



Sustainability Report

Gasgrid's sustainability programme focuses on achieving a carbon neutral transmission network by 2035, the personnel's well-being and safety, an ethical corporate culture, and the reliability of gas transmission and security of supply.

The reporting is based on a double materiality assessment drawn up in line with the Corporate Sustainability Reporting Directive (CSRD) and the ESRS reporting standards, as applicable. Separately specified disclosure requirements and data points have been verified in the report.

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ESRS 2 – General disclosures

BP-1 – General basis for preparation of the sustainability statement

The Sustainability Report for 2025 addresses Gasgrid Group's operations, including the parent company Gasgrid Finland Oy and its subsidiaries Floating LNG Terminal Finland Oy and Gasgrid vetyverkot Oy. The name "Gasgrid" used in the report refers to the entire Group, unless otherwise mentioned.

The reporting takes into account the requirements of the government decision-in-principle concerning the state ownership policy and those of the Corporate Sustainability Reporting Directive, CSRD (EU) 2022/2464, to the extent described below. We have used, as applicable, the European Sustainability Reporting Standards (ESRS) in the Appendix of the Commission Delegated Regulation (EU) 2023/2772 as a framework for the report's contents. According to the current assessment, Gasgrid is not obligated to report in compliance with the Corporate Sustainability Reporting Directive, but it has prepared for the entry into force of the directive by drawing up a double materiality assessment in line with the European Sustainability Reporting Standards ESRS 1. We defined which standards to report based on the results of the double materiality assessment, but we selected which disclosure requirements to report based on the Global Reporting Initiative (GRI) indicators that we have reported in previous years.

At the end of the report, there is information that was not identified as material in the double materiality assessment, but we have included it due to the reporting needs of specific stakeholders. These are incidents of corruption and bribery, as well as waste and air emissions. However, we have reported incidents of corruption and bribery in line with the disclosure requirements of section G1-4 of the ESRS G1 standard, as applicable. The corruption and bribery incident information is part of the assurance. The reported disclosure requirements and more detailed data points are compiled in the ESRS index at the end of the Sustainability Report. The scope

of the assurance is also presented in the index table in question. We report environmental and emissions data at the Group level, and they are based on the operational control approach. The reported environmental information is the same information that we reported to the supervisory authorities concerning sites that require environmental permits. Gasgrid's Sustainability Report is part of the consolidated Annual and Sustainability Report, which is published annually.

The scope of consolidation of the Sustainability Report corresponds with the accounting scope of consolidation. The reporting covers all of the companies belonging to the Group and their businesses.

The Sustainability Report covers the key parts of Gasgrid's upstream and downstream value chain, including the origin of gases, suppliers, Gasgrid's own business operations, and the delivery of products and services to customers. The report includes information in accordance with the ESRS 1 standard on the upstream and downstream value chain insofar as it is necessary with regard to material impacts, risks and opportunities. The reporting of information concerning the value chain is based only on the information available internally and publicly in accordance with the transitional provisions defined in the ESRS 1 standard.

BP-2 – Disclosures in relation to specific circumstances

Gasgrid did not exceed the average number of 750 employees during the 2025 financial year. Despite this, Gasgrid has assessed the sustainability topics covered by the ESRS standards E4, S1, S2, S3 and S4 as part of the double materiality assessment. Based on the assessment, we identified the topics E4, S1, S2 and S3 to be material, but of these, we only reported specific information related to S1 in the 2025 Sustainability Report. Excluding the information related to E4, S2 and S3 is based on the application of Appendix C of ESRS 1 (List of phased-in Disclosure Requirements). The required

descriptions for these topics are presented below.

An error was found in Gasgrid's personnel hours in the collection of initial data in previous years' reporting. The error impacts the calculation of the injury frequency per million working hours. Gasgrid's injury frequency for 2024 has been adjusted to the value 7.6 (earlier value 4.2) and Gasgrid's and the suppliers' combined figure has been adjusted to the value 5.3 (earlier value 4.1). Gasgrid's and the suppliers' combined figure for 2023 has been adjusted to the value 3.2 (earlier value 2.5).

ESRS E4 – Biodiversity and ecosystems

Gasgrid acts systematically to avoid and mitigate nature-related impacts caused by its operations as part of the planning, construction and operation of the gas infrastructure. In Gasgrid's operations, in particular in the building of the transmission network, the environmental impacts on the natural surroundings and ecosystems are assessed and accounted for as part of sustainable project development. Material topics are changes in land use and impacts on water bodies, and impacts on ecosystem services and the state of species. Biodiversity is part of our sustainability programme and the objective is to draft a biodiversity transition plan and to develop nature-related impact assessment practices during 2026. These goals are not yet based on scientifically validated biodiversity frameworks, but development work is underway.

Gasgrid's Code of Conduct covers the consideration of biodiversity and ecosystems. Our key principles are pollution prevention, contributing to energy efficiency and the use of renewable energy, as well as complying with environmental obligations throughout the life cycle of our products and services. In addition, our goal is to reduce methane and carbon dioxide emissions in our transmission network through efficient operation. Our activities are steered by the principles of prudence and due diligence, and we expect the same of our supply chain.

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During the reporting year, we carried out an assessment that follows the LEAP process (Locate - Evaluate - Assess - Prepare) developed by the Taskforce on Nature-related Financial Disclosures (TNFD) to identify the impacts, dependencies, risks and opportunities linked to biodiversity. We will continue to draft the biodiversity transition plan based on the assessment. We also developed assessment practices for nature-related impacts, in particular for the planning of the national hydrogen transmission network route, in which we started up environmental impact assessments (EIA) and conducted ecological surveys. Furthermore, we reviewed methods for compensating any harm linked to the construction of the gas transmission pipeline, for instance through ecological offsetting.

We will develop biodiversity metrics over the coming years. Currently, we monitor, for example, the number of ecological surveys conducted in EIAs and how preparations for the transition plan are progressing in accordance with the sustainability programme.

ESRS S2 – Workers in the value chain

The well-being and rights of the value chain's workers play a key role in Gasgrid's sustainability programme. We identified working conditions and employment rights in the supply chain as material topics, including matters related to safety, remuneration and freedom of association. Our goal is to ensure, with the help of the Supplier Code of Conduct and supplier audits, that service and material suppliers follow sustainable practices.

Gasgrid's Code of Conduct and Supplier Code of Conduct require suppliers to operate sustainably, minimise environmental impacts and respect human rights. Due diligence is included in the management system and Code of Conduct, covering the identification, prevention and mitigation of adverse impacts in the supply chain. Audits and supervision are focused in particular on critical suppliers, and the safety principles are extended to cover subcontractors, which are also required to complete safety training. Gasgrid has a zero-tolerance policy for human trafficking, forced labour, child labour and corruption.

In 2025, Gasgrid updated the Supplier Code of Conduct and devised a supplier audit model, and drafted extensive procurement guidelines.

As metrics, we monitor the approval percentage for the Supplier Code of Conduct, the number and scope of supplier audits and the injury frequency of service providers working for Gasgrid. In this way we ensure that the rights and well-being of the service providers' employees are part of Gasgrid's responsible business conduct.

ESRS S3 – Affected communities

The construction and maintenance of the gas transmission pipeline, as well as the planning and future construction of the hydrogen transmission network route, have a diverse impact on local communities, such as landowners and residents. In addition, people living in the vicinity of the LNG terminal are subject to noise impacts, for example. Material topics related to affected communities are the communities' economic, social and cultural rights. The management of impacts and risks related to these is steered by Gasgrid's Code of Conduct, which emphasises respecting human rights and involving stakeholders, and assessing and mitigating the impacts of construction, use and maintenance of gas infrastructure.

In the strategy and sustainability programme, material topics are considered, for example, by setting goals and measures for increasing co-operation with landowners and municipalities, and for mitigating nature-related and climate impacts. Our goal is to build and maintain the gas transmission network in a way that respects landowner rights and habitats.

Measures for managing impacts and risks were the environmental impact assessments, ecological surveys and watercourse surveys initiated in 2025, which were related to the planning of the hydrogen transmission network. In addition, we organised stakeholder events in order to consult with landowners and municipalities.

Our goal is zero environmental incidents during construction and maintenance. We also monitor the number of stakeholder events and the stakeholder satisfaction score. We employ the monitoring results

in developing our activities, so that communities' perspectives and rights are systematically factored into the company's sustainability work.

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

Gasgrid's sustainability management is based on a clear division of responsibility between strategic steering, operational management and the coordination and implementation of sustainability work connecting different business areas. We have integrated sustainability into the company's management structure, and its implementation is supported by the policies, internal processes and reporting practices approved by the Board of Directors.

The sustainability governance model ensures that impacts, risks and opportunities related to sustainability are identified, evaluated and addressed systematically as part of the company's strategic planning and operational activities. We steer the sustainability work on three levels: the Board of Directors and the bodies under it are responsible for strategic steering and monitoring, the CEO and Management Team for operational management, and the sustainability unit, together with the sustainability forum consisting of the company's various businesses, for the practical implementation of sustainability measures.

Internal control and risk management are key components of sustainability management and the setting and monitoring of goals. We have defined clear reporting lines and obligations. The progress of the sustainability work is monitored regularly as part of the company's management processes.

Gasgrid's Board of Directors has five members: the Chair and four other members. The Audit Committee has three members and the Management Team has seven. The Board of Directors, Audit Committee and Management Team do not have employee representation, but employees participate in strategy work and developing the operations in the management forums.

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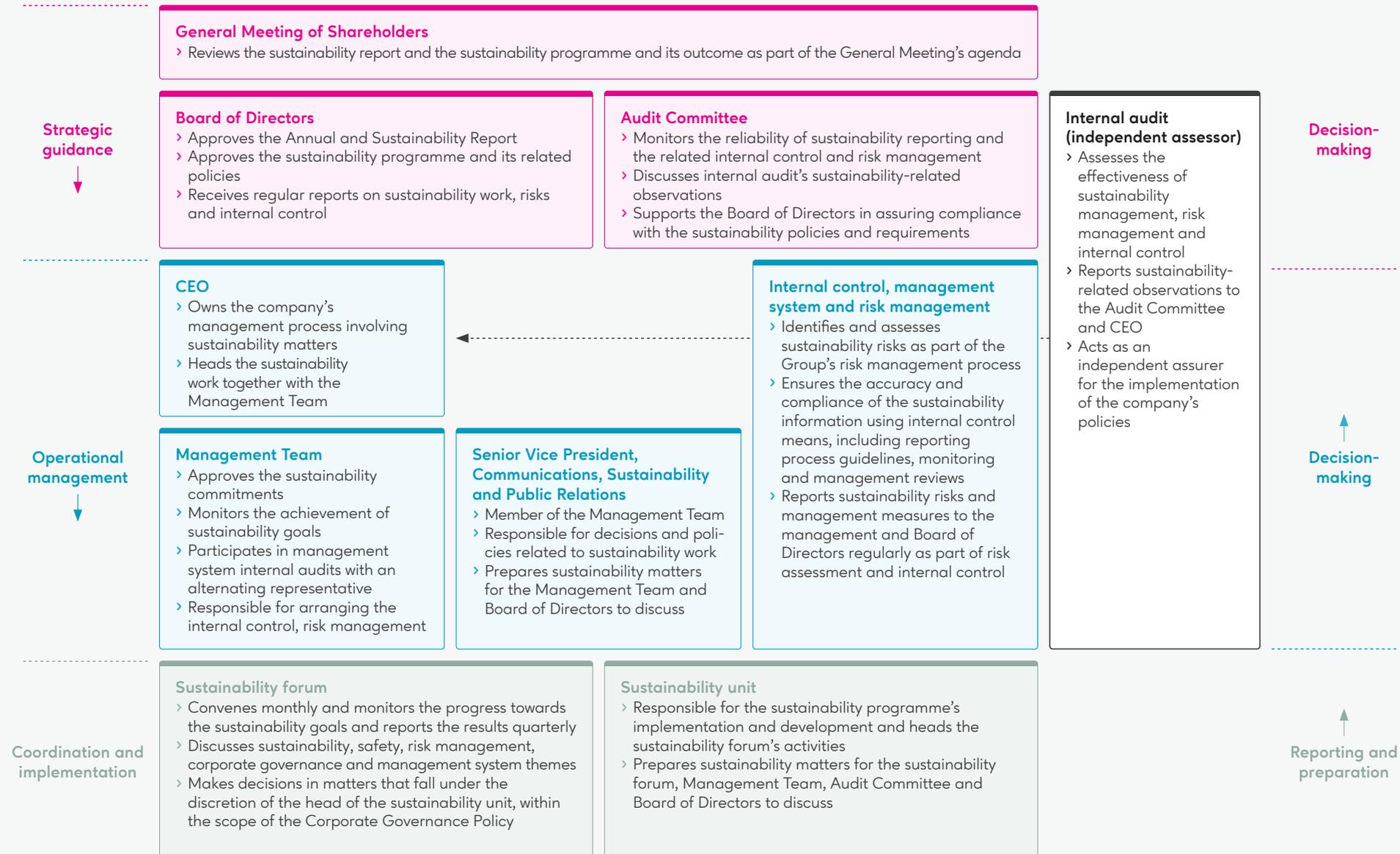
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Gasgrid's sustainability governance model



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The composition of Gasgrid's Board of Directors takes into account experience in gas transmission and the energy sector. The members of the Board of Directors have backgrounds in, for instance, economics, the energy sector and public administration and legal affairs. This ensures that the Board is able to monitor and steer the company's operations effectively in line with its strategic goals. The composition of the Board of Directors emphasises independence and diverse competence from the perspective of Gasgrid's sector, services and geographical operating environment. Members of the Board of Directors must not have any direct or indirect control or considerable controlling influence in companies engaged in the production or supply of natural gas or electricity.

The members of Gasgrid's Management Team consist of the operational executives representing the company's core business areas and support functions. The Management Team includes the CEO, as well as the heads of the Gas Business, Project Execution, Hydrogen Development, LNG business, Finance, and Communications, Sustainability and Public Relations units. This composition guarantees that the Management Team has a comprehensive understanding of the gas transmission infrastructure, energy market and Gasgrid's operating environment. The members of the Management Team take an active role in the implementation of the strategy and operational management. Their expertise covers areas such as energy policy, technological investments, sustainability management and societal engagement.

Gasgrid's CEO is **Olli Sipilä**, who is responsible for the daily management of the company and the implementation of the strategy in accordance with the Board of Directors' instructions. The CEO holds overall responsibility for the company's financial and operational activities and for managing sustainability issues. Sipilä also functions as the chair of the Management Team and is the owner of Gasgrid's management process. His role requires a deep understanding of the gas transmission infrastructure, energy sector regulation and national goals, such as the development of the hydrogen infrastructure.

Gasgrid's Audit Committee consists of three members of the Board of Directors: **Saija Kivinen** (Chair), **Kai-Petteri Purhonen** and **Lauri Kajanoja**. The members of the committee have backgrounds, for instance, in economic policy, as board professionals and in legal affairs. The committee discusses internal control, risk management, and audit plans and reports. The committee's tasks are related to the special characteristics of Gasgrid's sector, which emphasise ensuring financial stability, compliance with strict regulation and managing infrastructure-related risks.

Gasgrid's internal audit is outsourced as an independent function, which reports directly to the Audit Committee and the CEO. In 2025, audits focused on the reporting of EU funding applications and HR's activities supporting the company's growth. Internal audit evaluates the adequacy and effectiveness of the company's management and administrative processes, internal control and risk management.

At the end of 2025, Gasgrid's Board of Directors had five members, of whom two were women and three were men. This corresponds to a gender distribution of 40 per cent women and 60 per cent men. In addition, four of the Board of Directors' members belonged to the over 50 years age group and one to the 30–50 years age group. Diversity is also assessed based on the professional experience of the members. The Board of Directors' composition also takes into consideration the equality targets of the state ownership steering policy.

Gasgrid's Board of Directors is a one-tier body and all (100 per cent) of the Board members were independent of Gasgrid at the time of election.

Tasks, responsibilities and reporting lines of administrative, management and supervisory bodies

Gasgrid's administrative, management and supervisory bodies recognise sustainability competence as a key component of the company's strategic management and implementation of the sustainability programme. The Board of Directors and the Management Team decide on the development of the competence as part of their annual work, and it is supported through both internal and external measures. The Board of Directors

assesses and develops its own practices regularly and reviews its competence needs as part of strategic planning and risk management.

Gasgrid's Board of Directors has good expertise on the impacts of sustainability topics on the company's operations and strategy. The Board of Directors bolsters its competence by participating in state ownership steering training, FIBS corporate responsibility network events and other topical seminars. The Board of Directors also regularly gains information from ownership steering meetings focusing on sustainability viewpoints. Furthermore, the Board of Directors regularly engages with sustainability topics and has approved the company's sustainability programme and its related policies. If needed, the Board of Directors utilises the sustainability expertise of external experts.

The sustainability competence of Gasgrid's Board of Directors and management is directly linked to the company's material impacts, risks and opportunities, which were identified in the double materiality assessment and the company's risk management process. The competences critical for decision-making and monitoring include risks related to climate change, the sustainability of the supply chain, the personnel's well-being and biodiversity.

Sustainability is integrated into Gasgrid's strategic goals, personnel remuneration and a loan tied to the company's key sustainability metrics.

“Sustainability is an integral part of how we manage our operations and pursue our strategic objectives.”

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Responsibilities and supervision and reporting lines of administrative, management and supervisory bodies

Body / role	Roles and responsibilities in the management of impacts, risks and opportunities	Supervision and reporting lines
Board of Directors	<ul style="list-style-type: none"> › Responsible for the company's strategic development and supervises risk management, internal audit and sustainability reporting › Approves the Risk Management Policy and receives regular reports on risks, their development and management measures › Assesses internal audit's and the auditor's plans and the contents and reliability of the Sustainability Report 	<ul style="list-style-type: none"> › Responsible for the company's strategic development and supervises the CEO › Receives reports from the CEO and internal audit
Audit Committee	<ul style="list-style-type: none"> › Supports the Board of Directors especially in overseeing sustainability reporting, internal control and risk management › Discusses internal audit reports and audit plans › Oversees the effectiveness of monitoring systems related to sustainability 	<ul style="list-style-type: none"> › Reports observations to the Board of Directors › Operates under the Board of Directors
CEO	<ul style="list-style-type: none"> › Ensures that the Risk Management Policy is complied with and that risk management and internal control are arranged appropriately › Reports to the Board of Directors on the state of risk management at least biannually › Assesses high-risk situations and the related measures 	<ul style="list-style-type: none"> › Reports to the Board of Directors and Audit Committee › Oversees the Management Team's and units' activities
Management Team	<ul style="list-style-type: none"> › Discusses business risks and opportunities monthly › Responsible for internal control guidance and reporting › Presents policies to the Board of Directors and Audit Committee for approval › Ensures that sustainability-related risks and opportunities are accounted for in strategic and operational management 	<ul style="list-style-type: none"> › Reports to the CEO › Reports to the Board of Directors and Audit Committee
Internal audit	<ul style="list-style-type: none"> › Independent verification function, which assesses the effectiveness of risk management, internal control and corporate governance processes › Ensures that monitoring systems related to sustainability are adequate and effective 	<ul style="list-style-type: none"> › Reports directly to the Audit Committee and CEO › Administratively subordinate to the CEO

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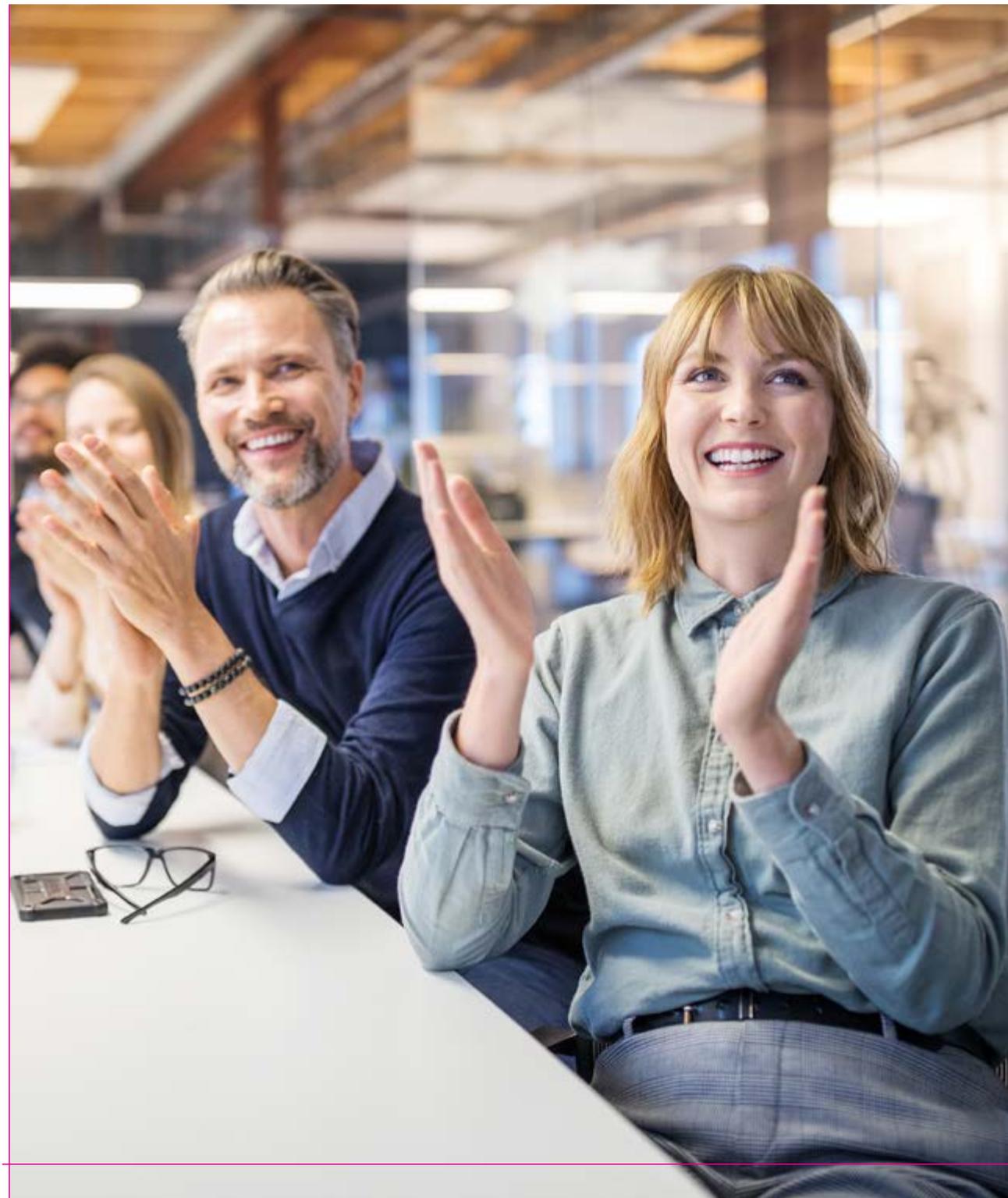
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Policy updates strengthen sustainability management

Our company's policies form a basis for the sustainability, transparency and consistency of our operations. They steer our personnel's decision-making, ensure compliance with regulations and support the company's values in daily activities. Up-to-date policies help build trust among stakeholders and create unified operating models in different business areas. At the end of 2024, we began an extensive assessment of our policies, with the objective of ensuring that they stay up-to-date in a changing operating environment. Experts and personnel from different units participated extensively in the assessment to ensure that different viewpoints were taken into account. We updated the policies based on the assessment results. By editing and updating the policies, we ensure that they meet Gasgrid's current needs. The new updated policies were approved by Gasgrid's Board of Directors on 6 February 2025.

During 2025, we informed our personnel of the new policies and also published the policies that are most relevant to our stakeholders on Gasgrid's website. We created and released a new online course on policies for our entire personnel and made it mandatory annual training for the whole personnel. The new online course helps us ensure that the training covers the company's entire personnel. Our company's continuous commitment to maintaining and developing policies supports sustainable growth and ensures that our operations are based on common principles built on a sustainable foundation.



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

Gasgrid’s administrative, management and supervisory bodies receive regular information on material sustainability topics as part of the company’s management and control processes. Sustainability matters are integrated into strategic management, risk management and internal control. The Board of Directors, CEO and Management Team discuss sustainability matters as part of strategic planning, risk management and reporting.

The CEO presents the risk management and sustainability programme results to the Board every six months. The Management Team discusses business risks on a monthly basis, which includes the handling of sustainability risks, if needed. The Management Team presents the policies to the Board of Directors and the Audit Committee. Internal audit reports its sustainability and other findings on each area being audited to the Board of Directors and the CEO, in accordance with the audit plan. In addition, the financial unit reports each month on the financial results and business risks to the Management Team and the Board of Directors. All of the teams are obligated to identify risks related to business and sustainability and to report them in the company’s risk management register. We also report realised risks.

The Board of Directors accounts for impacts, risks and opportunities in relation to the strategy, major investments and the risk management process. The company may take controlled risks in the case of financial impacts, for example in product development investments or developing new businesses. Gasgrid has a goal of causing zero deaths and irreversible environmental damage, and risks of this kind must be avoided in line with the Risk Management Policy. ESG themes concerning the environment, social responsibility and good governance are included in the Risk Management Policy and sustainability programme,

which steer decision-making. The Management Team discusses risk management results and the CEO reports on them to the Board of Directors at least twice a year.

The administrative, management and supervisory bodies discussed the following material sustainability topics during the reporting period:

- › the results of the double materiality assessment,
- › methane emission mitigation measures and climate risks,
- › corporate security reports,
- › the results of the personnel survey,
- › the achievement of the sustainability targets and their metrics,
- › approval of the sustainability programme,
- › strategic investments and their sustainability aspects,
- › monitoring metrics linked to the sustainability loan (supply interruptions, injuries and direct greenhouse gas emissions)
- › the results of internal and external audits and development measures as part of the management’s review of the management system,
- › sustainability themes that were brought up in sustainability forums and surveys.

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

The goal of the remuneration scheme is to commit key personnel to achieving the company’s strategic goals and sustainability targets. Remuneration at Gasgrid is also intended to incentivise personnel to enhance their competence and drive the company’s overall development. The programme consists of strategic target themes and their related metrics. Gasgrid’s remuneration scheme consists of a fixed monthly salary and variable remuneration, which is divided into short-term incentives (STI) and long-term incentives (LTI). The short-term incentive scheme covers the entire personnel, the Management Team and the CEO. The long-term incentive scheme covers the CEO, the Management Team and separately designated key

personnel, and it always lasts three years. In addition, a one-time bonus model for exceptional performance and a personnel fund into which personnel can fund their bonuses are in use.

Gasgrid assesses performance in relation to several sustainability targets, which are included in both the short-term and long-term incentive schemes. In the short-term incentive scheme, two thirds of all of the common targets consist of sustainability themes, which are safety and stakeholder satisfaction. Each sustainability theme is given a target level, and the size of the bonus is determined based on the achievement of these targets. In the long-term incentive scheme, in the period 2025–2027, sustainability makes up half of the bonus, and it is measured using the sustainability scores given by stakeholders.

The remuneration metrics do not include separate climate targets, nor is the performance of the climate targets assessed against the greenhouse gas emission reduction targets reported under Disclosure Requirement E1-4. Climate targets are, however, part of the company’s sustainability programme and its monitoring.

The Board of Directors defines the metrics and target levels at the start of the earning period. Gasgrid’s Annual General Meeting decides on the bonuses and benefits each year. The Board of Directors decides on the basis for the remuneration, benefits and performance bonus schemes for the CEO and Management Team. The Board of Directors also annually approves the earning criteria of the short-term and long-term incentive schemes and assesses their outcomes at the end of the earning period.

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GOV-4 – Statement on due diligence

Gasgrid’s due diligence is defined as a targeted assessment and deviation management process, the assessment criteria of which consist of Gasgrid’s policies and values, and official regulations and laws that steer operations. The due diligence practices are based on the OECD Due Diligence for Responsible Business Conduct guidelines. The following table illustrates how our sustainability reporting accounts for the key aspects and stages of the due diligence process that we apply.

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

The risk management and internal control processes that support Gasgrid’s sustainability reporting are part of the company’s overall management system. They ensure that sustainability reporting is reliable, up-to-date and based on material impacts, risks and opportunities.

Risk management and internal control cover the whole of Gasgrid Group and all of its functions, including the processes related to sustainability reporting. Risk management is integrated into strategic planning, operational management and day-to-day decision-making. Internal control supports the accuracy of sustainability reporting and covers, among other things, reporting process guidelines, ensuring the accuracy of information and defining reporting responsibilities.

Internal control is divided into three areas:

- › preventive control: the policies and goals guiding the operations,
- › day-to-day operational control: guidelines, systems and designated persons,
- › ex-post control: management assessments, internal and external audits and inspections.

Gasgrid uses a systematic risk assessment model in which risks are assessed based on their impact and likelihood. A risk’s priority determines its treatment responsibility within the organisation and its visibility

Core elements of the due diligence process

Sections in the Sustainability Report

Due diligence elements and reference to the Sustainability Report	
Embedding due diligence in governance, strategy and business model	GOV-1: Sustainability governance model GOV-5: Risk management and internal control SBM-1: Strategy and business model
Engaging with affected stakeholders in all key steps of the due diligence	SBM-2: Interests and views of stakeholders S1-2: Processes for engaging with own workers and workers’ representatives about impacts BP-2: Disclosures in relation to specific circumstances
Identifying and assessing adverse impacts	IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model E1: Impacts, risks and opportunities related to climate change S1: Impacts, risks and opportunities related to own workforce GOV-5: Risk management and internal controls over sustainability reporting
Taking actions to address those adverse impacts	E1-3: Actions and resources in relation to climate change policies S1-4: Tracking and assessing effectiveness BP-2: Disclosures in relation to specific circumstances
Tracking the effectiveness of these efforts and communicating	E1-3: Actions and resources in relation to climate change policies S1-4: Tracking and assessing effectiveness BP-2: Disclosures in relation to specific circumstances

in reporting. We have assessed the risks linked to sustainability reporting as part of regular risk reviews and risks are reassessed annually in accordance with the Risk Management Policy.

The key risks related to sustainability reporting are:

- › the accuracy and coverage of the reporting data,
- › compliance with regulatory requirements,
- › the reliability of the monitoring of sustainability metrics.

These risks are managed through, for instance:

- › the sustainability programme’s metrics and monitoring,
- › regular treatment by the sustainability forum,
- › internal audits and inspections of the certified management system (ISO 9001, ISO 14001, ISO 45001, ETJ+),
- › the sustainability reporting process’s documentation and guidelines.

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The Management Team discusses the material risk management and internal control findings, which we take into account in annual planning and reporting. The sustainability unit and sustainability forum monitor the achievement of the sustainability targets and identify risks related to reporting.

The CEO reports on sustainability-reporting-related risks that are emerging as material and internal control findings to the Board of Directors.

SBM-1 – Strategy, business model and value chain

Strategy and business model

Gasgrid's strategy for 2024–2026 supports the transition towards a carbon-neutral society and addresses the main sustainability topics: climate change mitigation, ensuring security of supply and reliable gas transmission, sustainable business conduct and the well-being and competence of personnel. The strategy is also based on the values created by the personnel, which steer change and support social responsibility.

The strategy is steered by the operating environment's megatrends, such as accelerating climate change and the EU's tightening emission reduction targets, geopolitical uncertainty and the energy market transformation, the rapid development of digitalisation and the growing energy demand. We respond to these challenges by building a multi-gas platform and developing an open hydrogen market and national hydrogen transmission infrastructure, which will connect to European projects. Furthermore, we promote regional hydrogen ecosystems and collaborate with various operators so that low-carbon energy systems develop side by side.

The implementation of the strategy is supported by the sustainability programme, through which we also take into account other material topics, such as developing the personnel's well-being and competence, the transparency of governance, safety, as well as reliable gas transmission and security of supply. This way we ensure that environmental and social



responsibility and good governance are reflected in daily decision-making.

Gasgrid's business model is based on the management and development of the gas infrastructure, enabling market activities and creating the foundation for a hydrogen economy. Gasgrid functions as the transmission system operator (TSO) in the value chain, connecting energy production and consumption, ensuring reliable gas transmission and supporting the green transition. The operations are based on four separate units:

Gas Business offers a safe and reliable gas transmission platform for industry, the energy sector and household needs. LNG terminals, biogas plants and the Balticconnector offshore pipeline, which enables the transmission of gas between Finland and the Baltic counties, are connected to the transmission network. In addition, Gasgrid offers market services, such as enabling trading, guarantee of origin services and data exchange services, which ensure the markets' transparency and imbalance settlement.

LNG terminal operations ensure the reception, storage, regasification and injection of liquified natural gas into the transmission network. The LNG terminal supports reliable gas transmission and access to energy, especially from the security of supply perspective.

Hydrogen Development focuses on an open hydrogen market and developing a national hydrogen transmission infrastructure. Gasgrid promotes the creation of a hydrogen economy and investments in collaboration with stakeholders, which bolsters Finland's energy self-sufficiency and competitiveness, and supports the EU's climate goals.

Project Execution is responsible for planning and executing Gasgrid's infrastructure investments and for the related permits, land use and stakeholder co-operation. The function ensures safe and sustainable development and supports the construction of a hydrogen and methane network.

Value chain

Gasgrid's value chain begins upstream, where natural gas and biogas are produced. These are imported to Finland either through the Balticconnector pipeline as gas, through the Inkoo and Hamina LNG terminals as liquified natural gas in carriers, or injected from Finnish biogas plants directly into the transmission network. In the future, the value chain will include an increasing proportion of renewable and low-carbon gases, such as hydrogen and e-methane. Gasgrid's own activities cover the management of gas transmission capacity, operation, maintenance and expansion of the transmission network, Inkoo's LNG terminal services and gas market services, which support the functioning of the gas market. In addition, Gasgrid develops hydrogen infrastructure and market areas to meet future needs. In the downstream value chain, gas transfers to the end-user from the transmission network or through distribution networks, for example to industrial plants and energy companies. Gasgrid's role is to ensure reliable gas transmission and offer an infrastructure that connects gas production and end use.

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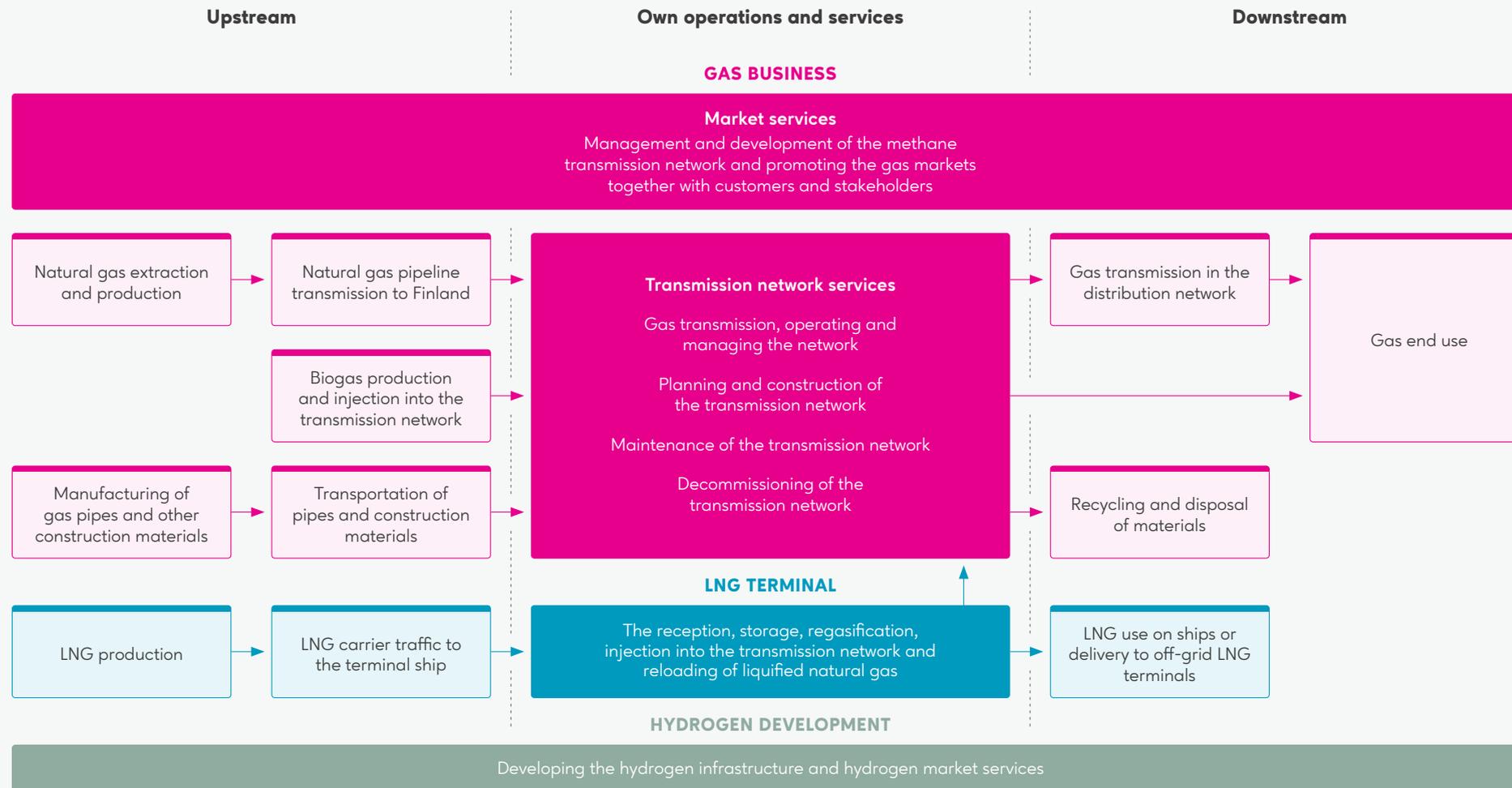
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Customers and parties:

Gas Business

Parties injecting biogas into the network, foreign TSOs, shippers, traders, guarantee of origin operators, LNG terminal

LNG terminal

LNG suppliers, LNG carriers, terminal ship, off-grid terminals

Hydrogen Development

Project developers, hydrogen producers, regions, municipalities, authorities, consortium partners, landowners

Customers and parties:

Gas Business

Industrial customers, energy companies, transmission network customers, distribution system operators, market participants, municipalities, authorities, landowners

LNG terminal

LNG carriers, terminal ship, off-grid terminals

Hydrogen Development

Project developers, hydrogen users, regions, municipalities, authorities, consortium partners, landowners

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Significant service groups, markets and customer groups

Gasgrid's significant service groups consist of gas transmission infrastructure operations and development, LNG terminal services, guarantee of origin services and the development of hydrogen economy infrastructure and markets. The gas transmission platform includes, among other things, the Balticconnector offshore pipeline and infrastructure that enables gas transmission from the Inkoo and Hamina LNG terminals connected to the network. In addition, five biogas plants, which produce gas that is transmitted to customers through Gasgrid's transmission network, are connected to Gasgrid's network. Furthermore, Gasgrid offers guarantee of origin services that enable more transparent reporting on the origin of renewable gases.

With regard to the hydrogen economy, Gasgrid promotes regional hydrogen development and the national infrastructure that supports it. At the same time, Gasgrid also promotes Baltic Sea region collaboration through three international EU projects. In 2025, Gasgrid launched environmental impact assessments (EIA) connected to the planning and implementation of the national hydrogen infrastructure, which are a core part of sustainable infrastructure planning and construction. Gasgrid deepened its co-operation to promote the hydrogen economy in regional hydrogen development and international hydrogen project development work.

Gasgrid's most significant geographical market areas are Finland's gas market and the Baltic region energy market. Customer groups include industrial customers, energy companies, LNG terminal users, biogas producers, hydrogen economy operators, and authorities and financiers. As the transmission system operator, Gasgrid does not operate under a conventional customer-supplier relationship with all of the parties; instead, many of these operators are market parties whose mutual trade and technical interoperability Gasgrid enables and supervises as the transmission network operator. Moreover, the LNG terminal in Inkoo operates as part of Finland's and the

Baltics' energy market, which bolsters Gasgrid's position as a regional energy operator. The company complies with Finnish and EU legislation and global sanctions. For example, we have accounted for the Russia-related restrictions in the company's operations, and Gasgrid does not do business with parties subject to sanctions.

Role in the gas transmission sector

Gasgrid operates in the gas transmission sector and derives revenues from fossil fuel-related activities, especially natural gas transmission and liquefied natural gas (LNG) terminal services (EUR 102.5 million). These operations fall under the transmission and storage of fossil fuels as specified in EU Regulation 2018/1999, article 2, section 62. However, Gasgrid does not participate in fossil fuel exploration, manufacturing or processing; its role is instead restricted to maintaining and operating the transmission infrastructure. In addition, the company actively develops its capabilities to enable renewable and low-carbon gases and the hydrogen economy, and the goal is to increase the entry volume of renewable gases into the transmission network.

Priorities of the sustainability programme in the business areas

Gasgrid's sustainability programme for 2025–2026 sets clear goals for different business areas and stakeholders. The company's objective is a carbon-neutral gas transmission network by 2035. Gas transmission operations are focused on Finland, and the development of the transmission network takes into account regional security of supply needs.

By developing the guarantee of origin system, we support the growth and transparency of the renewable gas market. The goal in our customer work is 100 per cent reliable transmission of gas and an initial response time of three days to customer contacts. We measure customer satisfaction using the Net Promoter Score (NPS), which describes stakeholders' willingness to recommend us, and stakeholder satisfaction through the Trust&Reputation survey. We also measure customer satisfaction more closely in the gas and LNG

businesses. Gasgrid has updated its Supplier Code of Conduct for its service and material suppliers. We also created an audit model for suppliers and developed procurement guidelines extensively.

In hydrogen infrastructure development, in tasks aligned with the sustainability programme, we began EIAs and ecological surveys along the planned pipeline route. In addition, we are reviewing an operating model for compensating harm resulting from construction, which takes harm to biodiversity into account.

SBM-2 – Interests and views of stakeholders

Gasgrid develops its operations and sustainability work extensively with internal and external stakeholders through active dialogue, among other things. In its stakeholder co-operation, the goal is also to provide information on the opportunities offered by renewable and low-carbon gases and the hydrogen economy in Finland. Gasgrid's goal is active and open interaction with its stakeholders. Several communication and feedback channels are available to support this, which are presented in the following table.

We take into account stakeholders' views in strategy work, in the preparation of the sustainability programme, and when planning projects and communications. According to the Trust&Reputation survey, stakeholders consider Gasgrid to be a very sustainable company and they have given positive feedback on co-operation. The table shows in more detail, by stakeholder, how Gasgrid takes into account stakeholders' views and how they impact the strategy and business model.

Gasgrid's Board of Directors is regularly updated on the views of stakeholders as part of its monitoring of the sustainability programme and strategy. In 2025, the Board of Directors discussed the sustainability programme's outcomes and approved the new programme, which was prepared with the help of stakeholder materials. The CEO and Management Team are responsible for arranging stakeholder engagement and for reporting outcomes to the Board of Directors.

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Stakeholders ¹⁾		Co-operation and engagement channels ²⁾	Material topics for stakeholders	Consideration of stakeholder views ³⁾
Core stakeholders	Gasgrid's personnel	Personnel surveys, info sessions, intranet, managerial work, training, personnel and culture forum	Occupational safety and reliable gas transmission, occupational well-being, competence, equality, change management, internal communications	Personnel feedback and surveys steer development measures, such as managerial work, the implementation of changes and improving internal communications. The views directly impact the planning and execution of programmes supporting occupational well-being and competence.
	Owner	Ownership steering, General Meeting of Shareholders, working groups, direct discussions, ownership steering's sustainability network	All ESG sub-topics, including climate change mitigation, social responsibility and transparent governance	The owner's views steer the strategic direction through the principles of ownership steering and the Corporate Governance Policy. These views are used to define and monitor the goals of the sustainability programme.
	Customers	Customer service, control room collaboration, market forums, NPS surveys on stakeholders' willingness to recommend the company, consultations	Reliable gas transmission, equal treatment, reduction of methane emissions, transmission pricing	Customer feedback and the NPS results concerning stakeholders' recommendation willingness guide the development of the services and management of gas transmission reliability. The views also impact the planning and emission reduction targets of the hydrogen transmission network.
	Authorities	Permit supervision, reporting in compliance with permits, inspections, co-operation meetings	Safety, reliability of gas transmission, personnel's competence and actions in exceptional situations	Demands and feedback from authorities steer safety management and competence development, which is reflected in the strategic focus on safety and competence.
	Legislators	Requests for statement, working groups, expert consultations	Climate change mitigation, workers' rights in the value chain, reliability of gas transmission	Legislators' views are considered through influencer communications and the sustainability programme, which impacts strategic choices, especially in terms of climate and social responsibility issues.
	Political and social influencers	Requests for statement, working groups, meetings	Climate change mitigation, workers' rights, reliability of gas transmission and security of supply	The views are considered in strategic and influencer communications, which supports the social acceptability of the sustainability programme's goals.
	Financiers	Financing negotiations, co-operation meetings, sustainability reporting on financing metrics	Low-carbon gas transmission, reliability of gas transmission, ethics	Financiers' expectations steer the contents of sustainability reporting and the terms of sustainability loans. The views impact the specification of metrics and the definition of sustainability goals.
	Landowners and neighbours	Resident evenings, notifications, project bulletins, EIAs	Reliability, safety of own operations in the vicinity of a gas pipeline, disturbance-free operations that cause no harm, consulting local communities and taking views into consideration in projects	Local communities' views are accounted for through involvement and safety campaigns, which impacts the projects' planning and communications.
	Energy producers and users	Forums, market surveys and reviews, co-operation and planning meetings	Climate change mitigation, reliability of gas transmission, gas pipeline connection services	The views steer the development of the entry capacity of renewable and low-carbon gases and the hydrogen pipeline, which impacts the business model's solutions.

¹⁾ Who are Gasgrid's key stakeholders?

²⁾ Is there interaction with the stakeholder and how is it arranged?

³⁾ How Gasgrid takes into account stakeholders' views and how they impact the strategy.

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Stakeholders ¹⁾		Co-operation and engagement channels ²⁾	Material topics for stakeholders	Consideration of stakeholder views ³⁾
Other stakeholders	Service and material suppliers	Meetings, information systems, online training, audits	Fairness and reliability of operations and competitive bidding, anti-corruption, risk management	Partners' views are heard in audits and competitive bidding takes place fairly.
	Environmental and non-governmental organisations	Webinars, surveys, resident evenings	Biodiversity, consideration of the local environment and communities, ethics, disturbance-free operations	Organisations' views impact the strategic environmental goals and sustainability programme through ecological surveys and inclusion.
	Projects in the infrastructure influence area	On-site pipeline location guidance, statements and permits, control room co-operation, planning meetings	Safe construction, competence, gas pipeline geographic information and location guidance services, and restrictions caused by the gas pipeline to the planning of infrastructure projects	The views of project parties are accounted for in developing the geographic information system and safety services, which supports strategic co-operation and risk management.
	Partners	Webinars, newsletters, meetings	Reliability, reliability of gas transmission, climate change mitigation	The views of partners impact projects' sustainability goals and joint development projects, which support the strategic partnership.
	Media (the public)	Media releases, interviews and meetings	Non-discrimination, anti-corruption, reliability, producing gas information	Views gained from the media steer the communications strategy and sustainability communications, which strengthens transparency and stakeholder trust.
	Potential employees	Recruitment channels, events, communication through websites and social media	Working conditions, competence, equality	Employer image development and training paths are planned based on feedback, which impacts the need for experts and the personnel strategy.

¹⁾ Who are Gasgrid's key stakeholders?

²⁾ Is there interaction with the stakeholder and how is it arranged?

³⁾ How Gasgrid takes into account stakeholders' views and how they impact the strategy.

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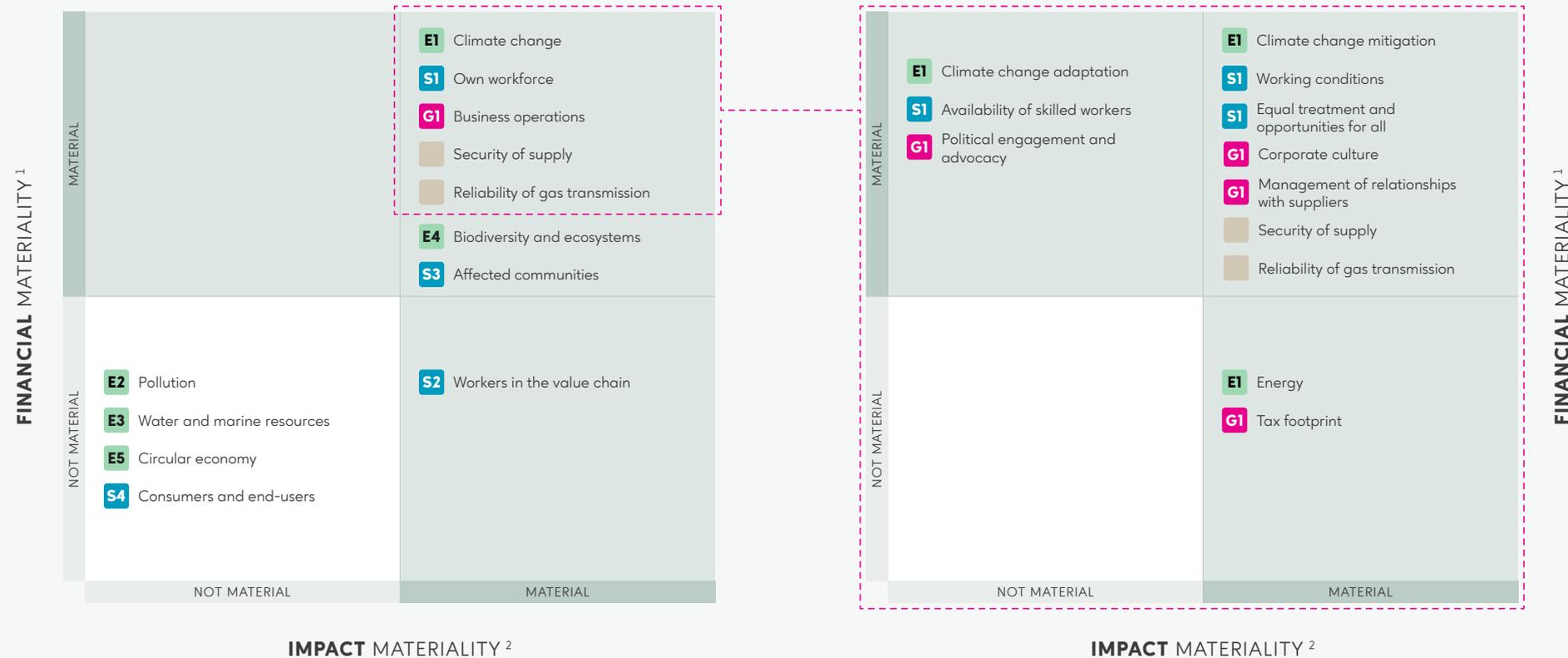
SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The material impacts, risks and opportunities of Gasgrid’s operations are tied to the company’s strategy and business model. Based on the double

materiality assessment, in 2025 we focused our reporting on climate change (E1), own workforce (S1), business conduct (G1), and entity-specific material topics outside the ESRS standards, i.e. security of supply and reliability of gas transmission. This section provides summarised descriptions of the negative and

positive impacts, risks and opportunities identified for each sub-area. We have reported the impacts, risks and opportunities in more detail under the topical standards.

Gasgrid’s material sustainability topics on the left and sub-topics reported in 2025 on the right.



¹ How external sustainability factors have a positive and/or negative impact on the company’s ability to create value.

² How the company impacts people and the environment positively and/or negatively.

E ENVIRONMENT S SOCIAL G GOVERNANCE Entity-SPECIFIC TOPIC

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E1 – Impacts, risks and opportunities related to climate change

Gasgrid's business operations are based on managing gas infrastructure. Gas transmission operations use mainly fossil natural gas or LNG, which causes the most significant negative climate impacts. Methane and carbon dioxide emissions result from compressor stations, fugitive emissions from the transmission network and the LNG terminal's energy use. Methane is a powerful greenhouse gas, and its emissions directly impact the acceleration of climate change.

Gasgrid's goal is a 60 per cent reduction in Scope 1–2 GHG emissions in the transmission network by 2030 and carbon neutrality by 2035. The company implements technical solutions for preventing methane emissions and reducing fugitive emissions, and promotes the use of renewable gases, such as biogas and, in the future, e-methane, in its operations. In addition, Gasgrid enables its customers to switch over to low-carbon solutions, such as biogas and hydrogen, which supports the energy system's transition and reduces value chain emissions.

Key risks are related to tightening climate policy and regulation, which increase transition risks and costs and require investments in adapting infrastructure. The rise in the price of emission rights and requirements concerning methane emissions can increase costs and reduce the profitability of the LNG terminals and transmission business. Moreover, market and regulatory uncertainty can delay investments, and the development of technology for the hydrogen economy creates uncertainty and cost pressures. As a physical risk, an exceptionally warm winter period can reduce the demand for gas and lead to the underutilisation of the LNG terminal.

At the same time, the transition opens up significant opportunities: the infrastructure for renewable and low-carbon gases and the hydrogen economy offers a strategic position as the green transition moves forward. The LNG terminal's ship solution offers flexibility and enables rapid reactions to market and regulatory

changes. The growing demand for renewable gases attracts sustainability-focused investments.

More detailed information on the material impacts, risks and opportunities related to climate change are presented in the topic-specific section.

S1 – Impacts, risks and opportunities related to own workforce

Gasgrid's impacts affecting personnel are related to working conditions, safety, competence and non-discrimination. Negative impacts arise through health and safety risks, such as the risk of cave-ins in connection work, exposure to gas in the event of leakage risk, slipping, traffic accidents and commuting accidents, which can lead to absences and weaken work capacity. In addition, organisational changes and fast growth can increase stress and make it difficult to carry out orientation and competence development fairly.

Positive impacts result from investing in occupational health, safety training and an inclusive work culture. Gasgrid offers comprehensive occupational safety, first-aid fire extinguishing and first-aid training, and ensures that everyone working in the gas infrastructure process area has an occupational safety card. The company promotes non-discrimination and equality through pay transparency and regular pay surveys, and ensures equal opportunities for developing competence in an increasingly international work community. Working conditions are developed actively in dialogue with the personnel through the personnel and culture forum, for instance.

A key risk is related to the availability of skilled workers, especially as hydrogen economy projects move forward. This risk can cause a skills gap, increase recruitment costs and slow down the progress of strategic projects.

Opportunities are created when efforts to develop competence, leadership capabilities and occupational well-being strengthen the employer image, increase commitment and support long-term growth.

More detailed information on the material impacts, risks and opportunities related to own workforce are presented in the topic-specific section.

G1 – Impacts, risks and opportunities related to business conduct

Gasgrid's corporate culture and governance are based on sustainability, transparency and the ethical principles specified in the Code of Conduct. Gasgrid's sustainable approach strengthens the personnel's commitment, increases stakeholder trust and improves financing opportunities, such as the availability of sustainability loans. Furthermore, the company's tax footprint supports society's basic functions and strengthens the company's social responsibility and transparency. The corporate culture steers activities in accordance with values and principles and is integrated into the management system and remuneration through concrete metrics such as occupational safety, reliable gas transmission and stakeholders' willingness to recommend Gasgrid (NPS).

Negative impacts can arise if sustainability targets are not met or communication related to the environment, social responsibility and good governance is lacking, which can weaken the availability of financing and the company's reputation. In addition, shortcomings in the transparency of the supply chain can cause reputation and sustainability risks. Gasgrid requires its suppliers to comply with the Supplier Code of Conduct, which includes a commitment to respecting human rights, environmental responsibility, anti-corruption activities and safety practices, as well as reporting sustainability information.

The risks are related to political uncertainty and regulatory changes, which can delay investments and weaken the predictability of the business environment. Opportunities arise from active political engagement and advocacy, which can promote the creation of a favourable regulatory and investment environment and support the position of renewable and low-carbon gases and the hydrogen economy as part of the green transition.

More detailed information on the material impacts, risks and opportunities related to business conduct are presented in the topic-specific section.

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Entity-specific topics – Impacts, risks and opportunities related to security of supply and reliability of gas transmission

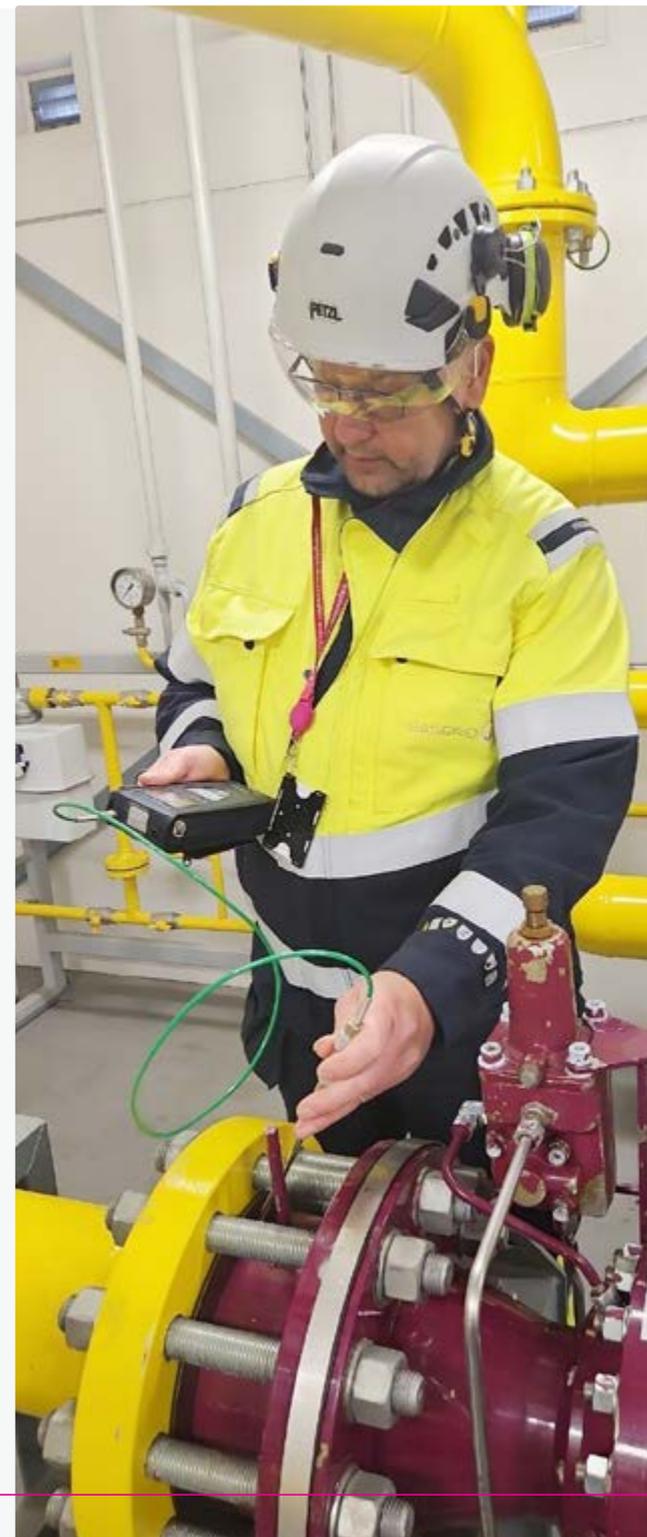
Gasgrid's business model focuses on gas transmission, and the company plays a central role in ensuring the security of supply and gas transmission reliability of Finland's energy system. Gasgrid ensures that gas energy is supplied to customers in a timely manner and at the right pressure level, which supports the continuity of industry, households, and electricity and heat production. The impacts originate in the company's own activities and affect the functioning of society and the smooth functioning of people's daily lives. Gasgrid's role as the transmission system operator and an influential party through its business relationships is material for the realisation of reliable gas transmission throughout the energy chain. Gasgrid is not responsible for the procurement of gas or distribution to consumers, but ensures in advance the proper functioning of the transmission system in accordance with market rules.

Positive impacts arise from Gasgrid's activities ensuring the functioning of Finland's gas transmission system. The reliability of gas transmission is based on the skilled maintenance, supervision and operation of the transmission system. In 2025, the reliability of gas transmission was 100 per cent, without a single unplanned supply interruption. Reliable gas transmission is the key strength and competitive advantage of Gasgrid's business, ensuring a steady revenue stream and the maintenance of customer relationships. Moreover, Gasgrid plays a key role in ensuring security of supply in emergency conditions. The company's contingency planning covers disturbances and emergency conditions as stipulated in the Emergency Powers Act, and it includes the storage of spare parts, maintaining reserve capacity, and emergency drills. The Inkoo LNG terminal and Balticconnector pipeline function as parallel import routes, strengthening the reliability of gas transmission and security of supply especially in disturbance scenarios.

Opportunities arise because reliable gas transmission and security of supply are the key strengths and competitive advantages of Gasgrid's business operations. They support the maintenance of customer relationships, the stability of the energy system and the continuity of society's critical functions also in emergency conditions. This position boosts Gasgrid's reliability and role in the national energy system, which can enable long-term co-operation, investments and financing as an operator vital for security of supply.

More detailed information on the material impacts, risks and opportunities related to security of supply and the reliability of gas transmission are presented in the topic-specific section.

“We have identified the impacts, risks, and opportunities related to material sustainability themes.”



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

The assessment of Gasgrid's impacts, risks and opportunities is part of the company's overall risk management system. As specified in the Risk Management Policy, we have integrated risk assessment and governance into daily decision-making at all levels of the organisation. In 2024, to prepare for the requirements of the Corporate Sustainability Reporting Directive, we carried out, for the first time, a double materiality assessment in line with the ESRS 1 standard together with a partner. In 2025, we specified material topics in internal workshops together with designated persons.

In the assessment, we identified sustainability topics, which are material either from the impact or financial magnitude aspects, or both. These are E1, S1, S2, S3, E4 and G1. Furthermore, we identified security of supply and reliable gas transmission as entity-specific material topics outside the standards. In 2025, the sustainability assessment specification focused on the topics E1, S1 and G1, as well as on security of supply and the reliability of gas transmission, which we have reported on as applicable in the 2025 Sustainability Report. The exclusion of the information related to E4, S2 and S3 is based on the application of Appendix C of ESRS 1 (List of phased-in Disclosure Requirements).

We started up an assessment process for mapping potential material impacts, risks and opportunities. We utilised earlier materiality assessments as the initial data for the assessment and supplemented the data with the assistance of internal and external stakeholders and information sources, such as the sector-specific materiality assessments of MSCI and SASB, and using the UN's and energy authorities' reviews of the sustainability impacts and risks of the gas and hydrogen industries.

The assessment covers the key parts of Gasgrid's upstream and downstream value chain, including the origin of gases, suppliers, Gasgrid's own business operations and the delivery of products and services to customers. We focused in particular on climate

change, the reliability of gas transmission, methane emissions, the availability of skilled workforce and the sustainability of the supply chain. The material impacts, risks and opportunities related to business conduct take into account that Gasgrid's business is mainly located in Finland, that the gas transmission is regulated and monitored, and that the business operations are subject to significant expectations related to transparency and ethics. For the double materiality assessment, we identified key stakeholders that are exposed to identified or potential impacts from Gasgrid, or which have sustainability-related expectations and demands towards Gasgrid, or which impact Gasgrid's opportunities to succeed and develop its business sustainably. From among external stakeholders, we identified customers, service and material suppliers, partners, financiers and the owner as key stakeholders. Of the internal stakeholders, we identified the financial, HR, safety and sustainability units' and businesses' representatives as key stakeholders.

We collected the stakeholders' views as part of the double materiality assessment and the preparation of the sustainability programme by conducting six interviews with internal stakeholders and five with external stakeholders. The representatives of the external stakeholders were a financier, a supervisory authority, a customer, a service provider and a strategic partner. In addition, we utilised the expertise of an external consultant in the double materiality assessment.

We carried out the double materiality assessment from two perspectives: impact materiality and financial materiality. In both assessments, we used an assessment scale of 1–6 and defined materiality based on predetermined limit values. We assessed the materiality of impacts based on four dimensions:

- › the scale (how severe or beneficial the impact is)
- › the scope (how widespread the impact is)
- › irremediability (to what extent a negative impact can be remediated)
- › likelihood (only potential impacts)

We assessed the actual impacts based on the first three dimensions, while we also considered the likelihood of the potential impacts. We assessed negative impacts to be material if one of the three dimensions received the value 5 or 6, or if they totalled at least 12 and the likelihood was high. We used scale and scope in the positive impacts and determined the materiality using similar logic.

We assessed the financial materiality risk or opportunity based on likelihood and financial magnitude, either in euros (e.g. EUR 10,000 – EUR 100 million) or qualitatively (e.g. “small” – “huge”). We defined the materiality of financial risks and opportunities as the product of multiplying the likelihood by the magnitude: if the result is at least 20, we assessed the risk or opportunity in question to be material.

We considered a sustainability topic to be material if it met either the impact or financial materiality criteria, or both. We approved the scope and limits together with the sustainability team and the representatives of the key businesses. We validated the results of the double materiality assessment in two workshops. Members of the sustainability forum, representing all of the business and support functions, took part in the workshops. We took all of the validated results to the management workshop for approval in 2024 and reported on them to the company's Board of Directors in 2025. We updated the double materiality assessment in the autumn 2025 in separate workshops with each responsible business and support function. The Management Team approved the updated results in autumn 2025.

The results of the double materiality assessment are presented in a matrix with impact materiality and financial materiality as its two axes. The position of each sub-topic in the matrix is based on a weighted average, which accounts for both the quantity and significance of the impacts, risks and opportunities. This ensures that the matrix provides a comprehensive picture of the materiality of each sub-topic in Gasgrid's operations.

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Climate change

We have identified in our operations several significant impacts, risks and opportunities related to climate change mitigation, energy use and climate change adaptation. These aspects are directly connected to the company’s infrastructure, operational activities and strategic goals. Key negative impacts on climate change mitigation are caused by methane and carbon dioxide emissions, which arise from compressor stations, fugitive emissions from transmission pipelines and the

LNG terminal’s operations. Gasgrid is committed to the prevention of methane emissions and the reduction of fugitive emissions through technical means, and the goal is to achieve carbon neutrality in the transmission network by 2035. In addition, the company promotes the use of renewable gases in its operations and enables its customers’ transition to low-emission solutions, for example, by granting discounts on the transmission of renewable gases starting from the beginning of 2026.

In terms of energy use, the company’s operations consume natural gas, electricity and district heating. Improving energy efficiency and utilising renewable energy are key goals in the transition towards a low-emission gas infrastructure. Identified impacts, risks and opportunities steer Gasgrid’s strategic planning and operational management. The following tables describe the policies, targets, metrics and measures related to climate change.

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Material topic	Description of sustainability matter	Classification of sustainability matter	Value chain location	Time horizon
Gasgrid’s impacts, risks and opportunities related to climate change				
Climate change mitigation	<ul style="list-style-type: none"> › Methane emissions from compressor stations, and maintenance and connection work and fugitive emissions from the transmission pipeline › Carbon dioxide emissions from the LNG terminal and transmission network 	⊖	⊙	Ⓢ
	<ul style="list-style-type: none"> › Prevention of methane emissions and reduction of fugitive methane emissions with technical solutions › Replacing natural gas with biogas or e-methane in own operations, especially in the transmission network 	⊕	⊙	Ⓢ Ⓜ Ⓛ
	<ul style="list-style-type: none"> › Carbon handprint in customer projects, when natural gas or other fossil fuels are replaced with biogas, hydrogen or e-methane 	⊕	Ⓨ	Ⓢ Ⓜ Ⓛ
	<ul style="list-style-type: none"> › Transition risk: Tightening environmental legislation, particularly with regard to methane emissions, may increase technical and financial pressures on investments, such as leakage elimination and measurement systems, that increase short-term costs. 	Ⓡ	⊙	Ⓜ
	<ul style="list-style-type: none"> › Transition risk: Rising emissions allowance prices increase the costs of operations using fossil-based energy in both LNG terminals and gas transmission business. These types of developments may affect businesses’ profitability and entail financial impacts during the transition towards lower-emission solutions. 	Ⓡ	⊙	Ⓢ

- ⊕ Positive impact
- ⊖ Negative impact
- Ⓡ Risk
- ⊙ Opportunity
- Ⓜ Upstream
- ⊙ Own operations
- Ⓨ Downstream
- Ⓢ Short-term
- Ⓜ Mid-term
- Ⓛ Long-term

Material topic	Description of sustainability matter	Classification of sustainability matter	Value chain location	Time horizon
Climate change mitigation	<p>› Transition risk: Tightening regulation and the shift in the operating environment from fossil gases to renewable and low-carbon gases may create transition risks for the gas business, such as increased investment needs, technological adaptation pressures, and the reassessment of business models. These types of developments may have an impact on operating costs.</p>	R	▲ ● ▼	M
	<p>› As the LNG terminal is based on a ship solution instead of permanent infrastructure, Gasgrid is able to flexibly adapt to changes in policy, legislation and the markets. This adaptability reduces decommissioning and shutdown costs and enables a rapid transition to new energy forms or other uses, which supports business continuity and taking advantage of new opportunities.</p>	O	●	L
	<p>› Transition risk and opportunity: Tightening regulation aimed at achieving climate targets creates new business opportunities in the hydrogen economy and, in turn, new investment needs for the development of hydrogen infrastructure. On the other hand, uncertainty and changes in the policy and regulatory environment may hinder development and the progress of investments, potentially affecting the planning and costs of investments.</p>	R O	▲ ● ▼	M
	<p>› Transition risk: Volatility and price fluctuations in global energy markets may reduce demand for LNG and affect the terminal's utilisation rate. These types of developments may result in fluctuations in revenue streams and cash flows.</p>	R	●	M
	<p>› Transition risk: A reduction in natural gas transmission volumes for climate-related reasons may affect both the utilisation rate of the LNG terminal and the efficiency of the transmission business, and thereby operating costs.</p>	R	●	L
	<p>› Transition risk and opportunity: As the green transition advances, demand for renewable and low-carbon gases will increase, which attracts sustainability-focused investments and creates new business opportunities for Gasgrid in both hydrogen development and the gas transmission business. At the same time, regulation and the changing operating environment require a rapid transition from fossil gases to renewable and low-carbon gases, creating both growth potential and transition risks as these businesses adapt to the change.</p>	R O	●	M
	<p>› Transition risk: The technology related to the development of the hydrogen economy is largely new compared with the current natural gas transmission infrastructure. This may have an impact on the planning and costs of early-stage investments.</p>	R	▲ ● ▼	L

- + Positive impact
 ▲ Upstream
 S Short-term
- Negative impact
 ● Own operations
 M Mid-term
- R Risk
 ▼ Downstream
 L Long-term
- O Opportunity

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Material topic	Description of sustainability matter	Classification of sustainability matter	Value chain location	Time horizon
Energy	› Energy consumption of operations, properties, the LNG terminal and compressor and pressure reduction stations	⊖	⊙	Ⓢ
Climate change adaptation	› Physical risk: An exceptionally long and warm period during the winter months may reduce gas demand, resulting in the LNG terminal capacity being utilised less than normal. This may have an impact on operating costs during periods of low demand.	Ⓡ	⊙	Ⓢ Ⓜ Ⓛ

⊕	Positive impact	Ⓜ	Upstream	Ⓢ	Short-term
⊖	Negative impact	⊙	Own operations	Ⓜ	Mid-term
Ⓡ	Risk	Ⓣ	Downstream	Ⓛ	Long-term
⊙	Opportunity				

A summary of policies, targets, metrics and actions that guide our work related to climate change.

Material topic	Policies	Targets	Metrics	Actions
Gasgrid's policies, targets, metrics and actions related to climate change				
Climate change mitigation	Code of Conduct	› Achieving Scope 1–2 carbon neutrality of the transmission network by 2035 › Enabling emission reductions through gases with lower emissions › Growing the entry volume of renewable gases	› Absolute emissions t CO ₂ e › Estimated emissions reduction Mt CO ₂ e/year › Growing the entry volume: GWh/year	› Execution of the transmission network carbon neutrality roadmap advanced › Pricing of renewable gas transmission developed › Climate impacts of the hydrogen pipeline assessed by means of a thesis › Introduction of a container entry point for injection into the network from facilities outside the network
Energy	Code of Conduct	› Improving energy efficiency in gas transmission: energy consumption –10% compared to the amount of transmitted gas	› Energy consumption compared to the amount of transmitted gas GWh/TWh of transmitted gas	› Energy consumption of gas transmission monitored and analysed › Energy audits drawn up for own sites
Climate change adaptation	Code of Conduct	› Preparing for extreme weather events: Zero supply interruptions per year due to extreme weather events	› Number of supply interruptions due to extreme weather events	› Preparations for extreme weather events as part of maintenance, for example, by felling trees

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E1-1 – Transition plan for climate change mitigation

We have begun developing a transition plan for climate change mitigation. Gasgrid has an approved carbon neutrality roadmap, which will steer the company’s operations towards a carbon neutral transmission network by 2035. The roadmap complies with the requirements of the Climate Act and supports the EU’s climate neutrality objective. Our climate goals and measures are in line with the Paris Agreement’s 1.5 °C target, and we are planning to draw up a scientific compatibility analysis.

Gasgrid’s investments focus on renewable gas and hydrogen infrastructure, in addition to emission-reduction measures, which also support the EU taxonomy’s criteria for climate change mitigation.

In our carbon neutrality roadmap, we present our key means and measures to reduce emissions, which are:

- › The management and reduction of methane emissions: The goal is to reduce the transmission network’s greenhouse gas emissions by 60 per cent by 2030 and to continue annual reductions.
- › The introduction of biogas for self-consumption to reduce fossil emissions.
- › Properties’ energy-efficiency measures: Increasing heat recovery, optimising ventilation and heat pump solutions.
- › Significantly growing the entry volume of renewable gases.
- › Developing the hydrogen economy and building hydrogen infrastructure.

The LNG terminal has been excluded from the emission-reduction goal because the vessel is leased for the operations until the end of 2032. The LNG ship uses fossil LNG supplied by and owned by customers in its operations. Thus, achieving the conditions for carbon neutrality is largely based on the market development, availability and costs of bio-LNG.

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

The Code of Conduct steers Gasgrid’s climate change mitigation, energy-efficiency measures and climate change adaptation. The policies specify the goals and practices for reducing methane and carbon dioxide emissions, improving energy efficiency, enabling the transmission of renewable energy and preparing for risks resulting from climate change. The Code of Conduct is integrated into the management system, and we monitor its implementation using, for example, the ISO 14001 environmental management system, the ETJ+ energy-efficiency system and risk management processes. The policies support the achievement of strategic goals and steer sustainable activities throughout the organisation and in its value chain.

Material topic	Policies	Key contents and target related to the material topic	Related impacts, risks and opportunities	How is it monitored?
Policies related to climate change				
Climate change mitigation	Code of Conduct	› The policy drives the reduction of methane and carbon dioxide emissions, the transmission of renewable energy, and improvements in energy efficiency. The goal is to ensure uninterrupted operations that cause no harm, minimise emissions throughout the life cycle, and develop infrastructure for renewable and low-carbon gases.	› Reducing emissions that are harmful to the climate, promoting the use of renewable gases, enabling the hydrogen economy, and managing transition risks	› ISO 14001, the ETJ+ energy-efficiency system, internal and external audits, emissions reporting, sustainability programme
Energy	Code of Conduct	› The policy drives the management of energy consumption, reduction in the use of fossil fuels and deployment of renewable energy. The goal is to ensure good energy efficiency, minimise emissions throughout the life cycle and responsible operations also in the procurement chain.	› Emissions caused by energy consumption and use of fossil fuels, improving energy efficiency and integrating renewable energy as part of operations	› ETJ+ energy-efficiency system, ISO 14001, emissions reporting, audits, sustainability programme
Climate change adaptation	Code of Conduct	› The policy drives the identification and management of physical risks caused by climate change, such as extreme weather events and infrastructure vulnerability. The goal is to prepare for disruptions, ensure reliable gas transmission and improve resilience as part of strategic management.	› Managing physical climate risks, such as extreme weather events, reliable gas transmission and infrastructure resilience, and strengthening overall resilience	› Regular risk assessments, review by the Management Team and Board of Directors, internal audit, continuous monitoring

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

Gasgrid’s actions and resources related to climate change are part of the company’s strategic sustainability work and sustainability programme. The actions are directed especially at reducing methane and carbon dioxide emissions, improving energy efficiency and preparing for the physical risks caused by climate change. The actions implemented by Gasgrid in 2025, together with the planned development measures, support the 2035 carbon-neutrality goal and address the identified risks and opportunities. We assess the effectiveness of measures in relation to the expected results, such as emission reductions, maintaining the reliability of gas transmission and integrating renewable gases.

Implementing climate-change-related actions requires significant investments and operating expenses. We have targeted resources at, for instance, the renovation of pressure reduction stations’ heating systems, improving energy efficiency in the transmission network, and technical solutions to prevent methane emissions and remedy fugitive emissions. Investments in measurement systems and leakage elimination also produce moderate costs. Additionally, we use the EU’s CEF funding in hydrogen infrastructure projects, which supports the transition to low-emission solutions and reduces financing risks.

Material topic	Actions taken in 2025	Expected outcome
Actions related to climate change		
Climate change mitigation	<ul style="list-style-type: none"> › Execution of the transmission network carbon neutrality roadmap advanced 	<ul style="list-style-type: none"> › 10% reduction in the emissions of the transmission network
	<ul style="list-style-type: none"> › Pricing of renewable gas transmission developed › Climate impacts of the hydrogen pipeline assessed by means of a thesis 	<ul style="list-style-type: none"> › Growing the transmission of renewable gases in the transmission network › Use of the results in the planning of hydrogen infrastructure
	<ul style="list-style-type: none"> › Introduction of a renewable gas container entry point for injection into the network from facilities outside the network 	<ul style="list-style-type: none"> › Growing the entry volume of renewable gases
Energy	<ul style="list-style-type: none"> › Energy consumption of gas transmission monitored and analysed › Energy audits drawn up for own sites 	<ul style="list-style-type: none"> › Observation of energy consumption deviations › Identification of energy saving measures
Climate change adaptation	<ul style="list-style-type: none"> › Preparations for extreme weather events as part of proactive maintenance, for example, by felling trees 	<ul style="list-style-type: none"> › Prevention of storm damage to the gas infrastructure

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

Gasgrid has set concrete targets related to climate change mitigation, improving energy efficiency and adapting to climate change. Gasgrid’s goal is a 60 per cent reduction in Scope 1–2 emissions in the transmission network by 2030 and carbon neutrality by

2035. The emission reduction target is based on the emission level for 2024, which is used as the reference year. The targets are based on the company’s sustainability programme and strategy, and they support the transition towards a carbon-neutral gas infrastructure. The table below illustrates Gasgrid’s targets related to climate change and their outcomes

in 2025. We systematically monitor the progress of the targets and update them to meet changes in the operating environment and stakeholders’ expectations, as needed.

Material topic	Target	Target level and unit of measurement	Scope	Base year	Time horizon and milestones	Methods and assumptions	Scientific reasoning	Outcome in relation to target
Targets related to climate change mitigation and adaptation								
Climate change mitigation	Scope 1–2 carbon neutrality of the transmission network in 2035	Carbon neutrality in 2035 (absolute)	Gasgrid’s transmission network	2024	2024–2035 (milestone 2030)	Carbon neutrality roadmap, emissions calculation and its emission factors, management review	Yes	Emissions calculated and verified, emissions disclosed in the annual report 
	Enabling emission reductions through renewable and low-carbon gases	MtCO ₂ e/year (absolute)	New gas customer projects and hydrogen pipeline	2024	2024–2026	Emissions trading reporting (ETS2), thesis, EIA calculation	Yes	Reporting completed, calculation ready in 2026 
	Growing the entry volume of renewable gases	Increase in entry volume compared to the baseline (140 GWh) (absolute)	Executing renewable gas projects in the gas network	2024	2024–2026	Technical execution, capacity calculation	No	Introduction of a container entry point for injection into the network from external facilities 
Energy	Improving energy efficiency in gas transmission	Energy consumption –10% compared to the amount of transmitted gas (relative)	Gas transmission network and LNG terminal	2024	2024–2026	Calculation of the energy saving targets stated in the energy audit report	No	Audit reports reviewed 
Climate change adaptation	Preparing for extreme weather events	Zero supply interruptions per year (absolute)	Gas transmission network	2024	Continuous	Maintenance function’s reporting on measures	No	No disruptions 

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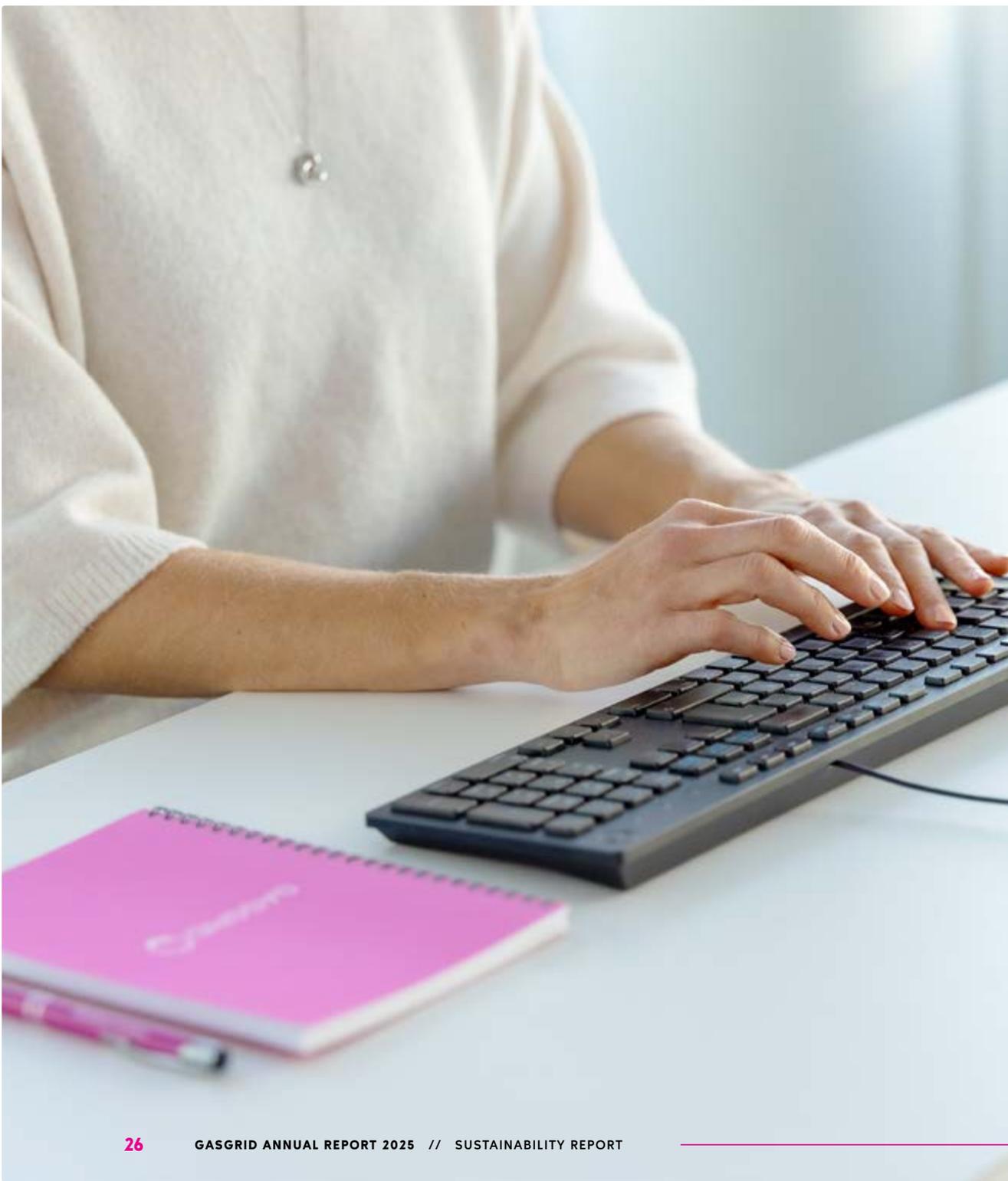
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Thesis examines the climate impacts of the national hydrogen transmission network

In 2025, Gasgrid supervised a master's thesis assessing the life-cycle climate impacts of Finland's national hydrogen transmission network. The study originated from a need to understand the potential climate impacts of the planned hydrogen transmission network and to identify the factors influencing these impacts. The studied unit was 100 kilometres of Finland's national hydrogen transmission network, and the assessment was conducted as a life cycle assessment (LCA), which covered the life cycle of the network from the raw material supply to construction, use and demolition. The assessment was conducted in accordance with the global ISO standards, and the calculations applied data from previous studies and expert assessments, as there was no primary data available on the network.

Based on the results, the most significant climate impacts are related to potential leakage during the use of the hydrogen transmission network, highlighting the need for leak prevention through high-quality materials, robust design and advanced leak detection technologies. The estimated emission intensity of the hydrogen network enabling the hydrogen economy is, however, significantly lower than that of Finland's current energy sector. This indicates that transitioning to the hydrogen economy could materially reduce the climate impacts of Finland's energy production. All of the presented findings are based on calculated estimates and data from the previous studies, which means that they do not describe the actual emission levels and are not based on primary data from Finland's national hydrogen transmission network.

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E1-5 – Energy consumption and mix

Gasgrid's energy consumption from its own operations consists mainly of the energy use of the LNG terminal and the gas transmission network. The terminal's energy use is related especially to the ship's own energy production and gas regasification and compression. The terminal's standby power systems also use gas oil. The energy consumption of the transmission network consists of natural gas consumption in gas transmission and heating of buildings, fuel oil consumption of standby power plants, and purchased electricity and heat consumption.

In 2025, the total energy consumption was 435 gigawatt hours, of which the LNG terminal company consumed 390 gigawatt hours. Energy consumption data is based on direct measurements and energy suppliers' invoicing.

Gasgrid operates in an industry with significant climate impacts (NACE code D35.22, gas transmission infrastructure), and its energy consumption is largely based on fossil fuels, in particular natural gas. The share of renewable energy is still low, but increasing it is part of the company's carbon neutrality goal for 2035.

Gasgrid does not use energy based on nuclear power in its operations. Gasgrid does not buy energy based on nuclear power in its operations. The proportion of nuclear energy of the used energy is not available as the energy consumption data provided by suppliers does not include a breakdown of the forms of energy production.

Energy consumption from renewable resources consisted mainly of purchased electricity and heat (16 gigawatt hours) in 2025. We procured purchased electricity with wind certificates. In addition, the consumption of fuel from renewable sources was 200 megawatt hours and it consisted largely of biogas. Gasgrid did not itself produce renewable energy.

Energy consumption and mix	2025
Total energy consumption (MWh)	434,500
Total fossil energy consumption (MWh)	418,400
Fuel consumption from coal and coal products (MWh)	0
Fuel consumption from crude oil and petroleum products (MWh)	1,200
Fuel consumption from natural gas (MWh)	409,000
Fuel consumption from other fossil sources (MWh)	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	8,200
Share of fossil sources in total energy consumption (%)	96
Consumption from nuclear sources (MWh)	0
Share of consumption from nuclear sources in total energy consumption (%)	0
Total renewable energy consumption (MWh)	16,100
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	200
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	15,900
Consumption of self-generated non-fuel renewable energy (MWh)	0
Share of renewable sources in total energy consumption (%)	4

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Gasgrid did not use fuel sourced from coal or coal products. Fuel consumption from crude oil and petroleum products was related to the fuel oil consumption of standby power plants, vehicle traffic and the LNG terminal's fuel oil use. Natural gas is a significant fossil fuel, and we use it especially in pressure reduction and compression stations and for the heating of properties. At the LNG terminal, the majority of fuel consumption is related to the regasification and compression of LNG on the terminal ship.

Fossil fuel consumption came to 410 gigawatt hours in 2025. Gasgrid's operations do not use significant volumes of fossil fuels other than LNG, natural gas and fuel oil. The amount of gas transmitted by Gasgrid for its customers, 15.5 terawatt hours, is not included in Gasgrid's own energy consumption.

In 2025, our purchased electricity and heat consumption from fossil fuel sources was approximately 8,200 megawatt hours. We used purchased energy especially in the transmission pipeline's pressure reduction stations and to heat properties. We report a proportion of the purchased electricity and heat as fossil in origin, in accordance with the principle of prudence, because we have not received guarantees of origin (GOs) for the energy.

Gasgrid's energy intensity in 2025 was 3,900 megawatt hours per million euro. The calculations are based on the energy consumption and net sales of the entire Group because the company operates in an industry with significant climate change impacts. In 2025, net sales were EUR 111.5 million and total energy consumption was 435 gigawatt hours.

Energy intensity per net revenue	2025
Total energy consumption from activities in high climate impact sector per net revenue from activities in high climate impact sectors (MWh/MEUR)	3,900

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

Total GHG emissions	Retrospective	
	Base year 2024	2025
Scope 1 GHG emissions		
Gross Scope 1 greenhouse gas emissions (t CO ₂ e)	90,700	71,800
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	92	91
Scope 2 GHG emissions		
Gross location-based Scope 2 greenhouse gas emissions (t CO ₂ e)	1,700	1,400
Gross market-based Scope 2 greenhouse gas emissions (t CO ₂ e)	2,000	1,300
Significant Scope 3 GHG emissions		
Total gross indirect (Scope 3) GHG emissions (t CO ₂ e)	36,700	28,600
1 Purchased goods and services	1,000	2,800
2 Capital goods	2,300	1,000
3 Fuel and energy-related activities	33,300	24,600
4 Upstream transportation and distribution	< 10	30
5 Waste generated in operations	< 50	70
6 Business travel	< 50 estimation	< 60 estimation
7 Employee commuting	< 100 estimation	< 100 estimation
Total GHG emissions		
Total GHG emissions (location-based) (t CO ₂ e)	129,100	101,800
Total GHG emissions (market-based) (t CO ₂ e)	129,400	101,700

GHG emission intensity per net revenue	2025
Total GHG emissions (location-based) per net revenue (t CO ₂ e/MEUR)	910
Total GHG emissions (market-based) per net revenue (t CO ₂ e/MEUR)	910

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The calculation of Gasgrid Group's greenhouse gas emissions is based on the GHG Protocol standard and the operational control approach. We primarily use factors specified by suppliers, the industry, and national authorities and bodies in calculations and secondarily Defra 2025 emission factors and IPCC AR5's GWP100 values. The calculation of the natural gas use-phase GHG emissions takes into account only the carbon dioxide emissions from combustion, not other GHG emissions. We report emissions in the Scope 1, 2 and 3 classes, and they cover both own operations and material value chain emissions.

Scope 1 emissions mainly consist of the natural gas consumed by the LNG terminal vessel for its own energy production and regasification processes, and small amounts of gas oil used on the vessel. The transmission network's Scope 1 emissions were 6,930 t CO₂e, which consisted of methane leaks, the combustion of natural gas, minimal coolant leaks and light fuel oil use. In the transmission network, fugitive methane emissions accounted for 16 per cent of methane emissions.

Scope 2 emissions come from purchased energy and heat consumption. The electricity purchased by Gasgrid is renewable wind power. In emissions calculation, part of the pressure reduction stations' electricity and heat has been calculated using location-based emission factors, in accordance with the principle of prudence, because we have not received guarantees of origin (GOs) for the energy.

Scope 3 emission calculations take into account the following material categories: purchased products and services, capital goods, primary production and transportation of fuels and energy, upstream transport and distribution, waste, business travel, and employees' commutes. Emissions from gas distribution and the use of sold products, which are part of the customers' value chain, have been excluded from the calculations.

Our emission reporting is both location-based and market-based, and we have calculated the greenhouse gas intensity in relation to the transmitted amount of gas.

We report biogenic carbon dioxide emissions (32 t CO₂e) separately from the Scope 1 emissions, and they consist of biogas use and driving biogas cars.

We comply with the principle of prudence in our reporting and use up-to-date, verifiable sources. We have documented the calculation methods, sources and assumptions.



“We are aiming for a 60 per cent reduction in emissions across our transmission network by 2030.”

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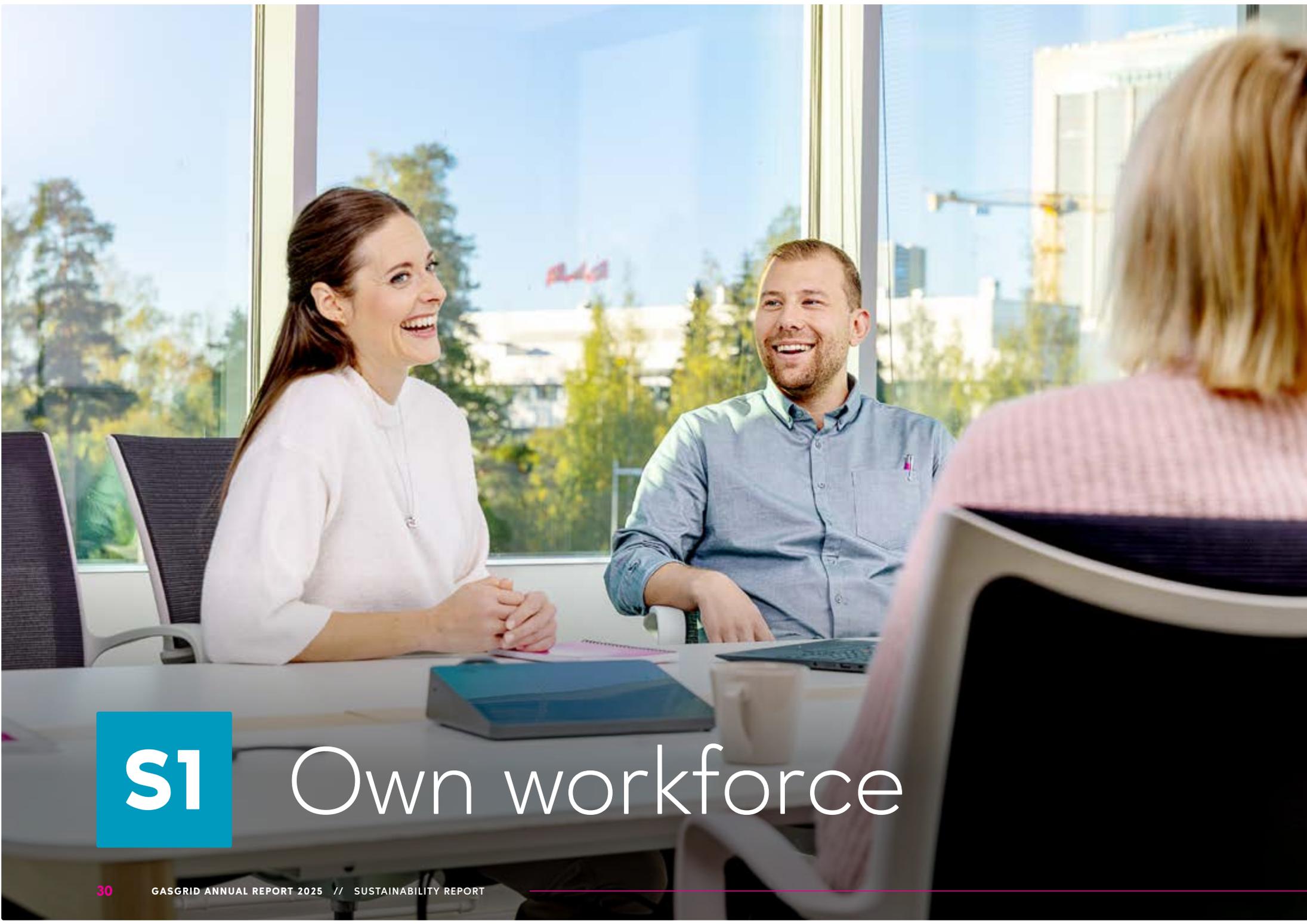
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S1

Own workforce

Disclosure Requirement related to SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Gasgrid’s strategy is based on competent and committed personnel, and our workforce is a key factor in the company’s value creation and realisation of strategic goals. The impacts, risks and opportunities related to the workforce have been identified as part of our double materiality assessment, and they steer both strategic planning and operational management.

Material impacts are, for instance, occupational safety, non-discrimination, and developing competence. Identified negative impacts have been one-off incidents. One identified risk is the availability of a skilled workforce, particularly as the hydrogen business expands, which can impact the progress and competitiveness of strategic projects. We see the personnel’s development and commitment as an opportunity that supports the company’s growth and sustainability targets.

We have integrated the management of impacts and risks into the business model, for example, through the sustainability programme, Risk Management Policy and personnel strategy. These serve to ensure that workforce-related factors support the implementation of the strategy and business continuity. The topics presented in the table, and the related specified impacts, risks and opportunities, were identified as material topics related to our own workforce.

Material topic	Description of sustainability matter	Classification of sustainability matter	Value chain location	Time horizon
Gasgrid’s impacts, risks and opportunities related to own workforce				
Working conditions: Health and safety	› Employees’ work-related injuries and accidents	⊖	⊙	Ⓢ
	› Occupational health and well-being services, which emphasise preventive occupational healthcare, offered to employees	⊕	⊙	Ⓢ Ⓜ
	› Training requirements related to occupational safety, first-aid fire extinguishing and first-aid	⊕	⊙	Ⓢ Ⓜ
Equal treatment and opportunities for all: Training and skills development	› Gender equality, pay transparency and equal pay for equal work	⊕	⊙	Ⓜ
	› Growth of the organisation and resulting increase in new tasks, workload and need for orientation	⊖	⊙	Ⓢ
	› Enabling equal training and skills development for increasingly multilingual teams	⊖	⊙	Ⓢ

- ⊕ Positive impact
- ⊖ Negative impact
- Ⓢ Short-term
- Ⓜ Mid-term
- Ⓛ Long-term
- Ⓡ Risk
- Ⓞ Opportunity
- Ⓜ Upstream
- Ⓞ Own operations
- Ⓢ Downstream

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Material topic	Description of sustainability matter	Classification of sustainability matter	Value chain location	Time horizon
Working conditions and equal treatment and opportunities for all	› Investments in developing employees' competence, well-being, and an inclusive workplace culture can increase employee engagement and motivation. This can improve productivity, reduce employee turnover, and strengthen Gasgrid's competitiveness in the talent market, supporting the success of strategic projects and long-term value creation.	⊕	⬆	Ⓢ
Working conditions: Social dialogue	› Continuous dialogue with the personnel through the personnel and culture forum, where the topics of occupational health and safety, co-operation, and matters related to management, managerial work, competence development, performance management and engagement are discussed.	⊕	⬆	Ⓜ Ⓛ
Entity-specific sub-topic: Availability of skilled workers	› Hydrogen economy projects increase the demand for specialised expertise, and the shortage of skilled professionals as well as the turnover of experts can lead to skills gaps. Situations like this may affect recruitment costs and project timelines.	Ⓡ	⬆	Ⓢ

- ⊕ Positive impact ⬆ Upstream Ⓢ Short-term
- ⊖ Negative impact ⬇ Own operations Ⓜ Mid-term
- Ⓡ Risk ⬇ Downstream Ⓛ Long-term
- ⊕ Opportunity

The table below shows a summary of the policies, goals, metrics and measures guiding own workforce.

Material topic	Policies	Targets	Metrics	Actions
Gasgrid's policies, targets, metrics and actions related to own workforce				
Health and safety	Code of Conduct	› Forerunner in occupational safety culture in own and suppliers' operations: 100% completion of occupational safety courses by personnel and key suppliers, zero lost-time injuries › Maintaining work ability throughout career	› Number of course completions › Number of accidents	› Safety training, first-aid training, first-aid fire extinguishing training, zero-accident campaign › OHS meetings with suppliers, processing of audit findings › Occupational healthcare's action plan, workplace surveys, assessment of psychosocial stress factors, and health check-ups › Ensuring the validity of employees' and suppliers' occupational safety cards

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Material topic	Policies	Targets	Metrics	Actions
Social dialogue	Code of Conduct	<ul style="list-style-type: none"> Continuous and inclusive dialogue with personnel: regular personnel and culture forums 	<ul style="list-style-type: none"> Number of personnel and culture forums per year 	<ul style="list-style-type: none"> Personnel and culture forum, personnel info sessions, intranet communication
Availability of skilled workers	Code of Conduct	<ul style="list-style-type: none"> Recruiting the right experts and employee retention 	<ul style="list-style-type: none"> Turnover, % 	<ul style="list-style-type: none"> Recruitment, Gasgrid Academy, managerial coaching Ensuring transparency and non-discrimination in the recruitment process Implementation of pre-employment and periodic health check-ups
Training and skills development	Code of Conduct	<ul style="list-style-type: none"> Sufficient expertise in the gas industry, qualifications met: 100% qualifications 	<ul style="list-style-type: none"> Number of completed qualification courses per requirement 	<ul style="list-style-type: none"> Monitoring of training hours and development discussions in the HR system Automation of internal online course completion records in the HR system Gasgrid Academy's managerial coaching Updating the training guidelines
Gender equality and non-discrimination	Code of Conduct	<ul style="list-style-type: none"> No unjustified pay gaps, equal treatment and career advancement: Zero instances of unjustified pay gaps 	<ul style="list-style-type: none"> Pay gaps in HAY grades 	<ul style="list-style-type: none"> Annual updating of the equality plan and emphasising equal treatment in managerial training Pay surveys, investigation of the reasons for pay gaps in HAY grades 13-16

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S1-1 – Policies related to own workforce

Gasgrid’s Code of Conduct steers material topics related to own workforce. The policy’s main contents are presented in the table.

Material topic	Policies	Key contents and target related to the material topic	Related impacts, risks and opportunities	How is it monitored?
Policies related to own workforce				
Health and safety	Code of Conduct	<ul style="list-style-type: none"> Our goal is an accident-free work environment, the systematic development of the safety culture, and the commitment of all stakeholders to safety principles 	<ul style="list-style-type: none"> Work-related injuries, loss of work ability, lack of safety culture, supply chain safety deviations 	<ul style="list-style-type: none"> Safety observations, handling of deviations, training, audits, co-operation with occupational healthcare services, management system in compliance with ISO 45001
Social dialogue	Code of Conduct	<ul style="list-style-type: none"> We involve personnel and consult them when planning operations, in practices and when developing the corporate culture 	<ul style="list-style-type: none"> Lack of commitment, work atmosphere, building trust 	<ul style="list-style-type: none"> Development discussions, regular interaction, internal communication, stakeholder forums
Availability of skilled workers	Code of Conduct	<ul style="list-style-type: none"> Our strategic goal is to be an attractive employer and a breeder of talent 	<ul style="list-style-type: none"> Shortage of skilled professionals, competition for labour, recruitment risks 	<ul style="list-style-type: none"> Developing employer image, development discussions, skills development plans
Gender equality and non-discrimination	Code of Conduct	<ul style="list-style-type: none"> We are committed to non-discrimination, equal treatment, and respect for human rights 	<ul style="list-style-type: none"> Pay injustice, reputational damage, employee dissatisfaction 	<ul style="list-style-type: none"> Professional conduct, equal leadership, internal control, development discussions
Training and skills development	Code of Conduct	<ul style="list-style-type: none"> We systematically develop our competence and set targets annually in development discussions 	<ul style="list-style-type: none"> Obsolescence of competence, barriers to career development, decline in competitiveness 	<ul style="list-style-type: none"> Development discussions, training plans

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Human rights policy commitments and Code of Conduct related to own workforce

Gasgrid is committed to respecting human rights and acting responsibly throughout the organisation. The company is committed to the UN Global Compact and promotes the principles presented therein, which cover human rights, labour rights, as well as the environment and combatting corruption. Gasgrid's Code of Conduct states that we do not, in any circumstances, approve of human trafficking, forced labour, undeclared labour or child labour. In our operations, we comply with national and EU-level legislation, international agreements and the UN's, ILO's and OECD's principles and recommendations. Our principles related to the workforce are aligned with globally recognised principles, such as the UN Guiding Principles on Business and Human Rights (UNGPs). We have integrated the basic principles and rights of working life into our practical policies and guidelines as part of sustainability management and ethical practices.

Gasgrid's human rights policy commitments are reflected in the company's Code of Conduct and policies, with which we ensure the realisation of the personnel's rights and make it possible to address concerns. The company maintains an open and inclusive dialogue with its workforce across multiple channels. A core principle is involving and consulting personnel when planning operations, practices related to the personnel and developing the corporate culture. This is supported by the personnel and culture forum, which functions as a permanent dialogue channel between the personnel and management and promotes the personnel's participation and collaboration in developing the company. Through the forum, the personnel's views and experiences become part of the company's decision-making and development of its practices.

In addition, Gasgrid has a channel for reporting misconduct that aligns with the Whistleblower Directive and the national Whistleblower Act, and which has been in use from the start of the company's operations. Reports can be submitted anonymously, and the identity of the whistleblower is secured by technical means. The channel can be used to report suspected unethical activity and violations of the law subject to the

Whistleblower Act, and it can be utilised by all internal and external stakeholders through Gasgrid's website. The whistleblowing channel has been implemented together with an independent and external partner, and its procedure for processing the reports is documented.

Misconduct can also be reported through other channels: email, the customer service system or direct observation by personnel. If a message or piece of information appears to be a report of misconduct, it is immediately forwarded to a working group, which assesses whether the report meets the criteria for misconduct. If the criteria are met, the report is transferred to a separate handling process and an investigation is launched, with the help of an external partner if necessary. Any potential reports are submitted biannually to the Management Team as part of the management's review and communicated to the Audit Committee and Board of Directors as part of the sustainability review.

Through these dialogue channels and reporting mechanisms, we promote an open and inclusive operating culture in which the personnel have the opportunity to express their observations and views. This ensures that we can address any concerns and human rights impacts in line with the principles and take the necessary corrective actions.

Workplace accident prevention policy and management system

At the core of Gasgrid's safety culture is preventive and continuously developing safety work, with a goal of zero accidents. The company's Code of Conduct entails that we maintain and develop the safety culture systematically with the entire personnel and partners. Everyone is permitted and obliged to address unsafe activities and look after their own and other people's well-being. We systematically monitor compliance with safety guidelines and safe work methods, and we record and investigate all incidents relating to safety in order to define corrective actions.

Gasgrid also requires its service and goods suppliers and their subcontractors to commit to the company's safety policy and Code of Conduct. We develop safety through training, hazard and risk assessments, and

regular dialogue with personnel and partners. We actively process occupational safety in different forums, such as the Occupational Health and Safety Committee and management forums. The company additionally operates in accordance with a certified ISO 45001 occupational health and safety management system.

Policies concerning discrimination and harassment

Gasgrid's Code of Conduct involves non-discrimination, equality and promoting diversity in all activities. The company treats all of its stakeholders equally and acts openly and objectively towards them, and does not accept discrimination or harassment of any kind. The non-discrimination and equality principles are integrated into the Code of Conduct and the equality and non-discrimination plan, which steer daily decision-making and human resources (HR) processes. We manage our personnel fairly and in a goal-oriented manner in line with good management principles, and we involve personnel and consult them when planning operations, in practices related to the personnel and when developing the corporate culture. We support the well-being and competence of all employees systematically, and everyone has an equal opportunity to participate in joint events, training and development measures.

We ensure the implementation of these principles through concrete procedures included in the company's HR processes. In recruitment, we follow the principles of non-discrimination and gender neutrality, and employees' career development is based on competence and merits. We develop working conditions to be accessible, and we address harassment in accordance with separate guidelines. Remuneration is gender neutral and based on collective agreements, and we carry out pay surveys annually. We engage in dialogue with the personnel through the personnel and culture forum, for instance, and report openly on the updating of plans. In addition, Gasgrid Academy supports good management and competence development through coaching.

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

Gasgrid maintains active and multi-channel engagement with its own workforce and their representatives on the actual and potential impacts on the personnel. We use our personnel's views to develop operations, implement the strategy and execute the sustainability programme. The dialogue supports Gasgrid's goal of building an open, inclusive and supportive work community.

Engagement is achieved through managerial work, and, for example, we offer each of our employees the opportunity to participate in a one-on-one "How are you?" discussion every quarter. In addition, annual development discussions support employees' competence, motivation and well-being. We recommend documenting the discussions in the HR system, and they function as part of the individual's performance and workload monitoring.

We engage in dialogue also structurally through the personnel and culture forum, which convenes at least six times a year and operates in line with the Co-operation Act. The forum consists of representatives of the employer, employees and different personnel groups and businesses. The forum discusses, for example, occupational well-being, occupational health and safety (OHS), management, competence development and performance management. In the forum, the management representative holds the highest position and, if needed, brings matters discussed by the forum before the Management Team. Operational responsibility is shared among all of the members of the forum, and the head of the forum (HR) communicates the forum's decisions to the personnel. We save the forum's minutes in the document management system and publish a summary on the intranet.

The Occupational Health and Safety Committee functions as a separate structure and, if needed, brings matters before the personnel and culture forum for discussion, or vice versa. The committee consists of the health and safety delegate, HR manager, and health and safety manager. Gasgrid's Occupational Health and Safety Committee discusses matters related to occupational safety and occupational well-being based, for example, on surveys conducted in connection with workplace surveys and personnel surveys.

We assessed the effectiveness of engagement in an annually implemented personnel survey, which includes quantitative and open questions about, for example, managerial work, occupational well-being, the clarity of tasks and the understandability of the strategy. The CEO sends the survey to the entire personnel, and the Management Team discusses its results and assigns the measures to designated persons.

As part of these engagement processes, Gasgrid aims to identify and take into consideration also the perspectives of employees who may be particularly vulnerable to impacts or marginalisation. The company has identified foreign-language employees as one such group, and we have developed local measures to support them, which we carry out through collaboration between supervisors and HR. The support can include training, measures that strengthen the sense of community and individual guidance, and we define its scope based on the need assessed by supervisors.

Gasgrid communicates with its personnel regularly, openly and understandably on the company's strategic goals, management, values and ways of working. In our communications, we comply with the code of ethics of the Council of Ethics for Communication (VEN), whose principles are openness, honesty, reliability and respectfulness.

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

Feedback and communication channels

Gasgrid has several feedback and communication channels through which personnel can raise concerns and suggestions related to the development of the company, which are then responded to and reviewed. These channels are:

- › **Intranet:** A communication channel open to all employees, where we release current information, instructions and documents in the document management system, such as HR, training, equality and non-discrimination plans. The intranet also makes it possible to give feedback and share information with the whole personnel.

- › **Personnel info sessions and supervisor communication:** Regular personnel info sessions and supervisors' communication channels provide the opportunity to present questions and receive information on current issues and updates to plans.
- › **Target and development discussions:** Development discussions are regular, confidential and goal-oriented interactive situations between the employee and supervisor, where they review tasks, competence and occupational well-being. In the target discussion, the employee and employer specify 1–3 concrete personal targets in the HR system each year, and monitor their outcomes during the year using self-assessment and the supervisor's assessment.
- › **The "How are you?" discussions:** Gasgrid has developed a regular discussion opportunity with a supervisor, which is offered to each employee. We document the discussions in the HR system.
- › **Personnel and culture forum:** A forum established by the company itself, where personnel representatives can present feedback and concerns anonymously. We handle feedback in the forum regularly and monitor its implementation.
- › **Annual personnel surveys:** A survey established by the company itself, through which we collect feedback from the entire personnel. The surveys include both quantitative and open questions, and we use the results to develop management, occupational well-being and a sense of community.
- › **Mentimeter feedback channel:** An anonymous feedback channel arranged in connection with the monthly personnel info sessions, through which the personnel can give feedback and present questions. We process the feedback during the personnel info sessions or hand it over to the personnel and culture forum to discuss.
- › **Whistleblowing channel:** A reporting channel established by the company itself and implemented together with an external partner, through which employees can anonymously report suspected misconduct or unethical activities. The channel has been used from the start of Gasgrid's operations, and it aligns with the requirements of the EU's Whistleblower Directive.

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“We operate in an equal, transparent, and impartial manner in relation to all our stakeholders.”



Additionally, feedback can be given in various projects and at their different phases, and all of the feedback channels are open to the entire personnel. Processing and monitoring of the feedback is carried out through the forums, personnel info sessions and the sustainability programme's metrics. It is possible to give anonymous feedback through several different channels, and we assign persons to take responsibility for the feedback and report on its processing regularly to the entire personnel.

Awareness of the feedback channels, trust evaluation and whistleblower protection

Gasgrid's Code of Conduct defines the personnel's rights and obligations, as well as the ethical foundation that steers the entire organisation's operations at all of its levels. The whistleblowing channel's

instructions include a clear policy stating that the privacy of the persons using the feedback channels and whistleblowing channels is secured and that we investigate reports of misconduct appropriately and react to them with corrective actions. Reports can be submitted to a supervisor or through the company's website, and the identity of the whistleblower is always secured.

Gasgrid ensures that its personnel are aware of the feedback channels and the related processes by arranging an online course for all of its employees, which provides information on the company's policies, Code of Conduct and use of the whistleblowing channel. The course is obligatory and, in addition, each new employee must attend the sustainability-related unit orientation at the start of their employment. This ensures that each employee is aware of the feedback

channels and understands their purpose and the principles related to whistleblower protection.

We monitor the achievement of trust and openness using an annual personnel survey, which assesses, among other things, management, the work atmosphere, the opportunities to give feedback and the meaningfulness of work. Based on the survey results, we draw up an action proposal for the Management Team. The Management Team assesses and approves the annual actions. We present the actions in the personnel and culture forum and at the personnel info sessions, and review them in our teams. We monitor the realisation of the actions over the course of the year, in connection with the personnel info sessions. In this way, Gasgrid regularly assesses personnel's awareness of the feedback channels and the trust they have in their effectiveness and security.

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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

The management of material impacts on Gasgrid’s personnel is based on a preventive, inclusive and continuously developing operating model. Actions cover the prevention and mitigation of negative impacts, the execution of corrective actions, advancing positive impacts and monitoring their effectiveness. We carry out these actions as part of day-to-day management,

occupational health and safety practices, personnel policy and developing competence. The table below shows the actions related to material topics.

We primarily carry out actions related to our own workforce as part of Gasgrid’s normal operational activities, and their execution does not require any significant investments or separate financial instruments. In 2025, we focused on personnel’s health and safety by arranging safety training, first-aid and first-aid fire extinguishing training, and by maintaining the occupational healthcare action plan, which includes workplace surveys, health check-ups and assessing

psychosocial stress factors. Costs related to these are typically training service and occupational healthcare costs. In addition, we have supported the availability of a skilled workforce through recruitment, which has resulted in external recruitment service costs. Gasgrid Academy’s coaching programmes have developed supervisors’ competence, and they have resulted in separate training costs. Other actions, such as personnel forums, OHS meetings, updating the equality plan and internal online courses are part of normal HR management, which we implement mainly using internal resources.

Material topic	Actions taken in 2025	Expected outcome
Actions related to own workforce		
Health and safety	› Safety training, first-aid and first-aid fire extinguishing training, zero-accident campaign	› Strengthening personnel’s safety competence and reducing work-related injuries
	› OHS meetings with suppliers, processing of audit findings	› Development and harmonisation of suppliers’ occupational safety practices through audits and regular meetings
	› Occupational healthcare’s action plan, workplace surveys, assessment of psychosocial stress factors, and health check-ups	› Development of the work environment and employee well-being
	› Ensuring the validity of employees’ and suppliers’ occupational safety cards	› Maintenance of employees’ and suppliers’ qualifications and prevention of work-related injuries due to lack of competence
Social dialogue	› Personnel and culture forums, personnel info sessions, intranet communication	› The realisation of continuous dialogue and the inclusion of personnel in the organisation’s decision-making and the development of the work environment

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Material topic	Actions taken in 2025	Expected outcome
Availability of skilled workers	› Recruitment, Gasgrid Academy, managerial coaching	› Ensuring the availability of competent personnel and developing supervisors' leadership skills
	› Ensuring transparency and non-discrimination in the recruitment process	› Ensuring the openness and equality of recruitment through transparent practices and clear selection criteria
	› Implementation of pre-employment and periodic health check-ups	› Maintaining work ability and monitoring employees' health through planned check-ups
Training and skills development	› Monitoring of training hours and development discussions in the HR system	› Ensuring the development of employee competence through systematic monitoring
	› Automation of internal online course completion records in the HR system	› Enhancing the training monitoring process through integrated automation
	› Gasgrid Academy's managerial coaching	› Development of supervisors' leadership skills through a two-year coaching programme
	› Updating the training guidelines	› Support for self-motivated education
Gender equality and non-discrimination	› Annual updating of the equality plan and emphasising equal treatment in managerial training	› Enhancing equality among employees and equal treatment through systematic equality work and human-oriented leadership
	› Pay surveys, investigation of the reasons for pay gaps in HAY grades 13-16	› Analysis and documentation of the reasons for pay gaps and the realisation of pay equity

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Prevention and mitigation of negative impacts

The prevention of negative impacts affecting Gasgrid's personnel is based on a preventive and inclusive operating model. Through an early intervention model, we aim to identify work capacity challenges in time, and the occupational health action plan (2024–2026) involves workplace surveys, health checkups, first-aid training and assessments of psychosocial stress factors. The occupational healthcare service participates actively in the Occupational Health and Safety Committee's meetings.

We manage occupational safety in compliance with the ISO 45001 occupational health and safety standard and by using our safety management system. We arrange obligatory safety training for all of our employees and suppliers. We make safety observations and carry out safety walks regularly. Our substance abuse guide supports preventive measures.

Non-discrimination and equality are included in the equality and non-discrimination plan, which covers, for example, pay surveys, recruitment transparency, orientation, career advancement and the accessibility of working conditions. Gasgrid supports the reconciliation of work and family life through flexible working time arrangements and the hybrid model.

Taking corrective action

We investigate all workplace accidents and near-misses systematically, and communicate them to personnel. Based on the investigations, we define and implement corrective actions, whose effectiveness is monitored. Gasgrid addresses cases of harassment in accordance with separate guidelines and carries out the necessary actions without delay. The company analyses and documents the differences observed in pay surveys.

Advancing positive impacts

Gasgrid focuses on managerial work and developing management through the Gasgrid Academy, which offers coaching on strategy implementation, change management and performance management. In development discussions, we define individual goals and competence needs and chart training needs annually.

Gasgrid supports occupational well-being through

diverse occupational healthcare services, such as sports and culture benefits, a sickness insurance fund and mental well-being services. The company supports the work atmosphere and sense of community through various events and work capacity campaigns.

We reward our personnel through a variable bonus scheme, which includes performance bonuses, one-time bonuses and a personnel fund. We carry out recruitment transparently and the orientation process was revamped to support supervisors and new employees.

Monitoring and assessing effectiveness

We monitor the effectiveness of actions through several systems and processes:

- › In the HR system, we report training hours and assess the development of competence through development discussions.
- › Safety metrics, such as accidents, safety observations and training, are discussed by the company's Management Team.
- › We conduct annual personnel surveys and, based on their results, we create actions whose outcome we monitor in the Management Team, on the intranet and at personnel info sessions.
- › The personnel and culture forum functions as a feedback channel and inclusion tool, and we forward its reports to the Management Team for appraisal.

Resources for managing impacts related to own workforce

Gasgrid has assigned both structural and operational resources for managing personnel impacts, supporting continuous improvement and monitoring effectiveness.

KEY FORUMS AND STRUCTURES:

- › **Personnel and culture forum:** Convenes regularly. Its members are representatives of the employer and employees, as well as various personnel groups and businesses. The forum discusses occupational well-being, OHS, management, competence development and corporate culture. The forum's reports are supplied to the Management Team, which ensures that matters reach the decision-making stage.

- › **Occupational Health and Safety Committee:** Deals with issues related to safety and occupational well-being. The committee consists of the health and safety delegate and deputy delegate, HR unit manager, and health and safety manager. If needed, the committee brings matters before the personnel and culture forum.
- › **Corporate security management forum:** Convenes six times a year and deals with personnel safety, occupational safety, information security and continuity management.

COMPETENCE DEVELOPMENT AND WELL-BEING RESOURCES:

- › **Gasgrid Academy:** Offers managerial coaching and supports the implementation of the strategy and the development of the personnel's competence.
- › **HR system:** Training information and development discussions are documented in the system. The training hour outcome is monitored annually.
- › **Occupational healthcare and well-being services:** Occupational healthcare action plan, sports and culture benefit, sickness insurance fund and well-being services.

SAFETY MANAGEMENT RESOURCES:

- › **Safety management system:** We document, investigate and report all incidents related to occupational safety through the system. We use, for example, the number of accidents, near-misses and safety observations, as well as the time it takes to carry out internal investigations, as metrics for the safety goals.

Using these structures and resources, we can systematically manage impacts on the workforce, monitor effectiveness and develop operations continuously.

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

Gasgrid’s targets for managing impacts related to personnel are based on the sustainability programme and the Code of Conduct, which steer the company’s

strategic and operational management. The targets are intended to prevent and mitigate the negative impacts on personnel and to strengthen positive impacts.

The table below illustrates Gasgrid’s targets related to its own workforce and their outcomes in 2025. We

systematically monitor the progress of the targets and update them to meet changes in the operating environment and stakeholders’ expectations, as needed.

Material topic	Target	Target level and unit of measurement	Scope	Base year	Time horizon and milestones	Methods and assumptions	Outcome in relation to target
Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities							
Health and safety	Forerunner in occupational safety culture in own and suppliers’ operations. Maintaining work ability throughout career	100% training completion, zero lost-time injuries (absolute)	Entire personnel and suppliers in Finland	2023	2024–2026	Safety and HR systems, occupational healthcare action plan	Zero lost-time injuries, training completed
Social dialogue	Continuous and inclusive dialogue with personnel	Six personnel and culture forums per year (absolute)	Entire personnel	2023	Continuous	Intranet system, publication of summaries	Forums held, quarterly summaries published
Availability of skilled workers	Recruiting the right experts and employee retention	Turnover % (relative)	Entire organisation	2023	2024–2026	HR supervision, Gasgrid Academy	Recruitment is progressing as planned, the Academy is operating, employee turnover 5.6%
Training and skills development	Sufficient expertise in the gas industry, qualifications met	100% qualifications (relative)	Entire personnel	2023	2024–2026	HR system, development discussions, systematic recording of training in the HR system	Competence plans completed, recording of online training automated
Gender equality and non-discrimination	No unjustified pay gaps, equal treatment and career advancement	Zero instances of unjustified pay gaps (absolute)	Entire personnel	2024	2025	Analysis according to the Act on Equality between Women and Men, personnel survey, HAY grading	Pay survey completed, grounds established

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Personnel's participation in monitoring and developing the targets

Gasgrid's personnel and its representatives monitor the achievement of the targets in particular through the personnel and culture forum. In addition, the Occupational Health and Safety Committee discusses the safety-related targets, and, if needed, brings matters before the personnel and culture forum for discussion or vice versa. This ensures that the personnel's views and experiences are taken into consideration when assessing the achievement of the targets.

The personnel actively participate in the development of the activities and in identifying improvements through the annual personnel survey, for instance. We review the results of the survey separately for each team and prepare action proposals based on them for the Management Team to approve. We present the actions in the personnel and culture forum and at the personnel info sessions, and review them in our teams. We monitor the realisation of the actions over the course of the year, in connection with the personnel info sessions. We also review the personnel-related targets in orientation given to new employees, which strengthens the personnel's understanding and participation in the development of the activities.

Standards and commitments underlying the targets

Gasgrid's targets related to personnel are based on legal requirements and international voluntary commitments. In 2024, Gasgrid joined the UN's Global Compact and committed to promoting its ten principles, which apply to human rights, working life and the environment and anti-corruption. We have accounted for these principles especially when updating the Code of Conduct and sustainability programmes, and the targets related to personnel support the Global Compact's principles on working life, such as non-discrimination, safe working conditions and employees' rights to participate in development. In addition, the targets are based on national legislation, such as the Act on Equality between Women and Men and the Non-discrimination Act, the Occupational Safety and Health Act and the Occupational Healthcare Act, compliance with which is reflected in Gasgrid's personnel policy and training practices.

S1-6 – Characteristics of the undertaking's employees

The number of Gasgrid employees is presented in the table by gender, location and contract type. The information is based on information from the HR system, and partly on assessments. The reported figures are the number of persons, and they illustrate the situation on the last day of the reporting period. More detailed information on one person working under a non-guaranteed hours contract is protected for data protection reasons.

The number of employment relationships that ended in 2025 was seven. The average employee turnover was 5.6 per cent.

We primarily hire employees under permanent employment contracts. We issue fixed-term employment contracts only for a legitimate reason,

such as substitutions, traineeships, relieving work peaks, or projects that do not occur on a regular basis. We can agree on part-time work, for example, in connection with returning from parental leave or in connection with retirement, at the employee's own request. We do not issue non-guaranteed hours contracts without a legitimate need, and their use is always based on a contract between the employee and employer and the needs of the operations.

Thus, fixed-term and part-time employment contracts are based on individual needs and special business circumstances. The personnel policy, which is part of the company's Code of Conduct, is intended to offer stable and long-term employment contracts, and to enable flexible working time solutions and reconciliation of work and leisure.

Employee headcount by gender	Female	Male	Other	Not disclosed	Total
Number of employees	52	81	0	0	133
Number of permanent employees	51	76	0	0	127
Number of temporary employees	1	5	0	0	6
Number of non-guaranteed hours employees	-	-	-	-	1
Number of full-time employees	52	80	0	0	132
Number of part-time employees	0	0	0	0	0

Employee headcount by location	Espoo	Kouvola	Other location	Total
Number of employees	74	53	6	133
Number of permanent employees	72	49	6	127
Number of temporary employees	2	4	0	6
Number of non-guaranteed hours employees	-	-	-	1
Number of full-time employees	74	52	6	132
Number of part-time employees	0	0	0	0

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S1-7 – Characteristics of non-employee workers in the undertaking’s own workforce

Gasgrid’s own workforce does not include any agency workers, self-employed people or people provided by undertakings primarily engaged in employment activities.

S1-8 – Collective bargaining coverage and social dialogue

Gasgrid has operations only in Finland. Gasgrid’s collective agreements cover all personnel, with the exception of the Management Team. The employment terms and conditions are defined based on national collective agreements. Social dialogue takes place actively through, among other things, the personnel and culture forum, which discusses themes related to occupational well-being, OHS, management and developing competence. The collective bargaining coverage information is based on personnel data from the HR system.

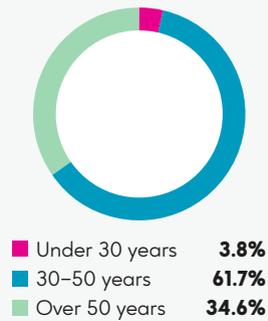
S1-9 – Diversity metrics

Gasgrid monitors the diversity of the personnel based on gender and age as part of its non-discrimination and equality work. The company regularly conducts pay surveys and personnel surveys through which we assess the realisation of representation and equality of different groups. At the end of 2025, the Group’s Management Team comprised both men and women, with the largest age groups being those aged 30–50 and over 50. The majority of the total personnel belonged to the 30–50-year age group, and the average age of our personnel was 45 years.

Number of employees at top management level	2025
Female	3
% of total at top management level	43
Male	4
% of total at top management level	57
Other gender	0
% of total at top management level	0
No data	0
% of total at top management level	0
Total	7

Employee breakdown	2025
Under 30 years old	5
Percentage of employees under 30 years old	3.8
Between 30 and 50 years old	82
Percentage of employees 30 to 50 years old	61.7
Over 50 years old	46
Percentage of employees over 50 years old	34.6

EMPLOYEE BREAKDOWN



S1-13 – Training and skills development metrics

Gasgrid invests in its personnel’s competence development by offering regular training and opportunities for professional growth. Developing competence covers both learning on the job and the strengthening of competence through training events and development discussions. We draw up a development plan for each employee every year, charting their training needs and agreeing on measures to develop competence. We keep track of the number of training hours and participation in training by gender and personnel group using the HR system. In 2025, the average number of training hours per employee was 19.6 hours.

Employee participation in training	Female	Male	Other	Not disclosed	Average
Average number of training hours per employee and (or) non-employee	23.2	17.4	0	0	19.6

S1-14 – Health and safety metrics

The occupational health and safety management system covers the whole of Gasgrid’s personnel. In the occupational health and safety (OHS) management system, the transmission network, LNG terminal and support function areas have been certified externally, and internal audits cover the whole organisation. The company focuses on preventive safety work and comprehensive risk assessment, as well as regular safety training. Taking care of safety is every employee’s responsibility. All personnel are covered by statutory occupational healthcare. We document and analyse workplace injuries, near-misses and observations systematically, and carry out corrective actions based on them in order to achieve continuous improvement of occupational safety.

Health and safety metrics	Employees	Non-employees
Percentage of own workers who are covered by a health and safety management system based on legal requirements and/or recognised standards or guidelines	100	-
Number of fatalities in own workforce as a result of work-related injuries and work-related illnesses	0	-
Number of recordable work-related injuries for own workforce	0	-
Rate of recordable work-related injuries for own workforce*	0	-
Number of fatalities as a result of work-related injuries and work-related illnesses of other workers working on undertaking’s sites	0	-
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related illnesses and fatalities resulting from illnesses	0	-

* See changes from previous periods in section BP-2.

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

Any information linked to discrimination incidents, harassment and other complaints related to non-discrimination in working life is collected at Gasgrid from the HR systems and internal whistleblowing channels. In 2025, no discrimination incidents were recorded in the company, and there are no complaints or human rights violations pending. Harassment incidents that come to the employer’s attention are taken seriously, and Gasgrid takes the necessary action to end and prevent the harassment. At Gasgrid, we have created guidelines for handling inappropriate behaviour, and we promote non-discrimination and equality actively throughout the organisation.

Number of cases, fines, and sanctions related to discrimination and human rights issues	2025
Total amount of fines, penalties, and compensation for damages as a result of incidents and complaints of discrimination	0
Number of severe human rights incidents connected to the undertaking’s workforce	0
Total amount of fines, penalties and compensation for severe human rights incidents connected to the undertaking’s workforce	0

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case

2,191

days without injuries demonstrates a commitment to safety culture

In 2025, we reached a key safety milestone as there were zero work-related injuries leading to absences among our personnel and contractual partners. As of 2020, the number of injury-free days comes to a total of 2,191. 2025 was the sixth year in a row without a single injury leading to the absence of our own personnel. During the reporting year, we recorded altogether three commuting accidents which did not lead to absences among our personnel and contractual partners. We reviewed and documented all of the incidents in our safety management system as part of the continuous development of our operations.

Using safety observations and inspections, we identified improvement areas, based on which we carried out corrective actions. Proactive risk management played a key role in maintenance and project safety work. In order to strengthen the safety culture, we arranged a wide range of training for both personnel and suppliers. Online courses and face-to-face teaching covered occupational safety, first aid and first-aid fire extinguishing, for example. A new course we introduced is an online course on office work safety. The online courses intended for suppliers supported safe work within the gas infrastructure.

Safety work is supported through regular internal management forums and the activities of the Occupational Health and Safety Committee, fostering personnel participation and continuous improvement. We also reviewed safety issues weekly together with the infrastructure maintenance service provider and through separate co-operation meetings. Systematic safety work, comprehensive training and active observations have enabled injury-free operations and reinforced the safety culture throughout the organisation. The 2025 results demonstrate the effectiveness of operational development and a strong commitment to safety at all levels.



“Ensuring occupational safety is the responsibility of all our employees.”

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Business conduct

The sustainability of Gasgrid’s business builds on strong corporate governance, the ethical principles laid down in the Code of Conduct and strategic risk management, which all set guidelines for the company’s decision-making and operational activities at all levels. We have identified the impacts, risks and opportunities related to business conduct as a part of our double materiality assessment, and they steer both the strategic planning and implementation of Gasgrid’s sustainability programme.

The material impacts are related to topics such as responsible corporate culture, the ethics of our supply chain and political engagement. The risks include the impact of accusations of greenwashing or unclear sustainability communication on the availability of financing and also the impact of political instability on the progress of strategic projects. We see reinforcing responsible corporate culture, which can enable financing solutions linked with ESG criteria and boost the company’s financial resilience, as an opportunity.

We have integrated the impacts and risks into Gasgrid’s business model by means of the Code of Conduct, Corporate Governance Policy, Risk Management Policy and sustainability programme, for example. These serve to ensure that responsible business practices support the implementation of the strategy and the continuity of business. The material topics related to business conduct are described in the table below.

Material topic	Description of sustainability matter	Classification of sustainability matter	Value chain location	Time horizon
Gasgrid’s impacts, risks and opportunities related to business conduct				
Corporate culture	› Value-based corporate culture and the Code of Conduct strengthen employee commitment and satisfaction, increase stakeholder trust, and support ethical and responsible conduct throughout the organisation.	+	●	M
	› Failure to achieve sustainability goals or ambiguities in sustainability communication can affect the availability and costs of financing.	R	●	L
	› Responsible corporate culture that builds on values and policies strengthens employee commitment and stakeholder trust. This can enable more affordable financing solutions, such as sustainability loans linked with ESG criteria, and improve the company’s financial resilience in the long term.	○	●	L

- ⊕ Positive impact ▲ Upstream ⊕ Short-term
- ⊖ Negative impact ● Own operations ⊕ Mid-term
- Ⓡ Risk ▼ Downstream ⊕ Long-term
- Opportunity

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Material topic	Description of sustainability matter	Classification of sustainability matter	Value chain location	Time horizon
Management of relationships with suppliers, including payment practices	> Gasgrid's Supplier Code of Conduct steers goods and service suppliers to adhere to responsible, safe, and ethical practices.	+	●	M
	> Shortcomings related to the origin of LNG and other transmitted energy, and the transparency of the supply chain can affect stakeholder trust and cause reputation and sustainability risks.	R	●	S
Political engagement and advocacy	> Gasgrid is dependent on political decision-making, and thus the company's strategic projects are exposed to regulatory changes and political uncertainty. Factors of this kind can affect the timing of investments, the availability of financing, and the predictability of the business environment.	R	●	M
	> Active political engagement and advocacy can promote the creation of a favourable regulatory and investment environment, which supports Gasgrid's strategic infrastructure projects related to renewable and low-carbon gases. This can improve the availability of financing channels and the conditions for business growth.	○	●	M
Entity-specific topic: Tax footprint	> Taxes and other public charges paid by Gasgrid	+	●	S M L

- ⊕ Positive impact
- ⊖ Negative impact
- R Risk
- Opportunity
- ▲ Upstream
- Own operations
- ▼ Downstream
- S Short-term
- M Mid-term
- L Long-term

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The following table shows a summary of the policies, goals, metrics and activities steering business conduct.

Material topic	Policies	Targets	Metrics	Actions
Gasgrid's policies, targets, metrics and actions related to business conduct				
Corporate culture	Code of Conduct, Corporate Governance Policy, Risk Management Policy	<ul style="list-style-type: none"> › Online policy course completed by entire personnel › The development of renewable gas markets through an effective and high-quality guarantee of origin system › Defining sustainability goals for projects 	<ul style="list-style-type: none"> › Number of course completions per number of employees › Initial response time to enquiries regarding guarantees of origin › Targets set, yes/no 	<ul style="list-style-type: none"> › Online course on policies introduced › Responding to customer enquiries regarding the guarantee of origin system within a period of three working days › Projects' sustainability goals drawn up
Management of relationships with suppliers, including payment practices	Code of Conduct	<ul style="list-style-type: none"> › Preparation of the Supplier Code of Conduct and suppliers' commitment to the code › Building a model for and starting supplier audits 	<ul style="list-style-type: none"> › Supplier Code of Conduct approval % › Supplier audits started 	<ul style="list-style-type: none"> › Updated Supplier Code of Conduct › Model for supplier audits built and audits started
Political engagement and advocacy	Code of Conduct	<ul style="list-style-type: none"> › Inclusive development work in all activities and consulting stakeholders in projects 	<ul style="list-style-type: none"> › Score in the Reputation&Trust survey 	<ul style="list-style-type: none"> › Participation in various events concerning the future of gases
Tax footprint	Code of Conduct, Corporate Governance Policy	<ul style="list-style-type: none"> › Producing tax footprint information 	<ul style="list-style-type: none"> › Amount of taxes paid 	<ul style="list-style-type: none"> › Tax footprint disclosed in the Sustainability Report › Reported to the Ministry of Finance

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G1-1- Business conduct policies and corporate culture

Business conduct policies

The policies steering Gasgrid’s business consist of the policies approved by the Board of Directors, which lay down the ethical and strategic basis for the company’s decision-making and operational activities. The Code

of Conduct, Corporate Governance Policy and Risk Management Policy specify the key approaches, responsibilities and goals for the various business areas, including corporate culture, supply chains, political engagement and tax footprint. These policies serve to ensure that Gasgrid operates sustainably, transparently and in a safe and secure manner, while also supporting

the implementation of Gasgrid’s strategy at all organisational levels. Monitoring takes place by means of internal control, audits and reporting. The contents of Gasgrid’s business conduct policies are presented in the table below.

Material topic	Policies	Key contents and target related to the material topic	Related impacts, risks and opportunities	How is it monitored?
Policies related to business conduct				
Corporate culture	Code of Conduct, Corporate Governance Policy, Risk Management Policy	<ul style="list-style-type: none"> › The Code of Conduct defines Gasgrid’s ethical principles, values and practices. The goal is to have responsible, safe and transparent operations in place. › The Corporate Governance Policy defines the company’s governance structure and the principles to be followed in governance. › The Risk Management Policy supports the continuity, management and development of operations. 	<ul style="list-style-type: none"> › Ethics, human rights, prevention of corruption, sustainability, reputation management 	<ul style="list-style-type: none"> › Internal control, whistleblowing channel, internal audit, Board supervision
Management of relationships with suppliers, including payment practices	Code of Conduct	<ul style="list-style-type: none"> › Suppliers are required to operate responsibly, comply with sustainability requirements and minimise environmental impacts. Procurements are put out to tender and suppliers are selected carefully. 	<ul style="list-style-type: none"> › Supplier risks, sustainability in the supply chain, safety, quality, human rights, prevention of corruption 	<ul style="list-style-type: none"> › Supplier assessments, audits, sustainability reporting, contract monitoring, whistleblowing channel
Political engagement and advocacy	Code of Conduct	<ul style="list-style-type: none"> › Influencing is based on facts, transparency and objectivity. Gasgrid participates in stakeholder forums and reports to the transparency register. 	<ul style="list-style-type: none"> › Social acceptability, transparency, stakeholder engagement risks, regulatory risks 	<ul style="list-style-type: none"> › Transparency register, reporting on website, stakeholder forums, monitoring by the Board
Tax footprint	Code of Conduct, Corporate Governance Policy	<ul style="list-style-type: none"> › Gasgrid is a major taxpayer and regularly reports its tax footprint as part of its financial and sustainability reporting. 	<ul style="list-style-type: none"> › Financial transparency, social responsibility, reputation, shareholder value 	<ul style="list-style-type: none"> › Monitoring by the financial unit, reporting to the Ministry of Finance and the Board, internal control

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Policies on the promotion of corporate culture

Gasgrid's corporate culture is based on the Code of Conduct, Corporate Governance Policy and Risk Management Policy, as well as the company's values: We work together, We build the future, and We acknowledge our responsibility. We promote operations in line with our values, for example, through inclusive management and development discussions. We actively involve personnel in planning operations and promoting corporate culture through, for example, the personnel and culture forum.

Another way of supporting the development of corporate culture is Gasgrid's sustainability programme, which includes targets such as a 100% completion rate for the online policy course, involving stakeholders in projects and defining project-specific sustainability goals. Metrics such as the stakeholder satisfaction score and the number of supplier audits help to monitor the achievement of the goals.

According to the personnel survey, employees mainly feel positively about Gasgrid as a work community, but due to the company's rapid growth, there is also a need for clearer roles and responsibilities, as well as stronger internal communication and leadership. Work atmosphere, well-being and managerial work remain at a good level, while the respondents recognise room for development, especially in workload management and clear decision-making.

Policies on the protection of whistleblowers

Gasgrid's practices for protecting whistleblowers are defined in the company's Code of Conduct and other specific policies. Gasgrid has a channel for reporting misconduct that aligns with the Whistleblower Directive (EU 2019/1937) and the national Whistleblower Act, and which has been in use since the company was established. Reports can be submitted anonymously, and the identity of the whistleblower is secured by technical means. The reporting channel is available both for internal and external stakeholders and accessible via Gasgrid's website. The whistleblowing channel has been implemented together with an independent and external partner. In 2025, Gasgrid did not receive any reports classified as reports of misconduct. Any reports of misconduct are reported to Gasgrid's Management Team every six months as part of the management's review of the management system. In addition, a summary of the reports is communicated to the Audit Committee and the Board of Directors.

The identity of a whistleblower remains secure throughout the process, and it is possible to make reports anonymously. The technical implementation of the system prevents the identification of whistleblowers to protect them from any retaliation and to safeguard their legal rights.

Gasgrid's sustainability programme and Code of Conduct require a thorough investigation of all reports of misconduct and, if necessary, corrective action. The company monitors and reviews the efficiency and effectiveness of the implemented measures and regularly reports on the results to the management and Board of Directors. A more detailed description of how the whistleblower reporting channel works, how the persons receiving the reports are appointed and trained, and how the reports are processed can be found in section S1-3.



“Our company culture is built on shared values developed together.”

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Actions and resources related to business conduct

The actions related to material topics are based on the company’s sustainability programme and the policies approved by the Board of Directors. The actions taken in the reporting year focused especially on the development of corporate culture, ensuring the responsibility of the supply chain, transparency of political engagement and transparent tax footprint reporting. The actions taken on each topic during the reporting year are disclosed in the table below. We regularly monitor the implementation and impact of the actions as part of management and reporting in our sustainability programme.

Actions related to business conduct are taken primarily by internal resources, but development projects also involve external costs. For example, introducing our online policy course required an external training service and translations. In addition, we further developed the guarantee of origin (GO) system for renewable gases, which involved system development work and input from specialists. We have set internal sustainability targets for the projects. To ensure the sustainability of the supply chain, we updated our Supplier Code of Conduct and initiated supplier audits, which entailed some costs for audit services. As regards political engagement and advocacy, we participated in various gas industry events and stakeholder dialogue, which entailed some costs, primarily participation fees and organising costs. We implemented the tax footprint reporting using internal resources. An external communication agency was hired to produce the annual report.

Material topic	Actions taken in 2025	Expected outcome
Actions related to business conduct		
Corporate culture	› Online course on policies introduced	› Conduct in accordance with policies and values throughout the organisation
	› Responding to customer enquiries regarding the guarantee of origin system within a period of three working days	› Satisfied customers
	› Projects’ sustainability goals drawn up	› Adherence to the company’s sustainability goals in projects
Management of relationships with suppliers	› Updated Supplier Code of Conduct	› Commitment of suppliers to established sustainability requirements and improvement in sustainability practices
	› Model for supplier audits built and audits started	› Development in the management of sustainability risks related to suppliers
Political engagement and advocacy	› Participation in various events concerning the future of gases	› Strengthening transparent and active stakeholder engagement as well as increasing awareness of the opportunities provided by the role of gases
Tax footprint	› Tax footprint disclosed in the Sustainability Report	› Increasing financial transparency for stakeholders
	› Reported to the Ministry of Finance	› Fulfilment of social responsibility and ownership steering obligations

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Business conduct goals

We have defined specific goals for the material topics as part of our sustainability programme and strategic management. The goals support a stronger

corporate culture, the development of the supply chain’s sustainability, and transparency in terms of our political engagement and tax footprint. The table below describes Gasgrid’s business conduct

goals and their outcomes in 2025. We systematically monitor the progress of the goals and update them to meet changes in the operating environment and stakeholders’ expectations as needed.

Material topic	Target	Target level and unit of measurement	Scope	Base year	Time horizon and milestones	Methods and assumptions	Outcome in relation to target
Business conduct goals							
Corporate culture	Online policy course completed by entire personnel	100% completion (relative)	Entire personnel	2025	Course publication in 2025	Introduction of the online course on policies, part of the management system	Course published in 2025, completion rate 80%
Management of relationships with suppliers	Supplier Code of Conduct drawn up and suppliers committed to it	Strategic suppliers committed (relative)	Strategic suppliers	2024	2025–2026	Procurement audit model built	The Supplier Code of Conduct document has been updated, 4 audits performed
Political engagement and advocacy	Inclusive development work and consulting stakeholders in projects	Score in the Reputation&Trust survey ≥ 80% in relation to the previous year (relative)	Stakeholders	2024	2025–2026	Communication activities, events (SuomiAreena, Hydrogen Week)	Events held, political engagement work ongoing
Tax footprint	Taxes are paid in accordance with Finnish laws and regulations	100% tax payment (absolute)	Entire Group	2024	Continuous	Monitoring in accordance with the sustainability programme and ownership steering	Taxes paid, no deviations

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G1-2 – Management of relationships with suppliers

Gasgrid aims at transparent, predictable and responsible relationships with suppliers. Gasgrid’s sustainability programme includes targets for developing the occupational safety culture and zero injuries. The company treats all goods and service suppliers equally, in a non-discriminatory fashion. Most of the significant suppliers have committed to Gasgrid’s requirements for suppliers.

We expect our partners to complete the relevant safety training and commit themselves to Gasgrid’s targets, such as zero accidents, environmental incidents, property damage incidents and supply interruptions. Gasgrid does not accept the use of child labour, forced labour or undeclared labour, and requires its partners to respect human rights.

Gasgrid has defined a target state and operating model for group procurement and the supply chain’s sustainability, with economic, social, environmental and ethical responsibility in mind. In 2025, the company developed a model based on supplier categories to support systematic supplier management and to prepare for a more international and more complex supplier base.

The supplier management model includes:

- > co-operation and meeting practices
- > sustainability audits before concluding a contract and during the contract term
- > systematic audit practices
- > supplier performance metrics, including incentives and penalties
- > the right to commission safety assessments
- > stricter data protection requirements in contracts.

The identification and management of supply-chain-related risks is supported by Gasgrid’s Risk Management Policy. The goals of risk management include improved capabilities in safety and security management and environmental management, as well as zero tolerance for environmental damage and serious safety deviations.

G1-5 – Political engagement and advocacy Oversight of political engagement and stakeholder co-operation

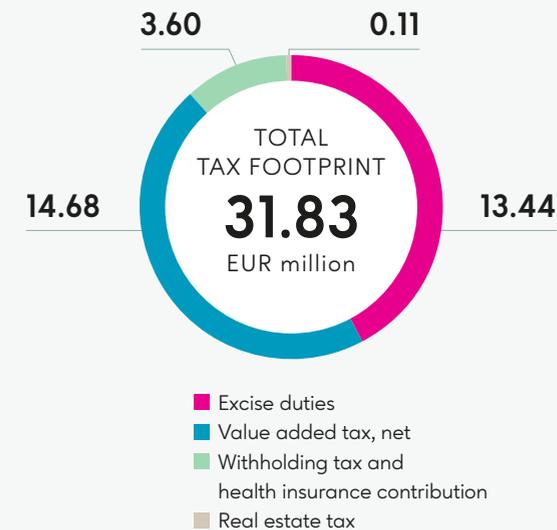
The oversight of the activities related to Gasgrid’s political engagement and stakeholder co-operation belongs to the Board of Directors, which is responsible for strategic development and the steering of business operations, and ensuring that the company complies with the relevant legislation, the Articles of Association and the state ownership steering policy. The Board of Directors maintains regular dialogue with the Ministry of Finance and ensures that the company has in place one or more forums for regular stakeholder co-operation, to discuss social and political views on topics such as the gas market and infrastructure. Gasgrid’s events are attended by many different stakeholders, ranging from authorities to shareholders, suppliers and social actors.

Gasgrid’s operations are regulated by the decision-making principles of the State of Finland, EU-level regulation, as well as the policies approved by the company’s Board of Directors, which also form the ethical basis for activities linked to political engagement and advocacy. The goal of stakeholder co-operation is to gather views on operational development and value creation, and also to provide information on the opportunities offered by renewable and low-carbon gases and the hydrogen economy in Finland. Gasgrid actively participates in development projects and strategy preparation with its stakeholders and openly communicates the role of the transmission infrastructure as an investment environment enabler.

The economic added value created by Gasgrid for its stakeholders increased

In compliance with our sustainability programme, we systematically monitor our tax footprint. Gasgrid has no foreign subsidiaries, and we pay all of our taxes in compliance with Finnish laws and regulations. We paid a net amount of EUR 14.68 million in value-added taxes and also remitted EUR 13.44 million in excise duties.

GASGRID’S TAX FOOTPRINT, EUR MILLION



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Entity-specific topics: Reliability of gas transmission and security of supply

Gasgrid's operations represent a significant component in the stability of Finland's energy system and its society's ability to function. The reliability of gas transmission and security of supply are the company's key social responsibilities, and by upholding these, we ensure that gas is available to our customers in all circumstances. The reliability of gas transmission supports the continuity of industry, households, and electricity and heat production, and

it is based on the skilled maintenance, supervision and operation of the transmission system. Security of supply, on the other hand, becomes critical especially in emergency conditions, in which Gasgrid acts as the transmission system operator and is responsible for the supply of gas to customers specified in terms of security of supply.

The company's role as an operator supporting security of supply entails both risks and strategic

opportunities. Any disturbances in the transmission system can jeopardise the reliability of gas transmission and reduce the stability of the energy system, whereas proactive preparedness and management of critical resources reinforce Gasgrid's status as a reliable partner. We have compiled the material impacts, risks and opportunities related to these topics in the table below.

Material topic	Description of sustainability matter	Classification of sustainability matter	Value chain location	Time horizon
Gasgrid's impacts, risks and opportunities related to reliability of gas transmission and security of supply				
Reliability of gas transmission	<ul style="list-style-type: none"> By ensuring the reliability of gas transmission, Gasgrid enables reliable gas supply to customers in a timely manner and at the correct pressure level. This supports the continuity and operational reliability of industry, households, and electricity and heat production. 	+	▼	Ⓢ
	<ul style="list-style-type: none"> Reliable gas transmission to customers is the key strength and competitive advantage of Gasgrid's business, ensuring a steady revenue stream and the maintenance of customer relationships. The company's ability to ensure a timely gas supply at the correct pressure level supports the continuity of customers' business and the stability of the energy system. This reliability reinforces Gasgrid's position as an operator of critical infrastructure and supports the long-term development of the business. 	⊙	▼	Ⓢ Ⓜ Ⓛ
Security of supply	<ul style="list-style-type: none"> Gasgrid plays an important role in the security of energy supply, providing gas transmission services to customers in the role of system operator during exceptional situations. As a company vital to the security of supply, Gasgrid has a direct impact on maintaining the security of supply of the entire society. 	+	●	Ⓜ
	<ul style="list-style-type: none"> Security of supply represents a strategic business opportunity for Gasgrid. As the gas transmission system operator with system responsibility, the company supports the continuity of society's critical functions also in emergency conditions. This position boosts the company's reliability and role in the national energy system, which can enable long-term co-operation, investments and financing as an operator vital for security of supply. 	⊙	▲ ▼	Ⓢ Ⓜ Ⓛ

- ⊕ Positive impact
- ⊖ Negative impact
- Ⓢ Short-term
- Ⓜ Mid-term
- Ⓛ Long-term
- Ⓡ Risk
- Ⓞ Opportunity
- ▲ Upstream
- Own operations
- ▼ Downstream

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A summary of policies, targets, metrics and actions that guide our gas transmission and security of supply, is presented in the table below.

Material topic	Policies	Targets	Metrics	Actions
Gasgrid's policies, targets, metrics and actions related to reliability of gas transmission and security of supply				
Reliability of gas transmission	Code of Conduct Risk Management Policy	<ul style="list-style-type: none"> › Continuous maintenance and development of reliable gas transmission › Investigations of supply interruption threats 	<ul style="list-style-type: none"> › Transmission reliability percentage › Number of supply interruption threats and investigation of all threats completed 	<ul style="list-style-type: none"> › Executed transmission network maintenance work and projects › Root cause analyses initiated for all supply interruption threats › Supply interruptions prevented through high-quality maintenance, supervision of operations and careful operation
Security of supply	Code of Conduct Risk Management Policy	<ul style="list-style-type: none"> › Gas system able to deliver sufficient transmission capacity to the market in terms of security of supply 	<ul style="list-style-type: none"> › Periods when both the Balticconnector offshore pipeline and LNG entry points are simultaneously out of service, hours per year 	<ul style="list-style-type: none"> › Preparedness and continuity management processes established, continuity risks identified, and personnel reserves updated › Functioning of mobile LNG regasification plants ensured › Engaged in collaboration with authorities and other stakeholders on security of supply

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Linking of the reliability of gas transmission and security of supply to the strategy and business model

The core of Gasgrid’s strategy and business model is to guarantee the reliability of gas transmission and security of supply in all circumstances. As the transmission system operator with system responsibility, the company provides services that enable the continuity of energy supply both under normal circumstances and emergency conditions. Reliable gas transmission is facilitated by professional transmission system maintenance, supervision and operations, and represents a key component of Gasgrid’s value proposition to customers, particularly industry, households, and electricity and heat production. In 2025, the reliability of gas transmission was 100 per cent, without a single unplanned supply interruption.

Security of supply, on the other hand, directly links to the company’s role as an infrastructure operator safeguarding society’s security of supply. Gasgrid’s

contingency planning covers both disturbances under normal circumstances and emergency conditions as stipulated in the Finnish Emergency Powers Act. The Inkoo LNG terminal and Balticconnector offshore pipeline function as parallel import routes, strengthening the reliability of gas transmission and security of supply.

The reliability of gas transmission and security of supply are not only operational goals. They are also strategic priorities that steer Gasgrid’s investments, risk management and stakeholder co-operation. They form the basis for the company’s value creation capacity for its customers and society as well as its ability to maintain trust in a changing business environment.

Policies related to the reliability of gas transmission and security of supply

Gasgrid’s reliability of gas transmission and security of supply are based on the company’s Code of

Conduct and Risk Management Policy. The goal is to guarantee the continued transmission of gas under all circumstances. In terms of gas transmission reliability, the focus is on preventing disturbances and securing the functional capacity of the transmission network, whereas security of supply is highlighted in emergency conditions, in which Gasgrid acts as the transmission system operator and is responsible for the supply of gas to customers who are protected in terms of security of supply. Both are key topics in terms of society’s ability to function and the stability of the energy system. We monitor successful implementation of the policies in line with the table below.

Material topic	Policies	Key contents and target related to the material topic	Related impacts, risks and opportunities	How is it monitored?
Policies and corporate culture related to reliability of gas transmission and security of supply				
Reliability of gas transmission	Code of Conduct Risk Management Policy	<ul style="list-style-type: none"> › The goal is 100% reliability of gas transmission for market participants › Prevention of disruptions and securing the functional capacity of the transmission network 	<ul style="list-style-type: none"> › Supply interruptions caused by technical failures, equipment malfunctions, and wear and tear of the transmission network › Reputation and contractual risks 	<ul style="list-style-type: none"> › Root cause analysis, maintenance, supervision of operations, reporting and analysis of disruptions
Security of supply	Code of Conduct Risk Management Policy	<ul style="list-style-type: none"> › Ensuring the proper functioning of gas infrastructure under all conditions › Preparation for crisis situations and supporting society’s ability to function 	<ul style="list-style-type: none"> › Geopolitical risks, hybrid influence, crisis situations › Impact on society’s ability to function and continuity of energy supply 	<ul style="list-style-type: none"> › Contingency planning, corporate security forum, crisis management, continuity management, co-operation with authorities

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Actions and resources related to the reliability of gas transmission and security of supply

Gasgrid’s actions related to the reliability of gas transmission and security of supply form a key component of the company’s strategic risk management and social responsibility. The actions implemented in the reporting year will improve uninterrupted gas transmission and preparedness for crises. As regards the reliability of gas transmission, our focus was on the maintenance of the transmission network, and carrying out root cause analyses to prevent supply interruptions. In terms of security of supply, the key actions include contingency measures such as management of the critical spare parts, operation of the LNG terminal and co-operation with authorities.

The actions aim at positive impacts on society’s ability to function and the stability of the energy system. The following table shows the actions related to the reliability of gas transmission and security of supply, and the expected outcomes.

As maintaining reliable gas transmission is one of Gasgrid’s main tasks, it requires substantial investments and continuous operating expenses. In 2025, we carried out maintenance and modification projects on the transmission network as well as preventive maintenance, including procurements of equipment and materials, and connection work for the pipeline modifications. Supervision of operations and gas transmission monitoring constitute a significant share of operating expenses. The aim of these actions is to ensure 100% transmission reliability and prevent unplanned interruptions in the gas supply.

As regards security of supply, we have improved our contingency and continuity management processes and identified risks. The LNG terminal is a key component of

energy security and reliability, and it involves controlled and predictable lease, maintenance and contingency costs. Moreover, costs result from maintenance work, safety improvements, contingency arrangements, as well as from specialist services used in connection with developing continuity management, for example. All

of this serves to ensure an uninterrupted supply of gas in all circumstances, which requires both substantial long-term investments (CapEx) in the infrastructure and continuous operating expenses (OpEx) related to network management and contingency measures.

Material topic	Actions taken in 2025	Expected outcome
Actions related to reliability of gas transmission and security of supply		
Reliability of gas transmission	› Transmission network maintenance work and projects executed	› Maintaining the reliability and functionality of the gas transmission network as well as reducing methane emissions
	› Root cause analyses initiated for all supply interruption threats	› Reducing the risks of supply interruption and threats through root cause analysis
	› Supply interruptions prevented through high-quality maintenance, supervision of operations and careful operation	› Ensuring the reliability of gas transmission and preventing unplanned supply interruptions, 100% reliability of gas transmission
Security of supply	› Preparedness and continuity management processes established, continuity risks identified, and personnel reservations updated	› Ensuring and developing the security of supply and functional capacity in emergency situations through continuity management processes and risk management
	› Functioning of mobile LNG regasification plants ensured	› Ensuring the supply of gas in exceptional situations
	› Engaged in collaboration with authorities and other stakeholders on security of supply	› Development and promotion of security of supply activities through continuous stakeholder dialogue and co-operation

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Targets related to the reliability of gas transmission and security of supply

Gasgrid’s targets for the reliability of gas transmission and security of supply are based on the Code of Conduct, Risk Management Policy and sustainability programme. We have set targets for securing the continuity of gas transmission in all circumstances

and for ensuring society’s ability to function even in emergency conditions. The following table illustrates the targets related to the reliability of gas transmission and security of supply and their outcomes in 2025. We systematically monitor the progress of the goals and update them to meet changes in the operating environment and stakeholders’ expectations as needed.

Material topic	Target	Target level and unit of measurement	Scope	Base year	Time horizon and milestones	Methods and assumptions	Outcome in relation to target
Targets related to reliability of gas transmission and security of supply							
Reliability of gas transmission	Continuous maintenance of reliable gas transmission	100% reliability of gas transmission, no unplanned interruptions (relative)	Entire transmission network, Finland	Annual goal	Annual	Supervision of operations, maintenance, root cause analyses	100% achieved, no unplanned supply interruptions
Security of supply	Ensuring security of supply in all conditions	Zero crisis-related supply interruptions (absolute)	Entire transmission network, LNG terminal, Finland	Annual goal	Annual	Contingency plan, co-operation with authorities	Zero interruptions and entry points simultaneously out of service for zero hours

Security of supply	2025
Number of unplanned supply interruptions	0
Number of planned supply interruptions	13
Amount of energy not transmitted during planned interruptions (GWh)	0.013
Energy not transmitted during planned interruptions (%)	0.00010
Number of incidents that could have led to a supply interruption	6

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Other sustainability information to be reported

Waste and air emissions

According to Gasgrid's double materiality assessment, the sustainability topics E2 Pollution and E5 Resource use and circular economy are not material to our company. Due to this, we have not included data complying with the disclosure requirements of the E2 and E5 standards in this report. However, we have reported the data we have compiled on these topics in order to meet other reporting requirements.

Waste

Gasgrid complies with the Finnish Waste Act, Government decrees on waste and municipal waste management regulations. When processing waste, we comply with the order of priority laid down in the Waste Act: the first priority is prevention, secondarily, waste is prepared for reuse, the third option is recycling, the fourth one is other recovery (for example energy recovery), and the last resort is disposal. Hazardous waste is stored in separate, locked and covered areas, and its transport and processing takes place in co-operation with specialist partners. We annually report the waste generated at the sites requiring environmental permits to the supervisory authority.

Gasgrid has not set specific metrics or targets for waste, as its volume varies annually depending on the nature and quantity of the realised projects.

Gasgrid's operations generate both non-hazardous and hazardous waste. The non-hazardous waste includes categories such as energy waste, recycled paper, biowaste, metal and mixed waste. The hazardous waste includes waste electrical and electronic equipment (WEEE), heavy metal batteries and other batteries, waste oil, chemicals, fluorescent lamps, polluted soil and oil waste from natural gas. Hazardous waste quantities are small, and they are collected annually from Gasgrid sites.

Waste outflows	Hazardous waste	Non-hazardous waste	Total
Waste generated (t)	75	107	183
Diverted from disposal (t)	62	107	169
Directed to disposal (t)	13	0	13

Air emissions

Combustion of gas does not generate sulphur dioxide or particulate emissions. The LNG terminal generates nitrogen oxides in connection with the regasification and compression of LNG. The transmission network generates nitrogen oxides during gas combustion, heating and compression operations. Furthermore, the combustion of fuel oil in the standby power plants generates NO_x emissions. The LNG terminal is the most significant of these emission sources. The sites requiring environmental permits annually report their air emissions to the supervisory authority. In 2025, the NO_x emissions amounted to 240 tonnes.

The main factor affecting the NO_x emissions of the LNG terminal is the volume of transmitted gas, which is why Gasgrid has not set an absolute annual emission reduction target. The gas transfer volume, in turn, depends on the customers' market operations and the annual temperature conditions. Other factors impacting emissions include the age and technology of the terminal vessel.

Incidents of corruption or bribery

No indictments for non-compliance with anti-corruption or anti-bribery legislation were issued against Gasgrid Group during the reporting period. The company was also not fined for any such breaches. There have been no cases of corruption at Gasgrid during previous reporting periods either.

Gasgrid has a zero-tolerance policy for corruption and bribery. The employees are not allowed to accept or offer any business gifts or benefits exceeding what is customary and reasonable. Any reports of misconduct will be investigated appropriately and will result in corrective action as each case requires.

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E1-5		68–69	
E1-6	x, Scope 1 emissions	69–70	Assurance for Scope 1 emissions: 44 a, 48 a, 48 b

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G1 - Business conduct

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Disclosure requirement	Assurance	Page number	Additional information
Social information: ESRS S1 - Own workforce			
ESRS 2, SBM-2		54	
ESRS 2, SBM-3		72-73	
S1-1		75-76	
S1-2		77	
S1-3		77-78	
S1-4		79-81	
S1-5		82-83	
S1-6	x	83	Assurance: 50 a, 50 b, 50 c, 50 d, 50 d i, 50 d ii, 50 e, 51
S1-7		84	
S1-8		84	
S1-9		84	
S1-13		84	
S1-14	x	85	Assurance: 88 a, 88 b, 88 c, 88 d, 88 e, 89, 90, AR81
S1-17		85	
Governance information: ESRS G1 - Business conduct			
ESRS 2, IRO-1		59	
G1-1		91-92	
G1-2		95	
G1-5		95	

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Disclosure requirement	Assurance	Page number	Additional information
Entity specific disclosures			
Reliability of gas transmission	x	97-101	Assurance: Number of unplanned and planned supply interruptions, amount of energy not transmitted during planned interruptions, transmission reliability %, threats of interruptions, energy not transmitted
Security of supply		97-101	
Other sustainability information to be reported			
Waste		102	
Air emissions		102	
Incidents of corruption or bribery	x	102	Assurance: G1-4 24 a

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Independent assurance report on sustainability information

(Translation of the Finnish original)

To the Management of Gasgrid Finland Oy

Scope of assurance

At the request of the management of Gasgrid Finland Oy (hereinafter also referred to as the “Group” or the “Company”) (3007894-1), we have performed a limited assurance engagement regarding the sustainability information specified in more detail below.

Subject of assurance

The assurance covers the Group’s sustainability information (hereinafter “Sustainability Information”) included in the sustainability report presented as part of the annual report and specifically defined in the sustainability report’s preparation principles, for the reporting period from January 1 to December 31, 2025. The information in the sustainability report subject to verification is listed in the ESRS index table (pp. 103-105 of the annual report).

Conclusion

Based on the procedures we performed and the evidence we obtained, nothing has come to our attention that causes us to believe that the Group’s sustainability information included in the sustainability report, specifically identified above, for the reporting period January 1–December 31, 2025, does not comply, in all material respects, with the Reporting Criteria defined below.

Basis for conclusion

We performed the assurance of the sustainability information as a limited assurance engagement in compliance with 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 described in more detail in the section “Our responsibilities”.

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

Other matter

We draw attention to the fact that the Group’s Sustainability Report has been prepared, and assurance has been provided for it for the first time in accordance with the Reporting Criteria described in the “Management’s Responsibilities” section for the reporting period from January 1 to December 31, 2025. Our conclusion does not cover the comparative information that has been presented in the sustainability report.

Independence and quality management of the assurance provider

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 have applied the international quality management standard ISQM 1, which requires an 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 group management

The management of Gasgrid Finland Oy is responsible for the preparation and presentation of the sustainability information in accordance with the

reporting criteria, being the Company’s reporting instructions and accounting principles, and, to the extent described therein, the European Sustainability Reporting Standards (ESRS) (hereinafter referred to as the “Reporting Criteria”). Management is also responsible for such internal control as it determines is necessary to enable the preparation of sustainability information that is free from material misstatement, whether due to fraud or error.

Inherent limitations in the preparation of sustainability information

Preparing sustainability information requires the company to conduct a materiality assessment to identify relevant topics for reporting. This involves a significant degree of management judgment and decision-making. It is also characteristic of sustainability information that reporting this type of data involves estimates and assumptions, as well as measurement and estimation uncertainty.

Our responsibilities

Our responsibility is to perform an assurance engagement to obtain limited assurance about whether the Sustainability Information is free from material misstatement, whether 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 of users taken on the basis of Sustainability Information.

Compliance with the International Standard on Assurance Engagements ISAE 3000 (Revised) requires that we exercise professional judgment and maintain professional skepticism throughout the engagement.

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We also:

- › Identify and assess the risks of material misstatement of the 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 Group's internal control.
- › Design and perform assurance procedures responsive to those risks to obtain evidence that is sufficient and appropriate 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.

Procedures performed

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. The nature, timing and extent of assurance procedures selected depend on professional judgment, including the assessment of risks of material misstatement, whether due to fraud or error.

The procedures performed in a limited assurance engagement are primarily inquiries and analytical procedures. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our procedures included the following:

- › an assessment of the appropriateness of the defined framework, accounting principles, and presentation,
- › interviews with company management and with personnel responsible for collecting sustainability data regarding data collection and processing methods,
- › reconciliation of the reported data with supporting calculations and other supporting documentation,
- › assessment of the accuracy of the data and audit calculations, and
- › site visits to two different locations.

Helsinki, 19th March 2026

Oy Tuokko Ltd
Audit Firm

Mari Jukarainen
APA

SUSTAINABILITY REPORT

General

E1 - Climate change

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Assurance report

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