



elisa

SUSTAINABILITY

2021

ANNUAL REVIEW
FINANCIALS
REMUNERATION
GOVERNANCE

Digital sustainability



p.11

Social sustainability



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Economic sustainability



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Environmental sustainability



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Description of the report

Elisa's sustainability report for 2021 is a statement of Elisa's non-financial information and includes information in accordance with the EU Taxonomy Regulation. The report forms part of Elisa's annual report, which is published in Finnish and English and consists of five parts: an annual review, a sustainability report, financial statements, a corporate governance statement and a remuneration statement. The entire annual report is available at elisa.com/corporate/investors/annual-report/.

This verified sustainability report has been prepared primarily according to the Core requirements of the Global Reporting Initiative (GRI) Standards, but also including some indicators according to the Comprehensive requirements. Elisa also reports non-financial information with reference to the SASB (Sustainability Accounting Standards Board) framework. We do not currently report all the indicators included in the standard, but we will also continue to evaluate them in future. In addition, the Nasdaq Nordic ESG Reporting Guide has been taken into account in preparing the report. ESG index 2021 includes GRI, SASB and our own indicators and is part of the report.

Elisa also publishes climate-related financial information in accordance with the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations in a separate TCFD report, which is available on [our website](#).

Elisa's sustainability reports are verified by a third party. The 2021 corporate sustainability report is verified by KPMG Oy Ab. The limited verification covers the sustainability section of Elisa's 2021 annual report.

The reporting period is the calendar year 2021.

The reporting of key aspects covers all of the business functions and subsidiaries included in Elisa's consolidated financial statements: Consumer Customers, Corporate Customers, Production, Support and the subsidiaries.

The reporting corresponds to the reporting scope of Elisa Group. For some indicators, the scope has been limited due to a lack of reliable information. Any deviations due to these limitations or changes in calculation methods are indicated alongside the relevant indicators. We will continue to develop the coverage of our reporting in these respects. The financial information in this report comes from the consolidated financial statements, and it complies with IFRS accounting principles.

With regard to environmental indicators, the most significant environmental effects of the parent company and its subsidiaries have been calculated in accordance with GRI guidelines. The calculation of carbon dioxide emissions is based on the Greenhouse Gas Protocol Corporate Standard. The figures for Scope 3 emissions are reported according to the GHG Protocol Corporate Value Chain Standard. The reporting of Scope 2 emissions takes into account GHG Protocol Scope 2 instructions. For a description of the calculation method, please see our corporate sustainability website. With regard to personnel, figures for both the parent company and subsidiaries are included. Structural changes in the Group are presented in more detail in the annual report.



This is Elisa's ninth verified sustainability report, and the publication date for the 2021 report is 15 March 2022. Previous reports are available at elisa.com/corporate/investors/.

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Sustainability



Investor relations

Sustainability at Elisa

Elisa's mission is a sustainable future through digitalisation. Accordingly, we tackle common issues that are important for people, society and sustainable development.

We are a trailblazer in the provision of telecommunications and digital services, and our business goal is to provide value and sustainable solutions for society and our customers.

Comprehensive, reliable and fast data communication connections are a prerequisite for a competitive and equitable information society. As our operating environment is becoming increasingly digital, we play a key role in influencing society and the operating and working environments of companies and citizens in our main market areas, Finland and Estonia, as well as internationally.

We are committed to the UN Global Compact and are signatories to the UN Women's Empowerment Principles. We respect human rights and international anti-corruption conventions in all countries where we operate and in our partner network.

It is essential for us to promote:

- Protection of everyone's privacy by ensuring safe digital environments
- A fair and inclusive digital society
- Innovation
- Resource efficiency and measures to combat climate change



By building a sustainable future through digitalisation, we are contributing to the UN Sustainable Development Goals, which are essential to our operations. We can both reduce the negative impact of our own operations (sustainability footprint) and provide sustainable digital solutions to customers and other stakeholders (sustainability handprint).



Good governance

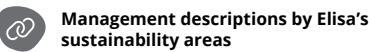
We comply with legislation and our Code of Conduct in everything we do, and we expect our partners to do the same. Elisa's Code of Conduct defines how we operate based on our values. Elisa Corporation observes the Finnish Corporate Governance Code from the Securities Market Association.



Management of corporate responsibility

Material aspects of sustainability at Elisa are discussed and approved by Elisa Corporate Responsibility Management Board, Elisa Executive Board and the Board's Audit Committee. Elisa's Board of Directors confirms and signs off on the annual responsibility report, including the non-financial information.

In 2021, Elisa Corporate Responsibility Management Board met six times, and themed working groups met once every quarter.



Development and measurement

Sustainability has been part of Elisa's strategy since 2009. In 2021, the main focus areas for our strategic sustainability actions were ensuring digital trust, promoting equality and equal opportunities, and driving innovation in both material and energy efficiency, as well as fostering a shared understanding of our mission. The measures taken in these priority areas form part of our business strategies and action plans, and they are described in more detail by area in this report.

As part of the strategy process, we have updated Elisa's sustainability focus areas starting from 2022. We have also assessed and prioritised those UN Sustainable Development Goals that we can significantly influence through our own actions. We are involved in building sustainable industry, innovation and infrastructure (SDG 9), reducing inequality (SDG 10), taking climate action (SDG 13) and promoting peace, justice and strong institutions (SDG 16).

We have set specific targets and success indicators for the different areas of sustainability. In addition to these, we monitor stakeholders' perceptions of our success with the Sustainability metric. This is also one of Elisa's strategic scorecard indicators. Elisa's sustainability is monitored monthly as part of consumer and corporate customer surveys in Finland and Estonia. The surveys ask 8,000 respondents whether Elisa is a responsible actor in society. The results of the surveys guide our actions to develop our responsible practices.

In 2021, we used a monthly internal survey to monitor how Elisa's mission guides people's daily decisions at work. Elisa employees had discussions in mission workshops to build a common understanding of what a sustainable future and sustainability mean in our daily work. More than 93% of Elisa's teams have already taken part in a mission workshop.

Elisa corporate responsibility governance model





We utilised data and artificial intelligence to help society as the COVID-19 pandemic continued.

Risk management

Risk management is an essential part of Elisa's internal control system. It aims to ensure that risks affecting the company's business are identified, influenced and monitored. The company classifies risks into strategic, operational, insurable and financial risks. The material sustainability risks and mitigation methods are introduced within each sustainability area.

COVID-19 measures

The coronavirus pandemic continued to affect our operating environment in 2021. We focused on providing sustainable and innovative digital solutions for our customers, and on ensuring a safe and secure working and service environment.

Our persistent development of flexible ways of working proved to be a significant advantage for Elisa and its employees. Despite the restrictions on mobility, we were able to carry on working safely, thanks to the remote working culture we have adopted. Based on the results of the annual commuting survey, Elisa employees worked an average of 3.45 remote days per week as the exceptional circumstances continued (measurement period November 2021, N = 2,362).

We ensured the safety of our staff and customers, and we made sure there was an orderly transition between hybrid and remote working models in response to the pandemic. We won the Work Environment of the Year award from RAKLI (a Finnish association of property owners and construction clients) and the Finland Chapter of the International Facility Management Association thanks to the support we provided for Elisa employees and our

partners in the switch to remote working during the pandemic, enabled through digitalisation.

We paid special attention to providing well-functioning and easy-to-use remote services. At the outset of the pandemic, we set up a virtual shop, and we have continued to provide free digital support in the use of online services. We stepped up nationwide home delivery services and safe in-store device pick-ups. Our Omaguru service offers remote support to assist our customers in setting up and troubleshooting all the devices they have at home, while Yritysguru provides the same assistance to businesses.

Furthermore, our customers and stakeholders can experience these services both live and virtually in Elisa's 5G Showroom. We also enabled virtual live visits to our network management centre and IT service production for our corporate customers.

During the year, we came to society's aid in many ways with the help of data and artificial intelligence. In Finland, the Helsinki University Hospital (HUS) used smart snapshots and anonymised mobility data provided by Elisa to predict the spread of the pandemic. The snapshot solution developed by Elisa for HUS utilises data collection, aggregation, analysis, automation and visualisation to monitor and forecast the coronavirus situation.

In Estonia, we partnered with MindTitan to analyse anonymised online data to determine the extent to which people were following the travel advice from the public authorities during the pandemic. During the COVID-19 restrictions, we analysed mobility data in Estonia for the public and private sectors, and we also published the data on [our Estonian website](#).



Elisa's measures during the exceptional situation caused by COVID-19

Commitments

Elisa is committed to the principles of the UN Global Compact and is proud to bear its responsibility for global sustainable development. Our commitments and climate action include

- Science Based Targets initiative (SBTi)
- The Climate Pledge initiative
- Finnish Energy Efficiency Agreement for Industries

In 2021, we were among the first companies to sign up to the Climate Pledge. We also became a member of Inklusiiv Community, which promotes diversity.

Our determined work to improve quality and the customer experience was rewarded when Elisa became the first telecom operator in the world to receive the highly significant six-star certificate in the EFQM Global Award assessment. We also received the 2021 Finnish Quality Award from Excellence Finland.

For the second year in a row, Finnish consumers chose Elisa as the most responsible company in its industry in the Sustainable Brand Index survey. Elisa

was the only Finnish company to make it into the top ten of the Financial Times European Climate Leaders 2021 list. Elisa and Polystar achieved Silver level in EcoVadis' sustainability assessment.



Elisa's memberships and commitments

Stakeholder dialogue

Active stakeholder dialogue is an important part of the daily development of Elisa's business operations and sustainability. We are engaged in a continuous dialogue with our stakeholders through regular meetings and a number of questionnaires and surveys. Regular assessment of the material aspects and social and business impact of our operations is an important part of our sustainability work in Elisa Corporate Responsibility Management Board.



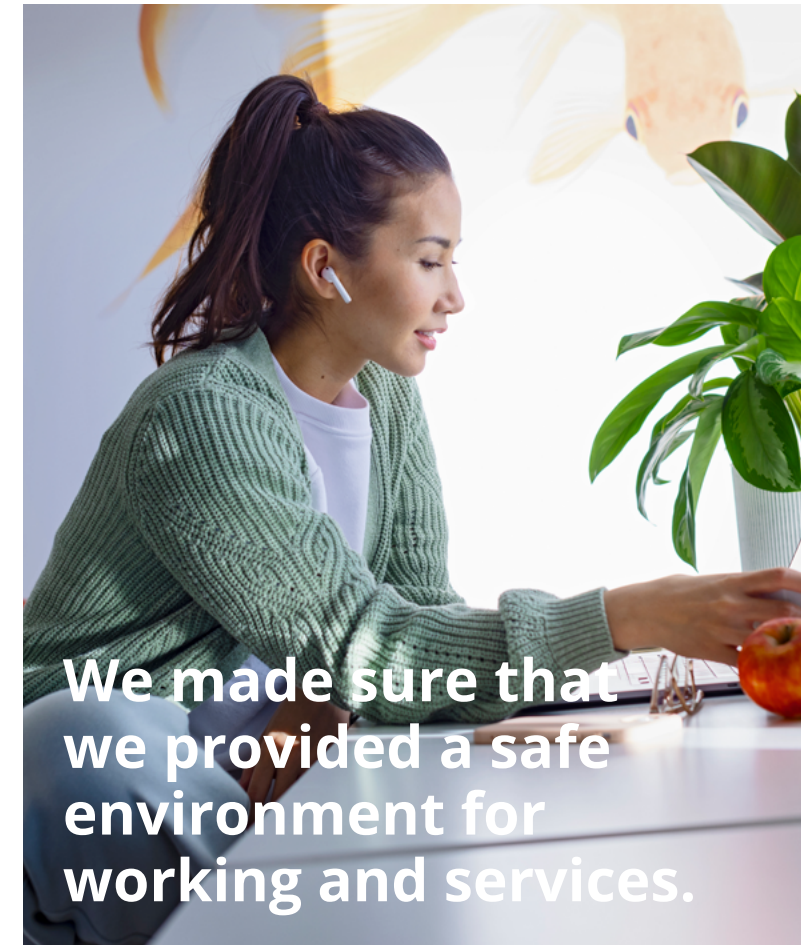
Elisa's stakeholder analysis



Compliance development measures

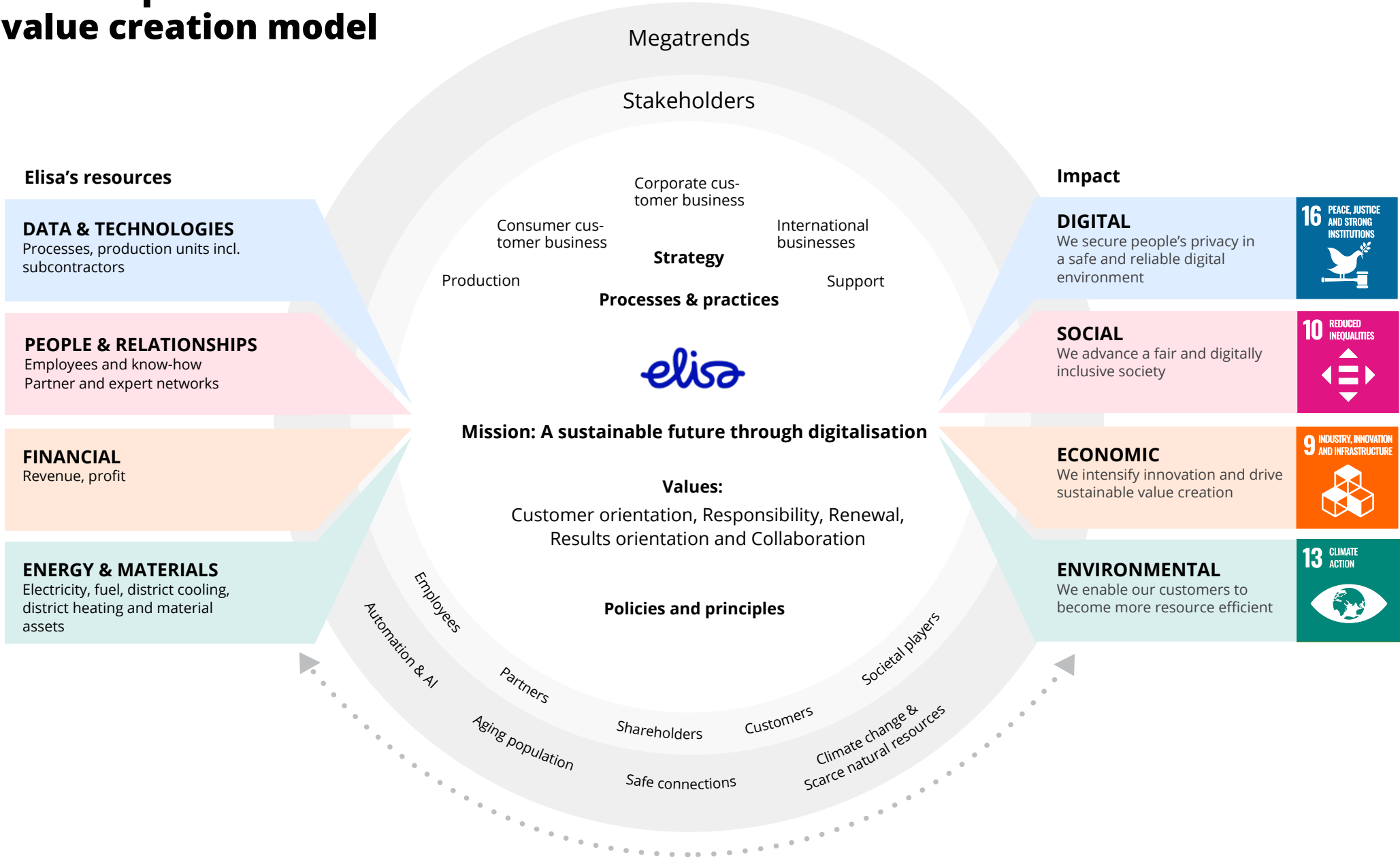
The purpose of Elisa's Compliance Programme is to ensure that Elisa's operations comply with the law and the Elisa Code of Conduct. The key development measures taken throughout the Elisa Group during the year were:

- eLearning training courses on the updated Elisa Code of Conduct for all employees
- Developing Group-wide compliance management
- Updating the Code of Ethical Purchasing
- Assessing Elisa's human rights due diligence commitment and the resulting development measures
- Updating our Human Rights Policy
- Providing targeted human rights training for Elisa employees in Finland and internationally
- Actively participating in the work of the Joint Audit Co-operation (JAC) Human Rights Working Group and involvement in JAC's human rights declaration
- Implementing a supply chain human rights risk survey
- Implementing an anti-bribery and corruption programme: anti-bribery and corruption training (eLearning for all employees in Finland and Estonia, target group-specific training courses), development and piloting of a bribery risk survey tool
- Updating the competition law guidelines and related training (target group-specific training courses)
- Contractual training (target group-specific training courses)
- Revising the Group-wide export control and sanctions policy



**We made sure that
we provided a safe
environment for
working and services.**

Elisa's updated sustainable value creation model



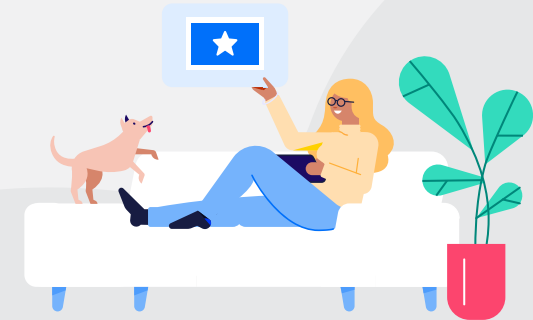
KPI's and performance in 2021

Sustainable value to society

Corporate responsibility

Target year:
2021

Performance:
88%



Digital

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

Reducing the number of network disturbances

Target year: **2021**

Performance: **97%**

Cyber security

Target year: **2021**

Performance: **73%**

All elisians have completed data protection training

Target year: **2021**

Performance: **75%**



Social

We advance a fair and digitally inclusive society

Customer satisfaction in relation to NPS target

Target year: **2021**

Performance: **81%**

Employee engagement score

Target year: **2021**

Performance: **95%**

All elisians have completed the Code of Conduct training

Target year: **Continuous**

Performance: **93%**

Supply chain sustainability development

Target year: **Continuous**

Performance: **100% of procurement and corporate responsibility teams completed Elisa CoEP -training**



Economic

We intensify innovation and drive sustainable value creation

Elisa's medium-term financial targets

elisa.com/investors



Environmental

We enable our customers to become more resource efficient

CO2 emission savings

Target year: **2021**

Performance: **95%**

Science Based Target (SBTi) (T1)

Target year: **2025**

Performance: **100%**

16 PEACE, JUSTICE
AND STRONG
INSTITUTIONS



DIGITAL SUSTAINABILITY

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

Digitalisation connects us wherever we are. Everybody must have the opportunity to use digital services securely.

Elisa plays an important role in making this possible, and the foundations of our business are the trust of our customers, well-functioning services and information security.

Our society and businesses depend on well-functioning and secure communications, connections and services. Elisa plays a key role in enabling its customers' participation in the digital society in Finland and Estonia.

We deliver reliable communication networks and provide our customers with secure services using high-speed connections.

We develop services that strengthen business continuity and cyber security for our public sector and corporate customers. We also offer services based on this expertise to other operators internationally.

Securing serviceability in society

Our new online services also provide significant support for critical communication between the public authorities and other parties. Elisa was selected in 2020 as the sole provider for the Virve 2.0 public safety network in Finland due to the quality and coverage of Elisa's network. Virve 2.0 will be available from 2022, and will cover 4G, 5G and IoT.

TARGETS AND PERFORMANCE 2021

Reducing the number of network disturbances

97%

Cyber security

73%

All elisians have completed data protection training

75%



Transparency and communication



Cooperation and trust



Resilience



Continuous improvement

We are a key player in securing the supply and serviceability of Finland's national telecommunications and ICT services. For example, many social and business activities – such as working and studying from home – would have been impossible during the COVID-19 pandemic without high-quality, secure telecommunications connections. In Finland, Elisa took part in and was involved in planning crisis and continuity exercises (UUSIMAA21 and TIETO2020) together with the authorities and other businesses, both during planning and as a participant.

We are also a key player in Estonia, our second-largest market area. During the year, we participated in crisis management exercises with the authorities to ensure the functionality of the mobile network. We took part in exercises with the Estonian government to prepare for cyber threats.

We also updated our data protection policy and internal security guidelines during the year.

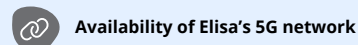
Fast network free of disruptions for everybody

A fast communications network free of disruptions is the cornerstone of a digitalised society.

Our aim is to continuously reduce the number of incidents through proactive and other measures. In 2021, there were 68,414 incidents, and we were able to reduce the number of incidents by 97% through proactive measures.

Our 5G mobile network continued to expand during the year – now it already covers 70% of people in Finland and 150 municipalities. The results of an independent benchmarking study conducted in September show that Elisa's 5G network has by far the best coverage in Finland.

Elisa has also invested in strengthening the mobile network in less populated areas. We anticipated the risk



Availability of Elisa's 5G network

of power failures caused by weather events and other natural phenomena, and we ensured that the mobile network will keep running smoothly during repairs through operational drills, for example. In Estonia, a drill was carried out through a live virtual communication platform specifically developed for this purpose, which allowed the participants and institutions participating in the drill to exchange information in real time.

Elisa's Cyber Security & Service Operations Center (cSOC) monitors the functionality of our services, manages incident resolution, and handles internal and external communication about incidents. We ensure that all of our connections and services remain functional through active 24/7 monitoring, predicting and eliminating faults, and network modifications.

As a result of our persistent development of quality and automation, the number of incidents in Elisa's network has decreased significantly, even though service usage has increased. In Finland, Elisa's network did not have any serious incidents (severity rating A) in 2021 (source: Finnish Transport and Communications Agency).

We ensure the security and quality of our network and the mobile technology we use by operating our network ourselves, using automation solutions that we have developed. We also work closely with experts and operators in the field.

Elisa complies with all regulations from the Finnish Radiation and Nuclear Safety Authority (STUK) and other authorities. All our new access points undergo a safety assessment to ensure that they are placed in a way that is safe for people and the environment. Decisions made by the Finnish and Estonian authorities on the use of technology are based on the results of international academic research.



Security of Elisa's network



Elisa network incident management development





Digital security

We ensure that the digital environment functions well and remains secure by, for example, using the latest technology and continuously improving the security of our networks, hardware and services.

We maintain our employees' first-class expertise through training and other means. We also cooperate with the authorities on an ongoing basis in matters such as serviceability.

We have separate security agreements with our key partners that cover data protection and key security issues. We audit our partners and monitor the implementation of improvements and corrective actions based on the findings of those audits.

Cyber security

Cyber security is a key part of our operations and the quality of our services. Improving cyber security is one of our ongoing goals, and our performance reached 73% of the target level in 2021. Elisa manages cyber security throughout its organisation with a separate steering group. Our key principles include developing our cybersecurity culture, transparency, clear communication, strong stakeholder cooperation, layered cyber-protection, and continuous development of our operations.

We have partly automated functions such as compliance management (including supplier audits). We promote cooperation and continuous improvement with internal cybersecurity drills and through cooperation with our customers and the authorities.



Elisan digital sustainability

We approach cyber security from three angles:

1. We have effective processes in place to prepare for cyber threats and minimise their negative impact on our business. Continuous development of our cSOC expertise is at the core of our operations.
2. We provide our corporate customers with continuous cybersecurity services from the Elisa Cyber Security Center, which is a service independent of operators and hardware manufacturers that monitors the IT environments of several major Finnish organisations 24/7. The service enables comprehensive cyber-monitoring of a variety of business environments. Elisa's cybersecurity services complement Elisa's network and information security services, which means that we can provide organisations with preventive and proactive security services, cyber-incident detection and repair services.
3. We develop and share our expertise and collaborate in cybersecurity communities and with the public authorities, while developing a secure digital society.



Actions and preparing for cyber threats

Increasingly often, various types of cyber threats affect our customers, public organisations, companies and our employees. We manage information security incidents through Elisa's Cyber Security Operations and continuous training. This allows us to effectively prepare for information security threats.

The number of different types of online and telephone scams is constantly growing. For example, the FluBot malware spread widely in Finland at the end of the year 2021. Elisa takes active measures to prevent cyberattacks and to ensure customer trust and the security of internet and telephone services.

Elisa was the first operator in Finland to introduce anti-scam measures to combat scam calls from abroad.

We have particularly invested in developing how we manage information security vulnerabilities and internal instructions.

We have been able to significantly reduce the number of high-severity vulnerabilities and further expand our vulnerability hunting ("bug bounty") programme. During the year, we had 2,472 registered hackers who detected 115 vulnerabilities, and we paid 7,000 US dollars in bounties.

We also supported talented young hackers, who found and reported vulnerabilities in the Finnish matriculation examination system through the Generation Z Challenge hacking and information security campaign on the Elisa platform.

Increasing awareness

Resilient cyber security is particularly important in cloud environments, and our key measures are to improve our detection and response capabilities and our risk-based protection measures. We have systematically increased the amount of cybersecurity preparedness training that we do and have conducted drills covering scenarios such as ransomware and denial-of-service attacks.

We continued the cyberattack simulation training that we started in 2020 (known as "purple teaming") and have achieved significant improvements in our

protection, detection and response capabilities.

In 2021, we updated our cybersecurity training to better reflect how we work today and focused our training on specific roles.

We continued to raise awareness among Elisa employees by using the gamified HoxHunt phishing training platform. Due to our continuous training methods, Elisa employees are good at identifying and reporting phishing messages, outperforming a global control group in identifying malicious messages.

We also increased Elisa employees' and our partners' cyber awareness with our monthly Cyber Weather Newsletter, and by publishing a quarterly snapshot of Elisa's security events with the aid of stories and statistics. In addition, we offered tips on how to detect phishing.

Privacy protection

Privacy protection is a fundamental human right. In line with our human rights policy, we also use a high level of data protection in all our operations to protect the right to privacy in the digital environment as well.

Our goal is for all Elisa employees to complete annual data protection training; in 2021 we reached 75% of our target.

We consider data protection principles whenever we are processing personal data during our

operations. Our privacy policy principles describe our practices regarding processing personal data, such as the reasons for processing the data and the means we use, which we consider when developing new services, for example. We also ensure in various ways that our partners also meet our data protection requirements, including through agreements, audits and other mutually agreed ways. In addition, we provide our staff with regular data protection training. We also have Data Protection Ambassadors working in different parts of Elisa who can use their expertise to help ensure that privacy protection is implemented in the various functions.

Our customers can easily check what information about them we process. Elisa received more than 16,000 personal data inquiries in 2021.

In 2021, regulatory guidance and case law on data protection continued to change, both nationally and internationally. We also continued internationalising our own operations, working hard to ensure that any transfer of personal data is compliant and secure, both for our customers and in our own international operations.

We are offering our corporate and consumer customers a new data protection service (Elisa Identiteettisuoja) to protect their electronic identity. This also allows us to offer our employees and partners more user-friendly and secure ways to work virtually.

Fair and responsible use of information

Data is at the heart of Elisa's business. It is important for a company to understand its knowledge resources and know how to use them. At Elisa, we promote data democracy, which means that Elisa employees understand what kind of data we have, where to find it and how to manage it responsibly. Increasing the visibility of digital information and utilising standardised, role-based workflows are essential parts of responsible data management.

Having high-quality data is one of the key enablers of our mission. A salesforce system implemented in Elisa's Corporate Customers unit has enabled better customer relationship and sales management. Among other things, the integrity, confidentiality and availability of data assist in speeding up troubleshooting during change and incident management processes. We also launched a training course for Elisa employees on data quality management.

To support data democracy and raise awareness among Elisa employees, we also published a data and analytics newsletter covering our new data strategy, among other matters. We updated ethical principles for artificial intelligence to cover as well data ethics.

Elisa's responsible handling of data received an honourable mention in an annual Finnish sustainability reporting assessment, which grants awards to the best sustainability reports in Finland.



Elisa's Ethical Data and AI Principles support data democracy and responsible data management



Read more about digital security at Elisa

Ethical use of artificial intelligence

Analytics, artificial intelligence, machine learning and robotics are important tools for making the most of data. We continued to develop our AI, machine learning and robotics processes and solutions. Robotic process automation is a key tool for enabling digitalisation at Elisa. With the aid of automation, we reached 7.5 million robotics transactions during the course of the year.

Together with Aalto University, we have developed Elisa Puhebotti for natural speech recognition in the Finnish language. Elisa Puhebotti utilises AI and the best Finnish-language recognition algorithm in the world to recognise natural language, which allows both speech and text to be understood. Elisa Puhebotti makes around 70% fewer errors than the next-best solution.

Technology aiding in healthcare

Retirements and the workloads of nursing staff are increasing the need for digitalisation in joint municipal authorities across Finland. Taking advantage of data improves the quality of home care services, which allows older people to remain in their own homes for longer.

Using sensors and data to monitor health facilitates more accurate forecasts. It also allows shorter reaction times and more independent living for home care clients. Healthcare professionals can save time utilising the digital tools.

Elisa's digital services for home care help ease staff shortages and reduce the carbon footprint.

Elisa Digihoiva enables several different functions (such as video calls, home sensors, wrist alarms, medicine reminders, remote metering and electric locks) to be used through a single interface.

The service allows motion data to be used in monitoring the health and activities of older people living in their own homes, and appointments can be scheduled according to the client's circadian rhythm. This frees up home care employees to see the most urgent clients in the morning and provides up-to-date situational awareness for both healthcare professionals and the relatives of older people. The service also helps involve the relatives in the healthcare service. By using Elisa Digihoiva and 25 tablet computers for remote visits, the town of Kaarina in southern Finland was able to reduce the amount of driving due to home care visits by 800 km per week.

Healthcare staff have given positive feedback about utilising digital services, and the services have been especially well received by the customers and their relatives: for example, the service has made it possible for relatives to have lunch with the (home care) customers.

Elisa's Digihoiva user club shares good practices with customers and aims to avoid stumbling blocks.



“The Elisa Digihoiva service has been found to be well suited for monitoring the wellbeing and safety of customers living at home.”

Digi-HTA assessment report in cooperation with Suvanto Care

10 REDUCED INEQUALITIES



TARGETS AND PERFORMANCE IN 2021

Customer satisfaction in relation to NPS target

81%

Employee engagement score

95%

All elisians have completed Code of Conduct training

93%

Supply chain sustainability development

100% of procurement and corporate responsibility teams completed Elisa Code of Ethical purchase training.

SOCIAL SUSTAINABILITY

We advance a fair and digitally inclusive society

We respect human rights and follow our general operating principles when working with our partners to create a sustainable future.

Non-discrimination, equality, good management, wellbeing, and occupational health and safety are important themes for Elisa. We work every day to build a safe digital environment to ensure equal rights for all.

We are an important employer in our main market areas, Finland and Estonia. We directly and indirectly employ thousands of professionals all around the world as the result of internationalisation. We measure our success as an employer with employee satisfaction surveys. Our long term ambitious goal is to be among the top 5% of employers internationally. In 2021, our Engagement Score was 76 and we did not reach the target for 2021. We are systematically developing our operations based on feedback from the survey as our working environment changes.



When life calls, work is flexible

It is important for us that in the ever-changing working environment, all our employees feel that they are safe, heard, and treated fairly and respectfully. This requires good management and the development of training skills, as well as investments in working methods and the corporate culture. We have long been a trailblazer in flexible working, and it is a natural part of our working culture. Flexible ways of working that allow us to combine work and leisure more ecologically are normal for us.

Internationalisation and the ever-changing work and operating environments require continuous development of operations, and both the employer and employees must bear their responsibility for wellbeing at work. Trust, open interaction and jointly agreed, clear working principles and goals are at the core of operations that support wellbeing and flexibility of the organisation.

Promoting equality in working life is all about action

We annually assess how well we are achieving our non-discrimination and equality targets as part of our employee satisfaction survey. In 2021, the score was 90, which was 2 scores higher than the target Top 5% Global benchmark.

Over the course of the year, we took the steps described below to promote an equal working culture. We introduced gender-neutral job titles. To promote careers opportunities for women, we set a target of increasing the proportion of women in supervisory positions in Finland. We developed our recruitment practices to make them more equitable. People of different genders must be interviewed for each supervisory position. We also introduced a tool to help us make the language of our job advertisements and application forms more gender neutral.

We became a member of the Inklusiiv Community to help build a more equal society and working life, and to learn and further develop our operations. We decided to join in and support Women4Cyber Finland in 2022. This non-profit foundation aims to promote, encourage and support the participation of women in cyber security. With other teleoperators, we participated in Pride, Finland's largest annual human rights and culture event, to celebrate human rights and all the colours of the rainbow.

The Equality Working Group convened four times in 2021.

A photograph of a woman with curly blonde hair tied up, smiling and looking at a smartphone. The image is partially covered by a large white text overlay.

Our flexible working model allows people to balance work and free time, as well as to work in a more environmentally friendly way.



We systematically collect customer feedback and develop our services in cooperation with our customers.

Digital inclusivity and equality at the customer interface

Through our services, we encounter millions of corporate and consumer customers every year, either physically or virtually. One of our key objectives is to make every one of these encounters a genuine and effortless one, conducted safely and securely, respecting the customer's privacy. This is also how we promote equality and ensure non-discrimination.

We measure the success of our customer encounters with using NPS surveys. It is important for us to ensure that every customer encounter is easy and safe for the customer. Our result compared to our target was 81%. In addition to NPS, we regularly collect feedback on our performance through a variety of other customer satisfaction surveys to improve our operations. In Finland, we use regional councils, through which we receive valuable feedback from stakeholders in each region to improve our operations.



Diversity at Elisa (FI)

Security and ease of use

Successful customer interaction and secure services that are easy to use are key issues when developing the Elisa customer experience. In 2021, we continued our work to promote the ease and accessibility of services. Other key development areas for the year included improving the performance and reliability of Elisa's network, privacy-enhancing services and improved customer service practices. In the corporate customer sales model, we introduced a feedback model that further improves the possibility to offer feedback.

In Finland, we have targeted measures to improve the accessibility and availability of our services. We developed our operational model e.g. by providing free-of-charge Digi-support and by investing in the Omaguru service. With the Finnish Centre for Easy Language, we organised training on simplified language for all of our employees. We promoted accessibility of our digital services through targeted trainings for our service development experts and accessibility assessments in more than ten Elisa services. We made an accessibility statement e.g. for the Elisa Ring mobile applications.

We continued piloting accessibility. In 2020 we published Sustainability Report as an audiobook and 2021 report is also available as an easy-to-read version in Elisa Kirja service.



Read more about accessibility at Elisa

Responsible supply chain

Our goal is to continuously improve our operations with the parties active in our supply chain to ensure that our supply chain is ethically and environmentally sustainable.

In 2021, we paid EUR 936 million in fees to our suppliers and subcontractors.

Our responsible sourcing working group coordinates the promotion of sustainability and sustainable development measures. These development measures focus, in particular, on the supply chain for equipment and products. The working group met four times during the year.

We performed a total of 71 sustainability audits, which did not lead to any partners being rejected. During the audits, we identified a variety of deficiencies to be corrected, involving topics such as occupational health and safety, the environment and working hours. For these, development measures will be monitored in line with the JAC model.

During the year, we renewed our ethical sourcing practices and principles. All of Elisa's sourcing employees and responsibility team members completed a new online training course on ethical sourcing principles. We initiated a targeted survey about forced labour and discrimination in our supply chain. We partnered with Lenovo to reduce emissions from terminal equipment purchased for Elisa employees, and we started to use Lenovo's CO2 offset workstations. We updated our internal instructions on the chemical safety of products in line with the REACH requirements and organised training as well as communicated about instructions for business managers in Finland.

We reformed our company car policy and our car fleet, and we made emissions limits for leased cars stricter. Fully electric cars are used in all 5G service installations for Elisa's customers.



Read more about the responsible management of sourcing and Elisa's ethical sourcing principles





Sustainability is all about action. Elisa and its employees have been Red Nose Day partners for ten years for the benefit of children.

Sponsorship and charity

Participating in social dialogue is important for Elisa. We are engaged in persistent work towards the wellbeing of young people, in particular.

For four years, our ShedHelsinki Foundation has supported varied work to support children and young people, especially those with special needs. ShedHelsinki works with communities and partners that support children and young people in the creative performing arts, producing music theatre, events and activities such as musicals.

ShedHelsinki's musical in 2021 was A Christmas Carol. We also arranged the first ever ShedHelsinki Writing Club, where "old" ShedHelsinki members had the opportunity to write monologues in a writing workshop. You can view the recorded stories [here](#).

More than 2,000 children have already studied the wonders of the digital world and learned the basics of programming in Elisa's digital schools. Due to the restrictions in 2021, we were unable to arrange any physical classes, but we developed the concept further.

In December, we arranged the first ever online safety school for children in Rovaniemi, hosted by popular social media influencer Inari Fernández. The online safety school takes a closer look at the growing importance of online safety in children's everyday lives. We continued our collaboration with the Queen Silvia Nursing Award. The partnership involves a scholarship awarded to a student nurse or practical nurse who has come up with a good idea to improve nursing, especially care for patients with memory problems.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



TARGETS AND PERFORMANCE IN 2021

Elisa's medium-term financial targets

elisa.com/investors

Financial effects 2021 (2020), EUR million

Revenue 1,998 (1,895)				
Payments to suppliers and partners	Salaries paid	Dividends paid	Corporate taxes paid	Capital expenditure investments
936 (888)	374 (326)	325 (310)	77 (70)	265 (266)

ECONOMIC SUSTAINABILITY

We intensify innovation and drive sustainable value creation

By operating responsibly and profitably, we create value for Finnish and Estonian society. Promoting sustainability requires continuous innovation.

Our long-term strategy also aims to enable sustainable business for our stakeholders in the future.

Elisa's strong financial performance continued in 2021, and our competitiveness creates sustainable value for our stakeholders and society as a whole.

A significant part of Elisa's revenue is channelled back to society. Investments, jobs, taxes paid, dividends paid to our owners and payments to our partners all contribute to economic prosperity.

Elisa has plenty of experience of developing successful and sustainable services and digital society in cooperation with start-ups and universities.



Information in accordance with the EU Taxonomy Regulation

Elisa's business and digitalisation solutions significantly contribute to sustainability and environmentally friendly operations for customers and society. Elisa is a trailblazer in environmental work within the telecommunications industry: a carbon-neutral company with business operations promoting achievement of the UN Sustainable Development Goals. **Elisa's Sustainability Finance Framework** supports our sustainability goals and investments.

The European Union's sustainable finance package includes a new regulation on sustainability-related disclosures in the financial services sector (EU 2019/2088), which requires financial market participants to assess and provide information on the sustainability of their investment products. The Taxonomy Regulation (EU 2020/852) aims to define harmonised and scientifically based assessment criteria for environmentally sustainable economic activities.

The classification system will be further developed in the future and as of now, the telecommunications operator sector has not yet been included in the EU Taxonomy. At this stage, the share of economic activities covered by the classification scheme in Elisa's revenue,

capital expenditure investments and operating expenses is, therefore, limited.

In accordance with the Taxonomy Regulation, we have identified and defined, and we report, the indicators for Elisa's economic activities covered by the current classification. Through a comprehensive company-wide assessment of all Elisa business activities and NACE codes, the following activities have been identified as eligible: data centre services, entertainment services, IoT solutions for industry and network performance, as well as remote conferencing services. The related criteria are specified in the following functions of the rating system 8. Information and communication, in subsections 8.1. Data processing, hosting and related activities, 8.2. Data-driven solutions for GHG emissions reductions, and 8.3. Programming and broadcasting activities.

The definition of the indicators has been carried out in accordance with the guidelines for definitions and calculations included in Annexes 1 and 2 to Delegated Regulations (EU) 2021/4987 and 2021/2800. Revenue, capital expenditure investments and operating expenses are based on Elisa's financial statements for 2021. Double counting has been avoided by classifying external revenue streams into taxonomy activities only once. The calculations and results have been assured by a third party.

Elisa's EU taxonomy eligible economic activities and KPIs

Economic activities	Absolute turnover (EUR million)	Proportion of turnover (%)
Taxonomy eligible activities	284.2	14.2
Taxonomy non -eligible activities	1,713.7	85.8
Total	1,997.9	100.0
	Absolute CAPEX (EUR million)	Proportion of CAPEX (%)
Taxonomy eligible economic activities	23.2	8.6
Taxonomy non – eligible economic activities	246.5	91.4
Total	269.7	100.0
	Absolute OPEX (EUR million)	Proportion of OPEX (%)
Taxonomy eligible activities	8.3	7.3
Taxonomy non-eligible activities	105.3	92.7
Total	113.6	100.0



We have begun preparations for next year's reporting and are familiar with the compliance requirements of the current EU Taxonomy Regulation. We will monitor any changes to the regulation and any new guidance from the EU that may have an impact on the reported indicators. Our estimate is that the shares of aligned turnover, fixed assets and operating expenses in the EU rating system will be lower.

Investments to promote digitalisation

We are the largest operator investor in Finland. Every year, we invest some 12% of our revenue in networks and services in our main market areas, Finland and Estonia. With these continuous investments, we are building and maintaining comprehensive fixed and mobile networks, and we can introduce the latest technologies to meet the needs of our digitalising society.

In 2021, our capital expenditure investments totalled EUR 265 million, targeted at the development of networks, IT systems and customer terminal devices. We also invest in digital services in Finland and abroad.

Sustainability-based financing boosts sustainable growth

The focus on sustainability is also reflected in Elisa's financing. In 2021, Elisa signed its first EUR 130 million **loan facility** linked to sustainability targets. At the beginning of 2022, we launched our Sustainability Finance Framework, which covers Elisa's climate goals, as well as digital and social sustainability.

Funding linked to sustainability objectives will help us accelerate sustainable growth and is linked to performance in the key sustainability objectives.

Elisa's Sustainability Finance Framework and its independent assessment are available on the **investor website**.

Patented innovations

For the second year in a row, Elisa was one of the top patent applicants in Finland. Patentable inventions are typically created in connection with the development of Elisa's products and services.

Elisa's strategy is to commoditise software products based on innovations created in the development of its own operations for sale on the international market, including to other operators.

Patents and other intellectual property rights that protect innovations are even more important in new business functions. They support the transformation of innovation into business.

Elisa has 265 patents and pending patents, largely related to the development, maintenance and monitoring of networks and services, as well as automated verification of availability and troubleshooting.

The protection of technologies such as AI, machine learning and reducing the carbon footprint was strengthened.

In 2021, we filed 40 new patent applications.

Value for society in the form of tax revenue

Elisa is committed to responsible and efficient operations. By paying taxes and other public levies, we participate in the development of society in all our operating countries.

Elisa's tax principles are based on legislation, and we pay taxes in accordance with local tax laws and regulations. We pay direct and indirect taxes in compliance with all laws and regulations in all our operating countries. Elisa aims for results taxation performed in one country only.

In addition to corporation tax, Elisa's tax footprint consists of value added tax, withholding tax, tax paid at source, statutory social security contributions and other taxes, as well as other tax-like payments. The tax data of the Elisa Group companies can be found in the ESG data of this sustainability report.

One of the largest corporate taxpayers in Finland

Elisa's main market areas are Finland and Estonia. In Finland, Elisa is the third largest corporate taxpayer, and we pay 77% of all the corporation tax paid by telecom operators (confirmed tax data for 2020). The taxes paid and accounted for by us in 2021 totalled EUR 531 million. Elisa's performance has a nationwide impact. Almost half the corporation tax goes to 37 different municipalities, and we are a significant payer of corporation tax in many locations.

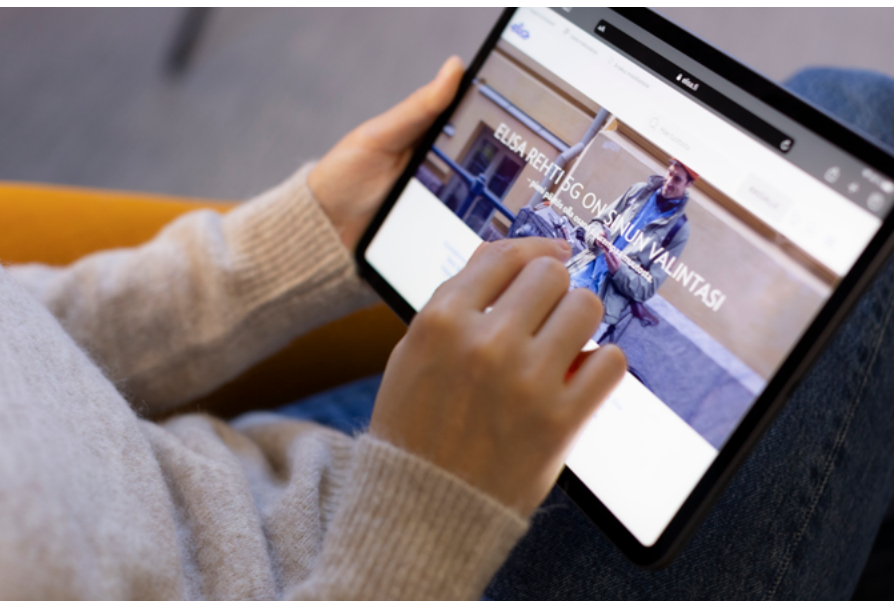
In Estonia, which is part of our main market area, companies only pay corporation tax if they pay dividends to their owners. Elisa's subsidiaries in Estonia have not paid any dividends to the parent company.

Elisa is expanding internationally and now operates in 21 countries, where it pays taxes in line with local legislation.

Compliance with tax obligations

Elisa's tax principles are supported by internal guidelines and controls. Elisa's tax affairs are handled by the company's finance unit. Elisa's risk management process also includes a tax assessment. Elisa cooperates transparently with the tax authorities and other key stakeholders. Elisa uses an anonymous whistleblowing channel through which stakeholders can report activities that violate Elisa's Code of Conduct.

Elisa's tax data by country of operation, ESG data, p.69



“Through start-up cooperation, we were able to improve the remote-control system for Kalmar cranes, for example. We combined 3D video technology from the Korean company Mopic Labs with Elisa’s 5G network to remotely control cranes using live 3D video without any VR glasses.”

Laura Puusaari, Head of Startups, Elisa

An important producer of cultural content

Elisa is one of Finland’s most important producers of domestic TV series and drama films. We have launched more than 25 original series that have been sold to over 50 countries and have received international awards. In 2021, our calculated cultural footprint amounted to EUR 40 million (including direct content purchases, mainly from Finnish parties, and payments to producers, authors and copyright organisations). Elisa offers the Elisa Viihde Viaplay streaming service in cooperation with Nordic Entertainment Group.

Elisa is also a major eSports producer and organiser of international tournaments. Gaming brings young people together around a shared interest. We monitor and encourage equal and respectful behaviour in our services.

Cooperation with start-ups

Elisa has an international network of more than 2,000 startups that are highly satisfied with their cooperation with us (with NPS of 67). We have co-developed a total of more than 40 innovations with these startups.

In 2021, we realised nine innovations to enable a sustainable future. We develop all new solutions with our customers, ensuring that they will have value and sustainable relevance in the daily lives of consumers and organisations.

In 2021, most of the innovations developed with startups utilised Elisa’s extensive 5G network. For our corporate customers, we worked with the Finnish start-up Vertical Hobby to develop an automated drone flight service for parcel deliveries and a remote-controlled 5G drone for indoor use to improve the safety of emergency services and the inspection of building exteriors.

In the consumer business, we launched a popular mobile app in Finland enabling social media content from Swedish start-up Frever. With 5G, the app offers consumers a new way to produce animated videos on their phones and share them on their social media channels.

This year, we also realised three sustainable future startup accelerators with five of our customers. Fazer, Helen, Helsinki University Hospital, Kalmar and the Finnish Broadcasting Company (Yle) worked with us to design and develop solutions for the future. In our accelerator programmes, we have combined Elisa’s 5G services with the needs of our partner companies to create innovations with startups.



Get to know Elisa’s startup activities

Research cooperation

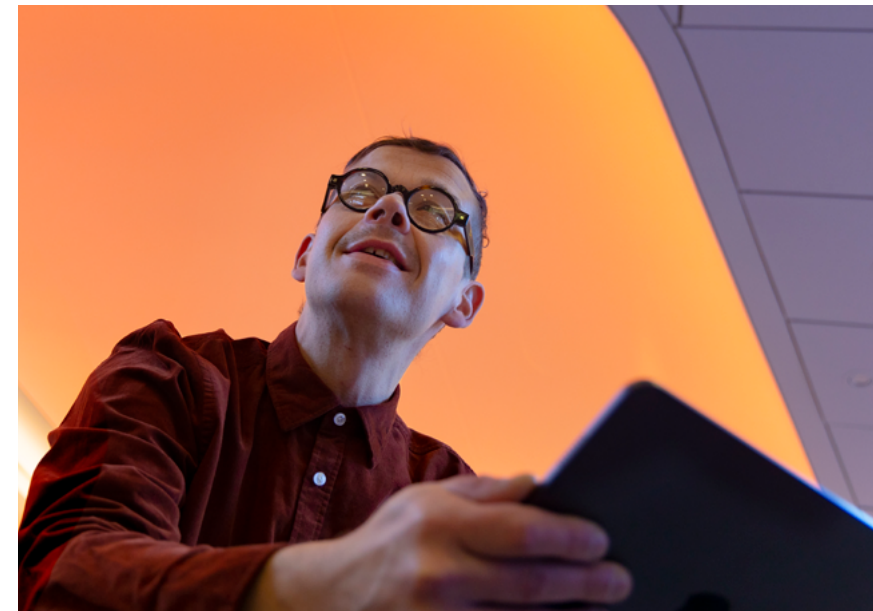
In 2021, we started working with new academic partners and continued our existing collaboration with the Finnish Center for Artificial Intelligence (FCAI). The goal of the research cooperation is to learn about the latest technology and business model trends, and to enable cutting-edge technologies that can be used to build the latest products and services for our customers.

In 2021, we launched new collaborative projects with the University of Helsinki and the University of Southern California in key areas such as AI, big data and cybersecurity.

We also used high-quality research to improve the quality of our cutting-edge automatic speech recognition solutions, which are widely appreciated by our corporate customers. In addition, the results of the research cooperation with the FCAI will be used to automate the prediction of alarms in cable TV networks and computer workstations, enabling AI-based predictive maintenance for our equipment and networks.

As the next step, we aim to significantly improve the quality of our customer experience solutions with an AI-based chatbot that is being researched and developed in collaboration with the FCAI.

In addition, every year, we support through the **HPY Research Foundation** scientific research, teaching and development work in telecommunications technology, telecommunications and data communications. By 2021, the Foundation had granted more than EUR 1.1 million in scholarships, mainly to postgraduate researchers at various universities. The library of the HPY Research Foundation consists of 132 dissertations and theses.



Innovation is an essential part of Elisa's business, which we use to create sustainable services for digital society, both in Finland and internationally.

13 CLIMATE ACTION



TARGETS AND PERFORMANCE IN 2021

CO₂-emission savings

95%

Science Based Target (SBTi) (T1)

100%

ENVIRONMENTAL SUSTAINABILITY

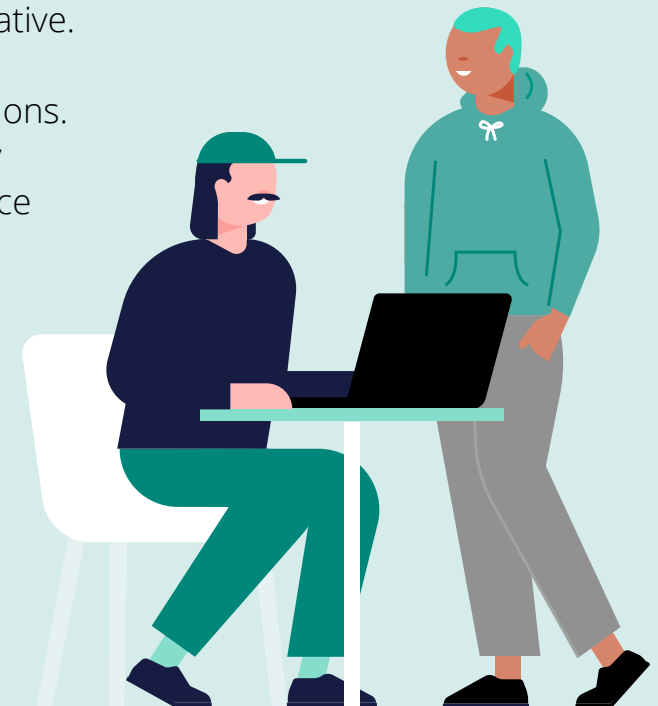
We enable our customers to become more resource efficient

Our environmental sustainability work focuses on the climate and is aligned with the target of 1.5 degrees agreed at the UN Paris Climate Change Conference, in line with the requirements of the Science Based Targets initiative.

Elisa is already carbon neutral in its own operations. We pay attention to the emissions in our supply chain, and we want to help our customers reduce their own carbon footprint.

Climate change and resource scarcity are causing a variety of crises worldwide, leading to inequalities and loss of biodiversity. Elisa can best make a difference by promoting energy and material efficiency.

Our environmental sustainability is in line with UN Sustainable Development Goal 13, which is to urgently tackle climate change and its impact. We also believe that it is important to ensure responsible consumption and production. Elisa also supports the precautionary principle of the UN Global Compact, various initiatives to promote sustainability, and environmentally friendly technologies.



We enable resource efficiency for our customers

ENERGY EFFICIENCY

We assist our customers in reducing their energy consumption.

We use waste heat from our data centres in the district heating network.

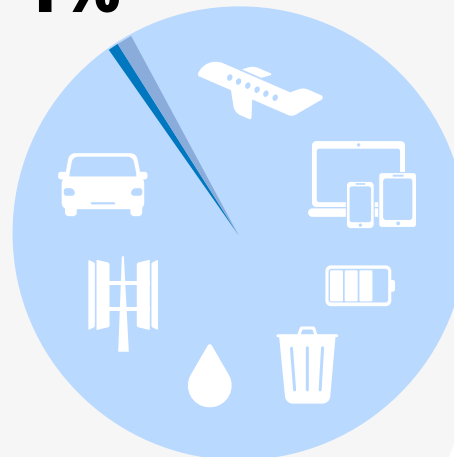
We are continuously improving the energy efficiency of our communications networks.

We use renewable energy: 100% renewable electricity (FI, EE), 100% renewable district cooling (FI).



Scope 1+2 emissions

1%



Scope 3 emissions

99%

● Scope 1 ● Scope 2 ● Scope 3

MATERIAL EFFICIENCY

We securely recycle devices.

We reuse up-to-date network hardware.

We extend the service life of phones by repairing and refurbishing them.

We offer our customers products as a service in line with the circular economy model.



We are engaged in ongoing climate work related to our own activities

Climate change is part of risk management

Through strategic foresight and scenario work, we can increase our understanding of the risks of climate change and better prepare for them at the same time. Climate risk assessment is part of Elisa's three-tier risk management process, which aims to manage the level of risk by accepting, mitigating or avoiding different types of risks. The word "footprint" describes the actual negative impact of a company. The bigger the footprint, the greater the risks.

Elisa prepares an annual CDP report on the risks created by climate change in our operations. The CDP report also complies with the best practices of the Task Force on Climate-Related Financial Disclosures (TCFD), and we publish a separate TCFD report as well.



Elisa's 2021 TCFD report

Our energy efficiency work continues

The district cooling we use in Finland and the electricity we buy in Finland and Estonia come from renewable sources only.

Through our energy choices and continuous efficiency improvements, we have been able to reduce our carbon footprint by 77% since 2016. We are expanding the tools we have identified and are piloting ways to further reduce our energy consumption and its impact.

Elisa participates in the Finnish Voluntary Energy Efficiency Agreements, in which we report the impact of these actions.

Only a highly limited part of Elisa's business is covered by the current EU classification system for sustainable investments, such as data centre services, entertainment services, IoT solutions for industry and network performance, and remote conferencing services. The classification system does not cover Elisa's carbon-neutral network business and the services we provide based on that business, which will play an important role in building a sustainable society. For example, they assist our customers to reduce their own environmental impact by avoiding travel or extending the lifetimes of their hardware. According to the **Enablement Effect report from the GSM Association**, the handprint of our services can be ten times the footprint they create. More detailed indicators and definitions can be found in the financial sustainability section of Elisa's sustainability report.

We have built a carbon-negative data centre

We use the waste heat from our large data centres in the district heating network. Our data centre in Tapiola has been involved in the production of district heating in Espoo for a decade. Our heat recovery solution also reduces carbon emissions.

Between 1 January and 31 December 2021, our data centre in Säteri was carbon negative, meaning it reduced more carbon emissions than it produced, while generating revenue from the sales of energy. The district cooling we use in our data centres is 100% renewable. We are also continuously implementing other energy efficiency measures at our data centres and all of our corresponding technical telecommunications facilities.

Energy efficiency of our mobile network

As early as 2009, Elisa introduced the unlimited data business model, which has contributed to the development of the Finnish information society and more sustainable digital solutions. Finns are among the biggest users of data in the world.

Using 5G enables the transfer of larger volumes of data over mobile networks. Although modern 5G technology is much more energy efficient than previous network generations, the increase in data volumes will increase the consumption of electricity.

Since 2016, we have improved the energy efficiency of our Finnish mobile network by 68%. We will continue to improve our energy efficiency by rolling back 3G technology and further optimising 5G, for example.

We reduce the climate impact of our supply chain by promoting the circular economy

Reusing network equipment

Elisa's network operations have an environmental impact not only due to the consumption of energy, but also due to the manufacture of the required hardware. We engage in dialogue with stakeholders in the supply chain and take the environmental impact into account in our sourcing decisions.

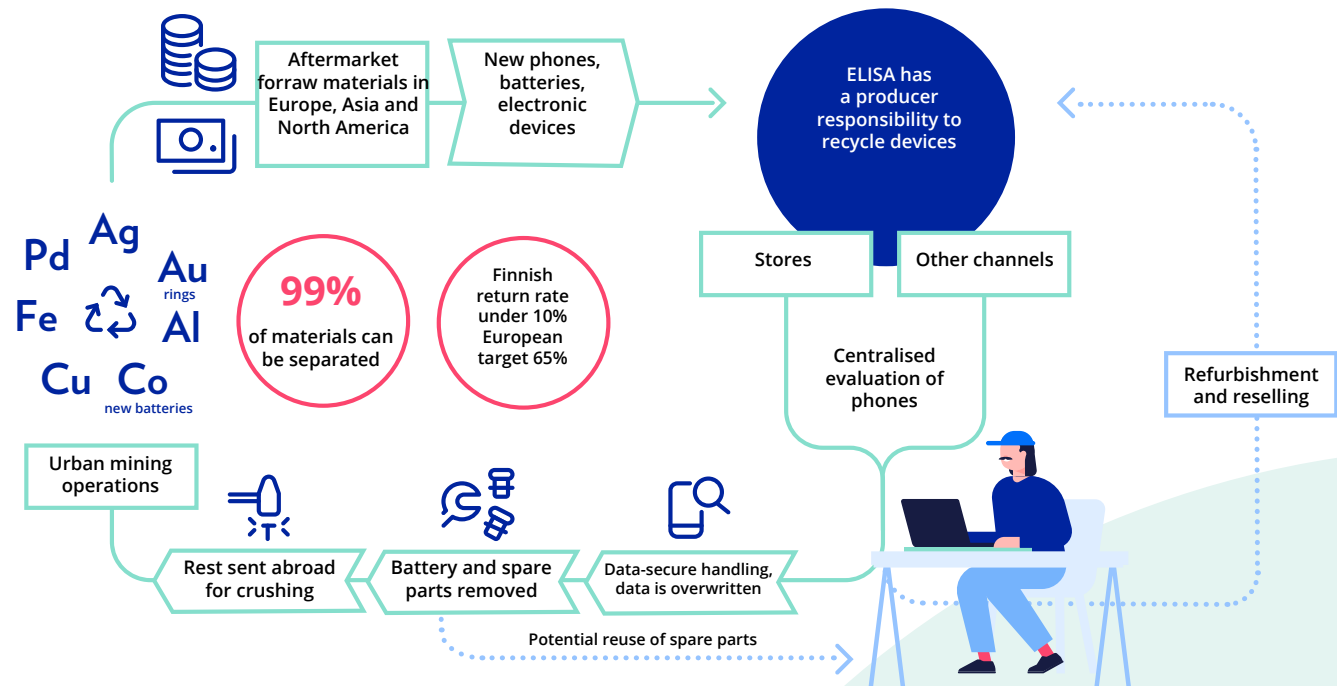
We reduce the volume of waste electrical and electronic equipment (WEEE) through reuse and recycling. In this way, we have been able to reduce costs in our mobile networks while reducing emissions from the manufacture of similar new hardware through reuse.

"Luurit looppiin" recycling initiative

The environmental impact caused by the devices we sell to our customers during the lifecycle of the devices is unavoidable. Manufacturers must increasingly reduce emissions from the manufacture, transport, use and recycling of devices.

Elisa reduces the environmental impact of devices sold to customers by repairing, refurbishing and selling phones for reuse and promoting recycling, for example. In 2021, we launched our "Luurit looppiin" ("Phone Loop") initiative to raise awareness of the benefits of recycling and make it as easy as possible to recycle old phones.

To raise awareness of the circular economy, we worked with the well-known Finnish social media influencer Julia Thurén, for example. The blog posts she has written are also available on [Elisa's circular economy website](#) (in Finnish only).



"My blog and social media collaboration with Elisa has been enormously rewarding. Each Elisa partnership has received a lot of attention through my channels, and I have received hundreds of private messages from followers who are interested in recycling their phones. Consumers seem to be genuinely excited about the Luurit looppiin campaign, and the best thing is that they now associate recycling phones with Elisa. The campaign came at just the right time, because it seems everyone is talking about recycling electronics and sustainability."

Julia Thurén from the blog Juliaihminen

We assist our customers to reduce their own climate impact

We identify risks as opportunities

By accelerating innovation, we can help our customers and other stakeholders to address their own challenges in different areas of sustainability. We call this Elisa's handprint, meaning that it describes the emissions that can be avoided compared to the old way of doing things, for example. Prioritising these opportunities is part of Elisa's strategy process.

Our handprint in energy efficiency

Electricity consumption forms a major part of the environmental footprint of digitalisation. Elisa has extensive expertise in improving energy efficiency, and we can offer our customers sustainable digital services.

The GSM Association has reported that energy consumption typically accounts for 20–40% of the running costs of an operator's network and the radio access network for almost 60% of these costs. Elisa has developed a machine learning solution – Intelligent Energy Saver – which reduces this energy consumption by 14%, and therefore also reduces emissions.



Elisa Polystar solutions

Most companies' carbon emissions often originate in the supply chain

We have been working for more than a decade to minimise our own carbon footprint, and our next step will be to focus increasingly on the carbon emissions from our supply chain. A total of 99% of our carbon emissions are Scope 3 emissions. That is why working with our supply chain is important. Elisa is involved in organisations such as the Joint Audit Cooperation and the GSM Association. In this way, we can work with others to ensure that companies in our supply chain commit to Science Based targets and accelerate their climate action, for example.

Our handprint in material efficiency

Alongside climate change, the sufficiency of resources in a linear economy is a growing challenge for businesses. Circular economy business models offer solutions for increasing material efficiency. Elisa has several solutions that support the circular economy.

As a service provider, we reduce our environmental impact by actions such as offering hardware as a service to businesses, providing repair services, refurbishing and reselling phones, and securely recycling devices at the end of their service life.

We aim to reduce the amount of waste generated by maintaining, repairing, refurbishing, reusing and finally recycling hardware. We also offer these services to our customers, alongside circular economy business models such as products as a service. For example, an Elisa Viihde Premium digital receiver is offered to the customer as part



of our entertainment service.

Elisa employees can use Lenovo's carbon offset computers, and we also offer them to our corporate customers.

Elisa's international businesses offer excellent opportunities to improve material efficiency in production chains, which will increase Elisa's environmental handprint.



Elisa IndustriQ business

Climate work by Elisa employees

Every day, we each make several decisions that have a direct or indirect impact on sustainability. Elisa's mission gives our employees a strong mandate to make responsible choices.

We take environmental sustainability into account in our sourcing agreements and real estate operations, as well as in the food waste from our staff restaurants, for example. Especially in Elisa's Production unit, there are significant opportunities to influence energy efficiency, for example through continuous development of our data centres and mobile network, as well as the procurement of renewable energy. We have raised awareness of sustainable service design (eco design) by launching internal trainings and engaging in stakeholder dialogue.

In 2021, Elisa employees actively participated in webinars on environmental issues and commented on an analysis of a commuting survey published on the intranet, for example.

External recognition for our climate work

We respond to our stakeholders' expectations by transparently reporting on the progress of our environmental sustainability. We engage in dialogue on environmental responsibility reporting with various institutions every year.

The Financial Times listed the 300 European companies that have reduced their climate emissions most between 2014 and 2019. Elisa was the highest-ranked Finnish company, coming ninth in the Europe's Climate Leaders 2021 list.



Climate work with stakeholders

Our customers are increasingly asking for more information on climate impact, which is a great opportunity to engage in a dialogue on the sustainability challenges they face and to understand our carbon handprint potential in different cases.

In cooperation with the City of Helsinki and the WWF, we continued to raise awareness of local biodiversity by developing high-quality live streaming solutions at natural sites, using our 5G network.

Elisa supports WWF
Finland's Wildlife
live streaming service
with digital solutions



"We act as eElisa tutors alongside our own work, and we are particularly interested in sustainable development themes. In 2021, we were closely involved in the development of the Luurit looppiin phone recycling process, brainstorming and experimenting with different ways to recycle phones with our customers."

eElisa tutors Anna-Kaisa Tolvanen, Minna Jokela, Kaisa Niemelä and Youssef Oudrhiri



Our journey continues after carbon neutrality

Reducing carbon emissions has been part of our strategy since 2009, and in 2018, we set climate targets under the Science Based Targets initiative in line with the Paris Agreement. In 2020, Elisa was the first Nordic operator to become carbon neutral in its own operations. We achieved this by implementing energy reduction measures and through certified carbon offsetting.

Our aim is to further reduce the need for offsetting by continuing with our work on resource efficiency. Next, we will continue by focusing on non-core emissions throughout our supply chain. We will also measure how our carbon handprint can assist customers to reduce their own footprints.

In 2021, Elisa committed to the Call on Carbon initiative of the Climate Leadership Coalition (CLC) and the European Climate Pact initiative of the CDP and was a partner in the UN Global Compact Network Finland Climate Ambition Accelerator programme. Our commitment to the net zero carbon emissions target of the Climate Pledge means that emissions from the manufacture of hardware or use of services will have a net zero impact by 2040. We have identified the areas of our economic activities that fall under the scope of the EU classification system, and we report them in the financial sustainability section.



Carbon accounting principles in Elisa's climate work, Elisa's environmental management system and policy

We develop our compensation portfolio

Our offsetting follows a hierarchy of emission reductions, in which the primary means is always to identify and minimise our own emissions. As we realise our offsetting responsibly in this manner, our actions have actual climate benefits.

We have identified the climate impact of our operations and have been systematically realising energy measures based on the climate impact since 2009.

We will continue to offset direct (Scope 1) and indirect (Scope 2) energy emissions from our own operations, as well as emissions from business travel, commuting and waste (Scope 3), as one of the ways to maintain carbon neutrality. We utilise the projects in our portfolio for all our climate offsets.

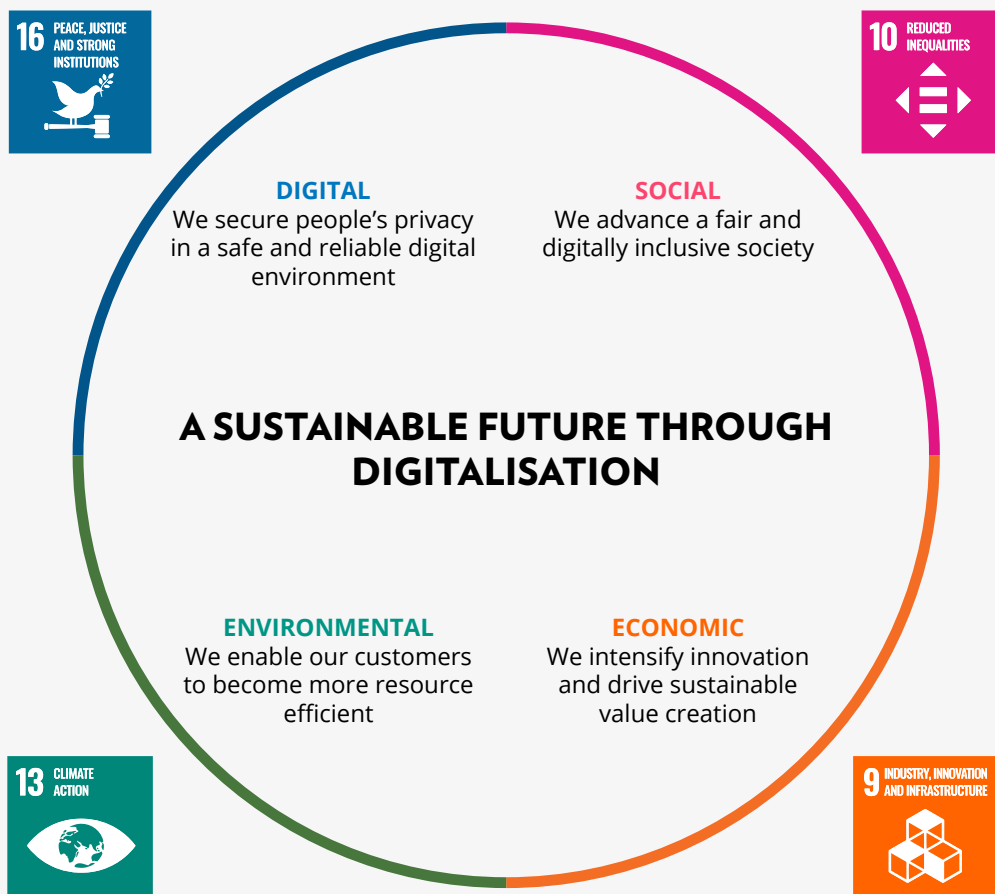
For our offset portfolio, we select high-quality projects that reduce carbon emissions and promote sustainable development. Half the projects are currently Gold Standard-certified, and all have been verified as in line with the sustainable development goals.

Our offset portfolio is also used in the responsible Elisa Rehti 5G subscription, which supports Elisa's customers in reducing their own carbon footprint by offsetting emissions during their phone's life cycle with a monthly climate project credit. To our knowledge, this is the first subscription of its kind in the world.



Management of Elisa's compensation portfolio

Updated sustainability targets 2022 onwards



	Impact to society	Sustainable operations
DIGITAL	Number of cyber security exercises with large corporate customers and authorities 2024	Cyber Security Index 2024
SOCIAL	Elisa's high-speed connection availability to all Finnish households 2025	Share of women supervisors 2024
ECONOMIC	Continuous profit growth in accordance with medium term targets 2020-2023	Development of patent portfolio 2024
ENVIRONMENTAL	Carbon handprint improvement 2024	Improvement in network energy efficiency 2024

Independent Assurance Report to the Management of Elisa Corporation

This document is an English translation of the Finnish report

We have been engaged by the Management of Elisa Corporation (hereafter “Elisa”) to provide limited assurance on corporate responsibility indicators presented in the Responsibility section of Elisa’s Annual Report 2021 (hereafter “Corporate Responsibility Information”) for the year ended 31 Dec 2021.

Management’s responsibilities

The Management of Elisa is responsible for the preparation and presentation of the Corporate Responsibility Information in accordance with the reporting criteria, i.e. *GRI Sustainability Reporting Standards* and *SASB Telecommunication Services Sustainability Accounting Standard version 2018-10*, and the information and assertions contained within it. In addition, the Management of Elisa is responsible for the preparation and presentation of the Corporate Responsibility Information in accordance with the EU Taxonomy reporting criteria, i.e. *Regulation EU2020/852* and its delegated acts as well as the company’s own reporting methodology on the topic. The Management is also responsible for determining Elisa’s objectives with regard to sustainable development performance and reporting, including the identification of stakeholders and material issues, and for establishing and maintaining appropriate performance management and internal control systems from which the reported performance information is derived.

Our responsibilities

Our responsibility is to carry out a limited assurance engagement and to express a conclusion based on the work performed. We conducted our assurance engagement on the Corporate Responsibility Information in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements other than Audits or Reviews of Historical Financial Information*, issued by the International Auditing and Assurance Standards Board IAASB. That Standard requires that we plan and perform the engagement to obtain limited assurance about whether the Corporate Responsibility Information is free from material misstatement.

KPMG Oy Ab applies International Standard on Quality Control ISQC 1 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants IESBA, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Procedures performed

A limited assurance engagement on Corporate Responsibility Information consists of making inquiries, primarily of persons responsible for the preparation of information presented in the Corporate Responsibility Information, and applying analytical and other evidence gathering procedures, as appropriate. In the engagement, we have performed the following procedures, among others:

- Interviewed the members of Elisa’s senior management and relevant staff responsible for providing the Corporate Responsibility Information;
- Assessed the application of the *GRI Sustainability Reporting Standards* and *SASB Telecommunication Services Sustainability Accounting Standard version 2018-10* reporting principles and that of *Regulation EU2020/852* and related EU Taxonomy criteria (see above) in the presentation of the Corporate Responsibility Information;
- Assessed data management processes, information systems and working methods used to gather and consolidate the Corporate Responsibility Information;
- Reviewed the presented Corporate Responsibility Information and assessed its quality and reporting boundary definitions;
- Assessed the Corporate Responsibility Information’s data accuracy and completeness through a review of the original documents and systems on a sample basis and;

- Conducted a site session to review the Corporate Responsibility Information on one of Elisa’s sites.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Inherent limitations

Inherent limitations exist in all assurance engagements due to the selective testing of the information being examined. Therefore fraud, error or non-compliance may occur and not be detected. Additionally, non-financial data may be subject to more inherent limitations than financial data, given both its nature and the methods used for determining, calculating and estimating such data.

Conclusion

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report.

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

Based on the procedures performed and the evidence obtained, as described above, nothing has come to our attention that causes us to believe that the information subject to the assurance engagement is not prepared, in all material respects, in accordance with the *GRI Sustainability Reporting Standards*, *SASB Telecommunication Services Sustainability Accounting Standard version 2018-10*, and *Regulation EU2020/852* and its delegated acts.

Helsinki, 14 March 2022
KPMG Oy Ab

Toni Aaltonen
APA

Tomas Otterström
Partner, Advisory

Signatures to the Elisa sustainability and non-financial report

Helsinki, 8 March 2022

Anssi Vanjoki, Chair of the Board

Veli-Matti Mattila, CEO

Clarisse Berggårdh

Seija Turunen

Kim Ignatius

Maher Chebbo

Eva-Lotta Sjöstedt

Antti Vasara

Topi Manner

ESG index

(GRI, SASB, Elisa own)

GRI = Global Reporting Initiative (reporting framework)
SASB = Sustainability Accounting Standard Board (reporting framework)

Abbreviations:

ESG = Environment, Social, Governance (reference to standards and frameworks);
EW = Elisa corporate web page;
EWI = Elisa Investor web pag ;
EWG = Elisa Governance web page;

EWS = Elisa Sustainability web page;
CGR = Corporate Governance report 2021;
CRR = Corporate Remuneration report 2021;
AR = Annual review 2021;
SR = Sustainability report 2021

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
			https://www.unglobalcompact.org/	https://sdgs.un.org/goals	
GRI 102: GENERAL DISCLOSURES (GRI 102, 2016 standard) - Scope: Elisa Corporation					
1. Organizational Profile					
102-1	Name of the organization	EWG - Articles of Association.	X		
102-2	Activities, brands, products, and services	EW - Elisa in brief. Elisa Brands: Elisa, Elisa Saunalahti, Elisa Viihde, Elisa Teleteenused, Elisa Santa Monica, Elisa Polystar, Elisa IndustriQ, Elisa Videra.	X		
102-3	Location of headquarters	EWI - Basic information on the Group.	X		
102-4	Number of countries where the organization operates, and the names of countries where it has significant operations and/or that are relevant to the topics covered in the report	AR, p.17-18.	X		
102-5	Ownership and legal form	EWI - Shareholder structure.	X		
102-6	Markets served	AR, p.4, 17-18; Financial statements 2021.	X		
102-7	Scale of the organization	AR - Financial statements 2021.			
102-8	Number of Employees by Employment Contract, Time Type, Region and Gender	GRI data.	X		UN SDG 10.
102-9	Supply chain	EW - Suppliers, Sustainable supply chain; EWS - Responsible procurement and partnerships; SR - Responsible supply chain, p.20.	X		
102-10	Significant changes to the organization's size, structure, ownership, or supply chain	AR - Financial statements 2021.			
102-11	Precautionary principle or approach addressed by the organisation	EWG - Risk management; CGR - III Descriptions of internal control procedures and main features of risk management systems, p.15.	X		

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
102-12	External initiatives	EWS - Policies and guidelines; EWS - Indices and commitments.			
102-13	Membership of associations	EWS - Stakeholder dialogue.			
2. Strategy					
102-14	Statement from senior decision-maker	AR, p.6.	X		
102-15	Key impacts, risks, and opportunities	EW - Risk management; CGR - III Descriptions of internal control procedures and main features of risk management systems, p.15.; SR, p.6.; GRI data.	X		
3. Ethics and Integrity					
102-16	Values, principles, standards, and norms of behavior	EWS - Ethics and compliance/Code of conduct.	X	UN SDG 16.	
102-17	Mechanisms for advice and concerns about ethics	EWS - Ethics and compliance/Code of conduct; EWS - Whistleblowing.	X	UN SDG 16.	
4. Governance					
102-18	Governance structure	EWG - Governance structure; EWG - Charter and committees; CGR - Board committees, p.3.- p.9.	X		
102-19	Delegating authority	EWS - Management and KPIs; SR - Good governance p.5.	X		
102-20	Executive-level responsibility for economic, environmental, and social topics	CGR - Elisa's governance structure, p.3.; EWG - Governance; SR - Good governance p.5.	X		
102-21	Consulting stakeholders on economic, environmental, and social topics	EWS - Social responsibility/Diverse customers; EWS - Materiality; SR, p.7.	X	UN SDG 16.	

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
102-22	Composition of the highest governance body and its committees	EWG - Governance; CGR - Elisa's governance structure, p.3.	X	UN SDG 10	
102-23	Chair of the highest governance body	EWG - Governance; CGR - Elisa's governance structure, p.3.	X	UN SDG 16.	
102-24	Nominating and selecting the highest governance body	EWG -Appointment and diversity principles for Board members.	X	UN SDG 16.	
102-25	Conflicts of interest	EWG - Governance/Insider and related party policy ; /Transactions of managers; /Management holdings; CGR - Independence of Board members, p.9.	X	UN SDG 16.	
102-26	Role of highest governance body in setting purpose, values, and strategy	CGR - Charter of the Board of Directors, p.5.; SR - Good governance p.5.	X		
102-27	Collective knowledge of highest governance body	CGR - Governance structure, p.3; Charter of the Board of Directors, p.5.			
102-28	Evaluating the highest governance body's performance	CGR - Governance structure, p.3; Charter of the Board of Directors, p.5.	X		
102-29	Identifying and managing economic, environmental, and social impacts	CGR - III Descriptions of internal control procedures and main features of risk management system; Controls, Auditing, p.15.; SR, p.6.	X	UN SDG 16.	
102-30	Effectiveness of risk management processes	CGR - III Descriptions of internal control procedures and main features of risk management system; Controls, Auditing, p.15.; EWG - Risk management; SR, p.6.	X		
102-31	Review of economic, environmental, and social topics	SR, p.5.	X		
102-32	Highest governance body's role in sustainability reporting	SR - Board signatures, p.36.	X		
102-33	Communicating critical concerns	EWS – Whistleblowing. Reviewed as part of regular Compliance report in Audit committee of Elisa's Board of Directors.	X		
102-34	Nature and total number of critical concerns	Elisa received 53 potential misconduct notifications via its' whistleblowing channel. As a result of investigated notifications training, process reviews, communication and other corrective actions were taken.			
102-35	Remuneration policies	CRR; EWG - Remuneration policy.	X		

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
102-36	Process for determining remuneration	CRR; EWG - Remuneration policy.	X		
102-37	Stakeholders' involvement in remuneration	CRR; EWG - Remuneration policy.	X	UN SDG 16.	
5. Stakeholder Engagement					
102-40	List of stakeholder groups	EWS - materiality and stakeholder dialogue	X		
102-41	Employees Covered by Collective Bargaining Agreements	GRI data.	X		
102-42	Identifying and selecting stakeholders	EWS - materiality and stakeholder dialogue	X		
102-43	Approach to stakeholder engagement	EWS - materiality and stakeholder dialogue SR, p.7.	X		
102-44	Key topics and concerns raised	EWS - Materiality and Stakeholder dialogue;	X		
6. Reporting Practice					
102-45	Entities included in the consolidated financial statements	SR - Description of the report, p.3.			
102-46	Defining report content and topic Boundaries	SR - Description of the report, p.3.			
102-47	List of material topics	EWS - Sustainability goals; EWI - Sustainability Key Figures (2014 onwards); EWS - Materiality; GRI data.			
102-48	Restatements of information	SR - Description of the report, p.3.			
102-49	Changes in reporting	SR - Description of the report, p.3.			
102-50	Reporting period	SR - Description of the report, p.3.			
102-51	Date of most recent report	SR - Description of the report, p.3.	X		
102-52	Reporting cycle	SR - Description of the report, p.3.	X		

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
102-53	Contact point for questions regarding the report	SR - Description of the report, p.3.	X		
102-54	Claims of reporting in accordance with the GRI Standards	SR - Description of the report, p.3.	X		
102-55	GRI content index	SR - Description of the report, p.3.	X		
102-56	External assurance	SR - Assurance report, p.35.	X		

TOPIC SPECIFIC CONTENT- Scope: Elisa Corporation, unless otherwise stated

GRI 103: MANAGEMENT APPROACH (GRI 103, 2016 standard)

103-1	Explanation of the material topic and its Boundary	EWS - Materiality and Stakeholder dialogue; SR - Index, p.36., Description of the report, p.3.			
103-2; 103-3	The management approach and its components; Evaluation of the management approach				
	Indirect economic impacts, DMA (Disclosures on Management Approach)	EWS - Economic sustainability SR - Targets and performance, p.10.; Good governance, p.5. - p.10. EW - Research and development;	X		
	Tax, DMA	SR, p.24. EWS - Economic sustainability.			
	Energy, DMA	EWS - Environmental sustainability; SR - Targets and performance, p.10.			
	Water and effluents, DMA	EWS - Environmental sustainability/Environmental Management System			
	Emissions, DMA	EWS - Environmental sustainability; SR - Targets and performance, p.10.			
	Waste, DMA	EWS - Environmental sustainability/Environmental Management System. SR - Targets and performance, p.10.			
	Products and services, DMA	EWS - Environmental sustainability; SR - Targets and performance, p.10.			
	Compliance, DMA	EWS - Code of Conduct.			

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
	Marketing Communications , DMA	EWS - Social sustainability/Diverse customers; Digital sustainability/Safety, security and services for everybody; EW - Customer communication; SR - Targets and performance, p.10.			
	Customer privacy, DMA	EWS - Digital sustainability/Cyber security and privacy; EW - Customer service; SR - Targets and performance, p.10.			
	Customer Health and Safety, DMA	EWS - Digital sustainability/The use of mobile network is safe; SR, p.12. - p.15.			
	Employment, DMA	EWS - Social sustainability/Responsible employer; SR - Targets and performance, p.10. AR, p.15.			
	Diversity and Equal Opportunity, DMA	EWS - Social sustainability/Responsible employer; SR - Targets and performance, p.10.			
	Occupational Health and Safety, DMA	EWS - Social sustainability/Responsible employer; SR - p.17.			
	Training and Education, DMA	EWS - Social sustainability/Responsible employer; SR - Targets and performance, p.10. AR, p.17.			
	Non-discrimination, DMA	EWS - Social sustainability/Responsible employer; EWS - Ethics & Compliance/Code of conduct, Human rights policy; SR - Targets and performance, p.10.			
	Security Practices, DMA	EWS - Digital sustainability/Cyber security and privacy; EW - Data security through Customer Service; SR - Targets and performance, p.10.			

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
	Anti-corruption, DMA	EWS - Ethics and compliance/Code of conduct, Anti-corruption and bribery policy; SR - Targets and performance, p.10., GRI data.			
	Human Rights Assessment, DMA	GRI data; SR - Good governance, p. 5., Compliance development, p. 8., Privacy, p.14.-p.15., Social sustainability, p.17-19., Sustainable supply chain, p. 20.			
	Supplier Social Assessment, DMA	GRI data; SR - Sustainable supply chain p. 20.; EWS - Economic sustainability.			
	Public Policy, DMA	EWS - Management; Stakeholder dialogue; Ethics and compliance/Code of conduct; Policies; GRI data.			
GRI 201: ECONOMIC PERFORMANCE (GRI 201, 2016 standard)					
201-1	Direct economic value generated and distributed	GRI data.		UN SDG 9	
201-2	Financial implications and other risks and opportunities due to climate change	GRI data.		UN SDG 13.	
GRI 203: INDIRECT ECONOMIC IMPACTS (GRI 203, 2016 standard)					
203-1	Development and impact of infrastructure investments and services supported	EWS - Digital sustainability; GRI data. Refer to GRI indicator 201-1, Capital expenditure investments.		UN SDG 9	
203-2	Significant indirect economic impacts	EW - Research and development; EWS - Social sustainability/Responsible employer, Digital sustainability, Environmental sustainability.			
GRI 205: ANTI-CORRUPTION (GRI 205, 2016 standard)					
205-2	Communication and training about anti-corruption policies and procedures	EWS - Policies and guidelines (public policy); SR- Development in compliance p.8. GRI data.	X	UN SDG 16.	
205-3	Confirmed incidents of corruption and actions taken	GRI data.	X	UN SDG 16.	

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
GRI 207: TAX (GRI 207, 2019 standard)					
207-1	Approach to tax	SR, p.24.		UN SDG 10.	
207-2	Tax governance, control, and risk management	SR, p.24.		UN SDG 10.	
207-3	Stakeholder engagement and management of concerns related to tax	SR, p.24.		UN SDG 10.	
207-4	Tax Country-by-country reporting	GRI data.		UN SDG 10.	
GRI 302: ENERGY (GRI 302, 2016 standard)					
302-1	Energy consumption within the organization	Elisa Energy and GHG Emission Disclosure 2021 GRI data.	X	UN SDG 13.	
302-3	Energy intensity	Elisa Energy and GHG Emission Disclosure 2021 GRI data.	X	UN SDG 13.	
302-4	Energy saved due to conservation and efficiency improvements	Elisa Energy and GHG Emission Disclosure 2021 GRI data.	X	UN SDG 13.	
GRI 303: WATER AND EFFLUENTS (GRI 303, 2018 standard)					
303-1	Interactions with water as a shared resource	EWS -Environmental sustainability/Recycling and other environmental impacts			
303-2	Management of water discharge-related impacts	EWS -Environmental sustainability/Recycling and other environmental impacts			
303-3	Water withdrawal	EWS - Environmental sustainability/Other environmental considerations; GRI data.			
303-4	Water discharge	EWS - Environmental sustainability/Other environmental considerations; GRI data.			
303-5	Water consumption	EWS - Environmental sustainability/Other environmental considerations; GRI data.			

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
GRI 305: EMISSIONS (GRI 305, 2016 standard)					
305-1	Direct (Scope 1) GHG emissions	EWS -Environmental sustainability/ Elisa Energy and GHG Emission Disclosure 2021 GRI data.	X	UN SDG 13.	
305-2	Indirect (Scope 2) GHG emissions	EWS -Environmental sustainability/ Elisa Energy and GHG Emission Disclosure 2021 GRI data.	X	UN SDG 13.	
305-3	Other relevant indirect (Scope 3) GHG emissions	EWS -Environmental sustainability/ Elisa Energy and GHG Emission Disclosure 2021 GRI data.	X	UN SDG 13.	
305-4	GHG emissions intensity	EWS -Environmental sustainability/ Elisa Energy and GHG Emission Disclosure 2021 GRI data.	X	UN SDG 13.	
305-5	Reduction of GHG emissions	EWS -Environmental sustainability/ Elisa Energy and GHG Emission Disclosure 2021 GRI data.	X	UN SDG 13.	
GRI 306: WASTE (GRI 306, 2020 standard)					
306-1	Waste generation and significant waste-related impacts	EWS -Environmental sustainability/Recycling and other environmental impacts.			
306-2	Management of significant waste-related impacts	EWS -Environmental sustainability/Recycling and other environmental impacts.			
306-3	Waste generated	Environmental sustainability/Recycling and other environmental impacts; GRI data.	X		
306-4	Waste diverted from disposal by recovery operation	Environmental sustainability/Recycling and other environmental impacts; GRI data.	X		
306-5	Waste directed to disposal by disposal operation	Environmental sustainability/Recycling and other environmental impacts; GRI data.	X		
GRI 307: ENVIRONMENTAL COMPLIANCE (GRI 307, 2016 standard)					
307-1	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	GRI data.	X	UN SDG 16.	

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
GRI 401: EMPLOYMENT (GRI 401, 2016 standard)					
401-1	New employee hires (amount and share) and employee turnover by age group, gender and region	GRI data.	X		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	GRI data.		UN SDG 10.	
GRI 403: OCCUPATIONAL HEALTH AND SAFETY (GRI 403, 2018 standard)					
403-1	Occupational health and safety management system	EWS - Social sustainability/Responsible employer, Wellbeing and safety; SR, p.18.			Elisa discloses this indicator own way.
403-2	Hazard identification, risk assessment, and incident investigation	EWS - Social sustainability/Responsible employer, Wellbeing and safety; Digital sustainability/The use of mobile network is safe; SR, p.20.			Elisa discloses this indicator own way.
403-3	Occupational health services	EWS - Social sustainability/Responsible employer, Wellbeing and safety; SR, p.18.			Elisa discloses this indicator own way.
403-4	Worker participation, consultation, and communication on occupational health and safety	EWS - Social sustainability/Responsible employer, Wellbeing and safety; SR, p.18.			Elisa discloses this indicator own way.
403-5	Worker training on occupational health and safety	EWS - Social sustainability/Responsible employer, Wellbeing and safety; SR, p.18.			
403-6	Promotion of worker health	EWS - Social sustainability/Responsible employer, Wellbeing and safety; SR, p.18.			
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	EWS - Social sustainability/Responsible employer, Wellbeing and safety; SR, p.18.			Elisa discloses this indicator own way.
403-8	Workers covered by and OHS management system (Health and Safety Committees)	GRI data, SR, p.18.			Elisa discloses this indicator own way.

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
403-9	Work related (occupational) injuries	GRI data; SR, p.18.			Elisa discloses this indicator own way.
403-10	Work related (occupational) ill health	GRI data; SR, p.18.		UN SDG 16.	Elisa discloses this indicator own way.
GRI 404: TRAINING AND EDUCATION (GRI 404, 2016 standard)					
404-1	Average hours of training per year per employee by gender, and by employee category	GRI data.	X	UN SDG 10.	
404-2	Programs for upgrading employee skills and transition assistance programs	AR - Personnel review, p.15.			
404-3	Employees receiving regular performance and career development reviews, by gender and by employee category	GRI data.	X	UN SDG 10.	
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY (GRI 405, 2016 standard)					
405-1	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	GRI data.	X	UN SDG 5.	
GRI 406: NON-DISCRIMINATION (GRI 406, 2016 standard)					
406-1	Incidents of discrimination and corrective actions taken	GRI data.	X	UN SDG 5.	
GRI 410: SECURITY PRACTICES (GRI 410, 2016 standard)					
410-1	Security personnel trained in human rights policies or procedures	GRI data.	X	UN SDG 16.	
GRI 412: HUMAN RIGHTS ASSESSMENT (GRI 412, 2016 standard)					
412-1	Operations that have been subject to human rights reviews or impact assessments	GRI data.			
412-2	Employee training on human rights policies or procedures	GRI data.			
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	GRI data.			

ESG framework	Description	Response or comment	UN Global Compact	UN Sustainable Development Goals	Omission
GRI 414 SUPPLY CHAIN					
414-1	New suppliers that were screened using social criteria	SR, p.20.; GRI data.		UN SDG 16.	
414-2	Negative social impacts in the supply chain and actions taken	GRI data.		UN SDG 16.	
GRI 415: PUBLIC POLICY (GRI 415, 2016 standard)					
415-1	Total value of political contributions by country and recipient/beneficiary	GRI data.	X	UN SDG 16.	
GRI 416: CUSTOMER HEALTH AND SAFETY (GRI 416, 2016 standard)					
416-2	Incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes	GRI data.		UN SDG 16.	
GRI 417: MARKETING AND LABELING (GRI 417, 2016 standard)					
417-3	Incidents of non-compliance concerning marketing communications	GRI data.		UN SDG 16.	
GRI 418: CUSTOMER PRIVACY (GRI 418, 2016 standard)					
418-1	Substantiated complaints regarding breaches of customer privacy and losses of customer data	GRI data.		UN SDG 16.	Elisa discloses this indicator own way.

SASB (Technology & Communications Sector - Telecommunication Services Sustainability Accounting Standard, 2018-10)

ACTIVITY METRIC (Elisa Corporation)

TC-TL-000.A	Number of wireless (mobile) subscribers	SASB data; EWI - Results Centre/Operational Data Q4 2021
TC-TL-000.B	Number of wireline (fixed) subscribers	SASB data; EWI - Results Centre/Operational Data Q4 2021
TC-TL-000.C	Number of broadband subscribers	SASB data; EWI - Results Centre/Operational Data Q4 2021
TC-TL-000.D	Network traffic	SASB data; EWI - Results Centre/Operational Data Q4 2021

ACCOUNTING METRIC

Environmental Footprint of Operations

TC-TL-130a.1	Total energy consumed	SASB data.
	Percentage grid electricity	SASB data.
	Percentage renewable	SASB data.
	Conversion factors used	EWS - Environmental sustainability/Elisa Energy and GHG Emission Disclosure 2021
	PUE (Power Usage Effectiveness), 12 month average weighted figure	SASB data.

Data Privacy

TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	EWS - Tietosuoja (in Finnish); SASB data. EW - Marketing and customer communication (Markkinointiluvut ja asiakasviestintä -in Finnish). EW - Elisa's data protection principles.
TC-TL-220a.2	Number of customers whose information is used for secondary purposes	SASB data.
TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	SASB data.
TC-TL-220a.4	1. Number of law enforcement requests for customer information, 2. number of customers whose information was requested, 3. percentage resulting in disclosure	SASB data.

Data Security

TC-TL 230a.1	1.Number of data breaches, 2.percentage involving personally identifiable information (PII), 3.number of customers affected	SASB data.
TC-TL 230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	SASB data. EW - Elisa cyber security services are described in Elisa web pages (in Finnish).

Product End-of life Management

TC-TL-440a.1	(1) Materials recovered through take back programs	SASB data.
	(2) Percentage reused	SASB data.
	(3) Percentage recycled	SASB data.
	(4) Percentage landfilled	SASB data.

Competitive Behavior & Open Internet

TC-TL-520a.1	Amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	SASB data.
TC-TL-520a.2	Average actual sustained download speed of (1) owned and commercially-as- sociated content and (2) non-associated content	Elisa does not disclose download speed.
TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices	SASB data.

Managing systemic risks from technology disruptions

TC-TL-550a.1	(1) System average interruption frequency and (2) customer average interruption duration	SASB data.
TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interrup- tions	SASB data.

ELISA OWN INDICATOR

Elisa objectives and success indicators	Reducing the number of disturbances in mobile network	Own data.
	Cyber security in relation to cyber security index	Own data.
	Data Protection Training	Own data.
	Personal Data Inquiries	Own data.
	Code of Conduct training completion	Own data.
	Employee Engagement score	Own data.
	Customer Satisfaction in Relation to NPS Target	Own data.
	Supply chain sustainability development	Own data.
	Contribution to the Society	Own data.
	Science Based Target (SBTi) performance	Own data.

EU TAXONOMY ELIGIBLE ECONOMIC ACTIVITIES

Information about EU taxonomy eligible economic activities	Disclose qualitative and quantitative information of eligible economic activities.	SR, p.23.
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Sustainability-linked revolving credit facility indicators

Increase of the share of female leadership positions [%]	SR - ESG data, p.71.
Decrease of the share of population without access to high speed connection [%]	SR - ESG data, p.71.
Ensure renewable energy sourcing, and commit into increasing share of PPAs in renewables to increase the impact	SR - ESG data, p.71.

Digital Sustainability

GRI Indicators

Customer privacy

Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data [pcs] (418-1)	2019	2020	2021	Description	Data includes
	1	6	8	In addition to Data Protection Ombudsman responses, Elisa does not report other complaints nor breaches.	Scope: Elisa Finland, Elisa Estonia and Elisa Polystar.

SASB Indicators

Activity Metrics	2019	2020	2021		
Number of wireless subscribers [pcs] (TC-TL-000.A)	4,736,500	4,798,100	4,919,100	2020 figures have been corrected. 2019 figures added.	Scope: Elisa Finland and Elisa Estonia.
Number of wireline subscribers [pcs] (TC-TL-000.B)	1,526,700	1,527,600	1,477,000	2020 figures have been corrected. 2019 figures added.	Scope: Elisa Finland and Elisa Estonia.
Number of broadband subscribers [pcs] (TC-TL-000.C)	689,500	701,100	666,200	2020 figures have been corrected. 2019 figures added.	Scope: Elisa Finland and Elisa Estonia.
Network traffic [million gigabytes] (TC-TL-000.D)	1,000	1,360	1,643	Elisa discloses this indicator own way. Elisa does not publish fixed network traffic numbers.	Scope: Mobile network Elisa Finland.

Data Privacy

Data includes

Description of policies and practices relating to behavioral advertising and customer privacy (TC-TL-220a.1)

Processing of personal data is based on the Elisa's Data Protection Policy which defines the implementation of data protection requirements at Elisa's operations.

The policy is mandatory for Elisa, its subsidiaries, and suppliers based on the contracts.

Data protection policy as well as principles and guidelines complementing the policy are reviewed frequently and they include e.g.

- Processing of personal data
- **Data protection principles** (acts as privacy notice)
- **Advertising and customer privacy policies, principles, and practical guidance** (in Finnish)
- Guidance on Electronic Direct Marketing
- Requirements of the Processing of Traffic and Location Data for marketing
- Employees Data Protection Principles (acts as privacy notice)
- Principles of personal data processing in the staff recruitment process - (acts as privacy notice)
- Practices related to Data protection organization, assessments, monthly overview of EU data protection breaches , analyzes

Number of customers whose information is used for secondary purposes (TC-TL-220a.2)

Elisa does not disclose this indicator. Elisa's data protection principles describe what information we collect and for what purpose, and how we handle the information.

Provided the principles and policies relating to the customer personal data, limitations and requirements for further processing:

- Principles of Personal Data Processing
- Data Protection Policy (privacy notice)
- Confidentiality of Communications and Principles of Location Data Processing

Total amount of monetary losses as a result of legal proceedings associated with customer privacy (TC-TL-220a.3)

Elisa is not disclosing this information, instead reports significant legal consequences in Elisa's financial statements.

(1) Number of law enforcement requests for customer information, (2) number of customers whose information was requested, (3) percentage resulting in disclosure (TC-TL-220a.4)

Elisa has process for managing data breaches and each case is documented. Elisa does not disclose security incidents or breaches as numbers.

Data Security

Data includes

(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of customers affected (TC-TL-230a.1)

Elisa has process for managing data breaches and each case is documented. Elisa does not disclose security incidents or breaches as numbers.

Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards (TC-TL-230a.2)

Elisa's operational risk management is an ongoing process and is built into the organisation's normal operations. The process activates all Elisa employees and partners to identify and report risks related to processes, systems, technology and other operational functions. Operational risk management enables transparency in the potential adverse events and opportunities of operations, ensures business continuity and optimizes costs through risk assessment, management and monitoring. The process is compliant with ISO 27005 and ISO 31000 international standards.

Elisa cyber security services are described in [Elisa web pages](#) (in Finnish)

Managing systemic risks from technology disruptions

Data includes

(1) System average interruption frequency and (2) customer average interruption duration (TC-TL-550a.1)

System average interruption frequency: 0.19.
Customer average interruption duration:19h.

Scope: Elisa Finland

Discussion of systems to provide unimpeded service during service interruptions (TC-TL-550a.2)

Elisa's network is designed to be resilient and our operations is based on ITIL model. In operations our focus is in automation and proactive service monitoring. Elisa's network design principles are based on optimal redundancy. This covers both the use of alternative physical locations, routes and redundant equipment. Also the utility services are redundant by using e.g. generators and accumulators. In Finland authorities set requirements for redundancy and in addition to those requirements our design principles also require the utilization of redundancy to avoid Major or Business Critical incidents (TRAFICOM/54045/03.04.05.00/2020).

Scope: Elisa Finland

Elisa's network and services are built by using equipment only from selected vendors and all new systems and software are tested before deployment. The purpose of testing is to verify the compliance to both existing network infrastructure and the functionality of tested entity. Elisa's operations is both proactive and automated. The aim is to handle all incidents before those affect to customers services. If the incident can't be avoided the time to recover is typically short because of automated recovery actions. To understand customer experience Elisa has a Cyber Security and Service Management Center (cSOC) which is monitoring service availability and customer experience 24/7. Based on situational awareness the cSOC is responsible for both internal and external incident communication and also acts as a centralized management function for repair of major and business critical incidents and escalation cases.

Every incident in Elisa's network is managed by trouble ticketing system. Incident specific trouble tickets are populated with relevant data such as incident time, the nature on the incident, mitigative actions and actual repair. This data is used for improving the process and other quality affecting aspects by analysis, classification and machine learning algorithms.

In Elisa we have a defined process for learning from successes and mistakes. Every incident meeting pre-defined criteria is walked through and findings are formulated as improvement tasks to relevant stakeholders. Executing the tasks is managed by Problem Management function.

Own Indicators

	2019	2020	2021	Description	Data includes
Data Protection Training [%]	67%	73%	75%	2021 figures includes employee headcount figure of Elisa Finland(Oyj) and Elisa Estonia.	Scope: Elisa Finland and Elisa Estonia
Cyber security in relation to cyber security index [%]	72%	72%	73%		Scope:Elisa Finland
Reducing the number of disturbances [%]	93%	96%	97%		Scope:Elisa Finland
Personal Data Inquiries [pcs]	16,000	16,777	16,558		Scope: Elisa Finland and Elisa Estonia

Social Sustainability

GRI Indicators

General Disclosures related to Employees

Total Number of Employees by Employment Contract, Time Type, Region and Gender [prs] (102-8)

	2019	2020	2021	Description	Data includes
Personnel in total, 31.12.2021	5,617	5,744	5,947		
Permanent contract	5,515	5,649	5,858	Due to update in the data collection methodology, historical data have been revisited.	
Finland	4,272	4,350	4,330		
Estonia	961	971	926		
Sweden	150	142	142		
Spain	51	65	61		
Germany	N/A	7	87		
Other countries	81	114	312		
Men	3,773	3,859	3,951		
Women	1,742	1,790	1,807		
Other or Unknown	0	0	100		
Temporary contract	102	95	89		
Finland	52	57	43		
Estonia	46	34	38		
Sweden	3	3	4		
Spain	1	1	0		
Germany	N/A	0	3		
Other countries	0	0	1		
Men	50	49	34		
Women	52	45	48		
Other or Unknown	0	1	7		

Full-time employees	4,553	4,711	5,002	Due to update in the data collection methodology, historical data have been revisited.
Finland	3,382	3,488	3,561	
Estonia	907	923	881	
Sweden	148	141	143	
Spain	52	65	61	
Germany	N/A	6	72	
Other countries	64	88	284	
Men	3,045	3,176	3,348	
Women	1,508	1,535	1,553	
Other or Unknown	0	0	101	
Part-time employees	1,064	1,033	945	
Finland	942	919	812	
Estonia	100	82	83	
Sweden	5	4	3	
Spain	0	1	0	
Germany	N/A	1	18	
Other countries	17	26	29	
Men	778	738	637	
Women	286	294	302	
Other or Unknown	0	1	6	

Collective bargaining agreements

Percentage of Total Employees Covered by Collective Bargaining Agreements [%] (102-41)	2019	2020	2021	Data description	Data includes
	73%	73%	73%	Historical data have been retroactively corrected.	

Anti-corruption

Communication and training about anti-corruption policies and procedures [%] (205-2)

Percentage of employees that the organization's anti-corruption policies and procedures have been communicated.

Data includes
Scope: Elisa Finland and Elisa Estonia

Anti-corruption policies have been communicated to all employees [100%] in Elisa Estonia and Elisa Finland. In addition, Code of Conduct policies have been communicated to all the Elisa employees.

Percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated.

Anti-corruption policies have been communicated to all the governance bodies [100%].

Percentage of employees completing the training by region.

	2019	2020	2021	Description	Data includes
Finland	N/A	N/A	69%		Scope: Elisa Finland and Elisa Estonia
Estonia	N/A	N/A	71%		

Confirmed incidents of corruption and actions taken [pcs] (205-3)

No confirmed incidents in 2021.

Employment

Total number of new employee hires and employee turnover by age group, gender and region [prs] (401-1)

New employee hires

	2019	2020	2021	Description	Data includes
New employee hires	1,264	1,322	1,283		
Finland	966	1,070	969		
Estonia	249	182	226		
Sweden	14	10	4		
Spain	6	25	8		
Germany	N/A	3	7		
Other countries	29	32	69		
Men	882	894	862		
Women	382	428	386		
Other or Unknown	0	0	35		
Under 30 years	898	935	880		
30-39 years	216	227	262		
40-49 years	106	115	89		
Over 49 years	44	45	52		

Terminated employments	1,267	1,184	1,321
Finland	958	954	995
Estonia	269	192	268
Sweden	16	12	12
Spain	12	7	14
Germany	N/A	N/A	0
Other countries	12	19	32
Men	829	793	889
Women	438	391	407
Other or Unknown	0	0	25
Under 30 years	745	765	813
30-39 years	278	207	272
40-49 years	133	106	131
Over 49 years	111	106	105

Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation (401-2)

In general level, there are no differences.

Occupational health and safety

Workers covered by OHS management system [%] (403-8)	2019	2020	2021	Description	Data includes
	95%	97%	94%	Elisa discloses this indicator own way. Calculated as Elisa's own employees coverage %.	

Work related (occupational) injuries and ill-health. Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities, by region and by gender (403-9, 403-10)

	2019	2020	2021	Description	Data includes
Working hours [h]					
Average worked hours [hours/employee]	1,473	1,480	1,367	Annual figure.	
Injury rate (IR)				Elisa discloses these indicators in own way.	
Finland					
Commuting injuries	7	4	3		
Working time injuries	5	3	4		
Estonia					
Commuting injuries	1	0	0		
Working time injuries	1	1	2		
Sweden					
Commuting injuries	0	0	0		
Working time injuries	0	0	0		
Spain					
Commuting injuries	13	0	0		
Working time injuries	0	0	0		
Germany					
Commuting injuries	N/A	0	0		
Working time injuries	N/A	0	0		
Other Countries					
Commuting injuries	0	0	0		
Working time injuries	5	0	0		
Rate of occupational diseases (ODR)					
Finland	0	0	0		
Estonia	0	0	0		
Sweden	0	0	0		
Spain	0	0	0		

Germany	0	0	0
Other Countries	0	0	0

Lost day rate (LDR)

Finland	185	161	253
Estonia	0	0	0
Sweden	0	0	0
Spain	0	0	0
Germany	N/A	0	0
Other Countries	0	0	0

Absentee rate (AR)

Finland	3%	3%	4%
Estonia	7%	4%	4%
Sweden	0%	0%	2%
Spain	0%	2%	1%
Germany	N/A	26%	4%
Other Countries	0%	0%	1%

Commuting injuries (own employees total)

Finland	42	27	19
Estonia	1	0	0
Sweden	0	0	N/A
Spain	1	0	0
Germany	0	0	0
Other Countries	0	0	0
Sub-contractors	0	0	0

Scope: Elisa Finland and
Elisa Estonia

Work-related recordable injuries (own employees total)

Finland	32	20	22
Estonia	1	1	3
Sweden	0	0	N/A

Spain	0	0	0	Scope: Elisa Finland and Elisa Estonia
Germany	0	0	0	
Other Countries	1	0	0	
Sub-contractors	39	17	6	
Work related high-consequence injuries (own employees total)	0	0	0	Scope: Elisa Finland and Elisa Estonia
Finland	0	0	0	
Estonia	0	0	0	
Sweden	0	0	0	
Spain	0	0	0	
Germany	0	0	0	
Other Countries	0	0	0	
Sub-contractors	2	8	2	
Occupational diseases (own employees total)	0	0	2	Scope: Elisa Finland and Elisa Estonia
Finland	0	0	2	
Estonia	0	0	0	
Sweden	0	0	N/A	
Spain	0	0	0	
Germany	0	0	0	
Other Countries	0	0	0	
Sub-contractors	0	3	0	
Work related fatalities (due to injuries or occupational ill-health) (own employees total)	0	0	0	Scope: Elisa Finland and Elisa Estonia
Finland	0	0	0	
Estonia	0	0	0	
Sweden	0	0	N/A	
Spain	0	0	0	
Germany	0	0	0	
Other Countries	0	0	0	
Sub-contractors	0	0	0	

Lost day incidents [days] (own employees total)	156	137	192	
Finland	156	137	192	
Estonia	0	0	0	
Sweden	0	0	0	
Spain	0	0	0	
Germany	N/A	0	0	
Other Countries	0	0	0	
Sub-contractors	57	59	41	Scope: Elisa Finland and Elisa Estonia

Absentees [days] (own employees total)	43,898	39,179	51,294	
Finland	29,204	30,315	39,172	
Estonia	14,609	8,406	9,546	
Sweden	0	0	830	
Spain	0	218	168	
Germany	N/A	240	846	
Other Countries	85	0	732	
Sub-contractors	N/A	279	97	Scope: Elisa Finland and Elisa Estonia

Training and education

Average hours of training per year per employee by gender and by employee category [h] (404-1)	2019	2020	2021	Description	Data includes
Average training hours per employee			11	2020 data have been retroactively corrected. 2021 onwards, the employee categorisation has been updated.	
Men	8	19	10		
Women	11	11	12		
Other or Unknown	0	6	7		
Senior management	5	9	14		
Middle management	14	7	21		
Other employees	8	19	10		

Employees receiving regular performance and career development reviews by gender and by employee category [prs] (404-3)

	2019	2020	2021	Description	Data includes
Employees receiving regular performance and career development reviews [%]	75%	73%	84%	2021 onwards, the employee categorisation has been updated.	
Men	2,850	2,827	3,299		
Women	1,337	1,390	1,570		
Other or Unknown	0	0	94		
Senior management	150	138	228		
Middle management	887	934	488		
Other employees	3,150	3,145	4,247		

Diversity and equal opportunity

Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity [prs] (405-1)

	2019	2020	2021	Description	Data includes
Elisa's Executive Board [prs]	11	11	11		
Women	2	2	2		
Men	9	9	9		
Under 30 years	0	0	0		
30-39 years	0	0	0		
40-49 years	2	3	3		
Over 49 years	9	8	8		
Elisa's Board of Directors [prs]	7	7	8		
Women	3	3	3		
Men	4	4	5		
Under 30 years	0	0	0		
30-39 years	0	0	0		
40-49 years	1	1	1		
Over 49 years	6	6	7		

Management teams of business units [prs]	85	93	95	
Women	31	33	43	
Men	54	60	52	
Under 30 years	0	0	0	
30-39 years	6	5	6	
40-49 years	42	49	41	
Over 49 years	37	39	48	
Corporate Responsibility Management Board [prs]	11	14	8	
Women	6	9	5	
Men	5	5	3	
Under 30 years	0	0	0	
30-39 years	1	1	0	
40-49 years	6	8	3	
Over 49 years	4	5	5	
Breakdown of employees by gender [%]				
Men	68%	68%	67%	
Women	32%	32%	31%	
Other or Unknown	0%	0%	2%	
Breakdown of employees by age [%]				
Under 30 years	30%	26%	25%	
30-39 years	25%	29%	30%	
40-49 years	18%	26%	26%	
Over 49 years	27%	19%	19%	
Breakdown of employees by employee categories [%]				
Senior management	3%	3%	4%	2021 onwards, the employee categorisation has been updated.
Middle management	18%	20%	10%	
Other employees	79%	77%	86%	

Non-discrimination

Incidents of discrimination and corrective actions taken [pcs] (406-1)

3 clarified cases during 2021. All the cases are closed after taking the corrective measures.

Security practices

Security personnel trained in human rights policies or procedures [%] (410-1)	Description	Data includes
79% of external security guards working in Elisa Finland have completed Elisa Code of Conduct policy training.	2021 onwards, the figure only includes the external security guards.	

Human rights assessment

Operations that have been subject to human rights reviews or impact assessments (412-1)	Description	Data includes
Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country		
Elisa Corporation was assessed for its human rights responsibility and disclosure as a part of Status of Human Rights Performance of Finnish Companies (SIHTI) project using Core UNGP Indicators methodology. The result of the assessment was utilized to improve Elisa's policies in regard to human rights. In addition to this, Elisa Corporation has carried out its own human rights due diligence assessment within its supply chain, M&A, and in its relevant business operations cases.	Elisa reports this indicator in its own way.	

Employee training on human rights policies or procedures (412-2)	Description	Data includes
Total number of hours in the reporting period devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations.	Elisa reports this indicator in its own way.	
Elisa Corporation employees hours were devoted to compulsory Code of Conduct training that introduces to the basics of human rights, voluntary in-depth training in human rights policy, compulsory data protection training, and voluntary Code of Ethical Purchase training.		

Percentage of employees trained during the reporting period in human rights policies or procedures concerning aspects of human rights that are relevant to operations [%]	Description	Data includes
93% of Elisa employees have completed the compulsory Code of Conduct training that introduces to the basic of human rights policy. In addition to that, 100% of procurement and corporate responsibility team members have completed the renewed Code of Ethical Purchase training, more than 150 employees have completed voluntary training in human rights policy and 75% employees in Elisa Finland and Estonia have completed the data protection training.	Elisa reports this indicator in its own way.	

Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening (412-3)	Description	Data includes
Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.		
Elisa Corporation in 2021 has utilized significant resources in renewing the human rights policy and conducting human rights policy training. Investments have also been made in conducting human rights due diligence in M&A. In both of the former cases, Elisa used a third-party agency. In addition, Elisa Corporation is a member of JAC(Joint Audit Co-operation) and conducts 5 yearly audits of the supply chain.	Elisa reports this indicator in its own way.	

Suppliers social assessment

New suppliers that were screened using social criteria [%] (414-1)	2019	2020	2021	Description	Data includes
	N/A	N/A	0%	Elisa reports this indicator in its own way.	
Negative social impacts in the supply chain and actions taken (414-2)				Elisa reports this indicator in its own way.	
Total suppliers assessed [pcs]	116	76	71	2019 and 2020 figures have been earlier reported in 414-1 as pcs.	
Number of suppliers identified as having significant actual and potential negative social impacts. [pcs]	N/A	N/A	34		
Significant actual and potential negative social impacts identified in the supply chain.[pcs]	584	665	402		
Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment [%]	N/A	N/A	100%		
Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why [%]	N/A	N/A	0%		

Public policy

Total value of political contributions by country and recipient/beneficiary (415-1)

No political contributions in 2021.

Customer health and safety

Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle, by type of outcomes [pcs] (416-2)

No confirmed incidents in 2021.

Marketing and labeling

Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship, by type of outcomes [pcs] (417-3)

One case in 2021 and closed.

Own Indicators

	2019	2020	2021	Description	Data includes
Code of Conduct training completion [%]	63%	84%	93%	2021 figure excludes TenForce NV headcount which contributes to less than 1% of total Elisa headcount and employees on longer sick leaves, absences and maternity leaves.	
Contribution to the Society [%]	N/A	N/A	88%	Calculated as performance against annual target (27).	Scope: Elisa Finland and Elisa Estonia
Customer Satisfaction in Relation to NPS Target [%]	93%	93%	81%	Calculated as performance against annual target (32).	Scope: Elisa Finland and Elisa Estonia

Supply chain sustainability development

Supply chain audits performed and supply chain responsibility is included in Elisa Vendor Management process. 100% of procurement teams and corporate responsibility teams have completed the "Elisa Code of Ethical purchasing" training.

Scope: Elisa Finland and Elisa Videra

Employee Engagement [%]

95%

The performance is calculated as percentage of score to annual target (80).

Scope: Elisa Finland

Increase of the share of female in leadership positions [%]

The target has been achieved. As of 31.12.2021, Elisa's share of female in leadership positions is 27%.

This indicator is part of Sustainability Criteria of Elisa's Sustainability linked loan.

2021 is the first year Elisa is reporting this indicator.

Scope: Elisa Oyj, Elisa Videra Oy, Elisa Santa Monica Oy, Fenix Solutions Oy.

Decrease of the share of population without access to high speed connection [%]

The target has been achieved. As of 31.12.2021, only 27.5% of the households are without the access to high speed connection.

This indicator is part of Sustainability Criteria of Elisa's Sustainability linked loan.

2021 is the first year Elisa is reporting this indicator.

Scope: Elisa Finland

Economic Sustainability

GRI Indicators

Economic Performance

Direct economic value generated and distributed [EUR million] (201-1)	2019	2020	2021	Description	Data includes
Net sales	1,844	1,895	1,998	Includes financial incomes.	
Suppliers and partners	868	888	936		
Personnel remuneration	320	326	374		
Dividends and interests	301	310	325		
Taxes and other public obligations	68	70	77	Financial statement's income tax of EUR 75 million has EUR 2 million negative change in deferred tax assets and liabilities, which is not included in the corporate tax in tax footprint.	
Capital expenditure investments	256	266	265		
Community Investments	N/A	N/A	0.03	2021 is the first year, Elisa is reporting this figure.	
Taxes and tax-like payments	457	485	531		
Corporate tax	68	70	77	Financial statement's income tax of EUR 75 million has EUR 2 million negative change in deferred tax assets and liabilities, which is not included in the corporate tax in tax footprint.	
Value-added tax	255	253	275		
Income tax and withholding tax	102	121	132		
Statutory employer's social insurance payments and other taxes	22	24	29		
Public fees	10	17	18		

Financial implications and other risks and opportunities due to climate change (201-2)

Risk	Description	Impact assesment	Risk management/opportunity
Extreme weather phenomena due to climate change	Climate change causes extreme weather phenomena, which can cause interruptions in Elisa's services from e.g. power failures, but also for example disruptions in the supply chain logistics.	Very likely on a short term. An increase in interruptive events will cause higher costs for personnel and replacement of broken equipment. Estimated costs vary between EUR 0.2-2.0m depending on frequency of events and other circumstances.	Enabling sustainable solutions around mobile technology: Elisa has in place a comprehensive real-time monitoring system for network disturbances, identifying problematic issues and enabling rapid repairs. We estimate that demand for real-time measurement and monitoring services provided by Elisa will increase in the future.
Average temperature changes due to global warming	Rising average temperatures and heat waves will increase the need for cooling in Elisa's telefacilities and other premises.	Very likely on a medium term. Costs will increase due to higher electricity consumption incurred from investments in cooling systems. We estimate that the implication could be about 2% growth in electricity consumption.	Reducing footprint through long-term work on energy efficiency: Elisa has three data centres in the Helsinki metropolitan region, which direct their heat loss energy to district heating. We also utilise heat loss energy in our office environments. We see opportunities in scaling up energy efficiency innovations.
Increasing costs due to regulations and energy taxes	The Paris agreement strives to limit the average global temperature increase to 1.5°C, and to update national targets every five years to keep raising the ambitions.	Likely on a short-term. Estimated implications of carbon market pricing for Elisa are less than 1% of operational costs. Average electricity price is expected to grow due to requirements regarding the production share of renewable energy.	Curbing emissions by utilising renewable and reused energy: Elisa is in a comparably good position regarding EU Emission Trading System (ETS) schemes. We have set science-based targets (SBTi) around the Paris agreement and signed up for Finland's energy efficiency agreement in line with the EED. Elisa has offered its customers carbon neutral services since 2020.
Stakeholders expecting higher level of climate action	Climate change increases the environmental awareness of Elisa's stakeholder groups. Demands for climate reporting to stakeholders is increasing, as well as the requirements for climate-friendly operations. This adds pressure on investments and operations.	Likely on medium term. According to the Sustainable Brand Index report 2021, two thirds of consumers consider sustainability issues when making purchase choices. Confusion about our climate actions among consumers, might lead to less demand for existing products.	Developing new business areas by innovations in sustainability: We set ambitious targets and constantly work on ways to reduce our carbon footprint still, for example through a group-wide working group that manages energy efficiency, and by incentivising our partners. Elisa has in some cases been able to turn its own footprint reductions into handprint services. For example, our international Elisa Polystar, Elisa IndustrIQ, and also Elisa Videra businesses provide means for our customers to reduce their own carbon footprint.
Stakeholder reluctance to participate in climate action	A significant part of the ICT industry's environmental impacts come from the manufacturing of devices. To achieve our ambitious climate-related goals, it is crucial to engage key stakeholders such as supply chain partners around climate change mitigation.	Unlikely on medium term. Legislative requirements and standards are expected to drive most supply chain stakeholders in a more sustainable direction. Not achieving Net Zero commitments within the industry would be a big setback from a climate change mitigation point of view.	Integrating circular economy with daily business operations: Reducing environmental impacts of devices, by paying attention to durability, by offering repair services, and refurbishment and sales of used devices, and finally arranging recycling in safe ways are examples by Elisa. We also take part in the Joint Audit Cooperation (JAC) that together with other operators assesses and develops sustainable approaches with important multinational ICT suppliers. We take part in similar efforts also in GSMA.
Other issues diverting attention from climate action	Earth is a system, where climate change can radically affect natural ecosystems and unleash threats that directly or indirectly might cause world-wide system shocks, in a similar way to COVID-19.	More likely than not on long term. Exceptional circumstances might decrease revenues, due to less demand for products and services or because of various supply chain issues. Attention among customers, and in the value chain, might also be diverted from climate action during difficult times.	Enabling sustainable operations through low-emission services: In times of transformation, adaptability becomes a vital capability. This always means that we take care of our basic tasks in all circumstances. We help society accommodate to a challenging new situation, while actively innovating new ways to support those in the most vulnerable positions. We can help our customers cope with even dramatic change by supporting them when taking a digital leap and e.g. adapt to a new normal of distance work.

Tax

Tax Country-by-country reporting [EUR million] (207-4)			2019	2020	2021	Description	Data includes
Finland	N/A	N/A		474	2021 is the first year, Elisa is reporting this indicator.	Financial statement´s income tax of EUR 75 million has EUR 2 million negative change in deferred tax assets and liabilities, which is not included in the corporate tax in tax footprint.	Includes: Australia, Belgium, Canada, France, Hungary, Italy, Malaysia, Norway, Romania, Russia, Singapore, Taiwan, Great Britan and USA.
Estonia	N/A	N/A		40			
Sweden	N/A	N/A		8			
Spain	N/A	N/A		1			
Germany	N/A	N/A		4			
Other countries	N/A	N/A		4			

SASB Indicators

Competitive Behavior & Open Internet

Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations (TC-TL-520a.1)	Description	Data includes
Elisa reports significant legal consequences in Elisa's financial statements (Significant legal and regulatory issues, p.10)		

Average actual sustained download speed of (1) owned and commercially-associated content and (2) non-associated content (Mbps) (TC-TL-520a.2)

We do not disclose download speed.

Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices(TC-TL-520a.3)	Description	Data includes
Elisa operates in markets where data services are generally unlimited. Risks and opportunities of net neutrality, paid peer review and zero rating are not significant. However, 5G can bring new opportunities (e.g., network slicing and optimized services). We follow the instructions of the authorities in net neutrality issues related to productization.	Elisa reports this indicator in its own way.	

Sustainability-linked revolving credit facility indicators

	Description	Data includes
Increase of the share of female leadership positions [%]		
The target has been achieved. As of 31.12.2021, Elisa's share of female in leadership positions is 27%.	<p>This indicator is part of Sustainability Criteria of Elisa's Sustainability linked loan.</p> <p>2021 is the first year Elisa is reporting this indicator.</p>	Scope: Elisa Oyj, Elisa Videra Oy, Elisa Santa Monica Oy, Fenix Solutions Oy.
Decrease of the share of population without access to high speed connection [%]		
The target has been achieved. As of 31.12.2021 27.5% of the households are without the access to high speed connection.	<p>This indicator is part of Sustainability Criteria of Elisa's Sustainability linked loan.</p> <p>2021 is the first year Elisa is reporting this indicator.</p>	Scope: Elisa Finland
Ensure renewable energy sourcing, and commit into increasing share of PPA in renewables to increase the impact		
100% of electricity used in Elisa Finland is from renewables source covered through Certificate of Origins.	<p>This indicator is part of Sustainability Criteria of Elisa's Sustainability linked loan.</p> <p>2021 is the first year Elisa reports this indicator.</p>	Scope: Elisa Finland

Environmental sustainability

GRI Indicators

Whether and how the precautionary approach or principle is addressed by the organisation (102-11)

The precautionary principle has been taken into account in accordance with statutory requirements.

Energy

Energy consumption within the organisation [GJ] (302-1)

Direct energy consumption by primary energy source	2019	2020	2021	Description	Data includes
Usage of fossil fuels	9,363	9,946	9,148	Fossil fuels include gasoline, diesel, and burning oil.	Scope 2021 onwards: Elisa Finland and Elisa Estonia
Usage of renewable fuels	0	0	0	Relatively small amounts of biodiesel not yet disclosed.	
Total direct energy consumption	9,363	9,946	9,148		

Indirect energy consumption by primary sources	2019	2020	2021	Description	Data includes
Electricity	1,160,178	1,061,068	1,173,205		Scope: Elisa Corporation
Heating	51,797	38,628	46,224		Scope: Elisa Finland and Elisa Estonia
Cooling	41,589	42,598	42,087		Scope: Elisa Finland
Total indirect energy consumption	1,253,564	1,142,294	1,261,516		

Purchased renewable electricity	975,600	1,007,460	1,016,935	Purchased through certificates of origin (hydropower).	
Usage of renewable electricity	1,159,994	1,060,921	1,164,973	All consumption, including rented sites.	
Purchased renewable cooling	0	37,571	42,087	2021 onwards, all district cooling is renewable.	Scope: Elisa Finland
Sold energy (waste heat from datacenter)	N/A	N/A	18,966	2021 onwards, we report sold energy.	Scope: Elisa Finland

Total energy consumption within organization	1,262,927	1,152,240	1,251,698	Total energy is calculated as sum of direct and indirect energy minus sold energy.
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Energy intensity [kWh/GB] (302-3)	2019	2020	2021	Description	Data includes
Mobile networks electricity consumption per transferred gigabyte	0.15	0.12	0.11		Scope: Elisa Finland

Energy saved due to conservation and efficiency improvements [GJ] (302-4)	2019	2020	2021	Description	Data includes
Reuse of server generated heat	41,588	42,598	60,469		Scope: Elisa Finland
Energy efficiency in networks (electricity)	26,963	22,842	77,376	2019 figure has been retroactively revisited. 2021 onwards, the calculation methodology is improved.	Scope: Elisa Finland
Elisa Ideal work	16,621	N/A	N/A	2021 onwards, we report energy savings also from the fixed network. 2020 and 2021 reporting does not include energy savings from flexible work, to better correspond with the exceptional pandemic circumstances.	Scope: Elisa Finland
Total	85,172	65,440	137,845		

Water and Effluents

	2019	2020	2021	Description	Data includes
Water withdrawal [ML] (303-3)					
Municipal water	N/A	18	22	The biggest water related aspects in Elisa operations come from the offices, where it is assumed that the volume of water withdrawal, discharge and consumption is the same.	Scope: Elisa Finland and Elisa Estonia
Water discharge [ML] (303-4)					
Wastewater	N/A	18	22	We apply a level of granularity for water reporting that is relevant for Elisa, compiling information from our reporting system.	Scope: Elisa Finland and Elisa Estonia
Water consumption [ML] (303-5)					
Water intake	N/A	18	22		Scope: Elisa Finland and Elisa Estonia

Emissions

Total direct and indirect greenhouse gas (GHG) emissions by weight [tCO₂e, tonnes of carbon dioxide equivalents] (305-1 and 305-2)

	2019	2020	2021	Description	Data includes
Scope 1, Direct greenhouse gas emissions	650	666	597	Emission compensation since 2020.	Scope: Elisa Finland and Elisa Estonia
Scope 2, Indirect greenhouse gas emissions, market-based	4,310	1,666	2,444	Emission compensation since 2020. 100% renewable electricity used in Elisa Finland and Elisa Estonia, in Elisa Finland additionally 100% renewable district cooling.	Scope: Elisa Corporation
Scope 2, Indirect greenhouse gas emissions, location-based	71,340	59,760	53,588		Scope: Elisa Corporation

Other relevant indirect greenhouse gas emissions by weight [tCO₂e] (305-3)

Sources of indirect Scope 3 emissions

	2019	2020	2021	Description	Data includes
Purchased good and services	96,147	120,451	110,384	Historical data has been revisited with updated emission factors.	Scope 2021 onwards: Elisa Finland and Elisa Estonia
Capital goods	39,901	33,911	38,272	Purchased base stations and other network equipment.	Scope: Elisa Finland and Elisa Videra
Fuel-and energy-related activities	12,753	14,044	22,940	Historical data has been revisited with improved methodology.	
Upstream transportation and distribution	209	165	246	Transportation of goods to Elisa and to Elisa's customers.	Scope 2021 onwards: Elisa Finland and Elisa Estonia
Waste generated in operations	371	590	425	Emission compensation since 2020.	Scope 2021 onwards: Elisa Finland, Elisa Estonia and Elisa Polystar

Business travel	2,659	1,498	406	Emission compensation since 2020.	Scope: Elisa Finland, Elisa Estonia, Elisa Santa Monica Oy, Elisa Videra Oy, Enia Oy, Fenix Solutions Oy, Fonum Oy and Kepit Systems Oy
Employee commuting	2,180	1,369	1,736	Emission compensation since 2020. Historical data has been revisited with improved methodology.	Scope: Elisa Corporation
Upstream leased assets	N/A	N/A	N/A	Energy consumption in rented sites is calculated in Scope 2.	
Upstream transportation	N/A	N/A	N/A	Not relevant, Elisa does not sell transportation services.	
Processing of sold product	N/A	N/A	N/A	Not relevant, no processing of products.	
Use of sold product	16,534	25,173	28,959	Historical data has been revisited with updated emission factors.	Scope: Elisa Finland and Elisa Estonia.
End-of-life treatment of sold products	655	906	1,032	Historical data has been revisited with updated emission factors.	Scope: Elisa Finland and Elisa Estonia
Downstream leased assets	N/A	N/A	N/A	Energy consumption of operators with leases is calculated in Scope 2 (Elisa purchases 100 % renewable electricity).	
Franchises	N/A	N/A	N/A	Not relevant: no franchises.	
Investment	N/A	N/A	N/A	Not relevant: no significant credit management, production investments reported elsewhere.	
Total	171,409	198,107	204,400		

GHG emissions intensity [kgCO ₂ e/EUR] (305-4)	2019	2020	2021	Description	Data includes
Scope 1 and Scope 2 emissions per revenue	0.003	0.001	0.002		

Reduction of GHG emissions [tCO ₂ e] (305-5)	2019	2020	2021	Description	Data includes
Emission reductions in own operations					
Emission reduction in networks, Scope 2	2,170	1,582	5,025	2019 figure has been retroactively revisited. 2021 onwards, the calculation methodology is improved. 2021 onwards, we report emission reductions also from the fixed network.	Scope: Elisa Finland
Use of acquired renewable energy, Scope 2	112,151	91,240	88,141	We report emission reductions from all the use of acquired renewable energy.	Scope: Elisa Finland and Elisa Estonia
Reuse of capital infrastructure, Scope 3	N/A	N/A	704	2021 onwards, we report emission reduction from the reuse of network equipment.	Scope: Elisa Finland
Emission compensation	N/A	6,750	6,450	Compensation boundaries have been retroactively expanded 2020 onwards, including remote work, and from 2021 onwards also business specific compensation commitments.	
Elisa Ideal Work (flexible work solutions), Scope 3	6,084	N/A	N/A	2020 and 2021 reporting does not include emission reduction from flexible work, to better correspond with the exceptional pandemic circumstances.	
Total	120,405	99,572	100,319		

Waste

Waste generated [t] (306-3)	2019	2020	2021	Description	Data includes
Total waste generated	1,014	1,009	645		Scope 2021 onwards: Elisa Finland, Elisa Estonia and Elisa Polystar
Hazardous waste	242	401	293		
Non-hazardous waste	772	608	352		
WEEE (Waste Electrical and Electronic Equipment)	303	321	145		
Waste diverted from disposal by recovery operation [t] (306-4)				All waste diverted from disposal are recovered offsite.	
Total hazardous waste	218	364	262		
Recycling	218	364	262		
Total non-hazardous waste	772	608	351		
Recycling	772	608	351		
Composting	0	0	0.12		
Waste prevented	989	972	613		
Waste directed to disposal by disposal operation [t] (306-5)				All waste is disposed offsite.	
Total hazardous waste	24	37	31		
Hazardous waste disposal	24	37	31		
Total non-hazardous waste	0	0	1		
Incineration(with energy recovery)	0	0	1		

Environmental compliance

Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations (307-1)

No non-compliances incidence in 2021.

SASB Indicators

Environmental footprint of operations (TC-TL-130a.1)	2019	2020	2021	Description	Data includes
Total energy consumed [GJ]	1,262,927	1,152,240	1,251,698	Only energy directly consumed by the entity during the reporting period.	Scope: Elisa Corporation
Percentage grid electricity [%]	92%	92%	94%	Includes renewable electricity and cooling. 2021 onwards, we include PUE data from the 10 biggest data centres of Elisa Finland.	Scope: Elisa Corporation
Percentage renewable [%]	92%	95%	95%		Scope: Elisa Finland and Elisa Estonia
PUE (Power Usage Effectiveness), 12 month average weighted figure	N/A	1.6	1.4		Scope: Elisa Finland
Product End-of life Management (TC-TL-440a.1)	2019	2020	2021	Description	Data includes
Materials recovered through take back programs [t]	N/A	321	120	2020 figure has been retroactively revisited.	Scope: Elisa Finland and Fonum Oy
Percentage reused [%]	N/A	0%	4%		Scope: Elisa Finland and Fonum Oy
Percentage recycled [%]	N/A	100%	96%		Scope: Elisa Finland and Fonum Oy
Percentage landfilled [%]	N/A	0%	0%		Scope: Elisa Finland and Fonum Oy

Own indicators

Science Based Target (SBTi) performance	2021	Description	Data includes
T1 (Scope 1 and Scope 2)	On target		Scope: Elisa Corporation
Ensure renewable energy sourcing, and commit into increasing share of PPAs in renewables to increase the impact			
100% of electricity used in Elisa Finland is from renewables source covered through Certificate of Origins.		<p>This indicator is part of Sustainability Criteria of Elisa's Sustainability linked loan.</p> <p>2021 is the first year Elisa reports this indicator.</p>	Scope: Elisa Finland