



PwC Finland's Corporate Responsibility Review

2024





Content

Introduction	3
1 General information	5
1.1 Basis for preparation	5
1.2 Governance	5
1.3 Strategy	8
1.4 Impact, risk and opportunity management	11
1.4.1 Materiality assessment process	11
2. Environmental disclosures	18
2.1. ESRS E1 Climate change	18
2.1.1. Climate change strategy	18
2.1.2. Impact, risk and opportunity management	18
2.1.3. Metrics and targets	19
3. Social disclosures	25
3.1. ESRS S1 Own workforce	25
3.1.1. Impact, risk and opportunity management	25
3.1.2. Metrics and targets	29
3.2. Taxes	34
3.2.1. Impact, risk and opportunity management	34
3.2.2. Metrics and targets	35
3.3. ESRS S4 Consumers and end-users	36
3.3.1. Impact, risk and opportunity management	36
4 Governance information	39
4.1. ESRS G1 Business conduct	39
4.1.1. Impact, risk and opportunity management	39
4.1.2. Metrics and targets	40



PwC Finland Corporate Responsibility Review 2024

Introduction

Companies' reporting is subject to completely new expectations and requirements since the entry into force of the EU Corporate Sustainability Reporting Directive (CSRD). In Finland, sustainability reporting obligations have been incorporated into national legislation. Sustainability data is reported in a standardised format in accordance with the European Sustainability Reporting Standards. With the new regulation, sustainability reporting will become as significant as financial statements reporting, and neither of them can be assessed completely separately any longer. The quality and reliability of statutory sustainability data is assured by an independent sustainability auditor.

The statutory sustainability reporting obligation will apply to PricewaterhouseCoopers Oy (PwC Finland) from the financial period beginning on 1 July 2025. The Corporate Responsibility Review now published for the financial period 1 July 2023 to 30 June 2024 does not yet aim to meet all the requirements concerning sustainability reporting, although the review presents information about the firm's material sustainability topics, applying the structure and general principles of the European Sustainability Reporting Standards. As the transition to statutory sustainability reporting requires a great deal of work, the development of reporting has been started on a front-loaded and voluntary basis. The development work carried out for this report forms the basis for statutory sustainability reporting.





General information

Content

1 General information	5
1.1 Basis for preparation	5
1.2 Governance	5
1.3 Strategy	8
1.4 Impact, risk and opportunity management	11
1.4.1 Materiality assessment process	11

1 General information

1.1 Basis for preparation

BP-1: General basis for preparation of sustainability statements

This corporate responsibility review has been prepared for the financial period 1 July 2023 to 30 June 2024 of PwC Finland. The sustainability information presented in the report covers information about PwC Finland's own operations and, where applicable, sustainability matters in the upstream and downstream value chain. The report has been prepared applying the structures and principles of the European Sustainability Reporting Standards (ESRS).

The sustainability topics reported are based on PwC Finland's double materiality analysis, which was carried out in late 2023. The sustainability topics material for the firm's own operations, value chain and stakeholders have been identified and selected based on the materiality analysis, in addition to the related disclosure requirements and data points. The material topics and sustainability targets based on the materiality analysis were approved by the firm's Board of Directors in December 2023.

BP-2: Disclosures in relation to specific circumstances

This report describes the priorities and results of PwC Finland's corporate responsibility work. The development work carried out for the report forms the basis for statutory sustainability reporting, the scope of which covers the firm from the financial period 1 July 2025 to 30 June 2026.

Time horizons

The report follows the time horizons defined by the ESRS standards. The short term refers to the upcoming financial period, the medium term to the next 1–5 years after that, and the long term to a period of more than 5 years.

Value chain estimation, sources of estimation and outcome uncertainty

The information in the report has mainly been collected from PwC Finland's own operations and is based on the existing operating principles and policies of the PwC network and PwC Finland, the measures and targets related to their implementation, and verifiable primary input data. Some of the GHG emissions data presented in the report has been estimated using indirect data sources. Information about the use of estimates is provided in conjunction with the information presented. The estimation uncertainty is particularly related to the calculation of the greenhouse gas emissions of the value chain due to the inherent limitations of the input data.

Changes in preparation or presentation of sustainability information

The report has been prepared applying the structures and principles of the European Sustainability Reporting Standards (ESRS). Compared with previous corporate responsibility reviews, the changes are related to the structure of the report and the presentation of key figures in particular.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

Tax information has been reported in accordance with the Global Reporting Initiative (GRI) standard GRI 207: Tax, to the extent applicable to our operations.

1.2 Governance

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

Information about the composition of the firm's administrative, management and supervisory bodies, and the diversity of their members:

Composition of the board and diversity of its members

Composition and gender distribution

	Male		Female		Other		Not Disclosed		Total
	people	%	people	%	people	%	people	%	people
Number of executive members	5	71%	2	29%	0	0%	0	0%	7
Number of non-executive members	0	0%	0	0%	0	0%	0	0%	0
Total members	5	71%	2	29%	0	0%	0	0%	7

Other information on the diversity of board members		
Board's gender diversity ratio (ratio of female to male members)	ratio	0.4
Percentage of independent board members	%	0

Diversity of executive team members									
Composition and gender distribution									
	Male		Female		Other		Not disclosed		Total
	people	ratio	people	ratio	people	ratio	people	ratio	people
Total members	4	50%	4	50%	0	0%	0	0%	8

Other information on the diversity of executive team members		
Gender distribution of the executive team (ratio of female to male members)	ratio	1

Until 11 October 2023, the members of the Board of Directors were Markku Launis, Kimmo Vilske, Panu Vänskä, Sari Elonheimo, Samuli Perälä, Martti Virolainen and Janne Rajalahti (Chair).

At the Annual General Meeting held on 11 October 2023, Janne Rajalahti, who continued as Chair, Elina Kumpulainen, Kimmo Vilske, Markku Launis, Panu Vänskä, Samuli Perälä and Sari Elonheimo were elected to the Board of Directors.

Throughout the financial period, the Territory Leadership Team consisted of Kauko Storbacka (Chair), Tytti Bergman, Ylva Eriksson, Markku Hakkarainen, Pasi Karppinen, Anne Launis, Kimmo Nieminen and Kati Tammilehto.

PwC Finland is managed by its general meeting, Board of Directors and CEO, assisted by the Territory Leadership Team, shareholder and partner meetings, the partners' committee, and the nomination committee. The management principles are defined in the rules of procedure for each administrative body.

General meeting

The general meeting makes the decisions stipulated by the Limited Liability Companies Act. It also selects the Board members and the auditor and determines their remuneration. In addition, the current price of the share, the financial statements and the Board of Directors' report are confirmed. The general meeting will select the auditor of the sustainability reporting and verify the sustainability report included in the Board of Directors' report when sustainability reporting is statutory for the firm for the financial period beginning on 1 July 2025.

PwC Finland's Board of Directors

The Board of Directors is responsible for the firm's management and the appropriate organisation of its operations. The Board of Directors also ensures that the firm's accounts and supervision of finances are arranged appropriately. In addition, the Board of Directors approves the business strategy, business plan and budget, and monitors their execution. The Board of Directors appoints the CEO and approves the appointment of

the business area managers and the members of the Territory Leadership Team.

The Board of Directors works in accordance with its rules of procedure that detail the Board's duties and the annual planning cycle. Owing to the position of the firm, the majority of the ordinary members and deputy members of the Board of Directors, as well as its Chair, must be accountants working at the firm.

The Board will be responsible for the statutory sustainability report.

The Board has access to the expertise of the sustainability experts employed by the firm. During the financial period that ended on 30 June 2024, 29% of the members of the Board of Directors were authorised sustainability auditors approved by the Finnish Patent and Registration Office.

CEO

PwC Finland's CEO is responsible for leading the firm's business operations and managing its administration in accordance with the Limited Liability Companies Act and the instructions of the firm's Board of Directors.

The CEO is responsible for leading the firm, implementing its strategy, and developing the business in accordance with the Limited Liability Companies Act and the instructions of the firm's Board of Directors. The CEO is assisted by the Territory Leadership Team. The CEO informs the firm's Board of Directors of matters significant for the firm. The CEO is responsible for preparing the matters to be decided on at Board meetings.

The CEO is also PwC Finland's Territory Senior Partner, the highest representative of PwC Finland in the PwC network.

Territory Leadership Team

The primary task of the Territory Leadership Team is to assist the CEO in operative leadership and the execution of the

Board's decisions. The Territory Leadership Team has no powers based on law or the articles of association. The Territory Leadership Team guides and develops the firm's operations in order to achieve its strategic objectives. The Territory Leadership Team is chaired by the CEO.

The Territory Leadership Team members serve as PwC Finland's management team members and participate in decision-making with the firm's best interest in mind. They may present the viewpoints of their own area of responsibility, but decisions must be made in accordance with the firm's benefit as a whole.

The Territory Leadership Team has access to the expertise of the sustainability experts employed by the firm.

The firm's Chief Sustainability Officer is its Chief Operating Officer, who is a member of the Territory Leadership Team. They prepare the target setting and action proposal for the management of the identified material sustainability aspects.

The firm's Territory Leadership Team monitors the risk management of identified material sustainability aspects.

Corporate Sustainability Steering Group

The main task of the Corporate Sustainability Steering Group is to coordinate the implementation of the sustainability strategy and to assist the Chief Sustainability Officer in the operational management of sustainability work. The Corporate Sustainability Steering Group consists of partners and employees employed by the firm, whose expertise covers all aspects of sustainability: the environment, society and governance. The Chair of the Corporate Sustainability Steering Group is the Chair of the firm's Board of Directors.

The manager responsible for each area and the supervisory body determined in the firm's management model are responsible for monitoring the impacts, risks and opportunities in each area, and for providing information, consultation and decision-making in the area. For example, the firm's Chief People Officer is responsible for the area related to ethical conduct, and the firm's General Counsel is responsible for anti-corruption activities.

The firm's Territory Leadership Team and Board of Directors handle matters related to sustainability as described below.

GOV- 2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Board of Directors, the Territory Leadership Team and the Corporate Sustainability Steering Group regularly discuss matters related to material sustainability topics. The Board of Directors reviews the results of the materiality analysis and will approve the statutory sustainability report. The Board regularly receives an overview of the progress of PwC Finland's corporate responsibility programme and the impacts and developments related to material sustainability topics, as well

as risks and opportunities. PwC's Territory Leadership Team meets every two weeks, and the Board of Directors meets once a month. The Corporate Sustainability Steering Group meets every two months, and the Inclusion & Diversity Steering Group meets four times a year.

During the reporting period, the following topics related to sustainability have been addressed:

Board of Directors

- Employee satisfaction
- Employee bonuses
- Independence issues
- Management model update
- Charity donations
- Assurance of sustainability reporting
- Approval of the corporate responsibility review and the transparency report
- Approval of the double materiality analysis
- Regulatory review, including sustainability reporting

Territory Leadership Team

- Review of the results of the staff survey, and the action plan
- People strategy and action plan
- Diversity & Inclusion plan for the financial period
- Ethics tracking
- PwC Professional plan
- Review of the responsibility matrix
- Validation of the double materiality analysis
- Sustainability development projects

Corporate Sustainability Steering Group

- Objectives of the corporate responsibility programme, and monitoring their progress
- Sustainability report development work and its follow-up
- Supervision of the implementation of the double materiality analysis
- Charity donations

Inclusion & Diversity Steering Group

- Review of the results of the staff survey
- Development projects related to inclusion
- The Inclusion team's staff campaigns
- I&D monitoring in business operations
- Monitoring of the Inclusion First training

GOV-3: Integration of sustainability-related performance in incentive schemes

PwC Finland has a performance-based incentive system, which covers the firm's management and staff. The bonus under the incentive scheme is a key part of the firm's remuneration model. Both numerical and qualitative targets are set annually for the management and the entire staff, based on which performance evaluation and remuneration are carried out. The targets include a wide range of issues related to business operations, quality, clients, staff and competence development. The weight of the targets varies in accordance with the tasks. In rewarding the management, significant emphasis is placed on the targets related to employee satisfaction, well-being and competence development. PwC Finland has yet to incorporate

climate change mitigation or emissions reduction targets into the remuneration system for the management and the entire personnel, but these are part of the firm's corporate responsibility programme.

GOV-4: Statement on due diligence

PwC Finland's operating methods include elements related to the due diligence process for material sustainability topics. The PwC network's Code of Conduct (shared values and ethical principles) provides the foundation and operating model for how the global expert organisation works. These principles unite PwC companies operating in different countries, ensuring that services based on the same values are provided to clients everywhere. The responsible way of working includes the principle that PwC's organisation implements its corporate citizenship as part of the surrounding society, reducing the financial, ecological and social risks inherent in the business and seizing the related opportunities.

PwC Finland requires its partners to operate in accordance with the PwC network's Third Party Code of Conduct. The Code of Conduct for third parties defines the requirements set by PwC Finland for its partners' ethics and sustainability. The operating principles take the due diligence obligation defined in the OECD Guidelines for Multinational Enterprises into account. PwC Finland is committed to assessing the performance of its partners in relation to the PwC network's ethical guidelines and independence and sustainability requirements. These requirements apply to the conduct of business, the processing of confidential information, respect for human rights, working conditions and environmental protection.

PwC Finland has a whistleblowing channel through which staff and stakeholders can report grievances. Reports are handled confidentially, and the firm has procedures for taking corrective measures if grievances are detected.

GOV-5: Risk management and internal controls over sustainability reporting

PwC Finland has started a development project to prepare for statutory sustainability reporting. As part of this work, PwC

Finland has defined roles and responsibilities in the firm's sustainability reporting and in the management and internal control of risks related to reporting. PwC Finland's Board of Directors will be responsible for the statutory sustainability report.

Separate internal audits are carried out annually of PwC Finland's governance, management, processes, and operations. The internal audits have their own rules of procedure, which define internal audit's tasks and reporting lines. Internal audit operates under the guidance of PwC Finland's Board of Directors. The audits are based on the annual operating plan. The individual audits are planned to cover their objectives, and the audit results are reported in writing. The report includes a description of the audit, its findings and recommendations. Each audited subject must comment on the findings and include corrective measures and the persons responsible. The audit results and any follow-ups to the findings are reported to PwC Finland's Board of Directors.

1.3 Strategy

SBM-1: Strategy, business model and value chain

Owned by its employees, PricewaterhouseCoopers Oy (PwC Finland) is a Finnish firm designated officially as an Authorised Public Accountants. The firm's services range from audits and other assurance services, merger and acquisition services, and management and tax consulting to legal services. Its operations cover the whole of Finland. PwC Finland is part of the global PwC network.

PwC Finland's strategy is based on the purpose of the firm's operations: to build trust in society and solve important problems. Values guide the implementation of the strategy. At the heart of the strategy are PwC's staff, clients and solutions produced for clients. These also include the material sustainability topics of PwC Finland's own operations and value chain.

PwC's values



Act with integrity

Speak up for what is right, especially when it feels difficult. Expect and deliver the highest-quality outcomes. Make decisions and act as if our personal reputations were at stake.



Make a difference

Stay informed and ask questions about the future of the world we live in. Create an impact with our colleagues, our clients and society through our actions. Respond with agility to the ever-changing environment in which we operate.



Care

Make the effort to understand every individual and what matters to them. Recognise the value that each person contributes. Support others to grow and work in the ways that bring out the best in them.



Work together

Collaborate and share relationships, ideas and knowledge beyond boundaries. Seek and integrate a diverse range of perspectives, people and ideas. Give and ask for feedback to improve ourselves and others.



Reimagine the possible

Dare to challenge the status quo and try new things. Innovate, test and learn from failure. Have an open mind to the possibilities in every idea.

PwC Finland is a professional services organisation with a heightened responsibility to lead the way in sustainability and sustainability impact management. The most significant sustainability impacts, risks and opportunities of the firm's strategy and business model are related to the competence and well-being of its staff. The firm's goal is to have staff who are energetic and enthusiastic about learning and solving important problems in society. Its experts work on sustainability challenges on a daily basis. The firm is constantly building an increasingly inclusive and equal culture that fosters a sense of community and transparency. PwC Finland is a significant employer, and the firm also offers more than 250 students a year the opportunity to familiarise themselves with diverse expert tasks as an intern.

Based on the client satisfaction survey conducted during the financial period, PwC Finland is a reliable advisor valued by clients. The firm's goal is to build meaningful client relationships and help clients build sustainable business operations, solve problems and identify opportunities. PwC increases trust in its clients' business operations by promoting continuity in business and by ensuring the accuracy of financial reporting, for example.

PwC Finland's business areas are management consulting and corporate restructuring, auditing and other assurance services, and tax consulting and legal services. The business areas produce services and combine their diverse expertise to meet clients' needs. To accelerate the joint growth and competence

development of the business areas, PwC Finland has determined three specific focus areas, one of which focuses on solving our clients' business sustainability challenges. The goal is to achieve significant growth in sustainability-related services and enable new business.

The strategy is made possible by a strong quality-based corporate culture, the use of technology and artificial intelligence, and high-quality internal services. The firm has set sustainability targets for its own operations and is committed to reducing environmental impacts in line with emissions reduction targets based on scientific knowledge. The aim is to ensure operational development in accordance with the objectives of the Paris Agreement on climate change.

PwC Finland's goal is to provide high-quality customer service in accordance with its values and to have a positive impact on society in doing so. To achieve significant sustainability impacts, strong and meaningful client relationships are essential. In accordance with its strategy, the firm has networked with important actors in society and actively participates in the social debate through various channels. The firm also supports themes or projects that are important for society through voluntary work.

In the financial period that ended on 30 June 2024, PwC Finland employed an average of 1,440 people. The total number of employees was 1,419 at the end of the reporting period, and the turnover was EUR 191 million.

PwC's value chain

Upstream		Own operations	Downstream
Indirect suppliers	Direct suppliers (Tier 1)		
Indirect impacts from upstream value chain	Services	Production of expert services	Clients
<p>Natural resources</p> <ul style="list-style-type: none"> - Ore - Crude oil - Natural gas - Coal - Wood - Water <p>Production</p> <ul style="list-style-type: none"> - Metals (Fe) - Metals (non-Fe) - Wood-based products - Plastics - Coatings, paints, other substances <p>Others</p> <ul style="list-style-type: none"> - Energy production and distribution - Water supply - Waste disposal 	<ul style="list-style-type: none"> - Office and premise services: company cars, coffee and beverage machines, furniture, meeting services, cleaning, working environment (e.g., ergonomics and office space planning), office supplies and groceries, office space and maintenance charges, destruction services for materials containing sensitive information, telephone switchboard, plants and other vegetation - Property maintenance services: smart solutions, maintenance, electricity, premise safety services - Personnel services: recruitment, training, occupational healthcare, events for the personnel, gifts, pensions, personnel insurance plans, outplacement, credit cards, rental apartments, collaboration with educational institutes, travelling - Technology services: infrastructure [including servers], office and local networks, telecommunication [including telephone switchboard], video conference devices, IT systems, IT consulting services - Financial management services: bank and financial services, auditing, corporate insurances, PwC Network - Marketing and communication services: marketing and communication tools, marketing materials and advertising, sales services, sponsorships, cooperation agreements, client events - Legal services: legal practices and advocacy, legal courses and literature, liability insurances 	<ul style="list-style-type: none"> - All work executed by PwC employees is considered expert work. 	<ul style="list-style-type: none"> - PwC offers expert services to clients regardless of their industry. - Every engagement requires a client identification process, during which the client is investigated for actual and potential risks, including but not limited to the following topics: reputation, financing, economic sanctions, money laundering, corruption and restrictions.
	Others		
	<ul style="list-style-type: none"> - Building owners and investors - Recipients of donations - Overseer PRH - Technology suppliers - Joint Business Relationships - Distributors of rental workforce - Owners (partners) - Other entities of the global PwC Network 		

SBM-2: Interests and views of stakeholders

The goal of PwC's stakeholder collaboration is to network with parties that are important for the firm, and to collect and share information that is material for business operations and clients. It is also important that the firm understands the expectations set by stakeholders for PwC Finland's business operations and sustainability impacts, and that the firm builds solutions for the material sustainability issues of its clients and society.

The firm's key stakeholders are clients, staff, educational institutions and partners such as organisations, unions and associations closely related to its sector. Other PwC network member firms in different countries are also important partners for PwC Finland. The authorities supervising our operations are also important stakeholders.

The firm's Territory Leadership Team manages stakeholder relationships as part of normal business management. For clients, annual client satisfaction surveys are a key channel of interaction. The firm develops experts' interaction training based on the client feedback received.

In terms of staff, the main channels for hearing opinions are the annual staff survey (Global People Survey) and the People group, which officially represents the employees. Business-group-specific development plans are drawn up annually based on the staff survey.

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

As a result of the double materiality assessment, the firm has identified the following material impacts, risks and opportunities:

PwC Finland's own operations have little impact on the environment. The most significant impacts are related to the energy consumption of facilities and technology, and to greenhouse gas emissions caused by business travel.

PwC's own operations have an impact on employees' working conditions and equal treatment. Important areas include work-life balance, health and safety, adequate pay, freedom of association, employees' rights to information, consultation and participation, training and skills development, gender equality, measures to prevent violence and harassment in the workplace, and diversity.

PwC's goal is to provide its employees with a collaborative and inclusive workplace community that creates well-being and increases a sense of community among employees. Employees are provided with ample learning opportunities, which strengthens the staff's professionalism. The firm's business operations depend on the continuous availability of qualified staff, as competent staff are essential in guaranteeing the quality of the services provided. Failure to recruit (e.g. as a result of weakened employer image) may lead to loss of income.

The firm offers equal employment opportunities regardless of gender, age, nationality or sexual orientation. The annual performance review process aims to ensure that pay and career development are balanced. The firm pays its employees an adequate salary, which increases the well-being and sense of security of the staff. The People team, which consists of PwC Finland's employees and representatives, serves as a channel for discussion between the management and staff. The People team's work improves the working atmosphere and promotes well-being and inclusion at work. In the firm's work culture, flexibility in terms of working hours, such as remote work opportunities, promotes the achievement of a balance between work and leisure time. Expert work is intensive, and the workload is occasionally very heavy, which in turn reduces the well-being of employees.

The firm is committed to protecting and respecting its clients' intellectual property rights through related confidentiality and data protection measures.

PwC has established a Code of Conduct, and all employees are required to complete Code of Conduct training. This increases trust among clients and long-term and mutually beneficial client relationships. Ethical operating principles are also seen to have a positive impact on client satisfaction. PwC has a whistleblowing channel, through which it is possible to submit a report anonymously.

1.4 Impact, risk and opportunity management

1.4.1 Materiality assessment process

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

PwC Finland's double materiality assessment process was carried out in the autumn of 2023 in accordance with the requirements of the ESRS standards. The process involved four phases: describing the sustainability context and value chain; identifying impacts, risks and opportunities; assessing their materiality; and defining material information.

The working group for the double materiality analysis included the members of PwC Finland's Territory Leadership Team, as well as other key representatives of the firm in terms of the matters to be discussed. The identification of impacts, risks and opportunities and the assessment of their materiality involved methods suitable for different phases, such as workshops, interviews, and data analyses of relevant data sources.

The double materiality analysis was started by defining PwC's Finland value chain in a joint workshop of the working group. The result was a description of the main actors in the upstream and downstream value chain and PwC Finland's own operations. Based on what was discussed in the value chain workshop, both actual and potential impacts on people or the

environment were identified. The discussion took the broad concept of sustainability into account, including all sustainability aspects covered by the topical ESRS standards.

PwC Finland's business relies on the provision of expert services to a wide range of clients operating in different sectors. Efforts were not made to determine impacts in accordance with specific clients or sectors but at a more general level. PwC Finland operates only in Finland, but the identification of impacts took the actors in the value chain into account, regardless of their geographical location. For example impacts on people were identified using the information obtained through PwC Finland's whistleblowing channel. Providing a whistleblowing channel is part of PwC Finland's due diligence process.

Impact assessment		Severity			Likelihood
		Scale	Scope	Irremediable character of the impact	
Actual	Negative	x	x	x	
	Positive	x	x		
Possible	Negative	x	x	x	x
	Positive	x	x		x

The assessment used a scale of 1 to 5 to assess the severity of the impacts and their likelihood. In terms of potential negative human rights impacts, it was noted that the severity of the impact took precedence over its likelihood.

Financial risks and opportunities related to sustainability topics for PwC Finland's business operations were also determined through identified dependencies. In the case of PwC Finland, dependencies are related to human resources in particular, as the business is based on the provision of expert services. In addition, risks identified through PwC Finland's risk management system were used in determining risks.

The materiality of the identified risks and opportunities was assessed using the three-step assessment model of PwC Finland's risk management system. The model assesses the likelihood and financial impact of the occurrence of risks and opportunities, based on which they are classified as low, moderate or high in severity.

PwC Finland's key internal and external stakeholders (clients, suppliers and partners) were involved in the first double materiality analysis process carried out by PwC Finland in the autumn of 2023. An interview session was organised with the representatives of each stakeholder group, at which they were invited to share their views on the material impacts, risks and opportunities of PwC Finland based on the topics, sub-topics and sub-sub-topics of the ESRS standard. They were then presented with the results of the completed double materiality analysis, and comments were collected to validate the impacts, risks and opportunities identified as being material. The issues

In determining the impacts, the impacts generated in the value chain through PwC Finland's own operations and business relationships were taken into account.

In identifying and assessing the impacts, risks and opportunities, their materiality in the short, medium and long terms was considered in accordance with the definitions in ESRS 1.

The materiality of the impacts was assessed in accordance with the requirements of ESRS 1 based on their severity and likelihood. The table below illustrates the criteria used for impact assessment in assessing actual, potential, negative and positive impacts.

raised by stakeholders were very similar to those identified by the working group, so the views confirmed the result of the analysis carried out.

The members of the working group confirmed the summary of the results of the double materiality assessment. The results presented in the final report were validated by PwC Finland's Corporate Sustainability Steering Group and approved by PwC Finland's Board of Directors on 15 December 2023.

In the future, the need to update the double materiality analysis will be evaluated annually by the Corporate Sustainability Steering Group. For the 2024 financial period, no need was identified to update the double materiality analysis in the second half of the financial period. The results of the double materiality assessment will be integrated into PwC Finland's risk management system so that the information in the risk management system is used in updating the double materiality analysis, and the risks identified in the risk management process are updated through the impacts and risks identified based on the double materiality analysis if necessary.

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

PwC Finland has identified and assessed the greenhouse gas emissions caused by its value chain and has prepared a greenhouse gas (GHG) inventory in accordance with the GHG Protocol.

In the double materiality assessment, the working group has evaluated PwC Finland's operations to identify climate-related impacts, risks and opportunities. As a firm providing expert services, the environmental impacts of PwC Finland's own operations mainly consist of energy used for the needs of its operations and business travel. In connection with the double materiality assessment, it was not identified that PwC Finland's business would be exposed to material risks arising from climate change in the short, medium or long term.

Regarding the upstream value chain, the identification of impacts was based on an understanding of the operations of long-term partners and the insights gained through stakeholder interviews. The firm's supply chain creates indirect climate impacts, where the most significant emission sources are related to technology and business facilities. For the client companies in the downstream value chain, the impacts, risks or opportunities related to climate change were not included in the analysis.

IRO-2: ESRS disclosure requirements taken into account in the company's sustainability statements

Disclosure requirements included in the report

Standard	Disclosure Requirement (DR)	Sustainability Report Sections
ESRS 2	ESRS 2 BP-1	1.1 General basis for preparation
	ESRS 2 BP-2	1.1 General basis for preparation
	ESRS 2 GOV-1 – GOV-5	1.2 Governance
	ESRS 2 SBM-1 – SBM-3	1.3 Strategy
	ESRS 2 IRO-1	1.4 Impact, risk and opportunity management
	ESRS 2 IRO-2	1.4.1 Materiality assessment process
	ESRS 2 MDR-P	<ul style="list-style-type: none"> - Climate Change: E1-2 - Own workforce S1-1 - Taxes GRI 207-1 - Consumers and end-users S4-1 - Business conduct G1-1
	ESRS 2 MDR-A	<ul style="list-style-type: none"> - Climate Change: E1-3 - Own workforce S1-4 - Taxes GRI 207-2 - Consumers and end-users S4-4 - Business conduct 4.1.1 Impact, risk and opportunity management
	ESRS 2 MDR-M	<ul style="list-style-type: none"> - Climate Change: E1-5, E1-6, Projects Financed by Carbon Credits for Greenhouse Gas Removals and Mitigation - Own workforce S1-6, S1-7, S1-8, S1-9, S1-10, S1-11, S1-13, S1-14, S1-15, S1-17 - Taxes GRI 207-4 - Business conduct G1-4
ESRS E1	ESRS 2 MDR-T	<ul style="list-style-type: none"> - Climate Change: E1-4 - Own workforce S1-5
	ESRS E1-1	2.1.1 Climate Change strategy
	ESRS E1-2	2.1.2 Impact, risk and opportunity management
	ESRS E1-3	2.1.2 Impact, risk and opportunity management
	ESRS E1-4 – E1-6	2.1.3 Metrics and targets
ESRS S1	Projects Financed by Carbon Credits for Greenhouse Gas Removals and Mitigation	2.1.3 Metrics and targets
	ESRS S1-1 – S1-4	3.1.1 Impact, risk and opportunity management
GRI 207 (2019)	ESRS S1-5 – S1-7, S1-9 – S1-11, S1-13 – S1-15, S1-17	3.1.2 Metrics and targets
	GRI 207-1 – 207-3	3.2.1 Impact, risk and opportunity management
ESRS S4	GRI 207-4	3.2.2 Metrics and targets
	ESRS S4-1 – S4-5	3.3.1 Impact, risk and opportunity management
ESRS G1	ESRS G1-1	4.1.1 Impact, risk and opportunity management
	ESRS G1-3	4.1.1 Impact, risk and opportunity management
	ESRS G1-4	4.1.2 Metrics and targets

List of datapoints that derive from other EU legislation

Disclosure requirement and related datapoint	Location in report / Immaterial
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	1.2 Governance
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)	1.2 Governance
ESRS 2 GOV-4 Statement on due diligence paragraph 30	1.2 Governance
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	No activity
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	No activity
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	No activity
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv	No activity
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14	2.1.1 Climate Change Strategy
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	2.1.1 Climate Change Strategy
ESRS E1-4 GHG emission reduction targets paragraph 34	2.1.3 Metrics and Targets
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Immaterial
ESRS E1-5 Energy consumption and mix paragraph 37	2.1.3 Metrics and Targets
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Immaterial
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	2.1.3 Metrics and Targets
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	2.1.3 Metrics and Targets
ESRS E1-7 GHG removals and carbon credits paragraph 56	2.1.3.2 Metrics
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	Immaterial
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).	Immaterial
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy- efficiency classes paragraph 67 (c).	Immaterial
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69	Immaterial

Disclosure requirement and related datapoint	Location in report / Immaterial
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil paragraph 28	Immaterial
ESRS E3-1 Water and marine resources paragraph 9	Immaterial
ESRS E3-1 Dedicated policy paragraph 13	Immaterial
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Immaterial
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Immaterial
ESRS 2 – IRO-1 - E4, paragraph 16 (a) i	Immaterial
ESRS 2 – IRO-1 – E4, paragraph 16 (b)	Immaterial
ESRS 2 – IRO-1 – E4, paragraph 16 (c)	Immaterial
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Immaterial
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Immaterial
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Immaterial
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Immaterial
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Immaterial
ESRS 2 – SBM-3 – S1 Risk of incidents of forced labour paragraph 14 (f)	Immaterial
ESRS 2 – SBM-3 – S1 Risk of incidents of child labour paragraph 14 (g)	Immaterial
ESRS S1-1 Human rights policy commitments paragraph 20	3.1.1 Impact, risk and opportunity management
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 paragraph 21	3.1.1 Impact, risk and opportunity management
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	3.1.1 Impact, risk and opportunity management
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	3.1.1 Impact, risk and opportunity management
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	3.1.1 Impact, risk and opportunity management
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	3.1.2 Metrics and Targets
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	3.1.2 Metrics and Targets
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Immaterial

Disclosure requirement and related datapoint	Location in report / Immaterial
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Immaterial
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	3.1.2 Metrics and Targets
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	3.1.2 Metrics and Targets
ESRS 2 – SBM-3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Immaterial
ESRS S2-1 Human rights policy commitments paragraph 17	Immaterial
ESRS S2-1 Policies related to value chain workers paragraph 18	Immaterial
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Immaterial
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8 paragraph 19	Immaterial
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Immaterial
ESRS S3-1 Human rights policy commitments paragraph 16	Immaterial
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Immaterial
ESRS S3-4 Human rights issues and incidents paragraph 36	Immaterial
ESRS S4-1 Policies related to consumers and end-users paragraph 16	3.3.1 Impact, risk and opportunity management
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	3.3.1 Impact, risk and opportunity management
ESRS S4-4 Human rights issues and incidents paragraph 35	Immaterial
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Immaterial
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	Immaterial
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	4.1.2 Metrics and Targets
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	4.1.2 Metrics and Targets



2

Environmental disclosures

Content

2. Environmental disclosures	18
2.1. ESRS E1 Climate change	18
2.1.1. Climate change strategy	18
2.1.2. Impact, risk and opportunity management	18
2.1.3. Metrics and targets	19

2. Environmental disclosures

2.1. ESRS E1 Climate change

2.1.1. Climate change strategy

E1-1 Transition plan for climate change mitigation

As a firm providing expert services, PwC Finland's environmental impacts mainly consist of energy used for the needs of its own operations and business travel. The firm's supply chain creates indirect environmental impacts, where the most significant emission sources are related to technology and business facilities.

The PwC network is committed to the United Nations' Race to Zero campaign and the Paris Agreement to limit global warming to 1.5°C. In September 2020, the PwC network published its Net Zero commitment to achieve net zero greenhouse gas emissions by 2030. In July 2021, the independent Science Based Targets initiative (SBTi) confirmed PwC's short-term emissions reduction targets, on which the commitment is based. The commitment covers the entire network of the PwC network and thus also obligates PwC Finland.

2.1.2. Impact, risk and opportunity management

E1-2: Policies related to climate change mitigation and adaptation

PwC Finland's operating principles for mitigating and adapting to climate change are based on the global operating principles of the PwC network.

The firm recognises that as a firm providing expert services, it can only have a limited impact on climate change mitigation through its own operations. The impact is significantly greater when the firm offers its clients support in their efforts to mitigate climate change, and guides and supports its own staff in making more sustainable choices. PwC's experts also support client companies in their sustainability reporting and its assurance.

The firm aims to involve employees in various ways in the mitigation of environmental impacts (see section E1-3 for more information about the measures).

The firm's measures and operating principles are aimed directly at the introduction of renewable energy and indirectly at mitigating climate change by changing travel habits, for

example. Among other measures, the firm has required its Helsinki office property to switch to district heating from renewable sources from 2022 onwards.

As part of the change in the firm's operating culture, and particularly regarding energy efficiency and the adoption of renewable energy, PwC Finland has prepared travel guidelines for the business travel of staff, instructing them to minimise their carbon footprint and use virtual meetings as an alternative to travel whenever possible.

To ensure that its entire supply chain is committed to mitigating climate change, PwC requires third parties to identify and manage the environmental impacts of their organisations. PwC requires that third parties minimise greenhouse gas emissions and engage in projects that promote environmental responsibility, efficient waste management and the efficient use of natural resources. We require our contractual partners to commit to PwC's global sustainability requirements.

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

To increase its impact on climate change mitigation, the firm offers its employees several ways to participate in activities aimed at mitigating environmental impacts. PwC Finland has a Green Team, within which a group of staff members introduce environmental issues to employees' daily lives through various events and briefings. Established events include bike maintenance days, Earth Hour, waste collection near the office, and various recycling briefings. The Green Team has also published the firm's guidelines for organising sustainable catering and events.

The firm's measures to mitigate and adapt to climate change are long term to ensure that their impacts are permanent and on a sustainable basis. Since 2019, the firm has reduced business travel and the resulting absolute emissions by 50%. To ensure that the staff identify travel costs and emissions, the firm maintains a Travel Dashboard, where everyone can monitor the impacts of their own travel.

The firm has changed its car policy so that employees are only entitled to a company car for limited use – not as a full company car benefit. The aim of the change is to guide motorists to consider whether they need to drive. With the change of the car policy in the spring of 2022, the car procurement limits were changed so that an increasing number

of electric car models fitted within the procurement limits. As a result of these changes, the average emissions from company cars at the end of the financial period are 35 gCO₂/km, and electric cars and plug-in hybrids account for 86% of company cars.

In terms of target setting, the firm has initially monitored only the electricity consumption of the Helsinki office and later the electricity consumption of all Finnish offices. The firm's electricity consumption has decreased by 51% at the Helsinki office since 2019, when the monitoring started. The Helsinki office accounts for around 85% of all offices' electricity consumption. Offices using renewable energy account for around 98% of the firm's total office area.

As a token of our mitigation efforts, we have been awarded the Silver-level EcoVadis certification since 2014.

PwC Finland has placed particular emphasis on the following measures to reduce emissions:

- Almost all offices have used only electricity produced from renewable sources since 2015.
- In accordance with the firm's operating principles, the Helsinki office switched to using district heat from renewable sources from 2022 onwards.
- The firm is actively working to increase the sustainability awareness of its staff with the aid of the Travel Dashboard, for example, where everyone can follow the development of their own greenhouse gas emissions caused by business travel.

Greenhouse gas emissions reductions		
Achieved GHG emissions reductions	tCO ₂ eq	773
Expected GHG emissions reductions	tCO ₂ eq	245

During the financial period, the composition of the firm's Corporate Sustainability Steering Group has been strengthened, and the group has increased cooperation with the firm's sustainability experts.

In November 2023, Kati Tammilehto, Chief Operating Officer and member of the firm's Territory Leadership Team, was appointed as the firm's Chief Sustainability Officer.

2.1.3. Metrics and targets

E1-4: Targets related to climate change mitigation and adaptation

The baseline for PwC's review is the financial period that ended on June 2019. By 2030, PwC is committed to:

1. Reducing emissions from its own operations (Scopes 1 & 2) by 50%
2. Reducing emissions from business travel (Scope 3) by 50%
3. Switching completely to renewable electricity.

PwC is also committed to supporting its suppliers in setting their own science-based emission targets (SBTi), accounting for 50% of the products and services purchased by PwC by 2025.

GHG emissions reduction targets and target values in line with the 1.5 degree pathway

	Baseline value for reduction targets in 2019	Baseline value for reduction targets	Share of combined greenhouse gas emissions reduction targets	GHG emissions reduction targets by 2030	Target value compatible with the pathway to 1.5°C	
	Absolute Value tCO2-eq	Absolute value tCO2-eq	%	Absolute value tCO2-eq or percentage of base year	Year 2030	Year 2050
Scope 1	184	92	50%	92	107	18
Scope 2	394	197	50%	197	229	39
Scope 3	1,148	574	50%	574	666	115
Total	1,726	863		863		

Scope 3 science-based short-term emission targets (SBTi) only include emissions from business travel. The baseline value only includes emissions from air travel, while the baseline value for the reporting period also includes other types of travel.

Emissions reduction pathway

	2030	2050
Cross-sector (ACA) reductions pathway based on the year 2020 as the reference year	-42%	-90%

Source: based on 'Pathways to Net-zero – SBTi Technical Summary' (version 1.0, October 2021)

E1-5: Energy consumption and mix

Energy consumption and mix	Unit	2024
Total fossil energy consumption	MWh	1 106
Share of fossil sources in total energy consumption	%	34 %
Consumption from nuclear sources	MWh	0
Share of consumption from nuclear sources in total energy consumption	%	0 %
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	5
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	2 110
Consumption of self-generated non-fuel renewable energy	MWh	0
Total renewable energy consumption	MWh	2 115
Share of renewable sources in total energy consumption	%	66 %
Total energy consumption	MWh	3 221

Energy intensity based on net revenue

Energy intensity per net revenue	2024 MWh / milj. €
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh / million euro)	16.9



Revenue from climate-impacting sectors: EUR 190,8 million

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

		Retrospective				Interim targets and target years			
		Base year	Comparative	N	Change				Annual % target / base year
		2019	2023	2024	% (2024/2023)				
Scope 1 greenhouse gas emissions									
Gross Scope 1 GHG emissions	tCO2eq	184	85.0	52.0	-39%		92		
Percentage of Scope 1 GHG emissions from regulated emissions trading schemes	%	0	0	0	0%				
Scope 2 greenhouse gas emissions									
Gross location-based Scope 2 GHG emissions	tCO2eq	538.0	115.5	126.1	9%				
Gross market-based Scope 2 GHG emissions	tCO2eq	394.0	59.5	82.2	38%		197		
Significant Scope 3 greenhouse gas emissions									
Total Gross indirect (Scope 3) GHG emissions	tCO2eq	1,148.0	2,186.0	2,819.1	29%				
1 Purchased goods and services	tCO2eq	Not reported	1,621.0	2,000.0	23%				
6 Business travel	tCO2eq	1,148.0	565.0	819.1	45%		574		
Total greenhouse gas emissions									
Total GHG emissions (location-based)	tCO2eq	1,870.0	2,386.5	2,997.2	26%				
Total GHG emissions (market-based)	tCO2eq	1,726.0	2,330.5	2,953.3	27%				

Information about value chain estimation in accordance with the BP-2 disclosure requirement:

Metrics	Basis of preparation	Planned actions to improve accuracy in the future
E1-6 ESRS E1 44 a) gross Scope 1 GHG emissions	The emissions factors used for estimation are the average factors used by the PwC network for the different fuels used.	The emissions factors are updated annually.
E1-6 ESRS E1 44 b) gross Scope 2 GHG emissions / E1-6 49 a) location-based	The emissions factors used for estimation are averages for different energy sources. The source is Statistics Finland, which publishes coefficients for the greenhouse gas emissions of average electricity production in Finland. Based on these, the average for the last three statistical years (2020–2022) has been calculated, where cogeneration has been divided by the energy method.	The emissions factors are updated annually.
E1-6 ESRS E1 44 b) gross Scope 2 GHG emissions / ESRS E1 49 b) market-based	The emissions factors used for estimation are averages for different energy sources. The source is Statistics Finland, which publishes coefficients for the greenhouse gas emissions of average electricity production in Finland. Based on these, the average for the last three statistical years (2020–2022) has been calculated, where cogeneration has been divided by the energy method.	The emissions factors are updated annually.
E1-6 ESRS E1 44 c) gross Scope 3 GHG emissions / ESRS E1 51 Scope 3 Category 1	Spend-based emissions factors have been used for estimation. The emissions factors are spend-based emissions factors used by the PwC network.	The emissions factors are updated annually.
E1-6 ESRS E1 44 c) gross Scope 3 GHG emissions / ESRS E1 51 Scope 3 Category 6	The emissions factors used for estimation in the case of air travel are the emissions factors determined by the travel agency by type of transport, and in the case of road transport, the emissions factor is the average in Finland per kilometre driven. The source is Finnish Transport and Communications Agency Traficom. The kilometres of taxi travel have been estimated based on the taxi costs for the financial period and using the average price per kilometre of the service providers as a coefficient.	The emissions factors are updated annually.

Additional information on greenhouse gas emissions for scope 2 and scope 3		
Share of market-based scope 2 GHG emissions linked to purchased electricity bundled with instruments such as Guarantee of Origins or Renewable Energy Certificates	%	85.0
Share of scope 3 GHG emissions calculated using primary data obtained from suppliers or other value chain partners	%	24.5

E1-6: GHG intensity based on net revenue

GHG intensity per net revenue	2024 (tCO ₂ eq/million €)
Total GHG emissions (location-based) emissions per net revenue (tCO ₂ eq / million euro)	1.57
Total GHG emissions (market-based) per net revenue (tCO ₂ eq / million euro)	1.55

Greenhouse gas reductions and mitigation projects funded through carbon offsets

In addition to reducing emissions, PwC Finland is committed to offsetting its remaining emissions from Scope 1 and Scope 2, as well as business travel emissions. Until 2030, business travel emissions will be offset annually through the LEAF project (Lowering Emissions by Accelerating Forest finance), which supports the slowing down of deforestation, among other causes. From 2030 onwards, PwC will move to a 100% carbon removals to support its commitment. This removal is generated by activities that absorb carbon from the atmosphere (such as afforestation, carbon-dioxide capture and storage).

The PwC network has set quality criteria for member companies for offsetting CO₂ emissions. The criteria define standards, project types, portfolio composition and the approach to eliminating emissions, and they require that projects undergo a due diligence audit of third-party suppliers.

PwC’s current carbon offsetting portfolio focuses on natural climate solutions and emerging economies. The projects support other sustainable development outcomes such as the protection of health and livelihoods, as well as critical ecosystems in rural communities. For the 2024 financial period, PwC Finland has offset a total of 1,000 tCO2e in the following projects as part of its global portfolio.

GHG emissions offsetting for the financial year 2024	
Project name	Project summary
Ghana – Balancing conservation and economic growth	<p>Ghana has a strong track record in implementing REDD+ programmes. The country joined the REDD+ readiness process in 2008. It signed a five-year emissions reduction agreement (ERPA) in 2019 with the Forest Carbon Partnership Facility (FPCF), securing more than USD 50 million for the production of deforestation-free cocoa. In addition, Ghana launched a USD 54.5 million Ghana Shea Landscape Emission Reductions Project (GSLERP) with the Green Climate Fund (GCF) to mitigate the impacts of climate change in the northern savanna, aiming to reduce emissions by 25 million tonnes over 20 years.</p> <p>The LEAF Coalition, which uses the ART/TREES standard for GHG emissions reductions and removals, supports these efforts by ensuring the participation of indigenous stakeholders in the planning and implementation of REDD+ actions.</p>



3 Social disclosures

Content

3. Social disclosures	25
3.1. ESRS S1 Own workforce	25
3.1.1. Impact, risk and opportunity management	25
3.1.2. Metrics and targets	29
3.2. Taxes	34
3.2.1. Impact, risk and opportunity management	34
3.2.2. Metrics and targets	35
3.3. ESRS S4 Consumers and end-users	36
3.3.1. Impact, risk and opportunity management	36

3. Social disclosures

3.1. ESRS S1 Own workforce

3.1.1. Impact, risk and opportunity management

S1-1: Policies related to own workforce

In this section, we describe the policies that aim to increase the positive impact of PwC on a strong workplace community and well-being and health at work, as well as psychological safety, employee participation rights, pay levels, competence development, equality and diversity, and the prevention of harassment and unethical conduct.

Ethical rules and general sustainability principles

PwC is committed to respecting human rights (Human Rights Statement) and internationally recognised labour principles such as the goals of the UN Global Compact and the ILO.

Each PwC employee is required to act in accordance with these principles. PwC complies with applicable labour law. All third parties with whom we work are also committed to adhering to similar principles in their own operations (PwC's Global Third Party Code of Conduct). In addition, the Code of Conduct for PwC's own operations clarifies and concretises guidelines and provides guidance for reflection in challenging situations.

Code of Conduct and values guide our operations

The PwC network's Code of Conduct – shared values and ethical operating principles – creates a foundation and operating model for the way in which a global expert organisation works. These principles unite PwC companies operating in different countries, ensuring that services based on the same values are provided to clients everywhere. PwC's sustainable way of working includes the principle that PwC's organisation implements its corporate citizenship as part of the surrounding society, reducing the financial, ecological and social risks inherent in the business, and seizing the related opportunities.

The Code of Conduct defines how PwC employees should behave and act in different working life situations.

It is the responsibility of all employees to know the content and message of these principles. According to the Code of Conduct:

- It is everyone's responsibility to act and help others act in line with the shared principles and PwC guidelines

- Employees are advised and asked to express their concerns about ethically questionable conduct if they come across such conduct in their work
- Violation of the guidelines or failure to respond to violations may result in disciplinary measures of different levels, up to the termination of employment.
- International assignments follow the rules and guidelines in accordance with the operating method and culture of the country in which the assignment takes place.

Conflicts and inappropriate behaviour

PwC Finland does not tolerate inappropriate behaviour, harassment, discrimination or bullying. Inappropriate and bad behaviour refers to behaviour that disturbs the performance of work or other employees' well-being. Inappropriate behaviour can take many forms; it can also involve inappropriate actions in working with clients or using the firm's funds. PwC has common operating models for situations in which unethical or inappropriate conduct or behaviour or harassment is detected. Everyone has the right and the obligation to address inappropriate behaviour if necessary.

Recruitment

In recruitment, PwC Finland adheres to the DEI principles, the purpose of which is to ensure the fairness of the process and the fair treatment of applicants.

Diverse, equal and inclusive recruitment

PwC Finland's recruitment decisions are made in a non-discriminatory manner, regardless of age, gender, nationality, health, disability, religion, sexual orientation or marital status, for example. The firm's goal is for everyone to feel that they belong to the team and that they are valued as themselves.

Inclusive job listings

Job advertisements use easy-to-understand language and avoid gendered or obscure expressions. The predetermined assessment criteria are based on the skills, qualifications, experience and language skills required to perform the work tasks.

Easy job application process

At PwC, we learn and grow together. An applicant for a job therefore does not need to meet all the criteria. It is easy to apply for a job at PwC: in addition to the traditional application

process, applicants can also apply for most jobs by answering a few questions and linking their LinkedIn profile to the application.

Equal assessment criteria and interview questions

Applicants are assessed based on predetermined criteria. Interview questions are prepared to provide the most relevant information about the applicants' skills and competencies required for the job. To increase the objectivity of the selection, all applicants are interviewed by at least two people.

Thinking is constantly challenged

Recruiters are provided with training on unconscious bias, diversity promotion and inclusive recruitment practices. In accordance with the firm's values, all parties' thinking is challenged when making recruitment decisions, and the firm aims to minimise unconscious bias at every stage of recruitment.

Competence development

As an expert organisation, it is essential for PwC that every PwC employee is constantly developing as a professional in terms of different skills. PwC provides training in the development of various competencies. A large part of competence development is offered on a career level basis, which means that training is available to all persons who work at the same career level in the same business. Participation in such training is often required to update professional skills as regulations and laws change. This mandatory or optional content provided by the PwC network constitutes the majority of staff training. Compulsory training in ethical principles (Code of Conduct) and information security is repeated annually. At the beginning of their employment relationship, new employees complete mandatory training at least in relation to ethical principles and, in most cases, in their own professional area.

Career progress

The principle of PwC's performance management process is to build transparency and trust in decisions related to career progress and remuneration. Decisions are always made based on joint reflection and common criteria by supervisors at a specific career level as a whole. Discussions between supervisors and staff to clarify the principles of career progress and career development opportunities are an integral part of the process.

PwC Finland is committed to providing equal opportunities for professional development for everyone. Among other aspects, to monitor and support this goal, the firm monitors the proportion of women and men in sales teams and key accounts and in the firm's management.

Well-being at work

People and their well-being play a key role in PwC's strategy. Caring is everyone's responsibility, and the supervisor and the management have a special responsibility here. Individuals

are supported in many ways if they experience challenges in well-being at work.

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

PwC Finland invests heavily in creating a speak-up culture and open interaction. The firm's goal is to foster an atmosphere in which everyone dares to express their opinions, bring their own contribution to the development of the workplace community and work, and address any grievances they have detected if necessary. Developing psychological safety in teams is an essential part of strengthening the speak-up culture.

One of the key communication channels is the CEO webcast for all staff, with various guest speakers discussing the strategy and its different themes, client cases and current matters. At the end of each webcast hosted by the CEO, there is a question-and-answer section for the staff to ask questions or express their thoughts to the management, either in their own name or anonymously. The aim is to increase an open and transparent culture. Six CEO webcasts were held during the 2024 financial period. Many questions were presented through the question-and-answer sections at the end of the webcasts. The questions were answered immediately during the live broadcast whenever possible. Supervisors can participate four times a year in a live stream information session, during which current issues are reviewed, and questions can be asked.

PwC also has a specific body dedicated to increasing interaction between staff and the management: the People group is a working group consisting of representatives chosen by the staff and representatives of the firm.

The group is chaired by the Chief People Officer (CPO). The CPO ensures that interaction takes place regularly, and that the results are taken into account in the policies as necessary. The group's most important task is to serve as a channel for discussion between the firm's management and staff, and its operation also covers the requirements of regular dialogue as set by the occupational health and safety organisation and the Co-operation Act.

To promote an open culture, the People group also discusses significant organisational reforms, general guidelines and practices affecting staff, matters related to the development of the workplace community and skills, proposals for changes related to employee benefits or other similar matters mentioned above, and matters determined by law. The staff's views are thus communicated through their representatives.

For example, in the 2024 financial period, the People group had an impact on the content of the car policy and arrangements related to firm parties. It also raised concerns about employee consultation in a certain part of the organisation. This concern has been addressed and developed.

The term of office of the People group is two calendar years. The People group that operated in the 2024 financial period was elected in the autumn of 2022 and started its work at the turn of 2023. The group consists of eight representatives of the staff and two representatives of the employer. In addition, the CEO participated in a few separately agreed People group meetings. The group met seven times during the 2024 financial period.

An important channel for dialogue and the development of a diverse and inclusive workplace community is the I&D Steering Group, led by the CEO and the Diversity and Inclusion Leader. The steering group consists of a representative of each business unit of PwC Finland, as well as the Chief People Officer, and meets at least four times a year. The purpose of the steering group is to ensure that the firm progresses towards its I&D goals at the level of PwC Finland, in each business unit and in internal services. The steering group engages in active dialogue and cooperates with the volunteer Inclusion team.

The Inclusion team, consisting of staff, contributes to an inclusive workplace community that fosters diversity. The Inclusion team consists of four subgroups: Family; Equity; Shine, or the LGBTQ+ community; and Language & Culture. The Inclusion team is open to everyone and is based on volunteering. The aim of the groups is to promote an increasingly inclusive culture and work community through tangible actions from a selected perspective.

Key channels for employee engagement also include the extensive Global People Survey, which we carry out once a year in accordance with the PwC network process. Its results are shared with the leaders of larger teams (10 or more respondents). Teams and business units analyse the results and prepare development plans to strengthen the identified development areas.

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

In addition to the development of general management and supervisory work, PwC has implemented the following processes, channels and mechanisms to effectively remediate any shortcomings and promote their remediation:

- The Ethics Helpline whistleblowing channel
- The People group, which serves as a channel for discussions between the staff and the firm's management
- The Conflicts and Inappropriate Behaviour guidelines for employees and supervisors
- Workplace mediation
- Global People Survey for the staff
- Annual confirmation of policy compliance (Annual Compliance Confirmation)

It is the responsibility of each PwC employee to report conduct that violates legislation or the firm's values, ethical principles and various policies. The employee's supervisor is the closest and usually the most suitable person to whom they can report

violations. A report can also be submitted upwards in the line, all the way to the CEO. In addition, PwC Finland has a separately appointed Ethics & Business Conduct (E&BC) Leader, who in the financial period that has ended was the firm's Chief People Officer (CPO). Through their role, the CPO is a natural party to hear various concerns or suggestions for corrective measures. In addition, each business unit has its own HR representatives, with whom employees can also share their concerns if talking to their supervisor seems difficult. In the case of legal violations, because of the nature of the matter, the firm's legal department may be the right party with which to discuss the matter.

Despite a culture of openness and encouragement to speak up, employees may sometimes be unsure about to whom they should turn. The whistleblower may also wish to remain anonymous. Particularly in such situations, PwC has the Ethics Helpline whistleblowing channel to report violations of its values and guidelines, and to ask questions related to the situation.

The Ethics Helpline channel can also be used by parties outside PwC, such as clients and partners. To ensure the functioning of the channel, one important investigation principle is that it must be safe to report suspected misconduct. PwC is committed to protecting the whistleblower from retaliation. Depending on the case, the reports submitted will be processed by the Ethics & Business Conduct Leader, the General Counsel, or an employment lawyer. The party responsible for the processing will assess how and to what extent the reported matter will be investigated in accordance with the global investigation principles of the PwC network (Complaints & Allocations Policy). All suspected violations reported, as well as their processing stages and conclusions, are documented in a separate database. Cases from outside the Ethics Helpline can also be recorded in the same database; that is, cases that have come to the attention of the E&BC Leader or an HR representative through other means.

To ensure that important channels of influence are known among the staff, the firm's management regularly communicates these topics to the entire staff. In addition, information about different channels of influence is constantly available in the firm's intranet. The availability and discoverability of the ethics-related information was further developed during the 2024 financial period. A new Ethics section was created in the intranet, bringing together ethics-related information from different locations. Each PwC employee is required annually to confirm (Annual Compliance Confirmation) that they are familiar with certain important policies and acted in accordance with them.

In the 2024 financial period, the firm's goal was to make employees' concerns more visible and document them. In previous years, the number of cases reported to the Ethics Helpline has been very low. For example, a total of four cases were documented during the 2023 financial period. In the 2024 financial period, the number of cases increased to twelve.

Although the total number of cases is still relatively low, and some of the cases reported through the channel are of such a nature that they fall outside the types of cases described in this report, the tripling of the number of cases nonetheless indicates a development in line with the target – that the courage exists to report and raise potential concerns.

For example, the results of the annual employee satisfaction survey (Global People Survey 2024) developed positively in terms of the question that measures how natural it is to raise or report challenging ethical questions without the fear of possible adverse consequences. Correspondingly, for the three sets of questions measuring ethical perspectives as a whole, there was an increase of three percentage points from the previous year. On the whole, the proportion of people who responded positively is 80% at the level of the firm as a whole (People Engagement Index).

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

At PwC Finland, staff-related risks are identified as part of the firm-level risk assessment and in several business or function-specific risk assessments. The most material identified risks are risk assessments and surveys related to ethical operating principles and occupational safety and health. Risk assessments are used in the planning of measures.

Training and competence development

Each of PwC Finland's business units is responsible for developing professional skills related to its services. In addition, the firm provides training related to leadership and other essential working life skills.

In terms of management, the themes of the training include change, well-being and sales management. At PwC, guidance is provided at the beginning of employees' careers. In terms of leadership skills, the development of self-leadership skills is seen as the cornerstone on which other leadership skills are built. Career-level coaching programmes therefore begin with the basics of self-leadership, after which we begin to build skills related to other types of leadership, such as the coaching leadership approach.

In terms of working life skills, the firm's training selection includes training related to interaction and presentation skills and to working in a diverse working environment. Training related to risk management and independence, which are prerequisites for high-quality operations, is also key.

The firm has invested in the development of digital and data skills, as these skills are identified as a significant area of expertise. For the last four years, the firm's staff have had the opportunity to spend five working days each year training and developing their data and digital skills. Competence development related to the use of artificial intelligence began in 2024.

Inclusion and diversity

Promoting inclusion and diversity is important for PwC Finland and is part of the strategy. For each financial period, the firm creates an Inclusion & Diversity action plan, which contributes to promoting equal opportunities and securing a workplace where discrimination and harassment are not tolerated. The implementation of the action plan and the development of the targets and indicators in the right direction are monitored by the Inclusion & Diversity Steering Group, which meets four times a year and is headed by the firm's I&D Leader and CEO.

To identify possible gaps and development needs related to career progress, the firm conducts various surveys and focus group discussions led by the HR function. Examples of such discussions in the 2024 financial period included the discussions aimed at those returning from family leave and those who do not speak Finnish, with the aim of identifying possible shortcomings in orientation and opportunities to create a career and develop professionally at PwC. In the financial period that ended in June 2024, the firm also increased its awareness of neurodiversity. In addition, inclusive meeting practices were created so that despite people's different ways of working, everyone has the opportunity to be heard at meetings and to express their views.

At PwC, the physical operating environment has been adapted to support commuting for individuals with physical disabilities. At the end of the 2024 financial period, the firm started cooperation with an expert firm specialising in the accessibility of office premises. An ESKEH accessibility survey will be carried out on the premises of the Helsinki office, taking the statutory accessibility requirements and recommendations into account. The survey will be carried out on two floors of the office over one day. The accessibility survey covers not only movement, vision and hearing accessibility but also sensory accessibility. The survey will result in recommendations for how to adapt office spaces to better serve all employees. PwC Finland will move to new facilities during the 2027 financial period, and accessibility will also be taken into account in the design of these facilities.

The firm's Inclusive Mindset Learning Path is a comprehensive training package on the basics of DEI. New partners are required to complete the training in their first year.

Measures related to work-life balance

At PwC, well-being at work, work-life balance, and the promotion and maintenance of working capacity are guided not only by regular discussions with the employee's supervisor but also by the Code of Conduct for working capacity management, which is based on active support. The promotion of well-being at work and working capacity is a proactive activity, and its goal is to identify the factors that threaten employees' working capacity, initiate the necessary measures and maintain health throughout employees' careers. Supervisors familiarise themselves with the model of active

support through training. PwC also has a tool in place to help supervisors, the HR function and the occupational healthcare provider in supporting staff, monitoring sickness absences and anticipating disability risks.

PwC uses Auntie, a low-threshold mental health support service, which provides support for employees who have challenges in work and life management, for example. In addition, short-term psychotherapy is available through the occupational healthcare provider.

PwC has also paid special attention to workload management and the adequacy of resources for well-being at work and the quality of work.

During the financial period, supervisors held more than 300 discussions as part of the early support process. Common goals were set for supervisors, such as supporting the well-being of their team members. With these common goals, the aim is to bring clarity to the expectations related to the role of a supervisor and its significance.

Occupational accident prevention and management system

Occupational healthcare activities are based on a workplace survey carried out by the occupational healthcare provider. The workplace survey, which is carried out every three to five years, is used to jointly identify workplace needs: it assesses the significance of health hazards and harms, stress factors, and resources arising from work, the working environment and the workplace community. The occupational health and safety function participates in workplace surveys. Any targeted workplace surveys are always agreed separately.

In addition to statutory accident insurance, all PwC employees have leisure and remote work accident insurance. Accidents are reported and monitored. In the 2024 financial period, accidents were minor, and the number of workplace accidents remained at the same level as in the previous year

Financial resources allocated to the management of material impacts on own workforce

PwC Finland's HR team represented an average of 30 person-years during the 2024 financial period. There were 257 persons in a supervisory role in the firm. On average, each supervisor was responsible for 6 people.

In the reporting period, PwC Finland's occupational healthcare costs totalled EUR 743,206, of which EUR 699,491 was reimbursed by Kela (Social Insurance Institution of Finland), and EUR 43,715 consisted of other occupational healthcare costs.

A total of EUR 1,339,157 was spent on staff training.

A total of EUR 2,274,669 was spent on staff recreation activities (parties, leisure activities, refreshments in office facilities).

The staff's lunch meals were supported with a total of EUR 474,115.

3.1.2. Metrics and targets

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

PwC Finland's goal is a strong workplace community where every employee can feel that they belong, and where management and HR processes support development opportunities and fair operations.

In terms of the "strong workplace community" material positive impact, the firm's key indicator is the People Engagement Index (PEI) of the annual Global People Survey (GPS). A target of 80% was set for the reporting period. With the aid of the staff survey, we identify strengths and development needs on different organisational levels, for which GPS action plans are drawn up. In the reporting period, the People Engagement Index was 80%, which is the highest result the firm has ever achieved for this indicator.

In addition, a GPS Pulse survey was carried out during the financial period. This is an indicator applied to the financial period and an intermediate assessment of the success of the measures taken. As a result of the intermediate assessment, no measures were added to the original GPS action plans. The survey results are processed at different levels of the organisation. The themes of the staff survey include well-being, ethical conduct, the opportunity to freely express views, and leadership.

The firm has set Inclusion & Diversity targets and indicators up to 2030 to monitor the progress of diversity and inclusion in the desired direction.

Key indicators include women's proportion of partners and the management, women's proportion of key account managers, women's proportion in terms of the recruitment of experienced professionals, and the Global People Survey's Inclusion Index, which measures success in building an inclusive workplace community through four questions.

Good immediate management and supervisors' goals: Supervisors have common goals as part of the annual targets. These goals emphasise regular contact with team members as a way to build a trusting and open relationship, as well as supporting development and sustainable ways of working.

In managing impacts related to well-being and health at work, the goal is to reduce the number of sickness absences (overall and long absences) and to monitor support provided in working capacity risk situations. In practice, the latter means that a tool called the Team Leader Compass, implemented with the support of the occupational healthcare provider, is used to support the identification and monitoring of working capacity risk situations. The goal has been a downward trend in sickness absences lasting more than 30 days, which has been achieved

S1-6: Characteristics of the undertaking's employees

Gender distribution of employees

Gender	Number of employees in the workforce (by head count)
Male	681
Female	727
Other	0
Not disclosed	11
Total employees	1,419

At the end of the 2024 financial period, the number of employees was 1,419 (1,353 in the previous year). Women accounted for 51.2% of the staff, and men for 48.0%, while 0.8% have not reported their gender.

Employee information

30.6.2024	Female	Male	Others ¹⁾	Not Reported	Total
Employees (head count / full time equivalent)	698.7	660.3	0	9.5	1,368.5
Permanent employees (head count / full time equivalent)	675.1	625.5	0	6.5	1,307.1
Temporary employees (head count / full time equivalent)	23.6	34.8	0	3.0	61.4
Non-guaranteed hours employees (head count / full-time equivalent)	0	0	0	0	0
Number of full-time employees (headcount / full-time equivalent)	657.0	637.0	0	8.0	1,302.0
Number of part-time employees (headcount / full-time equivalent)	41.7	23.3	0	1.5	66.5

¹⁾ Self-reported gender of employees

Employee turnover		
The turnover of the company's employees during the reporting period	Persons / individuals in permanent employment at the end of the financial year	1,346
Total number of employees who have left the company during the reporting period	Persons	156
Rate of employee turnover	%	12.0

During the financial year 2024, 156 permanent employment contracts ended. Permanent employment contracts at the company mainly end due to resignations.

S1-7: Characteristics of non-employee workers in the undertaking's own workforce

Non-employees in the company's own workforce		
Total number of non-employees in the company's own workforce	persons	41

S1-8: Collective bargaining coverage and social dialogue

Collective bargaining coverage		
Percentage of total employees covered by collective bargaining agreements	%	0
Percentage of employees covered by workers' representatives	%	100

PwC Finland is not a member of any employers' association and is therefore not an organised employer. The firm is therefore not bound by any collective agreement. In addition, no universally binding collective agreement has been established for PwC Finland's sector. The firm is therefore not bound by any collective agreement, but its operations are guided by labour law, the terms and conditions of employment contracts, and the firm's internal guidelines and established practices. Employees are free to join the trade union of their choice. The firm does not object to unionisation.

S1-9: Diversity metrics

Top management gender distribution 2024								
	Male		Female		Other gender		Not specified	
	people	%	people	%	people	%	people	%
Board	5	71%	2	29%	0	0%	0	0%
Executive Team (TLT)	4	50%	4	50%	0	0%	0	0%
Total	9	60%	6	40%	0	0%	0	0%

Distribution of employees by age group		
	hlö	%
Under 30 years old	473	33.6%
30-50 years old	796	56.5%
Over 50 years old	139	9.9%

S1-10: Adequate wages

PwC Finland pays adequate wages to all its employees in accordance with the reference values applicable to the ESRS S1 standard.

unemployment security practices related to social security in Finland. Both the employer and the employee contribute to these costs in the form of statutory contributions. In addition, PwC provides its employees with leisure accident insurance. Employees on an assignment abroad are insured with separate assignment insurance in the event of illness and accidents.

S1-11: Social protection

All employees of the firm are covered by social protection. This is mainly achieved through the pension, disability and

S1-13: Training and skills development metrics

Performance and career development reviews and training for employees broken down by gender					
		Male	Female	Not disclosed	Total
Percentage of employees that participated in regular performance and career development reviews	%	83%	82%	33%	82%
Average number of training hours completed per employee with an employment contract	Hours per person	88	85	110	86

Interns, employees with contracts shorter than 6 months, absentees, and terminated contracts are excluded from the regular performance and career development reviews reported at the end of the fiscal year.

Average number of training hours per employee, by group and broken down by gender					
		Male	Female	Not disclosed	Total
Partner	Hours	28	31	0	29
Salaried partner	Hours	49	50	0	49
Director	Hours	36	55	0	44
Senior Manager	Hours	40	49	0	44
Manager	Hours	62	58	0	60
Senior Associate	Hours	96	70	0	81
Associate	Hours	147	157	110	152
Intern	Hours	139	140	0	140
Admin	Hours	18	19	0	19

S1-14: Health and safety metrics

Accidents in the 2024 financial period were minor, and the number of workplace accidents remained at the same level as in the previous year. Sickness absences decreased from the previous financial period (2024: 2.39%, 2023: 2.67%) Only employees with employment contracts are taken into account in the calculation of sickness absences.

Coverage of the health and safety management system		
Percentage of people in the company's own workforce who are covered by the company's health and safety management system based on legal requirements and/or recognised standards or guidelines	%	100
Percentage of non-employees in the company's own workforce who are covered by the company's health and safety management system based on legal requirements and/or recognised standards or guidelines	%	0

Non-employee workers are not covered by occupational health.

Health and safety metrics of employees				
		Employees in the company's own workforce	Non-employees in the company's own workforce	Other workers working on the company's premises
Number of fatalities as a result of work-related injuries	Fatality	0	PwC Finland is not aware of any such cases	PwC Finland is not aware of any such cases
Number of fatalities as a result of work-related ill health	Fatality	0	PwC Finland is not aware of any such cases	PwC Finland is not aware of any such cases
Number of recordable work-related accidents	Accident	7	PwC Finland is not aware of any such cases	-
Number of commuting accidents ¹⁾	Commuting accident	7	-	-
Rate of recordable work-related accidents ^{**}	Ratio	2.7	PwC Finland is not aware of any such cases	-

¹⁾ The number of commuting accidents includes all accidents that occurred during commuting. The company does not have information on how many of these accidents occurred during trips between the workplace and client premises, which would classify them as work-related accidents.

^{**}) The number of work-related accidents for employees with employment contracts within the company's own workforce / the total number of hours worked by employees with employment contracts within the company's own workforce

Work-related ill-health cases and absences		
Number of cases or recordable work-related ill health	Case	0
Number of days lost to work-related ill health from work-related accidents	Day	14
Number of days lost to work-related fatalities from work-related accidents	Day	0
Number of days lost to work-related ill health from work-related injuries	Day	0
Number of days lost to work-related fatalities from work-related ill health	Day	0
Sickness absence rate	%	2.39%

S1-15: Work-life balance metrics

Work-life balance metrics		
Percentage of employees entitled to take family-related	%	100.0
Percentage of entitled employees that took family-related leave	%	10.5
Percentage of entitled employees that took family-related leave – male	%	9.2
Percentage of entitled employees that took family-related leave – female	%	11.7
Percentage of entitled employees that took family-related leave – other	%	0
Percentage of entitled employees that took family-related leave – not disclosed	%	0

In light of the figures, there does not seem to be a major difference between the genders in the amount of parental leave taken, but it should be noted that women's leave usually lasts considerably longer, as almost all relevant women take maternity and family leave. Men use the other parent's leave.

S1-17: Incidents, complaints and severe human rights impacts

The firm has an Ethics Helpline channel for both internal and external stakeholders to raise complaints, claims and concerns. In the 2024 financial period, the firm did not receive any complaints, claims or questions from third parties. There was a total of nine cases initiated internally through the Ethics Helpline channel, two of which concerned the same case, and four

other separate cases were documented in the same database as incidents outside the whistleblowing channel. In total, twelve different reported cases were investigated in the firm.

The cases have been thoroughly investigated, and the firm treats every case with the utmost seriousness. In an investigation, the need for corrective measures is always assessed, and the necessary measures are taken. However, some of the incidents reported through the channel are of such a nature that they fall outside the types of incidents described in this report. These cases may include issues related to normal working life that have been raised through the Ethics Helpline channel. No incidents of serious human rights violations came to the firm's attention.

Work-related incidents of discrimination and complaints related to human rights impacts during the reporting period		
Total number of incidents of discrimination, including harassment, reported	Case	6
Total number of incidents of discrimination, including harassment – reviewed by the company	Case	6
Number of incidents of discrimination, including harassment – remediation plans that have been implemented, with results reviewed through routine internal management review processes	Case	4
Total number of incidents of discrimination, including harassment – no longer subject to action	Case	6
Number of complaints filed through channels for own people in the company's own workforce to raise concerns (including grievance mechanisms) – reviewed by the company	Complaint	4
Number of complaints filed through channels available to the company's own workforce (including grievance mechanisms) – remediation plans being implemented	Complaint	4
Number of complaints filed through channels available to the company's own workforce (including grievance mechanisms) – remediation plans being implemented	Complaint	0
Number of complaints filed through channels available to the company's own workforce (including grievance mechanisms) – remediation plans that have been implemented, with results reviewed through routine internal management review processes	Complaint	1
Number of complaints filed through channels available to the company's own workforce (including grievance mechanisms) – no longer subject to action	Complaint	4
Number of complaints filed through the National Contact Points for OECD Multinational Enterprises	Complaint	0
Number of complaints filed through the National Contact Points for OECD Multinational Enterprises – reviewed by the company	Complaint	0
Number of complaints filed through the National Contact Points for OECD Multinational Enterprises – remediation plans being implemented	Complaint	0
Number of complaints filed through the National Contact Points for OECD Multinational Enterprises – remediation plans that have been implemented, with results reviewed through routine internal management review processes	Complaint	0
Number of complaints filed through the National Contact Points for OECD Multinational Enterprises – no longer subject to action	Complaint	0
Total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed in this table.	€	0

Identified cases of severe human rights incidents in the reporting period		
Number of severe human rights incidents connected to the company's workforce	Case	0
Number of severe human rights cases of non-respect of the UNGPs on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises	Case	N/A
Number of severe human rights incidents where the company played a role in securing remedy for those affected	Case	N/A
Number of severe human rights incidents connected to the company's workforce – reviewed by the company	Case	N/A
Number of severe human rights incidents connected to the company's workforce – remediation plans being implemented	Case	N/A
Number of severe human rights incidents connected to the company's workforce – remediation plans that have been implemented, with results reviewed through routine internal management review processes	Case	N/A
Number of severe human rights incidents connected to the company's workforce – no longer subject to action	Case	N/A
Total amount of fines, penalties and compensation for damages for the severe human rights incidents disclosed in this table	€	0

3.2. Taxes

3.2.1. Impact, risk and opportunity management

GRI 207-1: Approach to tax

PwC's purpose is to build trust in society and solve important problems. In maintaining trust, transparency is a key factor, and PwC Finland also wants to be transparent about the direct added economic value of its activities for the surrounding society in the form of taxes and tax-related fees. In addition, PwC Finland participates in dialogue on the importance of business operations by explaining how creating added economic value in our business also creates added financial value for society.

The services provided by PwC Finland to its clients create added economic value for both PwC and its employees, as well as for society. Added value is distributed to employees and shareholders living in Finland in the form of salaries, performance bonuses and dividends. This added value results in various contributions for society in the form of corporate income tax, value added tax, personal taxation contributions, and social and pension insurance contributions.

PwC Finland's business operations are carried out by PricewaterhouseCoopers Oy, which is wholly and directly owned by its shareholders living in Finland. The firm's operations are not funded from abroad, and it does not have any interest-bearing liabilities from abroad. The variable salary portions paid by the firm to its staff and shareholders are determined based on the firm's results, the fulfilment of personal goals and high-quality operations based on its values. In addition to salary, the shareholders also receive dividends from the firm. Shareholders do not receive any salary or other personal financial payments from the PwC network. The firm's annual operating profit is mainly used to remunerate staff and shareholders.

In all its activities, PwC follows both the letter and the spirit of the law. PwC Finland does not have a separate written tax policy. In tax management, the firm complies with the PwC network's Global Code of Conduct and Global Tax Code of Conduct. The latter applies to work with clients in particular, but its principles are also applied in PwC's own operations.

PwC Finland reports tax information applying the GRI 207 standard. In addition, the firm publishes other information relevant in terms of its operations, which has previously been published as part of PwC's tax footprint.

GRI 207-2, 207-3: Tax governance, control and risk management

PwC Finland strives to understand potential tax risks and monitor them effectively. The firm monitors legislative changes and anticipates their impacts on its operations.

PwC Finland's Chief Operating Officer is responsible for tax administration and reporting. The firm's Finance team is involved in tax reporting and is responsible for the implementation of high-quality and efficient financial management and financial business advice. The firm's own tax experts are also involved in tax reporting when necessary. The Finance team's operations are regulated by the Accounting Manual, which contains a description of the operating principles and approval processes.

To build trust and promote constructive dialogue and information-based decision-making, the firm seeks to cooperate with the tax authorities and engage in political debate related to taxation. PwC Finland also has an Ethics Helpline channel for tax matters through which the firm's staff can report any concerns.

3.2.2. Metrics and targets

GRI 207-4: Country-by-country reporting and PwC Finland's tax footprint

Objectives

PwC Finland's business operations are carried out by PricewaterhouseCoopers Oy. In addition to reporting tax information in accordance with the GRI 207 standard, the firm publishes other key business information previously published as part of PwC's tax footprint.

Turnover for the reporting period amounted to EUR 191 million. The amount of paid taxes and tax-like charges and payments totalled EUR 102 million. Totalling EUR 64 million, corporate taxes and withholding tax, as well as social security and pension payments, accounted for the majority of these taxes and tax-like charges.

To a significant degree, the added economic value generated by our firm for society, or the firm's tax footprint, consists of withholding tax collected and paid by the firm. The amount of withholding tax is presented in the table below.

During the financial period 1 July 2023 to 30 June 2024, the firm had one part-time employee in Belgium, where the firm has been registered and paid corporate tax. The firm's operations in Belgium ceased during the financial period. The figures for Belgium are irrelevant for the firm, so they are reported below as part of the figures for Finland.

Country-specific figures and taxes and tax-like charges for the financial year from 1 July 2023 to 30 June 2024		
Operations: Management consulting, including auditing services		
Number of employees	Persons on average	1,440
Revenues from transactions with independent parties	€	190,806,520
Profit before tax	€	17,210,891
Tangible assets other than cash and cash equivalents	€	4,080,806
Accrued income taxes	€	3,318,529

Revenue	190,806,520 €
Total taxes and fees	101,565,345 €
Tax withheld in advance	30,397,309 €
Social security contributions	1,408,981 €
TyEL pension insurance	25,429,501 €
Unemployment insurance contributions	3,329,900 €
VAT paid	37,658,832 €
Corporation tax	3,340,823 €

3.3. ESRS S4 Consumers and end-users

3.3.1. Impact, risk and opportunity management

S4-1: Policies related to consumers and end-users

PwC Finland's data protection and information security policies are designed to protect client and end-user data in a way that ensures trust in all situations.

PwC Finland's data protection and information security policies consist of the PwC network's Code of Conduct, PwC Third Party Code of Conduct, Acceptable Use Policy, Data Classification Standard, and data protection and information security policies. The data protection principles adhered to by PwC Finland are in line with the OECD recommendation (Recommendation of the Council concerning Guidelines Governing the Protection of Privacy and Transborder Flows of Personal Data). The PwC Code of Conduct is available to everyone on the firm's website, and the PwC Third Party Code of Conduct is incorporated into all cooperation agreements.

PwC Finland's key operating principles are:

- Respecting the privacy and confidentiality of clients', employees' and other business partners' data
- Protecting personal and other confidential information in all formats
- Collecting, storing, using, transferring and disposing of personal and other confidential information transparently
- Collecting, using and storing personal and other confidential information only if we have a legitimate reason to do so.

The principles are designed to ensure the confidentiality, integrity and availability of data and to comply with relevant regulations such as the General Data Protection Regulation (2016/679). The operating principles help PwC Finland maintain a strong position in terms of data protection and information security and ensure that confidential information is always protected.

PwC Finland's clients are mainly companies. The policies related to consumers and end-users therefore mainly apply to the employees of corporate clients, as well as other stakeholders, such as current and former employees, suppliers and other partners and their employees, and people who participate in PwC Finland's events.

S4-2: Processes for engaging with consumers and end-users about impacts

PwC Finland has processes in place that enable open communication with clients, staff and other end-users such as stakeholders. This includes feedback channels through which clients and end-users can express their concerns and receive quick responses.

Clients and end-users have several ways to contact the firm about privacy issues. These methods include the general PwC Finland contact channel, as well as contacting the firm

using the contact form available in the privacy policy section of PwC Finland's public website, calling the switchboard, sending an email to fi_gdpr@pwc.com, and sending a letter to PricewaterhouseCoopers Oy, Privacy Affairs, P.O. Box 1015, 00101 Helsinki. The staff also have other contact channels at their disposal if any problem situations arise.

Questions raised and other issues will be answered without undue delay. The main responsibility for communication lies with the persons responsible for data protection and information security, with the support of other experts if necessary. Ultimately, the senior management (CEO / Territory Leadership Team members) will also engage in communication with clients and end-users.

S4-3: Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

PwC Finland is committed to correcting any negative impacts related to the confidential information of clients and end-users. It is important for PwC Finland that clients and end-users understand how their confidential data is processed, and that they have control of their data by exercising their rights. This includes clear and understandable privacy policies and easy-to-use contact channels. The operating principles are followed in the same way for all clients and end-users. Corrective measures are taken in accordance with the operating principles.

PwC Finland provides contact channels through which these parties can raise their concerns and ensure that their concerns are appropriately addressed. In the event of a data breach involving a high risk for the end-user, PwC Finland will approach each end-user personally and inform them as required by the General Data Protection Regulation.

Contact channels are discussed under S4-2. In addition, PwC Finland has a whistleblowing channel (Ethics Helpline) through which third parties can also submit reports. Whistleblowers are protected from retaliation. Information about these channels is provided on PwC Finland's public website, and their functionality is ensured by testing the processes. The contact channels are further developed as necessary. Due to the low number of contacts, there is no feedback from clients and end-users on the channels.

S4-4: Taking action on material impacts on consumers and end-users, and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

PwC Finland takes proactive measures to manage the potential negative impact on client and end-user data. The firm reviews its data protection and information security practices at least annually and makes any necessary changes to ensure that clients' and end-users' confidential data remain secure.

PwC Finland has a Data Protection Officer and a Chief Information Security Officer (CISO), who take care of the

appropriate management of data protection and information security. In addition, PwC Finland has an Information Protection Committee (IPC), which plans and implements an annual compliance programme. This group monitors the effectiveness of local information security and data protection measures and risk assessments, and addresses any identified deficiencies on a quarterly basis. PwC Finland's governing bodies (Territory Leadership Team and Board of Directors) regularly receive information about the management of data protection and information security in PwC Finland and are ultimately responsible for its appropriate management.

PwC Finland collects, stores, uses, transfers and disposes of personal and other confidential data in a manner that is transparent and promotes trust. Personal, client and other confidential data are collected and processed only if there is a legal basis to do so. Access to this data is provided only as permitted. Confidentiality obligations continue beyond the termination of the employment relationship. In PwC Finland, everyone has a role to play in protecting the confidential data processed in its various forms: 1) Only approved PwC systems and applications are used in the work; 2) Data are disclosed only when there is a legal basis to do so, including the use of social media; 3) Caution is exercised in discussions in public spaces; 4) PwC Finland ensures the protection of physical copies of data; 5) All unintended disclosures of personal data are identified without delay.

In terms of information security, PwC Finland has a set of rules in its network traffic firewall that a) allows or b) warns about (but allows) or c) blocks traffic in accordance with whether the content (or category) of the target site is classified as being malicious or contrary to PwC's values. The Chief Information Security Officer (CISO) is responsible for ensuring the confidentiality, integrity, availability, reliability and proper disposal of data through appropriate security measures. This includes informing interested parties in connection with retention requests and ensuring that data are not altered, modified or deleted without permission.

The information is classified based on its sensitivity. This classification includes the categories of highly confidential, confidential, internal and public. Each category has its specific processing requirements to prevent unauthorised access and disclosure.

Access to personal and confidential data is limited as necessary. This means that only people who need access to perform their work tasks are granted permission.

PwC Finland reports annually to the PwC network on data protection compliance. In addition, all new employees are informed of their safety responsibilities and must comply with all the applicable policies and procedures.

Staff must complete mandatory data protection and information security training annually and provide annual confirmation of compliance with the operating principles (Annual Compliance Confirmation).

The effectiveness of data protection and information security measures is monitored at the meetings of the Information Protection Committee on a quarterly basis. The same group ensures that any negative impacts are corrected.

S4-5: Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

For example, the objective of information security is to ensure through active device vulnerability updates (Vulnerability Management) that there is no infection platform for viruses or other similar threats, or that the infection platform is as small as possible. PwC's goal is to make vulnerability updates without delay, so that vulnerability updates older than 30 days are minimised.

In the field of data protection, the following activities are regularly carried out:

- Developing internal processes and training for staff to improve data protection and raise awareness. This may include privacy training and regular reviews of compliance with the privacy policies.
- Implementing technical and organisational measures to protect personal data against unauthorised access and processing, and against accidental loss, destruction or damage.
- Promoting openness and transparency in data protection practices and ensuring that all privacy policies are clear, understandable and easily accessible.
- Assessing and managing data protection risks regularly, including any security breaches and their impact, and developing action plans to minimise the risks.

The effectiveness of data protection and information security measures is monitored by the responsible parties mentioned under S4-4 above, and at the meetings of the Information Protection Committee on a quarterly basis.



4

Governance information

Content

4 Governance information	39
4.1. ESRS G1 Business conduct	39
4.1.1. Impact, risk and opportunity management	39
4.1.2. Metrics and targets	40

4 Governance information

4.1. ESRS G1 Business conduct

4.1.1. Impact, risk and opportunity management

G1-1: Business conduct policies and corporate culture

PwC Finland complies with the PwC network's anti-corruption policy, which corresponds to the anti-corruption policy of the UN Convention Against Corruption. The policy of the PwC network applied by PwC Finland is intended to prevent any inappropriate influence on its business operations and is applied in all operations of the firm. In support of this policy, internal and external parties have access to the Ethics Helpline whistleblowing channel for reporting all types of misconduct, and to PwC's international network's global principles for investigating suspected misconduct that has come to light.

PwC Finland is committed to protecting those who have raised issues from any negative consequences. There is a process and policy in place to identify, resolve and correct violations of anti-corruption policies. In addition, compliance with the standard and local practices is assessed annually, and any deficiencies identified are corrected.

PwC Finland is committed to high ethical standards and transparency in its business operations. This is clearly reflected in its corporate culture and operating principles, which guide its day-to-day operations and decision-making. Risk management identifies and manages business impacts, risks and opportunities. This system covers all business areas and is integrated into everyday work.

The prevention of corruption and bribery is an integral part of PwC's ethical commitment. The firm has developed comprehensive training programmes and policies to ensure that all employees are aware of and commit to complying with anti-corruption and anti-bribery policies. Anti-corruption policies are integrated into all business processes to ensure that operations are ethical and transparent.

Independence

As auditors and providers of other professional services, PwC's member firms such as PwC Finland and their partners and staff are expected to adhere to the fundamental principles of objectivity, integrity and professional conduct. For assurance clients, independence forms the basis of these principles. Adherence to these principles is the starting point for serving capital markets and clients.

The PwC Global Independence Policy is based on the international independence standards included in the IESBA Code of Ethics. These guidelines contain the minimum standards with which PwC's member firms are committed to complying, including the processes to ensure independence from clients where necessary.

PwC's Global Independence Policy covers areas such as the following:

- Personal and firm independence
- Non-audit services and compensation arrangements
- Business relationships
- Approval of new audit and assurance clients

As a member firm of the PwC network, PwC Finland has several systems and tools in place to support PwC member firms and their staff in implementing and complying with policies and procedures related to independence. In addition, PwC Finland has local systems in place.

PwC Finland organises both annual and continuous training in independence matters for all its partners and other staff. This training typically focuses on relevant training required in connection with position or role changes, changes in independence guidelines or regulations, and the provision of services if necessary.

Partners and other staff must provide annual confirmation of compliance (Annual Compliance Confirmation).

As part of the company-wide Recognition and Accountability Framework, PwC Finland has access to the Independence Accountability Framework and the supporting consequential policies and procedures, which promote compliance with the independence guidelines and processes, and require the reporting and processing of breaches of the independence requirements.

PwC Finland has appointed a partner (Partner Responsible for Independence, PRI) with appropriate seniority and status who is responsible for the implementation of the PwC independence guideline (Global Independence Policy) and the related independence processes, as well as for supporting business operations. The partner is supported by a team of independence experts. The PRI reports directly to the Territory Risk & Quality Leader, who is a member of the firm's Territory Leadership Team.

G1:3 Prevention and detection of corruption and bribery

PwC Finland complies with the PwC network’s anti-corruption policy, which corresponds to the anti-corruption policy of the UN Convention Against Corruption. The PwC network policy followed by PwC Finland aims to prevent corruption and bribery. In addition, the firm has an advisory helpline and a whistleblowing channel (Ethics Helpline) in accordance with the ethical guidelines for reporting misconduct. The investigators are separate from the involved chain of command.

Among other actions, PwC Finland has taken the following measures in its anti-corruption activities:

- Appointed a person in charge of anti-corruption activities
- Carried out an annual anti-corruption risk assessment
- Prepared an annual action plan based on a corruption risk assessment
- Implemented the anti-corruption policy of the PwC network and supplemented it as necessary with respect to local laws and risks. The anti-corruption policies are also available to all PwC Finland staff. Training in the operating principles is provided annually for all employees and partners.

The above measures are part of PwC Finland’s commitment to high ethical standards, and they help ensure that corruption and bribery do not occur in PwC Finland’s operations. In addition, PwC Finland complies with the UN Declaration of Human Rights and its ten principles related to human rights, labour, the environment and anti-corruption activities, and is committed to the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the UN Convention Against Corruption.

Coverage of anti-corruption and anti-bribery training programmes		
Percentage of functions-at-risk covered by anti-corruption and anti-bribery training programmes	%	100

4.1.2. Metrics and targets

PwC Finland’s goal is to ensure that there is no corruption or bribery in its operations regarding staff, clients, suppliers or other stakeholders.

It is the responsibility of PwC Finland to monitor the effectiveness of the quality control system when monitoring compliance with the independence requirements. In addition to the validations provided as part of this monitoring, the following are tested:

- Compliance of controls and procedures
- Compliance with personal independence rules
- An annual assessment of the firm’s compliance with the PwC network’s independence standard.

The results of PwC Finland’s monitoring and testing are regularly reported to the firm’s management, which receives an annual summary report on the matter.

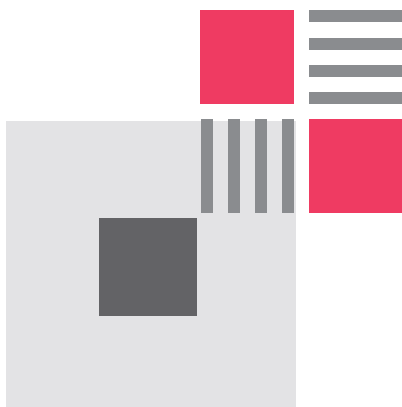
The aim is to ensure that PwC Finland and the firm’s staff comply with the policies and requirements related to independence, thereby preventing possible violations.

G1-4: Incidents of corruption or bribery

The number of convictions and the amount of fines for violations of anti-corruption and anti-bribery laws is zero.

Violation of anti-corruption and anti-bribery laws		
Number of convictions for violation of anti-corruption and anti-bribery laws	convictions	0
Amount of fines for violation of anti-corruption and anti-bribery laws	€	0

Independence-related performance indicators are based on the results of various quality audits and the timely completion of independence training.



PwC's purpose is to build trust in society and solve important problems. We help companies to improve their efficiency, promote growth and sustainability, and report reliably in a constantly changing environment. In Finland, we have 1,400 experts working nationwide. Our services include consulting, deals, tax, legal, risk assurance, audit and other assurance services. For more information: www.pwc.fi/en.

PwC operates in 149 countries and employs over 370,000 experts worldwide. PwC refers to the PwC network and/or one or more of its member firms, each of which is a separate legal entity. Please see www.pwc.com/structure for further details.



PricewaterhouseCoopers Oy, P.O. Box 1015 (Itämerentori 2), FI-00101 Helsinki, Finland.
Telephone +358 (0)20 787 7000.

© 2024 PricewaterhouseCoopers Oy. All rights reserved.