ESG Policy

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F-Secure

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Audience

This policy is aimed at all Fellows, Leadership Team and administrative bodies of F-Secure.

1. Overview

F-Secure ambition is to deliver sustainable security experiences to our partners and consumers. On this journey it's our employees ("Fellows") who are our most important assets turning this ambition into reality, while adhering to our code of conduct and high business ethics.

Sustainability covers Environmental, Social, and corporate Governance issues (ESG). The aim of F-Secure ESG Policy is to ensure our activities are aligned with our values, and demonstrate our commitments to protecting consumers and society, wellbeing of our Fellows and overall commitment to sustainable practices. ESG Policy also enhances a company's reputation as it communicates the organization's stance on ESG issues to external stakeholders, including investors, suppliers, customers, and the public. Furthermore, ESG Policy outlines our commitments to environmental stewardship, social responsibility, and ethical governance. Thereby, it provides clear guidance on how the business addresses ESG challenges and monitors progress.

Furthermore, ESG Policy will support F-Secure in driving ESG related improvements in our business in a transparent and proactive manner. We have already identified material ESG areas ("ESG Commitments") and have established governance and targets to create and drive ESG related actions within F-Secure.

Through these actions F-Secure will improve effectiveness of all material sustainability matters, which enables the company to make an impact on society, attract more talent, and grow.

This ESG Policy will ensure we fulfill legal requirements as well as stakeholder ESG requirements, managing impacts and risks, and fostering opportunities. The ESG Policy is based on the values and principles defined by F-Secure Code of Conduct.

2. Objectives

The objectives of this policy are to define:

- Main ESG principles
- Strategic objectives and how we engage in stakeholder dialogue
- Material focus areas for ESG agenda and activities, including how climate-related issues are integrated into business objectives and strategy
- ESG governance model and key responsibilities
- How F-Secure due diligence considers ESG impacts, risks and opportunities

2.1 Main ESG principles

ESG is not a separate strategy but incorporated in the company strategy and is part of normal business operations.

To implement this ESG Policy, F-Secure:

- complies with legal, regulatory and contractual requirements related to sustainability
- continuously improves sustainability target-setting and performance
- ensures required data quality and sufficient internal controls for internal and external reporting purposes
- engages stakeholders in active dialogue to understand stakeholder requirements
- has process in place to identify and assess material impacts, risks and opportunities
- integrates sustainability related performance in incentive schemes
- ensures level of ESG expertise of the administrative, management, supervisory bodies and workforce
- is committed to transparent communication and reports annually on its sustainability performance as part of the annual sustainability statement which has been audited by independent third party.
- is committed to fostering its corporate culture in a systematic and sustainable way. Culture means to us the ways we think and act to pursue our vision and goals as an F-Secure team. We see that culture affects what we can achieve together, concretizes in our daily behaviors, and that all employees play a significant role in building and living up to our culture. Through values and related behaviors, we want to enable the success and well-being of the company and the work community, teams, and individuals.

2.2 Strategic objectives and stakeholder dialogue

With the increasing emphasis on sustainability and ethical business practices set by investors, partners, customers, Fellows, and regulators, ESG topics are an integral part of F-Secure business strategy.

We will continuously evaluate the developments of the ESG agenda both on the legislative as well as on the stakeholder side, updating our strategy, actions, measures and targets, and policies accordingly.

The F-Secure way of operating responsibly is defined in our code of conduct and includes an open dialogue with our stakeholders to continuously identifying their views and needs. This includes, for example, annual stakeholder surveys to systematically monitor our stakeholders' views on ESG matters.

We follow the legislation and public dialogue in the countries where we operate. Through these actions we ensure that we are providing relevant information to our stakeholders and meet their requirements aligned with our strategy.

F-Secure has targets and metrics set for all strategically important ESG topics, which have been identified in the double materiality assessment (see chapter on "material focus areas"). The targets are time-bound and outcome-oriented and we report on our progress as part of our annual sustainability report.

2.3 Material focus areas for ESG activities

At F-Secure we conduct regular review and improvement of the Double Materiality Assessment (DMA) to ensure that the identified ESG topics remain relevant, reflecting emerging trends and stakeholder concerns. The topics identified as material for F-Secure February 2024 are Climate change, Own workforce, Consumers and End-users, and Business conduct. More detailed information on management of the topics is available in the subchapters below.

2.3.1 Management of Climate Change

At our core, we're a low carbon emission, cyber security software-as-a-service company with a small environmental impact. F-Secure climate change mitigation efforts are in line with the Paris Agreement (or an updated international agreement on climate change) and compatible with limiting global warming to 1.5°C.

To ensure F-Secure climate related activities and targets are defined, we have established an Environment Committee. F-Secure Climate change policy defines the related objectives and

principles.

2.3.2 Management of Own Workforce

Our employees or "Fellows" are the key to our success. Focus on talent development and well-being is a priority at all levels of the organization. Our activities center around both retaining our current Fellows and creating a positive employer brand image to attract new talent. To build a diverse and inclusive workforce we have established Diversity, Equity, and Inclusion (DEI) Committee.

Additionally, the well-being of our Fellows is critical for the success of F-Secure. We will continue to develop and implement an active wellbeing strategy and measuring progress. Similar to our Diversity, Equity, and Inclusion (DEI) efforts, we have established an F-Secure Culture, Health & Wellbeing Committee. The policies listed in the appendix linked to Own Workforce cover the related objectives and principles in more detail.

2.3.3 Management of Consumers and end-users

Our material impact on society is to protect consumers' digital moments and increasing trust on digital services. We execute on our vision and aim to become the consumer's trusted companion through several means such as:

- holistic protection across consumers' digital moments that provides a sense of security.
- contextual and personalized experience that makes security visible during relevant digital moments and relevant to consumer needs.
- helping consumers be aware and empowered to stay safe online, and providing advice and support when consumers need it.

The policies listed in the appendix linked to Consumers and end-users cover the related objectives and principles in more detail.

2.3.4 Management of Business conduct

We follow the good business practices and ethical principles defined in F-Secures Code of Conduct. We work within the framework of competition laws and competition instructions. F-Secure Cyber Security Policies include processes to identify, mitigate and prepare for a potential business disruption, and our Code of Conduct set a clear framework guiding our daily decision-making. At F-Secure, each employee or "Fellow" plays a critical role in earning, building, and maintaining the trust placed in us. We never accept or give bribes or other forms of improper payment for any reason. The policies listed in the appendix linked to Business conduct cover the related objectives and principles in more detail.

2.4 Key roles for ESG governance

At F-Secure, responsibility for ESG covers all levels of the organization including the Board of Directors and Audit Committee, and the President and CEO assisted by the Leadership Team. ESG issues are reviewed regularly at all levels of the company. ESG agenda and management is company strategy driven and based on our values, Code of Conduct, and ESG-related policies and processes.x§

The Leadership Team establishes company strategy, which ESG is part of and is approved by the Board of Directors. The ESG Council lead by the ESG function lead is responsible for facilitating and implementing the ESG strategy, including alignment with necessary company processes.

The annual sustainability statement is prepared by the ESG Council in collaboration with required functions. The Audit Committee reviews the preparation of the sustainability statement including identification of the material topics to be covered by the statement and implementation of sustainability statement assurance with external auditor. The Audit Committee presents the results of the sustainability statement to the Board of Directors with specifications on how the assurance has increased the credibility of the statement and what the Audit Committee's role has been in the assurance process.

Control over sustainability matters is organized and formalized through policies, principles, and processes. ESG policies and principles are proposed and developed by the ESG council and approved by the CEO or the Board depending on policy. Audit Committee reviews the policies presented to the Board and the Code of Conduct is approved by the Board. Remuneration policy is approved by the shareholders meeting every four years at a minimum. The complete list of ESG related policies and principles can be found in Appendix 1, Policies related to ESG.

We regularly review our governance structures and the processes. F-Secure ESG governance structure as of February 2024 is described in the Figure 1. ESG Governance matrix.

Board of Directors	Reviews and approves the company's strategy, business model and related targets, which include ESG. ESG progress and achievements reported to the Board annually. The board reviews remuneration policies aligned to ESG requirements.		
Audit Committee	Review ESG strategy Review sustainability related policies including ESG reporting, Corporate Governance, Cyber Security, and Risk Management Other duties assigned to AC under applicable law relating to sustainability reporting		
Leadership Team	Responsible for establishing and reviewing company ESG strategy and business model Ensures that ESG is part of company culture and approves policies and principles Risk Management review conducted minimum twice a year Reviews annual sustainability statement, targets and metrics		
F-Secure ESG Council	Identify and assess ESG impacts, risks and opportunity Develop and implement ESG strategies and preparation of annual sustainability statement Propose targets and metrics, and develop policies & principles Drives ESG compliance, and provides views on certifications and standards Ensures required stakeholder engagement in matters related to ESG	**ESG Function** Leading ESG Council and facilitating ESG strategy execution and reporting. Together with Legal function ensures ESG activities meet regulative requirements.	**General Counsel** Align ESG governance with the overall corporate governance and Code of Conduct and other relevant policies.

ESG Committees				**Topics covered by ESG council**	
DEI Reviews and sets ambition on DEI related plans. Evaluates and provides feedback on progress.	**Culture, Health & Wellbeing** Reviews and sets ambition on H&W related plans. Evaluates and provides feedback on progress.	**Donations & Sponsorship** Reviews and set principles for allocations of corporate donations and sponsorship.	**Environment** Driving environmental initiatives and climate change related targets.	**Customers and end-users** Reviews and sets ambition on stakeholder ESG. Specific task force appointed.	**Business conduct** Ensure that ESG governance is aligned with the overall corporate governance and Code of Conduct.

Figure 1 ESG Governance matrix

2.5 F-Secure due diligence considers ESG impacts, risks and opportunities

As part of F-Secure ESG due diligence we identify, prevent, mitigate, and account for how we have addressed actual and potential negative impacts connected to our business. It includes negative impacts connected to our own operations and value chain, our offering and business partners. At F-Secure due diligence is an ongoing practice that responds to and may trigger changes in our ESG governance, strategy, business model, activities, business partners, operating, sourcing, selling and context.

The material impacts, risks and opportunities have been identified and described in F-Secure Double Materiality Analysis. The ESG Council is responsible for the identification and assessment of impacts, risks, and opportunities (IRO) in minimum twice a year. The IRO findings are shared with the Audit committee for review. The risk management, including negative impacts, is conducted in

accordance with F-Secure Risk management principles and part of F-Secure risk review which is conducted minimum twice a year.

In addition to risk and negative impact, the ESG assessment adds two further dimensions of positive impacts and opportunities which are embedded into the strategy process including all material sustainability matters. The Audit Committee monitors and evaluates risk management, internal controls, ESG reporting as well as independent assurance. In addition, the relevant committees are informed on IRO analysis results and support in developing required actions and transition plans. We track the effectiveness of the impacts in the ESG Council and communicate the actions taken on annual basis as part of our sustainability statement.

We develop our ESG reporting process and controls in terms of data and reporting quality, transparency, and accountability. When a new measure or target is implemented the need for a new control is assessed and implemented if risks related to data management is identified. F-Secure aims to effectively manage ESG impacts, risks, and opportunities that are material to our business. We want to develop more reliable, relevant, and comparable data, which enables us to improve our sustainability agenda for the future.

Appendix 1: Policies related to ESG

F-Secures ESG Policy defines our ambitions and priorities for ESG. F-Secure has sound policies and specifying instructions guiding the operations in the areas of environmental matters, social matters, including own workforce and customers and end-users, and business conduct and governance matters as listed in Table 1.

	Climate change	Own workforce	Consumers and end users	Business conduct	Risk management and internal controls
Code of conduct	X	X	X	X	X
Recycling policy	X	X			
ESG policy	X	X	X	X	X
Climate change Policy	X				
Cyber Security Policy		X	X		X
Procurement and Supplier Security Policy				X	X
Personal Data Policy				X	X
Recruitment Policy		X			
Employment Policy		X			
Diversity, equity and inclusion Policy		X		X	
Health and safety Policy		X			
Learning and Development Policy		X			
Rewards and recognition Policy		X			
Global travel Policy		X			
Remuneration Policy		X		X	
Internal audit policy				X	X
Anti-bribery and Corruption Policy		X		X	X
AI Policy		X	X		
Supplier code of conduct	X			X	X
Whistleblowing Policy		X		X	X
F-Secure Risk management policy				X	X

In addition to the policies listed above F-Secure has a number of complementary procedures and guidelines that offer more practical instructions on the implementation of the policies.