Sustainability Report 2023

accountor

SOFTWARE BUSINESS

a⁺

This report was published on 12.4.2024.

01 Accountor – forerunner in financial and HR management

1.1 Organisation

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

Our headquarters is in Espoo, Finland. In the end of 2023 we have over 686 employees in Finland and Sweden.

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

Accountor software business headcount	**686**
Finland	673
Sweden	13

Rovaniemi

Oulu

Jyväskylä

Tampere

Turku   HQ Espoo

Stockholm
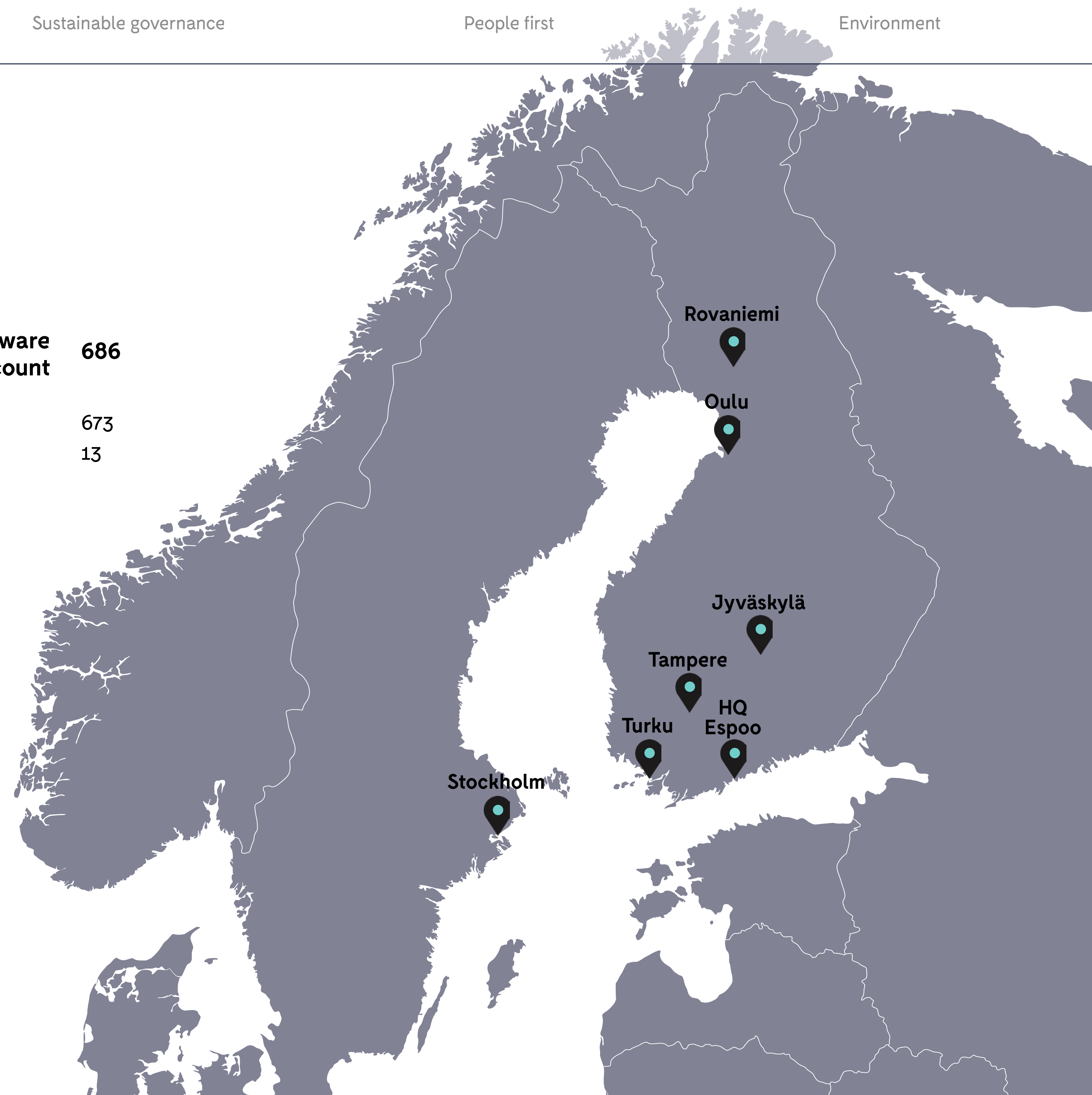
Accountor's mission

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

Accountor's values

Respect is a principal attitude towards other people. *Trust* means professional attitude, long-term delivery, skills, and personal commitment (going the extra mile). *Courage* is something we want to foster in the company, to stretch out of the comfort zone. *Future* is the place where we will live for the rest of our lives.

Products and Solutions

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

Financial management systems

- Financial management system for SMEs and accounting firms
- Billing solutions
- Digital receipt and travel expense handling system
- Corporate payment card

Payroll and HR systems

- Payroll and HR management software
- Workforce management systems
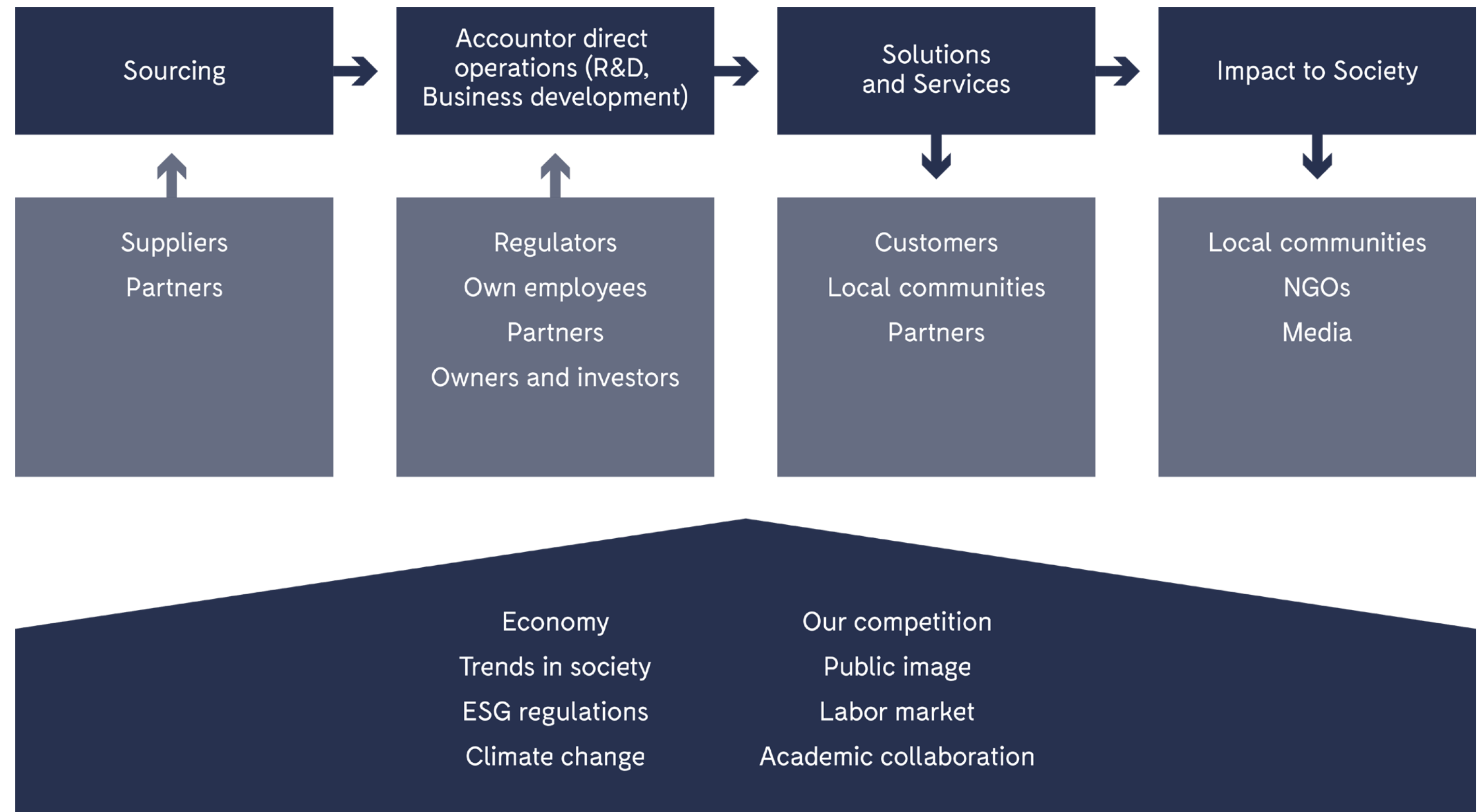- Working hours tracking systems

Value chain

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

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

In addition to our core business, we partner with several companies in different areas to complement our software and solution offering. Such areas are, for example, research and digital ecosystem collaboration.

Sourcing	→	Accountor direct operations (R&D, Business development)	→	Solutions and Services	→	Impact to Society

Suppliers Partners	Regulators Own employees Partners Owners and investors	Customers Local communities Partners	Local communities NGOs Media

Economy   Our competition

Trends in society   Public image

ESG regulations   Labor market

Climate change   Academic collaboration

1.2 Sustainability year 2023

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

In addition, Accountor's Financial Management Software unit earned international ISO 27001 information security certificate. It is solid proof that our information security practices are aligned with globally recognised standards and ensures the safe processing of our customers' data.

Future-oriented sustainability management
Acountor has set long-term sustainability priorities and targets until the end of 2026. They are based on our stakeholder expecta-

tions revealed in the materiality assessment. In this report we can measure our progress against strategic long term sustainability goals.

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

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

To enhance our sustainability management competence, we recruited a Sustainability

Lead who started to drive our sustainability work forward in the beginning of 2024.

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

Ensuring inclusive quality education and promoting lifelong learning opportunities for employees continued in 2023 with more than 10 hours of recordedtraining per person in total.

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

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

To support our customers even more, we continuously expand our ecosystem with sustainability services and solutions, such as an automatic carbon footprint calculation service introduced in 2023. The service enables

companies to easily monitor the development of their carbon footprint.

We renewed our product development practices and principles to ensure the sustainability of our software solutions.

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

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

Supporting Ukraine war victims
As the people in Ukraine continued to suffer from the war in 2023, we continued to provide support to them, for example, with donations through the Finnish Red Cross to help the victims of the war and flood crisis in Ukraine.

1.3 President and CEO's forewords

Niklas Sonkin
President and CEO
of Accountor Group

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

I am excited that we improved our sustainability rating last year from Bronze to Silver EcoVadis Medal. It is noteworthy that the improvement was driven especially by actions and visible progress in the environmental area: we reached an excellent 37% reduction in the CO_2 emissions per employee last year. Accountor's strengths

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

Through our regular customer and brand surveys, I am happy to learn that Accountor is valued as a reliable, trusted, and professional business partner. From the results it is also evident that sustainable business conduct is becoming increasingly important for our customers, when evaluating new partners. In addition, I am satisfied that we are progressing in the development of solutions and services that support our customers to fulfil the future sustainability requirements more easily.
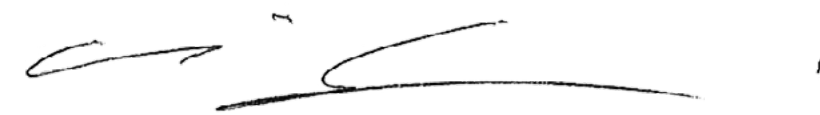
In this era of ever-increasing cyber risks, protecting and securing data and privacy remains as one of Accountor's focus areas. We are committed to providing safe and trustworthy services to our customers. We require our suppliers to follow Accountor's high standards not only in information security and data protection but also in other ethical governance and sustainability matters. By increasing the engagement of our partners and suppliers we can strengthen our business ecosystem.

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

I would also like to highlight that Accountor continued to be perceived as an attractive employer. Our People First principle and its activities promoted inclusive as well as full and productive employment for nearly 700 employees and on average over 150 external employees last year. In addition to

Accountor's high ethical conduct, Accountorians showed their compassion by using more than 100 hours of work time in voluntary work.

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

Niklas Sonkin
President and CEO of Accountor Group
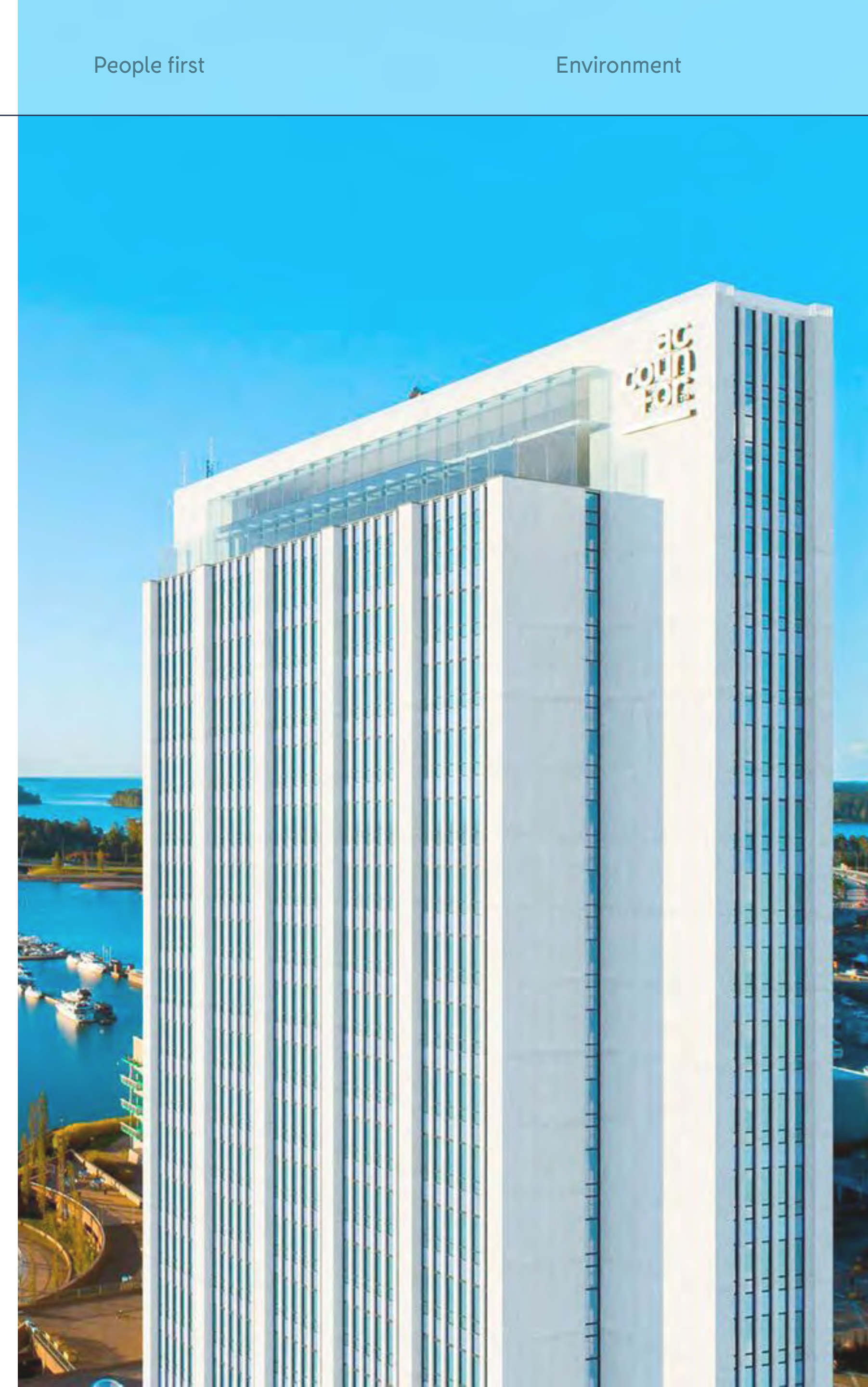
1.4 Stakeholders

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

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

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

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

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

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

Government, organisations, associations and NGOs

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

Accountor's Board of Directors monitors all memberships regularly from competition law and antitrust perspective. In Finland, we collaborate with Finnish authorities to create an overview of the financial situation of small and medium-sized enterprises and to enable forecasting during financially instable times. To ensure our service and solution compliance, we collaborate with our operating countries' tax administration and continuously monitor EU-wide legislation.

Customers, partners, end-users and local communities

Accountor exists for its customers to help them and their employees through our products and solutions. We value our customers' opinions and actively seek their feedback through regular customer surveys. Moreover, we believe in maintaining an ongoing dialogue with our customers through convenient online services and active customer communication. According to our

Partner Program we are validating new partners ability to fulfill our above-mentioned requirements and our own score models. Starting from year 2023, we also inspect ESG reports (provided by Suomen Asiakastieto Oy) of our new partners, before we accept them to our partner ecosystem.

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

Suppliers

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

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

02 Sustainability at Accountor

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

2.1 Summary about sustainability at Accountor

Working in a sustainable manner is the core of our business. At Accountor, sustainability primarily means confidentiality, secure handling of information, ethical operations, and putting our people first. Accountor consistently increases contribution to sustainability as stated in our Environmental, Social and Governance (ESG) Policy.

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

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

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

Digitalisation

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

Digitising invoices in purchasing and revenue cycle

Digitising HR processes
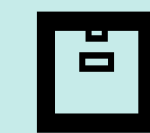
Digitising archive processes

Efficiency

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

Efficient processes and solutions

2.2 Sustainability focus areas

2.2.1 Material topics

We have conducted a materiality assessment by engaging key internal and external stakeholders. Based on the materiality analysis we recognised twelve key topics that are most relevant and impactful when considering Accountor's sustainability.

We emphasize how Accountor own sustainability topics link with the upcoming European Sustainability Reporting Standards (ESRS) topics.

Materiality Matrix

Social   Environmental   Governance   ESRS Topics

Negative impacts of digitalisation

Technological innovation, automation and artificial intelligence

Information Security

Climate change

Employee health, safety and wellbeing

Data Privacy

Financial responsibility and tax contribution

Talent attraction and retention

Sustainable products and services

Diversity, equality and inclusion

Personnel responsibility

Competence Development

Concern of external stakeholders — Very high / High

Importance to internal stakeholders — High / Very high

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

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

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

Double materiality table

Topic ESRS	Topic Accountor	Theme	Potential or actual positive impact	Potential or actual negative impact	Potential or actual financial opportunity	Potential or actual financial risk
Climate change: energy and mitigation	Climate change	Environmental	Providing tools and services that help customers to manage their CO_2 emissions. Accountor way of hybrid working.	Accountor Scope 1–3 CO_2 emissions.	Tools and services to help customers CO_2 emission reporting. Balanced customer-base including climate change resilient businesses.	Increasing costs imposed by regulation or customer business affected by climate change.
Own workforce	Competence development, DEI, Employee health, Safety and Wellbeing	Society	Developing financial and human resource management comptencies. Providing safe workplace and supporting employee wellbeing on and off work. Offering equal opportunities to diversed workforce. Access to wider talent pool to grow competencies.	Workload impact on well-being. Competences becoming obsolete in market disruption. Increased inequality via rewarding or limited career and development opportunities.	Competence development enables providing higher value services and solutions to customers. High wellbeing, employee retention and attraction decreasing cost.	Employee churn growing costs and affecting negative on service availability and affecting negative on customer churn.
Consumers and end users	Sustainable products and services, Technological innovation, Automation and Artificial Intelligence (AI)	Society	Accountor services and solutions in securing end-user data. GDPR	Exposed data or non-protected data.	Accountor provides tools and services that help customers to manage their financial and personal information in a secure way.	Potential fines related to privacy and information security cases. Impact to customer base.
Business conduct	Business ethics and anti-corruption, Data privacy and Information security, Financial responsibility and tax contribution.	Governance	The role of accounting in monitoring and preventing bribery and corruption. Increased company reputation and benefiting the society through credible services.	Negative impacts regarding potential corruption and bribery within customers. Damaged company reputation.	Accountor offers tools to do financial reporting according to law. Added sales.	Potential fines for enabling bribery via our solutions. Data breaches and potential lost customers.

2.2.2. Sustainability priorities and targets

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

Accountor's sustainability priorities:

⚖ Governance

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

🌿 Environmental

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

👥 Social

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

Software business sustainability targets 2024:

1. Employee engagement total index above 4/5

2. Average training /employee 7 hours/year

3. 0 material* breaches or lawsuits regarding privacy

4. Top quartile ESG governance (Ecovadis silver rating)

5. CO_2 emissions/FTE –10% annually from 2020–2026

6. Renew 50% of our 2021 software code of primary solutions; Procountor and Mepco by end of 2026 according to sustainable Accountor way product development principles.

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

a+

Accountor – forerunner in financial and HR management   **Sustainability at Accountor**   Sustainable governance   People first   Environment

ACCOUNTOR SOFTWARE BUSINESS SUSTAINABILITY TARGETS 2024

Social

1. Employee engagement total index above 4/5

✓ **Achieved 2023:**
We reached level 3.96/5 or total index 75% total employment engagement index with renewed survey content.

✓ **Commitment 2024:**
Continue to keep engagement index of 74% during 2024, enabling reaching index level 78 by 2026.

2. Average training / employee 7 hours/year

✓ **Achieved 2023:**
We exceeded the target to train our employees and trained them on average 11 hours during 2023.

✓ **Commitment 2024:**
Continue to provide minimum 7 hours training/ employee on average during 2024.

Governance

3. 0 material breaches or lawsuits regarding privacy

✓ **Achieved 2023:**
We reached 0 material * breaches or lawsuits regarding privacy of the data.

✓ **Commitment 2024:**
Zero material breaches as a result of systematic mandatory training and continous process and tools development to mitigate breach risk.

4. Top quartile ESG governance

✓ **Achieved during 2023:**
We exceeded our target and were among top 20% of the Ecovadis rated companies

✓ **Commitment 2024:**
We aim to belong among top 15% of the Ecovadis rated companies.

Environmental

5. Cut CO_2 emissions/FTE -10% every year between 2020 and 2026

✓ **Achieved 2023:**
CO_2 emissions / FTE decreased from 2,23 tCO_2 to 1,4 tCO_2 (37%).

✓ **Commitment 2024:**
Cut CO_2 emissions / FTE from 1,4 tCO_2/FTE to 1,26 tCO_2/FTE (10%).

6. Renew 50% of our 2021 software code of primary solutions; Procountor and Mepco by end of 2026 according to sustaina-ble Accountor way product development principles.

✓ **Achieved during 2023:**
We created and trained sustainable product development principles and renewed 1% of our code accordingly.

✓ **Commitment 2024:**
We aim to renew at minimum 5% of code of our primary solutions: Procountor and Mepco according to sustainable Accountor way product development principles.

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

a+

Accountor – forerunner in financial and HR management   **Sustainability at Accountor**   Sustainable governance   People first   Environment

SUSTAINABLE DEVELOPMENT GOALS

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

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

SDG 4 – QUALITY EDUCATION
Chapter Competence development

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

SDG 10 – REDUCE INEQUALITIES
Chapter People First

Reduce inequality within and among countries.

SDG 8 – DECENT WORK AND ECONOMIC GROWTH
Chapter Labour management

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

SDG 16 – PEACE, JUSTICE AND STRONG INSTITUTIONS
Chapter Business ethics and policies

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

2.3 Introduction of frameworks and commitments

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

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

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

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

WE SUPPORT

UN GLOBAL COMPACT

As our sustainability context we use:

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

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

2.4 Managing sustainability at Accountor

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

Day-to-day management of sustainability governance was led in 2023 by the Chief Competence and Sustainability Officer

(CCSO), supported by other members of the ALT. Accountor Group's HR function was responsible for updating the ESG Policy and setting annual sustainability targets. At the end of 2023, Accountor decided to strengthen further the sustainability capabilities and recruiteda sustainability lead for software business units.

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

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

2.5 ESG in software products and services

In 2023, we have expanded our software ecosystem with partner solutions that support and expedite companies' sustainability aspirations. For example, a carbon footprint calculation solution, integrated with Procountor, helps companies analyse and potentially reduce their carbon footprint, demonstrating our commitment to double materiality topic Climate Change. In addition, Mepco Analytics solution includes reporting capabilities for equal pay. With our partner we also help our customers fulfil their compliance obligations, including money laundering laws and the "Know Your Customer" obligation. This secure software improves our customers' processes, minimises business risks, helps avoid fines, and protects the company's reputation, showcasing our commitment to ethical Business Conduct.

Our digital products reduce paper usage and transportation. We also utilise ethical and unbiased systems. By avoiding harmful biases and ensuring fairness, they contribute to a more sustainable and equitable technological landscape, benefiting our Own Workforce and Consumers and End Users.

At Accountor, we aim to prioritise energy efficiency and sustainable practices in the data centres used for our products. Together with Climate Partner, we started calculating CO_2 footprint from data centres for two of our biggest products. Our goal for the future is to understand all streams of the emissions for those products. In addition, writing efficient, open, and secure code not only enhances performance but also reduces energy consumption. Our target for 2026 is to revise 50% of our Procountor and Mepco code. Currently, we have revised 1%.

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

2.6 Reporting conventions

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

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

This report covers all Accountor software
business units as well as Group functions
(see Appendix 2. Accountor structure for a
comprehensive list of companies, highlighted
companies included in this report). Possible

exceptions are defined in Appendix 1. *GRI
Content Index*.

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

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

a+

03 Sustainable governance

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

Sustainable governance is one of the main themes for our sustainability work. Due to the nature of our business, information security and data protection are at the core of our sustainability work. According to our Partner Program we are validating new partners´ ability to fulfil our above-mentioned requirements and our own score models. Starting in 2023, we also inspect the ESG reports (provided by Suomen Asiakastieto Oy) of new partners, before we accept them to our partner ecosystem.

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

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

3.1 Business ethics and policies

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

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

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

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

3.1.1 Code of conduct

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

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

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

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

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

📄 **Read our Code of Conduct →**

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   **Sustainable governance**   People first   Environment

3.1.2 Corporate governance of Accountor group

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

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

Pursuant to the Articles of Association of the Company, Accountor's Board of Directors shall consist of no less than five and no more than eight members and, if elected, personal deputy members. The term of the board members is indefinite, and the board members elect a Chair to the Board amongst its members.

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

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

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

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

Anti-trust and fair competition

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

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

Whistleblowing

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

The Accountor Group Ethics Committee or another specified body within each country organisation handles confidentially all suspicions of misconduct that need to be addressed either via the whistleblowing channel or other reporting routes. In 2023, two cases were resolved as a result of Whistleblowing process.

Sanctions

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

a+

Accountor – forerunner in
financial and HR management   Sustainability at Accountor   **Sustainable governance**   People first   Environment

3.1.3 Tax principles

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

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

M€	2023	2022
Corporate income tax	3,8	0,9
Net VAT	21,1	16,6
Withholding taxes	10,3	11,8
Payroll taxes*	0,6	0,5
Total	**35,8**	**29,8**

*Does not include pension taxes

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

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

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

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

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   **Sustainable governance**   People first   Environment

3.2 Information security and data protection

Accountor prioritises information security and data protection within our sustainable governance framework. We adhere to legal requirements, authorities' decisions, and industry best practices.

Given the nature of our business, we handle personal and financial data extensively. Our robust security measures are regularly reinforced through comprehensive training. Since 2018, we have effectively used gamified phishing simulations for onboarding.
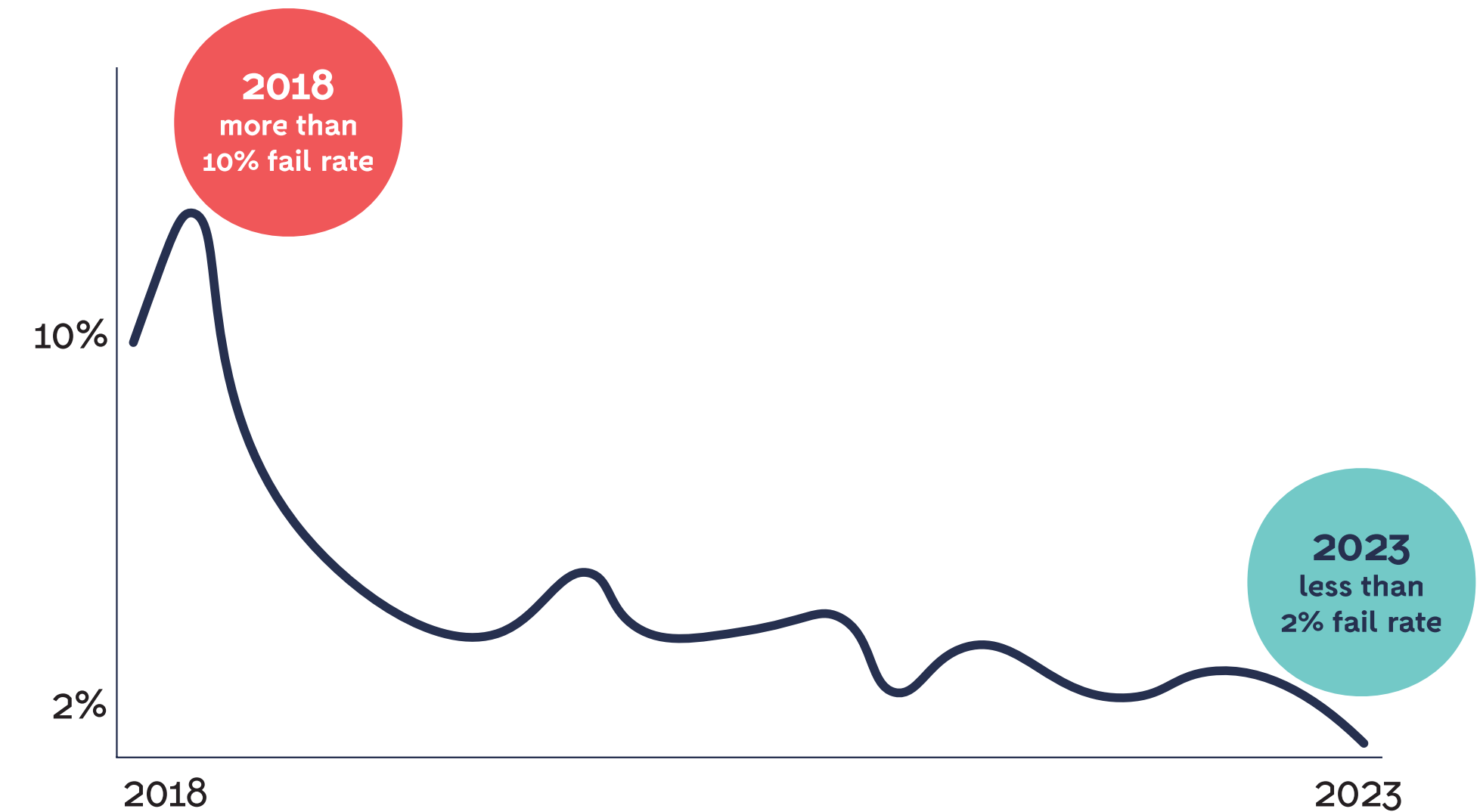
To ensure that we meet our stakeholders increased expectations, we intensified our focus on information security and data protection practices during 2023. Our preparations for upcoming EU regulations, including NIS2, involved a thorough investigation of requirements. We conducted a GAP analysis between our internal control catalogue and the directive. The implementation project started at the end of 2023.

Information Security

In 2023, Accountor FMS achieved ISO27001 certification, signifying an internationally recognised management system for information security. Our group-wide framework aligns with industry best practices and legal requirements. ISO27001 guides our policies, guidelines, and practices.

Our information security operations involve risk assessments, audits, and risk reduction plans. We maintain documentation and regular reviews.

To bolster security, we have expanded our resources. Alongside in-house staff and outsourced Security Operations Center services, we maintain a 24/7 on-call practice to safeguard critical services and infrastructure.

Phishing simulation training fail rate. (HoxHunt)
During 2023, we continued to strengthen our information security and data protection practices to ensure that we meet our stakeholders increased expectations. We started preparations for the upcoming EU regulation, such as NIS2, by investigating the requirements and running a GAP analysis between our internal control catalogue and the directive.

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

Data protection

We prioritise transparency in personal data processing for our customers, employees, and stakeholders. Our privacy statements are readily accessible, covering various groups such as customers, website visitors, and job applicants.
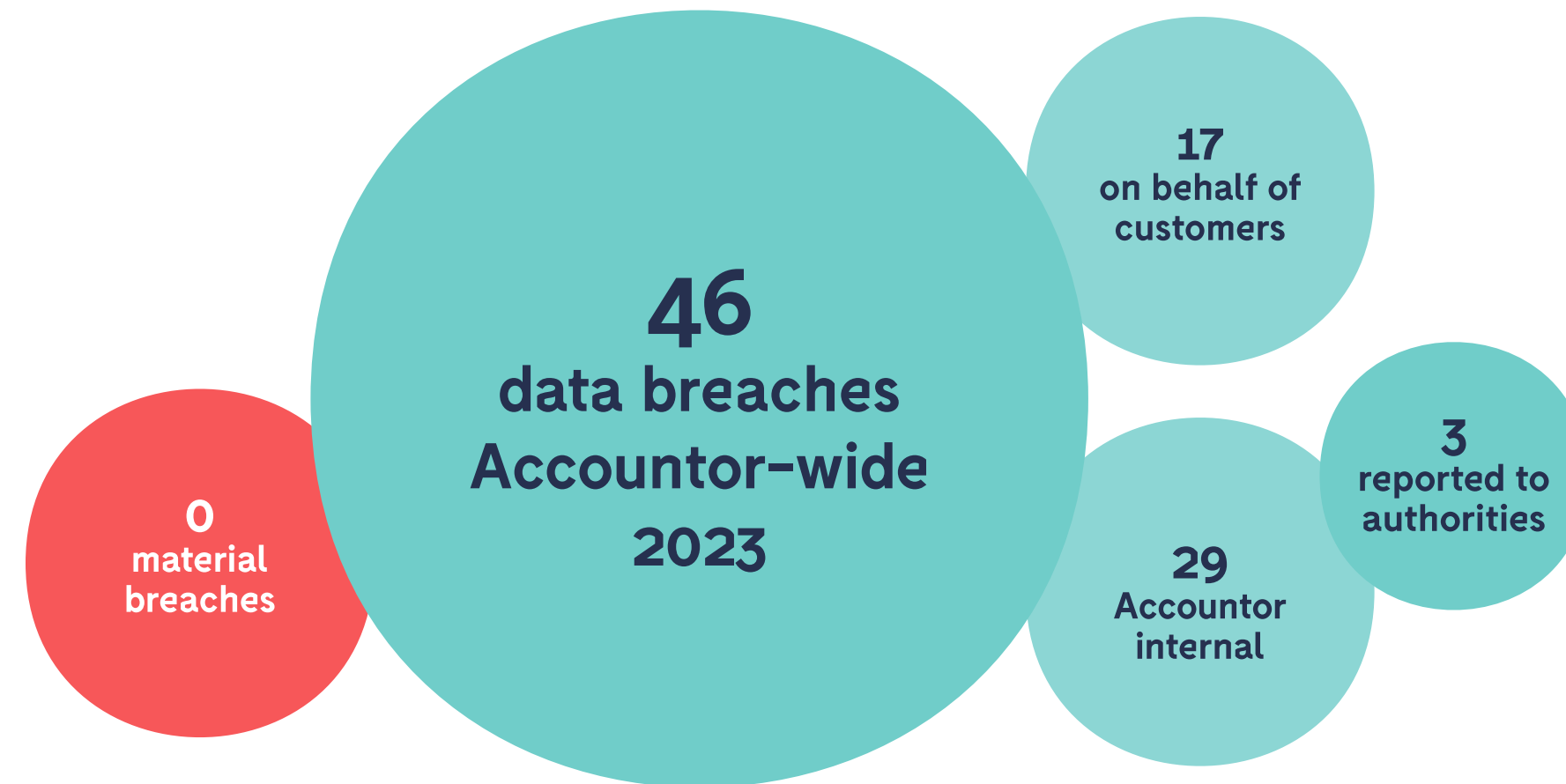
When handling personal data on behalf of customers, we provide detailed service descriptions. These explain how personal data is processed within our systems.

To ensure compliance, we conduct an annual self-assessment across privacy domains. Based on results, we prioritise activities for ongoing improvement.

**Information security and
data protection governance**

Accountor maintains a robust governance framework for information security and data protection. Key highlights include:

- **Risk and Compliance Committee:**
  Comprising select Leaderment Team members, this committee oversees security, privacy compliance, and related risks at the Group level. The Chief Information Security Officer (CISO) and Data Protection Officer (DPO) play crucial roles.

- **Business Unit Responsibility:**
  Each unit ensures implementation of security controls and data protection requirements. Operational support is provided by Information Security Managers and Data Protection Managers.

- **Team Structure:**
  Information Security Managers report to the CISO, while Data Protection Managers are part of the Group Privacy Team led by the DPO.

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   **Sustainable governance**   People first   Environment

0
material
breaches

46
data breaches
Accountor-wide
2023

17
on behalf of
customers

3
reported to
authorities

29
Accountor
internal

Security incidents and personal data breaches
Since 2018, we've diligently tracked information security incidents and personal data breaches. While we have encountered near misses, we have never experienced significant security incidents or data breaches related to our processed information or third-party vendors (such as cloud-based services).

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

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

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

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

3.3 Risk management

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

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

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

are reported to the ALT, the Risk and Compliance Committee and Accountor's Board of Directors.

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

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

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   **Sustainable governance**   People first   Environment

3.4 Supply chain management

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

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

a+

04 People first

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

4.1 People first principle in short

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

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

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

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

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

Motivation metric

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

Legend: 2023, 2022, 2021

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   Sustainable governance   **People first**   Environment
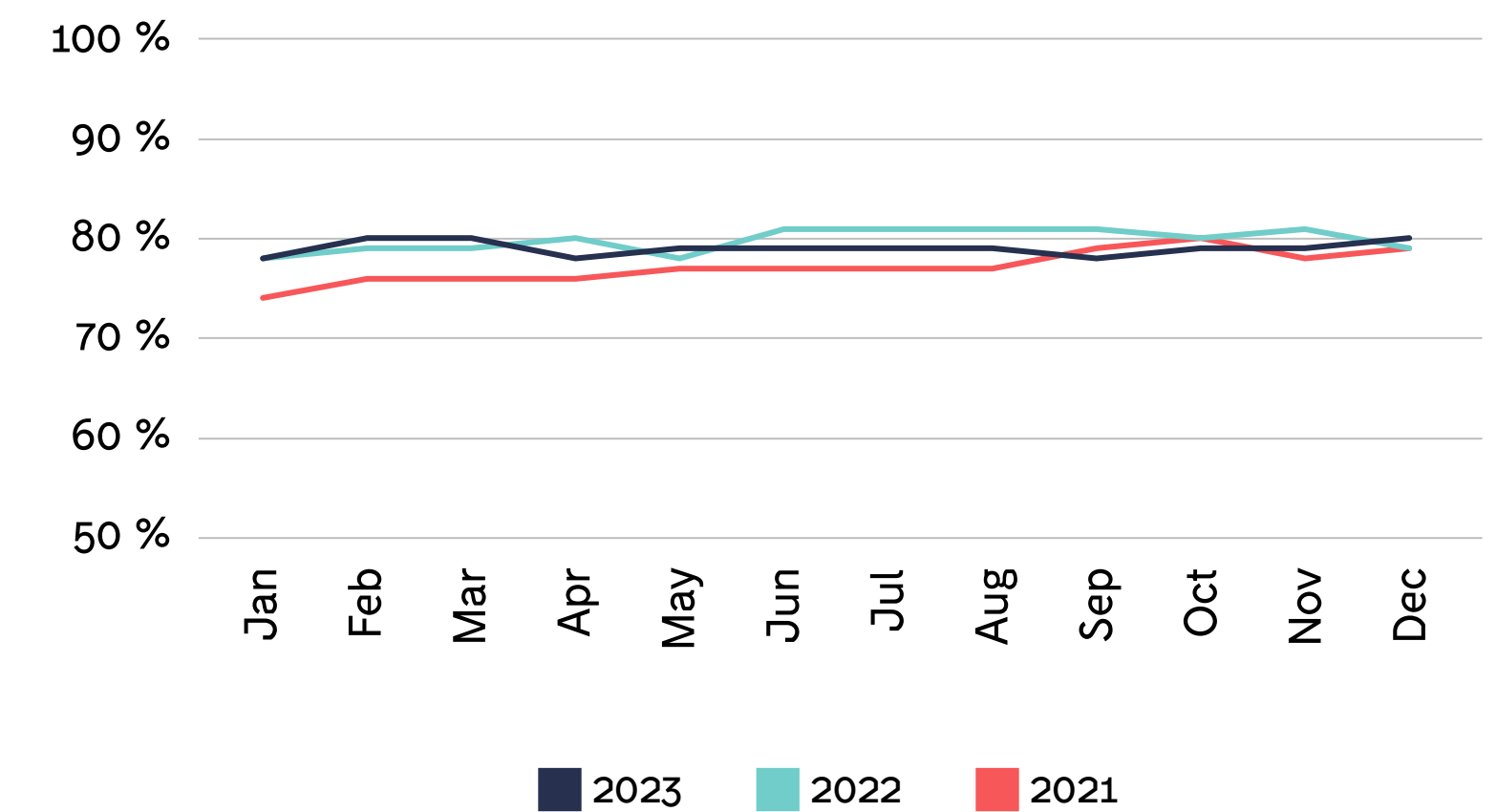
4.2 Competence development

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

Accountor's competence development target is that the average training hours per employee remains above seven hours annually. In 2023, the recorded training hours were in Accountor software business 11 hours per year (2022: 7h).

We make continuous effort to maximise employee motivation because we believe it supports better performance, continuous learning and wellbeing of employees. Our leadership and management philosophy called "Leaderment" is executed by each manager.

The Leaderment training path for managers consists of four modules and every manager that has either been promoted or has joined the company recently participates in the trainings. In 2023, Accountor managers participated actively in the Leaderment trainings and situational leadership training program and their annual training hours were in 35 hours per manager.

Our investment in Leaderment training and focus is apparent in the high employee satisfaction to managerial work at Accountor; 89% of the responses are positive for six manager work related questions in our annual People First engagement survey.

In 2023, our key areas of competence development were:

- Leadership and Management (Leaderment): Situational leadership and leading in Hybrid way of working
- Inclusion and diversity
- Certification like: Microsoft, Azure, ITIL, ISTQB testing
- Sustainability competencies: Inclusion and diversity, Business ethics and compliance, wellbeing in Hybrid, Health and Safety, Sustainable product development

Leaderment trainings organized 2023
Software Clusters (HR, FMS & HQ)

Training name	Duration/ training	No of participants	Training days total in 2023
Leaderment Kick-Off	10h / 1,5 days	4	6
Change Leaderment	14h / 2 days (+travel time)	41	82
Motivation Leaderment	14h / 2 days	16	32
Leaderment Communication	13,5h / 2 days	0	0
All Leaderment –trainings in Software clusters		**61**	**120**

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

Compliance trainings and meeting high ethical standards

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

Accountor aims that, in addition to 100% training coverage of previous employees, the new employees are trained on ethical matters within two months of their starting date. The mandatory ethical trainings include training on the Code of Conduct, information security, privacy, GDPR and a general introduction to Accountor. The mandatory trainings are available in every operating country in the local language on our virtual learning platform. 164 employees working for Accountor software business completed the induction training path during 2023 meaning all the new 150 recruits in addition to external employees working for Accountor.

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

Product development related competences

Accountor seeks to be a forerunner in digitalisation and automation of financial, payroll and HR fields. In software product development function the focus for trainings during 2023 has been in increasing azure and AI capability and also introducing sustainable product development practices.

Professional certification for software developers

Our product development employees are provided free access to certification programs in their field like ITIL and ISTQB testing certificates. Certification has positive impact on the base salary of the employee.

Accountor sponsors the fees and tuition of certification programs for our employees.

Induction path completions during 2022–2023
(per business unit)

- HR Cluster: 49 (2023), 47 (2022)
- FMS Cluster: 115 (2023), 119 (2022)

Legend: ■ 2023 ■ 2022

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   Sustainable governance   **People first**   Environment
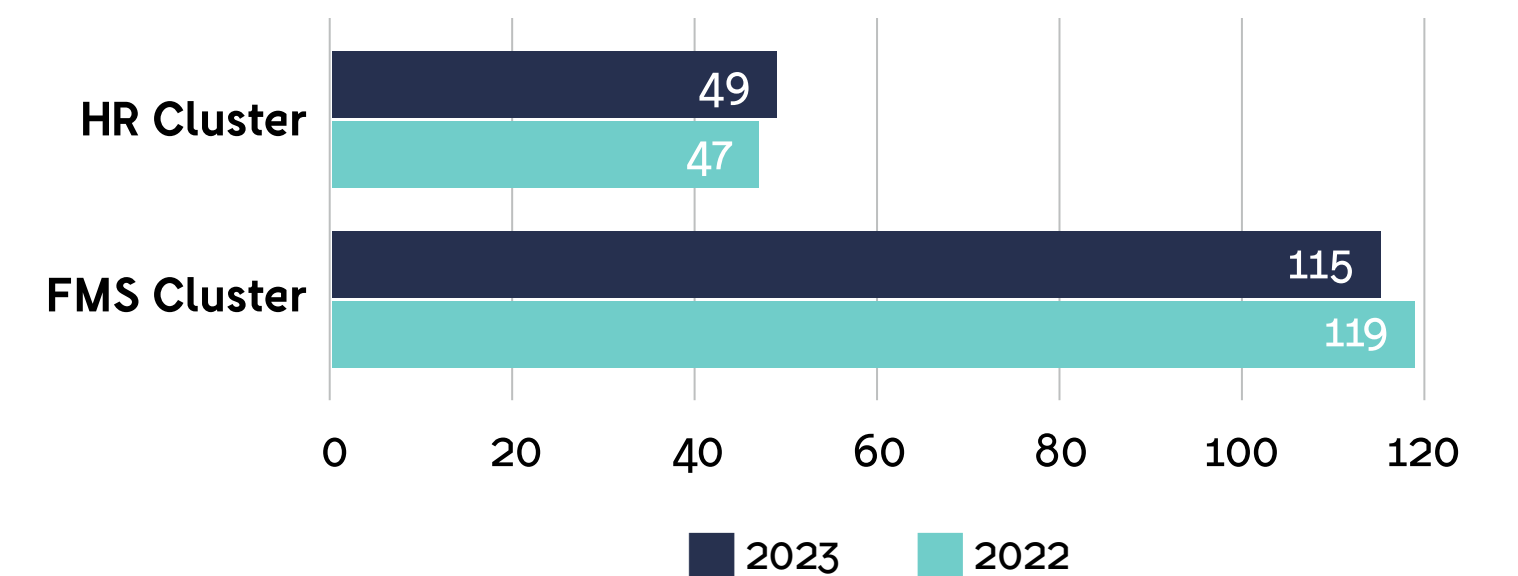
Participating in developing competencies across society

In addition to our own people, we participate in improving competencies that are needed in our modern society. For example, we arrange trainings ("Academies") in payroll, accounting and robotics for people with basic or no skills on the topics. The aim of these Academies is to foster future talent and offer them work at Accountor without, however, restricting their career ambitions outside of Accountor. In addition, we provide our software as a training platform to 26 higher education institutions around Finland without licence fee to support educating future talents in the field.

Health and safety

Accountor introduced in May 2023 a solution to protect employees against on-line harassment and bullying. 435 employees employees were trained how to stay safe and how to solve incidents supported by anonymous specialist service provided by Accountor.

Sustainability related advanced trainings

Accountor sustainability key stakeholders participated to on-line sustainability trainings in Ecovadis Academy. The key stakeholders selected one basic training along with their specialist area trainings during second yearhalf of 2023. All together 70 employees from procurement, facility management, risk management and legal professionals to human resources management have increased their capability to integrate sustainability for their daily responsibility areas during 2023.

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

4.3 Labour management

Accountor provides permanent employment for 98% and full-time employment for 96% of our 685 employees. During 2023 Accountor software business headcount increased with 55 employees as a result of business growth.

4.3.1 External workforce

Accountor also uses external workforce providers to complement our own workforce. The amount of external work in 2023 was 101 full-time equivalents (FTEs) on monthly average. In 2022, the average amount of external workers was 94 FTEs.

Our external workforce is mainly working in areas where the availability of capable workforce is limited, such as product development (70 FTEs). The monthly amount of external work varies depending on the product development roadmap. Our units have long-term collaborations with local external workforce service providers in all our operating countries. In addition, we have a long-term group-level collaboration with a software development company located in Poland.

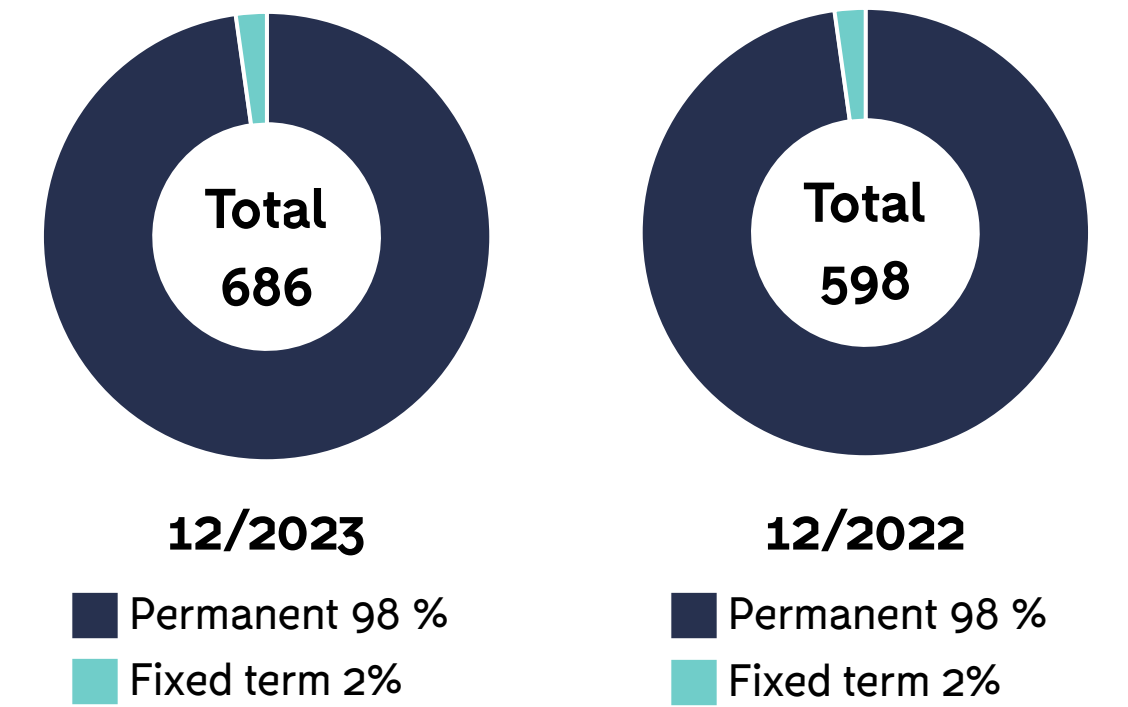## 4.3.1.1. Equal and Inclusive external workforce practices

Accountor is committed to equality and ILO Declaration of Fundamental Principles and Rights at Work. To state our ambition and to frame principles and ways of working with employees employed by Accountor vendors we defined external workforce policy. Accountor seeks to provide inclusive workplace for diverse workforce both internal and external. Accountor external policy was confirmed in August 2023 by ESG committee.

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

Headcount development 2022–2023

	12–2022	12–2023	Change %
Sweden	6	13	117 %
Finland	590	638	8 %
Total	**596**	**651**	**9 %**

Type of contract 2022–2023

Total 686

Total 598

12/2023

12/2022

■ Permanent 98 %
■ Fixed term 2 %

■ Permanent 98 %
■ Fixed term 2 %

Nature of contract 2023

■ Full time 96 %
■ Part time 3 %
■ On-request 1 %

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment
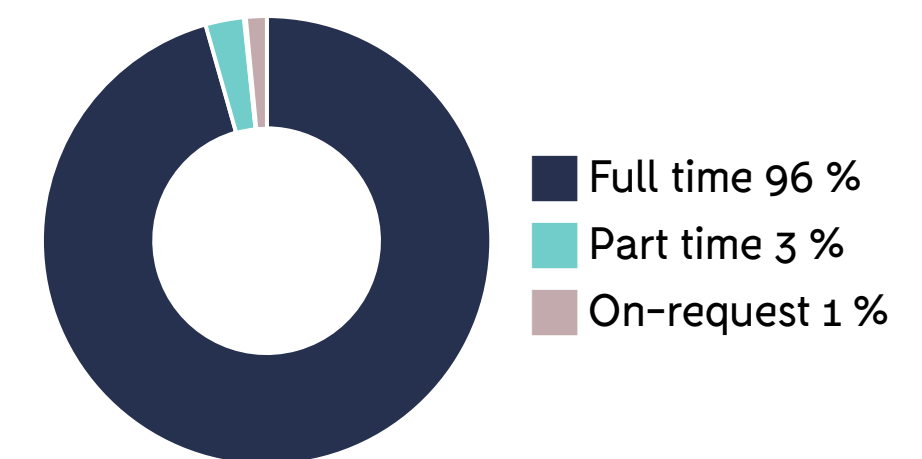
4.3.2 Collective agreements

Our compensation policy aims to provide above-market compensation level. 80% of our employments are governed by collective agreements, which define a minimum monthly salary in each job grade. In addition to base salary, Accountor employees belong to a bonus plan.

Employees' freedom of association is a norm in our operating area in Northern Europe. In line with our values, we respect our personnel's freedom of association. In our operating countries, employers are not legally allowed to collect data about the labour union membership.
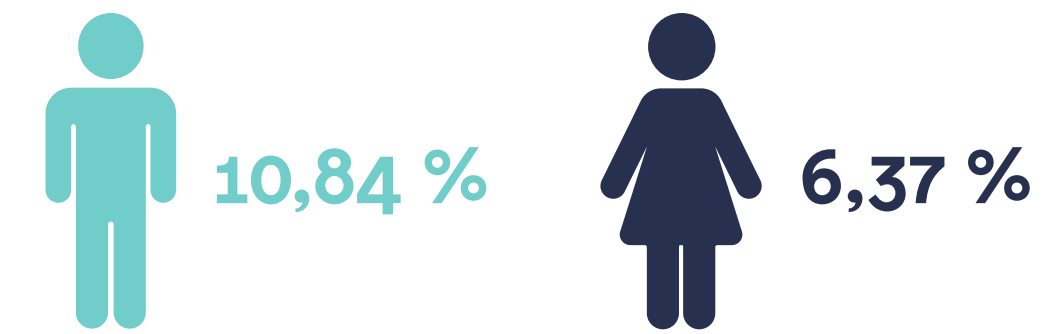
4.3.3 Length of service and employee turnover

In 2023, Accountor software business recruited 150 employees. The average length of service at Accountor is 5,02 years. (women 5,2 and men 4,8).
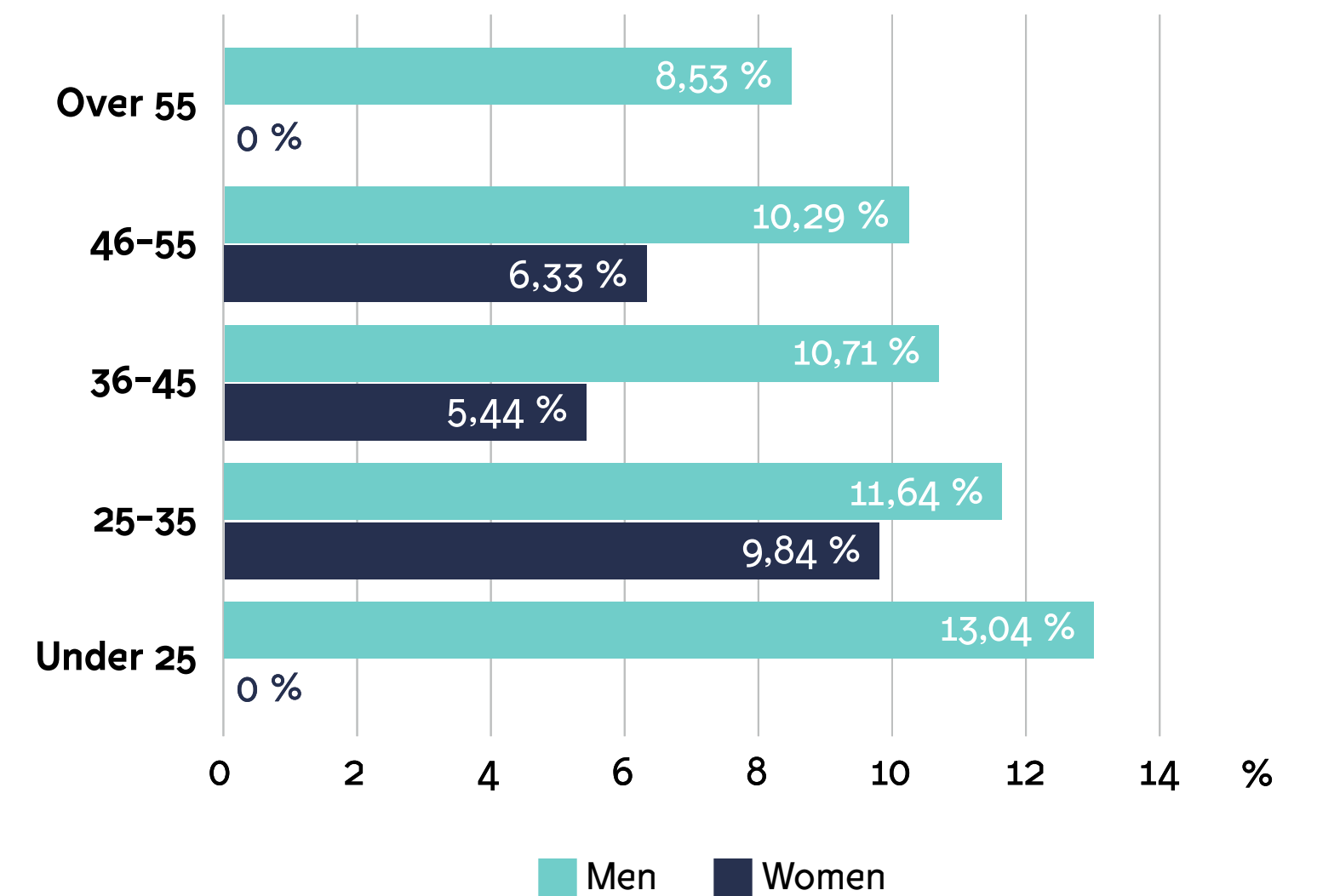
Our voluntary employee turnover percentage, meaning resignations from permanent employments, declined further to 8,59%. Employee turnover was the highest in the areas of the scarce competence availability, such as software development and capital areas of our operating countries. Accountor units have retention programs aiming to improve commitment and wellbeing to minimise employee turnover.

Our total employee engagement index is 4,03/5 or 78% of the responses positive and our eNPS (how likely our employees are to recommend Accountor as an employer) is 14,3. Typically, all numbers above zero are good. According to People First survey 79% of Accountor software business employees want to keep working for Accountor in the future.

Rate of total employee turnover by gender (%)

10,84 %   6,37 %

Rate of employee turnover by gender age group (%)

Age group	Men	Women
Over 55	8,53 %	0 %
46–55	10,29 %	6,33 %
36–45	10,71 %	5,44 %
25–35	11,64 %	9,84 %
Under 25	13,04 %	0 %

Men   Women

4.4 Inclusion and equality

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

We took actions to increase inclusion and equality with positive outcomes. We continued to enroll company-wide training programs to mitigate impacts of bias and to develop inclusion in teams. 50 managers participated during 2023 to training programs with their teams.
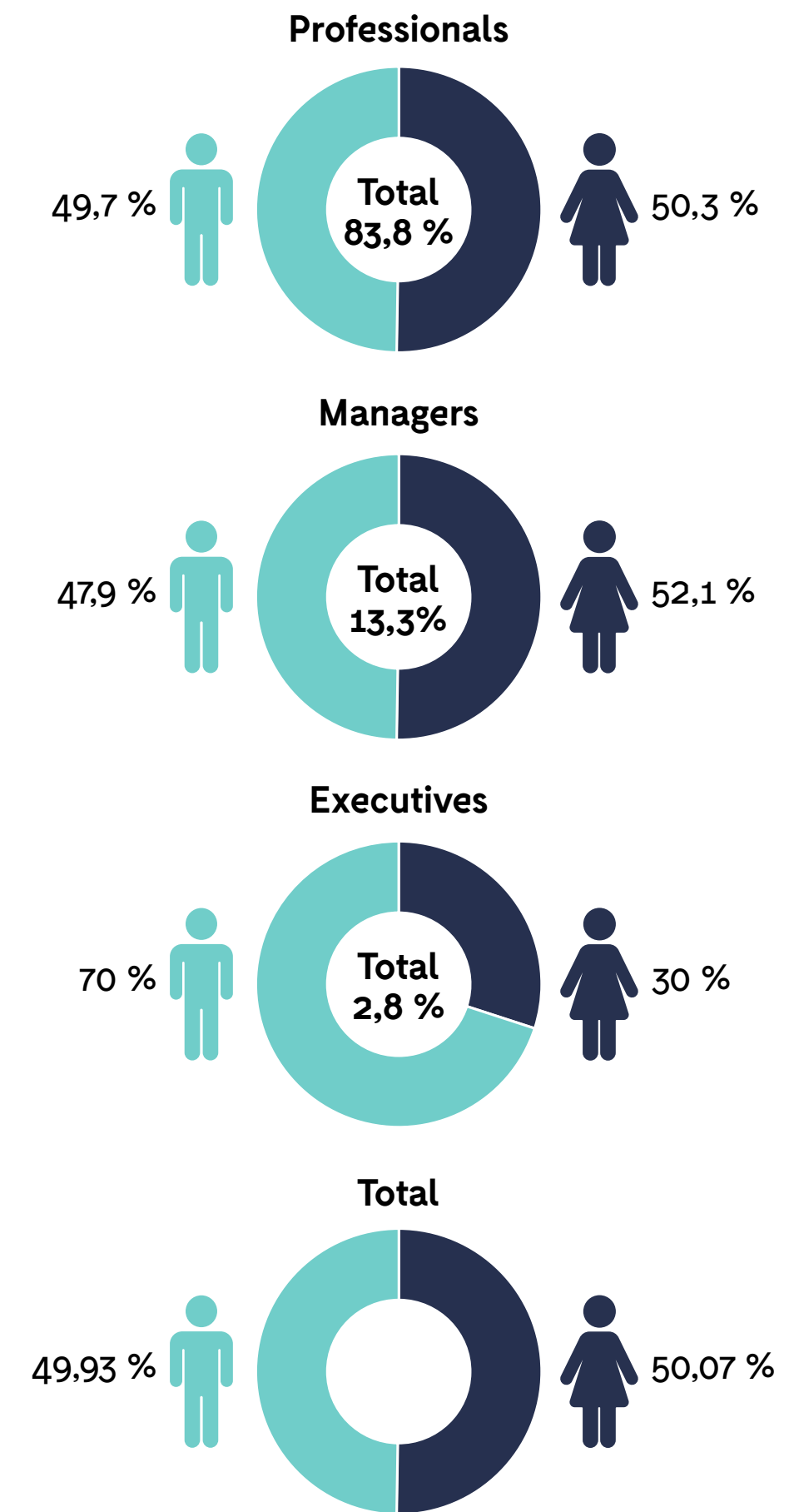
We followed our progress in inclusion and equality through our annual People First survey. We compare annually the results of people identifying as belonging to a minority with all Accountorians' and make actionplans to close the gaps of employee experience. We discovered in September 2023 that 64 employees feeling belonging to minorities had a total index of 64% positives compared to 76% of all employees. Biggest gaps were in feeling appreciated by colleagues 63% vs. 85% positives and making good use of capabilities 59% vs. 79% positives.

The gender ratio in Accountor software business is even, 50% of employees are women. The voluntary employee turnover of female employees was 6,37% and for male employees 10,8% during 2023.

We are proud that in our software business units, Financial Management Software (FMS) and Human Resources (HR), the share of women is above software business market level. Accountor focuses to decrease the gender segregation by promoting equal

Gender ratio in employee groups
(end of period)

Professionals

49,7 %   Total 83,8 %   50,3 %

Managers

47,9 %   Total 13,3%   52,1 %

Executives

70 %   Total 2,8 %   30 %

Total

49,93 %   50,07 %

a+

Accountor – forerunner in financial and HR management | Sustainability at Accountor | Sustainable governance | **People first** | Environment

Total number of new hires by gender and age group 2023

Men (total 92) Women (total 58)
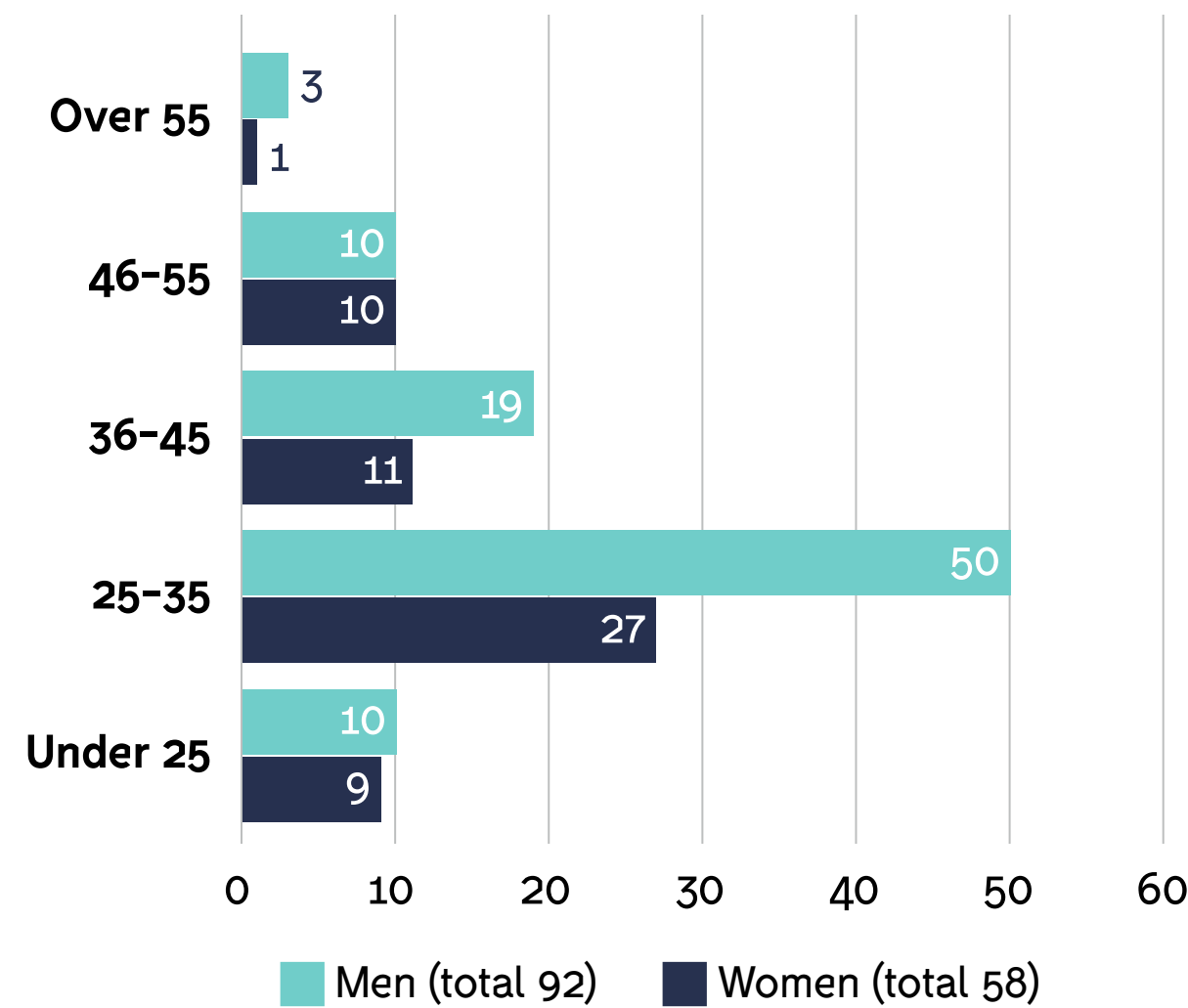
Total number of employees by gender

Under 25	6
25–35	148
36–45	108
46–55	58
Over 55	34
TOTAL	**354**

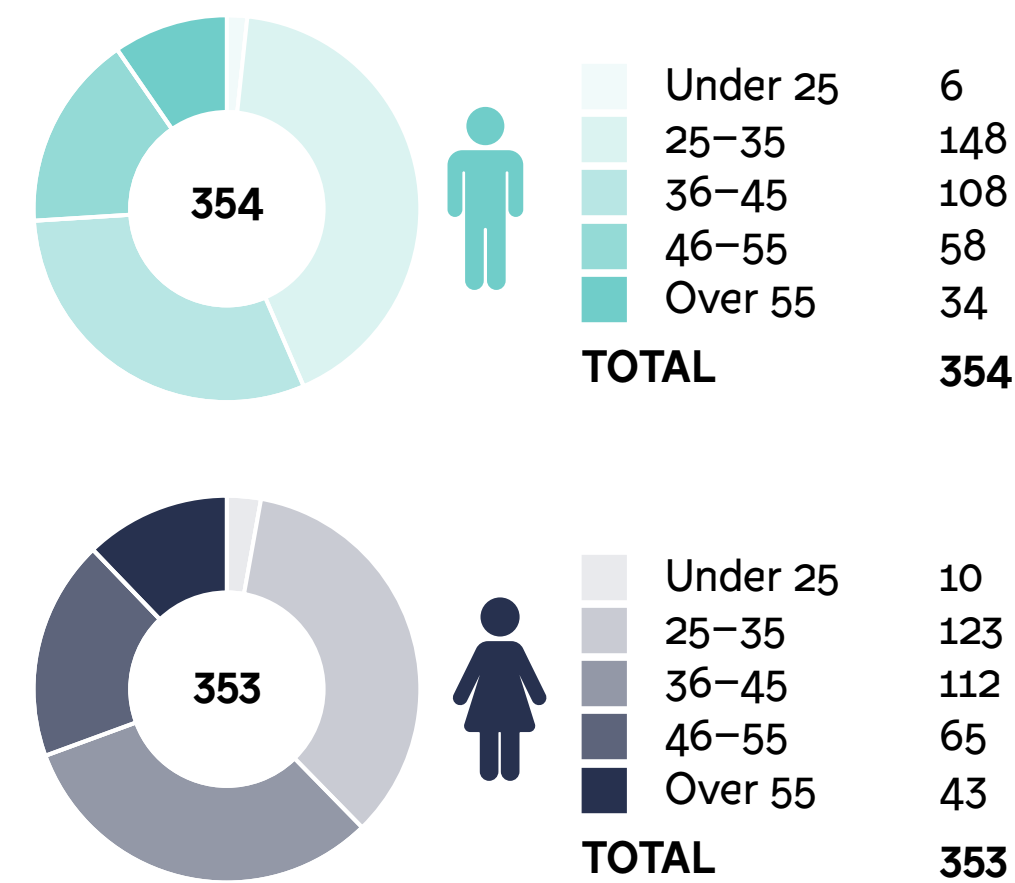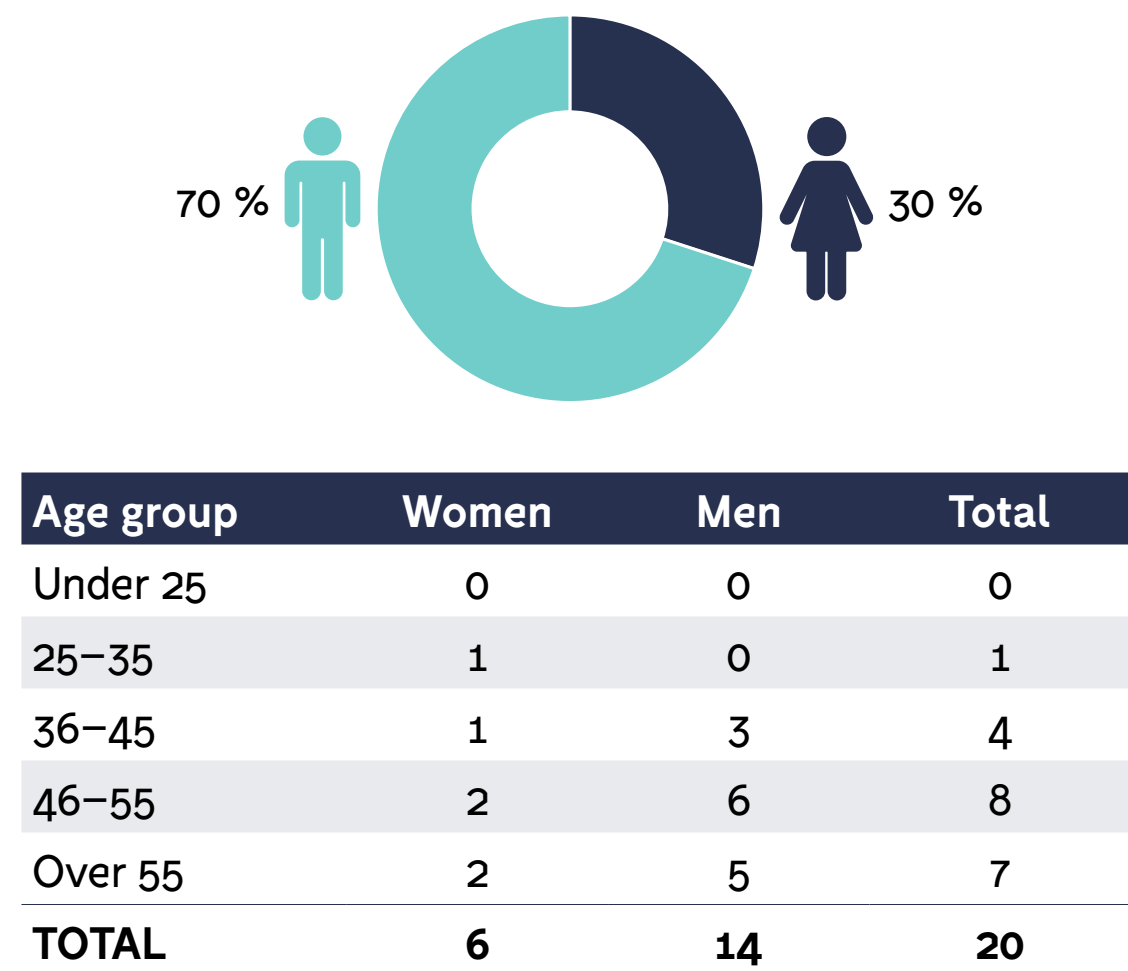|	
Under 25	10
25–35	123
36–45	112
46–55	65
Over 55	43
TOTAL	**353**

Executives by gender and age group (end of period)

70 %   30 %

Age group	Women	Men	Total
Under 25	0	0	0
25–35	1	0	1
36–45	1	3	4
46–55	2	6	8
Over 55	2	5	7
TOTAL	**6**	**14**	**20**

career development, mitigating bias in recruitment process and participating to Mimmit koodaa (women code program) activities and. We are also providing internal career paths from female dominated customer service tasks to technology and automation development related roles.

The share of women in managerial positions is 52,3% and in executive positions 30%. We aim to increase the number of women in also executive positions. Accountor's Board of Directors did not have any female members in 2023.
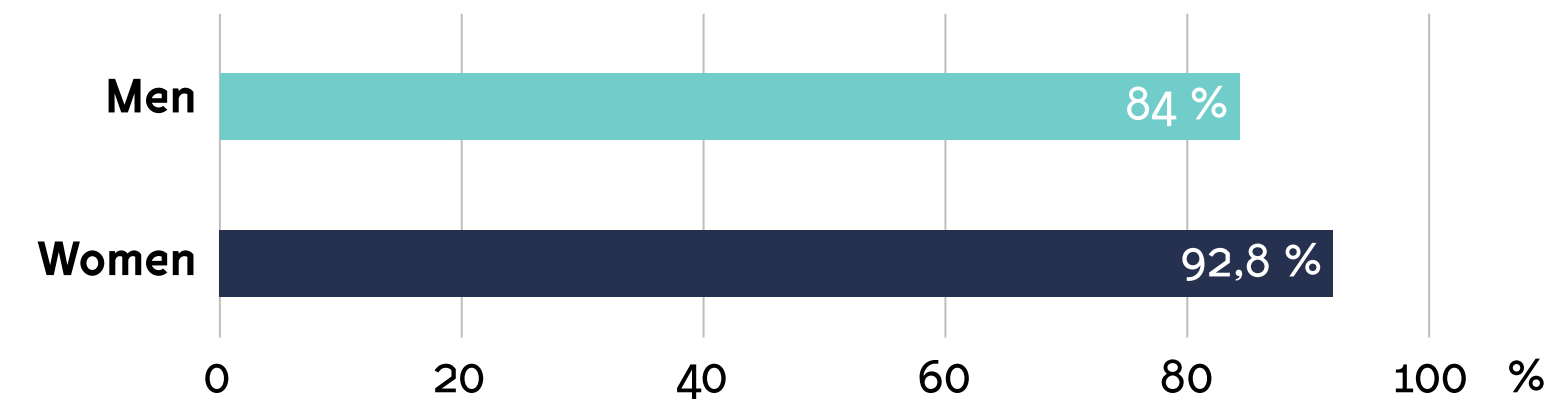
The average age of Accountorians is 40. 2,2% percent of our employees are younger than 25 and 11% are over 55 years old.

Accountor focuses on increasing diversity in recruitments. Especially new employees in older and younger age groups are well-represented. Accountor's employees in executive position (N60) and Board of Directors belong to diversed age groups.

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   Sustainable governance   **People first**   Environment

Retention rate after parental leave
Total 87,2%

Men — 84 %
Women — 92,8 %

Number of employees who returned to work after parental leave

17   Total 31   14
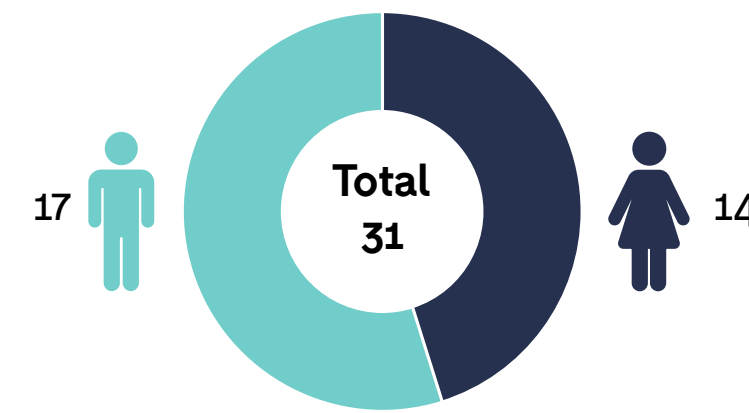
Number of employees retained for 12 months after parental leave

21   Total 34   13
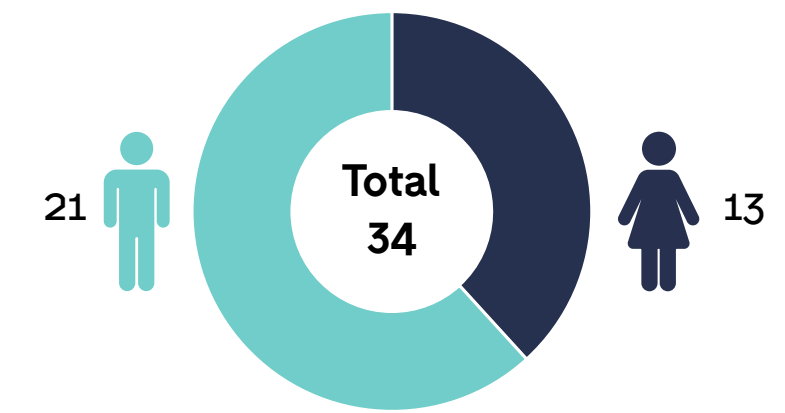
Supporting families

We operate in countries where the regulatory length of parental leaves varies from 11 months to 18 months. In addition to parental leave, Accountor offers in Finland a full salary for the first three months of parental leave for birth giving parent and 1 month full salary for the other parent. 33 Accountor employees took parental leave during 2022 and 15 of them was women.

We support our employees' return from parental leave by offering opportunities for part-time work. The retention of employees returning from parental leave after 12 months is 87% which is the same level as general Accountor retention rate.

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   Sustainable governance   **People first**   Environment

Average salaries by gender 2023
Base salary euros / month
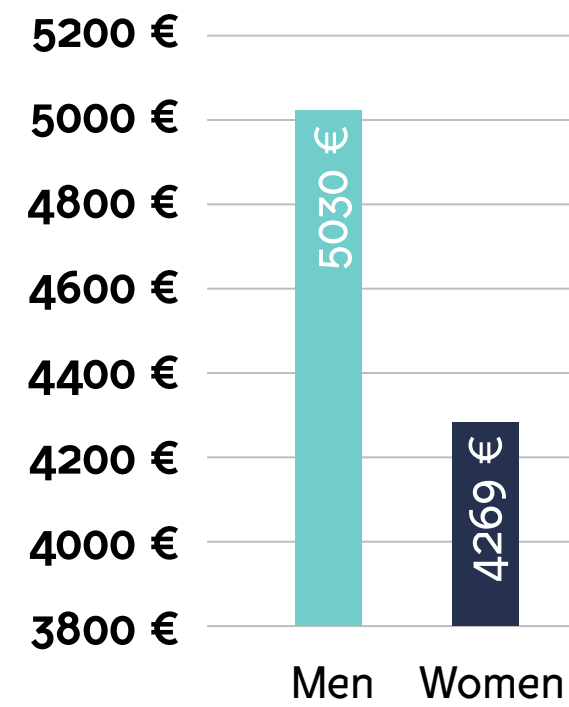
Salary ratios by gender and organisational position (%)
As a % of male gross earning

Men   Women
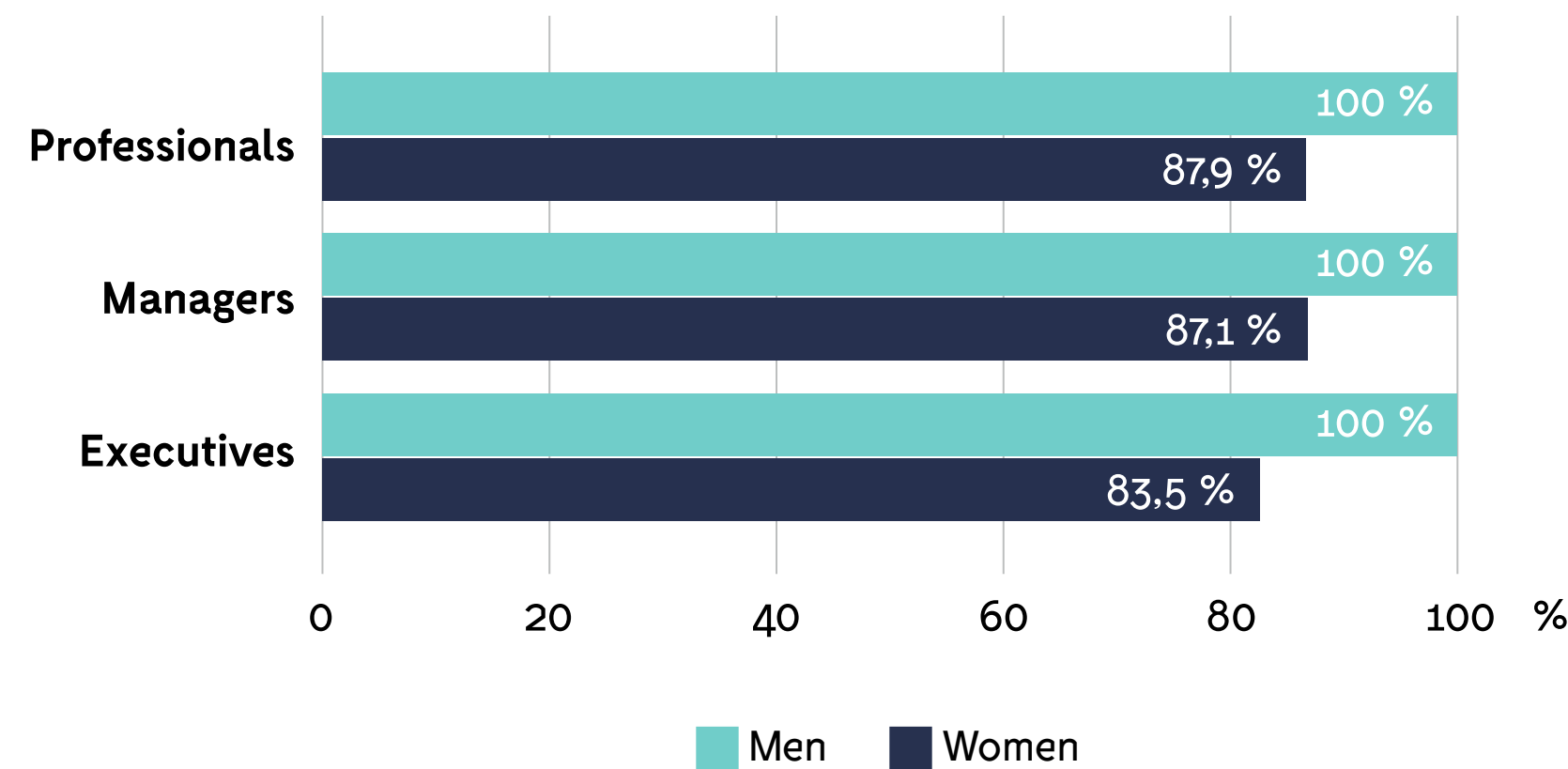
Salary ratios by gender and age at Accountor (%)
As a % of male gross earning
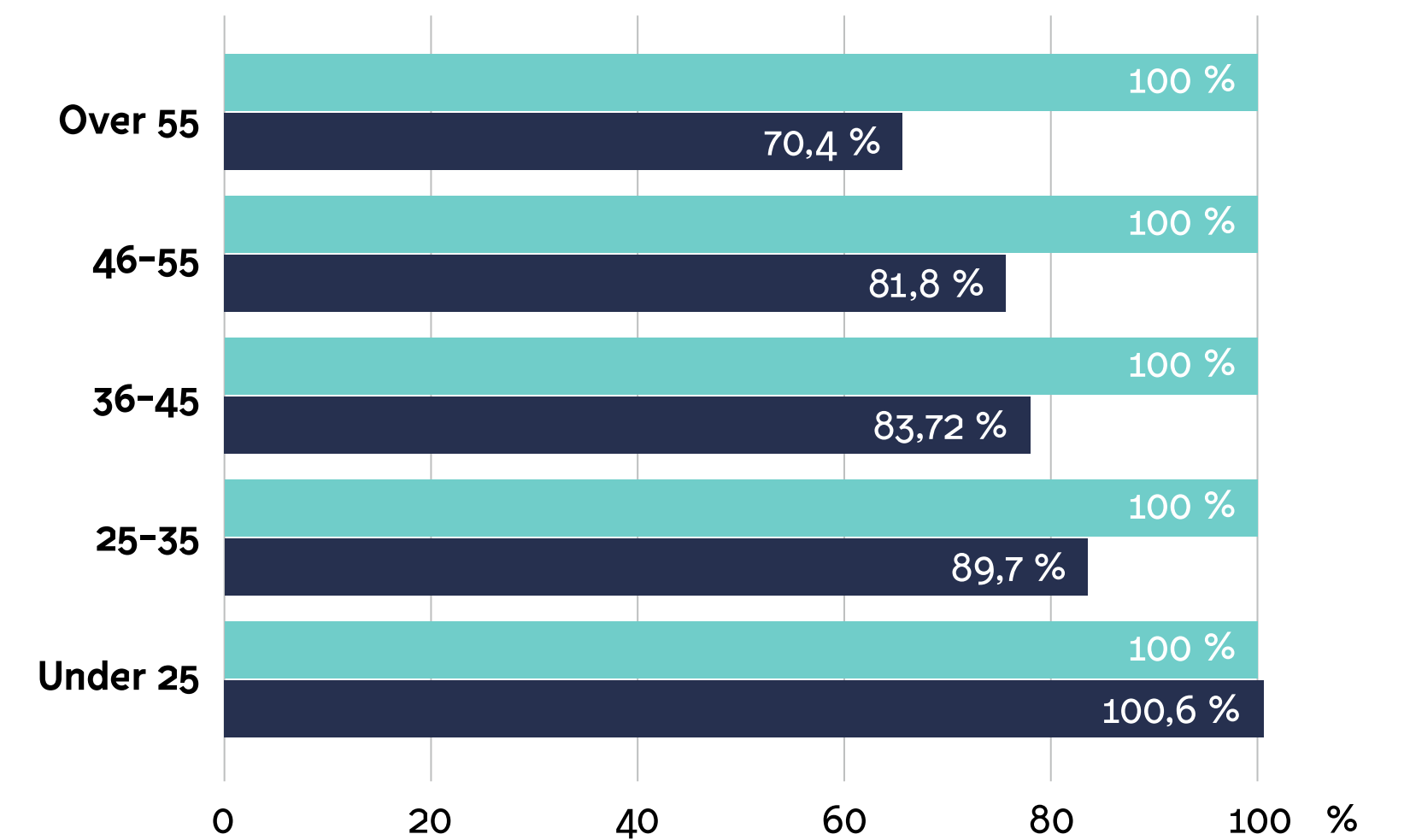
4.4.1 Motivating compensation

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

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

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

Eighty percent of our employments are governed by collective agreements, which define a minimum monthly salary. The salaries specified in the collective agreement are applied to jobs covered by the agreement, such as software developers.

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

Accountor's base salaries are higher than the minimum collective agreement minimum salary requirements. As we operate in a variety of fields, average salary is not a good indicator of salary level or structure. Moreover, salaries are influenced by years of experience as well as the cost-of-living category of the operating country or area.

In addition to their base salary, all Accountor employees are eligible for a bonus plan. Bonus payments are based on both our common financial- and team-level or individual targets, and the payments are linked to the monthly salary of the employee.

Our plan provides an opportunity to earn bonus of 0,5 to 10 months' salary depending on the employee group

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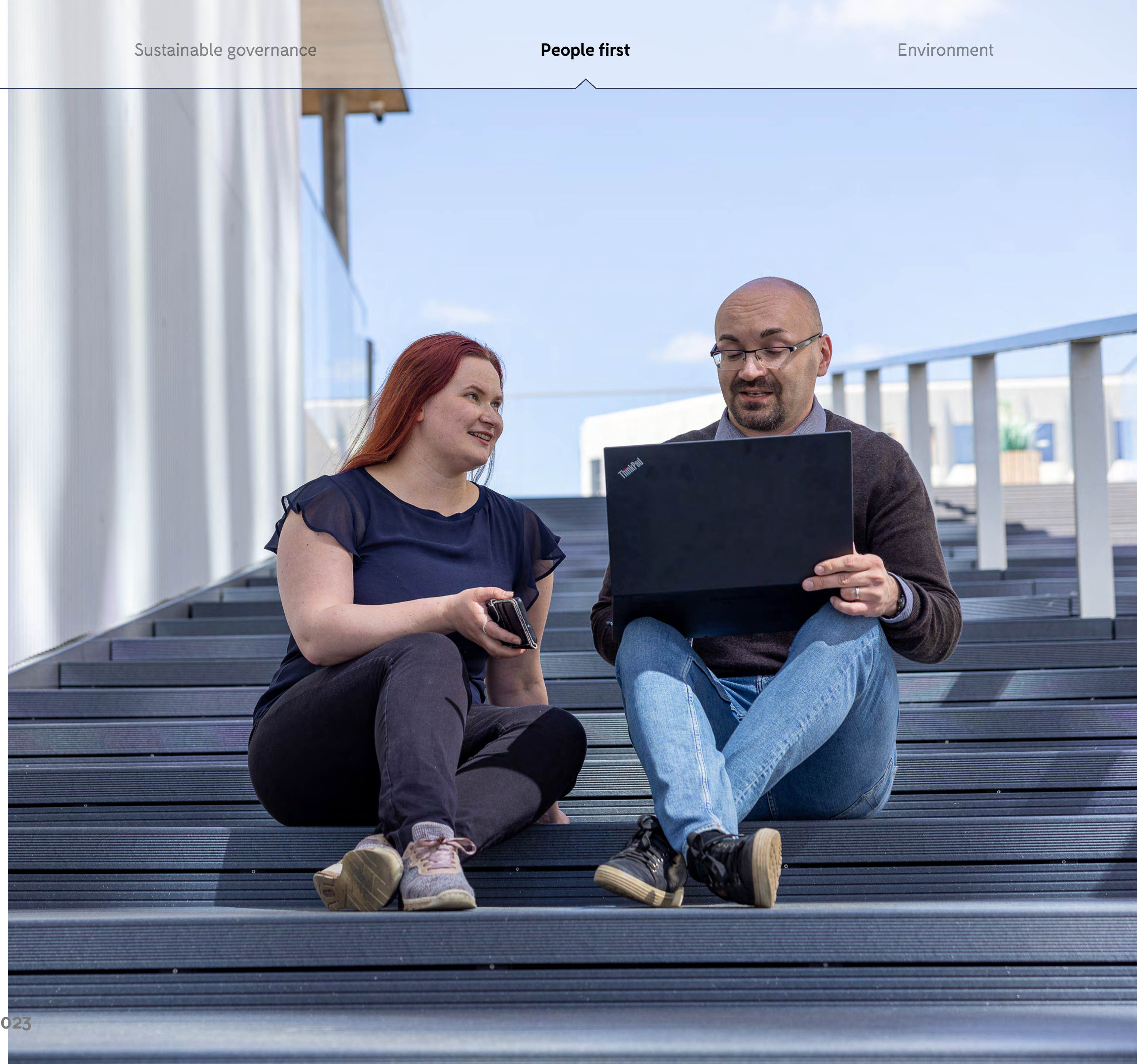
4.4.2 Executive and board remuneration

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

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

Accountor's Board of Directors develops compensation structures and review them annually, to best align them with the strategic and operational opportunities and challenges of the company, and to ensure appropriate incentives for management. When reviewing and approving annual remuneration guideline, the Board takes into consideration input from internal remuner-

ation specialists, external labour market data and employees' satisfaction to compensation.

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

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

When comparing Accountor's highest paid employee to the average employee, Accountor's highest paid individual earns 4,83 times the median earning.

The share of women in our executive positions is 30% in Accountor software business. Executive positions are defined as positions in the Leaderment Team of Accountor software units. The gender pay gap in executive positions is 16,53%. The gap is due to the male dominance in positions with profit and loss responsibility, which have higher salaries, and female dominance in director roles in support functions.

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

4.5 Wellbeing

Besides competence development and enhancing intrinsic motivation, occupational health and wellbeing are key factors in employee satisfaction. Accountor provides wide range of access to health services for employees and exceeds the legal requirement. Accountor employees have unlimited access to health services except dental care.

In addition to extensive occupational health care services, Accountor provides online break exercises and a mental wellbeing hotline for all employees to ensure wellbeing.

4.5.1 General wellbeing and development of occupational health and safety

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

Accountor has a policy and practice to provide above mandatory occupational health and wellbeing services to all employees. This is achieved in close collaboration with local occupational health care service providers.

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

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

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

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

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

The sick leave percentage at Accountor decreased from to 3,68% 2022 from to 2,98% during 2023.

The accident frequency rate for Accountor was 2,24*. The accidents are connected to commuting. We have never experienced fatal accident.

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

* Accident frequency rate: number of lost time accidents x 1,000,000 / number of hours worked.
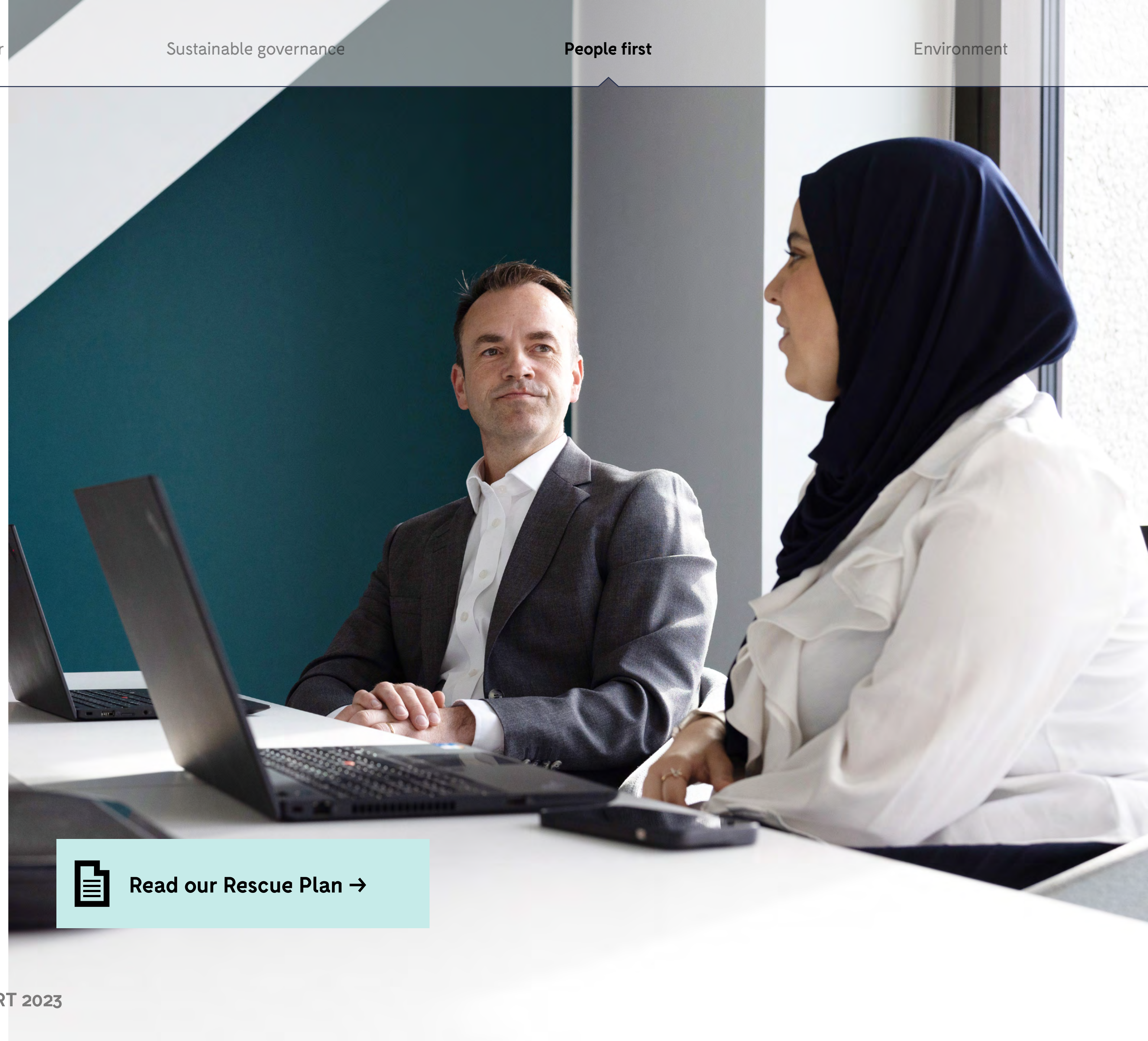
📄 **Read our Rescue Plan →**
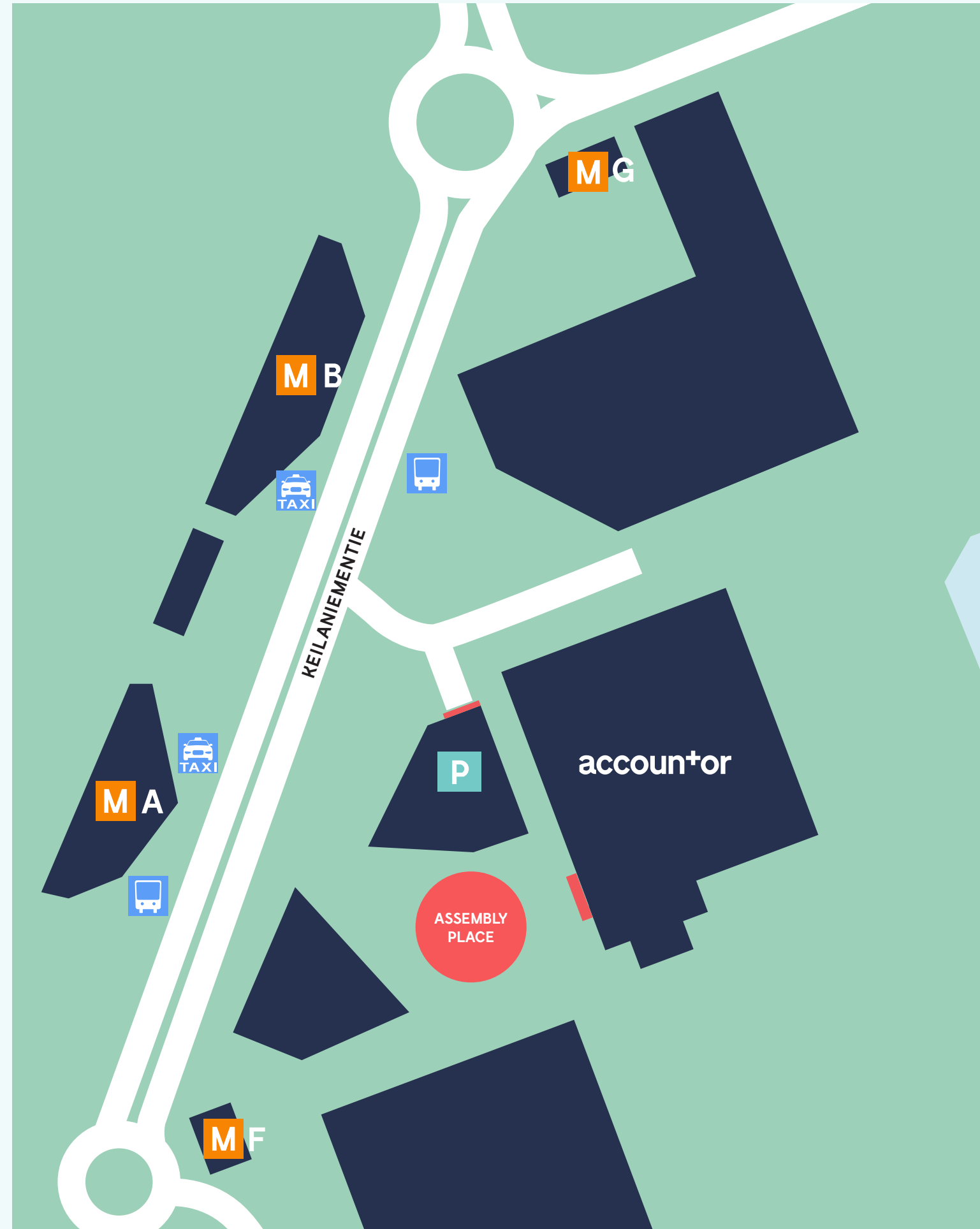
Security Services

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

Rescue

- ● You can find the Accountor Tower rescue plan at: Accountor Tower rescue plan

Surveillance cameras

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

First aid

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

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

4.5.2 Protecting employees from harrassment

Accountor targets to provide psychologically safe working environment. To keep our employees safe we are following up anonymously experienced bullying and harrashment in People First survey and recognizing whether harassment is by external or internal contact. Accountor is offering additional specialized support service Someturva for employees to solve on-line harassment or bullying situation efficiently. During 2023 5 employees seeked help during Someturva. We also recognized 5 cases of harassment or bullying of which 80% are solved in end of March 2024.

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

According to the anonymous People First survey, the early intervention is efficient. In the 2023 survey, five cases were mentioned in software business units and in the end of 2023, four of them were resolved and one in progress towards resolution. The remaining cases could not be solved due to anonymity.

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

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

4.5.3 The a+ hybrid working model

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

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

All our employees have a dedicated local office where they can choose to work within the a+ hybrid model in a safe and functional manner and benefit from occupational

health services and other support. In 2023, satisfaction in remote work was rated at 4,44/5, or 86% of the employees were rating positive.

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

The satisfaction concerning the functionality of our physical premises in 2023 was rated positively by respondents in 58% of the cases which is 18% points lower than the generic international benchmark for white collar work.

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment
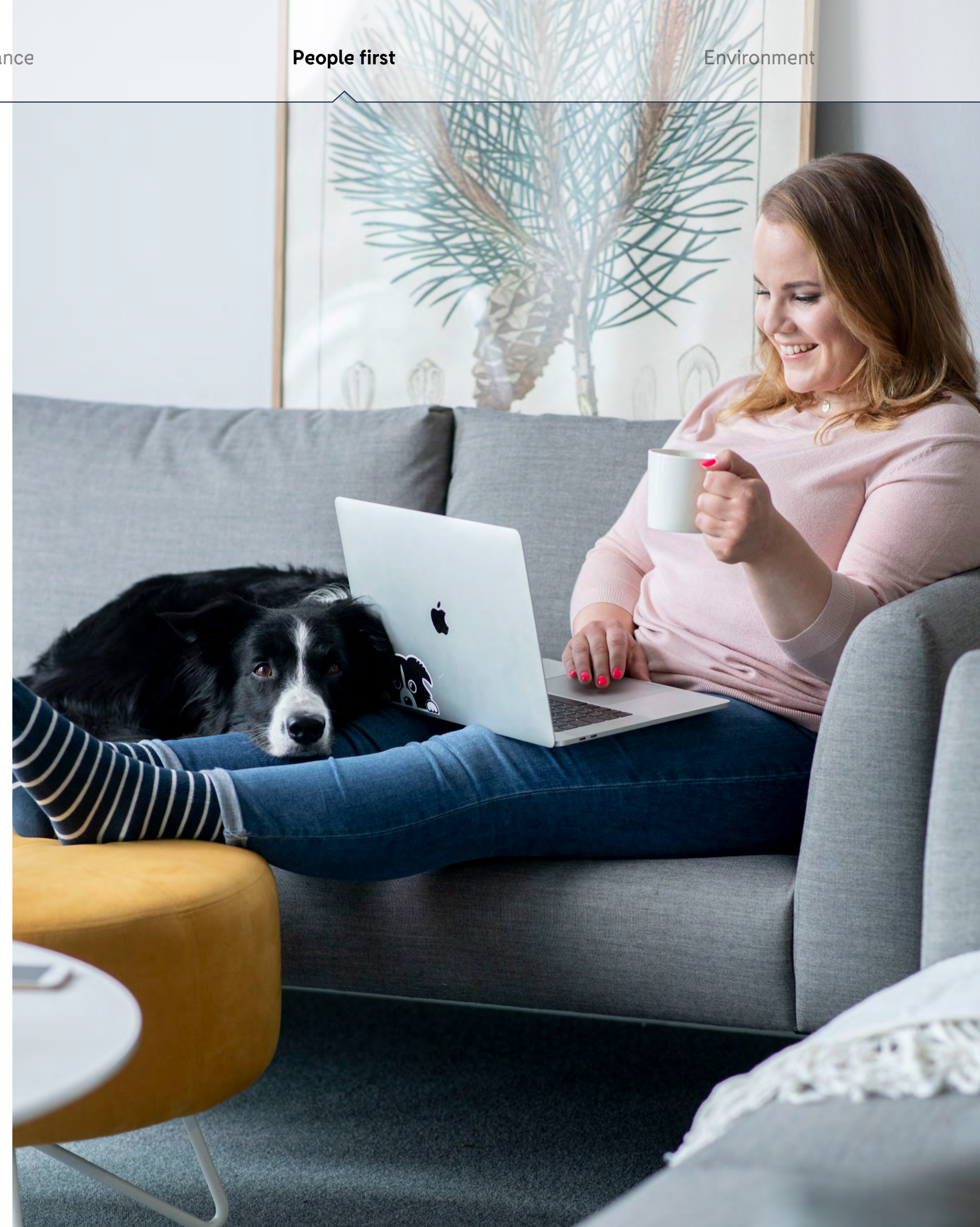
4.6 Customers' wellbeing

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

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

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

Accountor's customer promises

1. Delivered one time, on time.

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

2. Expertise close to you.

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

3. Committed to active and clear communication.

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

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment

4.7 Giving back to the society

As a considerable employer, especially in Finland where we have approximately 1500 employees, we support United Nation's Sustainability Development Goal number 8 of decent work and economic growth for our employees. In addition, our business affects the same topics for SDG 8 by providing economic growth and decent work to our customers and their employees.

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

Accountor Impact Day

We feel obliged to support and give back to society in various ways. In 2023, we offered Accountorians a possibility to use working time for voluntary charity work. We called all the activities Accountorians did as Accountor Impact Day.

During Accountor Impact Day, Accountorians carried out different good deeds that benefit people, companies, the society, or the world we live in. Teams and individuals used 115 hours

in different ways, including being a friend to an immigrant family, serving food at a Red Cross food aid, making Valentine's Day cards for people with disabilities, and many more.

In addition, we have offered the data in our systems — in a secure and anonymised way — to help Finnish government and society in the current unstable financial situation with regular financial state analyses.

a+

05 Environment

5.1 Our environment in brief

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

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

We are committed to reducing our carbon emissions consistently and comply fully with applicable environmental regulation, contractual requirements and recognised good practice in our activities. We pride in maintaining zero environmental penalties.

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

5.2 Climate work and carbon footprint

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

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

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

We continued our carbon inventory by applying Global Greenhouse Gas (GHG) protocol in collaboration with global vendor, Climate Partner. In 2023 we calculated our Scope 1,2 and 3 greenhouse gas (GHG) emissions.

Scope 1 – fuel consumption
Our group Scope 1 emission sources consist of our company cars. Accountor's software business does not own any company cars.

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

For these reasons our Scope 1 emissions are non-existent for software business.

a+

Accountor – forerunner in financial and HR management   Sustainability at Accountor   Sustainable governance   People first   **Environment**

Scope 2 – purchased energy

Our a+ Hybrid working model helps to reduce greenhouse gas emissions by reducing our need for office space. Hybrid working and use of renewable energy provide the biggest opportunities to cut our carbon Scope 2 indirect energy use emissions further. At the end of 2023, Accountor had about 9 500 m² of office space in two countries. Our offices provide diverse zones to match the nature of tasks and ensure a sustainable use of space to restrict our greenhouse gas emissions. Our a+ Hybrid working model helps to reduce greenhouse gas emissions by reducing the need to commute as well as reducing the office space second year a row, and this year by 4500 m² (over 10% reduction from previous year's office space).

In 2023 we collected more specific information about our energy consumption from our biggest offices in our operating locations. We have been able to increase the amount of guarantee of origin certificates on renewable emission use at our offices. Scope 2 emissions resulted in 12% of total CO_2 footprint.

Scope 3

To build a foundation for further improvement of our Scope 3 calculations, we collected activity-based data from various sources. Scope 3 emissions resulted in 88% of total CO_2 footprint.

Category 1 – Purchased goods and services

Our CO_2 calculation on purchased goods and services does not yet cover our procured items in full. At this stage, the main part of our Scope 3 Cat.1 emissions derives from external data centre services and from the hardware devices in use.

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

Category 3 – Fuel- and energy-related activities

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

Software business Scope 3 footprint breakdown (tCO₂)

■ Business travel total	93,3
■ Devices and data center	124,0
■ Upstream	187,6
■ Commuting	426,2
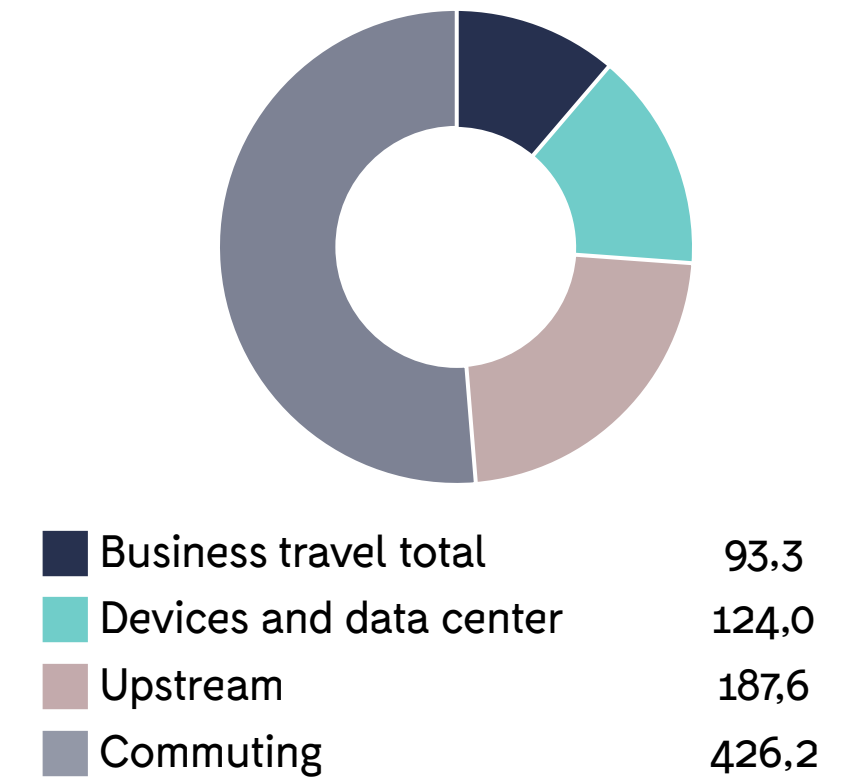
Software business Scope 3 tCO₂ emissions per office

■ Espoo	543,1
■ Tampere	149,5
■ Turku	257,8
■ Jyväskylä	51,0
■ Other Finland	21,6
■ Sweden	8,2

a+

Accountor – forerunner in
financial and HR management

Sustainability at Accountor

Sustainable governance

People first

Environment
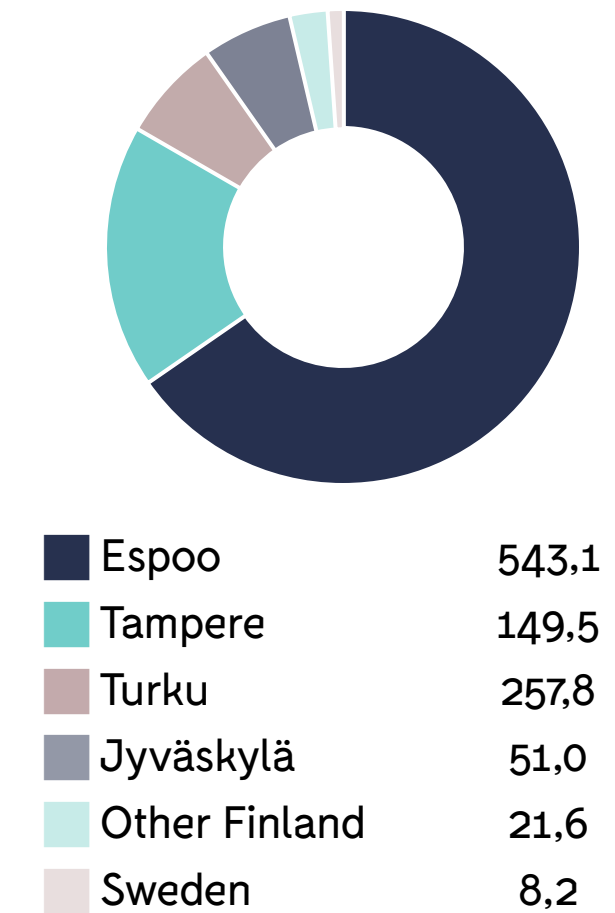
Category 6 – Business travel

Accountor promotes its employees to consider the necessity of a business trip in each case before choosing to travel. We encourage to organise meetings in an eco-friendly and cost-effective way. Conference call equipment and software is widely available at all Accountor offices, and most meetings and negotiations can be done virtually.

Business travelling reporting was continued as before. We collect flight, train, taxi and other public transport data from our own systems and from our travel agency to measure our business travel carbon footprint.

Category 7 – Employee commuting

We re-executed commuting survey for all employees to closely examine our ways of commuting to work. The main results from the survey stated that a third of Accountorians drive to work, and the proportion of e-car users is six percent. Most of Accountor employees commute to the office two days a week. The a+ Hybrid office strategy requires new premises to be accessible by public transportation.

We have set a target to cut carbon emissions per full-time employee (FTE) every year with 10% between 2020 and 2026. During 2023, our carbon footprint was 1,4 tCO_2 per FTE based on 667 FTEs. The footprint corresponds to 17% of average European person's carbon footprint of 8,7 tCO_2.

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

Corporate Carbon Footprint, tCO_2

	2023
Espoo	583,85
Tampere	189,31
Turku	65,14
Jyväskylä	63,46
Other FI	32,54
Stockholm	8,59

Software business tCO_2 footprint 2023
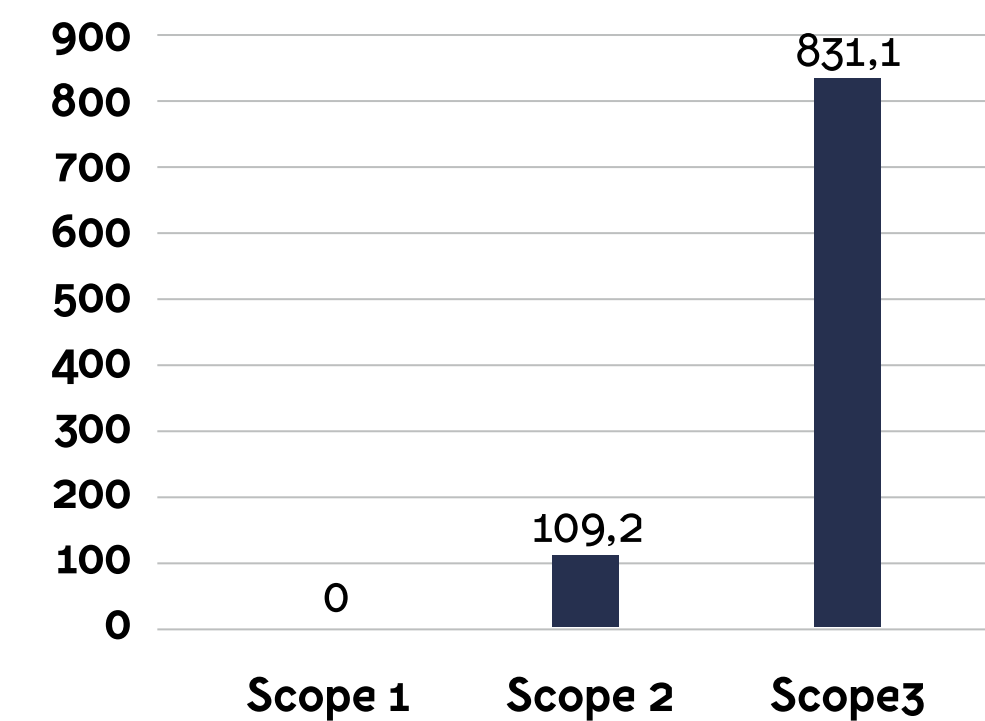
	Espoo	Tampere	Turku	Jyväskylä	Other FI offices	Stockholm	All	%
Scope 2								**12 %**
Heat (purchased)	40,8	28,3	6,0	8,3	4,0	0,0	87,4	
Purchased cooling	0,0	0,0	0,0	0,0	0,2	0,1	0,3	
Electricity (stationary)	0,0	8,6	1,4	4,2	6,9	0,4	21,5	
Scope 3								**88 %**
Employee Commuting	170,5	56,9	22,9	12,1	9,1	1,5	273,1	
Home office	96,5	24,3	12,4	13,5	3,2	3,1	153,1	
Upstream emissions cooling	73,6	0,0	3,0	0,0	2,0	1,3	79,9	
Upstream emissions heat	73,1	13,5	2,9	4,0	1,9	0,4	95,8	
Upstream emissions vehicle fleet	2,8	2,3	0,0	0,6	0,0	0,0	5,6	
Upstream emissions electricity	2,1	1,7	0,3	0,8	1,2	0,2	6,3	
Electronic devices	67,5	32,3	9,0	11,0	2,3	0,6	122,7	
External data centre	1,4	0,0	0,0	0,0	0,0	0,0	1,4	
Rental and private vehicles	29,4	9,7	3,9	4,8	1,0	0,5	49,2	
Flights	18,9	6,3	2,5	3,1	0,6	0,3	31,6	
Hotel nights	5,3	1,7	0,7	0,9	0,2	0,2	8,9	
Rail	2,2	0,7	0,3	0,4	0,1	0,0	3,6	
Overall results	**583,9**	**189,3**	**65,1**	**63,5**	**32,5**	**8,6**	**942,9**	
% of all emissions	61,9 %	20,1 %	6,9 %	6,7 %	3,5 %	0,9 %		

a+

06 Appendices

Appendix 1: GRI and ESRS Content Index

We have reported the information cited in this GRI–ESRS content index for the period FY 2023 with reference to the GRI standards, UN SDGs and partial reference to ESRS.

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

(*partial compliance)

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

(*partial compliance)

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

(*partial compliance)

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

(*partial compliance)

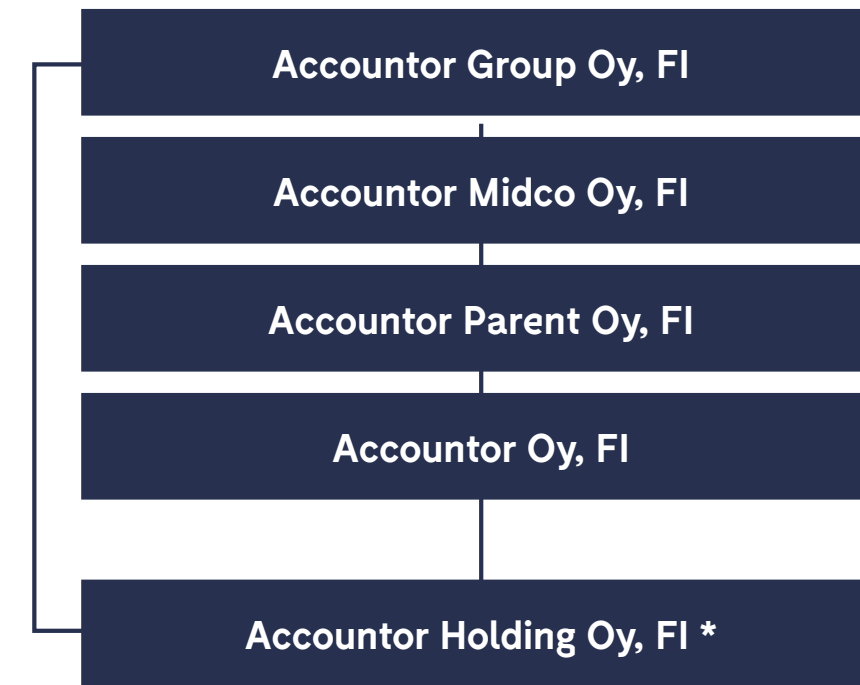| GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI 305: Emissions		305-1	Direct (Scope 1) GHG emissions	ESRS E1 E1-4 §34 (c); E1-6 §44 (a); §46; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; AR §43 (c) to (d)	5.2 Carbon footprint		
GRI 305: Emissions	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

(*partial compliance)

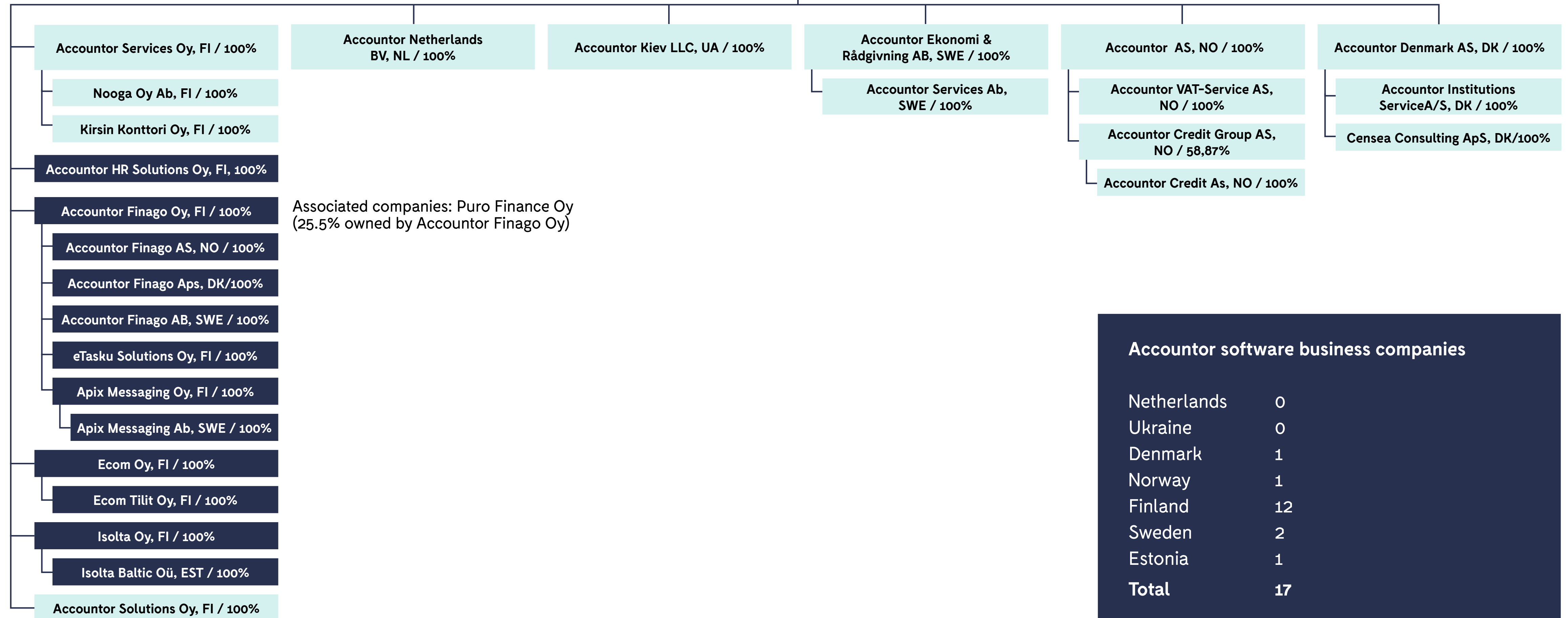| GRI Standard	Section	Code	Indicator	ESRS reference*	Location	SDG	Additional information
GRI 402: Labor/ Management Relations		402-1	Minimum notice periods regarding operational changes	Social dialogue' and 'Collective bargaining' are sustainability matters for S1 covered by ESRS 1 §AR 16. Hence this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

(*partial compliance)

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

(*partial compliance)

Appendix 2: Accountor structure

At the end of the year 2023, Accountor software business consists of 17 companies, five of which are Holding companies. In this report we cannot specify the differences between the list of entities included in our financial reporting and the list included in this sustainability report, because it is not public information.

Accountor Group Oy, FI

Accountor Midco Oy, FI

Accountor Parent Oy, FI

Accountor Oy, FI

Accountor Holding Oy, FI *

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

Accountor Services Oy, FI / 100%
- Nooga Oy Ab, FI / 100%
- Kirsin Konttori Oy, FI / 100%

Accountor Netherlands BV, NL / 100%

Accountor Kiev LLC, UA / 100%

Accountor Ekonomi & Rådgivning AB, SWE / 100%
- Accountor Services Ab, SWE / 100%

Accountor AS, NO / 100%
- Accountor VAT-Service AS, NO / 100%
- Accountor Credit Group AS, NO / 58,87%
- Accountor Credit As, NO / 100%

Accountor Denmark AS, DK / 100%
- Accountor Institutions ServiceA/S, DK / 100%
- Censea Consulting ApS, DK/100%

Accountor HR Solutions Oy, FI, 100%

Accountor Finago Oy, FI / 100%
- Accountor Finago AS, NO / 100%
- Accountor Finago Aps, DK/100%
- Accountor Finago AB, SWE / 100%
- eTasku Solutions Oy, FI / 100%
- Apix Messaging Oy, FI / 100%
- Apix Messaging Ab, SWE / 100%

Associated companies: Puro Finance Oy (25.5% owned by Accountor Finago Oy)

Ecom Oy, FI / 100%
- Ecom Tilit Oy, FI / 100%

Isolta Oy, FI / 100%
- Isolta Baltic Oü, EST / 100%

Accountor Solutions Oy, FI / 100%

Accountor software business companies

Netherlands	0
Ukraine	0
Denmark	1
Norway	1
Finland	12
Sweden	2
Estonia	1
Total	**17**