



CONSTI

CONSTI PLC
SUSTAINABILITY
REPORT

20
24

1 GENERAL INFORMATION

1.1 Principles of preparation

1.1.1 Principles of preparing the sustainability report (BP-1, BP-2, IRO-2)

Basic information

Consti Plc (Consti) is one of the leading companies in Finland focused on renovation contracting and technical building services. Consti offers a comprehensive range of renovation and technical building services, as well as selected new construction services, to housing companies, corporations, investors, and the public sector. Consti has offices in Helsinki, Tampere, Turku, Lahti, Hämeenlinna, Oulu, and Jyväskylä.

The parent company of the group is Consti Plc. Operations are divided into four business areas: Housing Companies, Corporations, Public Sector, and Building Technology. Business is conducted in subsidiaries wholly owned by the parent company. The sustainability reporting covers the entire group, i.e., all subsidiaries, and the Scope of consolidation is the same as in the financial statement. The reporting period for the annually published sustainability report is the same as in financial reporting, i.e., the calendar year.

Basis of preparation

This sustainability report has been prepared in accordance with the EU Corporate Sustainability Reporting Directive (CSRD) and the Finnish Accounting Act, using the European Sustainability Reporting Standards (ESRS) required by the directive. The EU Corporate Sustainability Reporting Directive applies to large companies operating in regulated markets in the EU from the financial year 2024 onwards.

Consti has published a corporate sustainability report on its operations since 2014. The reporting has used the Global Reporting Initiative (GRI) standards and guidelines at the reference level since the financial year 2020. In addition, Consti has reported non-financial information in accordance with EU regulations (Non-Financial Reporting Directive, NFRD) as part of the Board of Directors report.

Consti identified the following as material topics for impact

materiality: Climate Change, Circular Economy, Own Workforce, Workers in the Value Chain, and Business Conduct. For financial materiality, the material sustainability topics identified were Climate Change, Own Workforce, Workers in the Value Chain, and Business Conduct.

The materiality analysis is described in section 1.4.1.

This sustainability report examines Consti's value chain from suppliers and other partners to customers and end-users. Consti has identified the workers of the value chain, particularly the providers of construction services used by Consti, as a material sustainability theme. Consti has recognised that industrial manufacturers and suppliers are also part of its value chain. However, at this stage, Consti does not yet have fully effective means to examine the early stages of the entire value chain. Consti aims to use established and extensively operating companies in its procurement, which in their operations assure to operate according to sustainable business principles. The most significant suppliers in Consti's procurement chain for services include contractors specialising in building technology, demolition, and complementary structures, as well as construction equipment rental companies. For material procurement, the largest players are domestic large wholesale and central purchasing organisations, as well as major domestic manufacturers of building materials and products.

The sustainability report does not cover the production of construction materials at the beginning of the value chain.

The Scope 3 calculation results presented in the sustainability report include greenhouse gas emissions from the beginning of the value chain. In the end of the value chain emission categories the end-use of sold products and services and the disposal of sold products are also included in Consti's Scope 3 calculation. The value chain is presented in the figure below.

Consti has not used the option to omit information related to intellectual property, know-how, or the results of innovation in its reporting. Consti has not used the option under Articles 19a(3) and 29a(3) of Directive 2013/34/EU to omit information related to ongoing development or negotiations. Consti has used the option for internal references in the statement.

The sustainability report and related claims have been assured (limited assurance) by an independent third party, KPMG Oy Ab, in accordance with its assurance report.

The data points reported in accordance with the ESRS standard and their locations within the sustainability report are presented in the indices published at the end of this report: 5.1 Indices of Disclosure Requirements Content Index 1, and 5.2 Content index 2: Data points resulting from other EU legislation. The indices also outline any deviations and provide relevant clarifications.

The monetary amounts presented in this report are in euros.

1.1.2 Risk management and internal control in sustainability reporting (GOV-5)

Consti's sustainability reporting follows the group's common principles and processes for risk management and internal control.

The identified risks in sustainability reporting are the accuracy and completeness of the reported information and the timeliness of the reporting. To ensure the accuracy and timeliness of the information, Consti has defined a sustainability reporting model that defines the roles and responsibilities for monitoring and reporting sustainability issues. The accuracy and completeness risks are mainly related to the availability of value chain information and the accuracy of estimation.

The implementation of sustainability reporting is the responsibility of Consti's Director of Legal and Compliance, supported by the group's finance department and Sustainability Manager.

According to Consti's operating model, the management of business areas and support functions are responsible for the accuracy and transparency of the information reported from their areas of responsibility. The reported information is collected from the group's common information systems, suppliers or their reporting systems, or public sources.

Consti's internal controls, which are part of common business processes and systematically monitored as part of the reporting of business units and the group's Management Team, are used to ensure the accuracy and timeliness of the reported content.

1.2 Governance and strategy of sustainability

1.2.1 Role of governance, management, and supervisory bodies and the information provided to them and the sustainability issues they handle (GOV-1, GOV-2, SBM-1)

Sustainability governance

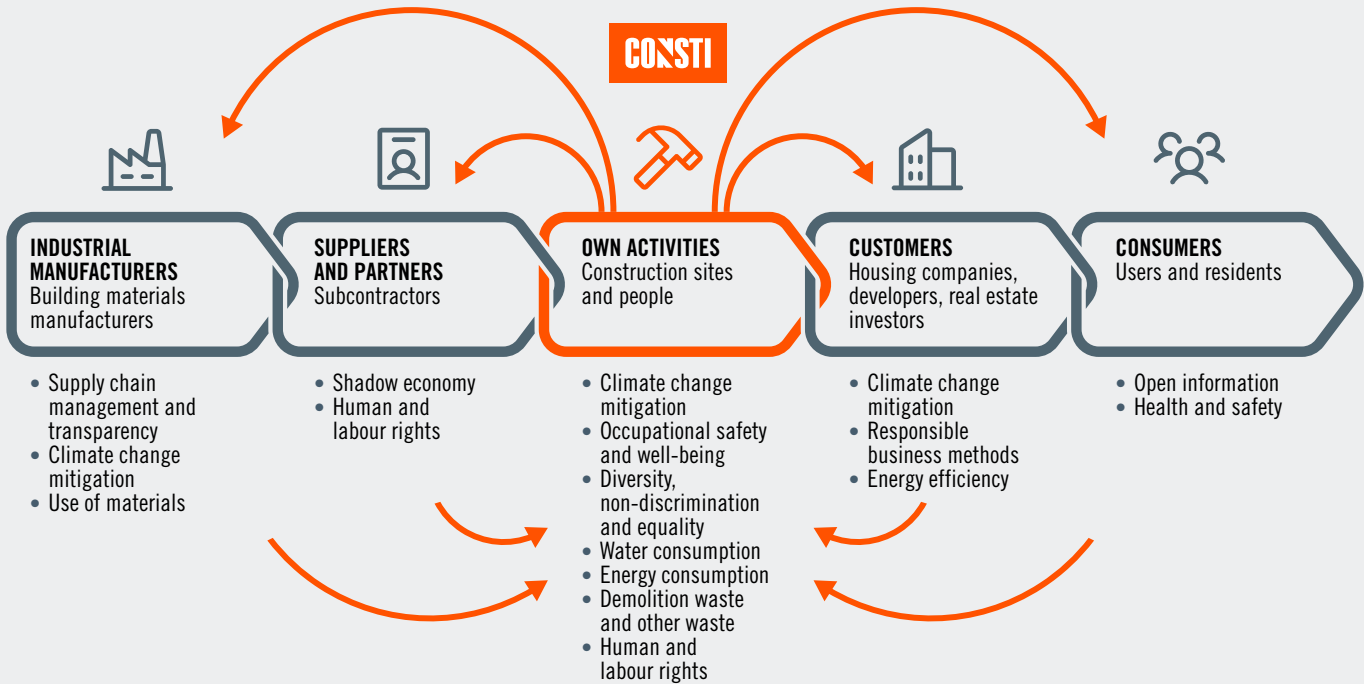
Sustainability is part of business management at Consti, led by the group's CEO with the assistance of the Management Team. The sustainability themes and objectives that are material to the company for the strategy period are presented by the Management Team and approved by the Board. The sustainability goals are based on Consti's strategy and materiality analysis of sustainability issues. In addition to the strategy period goals, goals are set for the financial year.

The group's Management Team defines the guidelines and actions related to sustainability. The group's Management Team is responsible for implementing the decisions. The Board monitors sustainability risks as part of the company's risk management. The entire Board is responsible for monitoring impacts, risks, and opportunities. The names and experience of the Board Members are described in the section "Board" of this chapter.

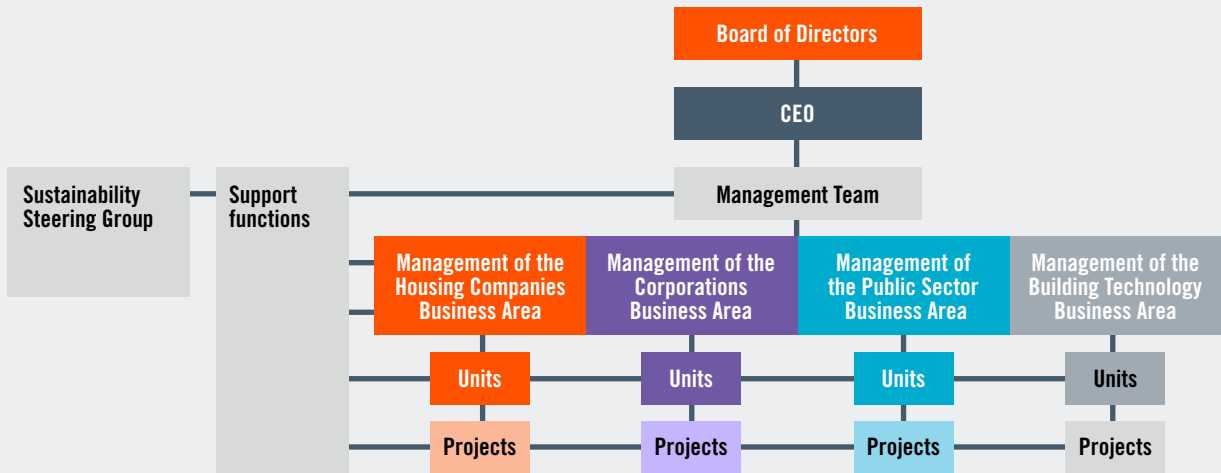
Sustainability development is coordinated by the Corporate Sustainability Steering Group, consisting of the CEO and representatives of support functions. Its key tasks are to coordinate the development of sustainability work, plan actions to implement sustainability themes, and monitor the general development of corporate responsibility and the requirements set for companies. The Steering Group meets regularly, and its term is the strategy period. In addition, a person has been appointed for the environmental theme to coordinate practical sustainability work in working groups consisting of representatives of the business areas. The responsibility for the groups' activities, coordination, and reporting to the Management Team at the group level belongs to the Chair of the Corporate Sustainability Steering Group. The Chair is the group's Director of Legal and Compliance.

The means of managing sustainability-related impacts, risks, and opportunities are described thematically in the chapters on the environment, social responsibility, and governance.

Consti's value chain



Sustainability governance at Consti



Board

The Board of Consti Plc is the highest authority responsible for sustainability in the company, and it approves the key principles and plans and guidelines that steer the company's operations and internal control. The key plans and guidelines relating to responsibility and sustainability are the ethical guidelines for employees and partners, insider guidelines, disclosure policy, environmental principles, occupational safety principles, guidelines for compliance with competition law, and the equality and non-discrimination plan.

The Board approves the company's sustainability goals as part of the company's strategy and monitors the achievement of the goals as part of the strategy implementation monitoring. The Board is informed of any sustainability deviations and misconduct, such as serious work accidents, corruption and bribery suspicions, and other significant events contrary to the company's policies or guidelines. The Board handles other sustainability-related issues and consults the company's internal responsibility experts as needed. The Board handles and approves the sustainability report published as part of the Board of Directors Report.

The Board of Consti met 12 times during the financial year 2024 and addressed the following sustainability topics in its meetings:

- Approved the group strategy for 2024-2027, including the sustainability themes related to the strategy.
- Addressed and approved the group's sustainability projects for the strategy period 2024-2027.
- Addressed the content of the training related to the development of occupational safety processes.
- Addressed and approved the content of the human rights management process.
- Addressed the description of compliance content and the preliminary preparation schedule for the sustainability report.
- Addressed strengthening guidelines regarding insiders, disclosure policy, and business operations, strengthening the risk management process, as well as the key content and preparation schedule of the sustainability report
- Addressed and approved the principles and guidelines for business operations.
- Addressed and approved the human rights principles.
- The Board addressed the HR function's strategic projects, including topics related to employee competence and leadership development, as well as safety development projects.
- The Board discussed occupational safety and HR issues monthly.

The Board Members

At the end of 2024, the Board of Consti Plc had six members. Two of them, or 33.3 percent, were women, and 66.6 percent were men. All members were independent of the company and its significant shareholders.

PETRI RIGNELL

Chairman
Member of the Nomination and Compensation Committee

MSc. (tech.), born 1962
Board Member since 2008
Finnish citizen
Independent of the company and of significant shareholders

Key work experience

Kreate Oy, CEO 2016–2017
IVG Polar Oy, CEO 2010–2013
CapMan Real Estate, Industrial Advisor 2007–2010
Projektikonsultit Oy, CEO 1994–2007
Polar Yhtiöt, Foreman 1989–1994
Lemminkäinen Oy, Project Engineer 1985–1989

Key positions of trust

Nordec Oy, Chairman of the Board since 2021
Kreate Oy, Chairman of the Board since 2017
Setera Communications Oy, Member of the Board since 2017
PriRock Oy, Chairman of the Board since 2007

Consti Plc's shares through his holding company 25,100
(31 December 2024)

ERKKI NORVIO

Board Member
Chairman of the Nomination and Compensation Committee

MSc. (tech.), M.Sc. (econ.), born 1945
Board Member since 2008 (Chairman 2008–2011)
Finnish citizen
Independent of the company and of significant shareholders

Key work experience

Ramirent Plc, CEO 1986–2005 and Deputy CEO 1984–1985
Partek Oy, 1972–1984

Key positions of trust

CableCrew Oy, Board Member since 2022
Norvier Oy, Chairman of the Board since 2007

Consti Plc's shares through his holding company 106,463
(31 December 2024)

ANNE WESTERSUND

Board Member

M.A. studies, translator degree, born 1964
Board member since 2019
Finnish citizen
Independent of the company and significant shareholders

Key work experience

Rokmind Oy, Partner since 2018
WesAnne Oy Ab, CEO since 2017
Cargotec Oyj, SVP Head of Customer Value Programme 2015–2017, SVP Communications and Public Affairs 2013–2015, VP Communications and Marketing 2010–2013
Vattenfall AB, VP Communication Nordic 2005–2010
Vattenfall Oy, Customer Service Director 2002–2005
Silja Line, Marketing Manager 2000–2002

Key positions of trust

Hurrikaanit Group Oy, Board Member since 2022
Rokmind Oy, Chairman of the Board since 2019
Oy Hedengren Ab, Board Member since 2018

Consti Plc's shares through her holding company 2,000
(31 December 2024)

JOHAN WESTERMARCK

Board Member

Lic.Sc. (Econ.), M.Sc (Tech.), born 1965
Board Member since 2020
Finnish citizen
Independent of the company and of significant shareholders

Key work experience

Bittium Corporation, CEO, since 2023
Citec Group Oy Ab, CEO, 2017–2022
Maintpartner Group Oy, CEO, 2012–2017
Maintpartner Oy, CEO, 2010–2012
Maintpartner Ab, CEO, 2009–2010
Eltel Group Oy, VP, Business Development, 2007–2008
Eltel Networks GmbH, CEO, 2006–2007
Eltel Group Oy, VP, Business Development, 2004–2006
Elcoteq Oyj, VP, Sales and Marketing, 2001–2004
Ahlstrom Machinery Oy: Regional Director, Service Business 1997–2001, Manager, Marketing Development 1995–1997, Project Engineer 1992–1995

Does not own Consti Plc shares (31 December 2024)

JUHANI PITKÄKOSKI

Board Member
Member of the Nomination and Compensation Committee

LL.M, born 1958
Board Member since 2022
Finnish citizen
Independent of the company and significant shareholders

Key work experience

Caverion Corporation, CEO 2013–2014
YIT Corporation, CEO 2008–2013, in various management positions 1994–2008
Oy Huber Ab, Director of the Factory Service Unit 1991–1994, Attorney at Law 1988–1991

Key positions of trust

Saimaa Group Oy, Board Member since 2023

Consti Plc's shares 2,000 (31 December 2024)

KATJA PUSSINEN

Board Member

MSc (Econ and Bus Admin), BBA, Born 1975
Board member since April 2024
Finnish citizen
Independent of the company and of significant shareholders

Key work experience

Kreate Ltd, HR Director since 2019
Kreate Ltd, HR Manager 2017–2019
Skanska Ltd, HR Manager 2013–2016
Soraset Ltd, HR and Office Manager 2006–2012

Does not own Consti Plc shares (31 December 2024)

Board Committees

The Board has formed a Nomination and Remuneration Committee from among its members. The tasks of the Nomination and Remuneration Committee are defined in the written rules of procedure approved by the Board. The committee's tasks include preparing the forms of remuneration and incentive systems for senior management and all employees and approving their key principles.

CEO and Management Team

The CEO of Consti is responsible for implementing sustainability measures in accordance with the goals and strategy approved by the Board. The CEO reports to the Board on material impacts, risks, and opportunities related to sustainability and the progress of sustainability goals as needed and provides the Board with a sustainability review and a separate environmental review once a year, alone or together with the company's sustainability experts. In addition, the CEO presents an occupational safety review at all Board meetings according to the Board's annual calendar.

The Management Team prepares sustainability-related matters to be presented to the Board and monitors the implementation of approved sustainability measures and the impacts, risks, and opportunities related to sustainability regularly in its meetings. The Management Team also approves group-level guidelines that complement the principles approved by the Board, such as information security, accident investigation, and personal data processing.

The Director of Legal and Compliance, who is a member of the Management Team, is responsible for business compliance and sustainability reporting. The Director of Legal and Compliance is the Chair of Consti's Sustainability Steering Group and reports on sustainability themes and measures to the rest of the Management Team quarterly or as the theme's timeliness requires. Consti's corporate responsibility experts provide the Management Team with a sustainability review twice a year.

Sustainability risks and related internal control are addressed in the Management Team when the matters require handling or decisions. The Management Team addresses reviews related to HR and occupational safety in all its meetings, and addresses reviews related to e.g., the environment, energy, information security, and compliance as needed, if the matters require handling or a decision.

Business Area Directors are responsible for ensuring that the sustainability principles and goals defined by the company are integrated into the daily work of employees and that the suppliers, customers, and other partners used by the company operate according to Consti's sustainability principles.

Board Members' expertise in sustainability

The Board Members of Consti have years of experience in business related to the company's business areas through operational or trust positions. The Board can obtain external expert assistance in sustainability matters if necessary. The Board has participated in training organised for the Board on, for example, CSRD requirements. The Board Members and their experience are presented in section 1.2 *Governance and strategy of sustainability*, under "Board Members".

The Board Members receive information on sustainability issues as needed through sustainability reviews and regular reviews on, for example, occupational safety, as well as through the annual sustainability report.

Corporate governance

Consti's business and governance responsibility are guided by the Finnish Companies Act and Securities Market Act, as well as other legislation applicable to Consti, Consti Plc's articles of association, the values and ethical principles approved by the company's Board, and the rules and guidelines of Nasdaq Helsinki Oy applicable to listed

companies. In insider matters, Consti complies with the EU Market Abuse Regulation and the regulations issued under it. Consti complies with the Corporate Governance Code prepared by the Finnish Securities Market Association for listed companies, which is available at www.cgfinland.fi. Consti is part of the Reliable Partner programme maintained by Vastuu Group Oy.

Consti's governance is the responsibility of the Board and the CEO. The company's auditor is responsible for external auditing.

At Consti, the primary responsibility for internal control lies with the line management, supported by the group's support functions. The purpose of internal control is to protect the company's resources from misuse, ensure the proper authorisation of business transactions, and ensure the reliability of financial and sustainability reporting. Consti does not have a separate internal audit function, but the responsibilities of internal audit are divided within the company among different bodies and business areas. The external auditor's audit plan takes into account that the company does not have a separate internal audit function.

1.2.2 Incorporating sustainability performance into incentive systems (GOV-3)

Shareholders decide annually on the Board's remuneration at the general meeting in accordance with the remuneration policy and applicable legislation. The proposal for the Board's remuneration is prepared by the Board's Nomination and Remuneration Committee. The Board's remuneration at Consti is not tied to the company's performance.

The Board approves the CEO's salary and remuneration, as well as the principles and metrics applied to the remuneration of other members of the Management Team and the CEO. The Board monitors and evaluates the implementation of remuneration annually. The CEO, together with the Chair of the Board, decides on remuneration matters concerning other senior management in accordance with the principles and guidelines approved by the Board.

The sustainability goals of the CEO's incentive system are the successful implementation of Consti's strategy for 2024-2027, including the promotion of responsibility and lean principles, improving accident frequency rates, and promoting an occupational safety culture. In the CEO's incentive system, (STI) the share of the performance bonus can be up to 60 percent of the annual base salary. The share of sustainability-related goals in 2024 was 24 percent of the annual base salary, including the successful implementation of the strategy. The strategy and its sustainability goals are described in sections 1.2.3 and 1.4.4 of this chapter.

The sustainability goals included in the operational goals of other Management Team members depend on the member's area of responsibility, including CSRD reporting, ensuring the accuracy and correctness of reporting, the successful implementation of the strategy for 2024-2027, including the promotion of corporate responsibility and lean principles, and improving accident frequency rates and promoting an occupational safety culture. The share of sustainability-related goals in 2024 was 14-24 percent of the annual base salary.

The sustainability goals of the personal remuneration of other employees are mainly related to quality and occupational safety.

Consti's climate aspects have not been taken into account in the remuneration of governance, management, and supervisory bodies, nor has their performance been evaluated in relation to the reported greenhouse gas emission reduction targets.

The principles of Consti's remuneration and the total remuneration of governance, management, and supervisory bodies are described in more detail in notes 3 and 15 of the parent company's financial statements.

1.2.3 Business model, value chain, and strategy (SBM-1)

Business model and value chain

Consti offers a comprehensive range of renovation and building technology services, as well as selected new construction services, to housing companies, corporations, real estate investors, and the public sector in Finland's growth centres.

The operations are divided into four business areas: Housing Companies, Corporations, Public Sector, and Building Technology. All business areas include service business. Service business includes, for example, maintenance and servicing of building technology.

Renovation almost always improves a building's energy efficiency, indoor air quality, and user comfort, such as accessibility and safety. Renovation includes not only technical repairs related to the age of the buildings but also a lot of building purpose modifications, such as converting old, underutilised office buildings into hotels or apartments or improving the usability of spaces by renewing the layout.

Consti's business model emphasises mitigating climate change, which is increasingly the starting point for renovation either through improving energy efficiency or as an alternative to demolishing the building. Energy efficiency is promoted both through building technology and automation as well as through construction techniques, particularly with facade repairs and improving insulation. Climate change increases rainfall and humidity in Finland and adapting to this requires especially careful maintenance of facades.

Consti operates in the construction value chain as a contractor, i.e., a provider of construction services to the client and the end-user of the spaces. Clients, i.e., Consti's largest customers, are cities and municipalities, Finnish pension insurance companies, real estate investors, as well as housing companies.

In addition, the construction value chain includes architects, designers, and other experts, who usually work on behalf of the client. End-users are the staff, patients, and students of public buildings such as schools and hospitals, the employees of office buildings, the entrepreneurs and customers of commercial spaces, and the residents of residential buildings. Except for housing companies, the client is generally responsible for communication with the end-users. The value chain is described in section 1.1.1.

Renovation is largely based on manual labour and specialised skills acquired through experience, as well as collaboration and project management skills, which are also key factors in the production of the construction services offered by Consti.

The value of Consti's work is particularly evident in the extension of the lifespan of buildings, the improvement of energy efficiency and the usability, accessibility, and healthiness of spaces, and the increase in the value of the building. Improving energy efficiency also reduces the carbon dioxide emissions of the building during its use.

At the end of 2024, Consti Group employed 1012 construction and building technology professionals, about 98 percent of whom were in permanent employment. In addition, Consti directly and indirectly employs thousands of workers.

Relationships with workers in the value chain are described in section S2 *Workers in the Value Chain and Relationships with goods and service suppliers* in chapter G1 *Business Conduct*.

Strategy

Consti's mission is to improve the value of Finnish building stock and mitigate climate change through excellent competence in construction and building technology. During the strategy period 2024-2027, Consti aims to grow in construction and building technology by responding to the demand created by the ageing building stock,

urbanisation, and climate change. The need for renovation is also increased by changes in the way spaces are utilised for example in workplaces and the retail sector.

In both construction and building technology, the growth sought by Consti is based on developing the current business. The goal is to make Consti's expertise more widely available throughout the construction value chain, from project development to maintenance. This way, Consti's expertise in sustainable renovation practices and project-specific implementation options can be used as efficiently as possible in the value chain.

Consti aims to be a leader in its field in corporate responsibility. The key sustainability goals for Consti's strategy period 2024-2027 are mitigating climate change, promoting occupational safety and well-being, and developing responsible practices in the industry. These goals are discussed in more detail in connection with the respective themes.

To mitigate and adapt to climate change, Consti is developing energy efficiency expertise and services that take into account the requirements brought by climate change, for example, for the building envelope and maintenance. The decisive factor in the adoption of energy efficiency improvements and energy efficiency services (e.g., building-specific optimised heating solutions) offered by Consti is the benefits they provide to the customer and the customers' willingness to invest in sustainable solutions. In Consti's view, cost-effectiveness is strongly emphasised in customers' decision-making. Increasing recycling and the reuse of building components in construction are shared challenges in the industry.

Business resilience

Consti's climate-related resilience analysis was conducted in conjunction with the double materiality analysis. The scenario analysis examined Consti's business through its characteristic projects and the supporting functions. Consti supplemented this analysis in accordance with the TCFD¹ recommendation. (Figure: *Transition risks and physical risks*, page 48). Consti takes into account the time intervals of 1 year, less than 5 years and more than 5 years in the double materiality analysis, and 5 years and more than 5 years in the supplementary analysis. There was no significant change in the transition events based on the TCFD classification over a one-year time span. Table: E1 *Climate change mitigation, risks and opportunities* can be found in section 2.2.2 *Material impacts, risks and opportunities*.

Consti has identified acute climate risks and regulatory issues as particularly significant among climate-related risks. The Construction Act, EU taxonomy, and the Energy Performance of Buildings Directive require increasingly diverse expertise, especially from designers. A risk for Consti may be the extension of project schedules due to insufficient design expertise. Also, the action and monitoring processes related to taxonomy reporting may add schedule pressure and costs as they increase. Regulation requires monitoring legislation, implementing necessary changes, and possibly adapting services both in Consti's own operations and in its value chain.

Acute climate risks related to climate change may reduce productivity, for example, due to transportation difficulties and problems with global supply chains. The need for construction sites to protect themselves from extreme weather conditions is increasing, and heavy rain and stormwater floods may delay work in urban and suburban areas. Long heatwave periods require rescheduling work and taking care of the working conditions of the staff.

Consti sees the development of new, low-emission products and services as an opportunity. This may strengthen Consti's competitive position and ability to respond to changing customer needs. Significant opportunities are also linked to resource efficiency. The energy efficiency of Consti's operations and the use of low-emission

¹ Source: TCFD. (2017). Final Report - Recommendations of the Task Force on Climate-related Financial Disclosures. <https://assets.bbhub.io/company/sites/60/2021/10/FINAL-2017-TCFD-Report.pdf>

energy sources, proper recycling of waste, and efficient production processes such as the use of prefabricated components may reduce costs. Resource efficiency can also give Consti a reputation advantage.

1.2.4 Sustainability due diligence process (GOV-4)

Consti's business is based on a decentralised organisational structure and operating model. This means that Consti's business areas and profit units have significant decision-making authority and independent powers to conduct business. Responsibility for risk management is at the group level, where clear operational frameworks and requirements are set, and processes and goals are defined for the line organisation to implement the requirements. The achievement and compliance with the goals are regularly monitored. The reporting line is open and transparent from individual projects to the group level.

Consti's due diligence process includes the following elements

Identification, assessment, and prioritisation: The aim is to identify the most likely and significant sustainability risks in Consti's internal and external operations in all business areas, including the sub-contracting and supply chain. Based on the mapping, the most significant risk areas are prioritised for further assessment. Since Consti operates only in the domestic construction market, the assessments are mainly focused on risks generally identified in the construction industry, and the necessary measures are prioritised based on the identified and known impacts.

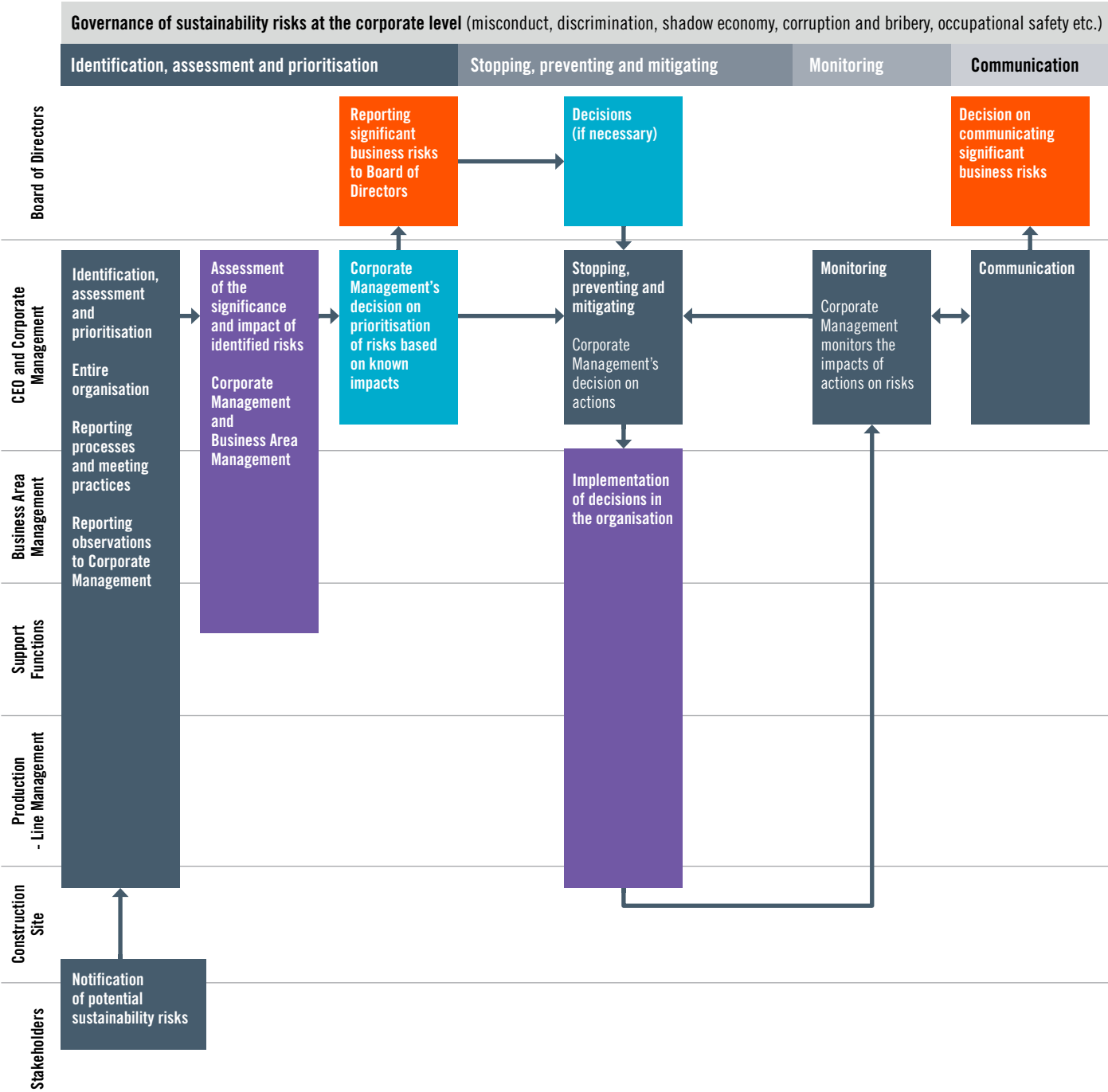
Stopping, preventing, and mitigating: Based on the prioritisation, plans are made to prevent or mitigate actual or potential adverse impacts related to responsible business that are directly linked to the company's or business partner's operations, products, or services.

Key response methods to risks related to business relationships may include continuing the business relationship during risk mitigation efforts, temporarily suspending the business relationship during risk mitigation, or terminating the business relationship. The business relationship is terminated either due to the severity of the adverse impacts or after failed mitigation attempts if the company assesses mitigation as impossible. The decision takes into account the measures taken to eliminate the risks.

Monitoring: Consti monitors the implementation and effectiveness of its due diligence measures, i.e., the measures aimed at identifying, preventing, and mitigating adverse impacts on people and the environment, including correcting business relationships. Monitoring supports the development of due diligence measures and processes.

Communication and transparency: The processes of due diligence and the measures taken to identify and address actual or potential adverse impacts are also communicated externally.

Description of Consti's due diligence process



1.3 Stakeholder interests and views (SBM-2)

The most important stakeholders for Consti are customers (housing companies, public sector developers, real estate investors, and other companies), construction consultants, designers, property managers, subcontractors, suppliers, and current and potential employees, including construction students.

The primary goal of stakeholder cooperation is to map the needs of customers and partners, strengthen cooperation with partners and long-term customers, and make Consti's offerings, expertise, and new industry solutions known. Cooperation with educational institutions aims to make Consti known as an employer and increase knowledge of renovation as an industry. The goal of workplace communication, in addition to daily work-related communication, is to identify issues important to employee well-being and provide employees with the

opportunity to influence the continuous development of the work community.

Continuous dialogue with stakeholders is conducted, especially in customer meetings, joint projects, industry seminars, fairs, and other events, school visits, and student events, as well as through various written surveys such as employee surveys and customer satisfaction surveys conducted at the end of projects. Stakeholder views were more broadly surveyed through surveys during the preparation of sustainability themes in 2020. Since then, stakeholder views have been mapped as part of regular communication, and the views collected in this way have also been used in the double materiality analysis conducted in 2023. In 2024, stakeholder views on Consti's impact opportunities in sustainability and responsibility issues and the significance of sustainability-related aspects and requirements on Consti's operations were surveyed. Partners, employees, and customers all considered the following sustainability factors, which Consti can positively influence, to

Stakeholders' views and impacts on business

Key stakeholders	Themes important to stakeholders	Means and measures	Impact on operations, business model and strategy
Consti's owners	Taking care of the competence of the personnel. Combating the shadow economy.	Board work, general meetings, meetings with investors and their representatives, "Uudistajat" stakeholder magazine, newsletters, annual reports and financial reviews, website.	The development and management of personnel competence and the continuous promotion of occupational safety and well-being are part of the strategy.
Students in the field	Sustainability issues in general.	Cooperation with educational institutions such as site visits, internships, theses, guest lectures, fairs and recruitment events, websites, social media channels.	Increase cooperation with educational institutions.
Public sector operators	Corporate culture and responsible business principles. Education. Equal treatment. Health and safety at work.	Regular customer contacts, customer events, industry seminars and fairs, "Uudistajat" stakeholder magazine and newsletter, customer satisfaction surveys, websites, social media channels.	Increased sustainability requirements in invitations to tender guide Consti towards more responsible operations. E.g. occupational safety issues and waste management.
Partners	Corporate culture and responsible business principles. Know-how. Equal treatment.	Industry seminars and fairs, "Uudistajat" stakeholder magazine and newsletter, website, social media channels.	Development of procurement as part of efficiency improvement. Supporting knowledge in the value chain.
Real estate investors	Corporate governance, such as combating the shadow economy and relations with the supply chain. Safety in a broad sense.	Regular customer contacts, customer events, industry seminars and fairs, "Uudistajat" stakeholder magazine and newsletter, customer satisfaction surveys, websites, social media channels.	Promoting safety is part of the strategy. Combating the shadow economy is a key part of procurement.
Housing company representatives	Sustainability issues in general.	Regular customer contacts, active communication before/during the project/ after the end of the project, customer satisfaction surveys, customer events, industry seminars and fairs, "Uudistajat" stakeholder magazine and newsletter, website, social media channels.	Highlighting sustainable solutions and alternatives in the offering.
Consti's personnel	Sustainability issues in general. Only themes related to water, biodiversity and greenhouse gases are less relevant.	Continuous communication through supervisors and through an internal communication channel, personnel briefings, personnel surveys, development discussions, personnel events, training, occupational safety and health activities.	The development and management of personnel competence and the continuous promotion of occupational safety and well-being are part of the strategy. Sustainability perspectives in guidelines and training.

be significant or very significant: waste and recycling, training and skill development of own staff, equal treatment and equal opportunities for all, corporate culture and responsible business practices, and relationships with suppliers (e.g. good treatment of suppliers and fair payment practices). The views of authorities on Consti's sustainability factors have not been separately surveyed, as authorities promote sustainable development through legislation. Consti complies with the regulations applicable to its operations and monitors industry regulations.

Examples of incorporating stakeholder perspectives include enhancing recycling expertise through internal training, improving waste monitoring, and advancing procurement practices. Efforts to improve occupational safety have included measures such as safety management. To develop staff competencies, collaboration with educational institutions has been increased, for instance through apprenticeship training and facilitating work-based completion of construction-related bachelor's degrees at Universities of Applied Sciences.

In 2024, a plan for regular stakeholder cooperation was prepared. The results of stakeholder surveys are reported to the Board. Stakeholders have not directly participated in defining Consti's sustainability goals.

The table *Stakeholder views and impacts on business* provides a summary of Consti's key stakeholders and how the themes important to them are considered in the company's strategy and business model.

1.4 Material impacts, risks, and opportunities of sustainability

1.4.1 Identification and assessment of material impacts, risks, and opportunities (IRO-1)

The key principle of Consti's risk management is continuous, systematic, and preventive action to identify risks, define the company's accepted risk level, assess and manage risks, and effectively handle and control risks when they materialise so that the company achieves its strategic and financial goals. Sustainability risk management is part of the group's management, monitoring, and reporting systems. Financial and operational risks and the measures taken are regularly reported to the Management Team. Strategic and sustainability risks are addressed annually in the review of strategic projects. The results are discussed by the Board, the group's Management Team, and the Business Area Management Teams.

In assessing risks related to production, the key is to ensure uninterrupted and continuous production under all conditions. The environmental risk assessment process for production is guided by management systems in accordance with the RALA environmental certificate. Key identified risks are included in the company-level risk management process. The environmental impacts of construction sites are assessed, among other things, through project-specific risk assessments.

In identifying and assessing material impacts, risks, and opportunities, it is essential to identify and assess the risks, threats, and opportunities that may be significant for the implementation of the strategy and the achievement of short- and long-term goals, as well as to identify and assess the company's impacts on society and the environment. In addition to the company's own operations, the identification and assessment of impacts, risks, and opportunities covers the key upstream and downstream actors in the value chain, including procurement, construction site operations, customers, and end-users. The value chain is described in section 1.1.1 *Principles of preparing the sustainability report*.

Consti's material impacts, risks, and opportunities related to sustainability have been identified in a double materiality analysis. The preliminary materiality analysis was conducted in November-December 2023 and refined during 2024. Consti aims to develop the analysis of double materiality in the future, for instance in terms of identifying dependencies on impacts, risks and opportunities.

Consti organised three separate workshops in November-December 2023. In addition to the CEO, the first and second workshops were attended by the responsible persons of Consti's ESG groups and an external expert (a total of 9 people). The third workshop was attended by the CEO and the persons responsible for finance and sustainability.

In the first workshop, a common understanding of the definition of sustainability and sustainable practices was strengthened, and the material sustainability themes for Consti were initially identified. The background information used included the results of the materiality analysis conducted in 2020 and the extensive corporate responsibility work preceding it, including the stakeholder survey, value chain definition, and climate scenario (IPCC 6th Assessment Report²). External stakeholders in 2020 included customers, construction students, and investment analysts following Consti, and internal stakeholders included Consti employees. In addition, the first workshop in autumn 2023 reviewed the sustainability themes of the 2021–2023 strategy period and their relevance in the strategy period starting in 2024. After this, the sustainability themes covered by the ESRS standards and their sub-topics and sub-sub-topics were reviewed, and the material sustainability factors were initially assessed for impact materiality and the impacts, risks, and opportunities were prioritised.

In prioritisation, the probability and severity or effect of the impact, risk, or opportunity were considered. Impacts were assessed based on scale, breadth, and the ability to correct the impact.

In the second workshop, financial materiality was examined, and the financial sustainability risks and opportunities were initially assessed.

In the third workshop, the results of the previous workshops on impact materiality were compiled, preliminary assessments were made of the financial sustainability risks and opportunities of the sustainability factors, and the material sustainability themes for Consti were defined. Financial risks have not been assessed in euros.

After the workshops, Consti's Board approved the company's preliminary double materiality analysis at its meeting on 19.12.2023.

During 2024, the preliminary materiality analysis has been updated, among other things, by incorporating the actual and potential positive and negative impacts on the environment, society, or business assessed in the workshops. At the beginning of 2024, the views of the most important stakeholders for Consti on corporate responsibility issues related to Consti were heard. Also, the assessments of the scale, breadth, ability to correct, and probability of impacts were refined during 2024. Based on the refinement, in addition to previously identified risks, the protection of whistleblowers was identified as a material risk.

The Board decided at its meeting on 24 October 2024 to confirm Consti's double materiality analysis, which also took into account the written questions and observations of KPMG Oy Ab and the changes made to the preliminary double materiality analysis based on them.

The next materiality analysis will be carried out during 2025.

² IPCC. Sixth Assessment Report. <https://www.ipcc.ch/assessment-report/ar6/> and <https://www.ilmatieteenlaitos.fi/kuudes-arviointiraportti>

1.4.2 Material sustainability topics

- The material sustainability topics identified for Consti's operations are:
- E1 Climate Change
 - E5 Resource Use and Circular Economy
 - S1 Own Workforce
 - S2 Workers in the Value Chain
 - G1 Business Conduct

For impact materiality, greenhouse gas emissions and energy consumption were identified as the most important sustainability factors in terms of climate change. In terms of resource use and circular economy, demolition, packaging and surplus waste were identified as key sustainability factors. Education and skills development, as well as health and occupational safety, were identified as the most important sustainability factors for the company's own workforce. For employees in the value chain, the most important sustainability factor is health and safety at work. In business conduct, the most significant impact comes from preventing and detecting corruption and bribery, corporate culture, business conduct principles, as well as relationships with suppliers of goods and services in the value chain.

The sustainability factors with the most significant financial impacts are presented in the table *Consti's material sustainability factors*.

The process for identifying and assessing the impacts, risks and opportunities of the following sustainability topics is described in section 1.4.1.

E1 Climate change

Climate change is a significant sustainability factor for the construction industry. The construction industry is one of the largest sources of carbon dioxide emissions, and combating climate change requires significant changes in industry practices and materials. According to the construction industry's materiality analysis, climate change mitigation and adaptation are key themes. This includes the sustainable use of natural resources, energy, and materials, as well as the design of long-lasting buildings and infrastructure³. Additionally, low carbon emissions and energy efficiency are important goals guiding the construction industry's activities.

The environmental footprint of a building is formed from the production of raw materials, logistics, construction itself, and ultimately the use of buildings. Consti is involved in all of this. As a renovation contractor, Consti balances the carbon footprint of construction by reducing emissions as a result of repairs. Renovating old buildings means that fewer raw materials and energy are needed for new construction. Climate change is a key sustainability factor for Consti.

E2 Pollution

According to the ESRS standard E2, the sub-topics of pollution include air, water, and soil pollution, pollution of living organisms and food, hazardous substances, substances of particular concern, and microplastics.

The standard refers to air pollution as the emissions of a company into the air (both indoors and outdoors) and the prevention, limitation, and reduction of such emissions. Paragraph 7 of the standard refers to standard E1 and defines the compounds related to air pollution. These include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF6), and nitrogen trifluoride (NF3).

Consti's business does not fall within the industries defined by the

EU Emissions Directive⁴. In addition, Consti's business operations do not generate significant emissions in the sense and extent referred to in the definition of the regulation or standard. On this basis, Consti has determined that the disclosure requirements presented in standard E2 are not material to Consti's business. Material information on air pollution related to Consti's business operations is taken into account in standard E1.

According to the ESRS standard, soil pollution refers to the release of substances, vibrations, heat, or noise into the soil by human activities, with consequences that may harm human health or the environment, damage tangible property, or impair or prevent the recreational use or other legitimate use of the environment, regardless of whether such discharge occurs at or outside the production site of the company, or when using the company's products and/or services. Soil pollutants include inorganic pollutants, persistent organic pollutants (POPs), pesticides, and nitrogen and phosphorus compounds.

Consti has assessed the impacts of its business and value chain operations on soil contamination to be insignificant. Consti's business operations are largely focused on the renovation of existing properties in the built environment. This activity does not result in the release of substances, vibrations, heat or noise into the soil in such a way that the consequences could cause harm to human health or the environment, damage tangible property, or impair or prevent the recreational or other legitimate use of the environment. On this basis, Consti has considered that the disclosure requirements set out in standard E2 are not material to Consti's business.

E3 Water and marine resources

In the ESRS E2 standard, water pollution refers to the emissions of a company into the water and the prevention, limitation and reduction of such emissions. Point 7 of the standard contains a reference to standard E3 Water and marine resources, which deals with water consumption, especially in water risk areas, and water recycling and storage. This also includes responsible management of marine resources, including the nature and quantity of marine resource commodities (such as gravel, deep-sea minerals, fish and shellfish) used by the company. The standard covers the negative impacts of such activities in the form of pollution of water and marine resources, including microplastics.

Consti's business is not one of the industries defined in the EU Emissions Directive. In addition, Consti's business operations do not generate significant water pollution in the sense and extent referred to in the definition or standard of the regulation. On this basis, Consti has considered that the disclosure requirements set out in standard E3 are not material for Consti's business.

E4 Biodiversity and ecosystems

Consti's business operations do not include activities that would involve a significant risk that they might eradicate, for example, plant species critical to local biodiversity or impede water filtration or spread invasive plant or animal species that could cause significant harm to ecosystems. On this basis, Consti has considered that the disclosure requirements set out in standard E4 are not material for Consti's business.

E5 Resource use and circular economy

In the construction industry's materiality analysis, resource use and material efficiency, climate change mitigation, lifecycle responsibility, and regenerative construction have been identified as key and material sustainability factors. These sustainability factors identified in the

construction industry's materiality analysis apply to Consti as Finland's largest renovation contractor. Consti has identified waste recycling as a material sustainability factor from standard E5.

S1-S2 Own workforce and workers in the value chain

The construction industry is a labour-intensive sector, which is why Consti has identified standards S1 and S2 as material sustainability factors.

S3 Affected communities

Consti's business does not target affected communities as described in the standard. Based on this, Consti has determined that the disclosure requirements presented in standard S3 are not material to Consti's business.

S4 Consumers and end users

Consti's business is focused on Finland, where companies' activities are widely regulated and guided by consumer protection, product safety,

and individual protection legislation, which Consti is also obliged to comply with in its operations. Based on this, Consti has determined that the disclosure requirements presented in standard S4 are not material to Consti's business.

G1 Business conduct

Sustainable corporate culture and its strengthening are essential in Consti's operations. Based on this, Consti has determined that the disclosure requirements presented in standard G1 are material to Consti's business.

Consti's material sustainability factors

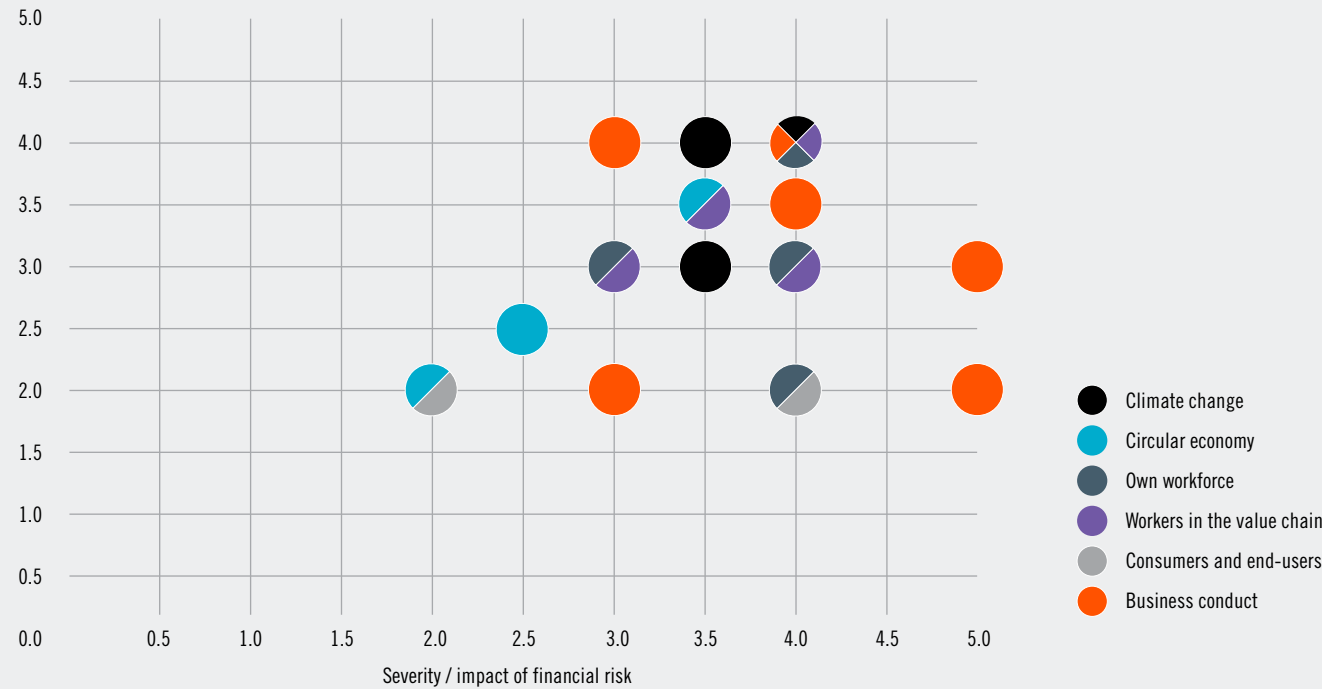
	Topic	ESRS-Standard	Subtopic	Sustainability factors
IMPACT MATERIALITY	Climate change	ESRS E-1	E1-6	Scope 1, 2 and 3 greenhouse gas emissions
	Climate change	ESRS E-1	E1-5	Energy consumption
	Circular economy	ESRS E-5	E5-5	Demolition waste, packaging waste, surplus waste
	Own workforce	ESRS S-1	S1-13	Training and skills development
	Own workforce	ESRS S-1	S1-14	Health and safety at work
	Workers in the value chain	ESRS S-2		Health and safety at work
	Business conduct	ESRS G-1	G1-3	Prevention and detection of corruption and bribery
	Business conduct	ESRS G-1	G1-1	Corporate culture and business conduct policies
ECONOMIC MATERIALITY	Business conduct	ESRS G-1	G1-2	Relations with suppliers
	Climate change	ESRS E-1		Storm (including blizzards, dust and sandstorms)
	Climate change	ESRS E-1		Heavy rain (rain, hail, snow or freezing)
	Climate change	ESRS E-1		Flood (coastal, river, stormwater and groundwater floods)
	Climate change	ESRS E-1	E1-6	Scope 1, 2 and 3 greenhouse gas emissions
	Climate change	ESRS E-1		Heat load
	Climate change	ESRS E-1		Temperature fluctuations
	Climate change	ESRS E-1		Changes in wind conditions
	Climate change	ESRS E-1		Changes in rainfall conditions and types (rain, hail, snow or freezing)
	Climate change	ESRS E-1		Precipitation or hydrological variation
	Climate change	ESRS E-1		Heat wave
	Climate change	ESRS E-1	E1-5	Energy consumption
	Own workforce	ESRS S-1	S1-13	Training and skills development
	Own workforce	ESRS S-1	S1-14	Health and safety at work
	Workers in the value chain	ESRS S-2		Health and safety at work
	Business conduct	ESRS G-1	G1-2	Relations with suppliers
	Business conduct	ESRS G-1	G1-3	Prevention and detection of corruption and bribery
	Business conduct	ESRS G-1	G1-4	Confirmed cases of corruption or bribery
	Business conduct	ESRS G-1	G1-1	Protection for whistleblowers

³ Rakennusteollisuus. (2023). Rakennusteollisuuden vastuullisuuden olennaisuusanalyysi. Loppuraportti. [The materiality analysis of the Confederation of Finnish Construction Industries RT. Final Report]. <https://www.epressi.com/media/userfiles/151418/1709905156/rakennusteollisuuden-vastuullisuuden-olennaisuusanalyysi-loppuraportti.pdf>

⁴ Euroopan parlamentti. (2023). Climate change: the greenhouse gases causing global warming. <https://www.europarl.europa.eu/topics/en/article/20230316STO77629/climate-change-the-greenhouse-gases-causing-global-warming>

Assessment scale for impacts, risks, and opportunities

Financial risks and their probabilities



The significance of impacts was assessed on a scale of 1–5, where 1=very low, 2=low impact, 3=moderate impact, 4=significant impact, and 5=very significant impact. The probabilities of risks, as well as their severity and impact, were assessed on the same scale. Each assessment was also made for timeframes of 1 year, less than 5 years (medium term), and more than 5 years (long term).

Sub-topics that received a high rating were defined as material sub-topics. In terms of impact materiality, this means a value of at least 14–16, and in terms of financial materiality, a value of at least 15–16⁵. Additionally, any sub-topic with a severity or impact value of 5 (very significant) was defined as a material sub-topic. Sub-topics with low materiality were not included in the table.

1.4.3 Interaction of material impacts, risks, and opportunities with strategy and business model (SBM-3)

In Consti's view, sustainability-related impacts on Consti's business and strategy are mostly positive. The essential opportunities relate to the growth of Consti's business, as a significant part of Consti's business and expertise involves extending the lifecycle of the built environment, repairing as an alternative to demolition and new construction, improving energy efficiency, and enhancing buildings' ability to withstand the stresses caused by climate change. All of this reduces the carbon footprint of the built environment and the costs for property owners. The increase in sustainability requirements strengthens Consti's opportunity to continue offering work both directly and indirectly.

So far, the increase in sustainability requirements has caused changes in Consti's daily operations, particularly in the recycling of construction waste and ensuring sustainability expertise, such as monitoring and reporting skills.

The key sustainability risks affecting Consti's strategic objectives relate to success in supply chain management, occupational safety, and preventing corruption and bribery. These risks particularly affect Consti's own and construction service providers' activities both in the short and long term and are due to the nature of the business. The most significant area for development is identifying and measuring the sustainability impacts of the value chain. Ensuring the training of Consti's own personnel is also a prerequisite for taking advantage of the opportunities created by sustainability requirements. The risks related to occupational safety and their management are described in section 3.1. S1 *Own Workforce*. The risks related to corruption and bribery and their management are described in section 4.1. G1 *Business Conduct*.

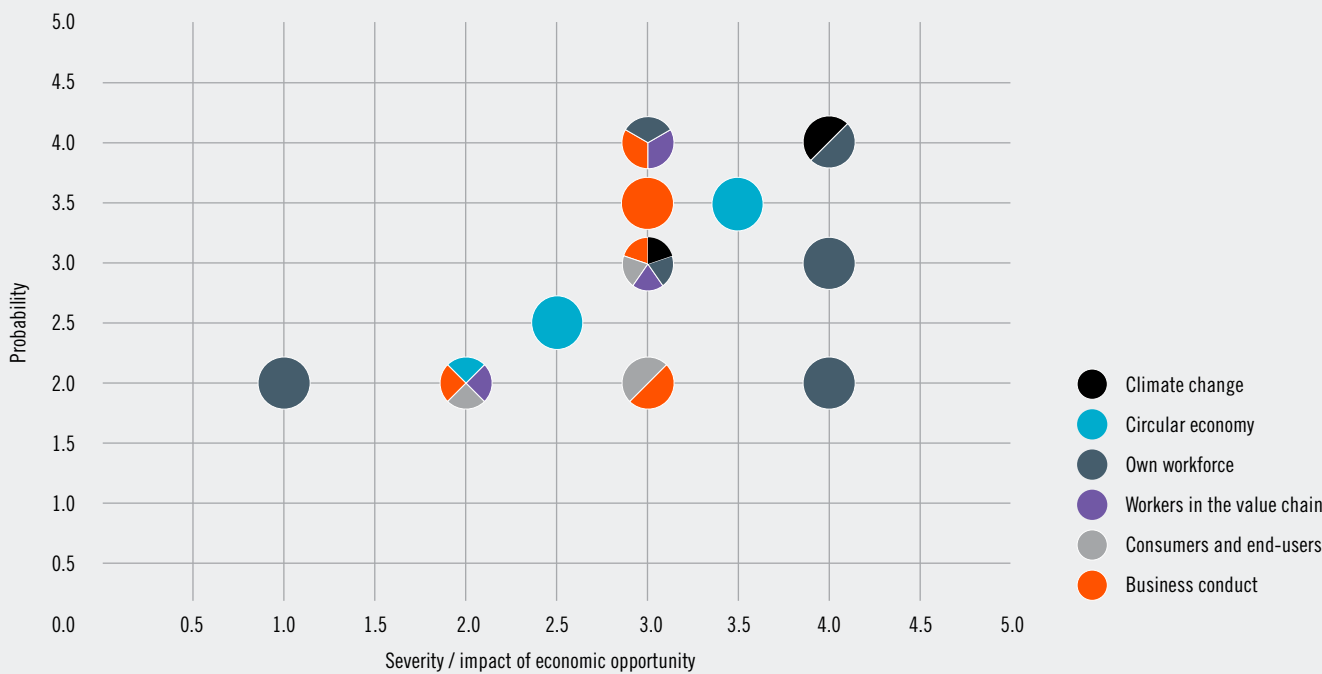
In managing climate risks, it is essential for Consti to reduce greenhouse gas emissions and find solutions to the challenges posed by acute climate risks, such as intensifying storms and rains on construction sites. Climate risks are due to external factors, and Consti expects climate risks to increase over a five-year time horizon. Preparing for risks requires new skills and perspectives on contract agreements and site planning. The risks related to environmental themes and their management are described in chapters E1 *Climate Change* and E5 *Recycling*.

Consti's strategy and business model are described in more detail in section 1.2.3.

1.4.4 Sustainability goals and metrics (MDR-T, MDR-M)

The sustainability goals and metrics are based on Consti's strategy. The preparation of the measurement criteria and underlying assumptions is coordinated by Consti's Sustainability Steering Group, and they have been approved by the Group's Management Team. The metrics for the sustainability topics identified as material and their limitations are described in the section of this report on the sustainability topic in question.

Economic opportunities and their probabilities



Consti's sustainability targets for the strategy period 2024–2027	Goals for 2024	Indicator	Realisation or result 2024
E - Environment			
Reducing emissions from own operations (Scope 1 and Scope 2). Consti will be carbon neutral by 2035	Reducing emissions from own operations (Scope 1 and Scope 2)	Emission intensity tCO ₂ eq / net sales M€	7.8
Reducing Scope 3 emissions	Calculation of Scope 3 emissions for 2023 and 2024	Realised/Not realised	Realised
Commitment to the SBTi climate target	Commitment to the SBTi climate target	Realised/Not realised	Not realised
Monitoring and control of energy consumption at worksites established and emission reduction targets set	Plan for reducing worksite emissions	Realised/Not realised	Realised
Strengthening competence required due to climate change, especially in energy efficiency solutions, facade repair and maintenance, yard construction, and providing related services to customers	3 Energy efficiency projects completed	Completed qty	8
	3 Consti Optimi customer projects completed	Completed qty	0
Increasing the relative share of net sales according to the taxonomy	% increase	%	14.7%
Construction site waste recycling rate 70%	Construction site waste recycling rate 70 %	Recycling rate, %	70%

⁵ The value is determined as follows: Step 1: multiply the probability of each topic by its severity or impact for periods of less than 5 years and more than 5 years. Step 2: determine the average of the values calculated in step 1 for periods of less than 5 years and more than 5 years.

Consti's sustainability targets for the strategy period 2024–2027	Goals for 2024	Indicator	Realisation or result 2024
S - Social responsibility			
To provide our own personnel with an equal working environment that encourages competence development	Increasing the number of women in different personnel groups	Share of women, % of total staff	12.7%
	Fixed-term employment contracts < 5%	Fixed-term employment, % of total staff	2%
Promoting well-being at work	Promoting work ability - task-specific written instructions for the most physically demanding tasks	Reducing absenteeism due to musculoskeletal disorder, day/person	2.9 day/person
Reduction of occupational accidents and sick leave absences	Fewer sickness absences than before. Accident frequency <10	Sick leave absences, % and accident frequency	Sick leave absences 4.1% (5.2%) Accident frequency 7 (10)
Competence and leadership development	Create a leadership development programme for line supervisors, a competence development framework	Realised/Not realised	Realised
Committed and healthy personnel	Committed and healthy personnel. Employee turnover < 10%	Employee turnover, %	12.6%
	Age balance	Age distribution, all employees	Balanced
Provide the partners' personnel with an equal working environment that encourages competence development	Mapping and describing human rights processes	Realised/Not realised	Realised
G - Sustainability governance			
Developing partner cooperation to improve sustainability, quality, service and efficiency	Development plan for supplier ESG sustainability assessment methods	Realised/Not realised	Not Realised
	Identification of the main actors in the value chain	Realised/Not realised	Realised
	100% of subcontractors committed to Consti's Code of Conduct	Subcontractors committed to Consti's Code of Conduct, %	Realisation estimate 90%
	No incidents that violate the Code of Conduct	Incidents that violate the Code of Conduct, pcs	Realised, 0 pcs
Reduce the shadow economy in the construction sector together with other operators in the sector	Confirmed cases of corruption or bribery 0 cases	Confirmed cases of corruption or bribery, pcs	Realised, 0 pcs
Reduce shadow economy risks in own operations	Development plan for supplier ESG sustainability assessment methodology	Realised/Not realised	Not Realised
Increasing taxonomy expertise in business to benefit customers	Increase in the number of taxonomy-compliant projects	Realised/Not realised	Realised

2 (E-ENVIRONMENT) ENVIRONMENTAL INFORMATION

2.1 EU taxonomy

2.1.1 General

The EU taxonomy is the European Union’s classification system for environmentally sustainable economic activities. Its goal is to harmonise corporate sustainability reporting and guide investments towards sustainable activities. The classification system includes six environmental objectives: 1) climate change mitigation, 2) climate change adaptation, 3) the sustainable use and protection of water and marine resources, 4) the transition to a circular economy, 5) pollution prevention and control and 6) the protection and restoration of biodiversity and ecosystems.

Companies must report the share of their revenue, capital expenditures, and operating expenses that are eligible for the taxonomy (taxonomy eligibility) and the extent to which their economic activities are environmentally sustainable according to the taxonomy requirements (taxonomy alignment).

To be taxonomy-aligned, economic activity must meet the sector-specific requirements defined for each environmental objective in the taxonomy. Additionally, the European Commission has defined sector-specific assessment criteria to determine whether the economic activity causes significant harm to other environmental objectives. To be taxonomy-aligned, the activity must not cause significant harm to other environmental objectives (DNSH principle, do no significant harm). Additionally, the activity must comply with the ethical labour and human rights principles of the UN, OECD, and ILO.

2.1.2 Taxonomy reporting

In the financial year 2024, companies must report both the taxonomy eligibility and taxonomy alignment of their activities concerning all six environmental objectives. The share of revenue, capital expenditures, and operating expenses is reported. Consti has assessed the taxonomy eligibility and taxonomy alignment of its activities based on the best interpretation of the EU taxonomy regulations⁶, climate and environmental delegated acts⁷, and the guidelines provided by the European Commission. Additionally, Consti has considered the interpretation guidelines published for the construction industry by Green Building Council Finland and the Confederation of Finnish Construction Industries RT.

The first phase of Consti’s taxonomy review is done at the contract stage. The site management is responsible for monitoring the fulfilment of the criteria and taking necessary actions. The finance department reports the euro-denominated realisation of taxonomy-aligned revenue based on pre-agreed criteria and monitoring.

2.1.3 Reporting principles

Construction and the use of buildings have a significant impact on climate change. In renovation, the energy efficiency of the building is always improved both technically and structurally.

The EU’s six environmental goals for the construction industry include the *Substantial contribution to climate change mitigation* target as well as the *Substantial contribution to the transition to a circular economy* target. Consti estimates that approximately 76.7 (85.3) percent of its revenue is taxonomy-eligible with regard to the above objectives. Based on Consti’s assessment, its activities are not taxonomy-eligible for other environmental objectives.

According to Consti’s interpretation, 14.7 (9.8) percent of its revenue is taxonomy-aligned. Taxonomy-aligned activities consist of the activities in the taxonomy sections 7.2 *Renovation of existing buildings*, 7.3 *Installation, maintenance, and repair of energy efficiency equipment*, 7.4 *Installation, maintenance and repair of charging stations for electric vehicles in buildings*, 7.5 *Installation, maintenance, and repair of instruments and devices for measuring, regulating, and controlling the energy performance of buildings* and 7.6 *Installation, maintenance and repair of renewable energy technologies*.

For renovation projects falling under category 7.2, a key requirement for significantly contributing to climate change mitigation is either compliance with the applicable requirements for large-scale renovations or, alternatively, achieving a reduction of at least 30% in primary energy demand as a result of the renovation. Consti estimates that in the financial year 2024, three major renovation projects met both the significant promotion criteria and the non-significant harm criteria required by section 7.2. Projects that did not meet the significant promotion criteria or the non-significant harm criteria, for example, in terms of construction waste recycling, were not included in the taxonomy-aligned revenue.

Section 7.3 *Installation, maintenance, and repair of energy efficiency equipment* includes, among other things, adding insulation to parts of the existing building envelope, replacing old windows and doors with energy-efficient ones, energy-efficient lighting, and installing, replacing, maintaining, and repairing HVAC and water heating systems and fixtures.

Section 7.4 *Installation, maintenance and repair of charging stations for electric vehicles in buildings* includes installation, maintenance and repair of charging stations for electric vehicles.

Section 7.5 *Installation, maintenance, and repair of instruments and devices for measuring, regulating, and controlling energy performance of buildings* includes, among other things, the installation, maintenance, and repair of room-specific thermostats, smart thermostat systems and sensor devices, building automation and management systems, building energy management systems, lighting control systems, and energy management systems.

Section 7.6 *Installation, maintenance and repair of renewable energy technologies* includes, among other things, the installation, maintenance, and repair of solar power systems and solar panels, as well as the use of renewable energy for heating.

Consti estimates that its financial activities are taxonomy-aligned with the above-mentioned criteria and that and that its financial activities meet the non-significant harm (DNSH) criteria defined for these categories.

For *Climate change adaptation* (DNSH 2 criterion), Consti has conducted a climate risk assessment for its reported taxonomy-aligned economic activities. Consti has identified the material climate risks that may be significant and has planned adaptation measures for these risks.

With regards to *Sustainable use and protection of water and marine resources* (DNSH 3 criterion), Consti’s projects, with the exception of residential buildings, meet the requirements for water fixtures with limited flow, according to Consti’s assessment.

With regard to the *Transition to a circular economy* (DNSH 4 criterion), Consti interprets that the requirement for waste recycling: “prepared for reuse, recycling and other material recovery” is fulfilled to the extent that the sorting, reuse, recycling and other recovery of waste generated by Consti’s operations can be ensured and the recycling rate verified.

With regard to *Pollution prevention and control* (DNSH 5), Consti interprets that the building components and materials it uses meet the criteria.

⁶ EU 2020/852

⁷ EU 2021/2139, 2023/2485, 2023/2486

When assessing taxonomy alignment, the alignment of activities included in section 7.1. *Construction of new buildings* was also examined. Part of Consti's economic activities involve new construction, but the information required to meet the taxonomy requirements is not yet sufficiently available in the company. Based on this, Consti's activities in the "New construction" section are not taxonomy-aligned.

Consti has assessed its minimum safeguards for preventing bribery and corruption, tax regulation, fair competition, and human rights. According to Consti's assessment, the company meets the minimum safeguards. In its assessment, Consti has taken into account the OECD Guidelines for Multinational Enterprises⁷, the EU Taxonomy's Final Report on Minimum Safeguards (2022), the UN Guiding Principles on Business and Human Rights, and the ILO's ethical labour and

human rights principles. The principles and measures included in Consti's minimum safeguards are described in chapter 4, sections 4.1.4 *Operating principles* and 4.1.7 *Preventing and detecting of the shadow economy*.

The definition of the EU taxonomy revenue indicator corresponds to the items presented in Consti's consolidated income statement. Consti's revenue mainly consists of projects recognised over time. The assessment of the technical criteria for projects recognised over time is based on the information available at the time of the financial statements. If the assessment changes as the project progresses, the taxonomy status of the project is updated. Retroactive adjustments to previously reported information are not made in this case.

Proportion of Net sales from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

		2024		Substantial contribution criteria						DNSH criteria (Does Not Significantly Harm)						Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) Net sales, year N-1	Category enabling activity	Category (transitional activity)
		Net sales	Proportion of Net sales	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Y/N	%	E	T
		m€	%	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N			
A. TAXONOMY-ELIGIBLE ECONOMIC ACTIVITIES																			
A.1 Environmentally sustainable activities (taxonomy-aligned)																			
Renovation of existing buildings	CCM 7.2	36.0	11.0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N	Y	Y	Y	Y	N	Y	5.6		T
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	10.2	3.1	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N	Y	N	Y	N	N	Y	3.9	E	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	0.0	0.0	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N	Y	N	N	N	N	Y	0.0	E	
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	1.1	0.3	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N	Y	N	N	N	N	Y	0.2	E	
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	0.7	0.2	Y	N/EL	N/EL	N/EL	N/EL	N/EL	N	Y	N	N	N	N	Y	0.0	E	
Net sales of environmentally sustainable activities (taxonomy-aligned) (A.1)		48.0	14.7														9.8		
Of which enabling		12.0	3.7													Y	4.1	E	
Of which transitional		36.0	11.0													Y	5.6		T
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL										
Construction of new buildings	CCM 7.1 /CE 3.1	12.1	3.7	EL				EL									7.5		
Renovation of existing buildings	CCM 7.2 /CE 3.2	190.6	58.3	EL				EL									68.1		
Net sales of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		202.7	62.0														75.6		
A. Net sales of Taxonomy-eligible activities (A.1+A.2)		250.7	76.7														85.3		
B. TAXONOMY-NON ELIGIBLE ECONOMIC ACTIVITIES																			
Net sales of Taxonomy-non-eligible activities		76.0	23.3																
TOTAL (A+B)		326.7	100.0																

⁷ Työ- ja elinkeinoministeriö. (2019). TEM oppaat ja muut julkaisut 2019:5. OECD:n asianmukaisen huolellisuuden ohjeet vastuulliseen liiketoimintaan. [OECD's appropriate care instructions responsible business]. https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/161430/TEM_oppaat_5_2019_OECDn_asianmukaisen_huolellisuuden_ohjeet_04032019.pdf?sequence=1

Capital expenditures

In Consti's business model, investment needs are small, as the company's capacity is largely generated by manpower. Consti Group's investments in intangible and tangible assets were 1.2 (2.0) million euros. The investments mainly include machinery and equipment purchases. Investments in right-of-use assets (IFRS 16) were 1.7 (3.0) million euros and were mainly related to renewed leasing agreements for production vehicles, and the treatment of indefinite-term leases for

office and warehouse spaces in accordance with the IFRS 16 standard. Investments in intangible and tangible assets resulting from business combinations were 0.0 (1.1) million euros.

According to Consti's estimate, its capital expenditures as defined in the Taxonomy Regulation totalled approximately 2.9 (6.2) million euros in the financial year 2024.

Based on Consti's assessment, its capital expenditure in 2024 was not eligible for the classification system.

Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

	2024		Substantial contribution criteria							DNSH criteria (Does Not Significantly Harm)						Minimum safeguards	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) CapEx, year N-1	Category enabling activity	Category (transitional activity)
	CapEx	Proportion of CapEx	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Y/N				
Codes	m€	%	Y;N;/EL	Y;N;/EL	Y;N;/EL	Y;N;/EL	Y;N;/EL	Y;N;/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N		%	E	T
A. TAXONOMY-ELIGIBLE ECONOMIC ACTIVITIES																			
A.1 Environmentally sustainable activities (taxonomy-aligned)																			
-																			
CapEx of environmentally sustainable activities (taxonomy-aligned) (A.1)	0.0	0.0															0.0		
Of which enabling	0.0	0.0															0.0		
Of which transitional	0.0	0.0															0.0		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
			EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL											
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	0.0	0.0															0.0		
A. CapEx of Taxonomy-eligible activities (A.1+A.2)	0.0	0.0															0.0		
B. TAXONOMY-NON ELIGIBLE ECONOMIC ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities	2.9	100.0																	
TOTAL (A+B)	2.9	100.0																	

Operating expenses

According to Consti's estimate, its operating expenses defined in the taxonomy regulation were approximately 1.0 (1.1) million euros for the financial year 2024.

Based on Consti's assessment, these operating expenses were not eligible for the classification system.

Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Operating expenses		2024		Substantial contribution criteria						DNSH criteria (Does Not Significantly Harm)						Minimum safeguards		Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) OpEx, year		Category enabling activity		Category (transitional activity)	
		OpEx	Proportion of OpEx	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity								
According to Consti's estimate, its operating expenses defined in the taxonomy regulation were approximately 1.0 (1.1) million euros for the financial year 2024.																							
Based on Consti's assessment, these operating expenses were not eligible for the classification system.																							
Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024				Codes	m€	%	Y;N;N/ EL	Y;N;N/ EL	Y;N;N/ EL	Y;N;N/ EL	Y;N;N/ EL	Y;N;N/ EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T		
A. TAXONOMY-ELIGIBLE ECONOMIC ACTIVITIES																							
A.1 Environmentally sustainable activities (taxonomy-aligned)																							
-																							
OpEx of environmentally sustainable activities (taxonomy-aligned) (A.1)					0.0	0.0													0.0				
Of which enabling					0.0	0.0													0.0				
Of which transitional					0.0	0.0													0.0				
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)							EL;N/ EL	EL;N/ EL	EL;N/ EL	EL;N/ EL	EL;N/ EL	EL;N/ EL											
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)					0.0	0.0													0.0				
A. OpEx of Taxonomy-eligible activities (A.1+A.2)					0.0	0.0													0.0				
B. TAXONOMY-NON ELIGIBLE ECONOMIC ACTIVITIES																							
OpEx of Taxonomy-non-eligible activities					1.0	100.0																	
TOTAL (A+B)					1.0	100.0																	

Activities related to nuclear power and fossil gases

ROW	NUCLEAR ENERGY RELATED ACTIVITIES	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
FOSSIL GAS RELATED ACTIVITIES		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

2.2 E1 Climate change

2.2.1 Goals (E1-4)

Consti aims to reduce its own energy consumption and emissions so that its own operations (Scope 1 and Scope 2) are carbon neutral by 2035. The goal supports the Paris Climate Agreement’s target of limiting global warming to a maximum of 1.5 degrees compared to pre-industrial times.

Key sustainability factors	Consti's sustainability targets for the strategy period 2024–2027	Goals for 2024	Indicator
Climate change: Greenhouse gas emissions	Reducing emissions from own operations (Scope 1 and Scope 2). Consti will be carbon neutral by 2035	Reducing emissions from own operations (Scope 1 and Scope 2)	Emission intensity tCO ₂ eq / net sales M€
	Reducing Scope 3 emissions	Calculation of Scope 3 emissions for 2023 and 2024	Realised/Not Realised
	Commitment to the SBTi climate target	SBTi commitment accepted	Realised/Not Realised
Climate change: Energy consumption	Monitoring and control of energy consumption at worksites established and emission reduction targets set	Plan for reducing worksite emissions	Realised/Not Realised
	Strengthening the competence required for climate change, especially in energy efficiency solutions, facade repair and maintenance, yard construction, and providing related services to customers	3 Energy efficiency projects completed	Actual pcs
		3 Consti Optimi customer projects completed	Actual pcs
	Increasing the relative share of net sales according to the taxonomy	% increase	%

In 2024, Consti decided to switch from fossil diesel to biodiesel in company cars and half of the production vehicles where this was feasible.

In 2024, emission-free electricity was procured for four offices. Later in the year, the Lahti office transitioned from natural gas to biogas.

2.2.2 Material impacts, risks, and opportunities (IRO-1)

The material impacts, risks, and opportunities related to climate change have been identified in the double materiality analysis presented in section 1.4.1. *Identification and assessment of material impacts, risks, and opportunities.* As part of the double materiality analysis, physical risks related to climate change adaptation and their management were examined, among other things. The significant impacts, risks, and opportunities related to climate change mitigation and energy are described in the table: E1 *Climate change mitigation, risks and opportunities.*

E1 Climate change mitigation, risks and opportunities

Sustainability area		Material impacts, risks and opportunities	Management	Stakeholder insight
Greenhouse gas emissions and energy consumption: Consti's impact				
E1-6 Consti's operations cause greenhouse gas emissions	▲	Opportunity: Succeeding in reducing emissions caused by Consti and its value chain reduces emissions from the built environment, which accounts for a significant share of society's emissions.	Consti's strategic goal is to mitigate climate change both in its own operations and in the built environment more broadly through renovation. Own operations are guided by the green transition plan, which includes, among other things, the transition to fossil-free fuels and fossil-free electricity and heat.	According to stakeholders, Consti's negative impact on greenhouse gas emissions is not significant.
	▼	Risk: Expertise related to emissions in planning and the supply chain. If Consti fails to reduce its own greenhouse gas emissions (Scope 1 and Scope 2), it will make it more difficult for customers to achieve their reduction targets.		
E1-5 Consti's operations consume energy	▲	Opportunity: Reduced energy consumption reduces costs throughout the value chain and supports the achievement of emission reduction targets.	Green transition plan. Up-to-date monitoring of energy consumption at construction sites.	
	▼	Risk: If Consti fails to reduce its energy consumption, it may increase costs and make it more difficult for customers to achieve their reduction targets.		
E1-6 Consti's services and used products consume energy and generate emissions	▲	Opportunity: Consti has extensive experience in comprehensive renovation projects. Productised services such as Consti Optimi and Eco Consti enable the expansion of service offerings. Energy efficiency requirements encourage the development of expertise, business operations, and new business models that benefit society as a whole.	Active monitoring of regulation and implementation of measures arising from the requirements. Increasing the competence of personnel and management in both environmental requirements and customer needs. Development of the overall service and its provision.	Consti's customers attach importance to Consti's energy efficiency expertise and the energy efficiency of its services.
	▼	Risk: Regulations impose significant demands for new production methods to reduce emissions. If Consti fails to achieve or maintain the required level of expertise, projects may not be executed in accordance with customer needs and regulatory requirements.		
Greenhouse gas emissions and energy consumption: impact on Consti				
E1-6 Consti's value chain generates Scope 3 emissions	▲	Opportunity: Incentive to develop the company's own operations and explore new business models. Encourages the enhancement of expertise, the offering of new services, and the improvement of operational efficiency. Provides the opportunity to sell products and services that meet and enable the customer's own circular economy goals.	More than 90% of Consti's greenhouse gas emissions come from elsewhere in the value chain. Low emissions must be taken into account when selecting the largest and recurring procurement batches. Developing cooperation with suppliers and service providers to determine the carbon footprint. Increasing procurement know-how.	Partners believe that greenhouse gases can have a significant negative impact on Consti's business.
	▼	Risk: Expertise within the procurement chain in identifying, measuring, and reducing climate impacts across the entire value chain. If sustainability requirements cannot be met due to a lack of expertise, it may hinder the achievement of customer goals and damage Consti's reputation as a competent and sustainable partner.		
Consti's value chain consumes a lot of energy	▲	Opportunity: Successfully enhancing expertise, particularly in procurement, can provide Consti with a competitive advantage. An increase in renovation work instead of new construction could expand Consti's business.	The aim is to use low-emission concrete and recycled iron where possible. Worksites are instructed to save energy.	
	▼	Risk: The production of concrete and steel used in construction consumes a significant amount of energy and generates substantial emissions. Heating construction sites also requires energy. If Consti is unable to reduce energy consumption across its entire value chain, it may increase costs, hinder the achievement of customer goals, and weaken Consti's competitiveness.		

Material impacts, risks, and opportunities related to climate change mitigation and energy

Transition and physical risks			
	Climate-related risks	Climate-related potential Financial risks	Management
TRANSITION RISKS	Policy and legislation	Increased pricing of greenhouse gas emissions.	Monitoring changing legislation and implementing necessary change measures. Continuous product and service development, where regulation is taken into account.
		Increased regulation of products and services.	
		Increasing emissions calculation reporting.	
		The Building Act, the EU taxonomy and the Energy Performance of Buildings Directive may slow down the planning process.	
	Technology	Replacing existing products and services with low-emission ones requires expertise that may be or may become in short supply, which in turn increases costs.	Continuous product and service development, which also takes into account customer needs. Accurate risk assessment at the start of research and development.
		Failed investment in new technologies and services.	
		Increased costs due to the transition to lower-emission technologies.	
	Markets and consumers	Decrease in demand for goods and services due to change in consumer preferences.	Continued electricity price hedging as part of a larger electricity procurement pool. Engaging in active dialogue with the supplier network – exploring the possibility of risk sharing. Maintaining active dialogue with customers to understand their needs and how they evolve.
		Increase in raw material costs.	
		Market volatility e.g. as a result of uncertainty about future regulation or new technologies at an experimental stage.	
	Reputation	Changes in consumer preferences.	Regularly monitoring customer feedback and responding to customer needs. Cooperation with partners and continuous mapping of their expertise in the market. Personnel surveys and correcting the development areas identified in them. Responsible operations that extend to every Consti employee.
		Negative stigma of the construction sector.	
		Increased concerns from customers, financiers and other stakeholders or negative feedback from stakeholders.	
		Loss of employer reputation, due to e.g. poorly managed environmental issues, would weaken the availability of labour.	
PHYSICAL RISKS	Acute	Essential for Consti: storm, heavy rain, flood, heat load and heat wave.	Develop the ability to prepare for and react to problems caused by physical climate risks in planning and on construction sites. This is done in collaboration with partners in the value chain.
	Chronic	Defined as material for Consti: temperature variations, changes in wind conditions, changes in rainfall conditions and types, precipitation or hydrological variation.	

Climate-related opportunities		
	Climate opportunities	Climate-related economic opportunities
Resource efficiency	The introduction of more efficient modes of transport to the market and their utilisation.	Reduction of operating costs (e.g. through efficiency improvements and cost reductions).
	Use of more efficient production processes on work sites, e.g. prefabrication and streaming.	Possibility to increase production capacity, which supports revenue growth.
	Successful recycling and transition to a circular economy.	Potential material savings and reduced waste fees.
	Moving to more efficient buildings, reducing water use and consumption.	Possibility to offer energy efficiency services more widely.
	Use of low-emission energy sources.	Reputation benefits as a sustainable partner.
Energy source	Economic incentives from society.	Utilisation of incentives in one's own activities. Reduces vulnerability to future fossil fuel price increases.
	Use of new technologies.	Reduces greenhouse gas emissions and potential emission charges and can also reduce sensitivity to changes in energy prices.
Products and services		Increases access to capital (e.g. when investors favor low-emission operators and require the supply of energy-efficient buildings).
	Development of new products or services through research and development and innovation.	A better competitive position to meet changing consumer preferences, supporting revenue and earnings growth.
	Ability for diversified business.	Reputational benefits that lead to increased demand and support revenue and productivity growth.
	Change in consumer preferences.	
	Development and/or expansion of low-emission products and services.	
Market	Substitution/diversification of resources.	Increasing the reliability of the supply chain and the ability to operate in different conditions brings competitive advantage and cost savings.
		Revenue growth through new products and services related to ensuring resilience.
	Access to new markets.	Expansion in the value chain.
Resilience	Use of public sector incentives.	Diversification of financing options and lower financing prices (e.g. green bonds).
	Introduction of energy efficiency measures expands know-how.	Increased supply chain reliability and ability to operate in different conditions brings reputational benefits and can lead to increased turnover and productivity.

Consti has not assessed how the company's assets and business may be exposed to climate-related transition events that cause transition risks or opportunities. Consti has not assessed to what extent its assets and business may be exposed to identified transition events and to what extent they are sensitive to them.

2.2.3 Operating principles (E1-2)

Consti is committed to continuously improving environmental and energy efficiency. Consti is committed to reducing its own Scope 1 and Scope 2 emissions in its environmental principles and has set CO₂eq emission reduction targets for its own operations. In addition, Consti has defined emission reduction targets for Scope 3 emissions (2.2.5 *Transition plan*).

Consti develops environmental competence and culture through, among other things, training for staff and management and increasing partners' understanding of Consti's responsible operations and requirements.

Environmental management and performance are guided by the requirements of RALA's quality and environmental certificates. Consti's environmental goals are not based on reliable scientific evidence.

The implementation of operating principles is the responsibility of Business Area Directors in addition to the CEO.

2.2.4 Measures (E1-3)

Climate change mitigation, greenhouse gas emissions, and energy

A key measure has been to create methods for systematically monitoring energy consumption at construction sites. Guidelines have been prepared for construction sites to improve energy efficiency. Construction sites can also utilise the group's competitive electricity contract, for example, to obtain a guarantee of origin for the use of emission-free electricity. Most of the energy consumption in Consti's own operations occurs at construction sites.

Internally, Consti has instructed staff to reduce energy consumption through, among other things, guidelines available on the intranet.

Consti's emission reductions are implemented gradually by transitioning to electric production and company cars, replacing the use of fossil fuels with emission-free alternatives, and switching to emission-free electricity or other emission-free energy at offices and work sites. A key aspect of implementing the transition plan is continuous staff training and ensuring sustainable practices. CO₂eq emissions from Consti's own operations are calculated annually, and a statutory energy audit report is prepared every four years. Partners are required to act responsibly in terms of the environment, for example, in subcontracting agreements.

Consti regularly reviews its emission calculation principles to ensure they comply with current requirements. Consti continuously strives to improve its data collection processes and increase cooperation with supply chain partners. The goal is to develop increasingly accurate and comprehensive methods that support Consti's climate goals.

Consti develops energy-efficient services for its customers, such as Consti Optimi, a site-specific multi-energy system that utilises waste heat from the building.

Greenhouse gas emissions in the value chain

Consti has also set targets for greenhouse gas emissions in the value chain. This is explained in more detail in section 2.2.5 *Consti's transition plan*. According to Consti's ethical guidelines, Consti's partner commits to promoting the efficient use of resources, such as energy and materials, in its operations and strives to reduce the use of substances that negatively impact the climate. Subcontractors are required to handle waste efficiently, which in practice means minimising landfill waste and effective sorting.

Climate change adaptation

Adapting to climate change requires adaptation to both acute threats, such as extreme weather events, and chronic threats, such as warming winters and permanent changes in snow, storm, and humidity conditions. Acute risks, especially extreme weather events, are significant risks for Consti's operations.

Consti prepares for threats caused by extreme weather events at the organisational level as required by the situation. In production, Consti can prepare for heatwaves by cooling workspaces, planning work so that it is not done during the hottest part of the day, and ensuring statutory breaks. Storms and heavy rains are prepared for by monitoring weather forecasts and planning the removal of rainwater and snow from construction sites more precisely, as well as protecting materials and spaces.

In addition, Consti offers services to its customers that help buildings withstand extreme weather events and, for example, the increasingly common wet winters and slanting rains in Finland.

Energy consumption and mix (E1-5)

Energy consumption and mix	2024
- Fuel consumption from coal and coal products (MWh)	280.3
- Fuel consumption from crude oil and petroleum products (MWh)	4,991.0
- Fuel consumption from natural gas (MWh)	349.9
- Fuel consumption from other fossil sources (MWh)	478.1
- Consumption of electricity, heat, steam and cooling from fossil sources purchased or procured (MWh)	0.0
Total fossil energy consumption (MWh)	6,099.3
Share of fossil energy sources in total energy consumption (%)	52%
Energy consumption from nuclear sources (MWh)	2,087.1
Share of nuclear sources in total energy consumption (%)	18%
- Fuel consumption from renewable sources, including biomass (including industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (MWh)	316.8
- Consumption of electricity, heat, steam and cooling from renewable sources purchased or procured (MWh)	3,123.2
- Self-generated non-fuel renewable energy consumption (MWh)	0.0
Total renewable energy consumption (MWh)	3,440
Share of renewable energy sources in total energy consumption (%)	30%
Total energy consumption (MWh)	11,626.4
ENERGY INTENSITY (MWh / net sales)	
Energy intensity	0.00004

Gross Scope 1, 2, 3 and total GHG emissions (E1-6)

Greenhouse gas emissions	2024
Scope 1 greenhouse gas emissions	
Scope 1 gross greenhouse gas emissions (tCO ₂ eq.)	2,038.3
Percentage of Scope 1 greenhouse gas emissions covered by regulated emissions trading schemes (%)	0.0%
Scope 2 greenhouse gas emissions	
Location-based gross emissions of greenhouse gases (tCO ₂ eq.)	2,651.1
Market-based gross Scope 2 emissions of greenhouse gases (tCO ₂ eq.)	509.7
Significant Scope 3 greenhouse gas emissions	
Total indirect (Scope 3) gross greenhouse gas emissions (tCO ₂ eq.)	76,480
1 Purchased goods and services	68,732
2 Capital goods	246
3 Fuel and energy related activities (not included in Scope 1 or 2 emissions)	787
4 Upstream transport and distribution	167
5 Operational waste	3,759
6 Business travel	336
7 Commuting of employees	34
8 Upstream leased assets	-
9 Downstream transport	-
10 Processing of products sold	-
11 Use of products sold	2,253
12 End-of-life handling of sold products	166
13 Downstream leased assets	-
14 Franchising	-
15 Investments	-
Total greenhouse gas emissions	
Total greenhouse gas emissions (location-based) (tCO ₂ eq.)	81,169
Total greenhouse gas emissions (market-based) (tCO ₂ eq.)	79,028

Greenhouse gas emissions intensity	2024
Greenhouse gas intensity based on net sales, Scope 1, 2, 3 (location-based), tCO ₂ eq / EUR	0.0002
Greenhouse gas intensity based on net sales, Scope 1, 2, 3 (market-based), tCO ₂ eq / EUR	0.0002

Measurement basis

According to the GHG Protocol standards, the mandatory greenhouse gas emission categories for greenhouse gas emissions calculation are Scopes 1, 2, and 3. The greenhouse gas emissions calculation has determined the climate impact of Consti's own operations and value chains. In the calculation, different greenhouse gas emissions have been converted into carbon dioxide equivalent tonnes (tCO₂eq). Emission factors are updated annually to ensure accuracy. By categorising emissions into different emission categories, the aim is to avoid double counting. The calculation approach is based on operational control in accordance with GHG protocol standards.

The calculation results undergo internal quality assurance. If estimates, assumptions, or limitations are used in the calculation, they are reported separately. Verification of the calculations is part of the sustainability report verification.

The most common and well-known calculation guideline for determining the carbon footprint is the international greenhouse gas emissions protocol (Greenhouse Gas Protocol), which provides a framework for calculation and its scope and sets guidelines for documenting the input data used and reporting the results.

Scope 1 emissions describe Consti's direct greenhouse gas emissions from sources owned or controlled by Consti. The calculation covers, among other things, emissions from the fuel consumption of vehicles and direct emissions from energy consumption at construction sites. Scope 1 emission calculation is based on fuel-specific emission factors provided by fuel suppliers to Consti or on applicable nationally or internationally recorded emission factors.

Scope 2 emissions describe indirect greenhouse gas emissions that arise from the use of purchased energy by Consti, such as electricity or district heating. Consumption data for emission calculations is collected directly from suppliers, their external reporting systems or Consti's own operational systems. The emission factor for electricity used at offices is obtained either directly from energy suppliers or from applicable nationally or internationally reported emission factors. The applicable emission factors do not specify the percentage of biomass or biogenic carbon dioxide.

Market-based calculation takes into account Consti's energy procurement choices, such as certificates for fossil-free energy or purchase agreements with fossil-free energy suppliers.

Location-based calculation is based on applicable national or international average emission factors and does not take into account the company's own energy procurement choices.

Scope 3 emissions describe indirect greenhouse gas emissions generated elsewhere in Consti's value chain, including upstream and downstream value chains. All Scope 3 emission categories that were identified as material for Consti's operations were included in the calculation. Consti's reported Scope 3 emissions include greenhouse gas emissions from the following emission categories:

- 1) purchased goods and services,
2) capital goods,
3) fuel and energy-related activities (which are not included in Scope 1 or 2 emissions),
4) upstream transportation and distribution,
5) waste generated in operations,
6) business travel,
7) employee commuting,
11) use of sold products and
12) end-of-life treatment of sold products. Other emission sources, such as franchising operations, are not material for Consti's business.

The waste data is described in more detail in section 2.3 E5 *Resource use and circular economy - 2.3.1 Goals*.

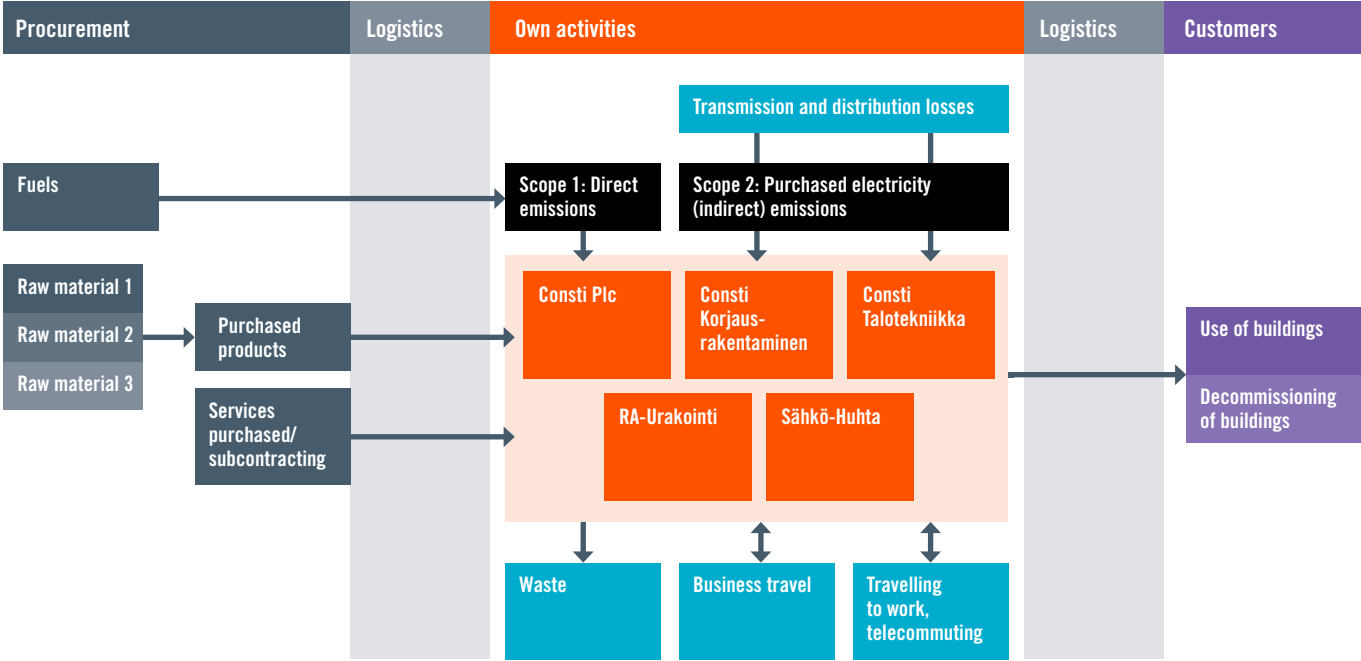
In Consti's Scope 3 calculation, the following standards applicable to carbon footprint calculation have been used:

- The Corporate Accounting and Reporting Standard
 - The Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

The calculation of Scope 3 emissions take into account the GHG emissions of the parent company and subsidiaries, not the emissions of investment targets.



Content of Consti's emissions calculation



The Scope 3 calculation was performed by Nordic Impact Oy. The input data used in the calculation were obtained from Consti's operational systems, partners, suppliers or other applicable sources. Different emission factors were used for each input unit in the calculation. Additionally, other conversion factors may have been used to support the calculation.

Before performing the calculation, the emissions calculation consultant reviewed the baseline data and assigned the most descriptive emission factors to them. The accuracy of the baseline data and corresponding emission factors was assessed indicatively using a three-level scale: "accurate," "moderate," "inaccurate." The criteria in the accompanying table were used as the evaluation scale for data accuracy.

The Scope 3 inventory is calculated in CO₂ equivalent tonnes. The calculation results have undergone internal quality assurance. In the absence of accurate data, assumptions have been used in the calculation. For the emission calculation of purchased goods and services, the input data was Consti's actual cost data from purchase invoices classified by value, and the emission factors used were spend-based emission factors, which are business area specific estimates of emissions based on input-output modelling. The emission calculation for fuel and energy procurement was based on Consti's actual fuel and energy consumption data. The emission data for waste calculation was based on emission reports provided by waste companies used by Consti. The emission calculation for purchased logistics was based on the actual cost data of purchased freight and spend-based emission factors. The emissions caused by business travel were calculated based on the unit of operational data, either using average emission data for passenger cars or spend-based emission factors. The emission

ACCURATE	MODERATE	INACCURATE
Emission source directly measurable.	The source of emissions can only be measured indirectly.	Source estimated indicatively/not available.
Emission factor primary.	Emission factor secondary.	Emission factor indicative.

calculation for commuting was based on the results of a commuting survey conducted for the staff at Consti's main office and emission factors for passenger cars (gasoline/diesel/electric car) and public transport (bus/train/metro/tram) based on the distance travelled. The greenhouse gas emissions caused by the end-use and disposal of sold products include the energy consumption of Consti's new construction projects completed during the calculation year during the use of the buildings and the assumption of demolition processes at the end of the buildings' life cycle. The input data for the calculation is based on life cycle assessment reports (LCA) of construction projects or, secondarily, for example, area-based estimates of energy consumption during the use of buildings. The main sources for the emission factors used in the calculation are global databases such as EXIOBASE and UK Government GHG Conversion Factors for Company Reporting, in addition to which, for example, Traficom's data on passenger car emissions has been used.

Scope 1, 2, and 3 emission calculation has been externally verified in connection with the verification of this sustainability report.

Consti's transition plan



Theme	Measures taken in 2024	Targets 2030 Scope 1 and 2: -70% Scope 3: -10%, Base year 2024		Targets 2035 Scope 1 and 2: -100% Scope 3: -25%, Base year 2024	Targets 2050 Scope 1 and 2: -100% Scope 3: -50 %, Base year 2024
Scope1 and 2	Scope 1 and 2 calculation	Gradual transition of the vehicle fleet and machinery to emission-free energy sources			Emission-free own operations
		Gradual transition to emission-free energy sources in offices			
		Gradual transition to emission-free energy sources at worksites			
Scope 3	Scope 3 calculation	Exploring opportunities for reducing emissions with partners			Business processes, procedures and procurement are based on the requirements of sustainable business and their maintenance and continuous improvement
	Examination of the comprehensive recycling rate of waste	Cost and suitability estimates of low-emission services and materials	Deployment of low-emission services and materials		
		A development plan outlining the required standards and measures to achieve the emission reduction potential, based on suitability assessments	Implementation and monitoring of suppliers' ESG responsibility requirements		
		Monitoring the achievement of sustainability targets and emission reduction potential			
		Waste recycling target 80%		Waste recycling target 85%	Waste recycling target of 90% and utilisation of the circular economy as part of the services provided
	Exploring the potential for utilising the circular economy in business operations	Setting circular economy targets and leveraging circular economy opportunities in our own service offering			
Assessment of the prerequisites, requirements and impacts of sustainable business	Mapping the impacts and necessary measures	Developing business processes and practices to meet sustainability requirements			Business processes, procedures and procurement activities are based on the requirements of sustainable business and their maintenance and continuous improvement
	Taking sustainability and customer needs into account in the service offering	Developing and offering solutions for energy efficiency	Incorporating services that support energy efficiency and sustainable development into the service offering		
			Integrating sustainability targets into performance-based compensation for roles and tasks that promote these targets		
			Collaboration with customers and stakeholders to achieve customer needs and sustainability goals		

2.2.5 Transition plan (E1-1, E1-7, E1-8, E1-9)

The goal of the Paris Agreement is to keep the global average temperature increase well below 2 degrees Celsius, aiming to limit the average temperature increase to 1.5 degrees Celsius, compared to pre-industrial times. Consti aims to mitigate climate change with its actions and has set emission reduction targets, taking into account the update of the Confederation of Finnish Construction Industries RT's Roadmap for Low-Carbon Construction Industries 2035⁸ and Green Building Finland's Action Plan for a Carbon-Neutral Built Environment⁹. Climate targets are not science-based.

Consti aims for its own operations (Scope 1 and Scope 2) to be carbon neutral by 2035.

To clarify monitoring and comparison of results, Consti has decided to use the 2024 emissions as the baseline for Scope 1-3 emissions in its transition plan. Consti's transition plan is based on Scope 1, 2, and 3 emission calculations¹⁰. The majority of Consti's emissions come from Scope 3 emissions in the value chain. The most significant emission reduction targets by 2030 are: reducing emissions from energy consumption at construction sites, requiring suppliers to provide emission data on significant material groups, mapping new low-carbon materials, promoting the circular economy and efficient recycling of waste.

Consti also continues to develop climate-friendly services.

In its transition plan, Consti does not use financed greenhouse gas removals to offset its own emissions.

Consti has utilised climate scenarios based on the identification of climate-related hazards and the assessment of exposure and sensitivity¹¹.

Consti has investigated the cost impacts^{12,13}, related to Scope 1 and Scope 2 emissions to support the implementation of its transition plan.

Consti's strategy aims to mitigate climate change. The transition plan will be integrated into the business strategy and financial planning and aligned with them during 2025–2027. The implementation of the transition plan, which also includes Scope 3 emissions, will begin in 2025. The transition plan has been approved by Consti's Management Team and Board of Directors.

⁸ Gaia (2024) Vähähiilinen rakennusteollisuus 2023 – tiekartan päivitys. [Low carbon construction industry 2023 – roadmap update]. https://rt.fi/wp-content/uploads/2024/06/Loppuraportti-RT-vahahiilisyy-7.6.2024_FINAL.pdf

⁹ FIGBC. (2022). Hiilineutraalin rakennetun ympäristön toimintaohjelma. [Action Plan for a Carbon-Neutral Built Environment]. <https://figbc.fi/julkaisut/hiilineutraalin-rakennetun-ympariston-toimintaohjelma>

¹⁰ The presented climate targets are not science-based

¹¹ Consti has not analysed various climate scenarios to identify and assess physical risks, as well as transition risks and opportunities, in the short, medium, and long term.

¹² Consti has not conducted an analysis or quantitative assessment of the company's investments and financing that support the implementation of its transition plan.

¹³ Consti has not conducted a qualitative assessment of the potential embedded greenhouse gas emissions of the company's key assets and products. Consti does not currently have internal carbon pricing mechanisms in place.

2.3 E5 Resource use and circular economy

2.3.1 Goals (E5-3)

Consti’s goal for the recycling rate of construction site waste is at least the target of 70 percent mentioned in the Waste Decree (978/2021, §27). In 2024, the average recycling rate of Consti’s own construction site waste was 70 percent, compared to about 56 percent the previous year.

Section 2.2.5 of Chapter 2. E1 *Transition plan* presents Consti’s objectives and measures to promote circular economy.

Goals for 2050:

- 2030**
- Consti’s recycling rate 80%
 - Exploring the potential of circular economy in business.
- 2035**
- Consti’s recycling rate 85%
 - Setting circular economy goals and leveraging circular economy opportunities in service offerings
- 2050**
- Consti’s recycling rate 90%
 - Utilising circular economy as part of the offered services

Key sustainability factors	Consti's sustainability targets for the strategy period 2024–2027	Goals for 2024	Indicator
Circular economy: Demolition waste, packaging waste, surplus waste	Construction site waste recycling rate 70%	Construction site waste recycling rate 70%	Recycling rate, %

Use and disposal of waste

Total amount of waste diverted from disposal	Prepared for reuse	Recycling	Other recovery operations	Total
Non-hazardous waste	6.7	11,220.9	3,473.4	14,701.1
Hazardous waste	0,0	2.5	28.6	31.1
Total	6.7	11,223.4	3,502.0	14,732.1

Amount of waste diverted for disposal	Incineration (without energy recovery)	Landfilling	Other disposal	Total
Non-hazardous waste	0.0	174.4	0.0	174.4
Hazardous waste	4.0	1,022.5	20.1	1,046.6
Total	4.0	1,196.9	20.1	1,221.0

Total waste generated	Exploitation	Final treatment	Total
Non-hazardous waste	14,701.1	174.4	14,875.5
Hazardous waste	31.1	1,046.6	1,077.6
Total	14,732.1	1,221.0	15,953.1

Non-recycled waste	Total amount	Percentage (%)	Recycling rate
Total amount	4,723.0	30%	70%

2.3.2 Material impacts, risks, and opportunities (IRO-1)

The material impacts, risks, and opportunities related to resource use and the circular economy have been identified in the company’s double materiality analysis, which is described in section 1.4.1. The analysis examined Consti’s operations in different locations and industries from the perspective of resource use.

The most significant environmental risks related to resources other than energy in Consti’s operations arise from potential emissions of harmful substances to the environment, for example, due to negligence in handling or disposing of demolition waste. Additionally, noise, vibration, and construction dust may spread to the surrounding environment during operations. Consti’s principles and measures to manage harmful impacts are discussed in sections 2.3.3 and 2.3.4 of this chapter, as well as in the table on *Material impacts, risks, and opportunities related to resource use and the circular economy*.

Impacts on the value chain

The impacts of waste sorting can extend widely throughout the value chain. Waste sorting may lead to stricter requirements for subcontractors performing demolition work and material suppliers, affecting their production and delivery processes. Transportation companies may need to adapt their processes to handle separate waste streams, which can increase logistics costs but also improve efficiency and environmental friendliness. Consumers may appreciate the company’s environmentally friendly practices, enhancing the company’s reputation. Waste sorting facilitates the work of recycling companies by providing pre-sorted materials, improving recycling process efficiency and reducing costs.

Material impacts, risks, and opportunities related to resource use and the circular economy

Sustainability area		Material impacts, risks and opportunities	Management	Stakeholder insight
Waste and circular economy: Consti's impact				
E5-5 Consti's operations generate waste	▲	Opportunity: Achieving circular economy goals will reduce the amount of waste and waste treatment operations and costs. The risk of sanctions is reduced. Reduces the need for new raw materials. If Consti succeeds in handling waste extensively in its value chain, it will support the achievement of its customers' environmental targets.	Consti's target is a recycling rate of 70%. The amount of material needed on site is planned as carefully as possible and the materials are protected so that they are not damaged or wasted. In some tasks, waste can also be reduced by prefabrication. Waste treatment is carefully planned. Up-to-date waste reporting helps in achieving and monitoring the goal.	All Consti's stakeholders consider waste recycling to be a significant sustainability factor that Consti can positively influence.
	▼	Risk: The ability of production planning to minimise waste generation and manage waste effectively. If Consti fails to meet recycling targets, the amount of waste will not decrease, and waste management costs will rise. Additionally, the risk of sanctions increases.		
Waste and circular economy: Impact on Consti				
E5-5 Consti's operations generate waste	▲	Opportunity: Opportunity to develop Consti's own business and new business models. Encourages competence development and production efficiency and generates cost savings. Expertise related to waste and circular economy can give Consti a competitive advantage as a partner.	Consti guides employees in the value chain to act in accordance with Consti's recycling targets, for example in site orientation. Obligations supporting sustainability objectives are included in supply agreements.	Consti's customers and personnel consider waste and recycling expertise to be a significant sustainability factor that can have a positive impact on Consti's business.
	▼	Risk: The ability of demolition contractors to sort, report and recycle waste from demolition work poses a risk to the achievement of Consti's targets. If Consti's value chain does not reach the waste reduction and recycling target, it may result in additional costs and penalties for Consti. It would also weaken the achievement of Consti's customers' targets and Consti's competitiveness as a partner.		

2.3.3 Operating principles (E5-1)

Consti complies with the legislation and official regulations regarding the recycling and disposal of materials used in construction. The operations also take into account international agreements and the EU's energy consumption and greenhouse gas reduction targets. Consti is committed to reducing its emissions in accordance with its transition plan. In its environmental principles, Consti is also committed to reducing waste and recycling efficiently. Detailed recycling targets and circular economy goals are presented in chapter 2 E1 *Climate Change*, section 2.2.5 *Transition Plan*. The recycling rate is increased in cooperation with waste management partners.

Material use is optimised through good planning. Installed equipment and materials are valuable, and waste is minimised by ordering products systematically. Existing building materials and components can also be reused in planning, reducing the need for new materials and conserving natural resources. By designing building components and technical systems so that repairs and replacements can be made without extensive demolition work, the amount of waste generated can be reduced. Material efficiency can be improved through more precise planning and the use of dimensioned building materials. Consti aims to use any surplus material in other projects where applicable. Surplus material is the difference between the amount of material ordered for a specific phase of the construction site and the amount used in that phase to achieve the desired outcome.

Recycled material is material that has been removed from a site and processed into raw material for new material or reused as is.

Consti monitors the development of circular economy practices, among other things, as a member of the Helsinki Circular Economy Cluster. So far, recycled materials or recycled building components are not used in renovation.

Both Consti Korjausrakentaminen Oy and Consti Talotekniikka Oy have RALA environmental and safety certificates. RALA certification is a management system evaluation procedure developed for the Finnish construction industry based on ISO systems, supporting the development of operations in line with sustainable development.

The implementation of operating principles is the responsibility of the business directors in addition to the CEO.

2.3.4 Measures (E5-2, E5-4, E5-5)

Reducing the harmful environmental impacts of construction sites means minimising energy consumption and minimising noise, dust, and waste generated from site traffic, demolition work, and construction, as well as careful handling of environmentally harmful substances. Site-specific environmental plans identify environmental risks and plan measures to prevent harm and prepare to combat harmful impacts. The harmful impacts of construction projects on the environment are also reduced by developing staff competence.

Waste and by-products

According to the Waste Act, waste must be sorted at its place of origin, i.e., on Consti's construction sites. Consti's construction sites prepare project-specific waste management plans together with the waste management contractor. The waste management provider prepares a waste transfer document for each load, enters the information in the SIIRTO register and reports waste data by site.

Consti complies with waste management legislation, regulations, and guidelines and monitors their development. Environmental competence is developed through continuous training and communication with staff. Partners commit to acting responsibly towards the environment by signing a subcontracting agreement.

The company's key strategic measures related to resource use and the circular economy are:

- Transitioning to the use of fossil-free energy in stages. More information on this can be found in section 2.2.5 of this chapter – *Transition Plan*.
- Improving energy efficiency by optimising the use of electricity, heat, and fuels. More information on this can be found in section E1 *Climate Change* of this chapter.
- Increasing the recycling rate of waste.

Resource inflows and outflows related to products and services

Consti has not assessed resource inflows or outflows related to products and services as a significant sustainability factor. The materials and products used in Consti's renovation projects are mainly defined by the client and their designers, so Consti does not have a direct impact on the proportion of materials and products designed according to circular economy principles.

Consti has not yet identified a suitable method for measuring the amount of surplus material or a measurement method related to the utilisation of surplus materials.

Measurement criteria

Waste management is a licensed activity supervised by the authorities. Consti's reported waste data is based on information reported to Consti by waste management contractors.

Waste quantities include waste transferred from the construction site, including material and energy recovery, landfill disposal, and hazardous waste treatment.

The metric has not been validated by an external party.

3 S-SOCIAL RESPONSIBILITY

Consti's social responsibility review covers Consti's own workforce and the workforce of suppliers (subcontractors) providing construction services to Consti from the value chain. In accordance with ESRS standards, Consti's own workforce (Consti employees) covers personnel employed by Consti and those working for Consti through temporary employment agencies or through their own company. At the end of 2024, the share of those working through temporary employment agencies or their own company of Consti's own workforce converted into full-time equivalent (FTE) was approximately seven percent.

Consti aims to provide an equal and skill-development encouraging work environment for both its own workforce and, in particular, for employees of construction service providers in the value chain.

3.1. S1 Own workforce

3.1.1 Goals (S1-5)

Consti's key social responsibility goals relate to health and safety, equality and human rights, and skills development.

The indicators for achieving goals related to the own workforce include the proportion of women in the workforce, the low proportion of fixed-term employment contracts, sick leave absences, accident frequency, and staff turnover. The goals, progress, and indicators are presented in the table below.

Own workforce

Key sustainability factors	Consti's sustainability targets for the strategy period 2024–2027	Goals for 2024	Indicator
Own workforce: Equality and human rights	To provide our own personnel with an equal working environment that encourages competence development	Increasing the number of women in different personnel groups	Share of women, % of total person
		Fixed-term employment contracts < 5%	Fixed-term employment, % of total person
Own workforce: Health and safety at work	Promoting well-being at work	Promoting work ability – task-specific written guidelines for the most physically demanding tasks	Reducing absenteeism due to musculoskeletal disorders
		Fewer sickness absences than before. Accident frequency <10	Sick leave absences, % and accident frequency
Own workforce: Training and skills development	Competence and leadership development	Creating a leadership development program for line managers, a framework for skills development	Realised/Not Realised
	Committed and healthy personnel	Committed and healthy personnel. Employee turnover < 10%	Employee turnover, %
		Age balance	Age distribution, all employees

3.1.2 Material impacts, risks, and opportunities (IRO-1)

The material impacts, risks, and opportunities related to Consti's own workforce have been identified and assessed as part of the double materiality analysis described in section 1.4.1. The most significant impacts, risks, and opportunities related to the own workforce concern health and safety, as well as training and skills development. Consti has not identified a significant risk of child or forced labour in its own workforce materiality analysis.

The impacts related to health and safety most clearly affect site personnel regardless of employment status. Health and safety risks can result from long-term work, such as typical strenuous work postures in construction or exposure to harmful substances, or sudden accidents such as cuts or falls. The impacts related to training and skills development are emphasised for Consti's employed workforce. Consti's principles and measures to manage harmful impacts are discussed in sections 3.1.3 - 3.1.5 of this chapter and are also described in the table *Material impacts, risks, and opportunities related to the own workforce*.

According to Consti's assessment, climate change and the related transition plan do not have significant impacts on its own workforce. Climate change and Consti's transition plan slightly increase the need for skills related to energy efficiency services, facade repairs, and maintenance services offered to customers. Increasing the recycling rate of construction site waste also requires continuous training for staff. If Consti succeeds in strengthening its sustainability expertise required by climate change, it has the opportunity to offer more jobs and strengthen its position as a desirable employer. If Consti fails to increase and maintain sufficient sustainability expertise, its reputation as an attractive employer and partner may suffer.

Material impacts, risks and opportunities related to own workforce

Sustainability area		Material impacts, risks and opportunities	Management	Stakeholder insight
Education and skills development, health and safety: Consti's impact				According to stakeholders, Consti's opportunities to have a positive impact on the training and skills development of both its own personnel and those in the value chain are significant.
Consti trains and develops the skills of its personnel.	▲	Opportunity: Developing and maintaining competence at a sufficient level enables sustainable operations and the provision of high-quality services that support sustainability, as well as increases job satisfaction and commitment. An opportunity to develop the business of Consti and other actors in the value chain, as well as to develop new business models and save costs. Opportunity to develop know-how, improve production efficiency and save costs in the value chain on a broad scale.	Consti Academy offers competence development services to all Consti employees: field-specific qualification training and special competence training, taking into account the qualification requirements and recommendations of the construction industry. Occupational safety expertise will be improved by e.g., developing proactive safety work and safety management.	
	▼	Risk: Failure to improve the effectiveness of education and skills development may be reflected in poor quality of work and increased costs, which causes reputational damage to both Consti and the entire industry. It also reduces job satisfaction and commitment and can increase staff turnover. Insufficient skills weaken competitiveness and opportunities to provide services that support sustainability.	The starting point is that improving occupational safety is everyone's responsibility. Occupational safety principles and management are based on Finnish occupational safety legislation and the policies of the Confederation of Finnish Construction Industries RT. Consti complies with labour legislation and the construction industry's Collective bargaining agreement (CBA) and recommendations, and it has a RALA occupational safety certificate. Occupational safety observations are encouraged. Grievances can be reported anonymously. Early intervention model in use. Personnel have more extensive occupational health care services than the statutory obligation. Supporting work-life balance by offering e.g. teleworking opportunities and different forms of working hours depending on the nature of work. Possibility of sports and cultural benefits.	
Consti takes care of the health and safety of its personnel.	▲	Opportunity: A healthy and safe working environment is a fundamental right and health and safety measures have a positive impact on workers' overall physical and mental well-being and ability to work. A healthy and safe working environment increases job satisfaction and commitment and is positively correlated with the quality of work, all of which also bring cost savings.		
	▼	Risk: Inadequate measures to ensure health and safety would have a negative impact on workers' overall physical and mental well-being and ability to work. The risk of increased turnover and occupational accidents increases.		
Education and skills development, health and safety: Impact on Consti				
Training and skills development. Health and safety.	▲	Opportunity: Expertise supports sustainable operations, increases Consti's service offering, reduces qualitative risks and related financial costs. It also strengthens Consti's reputation as a competent and sought-after partner.	Supporting value chain competence through guidelines, requirements and monitoring. Enabling and encouraging safety observations. Cooperation with educational institutions in the field and provision of internships.	
	▼	Risk: Insufficient training and competence in the field would increase Consti's role in ensuring competence in Consti's tasks and the resulting costs. It would also make it more difficult for Consti to find good partners, weaken its service offering, increase qualitative risks and related financial costs, especially for Consti. An unskilled workforce and deficiencies in a safe and healthy working environment would also be a significant reputational risk.		

3.1.3 Operating principles (S1-1)

In addition to legislation, Consti's operating principles guiding responsible personnel activities consist of human rights principles, ethical guidelines, personnel management processes, and the Consti Way operating model. The operating principles cover Consti's entire personnel. The goal is for everyone in the work community to understand their role and the significance of their work in implementing the strategy. The Consti Way, or Consti's way of operating, is based on five elements: cooperation and openness, common operating models, performance management, understanding the customer, and continuous improvement.

The implementation of operating principles is supported by occupational safety, equality, and non-discrimination plans, as well as ethical guidelines, which are applied on all construction sites and thus cover both the own workforce and subcontractors working on the sites. The most essential occupational safety training is targeted at the own workforce. The operating principles are introduced during orientation and are available on Consti's intranet, for instance under a section targeted at new employees. The implementation of operating principles and communication with staff, and consideration of staff feedback in the company's operating methods, are the responsibility of the Business Area Directors together with the HR-Director in addition to the CEO.

Equal treatment and equal opportunities for all

Consti is committed to promoting the diversity and equality of its own workforce. This work is guided by Consti's ethical guidelines and equality and non-discrimination plans. The ethical guidelines and non-discrimination principles include a prohibition on discrimination based on gender, age, origin, race, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, pregnancy, health status, disability, sexual orientation, or other reasons related to a person's identity. Indirect discrimination is also prohibited. The prohibition of discrimination applies regardless of whether the employment relationship is permanent, fixed term, or part-time. The principles of equal treatment also cover subcontractors and other stakeholders.

Social protection

All Consti employees are covered by statutory accident insurance and occupational health care that exceeds the statutory minimum, as well as statutory pension schemes, unemployment benefits, and parental leave. Information on health services is available on the intranet, which is accessible to all employees with a contract of employment.

Training and skills development

Consti's personnel management processes guide leadership and skills development. Consti's management and HR function are responsible for implementing the personnel management principles. Leadership and supervisory work are supported by training, which includes familiarisation with Consti's management practices.

Working conditions

Consti complies with Finnish labour legislation and is committed to fair employment terms. Consti complies with the applicable collective agreements in its business operations. Consti employees have the right to join or not join a trade union.

Health and safety

Consti is committed to promoting the physical and mental well-being of its staff. Consti's Management Team guides the promotion and maintenance of work well-being and work ability. The promotion of work well-being and work ability is proactive, aiming to identify factors threatening employees' work ability, initiate measures, and maintain health throughout the career.

Consti's occupational safety is guided by a safety management system consisting of safety principles, processes, and work instructions. The implementation of safety principles is the responsibility of the CEO of the Consti Group according to the requirements defined by the Management Team. The roles and responsibilities of occupational safety are defined in the safety management principles described on the intranet.

Consti has RALA occupational safety certification. The development of operations is based on annual development projects recorded in the occupational safety action programme. Consti's safety group, which includes occupational safety personnel from all business areas, plays an active role in developing operations.

Other work-related rights

Consti operates in accordance with the UN Guiding Principles on Business and Human Rights and respects internationally recognised human rights in line with the UN Universal Declaration of Human Rights and the International Labour Organisation's (ILO) fundamental principles and rights at work.

3.1.4 Communication on impacts with the workforce and workforce representatives (S1-2)

Collective agreements

Consti complies with the Employment Contracts Act, the collective agreements applicable to its business operations and negotiates local agreements with employee representatives to develop cooperation between the employer and employee groups.

Cooperation activities

The goal of cooperation is to develop the company's operations and employees' opportunities to influence the company's decision-making regarding their work, working conditions, and position in the company. Consti organises cooperation events four times a year with representatives of both business area specific personnel groups (formerly the Cooperation Committee + Occupational Safety Committee) and the group's personnel representatives.

Employee survey

Consti conducts an employee survey measuring job satisfaction every two years, which assesses the employees' views on how different operating principles are implemented in practice. The HR function is responsible for conducting the employee survey, supporting the company's management in handling the survey results and considering them in decision-making. The results are reviewed at different organisational levels and with employee representatives. Supervisors and teams are offered training and support in handling the results and forming related development measures. The key results of the employee survey conducted in autumn 2024 are as follows:

Strengths

- My skills are sufficient for the requirements of my job
- My health will allow me to continue working in my current position two years from now
- I know what is expected of me in my work

Areas for improvement

- I receive recognition for a job well done
- I am encouraged and supported to engage in activities that improve my health and well-being
- My immediate supervisor provides inspiring long-term goals

The analysis of the employee survey results is conducted by business area and unit, and an action plan is prepared at the unit level. The response rate for the employee survey was 68 percent.

Occupational safety

Matters related to the promotion of occupational safety are regularly discussed within the personnel groups of the group companies, among different groups of their own workforce. Consti also has a Safety Group that meets twice a year to discuss current safety issues at the group level and to plan the events of the coming six-month period. One of the Business Area Directors serves as the Chair. The occupational safety personnel prepare an annual occupational safety action plan, based on which the Occupational Safety Manager, in cooperation with the occupational safety representatives, defines the key development measures related to occupational safety. The occupational safety action programme is discussed at the company level in personnel groups. Occupational safety is promoted and supported, among other things, through safety briefings.

Ethical reporting channel

Employees can report any ethical issues or legal violations they observe to their supervisor, local management, HR, or through the electronic reporting channel (whistleblowing channel). Consti does not tolerate retaliation against whistleblowers. Reports can also be made anonymously if desired. More details about the reporting channel can be found in section G1 *Governance of sustainability*.

Working conditions, health, and safety

Consti's risk assessment and management are supported by the HSEQ system, which is intended for recording and monitoring safety observations, accidents, near misses, corrective actions, and safety briefings and tours. All employees can submit notifications.

3.1.5 Actions (S1-4, S1-12)

Equal treatment and equal opportunities for all

One of the focus areas of the Consti Way framework is cooperation and transparency, which consists of elements such as equal treatment, sharing information and expertise, building and developing teams, and corporate-level collaboration. As part of continuous development, employees are regularly trained, and it is ensured that all target groups participate in leadership and supervisory training. The 2024 training sessions covered topics such as employment matters, construction law, and various software supporting construction projects.

The traditional male dominance in the construction industry has been recognised, and Consti aims to increase the proportion of women in every employee group and organisational level. In 2024, the number of women did not increase in different employee groups. In 2024, Consti updated its equality and non-discrimination plan and defined metrics and actions to promote equality, non-discrimination, and diversity. The age distribution of Consti's own workforce corresponds to the typical age structure in the construction industry. Due

to the generally hazardous nature of construction work, there are no disabled persons working on Consti's construction sites.

The realisation of equality and a respectful work culture is monitored through an employee survey every two years. According to the 2024 employee survey, "fair and equal" treatment was Consti's most apparent strength as an employer. Equality was perceived to be best realised between genders. Differences in responses regarding the realisation of equality related to age, gender, religion, belief, and cultural background were relatively minor.

Training and skills development

The availability and retention of skilled personnel are sought to be ensured through development programmes offered by the employer, as well as by investing in collaboration with educational institutions and enhancing employer attractiveness.

Consti actively encourages its employees to develop their skills and participate in various training programmes. For office staff, a personal development plan is created as part of the development discussions to support skill development at both the individual and team levels. The development plan outlines, in collaboration with the employee, how the employee's skills will be developed throughout the year. Development measures are planned together with the supervisor. To promote continuous development, Consti has the Consti Academy, through which training and development programmes are offered.

The measures used to assess the implementation of skill development include the number of personal development plans and the results of employee surveys related to the opportunities for utilising one's own skills.

Consti employees have a performance bonus system. Personal goals and development areas are set, and progress is monitored in development discussions, which each employee has with their supervisor at least once a year. The performance bonus system is based on both qualitative and financial goals. The performance bonus system does not apply to trainees, thesis workers, employees who have worked less than four months during the bonus year, or those who are not employed at the time of bonus payment. Successes are also rewarded on construction sites. The best construction sites are awarded annually in a competition between sites, with evaluation criteria related to quality, safety, customer feedback, schedule adherence, financial performance, and environmental issues.

Working conditions, health, and safety

Consti's HR management uses a common HR system across the group, minimising the risk of non-compliant working conditions or wages. Depending on the nature of the work, flexible working hours and a hybrid work model, where remote work can be done part of the week, are in place. The company supports employee well-being at different stages of life and enables long careers by offering, for example, job rotation.

At Consti, safety management is based on the prevention of hazards and risks. Risk assessments are conducted regularly, and employees receive safety training on site-specific hazards. General safety training for construction sites, known as ePerehdyty, is mandatory for everyone working on Consti's sites. In addition to ePerehdyty, occupational safety card training and task-specific qualifications (e.g., electrical safety) are required. Site-specific safety training is available in different languages as needed.

Employees and others affected by the construction site are encouraged to make safety observations. Accidents are prevented through common safety standards, proactive measures such as risk assessments, safety observations, safety tours, and safety training. The most common causes of accidents are injuries to hands and feet. To achieve the zero-accident goal, long-term safety focus areas have been defined, including common safety principles, comprehensive risk assessment,

and proactive safety development. Actions based on these focus areas guide the development of safety work, set key goals for the annual and strategic period, and improve the predictability of safety work. The main focus area for safety work in 2024 was the development of safety skills and work ability.

Safety observations are recorded in Consti's electronic system. A notification is sent to the site, after which corrective actions are planned for the observation. Safety observations are handled on a site and unit basis. All accidents leading to absence, and potentially serious hazards are investigated according to a uniform process. The investigation is led by the Unit Manager, with the Work Manager leading the investigation in the renovation business area and the Installation Manager in the building technology business area. The investigation is conducted within two weeks of the incident. The goal is to identify possible deficiencies in safety management and create conditions to avoid similar cases.

Health care assesses the health status of individuals in relation to job requirements and workplace exposures through health examinations. The health services for temporary workers are provided by their employer. Common occupational diseases in renovation work include allergic reactions caused by dust or chemicals on the skin or respiratory system. Workplace conditions are aimed to be as health and safety-friendly as possible by ensuring cleanliness, adequate ventilation, and ensuring the appropriateness and sufficiency of personal protective equipment.

Consti has models for rehabilitative activities, early support, and a substance abuse programme to support work performance. Supervisors are provided with guidance and training in managing work well-being. In 2024, supervisors were trained in early support as part of everyday management, and materials supporting the promotion of work well-being were updated.

Other work-related rights

Employment contracts at Consti are always formalised with a written employment contract, and Consti prefers permanent (indefinite) employment relationships.

The realisation of human rights is considered as part of the development of HR processes. Consti has procedures for handling employee personal data that all employees must follow. The data protection policy defines the principles and rules to be followed in all personal data processing. Health-related personal data of employees is handled only by designated individuals in accordance with data protection legislation and only in situations where the law requires it. Health-related data is stored separately from general employee personal data. Consti uses high-level technical and organisational means to ensure data protection and security, and the same is required from companies providing occupational health services as part of contracts.

3.1.6 Characteristics of own workforce (S1-6, S1-8, S1-9, S1-10, S1-11, S1-13, S1-14, S1-15, S1-16, S1-17)

Characteristics of employees of the company	2024
Number of employees	1,012
Women	128
Men	884
Permanent staff	992
Women	124
Men	868
Temporary staff	20
Women	4
Men	16
Total number of permanent employees who left during the reporting period	129
Turnover of permanent employees during the reporting period	12.7%
Employees working variable working hours	17
Women	6
Men	11
Staff in full-time employment	983
Women	116
Men	867
Part-time staff	12
Women	6
Men	6

The scope of collective bargaining agreements and dialogue between labor market parties, employees with an employment contract	2024
Collective agreements	
Employees covered by collective agreements as a percentage of total employees	90.1%
In the EEA area: whether it is covered by one or more collective bargaining agreements, and if so, the total proportion of employees under such agreement(s)	Operations only in Finland
Dialogue between labour market parties	
Total percentage of employees covered by employee representation	81.4%
Any agreements with the company's employees regarding representation, managed by a European Works Council, the works council of a European Company (SE), or the works council of a European Cooperative Society (SCE)	No contracts

Diversity metrics, employees with an employment contract	2024
Proportion of men and women in management, number	
Woman	1
Man	7
Proportion of men and women in management, %	
Woman	14%
Man	86%
Age distribution of senior management	
Under 30s	0
Ages 30–50	2
People over 50	6

Adequate salary, employees with an employment contract	2024
The pay is based on the generally applicable collective agreement for the sector	Yes
Health and safety	2024
Percentage of own workforce covered by the company's OSH management system*	93%
Proportion of employees with employment contracts in the company's workforce who are covered by the company's occupational safety and health management system	100%
Number of fatalities due to work-related injuries and work-related health issues within the company's own workforce	0
Accident frequency	7
Identified cases of work-related health issues, such as occupational diseases, among employees with employment contracts	1
For the company's own employees, the number of days lost due to occupational injuries, fatalities from workplace accidents, work-related health issues, and fatalities caused by such issues = lost days due to accidents	0
* Employees working through personnel leasing companies are covered by the occupational health and safety management system of the personnel leasing company. Independent contractors are legally responsible for their own occupational health and safety systems	
Indicators of earned income (pay gap and total earnings)	2024
Gender pay gap, employees with an employment contract	5.6%
Ratio between the person receiving the highest earned income and the median earnings of employees with an employment relationship in the enterprise	9.5
Cases, complaints and serious human rights implications	2024
Total number of cases of discrimination, including harassment, reported during the reporting period	2
Number of complaints submitted through channels available to the company's own workforce	1
The total amount of fines, penalties, and compensation paid as a result of the aforementioned cases and complaints	0
Identified serious human rights cases	0
Number of serious human rights cases related to the company's workforce	0
Total amount of fines, penalties and damages resulting from incidents	0
Training and skills development	2024
Completed performance appraisals / agreed, employees with an employment contract*	59%
Women (total)	57
Men (total)	219
Average training hours per person, employees with an employment contract	0.3
Women	2.0
Men	2.4
* Office employees	
Work-life balance indicators	2024
Percentage of persons entitled to family leave	100%
Percentage of persons on family leave by gender, employees with an employment contract	
Women	5.5%
Men	6.1%

Measurement criteria

The figures describing Consti's own workforce include employees with a contract of employment within the Consti Group. The data is collected from HR systems covering the entire Consti Group. The number of employees used in the calculations is reported as of the end of the reporting period (31 December2024). The accident frequency includes the company's entire workforce, i.e., employees, persons working through temporary employment agencies and self-employed persons, as well as employees of subcontractors working at Consti's construction sites. Development discussions are held with office employees. In accordance with the company's policy, development discussions are not held with worksite employees.

3.2 S2 Value chain employees

3.2.1 Goals (S2-5)

Consti aims for all actors in its value chain to operate sustainably and in accordance with Consti's sustainability principles. Consti has identified the employees of construction service providers (subcontractors) used by the company as a key sustainability theme in its operations. Consti aims to provide them with a fair, equal, and safe working environment. Consti strives to ensure that there is no use of child or forced labour, human trafficking, or other forms of modern slavery in its business and supply chain.

Key sustainability factors	Consti's sustainability targets for the strategy period 2024–2027	Goals for 2024	Indicator
Workers in the value chain: Health and safety	Providing the partners' personnel with an equal working environment that encourages competence development	Mapping and describing human rights processes	Realised/ Not Realised

3.2.2 Material impacts, risks, and opportunities (IRO-1)

The material impacts, risks, and opportunities related to value chain employees have been identified in the company's double materiality analysis, described in section 1.4.1 of chapter 1. Consti has analysed the material impacts, risks, and opportunities related to value chain employees at this stage only for the employees of construction service providers (subcontractors). The risks related to occupational safety and their main management methods are the same for both Consti's own workforce and subcontractors' employees, and are described in section S1 Own Workforce. The material impacts, risks, and opportunities related to Consti's subcontractors' employees and their management are described in the table below.

In sourcing materials, Consti strives to ensure the realisation of value chain employees' rights by using established and long-standing companies in the industry that report operating in accordance with sustainable business principles. Currently, Consti does not have reliable means to assess the value chain of material deliveries for the entire production chain of materials. The goal is to find these means in the coming years.

Material impacts, risks, and opportunities related to value chain employees

Sustainability area		Material impacts, risks and opportunities	Management	Stakeholder insight
Training and skills development of workers in the value chain, health and safety of workers in the value chain: Consti's impact				
Training and skills development	▲	Opportunity: Developing and maintaining the skills of both Consti's own employees and those of its value chain, particularly construction service providers, at a sufficient level enables the provision of sustainability-supporting services for Consti and its value chain. Enhancing skills can improve production efficiency and reduce costs. There is also an opportunity for expansion within the value chain and for versatile collaboration among value chain actors.	Supporting value chain competence through guidelines, requirements and monitoring. Cooperation with educational institutions in the field and provision of internships.	According to Consti's personnel, Consti's opportunity to have a positive impact on the development of the education and skills of employees in the value chain is significant.
	▲	Risk: Failure to improve the effectiveness of education and skills weakens opportunities to provide services that support sustainability and causes reputational damage to both Consti and its construction service providers and possibly the entire value chain.		
Health and safety	▲	Opportunity: A healthy and safe working environment is a fundamental right and increases job satisfaction and commitment, and correlates positively with well-being at work and quality of work. Health and safety measures have a positive impact on the work ability and commitment of all employees.	At Consti, the starting point is that improving occupational safety is everyone's responsibility. Occupational safety principles and management are based on Finnish occupational safety legislation and the policies of the Confederation of Finnish Construction Industries RT. Consti complies with labour legislation and the construction industry's Collective bargaining agreement (CBA) and recommendations, and it has a RALA occupational safety certificate. Occupational safety observations are encouraged. Grievances can be reported anonymously. Comprehensive identification and risk assessment of site-specific hazards. Processes to prevent the shadow economy.	
	▲	Risk: Inadequate measures to ensure health and safety would have a negative impact on the health, well-being, job satisfaction and commitment of all employees. The risk of accidents at work increases. Failure to combat the shadow economy may pose risks to health and safety. All this would weaken Consti's reputation as a partner throughout the value chain.		
Training and skills development of workers in the value chain, health and safety of workers in the value chain: Impact on Consti				
Training and skills development in the value chain. Health and safety in the value chain.	▲	Opportunity: Sufficient expertise in the value chain and investments in safety and health support Consti's service offering, reduce qualitative risks and related financial costs. Consti can rely on the quality and scheduling of the service provider's work. The expertise of the value chain, especially construction service providers, strengthens Consti's reputation as a partner throughout the value chain.	Consti ensures statutory qualifications and fulfilment of employer obligations before drawing up a contract and starting work.	According to Consti's personnel and partners, Consti's impact on the training and development of the skills of employees in its value chain and the impact of these actions on Consti's business is significant.
	▲	Risk: Deficiencies in the competence, safety and healthcare of employees in the value chain may cause serious safety risks, weaken the functionality of the value chain and increase costs incurred by Consti, for example, due to delays in work. Negative events and negligence also adversely affect Consti's reputation and may lead to exclusion from invitations to tender.		

3.2.3 Operating principles (S2-1)

The guidelines and principles of the safety management system cover not only Consti's own workforce but also the employees of service providers working in Consti's operations. In addition to legislation and Consti's safety principles, the responsibility related to value chain employees is guided by the ethical guidelines for partners approved by the company's board. Consti's material suppliers commit to Consti's ethical guidelines in order agreements. Consti's subcontractors commit to Consti's subcontracting programme, which includes Consti's ethical guidelines. The ethical guidelines include instructions related to the environment, social relations and human rights, and the prevention of corruption and bribery. Regarding human rights, the ethical guidelines are based on the UN Declaration of Human Rights and the OECD Guidelines for Responsible Business Conduct.

The implementation of operating principles is the responsibility of the Business Area Directors in addition to the CEO.

Working conditions, health, and safety

The roles and responsibilities related to occupational safety are defined in the principles of safety management. The responsibilities and a more detailed description of occupational safety measures related to the operating principles are presented in section S1 *Own Workforce*.

The ethical operating principles prepared by Consti for its partners oblige suppliers to provide their employees with a safe and healthy working environment to prevent accidents, injuries, and illnesses and to ensure that employees are aware of and have received sufficient training on Consti's operating principles and requirements.

The partner commits to Consti's ethical guidelines in all its activities. The partner is obliged to actively ensure and monitor the compliance of its own subcontractors throughout the supply chain. The ethical operating principles prepared by Consti for its partners include, among other things, the following work-related rights that suppliers must comply with:

- Human rights and equal treatment of employees
- Freedom of association
- Prohibition of harassment and discrimination
- Prohibition of child and forced labour, and the protection of young workers' rights
- Wages and working hours in accordance with laws and regulations
- Health, safety, and occupational protection
- Right to privacy
- Taking action to remedy potential human rights impacts

A partner who violates or neglects its obligations under the ethical guidelines is obliged to immediately correct its actions, address the actions of its group company, subcontractor, supplier, or own partner, and report the deficiencies and related corrective actions to Consti.

The responsibility for compliance with the ethical operating principles of suppliers lies with the individuals making procurement decisions and the line management guiding them. The procurement manager reports to Consti's CEO. Monitoring and addressing deviations occur in production, i.e., on construction sites. The group's procurement and legal services participate in handling deviations as needed.

3.2.4 Communication on impacts with value chain employees and processes for addressing negative impacts and channels for value chain workers to raise concerns (S2-2, S2-3)

Daily dialogue is conducted with value chain employees on construction sites. Regular meetings are held at the beginning, during, and at the end of the project.

Employees working on construction sites and other partners are encouraged to address any issues they observe immediately. Value chain employees can report observed safety or environmental deficiencies directly to Consti's system or to the immediate supervisor or the site's

safety manager. Reports of inappropriate behaviour, corruption, or other concerns can be made to the supervisor, the supervisor's supervisor, or a representative of Consti's HR function, or anonymously through the electronic reporting channel (whistleblowing channel) starting from December 2024.

More details about the ethical reporting channel, raising concerns, and handling reports can be found in chapter G 4 *Governance of sustainability*.

Any violations related to working conditions, health, and safety on Consti's construction sites are addressed immediately on-site. Human rights violations are handled according to the general risk management process. The starting point is that suppliers are given the opportunity to correct their actions. The most serious cases are brought to the attention of Consti's top management and reported to the Board. If the service provider is unwilling or unable to correct its actions, cooperation with the provider will not continue.

3.2.5 Actions (S2-4)

Working conditions, health, and safety

In construction projects, the responsibility of the subcontracting chain is proactively ensured by checking the background of companies and the status of fulfilling social obligations at the tender stage with a report obtained from the Vastuu Group. The report shows, among other things, the status of tax and pension insurance payments and the applicable collective agreements. If necessary, the inclusion of the partner in the sanctions list is checked. These are key means to prevent negative impacts on value chain employees.

The principles and practices related to safety are the same for both own and subcontractors' employees. Service providers must assess the risks of their own work, prepare for them with a safety plan, and submit the plan to Consti's representative.

Before working on Consti's construction site, subcontractors' employees receive general (ePerchdytys) and site-specific safety training, which has site-specific language versions. All those working on construction sites participate in these. The site-specific training covers key site-specific safety issues and instructs on making safety observations. In addition, Consti has internal online training for, among other things, solo work orientation.

Consti's safety principles, environmental principles, and ethical guidelines for partners can be found on Consti's external website in Finnish and English.

In construction projects, the safety performance of different service providers is monitored, and observed safety deviations are actively addressed. To improve safety, suppliers of goods and services are required to engage in proactive safety work, such as making safety observations. Subcontractors' employees make safety observations in the same way as Consti's own workforce. A notification is sent to the site for the observation made, after which corrective actions are planned for the observation. Accidents and reported safety observations are monitored monthly, and work accidents occurring in Consti's operations are registered in Consti's systems.

Accidents and hazardous situations are thoroughly investigated in cooperation with service providers. Authorities are also involved in investigating serious accidents. The investigation creates conditions to avoid similar cases and identifies possible deficiencies in safety management.

In 2024, there were no cases related to working conditions, health, or safety of value chain employees that were brought to the attention of top management or reported to the Board. The observed situations typically involved negligence in occupational safety or deficiencies in client responsibility information. These were handled by the line organisation and support functions. Suppliers or subcontractors were notified of the negligence or deficiencies and required to correct the observed negligence or deficiencies.

More details about supplier management practices can be found in chapter G1 *Business Conduct*.

4 G-GOVERNANCE OF SUSTAINABILITY

4.1 G1 Business conduct

4.1.1 Corporate culture and goals (G1-1)

The main sustainability goals related to conducting business and corporate culture at Consti are to prevent corruption, bribery, and other misconduct, and to ensure sustainable operations throughout the value chain. Consti aims to ensure that its partners operate responsibly and to minimise risks related to the environment, health, corruption, child labour, and human rights violations in the supply chain.

In addition, Consti strives to ensure that Consti's personnel and everyone working at Consti's worksites have a safe working environment that supports well-being at work and where everyone is treated equally.

The corporate culture is guided by the "Consti Way – Our Way of Working," which is based on five elements: collaboration and openness, common operating models, performance management, understanding the customer, and continuous improvement. The Consti Way practices are highlighted in, for example, orientation, supervisor training, and staff events. The achievement of corporate culture goals and employee concerns are monitored through, for instance, regular employee surveys.

The table below describes the key sustainability goals related to conducting business. Goals related to occupational safety are described in section S1. The goals are set for strategic periods and interim goals for 12-month reporting periods.

Key sustainability factors	Consti's sustainability targets for the strategy period 2024–2027	Goals for 2024	Indicator
Business conduct: Management of relationships with suppliers	Developing partner cooperation to improve sustainability, quality, service and efficiency	Development plan for supplier ESG sustainability assessment methods	Realised/Not Realised
		Identification of the main actors in the value chain	Realised/Not Realised
		100% of subcontractors committed to Consti's Code of Conduct	Share of suppliers committed to the Code of Conduct, %
		No incidents that violate the Code of Conduct	Incidents contrary to ethical guidelines, pcs
Business conduct: Confirmed incidents of corruption or bribery	Reduce the shadow economy in the construction sector together with other operators in the sector	Confirmed cases of corruption or bribery 0 pcs	Cases of corruption or bribery, pcs
Business conduct: Prevention and detection of corruption and bribery	Reduce shadow economy risks in own operations	Development plan for supplier ESG sustainability assessment methodology	Realised/Not Realised
Business conduct: Establishing a sustainable corporate culture and business conduct policies	Increasing taxonomy expertise in business to benefit customers	Increase in the number of taxonomy-compliant projects	Realised/Not Realised

4.1.2 Material impacts, risks, and opportunities (IRO-1)

The material impacts, risks, and opportunities related to corporate governance and corporate culture have been identified in the double materiality analysis described in section 1.4.1. The most significant impacts, risks, and opportunities are related to preventing corruption and bribery, protecting whistleblowers, and occupational safety. Corruption and bribery situations are particularly harmful to business operations. According to Consti's assessment, the risk of corruption in its operations is elevated in site procurement compared to other activities. An effective and efficient process has a preventive effect on corruption, bribery, and other misconduct, which in turn improves business efficiency and manageability and strengthens trust in customer and partnership relationships.

In identifying, analysing, and managing the impacts, risks, and opportunities related to corporate governance and corporate culture, it is essential to engage both employees and partners in the company's ethical guidelines and safety principles, as well as to have effective processes for reporting and handling suspected misconduct.

Material impacts, risks and opportunities related to business conduct

Sustainability area		Material impacts, risks and opportunities	Management	Stakeholder insight
Corporate culture and business conduct: Consti's impact				
G1-1 Corporate culture and business conduct policies	▲	Opportunity: A corporate culture that supports sustainability forms the foundation for sustainable business operations and their development. Shared operational principles enhance job satisfaction and commitment to tasks, while also correlating with positive developments in areas such as occupational safety, employee well-being, and work quality. Consti's procurement sustainability obligations also support the sustainability expertise of the subcontracting chain and enable cost savings. A sustainably operating value chain provides a competitive advantage to all its participants, particularly among clients who value sustainability.	Consti's business and governance responsibility is guided by the Finnish Companies Act, securities market laws, the subcontractor liability law, and other legislation applicable to Consti, the Articles of Association of Consti Plc, the values and ethical principles approved by the company's Board, as well as the rules and guidelines of Nasdaq Helsinki Oy for listed companies. Key elements of corporate governance and corporate culture include employee training, employee surveys, and guiding and engaging business partners in the company's ethical guidelines and safety principles. Effective processes for reporting suspicions of misconduct and handling such concerns.	According to Consti's stakeholders, Consti's ability to positively influence responsible principles regarding its corporate culture and business operations is significant.
	▼	Risk: A corporate culture and operational principles that do not support sustainability hinder the development of sustainable business operations, reduce job satisfaction and commitment, and weaken occupational safety, employee well-being, and work quality. These negative impacts also lead to additional costs and reputational risks, which could result in Consti or its partners being excluded from bidding competitions.		
G1-2 Management of relationships with suppliers	▲	Opportunity: Good relationships with service and goods suppliers form the foundation for sustainable business operations. Strong supplier relationships enhance predictability in procurement success and correlate with positive developments in occupational safety, employee well-being, and work quality. A sustainably operating supply chain is a competitive advantage for all its participants.	All of Consti's office staff and management undergo training on key business principles as part of their orientation training. The training includes, among other things, competition law guidelines, data protection guidelines, and uniform anti-corruption and anti-bribery measures followed by Consti. Depending on the job, further in-depth training is required on other operational principles, such as competition, procurement, contract, and labour legislation.	
	▼	Risk: Relationships with suppliers are a critical part of the construction business and play a key role in the value chain. Poor supplier relationships hinder or even prevent the practice and development of sustainable business operations. A poorly functioning supply chain can pose a risk to procurement success and additionally weaken occupational safety, employee well-being, and, consequently, work quality and productivity. A weak supplier chain can also create reputational risks.		
	▲	Opportunity: Defined and functional processes help detect misconduct and have a preventive effect through their mere existence. This promotes an anti-corruption culture and fair competition throughout the construction industry. The positive reputation of the value chain is strengthening.		
G1-3 Prevention and detection of corruption and bribery	▼	Risk: Corruption and bribery undermine the conditions for practicing and managing responsible business operations. Failure to prevent and detect corruption and bribery results in financial losses. Additionally, there is a risk of reputational damage across the entire value chain.		

Material impacts, risks and opportunities related to business conduct

Sustainability area		Material impacts, risks and opportunities	Management	Stakeholder insight
Corporate culture and business conduct: Consti's impact				
G1-4 Confirmed incidents of corruption or bribery	Upward arrow	Opportunity: The disclosure of corruption and bribery cases is a sign of the effectiveness of anti-corruption and anti-bribery processes, and it also has a preventive impact on such activities. This enhances trust in the compliance of operations and improves business efficiency and manageability. Prompt responses to detected suspicions have a positive impact on customer relationships.	Consti's business and governance responsibility is guided by the Finnish Companies Act, securities market laws, the subcontractor liability law, and other legislation applicable to Consti, the Articles of Association of Consti Plc, the values and ethical principles approved by the company's Board, as well as the rules and guidelines of Nasdaq Helsinki Oy for listed companies. Key elements of corporate governance and corporate culture include employee training, employee surveys, and guiding and engaging business partners in the company's ethical guidelines and safety principles. Effective processes for reporting suspicions of misconduct and handling such concerns.	According to Consti's stakeholders, Consti's ability to positively influence responsible principles regarding its corporate culture and business operations is significant.
	Downward arrow	Risk: If corruption and bribery cases go undetected or are revealed with a delay, it indicates the ineffectiveness of processes. A non-functioning process enables corruption and bribery, undermining trust in operational compliance and increasing risks of sanctions and reputational damage. Corruption and bribery lead to inefficiencies in the procurement process, pose risks of additional costs, quality issues, and sanctions, and can result in the termination of customer relationships and exclusion from bidding competitions.		
Protection of whistleblowers	Upward arrow	Opportunity: The protection of whistleblowers and awareness of such protection encourage reporting of suspected misconduct. It also strengthens a sustainable corporate culture as well as customer and supplier relationships.	All of Consti's office staff and management undergo training on key business principles as part of their orientation training. The training includes, among other things, competition law guidelines, data protection guidelines, and uniform anti-corruption and anti-bribery measures followed by Consti. Depending on the job, further in-depth training is required on other operational principles, such as competition, procurement, contract, and labour legislation.	
	Downward arrow	Risk: If whistleblowers are not protected, it may raise the threshold for reporting suspected misconduct, which in turn may increase misconduct and cause serious harm to customer relationships and fair competition, among other things		
Corporate culture and business conduct: Impact on Consti				
Corporate culture and business conduct. Management of relationships with suppliers. Prevention and detection of corruption and bribery. Confirmed incidents of corruption or bribery. Protection of whistleblowers.	Upward arrow	Opportunity: A corporate culture that supports sustainable development, operational principles, and strong supplier relationships enhance the ability to make sustainable purchases. Sustainable procurement increases productivity, reduces quality risks and associated costs, and enables the sustainability of the entire value chain. The reputation of a sustainably operating value chain is strengthened, which increases Consti's attractiveness as a contractor. Well-functioning processes have an anti-corruption and anti-bribery effect throughout the value chain. The protection of whistleblowers encourages reporting suspicions of misconduct, which helps prevent misconducts.	Compliance with legal requirements and also requiring it from the value chain. Including requirements in contracts, providing instructions on measures and monitoring supply chain operations and, if necessary, addressing shortcomings. The use of standard contract terms and conditions helps to monitor commitment to and compliance with obligations and to intervene in deviations.	According to Consti's stakeholders, Consti has significant opportunities to positively influence its business through the principles guiding its corporate culture and business operations.
	Downward arrow	Risk: If the principles and practical actions supporting sustainability, such as supplier relationships, fail, it will impact the ability to make sustainable purchases and achieve Consti's sustainability goals. A weak supply chain is also a significant reputational risk, which could result in being excluded from bidding competitions. Corruption and bribery lead to inefficiencies in procurement processes, cause quality issues, create sanction and reputational risks, and may result in the termination of customer relationships.		

Consti's values

YOU CAN TRUST US

- We live up to our word – we do what we promise.
- High-quality cooperation is important to us, and our goal is to get things right in one go.
- Caring and commitment are the keys to our success.

RESPONSIBILITY IS ACTION

- We take care of the future together
 - We care about people, the environment and our company.
- Promoting occupational safety and well-being is the foundation of our operations.
- We value diversity.
- We mitigate climate change one property at a time.
- We act ethically, honestly and openly.

FOCUS ON THE CUSTOMER

- For us, partnership means cooperation and respectful encounters.
- We find the best solutions.
- The satisfaction of our customers is a matter of pride for us.
- We work with a genuine service attitude.

PROFESSIONALISM IS AN ATTITUDE

- Our strength lies in the best experts in the field.
- We lead the work with years of experience and each of us is given the opportunity to develop.
- We foster enthusiasm and innovation – taking our expertise and experience to a new level.

4.1.3 Role of governance, management, and supervisory bodies (GOV-1)

Sustainability is part of business management at Consti, overseen by the CEO with the assistance of the Management Team. The Management Team decides on the key sustainability themes and goals for the strategic period, which are approved by the Board. The member of the Management Team responsible for legal and compliance presents compliance and sustainability matters requiring consideration and/or decision to the Management Team and the Board. The role of governance, management, and supervisory bodies in sustainability matters is described in section 1.2.1.

4.1.4 Operating principles (G1-1)

The responsibility of conducting business at Consti is guided by Finnish corporate and securities market laws, the Act on the Contractor's Obligations and Liability, and other legislation applicable to Consti. Consti Plc's articles of association, the company's values and ethical guidelines (Code of Conduct), and the rules and guidelines of Nasdaq Helsinki Oy for listed companies. In insider matters, Consti complies with the EU Market Abuse Regulation and related regulations. Consti adheres to the Finnish Corporate Governance Code for listed companies. Consti complies with the Act on the Contractor's Obligations and Liability and is part of the Reliable Partner programme maintained by Vastuu Group Oy.

The following are the key principles and guidelines approved by the board from a responsibility perspective:

- Ethical guidelines for employees
- Ethical guidelines for partners
- Human rights principles
- Anti-corruption guidelines
- Guidelines for compliance with competition law
- Disclosure policy
- Insider guidelines
- Equality and non-discrimination plan
- Occupational safety principles
- Environmental principles

These are complemented by operating instructions and plans approved by the CEO or the Management Team, such as the environmental programme, guidelines for investigating work accidents, and data protection guidelines.

Consti's ethical guidelines are reviewed during site-specific orientations. Ethical guidelines for partners are part of Consti's general terms and conditions, which suppliers and subcontractors commit to when signing a contract with Consti. The ethical guidelines define not only corruption and bribery but also social relationships in the supply chain, such as human rights and environmental protection. The ethical guidelines on human rights are based on the UN Declaration of Human Rights and the OECD Guidelines for Responsible Business Conduct. The ethical guidelines on environmental protection commit to the efficient use of resources, such as energy and materials, and to reducing the use and amount of substances harmful to the climate.

All Consti office employees and management undergo training on key business principles and practices as part of their orientation. The orientation provides an overview of the business principles followed at Consti (ethical guidelines). In addition, office employees and management complete online training, where business principles are reviewed and described in more detail. The training covers competition law guidelines, guidelines for handling personal data, and the unified anti-corruption and anti-bribery measures and procedures followed at Consti. The Business Fundamentals course must be renewed every two years after orientation. The renewals of the training will begin in 2025. Depending on the job role, other operating principles such as competition, procurement, contract, and labour law training are also required.

To ensure the responsibility of subcontractors, Consti uses the services of Vastuu Group Oy and requires the Valtti card from employees. All operating principles and guidelines approved by the Board are available to all Consti's own employees on the intranet. Occupational safety principles and ethical guidelines for partners are also available on external website in Finnish and English.

The implementation of operating principles is the responsibility of the Business Area Directors and Support Function Directors, in addition to the CEO.

4.1.5 Mechanisms for identifying, reporting, and investigating concerns

Concerns related to conducting business are primarily addressed through orientation, training, and daily supervisory work. In corporate-level orientations and training, ethical guidelines and other key operating principles are reviewed, as well as key practices for identifying, reporting, and investigating potential concerns. Guidelines on matters such as equality, human rights, inappropriate behaviour, occupational safety, and reporting issues related to misconduct are available on the company's intranet for employees with a contract of employment and independent contractors considered part of Consti's own workforce. Additionally, the occupational safety representative, Occupational Safety Manager, and shop stewards provide guidance to employees on emerging issues. Supervisors have been provided with guidelines for handling and investigating suspicions.

In site-specific orientations, key site-specific safety issues are reviewed, and guidance is provided on making safety observations and reporting suspected misconduct. Site orientation applies to everyone working on the sites. Subcontractor personnel working on the sites can seek advice on issues from their immediate supervisor and the site-specific occupational safety manager. Everyone working on the sites can report safety observations through Consti's electronic system.

Consti encourages its employees and partners to immediately address any issues related to responsible operations. Reports of inappropriate treatment, corruption, or other concerns can be made to a supervisor, their supervisor, HR, or anonymously through the electronic reporting channel (whistleblowing channel). The reporting channel was previously only available to Consti's own workforce. Since December 2024, the electronic reporting channel has also been available to value chain employees and everyone working with Consti. The technical implementation of the channel is managed by an external service provider.

All reported violations and suspicions are investigated. Reports made through the channel are directed to Consti's HR, finance, and legal and compliance managers, who conduct the necessary investigations and actions. Investigation materials are stored in file folders accessible only to the aforementioned individuals. The director responsible for legal and compliance oversees the investigations. The involved party or their supervisor does not participate in the investigation of violations or suspicions. Illegal activities are reported to the authorities. Serious violations are handled by the Management Team and reported to the Board. Reporting and handling reports are part of responsible business operations, and Consti does not tolerate any retaliation against whistleblowers. Retaliation refers to actions prohibited by the Whistleblower Protection Act.

Measures related to corruption, bribery, and other suspected misconduct are assessed at Consti according to established definitions and general construction practices. The assessment is based on Consti's own methods and processes, which are based on proactive guidance and ensuring proper procedures. In the guidance and monitoring of operations, attention is paid to compliance with laws and regulations and ethical standards, which are assessed using objective criteria. The significance and severity of suspected misconduct are assessed based on whether the actions objectively meet the requirements of laws and ethical guidelines.

In 2024, Consti did not become aware of any confirmed cases of bribery or corruption. There were also no known violations of competition law or breaches of customer data protection.

4.1.6 Relationships with goods and service suppliers (G1-2)

Supplier management practices

Consti's operating model includes open and honest competition for all business or individual project procurements, deliveries, work performances, and services. Additionally, the company has internal guidelines on competition law provisions and their application. This aims to prevent favouritism of related parties or their close suppliers and ensure the legality of procurement actions. Written contracts are always made for procurements. Consti aims to collaborate long-term with partners committed to good and high-quality work.

Consti's ethical guidelines for partners are part of Consti's general terms and conditions, which all service providers sign.

Consti's annual contracts are made at the corporate level. In project-specific material and subcontracting procurements, corporate-level guidelines are followed. Supply chain risks are mainly managed through documents checked at the time of contract. Additionally, sustainability themes are discussed in follow-up meetings with annual contract partners. The goal is to develop a corporate-wide follow-up meeting practice. Project-specific sustainability issues are addressed in project-specific follow-up meetings.

Subcontractors and other service providers

Consti requires its subcontractors to be members of the Reliable Partner service by Vastuu Group Oy or to provide equivalent documents required by the Act on the Contractor's Obligations and Liability, and to commit to Consti's ethical guidelines. The methods of the Act on the Contractor's Obligations and Liability and access control help prevent both the shadow economy and human rights violations by preventing the use of unauthorised workers. The Vastuu Group service enables, for example, daily monitoring of working hours on sites. Subcontractor agreements specify that Consti's subcontractors may only have one level of their own subcontractors.

Consti uses standardised contract terms, which oblige the subcontracting chain to fulfil its social obligations, such as employer contributions, withholding taxes, and payment of wages according to the collective agreement. The Valtti smart card is used for access control on sites. Employee tax numbers are reported to the public construction industry tax number register maintained by the Tax Administration. Consti reports contract information from each site to the Tax Administration as the main contractor and client. No employee without a work permit issued in an EU member state is hired. Employee rights and human rights issues are discussed in more detail in chapters S1 and S2, which deal with the workforce.

Environmental requirements related to the supply chain are included in the subcontracting programme, which is part of the subcontracting agreement. The terms of the subcontracting programme oblige the subcontractor to comply with environmental regulations and site-specific instructions. Consti monitors the performance of subcontractors working on sites in contractor meetings covering the entire site and in direct negotiations with both subcontractors and suppliers. Additionally, compliance with contractor obligations is monitored at the system level. In case of ambiguities, Consti contacts the relevant party and requests the necessary clarifications to address and resolve the ambiguities.

Goods suppliers

Consti's most significant material procurements are mainly made from Finnish wholesalers or major, established material manufacturers. Consti aims to use well-established and long-standing companies in the industry that declare their commitment to sustainable business principles.

4.1.7 Preventing and detecting the shadow economy (G1-3)

Identified forms of the shadow economy in the construction industry include invoice trading, corruption, bribery, and avoidance of public obligations. The uniqueness and temporariness of construction projects, as well as the large sums of money involved, can attract financial misconduct. At the same time, the large number of different phases, contracts, and subcontractors in projects makes monitoring challenging. Preventing and detecting the shadow economy requires effective and clear risk management in both procurement and site operations.

Consti's ethical operating principles include a prohibition on corruption and bribery, as well as guidelines for avoiding conflicts of interest. Consti's ethical guidelines are attached to procurement contracts. Employees and partners are encouraged to immediately address any potential issues.

The most important means of preventing and detecting corruption and bribery are:

- Training on ethical and other principles and operating instructions guiding Consti's operations
- A defined process for reporting and assessing suspected financial misconduct, inappropriate behaviour, or other significant violations
- The possibility to report suspected misconduct anonymously via the whistleblowing channel
- Requiring that suppliers of goods and construction services have membership in the Reliable Partner service or provide equivalent documents required by the Act on the Contractor's Obligations and Liability
- Defined decision-making authorities
- Maintaining a corporate culture that supports the prevention of misconduct

The processes and guidelines for preventing misconduct are available on Consti's intranet, where they can be accessed by Consti's workforce, except for those working through staffing agencies..

Measurement criteria

Corruption and bribery cases are based on reports made through the electronic reporting channel and cases reported by business areas.

Corruption and bribery	2024
Corruption and bribery cases	0
Number of convictions for violations of anti-corruption and bribery laws	0
Size of fines for convictions for violations of anti-corruption and bribery laws	0

4.1.8 Payment practices (G1-6)

Consti's general contract terms include a standard payment term of 30 days net. The length of the payment term is not specified by supplier group. The payment term can be assessed on a case-by-case basis. To the extent that the information could be calculated, the proportion of payments made according to the standard terms out of all payments made in 2024 was 48.8 percent. The average realised payment term in 2024 was 32 days.

Consti has no ongoing legal proceedings related to payment delays.

4.1.9 Political influence and lobbying activities (G1-5)

Consti does not seek to directly influence political parties and did not provide financial support to political parties in 2024. Consti is not registered in the EU or Finnish transparency registers. Influence is exerted through industry associations. The most important memberships in organisations and advocacy groups are:

- The Confederation of Finnish Construction Industries RT ry and its training organisation Rateko and the joint safety group of the Confederation of Finnish Construction Industries RT ry
- HVAC Contractors LVI-TU ry
- Electrical and Telecommunications Contractors Association STUL ry
- Green Building Council Finland
- Helsinki Circular Economy Cluster
- Suomen Rakennusmaausyhdistys Ry

In 2024, no individuals who had worked in a similar position in public administration or regulatory authorities in the previous two years were appointed to the management or governance bodies of Consti Plc or its subsidiaries.

5 APPENDICES

5.1 Indices of Disclosure Requirements Content Index 1

Multidisciplinary standards

Disclosure requirements

ESRS 2	General Information	Chapter in the report	Additional Information
BP-1	General basis for preparation of sustainability report	1.1.1	
BP-2	Disclosures in relation to specific circumstances	1.1.1	
GOV-1	The role of the administrative, management and supervisory bodies	1.2.1	
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	1.2.1	
GOV-3	Integration of sustainability-related performance in incentive schemes	1.2.2	
GOV-4	Statement on due diligence	1.2.4	
GOV-5	Risk management and internal controls over sustainability reporting	1.1.2	
SBM-1	Strategy, business model and value chain	1.2.3	
SBM-2	Interests and views of stakeholders	1.3	
SBM-3	Material impacts, risks and opportunities and their interaction with business model	1.4.3	
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	1.4.1	
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability report	Index 1 and 2	
MDR-P	Policies adopted to manage material sustainability matters	2.2.3, 2.3.3, 3.1.3, 3.2.3, 4.1.4	
MDR-A	Actions and resources in relation to material sustainability matters	2.2.4, 2.3.4, 3.1.5, 3.2.5., 4.1.5, 4.1.6, 4.1.7	
MDR-M	Metrics in relation to material sustainability matters	1.4.4, 2.2.4, 3.1.6, 4.1.7	
MDR-T	Tracking effectiveness of policies and actions through targets	2.2.1, 2.3.1, 3.2.1, 4.1.1	

Environmental standards

Disclosure requirements

ESRS E1	Climate change	Chapter in the report	Additional information
ESRS 2, GOV-3	Integration of sustainability-related performance in incentive schemes	1.2.2	
E1-1	Transition plan for climate change mitigation	2.1.5	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.4.3, 2.2.2	
ESRS, IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities related to climate change	1.4.1, 2.2.2	
E1-2	Policies related to climate change mitigation and adaptation	2.2.4	
E1-3	Actions and resources in relation to climate change policies	2.2.4	
E1-4	Targets related to climate change mitigation and adaptation	2.2.1	
E1-5	Energy consumption and mix	2.2.4	
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	2.2.4	
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	2.2.4	Not Material
E1-8	Internal carbon pricing	2.2.4	Not Material
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	1.4.3	

ESRS E2	Pollution	Chapter in the report	Additional information
ESRS 2, IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	1.4.1, 1.4.2	Not Material

ESRS E3	Water and marine resources	Chapter in the report	Additional information
ESRS 2, IRO-1	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	1.4.1, 1.4.2	Not Material

ESRS E4	Biodiversity and ecosystems	Chapter in the report	Additional information
ESRS 2, IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	1.4.1, 1.4.2	Not Material

ESRS E5	Resource use and circular economy	Chapter in the report	Additional information
ESRS 2, IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities related to resource use and circular economy	1.4.4 2.3.2	
E5-1	Policies related to resource use and circular economy	2.3.3	
E5-2	Actions and resources related to resource use and circular economy	2.3.4	
E5-3	Targets related to resource use and circular economy	2.3.1	
E5-4	Resource inflows	2.3.4	Not Material
E5-5	Resource outflows	2.3.4	Not Material
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	1.4.3	Reviewed later

Social standards

Disclosure requirements

ESRS S1	Own workforce	Chapter in the report	Additional information
ESRS 2, SBM-2	Interests and views of stakeholders	1.3, 3.1.4	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	3.1.2	
S1-1	Policies related to own workforce	3.1.3	
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	3.1.4	
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	3.1.4	
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	3.1.4	
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.1.1	
S1-6	Characteristics of the undertaking's employees	3.1.6	
S1-7	Characteristics of non-employees in the undertaking's own workforce	3.1.6	Not required in first reporting year
S1-8	Collective bargaining coverage and social dialogue	3.1.6	
S1-9	Diversity metrics	3.1.6	
S1-10	Adequate wages	3.1.6	
S1-11	Social protection	3.1.6	
S1-12	Persons with disabilities	3.1.5	
S1-13	Training and skills development metrics	3.1.6	
S1-14	Health and safety metrics	3.1.6	
S1-15	Work-life balance metrics	3.1.6	
S1-16	Remuneration metrics (pay gap and total remuneration)	3.1.6	
S1-17	Incidents, complaints and severe human rights impacts	3.1.6	

ESRS S2	Workers in the value chain	Chapter in the report	Additional information
ESRS 2, SBM-2	Interests and views of stakeholders	1.3	
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.4.3	
S2-1	Policies related to workers in the value chain	3.2.3	
S2-2	Processes for engaging with workers in the value chain about impacts	3.2.4	
S2-3	Processes to remediate negative impacts and channels for workers in the value chain to raise concerns	3.2.4	
S2-4	Taking action on material impacts on workers in the value chain, and approaches to managing material risks and pursuing material opportunities related to workers in the value chain, and effectiveness of those action	3.2.5	
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.2.1	

Administrative standards

Disclosure requirements

ESRS G1	Conducting business	Chapter in the report	Additional information
ESRS 2, GOV-1	The role of the administrative, management and supervisory bodies	4.1.3	
ESRS 2, IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	1.2.1, 4.1.2	
G1-1	Business conduct policies and corporate culture	4.1.1	
G1-2	Management of relationships with suppliers	4.1.6	
G1-3	Prevention and detection of corruption and bribery	4.1.7	
G1-4	Incidents of corruption or bribery	4.1.7	
G1-5	Political influence and lobbying activities	4.1.9	
G1-6	Payment practices	4.1.8	

5.2 Content index 2: Data points resulting from other EU legislation

Information requirement	Information point	Description	Comments / Additional Information	Paragraph
ESRS 2 GOV-1	21 (d)	Board's gender diversity		1.2.1
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent		1.2.1
ESRS 2 GOV-4	30	Statement on due diligence		1.2.4
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	Not Material	
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	Not Material	
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapon	Not Material	
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco	Not Material	
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050		2.2.5
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks	Not Material	
ESRS E1-4	34	Greenhouse gas emission reduction targets		2.2.5
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)		2.2.4
ESRS E1-5	37	Energy consumption and mix		2.2.4
ESRS E1-5	40 - 43	Energy intensity associated with activities in high climate impact sectors		2.2.4
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions		2.2.4
ESRS E1-6	53 - 55	Gross GHG emissions intensity		2.2.4
ESRS E1-7	56	GHG removals and carbon credits	Not Material	
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks	Not Material	
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk	Not Material	
ESRS E1-9	66 (c)	Location of significant assets at material physical risk	Not Material	
ESRS E1-9	67 (c)	Breakdown of the carrying value of real estate assets by energy-efficiency classes	Not Material	
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities	Not Material	
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	Not Material	
ESRS E3-1	9	Water and marine resources	Not Material	
ESRS E3-1	13	Dedicated policy	Not Material	
ESRS E3-1	14	Sustainable oceans and seas	Not Material	
ESRS E3-4	28(c)	Total water recycled and reused	Not Material	
ESRS E3-4	29	Total water consumption in m3 per net revenue on own operations	Not Material	
ESRS 2- IRO 1 - E4 ESRS 2- IRO 1 - E4	16 (a) i	Biodiversity-sensitive areas impacted	Not Material	
ESRS 2- IRO 1 - E4	16 (b)	Negative impacts with regards to land degradation, desertification or soil sealin	Not Material	
ESRS 2- IRO 1 - E4	16 (c)	Operations that affect threatened species	Not Material	
ESRS E4-2	24 (b)	Sustainable land / agriculture practices or policies	Not Material	
ESRS E4-2	24 (c)	Sustainable oceans / seas practices or policies	Not Material	
ESRS E4-2	24 (d)	Policies to address deforestation	Not Material	
ESRS E5-5	37 (d)	Non-recycled waste	Not Material	
ESRS E5-5	39	Hazardous waste and radioactive waste	Not Material	
ESRS 2- SBM3 - S1	14 (f)	Risk of incidents of forced labour	Not Material	

Information requirement	Information point	Description	Comments / Additional Information	Paragraph
ESRS 2- SBM3 - S1	14 (g)	Risk of incidents of child labour	Not Material	
ESRS S1-1	20	Human rights policy commitments		3.1.3
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8		3.1.3
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	Not Material	
ESRS S1-1	23	Workplace accident prevention policy or management system		3.1.3
ESRS S1-3	32 (c)	Grievance / complaints handling mechanisms		3.1.3, 4.1.5
ESRS S1-14	88 (b) and (c)	Number of fatalities and number and rate of work-related accidents		3.1.6
ESRS S1-14	88 (e)	Number of days lost due to injuries, accidents, fatalities or illnesses		3.1.6
ESRS S1-16	97 (a)	Unadjusted gender pay gap		3.1.6
ESRS S1-16	97 (b)	Excessive CEO pay ratio		3.1.6
ESRS S1-17	103 (a)	Incidents of discrimination		3.1.6
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines		3.1.6
ESRS 2- SBM3 – S2	11 (b)	Significant risk of child labour or forced labour in the value chain		3.2.1
ESRS S2-1	17	Human rights policy commitments		3.2.3
ESRS S2-1	18	Policies related to value chain workers		3.2.3
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines		3.2.5
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8		4.1.6
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	Unknown	
ESRS S3-1	16	Human rights policy commitments	Not Material	
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	Not Material	
ESRS S3-4	36	Human rights issues and incidents	Not Material	
ESRS S4-1	16	Policies related to consumers and end-users	Not Material	
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	Not Material	
ESRS S4-4	35	Human rights issues and incidents	Not Material	
ESRS G1-1	10 (b)	United Nations Convention against Corruption		4.1.4, 4.1.7
ESRS G1-1	10 (d)	Protection of whistleblowers		4.1.5
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws		4.1.7.
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery		4.1.7.

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