



# Sustainability Report 2025

Financial year 1st of January 2024 – 31st of December 2024



# Message from the Chief Sustainability Officer

I am pleased to share our fourth annual Sustainability Report, highlighting our dedication to transparency and accountability in our environmental, social, and governance (ESG) practices.

This year marks a significant milestone as we prepare for the mandatory Corporate Sustainability Reporting Directive (CSRD) reporting. While it is not yet required for RELEX, we have proactively adopted CSRD standards to stay ahead and ensure our reporting aligns with the highest sustainability benchmarks. Although CSRD reporting requires significant effort, we welcome the transparency it brings across companies. This enhanced visibility, fosters accountability, and encourages all organizations to strive for higher standards in sustainability practices. We believe that such transparency is crucial for driving meaningful progress and building trust with our stakeholders.

At RELEX, we value our customers as friends and strive to build strong, supportive, and transparent relationships to help them succeed. As a global employer, we are committed to fostering an inclusive and culturally responsible workplace for all our employees, contractors, and partners. We aim to be exemplary corporate citizens, conducting our business ethically and transparently, and positively impacting our local communities through initiatives like paid volunteering.

We are dedicated to acting in an environmentally responsible manner and for several years we have published our carbon footprint while offsetting our emissions with high-quality carbon credits. In

2024, we took our commitment a step further by committing to set near-term science-based targets. This commitment underscores our resolve to make a tangible impact on reducing our environmental footprint and contributing to a sustainable future.

Our carbon handprint represents the positive environmental impact we have on our customers' operations through our software. We estimate that we helped our customers prevent over 350,000,000 kg of food waste in 2024, which translates to over 1,200,000 tons of CO<sub>2</sub>e. We were also thrilled to launch our CO<sub>2</sub> analytics functionality, a powerful tool that allows our customers to integrate greenhouse gas (GHG) metrics into their planning and optimization processes. This feature not only helps our customers make more informed and sustainable decisions, but also contributes to creating more efficient and resilient supply chains.

As we move forward into 2025, we will continue to focus on measuring, sharing, and reporting our sustainability goals, commitments, and achievements. We invite you to join us on this important journey and stay updated on our latest sustainability initiatives by visiting our website regularly.



**Johanna Småros**  
Co-founder,  
Chief Sustainability Officer

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# General information

## RELEX as a company

RELEX Solutions (RELEX) is a Software as a Service (SaaS) company that develops and provides comprehensive software solutions for supply chain and retail planning and optimization. Our solutions help retailers, wholesale companies, and consumer goods manufacturers align and optimize demand, merchandise, supply chain, and operations planning across the end-to-end value chain.

RELEX Solutions consists of the parent company Retail Logistics Excellence – RELEX Oy, headquartered in Helsinki, Finland and 18 subsidiaries

worldwide. At the end of 2024, the group had offices in Finland, Sweden, Norway, Denmark, Germany, the United Kingdom, France, Italy, Spain, Portugal, the United States, Hong Kong, Singapore, and Australia and customers in over 60 countries. RELEX is a privately held company.

RELEX's total number of employees is 2088 people (headcount). RELEX's headquarters in Helsinki remains the largest office with an employee headcount of 940. RELEX total revenue for the financial year 2024 is 290.5 million euros.



## Basis for preparation of the sustainability report

RELEX's sustainability report has been prepared in accordance with the the European Sustainability Reporting Standards (ESRS) issued by the European Financial Reporting Advisory Group (EFRAG). To meet new reporting requirements in the future, we decided to update the format of RELEX's sustainability report already this year.

### Reporting basis and scope

The information presented in the sustainability report is based on the outcomes of the Double Materiality Assessment (DMA). The data points answered by the report have been assessed as material and are presented in accordance with the topics Environmental (E), Social (S), and Governance (G). For more details on the methodology and scope of RELEX's DMA assessment, please read the DMA section of the report.

The RELEX sustainability report has been prepared on a consolidated basis with the scope of consolidation being the same as RELEX's financial statements. The sustainability report covers RELEX's own operations, upstream, and downstream value chain, including Tier 1 suppliers and partners and RELEX's customers. We followed the reporting requirements and calculation guidance provided unless stated otherwise.

## Disclosures in relation to specific circumstances

### Time horizons

The reporting period for the sustainability information presented in this sustainability report is consistent with that of RELEX's financial statements. Where applicable, the report may establish linkages between retrospective and forward-looking information.

The definitions of short-, medium-, and long-term are aligned with the ESRS 1 requirements. The short-term time horizon is defined as the period adopted as the reporting period. The medium-term is defined as the period from the end of the short-term reporting period and up to five years after the reporting period. The long-term time horizon is defined as being more than five years. No cases of deviation from these definitions in the reporting of sustainability information has occurred.

### Estimations and outcome uncertainty

In the process of assessing risks and opportunities, we acknowledge a certain level of uncertainty when it comes to future events within the long-term time horizon.

We are also working on improving the level of accuracy by achieving a higher percentage of primary data in our carbon footprint calculations. RELEX follows the accounting methodology by the GHG Protocol. Additional information on emission factors and their sources is provided in the section, [Environmental information](#).

For example, we used industry-average emission factors in our carbon footprint calculations when primary data was unavailable. We also estimated electricity source based on the local market average where precise information from the provider was unavailable.

We also observed that the average emission factors are usually higher than then the emission factors provided directly from the supplier. Thus, despite the average emission factors being imprecise, we believe that with these estimations RELEX's emissions are rather overestimated than underestimated.

### Changes in reporting or reporting errors

The report indicates if, when, and what reasons the data has been restated. In this report, we restate RELEX's carbon emissions for the reporting year 2023 presented in the sustainability report 2024.

We are in a process of evaluating any possible alignment with the EU Taxonomy classification of sustainable economic activities. For this reason, the disclosures on the EU Taxonomy have been omitted from this sustainability statement.

## Sustainability governance

### Sustainability Team at RELEX

RELEX has a dedicated team responsible for sustainability management. Within the team, the Chief Sustainability Officer (CSO) is a senior management-level position (that reports to the CEO) at RELEX and a member of the board. The CSO is responsible for the Sustainability Team led by the Head of Sustainability (reports to CSO).

The CSO and the Head of Sustainability review and guide the assessment of material topics for RELEX including impacts, risks, and opportunities. These positions are responsible for reviewing and updating the corporate environmental policies (for example, the RELEX Environmental Policy and the Sustainable Procurement Policy) and monitoring the compliance of the company with the environmental commitments stated in the policies.

The CSO oversees the company's sustainability reporting, which is led by the Head of Sustainability, and monitors the compliance with the external regulations and laws such as, the Corporate Sustainability Reporting Directive (CSRD) in the EU. The CSO is working closely with the Head of Sustainability on setting, reviewing, and monitoring the progress towards corporate environmental targets. The CSO manages sustainability-related company budgets, including the Sustainability Team and carbon offsetting budgets. The CSO and the Head of Sustainability also guide and support product R&D in strengthening the environmental sustainability aspects of the RELEX offering.

The policies, actions, and progress toward targets related to Social and Governance topics are managed by the respective teams at RELEX, including the People and Legal teams.

### Board oversight into sustainability

Through a dedicated position of Chief Sustainability Officer, a member of the board with accountability in sustainability, the board gains oversight over the sustainability impacts, risks, and opportunities, and reviews and monitors sustainability targets, company policies, and engages in other relevant sustainability measures and topics.

Sustainability is a scheduled agenda item in board meetings at least annually or more frequently as important matters arise. The board agenda items include a review and approval of Double Materiality Assessment (DMA) outcomes, and new and/or updated corporate policies.

The board monitors compliance with external regulations and laws and oversees the audits and verification processes, including compliance with the Corporate Sustainability Reporting Directive (CSRD). The CSO is closely involved in the preparations to meet the CSRD requirements and reviews with the board the progress of the related projects and their outcomes.

The board agenda items also include a review of RELEX's own climate impact, including both carbon footprint (our emissions) and handprint (positive impact on the environment through our clients). The board is reviewing and guiding annual sustainability budgets.

The agenda of the board meetings also includes topics related to development and implementation of the business strategy and R&D activities. These discussions tackle topics such as embedding sustainability in RELEX offering and further developing the capabilities of our product to support our clients in their decarbonization journeys.

### Stakeholder engagement

The scope of our stakeholder engagement covers the relationships with the value chain stakeholders and the associated impacts, risks, and opportunities that RELEX has control over. In a long-term perspective, RELEX will be expanding the assessment

boundaries to include the stakeholders of the entire value chain.

#### *RELEX's suppliers and workers in the value chain*

We are collecting data on our suppliers' Environmental, Social, and Governance (ESG) reporting maturity, climate goals, climate roadmaps, and ESG certifications. We have identified key procurement categories in which our procurement choices have the biggest potential to impact the sustainability of our SaaS offering and the environmental footprint of our business. We included sustainability-related questions to our RFPs.

We collect the information from our key suppliers at least annually. The engagement format is a supplier self-assessment (a questionnaire) where RELEX asks suppliers to share their information on their emission reporting, emission reduction targets, and environmental certifications. We also organize regular supplier roundtables.

#### *RELEX's own workforce*

We have multiple channels available for RELEX's employees to give both positive feedback and negative concerns. Those channels include regular employee surveys, annual development discussions, and information-sharing events. We also have available channels for reporting severe human rights impacts and inappropriate conduct. All these channels can be used anonymously. More detailed information is available in the section, [Social information](#).

#### *RELEX's customers*

We engage with our customers on multiple levels, including the assessment of the environmental benefits from using our solutions. We are proud that our food retail and wholesale customers are typically able to cut their food waste by 10–40% through implementation of our platform. We engage with our customers to follow up on their decarbonization journeys and collect information on food waste reductions in our customers' supply chains.

## **Sustainability-related performance and incentive schemes**

In 2024, RELEX has introduced a bonus component for the leadership team on business travel emission reduction justified by the fact that travel emissions are the largest emission category for RELEX. Meeting the target results in a bonus component corresponding to 1% of the base salary.

## **Risk management and internal control processes in relation to sustainability reporting**

Risk assessment in relation to sustainability reporting is embedded in the process of preparing the sustainability information. A risk mapping exercise has helped us to identify the areas in data collection and preparation of the report where the misstatements are likely to occur.

We have adopted the following internal control processes in relation to RELEX's sustainability reporting: We utilize external, independent expertise for conducting the DMA process as well as for performing the GHG accounting procedures; We document the data sources used for collecting qualitative and quantitative data represented in the sustainability report; The outcomes of the DMA process and the sustainability information represented in the report are validated by the board. In the future, our sustainability report will be a subject to mandatory auditing procedure as according to the CSRD requirements.

## Statement on due diligence

Due diligence elements	Section in the sustainability report	Page
Embedding due diligence in governance, strategy, and business model	<a href="#">Sustainability governance</a>	6
	<a href="#">Governance information</a>	43–50
Engaging with affected stakeholders in all key steps of the due diligence	<a href="#">Stakeholder engagement</a>	6–7
	<a href="#">Engaging with RELEX's own workforce</a>	34–35
	<a href="#">Employee representation</a>	49
Identifying and assessing adverse impacts	<a href="#">Double Materiality Assessment (DMA)</a>	9–16
	<a href="#">GHG emission accounting practices at RELEX</a>	28–30, 52
	<a href="#">Engaging with RELEX's own workforce</a>	34–35
	<a href="#">Whistleblowing</a>	45
	<a href="#">Anti-corruption and bribery</a>	44–45
Taking actions to address those adverse impacts	<a href="#">Transition plan</a>	22–23
	<a href="#">Actions and resources in relation to (climate change mitigation and adaptation) policies</a>	24–25
	<a href="#">GHG mitigation projects financed through carbon credits</a>	31
	<a href="#">Water and resource use</a>	32
	<a href="#">Policies and actions related to RELEX's own workforce</a>	36–38
	<a href="#">Workers in RELEX's value chain</a>	42
	<a href="#">Business conduct policies and mechanisms</a>	44–45
	<a href="#">Business conduct in supply chain</a>	49–50
Tracking the effectiveness of these efforts and communicating	<a href="#">Targets related to climate change mitigation and adaptation</a>	26
	<a href="#">GHG intensity</a>	26
	<a href="#">Targets related to own workforce</a>	39
	<a href="#">Incidents of discrimination (including harassment)</a>	35
	<a href="#">Health and safety coverage of own workforce</a>	36
	<a href="#">Family-related leaves</a>	37
	<a href="#">Training and skills development</a>	37
	<a href="#">Remuneration metrics (pay gap)</a>	38
	<a href="#">Employee Net Promoter Score (eNPS)</a>	39
	<a href="#">Corruption and bribery incidents</a>	45



# Double Materiality Assessment (DMA)

## DMA process overview

The sustainability report has been prepared on the basis of the Double Materiality Assessment (DMA) which helped us to identify impacts, risks, and opportunities and assess their materiality for RELEX.

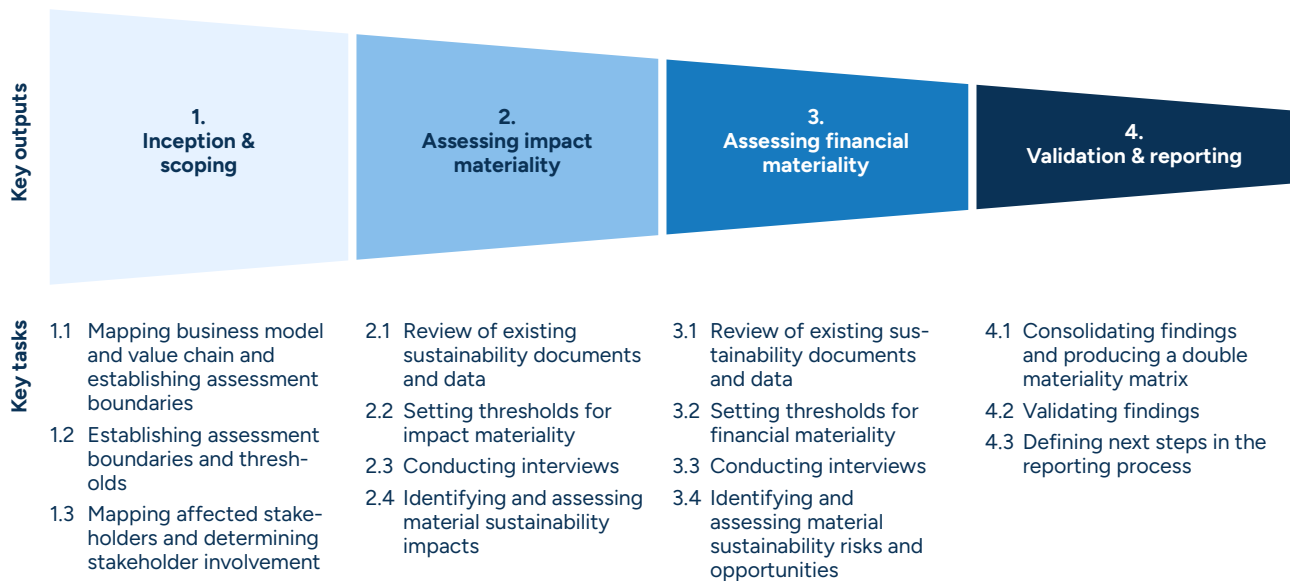
RELEX has established a recurring procedure (materiality assessment) to evaluate its sustainability impacts, risks, and opportunities within the scope of environmental, social, and governance topics. In 2021, RELEX conducted a project with an external consultancy in which we assessed the materiality of the reported topics for the first time and reported them in accordance with the GRI disclosures. In 2022, there were no material changes to our business that would have caused the need to redetermine the material topics.

This sustainability report is based on the new DMA, which was conducted in the spring of 2024 according to the CSRD standards together with an external consultancy. The material topics were defined using the framework given by the CSRD, which includes positive and negative sustainability impacts of our business and financial sustainability risks and opportunities.

## Double Materiality principle



## DMA process funnel



The DMA process consisted of four main stages including 1) inception and scoping, 2) assessing impact materiality, 3) assessing financial materiality, 4) validation and outcome reporting.

In the beginning of the DMA process, we mapped RELEX's value chain and established the assessment boundaries. This exercise also included mapping affected stakeholders and determining stakeholder involvement for the DMA. After the scoping phase, RELEX continued with assessing the impact and financial materiality. At this stage of the process, a review of RELEX's existing sustainability documents

and data took place. The process also included consultations (interviews) with key stakeholders at RELEX and stakeholders representing the supplier, customer, and investor perspectives in the value chain.

We held multiple workshops with key stakeholders to set thresholds for impact and financial materiality. During the workshops, we defined and evaluated positive and negative material sustainability impacts of RELEX's business activities and their financial sustainability risks and opportunities based on the agreed thresholds.

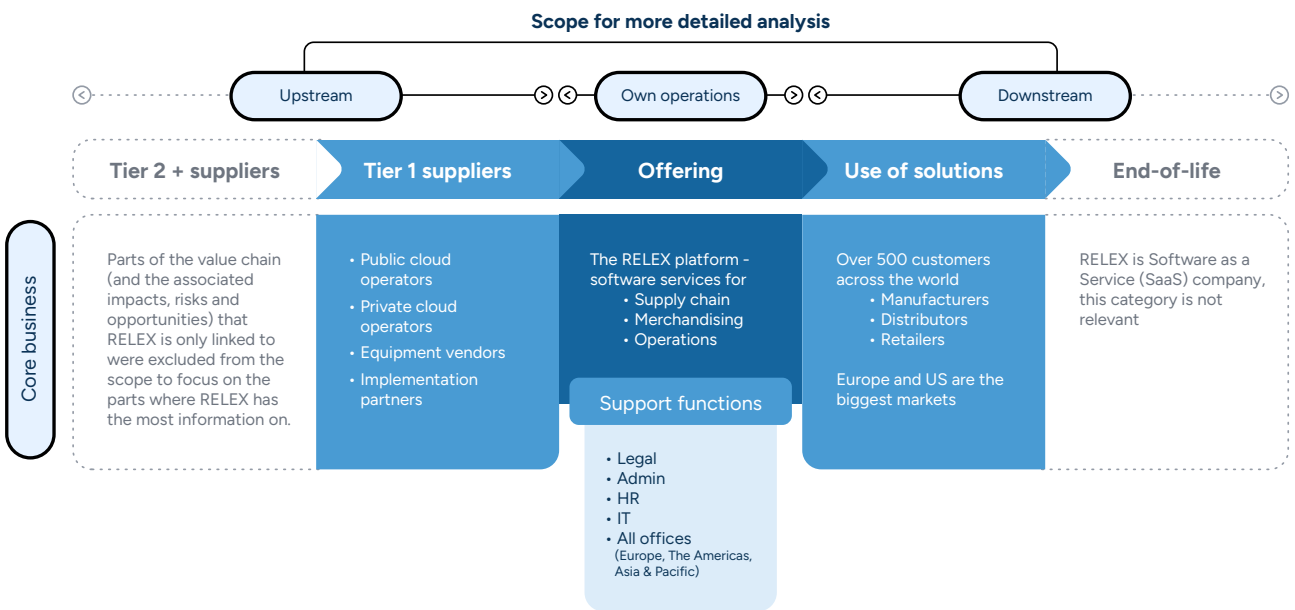
# Methodology

## Scoping

The scope of the DMA process covers the impacts, risks, and opportunities that RELEX has control over. Thus, the scope includes the situations where our company's actions are the direct source of an impact (mainly in our own operations) and where our actions help to cause an impact (for ex., impacts

from RELEX's purchasing practices). The scope of the assessment excluded the value chain links where RELEX is associated with an impact through its business relationships but has not caused or contributed to it. The outcomes of the scoping are presented through the overview on RELEX's value chain.

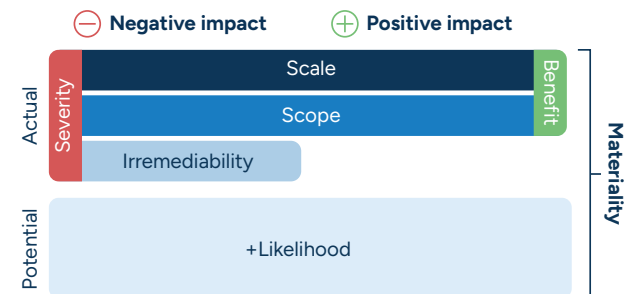
## Value chain scoping



## Impact and financial materiality

We evaluated the actual and potential impact materiality including positive and negative impacts. Actual positive impacts were assessed based on two dimensions: scale (how beneficial the impact is) and scope (how widespread the impact is). Actual negative impacts were assessed based on three dimensions: scale (how grave the impact is), scope (how widespread the impact is), and irremediability (to what extent the impact can be remediated). Potential positive and negative impacts were assessed based on likelihood in addition to the dimensions explained above.

## Impact Materiality



We assessed the financial materiality by evaluating risks and opportunities based on two dimensions: size of financial effects (monetary estimate of the size of the risk or opportunity) and likelihood (the extent to which the financial effect is expected to materialize).

## Financial Materiality



## Thresholds for impact and financial materiality

Prior to conducting the assessment by the dimensions (as explained above), we agreed on the scoring scale for impact materiality (1 to 5) and financial materiality (0 to 4) separately. The scale helped us to agree on the thresholds that we used to conclude which topics are material for RELEX.

The following threshold has been adopted for impact materiality. If either scale, scope, or irremediability are 4 or 5, the impact will be considered severe and thus material, irrespective of the other factor scores. If the sum of scale, scope, and irremediability is at least 9 and the likelihood is an actual impact or common occurrence (5), impact is considered material. For financial materiality, we adopted the following threshold: If multiplication of likelihood and potential size of financial risk or opportunity is at least 8, it is considered material.

## Integration with the general risk assessment

As a SaaS company, climate change mitigation and energy are the priority topics across the value chain and seen as highly important. The likelihood and impact of environmental risks are seen as very low. Instead, we see opportunities to innovate and lead in climate change mitigation technologies through adding sustainability aspects into our existing SaaS services. RELEX operates in an industry in which technological development is fast, and the company's success is dependent on its product development and meeting current and future demands. The opportunity to increase supply chain resilience to the impacts of climate change is embedded in our software solutions and will not require developing a separate product(s). We enable our clients to respond quickly to supply chain disruptions, adopt more effective processes in supply chain and retail planning, and facilitate better decision making.

The impacts associated with RELEX's own workforce and ethical business conduct are judged to be important and are part of the company's overall strategic oversight. The risk of losing RELEX's professional staff and possible delays in the recruitment of new personnel can undermine RELEX Solutions' profitability.

RELEX direct operations and value chain activities do not interface with nature in sensitive locations or locations with substantive nature-related dependencies, impacts, risks, and opportunities. For this reason, climate acute and chronic risks are not material to RELEX.

# Outcomes of the DMA process

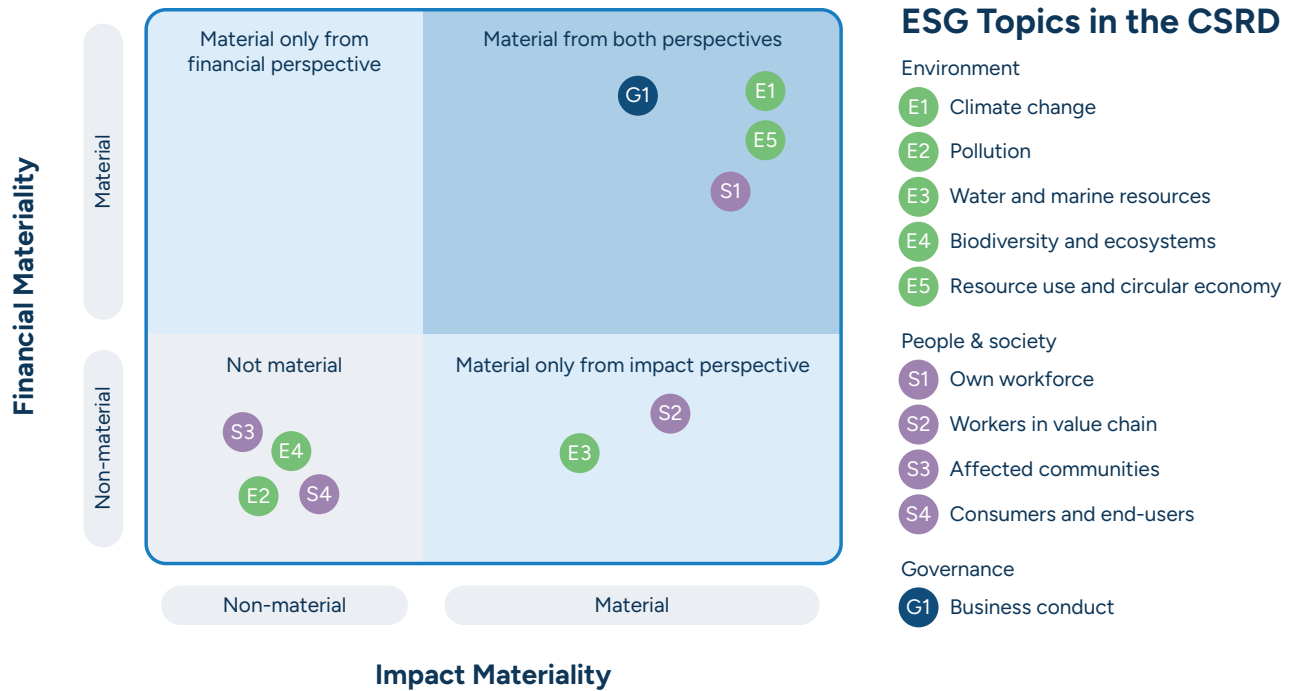
As a result of the DMA process, we have identified RELEX’s societal, environmental, and governance impacts and sustainability-related risks and opportunities.

The results of the assessment were consolidated and graphically presented as a double materiality matrix. The outcomes of the DMA process were validated through joint workshops.

As an outcome of the assessment, we concluded that the several topics are material for RELEX from both perspectives, impact and financial materiality:

Business conduct (G1), own workforce (S1), climate change (E1), resource use and circular economy (E5). Two topics are material for RELEX only from an impact perspective: Workers in the value chain (S2) and water and marine resources (E3).

The tables presented in this section specify the material impacts, risks, and opportunities per each topic (social, environmental, and governance).



The positions of topics on this matrix are indicative and qualitative rather than precise quantitative data.

## Environmental material topics

RELEX's positive environmental impacts are closely linked with our business. RELEX's services can help customers to reduce their greenhouse gas emissions and reduce food waste. We also identified a positive impact and an opportunity to help our

customers manage their supply chains in the event of disruption due to climate change. Negative environmental impacts are primarily associated with RELEX's own greenhouse gas emissions and those in RELEX's value chain.

Topic	Sub-topic	Impact or financial effect	Horizon	Type	Origin
E1 Climate change	E1.1 Climate change adaptation	RELEX's services can help customers manage their supply chains better in cases of disruption due to climate change.	Long	Positive impact	Customers
		Opportunity to provide climate adaptation services to customers to manage disruption due to climate change.	Medium	Opportunity	Customers
	E1.2 Climate change mitigation	RELEX's services can help customers reduce their greenhouse gas emissions.	Short	Positive impact	Customers
		Although actions can be taken to mitigate RELEX's greenhouse gas emissions, existing emissions have a negative impact on climate change.	Medium	Negative impact	Own company
		Although actions can be taken to mitigate value chain emissions, RELEX has a negative impact on climate change through its suppliers' and customer's greenhouse gas emissions.	Medium	Negative impact	Supply chain
		Opportunity to innovate and lead in climate mitigation technologies through adding sustainability aspects into existing SaaS services.	Medium	Opportunity	Customers
		Opportunity to help more customers reduce their greenhouse gas emissions by expanding into new customer verticals or geographies.	Short	Opportunity	Customers
	E1.3 Energy	Although actions can be taken to mitigate energy use, RELEX's services use significant amounts of energy due to high computational intensity.	Medium	Negative impact	Own company
	E3 Water and marine resources	E3.1 Water	Although actions can be taken to mitigate water consumption, RELEX's services use significant amounts of water in data centres and through public cloud due to high computational intensity of core services.	Medium	Negative impact
E5 Resource use and circular economy	E5.3 Waste	RELEX's services can help customers significantly reduce waste such as food waste.	Short	Positive impact	Customers
		Although RELEX utilizes leasing services for its IT equipment needs, it contributes to creating e-waste in the form of used hardware such as computers and phones.	Medium	Negative impact	Own company
		Opportunity to help customers reduce waste (especially food waste) through SaaS services.	Short	Opportunity	Customers

## Social material topics

Material social impacts include those that are linked to RELEX's own workforce and workers in the value chain. As RELEX is a Software as a Service (SaaS) company, the stakeholders across RELEX's value

chain and RELEX's own key stakeholders expect a high focus on societal impact. RELEX's own workforce is seen as one of the main areas of both impact and opportunity for the company.

Topic	Sub-topic	Impact or financial effect	Horizon	Type	Origin
S1 Own workforce	S1.1 Working conditions	Offering flexible and remote working can provide positive impact to staff.	Short	Positive	Own company
		Demanding expert work can have a negative impact on employees' work-life balance.		Negative	
		Computer-based working conditions might have negative impacts on staff's health.		Negative	
		Opportunity to attract and retain top talent by offering flexible and remote working.		Opportunity	
	S1.2 Equal treatment and opportunities for all	Promoting gender equality and equal pay for work of equal value can have a positive impact on society and enhance RELEX's reputation and attract top talent.		Positive	
		Offering training and skills development can bolster innovation and service quality.		Positive	
	S1.3 Other work-related rights	RELEX's diversity strengthens its team's creativity and problem-solving capabilities as well as offers staff from different nationalities a way of effectively integrating into countries such as Finland.		Positive	
Protecting the privacy of staff can have a positive impact on employee trust.		Positive			
S2 Workers in the value chain	S2.1 Working conditions	Promoting fair working conditions in working time, adequate wages, social dialogue, work life balance, and health and safety can cultivate positive and engaged relationships with the upstream suppliers.	Medium	Positive	Supply chain
	S2.2 Equal treatment and opportunities for all	Promoting diversity, gender equality, and equal pay for work of equal value in the upstream value chain promotes diversity and equality in society.		Positive	

## Material governance topics

The likelihood of governance risks is seen as very low but appreciated as a good practice to transparently report on. Material governance topics include positive impacts, such as protection of whistleblowers, fair supplier relationships, and opportunity for a

high level of employee engagement due to positive corporate culture. Governance risks are primarily associated with unethical behaviour, including corruption and bribery, leading to reputational damage, fines, and legal fees.

Topic	Sub-topic	Impact or financial effect	Horizon	Type	Origin
G1 Business conduct	G1.1 Corporate culture	RELEX can have a positive impact on staff engagement via its corporate culture.	Short	Positive impact	Own company
		Opportunity for high levels of employee engagement and retention through good corporate culture.		Opportunity	
		Risk of potential unethical behaviour out of line with the code of conduct, leading to reputational damage, fines, and legal fees.	Long	Risk	
	G1.2 Protection of whistleblowers	Protection of whistleblowers at RELEX can ensure ethical behaviour and regulatory compliance.	Short	Positive impact	
	G1.5 Management of relationships with suppliers including payment practices	RELEX's fair supplier relationships promote sustainability and operational efficiency.		Positive impact	
	G1.6 Corruption and bribery	RELEX's anti-corruption initiatives can ensure ethical behaviour and regulatory compliance within RELEX and the value chain, preserving high stakeholder trust and confidence.		Positive impact	
		Risk of potential corruption and bribery leading to reputational damage, fines, and legal fees.		Risk	



# How to read the sustainability report

The remainder of the report introduces the disclosures by each major topic: environmental, social, and governance information. The following tables offer guidance on how this report references the disclosure requirements in ESRS 2 and the topical standards that are material to RELEX.

## Cross-cutting standards

ESRS	Disclosure	Description	Page(s)
ESRS 2	PB-1	<a href="#">General basis for preparation of the sustainability statement</a>	5
	PB-2	<a href="#">Disclosures in relation to specific circumstances</a>	5–6
	GOV-2	<a href="#">Information provided to and sustainability matters addresses by the undertaking’s administrative, management and supervisory bodies</a>	6
	GOV-3	<a href="#">Integration of sustainability-related performance in incentive schemes</a>	7
	GOV-4	<a href="#">Statement on due diligence</a>	8
	GOV-5	<a href="#">Risk management and internal controls over sustainability reporting</a>	7
	SBM-1	<a href="#">Strategy, business model and value chain</a>	4, 11, 25
	SBM-2	<a href="#">Interest and views of stakeholders</a>	6–7, 34–35, 49
	SBM-3	<a href="#">Material impacts, risks, and opportunities, and their interaction with RELEX’s strategy and business model</a>	13–16
	IRO-1	<a href="#">Description of the processes to identify and assess material impacts, risks, and opportunities</a>	9–12
	IRO-2	<a href="#">Disclosure requirements in ESRS covered by the RELES’s sustainability statement</a>	17–20

## Environmental standards

ESRS	Disclosure	Description	Page(s)
ESRS 2	SBM-3: E1	<a href="#">Material environmental impacts, risks, and opportunities, and their interaction with RELEX's strategy and business model</a>	13–14, 22
	IRO-1: E1	<a href="#">Description of the processes to identify and assess material climate-related impacts, risks, and opportunities</a>	9–12, 28
E1	E1-1	<a href="#">Transition plan for climate change mitigation</a>	22
	E1-2	<a href="#">Policies related to climate change mitigation and adaptation</a>	23
	E1-3	<a href="#">Actions and resources in relation to climate change policies</a>	24–25
	E1-4	<a href="#">Targets related to climate change mitigation and adaptation</a>	26
	E1-5	<a href="#">Energy consumption and mix</a>	27
	E1-6	<a href="#">Gross scope 1,2,3 and total GHG emissions</a>	28–30, 52
	E1-7	<a href="#">GHG mitigation projects financed through carbon credits</a>	31
ESRS 2	SBM-3: E3 & E5	<a href="#">Material impacts, risks, and opportunities related to water and marine resources / resource use and circular economy, and their interaction with RELEX's strategy and business model</a>	13–16, 32
	IRO-1: E3 & E5	<a href="#">Description of the processes to identify and assess material impacts, risks, and opportunities related to water and marine resources / resource use and circular economy</a>	9–12
E3	E3-1	<a href="#">Policies related to water and marine resources</a>	32
E5	E5-1	<a href="#">Policies related to resource use and circular economy</a>	23, 32
	E5-2	<a href="#">Actions and resources in relation to resource use and circular economy</a>	32

## Social standards

ESRS	Disclosure	Description	Page(s)
ESRS 2	SBM-3: S1	<a href="#">Material impacts, risks, and opportunities in relation to own workforce, and their interaction with RELEX's strategy and business model</a>	13, 15, 36–39
	IRO-1: S1	<a href="#">Description of the processes to identify and assess material impacts, risks, and opportunities in relation to own workforce</a>	9–12
S1	S1-1	<a href="#">Policies related to own workforce</a>	36–39
	S1-2	<a href="#">Processes for engaging with own workforce and workers' representatives about impacts</a>	34–35, 49
	S1-3	<a href="#">Processes to remediate negative impacts and channels for own workforce to raise concerns</a>	35
	S1-4	<a href="#">Taking action on material impacts in own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions</a>	36–39
	S1-5	<a href="#">Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</a>	39
	S1-6	<a href="#">Characteristics of the undertaking's employees</a>	40–41
	S1-9	<a href="#">Diversity metrics</a>	40–41
	S1-13	<a href="#">Training and skills development metrics</a>	37
	S1-14	<a href="#">Health and safety metrics</a>	36
	S1-15	<a href="#">Work-life balance metrics</a>	37
	S1-16	<a href="#">Remuneration metrics</a>	38
	S1-17	<a href="#">Incidents, complaints and severe human rights impacts</a>	35
ESRS 2	SBM-3: S2	<a href="#">Material impacts, risks, and opportunities in relation to value chain workers, and their interaction with RELEX's strategy and business model</a>	13, 15, 42
	IRO-1: S2	<a href="#">Description of the processes to identify and assess material impacts, risks, and opportunities in relation to value chain workers</a>	13–14, 42
S2	S2-1	<a href="#">Policies related to value chain workers</a>	42
	S2-3	<a href="#">Processes to remediate negative impacts and channels for value chain workers to raise concerns</a>	42
	S2-4	<a href="#">Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions</a>	42

## Governance standards

ESRS	Disclosure	Description	Page(s)
ESRS 2	GOV-1	<a href="#">The role of administrative, supervisory and management bodies</a>	6, 46–49
	IRO-1: G1	<a href="#">Description of the processes to identify and assess material governance impacts, risks, and opportunities</a>	9–12
G1	G1-1	<a href="#">Business conduct policies and corporate culture</a>	44–45
	G1-2	<a href="#">Management of relationships with suppliers</a>	49–50
	G1-3	<a href="#">Prevention and detection of corruption and bribery</a>	44–45
	G1-4	<a href="#">Incidents of corruption or bribery</a>	45
	G1-6	<a href="#">Payment practices</a>	50



# **Environmental information**



# ESRS E1 climate change

## Transition plan for climate change mitigation

As the effects of global warming become more evident every year, we at RELEX recognize our role in mitigating climate change. Our role is twofold: 1) As a company, we need to reduce the environmental impact of our own operations (footprint) and 2) enable our customers to reduce waste in their supply chains by using our SaaS-solutions (handprint).

Even though the positive environmental impact we achieve through our customers is significantly larger (1,200,000 tons of CO<sub>2</sub>e) than the negative impacts of our operations (9,751.7 tons of CO<sub>2</sub>e), we never use this as an excuse to omit our own footprint.

**Carbon handprint**

**1,200,000**

tons of CO<sub>2</sub>e

**Carbon footprint**

**9,751.7**

tons of CO<sub>2</sub>e

Our approach to minimizing RELEX's environmental footprint includes actions that help us accelerate the use of renewable energy, improve our energy efficiency, achieve cloud optimization, and manage the lifecycle of our IT devices with less electronic waste. These actions also involve our value-chain partners. To support our customers and increase

RELEX's handprint, we have enlarged RELEX's offering portfolio with a CO<sub>2</sub> analytics solution that enables our customers to understand, report, and decrease emissions in their supply chains. We constantly seek new solutions and are improving our existing solutions to deliver supply chain optimization and waste reductions by investing 26% of our total revenue into our Research and Development (R&D) activities.

In 2024, RELEX joined the Science-Based Targets initiative (SBTi) and submitted the company's commitment to set near-term science-based targets for emission reduction within two years from our commitment approval (by 2026). We are committed to setting science-based targets in line with the latest climate science and goals of the Paris Agreement – limiting global warming to 1.5°C above pre-industrial levels. RELEX will update its transition plan in accordance with the set targets. Until then, we have set an annual emission intensity reduction target with an ambition to reduce emission intensity by 5% on a yearly basis. In 2024, our emission intensity decreased by 9.9% compared to 2023.

RELEX has ensured a C-level commitment to environmental responsibility. The Chief Sustainability Officer and the Head of Sustainability are responsible for setting and reviewing the environmental objectives and targets and monitoring the implementation of the environmental policy guidelines across the organization. In addition, our sustainability reporting and targets are reviewed and approved by the board of directors. RELEX is not subject to exclusion from the EU Paris-aligned benchmarks.

## Policies in relation to climate change mitigation and adaptation

We are committed to minimizing our negative environmental impacts, both in our internal operations and in our value chain. Our efforts and approach to managing our material impacts, risks and opportunities related to climate change mitigation and adaptation are documented in the RELEX Environmental Policy and Sustainable Procurement Policy. The Environmental Policy documents our company's objectives and targets in minimizing RELEX's carbon footprint and increasing our carbon handprint. The Sustainable Procurement Policy documents RELEX's sustainable procurement practices and goals that reflect our environmental commitments stated in the Environmental Policy.

### RELEX Environmental Policy

The [Environmental Policy](#) scope is our company's internal operations across all functions and our value chain, including suppliers and customers. The most senior level role in the organization that is accountable for the implementation of policy is the Chief Sustainability Officer. Through the implementation of the Environmental Policy the following third-party standards and initiatives are respected: GHG Protocol for greenhouse gas (GHG) emission inventory and reporting, and the 2030 Agenda for Sustainable Development and contribute to the goal #12-3 on reduction of food waste and goal #13 on climate action. As indicated earlier, we have joined SBTi and committed to setting science-based targets within two years of our commitment which will be also then reflected in the Environmental Policy.

The policy has been aligned with the Double Materiality Assessment (DMA) and outcomes of key stakeholder interviews to capture interests of key stakeholders on the environmental topics. The policy is made publicly available to all stakeholders [online](#). We expect all our employees to read and comply with the Environmental Policy as part of the bi-annual company-wide mandatory Business Ethics certification course.

RELEX's Environmental Policy addresses climate change mitigation by outlining the key principles and actions for reduction of the greenhouse gas (GHG) emissions caused by RELEX. The policy also addresses climate change mitigation and adaptation through our commitment to continuously develop our solutions and innovate new ways of decarbonizing the supply chains of our customers, across all industries. Energy efficiency and renewable energy deployment matters are addressed through our policy commitments to increase the use of renewable energy for our software product and engage with our cloud infrastructure providers to adopt more environmentally friendly practices. We also consider energy efficiency in RELEX office buildings demonstrated by certificates (LEED and Breeam).

### RELEX Sustainable Procurement Policy

The Sustainable Procurement Policy scope applies to all RELEX employees and all procurement categories and targeted suppliers globally. The most senior level in the organization that is accountable for the implementation of policy is the Chief Sustainability Officer. Through the implementation of the Policy the following third-party standards and initiatives are respected: GHG Protocol for greenhouse gas (GHG) emission inventory and Fundamental Principles and Rights to Work in respect to workers in our value chain. The policy has been developed in active engagement with RELEX's Procurement Director. Based on the policy, we have given training to RELEX's procurement employees and engaged with our suppliers through a questionnaire. The policy is made available online to all employees internally at RELEX.

RELEX's Sustainable Procurement Policy addresses climate change mitigation, energy efficiency, and renewable energy by outlining our procurement principles for increasing the use of renewable energy for our software product and supporting our cloud infrastructure providers in adoption of renewable energy. The policy states our objective and actions to engage with our potential and existing suppliers on environmental topics and climate goals. The policy also tackles these areas by outlining procurement principles for office spaces and IT equipment categories.

## Actions and resources in relation to policies

### Actions to reduce RELEX's environmental footprint

As a software company, we rely on the use of energy to develop and offer our products and services to our clients. This section introduces the actions we take to minimize our environmental footprint.

#### *Use of renewable energy and optimization of cloud computing*

To minimize the climate impact of our SaaS offering, RELEX acts to increase the use of renewable energy and optimize use of cloud services for our software products. We are also proactively engaging with our cloud infrastructure providers to adopt more environmentally friendly practices. The scope of this action includes both our private (co-location) data centers and public cloud infrastructure providers.

We are committed to using co-location data center service providers that have selected renewable energy. If such suitable vendors cannot be identified in a specific geographical area, we purchase the energy attribute certificates corresponding to our energy consumption. We are also working with the data center service providers to support them in adoption of renewable energy. Through this, we have reached 100% renewable energy use by RELEX Solutions in co-location data centers. Our servers meet EnergyStar / EU 2019/424 requirements.

Our public cloud infrastructure providers are consistently increasing their use of renewable energy, some of them having reached 100% already. RELEX is working on cloud optimization to reduce energy consumption. In our technology function we are increasingly incorporating GreenOps and FinOps practices that enable us to utilize cloud resources in an optimal way. In 2024, our emission intensity in our biggest public cloud provider declined by 20% with the combined effort of cloud optimization actions, and increased use of renewable energy by

the provider. We continuously monitor our performance in respect to renewable energy and cloud optimization.

#### *RELEX offices: Employee commute, energy efficiency, and use of renewable energy*

Our objective is to reduce our emissions from employee commuting and our use of office spaces. The scope of our actions to achieve this objective covers all RELEX offices globally with an emphasis on our largest by employee count office in Helsinki. We choose renewable electricity in all locations where RELEX, as a tenant of the office space, has this opportunity to do so. When renewable energy sources are unavailable, we firstly aim to leverage our landlords into choosing renewable electricity sources and secondly purchase Energy Attribute Certificates (EACs) ourselves. We continuously monitor the energy consumption in our offices including data collection on sources of electricity. Through these actions taken, we have secured 100% renewable electricity in our offices globally, and we are committed to keeping it this way.

Our future action is to relocate our largest by employee count office, the RELEX headquarters in Helsinki, to a more energy efficient and accessible location (by public transport and bicycle) by 2027. The new RELEX Solutions headquarters is our flagship for sustainable office design, and the office building will comply with high energy-efficiency standards (LEED Platinum).

We take actions to foster a responsible business travel culture among RELEX employees globally. We published internal guidelines for business travel that are valid globally. The guidelines concern individual travelers as well as the way we organize our internal events. Internal events such as department kickoffs form a substantial part of our business travel emissions. The guiding principle is that events should be hosted in a destination where most participants are located and if flights are necessary, accessible with direct flight routes.



## **Actions to achieve positive environmental impact (handprint)**

Through RELEX's software solutions, we support our clients in their sustainability journey by helping them reduce waste in their supply chains. This is achieved through more accurate planning of demand, inventory, space, promotions, and production, as well as through information sharing across the supply chain. We acknowledge an opportunity to lead in climate change mitigation technologies through adding sustainability aspects into RELEX's existing software services. By using our solutions, our clients become better equipped to manage supply chain disruptions, adapt to changes due to climate change, and take actions to minimize the footprint of their supply chains for climate change mitigation.

We are very proud of the results we have achieved in reducing food-waste-related emissions. Our solution is already helping hundreds of food retailers and wholesale companies globally to reduce their food waste by up to 40%. Even a 15% reduction across our customer base means preventing over 350,000,000 kilograms of food waste in the reporting year. That translates to a carbon handprint equivalent to 1,200,000 metric tons of CO<sub>2</sub> equivalents in 2024.

We are committed to continuously developing our solutions to innovate new ways of decarbonizing the supply chains of our customers across all industries. In 2024, we have introduced a new CO<sub>2</sub> Analytics functionality that automatically tracks and reports the CO<sub>2</sub> emissions of purchased products and transportation. This new capability helps companies track, reduce, and report their CO<sub>2</sub> emissions, supporting sustainability initiatives and government regulations.

## Targets related to climate change mitigation and adaptation

In 2024, RELEX has evaluated the Science-Based Targets initiative and committed to setting the targets aligned with the goals of the Paris Agreement by the year 2026. This commitment will change our approach to environmental target setting including the changes in methodology and scope of our targets. To set these targets, we need to have the full picture of all emissions that occur in our value chain. We therefore decided to include in the 2024 emission inventory our full spending in our greenhouse gas (GHG) inventory, accounting for every euro spent on purchased goods and services. For comparability reasons, we re-calculated our 2023 numbers to reflect the change in reporting boundaries. We are restating RELEX's emissions for the year 2023 with increased GHG accounting boundaries (including total spending) to be able to use the year 2023 emissions as the baseline for setting

science-based targets. RELEX also completed an acquisition process during 2024, and the emissions and revenue of the acquired company have been included when restating the 2023 emissions and emission intensity. These emissions, both for 2023 and 2024, can be seen on page 29.

Before we set the science-based targets, RELEX has been tracking the effectiveness of our actions through an emission intensity reduction target (metric tons of CO<sub>2</sub>e / M€ revenue). Our target is to reduce the emission intensity by 5% on a yearly basis.

In the reporting year 2024, the emission intensity has gone down by 9.9% compared to the year before (2023). We also see reduced emission intensity in our largest emission category, business travel by 8.0%.

### GHG intensity (base year, reporting year)

Emission intensity (total GHG emissions per net revenue)	2023*	2024
GHG emission intensity, location-based	38.1	34.3
GHG emission intensity, market-based	37.3	33.6
GHG emission intensity, Scope 3	36.8	33.2
Net revenue used to calculate GHG intensity (M Euro)	237.7	290.5
Net revenue (Other, M Euro)	0	0
Total net revenue (M Euro)	237.7	290.5

\*Restated 2023 emissions and revenue (including the acquired company).

## Energy consumption

Our operations require consumption of purchased electricity, heat, and cooling for RELEX offices. RELEX's total energy consumption in absolute value is 1642 MWh with the share of renewable energy 86.2% from the total value. Information on the contractual instruments for securing energy origin from renewable sources is available in the section, [Scope 2 GHG emissions: Contractual instruments](#).

Energy consumption and mix	
Total energy consumption in absolute value (MWh)	1642
Share of renewable energy (%)	86.2%
Total renewable energy consumption (MWh) disaggregated by:	
A) fuel consumption from renewable sources including biomass	0
B) consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	1416
C) consumption of self-generated non-fuel renewable energy	0

100% of RELEX net revenue originate from activities other than in high climate impact sectors.

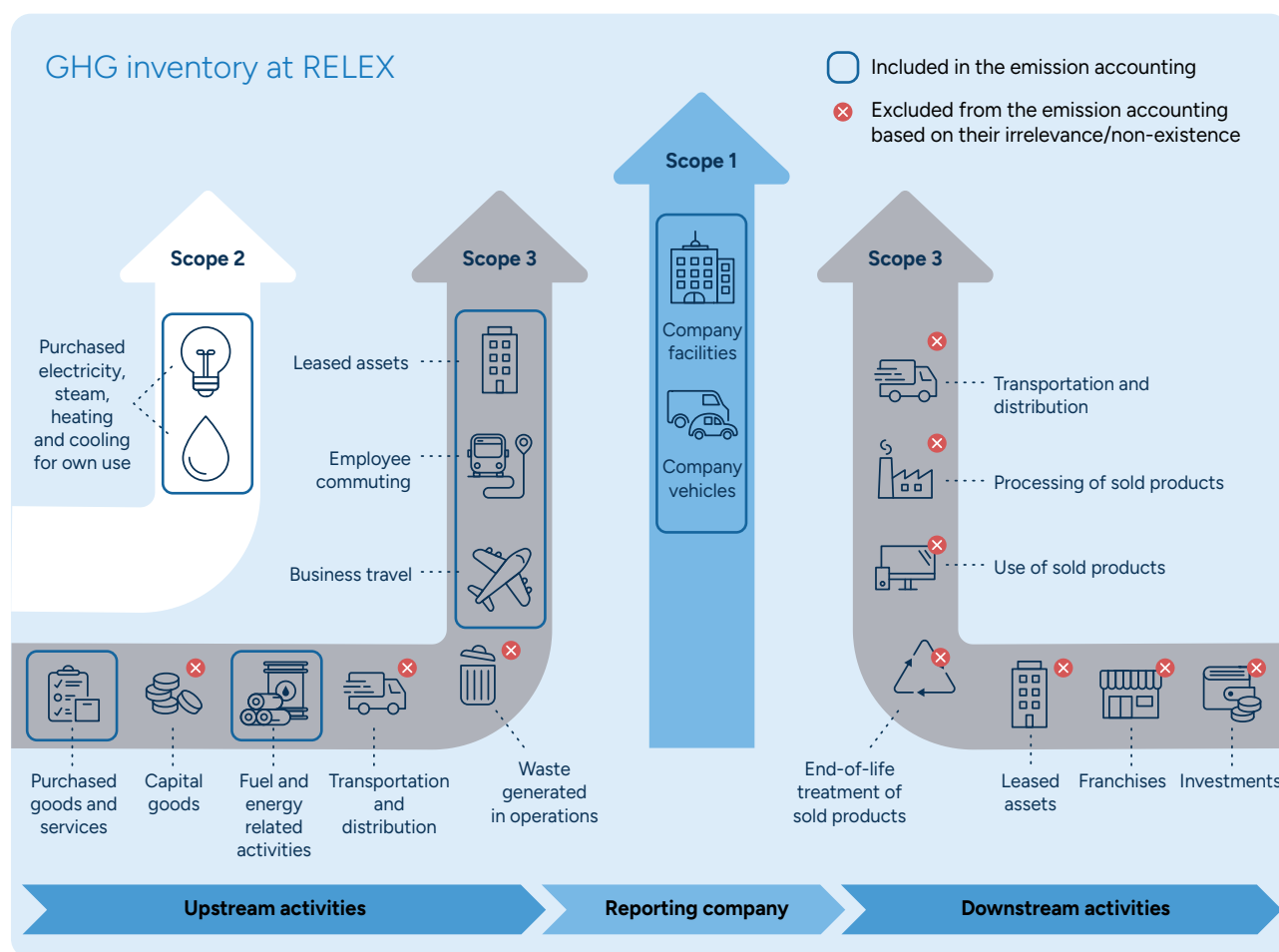
# GHG emission accounting practices and outcomes

## GHG inventory at RELEX

As a SaaS company, we mainly deal with non-physical goods and services. Scope 1 and 2 account for only 1.1% of our emissions, whereas 98.9% of our emissions occur in our value chain in Scope 3. In preparation of the GHG emission report, RELEX considered the guidance by the GHG Protocol

Corporate Accounting, The Corporate Value Chain (Scope 3) Standard, and other relevant supplementing guidelines published by Greenhouse Gas Protocol.

The GHG accounting calculations cover all RELEX offices globally. We have adopted the operational control consolidating approach in RELEX's GHG emissions accounting. The reporting period applied to calculate the GHG emissions is the same as the company's own financial reporting period.



## Overview of RELEX GHG emissions in the reporting year

Total GHG emissions (tCO <sub>2</sub> eq)	2024
Gross Scope 1	87.5
Gross Scope 2	21.3
Gross Scope 3	9,642.8
<b>Total</b>	<b>9,751.7</b>

## GHG emissions in RELEX value chain

GHG emissions in value chain (tCO <sub>2</sub> eq)	
Upstream	9,751.7
Own operations	108.8
Transport	0
Downstream	0

## Detailed overview of RELEX GHG emissions (base year, reporting year)

In 2024, we have expanded the boundaries of RELEX's GHG emission accounting to include total spend. RELEX has also completed an acquisition process during 2024, and the emissions of the acquired company are now part of the consolidated GHG emission reporting. Thus, we are restating

RELEX's emissions for the year 2023, and we are using updated boundaries for the year 2024 emissions report. The restated emissions calculations from the year 2023 will be used as a base year for setting science-based reduction targets.

Total GHG emissions (tCO <sub>2</sub> eq)	Base year (2023, restated)	2024
<b>Gross Scope 1</b>	<b>87.7</b>	<b>87.5</b>
% of Scope 1 GHG emissions from regulated emissions trading schemes	0%	0%
<b>Gross Scope 2</b>	<b>28.9</b>	<b>21.3</b>
Location-based Scope 2	236.0	236.3
Market-based Scope 2	28.9	21.3
<b>Gross Scope 3</b>	<b>8,739.0</b>	<b>9,642.8</b>
1 Purchased goods and services	3,396.7	3,944.5
(Cloud computing and data center services)	(265.1)	(244.8)
2 Capital goods	0.0	0.0
3 Fuel and energy-related activities	280.3	281.7
4 Upstream transportation and distribution	0.0	0.0
5 Waste generated in operations	0.0	0.0
6 Business travelling	4,116.5	4,633.0
7 Employee commuting	548.0	634.1
8 Upstream leased assets	397.6	149.5
9 Downstream transportation	0.0	0.0
10 Processing of sold products	0.0	0.0
11 Use of sold products	0.0	0.0
12 End-of-life treatment of sold products	0.0	0.0
13 Downstream leased assets	0.0	0.0
14 Franchises	0.0	0.0
15 Investments	0.0	0.0
<b>Total GHG emissions</b>	<b>8,855.7</b>	<b>9,751.7</b>
<b>Total GHG emissions (location-based)</b>	<b>9,062.8</b>	<b>9,966.7</b>
<b>Total GHG emissions (market-based)</b>	<b>8,855.7</b>	<b>9,751.7</b>

## Scope 2 GHG emissions: Contractual instruments

As stated in RELEX's Environmental Policy, we are committed to maintaining the use of 100% renewable energy for purchased electricity used in our offices. In some locations we reach this target by purchasing Guarantee of Origin (GO, REGO) and Renewable Energy Certificates (REC, I-REC).

Contractual instruments: Electricity		2024
Types of contractual instruments and share (%) of each type		100% EAC
Share of contractual instruments (bundled)		48%
Share of contractual instruments (unbundled)		52%

## Share of GHG emissions calculated using primary data

Information on emission factors used in calculating the emissions is available in the appendix.

Data quality	
Share of total GHG emission calculated using primary data	20.0%

## GHG mitigation projects financed through carbon credits

RELEX has been voluntarily offsetting all of the company's emissions since the year 2021. In 2024, we purchased and retired credits from an afforestation project, the TIST program in Kenya. It has always been important for us to select high quality offsetting projects. Therefore we have always selected to work with vendors that apply rigorous screening criteria to the projects in their portfolio.

Carbon credits cancelled in the reporting year	
Total amount of carbon credits (tCO <sub>2</sub> eq) outside value chain that are verified against recognized quality standards and cancelled (in the reporting year)	6,000
Share from reduction projects (%)	0%
Share from removal projects (%)	100%
Type of carbon credits from removal projects	ARR - Agroforestry
Share of recognized quality standard(s) (%)	Verra – 100%
Share from projects within European Union (%)	0%
Share of carbon credits that qualifies as corresponding adjustments under Article 6 of the Paris Agreement	0%

Carbon credits to be cancelled in the future	
Total amount of carbon credits outside value chain planned to be cancelled in future (tCO <sub>2</sub> eq)	8033*
Until period (year)	2025

*\*1719 carbon credits for offsetting 2024 emissions were already cancelled in 2024. The remaining ones (9752-1719=8033) will be cancelled in 2025.*

# ESRS E3 water and E5 resource use

## Water consumption

During the DMA process, RELEX has identified that the impacts related to water consumption in data centers occur in our upstream value chain. We are currently assessing the practices on water handling for data center cooling of our private data center providers.

## Resource use

This section of the report elaborates on our actions that target waste in RELEX's own operations and our value chain. As a software company, we take actions to reduce electronic waste and minimize the impact of using various IT devices in our own operations. We also help our customers to optimize their supply chains, and reducing waste is at the core of what we do as a company.

### Electronic device lifecycle management

As a software company, we use various IT equipment to create and deliver our solutions and services. Thus, we are at risk of generating excessive electronic waste. Our [Environmental Policy](#) and [Sustainable Procurement Policy](#) outline our commitments to extend the lifecycle of electronic products we use and ensure their proper end-of-use and end-of-life treatment. RELEX has adopted a leasing scheme for the personal IT equipment (laptops, phones, monitors). We continuously evaluate the most appropriate lease period lengths to find balance between sustainability and equipment performance. As a result of re-evaluation, we have previously (in 2023) updated the mobile phone leasing period from two to three years. Our leasing

partners either reuse (resell) the returned equipment or recycle it in accordance with local regulations. We also manage servers' end-of-life disposal according to the WEEE Directive 2012/19/EU standards.

### Minimizing waste

Reducing waste is at the core of what we do. For nearly two decades, RELEX has helped its hundreds of customers worldwide, including retailers, wholesalers, and manufacturers across different industries reduce waste through optimized supply chain planning. We are especially proud of our proven track record in fighting food waste, as dealing with perishable-item supply chains is notoriously difficult. Preventing food waste through more accurate forecasting and inventory optimization is an integral part of RELEX's [Environmental Policy](#) and addresses our material impacts in the downstream value chain (our customers).

Every year, approximately one-third of the world's food supply goes to waste. Our actions are aligned with UN Sustainable Development Goal (SDG) to halve food waste by 2030. RELEX equips its customers with a unified supply chain and retail planning solution that helps reduce the volume of perishable goods left unsold and destined for waste. Using data-driven solutions for improving sustainability leads to reducing spoilage in short-shelf-life products while reducing stock outs. In this way, RELEX can make an impact on lowering food waste through its food and grocery customers. We are also considering setting carbon handprint (including food waste prevention in the downstream value chain) targets in the future.





# **Social information**



# ESRS S1 RELEX's own workforce

## RELEX's general guiding principles for responsible social conduct

RELEX's general guiding principles for social conduct, including relevant human rights policy commitments, are documented in [RELEX's code of conduct](#). RELEX is supporting internationally recognized human rights standards and labor rights. Severe cases of human rights violation can be reported via RELEX's [Whistleblowing channel](#). By adopting RELEX's Whistleblowing Policy, we ensure that we provide and enable remedy for human rights, corruption, and bribery impacts. RELEX's [Modern Slavery Statement](#) explicitly addresses human trafficking and forced labor including the exploitation of children and youth. We address discrimination through RELEX's [code of conduct](#) and [supplier code of conduct](#) which cover different types and grounds for discrimination in RELEX's own operations and in our supply chain.

RELEX wants to create a diverse workplace where all employees have equal opportunities. We will not discriminate against any employee or job applicant regarding any personal characteristics, such as age, religious beliefs, national origin, race, color, sexual orientation, gender identity, or disability. We support potentially vulnerable groups with the policies and actions explained in the sections of this report, [Health and wellbeing](#) and [Diversity, equality, and inclusion](#). To ensure that discrimination is prevented, mitigated, and acted upon, RELEX has developed a company-wide [Inappropriate Conduct Prevention Model](#). The model is intended to prevent and resolve

intentional and unintentional inappropriate conduct, including cases of harassment or discrimination of any type.

## Engaging with RELEX's own workforce

RELEX's general principles for engaging with its own workforce are documented through RELEX's code of conduct. RELEX promotes employees' rights and freedom to join labor associations and unions. RELEX complies with applicable collective bargaining agreements in the countries where RELEX operates.

The engagement can occur directly with the employees or through employees Representatives. RELEX maintains a low hierarchy environment in which all employees have no boundaries limit who can approach RELEX's leadership with ideas, feedback, and concerns. The following types of regular engagements occur at RELEX:

- Monthly pulse surveys to track the well-being of RELEX's employees.
- Yearly comprehensive employee satisfaction survey to identify challenging areas that RELEX can improve.
- Bi-weekly company-wide online meetings where both senior leadership and other employees share topical news and are encouraged to interact and ask questions.
- Yearly development discussions with all RELEX employees with the recommendation of an additional mid-year check-in discussion between team leads and each of their team members.

RELEX's People team, including Chief People Officer (a member of RELEX's leadership team), has operational responsibility for ensuring that these types of engagements occur, and the leadership team is informed of the results of these engagements. We evaluate the effectiveness of these engagements through the employee satisfaction target (eNPS).

### Processes to remediate negative impacts and channels to raise concerns

RELEX has developed a company-wide Inappropriate Conduct Prevention Model intended to prevent and resolve intentional and unintentional situations of inappropriate conduct, harassment, or discrimination of any type. Immediate and appropriate action is taken in response to allegations of any inappropriate conduct. Actions may include the use of disciplinary action, and action to eliminate inappropriate conduct regardless of whether the conduct violated the law. The overarching goal of the prevention model is to address inappropriate conduct at the earliest possible stage, before it becomes severe or pervasive, e.g., behavior that is widespread, common, or repeated. The model includes a follow-up meeting with the affected employees to ensure that the remediation solution has been effective.

RELEX's own workforce can make any other concerns and report on their needs directly to the leadership team or via any regular engagement mechanisms we offer (see section, [Engaging with RELEX's own workforce](#)). The bi-weekly pulse and yearly employee satisfaction surveys are two primary channels for employees to raise their concerns and give feedback. We support the availability of these channels by allocating internal resources and by utilizing software solutions for surveying and conducting employee development discussions. The issues raised through these channels are reviewed and addressed by RELEX's leadership team. The effectiveness of these measures taken is evaluated through the same mechanisms (monthly feedback surveys and yearly employee satisfaction survey). To

make sure RELEX's employees trust these mechanisms, the survey answers are set to be anonymous.

As disclosed above, RELEX also has a Whistleblowing Policy (see sections [RELEX's general guiding principles for responsible social conduct](#) and [Governance information](#)) which ensures the availability of a Whistleblowing Channel for reporting severe cases of human rights violations. This channel is available online at RELEX's website, and one can choose to report the case anonymously.

### Incidents, complaints, and severe human rights impacts

No severe human rights issues and incidents connected to RELEX's own workforce have occurred. We had no confirmed incidents of discrimination.

Incidents of discrimination (including harassment)	
Total number of incidents of discrimination, including harassment	0
Number of complaints filed through channels for people in the undertaking's own workforce to raise concerns (including grievance mechanisms)	0
Total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints (€)	0
Number of severe human rights issues and incidents connected to own workforce	0
Number of severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	0
The total amount of fines, penalties and compensation for damages for the incidents (€)	0

## Policies and actions related to RELEX's own workforce

Our policies and actions target material topics of employee work-life balance and health (including flexible and remote working), diversity and inclusions, and privacy as identified during the Double Materiality Assessment (DMA) process.

### Health and wellbeing

RELEX is committed to providing a good working environment as well as safe and healthy working conditions for all representatives (employees and employee-like contractors and contractors) working at RELEX. We follow each country's local regulations and requirements concerning health and safety issues. Our employees have access to office-related safety guidance as well as an extensive health care support network. The health and wellbeing guidelines are communicated to all employees via the employee intranet online. Our largest office (by employee count) in Helsinki (Finland) is covered by the Health and Safety Policy developed in line with local legislation.

Health and safety of own workforce	
Percentage of people in its own workforce who are covered by the undertaking's health and safety management system based on legal requirements and/or recognized standards or guidelines	100%

The guidelines on good working environment and safe and healthy working conditions include but not limited to, following:

- Healthy, physically, and ergonomically safe working conditions in all RELEX offices, including remote and shared office locations.
- The work environment is psychologically safe for all employees.
- Everyone is committed to treating others with respect in all situations (in all interaction, during workdays but also in their free time).

- RELEX's strategy and employees' roles, tasks, responsibilities, and ways of working are clear for everyone.
- Healthy work-life balance.

RELEX takes the responsibility to ensure that its employees across all office locations, including remote workers, have the tools and capabilities needed to maintain a good work ability and take care of their wellbeing. All these actions serve as supportive processes to improve employee satisfaction at the workplace and maintain open communication with employees.

### *Flexible and remote working*

We have remote and hybrid work possibilities for all our employees across all our RELEX countries. We provide guidelines and tools for remote working including collaborative tools and ergonomic home office furniture.

### *Professional growth and development*

RELEX also has a process for development discussions, career path models, compensation and benefits, handbook, and salary ranges defined per function.

### *Mental health*

The People team offers support for upkeeping good mental wellbeing and preventing burnout. It includes the Early Support Model to identify and address any wellbeing issues in RELEX employees' work ability as early as possible.

### *Work-life balance*

We promote work-life balance and believe it is important to take time off with family and children. RELEX employees are entitled to a variety of family leaves such as maternity, paternity, parental, and childcare leaves. In most countries, we offer benefits superior to those in the national standards; in the U.S., for example, RELEX provides three months of fully paid parental leave.

Family-related leaves	
Percentage of total employees entitled to take family-related leave*	100%
Percentage of entitled employees that took family-related leave (total)	11.8%
By gender:	
Male	12%
Female	11.6%
Other	0%

\*Definition (scope) of family-related leave: In all countries where we operate, our personnel are entitled to family leave (maternity, paternity, parental, and childcare leave).

The Chief People Officer is accountable for the implementation of the Health and Safety Policy as well as ensuring that RELEX follows local guidelines and promotes health and wellbeing in all RELEX offices. RELEX team leads have the general responsibility for the safety of their team's working conditions. The team leads have access to further support from the People Team and healthcare professionals when needed, in addition to training materials and written guidance on how to support their team members' wellbeing. Each employee has the responsibility to notify their own team lead or the People Team about unhealthy work practices, risky situations, or inappropriate behavior from their colleagues or external parties.

### Career development and personal growth

RELEX takes actions to support RELEX employees in their career growth and development journeys. Our efforts are documented in the Career Development Policy. The policy documents RELEX's commitments to fair and transparent recruitment and career development opportunities and respective measures available for all employees globally. RELEX's Head of Organizational Development is responsible for career performance management including the development of career paths. The recruitment-related practices are overseen by the Director of Talent Acquisition. The Director of Learning and Leadership Development is responsible for the learning and skill development practices at RELEX.

The policies and information on all career development measures and mechanisms are made available through the employee intranet online.

### Career path models

To increase transparency at the recruitment phase, RELEX has defined basic standards for each RELEX role and (in most cases) main qualifications for different seniority levels within a specific role. These efforts were documented as the career paths models and applicable globally. These models also support the assessment of RELEX employees' skills and maturity in their current roles and give structure to the different career options at RELEX. The documented career path models are available for all employees at RELEX through the internal company portal.

### Regular development discussions

To support professional growth and development, RELEX has adopted an annual cycle of the regular assessments of employees' performance including annual development discussions. Development discussions are the most important annual process where all employees get to reflect on their performance and development, set goals, and review feedback from multiple sources. The RELEX development discussion process has the same three phases for team members and team leads, but team leads will have added responsibilities during these phases. The feedback is collected with a 360-degree review approach through a self-review, peer feedback, team lead review, and an upward evaluation of employee's team lead.

Training and skills development	
Percentage of employees that participated in regular performance and career development reviews	96%*
Average number of training hours per employee	19.2 hours

\*The reported number also includes employees on longer family leaves and sabbaticals, so it's never going to be 100%. In addition, some sales employees do not have annual development discussions, instead these employees have quarterly review calls where their performance is evaluated and discussed on a regular basis.

### Learning

At RELEX, all employees have access to RELEX's own online learning platform, Skills Academy. The training content of the Skills Academy courses allows us to share best practices and give guided learning to newly started and existing employees who decided to upgrade their skills. We utilize Skills Academy for sharing knowledge on the elements of our product solutions and for offering a guided learning path in a format of role-specific courses and subjects of expertise.

### Charitable volunteering

All RELEX employees are entitled to two paid working days per year allocated to charitable volunteering in a charity of their choice. It allows our employees to engage with their communities and make tangible contributions to the causes closest to their hearts. We collect charitable volunteering stories of our employees and share them internally to inspire others to use their volunteering days.

## Diversity, equality, and inclusion

### Pay gap

RELEX conducts a pay gap analysis for female and male employees within the same job titles and geographies bi-annually. The most recent assessment has been conducted in the year 2023. The aim of this analysis is to find out whether RELEX might have hidden gender biases in salaries. The analysis was performed by taking all job roles with at minimum five employees and predetermined salary range within a given geography and comparing actual salaries against the midpoint of the salary range of each role. Based on this analysis, there is no statistically significant difference in pay between genders within the same job titles and geographies.

We have also calculated the gender pay gap by comparing average pay between female and male employees (not considering the job titles).

Remuneration metrics		Comments
Gender pay gap (%)	14.1%	The difference of average base pays between female and male employees, expressed as percentage of the average pay of male employees
Remuneration ratio	4.76	The ratio between the remuneration of the highest paid individual and the median annual total remuneration for its employees. Calculated only based on base pay.

### Diversity and inclusion

RELEX's actions in support of DE&I include conducting HR bias training, using diverse hiring panels, offering equally accessible professional development programs, and encouraging anonymous feedback. Our largest (by employee count) office in Helsinki, Finland is the location where we have the highest rate of non-native (other than Finnish language) speaking employees. To make our non-Finnish employees feel included, RELEX offers Finnish language courses free of charge.

### Privacy

We are committed to complying with the obligations laid down in applicable data privacy laws and promoting the rights of individuals under such laws. We recognize our responsibility as the guardian of our employees' personal data. For this reason – in addition to compliance activities we undertake pursuant to applicable laws – we impose limitations and safeguards when we give our service providers access to our employees' information.

## Targets related to own workforce

Our core target is the employee Net Promoter Score (eNPS). We assess employee engagement, wellbeing, and satisfaction via our annual and monthly surveys combined (see section, [Engaging with own workforce](#)). The results of the assessment are reviewed by RELEX's management team. By looking into eNPS and qualitative feedback received through the assessment, the leadership team works on the next year's wellbeing and employee engagement strategy. In this way, we are able to evaluate the need for new or updating our existing actions related to our own employees.

Our eNPS is measured as a number based on the score (0 to 100). The scope of the target is all employees globally. The year 2024 target was set to achieve the score of 55 and we almost reached the target with the eNPS of 51. The result places us in the top 25% of all technology companies with an average industry eNPS of 25 (Peakon survey tool). The participation rate in the assessment is 87%. We also received over 12,900 comments from the employees.

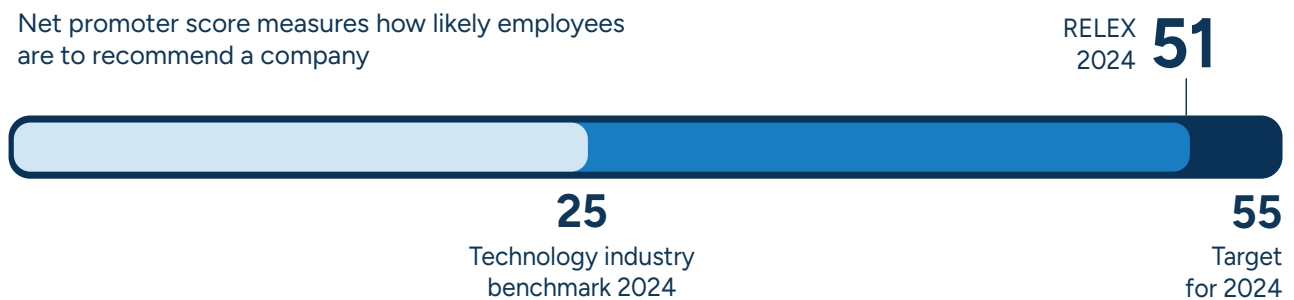
In their feedback, RELEX employees consistently highlight the diverse, international work culture.

RELEX values and ethics are considered as one of our key strengths. Another strong theme is the flexibility offered in work hours and locations. Flexibility to balance professional responsibilities with personal needs, giving greater control and autonomy in the roles is considered a significant advantage. Flexibility was highlighted also in work-life balance, appreciating RELEX's commitment to help maintain healthy boundaries between work and personal life. Opportunities for growth and personal development were highlighted in the comments to impact on overall engagement and work satisfaction. As a core development area, RELEX employees highlighted the goal-setting experience and communication of goals.

In support of the objectives of the Career Development Policy, RELEX also set a target to achieve a 97% completion rate for the mid-year check-ins and development discussions among RELEX employees. The target scope is all RELEX employees globally. The target has been set with consideration of special circumstances (longer leaves, recently joining the company) when RELEX employees are not required to complete development discussions or mid-year check-ins. Overall completion rate for the Annual Development Discussion round 2024 is 96% for RELEX globally, so we are close to reaching our target.

## Employee NPS

Net promoter score measures how likely employees are to recommend a company



The participation rate in the assessment is **87%**

# Characteristics of RELEX employees

## Employee headcount

Employee headcount by gender	Total headcount	%
Male	1332	63.8
Female	683	32.7
Other	5	0.2
Not reported	68	3.3
<b>Total</b>	<b>2088</b>	

## Employee headcount by country

Employee headcount by country*	Total headcount
Finland	940
USA	300
UK	212

\*For countries in which RELEX has 50 or more employees representing at least 10% of its total number of employees

## Employee headcount by contract type

Employee by contract type*	Permanent	Temporary	Non-guaranteed hours
Male	1321	11	7
Female	667	16	4
Other	5	0	0
Not reported	65	3	0
<b>Total</b>	<b>2058</b>	<b>30</b>	<b>11</b>

\*The data are reported in headcount at the end of the reporting period. Interns and working students counted as temporary employees. Non-guaranteed hours are also included in either permanent or temporary categories. Typical reasons for temporary contracts are replacements during long leaves, such as maternal leave and long-term illness. Non-guaranteed hours contracts are based on the wishes and needs of the employee (e.g. because of studying).

## Employee turnover

Employee turnover*	Total headcount
Total number of employees who have left the undertaking during the reporting period	206
Rate of employee turnover	10.5

\*The data are calculated as the number of employees who left the company divided by the average headcount (start+end/2).



## RELEX's top management

Top management*	Total	Male	Female	Other	Not reported
Number of employees (head count) at top management level	14	10	4	0	0
Percentage of employees at top management level	100	71.4	28.6	0	0
Number of employees (head count) under 30 years old	0	0	0	0	0
Percentage of employees under 30 years old	0	0	0	0	0
Number of employees (head count) between 30 and 50 years old	10	6	4	0	0
Percentage of employees between 30 and 50 years old	71.4	42.9	28.6	0	0
Number of employees (head count) over 50 years old	4	4	0	0	0
Percentage of employees over 50 years old	28.6	28.6	0	0	0

\*RELEX's top management includes the company's co-founders, C-level roles (Chief Executive Officer, Chief Technology Officer, and other), and Senior Vice President roles (strategy and corporate development, sales, and operations).

# ESRS S2 Workers in RELEX's value chain

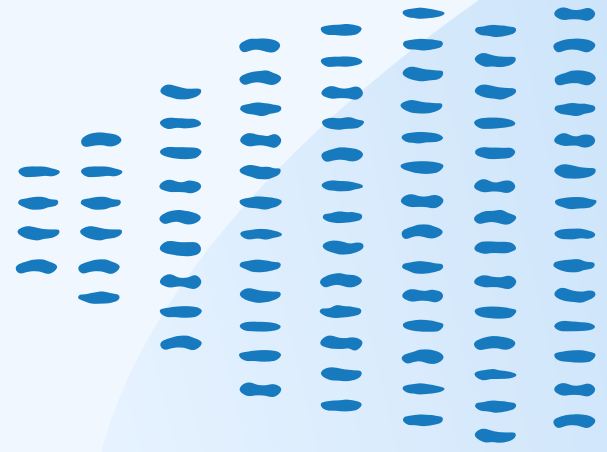
RELEX's [Sustainable Procurement Policy](#) has been developed to address the social impacts, risks, and opportunities related to workers in RELEX's value chain.

The policy sets an expectation that RELEX's suppliers and partners must comply with all internationally recognized human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work from time to time in force. Several cases of human rights and labor rights violations if

identified or suspected can be reported via RELEX's Whistleblowing channel according to the [RELEX Whistleblowing policy](#) or directly to the Head of Procurement.

For potential new vendors and business partners, a know your business partner check called, the Instant Due Diligence+ (IDD+) check needs to be performed before signing any contract. This is an automated digital service that checks whether the service provider is on a sanctions list of the EU, U.S., and other relevant countries, as well as potential issues, such as reported human rights violations.

# Governance information



# ESRS G1

## Business conduct

### Business conduct policies and mechanisms

#### Code of conduct

RELEX is committed to doing business in a sustainable, ethical, and legal manner. RELEX adopted a code of conduct and set of business ethics in order to:

- promote honest, ethical and environmentally sustainable conduct;
- promote compliance with applicable laws, rules and regulations;
- promote basic labor and human rights, including healthy and safe working conditions for employees;
- promote integrity, respect, and responsibility in all business;
- facilitate social dialogue, diversity, and equality;
- promote the protection of company assets, including corporate opportunities and confidential information;
- promote fair dealings and practices;
- deter wrongdoing; and
- ensure accountability for adherence to the code.

The code of conduct applies to all employees at all levels of the RELEX organization globally. All directors, officers, and employees (whether permanent, temporary, or fixed term, including also interns, trainees, freelancers, agency workers, and other hired personnel) are required to be familiar with the code of conduct, comply with its provisions, and report any suspected violations.

Furthermore, RELEX has adopted an Anti-Bribery and Anti-Corruption Policy to reduce the risk of corruption and bribery and Whistleblowing Policy and a whistleblowing channel that RELEX employees, contractors and other relevant persons can use to voice their concerns. RELEX publishes a Modern Slavery Statement annually. The policies and statements are intended to facilitate and promote ethical and legal conduct and to guide the work of the employees. There is more information on these policies in the other sections of this report.

RELEX maintains a healthy corporate culture by, among other things, training its employees on ethical and compliance matters. The training is mandatory for the whole personnel once every two years. Additionally, RELEX maintains information and instructions on RELEX's ethical and legal practices on RELEX's intranet for employees.

#### Anti-bribery

RELEX has zero tolerance towards all forms of bribery or corrupt practices. RELEX will not pay or promise to pay bribes or other illegal payments that are made directly or indirectly to a customer, government officials or anyone else to secure contracts or facilitate RELEX's business. RELEX will not tolerate improper or corrupt payments, improper gifts or entertainment, gratuities, favors, or donations aimed to unlawfully promote business and will refuse to make or accept the same. RELEX has adopted an Anti-Bribery and Anti-Corruption Policy that provides more detailed guidelines for RELEX's personnel and partners.

While RELEX headquarters are in Finland that is a country among the lowest rates of corruption, RELEX has sales and operations in some countries that have higher corruption levels. RELEX's partner network is also constantly growing. This means RELEX has partners in an increasing number of countries, some of which are in relatively high corruption risk areas. This adds more risks of partners committing acts of corruption against RELEX's policies. To decrease the risk, RELEX has anti-bribery training for its partners. Additionally, RELEX performs due diligence checks on new partners before committing to the partner to discover if they have been engaged in bribery.

Within RELEX, the individuals with the highest risk of attempting to give bribes are the individuals whose incentives are tied to sales. This group consists predominantly of the Sales function but also includes people in customer success management and pre-sales. Additionally, leadership positions overall have more influence over decisions such as on closing deals. Thus, the leadership members have higher risks of being tempted by bribery than lower-level employees. The individuals with the highest risks of receiving bribes are either in such leadership positions who decide on purchases or in the Procurement Department. RELEX has implemented ethical training, including anti-bribery training, to reduce the risks. The training is mandatory for all personnel once every two years. Thus, the personnel who are at risk are all required to perform the training.

## Whistleblowing

RELEX encourages its employees to voice their concerns to foster an ethical and sustainable business culture. RELEX tolerates zero retaliation against whistleblowers acting in good faith.

RELEX has implemented a group-wide central whistleblowing channel that all employees, partners, and others who suspect wrongdoings at RELEX can use to report their concerns. Additionally, RELEX has company-specific whistleblowing channels in countries where the group-wide central channel would alone be insufficient.

The Whistleblowing Policy has been approved by RELEX's board of directors. In accordance with the Whistleblowing Policy, relevant incidents made to the whistleblowing channel will be reported to the Audit Committee of the RELEX board of directors. The Audit Committee monitors whistleblowing incidents.

Whistleblowing channels are available at RELEX's website. The whistleblower may choose to report incidents anonymously. RELEX's employees can also find information and a link to the channels on RELEX's intranet.

### Corruption and bribery incidents & ethics training

Number of bribery and corruption incidents and convictions related to RELEX	0
Percentage of personnel that has completed the legal and ethical training (%)*	96.5

*\*The invitations to complete the training are sent out automatically to all employees, including those on long-term leaves unless they completed the training before the start of their leave. The training takes place bi-annually.*

RELEX trains its personnel on the Whistleblowing Policy and channel in mandatory ethical and legal training once every two years. The training content includes topics of business ethics and compliance with the RELEX code of conduct and Environmental Policy.

## Modern slavery

RELEX is dedicated to eradicating modern slavery and human trafficking from its operations and supply chain. RELEX also expects that all its business partners and suppliers will act in a manner that is consistent with RELEX's principles and adhere to ethical business conduct.

RELEX publishes a Modern Slavery statement annually. The statement describes RELEX's commitment to ensuring no modern slavery or human trafficking happens in any part of its business, including employment practices and supply chains. Each annual statement is approved by RELEX's board of directors.

# Corporate governance

## Governance model

RELEX has adopted a one-tier governance model in which shareholders hold the greatest decision-making power. They exercise it at the Annual General Meeting, when shareholders vote to elect the company's board of directors as well as its auditor. At the General Meeting, the board of directors submits proposals regarding the number of seats, election processes, and board member payment to voting shareholders. The largest shareholders nominate their candidates for the board of directors to ensure their views are represented.

The board of directors is responsible for the appointment of the company's managing director; at RELEX, this role is called the Group CEO. The Group CEO in turn is supported by the RELEX Leadership Team.

## Shareholders and general meeting

Shareholders make key decisions concerning RELEX, such as:

- Appointing or dismissing members of the board of directors;
- Approving financial statements;
- Deciding on the distribution of profits, such as dividends.

Shareholders are invited to a general meeting to make decisions. The general meeting is held at least annually. The general meeting is held in accordance with the Finnish laws and the Articles of Association of RELEX. The board of directors convenes the meeting.

## Board

The board of directors is responsible for strategic management. The board of directors makes decisions to guide RELEX's overall strategy and goals, including matters concerning sustainable development. The board also approves RELEX's major governance policies, such as the code of conduct and business ethics.

The board has put in place a board charter that governs the work of the board. In accordance with the charter, the duty of the board is to take care of the administration and organization of RELEX's operations and to duly promote the interests of RELEX and its shareholders. This includes overseeing the financial administration, bookkeeping and auditing, as well as setting RELEX's strategy and making strategic decisions. The board complies with the requirements under the applicable Finnish laws and the Articles of Association of RELEX.

One of the board members, Johanna Småros, leads the sustainability function at RELEX. Via this role, she is able to keep the board informed of sustainability matters at RELEX. Together with other functions at RELEX, the sustainability function manages, oversees, and promotes sustainability at RELEX Group. More information is also available in the section, [Sustainability governance](#).

## Composition of the Board

The Board of Directors consists of 7 members as per 31st of December 2024. The Board includes the three founders of RELEX: Mikko Kärkkäinen, Michael Falck and Johanna Småros who are also members of RELEX's executive leadership team. The rest of the Board Members, Robert Burke, John Doran, Muz Ashraf and Paul Morrissey are representatives of the biggest shareholders of RELEX and are independent of the company, which is 57% of the entire Board.

## Board diversity

Gender	
Male	87.5%
Female	12.5%

Age	
<30 years	0%
30–50 years	87.5%
50+ years	12.5%

## Introductions of board members



### **Bob Burke, chairman**

**Background:** Bob is a Strategic Advisor at TCV. He has over 35 years of experience in the tech-

nology sector, focusing on software and internet investments. He was the CEO of Art Technology Group (ATG), where he led a successful turnaround that positioned ATG as a leading e-commerce software provider before its acquisition by Oracle in 2011. Previously, Bob served as CEO of Quidnunc and as President of ePresence Solutions (formerly Banyan Systems), overseeing its transition from network operating systems to new business lines. He began his career at Digital Equipment Corporation, managing global systems integration operations.

**Education:** Bob holds a B.S. in Physics from Eastern Michigan University.



### **Muz Ashraf, board member**

**Background:** Muz is a General Partner at TCV. He joined TCV in 2015, focusing on software,

fintech, and internet investments. He has been involved with numerous companies, including Ankorstore, Celonis, Klarna, and Miro. Before TCV, Muz worked at Vector Capital, specializing in software and internet investments, and began his career in investment banking at Merrill Lynch. He also worked at T. Rowe Price, focusing on European technology investments.

**Education :** Muz earned an M.B.A. from Harvard Business School and holds a B.A. in Economics and an M.S. in Management Science & Engineering from Stanford University.



### **John Doran, board member**

**Background:** John is a General Partner, Executive Committee at TCV. John joined TCV in 2012

and helped establish its London office. He focuses on consumer, fintech, and enterprise software investments and serves on TCV's Executive Committee. He has worked with companies like Adevinta, Klarna, Miro, and Revolut. Previously, John was an investor at Summit Partners and began his career in investment banking at Morgan Stanley.

**Education:** John holds an M.B.A. from Harvard Business School and a B.A. in Economics (with honors) from Harvard College.



### **Paul Morrissey, board member**

**Background:** Paul is a Senior Managing Director at Blackstone

Growth, leading its European operations. Before joining Blackstone in 2021, he was a partner at Battery Ventures, where he focused on late-stage growth equity investments and opened the firm's European office. Earlier, Paul worked in Goldman Sachs' investment banking division, focusing on technology, media, and telecom.

**Education:** Paul graduated from Stanford University with a B.S. in Economics and was a four-year member of the varsity men's tennis team.



**Michael Falck,  
board member**

**Background:** Michael is a co-founder and leads the Pre-sales Analytics function of RELEX

Solutions. Prior to founding RELEX in 2005, Michael did supply chain research at Helsinki University of Technology (now Aalto University).

**Education:** Michael holds a M.S. in Industrial Management and Engineering from Helsinki University of Technology.



**Mikko Kärkkäinen,  
board member**

**Background:** Mikko is a co-founder and the CEO of RELEX Solutions. Prior to

founding RELEX in 2005, Mikko did supply chain research at Helsinki University of Technology (now Aalto University) and published numerous academic papers in addition to his doctoral dissertation.

**Education:** Mikko holds a D.S. and M.S. in Industrial Management and Engineering from Helsinki University of Technology.



**Johanna Småros, board  
member**

**Background:** Johanna is a co-founder and the Chief Sustainability Officer of RELEX

Solutions. Prior to founding RELEX in 2005, Johanna did supply chain research at Helsinki University of Technology (now Aalto University) and published numerous academic papers in addition to her doctoral dissertation.

**Education:** Johanna holds a D.S. and M.S. in Industrial Management and Engineering from Helsinki University of Technology.

## Board committees

RELEX has two board committees: Audit Committee and Compensation Committee. The board appoints the members of both committees and the chairs of the committees annually. Each committee must have at least three members.

The duties of the Audit Committee consist of:

- Monitoring and reviewing the financial, credit, and tax position of RELEX and the financial reporting process;
- Reviewing the audited financial statements and the auditor's reports concerning the financial statements;
- Monitoring and assessing the financial auditing and the scope and standards of financial auditing;
- Monitoring and evaluating the independence of the financial auditor, including any services other than the auditing provided by the auditor;
- Preparing recommendations for the choice of the financial auditor;
- Monitoring compliance with the governance policies set by the board;
- Monitoring and assessing the effectiveness of the internal control and risk management systems and practices;
- Monitoring and evaluating the IT and information security strategy and practices;
- Monitoring and evaluating the processes to ensure compliance with laws and regulations;
- Monitoring whistleblowing practices and reports, and if necessary, supervising and leading the investigation and remedial process of an incident reported by a whistleblower;
- Undertaking other duties assigned by the board.



The duties of the Compensation Committee consist of preparing:

- The remuneration policy for RELEX's board, CEO, and the leadership team and other key managerial personnel;
- The proposals for the remuneration of the board members for the approval of the shareholders;
- Relevant material on other matters concerning RELEX's remuneration systems, as deemed necessary by the committee or the board.

### **Executive leadership**

The executive leadership team of RELEX supports the group CEO in the management of the company. The executive leadership meets in two regularly convening leadership team compositions: group level and parent company level.

### **Group-level leadership team**

The leadership team focuses on supporting RELEX's strategic planning, decision-making, and operations on a group level. Its primary function is to assist the CEO in executing the strategy and managing operations. The leadership team members are appointed by the CEO. The group-level leadership team meets regularly as scheduled or at the CEO's discretion to discuss a wide range of company matters, be it strategic, financial, personnel-related, or other significant issues.

### **Parent-company-level leadership team**

The parent company level leadership team has a similar role as the group level leadership team: it supports the CEO in strategic planning, decision-making, and operations, and meets regularly as scheduled or at the discretion of the CEO. The focus, however, is on matters that specifically concern the parent company of RELEX Group. For example, the parent-company-level leadership team discusses matters such as the offices spaces of the parent company and personnel-related matters of the parent company.

## **Employee representation**

The employees of RELEX's parent company are represented through the Employee Council that is elected by the employees at the parent company. The reason for the council's existence is to fairly present all the employees of RELEX Finland, the largest RELEX location by employee count.

The council consists of one employee representative, a deputy representative and additional council members (maximum seven), as well as the health and occupational safety representative. In total, the Employee Council is 10 people. The representative holds the legal power of negotiation and rights dictated by the Finnish employment law, such as the ability to sign local labor agreements and being protected from lay-offs. In practice, the representative and the council work in unison.

One of the council members is a member of the parent company level leadership team to facilitate employee engagement and the consideration of the views of the employees.

The employees in all RELEX's group companies are entitled to unionize or have other forms of representation in accordance with applicable local laws in the country where the group company is established. In addition to the employee council in Finland, the employees have elected representatives in the following RELEX group companies: RELEX Solutions GmbH in Germany (Works Council) and RELEX Solutions SAS in France (Comité Social et Économique, CSE).

## **Supply chain**

### **Business conduct in supply chain**

RELEX has recognized the importance of its partner network in ensuring ethical conduct. RELEX trains its sales and implementation partners on anti-bribery and maintains information and instructions for the partners on RELEX's partner site. RELEX's whistleblowing channel is available publicly online so that all partners and suppliers can voice their concerns.

In accordance with RELEX's Know Your Business Partner Policy, RELEX performs due diligence on its partners and suppliers to facilitate compliance with laws on matters such as trade sanctions, embargoes, anti-bribery and human rights.

Additionally, RELEX has a supplier code of conduct of RELEX to promote and ensure sustainability, integrity, and transparency in the business relationship between RELEX and its suppliers. RELEX expects its suppliers, including their employees, directors, representatives, and subcontractors to respect and comply with the code. RELEX requires its key suppliers and partners to either accept the code or commit to their own equal ethical and legal code of conduct.

### Information on the payment practices

Most suppliers have a standard payment term of 30–45 days, and RELEX pays the invoices within the terms or, in most cases, earlier than the due date if invoices are provided in a timely manner. If invoices are submitted to RELEX late (after the due date), they are processed and paid with priority once approved. Team lead or manager approvals are required for all invoices that are received/processed before payment can be initiated.

Information on payment practices	
Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated	15–18 days
Percentage of payments aligned with standard payment terms	100%
Number of outstanding legal proceedings for late payments	0

# Appendix

The background features a light blue gradient with several overlapping circles of varying shades of blue. In the top right and bottom left corners, there are clusters of small, white, teardrop-shaped dots arranged in a semi-circular pattern. In the bottom right, there are thin, dark blue curved lines that overlap with the larger circles.

## Emission factors in RELEX GHG emissions inventory

Scope	Category	Procedures and assumptions	Sources
Scope 1	Company cars	<p>GHG emissions were estimated based on contract details of maximum distance and duration, distance in kilometers is multiplied with the months used, and multiplied by specific emission factors provided by RELEX for each car respectively along with unit conversion.</p> <p>If CO<sub>2</sub> emissions were presented as a range, the highest number has been chosen. If there was unclarity on the exact model, petrol engine has been assumed.</p>	www.auto-data.net
Scope 2	Purchased electricity, heating and cooling	Emission factors from energy suppliers were used when available and if not, country average emission factors.	<p>Supplier-specific emissions</p> <p>Carbon database initiative 2024</p>
Scope 3	Purchased products and services	<p>Calculations included supplier-specific emission factors and product-specific emissions, when available. When spend-based emission factors were used, base emission factors were applied (2022) with inflation correction and currency exchange rates.</p> <p>For purchased electronic devices, product-specific emission data was used when available or estimated based on a similar device model. Only manufacturing and transportation related emissions were considered, excluding the use and end-of-life emissions.</p>	<p>Supplier-specific emissions</p> <p>U.S. Environmental protection agency. 2023. Supply Chain Greenhouse Gas Emission Factors v1.3 by NAICS-6</p> <p>Product-specific emissions</p>
	Fuels and energy primary production and transport	All relevant emission sources related to indirect emissions from purchased energy were accounted. This includes Well-to-tank (WTT) emissions for all energy, transmission and distribution (T&D) losses for electricity and district heating, and WTT and T&D for private cloud.	<p>DEFRA, UK Government. 2024. Greenhouse gas reporting: conversion factors 2024</p> <p>Carbon database initiative 2024</p>
	Business travel and commuting	<p>Emission factors of flights included only direct effects of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions, not considering the effects of radiative forcing. For known flights, emissions were calculated using distance-based emission factors (DEFRA). The emissions for the remaining part of flight expenses were calculated with a spend-based factor, derived from DEFRA.</p> <p>Employee commuting survey was the main source of information for GHG emission accounting in employee commuting category. Emissions from remote working were estimated based on number of remote working days, average energy consumption and country average emission factors.</p>	<p>DEFRA, UK Government. 2024. Greenhouse gas reporting: conversion factors 2024</p> <p>U.S. Environmental protection agency. 2023. Supply Chain Greenhouse Gas Emission Factors v1.3 by NAICS-6</p>
	Leased assets	Product-specific emission data was used when available or estimated based on a similar device model. 60% of production and transportation related GHG emissions were included as devices can still be used after RELEX's usage.	Product-specific emissions

