reporting period, frequency and contact point	ESRS 1 §73	2.5 Reporting conventions		
GRI 2: General disclosures	1. The organization and its reporting practices	2-5	External assurance		2.6 Reporting conventions		
GRI 2: General disclosures		2-6	Activities, value chain and other business relationships	ESRS 2 SBM-1 §40 (a) i to (a) ii, (b) to (c), §42 (c)	1.1 Organisation 1.4 Stakeholders	4 8 10 16	
GRI 2: General disclosures		2-7	Employees	ESRS 2 SBM-1 §40 (a) iii; ESRS S1 S1-6 §50 (a) to (b) and (d) to (e), §51 to §52	4.3 Labour management	8 10	Employees are reported as headcount: number of employees on the last day of reporting period 31.12.2023. If reported as FTE - it means full time equivalent, calculated according to 7,5 hour working day and 220 working days annually either in the end of period or monthly average 2023, as mentioned in chart.
GRI 2: General disclosures	2. Activities and workers	2-8	Workers who are not employees	ESRS S1 S1-7 §55 to §56	4.3.1 External workforce	8 10	



GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI 2: General disclosures		2-9	Governance structure and composition	ESRS 2 GOV-1 §21, §22 (a), §23; ESRS G1 §5 (b)	3.1.2 Corporate Governance of Accountor group 4.4. Inclusion and equality		
GRI 2: General disclosures		2-10	Nomination and selection of the highest governance body		3.1.2 Corporate governance of Accountor group		Accountor board members are selected in annual general meeting.
GRI 2: General disclosures	3. Governance	2-11	Chair of the highest governance body		3.1.2 Corporate governance of Accountor group		
GRI 2: General disclosures		2-12	Role of the highest governance body in overseeing the management of impacts	ESRS 2 GOV-1 §22 (c); GOV-2 §26 (a) to (b); SBM-2 §45 (d); ESRS G1 §5 (a)	2.4. Managing our sustainability		
GRI 2: General disclosures	3. Governance	2-13	Delegation of responsibility for managing impacts	ESRS 2 GOV-1 §22 (c) i; GOV-2 §26 (a); ESRS G1 G1-3 §18 ©	2.4. Managing our sustainability		
GRI 2: General disclosures	3. Governance	2-14	Role of the highest governance body in sustainability reporting	ESRS 2 GOV-5 §36; IRO-1 §53 (d)	2.4. Managing our sustainability		
GRI 2: General disclosures		2-15	Conflicts of interest		3.1.1 Code of Conduct 3.1.2 Corporate Governance of Accountor group		
GRI 2: General disclosures		2-16	Communication of critical concerns	ESRS 2 GOV-2 §26 (a); ESRS G1 G1-1 AR 1 (a); G1-3 §18 ©	2.2.1 Material Topics 3.3 Risk Management		
GRI 2: General disclosures		2-17	Collective knowledge of the highest governance body	ESRS 2 GOV-1 §23	3.1.2 Corporate Governance of Accountor group		Accountor does not train the members of the Board of Directors.
GRI 2: General disclosures		2-19	Remuneration policies	ESRS 2 GOV-3 §29 (a) to (c); ESRS E1 §13	4.4.2 Executive and board remuneration		
GRI 2: General disclosures		2-20	Process to determine remuneration	ESRS 2 GOV-3 §29 (e)	4.4.2 Executive and board remuneration	16	Evli Alexander executive compensation survey is considered in annual remuneration plan.
GRI 2: General disclosures		2-21	Annual total compensation ratio	ESRS S1 S1-16 §97 (b) to (c)	4.4.2 Executive and board remuneration		
GRI 2: General disclosures	4. Strategy, policies and practices	2-22	Statement on sustainable development strategy	ESRS 2 SBM-1 §40 (g)	2.2.2 Our sustainability priorities and targets	10	



GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI 2: General disclosures		2-23	Policy commitments	ESRS 2 GOV-4; MDR-P §65 (b) to (c) and (f); ESRS S1 S1-1 §19 to §21, and §AR 14; ESRS S2 S2-1 §16 to §17, §19, and §AR 16; ESRS S3 S3-1 §14, §16 to §17 and §AR 11; ESRS S4 S4-1 §15 to §17, and §AR 13; ESRS G1G1-1 §7 and §AR 1 (b)	3.1 Business ethics and policies		No attention to any specific stakeholder group.
GRI 2: General disclosures		2-24	Embedding policy commitments	ESRS 2 GOV-2 §26 (b); MDR-P §65 (c); ESRS S1 S1-4 §AR 35; ESRS S2 S2-4 §AR 30; ESRS S3 S3-4 §AR 27; ESRS S4 S4-4 §AR 27; ESRS G1 G1-1 §9 and §10 (g)	3.1.1 Code of Conduct	10	
GRI 2: General disclosures		2-25	Processes to remediate negative impacts	ESRS S1 S1-1 §20 (c); S1-3 §32 (a), (b) and (e), §AR 31; ESRS S2 S2-1 §17 (c); S2-3 §27 (a), (b) and (e), §AR 26; S2-4 §33 (c); ESRS S3 S3-1 §16 (c); S3-3 §27 (a), (b) and (e), §AR 23; S3-4 §33 (c); ESRS S4 S4-1 §16 (c); S4-3 §25 (a), (b) and (e), §AR 23; S4-4 §32 (c)	5.1 Our environment in brief		
GRI 2: General disclosures		2-26	Mechanisms for seeking advice and raising concerns	ESRS S1 S1-3 §AR 32 (d); ESRS S2 S2-3 §AR 27 (d); ESRS S3 S3-3 §AR 24 (d); ESRS S4 S4-3 §AR 24 (d); ESRS G1 G1-1 §10 (a); G1-3 §18 (a)	3.1.2 Corporate governance of Accountor group 4.5.1 General wellbeing and development of occupational health and safety		
GRI 2: General disclosures		2-27	Compliance with laws and regulations	ESRS 2 SMB-3 §48 (d); ESRS E2 E2-4 §AR 25 (b); ESRS S1 S1-17 §103 (c) to (d) and §104 (b); ESRS G1 G1-4 §24 (a)			No fines or significant instances of noncompliance with laws and regulations.
GRI 2: General disclosures		2-28	Membership associations		1.4 Stakeholders		
GRI 2: General disclosures		2-29	Approach to stakeholder engagement	ESRS 2 SMB-2 §45 (a) i to (a) iv; ESRS S1 S1-1 §20 (b); S1-2 §25, §27 (e) and §28; ESRS S2 S2-1 §17 (b); S2-2 §20, §22 (e) and §23; ESRS S3 S3-1 §16 (b); S3-2 §19, §21 (d) and §22; ESRS S4 S4-1 §16 (b); S4-2 §18, §20 (d) and §21	1.4 Stakeholders 2.2.1 Materiality assessment		
GRI 3: Material topics	5. Stakeholder engagement	3-1	Process to determine material topics	ESRS 2 BP-1 §AR 1 (a); IRO-1 §53 (b) ii to (b) iv	2.2.1 Materiality assessment		



GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI 3: Material topics	5. Stakeholder engagement	3-2	List of material topics	ESRS 2 SBM-3 §48 (a) and (g)	2.2.1 Materiality assessment		
GRI 3: Material topics	5. Stakeholder engagement	3-3	Management of material topics	ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv; MDR-P, MDRA, MDR-M, and MDR-T; ESRS S1S1-2 §27; S1-4 §39 and AR 40 (a); S1-5 §47 (b) to (c); ESRS S2 S2-2 §22; S2-4 §33, §AR 33 and §AR 36 (a); S2-5 §42 (b) to (c); ESRS S3 S3-2 §21; S3-4 §33, §AR 31, §AR 34 (a); S3-5 §42 (b) to (c); ESRS S4 S4-2 §20, S4-4 §31, §AR 30, and §AR 33 (a); S4-5 §41 (b) to (c)	2.2.1 Materiality assessment		
GRI 201: Economic performance		201-1	Direct economic value generated and distributed				Accountor's financial information is not publicly shared information.
GRI 201: Economic performance		201-4	Financial assistance received from government				No other material subsidies or grants received.
GRI 202: Market Presence		202-1	Ratios of standard entry level wage by gender compared to local minimum wage	ESRS S1 S1-10 §67-71 and §AR 72 to 73		10	Not a significant proportion of employees are compensated based on wages subject to minimum wage rules.
GRI 205: Anti-corruption		205-2	Communication and training about anti-corruption policies and procedures	ESRS G1 G1-3 §20, §21 (b) and (c) and §AR 7 and 8	3.1.1 Code of Conduct 3.4. Supply chain management 4.2. Competence Development	16	Accountor does not train the members of the Board of Directors.
GRI 205: Anti-corruption		205-3	Confirmed incidents of corruption and actions taken	ESRS G1 G1-4 §25		16	No corruption incidents.
GRI 206: Anti-competitive Behavior		206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices			16	No legal actions.
GRI 207: Tax		207-1	Approach to tax		3.1.3 Tax principles	16	
GRI 207: Tax		207-2	Tax governance, control and risk management		3.1.3 Tax principles		
GRI 302: Energy		302-1	Energy consumption within the organisation	ESRS E1 E1-5 §37; §38; §AR 32 (a), (c), (e) and (f)	5.2 Carbon footprint		Reported in Climate Partner calculation. Majority of Accountor premises electricity consumption 2023 is in Finland, and equals to 1 194 770 kWh.



GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI 305: Emissions		305-1	Direct (Scope 1) GHG emissions	ESRS E1 E1-4 §34 (c); E1-6 §44 (a); §46; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; AR §43 (c) to (d)	5.2 Carbon footprint		
GRI 305: Emissions		305-2	Energy indirect (Scope 2) GHG emissions	ESRS E1 E1-4 §34 (c); E1-6 §44 (b); §46; §49; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; §AR 45 (a), (c), (d), and (f)	5.2 Carbon footprint		
GRI 305: Emissions		305-3	Other indirect (Scope 3) GHG emissions	ESRS E1 E1-4 §34 (c); E1-6 §44 (c); §51; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 46 (a) (i) to (k)	5.2 Carbon footprint		
GRI 305: Emissions		305-4	GHG emissions intensity	ESRS E1 E1-6 §53; §54; §AR 39 (c); §AR 53 (a)	5.2 Carbon footprint		Intensity equals emissions per FTE.
GRI 305: Emissions		305-5	Reduction of GHG emissions	ESRS E1 E1-3 §29 (b); E1-4 §34 (c); §AR 25 (b) and (c); E1-7 §56	5.2 Carbon footprint		
GRI 308: Supplier Environmental Assessment		308-2	Negative environmental impacts in the supply chain and actions taken	ESRS 2 SBM-3 §48 (c) i and iv	3.4 Supply chain management		
				ESRS E1-1 §17	5.2 Climate work and carbon footprint		
				ESRS E1-2 §22-25 E1.SBM-3 ESRS 2 IRO-1	2.2.1 Material topics 5.2 Climate work and carbon footprint		Scope 2 emissions, DMA Climate Change.
GRI 401: Employment		401-1	New employee hires and employee turnover	ESRS S1 S1-6 §50 (c)	4.1.3. Employee turnover 4.4. Inclusion	8	
GRI 401: Employment		401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	ESRS S1 S1-11 §74; §75; §AR 75		8	Employment type or duration does not have impact on benefits offered, as required by law in operating countries.
GRI 401: Employment		401-3	Parental leave	ESRS S1 S1-15 §93	4.4 Inclusion and equality	8	



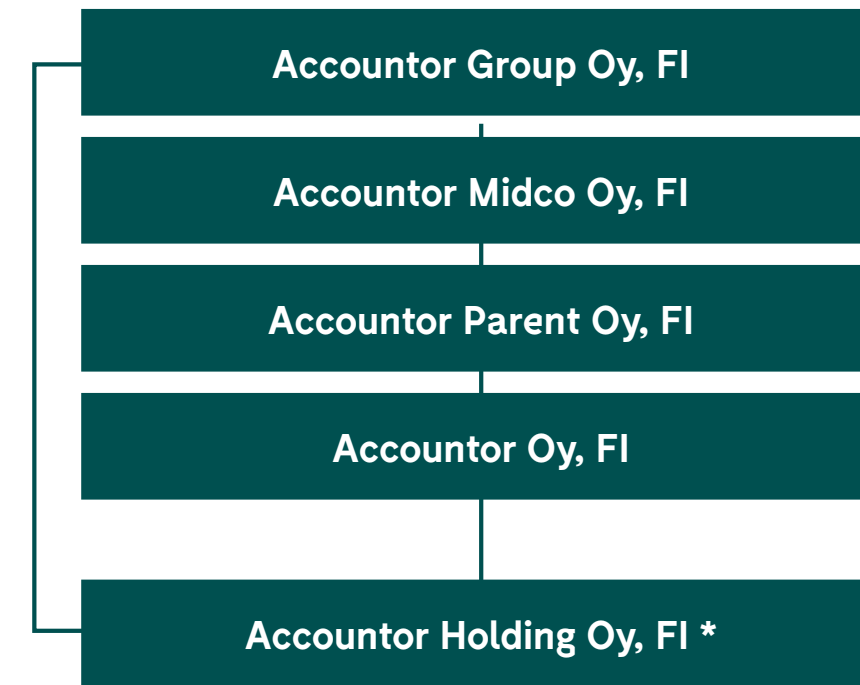
GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI 402: Labor/ Management Relations		402-1	Minimum notice periods regarding operational changes	Social dialogue' and 'Collective bargaining' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entity-specific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M.		8	Accountor countries comply with local legislation requiring minimum 3 weeks consultation with employee before change decisions can be made.
GRI403: Occupational health and safety		403-1	Occupational health and safety management system	ESRS S1 S1-1 §23	4.5.1. General wellbeing and development of occupational health and safety	4 8	
GRI403: Occupational health and safety		403-2	Hazard identification, risk assessment and incident investigation	ESRS S1 S1-3 §32 (b) and §33	3.3. Risk Management	16	Accountor risk management process covers hazard risks.
GRI403: Occupational health and safety		403-3	Occupational health services	Health and safety' and 'Training and skills development' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this GRI disclosure is covered by MDR-P, MDR-A, MDR-T, and/or as an entityspecific metric to be disclosed according to ESRS 1 §11 and pursuant to MDR-M	4.5.1 General well being and development of occupational health and safety	8	
GRI403: Occupational health and safety		403-4	Worker participation, consultation, and communication on occupational health and safety		4.5. a+ Hybrid and wellbeing	8	
GRI403: Occupational health and safety		403-5	Worker training on occupational health and safety		4.5.1 General well being and development of occupational health and safety	8	
GRI403: Occupational health and safety		403-6	Promotion of worker health		4.5.1 General wellbeing and development of occupational health and safety	8	
GRI403: Occupational health and safety		403-8	Workers covered by an occupational health and safety management system	ESRS S1 S1-14 §88 (a); §90	4.5. a+Hybrid and wellbeing	8	Accountor employees are covered by health and safety services. External workers not employed by Accountor have access to their employers occupational health care service.



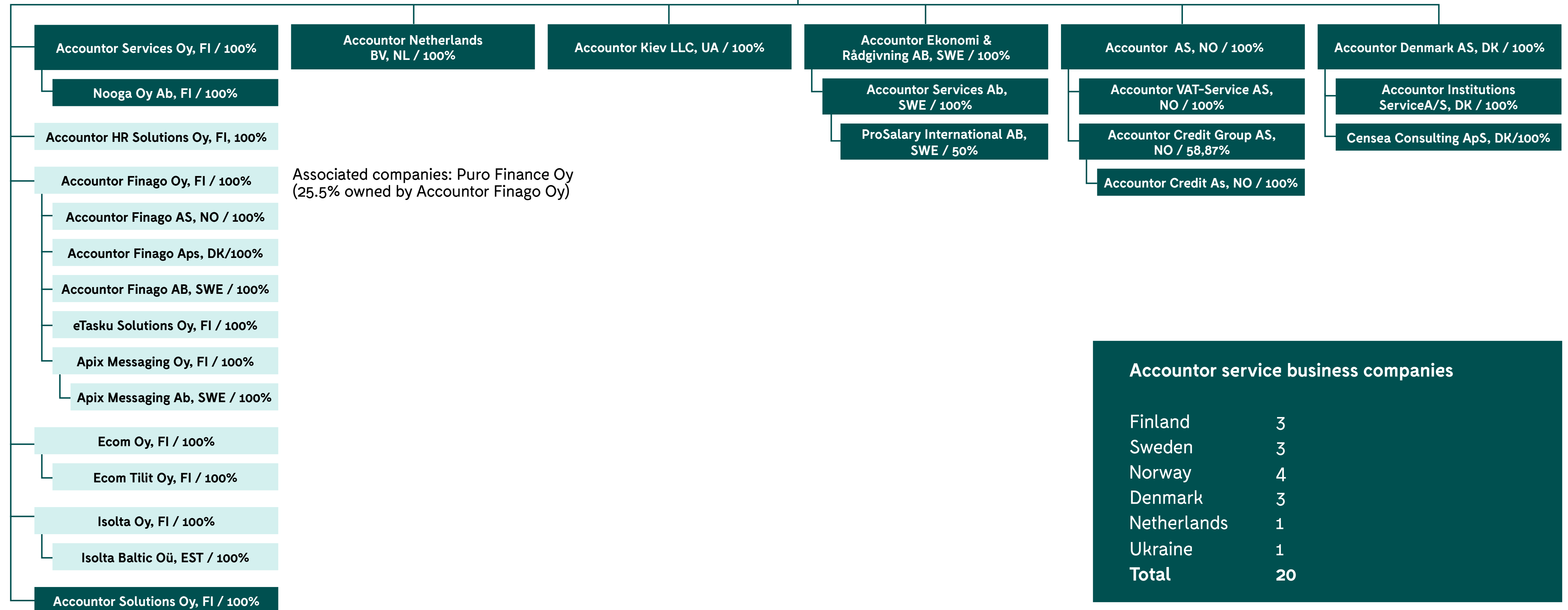
GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI403: Occupational health and safety		403-9	Work-related injuries	ESRS S1 S1-4, §38 (a); S1-14 §88 (b) and (c); §AR 82	4.5.1 General well being and development of occupational health and safety		Accident frequency rate in software business 2,24, severity rate 0 (based on calculations per 1 000 000 hours worked).
GRI403: Occupational health and safety		403-10	Work-related ill health	ESRS S1 S1-4, §38 (a); S1-14 §88 (b) and (d); §89; §AR 82			No work-related ill health.
GRI404: Training and Education		404-1	Average hours of training per year per employee	ESRS S1 S1-13 §83 (b) and §84	4.2 Competence Development	4	
GRI404: Training and Education		404-2	Programs for upgrading employee skills and transition assistance programs	ESRS S1 S1-1 §AR 17 (h)	4.2. Competence development 4.4. Inclusion and equality	4 10	
GRI404: Training and Education		404-3	Percentage of employees receiving regular performance and career development reviews	ESRS S1 S1-13 §83 (a) and §84		4	100% of employees are offered career and performance development discussions minimum once a year.
GRI 405: Diversity and equal opportunity		405-1	Diversity of governance bodies and employees	ESRS 2 GOV-1 §21 (d); ESRS S1 S1-6 §50 (a); S1-9 §66 (a) to (b); S1-12 §79	4.4 Inclusion and equality	10	
GRI 405: Diversity and equal opportunity		405-2	Ratio of basic salary and remuneration of women to men	ESRS S1 S1-16 §97 and §98	4.4.1. Motivating compensation	8 10	
GRI 406: Non-discrimination		406-1	Incidents of discrimination and corrective actions taken	ESRS S1 S1-17 §97, §103 (a), §AR 103	4.5.1 General wellbeing and development of occupational health and safety	10	
GRI 414: Supplier Social Assessment		414-2	Negative social impacts in the supply chain and actions taken	ESRS 2 SBM-3 §48 (c) i and iv	3.4 Supply Chain Management		Assessment procedure since 2022, no negative impacts detected.
GRI 415: Public policy		415-1	Political contributions	ESRS G1 G1-5 §29 (b)		16	Accountor has not any monetary contribution to in-kind political activity.
GRI 418: Customer Privacy		418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	ESRS S4 S4-3 §AR 23; S4-4 §35	3.2 Information security and data protection	16	

Appendix 2: Accountor structure

At the end of the year 2023, Accountor service business consists of 20 companies. In this report we cannot specify the differences between the list of entities included in our financial reporting and the list included in this sustainability report, because it is not public information.



* Accountor Holding Oy's ownership: Accountor Oy 85,36%, Accountor Group Oy 14,26% and Accountor Services Oy 0,38%



Accountor service business companies	
Finland	3
Sweden	3
Norway	4
Denmark	3
Netherlands	1
Ukraine	1
Total	20