



onlineprinters

Sustainability Statement

for fiscal 2025

Part of the Combined Management Report

OP HoldCo GmbH

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1. General Disclosures (ESRS 2)

1.1 Basis for preparation

1.1.1 General basis for preparation of the sustainability statements (BP-1)

This sustainability statement has been prepared on a consolidated basis and covers Onlineprinters Group (OP Group) and all its subsidiaries. The scope of consolidation is identical to that applied in the consolidated financial statements, in accordance with Article 29a of the CSRD and ESRS 1 requirements. The reporting period covers the financial year from 1 January 2025 to 31 December 2025. The sustainability statement has not been subject to external assurance.

As the Corporate Sustainability Reporting Directive (CSRD) had not yet been transposed into German law at the time the consolidated management report for the financial year ending 31 December 2025 was prepared, this non-financial statement has been prepared in accordance with §§ 315b and 315c in conjunction with §§ 289c to 289e of the German Commercial Code (HGB).

In accordance with § 289d HGB, OP Group has applied the European Sustainability Reporting Standards (ESRS), as adopted by Delegated Regulation (EU) 2023/2772, as a recognized reporting framework for the preparation of the non-financial statement. The use of ESRS ensures a structured and comprehensive presentation of non-financial information while fully meeting the legal requirements of the German Commercial Code as well as the corresponding provisions of DRS 20. The reporting obligations pursuant to § 289c(2) HGB are considered fulfilled through the reporting on the relevant ESRS topics included in this sustainability statement.

FY 2025 represents the first reporting year for Onlineprinters under non-financial disclosure requirements as well as ESRS 1. Consequently, no comparative figures are available.

No subsidiary undertakings included in the consolidation are exempt from sustainability reporting under Articles 19a(9) or 29a(8) of Directive 2013/34/EU. The sustainability statement includes information on material impacts, risks and opportunities (IROs) related to OP Group's own operations as well as its upstream and downstream value chain. The double materiality analysis was conducted across the entire value chain. Further information on the value chain is provided in the section *1.3.1 Strategy, business model and value chain (SBM-1)*.

For the reporting year 2025, OP Group has applied the transitional reliefs introduced by the CSRD Omnibus Quick-Fix Delegated Act. In line with these provisions, detailed disclosures under ESRS E3 have not been provided, although the topic was assessed as material. A summary of the materiality assessment and qualitative information is included in accordance with ESRS requirements.

OP Group has not applied any exemptions related to intellectual property, know-how, or results of innovation, nor has it used national law exemptions for omitting information on impending developments or matters under negotiation. All material information has been disclosed in accordance with the applicable legal requirements and the applied ESRS framework. OP Group plans to revise and update ESG targets and baseline values in 2026.

1.1.2 Disclosures in relation to specific circumstances (BP-2)

Time horizons

OP Group has used the time horizons defined in ESRS 1 for the information and content provided in this sustainability statement:

Short term: one to two years

Medium term: two to five years

Long term: more than five years

Estimates along the value chain

In connection with key figures that refer to data points from other EU legislation, value chain information was considered [ESRS 2, Annex B]. [ESRS 1, para. 10.2, §133b)], to calculate energy data, greenhouse gas emissions and key figures of circular economy datapoints, estimates were applied regarding quantitative information on the upstream and downstream value chain based on sector averages from public databases. Details on these estimates can be found in the following table and the corresponding chapters below. OP Group is continuously working to improve the quality of information on the value chain, for example by engaging more actively with suppliers in line with our reporting requirements such as reaching out to shipping suppliers and reinforcing expectations for compliance with reporting requirements and relevant standards to provide relevant data.

List of metrics including estimated upstream/downstream value chain data		
No.	Metric	Data estimated / source
1.	Scope 3 GHG Emissions (total)	Estimated using a mix of supplier specific, activity based and spend based data, including sector averages and proxy emission factors where supplier specific data was unavailable.
2.	Scope 3 – Purchased goods and services	Estimated using supplier specific data for paper where available, supplemented by activity-based and spend based data for other materials and services.
3.	Scope 3 – Upstream transportation and distribution	Estimated using a combination of activity based data (km travelled) and spend based proxies, with improvements in 2025 replacing prior spend based methods.
4.	Scope 3 – Capital goods	Estimated using spend based data for machinery, vehicles and equipment, applying industry average emission factors.
5.	Scope 3 – Processing of sold products	Estimated using spend based data, assessed for the first time in 2025 and considered marginal in total footprint.
6.	Scope 3 – End-of-life treatment of sold products	Estimated using activity based data and standard waste treatment emission factors.

Sources for estimates and external validation

FY 2025 represents the first reporting year for OP Group under the applicable non-financial disclosure requirements. Consequently, no comparative figures are available.



As this is a first-year report, a number of processes, methodologies and data collection systems are still under development and will be further refined in future reporting periods. Despite OP Group's ongoing efforts to improve data quality, estimates are applied in limited cases where data availability is constrained. This primarily relates to areas outside value chain-related information.

The methods applied, key assumptions made and the main sources of measurement uncertainty underlying these estimates are described in the respective metric-specific sections of this sustainability statement.

Information based on other legal provisions or generally accepted statements on sustainability reporting

In addition to the information required under the ESRS and Article 8 of Regulation (EU) 2020/852, no information derived from other sustainability-related legislation or generally accepted reporting standards has been included in this sustainability statement.

Recording information by means of references

In accordance with ESRS 2 BP-2.16.1, OP Group incorporates limited information in the sustainability statement by reference to other parts of the Annual Report and the consolidated management report. The referenced information forms an integral part of the CSRD reporting and addresses the respective ESRS disclosure requirements.

The following disclosures are incorporated by reference:

- EU Taxonomy disclosures (ESRS E1 / ESRS E5): Turnover, CapEx and OpEx KPIs are incorporated by reference to Chapter 2.4 "EU Taxonomy Disclosures" of the Annual Report.
- Own workforce – total number of employees (ESRS S1 26): Cross-referenced to the consolidated financial statements pursuant to §50(a), disclosed in Chapter 4.5 "Personnel/employees" of the Annual Report.
- CapEx source data (ESRS E1 / EU Taxonomy): CapEx figures are incorporated by reference to the note on the development of the Group's noncurrent assets ("Entwicklung des Konzernanlagevermögens") in the consolidated financial statements.

All referenced information is clearly identifiable, publicly available, and prepared on the same consolidation scope as the sustainability statement.

1.2 Governance

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

OP Group's management team consists of two executive members, the CEO and CFO. There is no representation of employees or other workers within the management bodies. Gender diversity within management is 0%, and no other diversity characteristics considered relevant by the undertaking are represented.

The management team oversees sustainability-related impacts, risks and opportunities and sets sustainability-related priorities based on value-chain assessments. ESG matters are addressed as part of senior management discussions and escalated to the Board where relevant. Progress on material topics and defined targets is monitored through existing management processes and reported to the Board as appropriate.

The CEO is responsible for overall corporate strategy and objectives. The CFO is responsible for defining and coordinating the ESG strategy. Roles and responsibilities are governed by internal rules of procedure and schedules of responsibilities. Collectively, management brings extensive experience across sectors and markets relevant to OP Group's business, including retail, e-commerce and consumer goods. Their professional backgrounds cover strategic leadership, finance, operations and digital transformation, supported by experience gained in international organisations.

In addition, the management team possesses sustainability-related knowledge relevant to OP Group's material impacts, risks and opportunities. This includes experience with environmental and climate-related topics, social and workforce matters, responsible supply chain management, and sustainability-related regulatory and reporting requirements. The management's combined expertise supports informed decision-making and effective oversight of sustainability strategy, targets and performance across the Group's operations and value chain.

The Board performs a supervisory and monitoring function and is responsible for reviewing sustainability reporting in accordance with applicable legal requirements. The Board is updated at least annually on sustainability-related progress and approves strategic decisions, including sustainability disclosures included in the management report. It supports the integration of sustainability considerations into OP Group's strategy, monitors material impacts, risks and opportunities, and reviews progress towards defined targets.

The Board consists of seven members, including two executive and five non-executive members, none of whom are independent. Employees and other workers are not represented. Gender diversity within the Board is 0%. Diversity aspects considered material by OP Group relate primarily to professional background and experience. All Board members have more than ten years of leadership experience. Of the Board members, 57% have significant international career experience, 43% have held university teaching or research roles, 71% have a professional background in finance or controlling, and 57% are founders or co-founders of businesses. These characteristics provide a broad range of perspectives relevant to OP Group's strategic oversight.

Collectively, the Board possesses sustainability-related knowledge relevant to OP Group's business and its material impacts, risks and opportunities, including environmental, social and governance-related matters, regulatory requirements and sustainability reporting considerations.

In addition, the Chair of the Board brings in-depth expertise in sustainability and ESG-related matters, including the development and oversight of ESG strategies, sustainability-driven business transformation and corporate governance. This expertise further strengthens the Board's ability to effectively oversee sustainability-related considerations in accordance with ESRS 2 GOV-2.

ESG steering committee and strategic framework

The ESG Steering Committee was established in 2025 to coordinate and drive the sustainability agenda across OP Group and to ensure that ESG initiatives implemented across countries and subgroups are aligned with the Group's overall strategic objectives. The committee consists of four members representing the Group's subgroups and does not include members of executive management.

The ESG Steering Committee reports to the Group CFO and the CFO of DK, SE and PL, ensuring close alignment between sustainability activities and financial and operational management.

The ESG Steering Committee includes representatives from subsidiaries operating in Germany, the United Kingdom, Spain and Denmark, reflecting OP Group's core markets. This functional and geographic diversity supports informed discussion and decision-making on sustainability matters across the Group.

The ESG Steering Committee sets strategic directions for ESG topics, supports sustainability-related risk management and coordinates the integration of ESG considerations into procurement, production and reporting processes, including CSRD compliance. Strategic implications are discussed with management and approved where required. The Board is informed of progress on an annual basis and approves strategic sustainability-related decisions.

Responsibilities across the administrative, management and supervisory bodies are defined within OP Group's corporate governance framework. These responsibilities are designed to support ethical and compliant business conduct, transparency and accountability in decision-making, as well as the continuous development of the Group's governance practices.

At the respective governance levels, the administrative, management and supervisory bodies are involved in setting direction, overseeing implementation and monitoring adherence to applicable policies, procedures and regulatory requirements, including those related to sustainability matters.

Sustainability-related expertise within these bodies is supported through the collective experience of their members, internal governance processes and reviews, and, where relevant, through targeted training measures or the use of external advisory support.

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

At OP Group, overarching sustainability objectives are developed and coordinated by the ESG Steering Committee. The committee participates in the double materiality assessment and the preparation of the sustainability reporting and works closely with executive management. Key sustainability topics, including material impacts, risks and opportunities, are subsequently reported to the Board. Where relevant, specialist departments or external experts are involved to support discussion and monitoring of specific sustainability matters.

Sustainability is integrated into OP Group's strategy and business model, as further described in the section *1.3.1 Strategy, business model and value chain (SBM-1)*. Progress on sustainability-related actions, targets and identified risks is reported to and discussed by the Board at least annually. Management and the Board incorporate material sustainability considerations into strategic decision-making, supported by analyses of risks and opportunities.

These analyses cover both established and emerging sustainability topics, including regulatory developments. Environmental and social criteria are integrated into risk assessments used to support decisions on major transactions and ongoing strategic alignment. During the reporting period, all material impacts, risks and opportunities identified through OP Group's Double Materiality Assessment were addressed in the Board.

1.2.3 Integration of sustainability-related performance in incentive schemes (GOV-3)

There are currently no sustainability-related performance considerations, including climate-related or other ESG-related aspects, incorporated into the remuneration or incentive schemes of the administrative, management or supervisory bodies.

Sustainability matters are instead addressed through governance structures, strategic oversight and management processes. The integration of sustainability-related performance metrics into remuneration frameworks is not applied at this stage and may be reassessed as the Group's sustainability strategy, targets and data maturity further develop.

1.2.4 Statement on sustainability due diligence (GOV-4)

The corporate sustainability due diligence process applied by OP Group forms an integral part of this sustainability statement. It describes how the core elements of due diligence are embedded in the identification, assessment and management of material impacts, risks and opportunities.

A detailed overview of the individual steps of the due diligence process and their application across the Group is provided in the below table, to which reference is made for further information.

Core elements of due diligence	ESRS disclosure	Reference (Chapter / Disclosure in Sustainability Statement)
Integration of due diligence into governance, strategy, and business model	<ul style="list-style-type: none"> ESRS 2 GOV-2: Information and sustainability aspects addressed by the administrative, management, and supervisory bodies ESRS 2 GOV-3: Integration of sustainability-related performance into incentive systems ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with strategy and business model, and topic-specific ESRS that take into account the interaction between business prospects and material sustainability aspects 	<p>Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies (ESRS 2 GOV-2) (Section 1.2.2)</p> <p>Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3) (Section 1.2.3)</p> <p>Strategy, business model and value chain – Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3) (Section 1.3.3)</p>
Involvement of affected stakeholders in all important steps of due diligence	<ul style="list-style-type: none"> ESRS 2 GOV-2: Information and sustainability aspects addressed by the administrative, management, and supervisory bodies ESRS 2 SBM-2: Interests and views of stakeholders; topic-related ESRS: Consideration of the different stages and purposes of stakeholder engagement throughout the due diligence process ESRS 2 IRO-1: Description of the process for identifying and assessing material impacts, risks, and opportunities ESRS 2 MDR-P: Minimum disclosure requirements for concepts in topic-related disclosures 	<p>Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies (ESRS 2 GOV-2) (Section 1.2.2)</p> <p>Interests and views of stakeholders (ESRS 2 SBM-2) (Section 1.3.2)</p> <p>Management of impacts, risks and opportunities – Description of the process to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1) (Section 1.4.1)</p>

Identification and assessment of negative impacts	<ul style="list-style-type: none"> ESRS 2 IRO-1: Description of the process for identifying and assessing material impacts, risks, and opportunities, including application requirements under specific sustainability aspects in the respective ESRS ESRS 2 SBM-3: Material impacts, risks, and opportunities and their interaction with strategy and business model 	<p>Description of the process to identify and assess material impacts, risks and opportunities (ESRS 2 IRO-1) (Section 1.4.1)</p> <p>Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3) (Section 1.3.3)</p>
Measures against these negative impacts	<ul style="list-style-type: none"> ESRS 2 MDR-A in topic-related ESRS on measures taken and planned, including transition plans to address the impacts 	<p>Topic-specific ESRS – Actions and resources (MDR-A)</p> <ul style="list-style-type: none"> Climate Change – Actions and resources (ESRS E1-3) (Section 2.1.4) Resource use and circular economy – Actions and resources (ESRS E5-2) (Section 2.3.3) Own workforce – Actions related to OP Group’s own workforce (ESRS S1-4) (Section 3.1.6) Workers in the value chain – Actions related to value chain workers (ESRS S2-4) (Section 3.2.6) Business conduct – Actions (ESRS G1) (Section 4.1)
Tracking the effectiveness of these efforts and communication	<ul style="list-style-type: none"> ESRS 2 MDR-M in topic-related ESRS on key figures ESRS 2 MDR-T in topic-related ESRS on targets 	<p>Metrics (ESRS 2 MDR M)</p> <ul style="list-style-type: none"> Climate Change – Energy consumption and mix (ESRS E1 5) (Section 2.1.6) Climate Change – GHG emissions (ESRS E1 6) (Section 2.1.7) Resource use and circular economy – Resource inflows (ESRS E5 4) (Section 2.3.5) Resource use and circular economy – Resource outflows and waste (ESRS E5 5) (Section 2.3.6) Own workforce – Characteristics and metrics (ESRS S1 6, S1 9, S1 16, S1 17) (Sections 3.1.8 – 3.1.11) <p>Targets (ESRS 2 MDR T)</p> <ul style="list-style-type: none"> Climate Change – Targets related to climate change mitigation and adaptation (ESRS E1 4) (Section 2.1.5) Resource use and circular economy – Targets (ESRS E5 3) (Section 2.3.4) Own workforce – Targets related to OP Group’s own workforce (ESRS S1 5) (Section 3.1.7) Workers in the value chain – Targets related to value chain workers (ESRS S2 5) (Section 3.2.7)

1.2.5 Risk management and internal controls over sustainability reporting (GOV-5)

OP Group’s risk management and internal control processes are designed to enhance the Group-wide Risk Management System (RMS) and Internal Control System (ICS) covering business activities, structures and reporting lines across all legal entities.



At present, the RMS and ICS primarily address general business and financial risks and are not yet fully extended to cover sustainability reporting processes. Sustainability reporting is currently supported through defined responsibilities, documented procedures and management oversight within the sustainability function and relevant business units. The further integration of sustainability reporting into the Group's risk management and internal control framework is under development and will be progressively enhanced as the maturity of sustainability-related processes, data availability and reporting systems increases.

Sustainability reporting risks, including risks related to data completeness, accuracy and consistency, are identified and assessed as part of the sustainability reporting process. The identification and assessment of these risks are currently supported through defined responsibilities within the sustainability function and relevant business units, management oversight and documented reporting procedures. The focus is on identifying key risk areas, such as data availability and data quality, and prioritising improvement measures accordingly.

As this is the first year of sustainability reporting under the ESRS and the sustainability statement has not been subject to external assurance, no formal audit of sustainability reporting processes or data has been performed. The further development of controls, validation procedures and governance arrangements for sustainability reporting is under development and will be enhanced over time in line with the maturity of reporting processes and systems.

A uniform, Group-wide internal control framework for sustainability data has not yet been formally established across all entities. Sustainability reporting is therefore supported through defined responsibilities, standardised templates, plausibility checks and management review at Group level.

Findings are integrated at Group level through clearly assigned responsibilities, structured reporting and defined communication channels within the governance framework.

The Internal Control System (ICS) described above does not constitute a separate, fully formalised non-financial internal control system (nICS). Sustainability-related controls are currently embedded in the Group's existing governance and risk management processes and were applied across the Group during the reporting year to support sustainability reporting. The status of these controls and related risk assessments are reported to executive management and the Board as part of the Group's regular governance processes.

1.3 Strategy

1.3.1 Strategy, business model and value chain (SBM-1)

OP Group operates an e-commerce-based printing business offering a broad range of customizable print products through web-to-print platforms. The Group serves primarily B2B customers across multiple European markets. The business model is based on an integrated value chain covering material sourcing, automated production, logistics and digital sales platforms. The business model is based on an integrated value chain covering material sourcing, automated production, logistics and digital sales platforms, enabling centralized and data-driven operations at scale. Compared to decentralised local printing models, this centralised and digital setup allows for higher machine utilisation, reduced set-up waste, optimised logistics and more efficient use of energy and materials per printed unit. This contributes to lower resource and energy intensity per unit compared to fragmented local production. Certified materials, process automation and centralized IT systems support scalable operations and efficient order processing.

OP Group's activities involve upstream suppliers of paper, inks, packaging and technology, and downstream logistics and distribution partners. Customers include corporate clients, small and medium-sized enterprises and marketing agencies.

Core value-chain activities

OP Group's core value-chain activities comprise the following elements:

- **Sustainable sourcing:** Procurement of certified raw materials from suppliers meeting defined environmental and social requirements, including FSC®, PEFC® and Nordic Swan Ecolabel certifications.
- **Efficient production:** Automated offset and digital printing processes designed to improve material efficiency, reduce production waste and lower energy intensity.
- **Logistics optimization:** Collaboration with logistics partners that have publicly stated emissions-reduction objectives, combined with the use of cardboard packaging meeting defined sustainability specifications.
- **Digital innovation:** Continuous development of digital platforms to enable efficient, user-friendly order processing and improved resource management.
- **Responsible corporate governance:** Group-wide standards covering compliance, occupational health and safety, diversity and inclusion, and defined governance policies applicable across the Group.

This integrated approach supports current customer requirements for quality, speed and reliability, while anticipating future expectations related to sustainability and innovation.

Inputs and resources

OP Group maintains business model integrity through structured supplier qualification, certified sourcing and stakeholder engagement. Key inputs include:

- **Raw materials:** Paper, inks and packaging sourced primarily from certified suppliers.
- **Technology:** Advanced printing systems, workflow automation and e-commerce platforms.
- **Human capital:** Skilled employees across production, IT, logistics and customer service functions.
- **Energy:** Electricity increasingly supplemented by renewable sources through on-site photovoltaic installations, electrification initiatives and direct procurement of renewable electricity.
- **Data and infrastructure:** Secure IT systems supporting order processing, customer data management and analytics.

Input development is supported by supplier selection processes based on a Code of Conduct and certification requirements, as well as continuous innovation to optimize material use, reduce waste, improve energy efficiency and further enhance digital platforms.

Value Chain

- **Upstream:** Procurement of certified paper, inks, packaging, technology, and workflow software under long-term, standards-compliant partnerships.
- **Downstream:** Distribution of finished products across Europe via logistics partners and localized platforms, supported by digital customer service.

OP Group occupies a central position as a technology-enabled manufacturer and distributor, connecting raw-material suppliers with end customers. This position supports supply security, operational efficiency and innovation, while enabling the delivery of customized print products and advancing sustainability and digital transformation.

Products, materials and environmental considerations

OP Group's main product groups include business stationery, marketing materials, large-format printing, packaging and specialty print items. Paper is the primary material used in production. Material selection prioritizes FSC® and PEFC® -certified and recycled paper grades where available. For plastics used in large-format printing and packaging, OP Group assesses alternative materials and circularity opportunities.

Energy use and environmental impacts are addressed through energy-efficient technologies, renewable energy sourcing, waste-reduction initiatives, defined ink systems and digital order processing solutions.

Key customer groups and stakeholders

OP Group's business activities influence, and are influenced by, several key customer groups relevant to sustainability matters:

- **Graphic businesses and print buyers:** Predominantly B2B customers such as publishers, corporate clients and event organizers, with requirements relating to print quality, material specifications, certification schemes and transparency on environmental and social aspects.
- **Local communities and SMEs:** Local businesses and communities supported through tailored printing services and local engagement initiatives.
- **End consumers and marketing agencies:** Indirectly reached through OP Group's B2B2C value chain, with expectations regarding product information, material choices and environmental performance influencing strategic priorities.

Further supplementary information on OP Group's corporate strategy, key services and markets is provided in the Annual Report

Strategic priorities and sustainability objectives

Customers are at the core of OP Group's business strategy. The Group focuses on delivering high-quality and affordable printing and packaging solutions while integrating environmental and social considerations across its operations. The strategy is underpinned by a binding framework of minimum standards covering quality, safety, affordability and defined sustainability criteria.

OP Group has established sustainability-related objectives aligned with its business model and stakeholder expectations. These objectives focus on environmental performance, social responsibility and sound governance across the value chain. Key priorities include:

- **Climate action and decarbonization:** OP Group aims to reduce the emissions intensity of its operations and progressively transition towards low-emission energy sources. The Group targets 100% renewable electricity by 2030 (currently 99.45%), supported by on-site solar expansion, electrification initiatives, and direct procurement from electricity suppliers. While renewable electricity sourcing is already close to full coverage, the 2030 target ensures long-term contractual security, group-wide consistency and resilience against potential market and regulatory changes. Emissions management measures also include energy-efficiency improvements, technology upgrades, and the availability of emissions-related information for selected product offerings.
- **Resource efficiency and circular economy:** OP Group addresses resource use through material selection, waste reduction, and supplier collaboration. The Group targets increasing the share of FSC®/PEFC®-certified paper to more than 95% by 2030 (currently 97%) and reducing paper waste to 25% (currently 27%). Supporting measures include supplier engagement, internal product classification frameworks, and the use of calculation tools to support decision-making for selected product segments. ¹
- **Social responsibility and governance:** Ensuring human-rights and labour-standards compliance throughout the value chain, supported by an ESG Target Operating Model, group-wide compliance policies and supplier due-diligence processes.

OP Group operates primarily in European markets, with production sites in Germany, the United Kingdom, Denmark, Poland, Sweden and Spain. Sustainability objectives are applied consistently across these locations, supporting the availability of certified products and affordable lower-carbon options for B2B customers, alongside transparent environmental information.

Number of Employees	
Total number of employees (headcount)	1,672
Breakdown of employees by geographical area (headcount)	Germany: 546 Denmark: 412 Poland: 373 United Kingdom: 251 Sweden: 51 Spain: 39

Net revenue	289,848 TEUR
Net revenue (other)	4,492 TEUR
Total net revenue (in financial statements)	294,420 TEUR

¹ FSC licens code: C010493, C163538, C194852, C168702, C106140.

1.3.2 Interests and views of stakeholders (SBM-2)

OP Group's stakeholder engagement approach is based on transparency, structured dialogue and collaboration. Stakeholder perspectives are gathered through a combination of regular communication, formal feedback mechanisms and targeted engagement activities. These inputs support strategic decision-making, promote circularity principles and social objectives, and contribute to the advancement of the Group's ESG priorities.

Key stakeholder groups

Internal stakeholders include the Board and senior management, who set strategic direction and integrate sustainability into the corporate strategy. The ESG Steering Committee and cross-functional working groups representing all entities within the Group coordinate sustainability initiatives and implementation. Employees are engaged through tools such as employee net promoter score (eNPS) surveys, workshops and local initiatives aimed at fostering ownership of sustainability objectives.

External stakeholders include shareholders and investors, who are engaged on ESG priorities and long-term value creation. Suppliers and business partners, engaged through due-diligence processes and collaboration on sustainability targets. Customers, who influence sustainability priorities through their demand for certified products and transparent product information and regulators and industry bodies, engaged through compliance processes, consultations and participation in industry forums.

Stakeholder engagement processes

OP Group applies a streamlined stakeholder engagement process focused on core business priorities. Feedback is collected through employee surveys, workshops, town halls, supplier assessments, discussions with strategic partners, customer feedback mechanisms, market research and consultations with investors and authorities, particularly in the context of the double materiality assessment. These activities are complemented by standard internal and external communication channels, including intranet updates and newsletters.

A defined governance framework ensures that stakeholder insights are systematically considered in decision-making processes and support compliance with ESG and CSRD requirements. Engagement outcomes are integrated into strategic planning to address market expectations, regulatory developments and social considerations, thereby supporting innovation, sustainability and long-term stakeholder trust.

Use of stakeholder insights

Results from stakeholder engagement and materiality assessments are presented to executive management and the Board. These insights are used to set ESG priorities, update relevant policies (including the ESG Policy and Supplier Code of Conduct), shape action plans, allocate resources and monitor progress. In developing its strategy, OP Group considers the interests of all relevant stakeholder groups, with particular emphasis on customers, whose expectations regarding quality, price and sustainability significantly influence the Group's business approach. Key focus areas include reducing the environmental impact of printing solutions compared to standard alternatives, maintaining transparent communication on environmental performance, expanding recycled product offerings and enhancing energy-efficient production methods.



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

Material impacts, risks and opportunities (IROs) identified through OP Group’s Double Materiality Assessment are generally addressed through the applicable ESRS disclosure requirements. IROs related to the entity-specific topic of cybersecurity are covered through additional entity-specific disclosures. Detailed information on material IROs is provided in the relevant topic-specific chapters.

The table below provides an overview of the material impacts, risks and opportunities identified through the Double Materiality Assessment, mapped by ESRS topic.

Standard	Positive Impact	Negative Impact	Risk	Opportunity
Climate Change	-	Contribution to climate change;	Climate related transitional risks; climate related physical risks; Energy consumption	-
Water and marine resources	-	Water consumption	-	-
Resource use and circular economy	-	Purchase of non-circular materials; high material consumption	-	-
		Generation of non-recyclable waste; short life cycle product distribution		
Own Workforce	Fair working time and time models	-	-	Working conditions; equal treatment; diversity
Workers in the value chain	-	Working conditions and other work-related rights	-	-
Business Conducts	-	-	Corruption and bribery	Corporate culture; supplier management

The Double Materiality Assessment identified both positive and negative impacts on people and the environment arising from OP Group’s business activities. Further context on the strategic implications of these impacts is provided in *1.3.1 Strategy, business model and value chain (SBM 1)*. Material impacts were assessed across different time horizons: short term (1–3 years) for topics such as energy use and waste generation; medium term (3–7 years) for demand for certified products and regulatory changes; and long term (7–10+ years) for structural topics such as resource scarcity, biodiversity loss and digital transformation.



OP Group's activities influence environmental and climate-related matters through material selection, production processes and technology use. The Group applies FSC®/PEFC®-certified paper grades and energy-efficiency-oriented technologies as part of its operational approach. Core activities, including printing, finishing and packaging, generate impacts related to resource use, emissions and waste. Upstream suppliers are associated with biodiversity- and land-use-related considerations, while downstream logistics contribute to greenhouse gas emissions and packaging waste.

These impacts and associated risks are addressed through supplier engagement, the use of recognised certification schemes and operational efficiency initiatives. OP Group's strategy focuses on managing sustainability-related risks and identifying opportunities linked to innovation and circularity, with the aim of strengthening resilience to climate-related risks, regulatory developments and technological change. Measures include the development of defined product criteria, digital solutions supporting operational efficiency and transparency, and continuous monitoring of relevant sustainability indicators.

Resilience and time horizons

Resilience considerations are integrated into risk management and strategic planning through regular materiality reviews and stakeholder consultations. While the same time-horizon definitions are applied as for impacts, the distribution of topics across time horizons differs:

- **Short term (1–3 years):** Operational risks related to energy costs, compliance with EU sustainability regulations, and supplier certification.
- **Medium term (3–7 years):** Transition risks from stricter carbon reduction targets and evolving customer preferences for sustainable products.
- **Long term (7–10+ years):** Structural changes in the printing industry, including digital substitution and resource scarcity.

Current measures, such as energy-efficiency improvements, certified sourcing and the production of products containing recycled materials, support short- and medium-term resilience. Long-term adaptability depends on continued innovation and the development of circular partnerships. These considerations inform scenario planning and investment decisions supporting the transition towards a low-carbon economy.

At the time of reporting, the identified IROs are not expected to have a significant effect on OP Groups financial position, performance, or cash flows. However, the Group monitors regulatory changes, supply chain dynamics, and market trends toward sustainable products, which may impact asset valuation, certified material costs, and environmental compliance provisions. These factors are integrated into financial planning and risk management.

1.4 Management of impacts, risks, and opportunities

1.4.1 Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)

OP Group conducts a structured Double Materiality Assessment (DMA) in line with ESRS requirements and EFRAG implementation guidance to identify material impacts, risks and opportunities (IROs). The assessment addresses both impact materiality (“inside-out”), reflecting

how OP Group's activities affect people and the environment, and financial materiality ("outside-in"), reflecting how sustainability matters may affect the Group's financial position, performance and future prospects.

The DMA is performed on an annual basis and covers OP Group's own operations as well as its upstream and downstream value chain. The process combines centralised data collection using standardised methods with stakeholder engagement, including surveys, workshops and supplier assessments. The assessment is based on a combination of centralised data collection using standardised methods and stakeholder engagement, including surveys, workshops and supplier assessments. The DMA focuses on key business areas such as printing and packaging activities, logistics, supplier and transport relationships, and relevant geographic risk areas. Priority risks identified through the process include energy-intensive production processes, paper sourcing from potentially sensitive regions and transport-related emissions. The outcomes of the DMA inform OP Group's governance, strategy and operational decision-making, including supplier management, sustainable procurement, product development and the monitoring of key performance indicators across the value chain.

Key steps of the Double Materiality Assessment

Analysis of value chain:

OP Group assesses impacts, risks and opportunities arising from its own operations as well as upstream and downstream activities. Insights from the value-chain analysis are integrated into governance and strategy processes and linked to supplier management, sustainable procurement initiatives, product innovation and performance monitoring.

Identification and involvement of stakeholders:

Relevant stakeholder groups are identified for each sustainability topic, and qualified representatives contribute to the identification and assessment of IROs. Input is obtained through engagement with investors, employees, management, suppliers, customers and regulators via consultations, workshops, surveys, benchmarking exercises and management reviews. For each ESRS topic, responsible internal functions and affected stakeholder groups are documented.

Identification of impacts & derivation of risks and opportunities

The identification of Impacts, Risks, and Opportunities (IROs) was based on an analysis of OP Group's business activities and aligned with the ESRS 1 AR16 list of sustainability matters included in the materiality assessment. Further input considered were relevant ESRS definitions, external benchmarks (including first-wave CSRD reports), and updated EFRAG guidance, with a final review and approval conducted by management.

Assessment & prioritisation of IROs:

Identified impacts, risks and opportunities (IROs) are assessed and prioritised using a structured and documented scoring methodology as part of OP Group's Double Materiality Assessment.

Impacts are assessed on an overall scale ranging from 0 to 12. The assessment is based on the severity of the impact, reflected through scale, scope and remediability, and, where relevant, likelihood for potential impacts. For human-rights-related impacts, severity takes precedence over likelihood, in line with ESRS requirements. The resulting overall assessment of the impact is

considered material for reporting purposes when the score is 8 or higher. Impacts scoring below this threshold are not considered material.

Risks and opportunities are assessed on an overall scale ranging from 0 to 5, reflecting the likelihood of occurrence and the magnitude of potential financial effects. The resulting overall assessment of risks and opportunities is considered material for reporting purposes when the score is 3 or higher. Risks and opportunities scoring below this threshold are not considered material.

Materiality is therefore determined through the application of these defined threshold values to the overall impact and risk/opportunity assessments. IROs exceeding these thresholds are classified as material, while IROs below the thresholds are not considered material. This ensures consistent prioritisation and transparent determination of material IROs in accordance with ESRS requirements.

Monitoring:

Sustainability-related risks are identified and assessed as part of OP Group's sustainability reporting and double materiality processes, rather than being fully integrated into the Group's Risk Management System (RMS). ESG-related risks are reviewed and updated on an annual basis to reflect changes in regulatory, market and operational conditions.

All identified risks, including sustainability-related risks, are documented, assessed and prioritised and inform the overall risk understanding at Group level. Relevant sustainability-related risks are reported to executive management and the Board in the context of annual sustainability reporting and material risk assessment.

As this is OP Group's first reporting period under the CSRD, the DMA process was established during the reporting year. No changes to the methodology have occurred. The process will be reviewed and further refined in 2026.

1.4.2 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities (IRO-1)

As required in ESRS 2 IRO 1 OP Group identifies biodiversity- and ecosystem-related impacts, dependencies and risks as part of its Double Materiality Assessment. The assessment draws on internal site reviews, supplier information, FSC®/PEFC® certification coverage and compliance with applicable EU regulations. Key assessment criteria include proximity of operations to biodiversity-sensitive areas, sourcing practices and certification status. The assessment of biodiversity and ecosystem related impacts showed that those are not material.

All OP Group production sites are located outside biodiversity-sensitive areas. Upstream biodiversity impacts and dependencies primarily relate to the sourcing of wood and pulp, which is largely covered by FSC®/PEFC®-certified forests and secondary raw materials such as sawmill by-products. Downstream biodiversity impacts are considered limited. No ecosystem services were identified as being disrupted or likely to be disrupted by OP Group's activities.

Potential transition risks relate mainly to changes in EU biodiversity regulation and increasing market demand for certified products. Physical risks, such as forest degradation, were assessed as low due to regionally focused certified sourcing and the use of secondary raw materials. Opportunities include growing demand for certified and sustainably sourced products. Systemic

biodiversity risks were reviewed at a high level based on regulatory and trend analysis, with overall exposure assessed as low and no scenario analysis performed.

Internal checks and supplier certification reviews did not identify any sites with a high likelihood of causing significant negative biodiversity impacts. No affected communities were identified through screening for proximity to sensitive ecosystems and stakeholder mapping. Therefore, direct community engagement was not initiated. Given the low risk profile, no specific biodiversity mitigation measures have been implemented. OP Group continues to rely on certified sourcing and ongoing monitoring through supplier audits and certification reviews.

1.4.3 Disclosure Requirements in ESRS covered by the undertaking's sustainability statements (IRO-2)

The Double Materiality Assessment forms the basis for assigning material impacts, risks and opportunities to the relevant sustainability topics in accordance with ESRS 1 AR 16. A sustainability topic is classified as material where at least one material impact and/or material risk or opportunity has been identified. All material topics are addressed through the applicable ESRS disclosure requirements, with further details provided in the relevant topicspecific sections of this sustainability statement

2. Environmental Information

2.1 Climate Change (ESRS E1)

2.1.1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities (IRO-1)

To assess OP Group's climate-related impacts, OP Group analyses its greenhouse gas (GHG) emissions across direct and indirect sources in accordance with the GHG Protocol. This includes emissions from stationary and mobile fuel combustion (Scope 1), emissions from purchased electricity and heat for own consumption (Scope 2), as well as relevant value-chain emissions (Scope 3). Scope 3 categories considered include purchased goods and services, fuel- and energy-related activities, upstream transportation and distribution, waste generated in operations, business travel and employee commuting. Actual and potential impacts on climate change are assessed primarily through the calculation and analysis of OP Group's GHG emissions.

In addition, OP Group has carried out a climate risk assessment covering its activities and assets in line with ESRS requirements. The assessment did not identify any immediate or significant climate-related risks requiring urgent mitigation measures. However, due to OP Group's operational presence in Spain, potential exposure to heat-related physical risks has been identified. OP Group is therefore considering the development of targeted adaptation measures to address potential future impacts.

Physical climate risk assessment

The assessment of physical climate risks is based on climate projections derived from models informed by the Assessment Reports of the Intergovernmental Panel on Climate Change (IPCC).

Physical climate hazards are analysed under three emissions scenarios to reflect a range of potential future climate pathways:

- **SSP1-2.6 - Optimistic scenario:** the temperature increase stabilizes at around 1.8°C by the end of the century.
- **SSP2-4.5 - “Middle of the Road” scenario:** this realistic scenario is projected to lead to an end-of-century warming around 2.7°C.
- **SSP5-8.5 - “High-reference” scenario:** this pessimistic scenario is projected to lead to an end-of-century warming around 4.4°C.

Physical climate risks are identified through a structured screening process that evaluates the potential impact of climate-related hazards on assets and operations. The approach considers hazard, exposure, and vulnerability. Hazards such as extreme heat, flooding, storms, and drought are analysed under future climate conditions to understand their potential severity. Exposure is assessed by examining the geographic location of each site and its specific characteristics, while vulnerability reflects how susceptible these assets are to damage based on the respective activities at the site. This process covers both chronic hazards (changing air temperature, changing precipitation patterns, changing wind patterns, sea level rise, water stress, soil erosion), and acute hazards (extreme heat, extreme cold, wildfire, tropical cyclone, storm, drought, extreme precipitation, flood, landslide, earthquake, subsidence). No supplier sites were analysed within this assessment.

For the physical climate risk analysis, a high-emission scenario was selected, as it represents the greatest greenhouse gas concentrations and, consequently, the most significant physical risk impacts. Physical climate risks are analysed up to the year 2050, utilizing a 30-year average to assess trends in climate patterns. The time horizon until 2050 covers the expected lifetime of the assets.

Transition climate risk and opportunity assessment

Transition risks and opportunities are assessed by analysing how changes associated with the transition to a low-carbon economy may affect OP Group’s business activities. The assessment follows the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and considers developments in climate-related policy and regulation, technological change, market dynamics and evolving stakeholder expectations.

Key factors assessed include potential regulatory tightening, carbon pricing mechanisms, increasing energy-transition costs, and changing customer and investor expectations related to decarbonisation. To capture potential transition pathways, forward-looking scenarios aligned with recognised frameworks are applied, including the Network for Greening the Financial System (NGFS) Net Zero 2050 scenario, which assumes the implementation of ambitious climate policies and technological innovation to limit global warming to 1.5 °C and achieve net-zero CO₂ emissions around 2050.

Transition-related risks and opportunities are assessed qualitatively based on their potential impacts on revenues, operating expenditures (OpEx) and capital expenditures (CapEx), as well

as relevant NGFS climate indicators. The assessment has been conducted in cooperation with an external third-party provider. The time horizon for the transition risk assessment extends to 2030, aligned with OP Group’s near-term emission-reduction objectives.

Relevant transition-related developments include potential increases in GHG emission pricing and energy-transition-related costs. Based on the assessment performed, no assets were identified that are incompatible with, or would require significant additional effort to become compatible with, a transition towards a climate-neutral economy.

Material IROs for climate change

Sub-topic	IRO-Category		Scenario	Time Horizon	Origin within the value chain	Description
Climate change adaptation	Risk		Potential	Medium-/ and long-term	Upstream and own operations	OP Group faces a risk related to new legislation that may require heat mitigation measures in its operating locations, potentially leading to increased company costs.
Climate change mitigation	Impact	(-)	Actual	Short-, medium-, and long-term	Entire value chain	OP Group has a negative impact on climate change due to CO ₂ emissions from energy consumption, production processes, transport, and scope 3 activities in its value chain, which leads to increased greenhouse gas emissions.
Climate change mitigation	Risk		Potential	Medium-/ and long-term	Own business activities	OP Group faces a risk of exposure to a potential carbon price in its operations, which could lead to an increase in annual operating expenses.
Energy	Risk		Potential	Short-/ and medium-term	Own business activities	OP Group faces a risk from implementing measures to reduce energy consumption in its operations, which could result in higher costs and lower financial performance.

2.1.2 Transition plan for climate change mitigation (E1-1)

The OP Group is committed to continuously reducing its environmental footprint. To achieve this, the OP Group has set emission reduction targets for Scope 1 and Scope 2 emissions that are in line with the Paris Climate Agreement. OP Group has also set a reduction target for its supply emissions. By switching to green electricity and the installation of photovoltaic systems, as well as implementing energy efficiency measures, emission from own operations (Scope 1 and Scope 2) were reduced from 6,101 tCO₂e in the reference year 2022 to 1,596 tCO₂e in the reporting year 2025, corresponding to a reduction of 74%. The OP Group continues to work on

reducing its long-term environmental impact but does not currently have a transition plan developed in line with the ESRS. Incorporating these goals into a detailed transition plan that is consistent with the ESRS is currently under examination.

2.1.3 Policies related to climate change mitigation and adaptation (E1-2)

The **ESG Policy** of the OP Group aims to strategically diminish the company's environmental impact, embed ESG principles into its business operations, and further awareness among employees and stakeholders. It provides a comprehensive framework to address all significant climate-related impacts. The policy articulates the Group's commitment to lowering its environmental footprint, specifically to reducing greenhouse gas emissions by measuring, monitoring, and continuously decoupling its CO₂ footprint from its growth.

The policy establishes a comprehensive sustainability framework that enhances resilience against climate-related impacts by promoting efficient resource use, waste management, and certified sourcing, while also prioritizing ethical business practices and employee treatment to integrate social responsibility and strong governance in combating climate change.

The ESG Policy aims to embed ESG considerations into business strategy and strengthen awareness and engagement across the organization. It positions OP Group to meet emerging regulatory requirements and potential carbon pricing by prioritizing energy efficiency, renewable energy, and sustainable practices, thereby mitigating financial risks and enhancing long-term resilience.

To reduce its ecological footprint, the policy promotes resource efficiency and circularity as part of OP Group's strategy to address the material climate-related impacts and risks identified in the Double Materiality Assessment. In particular, the measures address the negative impact related to climate change mitigation caused by greenhouse gas emissions from energy consumption and material use across the value chain, as well as climate-related risks associated with increased energy costs and potential carbon pricing.

The policy focuses on minimising paper waste and improving material efficiency through optimised production processes and closed-loop systems, while minimising waste, boosting recycling and sourcing sustainable materials. Furthermore, risks related to non-circular material inflows (e.g. plastic, aluminium and textiles) are addressed through certified sourcing and active supplier engagement, thereby supporting emission reductions per unit produced and enhancing resilience against climate-related transition risks.

OP Group monitors its ESG progress through annual measurement of its CO₂ footprint and tracking of resource efficiency targets. ESG performance is reviewed annually and disclosed in ESG reports published on the company's website.

The ESG Policy is implemented group-wide without geographic limitations or exclusions and applies to all OP Group operations and its upstream value chain, including suppliers. The policy and related ESG disclosures are publicly available to employees, suppliers and customers via OP Group's website, including through the ESG report published online:

<https://www.onlineprinters.de/c/lp/was-uns-wichtig-ist>

Each organisational unit has an appointed ESG contact, and progress is coordinated and consolidated by two Group ESG Responsible, who report directly to Executive Management and the Board. Continuous improvement is supported through regular reviews and updates of the policy. The group-wide ESG Steering Committee has primary responsibility for oversight of the ESG Policy, supported by Executive Management.

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

OP Group pursues a comprehensive decarbonisation approach, combining multiple mitigation levers to address climate change. This approach is reflected in a range of strategic initiatives and tangible results achieved across the Group's operations.

Since 2022, OP Group has reduced its Scope 1 and Scope 2 greenhouse gas emissions by 74%, decreasing from 6,101 tCO₂e in 2022 to 1,596 tCO₂e in 2025. This reduction has primarily been driven by energy efficiency improvements and a higher share of renewable energy in total energy consumption.

Over the same period, the share of renewable energy increased from 55% to 77%. In addition, on-site renewable electricity generation has been expanded through the installation of solar photovoltaic systems in Germany and Denmark. Production sites in the UK, Denmark, Germany and Sweden have been supplied with 100% renewable electricity since 2021.

To further support its decarbonisation efforts, OP Group continues to roll out projects financed through Sustainable Development Fund (SDF) loans across all entities. These projects include investments in solar PV systems, the electrification of material handling equipment such as forklifts, and the procurement of 100% renewable electricity at all locations. Additional operational electrification measures include the replacement of diesel generators with electric substations, with the transition in the UK planned for completion in 2026, the gradual replacement of vehicles with electric alternatives where operationally feasible, and the deployment of heat pumps, energy-efficient heating solutions and improved building insulation. These measures aim to reduce energy demand, lower emissions and mitigate urban heat impacts.

In parallel, OP Group is strengthening the quality and robustness of its greenhouse gas emissions data, with a particular focus on Scope 3 emissions. Where feasible, the Group is transitioning from spend-based to activity-based calculation methodologies. OP Group actively engages with suppliers, logistics partners and employees to improve data consistency and reliability and to identify additional emission reduction opportunities across the value chain.

These actions cover all OP Group sites and support the ESG Policy's overarching objective of reducing the Group's environmental impact while integrating ESG principles into core business activities. Based on the results of the climate risk analysis conducted, no additional measures are currently required in relation to climate change adaptation.

Capital expenditures related to actions supporting OP Group's sustainability targets amounted to €6.3 million. Further information on capital expenditures aligned with the environmental objective of Climate Change Mitigation (CCM) is provided on page 46. All actions are ongoing, embedded in normal operations and financed through available financial resources. The capital expenditures primarily consist of additions to tangible assets and rights of use from assets. In the financial year 2025, OP Group did not incur capital or operating expenditures under a CapEx plan in accordance

with Delegated Regulation (EU) 2021/2178. Additional details are disclosed in the EU Taxonomy reporting.

The reduction in Scope 1 and Scope 2 emissions has primarily been driven by increased sourcing of renewable electricity, energy efficiency improvements and the electrification of selected operational processes. Further contributions stem from on-site renewable energy generation and the gradual replacement of fossil fuel-based equipment with electric alternatives. Together, these measures support the Group's transition towards lower-carbon operations.

The actions currently implemented and planned are expected to deliver further reductions in operational greenhouse gas emissions in the coming years. Continued electrification, expansion of on-site renewable energy generation, increased procurement of renewable electricity and improvements in building energy performance are anticipated to further reduce Scope 1 and Scope 2 emissions. In addition, enhanced engagement with suppliers and logistics partners is expected to improve Scope 3 data quality and support the identification of emission reduction opportunities across the value chain. OP Group will continuously monitor the effectiveness of these measures and adjust its approach as part of its ongoing climate strategy implementation.

For each key action addressing material climate-related impacts, risks and opportunities, OP Group defines an expected time horizon for implementation as part of its climate strategy. Short-term actions primarily focus on measures that can be implemented within the current reporting period, such as operational efficiency improvements, increased use of renewable electricity and optimisation of existing processes. Medium-term actions typically relate to initiatives requiring further planning or investment, including broader energy efficiency programmes, supplier engagement and gradual adjustments to operational practices. Long-term actions relate to structural changes and strategic considerations aimed at supporting OP Group's long-term transition and resilience, including the assessment and potential development of a transition plan aligned with the ESRs. This approach ensures that climate-related mitigation, adaptation and transition actions are prioritised and managed over time in line with OP Group's business development and risk profile, and that progress can be monitored across different planning horizons.

2.1.5 Targets related to climate change mitigation and adaptation (E1-4)

OP Group is committed to reducing its greenhouse gas (GHG) emissions and has established emission reduction targets aligned with the Science Based Targets initiative (SBTi). The targets are designed to support the Paris Agreement objective of limiting global warming to 1.5°C. The current climate-related targets were established in 2022, prior to the implementation of CSRD, and remain unchanged during the reporting period.

The Group aims to reduce Scope 1 and Scope 2 emissions by 42% by 2030, using 2022 as the base year. Baseline emissions amounted to 6,101 tCO₂e, with 919 tCO₂e in Scope 1 and 5,182 tCO₂e in Scope 2. Scope 2 emissions included in the target are calculated using the market-based method. In addition, OP Group has set a target to reduce Scope 3 emissions by 25% by 2030, based on a 2022 baseline of 86,283 tCO₂e. The targets cover the relevant greenhouse gases included in the Kyoto Protocol and apply to all OP Group sites.

Due to extensive sourcing of renewable electricity, energy-efficiency improvements and selected electrification initiatives, Scope 1 and Scope 2 emissions are already close to full coverage



compared to the 2022 baseline. Nevertheless, the 2030 target remains in place to ensure long-term contractual stability, group-wide consistency and resilience against potential market and regulatory changes. The targets remain unchanged and are based on SBTi guidance, applying a sectoral decarbonisation pathway aligned with a 1.5°C scenario. In addition to the Scope 1 and Scope 2 target, OP Group has also established a reduction target for Scope 3 emissions. Scope 3 emissions are addressed through supplier engagement and value chain initiatives. Progress in this area depends to a significant extent on external actors and is therefore monitored and reported separately. No significant changes have been made to baseline values or the presentation of progress over time. The targets support the overarching objective of OP Group's ESG Policy to reduce its environmental impact. At present, full consistency between the boundaries applied to GHG emission reduction targets and those used for reporting the GHG inventory has not been achieved. The target boundary differs from that applied under Disclosure Requirement E1-6 (GHG emissions), as the emission reduction targets currently do not cover all scopes and greenhouse gases included in the GHG inventory. Information on the scopes and greenhouse gases covered by the emission reduction targets is disclosed under ESRS E1-4 (GHG emission reduction targets). The Group intends to further improve transparency and alignment between target and inventory boundaries in future reporting periods.

The selected base years and baseline values were considered representative at the time the targets were set and reflect relevant external influences during the base period. However, as this is OP Group's first reporting year under CSRD and the Group has undergone significant structural changes in recent years, including mergers and acquisitions, the existing targets have been maintained to preserve comparability.

When setting its GHG emission reduction targets, OP Group considered anticipated future developments, including changes in production volumes, customer demand, regulatory requirements and potential technological developments. At least one climate-related scenario compatible with limiting global warming to 1.5°C was considered. The analyses are reviewed annually to maintain alignment with evolving climate policies. OP Group has not identified specific new technologies as being required to achieve its current targets and does not foresee a defined role for new technologies at this stage.

In addition, OP Group has set an absolute target to source 100% of its electricity consumption from renewable energy sources by 2030. This target applies to all operations and is measured as a share of total electricity consumption. As of 2025, renewable electricity accounted for 99.45% of total consumption. While this reflects a very high level of renewable electricity sourcing, the 2030 target ensures full and consistent coverage across all operations, including remaining sites and contractual arrangements, and secures long-term alignment with OP Group's climate objectives. Progress is monitored using market-based accounting.

The key figures disclosed in this section have not been subject to external assurance. The Group's greenhouse gas emissions data (Scope 1, Scope 2 and Scope 3) have been prepared and reviewed with the support of an external sustainability consultant using recognised methodologies, including the Greenhouse Gas Protocol. Unless otherwise stated, no independent external assurance has been performed.

The target-setting process involved relevant members of management and was reviewed by the ESG Steering Committee. No changes were made to targets, metrics, methodologies or assumptions during the reporting period. External stakeholders were not directly engaged for the purpose of target setting. OP Group plans to establish updated climate-related targets in 2026, including a revised baseline year aligned with the updated group structure and organisational scope. The targets for climate change mitigation and adaptation are not based on conclusive scientific evidence.

2.1.6 Energy consumption and mix (E1-5)

OP Group's energy consumption in 2025 amounted to:

Energy consumption and mix	FY 2025
(1) Fuel consumption from coal and coal products (MWh)	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	3,023
(3) Fuel consumption from natural gas (MWh)	1,938
(4) Fuel consumption from other fossil sources (MWh)	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	1,635
(6) Total fossil energy consumption (MWh)	6,598
<i>Share of fossil sources in total energy consumption (%)</i>	23%
(7) Consumption from nuclear sources (MWh)	0
<i>Share of consumption from nuclear sources in total energy consumption (%)</i>	0
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	21,171
(10) The consumption of self-generated non-fuel renewable energy (MWh)	430
(11) Total renewable and low carbon energy consumption (MWh)	21,601
<i>Share of renewable and low carbon sources in total energy consumption (%)</i>	77%
Total energy consumption (MWh)	28,199

Energy intensity ratio:

OP Group's activities are classified under NACE code 18.1 – Printing and service activities related to printing, which is identified by ESRS as a high climate impact sector. Consequently, the entirety of OP Group's energy consumption is considered attributable to activities in high climate impact sectors for the purpose of calculating the energy intensity indicator.

OP Group operates a centralised and digital production model that enables the bundling of print orders across markets. This allows for the operation of high-efficiency production equipment with high utilisation rates and reduced idle time. As a result, energy consumption is optimised through fewer set-ups, more continuous production runs and more efficient use of installed capacity.

This structural setup supports lower energy consumption per unit of output compared to less integrated production models, without relying on individual site-level optimisation measures alone.

The energy intensity ratio is calculated as total energy consumption from activities in high climate impact sectors divided by net revenue from those activities. Net revenue used in the calculation is fully reconcilable with the relevant line items in the financial statements.

Energy intensity per net revenue	2025
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/ Revenue in mEUR)	97.28 MWh/mEUR

To calculate the energy mix, the respective energy mix data for the relevant energy sources at each location are used and multiplied by the respective energy consumption figures. Total energy consumption is recorded based on meter readings and/or energy supplier invoices. For locations and energy sources for which no primary data could be collected, estimation methods were used.

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

Total GHG emissions disaggregated by Scopes 1, 2 and 3	Retrospective		Milestones and Target Years	
	Base Year 2022	2025	2030 target (absolute)	Notes
Gross Scope 1 GHG emissions (tCO ₂ eq)	919	1,223	n/a	No standalone target; included in combined Scope 1+2 reduction
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	n/a	7,750	n/a	Provided for transparency only
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	5,182	373	n/a	Basis for Scope 1+2 target tracking
Scope 1 + Scope 2 (combined, market-based)	6,101	1,596	3,539	42% reduction vs. 2022 baseline
Significant Scope 3 GHG Emissions				
Total Gross indirect (Scope 3) GHG emissions (tCO ₂ eq)	86,283	95,779	67,300	25% reduction vs. 2022 baseline
Purchased goods and Services		72,366		
Fuel and energy-related activities		2,134		
Upstream transportation and distribution		11,715		
Capital Goods		3,103		
Waste generated in operations		2,484		
Business traveling		118		
Employee commuting		1,405		
End-of-life treatment of sold products		2,235		
Processing of sold products		221		
Total GHG Emissions				
Total GHG emissions (Location-based) (tCO ₂ eq)		104,751		
Total GHG emissions (Market-based) (tCO ₂ eq)		97,374		

Gross Scope 1 GHG emissions: Gross Scope 1 GHG emissions from the consolidated accounting group amounted to 1,223 tCO₂e in the reporting year.

Gross Scope 2 GHG emissions – location-based: Gross location-based Scope 2 GHG emissions from the consolidated accounting group amounted to 7,750 tCO₂e in the reporting year.

Gross Scope 2 GHG emissions – market-based: Gross market-based Scope 2 GHG emissions from the consolidated accounting group amounted to 373 tCO₂e in the reporting year.

Share of Scope 1 emissions under regulated emission trading schemes: 0 % of OP Group's Scope 1 GHG emissions are covered by regulated emission trading schemes.

Contractual instruments used for Scope 2 (market-based) emissions: Market-based Scope 2 GHG emissions are calculated using Guarantees of Origin (GoOs). 99.45 % of market-based Scope 2 electricity consumption is covered by contractual instruments that convey renewable energy attributes.

Biogenic CO₂ emissions related to Scope 2: No biomass-based district heating is used, and biogenic CO₂ emissions are therefore not applicable for Scope 2 GHG emissions.

The emission factors applied for the calculation of the Scope 2 GHG emissions do not separately indicate the percentage of biomass or biogenic CO₂ emissions. No biomass-based district heating is used, and biogenic emissions are only relevant in minor amounts for vehicle fuels, which are accounted for under Scope 1, not Scope 2 or Scope 3.

Availability of non-CO₂ gases in Scope 2 emission factors: GHG emission factors applied for Scope 2 calculations do not separately specify non-CO₂ gases for all energy sources. Where such gases are not explicitly available in the emission factors, this limitation is reflected in the reported Scope 2 figures.

Use of primary data in Scope 3 calculations: Scope 3 GHG emissions are calculated using a combination of supplier-specific, activity-based and spend-based data. Supplier-specific and activity-based data are primarily applied for major emission categories such as purchased goods and services and transportation, while spend-based data is used where primary data is not available. Due to methodological limitations, OP Group does not disclose a quantified percentage split between primary and secondary data sources.

Biogenic CO₂ emissions in the value chain (Scope 3): Biogenic CO₂ emissions from the combustion or biodegradation of biomass in OP Group's value chain are not material and are therefore not reported separately from gross Scope 3 GHG emissions.

OP Group provides details about gross Scope 1 GHG emissions originating from biogenic CO₂ emissions, resulting from biomass combustion or biodegradation, separately within Scope 1 GHG emissions. These result to zero CO₂ emissions but do not encompass GHG types like CH₄ and N₂O, which are reported under the regular Scope 1 emissions.

Carbon accounting methodology and calculation approaches

The carbon accounting for OP Group is conducted in accordance with the **GHG Protocol** and covers all greenhouse gases included in the **Kyoto Protocol (including NF₃)**. The calculations are performed in collaboration with a third-party provider to ensure methodological consistency and data quality.

Scope 1 GHG emissions represent direct emissions from sources owned or controlled by OP Group. These include emissions from stationary and mobile combustion, process emissions and fugitive emissions. Scope 1 emissions are calculated using activity-based data, such as energy consumption (kWh), fuel use (litres) and distances travelled (kilometres), combined with relevant emission factors, primarily sourced from **DEFRA**.

Scope 2 GHG emissions represent indirect emissions from the consumption of purchased electricity, heat and steam. Scope 2 emissions are calculated using activity data based on kWh consumption across all locations and appropriate emission factors. In accordance with the GHG Protocol, Scope 2 emissions are reported using both the **location-based** and **market-based** methods.

Scope 3 GHG emissions are calculated for the relevant and significant value chain categories using the following approaches:

- **Scope 3.1 – Purchased Goods and Services:** Calculated using a combination of supplier-specific data, activity-based data and spend-based data, depending on data availability and materiality.
- **Scope 3.3 – Fuel- and Energy-Related Activities:** Calculated using company-specific energy consumption data combined with relevant emission factors.
- **Scope 3.4 – Upstream Transportation and Distribution:** Calculated using a combination of supplier-specific, activity-based and spend-based data.
- **Scope 3.5 – Waste Generated in Operations:** Calculated using activity-based data for different waste types and treatment methods.
- **Scope 3.6 – Business Travel:** Calculated using a combination of activity-based and spend-based data, depending on the type of travel.
- **Scope 3.7 – Employee Commuting:** Calculated using a combination of activity-based data and estimations where primary data is not fully available.
- **Scope 3.12 – End-of-Life Treatment of Sold Products:** Calculated using activity-based data.

OP Group aims to continuously improve the quality and robustness of its Scope 3 data. Planned improvements include increasing the use of supplier-specific emissions data, particularly for major purchases such as paper; strengthening engagement with suppliers and distribution partners to obtain more activity-based or supplier-specific data for transportation and logistics; improving monitoring of waste generation to enable more comprehensive activity-based calculations; obtaining more granular activity-based data for business travel by transportation mode; and

collecting broader employee commuting data directly from employees, including information on travel distance and mode.

The significant Scope 3 emission categories for OP Group are disclosed in the table above. The remaining categories are deemed insignificant for OP Group, either because the associated GHG emissions are not material based on their quantity or because there are no emissions to be reported based on OP Group's business model. The measurement of the figures has not been validated by any external body.

GHG intensity based on net revenue

	FY 2025
GHG intensity per net revenue (location based) (tCO ₂ eq/Revenue in mEUR)	30.96 tCO ₂ e/mEUR
GHG intensity per net revenue (market based) (tCO ₂ eq/ Revenue in mEUR)	5.51 tCO ₂ e/mEUR
Scope 2 GHG intensity per net revenue (tCO ₂ eq/ Revenue in mEUR)	1.29 tCO ₂ e/mEUR
Scope 3 GHG intensity per net revenue (tCO ₂ eq/ Revenue in mEUR)	330.45 tCO ₂ e/mEUR

Net revenue used to calculate GHG intensity	289,848 tEUR
Net revenue (other)	4,492 tEUR
Total net revenue (in financial statements)	294,420 tEUR

2.1.8 GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

OP Group has no greenhouse gas emissions associated with removals and storage, including transport and storage activities, within its own operations and value chain, and therefore has no emissions to report in this category.

2.1.9 Internal carbon pricing (E1-8)

OP Group does not apply an internal carbon price.

2.2 Water and marine resources (ESRS E3)

OP Group utilizes the clarifications and reliefs introduced by the Quick-Fix Delegated Act amending the first set of European Sustainability Reporting Standards (ESRS) for the topic of water to fulfill its reporting obligations efficiently and in compliance with CSRD requirements.

2.2.1 Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities (IRO-1)

OP Group applies a structured process to identify and assess impacts, risks and opportunities related to water and marine resources across its operations and value chain. This process is embedded in the annual ESG risk assessment and follows the double materiality principle.

The assessment begins with value chain mapping, which identifies upstream paper procurement as the primary area of relevance for water-related impacts. The analysis integrates internal procurement data, information on supplier practices and certification status, as well as external benchmarks and sector-specific guidance under ESRS E3. Identified impacts, risks and opportunities are evaluated based on their likelihood and severity over short-, medium- and long-term horizons.

Key water-related risks are associated with water consumption and potential water scarcity in regions where paper production takes place. Identified opportunities relate primarily to increasing the share of certified paper products and promoting closed paper cycles, thereby reducing water consumption in the upstream value chain.

OP Group does not conduct direct community consultations, as the Group does not operate in water-stressed or water-sensitive regions. Instead, OP Group relies on supplier engagement and recognised certification schemes, such as FSC® and PEFC®, which include requirements for stakeholder engagement and consideration of environmental impacts, including water-related aspects, at forest management and production level.

In line with the ESRS value-chain phase-in provisions and the Quick-Fix reliefs, OP Group currently discloses available information on upstream water-related impacts based on internal data, information obtained from key suppliers and publicly available databases. The Group will progressively enhance its assessment and expand value-chain coverage as data availability, supplier engagement and internal processes improve in future reporting periods.

Material IROs for water and marine resources

Sub-topic	IRO-Category		Scenario	Value chain location	Time Horizon	Origin within the value chain	Description
Water	Impact	(-)	Actual	Upstream	Short-, medium-, and long-term	Upstream	OP Group has a negative impact on local water systems due to requiring high volumes of paper for printing activities in its upstream value chain, which leads to significant water consumption during paper production.

2.2.2 Policies related to water and marine resources (E3-1)

Water and marine resources are currently not considered material in relation to OP Group's own operations, and OP Group therefore does not have dedicated policies addressing these topics at operational level. Identified upstream water-related impacts are primarily managed through supplier requirements and recognised certification schemes.

Should water or marine resources become material for OP Group's operations in the future, the materiality assessment will be reviewed, and relevant policies and measures will be considered within a reasonable timeframe. As part of its ongoing sustainability development and in line with

CSRD requirements, OP Group will, during 2026, further assess water consumption across its value chain to strengthen the identification of potential impacts, risks and dependencies.

2.2.3 Actions related to water and marine resources (E3-2)

OP Group addresses upstream water-related impacts primarily through responsible sourcing practices and the use of recognised certifications. FSC® and PEFC® certifications support sustainable forest management and responsible production practices, which contribute to mitigating water-related impacts associated with raw material sourcing.

In addition, OP Group promotes efficient use of paper resources, including measures to reduce overall paper consumption, increase the share of certified paper products, and support closed paper cycles where feasible. Within the current business model, these measures represent the most effective actions available to OP Group for managing water-related impacts in its upstream value chain.

2.2.4 Targets related to water (E3-3)

OP Group aims to steadily increase the share of products sourced from certified suppliers over time. This supports the reduction of water-related impacts and promotes improved water stewardship in the upstream value chain.

2.3 Resource use and circular economy (ESRS E5)

2.3.1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities (IRO-1)

As part of the double materiality assessment, OP Group assesses its assets and activities across the value chain, including the sourcing of paper, inks and printing equipment, internal production processes, logistics and distribution, and end-of-life handling of printed products. The assessment covers both OP Group's own operations and upstream and downstream value-chain activities relevant to resource use, circularity and waste generation.

The assessment is based on structured environmental risk analyses aligned with CSRD and EU Taxonomy requirements and incorporates principles from ISO 14001. It draws on supplier information, ESG-related questionnaires and audits, internal environmental monitoring and documentation, as well as data from logistics partners and relevant customer input. Sector-specific benchmarks for the printing and packaging industry are applied to support the identification of material impacts, risks and opportunities.

This process enables OP Group to identify key aspects related to material inflows, material efficiency, waste generation, recyclability and end-of-life outcomes, and provides the basis for prioritising mitigation measures, cleaner production initiatives and actions to improve circular material flows.

Stakeholder engagement related to resource use and circular economy topics is primarily conducted through indirect formats, consistent with OP Group's general stakeholder engagement approach. Affected communities are engaged through information channels such as newsletters, meetings and digital communication platforms.

Material IROs for resource use and circular economy

Sub-Topic	IRO-Category		Scenario	Time Horizon	Origin within the value chain	Description
Resource inflows, including resource use	Impact	(-)	Actual	Short-, medium-, and long-term	Upstream	OP Group has a negative impact on resource efficiency due to purchasing products containing plastic, aluminum, and textiles in its value chain, which leads to non-circular material inflows.
Resource outflows related to products and services	Impact	(-)	Actual	Short-, medium-, and long-term	Own business activities	OP Group has a negative impact on resource use due to printing high quantities of paper annually in its operations, which leads to high material consumption and significant resource outflows.
Waste	Impact	(-)	Actual	Short-, medium-, and long-term	Own business activities	OP Group has a negative impact on waste management due to generating non-recyclable waste during its operations, which leads to increased waste volumes and higher landfill disposal.
Waste	Impact	(-)	Actual	Short-, medium-, and long-term	Downstream	OP Group has a negative impact on post-consumer waste generation due to selling products such as LFP, paper products, and merchandise in its value chain, which leads to short product life cycles.

2.3.2 Policies related to resource use and circular economy (E5-1)

OP Group addresses its material impacts related to resource use and circularity primarily through its ESG Policy (see Chapters E1-2 for further information). The policy establishes overarching principles for responsible resource management by promoting the efficient use of materials, the reduction of paper consumption, the minimisation of waste, and the prioritisation of recycling and responsible waste management. It further encourages the sourcing of materials and products from sustainable origins where feasible and sets expectations for suppliers to adopt responsible and sustainable practices.

The ESG Policy supports circular-economy principles, particularly in relation to paper as the Group's main material input, by promoting closed paper cycles and the avoidance of unnecessary material use. Where waste generation cannot be avoided, the policy emphasises recycling and environmentally sound disposal in line with the waste hierarchy. Risks related to non-circular material inflows, including products containing plastic, aluminium, and textiles, are addressed through supplier engagement and the promotion of certified and more sustainable sourcing options.

More specific targets and performance ambitions related to resource use and circularity are defined as part of OP Group's sustainability statement and are disclosed under ESRS E5-3 (Targets related to resource use and circular economy). These include objectives related to



increasing the share of sustainably sourced and certified paper, reducing paper waste, and improving material efficiency across operations. While the transition away from the extraction of virgin non-renewable resources is not explicitly defined in the ESG Policy, OP Group's resource use is predominantly based on renewable materials, particularly paper. Operational practices such as the recycling of printing plates and inks, optimisation of production processes, and waste segregation contribute to improving circular material flows and reducing residual waste, thereby supporting the objectives of ESRS E5.

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

In 2024, OP Group initiated the systematic measurement of PVC content in selected packaging and product categories. In parallel, the Group engaged with suppliers to assess PVC usage and evaluated alternative materials based on defined performance, compliance, and suitability criteria. These actions supported entity-level initiatives aimed at improving waste management and enabling targeted material substitution.

In 2025, OP Group expanded its PVC-reduction initiatives across all entities. This included the phased removal of PVC from selected packaging materials through the use of alternative polymers such as PE, PET, PP, and LDPE, as well as offering PVC-free alternatives for relevant product categories. Standard product ranges, including banners and roll-ups, were updated accordingly. In addition, OP Group increased transparency towards customers by making material composition information available via its online platforms.

End-of-life actions

As part of its actions related to resource outflows and waste, OP Group assesses options to improve circularity through recyclability and responsible end-of-life solutions. In 2025, OP Group advanced its end-of-life action plan, focusing on material optimization, management of inks and chemicals, waste sorting and recycling, digital prepress optimization, monitoring and reporting, training, and the adoption of environmental certifications and additional policies. These actions aim to reduce resource consumption, improve recycling rates, minimize waste, enhance environmental performance, and leverage expert guidance to identify further actionable steps. The plan has been finalized and is being rolled out groupwide across product design units, ensuring consistent implementation and continuous progress.

Actions and resources related to resources inflows, including resource use

OP Group has established commitments related to material use and sourcing, with a particular focus on paper and selected non-paper materials. Key actions include sourcing paper from certified schemes and maintaining ongoing dialogue with suppliers to address materials subject to increased environmental and regulatory scrutiny, including PVC. These measures support a higher share of materials aligned with defined sustainability requirements and contribute to a gradual reduction of non-circular material inflows across the value chain. The scope covers the entire OP Group and is implemented in close collaboration with key suppliers to ensure consistent application across entities and supply chain partners.

Actions and resources related to resource outflows from products and services

OP Group's product portfolio primarily consists of paper-based products, which are characterised by a high degree of recyclability and compatibility with established paper recycling systems. Actions related to resource outflows therefore focus on maintaining and improving the circularity of products placed on the market, including material selection, product design, and the reduction of non-recyclable components.

Through the use of predominantly paper-based inputs and the gradual substitution of materials that hinder recyclability, such as PVC, OP Group aims to reduce non-circular resource outflows associated with its products at end-of-life. Standard product ranges have been reviewed and updated to support improved recyclability and material compatibility.

In addition, OP Group provides increased transparency on product material composition to support responsible use and disposal by customers. These actions address negative impacts related to resource outflows from products and services and support improved circularity at the end-of-life stage.

Actions and resources related to waste

OP Group addresses negative impacts related to waste generation through groupwide operational measures focusing on waste prevention, segregation, recycling, and monitoring. Recycling processes are applied across production facilities, with waste volumes monitored at both operational and management level. Key waste streams, including paper waste, printing plates, and inks, are integrated into established recycling streams to improve material efficiency and reduce total waste volumes. These actions mitigate negative impacts on resource use arising from high production volumes and associated material consumption and are continuously reviewed to support further reductions over time.

Waste management across OP Group is organised through certified external waste management partners, supported by group-wide activity-based tracking, standardised reporting templates and internal monitoring procedures. To strengthen waste management and data quality, OP Group implemented activity-based tracking of operational waste across all entities in 2025. The enhanced tracking provides more accurate insights into waste generation, supports targeted waste-reduction initiatives, and improves resource efficiency in line with policy objectives and sustainability targets. This action addresses negative impacts related to non-recyclable and residual waste generated during operations, which may otherwise increase disposal volumes and landfill use, underscoring the importance of consistent waste management across the Group.

At present, no additional actions beyond existing environmental management and mitigation measures are in place to provide, cooperate in, or support remedy for negative impacts on nature. OP Group remains committed to continuous improvement and will monitor developments to ensure that future actions align with evolving best practices for environmental stewardship and stakeholder engagement. All actions described are ongoing and embedded in OP Group's regular business operations.

2.3.4 Targets related to resource use and circular economy (E5-3)

OP Group has established voluntary targets aimed at strengthening circularity and improving resource efficiency across its operations. The targets focus on resource inflows and outflows by promoting material selection based on defined procurement and production criteria, improving recyclability, and reducing waste in line with circular-economy principles. Collectively, the targets aim to improve material efficiency and increase the circulation of materials throughout their lifecycle.

The targets primarily address negative impacts associated with material consumption by prioritising sustainably sourced paper and by enhancing recyclability at both product and operational level. While the targets do not explicitly address the minimisation of primary raw material extraction or apply the cascading principle for renewable resources, they emphasise certified sourcing, responsible material use, and improved end-of-life outcomes through enhanced recyclability

For each disclosed target, the relevant layer of the waste hierarchy is as follows:



As illustrated in the figure, OP Group's targets primarily address the Reduce, Recycle, and Recover levels of the waste hierarchy. This reflects a focus on reducing paper waste during production, increasing the share of sustainably sourced paper as material input, and improving the recyclability of packaging materials and products placed on the market. The mapping provides a structured overview of how individual targets support a gradual reduction of non-circular material flows, while acknowledging the operational and market constraints associated with product design and material choices.

Overall, the targets aim to increase the share of sustainable material inputs and reduce non-circular material outputs by optimising material selection, product design, and waste management practices. For each disclosed target, the relevant level of the waste hierarchy is specified.

In the following sections, the targets are presented in detail across three key areas: resource inflows, including resource use; resource outflows related to products and services; and waste management.

Common characteristics applicable to all targets

The achievement of all targets is anchored in OP Group's ESG Policy, ensuring alignment with the Group's broader sustainability strategy. All targets are absolute, expressed as percentages, and measured against a 2025 baseline, with completion planned by the end of 2026. Each entity achieving the defined target is considered a milestone, supporting progress across the Group.

Performance is benchmarked across consolidated OP Group entities, and deviations are analysed to identify improvement opportunities. Targets were primarily defined at group level and communicated across all business units to ensure awareness and alignment. Direct stakeholder involvement in defining the targets was limited. However relevant internal functions including procurement, ESG, and operations were consulted to confirm feasibility. Customer feedback informed implementation, as cost sensitivity required balancing sustainability objectives with market expectations. In addition, supplier input was considered through discussions on material availability to ensure that targets reflect practical and regional conditions.

There were no changes to targets, metrics, or methodologies during the financial year 2025.

Targets related to resources inflows, including resource use

OP Group has established measurable, outcome-oriented and time-bound targets for sustainable paper sourcing: In 2026 OP Group aims to maintain sourcing more than 95% of its paper certified under FSC®, PEFC® and the Nordic Swan Ecolabel. At group level, this target was fully achieved in the reporting year.

The target covers group-wide sourcing for activities and products, including the upstream supply chain. It is based on internationally recognised standards such as FSC® and PEFC® and aligned with EU policy frameworks, including the Circular Economy Action Plan and the EU Deforestation Regulation. Actions to source certified materials are directly linked to this target and contribute to an increased circular material use rate.

The target measures the share of paper sourced from certified suppliers in line with FSC®, PEFC®, or Nordic Swan standards. Compliance is verified through third-party supplier audits and chain-of-custody documentation using data from procurement systems and certification records. Key assumptions include sufficient market availability of certified paper and supplier compliance with the EU Deforestation Regulation. No external scenario modelling has been applied, as the target is based on established procurement practices and supplier engagement. The approach contributes to EU policy objectives on deforestation-free supply chains and contributes to SDG 12 on Responsible Consumption and Production. It also considers the wider context by promoting sustainable forestry and biodiversity protection, while reflecting local market conditions such as price sensitivity, which influenced the ability to meet the target.

Targets related to resource outflows from products and services

OP Group has committed to measurable, outcome-oriented, and time-bound voluntary targets related to the recyclability of packaging materials used within its operations. By 2026, OP Group aims to maintain that 94% of packaging materials are recyclable, as defined at the time the target was established. The target primarily focuses on paper- and cardboard-based packaging materials, reflecting the Group's core material flows and main packaging volumes.

In the reporting year 2025, progress against the target is estimated at **90% at Group level**, based on a consolidated Group assessment. Variations in packaging composition and operational practices across entities are reflected in this estimate.

In parallel, OP Group continuously reviews the overall recyclability of all packaging materials placed on the market. Based on the material composition used in 2025, 100% of packaging materials were recyclable, as the Group exclusively used cardboard boxes, paper-based filling materials, and plastic packaging components made from PP, PE, PET and LDPE, with no use of PVC. This assessment provides additional transparency on end-of-life outcomes but does not replace the defined target boundary.

The target applies group-wide and is grounded in recognised recyclability criteria under the EU Packaging and Packaging Waste Directive. OP Group assesses compliance through material audits, supplier specifications, and packaging design reviews. Recyclability is evaluated using internal procurement and production data, supported by supplier documentation and waste audits. No external scenario modelling has been applied, as progress is driven by operational improvements and supplier engagement.

Targets related to waste

OP Group has set measurable, outcome oriented, and timebound targets to reduce waste generated from paper input during production. By 2030, OP Group aims to reduce paper waste to below 25%. In the reporting year 2025, paper waste amounted to **27.3% at Group level**, calculated based on consolidated Group data.

Although operational waste tracking is not directly linked to the resource use and circular-economy targets, it provides a critical baseline for monitoring material flows and identifying improvement opportunities. This enables targeted actions to reduce waste generation and enhance circularity over time and supports appropriate waste treatment and management.

The scope of this target covers group-wide printing processes within OP Group's own operations. The target is not based on established scientific models but reflects operational efficiency improvements. It measures the ratio of paper waste generated during production relative to total paper input, expressed as a percentage, using the following calculation:

$$\text{Waste Percentage} = (\text{Paper Waste} / \text{Total Paper Input}) \times 100$$

Data is sourced from internal production and waste reporting systems at group level. Key assumptions include that all recorded paper waste is attributable to production processes and that total paper input includes all paper entering production. Where data is unavailable, placeholder values may be applied. No external scenario modelling has been used. The target reflects the operational context in which paper represents a significant material input.

2.3.5 Resource inflows (E5-4)

In the current reporting period, OP Group applies the value-chain phase-in provision under ESRS 1 paragraph 133(b). Accordingly, OP Group does not yet disclose a full set of quantitative upstream and downstream value-chain inflow metrics, except where required under other EU legislation.

OP Group's main resource inflows include paper, packaging materials, printing inks and other consumables, and property, plant and equipment used in printing operations. Paper is the key material input, while packaging consists mainly of cardboard and other paper-based materials. Printing inks and printing plates are used as process-specific consumables and are managed through supplier specifications and production controls. Printing plates are classified as operational consumables related to printing equipment rather than as standalone capital equipment. Critical raw materials and rare earth elements are not significant. Water use is primarily concentrated in upstream paper production rather than in OP Group's own operations.

Resource inflow data is based on direct measurement where available and estimation methods where necessary, including spend-based estimation for packaging materials. Materials are reported in their original state at delivery. As products are designed for recycling rather than reuse, there is no overlap between reused and recycled material categories.

While quantitative inflow volumes are subject to phase-in provisions, outcome-oriented targets related to resource inflows, such as certified paper sourcing, are disclosed under E5-3 and are based on procurement and certification data rather than material mass.

2.3.6 Resource outflows (E5-5)

OP Group's key products consist primarily of paper-based materials, which are designed for recycling within established circular systems. During the reporting period, OP Group initiated internal discussions on eco-design principles to explore opportunities for integrating additional circular strategies, such as durability, reusability and design for disassembly, into the existing product portfolio.

Rates of recyclable content in products and packaging

	Information about key products and materials
The rates of recyclable content in product packaging	100%

Waste generation, recycling and disposal

OP Group discloses information on waste generated in its own operations in accordance with ESRS E5. The main waste streams arise from paper offcuts, packaging materials, and residual operational waste. Due to the use of chemicals and inks in certain production processes, a limited amount of hazardous waste is generated.

Relevant waste streams for OP Group include cleaning solvents and VOC-containing residues from press cleaning and ink maintenance, wastewater from plate processing and machine cleaning, faulty prints, lamination waste, used rags, filters and PP&E contaminated with inks or solvents, and obsolete films and photopolymer plates from pre-press processes. Waste materials include paper, plastics, metals, glass, rags, filters, PP&E and photopolymer materials.

Amounts of waste generation, disposal and recycling

Information on its total amount of waste from its own operations, in tons:	
Total amount of waste generated in own operations for the reporting year	13,839.58
Total amount of hazardous waste by weight diverted from disposal	45.79
<ul style="list-style-type: none"> Total amount of hazardous waste by weight diverted from disposal by preparing for reuse 	3.74
<ul style="list-style-type: none"> Total amount of hazardous waste by weight diverted from disposal through recycling by external operators 	4.60
<ul style="list-style-type: none"> Total amount of hazardous waste by weight diverted from disposal through other recovery operations by external operators 	41.19
Total amount of non-hazardous waste by weight diverted from disposal	13,509.34
<ul style="list-style-type: none"> Total amount of non-hazardous waste by weight diverted from disposal by preparing for reuse by external operators 	34.30
<ul style="list-style-type: none"> ii. Total amount of non-hazardous waste by weight diverted from disposal through recycling by external operators 	7,399.61
<ul style="list-style-type: none"> iii. Total amount of non-hazardous waste by weight diverted from disposal through other recovery operations by external operators 	903.85
Disclose the total amount of hazardous waste by weight directed to disposal	4.68
<ul style="list-style-type: none"> Amount of hazardous waste by weight directed to disposal by incineration by external operators 	0
<ul style="list-style-type: none"> Amount of hazardous waste by weight directed to disposal by landfill by external operators 	0
<ul style="list-style-type: none"> Amount of hazardous waste by weight directed to disposal by other disposal operations by external operators 	0
Disclose the total amount of non-hazardous waste by weight directed to disposal	234.07
<ul style="list-style-type: none"> Amount of non-hazardous waste by weight directed to disposal by incineration by external operators 	0
<ul style="list-style-type: none"> Amount of non-hazardous waste by weight directed to disposal by landfill by external operators 	234.07
<ul style="list-style-type: none"> Amount of non-hazardous waste by weight directed to disposal by other disposal operations by external operators 	0
Total amount of non-recycled waste	825.28
<i>Percentage of non-recycled waste by external operators</i>	<i>5.73%</i>

Total amount of hazardous waste generated by the undertaking

The total amount of hazardous waste generated by OP Group's own operations in the reporting year amounted to 50.47 tonnes. Of this amount, 45.79 tonnes were diverted from disposal through recovery operations, including preparation for reuse, recycling and other recovery methods, while 4.68 tonnes were directed to disposal. Hazardous waste management follows applicable regulatory requirements and prioritises diversion from disposal where technically and operationally feasible.

Metrics used to evaluate performance and effectiveness related to material waste impacts

OP Group evaluates the performance and effectiveness of its waste management practices using a set of quantitative waste-related metrics. These include the total amount of waste generated, the amount and share of waste diverted from disposal, the amount of waste directed to disposal, and the percentage of non-recycled waste in own operations.

In the reporting year, OP Group generated 13,839.58 tonnes of total waste, of which the vast majority was diverted from disposal through recycling, preparation for reuse or other recovery operations. Non-recycled waste amounted to 825.28 tonnes, corresponding to 5.73% of total waste generated.

These metrics are used to monitor progress over time, identify opportunities to further reduce waste generation and disposal, and support continuous improvement of waste handling and circularity practices across operations.

Waste-related data is calculated in accordance with the methodologies, criteria and assumptions set out in ESRS E5. Data is primarily sourced from direct measurement. The measurement of the figures has not been validated by an external body.

Product design and circularity considerations

OP Group designs its printed products to meet or exceed industry durability standards. While many products could last significantly longer if stored and handled with care, their intended use period is typically short, particularly for marketing materials with campaign-driven lifecycles. OP Group's products are not designed for repair.

OP Group continues to explore opportunities to improve material efficiency and integrate circular design principles, with a focus on recyclability and waste reduction.

2.4 EU Taxonomy Disclosures

For the 2025 financial year, OP Group's EU Taxonomy reporting has been prepared in accordance with Delegated Regulations (EU) 2021/2178, (EU) 2021/2139 and (EU) 2023/2486, as amended and applicable as of 31 December 2025. OP Group has not applied the amendments introduced by Delegated Regulation (EU) 2026/73 for the 2025 reporting period, in line with the optional transitional provisions allowing undertakings to opt out of the application of these amendments for financial years beginning between 1 January and 31 December.

The EU Taxonomy Regulation (EU) 2020/852 of the European Parliament and the Council of June 18, 2020, on the establishment of a framework to facilitate sustainable investment is a key

component of the European Commission's action plan to redirect capital flows towards a more sustainable economy. It represents an important step towards achieving carbon neutrality by 2050 in line with EU climate goals, because the Taxonomy is a classification system for environmentally sustainable economic activities.

The EU Taxonomy requires companies to review and evaluate whether and to what extent their activities fall under the definition of “environmentally sustainable activities”. Six environmental objectives have been defined by the EU for this purpose: (1) climate change mitigation, (2) climate change adaptation, (3) sustainable use and protection of water and marine resources, (4) transition to a circular economy, (5) pollution prevention and control, and (6) protection and restoration of biodiversity and ecosystems.

An economic activity is a Taxonomy-eligible economic activity if it is described in one of the delegated acts supplementing the Taxonomy Regulation, the Climate Delegated Act (hereafter CDA) and its amendment², the Complementary Delegated Act on Gas and Nuclear Activities³ and the Environmental Delegated Act⁴ (hereafter EDA), irrespective of whether that economic activity meets any or all the technical screening criteria (hereafter TSC) laid down in those delegated acts.

An economic activity is Taxonomy-aligned where it complies with the TSC as defined in the delegated acts. To meet the TSC, an economic activity must contribute substantially to one or more environmental objectives while not doing significant harm (DNSH) to any of the other environmental objectives and complying with the minimum safeguards regarding human and consumer rights, anti-corruption and bribery, taxation, and lawful competition. These relate to recognized frameworks such as the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

The EU Taxonomy regulation focuses primarily on sectors that can make a substantial contribution and whose transformation therefore has a material influence on achieving the stated targets.

The economic activities covered under the EU Taxonomy until now do not cover OP Group's core business activities. Given the dynamic regulatory development, OP Group expect that further economic activities will be covered by the EU Taxonomy in the future, which might allow us to report more comprehensively.

2.4.1 Identification of Taxonomy-eligible activities

OP Group has examined all of OP Group's business activities to identify the Taxonomy-eligible activities in accordance with the Annexes to the CDA, EDA and Complementary Delegated Act on Gas and Nuclear Activities. Multiple departments were consulted during the assessment to ensure all OP Group business activities are covered.

² The Climate Delegated Act ([EU Regulation 2021/2139](#)) defines the criteria for evaluating whether an economic activity makes a substantial contribution to “climate change mitigation” or “climate change adaptation” and was amended in 2023 by [EU Regulation 2023/2485](#) which modified the existing technical screening criteria and added further climate-related economic activities. A consolidated version of the CDA including the amendment is available on the [Website of the European Commission](#).

³ The Complementary Delegated Act on Gas and Nuclear Activities ([EU Regulation 2022/1214](#)) defines the criteria for evaluating whether a gas or nuclear economic activity makes a substantial contribution to “climate change mitigation” or “climate change adaptation”.

⁴ The Environmental Delegated Act ([EU Regulation 2023/2486](#)) defines the criteria for evaluating whether an economic activity makes a substantial contribution to the „sustainable use and protection of water and marine resources”, “transition to a circular economy”, “pollution prevention and control”, and “protection and restoration of biodiversity and ecosystems”.



The overview below indicates our activities which qualify as Taxonomy-eligible. Our activities contribute to the environmental objectives of climate change mitigation and the transition to a circular economy. If an activity is Taxonomy-eligible under multiple environmental objectives, it is reported accordingly under multiple environmental objectives, with the share of the respective KPI reported for the most relevant environmental objective to avoid double counting. If applicable, the alignment assessment is performed for all environmental objectives. This is also reflected in the additional KPI tables from page 45 onwards.

OP groups core activities are currently not covered by the EU Taxonomy, and OP Group thus does not perform any material Taxonomy-eligible turnover-generating activities. However, OP Group has identified the following material Taxonomy-eligible activities in terms of CapEx which are not directly related to our product and service portfolio:

- Activity CCM 5.5./ CE 2.3. “Collection and transport of non-hazardous waste in source segregated fractions”
- Activity CCM 6.5. “Transport by motorbikes, passenger cars and light commercial vehicles”
- Activity CCM 7.2./ CE 3.2. “Renovation of existing buildings”
- Activity CCM 7.6. “Installation, maintenance and repair of renewable energy technologies”
- Activity CCM 7.7. “Acquisition and ownership of buildings”
- Activity CE 1.2. “Manufacture of electrical and electronic equipment”

Beyond these activities, no further Taxonomy-relevant activities in relation to Annexes I, II, III, and IV of Regulation (EU) 2020/852 were identified. OP Group does not perform any gas or nuclear related economic activities as described in Delegated Regulation 2022/1214 of the EU Commission.

2.4.2 Alignment assessment

To evaluate whether the identified Taxonomy-eligible activities are Taxonomy-aligned and thus sustainable according to the EU Taxonomy, the TSC were assessed individually per economic activity.

The assessment of the criteria for making a substantial contribution to climate change mitigation and the transition to a circular economy was conducted at activity level. The assessment of the DNSH-criteria was performed at site level for Appendix A (climate risk assessment), Appendix B and Appendix D of the CDA and activity level for Appendix C. The compliance with the minimum safeguards was assessed at company level.

For this financial year none of the identified EU Taxonomy-eligible activities fulfilled the respective substantial contribution and/or DNSH-criteria, therefore the reported share of alignment amounts to 0.

2.4.3 KPIs

The key performance indicators (KPIs) include the turnover KPI, the CapEx KPI and the OpEx KPI. The specification of the KPIs is determined in accordance with Annex I to the Disclosures Delegated Act ([EU Regulation 2021/2178](#)). In the following, OP Group describes how they determine the Taxonomy-eligible KPIs in accordance with the legal requirements and describe our accounting policy in this regard.

2.4.4 Process for data collection and validation

The data collection process was led by our global controlling and sustainability department and supported by our local controlling teams as well as other stakeholders where needed.

Turnover

The denominator of the turnover KPI is based on our consolidated net turnover in accordance with paragraph 82(a) of IAS 1. The numerator of the turnover KPI is defined as the net turnover derived from products and services associated with Taxonomy-aligned economic activities and thus equal to zero for financial year 2025.

CapEx

The CapEx KPI is defined as Taxonomy-eligible / -aligned CapEx (numerator) divided by our total CapEx (denominator).

Total CapEx consists of additions to tangible and intangible fixed assets during the financial year, before depreciation, amortization, and any remeasurements, including those resulting from revaluations and impairments, and excluding goodwill and changes in market-based financial measurement basis. It includes acquisitions of tangible fixed assets (IAS 16), intangible fixed assets (IAS 38), right-of-use assets (IFRS 16), and investment properties (IAS 40) as well as additions resulting from business combinations.

Our total CapEx can be reconciled to our consolidated financial statements and consists of additions to intangible assets, right-of-use assets, property, plant and equipment, and investment properties including additions resulting from business combinations.

The numerator of the CapEx KPI relates to investments into electrical and electronic devices and IT hardware, such as printers under activity CE 1.2. Manufacture of electrical and electronic equipment, the OP Group's acquisition of buildings as well as property leases recognized under IFRS 16 tied to activity CCM 7.7. Acquisition and ownership of buildings, the acquisition and leasing of vehicles (all types) recognized under IFRS 16 related to CCM 6.5. Transport by motorbikes, passenger cars and light commercial vehicles, investments tied to CCM 7.2. / CE 3.2 renovation of existing buildings, investments into paper extraction machines related to CCM 5.5 / CE 2.3 "Collection and transport of non-hazardous waste in source segregated fractions" as well as investments into solar panels under CCM 7.6. Installation, maintenance and repair of renewable energy technologies.

In the table below, a breakdown of the amounts of CapEx included in the numerator is shown. No investments as part of a CapEx plan were incurred in financial year 2025.

Table 1: Quantitative breakdown of the CapEx numerator ("Consolidated Statement of Changes in Non-current Assets" in the consolidated financial statements)

	CapEx (TEUR)
Additions to Plant, Property and Equipment (PP&E)	7,813
Additions to Intangible Assets	13,778
Right-of-use assets	8,960
TOTAL	30,551

OpEx

The OpEx KPI is defined as Taxonomy-aligned OpEx (numerator) divided by our total OpEx (denominator).

Total OpEx consists of direct non-capitalised costs that relate to research and development, building renovation measures, short-term leases as well as all forms of maintenance and repair. This includes:

- Research and development expenditure recognised as an expense during the reporting period in our income statement.
- non-capitalised leases in accordance with IFRS 16 which includes expenses for short-term leases and low-value leases.
- Maintenance and repair expenditures were determined based on the maintenance and repair costs allocated to our internal cost centres. This also includes non-capitalized building renovation measures and other direct expenditure relating to day-to-day servicing of assets of PP&E.

In general, this includes staff costs, costs for services and material costs for daily servicing, as well as for regular and unplanned maintenance and repair measures. These costs are directly allocated to our PP&E. This does not include expenditures relating to the day-to-day operation of PP&E, such as raw materials, cost of employees operating the machinery, electricity or fluids that are necessary to operate PP&E. Amortisation and depreciation are also not included in the OpEx KPI.

In the context of our business model, which focuses on online printing services with automated fulfilment and shipping, OP Group considers the Taxonomy OpEx KPI denominator value to be insignificant in comparison to our company OpEx. Consequently, and in line with the provisions of the Disclosures Delegated Act under §1.1.3.2., OP Group reports the numerator value of our Taxonomy-eligible OpEx KPI as zero.

2.4.5 KPI Tables

Our Taxonomy KPIs are presented in the respective templates provided in Annex II to the Disclosures Delegated Act.

OP Group is currently not performing any of the activities related to natural gas and nuclear energy (activities CCM 4.26-4.31) as indicated in table 4, OP Group is not using the dedicated templates introduced by the Complementary Climate Delegated Act as regards activities in certain energy sectors.

Proportion of Taxonomy-eligible and Taxonomy-aligned Turnover⁵

Financial year N	Year			Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')										
	Economic activities (1)	Code (2)	Turnover (3)	Proportion of turnover, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity and ecosystems (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1) or enabling activity (19)	Category	
Text		In TEUR	%	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	Y	0%		
Of which Enabling		0	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	Y	0%		
Of which Transitional		0	0%	0%						Y	Y	Y	Y	Y	Y	Y	Y	0%		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
				EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL											
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0%	0%	0%	0%	0%	0%	0%									0%		
A. Turnover of Taxonomy eligible activities (A1 + A2)		0	0%	0%	0%	0%	0%	0%	0%									0%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
Turnover of Taxonomy-non-eligible activities		289,848	100																	
Total		289,848	100																	

⁵ All amounts under €500 have been rounded down to zero and all amounts from €500 have been rounded up to 1 TEUR. Rounding differences may occur.

Proportion of Taxonomy-eligible and Taxonomy-aligned capital expenditure⁵

Financial year N	Year			Substantial Contribution Criteria						DNSH ('Does Not Significantly Harm') criteria									
	Code (2)	CapEx (3)	Proportion of CapEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity and ecosystems (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year N	Category enabling activity (19)	Category transitional activity (20)
Text	In TEUR	%		Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y;N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)	0	-								Y	Y	Y	Y	Y	Y	Y	0%		
Of which Enabling	0	-								Y	Y	Y	Y	Y	Y	Y	0%		
Of which Transitional	0	-								Y	Y	Y	Y	Y	Y	Y	0%		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Collection and transport of non-hazardous waste in source segregated fractions	CCM 5.5 / CE 2.3	480	1.57	EL	N/EL	N/EL	N/EL	EL	N/EL										
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	837	2.74	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Renovation of existing buildings	CCM 7.2 / CE 3.2	400	1.31	EL	N/EL	N/EL	N/EL	EL	N/EL								0%		
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	417	1.36	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Acquisition and ownership of buildings	CCM 7.7	4,183	13.69	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Manufacture of electrical and electronic equipment	CE 1.2	9,628	31.52	N/EL	N/EL	N/EL	N/EL	EL	N/EL								0%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	15,948	52.20	20.69 %	0%	0%	0%	0%	31.52 %	0%								0%		
A. CapEx of Taxonomy eligible activities (A1 + A2)	15,948	52.20	20.69 %	0%	0%	0%	0%	31.52 %	0%								0%		0%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities	14,603	47.80																	
Total	30,551	100																	

Proportion of Taxonomy-eligible and Taxonomy-aligned operating expenditure^{6,7}

Financial year N	Year			Substantial Contribution Criteria						DNSH criteria ('Does Not Significantly Harm')									
	Economic activities (1)	Code (2)	OpEx (3)	Proportion of OpEx, year N (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity and ecosystems (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity and ecosystems (16)	Minimum Safeguards (17)	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, (18)	Category enabling activity (19)
Text	IN	TEUR	%	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y;N;N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)	0	0%	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%		
Of which Enabling	0	0%	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%		
Of which Transitional	0	0%	0%							Y	Y	Y	Y	Y	Y	Y	0%		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL	EL;N/EL										
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	0	0%	0%	0%	0%	0%	0%	0%	0%								0%		
A. OpEx of Taxonomy eligible activities (A1 + A2)	0	0%	0%	0%	0%	0%	0%	0%	0%								0%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy-non-eligible activities	11,748	100																	
Total	11,748	100																	

⁶ Regarding the operating expenditures, OP Group makes use of the exemption clause in Annex I of the Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 and does not report the numerator for operating expenses.

⁷ All amounts under €500 have been rounded down to zero and all amounts from €500 have been rounded up to 1 TEUR. Rounding differences may occur.

Contribution to the environmental objectives of the EU Taxonomy - Turnover

	Proportion of turnover / Total turnover ⁸	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	0 %	0 %
CCA	0 %	0 %
WTR	0 %	0 %
CE	0 %	0 %
PPC	0 %	0 %
BIO	0 %	0 %

Contribution to the environmental objectives of the EU Taxonomy - capital expenditure

	Proportion of CapEx / Total CapEx	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	0 %	20.69%
CCA	0 %	0 %
WTR	0 %	0 %
CE	0 %	31.52 %
PPC	0 %	0 %
BIO	0 %	0 %

Contribution to the environmental objectives of the EU Taxonomy - operating expenditure

	Proportion of OpEx / Total OpEx	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	0 %	0 %
CCA	0 %	0 %
WTR	0 %	0 %
CE	0 %	0 %
PPC	0 %	0 %
BIO	0 %	0 %

⁸ The code signifies the abbreviation of the individual objective to which the economic activity can make a substantial contribution, which is: Climate change mitigation: CCM, Climate change adaptation: CCA, Water and marine resources: WTR, Circular economy: CE, Pollution prevention and control: PPC, Biodiversity and ecosystems: BIO

3. Social Information

3.1 Own Workforce (ESRS S1)

3.1.1 Interests and views of stakeholders: Own workforce (SBM-2)

OP Group considers its workforce a key stakeholder group and actively integrates employee perspectives into business decisions. Employee views are collected through regular engagement activities, including surveys, workshops, and ongoing dialogue with employee representatives. These inputs are systematically considered in strategic and operational decision-making.

By embedding workforce perspectives into its strategic initiatives, OP Group fosters an inclusive workplace culture aligned with its values of transparency and collaboration. This approach supports the Group's ESG ambitions and contributes to long-term trust between employees and the organization.

3.1.2 Material impacts, risks and opportunities related to OP Group's own workforce (SBM-3)

OP Group systematically identifies and reviews material impacts, risks, and opportunities related to its own workforce, including both employees and non-employee workers whose work is controlled by OP Group. The assessment covers workers engaged under permanent, temporary, and self-employed arrangements and focuses on impacts arising from the Group's own operations and business practices.

As part of the materiality assessment process, OP Group specifically considered people in its workforce who may be more vulnerable due to particular characteristics, such as age, gender, migration status, or specific work contexts and activities. Based on this assessment, OP Group has not identified material impacts, risks, or opportunities that relate exclusively to specific groups of people rather than to the workforce as a whole. This conclusion is informed by employee surveys, HR data, and ongoing dialogue with employee representatives.

To ensure a comprehensive understanding of workforce-related matters, OP Group regularly monitors workplace culture and employee satisfaction through annual employee surveys, analysis of workforce-related data, and continuous engagement with relevant stakeholders. These processes support the identification and management of material workforce-related impacts.

OP Group identifies a positive impact from its ongoing efforts to promote part-time working models and regulate overtime. These measures support fair working time arrangements and mitigate risks associated with excessive working hours, thereby improving working conditions for both employees and non-employee workers.

As a result of this positive impact, OP Group also identifies a material opportunity to further enhance working conditions across its operations. This opportunity is expected to contribute to higher long-term employee productivity, reduced sickness absence, and lower future operating costs. In addition, maintaining a high level of workforce diversity is identified as a material opportunity, as it is expected to strengthen employee commitment, reduce staff turnover, support the retention of talent and knowledge, and contribute to operational efficiency.

Material impacts, risks, and opportunities related to the workforce are assessed through regular materiality reviews and annual employee surveys, with results informing strategic decisions at senior management level.

Material IRO's for own workforce:

Sub-topic	IRO-Category		Scenario	Time Horizon	Position in the value chain	Description
Working conditions	Opportunity		Potential	Short-, medium-, and long-term	Own business activities	OP Group has an opportunity to improve working conditions in its operations, which could lead to higher long-term employee productivity, reduced absence leaves, and lower future operating costs.
Working conditions	Impact	(+)	Actual	Short-, medium-, and long-term	Own business activities	OP Group has a positive impact on working conditions by promoting part-time models and regulating overtime in its workforce, which leads to fair working time arrangements and reduces the risk of excessive working hours.
Equal treatment and opportunities for all: Diversity	Opportunity		Potential	Short-, medium-, and long-term	Own business activities	OP Group has an opportunity to maintain a high level of workforce diversity in its operations, which could lead to increased employee commitment, lower staff turnover, retention of talent and knowledge, and ultimately reduced operating costs.

3.1.3 Policies related to OP Group's own workforce (S1-1)

Overarching policies

OP Group's ESG Policy and Code of Conduct establish the overarching framework for ethical conduct, sustainability, and responsible treatment of employees across the Group.

The **ESG Policy** sets out OP Group's commitments to fair and responsible treatment of employees, respect for human and labour rights, and the provision of safe and healthy working conditions. It emphasizes the importance of an inclusive working environment that promotes diversity, equal opportunities, and respect, and it reflects the Group's ambition to create a positive social impact through its own operations. The policy further highlights OP Group's commitment to employee well-being, data protection, and respect for privacy, as well as its support for social initiatives and non-profit organisations.

Within the ESG Policy, OP Group commits to observing fundamental workers' rights and to avoiding any involvement in human rights violations. These commitments apply across all entities of the Group and are embedded in the company's approach to responsible business conduct. Employee satisfaction and workplace culture are assessed through regular staff surveys, which support continuous improvement of working conditions and employee engagement.

The **Code of Conduct** complements the ESG Policy by defining clear standards for ethical, legal, and professional behaviour applicable to all employees, managers, and executives across all



subsidiaries. It is binding at all organisational levels and serves as a practical guide for daily conduct. The Code of Conduct emphasizes equal treatment of all employees, including those working part-time or on fixed-term contracts, and explicitly prohibits discrimination, harassment, and any form of unequal treatment.

The Code of Conduct establishes expectations related to workplace behaviour, health and safety, confidentiality, data protection, and compliance with applicable laws and regulations. It promotes a culture of integrity, respect, and accountability, and includes clear guidance on ethical business practices, responsible use of company resources, and protection of the Group's reputation.

OP Group has implemented a whistleblowing framework as part of its governance structure, enabling employees and other stakeholders to report concerns related to misconduct, legal violations, discrimination, harassment, or human rights issues. Reports can be submitted confidentially and, where applicable, anonymously. The whistleblowing process includes defined timelines for acknowledgement, investigation, feedback, and follow-up, and ensures protection against retaliation. Identified violations may result in corrective, disciplinary, or legal actions, depending on the nature and severity of the case.

Both the ESG Policy and the Code of Conduct are aligned with internationally recognised principles, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the International Labour Organization's core labour standards. These frameworks inform OP Group's commitments to labour rights, freedom of association, non-discrimination, occupational health and safety, and ethical conduct.

Together, the ESG Policy and Code of Conduct provide a coherent and group-wide policy framework that supports responsible workforce management, safeguards employee rights, and promotes ethical and sustainable business practices throughout OP Group's operations.

Specific additions to overarching policies

In addition to its overarching ESG Policy and Code of Conduct, OP Group has established more specific policy elements addressing diversity, equal opportunities, and occupational health and safety within its own workforce.

Principles related to diversity, equity, and inclusion are embedded within the Code of Conduct. The Code sets out OP Group's commitment to equal opportunities and equal treatment for all employees and applicants, regardless of gender, age, nationality, religion, sexual orientation, disability, or other protected characteristics. It explicitly applies these principles to employees working under different contractual arrangements, including part-time and fixed-term contracts, and establishes a zero-tolerance approach to discrimination and harassment. The Code further defines expectations for respectful workplace behaviour and outlines procedures for handling complaints related to unequal treatment or harassment.

Occupational health and safety is addressed through a binding, group-wide health and safety framework, as outlined in the ESG Policy and reinforced by the Code of Conduct. OP Group commits to providing safe and healthy working conditions and requires all employees to comply with applicable health and safety policies, procedures, and instructions, including the use of personal protective equipment where required. Compliance with health and safety requirements is supported by internal guidelines, training, and monitoring processes, as well as recognised audit frameworks applied within parts of the Group's operations.

Together, these specific policy elements complement the overarching ESG Policy and Code of Conduct by providing clearer guidance on key social topics relevant to OP Group's own workforce. They support consistent application of principles related to equal treatment, inclusion, and occupational safety across all entities of the Group and form part of OP Group's overall framework for responsible workforce management.

General information for policies above

The scope of OP Group's ESG Policy, Code of Conduct, and related workforce-related policies is group-wide and applies to all employees, managers, and executives at every level across all subsidiaries of OP Group.

Oversight of the ESG Policy is the responsibility of the group-wide ESG Steering Committee, with support from Executive Management. The ESG Steering Committee is responsible for the strategic direction of ESG-related matters, including workforce-related topics addressed under ESRS S1. Executive Management is accountable for the implementation of the Code of Conduct and for ensuring that its principles are applied consistently across the Group.

The ESG Steering Committee convenes on a regular basis to review the relevance and effectiveness of the ESG Policy and related frameworks. As part of this process, the committee engages with relevant internal stakeholders, including Human Resources, entity-level teams, and Executive Management, to ensure that workforce-related considerations and stakeholder interests are reflected in the management of material sustainability matters.

OP Group has not committed to specific external standards or certification schemes beyond the international principles referenced in its policies. The Group's approach to workforce-related policies is based on internally developed frameworks and guidelines that are aligned with OP Group's values, applicable legal requirements, and internationally recognised principles.

All relevant policies are made accessible to employees and other stakeholders through multiple channels to ensure transparency and awareness. These include publication on the company website, inclusion in ESG reporting materials, availability of printed copies at operational sites, and distribution during employee onboarding. In addition, the Code of Conduct and related information are communicated through internal channels such as social areas, digital screens, internal social media groups, and intranet platforms, depending on local arrangements within the Group.

To support understanding and practical application of the policies, OP Group provides guidance materials and workplace procedures addressing topics such as respectful conduct, harassment, and bullying. These are supported by local management and designated employee or work environment representatives, ensuring that employees have access to information and support related to policy implementation.

3.1.4 Processes for engaging with own workforce and worker's representatives (S1-2)

OP Group engages with its own workforce through a range of processes aimed at supporting dialogue, gathering feedback, and informing decision-making on workforce-related matters. These processes enable employees to share perspectives on working conditions, well-being, and sustainability-related topics and support the management of actual and potential impacts on the workforce.



Employee engagement takes place through multiple channels, including regular employee satisfaction surveys, opportunities to submit suggestions under the Code of Conduct, and ongoing dialogue between employees and management. Engagement formats include Town Halls, All-Hands meetings, leadership updates, and regular team or one-on-one meetings. The format and frequency of these engagements are adapted to local needs and organisational contexts.

OP Group applies proactive processes to identify workplace-related challenges at an early stage. Sickness absence is monitored, and structured sickness absence dialogues are conducted with employees who have accumulated more than five sick days. These dialogues aim to identify underlying causes, provide appropriate support, and reduce the risk of prolonged absenteeism.

Responsibility for workforce engagement lies with senior management, including C-level executives, who ensure that engagement activities are implemented across the organisation. Insights gathered through surveys and dialogue processes are considered in workforce-related decision-making.

Engagement takes place through both direct communication with employees and, where applicable, through workers' representatives, supporting the safeguarding of employee rights and interests in line with legal requirements. Although ES, UK, and PL are not included in formal representative arrangements, these entities maintain direct engagement with employees and operate in compliance with applicable national and EU labour regulations.

The effectiveness of engagement processes is not currently monitored through defined indicators. In addition, no specific engagement processes targeting marginalised groups have been established, as no such groups have been identified as being disproportionately impacted by OP Group's business activities.

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

OP Group has established processes to enable employees and other relevant stakeholders to raise concerns confidentially and without fear of retaliation. These processes are designed to identify, investigate, and remediate actual or potential negative impacts related to the workforce.

Concerns can be reported through an anonymous online whistleblowing platform or directly to local compliance contacts. Upon receipt of a report, acknowledgement is provided within seven days, and feedback is given within three months following an internal review. Cases are assessed by local compliance contacts and, where relevant, by the Compliance Committee, which comprises group-wide and country-specific compliance representatives, management, and, where appropriate, external experts. The committee is authorised to initiate corrective, disciplinary, or legal actions depending on the nature and severity of the case.

OP Group is committed to promptly addressing complaints related to discrimination, harassment, or other misconduct. Follow-up procedures are applied to assess the effectiveness of corrective measures and to reduce the risk of recurrence.

The awareness of and trust in the reporting and remediation processes are assessed through engagement with employee representatives. In entities where workers' councils are established, these bodies support dialogue between employees and management and contribute to ensuring that workforce concerns are appropriately addressed.

3.1.6 Actions related to OP Group's own workforce (S1-4)

OP Group has implemented a set of actions to address material impacts and opportunities related to its own workforce. These actions focus on improving working conditions, strengthening employee engagement, supporting work-life balance, and promoting diversity and inclusion. All actions are integrated into OP Group's regular operations and form part of the Group's overall workforce management approach.

Standardized action plans

Standardised action plans serve as the central framework for OP Group's workforce strategy, ensuring consistency and alignment across initiatives and entities. The plans consolidate improvement actions identified through employee feedback, including results from employee satisfaction surveys and eNPS measurements, and translate them into targeted measures aimed at continuous improvement.

The action plans align workforce-related initiatives across the organisation and support tailored interventions, such as the implementation of a group-wide tool to standardise training efforts, planned for completion in 2027. These measures are designed to strengthen employee engagement, enhance working conditions, and support clear career pathways. As part of OP Group's first year of CSRD reporting, the monitoring of workforce initiatives is being further developed. Effectiveness is assessed through a combination of available quantitative and qualitative inputs, including annual employee surveys, cooperation with Human Resources, and internal ESG reporting processes. Additional feedback mechanisms include annual employee appraisals and regular manager meetings, which contribute to the ongoing refinement of workforce-related measures.

Within the standardised action plans, OP Group has implemented measures to prevent or mitigate potential negative impacts on the workforce, including diversity safeguards in recruitment processes and employee feedback mechanisms. The plans also support positive impacts related to working time arrangements through flexible working models and regulated overtime, which reduce the risk of excessive working hours and support work-life balance. Employee engagement and inclusivity are further strengthened through team events, joint activities, and after-work gatherings.

Employee feedback and eNPS

Employee Net Promoter Score (eNPS) surveys are a key element of OP Group's workforce strategy. The Group is developing a standardised set of eNPS questions, including differentiation by production and non-production roles and by entity, with rollout planned across all entities. eNPS surveys are conducted across OP Group's own operations and serve as a structured feedback mechanism that provides transparency on employee perceptions and supports the prioritisation of workforce initiatives.

Feedback from eNPS surveys has highlighted the importance of flexible working time models and regulated overtime, reinforcing measures aimed at reducing excessive working hours and promoting work-life balance. In addition, eNPS feedback enables employees to raise concerns related to diversity topics, such as gender representation in senior roles, and supports OP Group

in developing targeted measures to strengthen equal opportunities and internal career progression.

Training and employee development

Employee training and development are key components of OP Group's workforce strategy and support improved working conditions and sustainable working time arrangements. OP Group provides structured training programmes to foster internal talent, enhance skills, and ensure consistent learning standards across the organisation. By strengthening employee capabilities, these initiatives help improve operational efficiency, reduce inefficiencies, and limit reliance on overtime.

Training initiatives are implemented group-wide and are embedded in operational practice. In addition to role-specific training, OP Group offers programmes focused on leadership development, career progression, and skills enhancement, supporting equal opportunities for advancement and long-term employee retention

Flexible working time models

Flexible working time arrangements, including remote work options where applicable, support work-life balance and employee well-being across OP Group. These arrangements enable employees to manage their working schedules more effectively, reduce stress, and balance professional and personal responsibilities. As such, they help mitigate potential negative impacts related to excessive working hours and contribute to sustainable workforce participation.

Diversity and equal opportunities

OP Group applies transparent recruitment and selection processes across all positions to ensure equal opportunities for qualified candidates, regardless of gender or background. Diversity safeguards embedded in recruitment and employment practices, including transparent selection criteria, non-discrimination principles, and staff training, support fair treatment throughout the employee lifecycle.

Annual employee surveys and the collection of workforce diversity data provide insights to monitor inclusivity and strengthen employee retention. These actions support OP Group's objective of maintaining a diverse and engaged workforce, strengthening the pipeline of talent for future leadership roles, and retaining critical skills and knowledge across the organisation.

General information for all actions:

OP Group confirms that its workforce-related practices do not cause or contribute to material negative impacts on employees. Preventive measures and compliance safeguards are embedded in relevant business processes to support labour rights and ethical conduct. Where changes to business activities or business relationships may affect employees, OP Group seeks to identify potential impacts at an early stage and apply appropriate mitigation measures, such as timely communication, redeployment options, and employee support.

Dedicated Human Resources functions support the implementation and monitoring of workforce-related actions, including initiatives related to diversity, inclusion, and working time

arrangements. Regular reporting to senior management supports accountability and continuous improvement and ensures that workforce actions remain aligned with OP Group's standardised action plans.

3.1.7 Targets related to OP Group's own workforce (S1-5)

OP Group has established targets to manage material impacts, advance positive impacts, and address material risks and opportunities related to its own workforce. The targets focus on employee retention and occupational health and safety and reflect OP Group's commitment to improving working conditions, supporting employee well-being, and ensuring sustainable workforce participation.

The targets are designed to support long-term employee engagement, reduce turnover, and enhance productivity while contributing to fair and safe working conditions across the Group's operations.

Employee retention

OP Group aims to maintain high employee retention by providing an attractive and stable long-term working environment. In 2025, 10.47 % of OP Group's employees voluntarily left the Group. This figure reflects voluntary employee turnover only and excludes other forms of employee exits such as dismissals, retirements, or the expiry of fixed-term contracts. The voluntary turnover rate is compared against an industry benchmark of approximately 15 %. Based on this performance, OP Group has set a target to keep annual voluntary employee turnover below the industry average of 15 %.

The employee retention target is defined as a relative target and is measured as a percentage. Performance is monitored annually through workforce data and employee retention metrics. Retention trends are reviewed regularly to identify potential areas for improvement and to support targeted workforce initiatives

Lost Time Injury Frequency (LTIF)

OP Group monitors occupational health and safety performance using Lost Time Injury Frequency (LTIF) as a key performance indicator. LTIF is defined as the number of lost time injuries per one million hours worked and serves as a measurable, outcome-oriented, and time-bound indicator.

OP Group has set a target to maintain LTIF below the industry benchmark of 10. In 2025, the Group's LTIF stood at 9.86, compared to an industry average of 10 for the German printing sector, based on Eurostat 2022 data. This performance reflects OP Group's ongoing efforts to provide safe and healthy working conditions and to reduce work-related injuries and absenteeism.

For the purpose of calculating LTIF, total hours worked are determined based on full-time equivalents (FTE) multiplied by a standard number of annual working hours. This approach ensures consistent measurement and comparability across countries, despite differences in national working time arrangements.

The LTIF target is monitored through regular tracking and is reviewed alongside employee retention metrics. Together, these indicators provide insights into workforce stability, safety

performance, and overall working conditions. In the long term, OP Group aims to continuously reduce work-related accidents and support the objective of zero work-related incidents

General information for all targets:

The targets apply group-wide to OP Group's own employees. The targets are defined in relation to an external industry benchmark rather than an internal historical baseline.

The targets are informed by internal workforce data, external benchmarks, and relevant policy objectives. Stakeholders were involved in the target-setting process through engagement formats such as ESG Steering Committee discussions, town halls, and departmental exchanges. While the targets are aligned with recognised international standards and internal assessments, they are not based on conclusive scientific evidence.

Performance against workforce-related targets is reviewed on an annual basis, and adjustments may be made to reflect organisational developments, operational changes, or evolving workforce needs. No significant changes to social targets or metrics were made during the reporting period.

OP Group has not established quantitative outcome-oriented targets for diversity under the relevant ESRS topical standard. Instead, diversity is currently monitored through indicators and workforce data, including nationality and gender representation. The establishment of formal diversity targets may be considered once a sufficiently robust data foundation, and internal processes are in place. The establishment of quantitative targets for employee engagement (e.g. eNPS) and diversity may be considered once data consistency, comparability and internal governance processes are sufficiently mature.

The effectiveness of workforce-related targets and policies is further assessed through employee surveys, which provide qualitative and quantitative insights into employee perceptions, engagement, and material sustainability-related impacts.

3.1.8 Characteristics of OP Group's employees (S1-6)

This section provides contextual and quantitative information on the key characteristics of OP Group's employees, in line with the disclosure requirements set out in ESRS S1-6. The data describes the size, composition, and structure of the Group's workforce and supports an understanding of workforce-related impacts, risks, and opportunities.

Number of Employees	
Total number of employees by head count as of the end of the reporting period	1,672
Total number of employees who have left the undertaking during the reporting period	263
Rate of employee turnover in the reporting period	15.73%

The data is collected systematically, so assumptions do not apply. The measurement of the figures has not been validated by any external body.

The reported data regarding OP Group's workforce (including total number of employees, breakdowns by gender and country, categories and contract types, and employee turnover) is compiled as follows:

- The figures are presented as headcount
- Numbers are reported at the end of the reporting period
- Calculation methodology aligns with those outlined in the ESRS, unless otherwise disclosed
- If local jurisdiction requirements or industry-specific definitions differ and have been applied, these are also clearly stated.

This approach ensures clarity, comparability, and transparency for users regarding the reported workforce data.

Employee numbers in this report are presented as headcount at the end of the reporting period and therefore differ from the average number of employees disclosed under §50(a) in the consolidated financial statements (Annual Report, Section 4.5 “Personnel/employees”)

Employee turnover is calculated as the proportion of employees who have left OP Group during the reporting period. The numerator includes all employees who left voluntarily, due to dismissal, retirement, or death in service. The denominator is based on the total number of employees by headcount at the end of the reporting period. The methodology is applied consistently over time to ensure transparency and comparability.

Employee headcount by gender

Gender	Number of employees (head count)
Male	1,120
Female	552
Total Employees	1,672

Number of employees by country

Country	Number of employees (head count)
Germany	546
Spain	39
Denmark	412
Poland	373
United Kingdom	251
Sweden	51

Employees by contract type, broken down by gender

FEMALE	MALE	TOTAL
Number of employees (head count)		
552	1,120	1,672
Number of permanent employees (head count)		
504	1,050	1,554
Number of temporary employees (head count)		
7	21	28
Number of non-guaranteed hours employees (head count)		
40	50	90

3.1.9 Diversity metrics (S1-9)

Gender distribution at top level management

As of the end of the reporting period, OP Group's top management comprised the Chief Executive Officer (CEO) and the Chief Financial Officer (CFO). The gender distribution at top management level was as follows:

- **Male:** 2 (100 %)
- **Female:** 0
- **Diverse:** 0

OP Group defines top management as the CEO and CFO of the Group.

Age distribution of employees

Age distribution of employees		
	Numerical value	% value
<30	327	19.56%
30-50	841	50.30%
>50	504	30.14%
Total	1,672	

Methodologies used to calculate age distribution align with those prescribed in the ESRS. The calculation of the figures has not been validated by any external body.

3.1.10 Remuneration metrics (S1-16)

This section presents remuneration-related metrics for OP Group's own workforce in accordance with ESRS S1-16. The disclosed metrics provide transparency on pay structures and support the assessment of remuneration-related impacts and risks

Gender pay gap

In 2025, OP Group's unadjusted gender pay gap amounted to 11.77 %.

The unadjusted gender pay gap is calculated as the difference between the average gross hourly earnings of male paid employees and those of female paid employees, expressed as a percentage of the average gross hourly earnings of male paid employees.

Ratio of highest-paid individual to median remuneration

Annual total remuneration ratio of the highest-paid individual to the median annual total remuneration: 16.15

Annual total remuneration ratio of the highest-paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual).

Methodologies used to calculate the gender pay gap and the ratio of highest-paid individual to median remuneration align with those prescribed in the ESRS. The measurement of the figures has not been validated by any external body.

3.1.11 Incidents and complaints and severe human rights impacts (S1-17)

Incidents of discrimination incl. harassment	
Total number of incidents of discrimination, including harassment, reported in the reporting period	0
Number of complaints filed through channels for own people in the undertaking's own workforce to raise concerns (including grievance mechanisms)	2
Total amount of fines, penalties, and compensation for damages as result of incidents of discrimination, including harassment and complaints filed	0
Total amount of fines, penalties and compensation for damages for the incidents disclosed under §104 (a)	0

No severe human rights incidents connected to the undertaking's workforce occurred during the reporting period.

No fines, penalties or compensation for damages were recognised during the reporting period in relation to incidents or complaints of discrimination disclosed under ESRS S1-17 §103 (a) and (b). Accordingly, there is no reconciliation required with the amounts presented in the financial statements.

No fines, penalties or compensation for damages were recognised during the reporting period in relation to confirmed incidents of discrimination disclosed under ESRS S1-17 §104 (a).

Accordingly, there is no reconciliation required with the amounts presented in the financial statements.

Methodologies used to calculate metrics on incidents of discrimination align with those prescribed in the ESRS. The measurement of the figures has not been validated by any external body.

3.2 Workers in the Value Chain (ESRS S2)

3.2.1 Interests and views of stakeholders: Workers in the value chain (SBM-2)

OP Group considers workers in its value chain as important stakeholders and seeks to take their perspectives into account when managing sustainability-related risks and impacts. As engagement with value chain workers is primarily indirect, OP Group relies on supplier-led communication, audits, grievance mechanisms, and feedback channels to identify relevant concerns and inform decision-making.

Through these processes, OP Group aims to promote responsible practices, reduce potential negative impacts in the supply chain, and support transparency and collaboration across the value chain.

3.2.2 Material impacts, risks and opportunities related to workers in OP Group's value chain (SBM-3)

Defining workers in the value chain

OP Group defines workers in the value chain as individuals contributing to its activities but not directly employed by the Group. This includes employees of suppliers and contractors working on OP Group sites, workers in upstream supply chains involved in manufacturing products or providing services, and workers in downstream activities performed on behalf of OP Group.

All identified groups of value chain workers are considered in the assessment of material impacts, risks, and opportunities. OP Group has not identified widespread or systemic negative impacts beyond the potential risks described below, nor specific vulnerable groups requiring differentiated measures at this stage.

Material impacts and their interaction with OP Group's strategy and business model

OP Group has identified potential negative impacts on the health, safety, and human rights of value chain workers related to sourcing from suppliers in countries with weaker labour protections and to limitations in current supply chain monitoring practices. These potential impacts are primarily associated with upstream activities.

These findings inform the ongoing development of OP Group's sourcing strategy and business model. In response, OP Group aims to strengthen supplier selection, oversight, and monitoring practices, including enhancements to its Supplier Code of Conduct and the gradual development of more structured supplier due diligence processes.

Material IRO's for workers in the value chain

Sub-Topic	IRO-Category		Scenario	Time Horizon	Position in the value chain	Description
Working Conditions	Impact	(-)	Potential	Short term	Upstream	OP Group has a potential negative impact on employee health and well-being due to sourcing from suppliers in countries with weak labor protections in its value chain, which may lead to risks of poor working conditions.
Other work-related rights	Impact	(-)	Potential	Short term	Upstream	OP Group has a potential negative impact on human rights due to lacking monitoring procedures for supply chain practices in its value chain, which may lead to an increased risk of violations.

3.2.3 Policies related to value chain workers (S2-1)

OP Group addresses potential negative impacts on workers in the value chain primarily through its Supplier Code of Conduct, which applies to all suppliers throughout the duration of the business relationship. The policy sets minimum standards for responsible business conduct in the value chain and serves as the primary framework for managing labour and human rights-related risks.

The Supplier Code of Conduct outlines requirements related to human rights, labour standards, health and safety, environmental protection, ethical conduct, and legal compliance. It explicitly prohibits child and forced labour, requires non-discrimination and respect for freedom of association and collective bargaining, and establishes expectations for safe and healthy working conditions. These requirements apply to suppliers and are expected to be extended to subcontractors and upstream partners.

Health and safety expectations include the provision of safe work environments, hazard identification, accident prevention, emergency preparedness, appropriate use of personal protective equipment, incident reporting, and corrective actions. Suppliers are required to comply with applicable laws and regulations and to implement preventive measures to reduce risks to workers' health and well-being.

The Supplier Code of Conduct also establishes grievance mechanisms, including access to a multilingual whistleblowing portal and supplier-run reporting systems. It includes commitments to confidentiality and non-retaliation, ensuring that concerns can be raised without fear of reprisals. These mechanisms are intended to enable early identification of potential issues and support remediation where necessary.

Implementation of the Supplier Code of Conduct is the responsibility of Executive Management, with oversight from the ESG Steering Committee, which is the most senior body accountable for managing material sustainability matters related to the value chain. Compliance with the policy is monitored through communication to suppliers, risk assessments, audits, performance reviews, and reporting channels. Non-compliance may result in corrective actions, and in cases of serious or repeated violations, termination of the business relationship.

The Supplier Code of Conduct is aligned with internationally recognised frameworks, including the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the ILO core labour standards. These frameworks are translated into concrete requirements for suppliers, covering working conditions, non-discrimination, freedom of association, and the prohibition of forced and child labour. Where national laws and international human rights standards differ, suppliers are required to meet national laws as a minimum standard.

The policy is communicated to suppliers through onboarding processes and contractual documentation and is made accessible to relevant stakeholders. The policy is publicly available as part of OP Group's ESG Report, which is published on the Group's websites. Suppliers are required to communicate the requirements to their employees and subcontractors and to provide training as appropriate. No cases of non-respect of the referenced international human rights frameworks were reported in OP Group's upstream or downstream value chain during the reporting period.

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

OP Group engages with value chain workers primarily through indirect engagement mechanisms embedded in its supplier relationships. As workers in the value chain are not directly employed by OP Group, engagement is facilitated through supplier-led communication, training initiatives, audits, and grievance mechanisms designed to capture relevant feedback on working conditions, health and safety, and human rights-related matters.

Suppliers are required to communicate the Supplier Code of Conduct to their employees, provide initial and ongoing training, respect freedom of association and collective bargaining, and promptly report workplace incidents or concerns. These requirements are intended to ensure that value chain workers are informed of their rights and available reporting channels throughout the supplier relationship.

Where direct engagement with workers is not feasible, OP Group relies on credible proxies such as supplier representatives, audit findings, and reported cases to gain insight into working conditions and labour practices. Feedback gathered through these channels, together with audit results, is used to identify potential negative impacts and inform corrective actions, enhanced supplier training, and adjustments to contractual requirements.

Engagement takes place at multiple stages of the supplier relationship. During onboarding, suppliers confirm their acceptance and communication of the Supplier Code of Conduct. Throughout the contractual period, engagement continues through audits, performance reviews, and ongoing dialogue with suppliers. Value chain workers may raise concerns at any time through the multilingual whistleblowing portal, the compliance email, or supplier-established reporting systems.

Operational responsibility for engagement with value chain workers lies with Procurement and Production management, supported by the ESG function, with reporting to Executive Management. At present, the effectiveness of engagement is assessed primarily through qualitative inputs, including audit findings, follow-up on reported concerns, and supplier communication. While direct involvement of workers in evaluating the effectiveness of engagement is limited, OP Group uses available feedback to identify areas for improvement.

OP Group plans to further strengthen its engagement processes by assessing awareness, accessibility, and trust in grievance and reporting mechanisms. This assessment is planned to be

conducted through supplier surveys and analysis of reported cases and resolution outcomes, with the objective of continuously improving engagement and responsiveness over time.

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

OP Group enables remediation of potential negative impacts on value chain workers primarily through grievance and corrective-action mechanisms defined in the Supplier Code of Conduct. These mechanisms include a designated OP Group contact person, a multilingual internet-based whistleblowing portal that allows confidential and anonymous reporting, and supplier-run grievance systems. Suppliers are encouraged to establish and maintain their own grievance mechanisms for workers in the value chain.

Reported concerns, including workplace incidents, health and safety issues, human rights-related risks, and data protection breaches, must be reported promptly and are logged and reviewed internally. Issues are addressed through corrective actions, supported by audits, inspections, risk management processes, emergency plans, training, and contractual enforcement where necessary. Serious or repeated non-compliance may result in termination of the business relationship.

While OP Group does not yet operate a fully formalised remediation framework with predefined remediation outcomes or systematic effectiveness assessments, existing grievance and corrective-action processes are used to identify weaknesses and prevent recurrence. Oversight is ensured through audits, software-based monitoring tools, and follow-up on corrective actions.

To strengthen transparency and due diligence, OP Group uses the Prewave tool for supplier monitoring within DE. For DK, SE, PL and UK, supplier due diligence is currently ensured through the collection of signed Supplier Codes of Conduct from vendors. These approaches support the identification of potential risks and contribute to ongoing improvements in supplier compliance.

Value chain workers can raise concerns directly through the whistleblowing portal, compliance email, or supplier-established reporting systems. OP Group monitors reported issues by logging and reviewing each case and ensures that suppliers communicate available grievance channels to workers. Awareness of these channels is reinforced through supplier-led training and communication.

OP Group is preparing to further evaluate awareness, accessibility, and trust in grievance mechanisms in the coming year. This will include supplier surveys, review of reported cases, and monitoring of resolution outcomes across whistleblowing and reporting channels. The results of this evaluation will inform improvements to grievance processes, training initiatives, and supplier requirements, with the objective of strengthening remedy and trust over time.

3.2.6 Actions related to value chain workers (S2-4)

OP Group has implemented a set of actions aimed at preventing and mitigating potential negative impacts on workers in the value chain, primarily through requirements placed on suppliers and ongoing improvements to supplier management practices.

Under the Supplier Code of Conduct, suppliers are required to ensure working conditions that respect employees' needs, including safe and healthy workplaces, non-discrimination, respect for human rights, and transparent remuneration practices. These requirements apply throughout the duration of the business relationship and extend to subcontractors. ESG-related criteria have

been integrated into supplier agreements since 2023, and the Supplier Code of Conduct was updated in 2025 to strengthen expectations related to labour and human rights standards.

Supplier compliance with these requirements is supported through audits, inspections, and continuous communication. For suppliers that become strategically or operationally significant, OP Group may conduct on-site visits, including reviews of production facilities, machinery, and operational processes. These actions support early identification of potential risks related to working conditions and enable corrective measures where needed.

At present, OP Group does not have a fully formalised, group-wide supplier onboarding procedure. However, the development and implementation of such a procedure is planned within the next year. This will further operationalise the principles of the Supplier Code of Conduct and strengthen supplier due diligence, including clearer requirements, documentation, and follow-up processes. A more structured supplier due diligence framework is planned for implementation from 2026.

Beyond compliance-driven actions, OP Group does not currently implement additional initiatives with the primary purpose of delivering positive impacts for value chain workers. Instead, the Group focuses on identifying and mitigating potential adverse impacts through audits, inspections, and ongoing dialogue with suppliers. Potential risks related to sourcing from countries with weaker labour protections are addressed through these measures and through the gradual strengthening of supplier requirements and monitoring practices.

OP Group has not yet established formal processes to assess or address impacts on value chain workers when terminating business relationships, nor processes to provide remedy in such cases. While no actual severe incidents have been reported, OP Group acknowledges that potential risks may exist and is taking steps to strengthen resilience in its value chain. The majority of OP Group's value chain is located in Europe, where robust labour protections and supply chain regulations reduce overall risk exposure.

No severe human rights incidents connected to OP Group's upstream or downstream value chain were reported during the reporting period. While no dedicated resources are allocated specifically to the management of severe human rights impacts, these topics are addressed within existing responsibilities and processes of the relevant departments, ensuring that potential risks are monitored and addressed as part of standard operations.

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

OP Group has set a qualitative target to strengthen the management of material impacts, risks, and opportunities related to workers in the value chain by implementing a supplier compliance and monitoring tool across all Group entities in 2027. The objective of this target is to enhance transparency, oversight, and risk identification in the supply chain, in line with the requirements of the Supplier Code of Conduct.

At present, the Prewave tool is used to support supplier monitoring and due diligence within DE. OP Group is currently evaluating whether to continue with Prewave or implement an alternative solution that can be applied consistently across all entities. The selected solution is expected to support supplier mapping, risk screening, and monitoring of compliance with labour and human rights standards.

The baseline year for measuring progress against the target is 2025. Progress is assessed based on the gradual rollout of the compliance tool across entities, with each entity covered by the tool considered a milestone toward achieving group-wide implementation. The scope of the target covers all suppliers under contract with OP Group.

The target is qualitative in nature and is not expressed as an absolute or relative quantitative metric. Performance against the target is monitored internally through reviews of implementation status, supplier coverage, and alignment with planned actions. No specific quantitative performance indicators have been defined at this stage.

The target was defined in consideration of OP Group’s operational context, maturity level, and sustainability priorities and is aligned with the objectives of the Supplier Code of Conduct. It is informed by ongoing dialogue with suppliers and internal experience with supplier engagement and monitoring. The target is not based on conclusive scientific evidence but represents a practical step toward strengthening supply chain due diligence.

No changes to the target, scope, or methodology were made during the reporting period

4. Governance Information

4.1 Business Conduct (ESRS G1)

Corporate Governance (G1)

OP Group identifies impacts, risks and opportunities related to business conduct through continuous analysis of business relationships and transactions as part of its risk management and compliance approach. This includes assessing contextual conditions at each location and reviewing relationships with partners, customers and suppliers, including contract characteristics and corruption risks, particularly in sales, marketing and procurement activities

Material IROs for business conduct

Sub-topic	IRO-Category	Scenario	Time Horizon	Position in the value chain	Description
Corporate Culture	Opportunity	Potential	Medium- and long-term	Own business activities	OP Group has an opportunity to strengthen its corporate culture, which could lead to improved employee satisfaction and retention, resulting in lower operating and recruitment costs.
Management of relationships with suppliers including payment practices	Opportunity	Potential	Short-, medium-, and long-term	Upstream and own business activities	OP Group has an opportunity to enforce the management of relationships with suppliers in its supply chain, which could lead to improved transparency, stronger supplier relationships, stable business

					partnerships, and lower adjustment costs.
Corruption and bribery	Risk	Potential	Medium- and long-term	Own business activities	OP Group faces a risk of potential offences related to corruption or bribery in its operations, which could lead to severe financial impacts such as legal costs and possible fines.

4.1.1 Business conduct policies and corporate culture (G1-1)

Overview of Policies

The following overview illustrates the implementation of key business conduct-related policies across OP Group. While several policies are applied group-wide, some are currently implemented at entity level, reflecting OP Group’s current stage of governance harmonization.

This chapter outlines OP Group’s approach to responsible business conduct, including the principles and practices embedded in its Code of Conduct, Supplier Code of Conduct, entity-level anti-corruption and bribery policies, and related initiatives that shape and support corporate culture.

Code of Conduct

OP Group has established a group-wide Code of Conduct as the primary framework for managing material impacts, risks, and opportunities related to business conduct. The Code promotes ethical behaviour, integrity, compliance with laws and regulations, and the prevention of conflicts of interest across all business activities.

The Code of Conduct defines clear expectations for employees and management and addresses topics such as equal treatment, professional relationships, customer and supplier interactions, data protection, health and safety, environmental responsibility, and lawful conduct. Corporate culture is supported through principles of respect, accountability, and customer focus and is monitored through employee surveys and selected workforce metrics, with oversight from the ESG Steering Committee.

OP Group applies a zero-tolerance approach to corruption and bribery. All forms of bribery and corruption are prohibited, gifts and hospitality must be declared and approved according to defined rules, and any suspected violations must be reported immediately.

OP Group has established mechanisms to identify, report, and investigate concerns related to unlawful behaviour or breaches of the Code of Conduct. These include confidential and anonymous reporting channels, reporting via supervisors or designated compliance contacts, and defined investigation and corrective-action procedures. During the reporting period, **two whistleblower reports** were received. Acknowledgement is issued within seven days, and feedback is provided within three months following assessment by the Compliance Committee.

Supplier Code of Conduct

OP Group manages its supplier relationships through a Supplier Code of Conduct, which sets binding minimum requirements for suppliers across the value chain. The policy aims to ensure responsible business practices, alignment with international standards, and mitigation of risks such as non-compliance and supply chain disruptions.

The Supplier Code of Conduct covers ethical behaviour, integrity, human rights and labour standards, health and safety, environmental protection, monitoring and auditing, reporting and whistleblowing, and alignment with international frameworks. Payment practices are currently not explicitly included in the Supplier Code of Conduct and are addressed separately under G1-6.

Compliance with the Supplier Code of Conduct is monitored through communication, audits, reviews, reporting channels, and corrective-action processes, including the use of digital monitoring tools. For further details on grievance and remediation mechanisms related to suppliers, reference is made to ESRS S2-3.

Policies to manage Corruption and Bribery

OP Group currently does not have a fully harmonised group-wide Anti-Bribery and Corruption policy, including a group-wide training programme. A group-level policy is under development, with rollout planned from 2026. In the interim, entity-level anti-corruption and bribery policies are in place at DK, SE, PL and UK, aligned with national legislation and relevant international standards.

These policies address the material risk of corruption and bribery offences, which could lead to significant financial and reputational impacts. They prohibit offering, soliciting, or accepting bribes or facilitation payments, require declaration of gifts and hospitality, and mandate immediate reporting of suspected breaches. Allegations are investigated, and violations may result in disciplinary action or termination of contracts.

The most senior level accountable for implementing these policies is local management, supported by compliance and governance functions.

Reference to Third-party standards or initiatives

- **DK, SE & PL:** DK, SE & PL's Anti-Corruption and Bribery Policy aligns with Danish statutory requirements and is supported by the Graphic CSR Code and Graphic ESG Code, developed by GRAKOM and HK/Privat and based on the UN Global Compact, including Principle 10 on anti-corruption.
- **UK:** UK maintains an Anti-Bribery and Corruption Policy aligned with the UK Bribery Act and referencing the UN Global Compact Principle 10

Consideration of Key Stakeholders' Interests in Policy Setting

At entity level, DK, SE, PL and UK incorporate stakeholder perspectives, including employees, suppliers, customers, and local communities, through dialogue with employee representatives, trade unions, industry associations, policy reviews, workplace assessments, and reporting

channels. These inputs inform policy development and updates and support a culture of integrity and accountability.

Availability of the Policy to Stakeholders

Relevant business conduct policies are made available to employees through onboarding, handbooks, and internal platforms. Suppliers and business partners are informed through contractual documentation and are required to acknowledge applicable policies prior to cooperation. Policies are accessible to external stakeholders upon request, and material updates are communicated accordingly.

Functions most at risk of corruption and bribery

Functions identified as having higher exposure to corruption and bribery risks include Procurement (notably paper procurement due to high transaction volumes), Sales & Business Development, and Finance & Accounting. These areas are subject to approval processes and internal controls designed to mitigate risk.

Targets related to business conduct (G1-4)

OP Group has not yet set measurable outcome-oriented targets related to corporate culture, supplier relationship management (including payment practices), or corruption and bribery. Target-setting is currently under development, as governance structures, data availability, and performance management processes are being strengthened. Formal adoption of targets is expected following completion of these preparatory steps.

In the interim, effectiveness is monitored through internal audits, compliance reviews, supplier assessments, whistleblowing mechanisms, and selected workforce and payment practice indicators.

4.1.2 Management of relationships with suppliers (G1-2)

OP Group manages its relationships with suppliers through a combination of contractual requirements, operational controls, and ongoing monitoring processes. The Supplier Code of Conduct establishes minimum expectations related to ethical behaviour, human rights, labour standards, environmental protection, and compliance with applicable laws and international standards. These requirements apply throughout the supplier relationship and are expected to be upheld across suppliers' own supply chains.

Payment practices are managed through defined operational processes and are disclosed separately under G1-6. While OP Group does not apply fully standardised payment terms across all suppliers, a minimum payment term of 14 days from the invoice date is applied to allow sufficient time for internal processing and approval. Payments are executed on a weekly basis. To reduce the risk of late payments, all invoices must be submitted through a designated approval system, which automatically notifies responsible approvers and issues reminders at regular intervals until approval is completed. These controls are complemented by manual follow-up from the finance function.

OP Group does not differentiate between suppliers when applying payment practices. The approach is designed to support timely payments, reduce administrative delays, and foster fair and transparent relationships with suppliers.

In addition to payment-related controls, OP Group requires suppliers to comply with relevant laws and international standards on human rights, labour, and environmental protection. This includes prohibitions on discrimination, forced and child labour, requirements for safe working conditions, and expectations related to environmental management. Suppliers are expected to identify, assess, and manage risks related to quality, compliance, environmental, and social matters and to ensure that these standards are upheld throughout their own value chains.

Compliance with supplier requirements is monitored through audits, inspections, and reviews. Where violations are identified, corrective actions are required, and in cases of serious or repeated non-compliance, OP Group may terminate the business relationship. Social and environmental criteria are integrated into the selection and evaluation of suppliers, supporting responsible sourcing and long-term partnerships.

4.1.3 Prevention and detection of corruption and bribery (G1-3)

OP Group addresses the prevention and detection of corruption and bribery through a combination of group-wide principles, entity-level policies, internal controls, and reporting mechanisms.

All new employees are required to review and formally acknowledge the Code of Conduct as part of the onboarding process. The Code of Conduct provides guidance on ethical behaviour, conflicts of interest, and zero tolerance for bribery and corruption and applies across all Group entities. Additional training and awareness activities related to anti-corruption and bribery are currently managed at entity level and vary by function and location.

During the reporting period, OP Group initiated a comprehensive revision of its group-wide Risk Management System (RMS) and Internal Control System (ICS). This initiative aims to strengthen the systematic identification, assessment, and mitigation of risks, including risks related to corruption and bribery. Key elements of the revision include clearer assignment of risk ownership, refinement of risk descriptions, and documentation of mitigation measures to improve transparency and traceability. Completion of key milestones is planned by Q2 2026.

Reporting and Investigation procedures

OP Group has established reporting channels to enable employees and other stakeholders to raise concerns related to corruption and bribery. These include confidential and anonymous whistleblowing mechanisms and reporting via supervisors or designated compliance contacts.

At present, investigations are managed internally within the relevant business functions. OP Group does not yet operate a formal process to ensure that investigations are conducted by bodies fully independent from the management chain involved, nor a structured process for reporting investigation outcomes to administrative, management, or supervisory bodies. Outcomes are handled within the relevant operational functions.

Communication and Accessibility

The Code of Conduct and related guidance on anti-corruption and bribery are made accessible through multiple channels, including the company website, internal platforms, QR codes, and physical copies at company facilities. Entity-level policies are communicated through additional

local channels, such as intranet pages, internal screens, and email communication, to ensure accessibility and awareness.

Training and awareness

New employees are required to review and acknowledge the Code of Conduct during onboarding. OP Group does not currently provide group-wide training programmes on anti-corruption and bribery for administrative, management, and supervisory bodies or for functions identified as higher risk. The development of a group-wide Anti-Bribery & Corruption policy is expected to be accompanied by a more structured training framework for at-risk functions following implementation.

Anti-corruption KPIs (2025)

OP Group reports the following indicators related to prevention and detection of corruption and bribery:

- **Functions-at-risk covered by anti-corruption training: 0 %**
- **Number of convictions for violation of anti-corruption and anti-bribery laws: 0**
- **Amount of fines for violation of anti-corruption and anti-bribery laws: €0**

Methodologies used to calculate these metrics align with ESRS requirements. The reported figures have not been validated by an external body. During the reporting period, no confirmed breaches of OP Group's procedures or standards related to corruption and bribery were identified, and no remediation actions were required.

4.1.4 Payment practices (G1-6)

Payment practices	
Disclose the average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment starts to be calculated, in number of days	28,5
Disclose the undertaking's standard payment terms in number of days by main category of suppliers	Supplier (Material): 35,26 Supplier (Shipping): 26,13 Supplier (Rep&Main): 29,88 Supplier (Marketing): 27,83 Supplier (Other): 28,43
Disclose the number of legal proceedings currently outstanding for late payments	0
Disclose complementary information necessary to provide sufficient context over disclosure on payment practices	n/a
If the undertaking has used representative sampling to calculate the information required under point 33 (a), then it shall state that fact and briefly describe the methodology used	We calculate the average payment period by dividing the average balance of accounts payable (creditors + suppliers) by total purchases and multiplying by 365.

4.2 Entity specific: Cybersecurity

Material Impacts, Risks and Opportunities for Cybersecurity

Sub-Topic	IRO-Category		Scenario	Time Horizon	Position in the value chain	Description
Cybersecurity	Impact	(-)	Potential	Short-, medium-, and long-term	Own business activities	OP Group has a potential negative impact on digital security due to faulty data encryption practices, which could lead to vulnerabilities and unauthorized access to customer and business data.
Cybersecurity	Risk		Actual	Short-/ and medium-term	Own business activities and downstream	OP Group faces a risk related to cybersecurity due to inadequate encryption standards and flawed data protection protocols in its IT systems, which could lead to unauthorized data access, regulatory non-compliance, financial losses, reputational damage, and extensive corrective actions.

Cybersecurity

Cybersecurity is critical for OP Group to protect sensitive customer and business data, secure payment information in online transactions, and ensure uninterrupted access to its printing services. A robust cybersecurity framework supports trust in OP Group's e-commerce operations and reduces exposure to financial and operational risks.

In 2024, OP Group partnered with intcube, a cybersecurity consultancy, to conduct a comprehensive cybersecurity assessment using the 18 CIS Controls (v8.1). The assessment evaluated digital resilience and risk exposure across areas such as security awareness, incident management, asset inventory, and software asset control.

In 2025, the assessment results showed a maturity level between 53 % and 69 % for entities, compared to a portfolio average of 52 % in 2024. The maturity levels reflect the degree of implemented cybersecurity practices across the CIS Controls and are based on a standardised internal self-assessment, enabling comparison across entities and over time rather than against external industry benchmarks. These results indicate a solid baseline with particular strengths in asset inventory management and employee awareness. Based on the assessment, OP Group developed a structured and prioritised cybersecurity roadmap to address identified gaps and strengthen governance and risk management. Progress against this roadmap is monitored on an ongoing basis.

4.2.1 Policies related to cybersecurity

OP Group is in the process of implementing a group-wide Data Security and Privacy Policy, planned for rollout in 2026. Until then, each entity maintains its own data protection and

cybersecurity policies, supplemented by group-wide cybersecurity insurance (with UK covered via a FINC clause).

The policies aim to protect the confidentiality, integrity, and availability of customer and business data, ensure compliance with applicable data protection regulations (including GDPR), and reduce the likelihood and impact of cybersecurity incidents. They address key risks such as unauthorised access, regulatory non-compliance, financial losses, and reputational damage.

Policy implementation and compliance are monitored through recurring penetration testing required by insurance arrangements, internal audits under applicable quality management systems, and tracking of progress against the cybersecurity roadmap. Accountability for implementation lies with Executive Management in cooperation with the IT departments of each entity. The policies apply group-wide and cover all relevant IT systems and internal activities. Affected stakeholders include customers, business partners, and employees.

4.2.2 Actions and resources related to cybersecurity

Following the cybersecurity assessment, OP Group established a roadmap that is reviewed annually and updated as needed. Actions derived from the roadmap are embedded in daily operations and supported by ongoing penetration testing.

Key focus areas of the roadmap include:

- **Vulnerability management**, including implementation of a structured vulnerability management process and expansion of automated patching for operating systems and critical applications
- **Malware defences**, including deployment of behaviour-based anti-malware solutions
- **Audit log management**, including enabling logging across enterprise assets, documenting log management processes, and ensuring regular review and retention of logs

These actions are expected to improve resilience against cyber threats, enhance detection and response capabilities, and increase transparency and accountability through strengthened monitoring and review processes. All actions apply group-wide and are ongoing.

4.2.3 Targets related to cybersecurity

OP Group monitors the effectiveness of its cybersecurity policies and actions through an absolute target of maintaining zero data breaches or security incidents across all operations.

In 2025, OP Group recorded zero data breaches, and the Group aims to maintain this standard in 2026. The target is measured by counting incidents and applies group-wide. The baseline year is 2024, with no interim milestones defined.

The target is not based on specific scientific methodologies but reflects OP Group's risk management objectives and regulatory requirements. No changes to the target, methodologies, or underlying assumptions were made during the reporting period. Progress is monitored through internal audits and incident reporting, with no significant deviations identified.

4.2.4 Metrics related to cybersecurity

OP Group does have plans to measure progress against its cybersecurity targets. The company monitors the effectiveness of its cybersecurity policies and actions primarily through the target of maintaining zero data breaches or security incidents across all operations. This is tracked by counting incidents and is reported as a group-wide metric.

Additionally, OP Group is developing internal processes and governance structures to further integrate target-setting and performance measurement into its broader management framework. There are ongoing efforts to align the measurement of cybersecurity metrics with established frameworks such as CIS Controls and ISO 27001. Metrics being tracked or planned include the number of security incidents, the closure rate of critical vulnerabilities, participation in security awareness training, and the number of penetration tests conducted.

Progress is reviewed annually, and results are reported to management to align actions with the company's cybersecurity objectives.

5. Annex

5.1 List of Material Topics (ESRS 1 AR16 List)

This list presents the sustainability topics identified as material for OP Group based on the double materiality assessment and fulfils the requirements of ESRS.

ESRS	Topic	Disclosure Requirement	Reference Sustainability Report
ESRS 2	General Disclosures	BP-1 General basis for preparation of sustainability statements	General basis for preparation of the sustainability statements (BP-1) (Section 1.1.1)
		BP-2 Disclosures in relation to specific circumstances	Disclosures in relation to specific circumstances (BP-2) (Section 1.1.2)
		Time horizons	
		Value chain estimation	
		Sources of estimation and outcome uncertainty	
		Incorporation by reference	
		GOV-1 The role of the administrative, management and supervisory bodies	The role of the administrative, management and supervisory bodies (GOV-1) (Section 1.2.1)
		GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies (GOV-2) (Section 1.2.2)
		GOV-3 Integration of sustainability-related performance in incentive schemes	Integration of sustainability-related performance in incentive schemes (GOV-3) (Section 1.2.3)
		GOV-4 Statement on due diligence	Statement on sustainability due diligence (GOV-4) (Section 1.2.4)
		GOV-5 Risk management and internal controls over sustainability reporting	Risk management and internal controls over sustainability reporting (GOV-5) (Section 1.2.5)
		SBM-1 Strategy, business model and value chain	Strategy, business model and value chain (SBM-1) (Section 1.3.1)
		SBM-2 Interests and views of stakeholders	Interests and views of stakeholders (SBM-2) (Section 1.3.2)
		SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3) (Section 1.3.3)
IRO-1 Description of the process to identify and assess material impacts, risks and opportunities	Description of the process to identify and assess material impacts, risks and opportunities (IRO-1) (Section 1.4.1)		

		IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statements	Disclosure Requirements in ESRS covered by the undertaking's sustainability statements (IRO-2) (Section 1.4.3)
ESRS E1	Climate change	E1-1 Transition plan for climate change mitigation	Transition plan for climate change mitigation (E1-1) (Section 2.1.2)
		E1-SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3) (Section 1.3.3) Description of the processes to identify and assess material climate-related impacts, risks and opportunities (IRO-1) (Section 2.1.1)
		E1-IRO-1 Description of the process to identify and assess material climate-related impacts, risks and opportunities	Description of the processes to identify and assess material climate-related impacts, risks and opportunities (IRO-1) (Section 2.1.1)
		E1-2 Policies related to climate change mitigation and adaptation	Policies related to climate change mitigation and adaptation (E1-2) (Section 2.1.3)
		E1-3 Actions and resources in relation to climate change policies	Actions and resources in relation to climate change policies (E1-3) (Section 2.1.4)
		E1-4 Targets related to climate change mitigation and adaptation	Targets related to climate change mitigation and adaptation (E1-4) (Section 2.1.5)
		E1-5 Energy consumption and mix	Energy consumption and mix (E1-5) (Section 2.1.6)
		E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6) (Section 2.1.7)
		E1-7 GHG removals and GHG mitigation projects financed through carbon credits	GHG removals and GHG mitigation projects financed through carbon credits (E1-7) (Section 2.1.8)
		E1-8 Internal carbon pricing	Internal carbon pricing (E1-8) (Section 2.1.9)
ESRS E3	Water and marine Resources	Disclosure requirements considering the delegated act "Quick Fix" (extension of the phased-in disclosure requirements according to ESRS 1 Annex C)	Introduction and application of Quick-Fix Delegated Act (Section 2.2)
ESRS E5	Resource use and circular economy	E5-IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	Description of processes (IRO-1) (Section 2.3.1)
		E5-1 Policies related to resource use and circular economy	Policies related to resource use and circular economy (E5-1) (Section 2.3.2)

		E5-2 Actions and resources related to resource use and circular economy	Actions and resources (E5-2) (Section 2.3.3)
		E5-3 Targets related to resource use and circular economy	Targets related to resource use and circular economy (E5-3) (Section 2.3.4)
		E5-4 Resource inflows	Resource inflows (E5-4) (Section 2.3.5)
		E5-5 Resource outflows	Resource outflows (E5-5) (Section 2.3.6)
ESRS S1	Own workforce	S1 SBM-2 Interests and views of stakeholders	Interests and views of stakeholders (SBM-2) (Section 3.1.1)
		S1-SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities (SBM-3) (Section 3.1.2)
		S1-1 Policies related to own workforce	Policies related to OP Group's own workforce (S1-1) (Section 3.1.3)
		S1-2 Processes for engaging with own workforce and workers' representatives about impacts	Processes for engaging with own workforce and workers' representatives (S1-2) (Section 3.1.4)
		S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns	Processes to remediate negative impacts and channels to raise concerns (S1-3) (Section 3.1.5)
		S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Actions related to OP Group's own workforce (S1-4) (Section 3.1.6)
		S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to OP Group's own workforce (S1-5) (Section 3.1.7)
		S1-6 Characteristics of the undertaking's employees	Characteristics of OP Group's employees (S1-6) (Section 3.1.8)
		S1-9 Diversity metrics	Diversity metrics (S1-9) (Section 3.1.9)
		S1-16 Remuneration metrics (pay gap and total remuneration)	Remuneration metrics (S1-16) (Section 3.1.10)
		S1-17 Incidents, complaints and severe human rights impacts	Incidents and complaints and severe human rights impacts (S1-17) (Section 3.1.11)
ESRS S2	Workers in the value chain	S2 SBM-2 Interests and views of stakeholders	Interests and views of stakeholders (SBM-2) (Section 3.2.1)
		S2-SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities (SBM-3) (Section 3.2.2)

		S2-1 Policies related to value chain workers	Policies related to value chain workers (S2-1) (Section 3.2.3)
		S1-2 Processes for engaging with value chain workers about impacts	Processes for engaging with value chain workers about impacts (S2-2) (Section 3.2.4)
		S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns	Processes to remediate negative impacts and channels to raise concerns (S2-3) (Section 3.2.5)
		S2-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	Actions related to value chain workers (S2-4) (Section 3.2.6)
		S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to value chain workers (S2-5) (Section 3.2.7)
ESRS G1	Business conduct	ESRS-2 GOV-1 The role of the administrative, supervisory and management bodies	The role of the administrative, management and supervisory bodies (GOV-1) (Section 1.2.1)
		ESRS-2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	Description of the process to identify and assess material impacts, risks and opportunities (IRO-1) (Section 1.4.1)
		G1-1 Business conduct policies and corporate culture	Business conduct policies and corporate culture (G1-1) (Section 4.1.1)
		G1-2 Management of relationships with suppliers	Management of relationships with suppliers (G1-2) (Section 4.1.2)
		G1-3 Prevention and detection of corruption and bribery	Prevention and detection of corruption and bribery (G1-3) (Section 4.1.3)
		G1-4 Incidents of corruption and bribery	Prevention and detection of corruption and bribery (G1-3) (Section 4.1.3)
		G1-6 Payment practices	Payment practices (G1-6) (Section 4.1.4)

5.2 List of datapoints in cross-cutting and topical standards that derive from other EU legislation

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU climate law reference	Materiality	Reference Sustainability Report
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27), Annex II		Material	The role of the administrative, management and supervisory bodies (GOV-1)1.2.1
ESRS 2 GOV-1 Percentage of board members who are			Delegated Regulation (EU) 2020/1816, Annex II		Material	The role of the administrative, management and supervisory



independent paragraph 21 (e)						bodies (GOV-1) Section 1.2.1
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				Material	Statement on sustainability due diligence (GOV-4) Section 1.2.4
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Material	N/A – OP Group is not involved in fossil fuel activities (see Business model, SBM-1) Section 1.3.1
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Material	N/A – OP Group is not involved in chemical production (see Business model, SBM-1) Section 1.3.1
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (29) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Material	N/A - no involvement (SBM-1) Section 1.3.1
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Material	N/A - no involvement (SBM-1) Section 1.3.1
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Material	Transition plan for climate change mitigation (E 1-1) Section 2.1.2
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk:	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Material	N/A



		Credit quality of exposures by sector, emissions and residual maturity				
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Material	Targets related to climate change mitigation and adaptation (E1-4) Section 2.1.5
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				Material	Energy consumption and mix (E1-5) Section 2.1.6
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				Material	Energy consumption and mix (E1-5) Section 2.1.6
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Material	Energy consumption and mix (E1-5) Section 2.1.6
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Material	Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6) Section 2.1.7



ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Annex 1 Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Material	Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6) Section 2.1.7
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Material	N/A
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Material	Use of phase-in provision
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Material	Use of phase-in provision
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateral			Material	Use of phase-in provision



		alized by immovable property – Energy efficiency of the collateral				
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Material	Use of phase-in provision
ESRS E2-4 Amount of each pollutant listed in Annex II of the E- PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not material	-
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Material	Use of the delegated act "Quick Fix" (extension of the phased-in disclosure requirements according to ESRS 1 Annex C)
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Material	Use of the delegated act "Quick Fix" (extension of the phased-in disclosure requirements according to ESRS 1 Annex C)
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Material	Use of the delegated act "Quick Fix" (extension of the phased-in disclosure requirements according to ESRS 1 Annex C)
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table				Material	Use of the delegated act "Quick Fix" (extension of the



	#2 of Annex 1					phased-in disclosure requirements according to ESRS 1 Annex C)
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Material	Use of the delegated act "Quick Fix" (extension of the phased-in disclosure requirements according to ESRS 1 Annex C)
ESRS 2- SBM 3 - E4 paragraph 16 (a)	Indicator number 7 Table #1 of Annex 1				Not material	-
ESRS 2- SBM 3 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Not material	-
ESRS 2- SBM 3 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Not material	-
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Not material	-
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Not material	-
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Not material	-
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Material	Resource outflows (E5-5) Section 2.3.6
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Material	Resource outflows (E5-5) Section 2.3.6
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex 1				Not material	-



ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Not material	-
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Material	Policies related to OP Group's own workforce (S1-1) Section 3.1.3
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Material	Policies related to OP Group's own workforce (S1-1) Section 3.1.3
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				Not material	-
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				Material	Policies related to OP Group's own workforce (S1-1) Section 3.1.3
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				Material	Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3) Section 3.1.5
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material	-
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Not material	-
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material	Remuneration metrics (S1-16) Section 3.1.10
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Material	Remuneration metrics (S1-16) Section 3.1.10
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Material	Incidents and complaints and severe human rights impacts (S1-17) Section 3.1.11



ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	Incidents and complaints and severe human rights impacts (S1-17) Section 3.1.11
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11	Indicators number 12 and n. 13 Table #3 of Annex I				Material	Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3) Section 3.2.2
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Material	Policies related to value chain workers (S2-1) Section 3.2.3
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Material	Policies related to value chain workers (S2-1) Section 3.2.3
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Material	Policies related to value chain workers (S2-1) Section 3.2.3
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Material	Policies related to value chain workers (S2-1) Section 3.2.3
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Material	Actions related to value chain workers (S2-4) Section 3.2.6
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material	-



ESRS S3-1 non- respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	-
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material	-
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Not material	-
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	-
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Not material	-
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				Material	Business conduct policies and corporate culture (G1-1) Section 4.1.1
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				Material	Business conduct policies and corporate culture (G1-1) Section 4.1.1
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		Material	Prevention and detection of corruption and bribery (G1-3) Section 4.1.3
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				Material	Prevention and detection of corruption and bribery (G1-3) Section 4.1.3

5.3 List of Phased-in Disclosure Requirements (ESRS 1 Appendix C)

ESRS	Disclosure Requirement	Description	Use of Phase-in Provision
ESRS 2	SBM-1 40(b) and (c)	Strategy, business model and value chain (breakdown of total revenue by significant ESRS sector and list of additional significant ESRS sectors)	Yes
ESRS 2	SBM-3 48(e)	Material impacts, risks and opportunities and their interaction with strategy and business model (anticipated financial effects)	Yes

ESRS E1	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Yes
ESRS E4	All disclosure requirements	All disclosure requirements (for biodiversity and ecosystems)	N/A
ESRS E5	E5-6	Anticipated financial effects from resource use and circular economy-related risks and opportunities	Yes
ESRS S1	S1-7	Characteristics of non-employee workers in the undertaking's own workforce (all data points)	Yes
ESRS S1	S1-8	Collective bargaining coverage and social dialogue (data points for own employees in non-EEA countries)	Yes
ESRS S1	S1-11	Social protection (all data points)	Yes
ESRS S1	S1-13	Training and skills development (all data points)	Yes
ESRS S1	S1-14	Health and safety (data points on cases of work-related ill-health and number of days lost to injuries, accidents, fatalities, and work-related ill health)	Yes
ESRS S1	S1-14	Health and safety (data points regarding non-employee workers)	Yes
ESRS S2	All disclosure requirements	All disclosure requirements (for workers in the value chain)	No
ESRS S3	All disclosure requirements	All disclosure requirements (for affected communities)	N/A

5.4 Abbreviations

Abbreviation	Meaning
AR	Application Requirement
B2B	Business-to-Business
B2B2C	Business-to-Business-to-Consumer
B2C	Business-to-Consumer
BIO	Biodiversity and Ecosystems
BP	Basis for preparation
CapEx	Capital Expenditures
CCA	Climate Change Adaptation
CCM	Climate Change Mitigation
CDA	Climate Delegated Act
CE	Circular Economy
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CO ₂	Carbon Dioxide
CO ₂ eq	Carbon Dioxide Equivalent
CSR	Corporate Social Responsibility
CSRD	Corporate Sustainability Reporting Directive
DE	Germany
DEFRA	Department for Environment, Food & Rural Affairs
DEI	Diversity, Equity, and Inclusion
DK	Denmark
DMA	Double Materiality Assessment
DNSH	Do-No-Significant-Harm

E	Environmental
EDA	Environmental Delegated Act
EFRAG	European Financial Reporting Advisory Group
eNPS	Employee Net Promoter Score
ESG	Environmental, Social & Governance
ESRS	European Sustainability Reporting Standards
EU	European Union
FSC®	Forest Stewardship Council
FTE	Full Time Equivalent
G / GOV	Governance
GDPR	General Data Protection Regulation
GHG	Greenhouse Gas
GRAKOM	Danish Association for Communication, Design & Media
H&S	Health and Safety
IAS	International Accounting Standards
ICS	Internal Control System
IFRS	International Financial Reporting Standards
ILO	International Labor Organization
IPCC	Intergovernmental Panel on Climate Change
IRO	Impacts, Risks & Opportunities
ISO	International Organization for Standardization
KPI	Key Performance Indicator
kWh	kilowatt-hour
LDPE	Low-Density Polyethylene
LFP	Large Format Printing
LTIF	Lost Time Injury Frequency
MWh	Megawatt-hour
NF3	Nitrogen Trifluoride
NGFS	Network for Greening the Financial System
OECD	Organisation for Economic Co-operation and Development
OP	Onlineprinters
OpEx	Operating Expenses
PE	Polyethylene
PEFC	Programme for the Endorsement of Forest Certification Schemes
PET	Polyethylenterephthalat
PL	Poland
PP	Polypropylen
PPC	Pollution Prevention and Control
PPE	Personal Protective Equipment
PP&E	Plant, Property and Equipment
PVC	Polyvinylchlorid
RMS	Risk Management System
SBM	Strategy and business model

S	Social
SBTi	Science Based Targets Initiative
SDF	Sustainable Development Fund
SDG	Sustainable Development Goals
SE	Sweden
SSP	Shared Socioeconomic Pathways
t	Tons
tCO ₂ eq	Tons Carbon Dioxide Equivalent
TCFD	Task Force on Climate-related Financial Disclosures
TEUR	Thousand Euros
TSC	Technical Screening Criteria
UK	United Kingdom
UN	United Nations
VCA	Dutch Standard for Safety, Health and Environment
WTR	Water and marine resources