
2025
SUSTAINABILITY
AT GASUM

Driving the energy transition – Gasum's 2025 sustainability journey

This review highlights and examines the company's sustainability progress and challenges in 2025. Gasum's sustainability report has, for the first time, been prepared in accordance with the CSRD.

Our commitment to the energy transition is at the core of our business strategy and daily operations. Gasum is a Nordic energy company, that offers cleaner energy and energy market services for businesses and cleaner fuel solutions for road and maritime transport.

Gasum's purpose is cleaner energy – we drive the energy transition for a sustainable future. By scaling up cleaner energy solutions, we are not just responding to change – we are driving it forward together with our customers and partners.

At Gasum, our role is to help our customers reduce their own emissions and offer low emission services to their customers. Our respect for both people and the planet is one of our core values.

Environmental data assured by a third party

This document provides an overview of our company's progress and targets on our journey toward a more sustainable future. The year 2025 was eventful for Gasum, with both positive development, as well as challenges. For example, our customers chose biogas over fossil alternatives more often than ever before. On the other hand, we have had to tackle issues regarding work safety.

For the first time, Gasum's sustainability report has been prepared in accordance with the European Union's Corporate Sustainability Reporting Directive (CSRD). Following the directive is voluntary for Gasum. The environmental section of this report has been assured by a third party to ensure robustness of our environmental data and performance disclosures.

We encourage all our stakeholders – employees, partners, customers and others – to review our progress through this report and continue to collaborate with us in improving our sustainability performance in 2026.

Sustainability highlights 2025

BIOGAS PRODUCTION

910 GWh

of biogas produced – up from 768 GWh in 2024.

BIOGAS DELIVERIES

2.7 TWh

of biogas delivered to customers – up from 2.1 TWh in 2024.

CARBON HANDPRINT

759,000

tons of CO_2 emission savings enabled with biogas – up by 9% from 2024.

CIRCULAR ECONOMY

Almost

1.5 million

tons of different types of waste managed through biogas production. Up from 1 million in 2024.

SHARE OF RENEWABLES

34%

of total volumes of energy sold were renewable (biogas and power) – up from 19% in 2024.

BIOGAS SUSTAINABILITY

96%

average reduction of CO_2 emissions for biogas produced by Gasum – up from 93% in 2024.

RENEWABLE ELECTRICITY

6.1 TWh

worth of renewable electricity Guarantees of Origin traded – up from 5.1 TWh in 2024.

PROACTIVE SAFETY CULTURE

951

safety walks performed throughout Gasum's sites.

We support the UN SDGs

Gasum is a signatory of the UN Global Compact

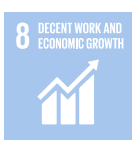
"The Sustainable Development Goals (SDGs) were adopted by the United Nations in 2015 as a universal call to action to solve by 2030 the urgent economic, social, and environmental challenges facing our world. Gasum has identified six priority SDGs towards which we can contribute the most in our operations as a provider of cleaner energy.

Gasum joined the United Nations Global Compact initiative on corporate sustainability in 2021. The UN Global Compact is an international corporate sustainability initiative calling for businesses worldwide to adopt and implement ten principles relating to human rights, labor, environment and anti-corruption."

Gasum Group CEO
Mika Wiljanen

7 AFFORDABLE AND CLEAN ENERGY

We offer and develop low-carbon and renewable energy products and energy market services for our customers. Our investment outlook improves the availability of renewable energy. We increase access to cleaner fuels in the Nordics, above all in the maritime and heavy-duty road transport segments.



8 DECENT WORK AND ECONOMIC GROWTH

We respect human rights and promote the well-being, work ability and competence of our personnel. We have a strong safety culture and aim at zero harm for our employees and contractors.

9 INDUSTRY, INNOVATION, AND INFRASTRUCTURE

We develop infrastructure for cleaner energy. We advance innovations, build partnerships, and participate in the activities of various research and development networks in circular economy, cleaner energy, decarbonization and resource-efficiency.

11 SUSTAINABLE CITIES AND COMMUNITIES

We increase the availability of our low-carbon and renewable energy products for the transport and industry segments, which positively impacts the local air quality in urban areas. We help cities to be more sustainable with partnerships in circular economy and clean energy solutions.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

We treat a substantial share of society's biodegradable waste and residues and produce biogas and recycled nutrient products from it. We participate in activities promoting the further development of technologies, feedstocks, and partnerships in this field.

13 CLIMATE ACTION

We are committed to helping our customers reduce their climate emissions. We aim at a yearly 1,800,000 t CO_2 reduction for our customers with biogas by 2027 and develop to expand future decarbonisation pathways. We use 100% renewable electricity in all our operations and are committed to continuous energy-saving actions.

Sustainability program, KPIs and achievements

Our strategy provides the guidelines for our journey towards new business opportunities and sets the framework for our sustainability program.
The six material sustainability topics are based on the significance of the impacts on the company and the society.

	Material theme		Objective	KPI	2025	2024	2023	Target
ENVIRONMENT	Climate	Handprint of our products	Enabling GHG emission reductions for our customers	Cumulative GHG emission reduction for customers achieved with renewable gas (tCO_2e)	759,000	696,000	565,000	1,800,000 t CO_2e by 2027, calculated with EU RED2 methodology*
		Footprint of our operations	Decreasing greenhouse gas emissions	Scope 1 and 2 GHG emissions of operations per delivered unit of gas (tCO_2e/GWh)	6.15	3.45	5.28	Decreasing trend (LNG/LBG and biogas supply chains)
				Share of renewable electricity used in own operations (%)	100%	100%	100%	Maintain 100% renewable electricity procurement
				Energy intensity of operations (GWh/GWh)	0.066	0.035	0.039	1% decrease annually (LNG/LBG and biogas supply chains)
				Number of energy saving actions	31	36	30	At least 1 action per Gasum's terminal/plant annually (Total 21)
			Minimizing environmental impact	Number of environmental breaches (impact classified as considerable, severe or irreversible)	2	1	0	0 environmental breaches
				Number of energy and environment related observations and suggested improvements	245	240	238	Increasing trend
	Circular economy	Biogas and recycled nutrient products	Promoting circular economy	Increased availability of biogas in the Nordics (TWh)	2.7	2.1	1.7	7 TWh (HHV) by 2027*
				Sustainable biogas production (% GHG reduction, RED 2)	96%	93%	92%	95% by 2027 (Avg. CO_2 emission reduction of own production)
SOCIAL	Safety and security	Zero harm	Ensuring safety for employees and contractors	LTI (lost-time injury), own employees and contractors	12	3	4	0 LTI
				TRIF (total recordable injury rate), own employees and contractors	28.1	12.2	16.6	10 by 2027
				Number of safety walks	951	290	453	At least 2 per site annually (Total 280)
				Participation in Gasum Safety e-learning training (%)	84%	73%	76%	100% of active employees participate
	People	Well-being	Promoting a healthy working environment	Absence rate (%)	2.50%	2.19%	1.74%	<2%
		Leadership and culture	Developing Gasum culture and employee experience	Development of employee experience with continuous pulse survey	71%	66%	69%	Min 70% of employees participate in survey
		Personal development	Growing professional talent	Development discussions are held (%)	95%	96%	97%	100% of permanent and active employees
ECONOMIC	Access to cleaner energy	Sustainable products and services	Enabling sustainable solutions for traffic, maritime and industry	Share of renewable energy (incl. biogas and power reported in GWh, %)	34%	19%	25%	45% by 2027
	Responsible business	Supply security	Ensuring reliable energy supply	Zero unplanned interruptions in energy supply to maritime, traffic and industry customers Availability of filling stations to traffic customers	99.7% 98.9%	99.9% 99.04%	99.9% 99.5%	Delivery performance 99.9% Availability 99% (average for filling stations)
		Business ethics and compliance	Ensuring compliance and accountability in own operations and in business partnerships	Employees: Participation in Gasum Code of Conduct e-learning training (%)	93%	71%	93%	100% of active employees participate
				Customers: Net Promoter Score (NPS), including all b-to-b customer segments	8	30	23	Increasing trend
				Suppliers: Continuous supplier assessments and auditing based on systematic risk approach	6	No audits	No audits	Critical suppliers identified and evaluated. Suppliers with low scores audited.

* Target in accordance with Gasum's previous strategy in force until the end of 2025.

Gasum sustainability report 2025

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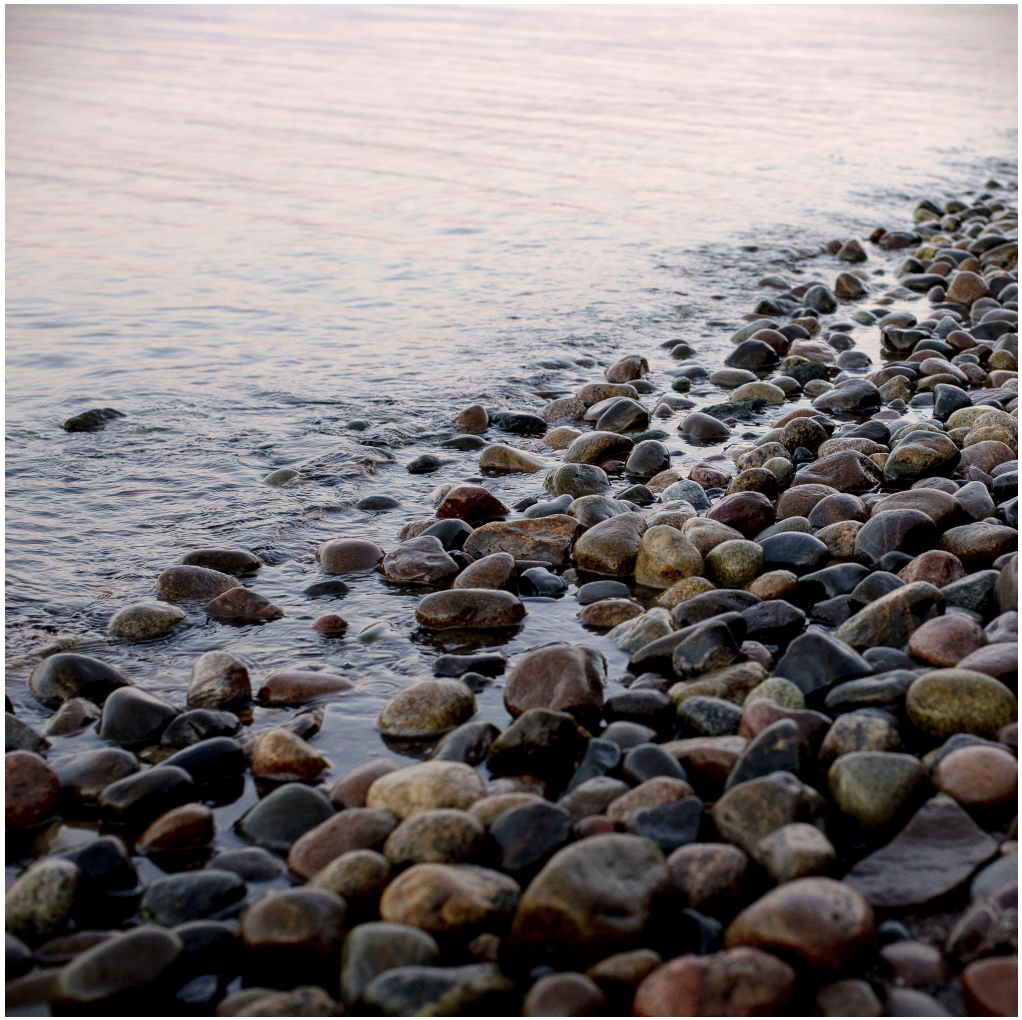


General information

ESRS 2 - General disclosures

BP-1 General basis for preparation of the sustainability statement

Gasum Group's Sustainability report provides information on environmental, social, and governance (ESG) matters. It has been prepared in accordance with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), covering the financial year 1 January–31 December 2025. This report aims to provide transparent and comparable insights into the sustainability topics that are most relevant to Gasum's operations and stakeholders.

Unless otherwise specified, the scope of this report aligns with Gasum's consolidated financial reports prepared under IFRS, covering Gasum Oyj and its subsidiaries in which the Group holds more than 50% of voting rights. In operations where Gasum does not have full control – particularly in regard to operating policies, governance, and risk management – most ESRS requirements are not fully applicable. Further information on the Group structure is available in Gasum's Financial Report for the year 2025.

The information in the sustainability report is reported on the Group level. Where relevant, upstream and downstream value chain information is included to provide a complete view of the material impacts, risks, and opportunities affecting the company, in line with the double materiality principle.

As allowed under transition rules for first-time reporters, value chain metrics and prior-year comparisons have been omitted. Gasum has not used the option to omit specific information relating to intellectual property, know-how or results of innovation.

This Sustainability Report has been externally assured by Deloitte Oy. A Limited Assurance engagement was performed over ESRS E1 climate Change and ESRS E5 Resource use and circular economy, applying the ESRS framework and the criteria set forth in the delegated acts of the EU Taxonomy Regulation. In addition, the following metrics have been assured as part of Gasum's revolving loan facility requirements:

- Renewable gas sold: The increase of the total of renewable gas (TWh) sold by Gasum.
- Sustainable biogas production: The percentage reduction on a well-to-wheel basis of average greenhouse gas emission of the biogas produced by Gasum in its own production facilities as compared to fossil-based fuel calculated in accordance with Renewable Energy Directive EU/2018/2001 (as amended and/or replaced from time to time)
- Total recordable injury rate: The decrease of the total recordable injury rate (TRIF) of Gasum's own employees and contractors calculated with the following formula and accidents resulting in at least one day off work: TRIF = (number of injuries / total hours worked)x 1,000,000

This report is the first prepared under the ESRS framework. In line with first-year implementation, certain disclosures do not include 2024 comparative figures in the tables. Gasum will present comparatives in future reports once a full prior-period data set is available.

BP-2 Disclosures in relation to specific circumstances

Time horizons

Gasum has applied time horizons that are those defined in ESRS 1 section 6.4 in its double materiality assessment. For risk-related disclosures, short-term is defined as up to one year, medium-term as two to five years, and long-term as over five years.

Estimation and outcome uncertainty

Several reported metrics involve a degree of estimation or judgement, particularly those related to:

- Judgement and forward-looking information used in the identification and scoring of sustainability impacts, risks and opportunities, as well as in determining the threshold for material topics
- Estimates and forward-looking information used in valuing the anticipated financial effects from sustainability risks and opportunities
- Where upstream and downstream value chain data is reported, Gasum has used estimates based on emission factors aligned with the GHG Protocol. These estimates involve assumptions, proxies, and third-party data, which may limit accuracy

Use of other frameworks

The sustainability statement is aligned primarily with ESRS, but certain methodologies, such as greenhouse gas emission calculations under the GHG Protocol and reduction calculations

under the EU Renewable Energy Directive (RED), draw on internationally recognized standards.

Use of phase-In provisions

Gasum is taking advantage of the following exemptions listed in ESRS 1 section 10 and Appendix C:

- Omission of comparative information
- Deferral of anticipated financial effects (SBM-3, E1-9)
- Exclusion of certain value chain disclosures (ESRS S)

A full list of applied phase-in exemptions and relevant topics is provided in section ESRS 2 IRO-2 p. 20.

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

The General Meeting of Shareholders, the Board of Directors and the CEO form the basis of Gasum's governance. The CEO is supported by the Gasum Management Team (GMT). The CEO and GMT are further supported by Gasum's internal experts on various sustainability topics as well as internal and external audit functions. The duties of the company's bodies and functions are determined in accordance with the relevant legislation, most importantly the Finnish Companies Act, as well as with the Gasum Group Corporate Governance Policy.

Board of Directors

The Board of Directors is ultimately responsible and oversees the administration of the company and the appropriate organization of its operations, as well as the appropriate arrangement of the company's accounts and finances. The Board of Directors also makes major decisions, for example, relating to the company's strategy, Code of Conduct and other significant group policies as well as major investments and divestments.

The Board of Directors has established two Board committees to support its work, the Audit and Risk Committee and the HR Committee. During 2025, each committee had three members with suitable expertise in the topics covered by the relevant committee. The Board and each of its committees have adopted written charters guiding their work and the Board assesses its work annually, taking into account also the adequacy of the expertise and competence of the Board as a whole.

The Audit and Risk Committee

The task and purpose of the Audit and Risk Committee is reviewing and preparing for the Board matters relating to finances, sustainability reporting, internal audit and risks. Focal areas in the Committee's tasks are financial administration, financial and sustainability reporting processes, financial audit, risk management and internal audit. The Audit and Risk Committee has a preparatory role relating to sustainability reporting.

The HR Committee

The HR Committee's tasks include reviewing and preparing for the Board matters relating to personnel and remuneration and supervising the composition of the Boards of Directors of Gasum subsidiaries. The Committee's responsibilities include the assessment of the human resources strategy and remuneration system and of the performance of the company's management.

Diversity and composition of the Board of Directors

The Board of Directors consists of six members. Two Board members are women and four are men. The ratio between women and men in the Board is thus 1:3. The Board members have held Board positions from 2 to 6 years. One Board member was replaced by a new Board member in December 2025.

None of the Board members are employees or other workers of the company. All Board members are independent of the company. One of the Board members is not independent of the State of Finland, the company's sole shareholder.

Expertise and competence of the Board of Directors

Each Board member holds a Master's degree (Master of Laws, Master of Economics, Master of Engineering or Master of Arts) and has varied and relevant professional background.

The Board members have considerable experience in and understanding of various sustainability and ESG-related areas, such as corporate governance, human resources, stakeholder and supply chain management, diversity and climate topics, policies and legislation.

Further, the Board members have considerable experience in several areas with key importance for Gasum's business operations, such as several energy sectors (both gas and

power), construction projects, green transition as well as finance, accounting and IT. The Board members also have good understanding of and experience in Gasum's major geographical operating areas, most importantly the Nordics and the EU.

The Board and its committees receive regular updates from the management and experts in the Gasum organization, as well as from internal and external audit functions, both concerning sustainability matters and other business matters.

The Board of Directors' sustainability expertise, supported by the management and internal experts, is also relevant regarding Gasum's material impacts, risks and opportunities, including for example climate change, resource use and circular economy, working conditions, business ethics, and supply security.

Where relevant, the Board of Directors and its committees request executive management to reserve time for and facilitate discussions and presentations on specific sustainability on other topics to ensure that they have sufficient and up-to-date understanding. The Board of Directors maintains an open action list to ensure that all requested topics are covered in Board work.

Duties of the Board of Directors and the executive management regarding the impacts, risks and opportunities of operations

The Board bears ultimate responsibility for sustainability matters in the company, including the related impact, risk and opportunity management. The Board committees support the Board's work in their relevant fields. The Board also oversees the double materiality assessment process with the assistance of the Audit and Risk Committee as well as approves the results of the double materiality assessment.

Gasum CEO is responsible for managing the day-to-day operations of the company and reports to the Board of Directors. The CEO is supported by the GMT, consisting of Gasum Unit Heads. The members of the GMT each have the responsibility to arrange their Unit's operations in accordance with the Gasum Code of Conduct and other Gasum policies and to promote the requirements and guiding values presented in the Code of Conduct, including, among others, respecting human rights and the environment, combatting climate change, maintaining fair workplace, quality excellence and regulatory compliance as well as excelling in health, safety and security.

The members of the GMT report to the CEO and, where needed, to the Board of Directors on their Unit's operations, including on the impacts, risks and opportunities and how they are managed. GMT and the Board's Audit and Risk Committee review the company's most important risks regularly together with the company's Risk Management function.

Gasum management has also established internal committees to manage impacts, risks and opportunities relating to, among others, the results of the company's double materiality assessment, in their focus areas. The Market Risk Committee focuses on tracking the company's overall risk exposures and reviewing risk reporting, among others concerning the company's risk management relating to commodities and renewable energy. The Treasury Committee focuses on treasury matters. The Information and Cybersecurity Committee focuses on overseeing the company's information and cybersecurity as well as data protection measures. Where relevant, matters handled by the internal committees are reported to the Board and its committees.

The Board of Directors sets out the company's high-level climate and sustainability targets. The executive management sets out more detailed targets and arranges operations so that Gasum employees' personal targets are in line with the company targets.

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

As Gasum is an energy company with major and increasing focus in producing and delivering renewable energy to its customers, sustainability is at the core of Gasum's strategy. Since Gasum's business includes the operation and construction of several biogas production plants and other operative facilities, health, safety and security matters are also a major focus in both Gasum's day-to-day work and management on all levels. In line with this strategic focus, sustainability matters are frequently on the agendas of Gasum's Board of Directors and its committees as well as the GMT.

During the reporting period, various sustainability-related topics were handled by the Board of Directors and its committees, including among others the following:

- Preparation of and preparedness for the sustainability report
- Approval of the results of the double materiality assessment

- Approval of the climate transition plan
- Review and update of risk policies, the Group Corporate Governance Policy and the Code of Conduct, and approval of the new Human Rights Policy and Anti-Bribery and Corruption Policy
- Approval of remuneration sustainability targets for next year
- Regular updates of the progress of sustainability targets and of other sustainability matters from the sustainability team
- Regular strategy updates from the strategy team and relevant internal stakeholders
- Regular risk reviews with Risk Management function
- Regular safety culture updates from CEO and HSEQ team
- Deepdives and learning sessions relating to several cleaner energy-related topics from internal experts, such topics including biogas, the FuelEU Maritime regulation and other topical regulation
- Review of culture and people KPIs with HR function
- Review of the Governance and Remuneration Report

During the reporting period, the GMT handled in its meetings among others the following topics:

- Results of the double materiality assessment
- Climate transition plan
- Regular sustainability updates
- Practices and principles relating to procurement and supply chain management
- Practices, principles and monitoring relating to health, safety and security
- Monitoring of employee wellbeing based on the results of employee surveys
- Regular risk assessment and evaluation
- Remuneration target setting

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

The remuneration of personnel within the Gasum Group is based on the Group's remuneration principles and the remuneration principles laid out by the Ownership Steering Department of the Finnish Prime Minister's Office, as the company is wholly owned by the State of Finland. The company aims for a target-oriented company culture where the entire personnel understand the company's strategy and objectives, the ways in which individuals can affect results, and the connection between business performance and remuneration.

At Gasum, remuneration is based on total remuneration which in addition to the basic salary includes a short-term incentive program linked to company-wide and personal, financial and non-financial, targets.

In Gasum's short-term incentive (STI) program, the focus is on the Group's financial results, climate impact, and strategy implementation. STI objectives are defined and measured annually, ensuring alignment with both business priorities and sustainability targets. The STI plan includes climate-related targets, such as achieving emission reductions through biogas sales, which represent 20% of the total STI bonus. This portion is integrated into the bonus system for all personnel.

The Board of Directors decides on the remuneration of the management and personnel. Gasum's HR Committee makes proposals on the remuneration systems for the Gasum Management Team and the personnel, and these and the remuneration principles are confirmed annually by the Board of Directors.

GOV-4 Statement on due diligence

Gasum's Code of Conduct sets out the most important principles and requirements relating to the company's operations. It forms the basis of Gasum's sustainability due diligence by including several sustainability topics, such as respecting human rights and the environment, combatting climate change, maintaining fair workplace, quality excellence and regulatory compliance as well as excelling in health, safety and security. Each Gasum employee, as well as the members of the Board of Directors, are expected to complete the mandatory Code of Conduct online training as a part of their onboarding program and once every two years thereafter. Gasum has a whistleblowing channel that is open for all internal and external stakeholders. Gasum's Code of Conduct and other policies that have relevance from the point of view of sustainability due diligence, are described in more detail in section G1-1 on page 54.

Gasum requires that a counterparty due diligence is completed on all contractual counterparties before entering into commitments. The company has in place Procurement Principles setting out the framework and requirements for procurement activities, and the Code of Conduct for Business Partners, through which Gasum communicates its expectations toward suppliers and other stakeholders. Gasum's policies and actions relating to procurement are described in more detail in section ESRS S2 on page 49.

In connection with M&A activities, Gasum management always assesses the necessary due diligence scope together with the Legal function and other relevant Gasum functions and identified relevant due diligence measures are completed

before final acquisition decision. Such measures always include legal, financial and technical evaluation. Where necessary, external professionals are engaged to support the due diligence process.

In 2025, Gasum has focused on enhancing its human rights due diligence process by identifying and assessing its salient human rights risks, both within the company and as regards it supply chain. The Board of Directors also approved the new Human Rights Policy. Likewise, Gasum identified and assessed its salient anti-bribery and corruption related risks and the Board of Directors approved the new Anti-Bribery and Corruption Policy.

CORE ELEMENTS OF DUE DILIGENCE	PARAGRAPHS IN THE SUSTAINABILITY REPORT
a) Embedding due diligence in governance, strategy and business model	Material Impacts, risks and opportunities under General disclosure
b) Engaging with affected stakeholders in all key steps of the due diligence	Actions related to the topical standards.
c) Identifying and assessing adverse impacts	Targets related to topical standards.
d) Taking actions to address those adverse impacts	Material Impacts, risks and opportunities under General disclosure.
e) Tracking the effectiveness of these efforts and communicating	Policies related to topical standards. Stakeholder engagement in General disclosure

GOV-5 Risk management and internal controls over sustainability reporting

Gasum has established a structured risk management framework to ensure the reliability and integrity of its sustainability reporting. This framework covers the reporting process, including the accuracy of data, functionality of internal and external systems, and availability of required resources. The primary objective is to identify, assess and manage risks, enabling timely mitigation of potential deficiencies.

The risk assessment process is overseen by Gasum's sustainability team in conjunction with Group risk management, finance, and legal departments. Key findings are reported annually to the group management team, ensuring that appropriate oversight and follow-up actions are taken. This supports the company's sustainability objectives and strengthens internal accountability.

Gasum's risk prioritization model evaluates risks based on their potential impact and likelihood. The most significant risks currently relate to the evolving requirements under the Corporate Sustainability Reporting Directive (CSRD). These developments may require changes to the content and format of disclosures. Gasum actively anticipates changes by monitoring legislative developments and engaging with key stakeholders.

In terms of operational risks, the completeness and consistency of sustainability data is a key area of focus, especially where manual data collection from multiple systems is required. To address this, Gasum has strengthened internal instructions, refined process descriptions, and implemented controls to identify and correct errors early.

SBM-1 Strategy, business model and value chain

Gasum is an energy company that offers its customers biogas, liquefied biogas (LBG) natural gas, liquefied natural gas (LNG), power and energy market services. Gasum's customers are divided into three groups: industry, maritime and traffic.

The company's main geographic market area comprises Finland, Sweden and Norway. In 2025 Gasum Group's revenue was EUR 1,248 million. The vast majority of the company's revenue comprises biogas and natural gas sales. Customer group-specific figures are not reported in the company's financial statements.

Gasum provides industrial companies and other businesses with energy (biogas, natural gas and renewable electricity in the form of Power Purchase Agreements, PPAs) as well as energy market services, such as multi market optimization (MMO).

To its customers in the maritime and land transportation (traffic) groups Gasum offers biogas and natural gas in their compressed (CBG, CNG) or liquefied (LBG, LNG) forms. In the maritime group customers are spread across a wider geographic area, comprising mostly North-Western Europe.

Gasum additionally offers companies and the public sector circular economy services in the form of waste management at its biogas plants. Organic waste streams such as agricultural waste, manure, sludge and household biowaste are used to produce biogas as well as recycled fertilizers and nutrients.

Gasum owns and operates a total of 19 biogas plants in Finland, Sweden and Denmark and a network of over 120 gas filling stations across Finland, Sweden and Norway. Gasum is fully owned by the state of Finland and has around 380 employees in Finland, Norway, Sweden, Germany and Denmark. The number of employees in each country is presented under ESRS S1-6 Characteristics of the undertaking's employees.

In addition to its own biogas production, Gasum sources biogas from certified European partners. Other significant upstream value chain suppliers include natural gas suppliers and suppliers for feedstock used in biogas production.

Gasum's strategy is based on a complete end-to-end value chain in biogas, natural gas and renewable power. Natural gas and its liquefied form LNG is a stepping stone while transitioning to its renewable alternative biogas in the industry, maritime and traffic groups.

Gasum's ambition is to support its customers in the energy transition by providing cleaner energy and energy market services. A circular economy and renewable energy production are at the center of Gasum's strategy.

At the end of 2025 Gasum underwent a strategy update process and a renewed strategy is being implemented from the start of 2026.

Summary of Gasum's main products and services and the related customer segments

PRODUCT	CUSTOMER SEGMENT(S)
Biogas, liquefied biogas (LBG)	industry, maritime, traffic
Natural gas, liquefied natural gas (LNG)	industry, maritime, traffic (in the Swedish market)
Power & energy market services	industry
Circular economy solutions	industry (as well as public sector)

SBM-2 Interests and views of stakeholders

Stakeholder collaboration within Gasum is primarily defined by the theme and form of collaboration as well as the stakeholder group. Stakeholder collaboration is a central element in Gasum's functions responsible for sales, marketing, communications, public affairs, sustainability as well as many other expert functions. Gasum's whistleblowing channel is openly available to all of the company's stakeholders.

Stakeholders were engaged in Gasum's double materiality analysis process and sustainability program development. The results of the engagement were reported to the management as well as to the Board of the company. The most salient themes for stakeholders were climate, circular economy and safety.

Gasum's business functions engage with customers and business partners on a daily basis. Both customer satisfaction and sales performance are measured continuously through a digital tool and results are always available in real time.

The company's stakeholders include entities that have an impact on the business, or are affected by Gasum's activities, products, and services. Gasum expects responsible business practices from its suppliers and subcontractors, conducts supplier evaluations, and gives safety training to contractors and logistics service providers.

Public authorities and policymakers at various levels, from local and national to EU institutions, are also relevant to Gasum's business. The company communicates openly with the media and non-governmental organizations and engages with local communities in contexts such as infrastructure investment projects.

The main purpose of stakeholder engagement is to gain insights that help Gasum to develop its business, gain knowledge on how Gasums products, services and operations affect its stakeholders, pinpoint areas of improvement and advance renewable energy adoption. The outcome of stakeholder engagement is used to guide and improve Gasum's operations, communications, strategy and business model.

Gasum participates in programs, networks, and associations such as:

- Avfall Sverige - Swedish Waste Management
- Baltic Sea Action Group (BSAG)
- Bioenergy Association of Finland
- Biogas Research Solutions Center at Linköping University, Sweden
- Biogas Öst, Sweden
- Biogas Syd, Sweden
- Cleantech Östergötland, Sweden
- CLIC Innovation Ltd

- Climate Leadership Coalition (CLC), Finland
- Eurogas
- European Biogas Association
- FIBS (Finnish Business and Society corporate responsibility network)
- Finnish Gas Association
- Finnish Energy
- Finnish Hydrogen Cluster
- Grønt Landtransportprogram – partnerbedrift, Norway
- Partnership Alnarp, Sweden
- SEA-LNG
- Society's Commitment to Sustainable Development, Finland
- The Norwegian Gas Association
- The Society for Gas as a Marine Fuel
- The Swedish Gas Association
- UN Global Compact
- World Energy Council WEC Finland

Gasum's key stakeholder groups and engagement

STAKEHOLDER GROUP	ENGAGEMENT
Customers	Meetings, webinars, newsletters Trade fairs Satisfaction survey (NPS)
Employees	Development discussions Info sessions Pulse survey Trainings
Suppliers and contractors	Supplier audits Code of Conduct for Business partners Trainings
Local communities	Local public planning meetings Meetings with local authorities Media
Non-governmental organizations	Joint programs Meetings
Trade organizations	Joint statements, campaigns Meetings and events
Public authorities and policy makers	Information sharing, events Commenting on policy drafts Meetings
Financiers	Information sharing Meetings

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

Material impacts, risks, and opportunities have been identified for each material topic, that primarily arise within Gasum's own operations and upstream value chain. Further details, including expected timeframes and relevant value chain locations, are described on p. 17.

Climate change

Gasum's strategy is rooted in supporting the energy transition by providing renewable and low-emission energy solutions. As a key player in the Nordic energy sector, Gasum focuses on biogas production, LNG and LBG distribution, and circular economy services that reduce greenhouse gas emissions and fossil fuel dependency. While Gasum aims to progressively replace fossil energy with renewable alternatives such as biogas, fossil-based energy products continue to form part of the company's portfolio and play a role in ensuring energy security and a reliable transition pathway for customers.

Material climate impacts are linked to emissions from Gasum's own operations and upstream activities, particularly methane (CH_4) and carbon dioxide (CO_2) emissions from biogas production and distribution and fossil-based energy. However, Gasum also contributes significantly to decarbonization by replacing fossil fuels with renewable gas in transport and industry, thereby reducing GHG emissions.

Risks include physical risks (e.g. extreme weather disrupting infrastructure) and transitional risks (e.g. evolving EU climate policy or delayed transition planning). These factors may affect Gasum's operational continuity, cost structure, and competitive positioning. In response, the company is scaling up biogas production, investing in innovation, and linking sustainability performance to financing through sustainability-linked loans.

Gasum's impacts, risks, and opportunities span from the short to long term. Through long-term partnerships and

infrastructure development, Gasum supports resilience and strengthens its role in a low-carbon energy system. By aligning its business model with climate objectives, Gasum enhances its ability to manage transition-related risks while capturing growth opportunities in a changing energy market.

Resource use and circular economy

Gasum's strategy is built around circular economy principles, particularly through biogas production and nutrient recovery from feedstock. Material impacts, risks, and opportunities identified include the use of feedstock inputs such as sewage sludge, biowaste, and industrial side streams, which reduce environmental pressure from landfilling and incineration. These activities support national and EU targets on waste reduction and resource efficiency.

Most impacts arise upstream, where feedstock is sourced from municipalities and industry, and continue downstream through the supply of biogas and recycled nutrients to sectors like transport and agriculture. These contribute to reduced use of mineral fertilizers and improved soil condition. However, insufficient integration of zero-waste practices could pose regulatory and reputational risks.

Gasum actively assesses the availability of suitable feedstocks to ensure that each processing site operates with the most appropriate raw materials. This supports both operational efficiency and environmental performance. The company also invests in the development of processing technologies and works closely with partners to ensure the safe and compliant use of recovered materials, supporting long-term resilience and alignment with the transition to a circular economy.

Although the volume of waste generated in Gasum's production is small compared with the amount of feedstock processed, the appropriate handling and treatment of these waste streams remain important to minimize environmental impacts and ensure compliance.

Own workforce

Gasum's workforce plays a critical role in its long-term success, especially in the highly technical and regulated energy sector. The company's double materiality assessment identified key workforce-related impacts across occupational health and safety, employment practices, and working conditions.

Gasum creates positive impacts by offering secure, long-term employment to around 350 professionals across the Nordics. Most employees have permanent contracts and access to broad occupational health services, supporting wellbeing, work-life balance, and operational continuity.

Negative impacts may arise from health and safety risks such as workplace accidents, production incidents, or site-specific hazards –-even with preventive safety measures in place. These are most concentrated in the company's own operations, particularly at biogas plants and terminals. Similarly, there is a risk of discrimination or harassment, despite Gasum's zero-tolerance policies and proactive counter measures.

In response, Gasum has implemented robust health and safety procedures, regular training, and internal reporting channels. Gasum's strategy includes a strong focus on safety culture, continuous training, and compliance with national labor laws and regulations.

Value chain

Gasum depends on a network of partners and contractors, particularly in upstream value chain activities in biogas production, terminals and logistics. Workers in this part of the value chain may be exposed to material health and safety risks, including potential accidents and incidents due to the nature of the operational work.

To address this, Gasum enforces strict safety standards, requiring contractors to follow health and safety protocols through contracts, training, audits, and reporting. Health and safety are integral to Gasum's risk management, helping protect workers and ensuring business resilience.

Business ethics

Business conduct is central to Gasum's responsible operations. The company's ethical standards, corporate culture, and compliance program foster trust, legal compliance, and strong business relationships. Supplier management presents additional risks if there is low awareness of sustainability or regulatory duties, potentially leading to legal breaches or financial losses. Non-compliance incidents, such as bribery or corruption, can harm reputation and disrupt operations.

To mitigate these challenges, Gasum employs supplier due diligence, monitors geopolitical risks, and requires adherence to its Code of Conduct. Ongoing training, internal controls, and a culture of integrity reinforce these efforts, supporting the company's strategy and resilience.

In total, Gasum identified 26 material impacts, risks and opportunities across five ESRS topics. Each item is addressed in the relevant sections of this statement.

Summary of the material topics

ESRS	Topic	Description	Impact, risk or opportunity	Time horizon	Location in value chain
E1 – Climate change	Climate change mitigation	GHG emissions of the value chain	Actual negative impact	Short, medium and long term	Value chain
E1 – Climate change	Climate change mitigation	CO_2 and methane emission reduction through biogas use or waste management (handprint)	Actual positive impact	Short, medium and long term	Downstream
E1 – Climate change	Climate change mitigation	Sustainability-linked revolving loan KPI: Renewable gas sold.	Actual positive impact	Short term	Value chain
E1 – Climate change	Climate change mitigation	Sustainability-linked revolving loan KPI: sustainable biogas production, CO2 emission reduction, %	Actual positive impact	Short term	Own operation
E1 – Climate change	Energy	Energy use in own operations	Actual negative impact	Short term	Own operation
E1 – Climate change	Climate change mitigation	Increased severity of extreme weather events and permanent changes in weather patterns, e.g. rising sea-level causing interruption in deliveries and increase in insurance premiums	Risk	Long term	Upstream, own operation
E1 – Climate change	Climate change mitigation	No clear transition plan and actions towards it in place or activities towards targets	Risk	Short term	Own operation
E1 – Climate change	Climate change mitigation	New potential regulations impacting operations e.g. through fuel quality directive	Risk & opportunity	Long term	Value chain
E1 – Climate change	Climate change mitigation	Preparing for green transition (carbon handprint)	Opportunity	Long term	Own operation
E1 – Climate change	Climate change mitigation	Not able to reach cleaner society targets and keep up with R&D and investments in new technologies and transition to lower emissions technology	Risk	Long term	Value chain
E1 – Climate change	Climate change mitigation	Adding value to customers by providing renewable energy that is produced nearby (biogas)	Opportunity	Long term	Value chain
E5 - Resource use and circular	Resource inflows, including resource	Use of biowaste, wastewater and sewage sludge and residues in biogas and recycled nutrient production	Actual positive impact	Short term	Own operation
E5 - Resource use and circular	Resource outflows	The appropriate handling and treatment of waste streams to minimise environmental impacts and ensure compliance.	Potential negative impact	Long term	Own operation

S1 – Own workforce	Working conditions	Permanent contracts allow for stable and predictable working hours which can enhance job satisfaction, work-life balance, and productivity.	Actual positive impact	Short, medium and long term	Own operation
S1 – Own workforce	Working conditions	Gasum has wide occupational health coverage and preventative measures in place.	Actual positive impact	Short, medium and long term	Own operation
S1 – Own workforce	Working conditions	Potential health and safety incidents and accidents e.g. through production incidents or fire on-site	Potential negative impact	Short, medium and long term	Own operation
S1 – Own workforce	Equal treatment and opportunities for all	Discrimination, inappropriate behavior or harassment might occur despite active measures and zero tolerance. Impact is lower employee morale and productivity, increased legal liability, and potential harm to individuals and to the company's reputation.	Potential negative impact	Short, medium and long term	Own operation
S1 – Own workforce	Working conditions	Serious or fatal injuries to employees might occur despite active efforts to identify, mitigate, and manage safety-related risks.	Risk	Short, medium and long term	Own operation
S2 – Workers in value chain	Working conditions	Potential health and safety incidents and accidents in value chain. Sustainability-linked revolving loan KPI: The decrease in the TRIF of Gasum's own employees and contractors	Potential negative impact	Short, medium and long term	Upstream
S2 – Workers in value chain	Working conditions	Gasum requires safety measures and actions from its suppliers.	Actual positive impact	Short, medium and long term	Upstream
S2 – Workers in value chain	Working conditions	Serious or fatal injuries to value chain employees might occur despite active efforts to identify, mitigate, and manage safety-related risks.	Risk	Short, medium and long term	Upstream
G1 - Governance	Business ethics	Lack of transparency related to sourcing can lead to negative customer purchasing decisions and reputational issues.	Risk	Medium term	Own operation
G1 - Governance	Business ethics	Poor management of suppliers & awareness of sustainability-related risks in their operations could have a financial impact on e.g. fees, investigation costs, changing suppliers.	Risk	Medium term	Own operation
G1 - Governance	Corruption	Failure in compliance management, such as promoting ethical business practices and preventing and detecting corruption and bribery	Risk	Medium term	Upstream, own operation
G1 - Governance	Entity specific (cyber security)	Disruption of operations due to a cyber-attack	Risk	Short, medium and long term	Own operation
G1 - Governance	Supply security	Interruptions in energy transmission and supply reliability	Risk	Short, medium and long term	Own operation

IRO-1 The process to identify and assess material impacts, risks and opportunities

Gasum undertook its first comprehensive double materiality assessment in alignment with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) in 2023–2025. The objective of this assessment was to identify the sustainability topics most relevant to the company, both in terms of the significant impacts Gasum has on people and the environment (impact materiality), and the sustainability-related factors that may influence its financial performance (financial materiality).

Process description

Gasum's double materiality assessment focused on activities and relationships that may pose significant impacts, risks or opportunities. These include energy production and sourcing operations as well as feedstock and fuel supply chains. Consideration was also given to direct and indirect involvement in impacts through the value chain, such as climate and circular economy impacts and risks linked to customer-related emissions and to feedstock.

Value chain mapping

During the process Gasum's value chain, core business activities, and geographic footprint were reviewed. This helped build a clear understanding of where the company might cause or contribute to impacts or where it depends on environmental or social systems that could pose risks or opportunities. As part of this step, Gasum also mapped its key stakeholders and collected insights through targeted interviews, particularly with customers, suppliers and financial market participants.

Impact assessment

Each identified impact was evaluated based on its scale and scope, and in the case of negative impacts, its remediability using a five-point scale where a score of five indicated a significant issue in each category. The likelihood of each potential impact was also assessed.

To ensure accuracy and consistency, internal experts reviewed the results to avoid overestimating or underestimating any issues. Topics were categorized according to ESRS standards and grouped under relevant sustainability themes such as climate change, circular economy, workforce, value chain workers, and business ethics. Throughout the process, both short- and medium-term timeframes were considered.

Financial assessment

Gasum assessed sustainability-related risks and opportunities using a structured methodology aligned with the company's enterprise risk management (ERM) framework considering both internal risk records and external drivers such as changes in regulation, climate-related risks, and supply chain dynamics.

Each identified item was evaluated using a five-point scale where a score of five indicated a significant issue in each category and was based on:

- Likelihood: The estimated probability of the risk or opportunity occurring within a defined time horizon, informed by historical data, and expert judgment.
- Magnitude: The potential financial and non-financial consequences for Gasum, including impacts on operations, regulatory compliance, reputation, and long-term value creation.
- Nature of the effect: Whether the impact is direct or indirect and short- or long-term.

The evaluation also included insights from the organization's Enterprise Risk Management (ERM) framework, highlighting transition risks associated with evolving regulations. Political decisions related to the climate transition may affect renewable energy, financial costs, and investment opportunities. The results of the double materiality assessment were consolidated at Group level.

To assess financial materiality, the identified impacts and dependencies were analyzed to determine whether they could translate into risks or opportunities for Gasum. This approach ensured that risks and opportunities were considered in the context of their environmental and social origins, allowing Gasum to prioritize actions that benefit both the company and society.

The assessment also highlighted how sustainability impacts and dependencies can create risks or opportunities. For example, investing in renewable gas provides climate benefits and positive supply chain impacts, while CO_2 emissions can pose both climate and operational risks.

Threshold

Gasum used a defined scoring system to determine materiality. Topics that received a score of nine or higher in either the impact or financial analysis were classified as material and included in the sustainability statement. In addition to the quantitative scoring, a qualitative review was carried out to ensure strategic alignment and completeness.

Outcome

The final results were consolidated at Group level and reviewed by the Group Management Team and the Audit and Risk Committee, before being formally approved by the Board of Directors. The overall process was also externally validated by an independent assurance provider.

The methodology used in the assessment is consistent with Gasum's broader risk management approach, even though the materiality process is not yet fully integrated into the enterprise risk management system.

At present, the materiality assessment and the Group's strategy update are not conducted simultaneously. However, insights from the assessment can be used for strategy development as well as sustainability work. The next scheduled update of the double materiality assessment will take place in 2026, with annual reviews continuing as part of Gasum's sustainability management cycle.

Data and topical parameters

The assessment drew on a wide range of information sources, including site-specific environmental data, internal impact reviews, and recognized human rights standards. Where direct data was not available, especially deeper in the value chain, the company used industry benchmarks and expert judgement.

In addition to general double materiality assessment the process included a topical approach to identify and assess impacts, risks and opportunities for each material topic.

Climate change

Climate-related impacts, risks, and opportunities were examined across the entire value chain – from Gasum's own operations to upstream suppliers and downstream customers. The analysis considered both the distribution of current greenhouse gas emissions and a range of climate-related risks, including transition risks associated with regulatory changes and market dynamics, as well as physical risks stemming from changes in climate patterns.

A resilience assessment was conducted using three climate scenarios, each reflecting a different level of global warming, to evaluate the robustness of key assets and operations under varied future conditions. Further details of the assumptions and methodology are provided in section ESRS E1 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business mode.

Resource use and circularity

The circularity of resource use was assessed through an analysis of material flows in Gasum's biogas operations, including inflows and outflows related to suppliers and end users. The analysis was complemented by expert insights to ensure a comprehensive understanding of key dependencies and opportunities related to more efficient and sustainable resource use.

Own workforce

The assessment included all Gasum employees and considered working conditions at every location. Information was gathered from internal sources, such as employee Pulse surveys and whistleblower reports when relevant. The analysis also took into account local and country-specific factors to ensure regional differences were properly reflected.

Workers in the value chain

Gasum assessed risks and opportunities for value chain workers by focusing on conditions in its upstream supply chains, especially among Tier 1 suppliers, where reliable data was accessible. The evaluation used the best available information and internal experts familiar with Gasum's procurement practices and supplier landscape. Despite incomplete data from all supplier tiers, this approach enabled focused analysis of major human rights and labor risks in the supply chain.

Business conduct

Business conduct risks were analyzed across all countries where Gasum operates, with emphasis placed on the company's own operations. Past cases of misconduct and supplier relationship management practices were reviewed to identify governance and ethical risks. The analysis assumed that strong supplier evaluation and transparency are key to minimizing conduct-related risks. Internal records, current knowledge of supplier practices, and expert insights were used to form a comprehensive view of the company's exposure.

IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

The disclosure requirements from the ESRS standards are presented in appendix 2. Each requirement is assessed for its materiality to Gasum based on the impacts, risks, and opportunities identified through the company's double materiality assessment. The methodology, including the

thresholds applied in the assessment, is described in section ESRS 2 IRO-1.

Based on the results of the double materiality assessment, topics such as pollution, water and marine resources and biodiversity and ecosystems were not identified as among the most material sustainability matters for Gasum at this time. However, environmental impacts remain an important focus in the company's overall risk management approach. Likewise, social topics related to consumers and end-users were assessed as not material for Gasum.

Gasum monitors and manages its environmental impacts through an ISO 14001-certified environmental management system. This system provides a common framework across all operations, guiding each unit in identifying, assessing, and mitigating any environmental risks that may arise from their activities, products, or services, including their potential life-cycle impacts. The effectiveness of this system is supported by regular internal and external audits, which ensure that risks are systematically identified and managed.

While Gasum has not organized separate consultation processes specifically with affected communities on these environmental topics, the company works actively with relevant stakeholders, particularly local authorities, through environmental permit processes. These interactions help detect and manage key environmental risks, impacts, or opportunities related to operations.

Environmental information

EU Taxonomy

The European Union target is to achieve climate neutrality by 2050. To support emission reductions and mobilize private sector investment in the green transition, the EU has established the EU Taxonomy, a classification framework for environmentally sustainable economic activities.

Taxonomy reporting

Taxonomy reporting includes six key environmental objectives:

- Climate change mitigation
- Climate change adaptation
- Water resources and marine resources
- Circular economy
- Pollution prevention
- Biodiversity and ecosystems

Eligible activities are primarily assessed based on the environmental objectives they promote. It is also ensured that these activities do not cause significant harm to other environmental objectives (DNSH). For activities identified in the taxonomy, the shares of turnover, capital investments, and operating expenses are presented.

When reporting taxonomy alignment, the extent to which business activities contribute to achieving environmental objectives is assessed. An activity is considered taxonomy-aligned if it significantly advances a defined environmental objective (significant contribution) without causing substantial harm to other objectives (DNSH). Additionally, the activity must meet minimum safeguard requirements

Analysis of alignment and eligibility economic activities

The alignment assessment was carried out using detailed, activity-specific criteria based on both regulatory requirements and practical implementation at the plant level. It was also evaluated whether individual activities caused significant harm to any other environmental objective defined in the EU taxonomy. This DNSH assessment was also performed at the plant level, utilizing both regulatory benchmarks and activity-specific evidence.

Gasum has conducted eligibility and alignment assessments in accordance with the EU taxonomy regulation, the climate-related delegated regulation, and the available guidance from the European Commission. Each economic activity has been assessed separately using the significant contribution and no significant harm criteria by Gasum's experts in various fields. Minimum social safeguards have been assessed at the group level. Gasum also utilized external experts in its assessment process.

In 2025, Gasum identified two taxonomy-eligible activities (CCM 5.6 and CCM 5.7), both of which were also taxonomy-aligned. Both activities aim for significant progress in climate change mitigation and meet the technical screening criteria set for the activities

Do no significant harm (DNSH) requirements

Climate change adaptation

Climate-related physical risks are assessed as part of Gasum's enterprise risk management. Scenario-based analysis shows no material physical climate risks for biogas plants or gas infrastructure, and adaptation measures are embedded in operating procedures and business continuity planning.

Water resources

Water use is limited and mainly linked to biogas processes. Gasum sources water mainly from municipal networks, and wastewater is discharged to municipal treatment facilities in compliance with local regulations. Biogas sites comply with environmental permit requirements governing water use, monitoring and wastewater discharge. Based on water-risk screening, overall impact on water resources is low.

Pollution prevention and control

Operations comply with environmental permit limits and ISO 14001 processes covering emissions, chemical handling, waste management and monitoring. Hazardous substances are minimized and replaced where technically feasible.

Circular economy

Gasum's biogas production inherently supports circularity through the use of organic waste and the return of digestate as recycled fertilizer. Resource efficiency, waste minimization and recycling are embedded in ISO 14001 practices.

Biodiversity

Environmental permitting includes biodiversity protection requirements. Screening confirms that Gasum's sites are not located within or near sensitive biodiversity areas (e.g., Natura 2000). Permit-based mitigation measures are implemented where required.

Minimum safeguard

Gasum considers itself to comply with the taxonomy's minimum social safeguards, which cover human rights, anti-corruption and bribery, fair competition, and taxation.

Gasum conducted a human rights impact assessment in 2025. More information about this assessment can be found on G1-1 Business conduct policies and corporate culture. The assessment process is discussed in more detail in section G – Business conduct. The company's Code of Conduct, supplemented by a separate anti-corruption policy (antibribery and corruption), includes anti-corruption and fair competition. Issues related to corruption and bribery are addressed in the sustainability report section G1, and information on taxation can be found in the notes to the financial statements under Taxation. Gasum's climate risks are described in more detail in section SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model of the report.

Reporting principles

Gasum's turnover figures have been calculated in accordance with IFRS standards, as stated in the consolidated financial statements. The total turnover used in the calculation corresponds to the consolidated turnover. The principles for calculating turnover are described in Accounting principles note 2.1 in Gasum's Financial Statement 2025.

Capital expenditure includes additions to intangible and tangible assets, including additions to right-of-use assets recorded under long-term leases. Additions to goodwill from business acquisitions are not included in the capital expenditure defined in the taxonomy. These items have been treated in accordance with IAS 38 Intangible Assets, IAS 16 Property, Plant and Equipment, and IFRS 16 Leases standards. Additions to intangible assets are presented in note 3.1 and additions to tangible assets in note 3.2 in Gasum's Financial Statement 2025. Operating expenses include research and development costs recorded as expenses, as well as maintenance costs for production plants and properties, supplemented by waste management and short-term lease costs. In the group's income statement, the operating expenses defined in the taxonomy regulation are included in materials and services as well as other operating expenses. Operating expenses are presented in notes 2.3 Materials and Services and 2.6 Other operating expenses in Gasum's Financial Statement 2025.

The indicator for turnover, capital expenditures, and operating expenses includes items related to assets or processes defined in the taxonomy activities. To prevent double counting, external turnover has been classified into taxonomy activities only once. Capital expenditures and operating expenses have been clearly separated for each activity.

Gasum's Taxonomy-eligible and Taxonomy-aligned economic activities in 2025

CCM 5.6 Anaerobic digestion of sewage sludge

This activity includes the treatment of sewage sludge by anaerobic digestion, resulting in biogas as the end product. Gasum's Finnish plants in Huittinen, Riihimäki, Oulu, and Turku have been identified as belonging to this activity. Turnover from these plants consists of direct sales of waste management services, fertilizer sales, raw biogas and compressed biogas sales, and sales of transport fuel.

The CAPEX figures for the activity consist of investments made in the plants. OPEX figures mainly consist of annual maintenance operations at the plants.

This activity is eligible, as it is explicitly included in the EU taxonomy framework for climate change mitigation. It is also aligned with the EU Taxonomy's technical screening criteria. All relevant plants meet the requirements for GHG-emission reductions and process performance as defined under the Technical Screening criteria for CCM 5.6. In addition, the activity fully meets the Do Not Significant Harm (DNSH) criteria across all environmental objectives, including water and marine resources, pollution prevention, circular economy and biodiversity. Minimum Safeguards requirements are fulfilled.

Proportion of Taxonomy eligible and aligned turnover is 2.64% in fiscal year 2025.

CCM 5.7 Anaerobic digestion of biowaste

This activity includes the treatment of biowaste by anaerobic digestion, resulting in biogas as the end product. Gasum's other Finnish plants (not mentioned in activity 5.6), as well as plants in Sweden and Denmark, have been identified as belonging to this activity. Turnover from these plants consists of direct sales of waste management services, fertilizer sales, raw biogas and compressed biogas sales, and sales of transport fuel.

The CAPEX figures for the activity consist of investments made in the plants. OPEX figures mainly consist of annual maintenance operations at the plants

The activity is eligible, as it is listed in the EU Taxonomy for climate change mitigation purposes. Majority of the plants in

this activity are fully aligned with the EU Taxonomy. They meet all Technical Screening Criteria (TSC) related to process efficiency, treatment requirements, and GHG reduction performance. They also comply with all DNSH requirements for water and marine resources, pollution control, circular economy, and biodiversity. Minimum Safeguards criteria are fulfilled. Two plants that do not currently meet all Technical Screening Criteria. Specifically, these plants do not fully comply with the TSC thresholds and DNSH criteria for water and marine resources, which prevents full alignment. Other DNSH criteria and Minimum Safeguards requirements are met.

Gasum is monitoring these two plants and developing improvement measures to support future alignment.

Proportion of Taxonomy eligible revenue is 6.91% and aligned turnover is 6.10% in fiscal year 2025.

Proportion of turnover, CapEx, OpEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering year 2025 (summary KPIs)

Financial year 2025

					Breakdown by environmental objectives of Taxonomy aligned										
KPI (1)	Total (2)	Propotion of Taxonomy eligible activities (3)	Taxonomy aligned activities (4)	Proportion of Taxonomy aligned activities (5)	Climate Change Mitigation (6)	Climate Change Adaptation (7)	Water (8)	Circular Economy (9)	Pollution (10)	Biodiversity (11)	Proportion of enabling activities (12)	Proportion of transitional activities (13)	Not assessed activities considered non-material (14)	Taxonomy aligned activities in 2024 (15)*	Proportion of Taxonomy aligned activities in 2024 (16)*
Text	EUR	%	EUR	%	%	%	%	%	%	%	%	%	%	EUR	%
Turnover	1,248,122,169.70	9.55%	109,117,662.77	8.74%	8.74%	0.00%					0.00%	0.00%	0.00%		
CapEx	119,699,162.00	42.80%	51,021,945.89	42.63%	42.63%	0.00%					0.00%	0.00%	0.00%		
OpEx	33,800,192.71	36.72%	11,612,883.56	34.36%	34.36%	0.00%					0.00%	0.00%	0.00%		

*EU Taxonomy reporting has been prepared for the first time for the financial year 2025; consequently, no comparative information for the prior period is presented.

Proportion of turnover from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering year 2025 (activity breakdown)

Reported KPI (Turnover)

Financial year 2025

					Environmental objective of Taxonomy aligned activities								
Economic Activities (1)	Code (2)	Taxonomy eligible KPI (Proportion of Taxonomy eligible Turnover) (3)	Taxonomy aligned KPI (monetary value of Turnover) (4)	Taxonomy aligned KPI (Proportion of Taxonomy aligned Turnover) (5)	Climate Change Mitigation (6)	Climate Change Adaptation (7)	Water (8)	Circular Economy (9)	Pollution (10)	Biodiversity (11)	Enabling activity (12)	Transitional activity (13)	Proportion of Taxonomy aligned in Taxonomy eligible (14)
Text		%	EUR	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
Anaerobic digestion of sewage sludge	CCM 5.6	2.64%	32,919,983.98	2.64%	2.64%	0.00%							100.00%
Anaerobic digestion of bio-waste	CCM 5.7	6.91%	76,197,678.79	6.10%	6.10%	0.00%							88.28%
Sum of alignment per objective					8.74%	0.00%							
Total KPI (Turnover)		9.55%	109,117,662.77	8.74%	8.74%	0.00%					0.00%	0.00%	91.52%

Proportion of CapEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering year 2025 (activity breakdown)

Reported KPI (CapEx)

Financial year 2025

					Environmental objective of Taxonomy aligned activities								
Economic Activities (1)	Code (2)	Taxonomy eligible KPI (Proportion of Taxonomy eligible CapEx) (3)	Taxonomy aligned KPI (monetary value of CapEx) (4)	Taxonomy aligned KPI (Proportion of Taxonomy aligned CapEx) (5)	Climate Change Mitigation (6)	Climate Change Adaptation (7)	Water (8)	Circular Economy (9)	Pollution (10)	Biodiversity (11)	Enabling activity (12)	Transitional activity (13)	Proportion of Taxonomy aligned in Taxonomy eligible (14)
Text		%	EUR	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
Anaerobic digestion of sewage sludge	CCM 5.6	8.07%	9,664,042.87	8.07%	8.07%	0.00%							100.00%
Anaerobic digestion of bio-waste	CCM 5.7	34.73%	41,357,903.02	34.55%	34.55%	0.00%							99.49%
Sum of alignment per objective					42.63%	0.00%							
Total KPI (CapEx)		42.80%	51,021,945.89	42.63%	42.63%	0.00%					0.00%	0.00%	99.58%

Proportion of OpEx from products or services associated with Taxonomy-eligible or Taxonomy-aligned economic activities – disclosure covering year 2025 (activity breakdown)

Reported KPI (OpEx)

Financial year 2025

					Environmental objective of Taxonomy aligned activities								
Economic Activities (1)	Code (2)	Taxonomy eligible KPI (Proportion of Taxonomy eligible OpEx) (3)	Taxonomy aligned KPI (monetary value of OpEx) (4)	Taxonomy aligned KPI (Proportion of Taxonomy aligned OpEx) (5)	Climate Change Mitigation (6)	Climate Change Adaptation (7)	Water (8)	Circular Economy (9)	Pollution (10)	Biodiversity (11)	Enabling activity (12)	Transitional activity (13)	Proportion of Taxonomy aligned in Taxonomy eligible (14)
Text		%	EUR	%	%	%	%	%	%	%	(E where applicable)	(T where applicable)	%
Anaerobic digestion of sewage sludge	CCM 5.6	9.29%	3,140,337.22	9.29%	9.29%	0.00%							100.00%
Anaerobic digestion of bio-waste	CCM 5.7	27.43%	8,472,546.34	25.07%	25.07%	0.00%							91.40%
Sum of alignment per objective					34.36%	0.00%							
Total KPI (OpEx)		36.72%	11,612,883.56	34.36%	34.36%	0.00%					0.00%	0.00%	93.57%

E1 Climate change

E1-1 Transition plan for climate change mitigation

Currently the majority of Gasum Group's revenue comes from the sales of natural gas. However, Gasum's strategic ambition is to be a partner to its customers in the energy transition. This means the provision of renewable energy solutions and services, through which Gasum supports the decarbonization efforts of its customers and actively contributes to the broader transition toward a low-carbon economy. In 2025, Gasum enabled its customers to reduce their greenhouse gas emissions by a total of 759 000 tCO_2eq (696,000 CO_2eq in 2024) through the use of biogas compared with fossil fuels. The emission reduction is calculated with the methodology defined in Renewable Energy Directive, comparing the emissions from biogas value chain with the fossil reference factors.

Strategically, Gasum is transitioning its business model towards renewable energy and circular economy solutions. This means a gradual shift in the proportion of revenue coming from natural gas and liquefied natural gas towards revenue from renewable energy and services. Gasum aims to maintain a balanced energy portfolio that supports short-term operational and financial stability while enabling long-term decarbonization and growth. The company's strategy combines the continued operation of existing gas infrastructure with a progressive shift toward renewable fuels including the substitution of fossil gas with biogas, thereby contributing to a reduction in overall emissions. To ensure the long-term viability of this strategy, Gasum conducts regular risk/resilience assessment of its portfolio against both transition risks and the physical impacts of climate change.

Gasum's transition plan is anchored in the following pillars:

- Accelerated investments in biogas: Gasum is expanding its biogas production capacity through new plant investments and strategic partnerships.
- Shift from fossils to renewable gases: Gasum is systematically reducing its reliance on fossil LNG and CNG, following a clear trajectory to increase the relative share of renewable gases in its portfolio.
- Use of renewable energy in operations: Gasum is aiming for using 100% renewable energy in its own operations by 2034 as well as to systematically seek ways to improve energy efficiency. Customers are supported in their transition to renewable energy through product offerings and partnerships.
- Robust governance and integration: The transition plan is formally approved by the Board of Directors, with climate performance integrated into executive incentives and operational key performance indicators. Climate risk assessments are embedded within Gasum's risk management framework

Financially, the transition is supported by Gasum's Green Finance Framework. In 2024, Gasum extended its green loan from EUR 152 million to EUR 175 million, financing strategic investments in biogas production across 20 locations in Finland and Sweden. These include new large-scale plants in Götene and Borlänge, and expansion projects at existing sites such as Oulu, Vehmaa, Riihimäki, Turku, and Örebro. The combined biogas production increase from these projects is estimated at 80 GWh per year. This represents approximately 9% of the company's current annual own production capacity of around 910 GWh. No significant CapEx investments were made in coal, oil, or fossil gas activities during the reporting period.

Gasum does not have a separate target to increase the share of EU Taxonomy-aligned activities; however, future plant investments are expected to influence this share over time. The alignment of operating expenses and capital expenditure to the EU Taxonomy climate change mitigation (CCM) objective is disclosed on page 27. Gasum is excluded from the EU Paris-aligned Benchmarks, as the company derives revenue from the distribution of gaseous fuels.

To support this transition, Gasum has set a long-term ambition to achieve net zero emissions across its full value chain by 2050 and has established interim targets for 2034. The company aims to reduce value chain CO_2 intensity (tCO_2eq/GWh) by 28% from a 2024 baseline and to cut absolute emissions from its own production by 25%. While the near-term trajectory reflects the current pace of energy system transformation, Gasum's strategic direction, investments and evolving business model are designed to ensure full long-term alignment with the Paris Agreement.

Gasum recognizes the potential risk of locked-in greenhouse gas emissions associated with existing LNG assets, which is taken into account in its climate transition planning. These assets may give rise to transition risks, particularly in the context of accelerating regulatory, market and technological changes. Gasum seeks to mitigate such risks through a gradual phase-down of fossil gas, the transformation of energy systems toward renewable solutions, and investments in biogas production. Gasum's resilience is supported by geographically diversified

infrastructure, established biogas capabilities, and the ability to repurpose LNG assets.

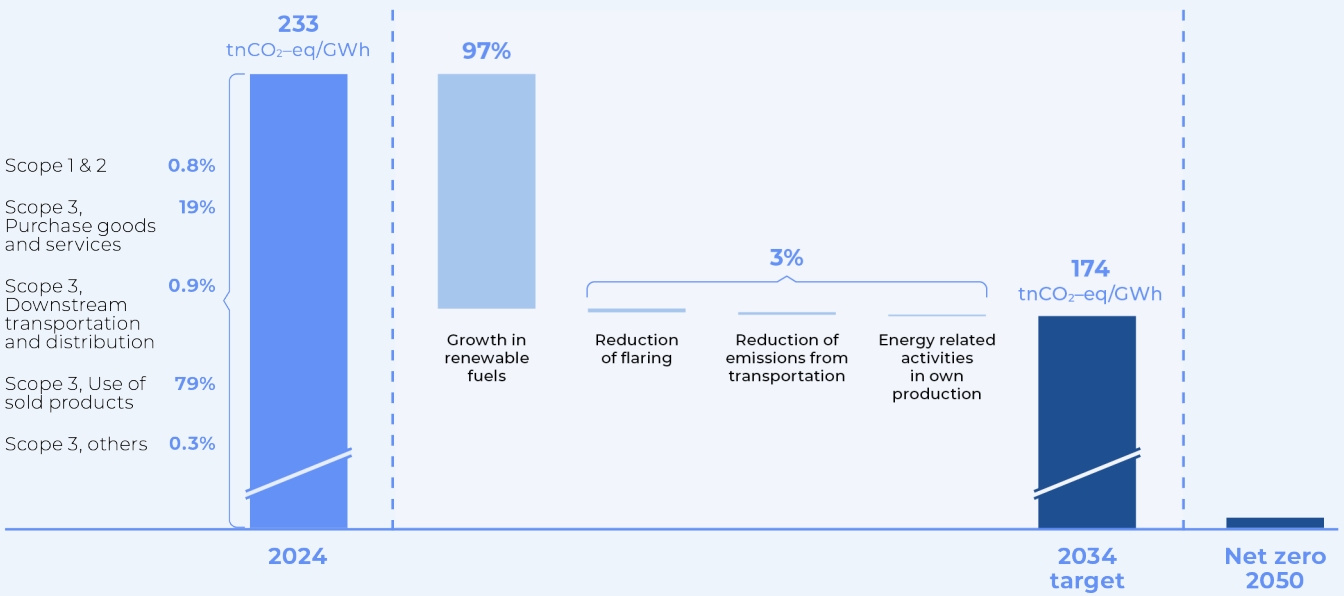
Transition risk is evaluated through scenario analysis, including alignment with net zero, a 1.5 °C pathway, a well-below 2 °C trajectory, and internal moderate and high-risk cases. Across these scenarios, renewable fuels continue to play a critical role in decarbonization. Gasum's Code of Conduct aligns public policy engagement with climate ambition. The company monitors and influences regulatory developments and participates in climate-related policy dialogues. Advocacy is guided by sustainability commitments and Paris-aligned principles.

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

Gasum's climate risk and resilience analysis outlines climate-related risks and opportunities and their implications for Gasum's strategy and business model. The analysis was conducted by applying the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. It forms a core component of the company's climate transition planning and supports the alignment of strategic ambition with long-term resilience.

Physical risks include acute events such as storms, floods, and extreme temperatures, as well as chronic changes in climate patterns, including sea-level rise and long-term shifts in feedstock availability. These risks may affect infrastructure, logistics, and sourcing operations across Gasum's value chain.

Emissions breakdown



External factors influencing the transition plan

The successful execution of Gasum's climate transition plan depends on a stable and predictable regulatory and market environment that drive demand for renewable fuels.

Public funding frameworks, investment and operating subsidies, and the timely development of Nordic energy infrastructure are critical to scaling renewable solutions.

Cross-sector partnerships remain essential to accelerate market development and enable a cost-efficient, system-wide transition.

Transition risks are associated with regulatory developments, market dynamics, technological shifts, and reputational factors. These include tightening EU climate regulations, stricter methane emission limits, and evolving stakeholder expectations for low-carbon energy solutions.

The resilience of Gasum's strategy and business model was assessed through scenario analysis, covering both physical and transition dimensions. Physical climate risks have been assessed across upstream sourcing, operational infrastructure, and downstream distribution. Acute risks include extreme weather events such as storms, floods, and heatwaves, which may disrupt infrastructure and logistics. Chronic risks include long-term changes in temperature and precipitation patterns, sea-level rise, and permafrost thawing, which may impact port operations and feedstock sourcing.

The analysis applied two climate scenarios – SSP1-2.6 and SSP5-8.5 – representing low and high emissions pathways respectively. SSP1-2.6 reflects a sustainable development trajectory with ambitious global climate action, limiting warming to well below 2°C. SSP5-8.5 represents a fossil fuel-intensive future with minimal mitigation, where global warming exceeds 4°C by 2100. These scenarios were used to assess exposure of assets and activities over the long-term horizon (2040–2060). Gasum recognizes that extreme weather events are expected to occur more often in the future; however, current assessments indicate that these events are unlikely to cause significant disruption to the company's asset operations in the short or medium term.

For transition risks, the IEA Net Zero 2050 (NZE250) and Stated Policies scenarios (STEPS) were used to evaluate exposure under accelerated and delayed policy environments.

- NZE2050 reflects a rapid and coordinated global transition aligned with the Paris Agreement's 1.5°C target, characterized by strong climate policy, electrification, and declining fossil fuel demand.
- STEPS represents a future where governments implement only the climate and energy policies formally adopted or announced as of the reporting year, resulting in slower progress and higher residual emissions.

These scenarios were used to evaluate regulatory, market, technological, and reputational risks and opportunities across the short (2025–2030), medium (2030–2040), and long-term (2040–2060) horizons.

Regulatory risks and opportunities include tightening EU climate legislation, such as the expansion of the Emissions Trading System, RED III, and FuelEU Maritime, which also supports demand for low-carbon solutions alongside stricter methane emission limits and sustainability criteria. Market risks relate to the shift toward electrification and alternative fuels, which may reduce demand for fossil LNG/CNG in transport and industry, while creating opportunities for renewable and low-emission gases. Technological risks concern the pace of development and deployment of new technologies and fuels. Reputational risks stem from stakeholder pressure for rapid decarbonization and the potential perception of being locked into a fossil-based infrastructure. Opportunities include growing demand for renewable gases, and circular economy solutions.

To assess resilience, Gasum conducted a structured analysis in 2025. Scenario analysis was used to evaluate strategic resilience under five climate pathways: 1.5°C, well-below 2°C, current forecast, moderate risk, and high risk. The analysis covered emission sources, risk enablers, and mitigation measures. The scenario analysis outcomes suggest that Gasum is able to adapt its strategic approach to address the impacts of climate change. The company's diversified infrastructure, established biogas capabilities, and ability to repurpose LNG assets support its resilience and enable a credible transition pathway.

The resilience analysis confirms that Gasum is well-positioned to manage climate-related risks and capitalize on emerging opportunities, while continuing to deliver low-carbon energy solutions to its customers.

E1-2 Policies related to climate change mitigation and adaptation

Gasum's climate policy is embedded in its Code of Conduct and is approved by the Board of Directors. The policy applies to the company's own operations and includes commitment to respecting the environment and combating climate change, aligned with the company's purpose of enabling cleaner energy. The responsibility for implementing the policy's guidelines is Gasum Management Team. The policy is publicly available and is aligned with internationally recognized standards, including the UN Global Compact. The policy was developed without formal consultation of external stakeholders.

Gasum's climate policy addresses material impacts and risks, including: the reductions of CO_2 and CH_4 emissions from Gasum's operations., shift toward renewable energy and Improvements of energy efficiency The company is committed

to achieving net zero emissions in its entire value chain by 2050. The company's approach includes:

- Mitigation: Increasing the availability of renewable energy, particularly biogas.
- Adaptation: Identifying and managing climate-related risks and opportunities, including regulatory changes and physical climate impacts.
- Energy efficiency: Continuous improvement in operational energy intensity and implementation of energy-saving actions across sites, including process optimization, equipment upgrades, and systematic monitoring of energy use.
- Renewable energy deployment: 100% of electricity used in operations is sourced from renewables.

Progress is tracked through measures such as renewable gas deployment, CO_2 reductions and energy efficiency improvements

In addition, Gasum's publicly available Business Partner Code of Conduct sets out binding expectations for all suppliers and other partners, which include encouraging them to take into account the climate effects of their activities and, where feasible, work towards lowering greenhouse gas emissions including the monitoring the use of renewable gas in transportation.

Gasum's climate measures are managed through Gasum's ISO 14001-certified environmental management system, which covers 100% of operations. In addition, the company has an ISO 50001:2018 energy management system, which covers Gasum's supply, production, and delivery of gas products, as well as the processing of biodegradable waste, production of recycled nutrient and fertilizer products, and energy and portfolio management services.

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

Gasum's actions to advance climate transformation are guided by four key decarbonization levers: investments in biogas production, the decarbonization of its own operations, and the increased use of renewable energy across the value chain as well as continuous improvements in energy efficiency.

All actions apply to Gasum's own operations. Where relevant, they also take into account interfaces with upstream and downstream value-chain activities that are directly influenced by operational decisions. These measures are planned and implemented within short-term and minimum-term time horizons.

Increasing the availability of renewable energy and decarbonization of own production

The Götene biogas plant, completed in 2024 and commercial operations started in 2025, represents a significant milestone in Gasum's renewable gas strategy. With an annual production capacity of 120 gigawatt hours (GWh) of liquefied biogas, it is among the largest of such facilities in Sweden.

A second large-scale plant is currently under construction in Borlänge and is scheduled to begin production early 2027. Both facilities form part of Gasum's strategic plan to build five major biogas plants in Sweden, using local waste and manure to produce liquefied biogas and fertilizers.

The average lifecycle emission reduction of Gasum's biogas was 95,7% in 2025, with some production sites achieving reductions beyond 100% when manure was used as feedstock. The calculation is based on the RED methodology which allows attributing a bonus of 45 gCO_2eq/MJ to manure for improved agricultural and manure management where animal manure is used as a substrate for the production of biogas and biomethane.

In 2025, flaring increased compared to the previous year, primarily due to temporary operational disruptions, lower customer offtake and market-related factors limiting gas optimization. Flaring is a controlled burning of excess gas in exceptional situations to prevent methane releases. Although this represents a negative environmental development, the causes are considered largely temporary and mitigation measures remain ongoing. Gasum's aim is to reduce flaring, with an estimated reduction potential of 5,100 tons of CO_2eq by 2030 relative to the 2024 level.

Increased use of renewable energy across the value chain

Within its value chain, Gasum made solid progress in 2025 in increasing the share of renewable fuels in both maritime transport and road transport for gas deliveries. Renewables accounted for 24% of total transport energy consumption during the year, with the share in road transportation exceeding 40%. Continued implementation of low-carbon logistics solutions is expected to deliver downstream emission reductions of approximately 19,900 tons by 2030 relative to the 2024 level.

Energy efficiency

Gasum's energy management system, certified under ISO 50001:2018, supports systematic planning, monitoring, and implementation of energy efficiency measures across its operations. In 2025, the company recorded 31 energy-saving actions across its biogas plants and LNG terminals, exceeding its target of at least one action per site. These included methane leakage detection, and several process optimizations.

In 2025, Gasum carried out several targeted investments e.g. including the installation of boiler cooling unit at the Riihimäki, after and hydrolysis gas storage renovations at the Vehmaa, Reliq system full maintenance at Pori terminal and Oulu biogas plant process change to get more feed though the hygienization process with the same amount of energy. All together these projects are expected to deliver annual energy savings of 10,000 MWh. These actions are part of a broader program to reduce emissions and improve operational performance through technical upgrades and process improvements. All Finnish energy actions are reported to Finnish Energy Efficiency Agreement. No emission reductions have been quantified for these actions, as the Energy Efficiency Agreement is designed to track energy savings rather than emissions

The company's energy efficiency efforts are aligned with the Finnish Energy Efficiency Agreement for Industries, under which Gasum has already exceeded its 2017–2025 target of 8 GWh in energy savings. Cumulative savings are calculated from all implemented energy efficiency measures, each based on an assessed saving potential. The target reflects a 1% annual energy-saving requirement set at the beginning of the agreement period. Progress toward the target is monitored through Gasum's sustainability KPIs, which are regularly reviewed by senior management.

Looking ahead, Gasum has committed to a new agreement period from 2026 to 2035, with a target of 6% energy savings by 2030, equivalent to 8,335 MWh, and a cumulative 10% savings by 2035, or 13,892 MWh. The measures primarily involve operational activities and do not require significant CapEx investment; consequently, no separate budget or resource allocation has been assigned. Implementation is managed within existing operational resources, and progress is monitored consistently with the company's overall emissions reduction objectives.

E1-4 Targets related to climate change mitigation and adaptation

Gasum's targets drive actions to reduce emissions, promote energy efficiency and increase the use of renewable energy both in the company's own operations and across its value chain.

Gasum has set a long-term ambition to achieve net zero emissions across its operations and value chain by 2050. As an interim milestone, the company aims to reduce CO_2 intensity of its entire value chain (measured in tons CO_2eq per GWh) by 28% by 2034, using 2024 as the baseline year (233 CO_2eq per GWh). The baseline year was selected to ensure consistency with Gasum's Scope 1–3 reporting, using the same organizational boundaries as in ongoing disclosures. Rather than setting an absolute emission target, Gasum uses this intensity-based approach, which reflects the nature of its operations where a large share of emissions comes from fossil gas and allows the company to pursue growth while managing emissions efficiency. While no separate CO_2-intensity target has been set for 2030, the company's decarbonization pathway would imply an intensity level of approximately 18 tCO_2eq per GWh by that year.

Achieving net zero emissions may require the use of carbon removals or offsetting to address residual emissions that remain after all reduction measures. The specific approach for such measures has not yet been defined, reflecting the long-term nature of Gasum's net zero targets.

In addition to the CO_2 intensity target, Gasum has set complementary targets for its own operations and downstream transportation. These include a 25% reduction in total absolute emissions from own operations (2024: 26,700 tCO_2eq) and a 60% reduction in downstream transportation absolute emissions (2024: 33,100 tCO_2eq) by 2034, using 2024 as the base year. Gasum has also signed the Finnish Energy Efficiency Agreement, committing to a 10% energy saving between 2026–2035, with a 6% interim target for 2030, and will implement measures to achieve these goals.

Emission calculations are based on the GHG Protocol methodology, except for those related to biogas production and sourcing, which follow the methodology defined in the EU Renewable Energy Directive (RED). Under RED, the greenhouse gas emission savings from biogas are calculated using a life-cycle approach that includes feedstock collection, transport, processing, and distribution. Gasum applies the RED default values and calculation rules to ensure consistency and comparability across its biogas portfolio.

While formal consultation was not conducted specifically at the time of target setting, stakeholder expectations have been

taken into account through ongoing dialogue and regular engagement. The targets are supported by a decarbonization roadmap that outlines key decarbonization levers. Gasum has considered future developments such as changes in sales volumes, shifts in customer demand, regulatory changes, and emerging technologies in setting its targets. These assumptions are reflected in the design of mitigation actions and the expected contribution of each decarbonization lever.

Gasum's climate targets were formally approved by the Board of Directors in September 2025 and are scheduled for integration into company operations starting in 2026.

E1-5 Energy consumption and mix

In 2025, Gasum's total energy consumption amounted to 347,230 GWh, marking a 42% increase compared to the previous year. The energy intensity of operations was 0,066 calculated as the ratio of energy consumed in the gas supply chain to the energy content of delivered products. The new Götene and Haerup biogas plants affected the increase of total energy consumption the most.

All electricity used in Gasum's own operations during 2025 was sourced from 100% renewable sources. This transition to renewable electricity was completed in 2018 and has since remained in place. A significant share of this electricity is used in biogas plants, supporting the company's renewable gas strategy.

In Gasum, heat energy is mainly used in biogas plants. Gasum's energy mix includes heat energy used in biogas production, which is generated from raw biogas, natural gas, and landfill gas. In addition, part of the process heat is purchased as district heat.

Energy consumption and mix	2025 (MWh)
(1) Fuel consumption from coal and coal products	0
(2) Fuel consumption from crude oil and petroleum products	1,280
(3) Fuel consumption from natural gas	86,880
(4) Fuel consumption from other fossil sources	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	30,350
(6) Total fossil energy consumption (MWh)	118,510
Share of fossil sources in total energy consumption (%)	34
(7) Consumption from nuclear sources (MWh)	0
Share of consumption from nuclear sources in total energy consumption (%)	0
(8) Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	116,610
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	112,110
(10) Consumption of self-generated non-fuel renewable energy (MWh)	0
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	228,720
Share of renewable sources in total energy consumption (%)	66
Total energy consumption (MWh)	347,230
Total energy consumption per net revenue from activities in high climate impact sectors, (MWh/MEUR)	0,0003
Total energy consumption from activities in other activities (MWh/MEUR)	0

Accounting principles: Energy consumption and mix

The energy figures related to own operations cover all facilities where Gasum has control or holds equal or more than a 50% ownership stake. Energy consumption refers to the use of fossil fuels in vehicles, vessels, and Combined Heat and Power (CHP) systems, as well as the use of heat purchased or acquired from fossil sources. All electricity Gasum uses in its operations is 100% covered by Guarantees of Origin (GO) of renewable energy regulated in the Renewable Energy Directive (RED).

Electricity and heat consumption of offices is calculated where it is not included in the rent and Gasum has a separate contract. Invoices form the basis of consumption data and emission calculations. Gasum does not utilize nuclear energy in its operations.

All Group operations fall under "high climate impact" activities. Therefore, the calculation of energy intensity is based on the Group's total energy consumption and consolidated revenue. The figures for 2024 have not been assured.

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

Gasum's total greenhouse gas (GHG) emissions in 2025 amounted to approximately 2,588,640 tons of CO_2 equivalent. The vast majority of these emissions (98 %) originated from the company's value chain (Scope 3), while direct operational emissions (Scope 1) and purchased energy emissions (Scope 2) represented a small fraction of the total.

Scope 1 emissions primarily stemmed from flaring at LNG terminals and methane leakages, such as those occurring in the gas refining process. Scope 2 emissions were related to purchased energy and electricity used in Gasum's operations. All electricity used in Gasum's operations was 100% renewable sourced from Nordic wind power with guarantees of origin.

Scope 3 emissions totalled 2,530,555.30 tons of CO_2eq, representing a decrease compared to the previous year. The reduction was primarily driven by lower volumes of natural gas in the value chain.

Gasum's biogenic emissions of CO_2 from the combustion or bio-degradation of biomass including in Scope 1 GHG emissions were 119,160 tCO_2eq and scope 2 GHG emissions were 1,500 tCO_2eq in 2025.

	Retrospective			Milestones and target years			
	Base year, 2024	N:2025	%N / N-1	2030	2034	2050	Annual % Target / base year
Scope 1 GHG Emissions							
Gross Scope 1 GHG emissions (tCO_2eq)	25,370	55,561	119	-15 %	-25 %	-90 %	2.5
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)		16.5					
Scope 2 GHG Emissions							
Gross location-based Scope 2 GHG emissions (tCO_2eq)	6,422	6,524	2	-			
Gross market-based Scope 2 GHG emissions (tCO_2eq)	1,315	2,523	92	-15 %	-25 %	-90 %	2.5
Significant scope 3 GHG emissions							
Total Gross indirect (Scope 3) GHG emissions (tCO_2eq)	3,861,174	2,530,555	-34	-		*-90 %	
1 Purchased goods and services	742,820	616,767					
3 Fuel and energy-related Activities (not included in Scope1 or Scope 2)	2,137	8,686	306				
4 Upstream transportation and distribution	5,096	8,862	74				
5 Waste generated in operations	5,450	9,534	75				
6 Business traveling	334	388	16				
7 Employee commuting	73	208	185				
9 Downstream transportation	33,123	90,140	172	-36 %	-60 %		6
11 Use of sold products	3,072,141	1,795,971	-42				
Total GHG emissions							
Total GHG emissions location based (tCO2eq)	3,893,000	2,592,641					
Total GHG emissions market based (tCO2eq)	3,888,000	2,588,640					

GHG intensity

GHG INTENSITY PER NET REVENUE	2025
Total GHG emissions (location-based) per net revenue (tCO_2eq/MEUR)	0.0021
Total GHG emissions (market-based) per net revenue (tCO_2eq/MEUR	0.0021

Accounting principles: Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)

The reporting of emissions and carbon footprint follows the same principles as the company's financial reporting to ensure consistency, comparability, and reliability. All facilities where Gasum has control or holds equal or more than a 50% ownership stake are fully included in the reporting.

Emissions are calculated by multiplying activity data with the relevant carbon emission factor. Most common sources for emission factors that are used are Ecoinvent database; National Statistics publications; UK Department for Environment, Food and Rural Affairs (DEFRA); FuelEU Maritime publication; the Global Logistics Emissions Council (GLEC) framework and Renewable Energy Directive (RED) default values on few occasions. Some carbon emission factors are provided directly by manufacturers.

All emissions are converted to CO_2 equivalents in accordance with the standards provided by the Greenhouse Gas (GHG) Protocol.

The calculation methodology was refined in 2025, and as a result, the figures are not fully comparable with those reported for 2024. The figures for 2024 have not been assured. No external body other than the appointed assurance provider has validated the company's CO_2 reporting.

Direct GHG emissions (scope 1)

Scope1 emissions are calculated by multiplying energy consumption by the relevant emission factors. Methane emissions are converted to CO_2 equivalent using the GHG Protocol conversion factors.

Indirect GHG emissions (scope 2)

Scope 2 indirect GHG emissions are calculated from purchased and consumed electricity, heat, steam and cooling. Indirect CO_2eq emissions from electricity and heat procurement are determined according to the location-based and market-based methods. The location-based method reflects the average emission intensity of grids on which energy consumption occurs. Scope 2 market-based method reflects emissions from electricity that the organization has purposefully chosen. Market-based emission factors are supplier-specific, local-grid emission factors. The Scope 2 market-based method includes trade instruments such as Guarantees of Origin for electricity.

Indirect GHG emissions (scope 3)

Scope 3 indirect emissions are disclosed in accordance with the GHG Protocol. Scope 3 emissions refer to other fossil CO_2eq emissions originating from both the upstream and downstream value chain of all production units and facilities.

C1 Purchased goods and services, the chosen method for emissions calculation is either based on consumed volume of substance or spend-based approach for financial activities. Consumption is multiplied by the relevant emission factor for CO_2eq emissions.

- Upstream fuels: Emissions are calculated by multiplying sold volumes (in MWh) by the relevant emission factor.
- Chemicals and water: Emissions are calculated based on mass and cubic meter consumption.

C3 Fuel- and energy-related activities not included in scope 1 or scope 2, the CO_2eq emissions are calculated by multiplying the actual fuel, natural gas, and electricity consumption by their respective emission factors. This includes the upstream emissions associated with fuels used directly by Gasum.

C4 Upstream transportation and distribution, the category covers biogas plants raw material (feedstock) transporting CO_2eq emissions feedstock haulage is based on actual distances and the weight of the materials transported.

C5 Waste generated in operations, where waste data of own operations is collected and emissions are calculated for each waste type and treatment method in CO_2eq by multiplying the collected waste amount by the respective emission factor.

C6 Business travel data is compiled from Travel Agency reports covering mileage travelled by plane and train, as well as employee mileage allowances for the use of personal vehicles. Hotel stays are calculated using a spend-based approach, while other travel-related data is based on the company's travel management system.

C7 Employee commuting data is collected from the annual survey conducted for all employees in every operative country. Distance-based method was chosen, where data from employees commuting patterns (e.g., distance travelled, and mode used for commuting) is applied to the appropriate carbon emission factor for the modes used. The data collected from the questionnaire is extrapolated to estimate outcomes at the national levels.

C9 Downstream transportation and distribution covers land logistics of trucks delivering gas products to filling stations and to industrial customers, and fertilizers transport from biogas plants to customers. Vehicle consumption data is provided by logistics operators. The scope also covers all maritime logistics conducted with Gasum's contracted LNG tankers. The consumption data of these vessels comes from vessel

operators. CO_2eq emissions are calculated by multiplying consumption by the appropriate carbon emission factor.

C11 Use of sold products calculates carbon emissions of sold fossil products. The section encompasses most of the carbon emissions produced on a corporate level. CO_2eq emissions are calculated by multiplying sold volumes by the appropriate carbon emission factor. Only physically delivered volumes are included in the emission calculation. Volumes whose ownership is transferred virtually, without physical delivery, are excluded from the calculation.

Following categories are left out of reporting thus they are considered immaterial to total emissions or irrelevant to the operations.

- C2 Capital goods
- C8 Upstream leased assets
- C10 Processing of sold products
- C12 End-of-life treatment of sold products
- C13 Downstream leased assets
- C14 Franchises
- C15 Investments

Biogenic CO_2 emissions

The reporting of biogenic CO_2 emissions covers the emissions from Gasum's own operations. The biogenic emissions are separated from Scope 1 GHG emissions. The emissions are calculated by multiplying the activity data by the relevant emission factors. Biogenic CO_2 emissions under Scope 2 are presented as a preliminary estimate, as high-quality and sufficiently granular data is currently not available across all relevant energy inputs. Biogenic CO_2 emissions under Scope 3 are excluded.

E5 – Resource use and circular economy

E5-1 Policies related to resource use and circular economy

Gasum's strategy is built on circular economy principles, with key activities including biogas production and nutrient recovery from biodegradable waste and industrial side streams. The company's environmental policy as outlined in its publicly available Code of Conduct, addresses the material impacts, risks, and opportunities related to

- the circular use of resources by promoting the utilization of biodegradable waste and industrial side streams as feedstocks. Gasum converts biodegradable waste and residual feedstocks into energy and recycled nutrients, supporting material circulation and reducing reliance on virgin natural resources, which contributes to the management of biodiversity-related risks
- minimizing waste generation in Gasum's own operations. The company integrates zero waste and circular economy thinking into its operations to promote sustainability.
- supporting opportunities linked to circular solutions such as nutrient recycling and renewable energy production.

In line with the EU waste hierarchy, Gasum prioritizes the use of waste streams in a way that maximizes their material and energy recovery value, ensuring that biodegradable waste and industrial side streams are directed towards reuse, recycling, and recovery before disposal is considered. The policy is approved by Gasum's Board of Directors.

The policy applies to Gasum's own operations and is implemented through an environmental management system certified under ISO 14001. As of 2025, 21 out of 24 of Gasum's operational units were certified under this standard. The achievement of the policy's objectives is monitored through the management system, including the tracking of material flows, operational controls, and regular internal and external audits, as well as management reviews.

Responsibility for policy implementation rests with the Gasum Management Team. In developing the policy, Gasum has applied a holistic approach aligned with international environmental standards, such as ISO 14001, rather than focusing on specific stakeholder interests.

E5-2 Actions and resources related to resource use and circular economy

Gasum's business approach focuses on the sustainable use of resources, mitigation of environmental impacts, and delivery of long-term value through the transformation of waste into renewable energy and recycled nutrients. Activities support the company's environmental policy and its targets to advance resource efficiency and foster sustainable growth, in line with both national and EU targets on waste reduction and resource optimization.

Activities cover Gasum's owned operations across the Nordic countries, upstream feedstock suppliers, and downstream sectors such as transport and agriculture. These activities are fully integrated into Gasum's core operations and are carried out as part of regular operational expenditure and capital investments, without separate budgets or financial allocations.

To support these efforts, Gasum invests in advanced biogas facilities, maintains dedicated teams for environmental management and feedstock sourcing, and engages in ongoing R&D collaborations to drive innovation in circular technologies.

In the following, key short- and medium-term actions and initiatives regarding resource use and circular economy are described.

Nutrient recovery

Biogas production is a core component of Gasum's circular economy model. In 2025, Gasum processed a total of 1,454,000 tons of biodegradable feedstocks—including wastewater sludge, industrial and agricultural side streams, manure, and biowaste—across operations in Finland, Sweden, and Denmark. These inputs supported the production of approximately 1,480,000 tons of recycled nutrients and fertilizers and renewable energy as outputs, all based on 100% recycled feedstock materials.

In the circular recovery of nutrients nitrogen is refined into ammonia water and reused as a process chemical in industrial processes. In 2025, production was extended from the Turku plant to the Riihimäki and Oulu biogas plants. In fully integrated operations like the Nymölla plant, no redundant material flows are generated; the treated organic effluent is reused internally or returned to the industrial or agricultural process.

During the reporting period, Gasum started a targeted initiative to mitigate plastic contamination in fertilizers derived from packaged municipal biowaste feedstock in biogas

production in Finland Plastic separation systems have been installed at the Honkajoki plant, with installation ongoing at the Oulu and Riihimäki plants. These actions will ensure that Gasum's recycled nutrient products continue to comply with tightening contaminant limits, with clear quality improvements already visible through reduced plastic impurities. Feasibility studies are currently underway at other Finnish facilities to support the deployment of similar separation technologies. In Sweden, the amount of packaged municipal biowaste used in the production process is very small.

Biogas production

Potential Nordic biogas production volumes are estimated to be around 20–40 TWh annually based on feedstock availability. Gasum aims to steadily increase the availability of biogas to its customers in the coming years.by developing both its own biogas production and sourcing from partners. In 2025, Gasum's own biogas production reached 910 TWh. Sales of biogas developed positively, and were 2.7 TWh in 2025 (2.1 TWh in 2024) . Robust procurement performance strengthens Gasum's position for future market development and supports the continued growth of renewable energy supply.

Biomethane is a 100% renewable fuel that enables substantial greenhouse gas emission reductions across its life cycle. In accordance with the EU Renewable Energy Directive (RED II, 2018/2001/EC), biogas can deliver average emission reductions of 70–90% compared to fossil-based fuels. When manure is used as a primary feedstock, lifecycle emission reductions can exceed 100% due to the avoidance of methane emissions from conventional manure handling.

In 2025, 100% of Gasum's biomethane production complied with the sustainability criteria set out in the EU RED II framework. The average greenhouse gas emission reduction achieved across Gasum's biogas portfolio was 95,7%.

Plant investments and technological development

The expansion of biogas production capacity is proceeding as planned. During 2025 Gasum inaugurated a new large biogas plant in Götene, Sweden and started construction on another in Borlänge, Sweden, where production is scheduled to begin in 2026. The Borlänge investment represents a capital commitment of over EUR 62 million. Additionally, in 2025, Gasum acquired full ownership of a biogas production and upgrading company located in Helsingborg, Sweden, further strengthening its position in the Nordic biogas market.

In addition to investing in new plants, Gasum is expanding and optimizing its existing facilities. The expansion of the Oulu biogas plant was successfully completed in 2025, featuring the addition of a third reactor, an ammonia water evaporator, a heat pump, and auxiliary systems. In 2025, Gasum completed an investment at the Riihimäki biogas plant to treat reject water, enabling the conversion of wastewater sludge and biodegradable waste into a high-quality recycled nitrogen product.

Feedstock management

Securing feedstock availability is critical to scaling up biogas production. Gasum actively explores new feedstock sources, including the expanded use of animal manure. For example, in 2025 the Götene biogas plant in Sweden used primarily manure, supporting regional circularity by returning the nutrients to farmlands in the form of biofertilizer. Feedstock flows are optimized between facilities to maximize efficiency and reduce emissions from transport and waste treatment.

E5-3 Targets related to resource use and circular economy

Currently, Gasum has not set specific targets relating to resource use and circular economy in accordance with ESRS requirements. Gasum has set measurable objectives to advance circular economy and reduce environmental impacts through biogas production. These are informed by internal assessments, market analyses, and recognized methodologies in renewable energy and circular economy practices. They prioritize promoting the use of recycled materials, and ensuring the responsible sourcing of renewable resources.

By 2027, Gasum aims to reduce greenhouse gas emissions from biogas production by an average of around 95% per unit compared with 2022 fossil-based levels, in line with the EU Renewable Energy Directive (RED). In 2025, the company achieved a 95,7% reduction, up from 88.9% in 2022. This figure reflects the difference in lifecycle greenhouse gas intensity between Gasum's biogas and an equivalent fossil fuel, taking into account emissions from feedstock, production, and processing. The objective is linked to the recycling of treated biowaste (including packaged municipal biowaste and industrial side streams) into energy and recycled nutrients. This indicator is also a requirement under Gasum's

sustainability-linked loan, and performance is monitored regularly by senior management.

While formal consultation with external stakeholders was not conducted, stakeholder and owner expectations have been reflected through ongoing dialogue.

Accounting principles

The targeted increase in biogas sales is calculated based on Gasum's own biogas production and sourcing from its partners. The figures are based on actual produced and sourced biogas amount in TWh.

The greenhouse gas emissions are calculated for each biogas plant according to the calculation rules set in RED II Annex VI. The emission reduction achieved with the biogas is calculated based on the fossil reference factors defined in the directive. The factor is determined by the end-use application, whether for traffic or heating purposes. Compliance with the EU sustainability criteria, including emission reduction, is verified with national certification schemes which cover all Gasum's biogas plants (except Haerup in Denmark). The schemes require third-party audits for the sustainability systems.

E5-4 Resource inflows

Gasum's operations rely primarily on biodegradable organic feedstocks for biogas and recycled nutrient production. Resource inflows are considered material due to their environmental relevance, role in circular value creation, and dependency on upstream value chain availability.

In 2025, Gasum processed approximately 1,454,000 tons of biodegradable feedstocks, which form the core biological material inputs to its biogas and nutrient production processes. These include wastewater sludge, industrial and agricultural side streams, manure, and biowaste. The inputs are measured directly at reception facilities. Feedstocks are used to produce Gasum's renewable energy (biogas and liquefied biogas), as well as side streams such as recycled fertilizers and nutrients.

100% of the biological raw materials used are sustainably sourced, in line with the cascading principle, which prioritizes nutrient recovery and material reuse before energy conversion or disposal. Feedstocks are locally sourced through partnerships with municipalities, water utilities, and industrial producers. At plants, all sourcing is verified through national and voluntary certification schemes, including ISCC certification where applicable. Feedstocks such as manure are prioritized at large-scale plants (e.g.in Götene, Sweden), due to their high emission reduction potential.

Secondary materials are a key component of Gasum's circular operations. From the processed feedstocks, approximately 1,480,000 tons of recycled nutrient products were recovered and refined in 2025. These are used in agriculture and industry as fertilizers and industrial chemicals. Reuse and recycling categories are tracked using a mass balance approach: to avoid double counting, nutrients and energy recovered from the same feedstock are reported in separate output categories.

Water is used in controlled volumes at Gasum's production plants for process stabilization, cleaning, and cooling. Where possible, treated process water is reused internally or returned to the source facility (e.g. at the Nymölla plant). Water use is not considered a material environmental impact but is managed through site-level permits and efficiency controls.

Methodologies and assumptions

All data related to inflow is based on direct measurements at the plant level, supplemented by supplier documentation and material declarations. The weights of incoming feedstock and outgoing fertilizers are recorded with the plant's scale system using calibrated scales. Recycled nutrient volumes are calculated using mass-balance methods based on digester yield coefficients and separation system efficiency.

E5-5 Resource outflows

In comparison, the company's own operations generate relatively low volumes of waste. Most of the waste generated in Gasum's operations is recovered or reused. The primary solid waste fractions include sand and packaging materials removed from incoming feedstock at biogas plants. Plastic and other non-biodegradable contaminants may enter the process through incorrectly sorted biowaste and packaged biowaste from retailers or households. These materials are removed using advanced mechanical separation technologies, with removal efficiency reaching up to 99%.

Gasum's recycled fertilizers consistently meet the legal thresholds for non-biodegradable content and are already compliant with the stricter limits coming into force in 2028. The company is actively improving digestate purification to further reduce residual foreign materials and enhance product quality. Waste fractions unsuitable for reuse are directed to appropriate

treatment, and hazardous or non-recyclable waste volumes remain minimal.

Accounting principles

The figures cover waste from all production units and joint operations (50% ownership), in line with the Financial Statements. Waste from all production units is handled by waste management companies who deliver annual reports on amounts of waste handled. All amounts are consolidated as dry tons based on measured weights and reported by each plant to the Group's environmental system. Office waste is excluded from these figures, as reliable data is not available; it is considered minimal compared with production waste. The table does not include waste data from Götene, as the plant reached full capacity at the end of 2025.

METRICS RELATED TO RESOURCE OUTFLOWS	2025
Total amount of waste generated, tons	**14,001**
Total amount of waste diverted from disposal, tons	**2,350**
Non-hazardous waste, tons	
Preparation for reuse, tons	50
Recycling, tons	1,560
Other recovery operations, tons	690
Hazardous waste (incl. radioactive), tons	
Preparation for reuse, tons	0
Recycling, tons	40
Other recovery operations, tons	10
Total amount of waste directed to disposal, tons	**11,651**
Non-hazardous waste, tons	
Incineration, tons	11,180
Landfill, tons	0
Other disposal operations, tons	360
Hazardous waste (incl. radioactive), tons	
Incineration, tons	90
Landfill, tons	1
Other disposal operations, tons	20
Total amount of non-recycled waste, tons	11,650
Percentage of non-recycled waste, %	83
Total amount of hazardous waste, tons	161
Total amount of radioactive waste, tons	0

Social information

S1 – Own Workforce

SBM-2 Interests and views of own workforce

Gasum's employees are central to the company's long-term success, especially as it operates in a highly technical and regulated energy sector. The company places a strong emphasis on occupational health and safety, as well as fair and equitable working conditions. Workforce perspectives are gathered through structured engagement, including safety dialogues, employee surveys, and joint working groups, and are integrated into human resources management processes, ensuring alignment between operational execution and the company's long-term vision of delivering cleaner energy solutions sustainably.

SBM-3 Material impacts, risks and opportunities

Gasum's actual and potential impacts, risks, and opportunities are closely linked to its business model and strategy. Operating in the technically complex and safety-sensitive energy sector, workforce considerations are central to delivering the company's strategic objectives. Gasum recognizes that employees at its production sites face an elevated risk of safety incidents.

Material positive impacts include stable employment, which supports well-being and performance, as well as comprehensive occupational health coverage and preventive measures that promote a safe and healthy work environment. At the same time, despite preventive measures and a zero-tolerance policy, the company acknowledges that inappropriate behavior, harassment, or discrimination could occur.

Gasum's ESRS S1 disclosure covers all individuals in its own workforce who could be materially impacted, including 380 directly employed persons. Contractor employees working at production sites are addressed separately in ESRS S2 disclosures. The company's material impacts are not driven by environmental transition plans, and no parts of Gasum's own operations have been identified as being at significant risk of forced or child labor.

S1-1 Policies related to own workforce

Gasum is committed to maintaining a safe, fair, and supportive work environment across all its operations. The company's publicly available Code of Conduct together with its Equality Plan, provide the foundation for managing material workforce impacts.

Code of Conduct

The Code of Conduct has a strong focus on equal treatment, discrimination, inappropriate behavior, working conditions, occupational safety, health and other critical aspects to ensure a safe and supportive work environment for all employees. The principles apply to all employees and individuals working on Gasum's behalf, with compliance reinforced through mandatory training and e-learning programs.

Gasum is committed to respecting internationally recognized human rights and labor standards, in line with the UN Guiding Principles on Business and Human Rights, OECD Guidelines, and ILO Core Conventions. Gasum's policies explicitly prohibit forced labor, child labor, discrimination, and harassment, with clear reporting and grievance mechanisms, including a confidential whistleblowing channel. Gasum fosters a culture where all employees feel safe to raise concerns and speak up.

The Group's approach to human rights is embedded in its operations and business relationships, supported by ongoing human rights due diligence to identify, assess, and remediate any adverse impacts. For Gasum's own workforce, salient human rights issues include the right to a safe workplace, fair employment conditions, and access to effective grievance mechanisms.

The Code of Conduct is approved by the Board of Directors. The Gasum Management Team oversees policy implementation, and line managers ensure their teams have access to the guidance and resources needed to comply with corporate policies and governance standards. Health and safety risks are systematically managed through Gasum's ISO 45001-certified occupational health and safety system, with all operational units certified in 2025.

Equality Plan

The Equality Plan defines how Gasum, as an employer, actively promotes equality, prevents and addresses discrimination, and advances diversity and inclusion across all levels of the organization. It explicitly safeguards against discrimination based on age, language, ethnic or national origin, nationality,

religion or belief, opinion, disability, health status, sexual orientation, gender identity, family relationships, trade union or political activity, or any other legally protected grounds.

Gasum regularly monitors and evaluates the effectiveness of its equality and inclusion measures in consultation with employee representatives and the management team, ensuring continuous improvement. The Equality Plan is accessible to all employees, and any updates are communicated throughout the organization.

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

Gasum maintains structured processes to engage its workforce and their representatives on actual and potential impacts. Engagement is conducted in line with national legislation, collective agreements, and internal frameworks, including the Working Hours Act and the Occupational Safety and Health Act. Employees contribute both directly and through representatives, such as shop stewards and occupational safety committees, ensuring that their perspectives inform decision-making.

Gasum assesses the effectiveness of its engagement through multiple initiatives. Regular engagement channels include yearly development discussions, quarterly Pulse Surveys covering wellbeing, equality, and motivation, and ongoing feedback through the Occupational Health and Safety Committee and internal network of HSEQ personnel. In addition a HSEQ reporting system is used for safety management. Insights from the system are analyzed and acted upon to support continuous improvement in safety, quality, and operational performance.

The CEO holds overall responsibility for workforce engagement, with operational oversight delegated to the management team, line managers, and relevant committees. Communication and engagement are supported through multiple channels, including face-to-face meetings, virtual Teams meetings, regular information sessions to all employees, anonymous reporting, and the Gasum Intranet, complemented by mandatory e-learnings through the Gasum Academy.

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

Gasum has established clear and accessible processes to enable its workforce to raise concerns, report potential misconduct, and seek remedy for any adverse impacts. The company operates an independent, third party–managed whistleblowing channel, available 24/7 in all company languages, accessible via Gasum's website and intranet. The channel allows for confidential and anonymous reporting by employees, contractors, value chain workers, and individuals or organizations acting on their behalf.

In addition to the whistleblowing channel, concerns may be raised with line managers, Human Resources, HSEQ representatives, occupational health providers, or directly with the Group Compliance Officer. If Gasum's actions cause or contribute to a material adverse impact, the Group Compliance Officer convenes a cross-functional team—including HSEQ, Human Resources, and the relevant business unit—to investigate, implement remediation measures, and assess their effectiveness.

Workplace safety concerns are addressed through a dedicated safety reporting tool, enabling the reporting of safety observations and incidents. All reported incidents are investigated, with findings shared throughout the internal network of HSEQ personnel and preventive measures implemented to prevent recurrence.

Gasum's annual development discussions, regular 1-2-1 discussions, Early Support Model and the Safety Representative organization provide further channels to identify, address, and prevent workplace issues. All employees have an opportunity to receive training and information on the use of these mechanisms. Policies are in place to protect all individuals, including workers' representatives, from retaliation when raising concerns.

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

Occupational safety

Gasum takes targeted actions to prevent and mitigate material negative impacts on its workforce, with a strong focus on occupational safety and security. During the year, a new safety

instruction platform called PELSU Rescue Plan was launched for sites in Finland, ensuring employees have immediate access to site-specific emergency and safety procedures. Gasum group level implementation is ongoing with the Rayvn crisis management tool, which helps to manage and coordinate emergency situations, alert and activate the emergency preparedness organization quickly and ensure all information is shared and correct.

Safety e-training was delivered as planned, achieving 84% workforce coverage. Physical security at certain biogas plants was enhanced with the installation of perimeter fencing, new access control system and surveillance cameras. Several emergency exercises were carried out in the locations where the company operates (biogas plants, terminals, filling stations, offices). Occupational work hygienic measurements have been done at all Finnish biogas plants.

Health and well-being

Employee engagement and well-being were supported through regular Pulse Surveys during the reporting year, with the results indicating a good overall satisfaction score of 8 on a scale of 1 to 10. Insights from these surveys are actively used to guide targeted improvement measures.

During 2025 Gasum continued its Job Architecture initiative, completing the grading of all roles across the organization. The aim is to provide a transparent and consistent framework for career progression, remuneration, and talent development, supporting both employee motivation and the company's strategic workforce planning.

In 2025, 95% of Gasum employees participated in development discussions, ensuring that individual goals, career aspirations, and learning needs were systematically addressed. In addition, employees completed an average of 10 hours of training during the year.

In 2025, Gasum updated its Equality Plan and participated in the UN Global Compact Nordic Programme on Non-Discrimination, assessing its practices and defining targeted improvement actions. As a result, the Group Management Team approved Diversity, Equity and Inclusion (DEI) principles, targets and an action plan for 2026–2027. In 2026, Gasum will roll out company-wide training to support the effective integration of DEI into daily operations and decision-making.

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

Gasum has set time-bound, outcome-oriented targets to ensure the safety, physical and psychological security, well-being, and professional development of its employees and contractors, as well as to foster a positive workplace culture. Targets are designed to reduce safety risks, enhance well-being and engagement, and secure long-term organizational performance.

Targets are defined through a review process led by senior leadership, HR, and HSEQ functions, informed by performance data, risk assessments, and benchmarking. Progress is reviewed annually, and lessons learned are applied to continuous improvement plans.

Occupational safety – "Zero Harm"

Gasum has defined the following targets regarding occupational safety with the baseline in 2023 figures:

- Lost-Time Injuries (LTI): Target of zero LTIs for both employees and contractors.
- Total Recordable Injury Frequency (TRIF): Reduce TRIF to 10 by 2027 (2023 baseline: 16.6).
- Safety Walks: At least two safety walks per site annually, totalling a minimum of 280 walks across operations.
- Safety e-Learning: Achieve 100% participation of active employees in Gasum's safety e-training (2023: 76%).

In 2025, the company did not achieve its safety target of zero injuries for employees and contractors. The total number of recordable injuries amounted to 17 (7 in 2024), including 12 Lost Time Injuries (LTI; 3 in 2024), 5 Medical Treatment Injuries (MTI; 3 in 2024), and 0 Restricted Work Injuries (RWI; 1 in 2024). The Total Recordable Injury Frequency (TRIF) was 28.1 (12.2 in 2024), while the Lost Time Injury Frequency (LTIF) was 19.8 (5.2 in 2024).

At the end of 2025, a fatal incident occurred involving a driver employed by a transportation contractor at a biogas plant in Sweden. The incident is currently under investigation by authorities in line with applicable regulatory requirements and internal procedures. At the time of reporting, Gasum has not been subject to allegations of misconduct or malpractice in connection with the incident.

Following the incident and in response to overall safety performance, the company strengthened its safety governance by establishing a dedicated HSEQ taskforce at the end of 2025. The taskforce focuses on strengthening risk management,

contractor safety, operational controls and consistent implementation of safety practices across operations.

Although the safety performance indicators reflect a negative trend compared to the previous year, they underline the importance of continued focus on operational discipline, effective risk management, and personal responsibility for safety among all employees and contractors. All significant incidents were investigated in accordance with internal procedures, and lessons learned were communicated across the organization to reduce the risk of recurrence.

In line with the company's proactive safety culture 4,084 safety observations were recorded in 2025 (2,887 in 2024), and 951 safety walks were conducted (290 in 2024). Identified corrective and preventive actions were implemented as part of the company's ongoing efforts to strengthen occupational health and safety performance.

Accounting principles

- LTI (Lost time injury): Injured person needs external medical attention and will have to take sick leave at least one day after the accident day. Source; recordings in corporate HSEQ software reporting tool all and corporate Human resources systems own employees.
- TRIF (total recordable injury frequency): number of injuries/ total working hours*1 000 000 (incl. LTI, MTI, RWI). Source; actual working hours from payroll work time monitoring solutions, number of injuries from corporate HSEQ reporting software tool.
- Safety walks (SW): recording of SW's number annually. Source; corporate HSEQ reporting software tool.
- Safety e-learning: mandatory training for all in Gasum Academy. Source; corporate Human Resources systems: completion rate of all permanent and active employees to complete it every second year.

Health and well-being

Gasum has set the following targets regarding health and well-being in the workplace:

- Absence rates: Target of maintaining an absence rate below 2% across the organization.
- Pulse Surveys: Minimum of 70% employee participation in continuous pulse surveys.
- Employee Experience Score: Maintain a total average score of at least 8 on a scale of 1 to 10.
- Development Discussions: 100% of permanent and active employees participate in annual development discussions.

Gasum's absence rate in 2025 was 2.5%, which is above the target of less than 2%. Employee engagement and cultural development are measured via continuous pulse surveys. In 2025, participation reached 71%, slightly above the 70% target, while the total average employee experience score was 8 on a scale of 1 to 10, meeting the defined target level. Ongoing actions within teams include leadership capability building, cross-functional collaboration initiatives, and transparent communication practices to further improve participation rates and engagement scores.

Gasum achieved a high rate of completed development discussions in 2025, with 95% of permanent and active employees participating. This performance is in line with previous years and close to the 100% target. The process is being promoted through communication of the importance of the discussions in creating a shared understanding of future direction and focus areas. Moreover, it also provides employees with an opportunity to discuss their job, professional development, skills, motivation, and wellbeing, offering valuable insights to the line manager.

Accounting principles

Gasum's people reporting builds upon headcount figures covering its own employees. The figures reflect the end-of-year situation. All employee's data is collected through the HR system. As a person cannot legally register as having a third gender in all Gasum countries, and due to the sensitivity of the data, the 'Other' and 'Not reported' categories are not included in the gender split.

The data on employee turnover is calculated by sharing the number of permanent employees leaving the company during 2025 to the number of permanent employees at the year-end.

S1-6 Characteristics of the undertaking's employees

Number of employees (head count)

Gender	Number of Employees (Head Count)
Male	277
Female	103
Other	na
Not Reported	na
Total Employees	**380**

Average number of employees (head count)

Gender	Number of Employees (FTE)
Male	274
Female	102
Other	na
Not Reported	na
Total Employees	**375**

Number of employees in countries

Country	Number of Employees (Head Count)
Finland	208
Sweden	128
Norway	39
Denmark	3
Germany	2
Total Employees	**380**

Characteristics of undertaking's employees - information on employees by contract type and gender

[reporting period]

Female	Male	Other*	Not Disclosed	Total
Number of full-time employees (head count/ FTE)				
100	269	na	na	369
Number of permanent employees (head count/ FTE)				
99	266	na	na	365
Number of temporary employees (head count/ FTE)				
4	11	na	na	15
Number of non-guaranteed hours employees (head count/ FTE)				
0	0	na	na	0
Number of full-time employees (head count/ FTE)				
100	269	na	na	369
Number of part-time employees (head count/ FTE)				
3	8	na	na	11

S1-14 Health and safety metrics

Health and safety metrics	
Percentage of own workforce who are covered by health and safety management system, own employees, %	100%
Number of recordable work-related accidents for own workforce and value chain workers	17
Employees	5
Contractor's employees	12
The number of fatalities as a result of work-related injuries and work-related ill health	1
Employees	0
Contractor's employees	1
Total Recordable Injury Frequency (TRIF), injuries per million working hour	28.1
Employees	8.3
All, employees and contractor's employees	28.1
The number of cases of recordable work related ill health, employees	5
The number of days lost to work-related injuries and fatalities, employees	22

Accounting principles

Gasum reports Total Recordable Incidents (TRI) based on international Occupational Health and Safety (OHSA) definitions.

The share of Gasum's workforce covered by health and safety management systems refers to employees within externally certified systems (e.g. ISO 45001).

Total Recordable Injuries (TRI) represents the aggregate number of recordable workplace injury cases. This total consists of Lost-Time Injuries (LTI), Restricted Workday Injuries (RWI) and Medical Treatment Injuries (MTI).

A work-related fatality refers to a workplace incident that causes injuries leading to death within twelve months from the date of the event.

Total Recordable Injury Frequency (TRIF) indicates the number of total recordable injuries per one million hours worked.

Lost-Time Injury Frequency (LTIF) measures the number of lost-time injury cases, including fatalities, per one million working hours.

An occupational disease is an illness that develops due to prolonged or repeated exposure to risk factors arising from work activities.

During 2025, the scope of health and safety reporting was expanded to cover operations in Denmark and Germany.

S1-17 Incidents, complaints and severe human rights impacts

Gasum's potential incidents of concerns, non-compliance cases or suspected misconduct cases relating to human rights violations, discrimination, and number of complaints are documented in the whistle blowing channel offered to both employees and business partners. The metrics related to incidents and complaints cover work-related incidents of discrimination and other complaints related to the Group's own workforce. The potential incidents cover yearly reported incidents. In 2025, there were no grievances related to human rights filed through Gasum's reporting channels.

S2 - Workers in the Value Chain

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

Gasum's strategy relies on a broad network of partners and contractors, particularly in upstream activities such as biogas production, logistics, and site operations. Workers in these parts of the value chain may face material health and safety risks due to the operational environments and the nature of their tasks. These risks, identified through Gasum's double materiality assessment, are closely linked to the Group's ability to deliver secure and sustainable low-carbon energy solutions.

When identifying the types of value chain workers who are or could potentially be negatively affected, Gasum focuses on countries and value chains where the company employs large numbers of people, both directly or indirectly, and on the high-risk categories. Direct upstream value chain workers at Gasum's sites may face higher risks due to industrial processes. Gasum's material impacts affect the workers of contractors and subcontractors involved in site operations, biogas plant and filling station construction work, and transportation. These workers are governed by Gasum's Code of Conduct for Business Partners and are subject to elevated health and safety risks due to their roles.

While these actual and potential impacts have not led to structural changes in Gasum's business model, they have strengthened the Group's strategic emphasis on safety. Gasum has extended its corporate safety objectives to include external personnel working at its sites. Findings from human rights due diligence and safety risk assessments inform continuous improvements in supplier management, procurement processes, and operational safety standards.

Gasum has not identified any specific geographies with a systemic risk of child or forced labor. However, operations further along the supply chain may involve sourcing from regions with elevated human rights risks. Gasum's Code of Conduct for Business Partners prohibits all forms of child and forced labor. In the Nordic countries, strong regulatory frameworks, government oversight and compliance with the rule of law reduce the risks in the business environment.

S2-1 Policies related to value chain workers

Gasum is committed to respecting human and labor rights throughout its value chain. The company manages its material impacts, risks, and opportunities related to value chain workers through a set of binding policies, including the Code of Conduct for Business Partners and Procurement Principles. These policies apply to all suppliers, subcontractors, and their personnel. Adherence is particularly important in upstream activities such as biogas production, logistics, and site operations, where occupational safety risks are most pronounced. In addition, Gasum's publicly available Human Rights Policy further defines the company's approach to assessing human rights throughout its operations.

Gasum's Code of Conduct for Business Partners

Gasum's Code of Conduct for Business Partners is integrated into supplier agreements, primarily using Gasum's supplier agreement templates (mainly for A and B suppliers, as defined in section S2-5), and sets mandatory sustainability requirements. It includes provisions on occupational health and safety and explicitly prohibits child labor and forced labor. While the Code of Conduct for Business Partners does not expressly reference human trafficking, it aligns with international standards such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

The policy is publicly available and applies to suppliers, subcontractors, and their workers. Policy implementation is overseen by the Gasum Management Team, supported by supplier reviews, audits, and capacity-building efforts.

Procurement Principles

The Procurement Principles were launched in 2024 and outline the main principles and framework for procurement in the Gasum Group. The Gasum Management Team has approved them as part of Gasum's Corporate Governance framework under Gasum's Code of Conduct. The Management's detailed guidelines and work instructions complement these principles. Common process descriptions are depicted in the Integrated Management System (IMS). These Principles are followed by all Gasum personnel and all Units under Gasum's governance, including all subsidiaries. The relevant parts of these Principles

will also be introduced to associated companies and their value chain workers. The Gasum Management Team reviews these principles on an annual basis.

Human Rights Policy

Gasum's Human Rights Policy outlines the process for identifying and assessing actual and potential human rights impacts, with special attention to vulnerable groups. They also provide mechanisms for grievance reporting and remediation. Where Gasum identifies that it has caused or contributed to adverse impacts, it is committed to engaging with affected parties to deliver appropriate remedy.

No severe human rights violations related to the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises were identified in 2025.

S2-2 Processes for engaging with value chain workers about impacts

Gasum recognizes the importance of incorporating the perspectives of value chain workers in identifying and managing actual and potential impacts, particularly in upstream activities such as biogas production, logistics, and site operations. Workers' perspectives are indirectly captured through established supplier management practices.

Regular collaboration with suppliers includes joint site meetings, safety inspections, and ongoing monitoring of contractor safety performance – especially at Gasum-operated sites. These interactions offer valuable insights into working conditions and operational risks. Outcomes from these engagements are integrated into supplier evaluations and considered by the responsible business functions when shaping procurement practices and operational safety procedures.

Gasum also considers worker perspectives in the development of supplier review and audit frameworks. In addition, a publicly accessible whistleblowing channel enables all stakeholders, including subcontracted workers, to confidentially raise concerns or report suspected misconduct.

S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns

Gasum has established processes to address and remedy negative impacts on value chain workers, guided by its Procurement Policy and Code of Conduct for Business Partners. Where actual or potential labor-related impacts are identified, a cross-functional team coordinates a corrective action plan with the supplier. Outcomes are tracked in the company's quality management system. The effectiveness of each case is assessed individually, considering the local context and severity, and corrective actions are tracked through follow-up audits.

Value chain workers can raise concerns safely and anonymously via Gasum's independent, multilingual whistleblowing channel, available 24/7. Suppliers are also required to maintain accessible grievance mechanisms for their employees and subcontractors.

Confirmed non-compliances are investigated by an independent team. If critical issues persist or a supplier shows unwillingness to improve, the business relationship may be terminated. Gasum prohibits retaliation against any individual who raises concerns in good faith and continues to strengthen awareness and trust in these channels across the value chain.

For more on grievance mechanisms and whistleblower protection, see ESRS G1-1.

S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

Gasum is committed to promoting fair and safe working conditions across its supply chain. I n 2025, the company took important steps to better identify and manage risks related to the health, safety, and rights of workers in its upstream value chain. This included strengthening supplier assessments and advancing human rights due diligence. In addition, Gasum continued its work to enhance health and safety practices across its supply chain.

Health and safety

In 2025, Gasum took concrete steps to improve occupational health and safety among value chain workers, including contractors, transport service providers, and construction partners. These actions support the company's broader objective of ensuring safe working environments, preventing

harm, and managing risks related to external workforce operations.

A targeted work safety campaign was launched to ensure that all service providers operating at Gasum sites are aware of and comply with safety requirements. The campaign addressed mandatory safety training, correct use of personal protective equipment (PPE), and safe working practices specific to the operational environment.

In response to safety observations and feedback received from external partners, a range of technical and procedural improvements were implemented. These included the installation of new warning signs and protective barriers at biogas plant operational areas, as well as the procurement of additional portable gas detectors to be lent to contractors lacking their own equipment.

Site access procedures for raw material deliveries were also enhanced. The updated process includes verification of both driver identity and completion of required safety training prior to site entry. These measures reduce the risk of untrained personnel operating in hazardous areas and reinforce compliance with Gasum's safety protocols.

Service providers involved in construction projects were trained in the use of Gasum's internal safety observation and reporting tool, the Quentic system. This digital platform facilitates systematic recording and follow-up of safety-related observations and supports transparent communication between the company and its external partners.

Supplier reviews and audits

In 2025, Gasum updated its supplier review model and audit framework to enhance oversight of human rights, occupational safety, and working conditions across its upstream value chain. The revised approach places greater emphasis on risk-based assessment, focusing on high-impact sectors, including biogas production, logistics, and maintenance services. The updated framework incorporates structured review templates, enhanced follow-up processes, and clearer escalation pathways for cases of non-compliance. In 2025, 60% of category A suppliers completed the supplier review process. Additionally, Gasum completed an internal review for 85% of category A suppliers.

In addition, Gasum's supplier audit model was updated in 2025 to strengthen oversight and ensure alignment with the company's sustainability and compliance expectations. As part of this work, internal audits were conducted on six suppliers during the year. Findings from these reviews and audits have shown that, overall, Gasum's suppliers take the Code of Conduct for Business Partners seriously and do their best to follow it.

Gasum will further develop its supplier review and audit reporting to get more detailed statistics on its supplier base. Thus, the implementation of the revised model, which commenced in 2025, will continue in 2026 to enhance consistency, transparency, and the early detection of material sustainability risks. Outcomes of the audits directly inform risk management and procurement decisions.

Human rights risk assessment

In 2025, Gasum conducted a human rights risk assessment covering its upstream value chain, identifying material risks primarily related to occupational health, safety, and working conditions. Based on these findings, the company will implement targeted preventive and mitigating measures as part of its commitment to responsible supply chain management.

These risks are addressed through binding policies, including the Code of Conduct for Business Partners and the Group Procurement Policy, which require suppliers to uphold robust labor and safety standards. All critical suppliers are contractually obligated to comply with these requirements. Gasum conducts regular onboarding reviews, health and safety audits, and site inspections to monitor compliance and identify potential gaps. When adverse impacts are identified, the company engages collaboratively with suppliers to implement corrective actions and ensures follow-up to verify that the issues have been effectively resolved.

S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

In 2025, Gasum introduced a continuous improvement target aimed at promoting responsible sourcing and reinforcing high standards for human rights, occupational safety, and working conditions across its supply chain. The target is to ensure that a minimum of 80% of the company's total supplier spend is from suppliers committed to Gasum's Code of Conduct for Business Partners.

This target applies to A- and B-level suppliers, defined based on their criticality to business continuity:

- A-level suppliers are essential to core operations and are difficult to replace in the short term.
- B-level suppliers are important to operations but can be more readily replaced, either due to the availability of alternative suppliers or the non-unique nature of their goods or services.

The target was set in 2025 in alignment with Gasum's updated Supplier Code of Conduct and forms part of the company's broader risk management and supply chain sustainability strategy. While the objective is long-term in nature, monitoring of progress will begin in 2026.

Due to the nature and scope of the target, Gasum has not conducted direct engagement with individual value chain workers or their representatives in its supplier network. The target is based on a risk assessment of supplier relationships and informed by internationally recognized sustainability frameworks and business conduct expectations.

Governance information

G1 – Business Conduct

G1-1 Business conduct policies and corporate culture

Corporate culture

Gasum aims to promote strong, transparent and sustainable corporate culture in its day-to-day operations and communications. Corporate culture is developed and cultivated in various ways.

Compliance is built on the Group's governance structure, headed by the Code of Conduct that guides the company in doing business responsibly, as well as the Group Corporate Governance Policy that sets out the framework of governance and responsibilities in the company.

Gasum has in cooperation with personnel established three core values the company aims to at all times reflect in its business conduct: **respect**, **sustainability** and **positive energy**. The core values are complemented by the Gasum Compass, which defines how the values show in the everyday work of every employee.

Internal communications have a major role in promoting corporate culture and its core values. Gasum holds bi-weekly info sessions to the entire group, focusing on strategy and various other topics, giving out important information and insight to the work of different Units. The info sessions regularly cover themes of sustainability and highlight sustainability topics relevant in various parts of the organization.

Each employee is invited to participate in the employee survey regularly. Through the employee satisfaction survey, the employees can give feedback on several corporate culture matters, including how well Gasum values are reflected in their work environment and whether their team has implemented actions based on the results of previous surveys. The results of the survey are published internally for all employees and discussed in each team, in the Gasum Management Team and in the HR Committee of the Board of Directors, and actions are taken to improve personnel's experience.

Gasum Management Team members each head a Unit and have responsibility to promote the strategy and values and to ensure compliance with the Code of Conduct, Group Corporate Governance Policy and other relevant policies and principles in their Units. Support functions such as HR, Finance, Risk Management, Legal & Compliance and IT support the other Units in their area of expertise. Further, the internal audit function, performed by an independent internal auditor, verifies practices on selected focus areas, varying each year, and gives improvement recommendations.

The company has established a group-wide Ethics, Compliance and Risk (ECR) network, with representatives from all Units and named Code of Conduct area owners. The purpose of the ECR network is to enable better information flow between Units and emphasize the importance of ethics, compliance and risk management work in each Gasum Unit in their daily operations. The ECR network facilitates communication between Gasum Units, the Gasum Management Team and the Risk Management and Compliance functions.

The Gasum Compass

"The Gasum Compass is our guide on how to live our values. It tells us how we treat each other and our customers and helps us keep the right direction every day."

We learn, share and develop

By sharing information and collaborating, we improve our ways of working continuously. We explore new opportunities for improvement with open minds.

We deliver on our promises

This means promises to both customers as well as colleagues. We care for Gasum's success and the success of our customers.

We build a safe environment together

Safety means both physical and psychological safety. A safe work environment means zero injuries as well as trust and respect in each interaction we have.

We celebrate and give praise to each other

We have fun at work together. We encourage and energize the people around us and make each other successful.

Most important policies, principles and guidelines

Code of Conduct for employees

The purpose of the Gasum Code of Conduct is to assist Gasum employees in understanding and internalizing responsible business practices in their day-to-day work. The Code of Conduct describes the Gasum way of working with customers and stakeholders as well as together as an organization.

The Gasum Code of Conduct is approved and regularly reviewed by the Gasum Board of Directors and publicly available for all stakeholders on Gasum's website. The Code of Conduct concerns the entire Gasum Group.

Each Gasum employee, as well as the members of the Board of Directors, are expected to complete a mandatory Code of Conduct online training as a part of their onboarding program and every two years thereafter. Gasum's target is 100% completion rate for the online training. At the end of 2025, 93% of the employees and 100% of the members of the Board of Directors had valid record for completing the online training. Each employee gets an email reminder before their training record expires.

Gasum Group Corporate Governance Policy, Ethics & Compliance Policy

The Gasum Group Corporate Governance Policy defines the main corporate governance rules of the Gasum Group. It sets out the legal framework and decision-making powers of different corporate bodies and determines the operational instructions for Gasum's daily operations, authorization instructions and approval limits concerning the approval of commitments for the company, approval of invoices and personnel-related approvals.

The Group Corporate Governance Policy is supported by the Ethics & Compliance Policy, outlining the governance, principles as well as the roles and responsibilities of Gasum's ethics and compliance work. Gasum's ethics and compliance work supports and oversees the implementation of responsible business practices as defined in the Gasum Code of Conduct and includes for example whistleblowing, human rights, anti-corruption, competition, privacy, trade sanctions and business partner management.

Both the Gasum Group Corporate Governance Policy and the Gasum Group Ethics & Compliance Policy are approved by the Board of Directors.

Procurement Principles and Code of Conduct for Business Partners

Gasum's Procurement Principles outline the main principles and framework for procurement in Gasum Group, including the objectives of Gasum's procurement operations, the organization of procurement responsibilities and Gasum's supplier management processes. The Procurement Principles are further complemented with management's detailed guidelines and work instructions.

Further, Gasum has a Code of Conduct for Business Partners that describes Gasum's expectations for its supply chain and other business partners. The topics covered in the Business Partner Code of Conduct are on high level the same ones covered in the Gasum Code of Conduct for employees, to highlight that Gasum requires that its business partners commit to the same responsible business practices as Gasum itself. The Code of Conduct for Business Partners is a key tool in how Gasum communicates its business conduct expectations and requirements to business partners.

The Procurement Principles and the Business Partner Code of Conduct are approved by Gasum Management Team as a part of Gasum's Corporate Governance framework under Gasum's Code of Conduct.

Anti-Bribery and Corruption Policy

Gasum has an Anti-Bribery and Corruption Policy, which applies to all employees, management, and third parties acting on Gasum's behalf. The Policy is based on Gasum's assessment of the identified key bribery and corruption risks relating to its operations. All forms of bribery and corruption, including the offering or acceptance of anything of value to improperly influence business decisions, is prohibited.

The Anti-Bribery and Corruption Policy is approved and annually reviewed by the Board of Directors.

Human Rights Policy

Gasum's Human Rights Policy sets out Gasum's commitment to respecting human rights throughout its own operations and across its value chain, including description of Gasum's human rights due diligence processes, grievance mechanisms, remedy actions, performance measurement and reporting as well as the roles and responsibilities relating to human rights. The Policy is based on Gasum's assessment of the identified key human rights risks relating to its operations.

The Human Rights Policy is approved and annually reviewed by the Board of Directors.

Risk policies

Gasum's risk policies include the Enterprise Risk Management Policy, Counterparty and Credit Risk Policy, Commodity Risk Policy and Treasury Policy. The policies are complemented with management's detailed guidelines and work instructions. Since energy is at the core of Gasum's business and strategy, the risk policies have an important role in regulating the impacts, risks and opportunities relating to Gasum's operations.

The risk policies are approved and annually reviewed by the Board of Directors.

Information Security Policy & ISMS documentation

The Gasum Information Security Policy contains the key objectives of the Gasum Information Security Management System (ISMS), which is based on the ISO/IEC 27001:2013 requirements. The ISMS sets out the rules and principles on relevant information security topics, such as access control, incident response management, information security awareness and risk management, physical security and supplier relationships.

The Gasum Information Security Policy is approved by the CEO, and its key objectives are monitored by the Gasum Information and Cybersecurity Committee.

Speaking up and whistleblowing channel

Gasum Oy is subject to the Finnish Act on the Protection of Persons Reporting Violations of the European Union and National Law, transposing Directive (EU) 2019/1937 (the so-called Whistleblower Directive). Swedish group company Gasum AB is also subject to the national laws transposing the Whistleblower Directive.

Gasum encourages and expects all employees, as well as business partners and other stakeholders, to report concerns, incidents of non-compliance or suspected misconduct using the appropriate reporting channels. Employees can address their concerns to their line manager, the HR function or the Group Compliance Officer, or they can file a report via the Gasum whistleblowing channel, which can be used anonymously. The Gasum whistleblowing channel is open to all stakeholders on Gasum's website.

The whistleblowing channel can be used for issues covered by the whistleblowing legislation and for any suspected non-compliance of the Code of Conduct. Any person filing whistleblowing reports in good faith is protected against retaliation and negative consequences.

All reports are handled confidentially and investigated by Gasum's whistleblowing team, consisting of the Group Compliance Officer and the Head of Human Resources. The whistleblowing team involves other relevant persons needed to investigate the suspected misconduct. Persons who may be connected to the suspected misconduct may not investigate the report in question. The Group Compliance Officer reports to the CEO and the Audit and Risk Committee of the Board of Directors on whistleblowing reports and related investigations.

G1-2 Management of relationships with suppliers

Gasum manages relationships with its suppliers primarily via agreements, the Gasum Code of Conduct for Business Partners and supplier assessments. The supplier's employees working on sites and tasks where occupational safety is a specific focus area, such as biogas production, logistics, and maintenance services, are required to complete safety training.

Gasum communicates expectations and requirements towards its suppliers and business partners through contracts and the Gasum Code of Conduct for Business Partners. Gasum's agreements with suppliers include payment and delivery terms, and other terms relevant for the business relationship. The company has organized and monitors the accounts payable operations and invoice approval processes with the aim of ensuring that all invoices are processed and payments made on time.

Gasum categorizes suppliers based on their importance to Gasum's operations, and Gasum conducts supplier assessments based on the supplier category requirements. Gasum's supplier assessment model (including reviews and audits) was updated in 2025 to strengthen oversight and ensure alignment with the company's sustainability and compliance expectations. Gasum also engages with suppliers through joint site meetings, safety inspections, and training initiatives, including the use of the Quentic system for logging safety observations. These interactions help capture supplier and worker perspectives and inform procurement decisions and operational improvements. Gasum has a Vendor Portal available for managing supplier related data and assessments. Gasum works to embed its sustainability commitments within the value chain by considering suppliers' environmental specifications and operational impacts on stakeholders. Gasum's sustainability requirements also vary depending on the type of procurement. These are monitored through KPI reporting on a supplier level.

Gasum's policies and actions relating to suppliers are described in more detail in sections S2-1 Policies related to value chain workers and S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions.

G1-3 Prevention and detection of corruption and bribery

Gasum is committed to conducting business ethically and in compliance with applicable laws and regulations. The company's approach to preventing and addressing corruption and bribery is defined in the Gasum Code of Conduct and further detailed in the Anti-Bribery and Corruption Policy, which forms an integral part of the Code of Conduct.

The Anti-Bribery and Corruption Policy provides guidance on preventing bribery and corruption and outlines the process for identifying, investigating and addressing suspected or confirmed violations. These procedures are designed to ensure timely response, appropriate remediation and mitigation of potential broader impacts.

When a potential violation is identified, an investigation is initiated. Investigations are conducted by individuals who are independent of the case and not within the same line management as the persons whose actions are under review. Findings from investigations are reported to the relevant line management. Where appropriate, outcomes are escalated to the Gasum Management Team, the Board of Directors and, when required, relevant supervisory authorities.

Gasum's policies are made accessible to employees through the company intranet. In addition, the Anti-Bribery and Corruption Policy and the Codes of Conduct for employees and business partners are publicly available on Gasum's website, supporting transparency towards stakeholders.

All employees, including individuals in higher-risk functions, members of administrative, supervisory and management bodies are required to complete mandatory Code of Conduct training every two years. The training covers the core principles of responsible business conduct, including ethical behavior and compliance expectations related to corruption and bribery. Gasum does not currently operate a separate formal anti-bribery and anti-corruption training program, therefore the percentage of functions at-risk covered by such training is 0%.

The Group Compliance function is responsible for the Anti-Bribery and Corruption Policy and provides guidance and support on its interpretation and application.

G1-4 Incidents of corruption or bribery

During the reporting period, Gasum has not become aware of any breaches or violations relating to bribery or corruption in the company or its management, nor has it been subject to any fines or sanctions relating to bribery and corruption.

Appendices

Disclosures stemming from other legislation

	Related datapoint	Sustainability disclosure	SFDR (Sustainable Finance Disclosures Regulation) reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Additional information	Page number
369/*	Paragraph 21 (d)	Board's gender diversity	Indicator number 13 of Table #1 of Annex I		Commission Delegated Regulation (EU) 2020/1816, Annex II			10
ESRS 2 GOV-1	Paragraph 21 (e)	Percentage of board members who are independent			Delegated Regulation (EU) 2020/1816, Annex II			10
ESRS 2 GOV-4	Paragraph 30	Statement on due diligence	Indicator number 10 Table #3 of Annex I					12
ESRS 2 SBM-1	Paragraph 40 (d) i	Involvement in activities related to fossil fuel activities	Indicators number 4 Table #1 of Annex I	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II			13
ESRS 2 SBM-1	Paragraph 40 (d) ii	Involvement in activities related to chemical production	Indicator number 9 Table #2 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS 2 SBM-1	Paragraph 40 (d) iii	Involvement in activities related to controversial weapons	Indicator number 14 Table #1 of Annex I		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS 2 SBM-1	Paragraph 40 (d) iv	Involvement in activities related to cultivation and production of tobacco			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS E1-1	Paragraph 14	Transition plan to reach climate neutrality by 2050				Regulation (EU) 2021/1119, Article 2(1)		28

	Related datapoint	Sustainability disclosure	SFDR (Sustainable Finance Disclosures Regulation) reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Additional information	Page number
ESRS E1-1	Paragraph 16 (g)	Undertakings excluded from Paris-aligned Benchmarks		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2			28
ESRS E1-4	Paragraph 34	GHG emission reduction targets	Indicator number 4 Table #2 of Annex I	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6			32
ESRS E1-5	Paragraph 38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex I					33
ESRS E1-5	Paragraph 37	Energy consumption and mix	Indicator number 5 Table #1 of Annex I					33
ESRS E1-5	Paragraphs 40–43	Energy intensity associated with activities in high climate impact sectors	Indicator number 6 Table #1 of Annex I					33

	Related datapoint	Sustainability disclosure	SFDR (Sustainable Finance Disclosures Regulation) reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Additional information	Page number
ESRS E1-6	Paragraph 44	Gross Scope 1, 2, 3 and Total GHG emissions	Indicators number 1 and 2 Table #1 of Annex I	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)			34
ESRS E1-6	Paragraphs 53–55	Gross GHG emissions intensity	Indicators number 3 Table #1 of Annex I	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)			35
ESRS E1-7	Paragraph 56	GHG removals and carbon credits				Regulation (EU) 2021/1119, Article 2(1)	Not material	
ESRS E1-9	Paragraph 66	Exposure of the benchmark portfolio to climate-related physical risks			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Phased-in, not reported	
ESRS E1-9	Paragraph 66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Phased-in, not reported	

	Related datapoint	Sustainability disclosure	SFDR (Sustainable Finance Disclosures Regulation) reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Additional information	Page number
ESRS E1-9	Paragraph 66 (c)	Location of significant assets at material physical risk					Phased-in, not reported	
ESRS E1-9	Paragraph 67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2:Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Phased-in, not reported	
ESRS E1-9	Paragraph 69	Degree of exposure of the portfolio to climate-related opportunities			Delegated Regulation (EU) 2020/1818, Annex II		Phased-in, not reported	
ESRS E2-4	Paragraph 28	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	Indicator number 8 Table #1 of Annex I Indicator number 2 Table #2 of Annex I Indicator number 1 Table #2 of Annex I Indicator number 3 Table #2 of Annex I				Not material	
ESRS E3-1	Paragraph 9	Water and marine resources	Indicator number 7 Table #2 of Annex I				Not material	
ESRS E3-1	Paragraph 13	Dedicated policy	Indicator number 8 Table 2 of Annex I				Not material	
ESRS E3-1	Paragraph 14	Sustainable oceans and seas	Indicator number 12 Table #2 of Annex I				Not material	
ESRS E3-4	Paragraph 28 (c)	Total water recycled and reused	Indicator number 6.2 Table #2 of Annex I				Not material	

	Related datapoint	Sustainability disclosure	SFDR (Sustainable Finance Disclosures Regulation) reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Additional information	Page number
ESRS E3-4	Paragraph 29	Total water consumption in m3 per net revenue on own operations	Indicator number 6.1 Table #2 of Annex I				Not material	
ESRS 2 – IRO-1 – E4	Paragraph 16 (a) i		Indicator number 7 Table #1 of Annex I				Not material	
ESRS 2 – IRO-1 – E4	Paragraph 16 (b)		Indicator number 10 Table #2 of Annex I				Not material	
ESRS 2 – IRO-1 – E4	Paragraph 16 (c)		Indicator number 14 Table #2 of Annex I				Not material	
ESRS E4-2	Paragraph 24 (b)	Sustainable land / agriculture practices or policies	Indicator number 11 Table #2 of Annex I				Not material	
ESRS E4-2	Paragraph 24 (c)	Sustainable oceans / seas practices or policies	Indicator number 12 Table #2 of Annex I				Not material	
ESRS E4-2	Paragraph 24 (d)	Policies to address deforestation	Indicator number 15 Table #2 of Annex I				Not material	
ESRS E5-5	Paragraph 37 (d)	Non-recycled waste	Indicator number 13 Table #2 of Annex I					41
ESRS E5-5	Paragraph 39	Hazardous waste and radioactive waste	Indicator number 9 Table #1 of Annex I					41
ESRS 2 – SBM-3 – S1	Paragraph 14 (f)	Risk of incidents of forced labour	Indicator number 13 Table #3 of Annex I					43
ESRS 2 – SBM-3 – S1	Paragraph 14 (g)	Risk of incidents of child labour	Indicator number 12 Table #3 of Annex I					43
ESRS S1-1	Paragraph 20	Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I					55

	Related datapoint	Sustainability disclosure	SFDR (Sustainable Finance Disclosures Regulation) reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Additional information	Page number
ESRS S1-1	Paragraph 21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			Delegated Regulation (EU) 2020/1816, Annex II			43, 49
ESRS S1-1	Paragraph 22	Processes and measures for preventing trafficking in human beings	Indicator number 11 Table #3 of Annex I					49
ESRS S1-1	Paragraph 23	Workplace accident prevention policy or management system	Indicator number 1 Table #3 of Annex I					43
ESRS S1-3	Paragraph 32 (c)	Grievance/complaints handling mechanisms	Indicator number 5 Table #3 of Annex I					44, 50, 56
ESRS S1-14	Paragraph 88 (b) and (c)	Number of fatalities and number and rate of work-related	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II			45, 48
ESRS S1-14	Paragraph 88 (e)	Number of days lost to injuries, accidents, fatalities or illness	Indicator number 3 Table #3 of Annex I					48
ESRS S1-16	Paragraph 97 (a)	Unadjusted gender pay gap	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS S1-16	Paragraph 97 (b)	Excessive CEO pay ratio	Indicator number 8 Table #3 of Annex I				Not material	
ESRS S1-17	Paragraph 103 (a)	Incidents of discrimination	Indicator number 7 Table #3 of Annex I					48
ESRS S1-17	Paragraph 104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)			48

	Related datapoint	Sustainability disclosure	SFDR (Sustainable Finance Disclosures Regulation) reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Additional information	Page number
ESRS 2 – SBM-3 – S2	Paragraph 11 (b)	Significant risk of child labour or forced labour in the value chain	Indicators number 12 and n. 13 Table #3 of Annex I					49
ESRS S2-1	Paragraph 17	Human rights policy commitments	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex I					50
ESRS S2-1	Paragraph 18	Policies related to value chain workers	Indicator number 11 and n. 4 Table #3 of Annex I					49
ESRS S2-1	Paragraph 19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	Indicator number 10 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)			49
ESRS S2-1	Paragraph 19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			Delegated Regulation (EU) 2020/1816, Annex II			49
ESRS S2-4	Paragraph 36	Human rights issues and incidents connected to its upstream and downstream value chain	Indicator number 14 Table #3 of Annex I					50
ESRS S3-1	Paragraph 16	Human rights policy commitments	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex I				Not material	
ESRS S3-1	Paragraph 17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	Indicator number 10 Table #1 Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	
ESRS S3-4	Paragraph 36	Human rights issues and incidents	Indicator number 14 Table #3 of Annex I				Not material	

	Related datapoint	Sustainability disclosure	SFDR (Sustainable Finance Disclosures Regulation) reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Additional information	Page number
ESRS S4-1	Paragraph 16	Policies related to consumers and end-users	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Not material	
ESRS S4-1	Paragraph 17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	Indicator number 10 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II DelegatedRegulation (EU)2020/1818, Art 12 (1)		Not material	
ESRS S4-4	Paragraph 35	Human rights issues and incidents	Indicator number 14 Table #3 of Annex I				Not material	
ESRS G1-1	Paragraph 10 (b)	United Nations Convention against corruption	Indicator number 15 Table #3 of Annex I					55
ESRS G1-1	Paragraph 10 (d)	Protection of whistle-blowers	Indicator number 6 Table #3 of Annex I					56
ESRS G1-4	Paragraph 24 (a)	Fines for violation of anti-corruption and anti-bribery laws	Indicator number 17 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II			57
ESRS G1-4	Paragraph 24 (b)	Standards of anti-corruption and anti-bribery	Indicator number 16 Table #3 of Annex I					55, 57, 57

IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

56. Disclosure of list of ESRS Disclosure Requirements complied with in preparing sustainability statement following outcome of materiality assessment

General information

ESRS 2	General disclosures		
Disclosure Requirement		**Additional information**	**Page number**
BP-1	General basis for preparation of sustainability statements		9
BP-2	Disclosures in relation to specific circumstances		9
GOV-1	The role of the administrative, management and supervisory bodies		10
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies		11
GOV-3	Integration of sustainability-related performance in incentive schemes		12
GOV-4	Statement on due diligence		12
GOV-5	Risk management and internal controls over sustainability reporting		13
SBM-1	Strategy, business model and value chain		13
SBM-2	Interests and views of stakeholders		14
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model		15
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities		19
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement		20

Environmental information

ESRS E1 Climate change

Disclosure Requirement		Additional information	Page number
ESRS 2, GOV-3	Integration of sustainability-related performance in incentive schemes		12
E1-1	Transition plan for climate change mitigation	External limited assurance	28
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model		15
ESRS 2, IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities		19
E1-2	Policies related to climate change mitigation and adaptation	External limited assurance	30
E1-3	Actions and resources in relation to climate change policies	External limited assurance	31
E1-4	Targets related to climate change mitigation and adaptation	External limited assurance	32
E1-5	Energy consumption and mix	External limited assurance	33
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	External limited assurance	34
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Not material	
E1-8	Internal carbon pricing	Not material	
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Phased-in, not reported	

ESRS E2 Pollution

Disclosure Requirement		Additional information	Page number
ESRS 2, IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	Not material	
E2-1	Policies related to pollution	Not material	
E2-2	Actions and resources related to pollution	Not material	
E2-3	Targets related to pollution	Not material	
E2-4	Pollution of air, water and soil	Not material	
E2-5	Substances of concern and substances of very high concern	Not material	
E2-6	Anticipated financial effects from pollution-related impacts, risks and opportunities	Not material	

ESRS E3 Water and marine resources

Disclosure Requirement		Additional information	Page number
ESRS 2, IRO-1	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	Not material	
E3-1	Policies related to water and marine resources	Not material	
E3-2	Actions and resources related to water and marine resources	Not material	
E3-3	Targets related to water and marine resources	Not material	
E3-4	Water consumption	Not material	
E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	Not material	

ESRS E4 Biodiversity and ecosystems

E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Not material	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Not material	
ESRS 2, IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	Not material	
E4-2	Policies related to biodiversity and ecosystems	Not material	
E4-3	Actions and resources related to biodiversity and ecosystems	Not material	
E4-4	Targets related to biodiversity and ecosystems	Not material	
E4-5	Impact metrics related to biodiversity and ecosystems change	Not material	
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Not material	

ESRS E5 Resource use and circular economy

Disclosure Requirement		Additional information	Page number
ESRS 2, IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities		19
E5-1	Policies related to resource use and circular economy	External limited assurance	38
E5-2	Actions and resources related to resource use and circular economy	External limited assurance including the increase of the total volume of renewable gas (TWh) sold by Gasum. Sustainability linked revolving loan KPI	38

E5-3	Targets related to resource use and circular economy	External limited assurance including the percentage on a well-to-wheel basis of average GHG emissions of the biogas producted in its own facilities as compared to fossil-based fuel calculated in accordance with Renewable Energy Directive. Sustainability linked revolving loan KPI	39
E5-4	Resource inflows	External limited assurance	40
E5-5	Resource outflows	External limited assurance	40
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	Phased-in, not reported	

Social information

ESRS S1 Own workforce

Disclosure Requirement		Additional information	Page number
ESRS 2, SBM-2	Interests and views of stakeholders		14
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model		15
S1-1	Policies related to own workforce		43
S1-2	Processes for engaging with own workers and workers' representatives about impacts		44
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns		44
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		44
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities		45
S1-6	Characteristics of the undertaking's employees		47
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	Not material	
S1-8	Collective bargaining coverage and social dialogue	Not material	
S1-9	Diversity metrics	Not material	
S1-10	Adequate wages	Not material	
S1-11	Social protection	Not material	
S1-12	Persons with disabilities	Not material	
S1-13	Training and skills development metrics	Not material	

S1-14	Health and safety metrics	External limited assurance for TRIF: the decrease of the trif of Gasum's own employees and contractor. Sustainability linked revolving loan	48
S1-15	Work-life balance metrics	Not material	
S1-16	Compensation metrics (pay gap and total compensation)	Not material	
S1-17	Incidents, complaints and severe human rights impacts		48

ESRS S2 Workers in the value chain

Disclosure Requirement		Additional information	Page number
ESRS 2, SBM-2	Interests and views of stakeholders		14
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model		15
S2-1	Policies related to value chain workers		49
S2-2	Processes for engaging with value chain workers about impacts		50
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns		50
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action		50
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities		51

ESRS S3 Affected communities

Disclosure Requirement		Additional information	Page number
ESRS 2, SBM-2	Interests and views of stakeholders	Not material	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Not material	
S3-1	Policies related to affected communities	Not material	
S3-2	Processes for engaging with affected communities about impacts	Not material	
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Not material	
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Not material	
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Not material	

ESRS S4	Consumers and end-users		
Disclosure Requirement		**Additional information**	**Page number**
ESRS 2, SBM-2	Interests and views of stakeholders	Not material	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Not material	
S4-1	Policies related to consumers and end-users	Not material	
S4-2	Processes for engaging with consumers and end-users about impacts	Not material	
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Not material	
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Not material	
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Not material	

Governance information

ESRS G1	Business conduct		
Disclosure Requirement		**Additional information**	**Page number**
ESRS 2, GOV-1	The role of the administrative, supervisory and management bodies		10
ESRS 2, IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities		19
G1-1	Corporate culture and business conduct policies and corporate culture		54
G1-2	Management of relationships with suppliers		56
G1-3	Prevention and detection of corruption and bribery		57
G1-4	Confirmed incidents of corruption or bribery		57
G1-5	Political influence and lobbying activities	Not material	
G1-6	Payment practices	Not material	

Green funding impact

Gasum's Green funding impact report highlights our investments into renewable energy and our contribution to the circular economy and climate change mitigation. The green financed loan raised under Gasum's Green Funding Framework is allocated to financing our assets in the biogas segment, which facilitates sustainable growth in the future and contributes to the UN Sustainable Development Goals.

Green funding framework

In 2023 Gasum issued a new Green Finance Framework, which is the company's second one. The first was issued in 2019. The Green Finance Framework is a document that defines the eligibility of certain projects and investments for green loans that Gasum uses for investing in its biogas operations.

Gasum's Green Finance Framework allows financing granted under the framework to be invested in research, production, and distribution of biogas and biofertilizers, energy efficiency measures and pollution prevention and control measures. Funds under Gasum's Green Finance Framework will exclusively be used for infrastructure related to biogas production and distribution.

Gasum's Green Finance Framework holds the top rating of Dark Green from independent ratings issuer Shades of Green. Dark green is the highest rating and is allocated to projects and solutions that correspond to the long-term vision of a low-carbon and climate resilient future.

Gasum's strengths in the Shades of Green assessment were, in particular, that Gasum's biogas is based on waste and circularity, thus avoiding potential issues related to competing land use for energy crops.

Shades of Green also gives a score for governance and has given Gasum a governance score of Excellent. Gasum has a long history of sustainability reporting and robust processes for emissions reporting and other environmental, social and governance aspects in line with legislation and standards.

Assets financed with green loans in 2025

During 2025 the amount of Gasum's green loan was EUR 175 million. The green loan is used to finance Gasum's strategic investments into increasing biogas production both by expanding biogas production at existing plants as well as construction of new large-scale plants. This equals 51% of the total amount of loans taken out from the credit facility at end of 2025 (51% in 2024).

Gasum continued investments in the green biogas assets, which are eligible within Gasum's Green Funding Framework. Operations covered under the green loan during 2025 spread across 20 locations in both Finland and Sweden. Projects in 2025 have included two green field construction projects as well as brown field projects aiming to increase the production capacity of biogas while simultaneously improving the efficiency of the plants.

Investing strongly in biogas production is part of Gasum's strategy to help our customers move towards a carbon neutral energy future. In the coming years Gasum is planning to construct five new large biogas plants in Sweden. During 2025 construction work on the first one of the five plants in Götene was completed and production commenced. Construction on the second one in Borlänge continued throughout the year. Expansion and improvement projects at existing plants in Finland and Sweden were concluded.

Expected environmental impact

Renewable energy production financed with green loans promotes positive climate impacts of the company's business. In 2025, the biogas production financed with green loans totalled approximately 900 GWh (2024: 768 GWh). The estimated annual greenhouse gas emissions reduction was 252,000 tons of CO_2 equivalent (2024: 186,000t).

Biogas produced by Gasum is 100% renewable. During the reporting year, biogas production met fully with the sustainability criteria laid down by the Renewable Energy Directive. The greenhouse gas emission reduction of our biogas averaged 95,7% (2024: 92,6%)

In 2025, the biogas plants utilized a wide base of biomass in biogas production. A total of 1,454,000 tons of biodegradable feedstocks were sourced from the food industry, retail outlets, municipalities, and agriculture, consisting of biodegradable waste and residues, municipal wastewater sludge, and agricultural by-products and crops. Biogas production enabled the reuse of biodegradable waste material as energy, thereby reducing the energy lost in processes such as waste combustion or composting.

In addition, around 1,480,000 tons of nutrient residues were generated as a by-product in the biogas production process. These are returned either as recycled nutrients for industry, or as recycled fertilizers for agriculture.

Our network of biogas plants improves economy of scale and efficiency and allows biomass processing to be optimized between plants depending on, for example, logistics, capacity, market conditions and different feedstocks. Relatively modern production assets, continuous work to improve energy efficiency and use of renewable electricity in all operations provide a good basis for emission control in Gasum's operations.

Impact calculation principle

Gasum reports in accordance with the European Sustainability Reporting Standards (ESRS) published by the European union and discloses more detailed sustainability targets, key indicators and related achievements in this Sustainability report 2025.

Climate impact

The estimated tons of CO_2eq emissions avoided because of assets to which green funding proceeds have been allocated, have been calculated according to methodologies and assumptions described below.

The evaluation is carried out based on plant-level emission calculations for 2025. The determination of emissions is based on the sustainability criteria guidelines provided by the Finnish Energy Authority and Swedish Energy Agency and is in accordance with the Renewable Energy Directive, which governed the climate impact calculation rules during the reporting year.

Emission calculations have been carried out in the context of Gasum's certified sustainability systems in Finland and Sweden. The sustainability systems and the emission calculations are verified annually by an independent certification body.

Greenhouse gas emissions from electricity use were calculated using grid emission factors of 47,2 gCO_2eq/kWh for Finland and 26 gCO_2eq/kWh for Sweden. For assessing emission reductions, the applied fossil fuel comparators were 94 gCO_2eq/MJ for transport use, 80 gCO_2eq/MJ for production of useful heat, heating and/or cooling, and 183 gCO_2eq/MJ for electricity production. Carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) emissions are considered in the total climate impact with GWP100 values defined in RED (25 for CH_4 and 298 for N_2O).

Water management

Gasum aims to utilize recycled water in the biogas production process as much as possible. Municipal water use varies annually for many reasons, during 2025 Gasum new plants increased total consumption.

Gasum views the internal recycling of reject water as an economical and environmentally sound solution for operating biogas plants. Internal recycling improves the plants' heat balance and reduces the amount of wastewater. Water consumption is also reduced by utilizing site stormwaters in the biogas process. Utilization of water and water balance for processes are followed on plant level.

Some plants are equipped with efficient technologies for water purification and recovery of nutrients and organic carbon. Increased recovery of nutrients helps to lower the environmental load of effluent before discharging it into a wastewater treatment plant or recycling it back to nature.

Some of the nutrient-rich excess process water is utilized in the forest industry as a nitrogen source for microbes at wastewater treatment plants. In Gasum's LNG supply chain, sea water is used as ballast water in the vessels. After use, the ballast water is released back into the sea unpolluted. Most of our freshwater consumption is as process water in biogas plants, use of tap water in offices is not significant.

Consumption, m3	2025	2024	2023	2022	2021
Municipal water	268,537	202,000	90,000	172,000	189,000
Groundwater	0	70,000	180,000	34,000	48,000
Seawater	133,509	143,000	130,000	127,000	140,000
Surface water	138,654	9,000	8,000	7,000	8,000

Independent limited assurance report

To the management of Gasum Oy

Scope of assurance

At the request of Gasum Oy (0969819-3, hereinafter also the Company) management, we have performed a limited assurance engagement, the subject of which is the selected sustainability information in more detail below.

Subject of assurance

The subject of the assurance is the Selected Sustainability Information presented by Gasum Oy in the Sustainability Report for the reporting period 1 January–31 December 2025 (hereinafter referred to as the "Selected Sustainability Information") in the following respects:

- E1-1: Transition plan for climate change mitigation, presented on pages 28-29
- E1-2: Policies related to climate change mitigation and adaptation, presented on pages 30-31
- E1-3: Action plans and resources in relation to climate change policies and targets, presented on pages 31-32
- E1-4: Targets related to climate change mitigation and adaptation, presented on pages 32-33
- E1-5: Energy consumption and mix, presented on pages 33-34
- E1-6: Gross Scopes 1, 2, 3 and Total GHG emissions, presented on pages 34-37
- ESRS 2 Minimum Disclosure requirements applicable to E1 Policies, Actions, Targets and Metrics, presented on pages 28-37
- E5-1 Policies related to resource use and circular economy, presented on page 38
- E5-2 Actions and resources related to resource use and circular economy, presented on pages 38-39
- E5-3 Targets related to resource use and circular economy, presented on pages 39-40
- E5-4 Resource inflows, presented on page 40
- E5-5 Waste, presented on pages 40-41
- ESRS 2 Minimum Disclosure requirements applicable to E5 Policies, Actions, Targets and Metrics, presented on pages 38-41
- EU Taxonomy Key Performance Indicators for eligible and aligned activities: Turnover, CapEx and OpEx, presented on pages 23-27

Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Selected Sustainability Information for the reporting period 1 January–31 December 2025 has not, in all material respects, been prepared in accordance with the Reporting Criteria defined below.

Basis for conclusion

We performed the assurance of the Selected Sustainability Information as a limited assurance engagement in compliance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised) Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

Our responsibilities under this standard are further described in the Responsibilities of the Assurance Provider section of our report.

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

Other matter

Our opinion does not cover the comparative information that has been presented in the group sustainability statement. Our opinion is not modified in respect of this matter.

Assurance provider's independence and quality management

We are independent of the company in accordance with the ethical requirements that are applicable in Finland and are relevant to our engagement, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We apply International Standard on Quality Management ISQM 1, which requires the audit firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Responsibilities of the Management

The Management of Gasum Oy is responsible for the preparation and presentation of the Selected Sustainability Information in accordance with the reporting criteria, i.e. European Sustainability Reporting Standards (ESRS) and the requirements laid down in Article 8 of the Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (EU Taxonomy) (hereinafter the Criteria). The Management is also responsible for such internal control as it determines is necessary to enable the preparation of Selected Sustainability Information that is free from material misstatement, whether due to fraud or error.

Assurance provider's responsibilities

Our responsibility is to perform the assurance engagement to obtain limited assurance about whether the Selected Sustainability Information is free from any material misstatement due to fraud or error, and to issue a limited assurance report that includes our conclusion.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions that users taken on the basis of the Selected Sustainability Information.

Compliance with the International Standard on Assurance Engagement ISAE 3000 (Revised) requires that we exercise professional judgement and maintain professional skepticism throughout the engagement. We also

- identify and assess the risks of material misstatement in the Selected Sustainability Information, whether due to fraud or error, and obtain an understanding of internal control relevant to the engagement in order to design assurance procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the company's internal control.
- design and perform assurance procedures responsive to those risks to obtain sufficient appropriate evidence to provide a basis for our conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Description of the procedures that have been performed

The procedures performed in a limited assurance engagement differ in nature and timing from, and are less in extent than for, a reasonable assurance engagement. The nature, timing, and extent of the assurance procedures selected depend on professional judgement, including the assessment of risks of material misstatement, whether due to fraud or error. Procedures performed in a limited assurance engagement primarily consist of inquiries and analytical procedures. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would be obtained had a reasonable assurance engagement been performed.

Our procedures included for ex. the following:

- Performed inquiries of the company's management and personnel responsible for collecting and reporting the Selected Sustainability Information contained in the sustainability report at the group level and for subsidiaries.

- Obtained an understanding of the company's sustainability reporting process, internal controls, and information systems related to the Selected Sustainability Information reporting process through inquiries.
- Reviewing internal and external documentation to verify to what extent these documents and data support the information included in the Selected Sustainability Information and evaluating whether the information presented in the Selected Sustainability Information is in line with our overall knowledge of corporate sustainability at Gasum Oy.
- Performing substantive procedures to assess the reasonability of the presented Selected Sustainability Information.
- Evaluated whether the Selected Sustainability Information meets the requirements of the ESRS standards.
- With respect to the EU taxonomy information, we obtained an understanding of the process by which the company has identified taxonomy-eligible and taxonomy-aligned economic activities and assessed the compliance of the related disclosed information with the regulations.

Helsinki, 19 March 2026

Deloitte Oy
Audit Firm

Aleksi Martamo
Authorized Public Accountant (KHT)

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