

# Sustainability report 2025

CSC – IT Center for Science

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# Managing Director's review

CSC, as a company entrusted with a special state assignment, plays a unique role in supporting Finnish research, education and the public sector. Sustainability is an integral part of our core mission and of how we create value for society. Our objective is to minimize the negative impacts of our operations and strengthen our positive handprint together with our stakeholders.

The year 2025 further reinforced CSC's position as a national and European research infrastructure provider. The installation of Finland's next national supercomputer, Roihu, began in the autumn, and its future use for also analyzing sensitive data will open new possibilities for secure and reliable research.

A major step towards next-generation scientific breakthroughs was taken as the LUMI AI Factory was launched. The services it provides enable the responsible development of artificial intelligence in research and businesses, utilizing world-class computing power, data and expert support. CSC



coordinates the consortium hosting the LUMI AI Factory, which includes, in addition to Finland, Norway, Poland, Denmark, the Czech Republic and Estonia, with Belgium, Iceland, Latvia and Switzerland participating as antenna partners.

The high demand for the LUMI supercomputer's resources and the plans for an AI-optimized LUMI AI supercomputer demonstrate the growing importance of artificial intelligence in research and societal decision-making. LUMI is already used, for example, to model climate change and biodiversity loss, supporting science-based and sustainable decision-making.

Promoting digital sovereignty and openness, CSC contributes to European initiatives such as the development of the Open Web Index and the OpenWebSearch.eu project, which aim to strengthen the European digital landscape. The open web index provides a European alternative that adheres to European values and regulations, including the AI Act and the General Data Protection Regulation.

The importance of digital services in supporting research, education, and public administration continued to grow in 2025. The use of CSC's digital preservation services increased, and the growing use of the internationally unique EXAM digital examination system further advanced accessibility, equity and quality in education.

The adoption of artificial intelligence in higher education and research progressed concretely during the year. CSC's AITO framework provides higher education institutions and research organizations with tools for structuring the impacts of AI, supporting a responsible, ethically sustainable and strategically guided transition in teaching, research and innovation activities.

Customer feedback has remained a central part of the development of our services and operations. The results from 2025 showed that our customers particularly value the reliability of our services, our expertise, and smooth cooperation. According to the user survey for research services, the Net Promoter Score (NPS) was 62.

Competent and well-being personnel are the foundation of CSC's operations. Employee satisfaction remained at a good level, and CSC was ranked among the most attractive employers in the IT sector in Universum's survey. As part of our long-term sustainability efforts, we continued to invest in competence development, well-being at work and opportunities for young people to become familiar with expert work.

**Kimmo Koski**  
CEO



# General information

## Basis for preparation

The Sustainability Report for 2025 has been guided by the Corporate Sustainability Reporting Directive (CSRD) and the associated European Sustainability Reporting Standards (ESRS).

The report has been prepared at the CSC level and describes the company's sustainability work, operations, and value chain. The reported topics are based on the double materiality assessment conducted in 2023–2024, the results and process of which are presented in the section "Description of the process to identify and assess material impacts, risks and opportunities."

The quality and reliability of the reported information are ensured as part of the sustainability reporting process. The process includes clear divisions of responsibility, approval procedures, and internal controls that help manage identified risks. This ensures that the reported information is consistent, verifiable, and aligned with stakeholder expectations.

## Governance

### Role of, information provided to and sustainability matters addressed by the administrative, management and supervisory bodies

#### Board of Directors

CSC's Board of Directors (the Board) promotes the company's interests and supervises its accounting, financial management, performance development, and governance. It addresses all matters of significant importance to CSC's operations, such as the strategy, budget, major investments, and principles of risk management. The Board is responsible for sustainability at CSC.

The members of the Board have extensive experience relevant to CSC's sector and services. According to the Articles of Association, the Board consists of four to seven ordinary members. In 2025, the Ministry of Education and Culture appointed five members to the Board, while higher education institutions appointed two members. In line with the Government Resolution on State Ownership Policy, the State appoints individuals whose expertise creates added value for the company and who understand the State's objectives. In this policy, sustainability expertise is one of the key criteria for the selection of board members. CSC's

Board of Directors is appointed for one year at a time and meets at least five times a year.

CSC's Board members in 2025 were:

- **Jukka Mönkkönen**, PhD, Professor, University of Eastern Finland (CSC Board Member 2019–, Chair 2021–)
- **Riitta Autere**, MA, Ministerial Adviser, Public Sector ICT Department, Ministry of Finance; areas of responsibility include information policy, steering of public-sector ICT development and open data (CSC Board Member 2021–)
- **Laura Eiro**, L.M., Director-General, Data, Safety and Security Department, Ministry of Transport and Communications (CSC Board Member 2022–)
- **Tua Huomo**, PhD, MBA, Executive Vice President and member of the Executive Leadership Team, VTT Technical Research Centre of Finland (CSC Board Member 2020–)
- **Hannu Kempainen**, Lic.Sc. (Tech.), Director (Strategy) and member of the Management Group, Business Finland (CSC Board Member 2021–)
- **Petri Myllymäki**, PhD, Professor of Artificial Intelligence and Machine Learning, Department of Computer Science, University of Helsinki (CSC Board Member 2021–)
- **Petri Raivo**, PhD, President and CEO, Karelia University of Applied Sciences (CSC Board Member 2023–)

The share of independent Board members is 100%.

## Remuneration of the Board

	Total paid remuneration	Remuneration and attendance fee
Chair of the Board	EUR 24 000	EUR 1,700/month EUR 600/meeting
Vice chair	EUR 18 000	EUR 1,200/month EUR 600/meeting
Other Board members	EUR 81 000	EUR 1,000/month EUR 600/meeting

## Gender diversity of the Board

	Number of Board members	Share of Board members
Male	4	57%
Female	3	43%

During the reporting period, the Board addressed the following sustainability-related topics:

- Financial monitoring and guidelines for the management of funds
- Sustainability perspectives in the company's new strategy
- Results of the personnel survey
- Performance bonus criteria and awarding of bonuses
- Sustainability governance model
- Sustainability targets for 2025
- Risk management policy
- The company's strategic risks for 2025, including residual risks
- External assessment of the company's cost accounting and pricing
- Development of the company's salary system

## Managing Director and Management Group

CSC's business operations and the achievement of its objectives are directed by the Managing Director in accordance with the Limited Liability Companies Act, other applicable legislation, the Board's instructions and the approved strategy. The Managing Director is responsible for implementing CSC's strategy and achieving its objectives, including those related to sustainability. Supported by the Management Group, the Managing Director ensures the integration of sustainability into the company's planning, resource

allocation, and performance management. The Managing Director is responsible for overall sustainability of CSC's operations and the company's sustainability governance model.

The Managing Director is supported by the Management Group whose members' expertise covers CSC's business, partnerships, public affairs and finances. The Management Group discusses, and the Managing Director approves, company-level sustainability policies, targets, commitments and the outcomes of the materiality assessment. The Management Group is supported by the company's sustainability function, which provides expertise in identifying, managing, and developing sustainability matters.

In 2025, CSC's Managing Director was **Kimmo Koski**, PhD (Tech.), who has been employed by CSC since 2004. The other members of the Management Group were:

- **Tiina Kupila-Rantala** (PhD, MBA), Deputy Managing Director since 2011, Director responsible for DEI matters, employed by CSC since 2001
- **Janne Kanner** (M.Sc.), Director, Services for Data Management, employed by CSC since 1999
- **Teemu Kiviniemi** (M.Sc. (Tech.)), Director, Shared ICT Solutions, Director responsible for climate issues, employed by CSC since 2008

- **Irina Kupiainen** (M.Soc.Sc., eMBA), Director, Public Affairs, employed by CSC since 2012
- **Damien Lecarpentier** (PhD), Director, International Collaborations and Partnerships, employed by CSC since 2009
- **Kimmo Niittuaho** (M.Sc. (Econ.)), Chief Financial Officer, Director responsible for sustainability, employed by CSC since 2003
- **Hanna-Mari Puuska** (PhD), Director, Digital Services, employed by CSC since 2010
- **Mari Walls** (PhD, Professor), Director, Research Organization Collaboration and Academic Partnerships, Director responsible for customer relations, employed by CSC since 2023
- **Per Öster** (PhD), Director, Scientific Computing, employed by CSC since 2007
- **Tomasz Malkiewicz** (PhD), Senior Application Specialist, personnel representative, employed by CSC since 2011

### Gender diversity of the Management Group

Gender	Number of Management Group members	Share of Management Group members
Male	7	64%
Female	4	36%

During the reporting period, the Management Group addressed the following sustainability-related topics:

- Regular financial monitoring
- External assessment of the company's cost accounting and pricing
- Results of the personnel survey
- Update of the Code of Ethics
- Development of the salary system
- Update of the risk management policy
- Data protection and information security reviews
- Update of the information security policy
- Results of customer surveys
- Reform of the management system
- Sustainability targets for 2025
- Sustainability governance model

### Advisory Council

CSC's owners (70% the State of Finland, 30% Finnish higher education institutions) have organized their ownership cooperation by drafting a shareholder agreement and establishing a joint advisory council. The Council is appointed for a two-year term and consists of ten members: five appointed by the State and five by higher education institutions. The chairperson is also appointed by the State. The Advisory Council promotes the interests of the owners, prepares the ownership strategy for the company, and monitors its implementation. In the ownership strategy for

2025–2028, the key themes for sustainability work are defined as sustainability in value chains, social sustainability, and biodiversity and the green transition.

In 2025, the Chair of the Advisory Council was **Jussi-Pekka Moisio**, Director of Administration at the Ministry of Education and Culture, and the Secretary was **Juho-Antti Jantunen**, Senior Ministerial Adviser at the Ministry of Education and Culture. The other members of the Advisory Council were:

- **Erja Heikkinen**, Director, Ministry of Education and Culture
- **Minna Karvonen**, Director, Ministry of Education and Culture
- **Anne Portaankorva**, Vice-Rector, University of Helsinki
- **Mika Tervonen**, Chief Digital Officer, Tampere University
- **Jani Leino**, Chief Digital Officer, University of Turku
- **Mervi Vidgrén**, Rector and CEO, Savonia University of Applied Sciences
- **Jari Multisilta**, Rector and CEO, Satakunta University of Applied Sciences
- **Mikko Mäkipää**, Director, Finnish Institute of Occupational Health

### Practical organization of sustainability work

The management of sustainability and the coordination of practical sustainability-related actions are carried out through CSC's standard management system.

In 2025, CSC adopted a sustainability governance model that defines the structures, roles, and responsibilities for managing sustainability. The purpose of the model is to ensure that sustainability is an integral part of CSC's strategic and operational decision-making.

### **Incorporation of sustainability-related performance into incentive schemes**

The performance bonus system complies with the guidelines set out in the Government Resolution on State Ownership Policy (23 May 2024) and is based on the annual decision of CSC's Board of Directors regarding the distribution of performance bonuses. The determination of performance bonuses for personnel and management is influenced by the achievement of the company's objectives and individual performance. When deciding on the allocation of performance bonuses, the Board assesses the achievement of the 2025 performance targets and key results, and considers progress made toward the sustainability targets set for 2025.

The performance bonus system for personnel and management is being further developed. Sustainability will be more strongly integrated into the remuneration framework of top management starting from 2026.



# Strategy

## Strategy, business model and value chain

### Business model

CSC is a company entrusted with a special state assignment, owned by the State of Finland (70%) and Finnish higher education institutions (30%) with varying shares. CSC develops and provides internationally high-quality ICT expert services for research, education, culture, public administration and enterprises. The company plays an important role as an instrument of the Ministry of Education and Culture in steering and developing education, science and cultural policy, and its international activities support the vitality of the Finnish research community and education system.

CSC's services cover the FUNET data network and its related services, digital services for education, expert services, data warehouse services, and the full range of data management and scientific computing services, including open research data, digital preservation, sensitive data services, and the national high-performance computing ecosystem. In addition, CSC provides services for the joint Digivisio 2030 programme of 37 Finnish higher education institutions. CSC acts, under a mandate from the Ministry of

Education and Culture and as selected by the EU and its Member States through the EuroHPC Joint Undertaking, as the host organization of the LUMI supercomputer ecosystem.

The company's total revenue for the reporting period was 98.8 million euros (incl. other operating income).

### Value chain

CSC plays a key role in supporting the digital infrastructure of Finnish research, education and public administration. CSC develops its services in extensive cooperation, also as part of various national and international networks. In competitive funding projects, CSC works together not only with foreign partners but also with national customers.

One of CSC's most important resources is expertise. Adequate expertise is ensured by investing in personnel engagement and competence development. In addition, value-creating cooperation with networks, partnerships and individuals working under consultancy agreements plays a key role.

The data center ecosystem in Kajaani enables competitive data management and computing services and supports the development of partnerships. CSC's ISO/IEC 27001 certified

information security management system covers the Kajaani data centers, demonstrating the company's commitment to a high level of security.

CSC selects hardware suppliers on the basis of competitive tendering. As a rule, contracts are multiannual and include not only equipment purchases but also services, such as consulting, installation and maintenance contracts. This applies to both equipment intended for the company's own activities and the infrastructure offered to customers. Consulting agreements are resorted to especially in the development and provision of education services and in the work of the Digivisio programme office. CSC also uses off-the-shelf, commercial IT services as part of its own activities as well as the services offered to customers.

CSC offers its customers and owners cost-effective, safe and interoperable research environments as well as services that enable smooth everyday research, learning and teaching. CSC's services enable the use of science in decision-making. CSC's expertise, networks, and experts help to secure RDI funding for areas of national importance.

Key user groups include researchers, teachers and students in higher education institutions and research

institutes; public administration actors such as ministries and government agencies; and companies.

### Strategy and sustainability

Sustainability is a cross-cutting theme in CSC's strategy for 2025–2030 and must be considered in achieving all strategic objectives. The focus areas of sustainability are:

- sustainability in value chains (business ethics, human rights)
- social responsibility (employer role, diversity)
- green transition and biodiversity

These themes have also been identified as important in the ownership strategy prepared by the Advisory Council. CSC's values, vision, and strategic targets are presented on [CSC's website](#).

The company defines annual strategy-driven objectives and key results in line with the OKR model. All target setting takes into account risk management, customer centricity and sustainability perspectives. CSC's Management Group and Board of Directors review progress towards objectives using measurable key results every four months.

CSC is a member of the UN Global Compact Network Finland and is committed to promoting the Ten Principles of the United Nations Global Compact and the UN Sustainable Development Goals. The UN Global Compact is the United Nations' corporate responsibility initiative. In 2025, CSC participated in the following training programmes and peer-learning groups:

- DEI Peer-Learning Group
- SDG Ambition Accelerator Programme
- Business and Human Rights Accelerator Programme
- Climate Group

### Sustainability programme

CSC has developed a Sustainability Programme based on the 2023 materiality assessment. The programme is built around the most material sustainability topics for CSC. The Sustainability Programme is presented on [page 12](#).

### Stakeholder interests and views

Open and active interaction with stakeholders is particularly important for CSC's operations. Through dialogue, CSC strengthens stakeholder relationships and improves understanding of stakeholder expectations and needs, enabling better joint responses. Key stakeholders and the interaction with them are described in the table *Interaction with Key Stakeholders*.

# CSC's Sustainability Programme



## Our contribution



### CSC for research and education

We enable impactful research, innovation and digitalisation for higher education, research and cultural organisations by providing access to data, tools and expertise.



## Our core

### CSC for our planet

We minimise our environmental footprint throughout the value chain, improve resource efficiency, and promote the circular economy.

### CSC for our people

We ensure our personnel's holistic well-being, embed diversity and inclusion in our culture and practices, and enable continuous learning for our employees.

## Our foundation

### CSC for ethical business

We uphold high standards and good corporate governance. We expect our partners and suppliers to commit to the same values. We ensure compliance, data security and privacy and foster transparency.

Interaction with key stakeholders

Stakeholders and engagement	Owners	Customers	Personnel	Service users	Project and network partners	Suppliers of equipment, goods and services	Research infrastructure funders	Authorities, local communities and other organizations	The public
<b>Organization</b>	<ul style="list-style-type: none"> <li>Owners as CSC's customers</li> <li>Council</li> <li>CSC management's meetings with the Ministry of Education and Culture</li> </ul>	<ul style="list-style-type: none"> <li>Customer steering and steering co-operation between higher education and research ICT</li> <li>Customer events and training</li> <li>Customer satisfaction surveys, incl. T-Media's Reputation &amp; Trust survey for rectors of higher education institutions and heads of research institutes</li> </ul>	<ul style="list-style-type: none"> <li>Dialogue between the employee and the supervisor</li> <li>Annual development discussions</li> <li>Annual personnel survey</li> <li>Cooperation with personnel representatives (incl. CSC dialogue)</li> <li>Information events for personnel four times a year</li> </ul>	<ul style="list-style-type: none"> <li>Service use, training and technical support</li> <li>Annual survey addressed to data management and computing service users</li> <li>User surveys, feedback and mapping of user experience regarding other services</li> </ul>	<ul style="list-style-type: none"> <li>National and international networks</li> <li>Joint projects</li> </ul>	<ul style="list-style-type: none"> <li>Price and other negotiations</li> <li>Regular quality/development and other meetings, feedback from suppliers</li> <li>Consultants as CSC team members</li> </ul>	<ul style="list-style-type: none"> <li>Commenting on the preparation of EU funding programmes</li> <li>Regular contacts with funders</li> <li>Reporting as agreed</li> </ul>	<ul style="list-style-type: none"> <li>Statements for preparation of national and European decisions</li> <li>Expert role in committee hearings</li> <li>Open dialogue with authorities, decision-makers and local communities</li> <li>Data center visits for stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>Active contact with media representatives</li> <li>Systematic media tracking</li> <li>CSC.fi website</li> <li>Social media channels</li> </ul>
<b>Objective</b>	<ul style="list-style-type: none"> <li>Carrying out our special assignment cost-effectively and to a high standard</li> <li>Healthy finances, sustainability and social impact</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring cost-effective services and customer support that meet the needs</li> <li>Understanding customer needs</li> </ul>	<ul style="list-style-type: none"> <li>Competence development, good management and ensuring well-being at work</li> <li>Consultation of personnel about decisions concerning them</li> <li>Open, topical and trustworthy interaction</li> </ul>	<ul style="list-style-type: none"> <li>Developing competence in more efficient service use</li> <li>Understanding user needs</li> </ul>	<ul style="list-style-type: none"> <li>Mapping new funding and cooperation opportunities</li> <li>Development of competence, services and infrastructure</li> <li>Supporting cooperation between Finnish and international researchers</li> </ul>	<ul style="list-style-type: none"> <li>Open cooperation</li> <li>Long-term agreements</li> <li>Equal treatment</li> <li>Sustainability throughout the value chain</li> </ul>	<ul style="list-style-type: none"> <li>Promoting aspects that are essential for customers in funding programme wordings</li> <li>Success in projects</li> <li>Responsible cost monitoring and reporting of results</li> </ul>	<ul style="list-style-type: none"> <li>Making the digitalization needs of RDI and education visible for the benefit of customers and the whole country</li> <li>Cooperation with local community representatives in Kajaani</li> </ul>	<ul style="list-style-type: none"> <li>Open and timely communications</li> <li>Availability</li> <li>Providing expert opinions</li> <li>Following and participating in public debate</li> </ul>
<b>Addressed in the strategy and business model</b>	<ul style="list-style-type: none"> <li>The company strategy implements the ownership strategy prepared by the Council</li> <li>Owners' representatives were interviewed in connection with the materiality assessment</li> </ul>	<ul style="list-style-type: none"> <li>Service and development activities are based on interaction and working together</li> <li>Use of feedback in strategy work</li> <li>Customer representatives were interviewed in connection with the materiality assessment</li> </ul>	<ul style="list-style-type: none"> <li>CSC's People Agenda prioritizes personnel-related themes and supports the implementation of the company's strategy</li> <li>The personnel were engaged in materiality assessment workshops</li> </ul>	<ul style="list-style-type: none"> <li>User-centric service development</li> </ul>	<ul style="list-style-type: none"> <li>International collaboration enables us to provide services that we could not develop alone</li> </ul>	<ul style="list-style-type: none"> <li>CSC uses framework agreements put out to tender by Hansel</li> <li>Essential information security requirements are included in the invitation to tender</li> <li>The procurement guidelines instruct purchasers to examine environmental factors over the full life cycle of the product or service</li> </ul>	<ul style="list-style-type: none"> <li>New funding opportunities help secure high-quality services for higher education institutions and research institutes</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring operating conditions significant for the company's activities</li> </ul>	<ul style="list-style-type: none"> <li>Bolstering the company's public image</li> <li>Reinforcing trust</li> </ul>

# Impact, risk and opportunity management

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

CSC's materiality assessment defines the most important sustainability topics for the organization. CSC's materiality assessment was carried out in 2023–2024 as a two-phase process. In 2023, the key impacts on people and the environment were identified, and business-related sustainability risks and opportunities were assessed. In 2024, the assessment was expanded and refined in accordance with the European Sustainability Reporting Standards (ESRS), including the development of evaluation scales and the definition of materiality thresholds.

The process included background research, internal workshops, interviews, and a survey addressed to the Management Group. Stakeholder insights were particularly important for understanding the expectations of CSC's owners and customers. The work was carried out in collaboration with Impaktly.

The materiality assessment identified CSC's most significant impacts, risks and opportunities across its own operations and throughout the different stages of the value chain.

As a result of the assessment, approved in 2024, seven material sustainability themes were identified. These themes guide CSC's sustainability work and reporting. The results are reviewed annually to identify the need for updates. In 2025, the results were reviewed with

the directors responsible for each sustainability topic. The presentation of the results was clarified, but no need for updates was identified.

The director responsible for sustainability oversees the process of identifying, assessing and managing impacts, risks, and opportunities. CSC's Management Group discusses, and the Managing Director approves, the results of the materiality assessment. The Board of Directors is consulted as part of the process. The risk management process is used as one of the information sources when determining material sustainability topics.

A more detailed description of the execution and results of the materiality assessment can be found in [CSC's 2024 Sustainability Report \(pp. 14–17\)](#).

## Phases of CSC's double materiality assessment conducted in 2023–2024



**Material impacts, risks and opportunities, and sustainability topics, sub-topics and sub-sub-topics**

Impacts, risks and opportunities	Sub-sub-topic	Sub-topic
<b>E1 Climate change</b>		
<ul style="list-style-type: none"> <li>CSC's supercomputers as enablers of climate research</li> <li>Demand for services that enable climate research is increasing</li> <li>Effects of rising temperatures on data center cooling</li> </ul>		Climate change adaptation and mitigation
<ul style="list-style-type: none"> <li>Negative impacts of energy use in data centers</li> <li>Energy efficiency and the use of renewable energy as a competitive advantage</li> <li>Changes in the price and availability of energy</li> <li>Positive impacts of green IT practices and sharing them with customers</li> <li>Availability and cost of critical components</li> </ul>		Energy
<b>E4 Biodiversity and ecosystems &amp; E5 Resource use and circular economy</b>		
<ul style="list-style-type: none"> <li>Enabling research</li> </ul>		
<b>S1 Own workforce</b>		
<ul style="list-style-type: none"> <li>Preserving and acquisition of critical competence</li> </ul>		
<ul style="list-style-type: none"> <li>Employees' holistic well-being</li> </ul>	Work-life balance Health and safety	Working conditions
<ul style="list-style-type: none"> <li>Positive impacts related to promoting diversity, equity and inclusion</li> <li>Rich and diverse work community as a resource</li> </ul>	Diversity	Equal treatment and opportunities for all
<ul style="list-style-type: none"> <li>Comprehensibility and transparency of remuneration criteria</li> <li>Creating a clear salary system supports employee engagement and motivation</li> </ul>	Gender equality and equal pay for work of equal value	
<ul style="list-style-type: none"> <li>Continuous learning and development</li> </ul>	Training and skills development	

Impacts, risks and opportunities	Sub-sub-topic	Sub-topic
<b>S2 Workers in the value chain</b>		
<ul style="list-style-type: none"> <li>Reputation as an attractive partner will increase the availability of competence</li> </ul>	Work-life balance Gender equality and equal pay for work of equal value	Working conditions Equal treatment and opportunities for all
<b>S4 Consumers and end-users</b>		
<ul style="list-style-type: none"> <li>Enabling high-quality education and collaboration between educational institutions</li> <li>Supporting regional equality in terms of education and lifelong learning</li> <li>Access to reliable research and data</li> <li>Efficient data management and open data bring savings and benefits to partners</li> </ul>	Access to (quality) information	Information-related impacts for consumers and/or end-users
<ul style="list-style-type: none"> <li>High information security, reliability and resilience</li> </ul>	Privacy	
<ul style="list-style-type: none"> <li>Positive impact on researchers and employees' workflows</li> <li>Digital preservation of cultural heritage for the benefit of Finns</li> <li>Streamlining the higher education institutions' application process</li> </ul>	Access to products and services	Social inclusion of consumers and/or end-users
<b>G1 Business conduct</b>		
<ul style="list-style-type: none"> <li>Promoting research collaboration</li> <li>Reputational risk in case of misconduct in the value chain</li> <li>Reputation based on reliability and transparency</li> </ul>		Corporate culture
<ul style="list-style-type: none"> <li>Stakeholder engagement and support for decision-making</li> </ul>		Political influence and lobbying activities

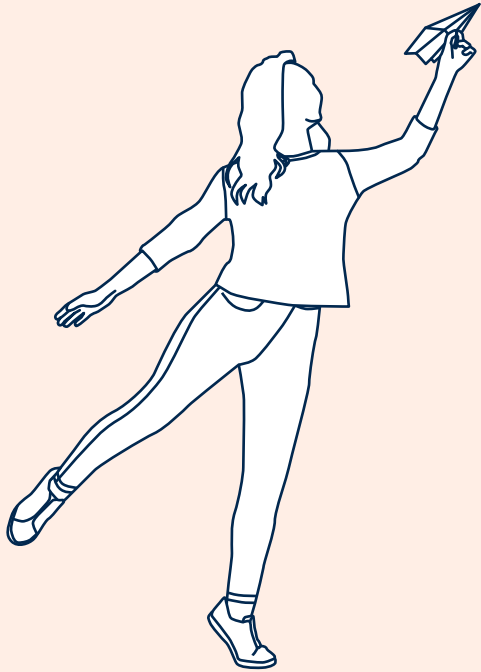
## Disclosure Requirements of the ESRS Standards Considered in the Company's Sustainability Statement

This section presents the disclosure requirements that have been included in the report and indicates where the related information can be found. The reported sustainability matters are based on the materiality assessment, which served as the foundation for identifying the key topics, sub-topics and more detailed sub-sub-topics. The selection of material datapoints was carried out using the flowchart in Annex E of the European Sustainability Reporting Standards (ESRS).

### List of material disclosure requirements

Standard	Disclosure requirement	Location in sustainability report
ESRS 2	BP-1	Basis for preparation
	BP-2	Basis for preparation; Metrics and targets (Climate change, Own workforce)
	GOV-1 – GOV-3	Governance
	GOV-5	Basis for preparation
	SBM-1 – SBM-2	Strategy
	SBM-3	Strategy (General information and in connection with each topic)
	IRO-1	Impact, risk and opportunity management, in more detail on the 2024 report
	IRO-2	Impact, risk and opportunity management
ESRS E1	GOV-3	Incorporation of sustainability-related performance into incentive schemes is presented in full in the Governance chapter
	E1-2	Policies related to climate change mitigation and adaptation
	E1-3	Actions and resources in relation to climate change policies
	E1-5	Metrics
	E1-6	Metrics

Standard	Disclosure requirement	Location in sustainability report
ESRS E4	SBM-3	Biodiversity and ecosystems & Resource use and circular economy
ESRS E5	SBM-3	Biodiversity and ecosystems & Resource use and circular economy
ESRS S1	SBM-2	Information related to stakeholders is presented in full in the Strategy chapter
	SBM-3	Material impacts, risks and opportunities and their management related to own workforce
	S1-1	Policies related to own workforce
	S1-2	Processes for engaging with own workers and workers' representatives about impacts
	S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns
	S1-4	Policies related to own workforce; Impact, risk and opportunity management
	S1-6 – S1-11	Metrics
	S1-13	Metrics
ESRS S2	S1-15	Metrics
	SBM-2	Information related to stakeholders is presented in full in the Strategy chapter
ESRS S4	SBM-3	Workers in the value chain
	SBM-2	Information related to stakeholders is presented in full in the Strategy chapter
ESRS G1	SBM-3	Consumers and end-users
	GOV-1	Information related to the role of administrative, management and supervisory bodies is presented in full in the Strategy chapter
	SBM-3	Business conduct
	G1-1	Business conduct policies
	G1-2	Procurement practices
	G1-5	Political influence and lobbying activities



# Environmental information

# Climate change

## Material impacts, risks, opportunities and their management related to climate change

Impacts	Risks and opportunities for CSC	Management
<b>Climate change adaptation and mitigation</b>		
<b>CSC's supercomputers as enablers of climate research</b> <i>Downstream value chain</i> The impact will increase over the long term.	<b>Demand for services that enable climate research is increasing</b> <i>Downstream value chain</i> The impact will increase over the long term.	<ul style="list-style-type: none"> <li>CSC offers its services for climate research.</li> <li>CSC leads and participates in international projects that develop digital twins and utilise the LUMI supercomputer. Read more in the <a href="#">Impact review</a>.</li> <li>Rising temperatures are taken into account in cooling solutions.</li> </ul>
	<b>Impacts of rising temperatures on data center cooling</b> <i>Own operations</i> The impact will increase over the long term.	
<b>Energy</b>		
<b>Negative impacts of data center energy use</b> <i>Own operations</i> The impact will increase over the long term.	<b>Energy efficiency and renewable energy use as a competitive advantage</b> <i>Downstream value chain</i> The impact will increase over the long term.	<ul style="list-style-type: none"> <li>CSC's data centers only use renewable energy with Guarantees of Origin.</li> <li>Efforts are made to improve the energy efficiency of data centers and supercomputers.</li> <li>The waste heat produced by LUMI data center is reused in the City of Kajaani's district heating network.</li> <li>Environmental criteria are applied in procurements.</li> </ul>
	<b>Changes in the price and availability of energy</b> <i>Own operations</i> The impact will increase over the long term.	
<b>Positive effects of green IT practices</b> <i>Downstream value chain</i> The impact will increase over the long term.	<b>Sharing of green IT practices with customers</b> <i>Downstream value chain</i> The impact will increase over the long term.	
	<b>Availability and price of critical components</b> <i>Upstream value chain</i> The impact will increase over the long term.	

## Impact, risk and opportunity management

CSC recognizes climate change as a key societal challenge and a strategically significant factor in its own operations. CSC contributes to climate change mitigation and adaptation both by reducing the negative impacts of its own operations and by generating positive impacts through enabling climate research and digital solutions that support the green transition.

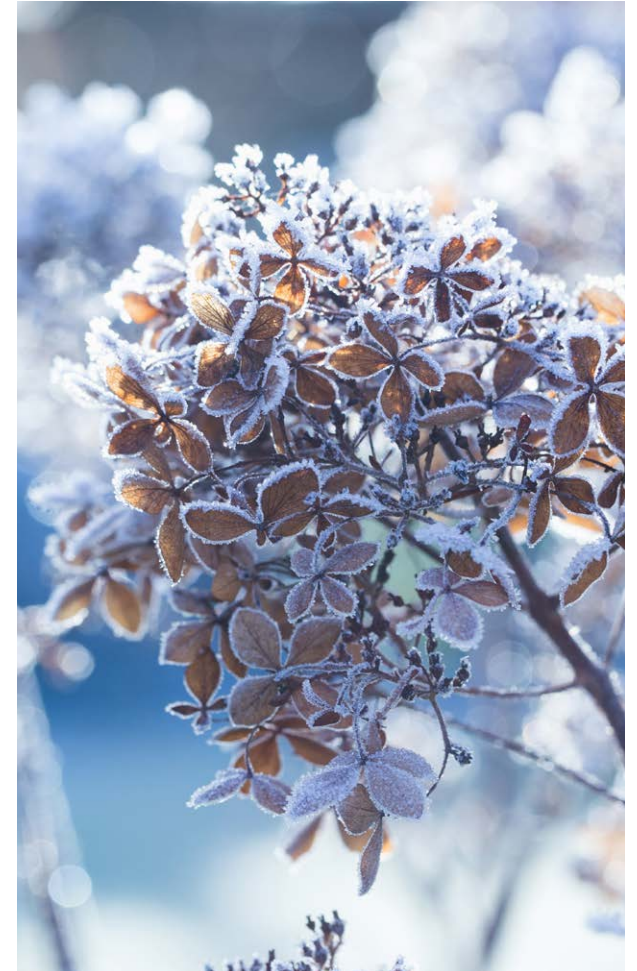
CSC reduces its negative environmental impacts by providing energy-efficient, shared, and correctly dimensioned digital services for its customers. CSC's largest climate impacts are linked to data center energy use and procurement. Data centers are an essential part of CSC's special assignment.

The LUMI data center located in Kajaani uses renewable electricity, and its waste heat is channeled into the local district heating network, reducing regional carbon dioxide emissions. The design of data center cooling solutions also takes into account the risks posed by climate change and rising temperatures, which particularly affect the technical requirements of summer-time cooling.

The need for energy-efficient and zero-emission solutions increase demand for CSC's efficient services that are based on renewable energy. CSC's data infrastructures and supercomputing services play a significant role in supporting climate and environmental research. In 2025, CSC continued its key role in the European Commission's Destination Earth (DestinE) programme, which develops a digital twin of the Earth to model climate change and support adaptation measures. Read more about digital twins in the [Impact review](#).

CSC's experts and services support multidisciplinary research that combines large datasets and helps improve the understanding of climate change mechanisms and mitigate its impacts. CSC supports customers in transferring, computing, compiling, describing, storing, analyzing, combining and applying data in ways that generate new insights for building a better future. By enabling research, CSC's services can support national and European climate targets.

Through its operations, CSC enhances the efficiency of data, code, and software, enabling greater output with the same resources. Optimization supports energy efficiency and cost management, as well as ensures maximizing the utilization of supercomputer capacity.



CSC's green IT practices guide positive impacts: improving data usage efficiency, reducing and reusing code, enhancing software performance, designing effective mechanisms for resource management in system architecture, and minimizing user errors through interface design. With these solutions, CSC also supports its customers in reducing emissions and improving energy efficiency.

In its data management services, CSC applies FAIR principles: making data findable, accessible, interoperable, and reusable. This enables greater reuse of existing data, avoids unnecessary re-gathering or reproduction, and reduces repeated transfers, thereby minimizing environmental impacts.

### **Policies related to climate change mitigation and adaptation**

In the "CSC for our planet" section of CSC's Sustainability Program, the objective is to minimize the environmental footprint throughout the entire value chain, improve resource efficiency, and promote circular economy.

The Sustainability Program is presented on [page 12](#).

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

In its offices and data centers in Espoo and Kajaani CSC purchases electricity from renewable energy sources and verified with Guarantees of Origin. In Espoo, district heating is also certified as renewable. Energy efficiency and the use of renewable energy have long been established practices at CSC.

The energy efficiency of CSC's data centers is continuously improved by optimizing capacity utilization and cooling solutions. In addition, the Espoo data center, commissioned in 2008, is being replaced with more energy-efficient data center solutions as operations in Espoo are transferred to Telia's data center in Helsinki. The new data center will use renewable energy, and its waste heat will be directed into the Helsinki district heating network.

### **Environmental criteria in procurement**

CSC uses Hansel's public procurement procedures, in which environmental aspects are taken into account. CSC's internal procurement guideline instructs purchasers to consider environmental factors throughout the lifecycle of a procurement. CSC also has dedicated guidance on environmental criteria in procurement. Currently, the guidance covers only some of the company's procurement categories,

but it will be expanded in the future to cover CSC's categories more comprehensively. Case-specific criteria are applied as appropriate. For example, energy efficiency is a key criterion in the procurement of data centres and supercomputers.

CSC's procurement practices are described in the "Governance information" chapter.

# Metrics

## Energy

### Energy consumption and mix

	2024	2025
<b>6) Total fossil energy consumption (MWh)</b>	25.4	36.8
Share of fossil sources in total energy consumption (%)	0.03%	0.05%
7) Consumption from nuclear sources (MWh)	5.3	5.3
Share of consumption from nuclear sources in total energy consumption (%)	0.01%	0.01%
8) Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0	0
9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	74,766.5	81,684.4
10) Consumption of self-generated non-fuel renewable energy (MWh)	0	0
<b>11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)</b>	74,766.5	81,684.4
Share of renewable sources in total energy consumption (%)	99.97%	99.95%
<b>Total energy consumption (MWh) (calculated as the sum of lines 6 and 11)</b>	74,791.9	81,709.5

The total consumption of energy from renewable sources includes metered consumption at CSC’s data centers and offices and the share of Espoo offices in the metered district heating consumption of the property. Fossil energy is consumed in a backup generator, whose consumption figure is a calculated estimate; district heating in Kajaani that is partly an estimate; and Kajaani office in which electricity is included in the rent. 2024 figures do not include district heating in Kajaani.

### Energy efficiency of data centers and utilization of waste heat

As of 2024, CSC publishes and reports including significant energy efficiency, water footprint and demand-response data required under Article 12 of the Energy Efficiency Directive (EED) to the EU Data Centre Database.

The cooling solution implemented for the EuroHPC LUMI supercomputer located in Kajaani enables the nearly year-round utilization of the supercomputer’s waste heat in the Kajaani district heating network, thereby reducing the city’s carbon footprint. The heat recovered from LUMI accounts for about ten percent of the total energy of the Kajaani district heating network.

Read more about the Kajaani data center ecosystem on [CSC’s website](#).

### Energy efficiency of data centers in 2025

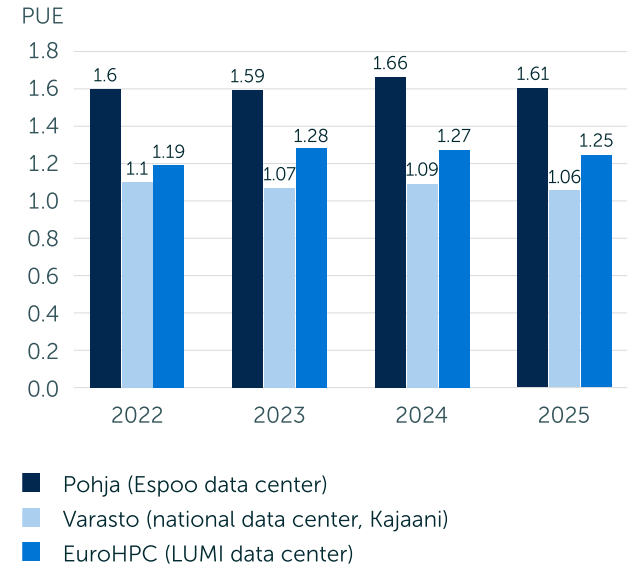
	PUE	WUE	ERE	Energy produced for heating (MWh)
EuroHPC (LUMI data center)	1.25	0.004	0.553	34,108.86
Varasto (national data center, Kajaani)	1.06	0.018		
Pohja (Espoo data center)	1.61	-		

Energy efficiency is measured as a PUE value (Power Usage Effectiveness). The PUE value does not provide a complete picture of energy efficiency, as the data center’s utilization rate should be accounted for. As PUE is the most common internationally used metric, it was chosen as an indicator due to its comparability:  $PUE = (\text{total energy}) / (\text{IT systems})$ .

WUE (Water Usage Effectiveness) measures the water usage efficiency of a data center. It tells you how much water is used for cooling in relation to the energy consumption of IT equipment.  $WUE = (\text{Data center water consumption (l)}) / (\text{IT equipment energy consumption (KWh)})$ .

Energy Reuse Effectiveness (ERE) takes into account waste heat recovery:  $ERE = (\text{total energy} - \text{reuse}) / (\text{IT systems})$ .

### CSC’s data centers’ energy efficiency in 2022–2025



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

The emission calculation has been carried out in accordance with the guidelines of the Greenhouse Gas Protocol (GHG Protocol Corporate Standard, GHG Protocol Scope 2 Guidance, and GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard). In 2025, the emission calculation has been developed with a more detailed categorization of emissions, adding previously missing emission sources and categories, and updated emission factors. The emissions for 2024 have been recalculated to correspond to the 2025 calculation. Scope 3 categories 8, 9, 10, 12, 13 and 14 are not applicable to CSC's operations.

## GHG intensity based on net revenue

	2024 (tCO <sub>2</sub> eq./ EUR million)	2025 (tCO <sub>2</sub> eq./ EUR million)	Change (%)
Total GHG emissions (location-based) per net revenue	106.65	98.89	-7.28%
Total GHG emissions (market-based) per net revenue	75.17	73.24	-2.56%
<b>Net revenue used to calculate GHG Intensity (incl. other operating income)</b>	95,456,411.8	98,774,435.47	<b>3.48%</b>

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

	2024	2025	Change (%)
<b>Scope 1 GHG emissions</b>			
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	4.41	38.47	772.50%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	
<b>Scope 2 GHG emissions</b>			
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	3,019.26	2,545.27	-15.70%
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	14.25	12.44	-12.72%
<b>Significant Scope 3 GHG emissions</b>			
Total Gross indirect (Scope 3) GHG emissions (tCO <sub>2</sub> eq)	7,156.53	7,183.77	0.38%
1 Purchased goods and services	4,784.99	4,508.21	-5.78%
2 Capital goods	892.80	1,158.85	29.80%
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	261.88	169.17	-35.40%
4 Upstream transportation and distribution	3.38	2.04	-39.58%
5 Waste generated in operations	19.77	10.19	-48.44%
6 Business travel	849.49	873.03	2.77%
7 Employee commuting	141.61	143.03	1.01%
15 Investments	202.61	319.25	57.57%
<b>Total GHG emissions</b>			
Total GHG emissions (location-based) (tCO <sub>2</sub> eq)	<b>10,180.20</b>	<b>9,767.51</b>	<b>-4.05%</b>
Total GHG emissions (market-based) (tCO <sub>2</sub> eq)	<b>7175.19</b>	<b>7,234.68</b>	<b>0.83%</b>

## Methodologies, significant assumptions and emissions factors and reporting boundaries

<p><b>Scope 1</b></p>	<p>The calculations are based on estimated consumption of a backup generator, and indirect sources have been used in the calculation. Annual consumption was estimated based on equipment supplier’s consumption figures and the estimated operating time. More accurate consumption data are not available with the current tools, and additional investments are not justified as the emissions are small and will be eliminated after 2026.</p> <p>Use of refrigerants is measured.</p> <p><b>Emission factors:</b> DEFRA 2025, <i>Gas oil</i> DEFRA 2025, <i>Refrigerant and other</i> GHG Protocol IPCC GWP values 2024</p>	<p><b>Scope 3: 3 Fuel and energy-related activities (not included in Scope1 or Scope 2)</b></p>	<p>See Scope 2.</p> <p><b>Emission factors:</b> DEFRA 2025, <i>Gas oil (WTT)</i> DEFRA 2025, <i>District heating (T&amp;D)</i> Greenstep Oy, 2025, <i>Loiste Lämpö Kajaani WTT (2023)</i> Carbon Data Intelligence, June 2025, <i>Electricity T&amp;D &amp; WTT Finland</i></p>
<p><b>Scope 2</b></p>	<p>The calculations are based on consumption figures in electricity and district heating bills. The total district heating consumption of Espoo premises has been allocated to the offices based on their surface areas. The district heating data for Kajaani is partly metered and partly estimated based on the office area. The electricity consumption included in the rent for the Kajaani offices is based on an estimate and its emissions have been calculated assuming that the electricity is not renewable.</p> <p>100% of the electricity purchased by CSC and district heating in Espoo has Guarantee of Origin.</p> <p><b>Emission factors:</b> Statistics Finland, 2025, <i>District heating 2023</i> Statistics Finland, 2025, <i>Electricity 2024</i> Finnish Energy, 2025, <i>Kajaani district heating 2024</i> Energy Authority, 2025, <i>Residual mix 2024</i></p>	<p><b>Scope 3: 4 Upstream transportation and distribution</b></p> <p><b>Scope 3: 5 Waste generated in operations</b></p>	<p>See 1 Purchased goods</p> <p>The figures for waste are based on waste management companies’ reports and the share allocated by the properties to CSC (mass-based data).</p> <p><b>Emission factors:</b> WWF ilmastolaskuri, 2018</p>
<p><b>Scope 3: 1 Purchased goods and services</b></p>	<p>The figures are based on Hansel’s Hankintapulssi emission calculations (spend-based data). Hankintapulssi calculation is based on purchase invoice data and a calculation model developed by the Finnish Environment Institute. Measurement uncertainty is associated with emission factors relating to spend-based data, as they are based on average data and consequently do not reflect suppliers’ actual emissions. The monetary amounts used in the calculation are accurate.</p> <p>In 2025, supplier-specific data has been obtained from a few suppliers. In the 2024 recalculation, some of Hansel’s emissions data has been reallocated to other categories.</p>	<p><b>Scope 3: 6 Business travel</b></p> <p><b>Scope 3: 7 Employee commuting</b></p>	<p>Emissions related to business travel were calculated based on the reports from the travel agency and VR; travel claim calculations and data from Hankintapulssi. Business travel includes flights, train travel, travel by public transport, journeys taken by taxis and private cars, and hotel stays.</p> <p><b>Emission factors:</b> DEFRA, 2025 HSL, Sustainability report 2023</p> <p>Emissions from commuting were estimated based on a commuting survey conducted in 2024 (distance-based data). The estimate of total emissions is based on the average number of employees in 2025.</p> <p><b>Emission factors:</b> DEFRA, 2025 Gasum, 2025, <i>Biogas</i> HSL, Journey planner</p>
<p><b>Scope 3: 2 Capital goods</b></p>	<p>See 1 Purchased goods</p>	<p><b>Scope 3: 15 Investments</b></p>	<p>Report calculated using the PCAF method.</p>

# Biodiversity and ecosystems & Resource use and circular economy

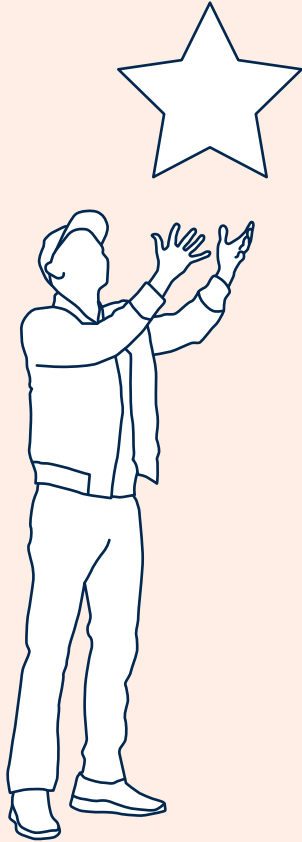
*Biodiversity and ecosystems*, as well as *resource use and circular economy*, have been evaluated material topics in CSC's materiality assessment. For both topics, a material opportunity has been identified in enabling research at the downstream end of CSC's value chain. No material impacts or risks were identified for these topics.

As part of its special assignment, CSC provides data management and computing services for research. Biodiversity research requires large data volumes, data processing, and the identification of complex interdependencies. Circular economy research offers extensive opportunities for data use and can, for example, be applied to material innovation. Growing demand for data and research related to both biodiversity and the circular economy is likely to drive demand for CSC's services over the long term.

In 2025, CSC coordinated the technical implementation of the [Biodiversity Digital Twin project](#), as well as the [Terra DT](#) and [Climate DT](#) projects supporting biodiversity research, all of which are part of the EU's Destination Earth initiative.

Read more about digital twins in our [Impact review](#).





# Social information

# Own workforce

## Material impacts, risks, opportunities and their management related to own workforce

Impacts	Risks and opportunities for CSC	Management
<b>Working conditions</b> <b>Employees' holistic well-being</b> <i>Sub-sub-topics: Work-life balance; Health and safety</i> The impact is maintained over the long term.	<b>Retaining and attracting critical competence</b> <i>Also sub-topic: Equal treatment and opportunities for all</i> The impact will increase over the long term.	<ul style="list-style-type: none"> <li>• CSC invests in the well-being of its personnel in many ways, including supervisor and personnel training and personnel benefits.</li> <li>• CSC offers opportunities for continuous learning and career development, strengthens its competence in the management of work ability and well-being at work, and develops its employer image.</li> </ul>
<b>Equal treatment and opportunities for all</b> <b>Positive impacts related to promoting diversity, equity and inclusion</b> <i>Sub-sub-topics: Diversity</i> The impact is maintained over the long term.	<b>Rich and diverse work community as a resource</b> <i>Sub-sub-topics: Diversity</i> The impact will increase over the long term.	<ul style="list-style-type: none"> <li>• CSC's Code of Ethics was updated in 2025.</li> <li>• CSC is a bilingual organisation. CSC's language policy guides how English and Finnish are used in internal communication.</li> <li>• The Equality and Non-Discrimination Plan and the Workplace Development Plan provide the framework and guidelines for developing the work community.</li> </ul>
<b>Comprehensible and transparent remuneration criteria</b> <i>Sub-sub-topics: Gender equality and equal pay for work of equal value</i> The impact is maintained over the long term.	<b>Creating a clear salary system supports employee engagement and motivation</b> The impact is maintained over the long term.	<ul style="list-style-type: none"> <li>• CSC will develop its remuneration and performance management models.</li> </ul>
	<b>Continuous learning and development</b> <i>Sub-sub-topics: Training and skills development</i> The impact is maintained or will increase over the long term.	<ul style="list-style-type: none"> <li>• Employees are provided with an individual development plan annually.</li> <li>• CSC offers opportunities for continuous learning and career development, for example through training and coaching programs.</li> </ul>

All material impacts, risks and opportunities related to own workforce are associated with CSC's own operations in the value chain.

## Impact, risk and opportunity management

CSC's employees play a critical role in the implementation of the company's business and strategic objectives. Ensuring a skilled, thriving, and motivated workforce is a prerequisite for CSC's operational capacity and competitiveness. If the availability or well-being of personnel deteriorates, this creates a significant risk to operational capability and the continuity of service provision.

CSC's attractiveness as an employer is based on, inter alia, its good reputation and ability to offer meaningful and challenging work. The company competes with the private sector for talent, and there is a risk that the required highly educated workforce will not be sufficiently available. Competition is expected to intensify further due to the growing data intensity in many sectors.

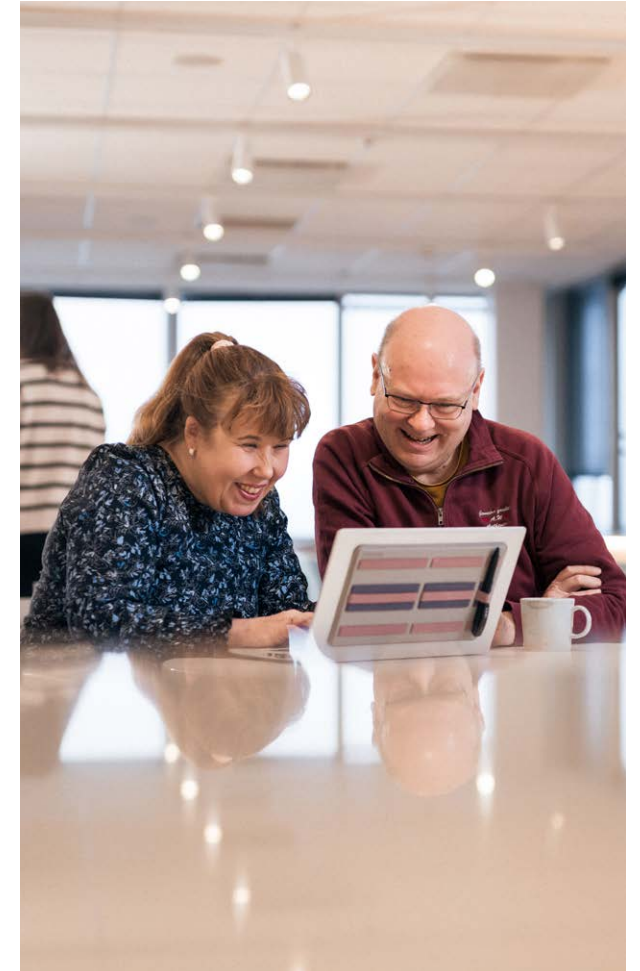
To secure critical expertise, CSC works systematically to strengthen its employer reputation both internally and externally. Cooperation with higher education institutions has been developed since 2023 to ensure competence through recruitment collaboration and shared opportunities for learning and skills development.

Personnel engagement and well-being are influenced by both positive and potentially negative factors. Meaningful work and experiences of success, support for work-life balance, a healthy and safe working environment, and opportunities for growth and development all promote holistic well-being. Deficiencies in these areas may, in turn, weaken job satisfaction, productivity, and career longevity.

Promoting diversity, equity and inclusion strengthen personnel well-being and increases the sense of belonging, improving job satisfaction and mental well-being. These factors have a direct impact on CSC's ability to attract and retain skilled employees. CSC already has a diverse work community, and inclusive leadership is key to harnessing the benefits of diversity and mitigating related risks.

Read more in the section "Promotion of equity, equality and diversity".

The fairness, comprehensibility, and transparency of remuneration have a significant impact on personnel motivation and commitment. According to CSC's personnel surveys, fair remuneration is one of CSC's strengths. On the other hand, perceived lack of transparency in the salary system and comparisons to salary levels in the wider labour market may weaken



employees' sense of fairness and engagement and complicate recruitment.

In 2025, CSC advanced its salary system development project, which aims to build a clear and transparent remuneration model that supports motivation and commitment and provides visibility into different career paths within CSC.

Investments in competence development and well-being strengthen productivity, extend careers and reduce recruitment costs in the long term. In an expert organization, high-quality leadership and supervisory work are decisive factors for employee experience and organizational performance.

In 2025, CSC invested in developing supervisory work by offering a comprehensive coaching leadership training program for supervisors and an influencer group. The influencer group consists of experts who guide and lead others, for example in project management roles.

Read more in the section "Competence development".

### **Policies related to own workforce**

CSC's policies related to its own workforce aim to promote the employees' holistic well-being,

competence development, diversity and equity as well as to prevent harassment and unethical activities.

### **Code of Ethics**

CSC's Code of Ethics was updated in 2025. During the renewal process, the Code of Ethics was made more concrete than before and expanded with more detailed guidance for different situations. The Code of Ethics defines CSC's principles for good business conduct and provides direction for ethical behavior both in everyday work and in business. It also sets out the framework for how we treat and respect customers, colleagues, and all representatives of our stakeholders.

CSC's values – Community, Expertise, Assurance, Integrity – form the foundation of all our work. The Code of Ethics guides the actions of CSC's management and personnel towards shared goals and helps us make good choices in daily work. It clarifies what we mean by transparent and responsible conduct in relation to customers, partners, society, and the environment.

As written in the Code of Ethics, CSC is committed to upholding internationally recognized human rights, including those cited in the UN Universal Declaration of Human Rights and the standards on labour rights

defined in International Labour Organization (ILO) conventions, and to respecting the ten principles of the UN Global Compact. We comply with laws and regulations, promote transparency and integrity, and act in accordance with the principles of sustainable development.

Every new employee starting at CSC completes Code of Ethics training as part of their induction. In addition, the Code of Ethics is reviewed annually as part of the CSC discussion with the supervisor. The Code of Ethics is published on CSC's intranet and [website](#).

### **Discrimination, harassment and inappropriate behavior**

CSC has zero tolerance for all discrimination, harassment, and inappropriate behavior.

CSC's guidelines on dealing with unfair treatment and harassment describes what constitutes behavior at the workplace that is against the law and good practice and provides clear procedures for handling such situations. The guideline emphasizes prevention, supervisors' duty to intervene, and employees' right to a safe and respectful work environment.

In accordance with the Code of Ethics, everyone is obligated to report any inappropriate behavior or

harassment they observe. A report can be made to one's supervisor, a personnel representative or the Employment Manager. CSC also has a Whistleblower channel, through which a report can be made anonymously if preferred. The channel is described in more detail in the section "Governance information". All bona fide suspicions of violations are investigated impartially and in confidence, and any necessary measures are taken based on the investigation. In addition, the annual personnel survey includes questions on discrimination, harassment, and inappropriate behavior.

#### **Promotion of equity, equality and diversity**

CSC employs international experts from almost 30 different countries. The organization's official working languages are Finnish and English, ensuring that all employees receive the necessary information and can participate fully in the work community.

CSC is committed to promoting equity, equality, diversity, and inclusion. The work is guided by a valid equality and non-discrimination plan based on current legislation.

The plan will be updated in 2026. In connection with the update, a broader diversity, equality, and inclusion section will be added, with clear targets

and development paths defined for achieving them. Concrete measures will be formulated as part of the update process.

To identify development areas and plan necessary actions, CSC regularly gathers information through CSC dialogue, personnel surveys, and personnel metrics. The 2025 personnel survey was expanded with new questions on equality, non-discrimination, and diversity to obtain more precise and up-to-date insights into development needs.

#### **Support for well-being at work**

The general objectives of CSC's occupational health activities and cooperation include supporting the personnel's work ability and functional capacity proactively, promoting well-being at work, and providing high-quality and extensive medical care with an emphasis on occupational health. The occupational health care action plan is updated annually in cooperation between the employer, occupational health care provider, occupational safety and health manager, and occupational safety and health representatives. The content of the plan is guided by occupational health risks identified in a workplace assessment, and the occupational health needs that are jointly identified by the company and occupational health care provider. On the basis of these, annual

targets are set for cooperation, measures are planned, and indicators are defined.

CSC has an early intervention model intended to support employees' work ability, aiming to support the well-being of the entire work community.

One of the priority areas in the development of supervisors' competence in recent years has been work ability management, and tailored coaching and training focusing on this theme have been organized for supervisors and managers.

The occupational safety and health program and plan are drawn up in cooperation within the Occupational Safety and Health Committee. The aim is comprehensive, long-term, and systematic promotion of health and safety in the workplace. The program defines roles, responsibilities, and operating methods in occupational safety and health.

As part of preparing for the move into new premises, CSC is preparing for WELL certification. WELL is a certification system that focuses on the well-being and health of users of a property or facility.

CSC's personnel benefits that support well-being and recreation include a package comprising sports,

culture, commuting and well-being benefits, as well as a lunch benefit and bicycle benefit. Comprehensive health insurance and remote work insurance complement the comprehensive occupational healthcare services provided for employees. CSC also organizes well-being and work community events intended for the entire personnel.

CSC's remote work and flexible working hours practices aim to support well-being at work, job satisfaction and work-life balance. CSC has remote work instructions and a remote work agreement that define the general principles and practices of remote work. Remote work is agreed with the supervisor, and the agreement is updated as necessary. The goal is that employees can select the most suitable mode of work within the requirements of their current tasks. Under flexible working hours, working hours can be allocated flexibly according to the work situation. In 2025, CSC also carried out a remote work abroad pilot. The pilot will be continued to gather additional experience through 2026.

### Competence development

Continuous renewal and competence development pave the way for securing CSC's success and operating conditions. CSC's competence development and renewal models are based on the

70–20–10 model for on-the-job learning and personal development, the purpose of which is to help identify and use diverse means of competence development and practices of sharing and developing competence.

In this model, 70% of learning and development takes place at work, for example while solving task-related challenges, 20% is based on interaction with colleagues and networks, and 10% takes place through different types of training.

Competence development is implemented on three levels:

- **Centrally** through HR, for example leadership and supervisory development program, content that supports well-being at work, and strategically important training.
- **At unit level**, where units organize training related to their domain expertise.
- **At individual level**, supervisors identify competence needs and draw up development plans together with personnel.

As part of the central offering, CSC provides a wide range of learning opportunities for the personnel: language training, online courses (e.g. interaction and self-leadership), online induction materials, and

internal and external trainings. In addition, guidance, training calendar, and learning content are available on the intranet and a video platform. The pension insurance company's learning environment also supports work ability and early-support competence.

Personnel can also take the initiative to organize company-wide competence and knowledge-sharing events, and they may participate in external training in line with their personal development plan.

CSC's development discussion model ensures that everyone has a personal development plan, and that short- and long-term career goals are discussed. A coaching leadership approach and regular one-on-one discussions support development in everyday work.

CSC invests in the induction of new employees. An individual induction plan is drawn up for each person, and a personal tutor is appointed. An online induction course that can be completed independently of time and place enables flexible onboarding.

Supervisors play a key role in identifying competence needs and implementing development. Aligning competence with role requirements supports well-being at work and the organization's objectives.

### **Processes for engaging with own workers and workers' representatives about impacts**

At CSC, the CSC Dialogue is held four times a year. The CSC Dialogue refers to the dialogue between the employer and employee as defined by the Act on Co-operation within Undertakings. The CSC dialogue helps to ensure that employees have an opportunity to influence decisions affecting them and that their views are heard. The objectives of the dialogue also include improving information flows in the workplace, promoting employee well-being, and improving the functioning of the work community. The employer's representatives in the CSC dialogue are the Managing Director, Vice Managing Director, HR Director, Employment Manager, and the Occupational Safety and Health Manager. The shop steward and occupational safety and health representatives participate in the dialogue as personnel representatives. The personnel representative in administration is also entitled to attend the meetings.

CSC conducts an annual personnel survey addressed to the entire personnel where they can express their views. This survey also includes indicators for monitoring the development of the company's corporate culture. The survey results are presented to the Board of Directors, and based on these results,

CSC prepares an annual development plan to promote a healthy and ethical corporate culture.

Four times a year, CSC organizes a personnel event where the personnel are informed of topical issues concerning them and where they can ask questions or express their views. CSC's personnel are kept informed in Finnish and English through different channels. These channels include the intranet, events for the personnel, email, and instant messaging.

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

CSC's personnel can raise their concerns and bring up their needs by contacting their supervisors, shop stewards, occupational safety and health representatives, Employment Manager, HR, by responding to the annual personnel survey, or by using CSC's Whistleblower channel. CSC encourages employees to bring up issues with their line manager. If an employee feels they would prefer to remain anonymous, CSC's Whistleblower channel offers an opportunity for this. CSC's Whistleblower channel is described in the section "Governance information".



# Metrics and targets

## Characteristics of the undertaking's employees

The data concerning employees are based on the situation at the end of the financial year on 31 December. The average number of employees during the year was 700, calculated as the average on the last day of each month. During the financial year, 30 permanent employment relationships ended, with a turnover of 4.6%.

CSC does not have non-employee workers as defined in CSRD and ESRS.

### Employee head count by gender

Gender	Number of employees
Male	440
Female	267
Other	2
Not reported	-
<b>Total employees</b>	<b>709</b>

The gender reported by employees with an employment contract.

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

	Female	Male	Total
Permanent	241	416	657
Temporary	28	24	52
Non-guaranteed hours	0	0	0
Full-time	243	414	657
Part-time	26	26	52

The gender reported by employees with an employment contract. As the number of individuals in the "Other" category is small, detailed information is not disclosed to protect privacy.

### Adequate wages

CSC always complies with at least the minimum wages specified in the collective agreement.

### Diversity metrics

#### Distribution of employees by age group

Age group	Number of employees	%
Under 30	97	14%
30 to 50	416	73%
Over 50	196	28%

### Gender distribution by role

	Female	Male
Specialists	37%	63%
Managers	45%	55%
Directors	41%	59%

### Social protection

CSC complies with a model of sick pay that is based on, but slightly exceeds, that specified in the collective agreement. After the period of paid sick leave under the collective agreement, everyone is entitled to sickness allowance paid as part of Finland's public social security scheme. Everyone is entitled to the general unemployment allowance paid as part of the Finnish public social security scheme. In Finland, all employers must take out statutory occupational accident insurance, which covers each employee for the treatment costs and loss of income caused by accidents at work. CSC complies with the collective agreement provisions concerning paid family leave for both the birthing and non-birthing parent. In addition, Finland's public social security scheme provides support for parents during family leaves. All employees are covered by the mandatory Finnish Employee Pensions Act (TyEL), the costs of which are shared by the employer and the employee.

100% of CSC's own workforce are entitled to family leaves.

100% of CSC employees are covered by collective agreements.

100% of members of CSC's own workforce are covered by an occupational health and safety management system based on legal requirements and/or recognized standards or guidelines.

### Training and competence development metrics

Development needs are discussed in the personal development discussions. A description of the model can be found in the section "Policies related to own workforce".

### Training and regular performance and career development reviews of employees

	Male	Female	Total
Percentage of employees that participated in regular performance and career development reviews	100%	100%	100%
Average hours of training completed per employee (hours per person)	14.25	21	16.5

The figures were calculated based on hours recorded in the working time monitoring system with the code for personnel training. This code is also used to record personnel information sessions that do not involve actual training. Personnel training may sometimes be registered as normal working hours, in which case those hours are not included in the training hour totals shown in the table. As the number of persons in the category "other" is low, no detailed information is provided to protect privacy.



# Workers in the value chain

*Workers in the value chain* have been assessed material in CSC’s materiality assessment. A reputation as an attractive partner increases the availability of expertise. External specialists form a flexible resource pool, enabling temporary increases in personnel and access to specialized skills. External specialists generally work as equal members of CSC’s service teams, which promotes their inclusion and engagement in team activities. Clear assignments and responsible supervision have a direct impact on well-being at work. External specialists are typically selected based on CVs and interviews, with selection criteria including qualifications, competence, and prior experience in similar tasks. Securing sufficient expertise is critical to CSC’s operations.

CSC primarily concludes consulting agreements through Hansel’s DPS framework agreements. Hansel conducts a sustainability analysis when selecting contract suppliers. For more details on sustainability in procurements, see the section “Governance information”.

## Material impacts, risks, opportunities and their management related to workers in the value chain

Impacts	Risks and opportunities for CSC	Management
<b>Working conditions; Equal treatment and opportunities for all</b>		
	<p><b>Reputation as an attractive partner increases available expertise</b></p> <p><i>Own operations</i></p> <p><i>Sub-sub-topics: Work-life balance; Gender equality and equal pay for work of equal value</i></p>	<ul style="list-style-type: none"> <li>• CSC has internal guidelines for the procurement of IT consulting</li> <li>• Code of Ethics and other operating principles are presented in the chapter “Own workforce”.</li> </ul>

Consultants are largely subject to the same work and management practices as CSC’s own personnel. Tasks must be clear, and supervision must be appropriate, predictable, and accessible.

CSC has internal guidelines for procuring IT consulting services, which include a description of guidance for consultants. The topics covered include induction, work guidance, communication, face-to-face meetings, and feedback. These guidelines are provided to all CSC managers and service owners who procure consultant services. In addition, regular

quality meetings are held with suppliers, where issues related to well-being at work, coping at work, and job satisfaction are also discussed.

CSC’s Code of Ethics defines ethical practices not only for its own personnel but also for consultants working as part of CSC teams. CSC’s Code of Ethics and other general operating principles are described in the section “Own Workforce”.

# Consumers and end-users

Consumers and end-users has been assessed as a material topic based on CSC’s materiality assessment.

The identified impacts relate to CSC’s role as a company entrusted with a special state assignment. In CSC’s Strategy 2025–2030, the theme Customer centricity is a cross-cutting element in all strategic objectives:

- We provide the most impact generating HPC and data ecosystem in the world
- We are a pacesetter for responsible adoption of artificial intelligence
- We bridge silos to enhance customer success

The first of these objectives relates to the end-users of CSC’s data management and computing services. This report describes the targets, principles, actions, and metrics associated with these users. In the coming years, the scope will be extended to cover end-users of other services provided for higher education institutions and public administration.

## Material impacts, risks, opportunities and their management related to consumers and end-users

Impacts	Risks and opportunities for CSC	Management
<b>Information-related impacts for consumers and/or end-users</b>		
<b>Teachers’ ability to plan and deliver high-quality teaching as well as improved cooperation between educational institutions</b> <i>Sub-sub-topic: Access to (quality) information</i>		<ul style="list-style-type: none"> <li>• Centralised and easily accessible teaching materials, digital learning solutions and support for cooperation</li> </ul>
<b>Supporting regional equality in education and lifelong learning</b> <i>Sub-sub-topic: Access to (quality) information</i> <i>Also sub-topic: Social inclusion of consumers and/or end-users</i>		<ul style="list-style-type: none"> <li>• CSC’s services provide students with location-independent access to materials and study opportunities, for example through hybrid and distance learning solutions.</li> </ul>
<b>Access to reliable research and data</b> <i>Sub-sub-topic: Access to (quality) information</i>		<ul style="list-style-type: none"> <li>• CSC’s services enable the sharing of research and data</li> </ul>
<b>High level of information security, reliability and resilience</b> <i>Sub-sub-topic: Privacy</i>		<ul style="list-style-type: none"> <li>• Providing secure, reliable and socially significant services.</li> <li>• Read more about information security and data protection at CSC in the chapter “Governance information”.</li> </ul>
	<b>Efficient data management and open data will bring savings and benefits to partners</b> <i>Sub-sub-topic: Access to (quality) information</i>	
<b>Social inclusion of consumers and/or end-users</b>		
<b>Positive impact on researchers’ and government organisation employees’ workflows</b> <i>Sub-sub-topic: Access to products and services</i>		<ul style="list-style-type: none"> <li>• The digital services, infrastructures and tools provided by CSC improve the efficiency of data management, analysis and use, speed up research processes and facilitate cooperation. This enables more streamlined work for researchers and government employees.</li> </ul>
<b>Digital preservation of cultural heritage content for the benefit of Finns</b> <i>Sub-sub-topic: Access to products and services</i>		<ul style="list-style-type: none"> <li>• We provide Digital Preservation Service for Cultural Heritage for the Ministry of Education and Culture.</li> </ul>
<b>Streamlining the application process of higher education institutions</b> <i>Sub-sub-topic: Access to products and services</i>		<ul style="list-style-type: none"> <li>• CSC provides Metropolia’s Vallu entrance examination system for universities’ digital entrance exams.</li> </ul>

All material impacts, risks and opportunities related to consumers and end-users are related to the downstream value chain.

CSC’s Board of Directors has set a 2025 performance target for the company requiring that investments in CSC’s data management and computing services generate significant societal value. To support this, a Social Return on Investment (SROI) study was conducted in 2025 in cooperation with Taloustutkimus, following a corresponding study carried out in 2024. Another target set for 2025 focuses on strengthening customer understanding to develop services that support the success of CSC’s customers. Agreements with customers include defined objectives related to service usability and utilization rates.

CSC’s website provides general terms of use for its services, specifying who may use the services, how, and for what purpose. The general terms are complemented by data processing agreements, service descriptions and any service-specific terms and usage policies. The Policy on Free Use defines who may use the services free of charge under the agreement between CSC and the Ministry of Education and Culture.

CSC complies with the Act on the Control of Exports of Dual-Use Goods, sanctions regulations, and CSC’s contractual obligations in all company operations. CSC’s internal export restriction policy provides guidance on practices and security processes arising from legislative and contractual obligations and describes how these are integrated into CSC’s internal processes. CSC facilitates a network of export-control liaison officers from research institutes and higher education institutions, with the aim of developing shared practices that support research security.

CSC receives regular feedback on its services for science through the Scientific Customer Panel. The panel consists of end-users and plays an important role in the development of CSC’s services. It is also responsible for the scientific evaluation of applications with exceptionally large needs for computing and data management resources. The panel convenes four times a year.

The Department for Higher Education and Science Policy (KTPO) of the Ministry of Education and Culture and CSC sign an annual agreement defining the services that CSC maintains, provides and develops

**Net Promoter Score of CSC’s services**

2020	2021	2022	2023	2024	2025
NPS 68	NPS 69	NPS 67	NPS 59	NPS 61	NPS 62
Avg. 9.0	Avg. 9.0	Avg. 8.9	Avg. 8.7	Avg. 8.8	Avg. 8.8

A question addressed to users of data management and computing services in CSC’s annual survey: “How likely would you recommend CSC’s services to your colleagues?” Scale 0 (not at all likely)–10 (very likely). The Net Promoter Score (NPS) is calculated by subtracting the share of detractors (score of 0 to 6) from the share of promoters (score of 9 to 10). The NPS index and the average responses are presented in the table. The number of respondents has varied from 232 to 576.

to meet the needs of research, education, culture and public administration. CSC reports openly on the fulfilment of the agreement and on the use of data communication, data management, and computing services.

CSC monitors the usability and utilization rates of its data management and computing services, the diversity and breadth of its user base, and user satisfaction. A user satisfaction survey is conducted annually to assess satisfaction with CSC’s services in general, as well as user experience and development needs related to individual services.



# Governance information

# Business conduct

## Material impacts, risks, opportunities and their management related to business conduct

Impacts	Risks and opportunities for CSC	Management
Corporate culture		
<p><b>Promoting and strengthening national and global research cooperation and its capabilities</b></p> <p><i>Own operations, downstream value chain</i></p>		<ul style="list-style-type: none"> <li>• International cooperation has a large role in CSC's current strategy and contributes to achieving its strategic objectives.</li> <li>• CSC offers its services to researchers in Finland and their international partners.</li> </ul>
	<p><b>Reputational risk in case of misconduct in the value chain</b></p> <p><i>Entire value chain</i></p>	<ul style="list-style-type: none"> <li>• CSC's procurements comply with CSC's own procurement guidelines and public procurement regulations.</li> <li>• We require our suppliers to commit to the Supplier Code of Conduct.</li> <li>• We are developing the human rights impact assessment of our value chains.</li> <li>• CSC has a Whistleblower channel for reporting suspected misconduct.</li> </ul>
	<p><b>Reputation based on reliability and transparency</b></p> <p><i>Downstream value chain</i></p>	<ul style="list-style-type: none"> <li>• CSC complies with good governance and the obligations set out in the ownership strategy and the Government Resolution on Ownership Policy (23 May 2024).</li> <li>• CSC is able to demonstrate the current state of information security and data protection in its operations, as well as risks, steering mechanisms, development plan and self-monitoring plan.</li> <li>• CSC's information security is assessed annually by an independent party (ISO27001 audit, customer audits).</li> <li>• CSC's AI policy describes how CSC utilizes AI.</li> <li>• CSC's Code of Ethics was updated in 2025.</li> <li>• CSC has a Whistleblower channel for reporting suspected misconduct.</li> </ul>
Political influence and lobbying		
	<p><b>Stakeholder cooperation and support for decision-making</b></p> <p><i>Downstream value chain</i></p>	<ul style="list-style-type: none"> <li>• Lobbying principles guide CSC's influencing work.</li> </ul>

# Impact, risk and opportunity management

## Business conduct policies

### Code of Ethics

The company's revised Code of Ethics (2025) is presented in more detail in the section "Own Workforce". CSC's internal business conduct policies serve as guidelines for all our operations.

### Whistleblower channel for reporting suspected misconduct

CSC has a Whistleblower system compliant with the European Union Directive (EU 2019/1937) and the Finnish Whistleblower Protection Act (1171/2022). Reports of suspected misconduct can be submitted confidentially and, if preferred, anonymously. By decision of the company, CSC also applies the principles of the Whistleblower channel in cases involving harassment, threats or abuse of power directed at an individual.

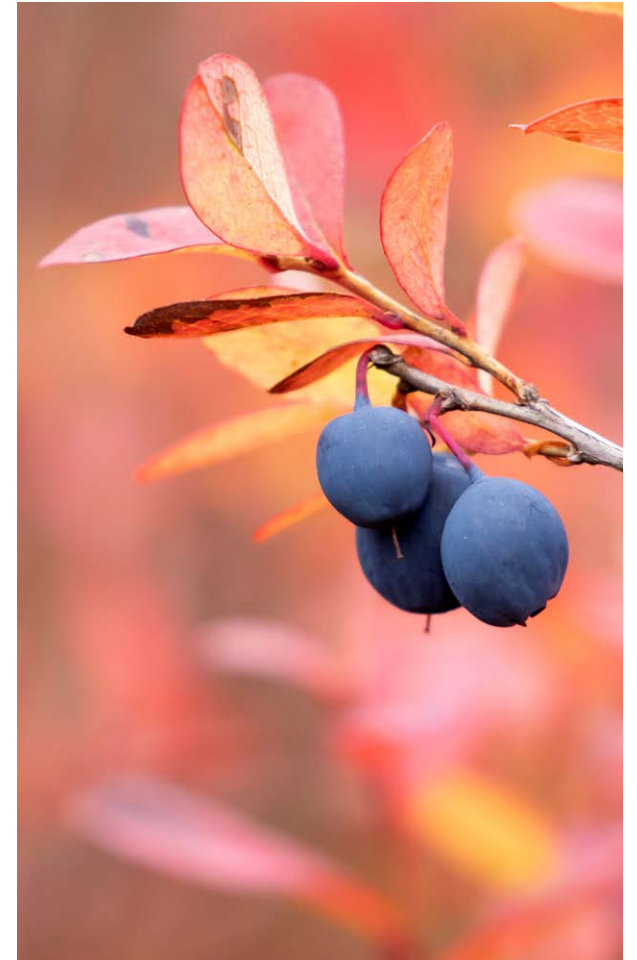
### Information security policy

CSC's security requirements, roles, and principles are defined in CSC's internal information security policy and the related guidelines, which are described on [CSC's website](#). The Security and Data Protection Steering Group oversees the development of security and confirms key decisions.

CSC's information security policy covers all operations of the organization, including customer and administrative systems, as well as internal and outsourced systems. The policy applies to existing and planned systems located at CSC premises, as well as systems maintained or owned by CSC elsewhere. The rules of the policy apply to all personnel, remote users, visiting researchers, outsourced services, and the systems used by partners.

The information security policy represents a shared, organization-wide view accepted and followed by CSC's management, staff and the entire organization. It defines the principles, objectives, responsibilities, and implementation of information security at CSC. Through information security policy, CSC aims to safeguard trust in the data and information systems under its responsibility. The information security policy is based on identifying and assessing risks relevant to operations and selecting appropriate security controls.

The arrangements required by the information security policy are governed by the information security management system. CSC's information security management system covers all CSC operations. Its implementation is continuously evaluated through internal and external audits, and further development is carried out in collaboration with



customers, authorities, and the research community. CSC implements the requirements of the ISO/IEC 27001:2022 standard within its information security management system and, where applicable, the national security auditing criteria for authorities (Katakri).

Information security awareness among personnel is maintained and strengthened through annual training. Information security training is part of the onboarding process for CSC's employees. Requirements of information security for customers and subcontractors are communicated through terms of use, guidelines, and security and confidentiality agreements.

In 2025, key actions included expanding information security certifications and transitioning to the updated ISO/IEC 27001:2022 standard, as well as renewing Katakri approval in early 2025 regarding security management and physical security in certain facilities. In addition, information security processes have been developed to comply with the implementation regulation of the NIS2 directive (2024/2690) and the national information security assessment criteria for public administrations (Julkri). As part of the development work, CSC has conducted an information security gap analysis and initiated preparations for a related development program.

### Data protection policy

Data protection is connected to the following impacts, risks, and opportunities identified in the materiality assessment: CSC's good employer reputation, high level of information security, reliability and resilience, as well as reputation based on reliability and transparency.

CSC has a data protection policy that defines the principles every employee must follow when processing personal data. The data protection policy and other related guidelines are based on the requirements of the EU General Data Protection Regulation (GDPR) and relevant national data protection legislation. CSC recognizes its role and responsibilities both as an independent data controller and as a processor of personal data on behalf of its customers. CSC implements data protection in accordance with the risk level of personal data processing and in alignment with customer instructions. For subcontractors, data protection requirements are enforced through contractual controls.

CSC personnel are required to complete mandatory data protection training, and data protection awareness is maintained through continuous additional training. Data protection obligations are integrated into operations by applying the principles of data protection by design and by default, meaning that data protection

requirements are embedded in service design and development processes from the very beginning.

In 2025, significant measures related to data protection have been implemented, including the renewal of the data protection policy, developing a process for built-in and default data protection, update of the data protection course, and training for supervisors.

### AI policy

In line with its strategy, CSC is a forerunner in the responsible deployment of artificial intelligence. In 2025, CSC published an updated AI policy that describes how CSC utilizes AI and supports its customers and users in adopting it.

The objective of the AI policy is to encourage and guide the safe use of AI within the organization and in the services provided to customers. The policy takes into account specific risks related to technologies and systems and provides guidance on how to ensure lawful and secure use. The policy applies to all use of AI at CSC. The policy is published on [CSC's website](#). There is also separate guidance for staff on the responsible use of AI tools, and training has been organized for all personnel.



### Risk management policy

Risk management policy of CSC lays the foundations for the risk management activities. It outlines risk management policy and principles, risk management framework, as well as roles and responsibilities related to how risk management at CSC is approached. The objective of the risk management policy is to improve evidence-based decision making, resilience, and undisturbed value delivery to customers. CSC's risk management aims to ensure reliable service delivery, informed decision-making, legal compliance, and fulfillment of customer contracts. The policy applies to all CSC operations.

In 2025, the risk management policy has been updated, and a risk management guideline has been created. The risk management guidelines provide a structured framework for implementing the organization's risk management policy. In addition, the first topic specific risk management guideline on security risks has been approved.

### Procurement practices

CSC makes significant procurements using public funds. The company competitively tenders all its procurements in accordance with applicable legislation. Procurements are carried out in compliance with the Act on Public Procurement

and Concession Contracts (1397/2016) and the Act on Public Procurement in the Fields of Defense and Security (1531/2011). Activities and decisions are guided by the principles of good governance: transparency, equal treatment, non-discrimination and purpose-bound use of public funds.

Procurements are primarily carried out by utilizing Hansel, the central purchasing body of the Finnish government. Hansel's role is to organize framework agreements and tendering procedures that support the principles of the Act on Public Procurement (1397/2016). Hansel promotes cost-effectiveness and quality in public procurement and ensures that procurement processes are transparent. Sustainability considerations are also integrated into Hansel's tendering processes.

In addition, in its competitive tendering processes CSC uses the Criterion Bank for sustainable public procurement, Kriteeripankki, maintained and developed by Motiva.

CSC has a supplier Code of Conduct, which sets minimum sustainability requirements for suppliers and supply chains. These requirements cover social, environmental, and ethical principles. The Code of Conduct is attached to CSC's procurement contracts

to ensure that responsibility is upheld throughout the supply chain. The Code of Conduct is also being established as a permanent annex to CSC's contract templates, thus strengthening its role as an integral part of procurement processes.

CSC maintains dialogue with its suppliers and provides training to CSC's virtual procurement organization, including training on sustainability themes and criteria in procurement.

In 2025, CSC initiated work to develop supplier management guidelines. In addition, a human rights impact assessment was started, identifying sector-specific risks and mitigation measures.

### **Political influence and lobbying activities**

CSC provides impartial expert information to decision-makers on matters related to CSC's areas of expertise.

In 2025, CSC participated in parliamentary hearings, national consultation rounds and EU-level consultations concerning initiatives relevant to CSC, such as the development of high-performance computing and application of new technologies including artificial intelligence, data management, data

centers and digital capabilities. CSC's key objectives included ensuring the continuity of high-performance computing and data management infrastructures as part of the national RDI framework, strengthening expertise through shared research infrastructures, and promoting human-centric AI and continuous learning. CSC was invited to participate in the Prime Minister's roundtable discussions on artificial intelligence and the data economy and took part in preparing the data economy roadmap. These legislative initiatives were regarded as strategically significant for CSC. In addition, CSC raised awareness of legislative obstacles hindering RDI activities in the health sector; addressing these barriers would support the better societal use of research infrastructures and health data resources.

CSC does not directly or indirectly support any political activity, political parties or political groups.

### **Lobbying principles**

CSC is committed to the principles of good advocacy practice as defined in the Finnish Transparency Register. The objective of CSC's advocacy work is to support the operating conditions of Finnish education and research.

To advance this objective, CSC provides its expertise to support national and European decision-making related to digitalization, research and innovation policy.

CSC's activities include meetings with decision-makers and other stakeholders, participation in consultation rounds and hearings, and contributing to public debate through CSC's communication channels. CSC also analyses the economic and societal impact of its operations and communicates these insights to its stakeholders.

CSC aims to highlight the digitalization needs of RDI activities, public administration, businesses and education to ensure that these needs are taken into account when regulation and societal structures are developed. CSC follows developments in digitalization, research and innovation policy and participates in related discussions from the perspective of digital infrastructures.

CSC engages in open stakeholder cooperation, with the goal of building shared understanding, through dialogue and exchange of expertise, of the societal impact of digital RDI tools and the needs associated with them.

CSC's societal stakeholder cooperation is open and transparent. CSC reports to the Finnish Transparency Register (Business ID 0920632-0) and the EU Transparency Register (registration number 098297335667-27).



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