

# Sustainability Report

# 2024

orasgroup



HANSA

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## Company Overview

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# This is Oras Group

Oras Group is a significant European provider of sanitary fittings. We are the market leader of the Nordics and strongly positioned in many other European regions. Our success is driven by delivering an excellent user experience through two strong brands, Oras and HANSA.

The group's parent company Oras Ltd. has its headquarters in Rauma, Finland, with additional offices across Europe. Our manufacturing sites are currently in Kralovice (Czech Republic, closing in 2025), Olesno (Poland), and Rauma (Finland). Oras Group is owned by Oras Invest – a Finnish family business and industrial owner.

→ Read more: [www.oras.com](http://www.oras.com), [www.hansa.com](http://www.hansa.com), [www.orasgroup.com](http://www.orasgroup.com)

## The Smartest and Most Sustainable Water Experiences for Everyone

We carry out our sustainability efforts through a sustainability program structured around three streams: Developing a sustainable supply chain, offering sustainable products and services, and fostering a responsible workplace.

We are committed to promoting the UN Sustainable Development Goals



1,109

Total employees

Net sales

200.2

EUR million

Carbon footprint

51,153

tCO<sub>2</sub>e

Products with water and energy saving features

>90%

Including faucets and showers

Diversity

23%

Share of women in management positions

## Our locations

Oras Group's own staff is spread out across 16 European markets. The Oras brand is offered in the Nordics, Baltics and Poland, whereas HANSA's main markets are in the DACH area and BeNeLux countries.



Production & offices

Rauma, Finland

Olesno, Poland

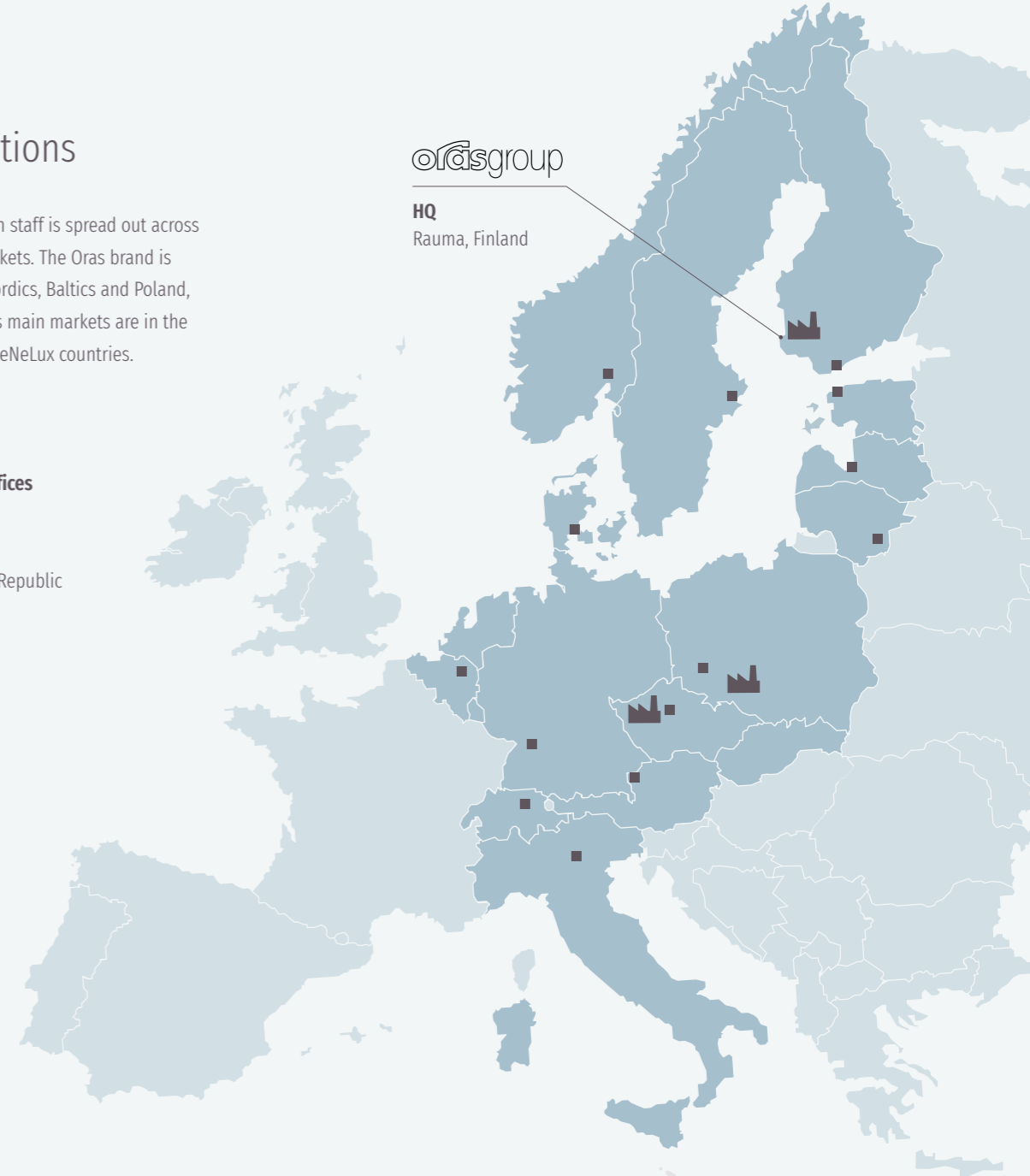
Kralovice, Czech Republic



Offices

orasgroup

HQ  
Rauma, Finland



# Greetings from our CEO

Sustainability is a key part of Oras Group’s strategy. It is guided by our owner’s vision of sustainable value creation. We are committed to minimising our negative environmental and climate impact, promoting positive change throughout our operations and value chain, and fostering a responsible workplace.

Oras Group’s sustainability efforts are built on the UN Sustainable Development Goals (SDGs), which were initially set for the company in 2021. In 2023, we established time-bound sustainability targets for 2030. Climate change and limited availability of fresh water drive the demand for sustainably produced products that help conserve water and energy. Our mission – The Smartest and Most Sustainable Water Experiences for Everyone – is the answer to this growing demand. We are continuously seeking new and innovative solutions to advance our mission by investing in product technology and launching more sustainable and smarter product solutions. All our new product families have built-in features for saving water and energy. It can be said that sustainability will contribute to the demand for our products in the future and is thus one of the foundations of our growth.

As a responsible employer, we create opportunities for learning and strive for diversity of thought and equality in all people processes. In 2024, we renewed our Code of Conduct broadening its scope highlighting our positive impact and dedication in doing

“Sustainability is one of the foundations of our growth. Our mission answers to this, and we are continuously seeking new ways to further advance it.”

things the right way. Also, we prioritise employee wellbeing in many ways. However, workplace safety presented a challenge in 2024: previously positive development stalled, and our LTIF (lost time injury frequency) increased. Active efforts continue to reduce the number of occupational injuries leading to absences.

Since 2019, we have worked to streamline our supply chain, aiming to improve the customer experience and reduce our carbon footprint. This ongoing development program includes significant investments in our operations. Adding new chrome plating lines to our factories will be one key milestone. Supported by technology investments and efficient logistics, we strive to improve our customer experience through higher quality and better delivery capabilities. These advancements also significantly reduce our environmental impact by promoting energy efficiency and optimised transportation.

In 2025, our focus will be on completing the supply chain development program. We will also introduce and advance new, more innovative product solutions. These will allow us to further our mission while meeting consumer and user expectations for sustainability, quality, and safety. All this will be achieved with the well-being and safety of our employees as a top priority.

**Kari Lehtinen,**  
President and CEO



# Year 2024 highlights



## Delivering value with our products and services

We expanded the Oras and HANSA bathroom selection with a range of timeless colours. Our classic chrome has been enriched with carefully curated options, offering customers greater inspiration and choice. Meanwhile, our digital services continue to deliver increasing value by empowering decision-making through real-time water usage data.

→ Read more: [oras.com/en/bathroom](https://oras.com/en/bathroom)

## Added channels to serve our customers

We strive to continuously improve our customer experience and strengthen our ability to serve our customers in the best possible way. In 2024, we launched a brand-new sales channel for the company, when our first-ever eCommerce platform was introduced in Norway. The additional channel provides our professional customers with a flexible way to order products directly from us.

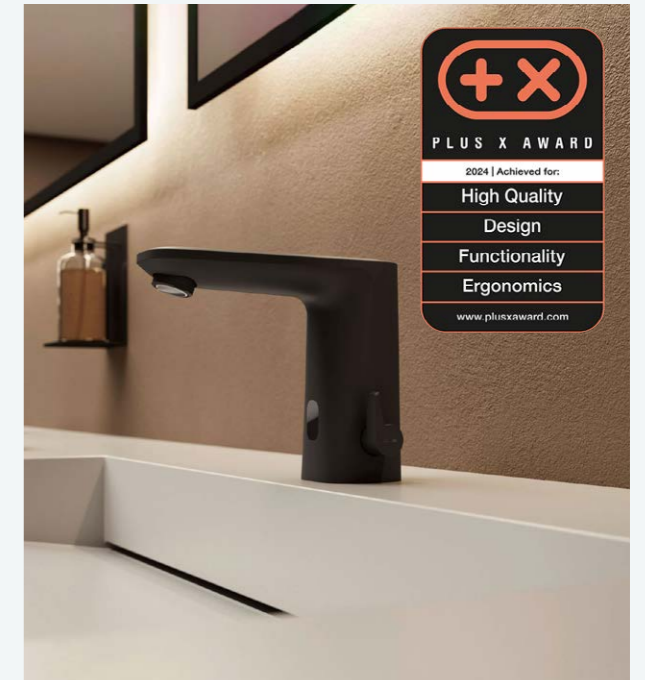
## Doing things the right way

In 2024, we renewed our Code of Conduct, creating an extensive ethical framework that guides how we do business. It sheds light on our core values, connecting them to everyday decisions and ensuring we always operate with the highest standards of business conduct. To illustrate our commitment to these new guidelines, 100% of our employees completed comprehensive Code of Conduct training, which provides guidance on addressing misconduct and speaking up.

→ Read more: [orasgroup.com/code-of-conduct](https://orasgroup.com/code-of-conduct)

## Enhanced supply chain performance

The new plating line for our brass-bodied products is now operational at our Polish factory. The successful completion of this new line represents one of our many investments in manufacturing technology. We are also preparing to commission a similar brand-new line in Rauma, Finland. In addition to expanding our production capabilities, we have streamlined our logistics to enhance supply chain efficiency and reduce transportation-related environmental impact.



## Acknowledged for quality

Our updated HANSAELECTRA touchless product family was honoured with a Plus X Award in Germany as a statement of its quality, functionality, design, and ergonomics. In Norway, Oras was named the NOBB – VAVS Supplier of the Year 2024 due to exceptional product data quality.

# Mission, vision and values

Our vision, mission, and values are the compass that guides us forward. They define our direction, purpose, and focus both in the long-term and each individual day. These principles also shape how we interact with our customers, our colleagues, and our broader community. Together, our vision, mission, and values form the foundation of our company culture and identity.

## Mission

**The Smartest and Most Sustainable Water Experiences for Everyone**

### The Smartest and Most Sustainable

We build on our traditional strengths – in technology, water and energy-saving products, expertise, and innovation.

### Water Experiences

We deliver value beyond faucets, components, technologies, interiors, and design.

### For Everyone

We are committed to enabling the most sustainable ways to consume water in private and public spaces – for the benefit of all communities.

We win with more than products:

We create the smartest and most sustainable water experiences for the measurable benefit of our customers and partners.

## Vision

**The Perfect Flow Company**

Our vision refers to the perfect flow of water in all spaces and interfaces. It also pushes us towards perfected logistics and supply chain, optimised use of user data and optimal user and installer convenience.

As a place to work and as a company, we keep working towards a perfect flow in everything we do.

## Values

**The basis for everything we do**

### Courage

We have an open-minded approach to new things.

### Fairness

We encourage fairness in decisions and in behaviour.

### Effectiveness

Achievement by doing the right things.

### Openness

Trust for each other, honesty.



# Products and services for responsible water use

As part of our mission to create the Smartest and Most Sustainable Water Experiences for Everyone, we want to support responsible and safe water use for the benefit of all communities in both private and public spaces. Take a look at some good examples of products doing just that.



Shower system  
Oras Optima Style / HANSAVIVA

**Safe, durable, and efficient showering**

- Engineered to maintain reliable performance over time
- Built-in safety stop at 38°C prevents scalding and ensures safer showering
- EcoFlow feature limits the shower’s flow rate – saving water without compromising on comfort

Touchless washbasin faucet  
Oras Electra / HANSAELECTRA

**A touchless leap in hygiene and resource efficiency**

- Highly responsive sensors allow for up to 50% lower water usage\*
- Improved hygiene and reduced cross-contamination
- Integrated anti-scalding feature prevents burns caused by hot water
- Select versions come with a power module that uses special turbine technology to generate power from water usage



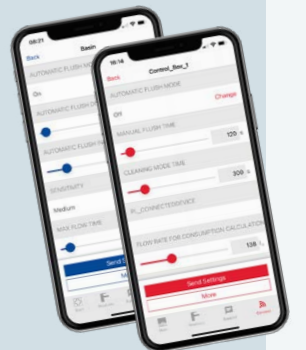
Digital hand shower  
Oras Hydractiva Digital / HANSAACTIVEJET Digital

**Mindful water use with real-time feedback**

- Demonstrated to reduce water consumption by 22%\*\*
- Built-in display and light signal help adjust habits with info on water usage and temperatures
- Built-in turbine generates all the energy needed for the shower’s screen and sensors
- When paired with our Digital Hand Shower App, users can set goals, track water usage, and see tips for further savings

**Sustaining resources with responsible services**

- The ORAS360/HANSA360 app for Bluetooth-equipped smart faucets allows users to adjust settings (such as flow times and sensor sensitivity) and quickly address potential malfunctions
- Oras/HANSA Digital Services provide real-time water management data for making informed decisions that improve efficiency and reduce wastefulness
- Oras/HANSA app and Digital Services also give users an option to create flush programs to limit legionella in the water system due to stagnated water
- Environmental Product Declarations (EPDs) with third-party verified lifecycle carbon footprint data available for 35% of our products
- Our 10-year availability guarantee for functional components and spare parts ensures longer product lifecycles



\* Unified Water Label Association - Taps & Showers Technical Criteria (August 2024).

\*\* Management Science 2018 - Overcoming Salience Bias: How Real-Time Feedback Fosters Resource Conservation; Tiefenbeck, Goette, Degen, Tasic, Fleisch, Lalive, Staake (2016).



## Sustainability statement

# Sustainability is part of Oras Group's strategy

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# General information

## ESRS 2

# General disclosures

Sustainability is an integral part of Oras Group’s strategy. This is especially visible through our mission: The Smartest and Most Sustainable Water Experiences for Everyone. Our approach to sustainability is driven by our owner’s vision for sustainable value creation, and we are committed to the UN Sustainable Development Goals.

## Basis for preparation

This Oras Group 2024 sustainability report applies the European Sustainability Reporting Standards and selected disclosure requirements with reference. The scope of consolidation of this sustainability report is the same as the consolidated financial statements of Oras Ltd., including its subsidiaries in all countries of operation. The sustainability report is prepared annually from the same time period as financial statements (January 1st to December 31st). The sustainability statement covers Oras Group’s upstream and downstream value chain in sections such as the double materiality assessment, value chain description, and GHG accounting. The exclusion or inclusion of value chain information is stated separately where relevant.

## Governance

### The role of the administrative, management and supervisory bodies

Oras Group’s administrative, management and supervisory bodies include the following: the Board of Directors, the Personnel and Remuneration Committee (as a board committee), and the Group Management Team. The General Meeting of Shareholders is the highest decision-making body in Oras Group. The composition of the Board of Directors, the Group Management Team, the members’ roles, and the governance model on sustainability matters is shown in a table on this page. The company’s board does not include representatives of

employees or other workers, but the company has several processes such as the European Forum to promote engagement between employees and management. The board’s gender diversity ratio is 2:5 and the percentage of independent board members is 71%.

### The company’s governance regarding sustainability matters

<b>Board of Directors</b>	Markus Lengauer, Chair of the Board
	Eerik Paasikivi, Deputy Chair of the Board
	Mona Abbasi
	Maciej Gwozdz
	Petri Kokko
	Heli Leskinen
	Joonas Sandholm
<b>CEO</b>	Kari Lehtinen
<b>Group Management Team</b>	Kari Lehtinen, CEO
	Jaakko Marjanen, CFO
	Christoph Gasser, CSO
	Outi Sortino, CHRO
	Yura Biryukov, CPO
	Johan Åkerholm, COO
	Christina Jensen (Ossi Ahto as interim until 12.1.2025 after which Jirko Kangas-Müller), CMO
<b>Sustainability Steering Committee</b>	Selected Group Management Team members and employees leading the sustainability program focus areas

The Personnel and Remuneration Committee is included in the governance structure as a board’s committee.

The Oras Group Authorisation Policy defines the decision-making authorities and the approval requirements within Oras Group. The General Meeting confirms the financial statements as well as decides on dividends and the election of Oras Ltd. Board members and auditors. The Board of Directors is responsible for the company's management and supervision of the company's assets and business operations. The main duties of the Board of Directors include, for example, approving Oras Group's long-term strategy, annual plans, and budgets. The duties also include ensuring adequate planning, information and control systems intended for managing risks in operations. The Group Management team is, for example, responsible for preparing business plans and implementing the company's strategy, as well as supervising risk management and monitoring major day-to-day operating actions and decisions. Sustainability, as it is considered as part of the company's strategy and risk management, is included in the above-mentioned duties.

Oras Group's Risk Management Policy reflects the responsibilities and governance process of the company's management of risks and opportunities. The Board of Directors approves main policies and reviews key risks, as well as the effectiveness of the organization's risk management. The Group Management Team is responsible for reviewing and approving the risk management approach, reviewing the company's risk profile, reporting material business risks to the Board, fostering a risk-aware culture, and developing and maintaining risk-related processes and controls. The Chief Financial Officer has the overall responsibility for the risk management process and reporting activities, maintaining the Risk Management Policy, and developing the risk management process and reporting. Risk and opportunity analysis is part of the Group's long-term strategic planning as well as the annual planning process for different company functions. To manage risks, risk response plans are included in the overall action plans of the functions. The implementation of the risk response action plans is conducted as part of normal operations, development work, and decision-making. Progress on the risk response action plans within each function is monitored by the Group Treasury and

Tax Manager together with the individuals responsible for risk response actions. Oras Group's risk categories have environmental, social, and governance (ESG) risks included within them.

The Board of Directors and the Group Management Team consist of experienced business professionals with backgrounds from several industries and countries. They have acquired vast experience in board and leadership work across multiple areas of business matters. Members' experience includes, among others, similar roles in geographical locations relevant to Oras Group and in the construction and manufacturing industries. When it comes to sustainability experts, in 2024 a new position of Manager, Group Sustainability was added to the company, providing further expertise in sustainability matters and ESG-related impacts, risks and, opportunities. Additionally, several employees hold relevant expertise in specific ESG matters connected to their role, such as social responsibility, health, safety, and environment. Internal or external resources may be utilised for training administrative, management, or supervisory bodies or employees as necessary.

The Oras Group Authorisation Policy specifies the roles and responsibilities of the administrative, management, and supervisory bodies regarding business conduct matters. The Board of Director's duties in business conduct matters include, for example, approving Oras Group's organisational structure, ensuring the company's administration and operations are managed appropriately, approving Oras Group's main policies, appointing Committee members and approving their working procedures, and ensuring that good corporate governance is complied with throughout the Group. We have implemented a Code of Conduct to support Oras Group's sustainability and success and provide the Group and its stakeholders with commonly accepted guidelines and perspectives for future decisions. The Code of Conduct describes the company culture, accepted practices, and commitment to compliance with laws and regulations. Read more on [Business conduct](#) in the chapter allocated to the topic in this report.

Regarding the expertise of the administrative, management, and supervisory bodies on business conduct matters, the Board members bring vast experience from similar positions in other board and management roles across various companies and industries, reinforcing their expertise in business conduct matters. The Management Team members are likewise seasoned business professionals with experience from similar industries and other leadership roles, further supporting the Management Team's business conduct expertise.

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

Oras Group's sustainability work is steered by a Sustainability Steering Committee comprised of selected Group Management Team members and employees leading the different sustainability focus areas. The Sustainability Steering Committee meets four times a year to follow up on and make decisions based on the status and progress of the company's sustainability work in topics such as policies, actions, metrics, and targets. The most significant sustainability-related matters are reviewed by The Group Management Team and the Board on a need basis. The company's sustainability-related impacts, risks, and opportunities identified in the double materiality assessment in 2024 were presented to the Group Management Team and the Board of Directors. In 2024, other sustainability related matters reviewed by Group Management Team and Board were the company's development plans related to the Corporate Sustainability Reporting Directive, as well as matters that are covered within the company's risk management process. The list of the sustainability-related material impacts, risks, and opportunities reviewed by the Management Team and Board is visible on [page 14](#).

## Integration of sustainability-related performance in incentive schemes

Regarding sustainability-related incentive schemes for the administrative, management, and supervisory bodies, the group CHRO and COO had such schemes in place in 2024. For the CHRO,

they were related to absenteeism, while for the COO, they were indirectly tied to absenteeism through the labour productivity metric. Climate-related considerations were not factored into the remuneration of the members of the administrative, management and supervisory bodies in 2024. The Personnel and Remuneration Committee reviews and makes recommendations to the Board about remuneration guidelines and incentive schemes.

## Strategy

Sustainability is part of Oras Group's strategy. This is especially visible through our mission: The Smartest and Most Sustainable Water Experiences for Everyone. Oras Group's sustainability is based on our owner's vision for sustainable value creation, and we are committed to the UN Sustainable Development Goals. Oras Group is owned by Oras Invest, a Finnish family business and industrial owner. The Group's parent company Oras Ltd. has its headquarters in Rauma, Finland. Oras Group currently has three manufacturing sites: Kralovice (Czech Republic, closing in 2025), Olesno (Poland) and Rauma (Finland). In total, the Group has staff in 16 markets and offers two strong brands, Oras and HANSA. In 2024, Oras Group's net sales were 200.2 million euros and it employed 1,109 people. The company's sustainability work is organised around a sustainability program with focus areas in a sustainable supply chain, sustainable products and services, and a responsible workplace. Each stream has set targets for 2030 and has named stream leads advancing the focus areas, supported by company management.

Oras Group manufactures sanitary fittings, such as faucets, showers, shower systems, and spare parts. Our main product groups include washbasin faucets for bathrooms, hand showers and shower systems, kitchen faucets, various wall and washbasin faucets specifically designed for the health and care sectors, and washbasin faucets for public spaces. The company offers a significant range of touchless washbasin faucets traditionally sold to public spaces

but increasingly purchased by private households. Touchless faucets exemplify products that can benefit both people and the environment through improved hygiene and features for saving water and energy. We offer a wide range of spare parts and an extended availability guarantee to enhance product reparability and to lengthen product life cycles.

Digital services represent a recent, upcoming addition to the company's offering. Its focus is on services that support water and energy savings through real-time data on their consumption. These services include required sanitary fittings, faucets or showers, and a cloud-based data environment. The faucets or showers include technology such as an energy autarkic turbine, which renders external power sources needless, thus saving energy and increasing user convenience.

During the reporting year, we introduced a wide range of new and updated products for both the bathroom and kitchen. New colours expanded existing product families in both areas. An updated version of one of our touchless washbasin faucet lines included multiple functionalities for safety, connectivity, and water and energy saving. In addition, one brand-new product family was launched for the bathroom, showcasing a new design and innovative water experiences. Apart from standard portfolio development activities, there were no significant product removals during the reporting year.

Of the 16 markets Oras Group's own staff operates in, the most significant ones are Finland, Germany, Norway, Sweden, Austria, and Denmark. Our products reach markets and end-users via different distribution channels visualised in our value chain infographic on [page 13](#). Oras Group's direct customers, such as wholesalers, receive products directly through our deliveries. Indirect customers consist of stakeholders that can create demand for our products, such as installers, retailers, wholesalers, and architects. Sales and marketing activities target both direct and indirect customer groups.

The company's primary route to market flows through a three-tier system: wholesalers, professionals, and end-users. The largest direct customer group is wholesalers, from which

products are purchased by two major groups: installers and retailers. End-users and consumers constitute another significant indirect customer group, creating demand for our products on the third step of the route to market. Specifiers, construction and renovation companies, housing companies, and property owners are also key stakeholders.

The growing influence of consumers on decision-making has created opportunities for additional, more direct routes to market and end-users. Consequently, Oras Group has entered new channels to reach consumers directly, such as online retailers and do-it-yourself retailers.

## Business model and value chain

Oras Group's value chain, key value chain stakeholders, and other key stakeholders are visualised on [page 13](#). The company's position in the value chain lies in manufacturing of products that are delivered to business-to-business and business-to-consumer markets via different distribution channels. Oras Group's digital services are not depicted in the value chain infographic. To manufacture our products, we rely on a network of material suppliers that provide the main materials for producing faucets, showers and shower systems, components, and spare parts. Once manufactured, products traditionally flow through the three-tier system, as described above, or alternative distribution channels. Our products are used in both residential and non-residential buildings, such as homes, hospitals, hotels, and schools. For long-lasting products like faucets and showers, maintenance and repairs can typically be performed by professionals throughout the product's lifetime. At the end of their life cycle, product materials are recycled or disposed of in locally compliant ways. Oras Group's products offer several benefits to end-users. Our faucets and showers are long-lasting, safe, high-quality, and repairable, with many of them also including water and energy saving features. Our active collaboration with professionals, such as installers and architects, allows us to design products that serve these groups well. For example, easy and safe installation, along with the availability of product data, provide value to professionals.

Smart and sustainable products and services are at the core of Oras Group's product portfolio. We have set targets related to sustainable products and services as follows:

- Our products include water and energy saving features
- We develop our products and materials to be part of circular economy
- Our business includes products or services including hygiene and usability.

These targets apply to all our customer categories and geographical sales areas. At the end of 2024, over 90% of our products (faucets and showers) had features for saving water and/or energy. We currently incorporate circular economy principles into our products by offering long lasting and repairable designs, with good spare part availability, which includes a 10-years availability guarantee for functional spare parts. Additionally, we utilise recycled materials, such as metals, in our products.

Regarding how the company's products impact environmental matters, according to our third-party verified Environmental Product Declarations, the Global warming potential (GWP) of a washbasin faucet's operational water use is significantly higher than the combined GWP of the raw material supply, upstream transportation, and manufacturing for the same faucet. Therefore, including water and energy saving features in our faucets and showers can be an impactful way to reduce the lifecycle emissions of our products. This water and energy saving potential is relevant to all our customer groups and main markets, enabling more affordable water utility costs, lower water usage, and lower emissions from the heating and production of tap water. These water and energy saving features may be growing in importance as our main markets mitigate and adapt to climate change related effects, such as water scarcity and drought. Products and services with functionalities for enhanced hygiene and usability can support especially the health and care sector and at times when hand hygiene is of heightened importance for all customer categories. Furthermore, in terms of social responsibility our faucets and

showers have several safety features for anti-scalding, emphasising end-user safety.

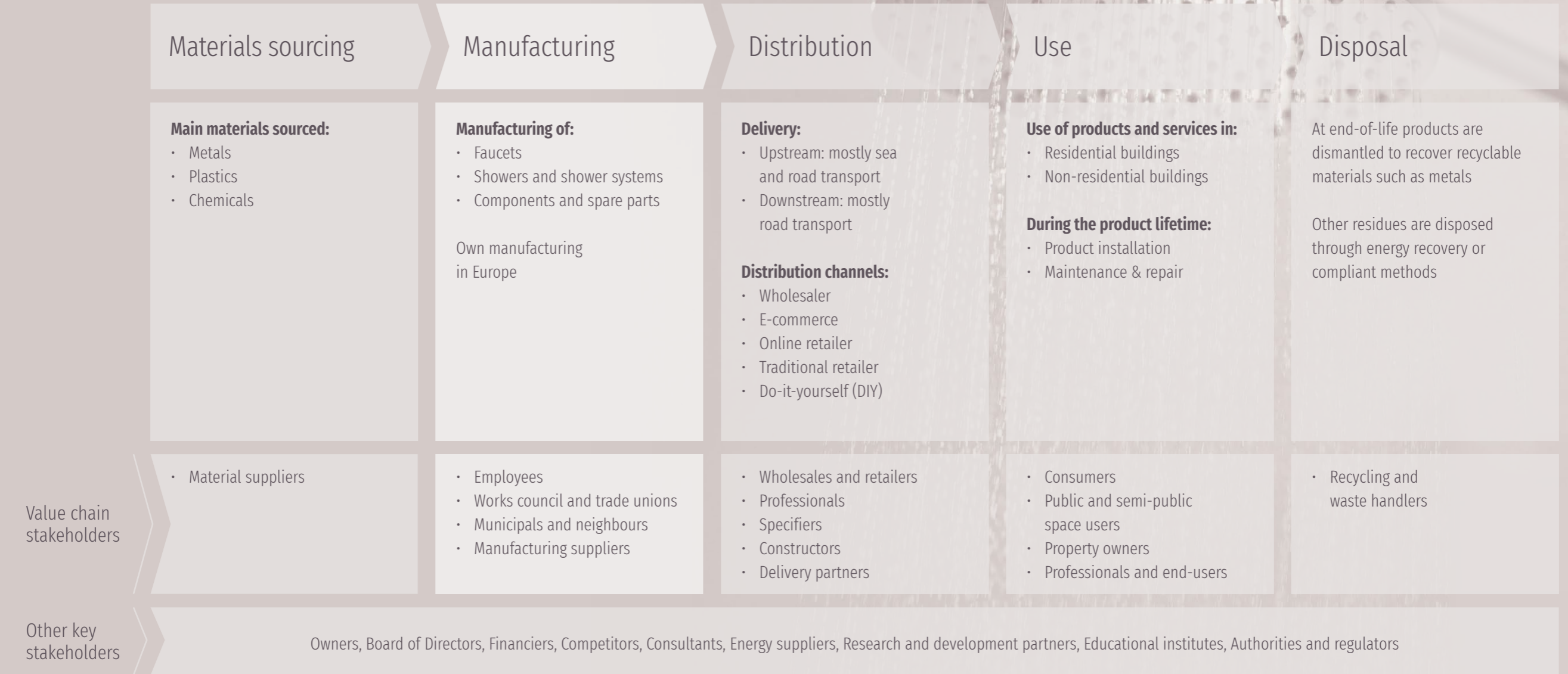
Important upcoming sustainability-related developments include the execution of the company's sustainability program and its three streams: a sustainable supply chain, sustainable products and services, and a responsible workplace. Preparing for any new sustainability-related regulations in the company's main markets is critical. Recent examples of such efforts include, for example, the Carbon Border Adjustment Mechanism (CBAM) and the EU Taxonomy regulations. Upcoming regulations to prepare for include the Drinking Water Directive, a directive on Empowering Consumers for the Green Transition, and possible indirect implications of the Corporate Due Diligence Directive, all in the European Union. Oras Group is also investigating setting science-based emissions targets for the future.

## Interests and views of stakeholders

Oras Group's stakeholder engagement and its focus is based on the company's strategy. Most significant stakeholder groups are internal stakeholders, customers, and suppliers. Engagement with different customer groups is frequent through direct sales activities and marketing communications. Surveys are used to engage with different professional and consumer audiences. The purpose of customer and consumer engagement is to increase our understanding of market expectations, developments, and the perceived performance of Oras Group in the surveyed markets. Survey results are used to develop our competences, offering, and innovations to better meet market expectations. For example, increasing consumer influence on purchasing decisions has contributed to our expansion into new sales channels.

In supplier engagement, Oras Group has several regular points of contact. Gathering and sharing information with suppliers improves co-operation, helping ensure business continuity and anticipate and mitigate risks. The quality, delivery performance, risk likelihood, financial aspects, and cost levels of our suppliers are regularly monitored and evaluated. We regularly conduct supplier audits and all direct suppliers are required to approve Oras Group's Supplier

# Oras Group value chain and key stakeholders



Code of Conduct, which stipulates clear requirement to adhere to laws and regulations, practise ethical business conduct, respect human rights, and address matters related to social and environmental responsibility. In 2025, we plan to expand our supplier-related sustainability engagement by implementing more sustainability-related questions in our supplier self-assessment questionnaire to increase transparency. In 2024, our supplier sustainability focus areas were defined based on country and commodity-level risk evaluations, which will also be reflected in the self-assessment questionnaire.

Oras Group’s Whistleblowing channel is available to all our suppliers to report any violations or misconduct of the Supplier Code of Conduct. If a supplier fails to correct non-compliance, Oras Group is entitled to terminate the co-operation.

All stakeholders’ insights are considered carefully, and they impact both operational and strategic levels. Regarding the other stakeholders described in the value chain infographic, the company regularly interacts and engages with educational institutions, local authorities, and various commercial organisations. The business environment is discussed and changing needs assessed from the viewpoint of both parties, with the aim of mutual benefits and productive local co-operation. The interests and views of stakeholders were included in the company’s double materiality assessment process process in 2024 via a stakeholder survey. The survey results influenced the evaluation of our material ESG topics. The survey was sent to multiple different types of stakeholders.

As a family-owned company, we find it important to take a long-term view when developing our business. This also applies to people. Oras Group has a long history of active dialogue with its employees, as well as several examples of initiatives that support long tenures and employee wellbeing. To further expand our understanding of our own workforce’s views on ESG matters, own workforce representatives were included in the stakeholder survey as part of the company’s double materiality assessment. Developing and maintaining world-class competence in our own workforce is essential to fulfilling our mission of delivering the smartest and most sustainable water

experiences for everyone. Building capabilities and a strong company culture is identified as one of our key must-win-battles in executing our strategy and it is part of our business planning. Our values were developed together with our employees, and they are displayed in several people-related topics, such as equal opportunities, fairness in pay, and openness in communication. We are committed to human rights, which are also a key part of Oras Group’s Code of Conduct. Read more on employee engagement in the [Own workforce](#) chapter.

### Material impacts, risks and opportunities and their interaction with strategy and business model

In 2024, Oras Group conducted a double materiality assessment to identify the company’s sustainability-related impacts, risks, and opportunities (IROs). The result of the material IROs are shown in the table on this page. The table features topic and sub-topic level results of the assessment, as well as identified IROs. The expected time horizon for impacts, risks and, opportunities have not yet been reported. This 2024 report only includes the topics of Climate change, Own workforce, and Business conduct as a start and will allow us to further build on the content in the future.

Related to climate change adaptation, material risks are identified in adapting to increasing regulations and other transitional events related to climate change, such as unpredictable politics and taxation. Regarding climate change mitigation, the company has material negative impacts due to greenhouse gas (GHG) emissions from its operations. Energy use is assessed to have a negative impact because it generates GHG emissions. Energy-related risks may also arise from energy costs.

Regarding the Own workforce topic, material IROs are identified in the sub-topic of working conditions. Here, negative impacts are potential and related to health and safety in the unlikely case of an irreparable serious negative impact on our own workforce. Identified material risks are related to work stoppages or strikes. In turn, opportunities are seen in work-life balance, social dialogue and freedom of association, as high employee engagement

### Material sustainability-related impacts, risks and opportunities

Sustainability theme	Topic	Material sub-topics	Material impacts		
			Actual (A)/Potential (P) Positive (+)/Negative (-)	Material risks	Material opportunities
Environment	E1 Climate change	Climate change adaptation		✓	
		Climate change mitigation	A -		
		Energy	A -	✓	
	E2 Pollution	Substances of very high concern	P -	✓	
	E3 Water and marine resources	<i>Not material</i>			
E4 Biodiversity and ecosystems	<i>Not material</i>				
E5 Resource use and circular economy	Resource use and circular economy	Resource inflows, including resource use		✓	✓
		Resource outflows related to products and services	A +		✓
		Waste	A -		
Social	S1 Own workforce	Working conditions	P -	✓	✓
		Equal treatment and opportunities for all	P -		✓
	S2 Workers in the value chain	<i>Not material</i>			
	S3 Affected communities	<i>Not material</i>			
S4 Consumers and end-users	Personal safety of consumers and/or end-users	A +			
Governance	G1 Business conduct	Corporate culture			✓
		Protection of whistle-blowers	P -		

Oras Group double materiality assessment (DMA) was conducted in 2024. It was presented to the Group Management Team on 12.6.2024 and the Board of Directors on 24.9.2024. The DMA process and result is not assured. Oras Group may make changes to the material topics during 2025.

and good social responsibility practices are valuable for both employees and the company. In the sub-topic of equal treatment and opportunities for all, potential negative impact is identified in the unlikely case of irreparable impact caused by violence or harassment in the workplace. Material opportunities are identified in training and skill development, gender equality, and diversity.

Business conduct material topics include corporate culture, which presents opportunities for the company, and the protection of whistleblowers, addressing the unlikely event of potential irreparable negative effect on people if such cases were to arise.

The identified material IROs are relevant to the Oras Group’s strategy and business model due to the nature of the manufacturing industry, which is dependent on using energy and an own workforce, as well as the rise of sustainability-related regulation in our main markets.

The anticipated effects of the material IROs and responses to them are part of the Oras Group enterprise risk management (ERM) process. They are also addressed by the company’s sustainability work and targets. In 2024, we completed the first round of

integrating the DMA-identified risks and opportunities into the company's ERM process. The process is described in the Oras Group Risk Management Policy and featured briefly on [page 11](#). The foundation of our sustainability work is our commitment to the UN Sustainable Development Goals, with the following key targets: clean water and sanitation, decent work and economic growth, responsible consumption and production, and climate action. This commitment, alongside our owner's vision for sustainable value creation, allows us to effectively work on our sustainability-related impacts, risks, and opportunities. Additionally, Oras Group has previously participated in the EcoVadis survey in 2021 and 2023, and is planning to do so again in 2025. The EcoVadis rating platform helps companies by assessing their ESG performance and guides them on improvements in sustainability matters. We actively utilise the platform's feedback in our sustainability development work. More detailed actions on our material IROs are described in the topical sections of this report.

## Impact, risk and opportunity management

### Description of the process to identify and assess material impacts, risks and opportunities

The process and methodology of the double materiality assessment were designed using the ESRS 1 standard and the EFRAG double materiality guidance draft version, dated November 15, 2023. The assessment included all topics, sub-topics and sub-sub-topics listed in ESRS 1. The process included both the company's own operations and its value chain across all relevant geographies. Key stakeholders were also included via a survey. Data sources for the assessment included, for example, assessment of company documents, interviews of personnel and management, assessment of relevant external sources, project workshops, and the stakeholder survey.

The assessment process was divided into four main phases. Phase one consisted of analysing sustainability-related impacts, risks and,

opportunities. In phase two, the identified IROs were scored to define a draft version of the material topics. In phase three, a stakeholder survey was conducted, and the results were used to adjust the initial scoring. In phase four, the draft materiality list was validated and readjusted to finalise the list of material IROs. The double materiality assessment result was then presented to the Group Management Team in June, and the Board of Directors in September.

In assessing negative impacts, the scoring factors used were scale, scope, remediability, and (in potential negative impacts) also likelihood. In turn, the scoring factors used to assess positive impacts were scale, scope, and (in potential positive impacts) also likelihood. In assessing the financial materiality of risks and opportunities, the scoring factors used were likelihood and magnitude. Each scoring factor was allocated a point scale system to determine a numerical score for each identified impact, risk, and opportunity. The threshold for materiality was set at 80% of the points scale system's maximum score per factor. Additionally, a topic may have been raised as material if the negative impact was assessed potentially irreparable, even though the scoring threshold was not met. In the 2024 assessment, the magnitude factor was a qualitative one. As we continue to develop the process in 2025, we plan to change the magnitude factor to a quantitative one and align it with our enterprise risk management thresholds. This development might affect the material topics in the future.

In the assessment of financial materiality the connections of its impacts and dependencies to risks and opportunities were included. For example, due to the nature of the manufacturing industry we are dependent on our own workforce to create outputs. This is reflected in the risks and opportunities raised as material in the topic of Own workforce. The prioritisation of sustainability-related risks relative to other types of risks was done as we completed the first round of integrating the DMA-identified risks and opportunities into the company's ERM. The material information disclosed about impacts, risks, and opportunities was determined by assessing the relevancy of disclosure requirements and data points in the topical standards where materiality was identified. A list of the disclosure

requirements included in this report can be found from the report's ESRS content index section on [page 25](#).

Consideration of climate-related impacts, risks, and opportunities was part of the double materiality assessment. In assessing climate impacts, the company's current green-house-gas emissions (GHG emissions) were taken into account, as well as the potential development of those emissions considering the current strategy and business model. A relatively large portion of the company's emissions arise from the value chain rather than its own operations. It is likely that these Scope 3 emissions are more difficult for the company to directly influence than emissions in Scopes 1 and 2. However, our own operations still emit some GHGs, primarily from heating at our manufacturing site in Finland and energy use at our manufacturing site in Poland. Therefore, the topics of GHG emissions and energy use in our own operations were raised as material actual negative impacts.

Oras Group did not identify material climate-related physical risks in its double materiality assessment. Material climate-related transition risks were identified in climate change adaptation and energy. When assessing physical and transition risks, we considered examples of such effects and their connection or relevance to the company over the short, medium, and long term. Oras Group has not yet conducted a climate-related scenario analysis.

# Environmental information

## ESRS E1

# Climate change

Oras Group is committed to environmental stewardship and sustainability. Climate actions are an integral part of our sustainability work and align with our strategy and sustainability program.

## Material impacts, risks and opportunities and their interaction with strategy and business model

In the double materiality assessment Oras Group conducted in 2024, the topical standard for Climate change was determined to be material in the sub-topics of climate change adaptation, climate change mitigation, and energy. Impacts were identified as actual negative effects on GHG emissions arising from the company's carbon footprint. Additionally, material negative impacts were assessed in the company's energy consumption, as fossil-free or renewable energy is not yet fully utilised in own operations. Material risks were identified in climate change adaptation, including transitional risks such as financial implications from increasing climate regulation, unpredictable climate politics, climate change-driven geopolitics or taxation. Another identified material risk was the cost of renewable energy, which is linked to the sub-sub-topic of energy consumption within the organisation. Climate matters' relation to strategy and business model are further described in the chapter General disclosures in sub-chapters Strategy and Business model and value chain and in the next pages.

## Impact, risk and opportunity management

### Policies related to climate change mitigation and adaptation

Oras Group's Code of Conduct outlines the ethical principles that guide our operations. It includes a commitment to environmental stewardship and sustainability, emphasising efforts to minimise environmental harm. The company's objectives and commitments to the environment and climate are further detailed in a separate environmental policy, which was updated in 2024. Additionally, our Supplier Code of Conduct takes environmental aspects into account. It will be updated in 2025 to align with the renewed environmental policy. Together with the company's authorisation and risk management policies, these documents form the foundation for managing environmental and climate impacts, risks and opportunities.

The updated environmental policy serves as a guideline for ensuring sustainable operations and engaging with value chain partners and stakeholders (such as customers, employees and suppliers) on climate and environmental actions. The policy outlines commitments related to several climate, environment and energy matters. It takes climate change mitigation, adaptation and energy efficiency into account, including reducing greenhouse gas emissions, promoting energy and



material efficiency, responsible use of chemicals, sustainable use of water, implementing circular economy practices, providing relevant data to customers and continuously improving our management system.

The environmental policy applies to all Oras Group operations and premises, as well as to engagement with value chain partners on these matters. Key stakeholders related to environmental matters, such as suppliers and customers, were considered when updating the policy. For example, supporting supply chain GHG reductions is among the policy commitments. This may involve providing information about our environmental practices through reports and guiding suppliers in this work via the Supplier Code of Conduct. The environmental policy is approved by the Group Management Team, with implementation overseen by the COO’s organisation. The policy document is available on the company intranet for internal stakeholders. The environmental policy includes Oras Group’s commitment to the UN Sustainable Development Goals.

### Actions and resources in relation to climate change policies

Taking action on climate-related policies is an integral part of our sustainability work and aligns with our strategy and sustainability program. Key actions related to climate change mitigation and adaptation during the reporting year 2024 included further establishing the management and governance of our sustainability program, initially launched in 2023, as well as the execution of the program.

A new role of Sustainability Manager was created in early 2024 to lead the company’s sustainability actions. During the reporting year, the company focused on improving its greenhouse gas (GHG) accounting process. A screening of the Scope 3 categories was completed, adding categories 9: downstream transportation and distribution, and 12: end-of-life treatment of sold products, into the Scope 3 inventory. This improved the accuracy of the company’s GHG accounting. Efforts to further enhance our GHG accounting accuracy are ongoing, including requesting supplier-specific emissions factors. Another significant action was the update of the company’s environmental policy. Oras Group re-audited its ISO management system certificates in 2024, including ISO 14001 for environmental management. The ISO

14001 certificate covers all our own manufacturing sites, as well as our headquarters in Finland and our office in Stuttgart.

A sustainable supply chain is another key aspect of our climate- and environment-related sustainability work. Notable actions in 2024 included reducing GHG emissions at our manufacturing plant in Finland by purchasing fossil-free guarantees of origin for the plant’s electricity consumption. The impact of this action was 5,200 tCO<sub>2</sub>e less greenhouse gas emissions. Furthermore, we implemented supply chain footprint changes in 2024, which are expected to significantly improve the efficiency of transportation routes and reduce transportation-induced greenhouse gas emissions in the coming years. We also invested in new, more energy-efficient production machinery at our manufacturing facilities in Finland and Poland.

### Metrics and targets

Oras Group’s sustainability program includes targets related to climate change mitigation and adaptation. The program’s sustainable supply chain stream has the following targets set for 2030:

- Increasing green electricity use in internal operations
- Reduction in internal transportation and packaging materials
- Supply chain compliance with our sustainability requirements.

All these targets align with objectives outlined in the company’s environmental policy. Increasing the use of green or fossil-free electricity in internal operations effectively reduces the company’s Scope 2 GHG emissions. The main milestones for this target are acquiring such electricity for our own manufacturing sites. Reducing internal transportation is expected to lower transportation-related GHG emissions within Scope 3 upstream transportation and distribution. The main milestones for this action are the footprint changes taking place in 2024 and 2025, including optimising logistics and relocating operations in the Czech Republic to Finland and Poland. The target of achieving supply chain compliance with our sustainability requirements supports our efforts to engage the supply chain on climate matters. Together, these targets contribute to reducing the company’s negative

### Energy intensity per net revenue

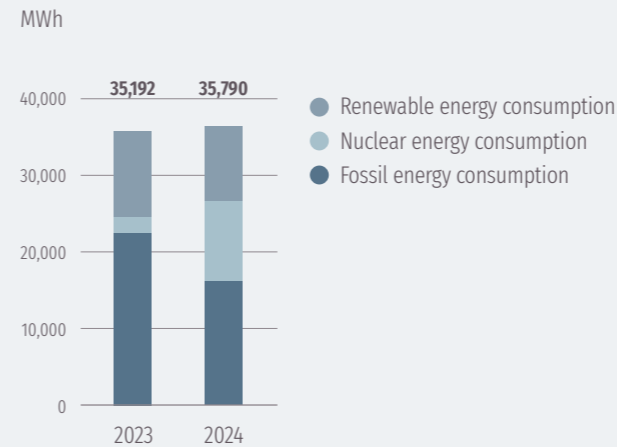
	2023	2024	Change -%
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/€ million)	186	179	-4%

### Energy consumption and mix

	2023	2024
(1) Fuel consumption from coal and coal products (MWh)	-	-
(2) Fuel consumption from crude oil and petroleum products (MWh)	2,937	3,605
(3) Fuel consumption from natural gas (MWh)	-	-
(4) Fuel consumption from other fossil sources (MWh)	-	-
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	19,267	12,435
<b>(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)</b>	<b>22,204</b>	<b>16,041</b>
<b>Share of fossil sources in total energy consumption (%)</b>	<b>63%</b>	<b>45%</b>
<b>(7) Consumption from nuclear sources (MWh)</b>	<b>2,017</b>	<b>10,200</b>
<b>Share of consumption from nuclear sources in total energy consumption (%)</b>	<b>6%</b>	<b>28%</b>
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	-	-
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	10,971	9,549
(10) The consumption of self-generated non-fuel renewable energy (MWh)	-	-
<b>(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)</b>	<b>10,971</b>	<b>9,549</b>
<b>Share of renewable sources in total energy consumption (%)</b>	<b>31%</b>	<b>27%</b>
<b>Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)</b>	<b>35,192</b>	<b>35,790</b>

Energy source split for 2023 was used in case the 2024 split was not available (Rauma heating and Olesno electricity). Not all company car fuel use is included due to data availability.

### Energy consumption and mix



impact on the climate, which was assessed as material in the topics of GHG emissions and Energy. Proactively improving the company's GHG accounting and implementing climate mitigation and adaptation actions may help reduce risks associated with the transitional effects of climate change. Setting science-based GHG emissions reduction targets for the future is currently under consideration.

In the reporting year the carbon footprint increased by 4% compared to 2023 (market-based). The reasons behind this change were, for example, in the improvements of data accuracy and availability in several emissions categories, especially in company cars (Scope 1) and business travel (Scope 3). Emissions increased also in purchased goods and services (Scope 3) from an increase in the amounts purchased but also from expanding the data in that category. Emissions increase in upstream transportation and distribution (Scope 3) was caused both by calculation methodology changes by our transportation partners but also from increased transportation. Despite the emissions reductions from guarantees of origin on our manufacturing plant in Finland, our energy consumption increased in Poland, which also affects the results. Information on Oras Group's metrics related to energy consumption, energy mix, and energy intensity based on net revenue can be found in the tables on [page 17](#). The metric information of the company's GHG emissions are available in the table Gross Scopes 1, 2, 3 and Total GHG emissions on this page. Information of GHG intensity per net revenue is also on this page.

### GHG intensity per net revenue

	2023	2024	% 2024/2023
Total GHG emissions (location-based) per net revenue (tCO <sub>2</sub> eq/€ million)	242	259	7%
Total GHG emissions (market-based) per net revenue (tCO <sub>2</sub> eq/€ million)	259	256	-1%

### Gross Scopes 1, 2, 3 and Total GHG emissions

	Retrospective			
	2020	2023	2024	% 2024/2023
<b>Scope 1 GHG emissions</b>				
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	1,701	1,449	2,094	45%
<b>Scope 2 GHG emissions</b>				
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	10,593	7,920	7,740	-2%
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	11,256	11,258	7,089	-37%
<b>Significant Scope 3 GHG emissions</b>				
<b>Total Gross indirect (Scope 3) GHG emissions (tCO<sub>2</sub>eq)</b>	<b>43,823</b>	<b>36,468</b>	<b>41,970</b>	<b>15%</b>
1 Purchased goods and services	33,771	26,068	31,778	22%
2 Capital goods	4,113	2,460	1,558	-37%
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	2,584	2,612	2,779	6%
4 Upstream transportation and distribution	1,696	1,221	1,648	35%
5 Waste generated in operations	79	192	139	-28%
6 Business traveling	204	270	882	227%
7 Employee commuting	1,043	1,191	1,099	-8%
8 Upstream leased assets		1,550	1,044	-33%
9 Downstream transportation		13	13	6%
11 Use of sold products	334	163	197	21%
12 End-of-life treatment of sold products		730	833	14%
<b>Total GHG emissions</b>				
Total GHG emissions (location-based) (tCO <sub>2</sub> eq)	56,117	45,837	51,805	13%
Total GHG emissions (market-based) (tCO <sub>2</sub> eq)	56,780	49,175	51,153	4%

The years reported are not fully comparable due to improvements in calculation data.

# Social information

## ESRS S1

# Own workforce

As a family-owned company, we find it important to take a long-term view when developing our business. This also applies to people. Developing and maintaining world-class competence in our own workforce is essential to fulfilling our mission of delivering the Smartest and Most Sustainable Water Experiences for Everyone.

## Material impacts, risks and opportunities and their interaction with strategy and business model

Oras Group's own employees can be divided into two major groups: White-collar employees and blue-collar workers. There are also some non-employees that work on our premises, such as cleaning or maintenance personnel employed by other companies. The double materiality assessment conducted in 2024 included all people in the company's own workforce. Related to Own workforce material impacts risks and opportunities (IROs) were identified in the sub-topics working conditions and equal treatment and opportunities for all.

Arising from the nature of the company's manufacturing operations and use of chemicals, material potential negative impacts in health and safety were assessed in the unlikely case of irremediable serious negative impacts on our own workforce. Material potential negative impact was also identified in the sub-topic measures against violence and harassment in the workplace in the unlikely case of irremediable serious negative impacts on our own workforce that may arise in working environments where diverse groups of people work together. Overall, such negative impacts are connected to the nature of the business and may be impossible to fully mitigate. Given the potential for irremediability in both disclosed negative impacts, they were raised as material.

The material potential negative impact in health and safety is largely connected to employees working in the company's manufacturing operations. Other IROs can be considered relevant in the context of the entire own workforce. The company processes chemicals at various points of the manufacturing process. Some of these chemicals are substances of very high concern (SVHC) and accidents involving them may potentially cause irreversible harm. Blue-collar employees working with dangerous chemicals are at the highest risk of severe accidents at Oras Group. Furthermore, assembly workers are prone to musculoskeletal disorders due to the monotonous nature of the work. This potential negative impact is mitigated through regular workplace risk assessments and actions to minimise identified risks. In addition, workplace risks are considered in investment decisions. For example, the company has recently made major investments in production lines where the health and safety of our employees have been a major driver in decision-making.

The identified material risk is related to the sub-topic of collective bargaining, including the rate of workers covered by collective agreements. The risk is associated with work stoppages that could pose financial risks to the company. Collective bargaining coverage is high in Finland, which contributes to the materiality of this risk, as does the dependency on the company's own workforce in manufacturing.

Material opportunities were identified in the sub-topics social dialogue, freedom of association, training and skills development, gender equality and equal pay, as well as diversity.

These opportunities are related to our ability to attract and retain a skilled workforce, creating a positive company culture and offering a workplace with open dialogue and fair, equal treatment for everyone. In social dialogue and freedom of association, high employee engagement and good social responsibility practices benefit both employees and the company and can also mitigate possible risks. The materiality of training and development relates to our highly skilled staff being a source of increased innovation and efficiency. Equal opportunities, equal pay, and diversity can provide opportunity through strengthening our company culture, helping us attract diverse talent, serve diverse customers, and improve decision-making. These opportunities are related to the company's reliance on highly skilled employees, where good employee engagement and a strong company culture can nurture a positive working environment and support our own workforce's eagerness to pursue opportunities.

## Impact, risk and opportunity management

### Policies related to own workforce

In terms of adopted policies related to our own workforce, the Oras Group's Code of Conduct ("Code") forms the backbone of how we do business. It sheds light on our core values, connecting them to everyday decisions and ensuring we always operate with the highest standards of business conduct. The Code provides guidance on addressing misconduct and speaking up and is essential for realising our material opportunities related to a healthy working culture, equality, and diversity. All employees complete a mandatory Code of Conduct training course annually. Accountability for the Code lies with the Chief Human Resources Officer (CHRO) and the document is available to all internal and external stakeholders on the company's website. Read more on the Code in the chapter [Business conduct](#).

Another policy connected to our own workforce are our personnel guidelines, which detail the principles guiding people processes and practices at Oras Group. The policy specifically outlines how the

company values come to life in people development, recruitment, rewards, and communication. There is also a pay guideline designed to ensure fair and equal treatment of all employees, which is also connected to the material opportunity of equal pay. These rules clarify the salaried employees' pay structure and unify the salary-setting and review processes within Oras Group. The openness and transparency of pay structures is a key enabler of fair and equal compensation. Our whistleblowing policy details how suspected unethical behaviour or misconduct can be reported, how the Oras Group Whistleblowing channel is managed, and how the related investigation process is carried out. The CHRO is accountable for the implementation of the personnel and pay guidelines, as well as the whistleblowing policy. These documents are available to employees in our internal document management system and included in our People Handbook. They are reviewed and approved yearly by the CHRO. All Oras Group employees fall within the scope of these policies. Read more about our whistleblowing policy and process in the chapter [Business conduct](#).

Additionally, the HR Minimum requirement document states the minimum requirements (not the ambition) for labour conditions. It sets expectations on employment conditions (contract, working hours, wages, leaves, disciplinary processes) and basic employee rights (forced labour, migrant employees, freedom of association etc.). The scope of this document covers all employees directly employed by Oras Group and those employed by entities where Oras Group is the majority owner. It does not cover contractors or supplier employees. The guideline is managed by the CHRO, with all amendments approved by the CEO. Monitoring of the HR Minimum requirement is through bi-yearly sign-off by key leaders.

In 2024, we updated our occupational health and safety (OHS) policy. The policy lays out our commitments and objective on OHS. It includes several commitments to OHS, such as a zero-accident target, safety training, risk evaluation, early intervention, recording safety observations, raising awareness, and increasing wellbeing and ergonomics. Oras Group considers both physical and mental wellbeing to be important aspects of OHS. The policy covers all company employees and falls under the accountability of the COO.

The document is made available on the company intranet for internal stakeholders. Ensuring a safe workplace is an integral part of everything we do. Oras Group has a third-party-audited safety management system in place, aligned with the ISO 45001 Occupational health and safety management standard. The ISO 45001 management system certificate was renewed in 2024 and covers Oras Group's own manufacturing sites, headquarters and the company's Stuttgart office.

At Oras Group, we engage with our employees in several ways. At a local level, regular co-operation procedures involve continuous dialogue between employers and employees' representatives, as well as negotiations during changing circumstances. These procedures vary between countries, but they all aim to promote mutual respect for rights, obligations, and interests in the workplace, to continuously develop company operations and the workplace community, and to improve operational results and wellbeing at work. Performance and development discussions are conducted twice a year for white-collar employees and once a year for blue-collar employees. The purpose of these discussions is to set targets, manage performance through feedback, and agree on development actions. Furthermore, these discussions include a dialogue about wellbeing and the resources needed to meet job demands. Leaders meet quarterly to strengthen our leadership culture and learn about the way we lead people at Oras Group. Read more on our engagement processes in the sub-chapter [Processes for engaging with own workforce](#).

Oras Group conducts business in a manner that respects human rights and dignity, supporting international efforts to protect them. We are in absolute opposition to slavery, human trafficking, forced labour and child labour. Our employees are encouraged to report any human rights-related issues, whether they involve our own staff, customers, or suppliers. Moreover, we are committed to the fair and equal treatment of all our employees. No person shall be discriminated against in employment matters based on ethnicity, national or social origin, caste, birth, religion, disability, gender, sexual orientation, marital status, family responsibilities, union membership, political affiliation, age, or any other characteristic that could lead to

discrimination. These commitments are communicated in our Code of Conduct, personnel guidelines and HR Minimum requirements.

### Processes for engaging with own workforce

We use several processes and channels to engage with our own workforce and workers' representatives about impacts. One main tool is the employee engagement survey, which is sent to all employees annually. Employees evaluate several aspects of the work environment that impact engagement: relationships with managers and colleagues, meaningfulness and engagement at work, clarity of targets, health and wellbeing, workload, development, independence, tools and equipment, feedback culture, as well as the overall strategy and working culture. All survey feedback is reviewed by managers and HR. Overall results are discussed with employee representatives without disclosing individual responses. The response rate can be followed on a team level, as well as the share of open questions and comments. Monitoring the number and main themes of planned actions is part of the process for assessing their effectiveness. Other engagement processes include the Oras Group European Forum, company-wide management presentations on strategy, financials and important developments (with Q&As), as well as direct engagement with managers. The Group European Forum is an annual meeting for the employee representatives of our biggest countries. Its aim is to improve communication and mutual understanding between group management and personnel. The company follows people-related metrics to assess engagement effectiveness and identify development needs. The CHRO and the management team are responsible for ensuring engagement, and all results are taken into consideration.

Oras Group also has processes for engaging our own workforce on health and safety matters. These engagement practices may vary by country of operation, but they always follow the company's Code of Conduct, relevant policies, and applicable laws and regulations. Health- and safety- related engagement in manufacturing operations includes safety moments, reporting safety observations, lean audits, risk evaluations, and safety walks. Additionally, relevant training for all current and new employees is organised periodically. They can include

general safety trainings that are mandatory for everyone, or more specified sessions, such as chemical safety trainings. Engagement can occur directly with our own workforce or with workers’ representatives. Health and safety matters are of high importance to the company, with engagement taking place continuously through activities that may occur daily, weekly, monthly, yearly, or less frequently. Our Group Management team holds overall responsibility for the company’s overall management system including the OHS management system requirements. The company uses various metrics to assess the effectiveness of engagement related to health and safety. Such metrics include the accident frequency rate, sick leave rate, and SAF index, which tracks the occurrence of difference safety engagement activities at manufacturing sites.

### Processes to remediate negative impacts and channels for own workforce to raise concerns

In terms of processes for our own workforce to raise concerns, all employees, directors, and partners acting on behalf of Oras Group are obligated to raise concern without delay if they become aware of a potential or suspected misconduct or violation of Oras Group’s Code of Conduct. Read more on our Whistleblowing channel and related processes in the chapter [Business conduct](#). Additionally, employees can report workplace-related issues anonymously in the employee engagement survey. Remedy for workplace-related issues involves ensuring that the person can continue working without concern about further incidents and providing rehabilitation if needed. Disciplinary processes are defined and followed when necessary.

### Taking action on material impacts, managing materials risks and pursuing material opportunities related to own workforce

The 2024 materiality assessment identified two potential negative impacts on our own workforce: violence and harassment in the workplace, and health and safety. Significant action has been taken to prevent both. The workforce receives annual training on harassment, workplace violence, and inclusion as part of the code of conduct training, with an emphasis on increasing understanding and reporting issues.

All reported violence and harassment cases are investigated with a high priority and disciplinary measures are taken without delay, if necessary.

Health and safety actions have been executed according to established health and safety processes and site-level plans. Annual safety trainings have been conducted, and the occupational health and safety management system was re-audited in 2024 to ensure compliance with the ISO 45001 standard. Workplace risk assessment is a continuous process aimed at preventing work-related risks, such as those associated with working with hazardous chemicals.

Actions to pursue opportunities related to working conditions include a hybrid working model for employees whose roles are not tied to a specific workplace. The company also offers a well-being program with various local benefits, such as an on-site or support for mental health issues. Frequent dialogue with employee representatives at both local and European levels encourages communication and positively impacts staff engagement. Finally, the Nordic leadership culture, characterised by high trust and a flat hierarchy, supports employees in diverse life situations.

Equal treatment of all employees is high on Oras Group’s agenda. Our workforce structure has a good balance of men and women. However, the representation of women decreases at higher levels of the organization. Hence, we have set a target to achieve a minimum of 30% representation of women in higher job levels by 2030. Our focus will be, for example, in increasing the share of women among interview candidates.

Oras Group conducted an extensive analysis on pay equality during 2024. The purpose was to understand the current pay gap in more detail and to agree on measures that ensure pay equality in the future. Gap remediation and process improvement measures (such as hiring and promotions) will be implemented during 2025. Further, Oras Group has a highly skilled workforce and continuously puts effort into staff education. Most needs are addressed via individual development planning, but also through wider initiatives. During 2024 the company, for example, initiated lean management and leadership trainings in both of our factories, upgraded onboarding practices, and trained new skills related to plastic material usage. These measures are part of our people

agenda or local management agenda and are utilised in business planning processes.

## Metrics and targets

Oras Group’s sustainability program includes a stream for a responsible workplace with time-bound targets to 2030 related to our own workforce. The targets are as follows:

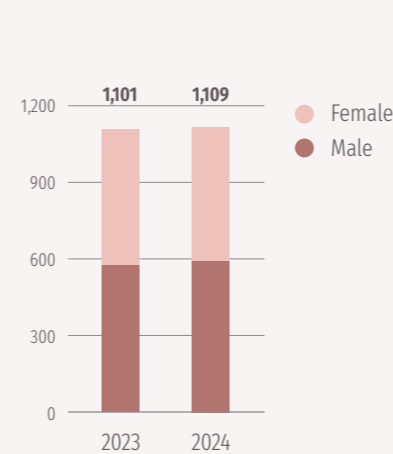
- All of our employees have a personal development discussion every year
- At least 30% share of women in management positions
- Reduction in our total absenteeism rate.

### Employee head count by gender

Gender	Number of employees	
	2023	2024
Male	575	589
Female	526	520
<b>Total employees</b>	<b>1,101</b>	<b>1,109</b>

Head count figure is at the end of the reporting period. Gender categorised as “other” is not applicable.

### Employee head count by gender



The baseline year for these targets is 2023, the year our sustainability program was established. The targets were set during the program’s creation. Baseline data for personal development discussions has not been available but will be developed through the implementation of a new HR system in 2025. Share of women in management positions had a baseline of 26% in 2023, with the 2024 result at 23%. The target includes female representation at higher managerial levels. The 2024 absenteeism rate was 6,7% for blue-collars and 3,3% for white-collars. The 2023 absenteeism data is not reliable. We aim for a 30% reduction in the long term.

In addition to these targets, our safety target of zero accidents is significant for fostering a responsible workplace and supporting

### Employee head count in countries

Country	Number of employees	
	2023	2024
Finland	447	430
Germany	106	104
Poland	356	423

Including countries where the undertaking has at least 50 employees representing at least 10% of its total number of employees. Head count figure is at the end of the reporting period.

### Employees by contract type, broken down by gender

2024		
Female	Male	Total
<b>Number of employees (head count)</b>		
520	589	<b>1,109</b>
<b>Number of permanent employees (head count)</b>		
459	531	<b>990</b>
<b>Number of temporary employees (head count)</b>		
57	51	<b>108</b>
<b>Number of non-guaranteed hours employees (head count)</b>		
1	3	<b>4</b>

Head count figure is at the end of the reporting period. Oras Group has employees only in the EEA and Switzerland which has been included in this table. *Number of employees (head count)* includes 7 employees not visible in the rows below. Gender categorised as “other” is not applicable.

our own workforce. The 2023 baseline was 3.0 for lost time accident frequency. However, in 2024 there was negative development, with the result increasing to 5.6. We will continue efforts to reverse this negative trend in 2025.

We regularly inform employee representatives about the progress of these targets in various forums, both locally and at the annual Oras Group European Forum meeting. The actions driving toward the targets are managed within the sustainability program, with new improvements identified through yearly planning processes. All the above-mentioned targets are in line with the objectives of our Code of Conduct. The absenteeism and safety targets are aligned with the objectives of our OHS policy. The scope of all targets encompasses the entire Oras Group.

The targets for absenteeism and safety focus on reducing the company’s negative impact on its own workforce and addressing the material potential negative health and safety impacts identified in the double materiality assessment. Absenteeism is also linked to employee engagement, company culture and leadership. The target of all our employees having a development discussion annually is linked to the material opportunity arising from a skilled workforce. This target is also linked to positive impacts on employees through improved skillsets and learning opportunities. The target for female representation in management positions supports the material opportunity of gender equality and diversity, while also providing positive impacts for female employees, such as enhanced career opportunities.

**Methodologies and assumptions**

All reported figures include only employees who are in an employment relationship with the company, unless otherwise stated.

**Employee turnover by head count**

	2023	2024
Employees who left the company	126	127
Rate of employee turnover (%)	11.8	12.9

Head count figure is at the end of the reporting period.

**Gender distribution of top management**

Gender	Absolute	Percentage
Female	2	29%
Male	5	71%
<b>Total</b>	<b>7</b>	<b>100%</b>

These figures do not take into account the interim CMO in 2024.

**Collective bargaining coverage and social dialogue**

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees – EEA (Countries with > 50 empl. Representing >10% total empl.)	Employees – Non-EEA (Estimate for regions with > 50 empl. Representing >10% total empl.)	Workplace representation (EEA only) (for countries with >50 empl. Representing >10% total empl.)
0–19%	Poland		
20–39%			
40–59%			
60–79%			
80–100%	Finland, Germany		Finland, Germany, Poland

This data covers Oras Group’s three biggest countries in terms of employee head count: Finland, Germany and Poland with >50 employees. Oras Group has two trade unions represented in Poland. In Poland statutory negotiations take place in the areas regulated by national labor unions regulations, but there is no collective bargaining agreement.

**Health and safety metrics**

	2023	2024
Employees covered by health and safety management system (ISO 45001) (%)	91%	92%
Number of fatalities as a result of work-related injuries and work-related ill health	0	0
Work-related accidents	5	10
Rate of work-related accidents	3.0	5.6
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health	176	355
Absenteeism rate (%)		5.2%
Blue-collars		6.7%
White collars		3.3%

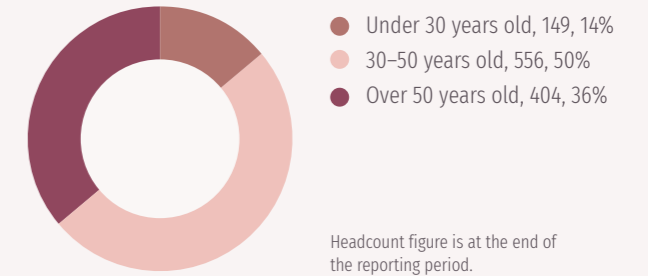
The figures do not include cases of work-related ill-health. Netherlands not included in absenteeism rate and Switzerland not included in the table. 2024 number of fatalities of other workers working on Oras Group sites: 0.

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

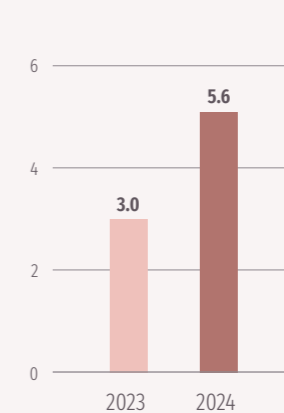
	2024
Total number of incidents of discrimination including harassment reported	1
Number of complaints filed through channels to raise concerns by own workforce (WhistleB)	2
Total amount of fines, penalties and comentsation for damages as a results of incidents and complaints	0

In 2024 severe cases of human rights impacts on own workfroce were not identified.

**Distribution of employees by age group**



**Rate of work-related accidents**



# Governance information

## ESRS G1

# Business conduct

Oras Group is committed to always upholding the highest standards of business conduct. Our Code of Conduct provides the company and its stakeholders with commonly accepted guidelines and perspectives for future decision-making with integrity and the highest standards of ethical conduct.

## Impact, risk and opportunity management

### Business conduct policies and corporate culture

Oras Group's Code of Conduct provides the company and its stakeholders with commonly accepted guidelines and perspectives for future decision-making with integrity and the highest standards of ethical conduct. The Code of Conduct outlines the company culture, accepted practices and commitment to complying with laws and regulations. The company values of Courage, Fairness, Effectiveness, and Openness are deeply ingrained in the Code.

The Code of Conduct ("Code") includes guidance for understanding its contents and the following themes: ensuring the best workplace, conducting business responsibly, complying with the law, protecting information and assets, and supporting the company's approach to building a better world. The Code applies to all permanent and temporary employees of Oras Group and its subsidiaries, including executives, corporate officers and members of the Board of Directors. Business partners serving as an extension of Oras Group are also expected to follow the spirit of the Code, as well as any applicable contractual provisions. The CHRO is accountable for the implementation of the Code. Management and internal functions participated in updating the Code in 2024. The document is publicly available [here](#).

Oras Group is committed to always upholding the highest standards of business conduct. We comply with the law wherever we operate, promote integrity by adhering to exemplary ethical principles, navigate complex workplace situations, seek help from people and policies when the right course of action is unclear, and avoid even the appearance of anything improper in connection with our business activities. Any violation of the company's Code, policies, or the law is instructed to be reported to the individual employee's manager. In cases of uncertainty in decisions or actions around legal aspects, employees are instructed to contact the CFO. If an individual is uncomfortable speaking with these persons, additional options are available: contacting another member of management, contacting human resources, or communicating through the company's Whistleblowing channel. The Whistleblowing channel is open to both internal and external stakeholders and is available on the company website and intranet.

As part of the updated Code of Conduct procedures in 2024, all company employees were invited to complete a course on the Code on the company's learning platform. At the end of the year, the completion rate for the course was 100%. A section covering reporting on concerns is included in the training material every year. Oras Group does not tolerate any kind of retaliation against employees who in good faith report conduct that may be inconsistent with the Code, company policies or the law, or who assist

in an investigation of suspected wrongdoing. Whistleblowers are further protected by the anonymous reporting functionality of the Whistleblowing channel, which is also communicated in the Code.

The Whistleblowing channel is operated by an independent third-party provider. All reported concerns are documented and forwarded to Oras Group for further investigation.

Reports submitted through the Whistleblowing channel are received by the CHRO, who assigns an investigation team and, if necessary, calls for a meeting with the company's Ethics Working Group, which includes the CHRO, CFO and CEO. If the report suggests misconduct by the CHRO or any other member of the Ethics Working Group, the respective member is excluded from the investigation for its duration. All reports received through the channel are handled confidentially and without delay. Details on how to report suspected unethical behaviour or misconduct, how the Oras Group Whistleblowing Channel is managed, and how the related investigation process is carried out are described in an internal Whistleblowing policy available on the company's intranet.



# ESRS content index

Content index for the European Sustainability Reporting Standards disclosure requirements used with reference.

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