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# Vincit Sustainability Report 2025

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# 1. Sustainability highlights

2025 was a year of repairing our foundations and getting serious about our footprint. We spent the year building a clearer, more structured roadmap for our sustainability journey. From completing our first EcoVadis assessment and committing to the Science Based Targets initiative (SBTi) to launching our updated Code of Conduct, these highlights show the concrete steps we're taking to be more transparent about how we build Better Mondays.

# 1.1. Sustainability highlights of 2025

## General milestones



Completed our first **EcoVadis** assessment



Developed and implemented the **Vincit Code of Conduct**



Adopted a three-year **Sustainability roadmap** at the Leadership Team level

## Better Mondays for people



Published the **FeelGood Strategy for 2025–2028** to support employee well-being



Announced the **Rising Star** program to invest in future talent and contribute to society



Supported **548 Vincitizens** working across five different countries



Invested in Vincitizens growth with at least **48 hours** to competence development per person

## Better Mondays for the planet

Carried out our baseline Greenhouse Gas (GHG) calculation:



Total emissions (market based): **2,326 tCO<sub>2</sub>eq**



Total emissions (market based): **33.7 tCO<sub>2</sub>eq/MEUR**

## 1.2. Greetings from our CEO

2025 was a year of repairing our foundations. We implemented heavy but necessary restructuring measures to reduce our cost structure and streamline our organization, and focused on our long-term goals, not forgetting sustainability. Despite trying times we faced in 2025, Vincit strengthened its commitment to ensure social, economic, digital, and environmental responsibility to create Better Mondays for us all.

We conducted the first materiality assessment in accordance with the ESRS standards already in 2024. Based on the identified material topics, we created a clearer baseline for sustainability for both us and our partners by introducing a Code of Conduct. To focus our efforts where they matter the most, we clarified our sustainability responsibilities and created a three-year roadmap. This roadmap includes actions such as regular public sustainability reporting and more structured carbon management.

### Better Mondays

Vincit was created for Better Mondays and that tells what sustainability means to us. We foster a people-centric culture and promote the wellbeing of all Vincitizens. We help our customers develop their business through digitalization by creating solutions that are safe, accessible, and easy to use. At the core of our operations, we focus on digital services that have a long and productive lifespan. In 2025, we also launched Green Software Fundamental training to help Vincitizens learn eco-friendly coding practices.

During the year, the determined execution of our strategy started to pay off. Vincit is now recognized as a credible partner in increasingly business-critical projects. This is something we want to hold on to. At the same time, awareness and expectations around sustainability are increasing among legislators and other stakeholders. Because of this, we

have put emphasis on reorganizing our sustainability efforts this year. We aim to offer more visibility into what we do and how we do it, while preparing for potential future compliance. Simultaneously, enhancing our sustainable practices improves our resource management. As the year 2025 came to a close, we also committed to SBTi to do our part in building a more sustainable future.

### Looking ahead

People have been at the core of Vincit since the very beginning, whether we talk about Vincitizens, customers or other stakeholders. Despite our restructuring measures, we will not stop our investments in future expertise. In December, we announced the Rising Star program, aimed at cultivating early-career IT talent into top professionals for the AI era. We also continue to invest in the development of our commercial expertise and project management capabilities.

The sustainability roadmap created during 2025 includes clear steps to:

- develop a clear management system and strategy for developing a more sustainable business and to consider the material topics,
- develop annual sustainability reporting that meets European standards and leads to better EcoVadis-results, and
- set climate targets in accordance with the SBTi commitment and create of a transition plan.

I would like to thank our customers and partners for their trust in a challenging market. A special acknowledgement goes to every Vincitizen — the past year has demanded flexibility, resilience in the face of uncertainty, and persistent hard work.

Julius Manni, CEO

## 2. General information

At the heart of Vincit are our people, their deep expertise, and the close partnerships we build with our customers. By combining these human inputs with future-proof technology, we create digital services and SaaS products that help our customers transform into better versions of themselves. To ensure we focus our efforts where they count most, we use a double materiality approach, focusing our energy where we can have the greatest impact. This entire journey is guided by our governance structure, a system of shared responsibility and transparent reporting designed to keep us all on the right track.

## 2.1. Business and strategy



### Business model

Vincit's business consists of two main areas: our service business and our product business. Our service business has operations in Finland, Sweden, and the USA, supported by our talent hubs in Poland and Portugal. Our product business offers a SaaS solution for managing materials, maintenance, and services for companies and public sector operators in Finland.

The turnover of the service business in 2025 was MEUR 65.3 (81.5), which accounts for about 95% of our total revenue. Our product business turnover in 2025 was MEUR 3.8 (3.1).

### Service Business

We serve clients across a wide range of industries: wholesale and retail, manufacturing, energy and utilities, consumer brands, banking and insurance, and medical devices manufacturing. In addition to the private sector, the public sector is also an important client for us.

We are a strategic partner for our customers' business-critical processes and systems. Our offering spans the development, commercialization, and ongoing maintenance of digital services and solutions, extending our projects deeper into our clients' business processes. This helps us build long-term, continuous relationships.

Our competitive advantage is in bringing together design and human-centric thinking with deep business process knowledge and agile software development. We are focusing our growth on SAP and Microsoft Azure cloud ecosystems, as well as embedding AI capabilities across organizations.

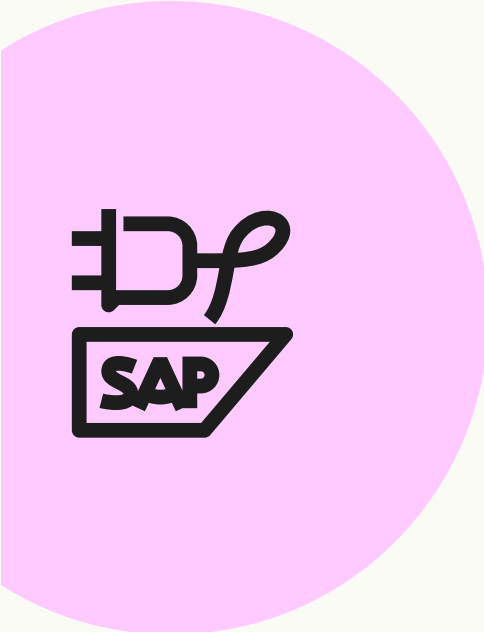
**Our four service areas are:**

**Data & AI:**



We harness data to enable smarter decision-making and foster business-wide AI adoption

**SAP Solutions & Core Processes:**



We create a competitive edge by streamlining core business processes with SAP solutions and integrated applications

**Composable Commerce:**



We drive growth and customer experience by developing modular sales channels and sustainable commercial concepts

**Digital Products & Services:**



We deliver tailored digital products and dedicated development teams to fit diverse business needs

### **What fuels our work: Our main inputs**

- Highly skilled professionals and their expertise
- Customer knowledge and close collaboration with clients
- Digital platforms, cloud infrastructure, and development tools
- Partner ecosystems, including technology and delivery partners

Because people, knowledge, and data are at the heart of what we do, employee wellbeing, competence development, and responsible data use are our most critical sustainability topics.

### **What we create: Our main outputs**

- Digital services and solutions that support customers' core business processes
- Long-term improvements in operational efficiency, scalability, and resilience for our customers
- SaaS products that make asset, maintenance, and service management more efficient

We shape how digital systems are built, maintained, and used through our services, which directly connects our work to the social and environmental impact across our customers' value chains.

### **Our sustainability-related targets and strategic focus**

During this strategic period, we are emphasizing growth and being a Good Company through:

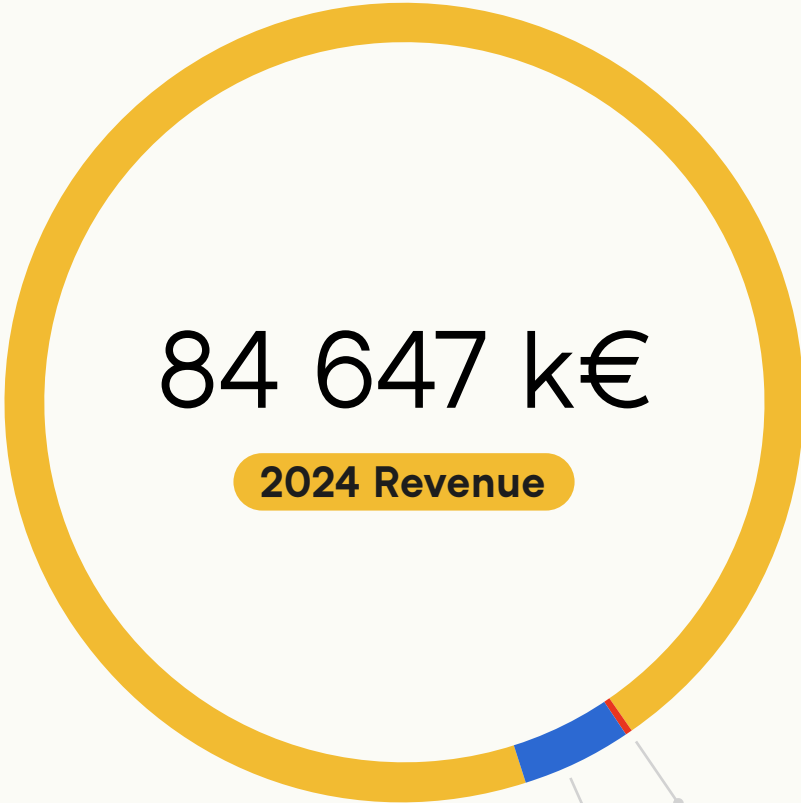
- Prioritizing long-term customer relationships over short-term projects
- Building scalable, cloud-based, and data-driven solutions
- Committing to responsible governance, transparency, and people-centric practices

By aligning our strategy, business model, and sustainability objectives, we aim to manage risks proactively and grab opportunities related to digitalization, AI adoption, and the growing importance of responsible business practices.

# 2.2. Financial figures in a nutshell



-1 287 k€ (1,9 %)  
EBIT  
2 768 k€ (4,0 %)  
EBITDA



-288 k€ (0,3 %)  
EBIT  
3 837 k€ (4,5 %)  
EBITDA

# 2.3. Governance structure and composition

This graph shows our governance bodies and how they take responsibility for our sustainability goals. The arrows show how we monitor our work and report our progress to keep us all on the right track.



## 2.4. Our sustainability approach

During 2024, we conducted a double materiality assessment following the ESRS standards. This process helped us identify our material impacts, risks, and opportunities (IROs). They are listed in the table below together with their position in the value chain. While we didn't identify any major environmental IROs in our 2024 assessment, we have included climate data in this report because it is important to us and many of our stakeholders, including our customers.

| Material sustainability topics | Material IROs  | Location in the value chain: |               |            |
|--------------------------------|--|------------------------------|---------------|------------|
|                                |  | Upstream                     | Own Operation | Downstream |
| <b>Vincit employees</b>        |  |                              |               |            |
| Impacts                        | <ul style="list-style-type: none"> <li>Risk related to workload in expert roles</li> <li>Flexibility through local agreements and support for entrepreneurship</li> </ul>  |                              | ●             |            |
| Risks                          | <ul style="list-style-type: none"> <li>Retention risk</li> </ul>   |                              | ●             |            |
| Opportunities                  | <ul style="list-style-type: none"> <li>Opportunity for local agreements</li> <li>Equal treatment practices create opportunities for higher employee engagement</li> </ul>  |                              | ●             |            |
| <b>Consumers and End-users</b> |  |                              |               |            |
| Impacts                        | <ul style="list-style-type: none"> <li>Risk related to end-user data security, but risks also always exist regarding client companies' data security</li> <li>The choice of subcontractors impacts the end product and its data security</li> </ul>                            | ●                            | ●             | ●          |
| Risks                          | <ul style="list-style-type: none"> <li>Realization of data security risks through Vincit employees, processes, or systems to the external environment would be significant from both brand and customer relationship growth perspectives</li> </ul>                            |                              | ●             | ●          |
| Opportunities                  | <ul style="list-style-type: none"> <li>Capability to build inclusive and secure products</li> </ul>  |                              | ●             |            |
| <b>Good Governance</b>         |  |                              |               |            |
| Impacts                        | <ul style="list-style-type: none"> <li>Opportunity to strengthen the trust of personnel and customers when misconduct prevention and handling are carried out transparently and through secure processes</li> </ul>  |                              | ●             | ●          |
| Risks                          | <ul style="list-style-type: none"> <li>Failure to comply with ethical business principles, shortcomings in implementation, or inadequate risk identification would negatively impact reputation</li> <li>Risk of embezzlement if payment practices are too flexible</li> </ul> |                              | ●             | ●          |
| Opportunities                  | <ul style="list-style-type: none"> <li>Capability to build inclusive and secure products</li> </ul>  |                              | ●             |            |

## How we did the heavy lifting

Here comes the mandatory heavy stuff about how we did the assessment:

- **Internal workshops.** We gathered together Vincitizens with a deep understanding of our operations, business model, support functions, and the risks and opportunities in their management at Vincit.
- **Stakeholder survey,** open to all stakeholder groups. We opened a web-based survey to everyone from our partners to the public via Vincit Group's investor site and [inderes.fi](https://inderes.fi). Identified stakeholders were also directly invited to take the survey.
- **Official standards.** Our materiality assessment work was guided by the EU Corporate Sustainability Reporting Directive (CSRD) and its reporting standards (ESRS) although this report hasn't been assured yet (officially verified by a third party). We also identified and assessed our industry-specific environmental, social, and governance (ESG) trends and priority areas in our internal workshops. The most significant IROs were documented by topic and are described later in this document.
- **Research & megetrends.** In our desk research and workshops, we utilized background research on global risks and megatrends to evaluate the different material topics' significance and impact. We compared our business model, size, and the countries where we operate against research data, including analyses of relative emission levels, industry-specific human rights risks related to working life, and equality studies.
- **Trusted sources.** Our research sources included, among others, the World Economic Forum's Global Risks Reports, the IPCC Sixth Assessment Report, the WEF Global Gender Gap Report, and UN-EP's human rights toolkit. References and data sources are cited in connection with the assessment of each sustainability theme.

Our assessment is based on the double materiality perspective, taking into account both how events that affect Vincit and Vincit's impact on those events. We examined both the financial effects and Vincit's societal impacts for each topic. Impacts and sub-areas often overlap, and we took efforts to avoid double-counting.

We defined our impacts, risks, and opportunities using the ESRS standards' topic categorization, and scored and aggregated all IROs by topic. Because many of our impacts, risks, and opportunities are so overlapping and interlinked, we found that looking at them by topic gave us the clearest view.

We assessed materiality through financial thresholds, impact thresholds, and stakeholder expectations. The materiality analysis covered our own operations, and with regard to the value chain, we assessed materiality both from products/services and customers' perspective, and the subcontracting chain's perspective.

We set our financial materiality threshold at a level where exceeding it (through costs or revenue growth) would make our equity analyst trigger a need to reassess Vincit's financial outlook. We consulted Inderes' equity analyst to make sure our bar was as realistic as possible. We determine this financial threshold separately on an annual basis, and the presentation below is purely consultative.

The financial threshold for 2024 was €500,000, taking into account our low level of indebtedness and strong cash position, meaning that, for example, the impact of sanctions on earnings would be more moderate than for a company in a different financial position.

The impact materiality threshold is exceeded if both the impact's scale and scope are at least level 2, or if the impact is irremediable. To exceed either the financial or impact threshold in the future, the risk or opportunity must be more likely than unlikely, and both scale and scope must be at level 2. We always make an exception for any situation where there is a possibility of a human rights violation that cannot be undone.

## Scope

1. The impact affects a small group of people (relative to the size of the company) or has a local impact on the local environment.
2. The impact affects a broader group of people or a community, or alternatively has a regional environmental impact.
3. The impact is global or multi-regional, affecting large populations and groups of people.

## Scale

1. The impact, whether negative or positive, is short-term and temporary in nature.
2. The impact is moderate in scale, although still temporary in nature. In the case of negative impacts, remediation requires investments or specific programs. In the case of positive impacts, the beneficiaries gain long-term benefits from the impact.
3. The impact is significant, either positive or negative. Large numbers of people, extensive natural areas, or broader communities may benefit from the impact or, alternatively, be subject to negative consequences. The impact is long-term in nature. In the case of positive impacts, operations must be clearly adapted and inefficiencies reduced, or the standard of living/conditions of a large group or the state of the environment must be improved.

## Financial Impact and Threshold

€500k, taking into account Vincit's low level of indebtedness and strong cash position, meaning that, for example, the impact of sanctions on earnings is more moderate than for a company in a different financial position.

## 2.5. Reporting principles – The ‘how’ behind our data



We have prepared this sustainability report free-formatted, but we’ve drawn our inspiration from the European Sustainability Reporting Standards (ESRS). We carried out our first double materiality analysis (DMA) in 2024, and it included the entire Vincit Plc and our entire value chain. The contents of this report are in line with the 2024 identified material topics and cover the value chain as we defined in the “Our sustainability approach” chapter. In addition, we have included climate in this report to be transparent about our emissions and climate commitments.

This report covers Vincit Plc and its subsidiaries for the fiscal period from January 1 to December 31, 2025. This is the same scope we used for our 2025 Financial Statement. We have used the specific timeframes defined by the ESRS in both our double materiality analysis and this report. The biggest uncertainties and majority of estimates relate to climate data, and we have explained these in the “Emissions and energy” chapter.

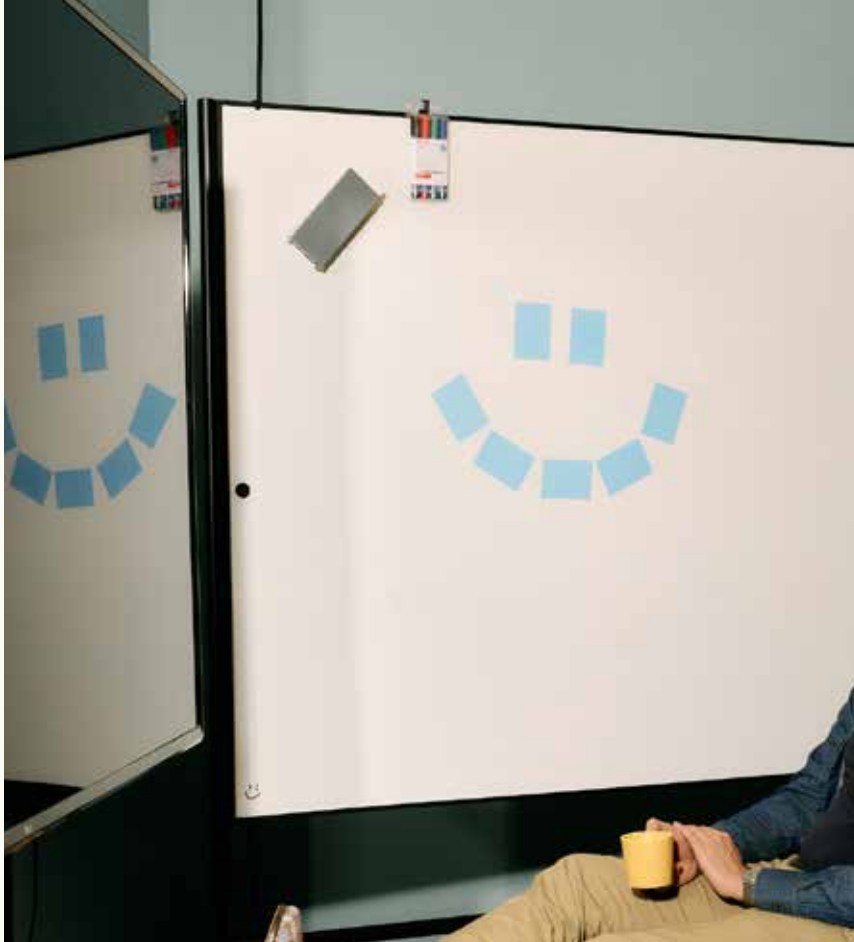
A lot has changed between this report and the last sustainability report we have published, including the reporting framework we use. This is the first time we have used ESRS as inspiration and this report will serve as a baseline for the reports to come.

We also completed our first EcoVadis assessment in 2025 and received a Committed badge. From this year forward, we are publishing the Vincit Sustainability Report once a year and continue the EcoVadis assessment annually. We have found that these two frameworks don’t just increase transparency, but also support each other and help us manage sustainability in a more structured way.

# 3. Better Mondays for our planet

We believe that you can't manage what you don't measure, so we ensure our climate actions are backed by data, not just good intentions. By combining our baseline emission tracking with a commitment to science-based targets, we are taking concrete steps to minimize our environmental footprint while helping our customers do the same.

## Do you care about leaving the world better than we found it? We do.



At Vincit, creating Better Mondays for our planet means taking action on our climate. During 2025, we decided to follow our carbon footprint annually and to commit to the Science Based Targets initiative (SBTi). This means we will set our science-based climate targets during the following year to meet the growing needs of our customers. Our goal is to make sustainability a genuine driver in our decision-making and strategic actions, not just a box we check.

We are doing this by:

- Measuring our carbon footprint annually using the GHG Protocol to keep our data accurate and transparent
- Looking into setting emissions reduction targets aligned with the SBTi
- Using independent assessments like EcoVadis to track our progress and identify where we can improve
- Publishing annual sustainability reports

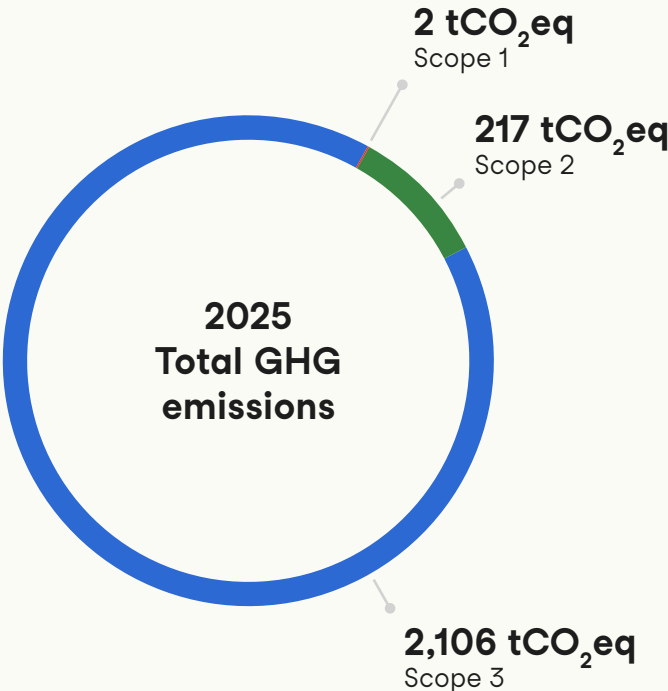
Our commitments to the environment, including climate, energy and smart use of resources, are stated in the Vincit Code of Conduct presented in [chapter 5](#). We want to leave things a little better than we found them and always be a Good Company. That's why we try to also contribute to creating Better Mondays for our planet.

# 3.1. Emissions and energy – How we track our footprint

## Emissions 2025:

We calculated our carbon footprint for the 2025 fiscal year together with an external sustainability consultant. The calculation covers all operations in Finland and selected international operations (procurement and Scope 2), which represent our most significant sources of emissions.

At the start of the project, we identified relevant emission sources following the GHG Protocol’s operational control approach. We made this calculation as thorough as possible to provide a reliable baseline for our SBTi targets.



| GHG emissions (tCO <sub>2</sub> eq)         | 2025         |
|---|--------------|
| <b>Scope 1</b>                              | <b>2</b>     |
| <b>Scope 2</b>                              | <b>217</b>   |
| Location based                              | 131          |
| Market based                                | 217          |
| <b>Scope 3</b>                              | <b>2,106</b> |
| 1. Purchased goods and services             | 1,687        |
| 2. Capital Goods                            | N/A          |
| 3. Fuel and energy related activities       | 55           |
| 4. Upstream transportation and distribution | 1            |
| 5. Waste generated in operations            | 3            |
| 6. Business travelling                      | 155          |
| 7. Employee commuting                       | 205          |
| 8. Upstream Leased Assets                   | N/A          |
| 9. Downstream transportation                | N/A          |
| 10. Processing of Sold Products             | N/A          |
| 11. Use of Sold Products                    | N/A          |
| 12. End-of-Life Treatment of Sold Products  | N/A          |
| 13. Downstream Leased Assets                | N/A          |
| 14. Franchises                              | N/A          |
| 15. Investments                             | N/A          |
| <b>Total GHG emissions, location based</b>  | <b>2,240</b> |
| <b>Total GHG emissions, market based</b>    | <b>2,326</b> |

To calculate the emission intensity, we used the consolidated revenue presented in our Financial Statements.

| <b>GHG intensity (tCO<sub>2</sub>eq/MEUR)</b>  | <b>2025</b> |
|--|-------------|
| Intensity Scope 1-2 (location based)           | 1.9         |
| Intensity Scope 1-2 (market based)             | 0.6         |
| Intensity Scope 3                              | 30.5        |
| Total GHG emissions intensity (location based) | 32.4        |
| Total GHG emissions intensity (market based)   | 33.7        |

### Energy 2025:

The energy consumption presented in this table includes all energy accounted for in the Scope 2 GHG calculation. When the actual consumption data was not available, we used an estimation of our energy consumption, based on the floor area for 62.4% of our premises. For the 37.6% of premises with actual consumption data, we know the sources of energy. The rest of the energy consumed is mixed energy, and we have used Finnish Energy statistics to estimate the energy sources.

**5.6%**

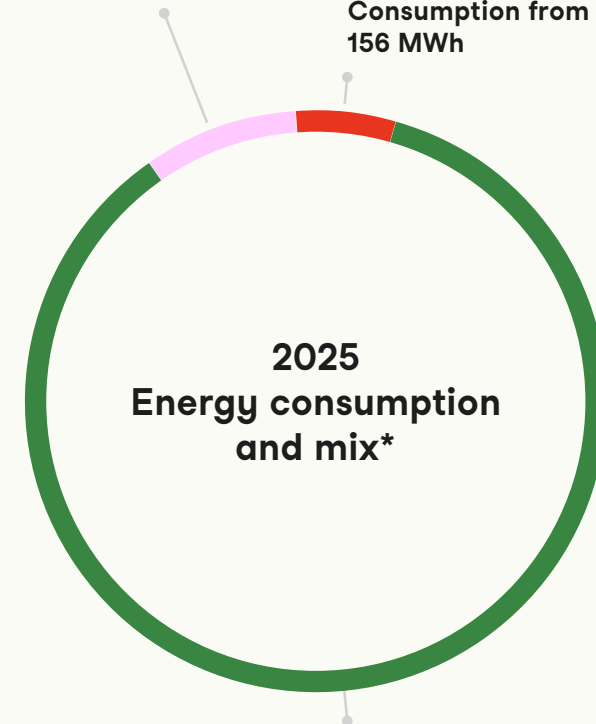
Share of fossil sources in total energy consumption

**Total fossil energy consumption  
99 MWh**

**8.7%**

Share of consumption from nuclear sources in total energy consumption

**Consumption from nuclear sources  
156 MWh**



**85.7%**

Share of renewable sources in total energy consumption

**Total renewable energy consumption  
1,533 MWh**

## Scope 1

Our scope 1 emissions amounted to 2.46 tCO<sub>2</sub>e (less than 1% of total emissions). Most of these emissions come from a van owned by Vincit, with the rest coming from leased vehicles. We primarily based this calculation on actual mileage data and emission data provided by suppliers.

## Scope 2

Our market-based Scope 2 emissions amounted to 222.1 tCO<sub>2</sub>e (6.5% of total emissions), while location-based emissions were 135.14 tCO<sub>2</sub>e. We have actual consumption data and energy certificates for 37.6% of these emissions. For the remaining premises, we estimated energy use based on floor area.

## Scope 3

Scope 3 accounts for the majority of Vincit's total emissions (approximately 93%). The most significant sources of emissions were purchased goods and services (87%), employee commuting (6%), and business travel (5%).

Primary supplier-specific emissions data accounts for approximately 1.1% of Scope 3 emissions. We calculated the remaining data using a spend-based approach based on general emission factors.

Travel-related emissions are our second-largest source of emissions after purchased goods and services. Business travel emissions amount to approximately 155 tCO<sub>2</sub>e, with the majority coming from air travel (89.80 tCO<sub>2</sub>e) and the remainder from car travel (42.48 tCO<sub>2</sub>e).

Employee commuting emissions amount to 204.69 tCO<sub>2</sub>e, with the most significant emissions in this category originating from car travel.

### How we defined our scope

During this process, we made a few key decisions regarding what to include in our calculations.

- We decided to exclude employee pension insurances because we don't have the ability to influence those emissions, and other operators in our field seemed to have made the same choice.
- We also excluded freelancers from the calculation because they do the exact same work in the same way as Vincitizens.
- We excluded certain Scope 3 categories if they were not relevant to our business, if the emissions were expected to be negligible, if data was unavailable, or if including them would have required disproportionate additional analysis.

## Emission factors used in the calculation

| Category                                    | Main emission factors used  |
|---|---|
| <b>Scope 2</b>                              |   |
| Electricity                                 | We used emission factors from Association of Issuing Bodies (AIB) via the Carbon+Alt+Delete emission factor database. For our operations in California, we applied emission factors from the International Energy Agency (IEA). These factors are updated automatically.  |
| Heating                                     | We used direct emission factors from Paikallisvoima or other energy providers where available. We also took lifecycle emissions related to fuel transport and processing into account. We obtained the required data mainly from DEFRA district heating emission factors. |
| <b>Scope 3</b>                              |   |
| 1. Purchased goods and services             | We primarily calculated emissions using a spend-based (€) approach, and applied Exiobase emission factors. Some exceptions were identified by the service provider.   |
| 3. Fuel- and energy-related activities      | We calculated emissions related to purchased energy transmission losses and emissions from energy production and distribution, based on the Scope 2 calculation. We used emission factors from AIB and IEA.   |
| 4. Upstream transportation and distribution | Our logistics costs are relatively small and we therefore included them using a spend-based (€) approach. We applied Exiobase emission factors.   |
| 6. Business travel                          | We calculated emissions using both spend-based (€) and distance-based data. These emissions include flights, taxis, hotel stays, mileage reimbursements, and public transport. We applied emission factors from Exiobase and DEFRA.                                       |
| 7. Employee commuting                       | We conducted an employee commuting survey (n=243) and scaled the results to cover our entire workforce (FTE=506). We used emission factors from DEFRA, Helsinki Region Transport (HSL), and Statistics Finland.   |

# 4. **Better Mondays for our society**

We believe that Better Mondays help build a stronger and more sustainable society. As an IT company with deep Finnish roots and a global reach across five countries, we are committed to acting responsibly. Our foundation is built on a solid value base centered on equality, trust, and equal opportunities. We take an active role in society, contributing through open dialogue as well as concrete actions. These include creating meaningful jobs, supporting long-term growth, and promoting Nordic values both across Europe and beyond. Through initiatives such as our Rising Star program, we invest in future talent. We offer people at the early stages of their careers the opportunity to develop into skilled IT professionals. In doing so, we aim to make a positive and lasting contribution to society.

## 4.1. Stakeholder engagement – How we make sure everyone is heard

We've prioritized our stakeholders based on their potential influence on us and our business, as well as our potential influence on them. The goal of stakeholder engagement is to understand exactly what our stakeholders' expect from us, our business, and our sustainability work. We believe that if people don't thrive, the business cannot thrive either.



### **Our most important stakeholders are:**

- Our people (also known as Vincitizens)
- Customers
- Shareholders

### **Other important stakeholders are:**

- Partners and subcontractors
- Media
- Authorities
- Industry associations

We are actively engaging with all our important stakeholders. The table below represents the more detailed topics and types of engagement with our most important stakeholder groups.

| Stakeholders | Topics for engagement   | Types of engagement  |
|--------------|---|--|
| Employees    | <ul style="list-style-type: none"> <li>• Employee experience and wellbeing</li> <li>• Equality, equity, and belonging</li> <li>• Competence development</li> <li>• Local bargaining</li> <li>• Workplace development</li> <li>• Internal development</li> <li>• Co-developing our business</li> <li>• Innovation and problem-solving</li> <li>• Strategy and future growth</li> <li>• Sustainability and our impact</li> <li>• Occupational health and safety</li> <li>• Fair pay and working conditions</li> </ul> | <ul style="list-style-type: none"> <li>• Open and private Slack channels for daily communication</li> <li>• Weekly, biweekly, or monthly team meetings</li> <li>• Monthly meetings for local communities and Business Areas</li> <li>• Structured and regular employee pulse surveys</li> <li>• Wellbeing surveys for customer project teams</li> <li>• Regular 1-to-1 discussions and growth discussions between each employee and their supervisor</li> <li>• Regular interaction with employee representatives, and occupational health and safety representatives and statutory workplace surveys</li> <li>• Annual Salary weeks</li> <li>• Employee Net Promoter Score survey</li> <li>• Biannual Equality and Equity survey</li> <li>• Regular wellbeing surveys conducted by our occupational healthcare partners</li> <li>• We also measure the diversity and equality in our recruitment through a voluntary survey at the end of the recruitment process</li> <li>• Employee representative forums like the Radar group and workshops</li> </ul> |
| Customers    | <ul style="list-style-type: none"> <li>• Business impact &amp; ROI: Aligning digital solutions with our customers' financial and operational goals.</li> <li>• End-user experience: Understanding how digital products affect the daily lives of users</li> <li>• Technological transformation: Transitioning to Public Cloud and integrating AI capabilities.</li> <li>• Future roadmapping: Discussing upcoming market trends (Composable Commerce, AI-driven development)</li> </ul>                             | <ul style="list-style-type: none"> <li>• Steering group meetings: Regular strategic sessions with business area (BA) leads and account executives</li> <li>• User research &amp; testing: Usability studies, interviews, and prototyping with the actual end-users of the solution</li> <li>• Co-creation workshops: Technical deep-dives and "GROW with SAP" discovery sessions to map the transformation journey</li> <li>• NPS &amp; CSAT surveys: Semiannual customer satisfaction surveys and continuous feedback loops.</li> <li>• Thought leadership events</li> </ul>  |
| Shareholders | <ul style="list-style-type: none"> <li>• Long-term value creation</li> <li>• ESG perspectives</li> </ul>  | <ul style="list-style-type: none"> <li>• Ongoing dialogue with investors and analysts through multiple channels</li> <li>• Annual General Meeting</li> <li>• Selected investor and industry events</li> <li>• Structured engagement by external partner</li> <li>• Vincit's company releases and press releases via our investor website</li> </ul>  |



## Shaping our future together

We continuously work to build a better Vincit together with our employees and pay close attention to their opinions.

We call our expert teams cells. Each cell has a cell lead (supervisor) and several other extraordinary talents who work with similar things. Cells are tight-knit groups of people who check-in with each other regularly.

We're making sure that employee interests and perspectives are considered in the strategic decision making through The Radar Group. It is a forum where employee representatives from our different communities come together with the Leadership Team and People and Business support experts.

The group has monthly meetings and a Slack channel to discuss our culture, recent phenomena, internal communications, and upcoming changes. The Radar Group is not a decision-making body, but a decision-shaping one. The insights and feedback discussed in the Radar Group carry over directly to the Leadership Team and other key forums, and are treated as anonymous input.

In 2025, the topics discussed in Radar Group included, for example, communication related to Vincit's salary processes, employment terms, and security incidents; Pulse survey results and action plans; wellbeing, sick leaves, and psychological safety; internal campaigns and external partnerships; and office vibes.

## 4.2. Better Mondays for our people

Do you believe that happy employees create the best results? We do.

Vincit was founded on the idea of creating Better Mondays. We believe that taking care of our people makes them happy, and happy employees lead to happy customers. Our culture isn't a project; it's the very essence of who we are and the bedrock upon which we build Better Mondays. At Vincit, we are all mood leaders, encouraged to use both our heads and hearts. We believe that when you create communities and spaces where people feel safe to be their authentic selves, extraordinary things happen.

Our commitments and relevant third-party frameworks related to our employees are stated in the Vincit Code of Conduct presented in [chapter 5](#). The Code of Conduct explains how Better Mondays are built, what it means to be part of Vincit, and how we do our work. We think that being a Good Company means creating an environment where everyone feels they belong and can do their best.

This is how we've defined it in our Code of Conduct:

- **Everyone is welcome:** We are committed to equality and providing a workplace free from discrimination. Your background, gender, age, beliefs, or who you love don't matter here—your skills and your character do.
- **Zero tolerance for harassment:** We do not tolerate any form of harassment, bullying, or disrespectful behavior. Period.
- **Speak up:** We encourage an open and supportive atmosphere where it's safe to voice concerns. If you experience or witness bad behaviour, discrimination, or bullying, please contact your supervisor, People organization, or occupational safety representative. All reports will be handled confidentially. We have zero tolerance for retaliation.

Our Code of Conduct also reflects our commitment to continuously improving our practices regarding occupational health and safety. In the digital world, the biggest threat to the wellbeing of our people isn't physical injury; it's the mental load. Our culture is our most important tool for managing and preventing it. Our Code of Conduct states that employee wellbeing matters more than any deadline. Vincitizens are the experts and decision-makers regarding their own balance and wellbeing. Taking action is everyone's responsibility; if a better balance is needed, supervisors are there to help.



## We track the happiness of our employees with two KPI's:

### 2025 KPI: Satisfaction with daily work

**Target: 7.5**

**Results: 6.52**

We track our employee satisfaction six times with our Pulse survey results (scale 1–10). In addition we track voluntary attrition and internal mobility data. The KPI is measured consistently across the organization, reviewed every two months, and used to guide leadership development, wellbeing initiatives, and improvements in our ways of working. We didn't quite meet our target in 2025.

To reach our target, we are:

- Monitoring our employee experience with regular employee engagement surveys (Pulse surveys)
- Constantly improving leadership transparency and internal communication based on Pulse data
- Supporting work-life balance and promoting wellbeing through launching Vincit's Feelgood Strategy
- Focusing on our Talent Strategy to give our employees a better understanding of the competencies needed to stay competitive

### 2025 KPI: Attrition, annual % (0–100%)

**Target: < 14%**

**Results: 16.4%**

This figure shows the percentage of Vincitizens who chose to leave (percentage of average headcount). We review these numbers monthly to guide our retention and people-related efforts.

We didn't quite meet our attrition target in 2025 because market conditions affected demand and limited the availability of assignments for all employees. Throughout the year, we focused on supporting employees through active communication, wellbeing initiatives, and fair processes. Despite these efforts, temporary layoffs and some workforce reductions were necessary.

To reach our target, we are:

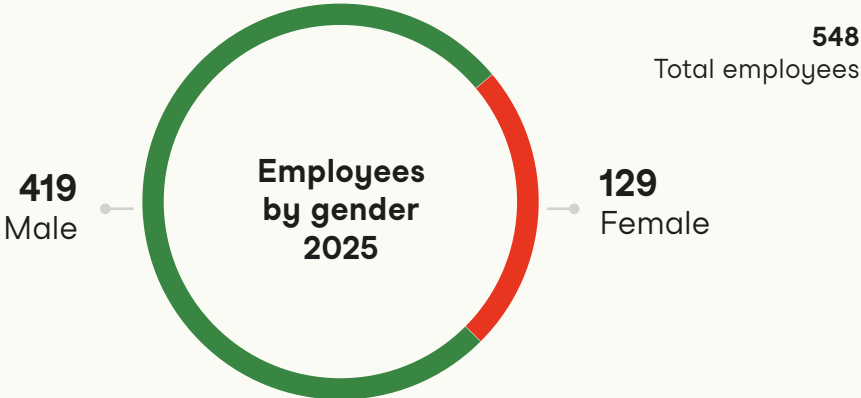
- Tracking the reasons people leave through exit surveys and interviews
- Using this feedback data to strengthen our employee experience.

# 4.2.1. Our team structure

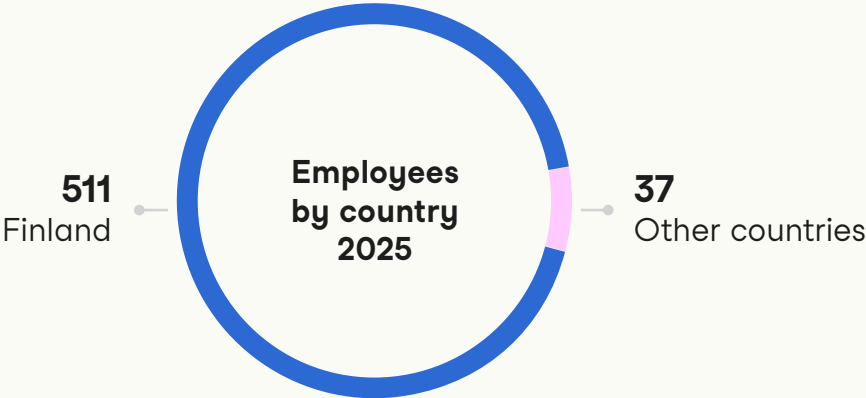
The essence of creating Better Mondays is a humane approach to working life. We strive to support every Vincitizen by providing flexible working options, meaningful work, challenging projects, and a collaborative team environment. Our goal is to build long-lasting employment relationships.

In addition to our in-house team, we work closely with external consultants and other non-employed experts on various projects. The same working principles apply to everyone who works for Vincit.

Our employee structure of is presented in the tables below. The figures are presented as 2025 average and include the entire Vincit, excluding non-employees like external consultants.



All Vincit employees share their gender information with our systems when they start their employment with us. Currently, fewer than 1% of the people working at Vincit identify as other genders. To respect everyone’s privacy, we only report the two largest gender categories. We have included the figures for other gendered Vincitizens in the male and female categories based on their personal identification numbers.



About 93% of all Vincitizens are based in Finland. In addition, Vincit has employees across Sweden, Poland, Portugal, and the USA.

# Our local communities



| <b>Employees by contract type and gender</b> | <b>Female</b> | <b>Male</b> | <b>Total</b> |
|--|---------------|-------------|--------------|
| Number of permanent employees                | 128           | 417         | 545          |
| Number of temporary employees                | 1             | 2           | 3            |
| Number of non-guaranteed hours employees     | 0             | 0           | 0            |
| Number of full-time employees                | 112           | 381         | 493          |
| Number of part-time employees                | 17            | 38          | 55           |
| <b>Number of employees</b>                   | <b>129</b>    | <b>419</b>  | <b>548</b>   |

The vast majority of the Vincitizens hold permanent, full-time contracts. Most of our part-time contracts exist because employees have personally chosen to downshift their workload. In 2025, fewer than 1% of Vincitizens worked under a temporary contract.

During 2025, challenging market conditions impacted our operations, leading to three change negotiations, two of which included headcount reductions. Because sales did not reach the levels we needed, some of our experts faced long periods without billable projects. To ensure the continued profitability and future resilience of Vincit, the leadership team unfortunately had to make the difficult decision to reduce our headcount in the areas where these challenges were most prolonged.

| <b>Employee turnover (headcount)</b> | <b>2025</b>   |
|--------------------------------------|---------------|
| Employees left                       | 159           |
| <b>Employee turnover (%)</b>         | <b>29.01%</b> |

Employee turnover has been calculated by dividing the number of all employees by the number of ended contracts.

## 4.2.2. Wellbeing and work-life balance – How we promote VincitiZEN

Between juggling projects, back-to-back meetings, and a sea of Slack messages, finding the VincitiZEN needed for Better Mondays can be a challenge. We've been listening to our employees' feedback and diving into the data, and the message is clear: we need to strengthen the way we manage our employees' work ability. That's why we launched the Feelgood Strategy.

Think of it as our long-term, Vincit-wide roadmap for creating a healthier, more supportive, and more sustainable work environment. It's about giving all of us the tools and structures we need to thrive, both personally and professionally. The strategy supports employee wellbeing, promotes sustainable work ability, clarifies roles in work ability management, establishes monitoring metrics, and enhances expertise in work ability management across key roles.

We currently have two teams working on different things:

### **Feelgood Strategy working group**

- Focuses on the strategic part of the work
- Connects the dots and shares information across all parts of the organization
- Digs into problem areas and finds effective solutions
- Sparks new ideas to improve our wellbeing and work life
- Turns talk into action

### **Training program team**

- Participates in Ilmarinen's training program on the Strategic Model of Work Ability Management (September 2025 – June 2026).
- During the [training program](#), we built our own strategic work ability management model, which brings together our fragmented practices into one comprehensive framework. The program includes meetings and assignments that help turn the model into action.

We published the Feelgood Strategy 2025–2028 in September 2025. Our big-picture goal is to improve wellbeing across Vincit and bring our sick leave rates down to the industry average of under 3%. We see this not just as a number, but as a clear sign of a healthy and thriving workplace. Our partner Mehiläinen provides the benchmark figures, and we review the data monthly directly from their systems.



**KPI: Sick leave %**

**Target 2025-2028: < 3.0%**

**Results 2025: 3.1%**

We calculate the sick leave % by comparing total sick leave hours to expected utilization hours over the past 12 months.

To reach our target, we:

- Built closer collaboration with our partners Ilmarinen & Mehiläinen
- Organized Training and sparring for supervisors, People Business Partners & project leads
- Placed emphasis on proactive early support for employees' work ability by:
  - Focusing on early signs of burnout
  - Moving from reactive to proactive measures
  - Taking better charge of longer absences
- Participated in Ilmarinen's work ability management training programme, as a result of which a three-year strategy is being developed to support wellbeing at Vincit
- Created and launched a wellbeing-focused communications plan, reminding everyone about basic well-being: nutrition, breaks, social connections, meaningful work, exercise, sleep and recharging
- Added work ability to the leadership team's agenda
- Developed metrics for tracking our success and risk factors

**Health and safety metrics**

**2025**

|                                   |      |
|-----------------------------------|------|
| Number of work-related fatalities | 0    |
| Number of work-related accidents  | 1    |
| Injury rate                       | 1.34 |

The accident figures only consider employees in Finland. The only accident relates to a foreign object found in food.



# 4.2.3. Career development and competence building

## – How we support growth



To ensure Better Mondays, we empower every Vincitizen to lead their own growth. In an expert organization, continuous learning is the foundation of both employee satisfaction and customer success. We invest in future talent through our Rising Star program and provide the tools for everyone to expand their expertise.

In 2025, 85% of our employees completed a formal growth discussion. For us, development is a blend of training, peer learning, and challenging projects, allowing everyone to evolve according to their own professional aspirations.

Vincitizens log their training hours in Severa, our time-tracking system. Based on these reports, an average of 48 hours was used for competence building per Vincitizen during 2025. Sometimes in the middle of a busy workflow, it's easy to forget to separate these hours from project work. Based on our discussions with our employees, we know that the actual amount of training hours is higher, potentially by as much as a third.

| Training metrics  | 2025                                |
|---|-------------------------------------|
| Average training hours per employee                                 | 48                                  |
| Percentage (%) of employees that participated in growth discussions | 25% <sup>1</sup> / 85% <sup>2</sup> |

\* Based on: 1 our HR system information and 2 responses in employee survey done in September 2025.

# 4.2.4. Diversity and equality – How we celebrate our differences

We believe that extraordinary things are created together. Success at Vincit means getting where we want to go and beyond together, while keeping work balanced and playful—and being our authentic selves. The more diverse our workforce, the better we innovate and understand end-user needs.

We see diversity consciousness as a skill that can be developed and are on a continuous journey towards a more diverse, equal and inclusive work life. We got started by:

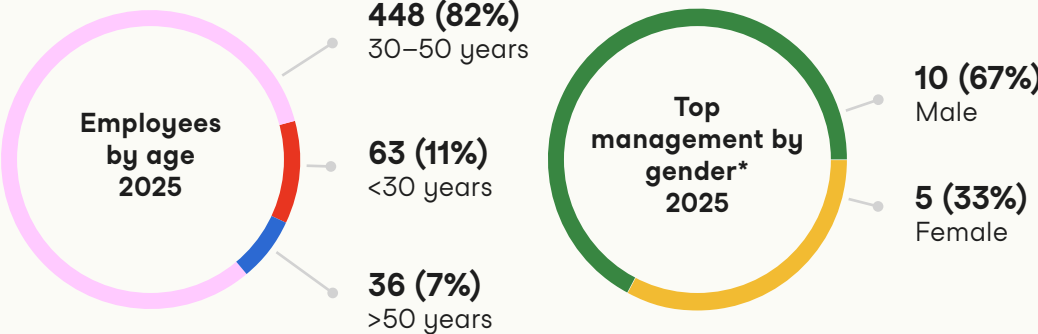
- Embracing differing backgrounds and building diverse teams
- Listening to diverse opinions with respect
- Learning from each other
- Striving to make everyone feel welcome at our communities, offices and events
- Always speaking up because we care about each other
- Promoting salary transparency

These actions are made possible by our clear instruction of how to be a Vincitizen in our Code of Conduct and Culture Handbook. We have a dedicated Radag Group supporting the development of inclusive culture, and an Equality and equity plan in place to ensure regular development and monitoring. We also have clear career pathways and transparent recruitment guidelines guiding to equality, open salary policy and processes in place for cases of misconduct.

We have zero tolerance for discrimination. During 2025, we received three Whistleblowing reports. Two of them concerned general feedback regarding a Vincit leader’s style; no formal investigation was launched for these as they did not involve allegations of illegal activity or discrimination. The third report raised suspicions of a leadership member

improperly promoting a specific candidate during the selection process for a service partner. An investigation into this matter concluded that no abuse was detected. There were no confirmed cases of discrimination, harassment, violation of human rights, or any other misconduct.

## Key numbers on diversity



\* Top management covers Vincit’s Board and Extended Leadership Team

| Family-related leaves                                  | 2025   |        |        |
|--|--------|--------|--------|
|  | Female | Male   | Total  |
| Percentage of employees that took family-related leave |        |        |        |
| Total  | 38.76% | 25.30% | 28.47% |

\* The figure includes:  
 - Pregnancy, parental leave, and childcare leave  
 - Helping aging parents  
 - A sudden family situation

During parental leave, Vincit pays a full salary for a total of 36 working days—a benefit that goes beyond what is required by law. This support is available to:

- the birth parent
- the non-birth parent
- any other person participating in the care of the child who has been granted parental leave, provided their employment relationship has continued continuously for at least five months before the calculated birth date.

## Agreements that protect our people

We have developed our own local agreements for employment terms in collaboration between the employer and employees. The terms apply to in Finland, except for individuals working under executive agreements. This means that approximately 93% of Vincit’s personnel is covered by this agreement. The purpose of the terms is to make Vincit an attractive workplace. They are guided by the Collective Agreement of the IT Service Sector but we have added bits of Vincitness in it. To go above and beyond “what is expected,” we have established local agreements on:

- paid family-related leaves
- flexible working hours
- reserve time and overtime.

The working conditions and employment terms of the individuals working under executive agreements are determined in their respective employment contracts.

## Our commitment to fair compensation and equality

As a global employer, we are committed to ensuring that every employee receives a fair, competitive, and living wage. Our goal is to promote pay equity across all our operations, ensuring that compensation is based on roles, responsibilities, and performance, regardless of gender or background.

While our Finnish operations follow established terms of employment, our teams in Sweden, Poland, Portugal, and the USA are smaller and not covered by similar structures. To ensure fairness for everyone, we apply a synchronized global approach:

- **Global alignment:** We conduct salary reviews for all countries simultaneously with our Finnish processes to ensure consistency across the whole company.
- **Inflation & cost-of-living adjustments:** We actively monitor local inflation and economic shifts in each market (SE, PL, PT, US) to maintain our employees’ purchasing power.
- **Equality & competitiveness:** By benchmarking against local market data, we ensure our salaries remain competitive and reflect a true living wage. Our continuous goal is to eliminate any unjustified pay gaps and foster a culture of transparency and equality.

| Remuneration metrics   | 2025  |
|--|-------|
| Gender pay levels and gap*   | -1.53 |
| Annual total remuneration ratio between highest paid individual and median employee remuneration** | 3:1   |

\* The gender pay gap has been calculated by dividing the difference between average hourly pay of men and women, by the average hourly pay of men. The pay figures include only base salary.

\*\* The pay figures include the entire annual salary of employees and the highest paid individual.

We have had an open salary policy for years to promote equity and increase transparency. Our employees have been given the opportunity to publish their own salary to other Vincitizens for nearly a decade. In Finland, our open salary model includes Salary Weeks held once or twice a year, where each employee can choose whether to publish their salary or not. Participation in Salary Weeks is voluntary but the majority of Vincitizens have opted to share their figures.

## 4.3. Better Mondays for our customers



### Do you believe that digital services can make the world a better place? We do.

Creating Better Mondays is also a commitment towards our customers and end-users. Digital services play a significant role in our society and our impact on the planet. At Vincit, we influence the Mondays ahead by helping our customers transform into better versions of themselves. We work side-by-side with them, shaping their business and designing solutions to complex problems. We're committed to ensuring that all our projects meet our high standards of accessibility and digital trust.

Our commitments to customers—including human rights, working principles and information security—are outlined in our Code of Conduct in [chapter 5](#). The Code of Conduct explains how the Better Mondays are built, for our customers, too. This means being a trustworthy and honest partner by being genuinely helpful, transparent, and great at what we do. Because our partners and contractors also affect the value we provide, we expect them to operate with the same high standards of integrity we hold for ourselves. To ensure this, they are required to commit to our Code of Conduct.

For end-users, the material aspect is to keep our solutions inclusive and user data safe. In our Code of Conduct, we commit to practicing digital security and safety. In today's world, security and safe online behavior are everyone's responsibility. This means we are all vigilant, follow best practices, and integrate security into our thinking and our work to protect both Vincit's and our customers' valuable data and operations.

We have a clear process to prevent, act on and report digital security issues. Our commitment to and practices for inclusive design are part of Vincit Design Guidebook, and described in the following chapter.

### 4.3.1. Digital solutions for diverse users



At Vincit, we believe that digital services must be accessible to everyone, regardless of their abilities or background. By prioritizing accessibility from day one, we strive to create products that are usable and enjoyable for people with varying visual, auditory, speech, physical, cognitive, and learning needs. For us, inclusivity isn't an afterthought—it is a core component of sustainable, human-centric software that empowers the widest possible audience.

We support this vision by staying ahead of international standards and evolving regulations. We build our solutions to meet or exceed recognized standards like the Web Content Accessibility Guidelines (WCAG) and EN 301 549, and ensure compliance with legislations like the European Accessibility Act.

However, our motivation goes beyond simple compliance. We see these frameworks as a blueprint for quality, allowing us to build resilient, future-proof digital services that respect every person's right to participate fully in the digital world.

To guarantee we have the skills to deliver on this, we are continuously developing our [internal accessibility competences](#). As part of this effort, more than 30 of our experts have already completed the “W3C Introduction to Web Accessibility” course.

Our Vincit Design Guidebook gives the key principles and a set of useful resources on making all our designs accessible to everyone.

## 4.3.2. Data privacy and security – How we build on a foundation of trust

Security and privacy are at the core of Vincit’s operations. Our mission is to be the trusted partner of choice. Our security processes are guided by an established ISO/IEC 27001:2022 certified Information Security Management System (ISMS). We systematically integrate Security and Privacy by Design principles into our software development lifecycle, ensuring that potential risks are identified and mitigated early on in the development process.

Our Secure Software Development Lifecycle (SSDLC) covers structured risk assessments, threat modelling, secure coding practices, security testing, supply chain security, and formal verification and acceptance procedures. These controls ensure that every solution we deliver to our enterprise customers incorporates the appropriate safeguards for confidentiality, integrity, and availability following our high standards.

Since we don’t always operate or maintain the systems we build, the long-term responsibility for information security management and data protection shifts to our customers after delivery. To support this transition and ensure Better Mondays for the future, we provide comprehensive documentation, implementation guidance, and recommendations for continued compliance and secure operations to our customers, enabling them to uphold and further develop the protections designed into the delivered solution.

Through these processes, we contribute to the prevention and mitigation of material impacts on consumers and end-users, support our customers’ compliance with applicable regulatory requirements, and strengthen trust in the digital solutions we develop—helping our customers to be better versions of themselves. Our continuous improvement mechanisms ensure that as security and privacy standards evolve and

new risks emerge, we are already addressing them in our next development initiatives.

To ensure we develop secure and privacy-compliant software solutions, we have set three strategic goals:

- Continuous application of Privacy by Design and Security by Design principles across all our development projects
- Annual maintenance of our ISO/IEC 27001:2022 certification
- Ongoing implementation of a Secure Software Development Lifecycle (SSDLC), including structured risk assessments, threat modelling, and security testing

To achieve these objectives, we embed security and privacy requirements into all development phases, conduct annual internal and external audits related to our integrated management system (ISO/IEC 27001, ISO 9001 and ISO 13485), perform regular training for Vincitizens, and integrate secure coding practices into project workflows. We also maintain formal processes for assessing supplier risks, and provide our customers with the documentation and recommendations they need to manage their own privacy and security environments effectively.



# 5. Our governance and culture

As Vincitizens, we are proactive in our communities and customer projects. We use our heads and hearts in our work and decision-making. We believe that great collaboration is based on transparency, trustworthiness, and daily thanks. Every Vincitizen is responsible for leading the atmosphere in our physical and digital spaces and communities. We believe in the power of daily encouragement and lifting each other up and helping each other in the path of personal growth with actionable feedback.

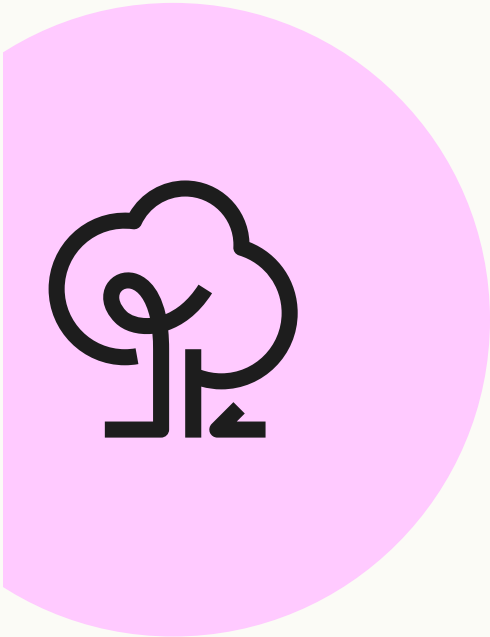
# 5.1. Our values

Our key value is creating extraordinary together. A lot can be done alone but we believe that the extraordinary is achieved by:

**Communities & collaboration**



**Taking responsibility**



**Being brave and**



**Having fun**



## 5.2. Vincit Code of Conduct

Our Code of Conduct is our guide to being awesome. It's based on our values and common sense, and it helps us build a workplace where everyone can feel proud and safe. The Code of Conduct also reflects our commitment to continuously improve our practices regarding ethical business conduct, occupational health and safety as well as environmental protection. We see the Code as our collective promise to each other, our customers, and our partners.

### Code of Conduct

|  |   |
|--|---|
| Third-part commitments                                 | <p>The Code of Conduct is aligned with the following frameworks</p> <ul style="list-style-type: none"> <li>• The OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct.</li> <li>• The UN Convention Against Corruption</li> <li>• The ILO Core Conventions on labor rights and decent work</li> <li>• The UN Guiding Principles on Business and Human Rights (UNGPs)</li> <li>• Universal Declaration of Human Rights</li> <li>• UN Convention on the Rights of the Child</li> <li>• Convention on the Elimination of Discrimination Against Women (CEDAW)</li> <li>• International Convention on the Elimination of All Forms of Racial Discrimination (ICERD)</li> <li>• The Paris Agreement and Science Based Targets initiative (SBTi) for climate action</li> <li>• The EU Waste Hierarchy and Ellen MacArthur Foundation's Circular Economy Principles</li> <li>• The Kunming-Montreal Global Biodiversity Framework (GBF) for protecting and restoring nature</li> </ul> |
| Key contents   | <ul style="list-style-type: none"> <li>• Company culture to create Better Mondays for everyone, including our planet</li> <li>• Employee wellbeing and equality</li> <li>• Customer safety and information security</li> <li>• Good Governance</li> </ul>   |
| Roles accountable for implementation                   | This Code is approved by Vincit's Board and implemented by senior management. The CEO and Leadership Team are responsible for ensuring compliance, communication, and continuous improvement.   |
| Scope  | Own employees, suppliers and partners.  |
| Process of monitoring                                  | The implementation of the Code of Conduct is monitored through whistleblowing reports by senior management.   |
| Conducted stakeholder engagement in setting the policy | HR has been involved in creating the Code of Conduct to ensure that the interests of employees are presented.   |
| Availability   | All employees receive Code of Conduct training during onboarding and at regular intervals. Suppliers and partners are informed about the Code as part of our collaboration process. The Code is available to the public on Vincit's website and internally on our intranet.   |

In addition to Code of Conduct, we have a more practical Culture Handbook that gives Vincitizens guidelines on how we work together and with our customers, how we give feedback, and how we communicate and make decisions.

## 5.3. Partnerships

Both individual contractors and subcontracting companies that work for us must demonstrate high-level expertise in the required subject matter and undergo qualitative assessment as part of their approval process. We require all our suppliers to comply with our Code of Conduct, which they sign as a formal appendix to our Frame Agreement.

In addition, we evaluate all subcontracting arrangements from a business perspective to ensure they support Vincit's continued profitability. Our Partner team facilitates and supports the approval of subcontractors to ensure we manage our supplier relationships consistently. Finally, we ensure that payments to our suppliers are always made according to the specific payment terms on each invoice.



## 5.4. Investor relations

Our Investor Relations (IR) team supports transparent, consistent, and responsible communication with the capital markets and the investment community. Through proactive and open investor relations, we aim to build trust, support informed decision-making, and reinforce our commitment to responsible governance and long-term value creation. Read more from [chapter 4.1](#).



## 5.5. Whistleblowing channel

The Vincit Whistleblower channel is a confidential and secure service for reporting serious misconduct, illegal activity, or violations of our core values and operating procedures. To comply with the Whistleblower Act, all companies employing over 50 people must provide an internal notification channel for reporting serious wrongdoing. While the law primarily focuses on named declarations, we have chosen to also accept and process anonymous reports to encourage transparency and trust to ensure we live up to our high standards for being a good company.

This notification channel is available to a wide range of our stakeholders, including:

- Current and former Vincitizens
- Job applicants
- Shareholders and Board members
- Subcontractor and supplier employees
- Voluntary workers and trainees

A link to the service is also available at our website for all stakeholders, including customers and end-users.

The Whistleblower reports are handled by a dedicated, neutral admin team of Vincitizens. If a notification relates to or implicates an admin team member, they will be immediately replaced by an objective processor to ensure the investigation remains impartial.

The admin team coordinates the delegation of the report to the most appropriate party, such as Vincit's leadership team, the police, or another suitable external party. Every investigation is documented and conducted by objective individuals.

To keep our process fair and transparent, we follow strict protocols for high-level cases:

- **CEO and direct reports:** If a report concerns the CEO or those reporting directly to them, the Chair of the Board is informed. The investigation is then conducted by an external expert or an impartial internal investigator appointed by the admin team.
- **Board members:** If a report concerns a member of the Vincit Board, the investigation is always conducted by an impartial external investigator.

## 5.6. How we prevent corruption, bribery and money laundering



To ensure the integrity of decision-making at Vincit, members of the Vincit Board recuse themselves from any decision where a conflict of interest may arise. Both our leadership and board members are required to declare any potential conflicts of interest in advance. We are happy to report that there were no such situations during this reporting period. Our board members' fiduciary duties are reported on our website.

We prevent corruption and bribery through a formal governance framework that includes our Code of Conduct, a dedicated whistleblowing channel, and a strict zero-tolerance policy for both retaliation and bribery.

If any reports or allegations arise, they are investigated through a structured process that ensures total confidentiality, impartiality, and appropriate corrective actions. Together, these practices support our ability to manage material risks and advance a culture of integrity across Vincit. We did not identify any confirmed incidents of corruption or bribery during this reporting period.



**Vincit Leadership Team has signed the  
Sustainability Report 5/2026**