

# Sustainability report 2025

- 25** General disclosures
- 62** Environmental information
- 88** Social information
- 104** Governance information

This report is a voluntary publication and an unofficial translation. The statutory Report of the Board of Directors and Financial Statements have been published in Finnish in ESEF-compliant XHTML format.



# General disclosures

## BP-1 General basis for preparation of sustainability report

### Basic information

GRK is a Finnish infrastructure construction group operating in Finland, Sweden and Estonia. Its core competences include the implementation of diverse infrastructure construction projects, extensive track expertise and project management of large and small projects. GRK offers all necessary construction services for civil engineering, road, environmental and industrial construction. In the rail construction business, GRK also provides design and maintenance services besides construction. GRK's civil engineering and road construction business also includes paving. GRK also offers environmental technology services.

### Basis for preparation

GRK's sustainability report is a Group sustainability report, and it has been prepared in accordance with the EU Corporate Sustainability Reporting Directive (CSRD) and Chapter 7 of the Finnish Accounting Act, using the European Sustainability Reporting Standards (ESRS) required by the Directive. This is GRK's first report, as the company was listed on the Helsinki Stock Exchange on 2 April 2025.

In addition to the parent company GRK Infra Plc, GRK Group includes the following companies: GRK Suomi Oy in Finland, GRK Eesti AS, A-Kaabel OÜ and Novus Initium Investments OÜ in Estonia and GRK Sverige AB in Sweden. The parent company GRK Infra Plc is responsible for the Group's administration and financing.

The sustainability report is prepared at Group level and covers all country companies. The scope of consolidation is the same as in the consolidated financial statements. The reporting period for the annual sustainability report is the same as for financial reporting, i.e. the calendar year.

### Mergers and acquisitions

During the reporting period, GRK made two acquisitions. With the acquisition of ASM Kiviainespalvelu Oy, GRK strengthened its position in circular economy services. The transaction was completed on 1 July 2025, and following the transaction, ASM Kiviainespalvelu's personnel (3 people) and customer accounts operate as part of GRK's circular economy services. ASM Kiviainespalvelu has been taken into account in the sustainability report data as of 1 July 2025. The integration of operations took place in 2025, and ASM Kiviainespalvelu merged into GRK Finland Oy on 31 December 2025.

In addition, GRK strengthened its expertise in infrastructure sector electrical services in Estonia by acquiring A-Kaabel OÜ, which focuses on the design, construction and installation of various medium and low-voltage systems, data centres and telecommunications systems. The transaction also included the affiliate Novus Initium Investments OÜ, which owned equipment used by A-Kaabel OÜ. The transaction took place on 7 July 2025 and has been approved by the Estonian competition authorities. The transaction was completed on 1 September 2025. With the acquisition, GRK gained 38 persons of additional resources.

The integration of operations took place in 2025, but A-Kaabel OÜ will continue as a separate company owned by GRK. Novus Initium Investments OÜ's assets were transferred to A-Kaabel OÜ. A-Kaabel is included in the sustainability report disclosures from 1 September 2025.

The sustainability report reviews GRK's value chain from suppliers of materials, raw materials and services and other partners to customers and the stakeholders that we take into account during work. GRK's value chain is described in more detail in section SBM-1.

GRK has not omitted disclosures related to intellectual property, know-how, innovation results, ongoing development or matters under negotiation.

## BP-2 Disclosures in relation to specific circumstances

### Exemptions and limitations

Some of the Scope 3 supply chain emissions disclosed in the report include estimates. The estimates are presented in more detail in section E1-6 of the report. Scope 3 accounting was mainly based on secondary emission factors, as supplier-specific primary data was available only to a limited extent. In cases where quantitative information was not available or could not be consistently derived from the provided data, a cost-based methodology was applied in accordance with the GHG Protocol. The emission factors are derived from both the national emission database and industry-specific international data sources that meet the requirements for timeliness, representativeness and comparability. The assumptions included in the estimates are based on typical material flows and production processes. In addition, the reported material quantities have been partly estimated using average cost-based estimates derived from procurement data. The estimation methods are described in more detail in section E5-5 of the report.

The metrics presented in the report have not been validated by third parties other than the assurance provider of the sustainability report. References to the consolidated financial statements have been made for the following information:

- Average number of employees
- Carbon intensity based on consolidated revenue

GRK applies the following transitional provisions in the first year of preparing the company's sustainability report in 2025:

- ESRS 1, 10.3 Transitional provision related to section 7.1 Presenting comparative information

- ESRS 2 SBM-1 paragraph 40(b) (breakdown of total revenue by significant ESRS sector) and 40(c) list of additional significant ESRS sectors
- ESRS 2 SBM-3 paragraph 48(e) anticipated financial effects
- ESRS E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
- ESRS E2-6 Anticipated financial effects from pollution-related impacts, risks and opportunities
- ESRS E4 Biodiversity and ecosystems
- ESRS E5-6 Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities
- ESRS S1 S1-11 Social protection
- ESRS S1 S1-13 Training and skills development
- ESRS S1 S1-14 Data points on cases of work-related ill-health and on number of days lost to injuries, accidents, fatalities and work-related ill-health
- ESRS S2: Workers in the value chain

**E4:** GRK uses the transitional provision in accordance with ESRS 1 Amendment C amended by the European Commission Delegated Regulation 2025/1416 (Omnibus “Quick fix” Regulation) for the reporting of data on biodiversity and ecosystems.

Based on the double materiality analysis, GRK’s impacts, risks and opportunities related to biodiversity and ecosystems were identified to be particularly related to land-use changes (degradation of soil and deforestation) and biodiversity loss caused indirectly by climate change (significant biodiversity loss related to GHG emissions and climate change). Soil treatment during construction, deforestation and the climate impacts of the value chain can weaken the state of ecosystems and affect species. These impacts particularly concern project-specific land-use solutions and the use of materials and climate emissions as part of the construction life cycle.

GRK’s policies for managing these impacts are based on the environmental policy, which steers operations towards a lower impact on nature, and the Corporate Sustainability Requirements for Suppliers, which require suppliers and subcontractors to follow the same sustainability principles as GRK requires of its

own operations. The Corporate Sustainability Requirements for Suppliers guide principles related to environmental responsibility, material use and compliance with laws, among other things. GRK’s environmental policy is described in more detail in section E1-2 of the report and the Corporate Sustainability Requirements for Suppliers in section G1-2.

The management of impacts is supported by Nature and Climate Roadmap supplier cooperation and the development of transparency in the value chain. During 2025, no actions were taken separately, and their results were not evaluated. The actual measurement or monitoring of ecosystem impacts is not yet possible, as the E4 standard metrics are not in use. No time-bound targets have been set.

**S2:** GRK uses the transitional provision in accordance with ESRS 1 Amendment C amended by the European Commission Delegated Regulation 2025/1416 (Omnibus “Quick fix” Regulation) for the reporting of data on value chain workers. GRK will continue to work on developing value chain information.

Based on the double materiality analysis, GRK’s impacts, risks and opportunities related to value chain workers were identified as being related to working conditions and equal treatment and equal opportunities. In particular, employees of GRK’s subcontractors are seen to be subject to negative health and safety impacts typical of the construction environment, to which also GRK’s own personnel are subject. These impacts include the negative impact of the physical stress of work tasks and varying conditions on the health of employees, as well as the risk of work-related accidents and fatalities caused by the conditions. GRK’s policies for managing these impacts have been recorded as part of the company’s Corporate Sustainability Requirements for Suppliers. GRK’s suppliers and subcontractors are required to commit to the same corporate sustainability requirements that we are committed to in our own operations. The document contains GRK’s policies and requirements for compliance with legislation and ethical principles, compliance with sanctions and integrity, information security, occupational health and safety and the environment. Corporate Sustainability Requirements for Suppliers are described in more detail in section G1-2 of the report.

In addition, the aim is to manage the impacts through, for example, supplier background checks, site induction, regular communication and audits. In

accordance with the values included in GRK’s strategy, we take responsibility for each other, our work and the future and strive for regular cooperation with our partners. The results of the measures have not been evaluated separately.

Supplier audits are carried out by GRK’s HSEQ (Health, Safety, Environment, Quality) team. The goal for 2025 was to carry out six audits, and the goal was achieved. The identification of potential misconduct is also supported by a confidential whistleblowing channel that is available to all stakeholders. The number of reports received through the whistleblowing channel serves as a metric for GRK in assessing the achievement of equal treatment.

GRK’s goal is to create a safe working environment for everyone, and this is monitored using several metrics. GRK’s occupational health and safety goals related to the frequency of accidents and lost working days are described in section S1-5 of the report and apply not only to the company’s own workforce but also to workers in the value chain. Other time-bound targets related to value chain workers have not yet been set.

## GOV-1 and GOV-2 The role, information provided to and sustainability matters addressed by the administrative, management and supervisory bodies

### Annual General Meeting

GRK’s highest decision-making body is the general meeting of shareholders in accordance with the Limited Liability Companies Act. The tasks and functions of the Annual General Meeting are defined in the Limited Liability Companies Act and the company’s Articles of Association. The Board of Directors convenes the Annual General Meeting annually within six (6) months of the end of the previous financial year. The Annual General Meeting elects a sustainability reporting assurance provider, a sustainability audit firm. The principal sustainability reporting assurance provider appointed by this firm must be an Authorised Sustainability Auditor (ASA).

### Board of Directors

The Board of Directors is responsible for GRK’s governance and the arrangement of its operations. The Board is also responsible for GRK’s accounting and

financial management. The Board handles all matters that fall within its area of responsibility pursuant to Finnish law, the Articles of Association, the Corporate Governance Code, the rules of Nasdaq Helsinki and other rules and regulations concerning listed companies in Finland. The Board decides on significant matters pertaining to GRK Group. For example, it decides on GRK's strategy, significant investments, mergers and acquisitions, the management system and proposal concerning profits.

The CEO participates in the Board of Directors' meetings and brings up matters that have a significant impact on the operations of GRK Group for decision-making. GRK's Board and Audit Committee receive regular information on GRK's material sustainability impacts, risks and opportunities. All material and non-material topics identified through the double materiality analysis have been reviewed by the Board during the sustainability reporting process. The Board has discussed the material impacts, risks and opportunities of GRK's operations in its meetings, including in relation to the strategy.

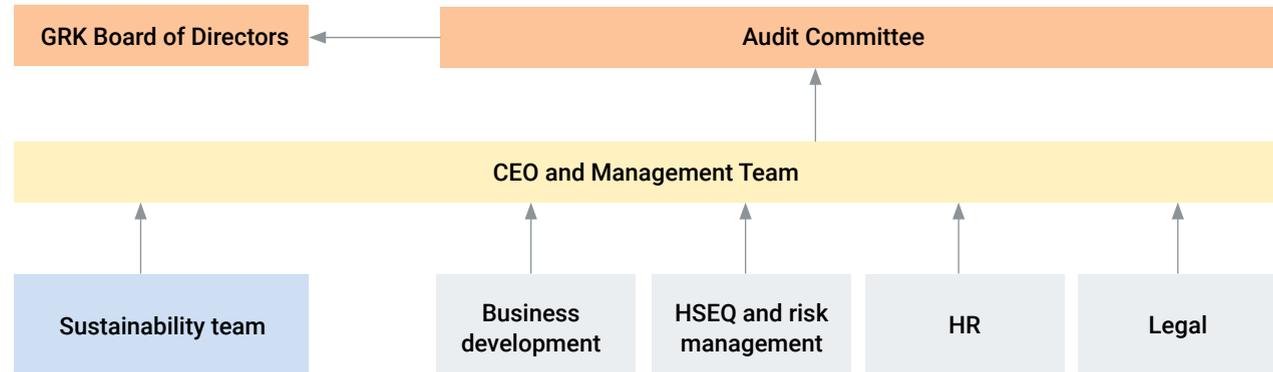
The Board approves the Group's strategic sustainability targets and monitors their implementation. The presentation and implementation of the sustainability targets is the responsibility of the Group Management Team, which reports regularly to the Board. The Group's Chief Business Development Officer reports to the Management Team on the progress of sustainability work.

The Board of Directors actively participates in GRK's strategic guidance of sustainability in environmental, social and corporate governance (ESG) issues. The Board decides on significant matters concerning the company, including GRK's strategy and the targets and metrics set for its monitoring. GRK's sustainability targets have been incorporated into GRK's strategic decision-making and day-to-day operations.

### Board committees

The Board of Directors may establish standing committees to assist the Board in preparing matters for which it is responsible. In 2025, GRK's Board had three permanent committees: the Audit Committee, the Personnel and Remuneration Committee and the Tender Stage and Project Committee. The committees report regularly to the Board.

## Sustainability management at GRK



GRK's responsibility function is the responsibility of the Chief Business Development Officer, and the sustainability team consists of various experts from different functions

The task of the Audit Committee is to assist the Board of Directors in fulfilling its supervisory responsibilities regarding GRK's financial and sustainability reporting process and GRK's statutory auditing and assurance of sustainability reporting. The Audit Committee assists the Board in supervising matters related to the financial statements, the assurance of sustainability reporting, internal control, internal audit, the risk management system and related party transactions, and makes proposals to the Board on these matters.

The duties of the Audit Committee also include preparing the election of the auditor and sustainability reporting assurance provider, assessing the independence of the auditor and sustainability reporting assurance provider and, in particular, the ancillary services provided by them, as well as other duties assigned by the Board to the Committee. In addition to its other duties, the Audit Committee monitors and assesses the effectiveness of the internal control and risk management system as well as the work of the auditor and the sustainability

reporting assurance provider. The Chief Business Development Officer manages the impacts, risks and opportunities identified as material to GRK together with the sustainability team. The Chief Business Development Officer brings these impacts, risks and opportunities to the attention of the Audit Committee, which monitors them as part of the sustainability reporting process.

The Board of Directors is responsible for all of GRK's impacts, risks and opportunities. The Audit Committee, on the other hand, monitors the sustainability reporting process, i.e. the Committee is not responsible for the identified impacts, risks and opportunities for GRK per se. GRK's Management Team's job descriptions do not include impact, risk or opportunity-level responsibilities, but the responsibilities are defined on the basis of policies. Each member of the Management Team is responsible for implementing the policies and actions related to impacts, risks and opportunities in their respective area of responsibility.

### Board independence and diversity

According to GRK's Articles of Association, the Board of Directors consists of 5-7 ordinary members. The members of the Board are elected by the Annual General Meeting. The term of office of the members of the Board ends at the close of the Annual General Meeting following the election. The Shareholders' Nomination Board prepares a proposal for the composition of the Board of Directors to be adopted by the Annual General Meeting.

In 2025, the following seven members served on GRK's Board of Directors: Kari Kauniskangas, Keijo Haavikko, Antonia Eneh, Minna Heinonen, Jukka Nikkanen, Tarja Pääkkönen and Esa Lager. Kari Kauniskangas acted as Chair of the Board, and Keijo Haavikko was the Vice Chair of the Board. In addition, Johanna Korhonen's term as a member of the Board ended on 2 April 2025. On the same day, the terms of office of Antonia Eneh and Minna Heinonen, who were elected as new members of the Board of Directors at the GRK's Annual General Meeting on 5 March 2025, began.

The number of executive Board members was 0 and the number non-executive members was 7. 86% of the Board members were independent of the company and significant shareholders. The number of employees of the company is 0 and the number of other Board members is 7.

GRK's goal is for the composition of the Board of Directors to reflect diversity. Thereby, the diverse expertise, experience and views of the members of the Board enable wide-ranging discussion to support decision-making and support and challenge GRK's operational management. The Board must have an equal representation of women and men.

In order to achieve the diversity target, GRK has drawn up written diversity principles for the Board, which the Shareholders' Nomination Board takes into account when proposing the composition and members of the Board. The implementation of diversity is reported in GRK's annual Corporate Governance Statement.

In 2025, the Board of Directors consisted of 3 (43%) women and 4 (57%) men. The gender distribution of the Board of Directors as an average ratio of female and male members was 0.75.

### Board competence

The members of the Board of GRK have a diverse educational background and extensive experience in management positions in different industries. The Board's competence matrix is presented in the table below. In addition, sustainability training was organised for the Board during autumn 2025 to strengthen their expertise in sustainability-related matters. Two of the Board members also has experience in preparing a double materiality analysis and a sustainability report for other listed companies.

The Board of Directors' competence matrix presents information on the expertise of members of GRK's Board, including experience of the company's industry, management, international operations and responsibility. The matrix is based on the own assessments of the members of the Board. Expertise was considered to be fulfilled if there was more than three years of experience in the theme in question.

#### The Board of Directors' competence matrix

	Construction sector expertise	Group financial management	Corporate and sustainability risk management	Development and implementation of group strategy	Acquisitions	People management	CEO experience	International experience	Identification and setting of sustainability metrics
Kari Kauniskangas	x	x	x	x	x	x	x	x	x
Keijo Haavikko	x	x	x	x	x	x	x	x	
Antonia Eneh		x	x	x		x		x	
Minna Heinonen	x	x	x	x	x	x	x	x	x
Jukka Nikkanen	x	x	x	x	x	x	x	x	x
Tarja Pääkkönen	x	x	x	x	x	x		x	x
Esa Lager	x	x	x	x	x	x		x	x

GRK has identified material risks and opportunities for business operations in the following areas: climate change (E1), pollution (E2), resource use and circular economy (E5), own workforce (S1), workers in the value chain (S2), governance (G1) and entity-specific disclosures. GRK's Board's extensive expertise and areas of expertise support GRK's ability to manage the aforementioned risks and leverage the related opportunities.

Expertise in the management of construction, financial and sustainability risks makes it possible to prepare for climate change, environmental risks and economic changes and to develop sustainable solutions, among other things. Strategic and international experience helps to leverage new business opportunities and respond to the geopolitical changes and megatrends identified by GRK. In addition, expertise in acquisitions is seen as important for the implementation of profitable growth and geographical expansion in accordance with GRK's strategy. People management and CEO experience support the management of impacts related to working conditions, equality and good governance.

### The Group's CEO

The CEO manages, controls and supervises the day-to-day business operations of the company in accordance with the instructions and orders of the Board and the company's policies and other guidelines. The CEO is responsible for arranging the company's day-to-day administration and ensuring that the company's accounting complies with applicable legislation and that the management of the company's assets is reliably arranged. The CEO prepares matters to be decided on by the Board, develops the Group in accordance with the goals agreed with the Board and ensures the appropriate implementation of the Board's decisions. The CEO brings matters that are of significant importance to the company or the Group as a whole and that cannot be considered to be part of the day-to-day management of the companies to the Board to decide on.

The Board appoints and dismisses the CEO and decides on the terms and conditions of their employment and financial benefits.

The CEO must provide the Board and its members with the information necessary for the performance of the Board's duties. The CEO brings up matters that are of significant importance to GRK or the Group as a whole and that cannot be considered to be part of GRK's day-to-day administration.

The CEO prepares matters to be decided on by the Board, develops the Group in accordance with the goals agreed with the Board and ensures the appropriate implementation of the Board's decisions. The CEO is not a member of the Board of Directors but participates in the Board meetings and exercises the power to speak there.

Juha Toimela served as the CEO of GRK Infra Plc until 30 September 2025 and Mika Mäenpää from 1 October 2025.

### Group Management Team

The Group Management Team assists the CEO in the planning of operations, operational management and decision-making. The Group Management Team also prepares matters to be reviewed by GRK's Board and assists the CEO in implementing the Board's decisions and GRK's strategy. The Group Management Team reviews matters relating to business operations and the development and supervision of operations. The Group Management Team convenes regularly according to a pre-agreed schedule, and minutes are kept of each meeting.

The Group Management Team comprises the CEO and members appointed by the Board at the proposal of the CEO. Each member of the Group Management Team has their own area of responsibility. The Group's Chief Business Development Officer is responsible for the Group's sustainability reporting.

The Management Team actively promotes the achievement of GRK's strategic sustainability goals related to the environment, social responsibility and governance (ESG). The Management Team's sustainability competence will be supplemented with training during 2026. The Management Team monitors the set sustainability metrics annually and their achievement quarterly. If necessary, the Management Team prepares a detailed action plan to achieve the set targets.

The table on the next page presents information on the expertise of GRK's Management Team members, including experience in the company's industry, strategy implementation, management and responsibility. The matrix is based on the Management Team members' own assessments. Expertise was considered to be fulfilled if there was more than three years of experience in the theme in question.

The Chair of the Management Team was Juha Toimela, CEO of the Group, until 30 September 2025 and Mika Mäenpää from 1 October 2025. The other members of the Management Team were Johanna Korhonen, HR Director; Anneliina Kupiainen, Business Director, Environmental technology; Johanna Metsä-Tokila, Chief Legal Officer; Jaakko Mäkelä, Business Director, Civil Engineering and Paving; Mikko Nyhä, Business Director, Rail Business and VP of GRK Suomi Oy; Markku Puolanne, CFO; Timo Pinomäki, Chief Risk Officer; Riina Rantsi, Chief Business Development Officer; Carl Andersson, CEO, GRK Sverige AB (from 1 October 2025); Tiit Roben, CEO, GRK Eesti AS.

At the end of 2025, 36% of the members of the Management Team were women and 64% were men. All 11 members of the Management Team participated in executive management.

### GRK's Board has approved the following policies:

- Principles of Fair Operations
- HR policy
- Human rights policy
- Safety, quality and environmental policy
- Risk management policy
- Anti-corruption policy

In addition, GRK's Management Team has confirmed the Group's Corporate Sustainability Requirements for Suppliers.

## Management Team's competence matrix

	Construction sector expertise	Corporate and sustainability risk management	Group strategy development and strategy implementation	Acquisitions	People management	Processes and reporting systems development and governance	Sustainability-perspectives identification
Mika Mäenpää	x	x	x		x	x	
Carl Andersson	x	x	x		x	x	
Tiit Roben	x	x	x	x	x	x	
Johanna Korhonen	x	x	x	x	x	x	x
Anneliina Kupiainen	x	x	x		x	x	
Johanna Metsä-Tokila	x	x	x	x	x		x
Jaakko Mäkelä	x	x	x		x	x	
Mikko Nyhä	x	x	x	x	x	x	
Markku Puolanne	x	x	x	x	x	x	
Timo Pinomäki	x	x	x	x	x	x	x
Riina Rantsi	x	x	x		x	x	x

## Age distribution of top management (CEO, Management Team, Board of Directors)

Age distribution	2025
under 30 years old	1
30–50 years old	6
over 50 years old	11
<b>Total</b>	<b>18</b>

## Basis of preparation for the metric

The age distribution of top management takes into account the members of the Management Team and the Board as well as the CEO as of 31 December 2025.

### GOV-3 Integration of sustainability-related performance in incentive schemes

GRK Infra Plc has in place a remuneration policy approved by the Annual General Meeting in 2025, describing the principles and decision-making procedure for the remuneration of the members of the Board and the CEO. The policy has been drawn up in accordance with the Limited Liability Companies Act, Securities Market Act and Decree of the Ministry of Finance on the remuneration policy and remuneration report of a share issuer and the recommendations of the Finnish Corporate Governance Code 2025.

Sustainability-related objectives affect remuneration indirectly, as GRK's projects are subject to customers' ESG criteria (safety, quality, and environment), compliance with which is a prerequisite for project success and financial performance. This is reflected in the performance-based incentives of the CEO that are linked to financial metrics.

Additionally, the variable remuneration of the CEO includes a sustainability-related element through occupational safety. The short-term incentive scheme includes a health and safety gate, allowing the Board of Directors to moderate or reduce the bonus if serious occupational safety deviations occur. The safety deduction is 10 % for each serious occupational accident.

The Board of Directors is responsible for approving the structure, performance measures, and terms of the remuneration systems, and it is supported in this task by the Personnel and Remuneration Committee. The Committee ensures transparency, compliance with laws and regulations, and strategic consistency of remuneration and that remuneration supports responsible leadership and the Company's long-term objectives.

The members of the Board of Directors, as well as other administrative, management or supervisory bodies, do not have incentives linked to variable remuneration, and their remuneration is not tied to sustainability.

### GOV-4 Statement on due diligence

GRK does not have a separate due diligence process. Internal audits related to sustainability are carried out as necessary in accordance with GRK's governance principles.

Key elements of the due diligence process	Location in the Group sustainability report
Embedding due diligence in governance, strategy and business model	GOV-1, GOV-2, GOV-3, SBM-1, SBM-3,
Engaging with affected stakeholders in all key steps of the due diligence	GOV-2, SBM-2, IRO-1, S1-2, S1-3, G1-2,
Identifying and assessing adverse impacts	SBM-3, IRO-1, E1-2, E2-1, E5-1, S1-1, S1-3, G1-1, G1-2
Taking actions to address those adverse impacts	E1-3, E2-2, E5-2, S1-3, S1-4, G1-1, G1-2, G1-3, G1-5
Tracking the effectiveness of these efforts and communicating	E1-5, E1-6, E5-4, E5-5, S1-5, S1-6, S1-8, S1-9, S1-14, S1-16, S1-17, G1-4, G1-6

### GOV-5 Risk management and internal controls over sustainability reporting

The identification of sustainability-related risks is part of GRK's overall risk management. GRK does not have a separate sustainability risk management function. Instead, such risks are addressed as part of the existing risk management processes.

GRK's Board is responsible for monitoring and evaluating the company's sustainability reporting. The Audit Committee of the Board assists the Board in fulfilling its supervisory responsibilities. The Audit Committee, comprised of Board members, monitors the sustainability reporting process, the assurance of sustainability reporting and the effectiveness of internal control processes that ensure the reliability of sustainability reporting. The Management Team is responsible for presenting the sustainability reporting to the Board.

Sustainability risk management is part of GRK's risk management system. Risk management takes place at project, process and personnel level, and risk assessments are monitored and updated as necessary. Management is supported

by internal and external audits and management reviews. The HSEQ team is responsible for the implementation of risk management and the compilation and analysis of data. The reliability of reporting is ensured as part of GRK Group's management system. The risks identified in connection with the reporting requirements have been incorporated into the annual risk assessment carried out for the Group Management Team.

The most important identified risks related to sustainability reporting are the accuracy of the information and, due to the scope of the information to be reported, the risk that not all relevant information can be reported comprehensively and reliably. Collecting the information presented in the sustainability report requires manual steps, which increases the possibility of errors. The risk related to information accuracy is managed with clear responsibilities in the collection, inspection and reporting of information. A person has been designated as responsible for each piece of information to be reported and, where possible, reconciliations are carried out in order to ensure the accuracy of the information. The risk arising from the extent of the reported information is managed by utilising the possibility of phase-in, which can reduce the number of disclosures in the first reporting year.

### SBM-1 Strategy, business model and value chain

#### Strategy

The strategic intent is that during 2025–2028, GRK will grow profitably and in 2028 the company will be a forerunner in sustainable construction and have the most competitive team.

In late 2024, GRK's Board confirmed the company's updated strategy for 2025–2028. Megatrends and the impacts of changes in the geopolitical and economic outlook on our operations were reviewed in connection with the strategy update. The needs for safeguarding the security of supply and critical infrastructure are expected to guide infrastructure investments. Due to this, success in projects related to critical infrastructure and defence was selected as one of the strategic priorities. At the same time, projects related to the green transition of industry and the construction of energy infrastructure are expected to accelerate infrastructure

construction. Energy efficiency, circular economy, low emissions and stopping biodiversity loss are at the heart of sustainable infrastructure construction. The goal was thus set to strengthen GRK's share in green transition projects and expand into new areas of infrastructure construction. Geographical expansion will be pursued in Sweden in particular, as projects have so far been focused on northern Sweden. The megatrends and geopolitical changes that guided the strategy work as well as GRK's strategic intent, choices and means are presented in the figure on page 33.

The availability of a skilled and motivated workforce is a challenge in the construction industry. GRK's strength is its values-based entrepreneurial culture. The aim is for GRK to attract, grow and retain the best multi-skilled experts. Fostering cooperation and coherence between different operating countries and business areas is also one of GRK's strategic priorities. Corporate responsibility is an important part of GRK's strategy, in which being a forerunner in sustainable construction is emphasised as the strategic intent. Sustainable construction means that we design, implement and maintain infrastructure while taking into account the environment, safety and ethical principles.

GRK's strategic sustainability goals cover all product and service categories, geographical operating areas and GRK's customer categories. GRK's strategy is linked to the goal of being a forerunner in sustainable infrastructure construction. The strategy covers all ESG dimensions: in terms of environmental responsibility, GRK has adopted a nature and climate roadmap with which it aims to achieve zero emissions by 2050 and a 50% emission reduction by 2040. The availability of skilled workforce and the well-being of personnel are at the heart of social responsibility: GRK invests in building a competitive team and in work safety.

With regard to governance, sustainability has been integrated into the Group's management and risk management. The Board monitors the achievement of the strategic sustainability targets and reporting and is responsible for assessing the material impacts, risks and opportunities identified in the double materiality analysis. Thus, GRK ensures that sustainability is not a separate area, but an essential part of the company's strategy and operations.

GRK has assessed the relationship of current products and services as well as significant markets and customer categories to the Group's sustainability targets by combining the results of the double materiality analysis, business-specific emissions and material data and the responsibility requirements of key customer groups. The assessment has been carried out as part of the Group's strategy process and the risk management embedded in the operating system.

Based on the assessment, GRK's services, particularly the road, railway and environmental construction, support the Group's climate and circular economy targets. The increasing requirements of public contractors for emission and material efficiency are strengthening this direction and guide the design of our projects and the choice of materials.

Based on the assessment, the emission-intensive areas of construction, such as the use of asphalt and bitumen products, are key development targets. In addition, the fuel dependency of the machinery is identified as a key change need from the point of view of the objectives. The machinery emission reduction measures have been included in GRK's climate roadmap. GRK's strategic direction emphasises climate change mitigation and the circular economy. GRK's goal is to achieve net zero carbon emissions from its own operations by 2035. The goal guides choices to reduce the fleet's dependency on fossil fuels, reduce

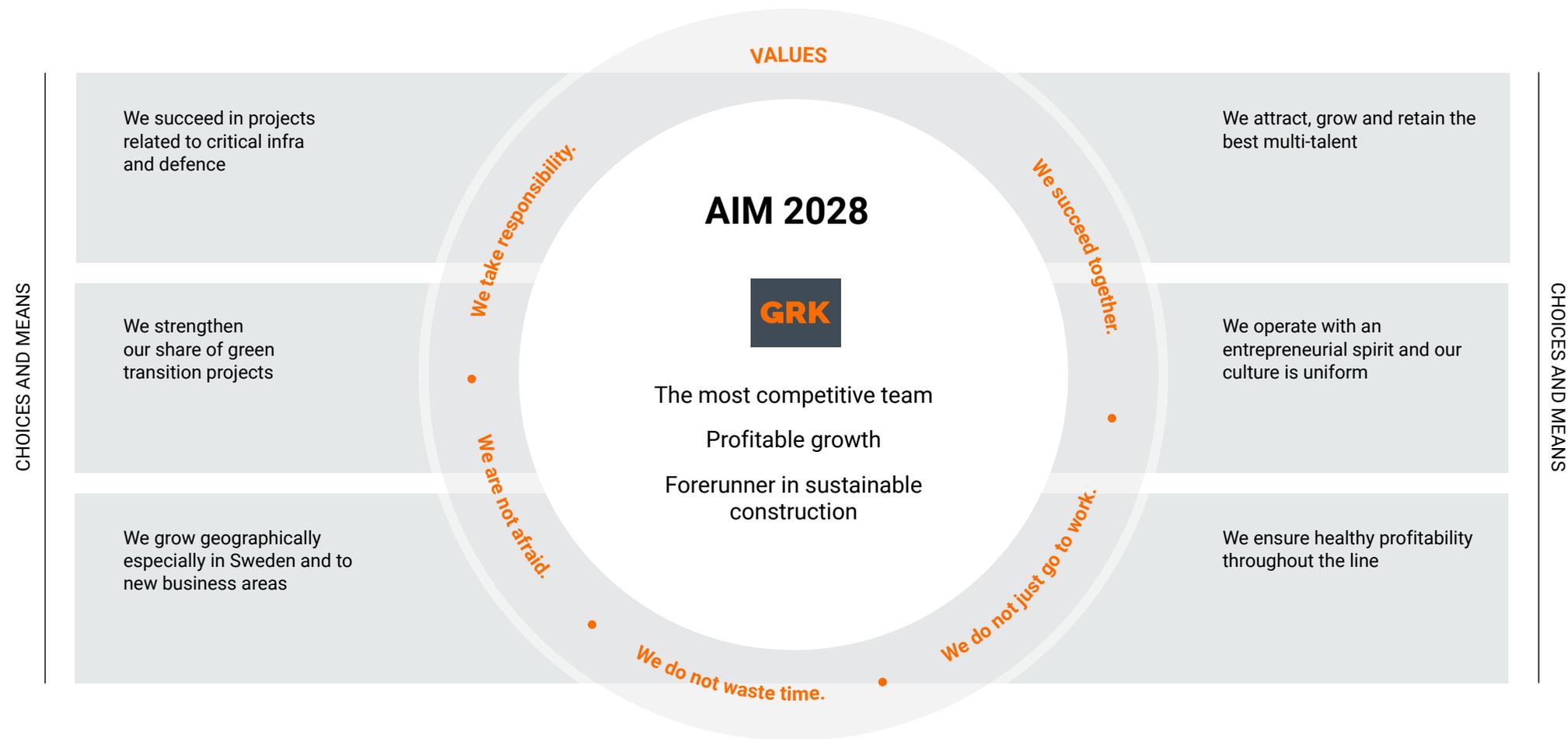
the emission intensity of asphalt production and increase the use of secondary materials. The use of secondary materials has a direct impact on the emissions and cost efficiency of projects.

People are at the core of the strategy. GRK has identified the availability of skilled workforce as a significant risk for the entire industry, which directly affects the feasibility of the strategy. Therefore, GRK invests in recruitment capability, the employer image and the continuous development of competence.

Safety and the continuous improvement of safety at all sites is a strategic cornerstone. The project-based and seasonal operating environment creates challenges for the uniform implementation of training and competence, but this is addressed by developing training processes and induction models.

GRK's business is based on ethical principles, which are compiled in the Principles of Fair Operations. These include equality, non-discrimination, fair competition, transparency of the supply chain and prevention of bribery and corruption. These issues are strategically important, especially because GRK operates in critical infrastructure projects in which reliability and ethics are a prerequisite for participation.

The significant strengthening of information security and digital risk management, which will be implemented by building and implementing an information security management system in accordance with the ISO 27001 standard, is embedded in GRK's strategy. The project ensures the integrity and operational reliability of data as well as the readiness for the management of digitised sites and reporting obligations. This is also a critical part of ensuring the quality of data related to CSRD reporting.



**MEGATRENDS AND GEOPOLITICAL CHANGES**

Geopolitics, security of supply, and the need to safeguard critical infrastructure are guiding states' infrastructure investments.	Industrial sustainable transition projects and energy infrastructure construction are accelerating infrastructure development.	The availability of skilled and motivated labor is a challenge in the construction industry.	Energy efficiency, circular economy, low emissions, and halting biodiversity loss are at the core of sustainable infrastructure construction.	Digitalization and information and hybrid risks impose requirements on the development of working methods and the operations of organizations.
--	--	--	---	--

*GRK's strategic intent and choices as well as the megatrends and geopolitical changes guiding the strategy work*

## Business model

GRK's business consists of civil engineering and road construction as well as paving, rail construction and environmental technology. GRK designs, repairs and maintains streets, roads, tracks and bridges. We operate in Finland, Sweden and Estonia. GRK's core competencies include the implementation of diverse infrastructure construction projects, project management of large and small projects, and extensive track expertise. GRK offers all rail construction services from design to construction and maintenance. Our customers include the state administration, municipalities, cities and the private sector. GRK works on several projects in cooperation with other companies in the infrastructure sector.

## Value chain

GRK's value chain covers those operators and processes on which GRK has significant influence or dependency in conducting business operations. The value chain consists of three parts: Upstream (suppliers of materials and services, subcontractors, transports), own operations (in Finland, Sweden and Estonia) and downstream (customers and the stakeholders we take into account during the work, such as companies operating in the vicinity of construction sites and residents as well as zoning and other corresponding administrative authorities).

**Own operations.** GRK operates in three countries: Finland, Sweden and Estonia. GRK's core competencies include the implementation of diverse infrastructure construction projects, project management of large and small projects, and extensive track expertise.

GRK offers all necessary construction services for civil engineering, road, environmental and industrial construction. In the rail construction business, GRK also provides design and maintenance services besides construction. GRK's civil engineering and road construction business also includes paving. GRK also offers environmental technology services. GRK's strategy includes the goal of expanding geographically and into new business areas. In 2025, GRK launched the Power business, which mainly focuses on the construction of electricity transmission networks (110/400 kV) and substations as well as the construction of renewable

energy. The business is related to GRK's strategic objectives, although its significance is still minor in the year of establishment.

At the end of 2025, GRK had 1,222 employees. The disaggregation of GRK employees by country is presented in section S1-6.

**Upstream.** GRK's upstream value chain consists of functions and operators that influence our operations before the actual construction work. GRK's key upstream functions and operators include raw material producers, material manufacturers, transport services and subcontractors. Reviewing the upstream value chain helps us to identify the environmental impacts of raw material production and transportation, as well as the working conditions of subcontractors, among other things. We cooperate with upstream operators in tendering processes, when concluding subcontracting and supplier agreements, when we request proof of the quality of raw materials, materials and services, and when we conduct supplier audits.

**Downstream.** GRK's downstream value chain covers those for whom we carry out projects, i.e. customers, as well as the stakeholders that we take into account during the work, such as companies and residents close to construction sites. Key downstream functions include dialogue with customers, participation in events organised by them, careful review of tender request materials and site meetings with clients. These help us to better understand our customers' goals and to continuously develop our services.

Sections E1, E2, E5, S1, G1 and entity-specific disclosures of the report describe in more detail the actors in the value chains taken into account in the reporting period 2025.

## SBM-2 Interests and views of stakeholders

The purpose of GRK's stakeholder engagement is to enable mutual exchange of information with all stakeholders. At the meetings of the GRK Group Management Team, each member reports on the most important events in their area of responsibility, so that all members of the Management Team are informed of the views of the stakeholders. Based on this discussion, the CEO passes on the most

significant observations to the Board. The views expressed through stakeholder engagement have an impact on GRK's business model and strategy.

In 2025, no changes were made to the business model or strategy based on stakeholder engagement. The following table presents the channels of each stakeholder engagement, the expectations of the stakeholder and how GRK meets these expectations.

Stakeholder	Engagement channels	Stakeholder expectations	Meeting expectations/Impact on operations, business model and strategy
<b>Personnel</b>	Supervisory work, orientation, training, internal communication, personnel information sessions, personnel survey, occupational safety committee activities, whistleblowing channel	Safe working environment, competitive pay, competence development, equality, well-being at work	Group induction and induction guide, systematic and proactive development of safety culture, safety observation and construction site safety rounds, zero accident target, training plan, DEI training, compliance with the Principles of Fair Operation, comprehensive employee wellbeing benefits and occupational health services, early support model
<b>Workers in the value chain</b>	Orientation, safety observation, site meetings, site safety rounds, audits, whistleblowing channel	Safe working conditions, equality at construction sites with GRK's own employees	Corporate Sustainability Requirements for Suppliers, inspection of foreign workers' work permits, safety observation and site safety rounds, audits, whistleblowing channel, accident frequency monitoring
<b>Trainees and students</b>	Visits to educational institutions, cooperation with educational institutions, orientation, trainee satisfaction, eNPS survey of trainees	Internships, compensation for internships, employment after studies	Employing more than 100 trainees annually, paying trainees a competitive pay, aiming for as many trainees as possible to return to GRK the following year and work for GRK after their studies
<b>Suppliers and subcontractors</b>	Contract negotiations, audits, assessments, reporting	Clear requirements, fair cooperation, punctuality of payments	Corporate Sustainability Requirements for Suppliers, contractor liability audits, audits, compliance with payment terms
<b>Customers</b>	Customer feedback surveys, project-specific communication, reporting	Quality, adherence to schedules, safety, correct cost level, sustainability	Careful tender calculation, ISO-certified operating system, customer satisfaction targets, on-time project completion
<b>Partners</b>	Open and active interaction at every stage of the project	Professional work, successful cooperation and interaction, safe working conditions	We work closely together both inside the company and with our partners.
<b>End-users</b>	Contacts, websites, resident events, customer feedback through customers	Safe and functional infrastructure, construction that takes local residents into account, accessibility	Compliance with the operating system, planning of work in line with life cycle thinking, analysis and consideration of customer feedback
<b>Owners and financiers</b>	Investor and analyst meetings, results announcements, press releases and investor pages, reporting	Good annual return, management of governance and social risks, compliance with legislation, safe and healthy working environment	Increase in shareholder value, strategic sustainability targets, profitable growth, compliance with the Principles of Fair Operations
<b>Authorities and decision makers</b>	Permit processes, EIA procedures, reporting, audits	Safety, compliance with legislation, transparency, environmental responsibility	Low accident frequency, certifications and permits, compliance with environmental permits and avoidance of environmental damage, Principles of Fair Operations, compliance with CSRD requirements

*Interests and views of stakeholders*

### SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

The double materiality process is described in section IRO-1. GRK's material sustainability topics and subtopics that emerged on the basis of the double materiality analysis have been compiled together with impacts and measures. The material impacts, risks and opportunities of sustainability topics are described in more detail by topic in sections E1, E2, E5, S1, G1 and Entity-specific disclosures.

## Environmental information

### E1 Climate change

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Own operations			Time horizon
					Upstream	Downstream	Time horizon	
Climate change mitigation		Negative impact (potential & actual)	Our operations generate a significant amount of GHG emissions. The GHG emissions generated by GRK's own operations and the operations of value chains cause global warming, which impairs the living conditions of people and nature.	We have prepared the Nature and Climate Roadmap that guides our work towards lower-emission operating methods. We continuously train and develop our operations and have set ourselves the goal of being a forerunner in sustainable construction. We also require our suppliers to follow the same procedures.	x	x	x	short-term, medium-term and long-term
		Negative impact (potential & actual)	Our operations reduce the amount of carbon sinks.	At our construction sites, we make sure that we save trees whenever possible.	x	x	x	short-term, medium-term and long-term
		Positive impact (actual)	We produce low-emission sustainable construction solutions for our customers. Low-emission sustainable construction solutions refer to alternatives to virgin materials or low-emission working methods.	We continue to develop sustainable solutions and actively offer our customers low-emission construction solutions.	x	x	x	short-term, medium-term and long-term
		Risk	The low-carbon transition and its requirements will result in investments and more reporting.	We ensure that our equipment and production facilities are up to date and assess the profitability of new operations in changing circumstances before making investment decisions.	x	x	x	medium-term
		Opportunity	The low-carbon transition offers new construction opportunities through hydrogen networks, electricity networks and, for example, the construction of production plants for the green transition.	We continuously monitor the development of the market and actively develop and offer our expertise to new green transition projects.			x	medium-term

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Adaptation to climate change		Risk	Physical hazards related to climate change, such as increasing floods, storms and fires, drought and heat, can disrupt our suppliers' operations and logistics, causing disruptions to our projects. This will increase the costs of our operations.	We develop our preparedness for the physical hazards of climate change through proactive measures in procurement and our own operations. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x		medium-term
		Risk	The physical hazards of climate change can make it difficult to work safely at infrastructure construction sites and increase the costs of carrying out the work.	We continuously assess the impacts of climate change on the implementation of our work and update our work instructions regularly. If necessary, we will introduce new working methods and tools. We also require our suppliers to follow the same procedures.	x	x	x	medium-term
		Opportunity	Sustainable procurement solutions and decentralised procurement can reduce project delays and additional costs. GRK's sustainable procurement refers to a process that takes into account the environmental and climate impacts of procurement, social impacts and human rights in the supply chain, as well as good governance and ethical operations in supplier relationships, and ensures that the procurements support GRK's sustainability goals.	We will replace material deliveries that are dependent on climate change and sensitive to supply disruptions with sustainable solutions and by decentralising procurement.	x	x		medium-term
Energy		Negative impact (potential & actual)	Our operations consume a significant amount of energy.	We are committed to reducing our energy consumption in accordance with a separate action plan. We also require our suppliers to follow the same procedures.	x	x		short-term and medium-term
		Negative impact (potential & actual)	We use energy-intensive materials in construction.	We are actively looking for new alternative materials and use secondary and recycled materials in our projects whenever feasible.	x	x	x	short-term, medium-term and long-term
		Risk	We are dependent on fossil fuels and raw materials. Their availability problems and price increases pose a risk to our operations.	We are actively looking for new alternative fuels and materials, and we use secondary and recycled materials in our projects whenever feasible.	x	x		medium-term
		Opportunity	Success in energy efficiency and the adoption of fossil-free fuel and material alternatives will reduce our costs in the long term.	We have prepared the Nature and Climate Roadmap that guides our work towards lower-emission operating methods in the short, medium and long term. The roadmap is an annually updated tool that helps us in our aim about ensuring our success in the adoption of alternative fuels and materials.	x	x		long-term

## E2 Pollution of air, water and soil

Sub-topic	Sub-sub-topic	Type	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Pollution of air		Negative impact (potential)	Potential pollution of the air by dust or harmful substances generated by operations.	We see to the selection of appropriate tools and operating methods and anticipate potential dusty work phases by surveying them and drawing up a plan for managing the impacts. We also require the procedures from our subcontractors and suppliers.	x	x	x	medium-term and long-term
Pollution of soil and water		Negative impact (potential)	Potential pollution of water and soil as a result of operations.	We see to the selection of appropriate tools and operating methods and anticipate machine breakdowns with regular inspections and draw up a plan for managing the impacts. GRK's sites are equipped with the necessary control equipment. We also require the procedures from our subcontractors and suppliers.	x	x	x	medium-term and long-term
		Risk	The transition to a zero-polluting economy may require significant investments in the implementation of water treatment on construction sites or the processing of materials to reduce emissions.	We develop our preparedness for the transition to a non-polluting economy through proactive measures in procurement and our own operations. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x	x	medium-term
Substances of concern and substances of very high concern		Negative impact (actual)	Use of substances of concern and substances of very high concern in production.	We are looking for harmless substitute alternatives to previously used substances. We also require the procedures from our subcontractors and suppliers.	x	x	x	medium-term
		Negative impact (actual)	Exposure to substances of concern and substances of very high concern in production.	We ensure the appropriate use and storage of chemicals and materials, as well as protection against them.	x	x	x	medium-term
		Risk	Disposal of substances of concern and substances of very high concern may incur costs when the substances are replaced with less harmful alternatives.	We develop our preparedness for the transition to a non-polluting economy through proactive measures in procurement and our own operations. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x	x	medium-term

## E4 Biodiversity and ecosystems

Sub-topic	Sub-sub-topic	Type	Description	Impacts on the business model, strategy, value chain and decision-making and related actions	Upstream	Own operations	Downstream	Time horizon
Direct impact drivers of biodiversity loss	Climate change	Negative impact (actual)	The GHG emissions generated in our own operations and value chain accelerate climate change, which reduces biodiversity through changes in habitats and the decline in species, for example.	We have prepared the Nature and Climate Roadmap that guides us towards lower-emission solutions, including circular materials and energy-efficient working methods. In the value chain, impacts are managed through Corporate Sustainability Requirements for Suppliers and by developing suppliers' emissions and material monitoring.	x	x	x	long-term
	Land-use change, fresh water use and sea-use change	Negative impact (potential & actual)	Construction-time land-use change can locally deteriorate the quality of the soil and reduce the amount of trees, which impairs the functioning of ecosystems.	We have prepared a Nature and Climate Roadmap that guides us in taking biodiversity into account in land use. We also require our suppliers to follow the same procedures.	x	x	x	short-term and medium-term

## E5 Resource use and circular economy

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on the business model, strategy, value chain and decision-making and related actions	Upstream	Own operations	Downstream	Time horizon
Resource inflows		Negative impact (potential & actual)	Significant use of natural resources reduces their sufficiency and environmental status.	We use as little energy as possible and replace raw materials and materials with renewable and recycled alternatives where possible. Our circular economy business has expanded and supports the circular economy of materials generated in construction, enabling their intermediate storage and processing. We bring our expertise to the attention of customers and work in cooperation with our suppliers to develop common requirements.	x	x	x	short-term and medium-term
		Risk	Dependency on fossil raw materials and materials creates a cost risk as the market becomes lower-carbon.	We seek and test opportunities to increase the use of renewable and biofuels. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x		medium-term
		Risk	Circular economy requirements increase efficiency and reporting requirements and require the reuse of materials. Compliance can increase investment costs.	We develop our preparedness for circular economy requirements through proactive measures in procurement and our own operations. We support the promotion of circular economy requirements with our extensive network of sites, which makes it possible to increase the efficiency of reuse of materials. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x	x	medium-term
		Opportunity	Developing resource efficiency and integrating circular economy thinking into operations can reduce material costs and increase the efficiency of work.	We use our circular economy expertise and expand successful operating methods in the further development of operations. We develop site-specific material procurement and monitoring. We develop industry practices by offering our circular economy services to all of our customers and partners. Opportunity to improve our success in tenders with circular economy requirements.	x	x		long-term
Waste		Negative impact (potential & actual)	Our operations generate a significant amount of waste.	We are developing site-specific sorting and recycling rates. We strive to minimise material waste. We set common goals with our suppliers.	x	x		short-term, medium-term and long-term
		Risk	Circular economy requirements increase efficiency and reporting requirements and require the reuse of materials. Compliance can increase investment costs.	We develop our preparedness for circular economy requirements through proactive measures in procurement and our own operations. We support the promotion of circular economy requirements with our extensive network of sites, which makes it possible to increase the efficiency of reuse of materials. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x	x	medium-term

## Social information

### S1 Own workforce

\*Identified as a human rights impact

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Working conditions	Employment security*	Positive impact (actual)	Stable employment and long-term employment relationships support the well-being of the personnel. Providing jobs in the current economic situation and in several cities is a socially responsible achievement.	In addition to sharing knowledge and skills and training our existing personnel, GRK has been able to recruit new personnel on a continuous basis. In accordance with the HR policy, GRK aims to tie permanent and long-term employment relationships. In addition, GRK invests in the well-being of its personnel to engage employees and maintains a strong employer brand to recruit new professionals.		x		short-term and medium-term
		Negative impact (actual)	Seasonal fluctuations typical of infrastructure construction and changes in market conditions can cause uncertainty in employment.	Personnel planning, competence development and internal mobility support employment despite seasonal fluctuations. GRK invests in the commitment of personnel and the continuous development of competence in order to promote employment security.		x		short-term and medium-term
	Health and safety*	Negative impact (actual)	In the construction industry, the physical stress of work tasks and varying and challenging working conditions can impair the health of employees. The work often involves the use of heavy machinery and equipment, which increases noise exposure, as well as the handling of various materials that may involve exposure to harmful substances. In addition, high temperatures and unergonomic working positions during work phases can increase the strain on the musculoskeletal system.	GRK's operations are guided by an operating system certified in accordance with the ISO 45001 standard, including the occupational health and safety policy and safety plans, among others. The health of employees is taken into account from the start of the employment relationship, and every new GRK employee undergoes a pre-employment examination during the trial period. The employee examination includes a physical fitness test by an occupational physiotherapist and an examination by an occupational health physician. In addition, regular age-related examinations are carried out on GRK's personnel. Health examinations are organised every 1–3 years, particularly in the rail construction business. An exposure register is maintained for persons working with hazardous substances and they must undergo exposure controls annually. In order to minimise the impacts on safety, GRK uses several measures, such as internal audits, safety observations, weekly site meeting and safety briefing practices as well as orientation and training. All near misses and potential accidents are reported and investigated to promote a safe working environment.		x		short-term, medium-term and long-term
					Negative impact (actual)	The demanding work tasks in the construction sector and the operating environment in the infrastructure sector increase the risk of work-related accidents and fatal accidents.		x
		Risk	Violation of workplace health and safety regulations poses a risk to compliance and operating expenses. Additional operating expenses may arise in the form of audits or legal expenses, for example.			x		short-term and medium-term

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Equal treatment and equal opportunities for all	Diversity	Negative impact (actual)	The construction industry is characterised by a low proportion of women among the company's employees and senior management.	The dominance of men typical of the industry is also reflected in GRK's personnel figures. At GRK, diversity and equality efforts and equal pay are managed through the human rights and HR policies. These policies are supported by, for example, diversity training and training for recruiting managers, documented recruitment practices and the whistleblowing channel. In addition, the Group's gender distribution is monitored annually at both Group and country company level.		x		short-term and medium-term
	Gender equality, equal pay for equal work	Negative impact (actual)	The low proportion of women among the company's employees and senior management, which is typical of the construction industry, may weaken gender equality and the possibility of equal pay.			x		short-term and medium-term
		Risk	Lack of gender equality or wage discrimination may pose a risk related to compliance with laws and regulations. This can increase operating expenses in the form of audits, reporting periods, salary comparisons or legal costs, for instance.	At GRK, pay is always determined according to the valid local collective agreement, the job grade and the employee's experience. Other factors, such as gender, do not affect recruitment or pay, and diversity and equality are always taken into account starting from recruitment. GRK's HR carries out salary comparisons and regularly reviews the employment situation of employees with varying working hours. These measures aim to ensure that everyone is paid equally and that the form of the employment contract always corresponds to the actual workload.		x		short-term and medium-term
	Training and skills development	Negative impact (actual)	The seasonality and project-based work typical of the industry pose a challenge for the uniform organisation of training and development discussions for all employees.	GRK's personnel work in a wide range of tasks and have different educational backgrounds. These have a direct impact on the regularity of the employee's training. In addition, development discussions are unfortunately not yet as common among construction employees as among white-collar employees, or the discussions have not been reported. GRK ensures the competence of its own personnel through the training plan, orientation, online training and mentoring. In addition, active cooperation with educational institutions and the provision of internships contribute to ensuring the continuity of competence.		x		short-term and medium-term
		Positive impact (actual)	Continuous and systematic development of personnel competence ensures the sufficient competence required for the implementation of the strategy, provides competitive advantage and motivates personnel for career development.			x		short-term and medium-term
	Measures against violence and harassment at the workplace	Negative impact (potential)	Discrimination and harassment at the workplace can impair the employees' well-being, feeling of safety and working atmosphere. Such situations can lead to reduced work ability, sickness absences and personnel turnover.	GRK has zero tolerance for inappropriate treatment, discrimination and harassment. Employees are trained in ethical practices through, for example, training in the principles of fair operations and diversity. Each employee must complete the Principles of Fair Operations training annually. Supervisors and management are required to intervene in inappropriate treatment if it occurs. In addition, the occupational safety committee and shop stewards offer low-threshold support. In the annual personnel survey, one can provide anonymous feedback on any harassment. The confidential whistleblowing channel, on the other hand, allows anonymous reporting of grievances for all stakeholders.		x		short-term and medium-term

## S2 Workers in the value chain

\*Identified as a human rights impact

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Working conditions	Employment security*	Positive impact (actual)	Providing employment and livelihood to a large number of people in the value chain in addition to our own employees.	A significant part of GRK's work is carried out by contractor partners. These partners share our entrepreneurial corporate culture and we see them as an essential part of our work community. Over the years, GRK has offered employment to numerous entrepreneurs through our projects. Long-term partnerships with subcontractors have been a key part of GRK's success, bringing continuity and expertise to projects and providing subcontractors with stable employment.	x		x	short-term and medium-term
		Negative impact (actual)	Due to the seasonal fluctuation typical of the construction industry, employment relationships in some positions may be fixed-term.	GRK uses external labour in special situations and to balance seasonal peaks. In our operations, we always take into account the framework conditions set by collective agreements. Subcontractors may be used for short-term work requiring special skills. If the need for certain kinds of specialists becomes continuous, the aim is, where possible, to enter into a permanent full-time employment relationship with the persons.	x		x	short-term
	Working hours*	Negative impact (actual)	In the construction industry, there is a risk that employees' overtime is managed in ways that may be unfair or unsafe. This is due to the nature of construction work, which often involves tight schedules and pressure to complete projects on time. The employer's influence on this is limited.	Risks related to the subcontracting chain in the construction industry, such as unfair working time practices, inadequate pay or an impaired work-life balance, may have a negative impact on GRK's business model, strategy and value chain. GRK manages these risks throughout the value chain through the Corporate Sustainability Requirements that apply to its own operations as well as suppliers and subcontractors. GRK's Corporate Sustainability Requirements for Supplier require all of our operators to comply with labour law, collective agreements and safety regulations. Compliance with the requirements is monitored through audits, reporting and whistleblowing channels. In addition, the aim of resource allocation and personnel planning is to manage negative impacts related to working hours and work-life balance. Seasonality also has a positive effect on those working at the site, as employees can take longer leaves after a busy period.	x		x	short-term and medium-term
	Adequate wages*	Negative impact (actual)	The seasonality, subcontracting model and diversity of the value chain typical of the construction industry can increase the risk of inadequate wages for value chain workers.		x		x	short-term and medium-term
	Work-life balance	Negative impact (potential)	The potential negative impact related to working hours can also affect the work-life balance, especially if value chain workers work for multiple customers or on sites where conditions change rapidly.		x		x	short-term and medium-term

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
	Health and safety*	Negative impact (actual)	In the construction industry, the physical stress of work tasks and varying and challenging working conditions can affect the health of employees. The work often involves the use of heavy machinery and equipment, which increases noise exposure, as well as the handling of various materials that may involve exposure to harmful substances. In addition, high temperatures and unergonomic working positions during work phases can increase the strain on the musculoskeletal system.	The work of value chain workers at GRK's sites involves the same safety risks as GRK's own workforce. GRK's occupational safety action programme and measures, which are updated annually, aim to minimise negative impacts, but not all risks can be eliminated. However, the same safety policies apply to value chain workers in addition to GRK's own personnel. GRK identifies sites and work phases with an increased risk of harmful substances or dust, for example. This allows us to target measures to employees in the risk group. The construction site action and quality plan and environmental guide contain instructions for dealing with dust and harmful substances. GRK is responsible for notifying the subcontractor of harmful substances on the site, but subcontractors should, as a rule, see to the annual testing of their own employees. Other proactive measures include safety plans, orientation and training, safety observations and site meetings. All near misses and potential accidents are reported and investigated appropriately also with regard to subcontractors' employees.	x		x	short-term, medium-term and long-term
		Negative impact (actual)	The demanding work tasks in the construction sector and the operating environment in the infrastructure sector increase the risk of work-related accidents and fatal accidents.		x			short-term, medium-term and long-term
		Risk	The working conditions of employees in the supply chain can pose a compliance risk. This can add to other operating expenses such as in the form of follow-up, corrective actions or legal costs.		x		x	short-term and medium-term

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Equal treatment and equal opportunities for all	Gender equality and equal pay for equal work	Negative impact (potential & actual)	The construction industry is associated with an increased risk of gender inequality (ILOSTAT), which can increase the likelihood of unfair pay between genders.	GRK investigates the backgrounds of subcontractors in accordance with the guidelines of the contractor's liability. If GRK becomes aware of a report or suspicion of unequal treatment, pay or harassment, GRK is required to submit a request for clarification in accordance with the client's obligation to investigate and liability. GRK investigates all reports received from value chain workers. In addition, GRK's Corporate Sustainability Requirements aim to increase suppliers' awareness of equality. GRK partners must commit to the Corporate Sustainability Requirements for Suppliers, including equal treatment and equal career development in accordance with the principles of fair operations. All employees must have equal opportunities for work, promotion and remuneration regardless of gender.	x		x	short-term and medium-term
		Negative impact (potential)	Construction-related stereotypes, culture, recruitment practices and working environments can contribute to maintaining structures that can lead to gender inequality in employment opportunities, career advancement and treatment of employees.		x		x	short-term and medium-term
	Diversity	Negative impact (potential & actual)	Construction industry operators have an emphasised risk of weak gender diversity at the workplace (ILOSTAT).		x		x	short-term and medium-term
	Measures to prevent violence and harassment at the workplace	Negative impact (potential)	Discrimination and harassment at the workplace can impair the employees' well-being, feeling of safety and working atmosphere. Such situations can lead to reduced work ability, sickness absences and personnel turnover.		x		x	short-term and medium-term

## Governance information

### G1 Business conduct

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Protection of whistleblowers		Negative impact (potential)	An ineffective whistleblowing channel or inadequate whistleblower protection can have a negative impact on whistleblowers.	GRK's anonymous whistleblowing channel is available to both the company's own personnel and all stakeholders. All reports are handled appropriately, and the protection of the whistleblower is always ensured so that their identity is not disclosed and the whistleblower or their employment relationship is not harmed. GRK's Chief Legal Officer is responsible for processing reports received through the whistleblowing channel together with an external expert service representative. The external expert contributes to ensuring that all reports received through the channel are processed equally.		x		short-term and medium-term
		Risk	Non-compliance with whistleblower protection legislation can increase other operating expenses through fines, policy changes or regulatory proceedings, for example.		x	x	x	short-term
Relations with suppliers		Positive impact (actual)	Regular and effective cooperation with our partners and smooth and fair payment practices improve the operational capacity of GRK's partners. Effective cooperation is seen as a key factor in building sustainable success.	GRK's policies are recorded in GRK's Corporate Sustainability Requirements for Supplier provided to partners. GRK's payment terms (usually a maximum of 30 days) support responsible and fair cooperation, providing even smaller operators better prerequisites for operating profitably and in the long term as GRK's partner and supplier.	x	x		short-term and medium-term
Corruption and bribery	Prevention and detection, including training	Negative impact (potential)	The construction of public projects often requires significant public funding and regulatory oversight, which can create opportunities for corrupt practices such as bribery and fraud. This is particularly emphasised in situations where contracts are awarded, permits are issued or inspections are carried out.	GRK has the Principles of Fair Operations and related training in place. Operations are also guided by anti-corruption principles and competition law guidelines. Every GRK employee must complete the training on the Principles of Fair Operations annually. GRK's policies are also described in the Group's Corporate Sustainability Requirements for Suppliers, to which the company requires all partners to commit. In addition, the whistleblowing channel, which is open to all stakeholders, makes it possible to report grievances completely anonymously. A representative of an external expert service is also involved in processing the reports to ensure that all suspected misconduct and violations are processed equally.	x	x	x	medium-term
		Risk	The construction industry involves an increased risk of corruption and bribery, especially in cooperation with the public sector. A risk can also arise if the whistleblowing channel process does not work.		x	x	x	medium-term

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Political influence and lobbying activities		Negative impact (potential)	The construction of significant infrastructure projects requires the approval, funding and compliance with regulations of the operating country's government. As projects have a broad impact, they can be subject to political influence from various stakeholders, such as construction companies, environmental organisations and local communities. Stakeholders may seek to influence legislation, funding decisions or regulations that may affect the construction and operation of projects.	GRK does not engage in politics, does not participate in political activities and refrains from all support for political activities.	x	x	x	medium-term
		Risk	Lack of transparency or inconsistency in political engagement can pose a regulatory compliance risk, as authorities require consistent reporting of lobbying activities, donations and advocacy. This can increase other operating expenses costs through audits, policy reviews, or regulatory compliance reforms, for example.		x	x	x	medium-term

## Entity-specific disclosures

Sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Development of social infrastructure	Positive impact (actual)	We participate in the development of social infrastructure by building infrastructure that is vital to society. These projects improve safety, accessibility and the functioning of society. The positive impacts particularly concern GRK's customers in the downstream value chain.	The infrastructure built by GRK, such as roads, highways, railways and bridges, supports people's mobility, the smoothness of everyday life and regional development. In many of our projects, the client is responsible for taking into account the requirements of society. GRK, on the other hand, focuses on taking quality, safety and environmental criteria into account in all work. GRK's work is guided by a certified quality management system that takes occupational, environmental and operational safety into account. GRK Group's goal is to deliver a flawless product or service to the customer within the agreed timetable and with professional service. The key pillar of our strategy is profitable growth, which is pursued by offering services, solutions and products that are cost-effective and of high quality.		x	x	medium-term
Development of industrial infrastructure	Positive impact (actual)	The infrastructure built by GRK promotes industrial infrastructure by responding to the needs of various industrial areas and undertakings, among other things. High-quality infrastructure solutions facilitate the realisation of industrial investments and sustainable growth.	GRK's strategy takes into account geopolitical changes, economic outlooks and megatrends. Our view is that projects related to the sustainable transition of industry and the construction of energy infrastructure are accelerating infrastructure construction. Energy efficiency, circular economy, low emissions and stopping biodiversity loss are at the heart of sustainable infrastructure construction. In accordance with the strategy, GRK wants to strengthen its share in green transition projects.		x	x	medium-term

### Summary of the interaction of sustainability topics with the strategy and business model

**E1:** Managing and leveraging climate-related risks and opportunities is an essential part of the implementation of GRK's strategy. Negative climate impacts are attributable to the company's business operations, as we use significant amounts of materials and energy-related resources in our business. The positive impact of creating sustainable solutions for our customers is part of our strategy. GRK's strategic goal of strengthening our share in green transition projects and expanding into new areas of infrastructure construction, such as electricity network construction, links the material sustainability themes to our strategy. Climate-related impacts primarily originate from GRK's own operations, as both positive and negative impacts—such as the level of emissions generated, energy consumption, and the potential to implement energy efficiency measures—are dependent on GRK's activities, the measures implemented, and the company's development pathways.

**E2:** Infrastructure construction puts pressure on the environment, which means that the impacts related to the pollution of air, water and soil are strongly related to GRK's business. Spills of fuels and chemicals can cause a risk of soil and water pollution and be hazardous to health. GRK is involved in material impacts through its own operations, as the impacts are potential consequences of GRK's operations. GRK's material impacts and risks related to pollution are primarily associated with individual incident situations rather than continuous emission loads.

Based on the double materiality assessment, GRK identified potential negative impacts related to the storage and use of chemicals, as well as concerns regarding employees' exposure to substances of concern and substances of very high concern. GRK actively seeks safer alternative substances and ensures the appropriate handling and storage of chemicals. As the quantities of chemicals used are not material in relation to the scale of GRK's operations and do not reflect the magnitude of impacts, GRK does not report the volumes of substances of concern or substances of very high concern used. GRK's material impacts therefore relate to chemical storage, safe use of chemicals, and exposure during use.

**E4:** Infrastructure construction causes changes in land use and can thus deteriorate the quality of the soil and reduce the number of trees. In addition, GRK's operations and the climate impacts of our value chain can indirectly impair biodiversity through climate change. As construction is GRK's core business, these negative impacts are a result of our business.

GRK takes these impacts into account with the help of the Nature and Climate Roadmap, which guides our operations towards a lower strain on nature. Actors in the value chain are guided to take biodiversity into account through Corporate Sustainability Requirements for Suppliers.

**E5:** Infrastructure construction generally uses significant amounts of natural resources and generates significant amounts of waste. As infrastructure construction is part of GRK's core business, these negative impacts originate from GRK's business. GRK emphasises resource efficiency and the promotion of the circular economy in its operations, and GRK is involved in material impacts through its own operations. The impacts originate from our strategy and business model, and therefore we use secondary and recycled materials whenever this is technically and economically feasible and approved by the client. This supports GRK's financial performance and reduces the environmental impact. Our circular economy business, which includes 19 areas with environmental permits in Finland, facilitates the efficient reuse of soil and demolition materials. The circular economy is one of the key themes for achieving sustainable infrastructure construction.

**S1:** Competent and thriving personnel is a cornerstone of GRK's strategy. Project-based infrastructure construction is characterised by seasonal fluctuation. This operating model may have negative effects on the employment security and training of personnel. Seasonal fluctuations can lead to uncertainty in employment relationships and challenges in arranging regular training for all employees. GRK's strategic goal of being an attractive employer is reflected in investments in the well-being of the personnel, competence development and long-term employment relationships. These measures aim to mitigate the negative impacts and strengthen the positive impacts resulting from the business model, such as employee commitment and continuity of competence. Training and skills development are seen as a strategic opportunity that supports the career development of employees and the company's competitiveness.

Health and safety are particularly significant areas of impact in GRK's operations. Physically demanding tasks in the construction industry and risks in the working environment can have a negative impact on the well-being of employees. GRK's certified operating system (ISO 45001) and comprehensive safety practices and training are key means of managing these impacts.

Equity and diversity are also essential topics. GRK recognises the gender diversity challenge typical of the industry and actively seeks to promote diversity and equality through training and transparent recruitment practices. GRK is primarily involved in these above-mentioned impacts through its own operations, as the employees are directly employed by the Group companies.

**S2:** Based on the double materiality analysis, the impacts, risks and opportunities related to GRK's value chain workers were identified as being related to working conditions and equal treatment and equal opportunities. The impacts related to employment security, working hours, adequate wage and work-life balance are seen to originate from GRK's business model, in which project-based and seasonal work can have a negative impact on value chain workers. In addition, the employees of GRK's subcontractors in particular are seen to be subject to the negative health and safety impacts typical of the construction environment, which also concern GRK's own personnel. These impacts include the negative impact of the physical stress of work tasks and varying conditions on the health of employees, as well as the risk of work-related accidents and fatalities caused by the conditions. Negative impacts related to gender equality and equal pay for equal work as well as diversity also arise from GRK's business model and the culture of the construction industry.

The identified positive impact on employment security is connected to GRK's strategy. GRK offers employment and livelihoods to a large number of people in the value chain in addition to its own employees, and long-term partnerships with subcontractors have been a key part of GRK's success. GRK requires value chain workers to commit to the Principles of Fair Operations, to which we are committed in our own operations. Were GRK not able to combat violence and harassment in the workplace with the help of supplier requirements and the whistleblowing channel, it would have a negative impact on the company's operations arising from the strategy.

GRK's material impacts, risks and opportunities are managed through, for example, supplier background checks, Corporate Sustainability Requirements, site induction, regular communication and audits. In accordance with the values included in GRK's strategy, we take responsibility for each other, our work and the future and strive for regular cooperation with our partners.

**G1:** GRK has identified an ineffective or unreliable whistleblowing channel and inadequate whistleblower protection as a potential negative impact that could jeopardise the well-being of whistleblowers and their willingness to raise concerns. In addition, an ineffective whistleblowing channel and failure to react to unethical conduct can pose a financial risk, for example through fines or official proceedings. GRK's strategy emphasises an honest and uniform operating culture. A functioning whistleblowing channel supports this by promoting open and straightforward operations that are part of GRK's values.

Regular and smooth cooperation with suppliers and contractor partners and fair payment practices are seen to have a positive impact on supplier relationships and payment practices. The values included in GRK's strategy emphasise cooperation and unity with partners and customers.

GRK's business is linked to public infrastructure investments, which may result in exposure to corruption and bribery. Public sector projects account for more than one-half of GRK's customer accounts. The occurrence of corrupt practices poses a financial risk if they were to occur. GRK has zero tolerance for corruption and bribery, and the strategic goal of being a forerunner in sustainable construction also requires ethical governance.

Infrastructure construction projects often have a broad social impact and involve political decision-making. For this reason, political influence has been identified as a potential negative impact related to the business sector. In addition, inconsistent influencing may pose a regulatory compliance risk to the company. GRK has deliberately adopted a policy of not participating in or supporting political activities. This policy implements GRK's values of acting straightforwardly and focusing on the essentials in order to achieve a good result.

#### Entity-specific disclosures

Entity-specific disclosures refer to sustainability information related to GRK's

business, which may not be included in the general standards, but is relevant to GRK's operations.

#### Impacts on social and industrial infrastructure

The double materiality analysis identified positive entity-specific impacts of GRK's operations related to the construction of infrastructure that promotes society and industry. These positive impacts particularly concern GRK's customers in the downstream value chain.

The positive impacts are manifested in both social and industrial infrastructure. Roads, highways, railways and bridges built by GRK improve the functionality, safety and accessibility of society. They support regional development and, at the same time, smooth day-to-day life. In addition, GRK's solutions support the operating conditions of our industrial customers, such as sustainable and efficient transport infrastructure that serves the economy.

#### Financial effects

During the financial year, no material financial effects on the Group's income statement, balance sheet or cash flows that would have resulted from significant sustainability risks were observed. New low-carbon construction opportunities have been identified as an opportunity, and these had an impact already during the reporting period. During the financial year, GRK implemented, for example, a significant green transition industrial project for Stegra in Sweden, and also other green transition projects. GRK has not identified any significant sustainability-related risks and opportunities that could result in material adjustments to the carrying amounts during the next financial year.

GRK has not analysed the resilience of the company's strategy or business model.

#### Non-material sustainability topics

Based on the double materiality analysis, the following sustainability topics have not been deemed as material for GRK.

**E3:** Based on the double materiality analysis, GRK has assessed that the impacts, risks and opportunities related to the use and management of water and marine

resources are not material for GRK. Infrastructure construction does not include significant water withdrawal, water treatment or activities in marine areas. Any potential impacts on water can be managed through permit processes and regulatory requirements. The topic does not create a strategic risk or business opportunity.

**S3:** Based on the double materiality analysis, GRK has assessed that the impacts, risks and opportunities related to the local communities are not material to GRK. GRK mainly operates in infrastructure projects in which community impacts are assessed and managed as part of authority-controlled environmental impact assessment (EIA) procedures and other permit processes. Moreover, GRK does not have any permanent sites or production facilities that would have long-term or significant impacts on the local communities.

**S4:** Based on the double materiality analysis, GRK has assessed that the impacts, risks and opportunities concerning consumers and end-users are not material for GRK, as GRK does not have material business operations at the consumer interface. It is the responsibility of the clients of the projects to take consumers into account already in the planning phase. Through proactive measures such as quality control, GRK ensures that the infrastructure we construct improves the health and safety of end-users and supports the functioning of society.

### IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities

#### Methods to identify impacts, risks and opportunities

GRK's double materiality analysis is based on the Upright Project model. Based on this model, GRK's own analysis was carried out, identifying GRK's key sustainability topics that have a significant impact on either our financial result and/or environmental and social impacts. All results of the double materiality analysis have been reviewed and, if necessary, modified and approved by GRK.

The data and method of the double materiality analysis have been used to support the identification of impacts, risks and opportunities and the determination of which of these are material for GRK. The analysis aimed to ensure the consistency, comparability and scientific reliability of the results. The accuracy

of the results was achieved by including GRK's business model, geographical context and other company-specific factors, such as business relationships, in the analysis. In addition, the views of stakeholders were taken into account through surveys.

The double materiality analysis data platform combines different data sources and applies the ESRS guidelines to assess the materiality of impacts using the metrics likelihood, scale, scope and irremediable character of the impact, and the financial materiality using the metrics magnitude and likelihood. The results of the analysis cover all ESRS sustainability aspects and provide additional information in accordance with the ESRS guidelines.

The primary data source for the double materiality analysis is the CORE database, which contains numerous scientific articles and third-party data from reliable sources. In addition, the analysis utilises GRK's product and service portfolio (including revenue breakdowns), selected sustainability metrics, geographical information about suppliers, our own operations and customers, and stakeholder views through surveys.

GRK has reviewed the impacts, risks and opportunities identified in the analysis with the business functions and experts of internal services. If necessary, GRK has modified or added impacts, risks and opportunities after assessing the impact materiality through likelihood, scale, scope and irremediable character, as well as economic materiality through magnitude and likelihood.

GRK's climate risk analysis has been carried out separately from the double materiality analysis process, but the results have been taken into account and reviewed as part of GRK's DMA process. The process covers our own operations as well as the upstream and downstream value chain. For the 2025 reporting year, GRK calculates greenhouse gas emissions covering Scope 1, Scope 2 and material Scope 3 categories. The emissions data provide the foundation for identifying impacts and defining further measures.

GRK has identified climate-related physical risks, such as flood risks, drought periods and extremes of weather, which may affect the implementation and costs of projects. The assessment of these risks covers our own operations and the value chain. A climate scenario analysis has not yet been prepared, but its

deployment is planned as part of the development of sustainability reporting.

GRK has screened its business to identify the actual and potential impacts, risks and opportunities related to pollution in its own operations and upstream and downstream value chain. The screening was carried out in connection with the double materiality analysis. No separate site screening has been prepared. GRK takes potential environmental impacts into account in its daily operations through risk analyses.

GRK has identified that the impacts of its own operations and value chain on water resources and marine resources are minor due to low water use. GRK did not organise separate consultations related to water resources and marine resources as part of the double materiality analysis.

GRK has examined the relationship between its own operations with biodiversity and ecosystems as part of the double materiality analysis. As a rule, decisions related to impacts on biodiversity and ecosystems are made already in the land-use planning phase. GRK operates in accordance with the plans and any environmental permits and conditions set by the client, and GRK has no direct influence over the land-use planning phase. However, GRK recognises the significant use of raw materials and the potential impact of its own operations on climate change and thereby on biodiversity and the natural functions of ecosystems. GRK has not identified sites with impacts in biodiversity-sensitive areas, and the company has not found it necessary to implement mitigating measures related to biodiversity in its assessment. Therefore, GRK has not had a need to implement any mitigation measures specified, for example, in Directive 2009/147/EC on the conservation of wild birds, Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, Directive 2011/92/EU on environmental impact assessments or, with regard to third countries, national regulations or international standards, such as the IFC Environmental and Social Performance Standard 6. If GRK's projects are located in or close to biodiversity-sensitive areas, any measures are implemented in accordance with the client's instructions or the environmental permit for the area. GRK has not reviewed systemic risks or organised separate consultations related to biodiversity and ecosystems as part of the double materiality analysis.

GRK has screened its business to identify actual and potential impacts, risks and opportunities related to resource use and the circular economy in its own operations and upstream and downstream value chain. Infrastructure construction activities involve a significant inflow of resources and the generation of waste, for example. The screening was carried out in connection with the double materiality analysis. GRK has not organised separate consultations related to resource use as part of the double materiality analysis.

In assessing the impacts related to business conduct, GRK's products and services that reflect GRK's business as a whole have been taken into account. In addition, GRK's industry has been taken into account, as the business sector may be associated with potential impacts related to corruption and bribery. The third criterion is location, and the last one is the information collected from GRK, such as any incidents of corruption which could affect the impacts related to business conduct. All impacts have been analysed throughout the value chain, covering the entire business with stakeholders.

Companies included in the Group as a result of acquisitions did not result in any new material IROs (impacts, risks and opportunities) that would not already have been identified as material for GRK. Therefore, no changes to the double materiality analysis or the areas to be reported emerged.

### Assessing, prioritising and monitoring impacts on people and the environment

The impacts on people and the environment were compiled on the basis of scientific articles and GRK's data sets.

The following were taken into account in assessing the impact materiality:

- GRK's products and services
- GRK's business sector
- The geographical location of GRK's own operations, suppliers and customers
- Key personnel and safety information
- Results of stakeholder surveys

GRK's products and services were analysed as part of the double materiality analysis. To ensure the coverage of the value chain analysis, GRK utilised the product map applied in the double materiality analysis. This is part of a broad model that describes the products and services offered by the private sector and the value chain relationships between them. The model is used to understand the value chains of an undertaking and to identify the material impacts, risks and opportunities that may result from them. The product map also enables analysis up to Tier 2, Tier 3 and Tier-n operators. In addition, geographical assessments analyse GRK's value chain data.

With regard to negative impacts related to human rights, the likelihood of the impact has been assessed to be higher than it actually is by increasing the likelihood of the impact. This methodology ensures that all potential negative human rights impacts are taken into account.

The following sub-sub-topics, the emerging impacts of which may clearly violate fundamental human rights, have been identified as potential negative human rights impacts:

- S1 & S2: Secure employment, working time, adequate wage, freedom of association, health and safety, child labour, forced labour, adequate housing, privacy, water and sanitation
- S3: Adequate housing, adequate food, water and sanitation, security-related impacts, freedom of expression, freedom of assembly, impacts on human rights defenders, self-determination, free, prior and informed consent, cultural rights
- S4: Privacy, freedom of expression, health and safety, security of a person, protection of children

GRK has assessed potential negative human rights impacts that have remained non-material together with internal experts and thus ensured that the double materiality analysis has not excluded any material impacts for GRK.

#### Consultation with affected stakeholders and management interviews

Affected stakeholders were taken into account through custom stakeholder

surveys. The stakeholder survey was sent to representatives of GRK's employees, suppliers and investors. In addition, the following departments were surveyed among GRK's support functions: sustainability and risk management, procurement, legal, finance and HR.

Consultations with affected communities were not conducted as part of the process of identifying material impacts, risks and opportunities related to pollution, water and marine resources, biodiversity and ecosystems, or resource inflows, resource outflows and waste.

Scientific articles provided additional understanding of the impacts of silent stakeholders in particular. Following the responses received, possible differences between stakeholder views and scientific analysis were included in GRK's double materiality analysis. In general, scientific data was the primary source in the double materiality assessments, and stakeholder views served as complementary observations and quality assurance.

At GRK, the double materiality assessment was carried out by a team of changing experts who assessed the impacts, risks and opportunities identified in GRK's double materiality analysis. The outcome of the work was reviewed by the Group's Management Team and the Board of Directors.

#### Impact assessment, prioritisation and determination of matters relevant to reporting

In GRK's double materiality analysis, the materiality scores were calculated using the following formula:

Materiality score = scale × scope × irremediable character of impact\* × likelihood

\*The irremediable character of the impact is only included in the calculation for negative impacts

With regard to impacts, the impact of each product and service has been assessed separately and the materiality scores for the Group's impact were obtained on the basis of these. When assessing products and services, their share of revenue has been used in the assessment of the scope. The scores for the same impact have been aggregated across all products and services to derive the total score for the impact.

All factors were rated on a scale of 1–4 (Very low = 1, Low = 2, Medium = 3, High = 4). For actual impacts, likelihood has always been given the highest value of 4. Potential impacts have been assessed on a scale of 1–4. If the score for an individual impact was at least 20, it was considered to be material and reported in GRK's sustainability report. The threshold is based on GRK's assessment and has been calculated to ensure that all material impacts are taken into account.

#### Assessing, prioritising and monitoring risks and opportunities

In the first phase, the data platform used in double materiality assessment produced a wide list of risks and opportunities based on scientific articles and data. The assessment process is based on a model library of risks and opportunities, which contains more than 1,000 combinations of impacts, risk drivers and affected financial items.

GRK's risks and opportunities were assessed by using company-specific information, such as product and service portfolio, business type, value chains and geographical location. Impact-driven risks and opportunities arise from the material impacts caused by GRK. Risks and opportunities based on dependencies are related to natural resources and dependencies on people and social resources.

In assessing financial materiality, the impact was considered material if the impact of an individual risk or opportunity is  $\geq 0.5\%$  of the Group's equity. The threshold is based on GRK's view and has been calculated in such a way that all material risks and opportunities are taken into account. The financial effect was calculated using the following formula:

Financial effect = likelihood × magnitude of the effect × value of the affected financial item

The likelihoods are assessed on a four-level scale (Very low = 2.5%, Low = 10%, Medium = 25%, High = 50%). The levels of impact magnitude are based on scientific sources, external classifications and an assessment of the potential magnitude of the financial effect in relation to the usual cost structure or market prices. The time horizon of the impact and its recurrence have also been taken into account in calculating the financial effect.

At GRK, risk assessments are carried out twice a year using a risk assessment tool. The risk assessment involves senior management and construction managers. The risk assessment survey also includes questions related to sustainability. The risks identified as material through the double materiality analysis, which was carried out separately from the risk assessment process, have been addressed by the GRK Group Management Team. Sustainability risks are assessed as part of the company's operations similarly to other Group-level risks.

#### **Decision-making and internal control procedures**

GRK's Board of Directors and Management Team have reviewed and approved the double materiality assessment process. The first analysis was carried out in 2023. For the 2025 reporting period, the analysis was expanded to align with ESRS standards, and stakeholder interviews and internal expert assessments were included in the assessment process for the first time. The sustainability team consisting of GRK's changing experts, coordinated by the Chief Business Development Officer, is responsible for collecting data and reporting the results to the management.

GRK's internal control framework for financial reporting is supplemented with guidelines, systems and controls related to sustainability and responsibility reporting in compliance with the requirements of legislation on sustainability reporting.

The CEOs and financial administrations of GRK Group companies are responsible for ensuring that controls related to financial reporting and sustainability reporting are defined and that they are effective, adequate and up-to-date in each company. The accuracy and reliability of financial reporting and sustainability reporting is also assessed as part of the internal reporting included in the management system.

GRK's Board is responsible for monitoring and assessing the company's financial reporting and sustainability reporting. The Audit Committee of the Board assists the Board in fulfilling its supervisory responsibilities. After the Audit Committee's review, GRK's Board approves the company's interim and half-year reports, financial statements release, financial statements and report of the Board of Directors as well as the sustainability statement included in the report. The

Audit Committee monitors and evaluates the financial reporting processes and the sustainability reporting process as well as the effectiveness of the internal control processes that ensure the reliability of financial reporting and sustainability reporting. The Audit Committee also conducts annual discussions with the external auditor and the sustainability reporting assurance provider to determine whether the work of the auditor or the sustainability reporting assurance provider has indicated any deficiencies in financial reporting or sustainability reporting or internal control.

## IRO-2 Disclosure requirements covered by the sustainability report

The disclosures related to impacts, risks and opportunities have been classified as material based on the double materiality analysis carried out by GRK. This process is described in section IRO-1 of the report, and the material disclosures and their impact on GRK's strategy, business model and value chain are described in section SBM-3 of the report.

### Disclosure requirements identified based on the materiality assessment and their location in the sustainability report

#### ESRS Content Index

ESRS standard	Disclosure requirement	Page number
<b>General disclosures</b>		<b><a href="#">25</a></b>
BP-1	General basis for preparation of sustainability report	<a href="#">25</a>
BP-2	Disclosures in relation to specific circumstances	<a href="#">25</a>
GOV-1	The role of the administrative, management and supervisory bodies	<a href="#">26</a>
GOV-2	Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies	<a href="#">26</a>
GOV-3	Integration of sustainability-related performance in incentive schemes	<a href="#">31</a>
GOV-4	Statement on due diligence	<a href="#">31</a>
GOV-5	Risk management and internal controls over sustainability reporting	<a href="#">31</a>
SBM-1	Strategy, business model and value chain	<a href="#">31</a>
SBM-2	Interests and views of stakeholders	<a href="#">34</a>
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">36</a>
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	<a href="#">50</a>
IRO-2	Disclosure requirements covered by the sustainability report	<a href="#">54</a>

ESRS standard	Disclosure requirement	Page number
<b>Environmental disclosures</b>		<b><a href="#">62</a></b>
EU Taxonomy		<a href="#">62</a>
<b>Climate change</b>		<b><a href="#">67</a></b>
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	<a href="#">31</a>
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	<a href="#">50</a>
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">69</a>
E1-1	Transition plan for climate change mitigation	<a href="#">69</a>
E1-2	Policies related to climate change mitigation and adaptation	<a href="#">70</a>
E1-3	Actions and resources in relation to climate change policies	<a href="#">71</a>
E1-4	Targets related to climate change mitigation and adaptation	<a href="#">71</a>
E1-5	Energy consumption and mix	<a href="#">72</a>
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	<a href="#">74</a>
<b>Pollution</b>		<b><a href="#">78</a></b>
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	<a href="#">50</a>
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">79</a>
E2-1	Policies related to pollution	<a href="#">79</a>
E2-2	Actions and resources related to pollution	<a href="#">79</a>
E2-3	Targets related to pollution	<a href="#">80</a>
<b>Biodiversity and ecosystems</b>		
BP-2	Disclosures in relation to specific circumstances	<a href="#">25</a>

ESRS standard	Disclosure requirement	Page number
<b>Resource use and circular economy</b>		
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	<a href="#">82</a>
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">83</a>
E5-1	Policies related to resource use and circular economy	<a href="#">83</a>
E5-2	Actions and resources in relation to resource use and circular economy	<a href="#">83</a>
E5-3	Targets related to resource use and circular economy	<a href="#">84</a>
E5-4	Resource inflows	<a href="#">85</a>
E5-5	Waste	<a href="#">86</a>
<b>Social disclosures</b>		
<b>Own workforce</b>		
ESRS 2 SBM-2	Interests and views of stakeholders	<a href="#">34</a>
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	<a href="#">90</a>
S1-1	Policies related to own workforce	<a href="#">91</a>
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	<a href="#">94</a>
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	<a href="#">95</a>
S1-4	Taking action on material impacts on own workforce	<a href="#">96</a>
S1-5	Targets related to managing material negative impacts and risks and opportunities and advancing positive impacts	<a href="#">98</a>
S1-6	Characteristics of the undertaking's employees	<a href="#">100</a>
S1-8	Collective bargaining coverage and social dialogue	<a href="#">101</a>
S1-9	Diversity metrics	<a href="#">102</a>
S1-14	Health and safety metrics	<a href="#">102</a>
S1-16	Remuneration metrics	<a href="#">102</a>
S1-17	Incidents, complaints and severe human rights impacts	<a href="#">103</a>

ESRS standard	Disclosure requirement	Page number
<b>Workers in the value chain</b>		
BP-2	Disclosures in relation to specific circumstances	<a href="#">25</a>
<b>Governance disclosures</b>		
ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies	<a href="#">26</a>
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	<a href="#">50</a>
G1-1	Business conduct policies and corporate culture	<a href="#">106</a>
G1-2	Management of relationships with suppliers	<a href="#">107</a>
G1-3	Prevention and detection of corruption and bribery	<a href="#">108</a>
G1-4	Incidents of corruption or bribery	<a href="#">109</a>
G1-5	Political Influence and lobbying activities	<a href="#">109</a>
G1-6	Payment practices	<a href="#">109</a>
<b>Entity-specific disclosures</b>		
ESRS 2	Impacts on social and industrial infrastructure	<a href="#">111</a>

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

The following table lists the ESRS data points that derive from other EU legislation and the page numbers where other datapoints considered material are reported. Datapoints that have not been considered as material are marked as "not material" and datapoints that have been excluded due to the transitional provisions used are marked as "phase-in".

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27), Annex II		<a href="#">28</a>
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		<a href="#">28</a>
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				<a href="#">31</a>
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicator number 4 Table #1 of Annex 1	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegoitu asetetus (EU) 2020/1816, liite II		Not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (29) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	<a href="#">69</a>
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Not material
ESRS E1-4 GHG emission reduction targets paragraph 34	Liitteen 1 taulukon 2 indikaattori 4	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book-Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		<a href="#">71</a>

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				<a href="#">73</a>
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				<a href="#">73</a>
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				<a href="#">73</a>
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		<a href="#">75</a>
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book-Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		<a href="#">76</a>
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Phase-in
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Phase-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book-Climate Change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Phase-in

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Phase-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1, indicators number 1, 2 and 3 Table #2 of Annex 1				Not material
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material
ESRS 2- SBM-3 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Phase-in
ESRS 2- SBM-3 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Phase-in
ESRS 2- SBM-3 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Phase-in
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Phase-in
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Phase-in
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Phase-in
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				87
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				87

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS 2 – SBM-3 – S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex 1				<a href="#">90</a>
ESRS 2 – SBM-3 – S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex 1				<a href="#">90</a>
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				<a href="#">91</a>
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		<a href="#">91</a>
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				<a href="#">91</a>
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				<a href="#">91</a>
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				<a href="#">95</a>
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		<a href="#">102</a>
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				<a href="#">102</a>
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		<a href="#">102</a>
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				<a href="#">102</a>
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				<a href="#">103</a>
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		<a href="#">103</a>

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS 2 – SBM-3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Phase-in
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Phase-in
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Phase-in
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Phase-in
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Phase-in
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Phase-in
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Not material
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Not material
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Not material
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Not material
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				Not material

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				<a href="#">107</a>
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		<a href="#">108</a>
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				<a href="#">108</a>

## ENVIRONMENTAL INFORMATION

# EU Taxonomy

## Group reporting in accordance with Article 8 of the Taxonomy Regulation 2020/852

The EU Taxonomy is a classification system for sustainable finance that aims to guide investments towards environmentally sustainable activities and contribute to the EU's climate goals. The EU Taxonomy is a key part of the European Green Deal and aims to advance the transition to a low-carbon, resource-efficient and sustainable economy.

The Taxonomy Regulation defines what can be considered environmentally sustainable. The Regulation sets six environmental targets: 1) climate change mitigation, 2) climate change adaptation, 3) sustainable use and protection of water and marine resources, 4) transition to a circular economy, 5) pollution prevention and control, and 6) protection and restoration of biodiversity and ecosystems. Activities that contribute to any of these goals while not causing harm to others can be considered environmentally sustainable.

GRK reports in accordance with the EU Taxonomy for the first time for the financial year ended 31 December 2025. GRK has not prepared a financing strategy aligned with the EU Taxonomy.

### Assessment of taxonomy eligibility and alignment

For the disclosures, GRK has compared its financial activities with those included in the Delegated Acts. In civil engineering and road construction, the assessment has been carried out on a project-by-project basis, as the projects include taxonomy-eligible and non-taxonomy-eligible activities. The taxonomy activities identified in civil engineering and road construction in 2025 are CCM 4.9 Transmission and distribution of electricity, CCM 4.11 Storage of thermal energy, CCM 5.1 Construction, extension and operation of water collection, treatment and supply systems, CCM 5.3 Construction, extension and operation of waste water collection and treatment, CCM 6.13 Infrastructure for personal mobility, cycle logistics, CCM 6.14 Infrastructure for rail transport, WTR 2.2 Urban wastewater treatment, CE 3.5 Use of concrete in civil engineering and PPC 2.4 Remediation of

contaminated sites and areas. Of the paving projects included in civil engineering and road construction, those that have maintained the condition of the roads are classified in category CE 3.4 Maintenance of roads and motorways. All rail construction projects are eligible under the CCM 6.14 Infrastructure for rail transport category. GRK's rail construction projects are related to rail infrastructure work on railways and tramways, and in Finland, rail construction also includes railway maintenance.

In 2025, 41% of GRK's revenue was within the scope of the EU Taxonomy classification system. After the classification, GRK's taxonomy-eligible activities have been compared with the technical assessment criteria. In activities CCM 6.13 Infrastructure for personal mobility, cycle logistics and CCM 6.14 Infrastructure for rail transport (excluding track maintenance), the criteria for substantial contribution are often met, but not all of the "do no significant harm" criteria are met.

GRK has also assessed the Taxonomy Delegated Act's minimum safeguards criteria with regard to human rights, bribery, corruption, taxation and fair competition at company level. GRK's policies, such as the Principles of Fair Operations and the Human rights policy, define the principles according to which GRK's employees, suppliers and business partners operate. GRK is committed to respecting and supporting internationally recognised labour and human rights standards in its operations. To prevent bribery and corruption, GRK has clear policies in place and training has been included in the training on the Principles of Fair Operations. As the company does not have a documented human rights due diligence process, it interprets that the minimum safeguards are not met.

### Basis of preparation of the taxonomy

The EU Taxonomy turnover indicator corresponds to the revenue presented in the consolidated financial statements (Note 1 to the consolidated financial statements Revenue). Taxonomy-eligible revenue has been calculated on the basis of project-specific revenue from projects with taxonomy-eligible activities. Civil engineering and road construction projects often include both taxonomy-eligible and non-taxonomy-

eligible activities, and in these cases, the taxonomy-eligible portion of the project is divided into several taxonomy activities. The company has ensured that the calculation does not lead to duplicate reporting of revenue. The calculation is made on a project-by-project basis and only includes projects from which the company generates external revenue and does not include internal projects of the company.

In accordance with the EU Taxonomy definition, GRK has included increase in tangible and intangible assets and increase in right-of-use assets in total capital expenditure, including increases in these items resulting from business combinations. The increases are presented in Notes 10. Property, plant and equipment, 11. Leases and 12. Intangible assets. The definition of capital expenditure in the taxonomy differs from GRK's definition of investments, which is cash-based and includes the acquisition of property, plant and equipment and intangible assets in the cash flow statement. All investments in the rail construction business are related to eligible activities and are therefore classified as eligible. For other businesses, the allocation of investments has been made using the activity-specific shares of the turnover indicator, as capital expenditure is not monitored on a project-by-project basis.

In accordance with the EU Taxonomy, GRK's total operating expenditure includes costs related to research and development activities, equipment maintenance and repair, and short-term and low-value asset leases. Total operating expenditure cannot be derived directly from the notes to the consolidated financial statements, as the taxonomy definition of operating expenditure does not fully correspond to any specific item in the financial statements. The majority of the total operating expenditure is related to short-term equipment leases. Taxonomy-eligible operating expenditure have been divided using the turnover indicator's activity-specific shares, as operating expenditure is not monitored on a project-by-project basis.

The KPIs of the eligible financial activities have been collected from the accounting systems.

## Share of turnover derived from products or services associated with taxonomy-aligned economic activities - 2025 data

Financial year 2025	2025			Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm') (h)						Minimum Safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) turnover, 2024 (18)	Category enabling activity (19)	Category transitional activity (20)
	Economic Activities (1)	Code a) (2)	Turnover (3)	Proportion of Turnover, 2025 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)				
		MEUR	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
			0%																
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)			0%																
Of which enabling			0%																
Of which transitional			0%																
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)</b>																			
				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
Transmission and distribution of electricity	CCM 4.9	16.2	2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Storage of thermal energy	CCM 4.11	4.7	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	5.7	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Construction, extension and operation of waste water collection and treatment	CCM 5.3	5.8	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Infrastructure for personal mobility, cycle logistics	CCM 6.13	13.3	2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Infrastructure for rail transport	CCM 6.14	219.1	25%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Urban waste water treatment	WTR 2.2	6.8	1%	N/EL	N/EL	EL	N/EL	N/EL	N/EL										
Maintenance of roads and motorways	CE 3.4	42.4	5%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
Use of concrete in civil engineering	CE 3.5	31.3	4%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
Remediation of contaminated sites and areas	PPC 2.4	11.1	1%	N/EL	N/EL	N/EL	EL	N/EL	N/EL										
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		356.5	41%	30%	0%	1%	1%	8%	0%										
<b>A. Turnover of Taxonomyeligible activities (A.1+A.2)</b>		<b>356.5</b>	<b>41%</b>	<b>30%</b>	<b>0%</b>	<b>1%</b>	<b>1%</b>	<b>8%</b>	<b>0%</b>										
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
Turnover of Taxonomy-non-eligible activities		515.8	59%																
<b>TOTAL</b>		<b>872.3</b>	<b>100%</b>																

**Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2025**

Financial year 2025	2025			Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm') (h)									
Economic Activities (1)	Code a) (2)	CapEx (3)	Proportion of CapEx, 2025 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) CapEx, 2024 (18)	Category enabling activity (19)	Category transitional activity (20)
		MEUR	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
			0%																
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)			0%																
Of which enabling			0%																
Of which transitional			0%																
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)</b>																			
				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
Transmission and distribution of electricity	CCM 4.9	0.6	2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Storage of thermal energy	CCM 4.11	0.2	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	0.2	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Construction, extension and operation of waste water collection and treatment	CCM 5.3	0.2	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Infrastructure for personal mobility, cycle logistics	CCM 6.13	0.4	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Infrastructure for rail transport	CCM 6.14	6.8	22%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Urban waste water treatment	WTR 2.2	0.2	1%	N/EL	N/EL	EL	N/EL	N/EL	N/EL										
Maintenance of roads and motorways	CE 3.4	2.1	7%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
Use of concrete in civil engineering	CE 3.5	0.7	2%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
Remediation of contaminated sites and areas	PPC 2.4	0.4	1%	N/EL	N/EL	N/EL	EL	N/EL	N/EL										
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		11.7	38%	27%	0%	1%	1%	9%	0%										
A. CapEx of Taxonomy-eligible activities (A.1+A.2)		11.7	38%	27%	0%	1%	1%	9%	0%										
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
CapEx of Taxonomy-non-eligible activities		19.3	62%																
<b>TOTAL</b>		<b>31.0</b>	<b>100%</b>																

### Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2025

Financial year 2025	2025			Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm') (h)						Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) OpEx, 2024 (18)	Category enabling activity (19)	Category transitional activity (20)	
	Code a) (2)	OpEx (3)	Proportion of OpEx, 2025 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)				Minimum Safeguards (17)
Economic Activities (1)		MEUR	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
			0%																
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)			0%																
Of which enabling			0%																
Of which transitional			0%																
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)</b>																			
				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)										
Transmission and distribution of electricity	CCM 4.9	0.4	2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Storage of thermal energy	CCM 4.11	0.1	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	0.1	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Construction, extension and operation of waste water collection and treatment	CCM 5.3	0.1	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Infrastructure for personal mobility, cycle logistics	CCM 6.13	0.3	1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Infrastructure for rail transport	CCM 6.14	4.7	21%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Urban waste water treatment	WTR 2.2	0.2	1%	N/EL	N/EL	EL	N/EL	N/EL	N/EL										
Maintenance of roads and motorways	CE 3.4	1.3	6%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
Use of concrete in civil engineering	CE 3.5	0.7	3%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
Remediation of contaminated sites and areas	PPC 2.4	0.3	1%	N/EL	N/EL	N/EL	EL	N/EL	N/EL										
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		8.1	37%	26%	0%	1%	1%	9%	0%										
A. OpEx of Taxonomy-eligible activities (A.1+A.2)		8.1	37%	26%	0%	1%	1%	9%	0%										
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
OpEx of Taxonomy-non-eligible activities		13.9	63%																
<b>TOTAL</b>		<b>22.1</b>	<b>100%</b>																

	Proportion of Turnover / Total turnover			Proportion of Capex / Total CapEx			Proportion of OpEx / Total OpEx	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective		Taxonomy-aligned per objective	Taxonomy-eligible per objective		Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	0%	30%	CCM	0%	27%	CCM	0%	26%
CCA	0%	0%	CCA	0%	0%	CCA	0%	0%
WTR	0%	1%	WTR	0%	1%	WTR	0%	1%
CE	0%	8%	CE	0%	9%	CE	0%	9%
PPC	0%	1%	PPC	0%	1%	PPC	0%	1%
BIO	0%	0%	BIO	0%	0%	BIO	0%	0%

#### Template 1: Nuclear and fossil gas related activities

##### Nuclear energy related activities

1. The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2. The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3. The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

##### Fossil gas related activities

4. The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5. The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6. The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

# E1 Climate change

## E1 Climate change

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Climate change mitigation		Negative impact (potential & actual)	Our operations generate a significant amount of GHG emissions. The GHG emissions generated by GRK's own operations and the operations of value chains cause global warming, which impairs the living conditions of people and nature.	We have prepared the Nature and Climate Roadmap that guides our work towards lower-emission operating methods. We continuously train and develop our operations and have set ourselves the goal of being a forerunner in sustainable construction. We also require our suppliers to follow the same procedures.	x	x	x	short-term, medium-term and long-term
		Negative impact (potential & actual)	Our operations reduce the amount of carbon sinks.	At our construction sites, we make sure that we save trees whenever possible.	x	x	x	short-term, medium-term and long-term
		Positive impact (actual)	We produce low-emission sustainable construction solutions for our customers. Low-emission sustainable construction solutions refer to alternatives to virgin materials or low-emission working methods.	We continue to develop sustainable solutions and actively offer our customers low-emission construction solutions.	x	x	x	short-term, medium-term and long-term
		Risk	The low-carbon transition and its requirements will result in investments and more reporting.	We ensure that our equipment and production facilities are up to date and assess the profitability of new operations in changing circumstances before making investment decisions.	x	x	x	medium-term
		Opportunity	The low-carbon transition offers new construction opportunities through hydrogen networks, electricity networks and, for example, the construction of production plants for the green transition.	We continuously monitor the development of the market and actively develop and offer our expertise to new green transition projects.			x	medium-term

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Adaptation to climate change		Risk	Physical hazards related to climate change, such as increasing floods, storms and fires, drought and heat, can disrupt our suppliers' operations and logistics, causing disruptions to our projects. This will increase the costs of our operations.	We develop our preparedness for the physical hazards of climate change through proactive measures in procurement and our own operations. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x		medium-term
		Risk	The physical hazards of climate change can make it difficult to work safely at infrastructure construction sites and increase the costs of carrying out the work.	We continuously assess the impacts of climate change on the implementation of our work and update our work instructions regularly. If necessary, we will introduce new working methods and tools. We also require our suppliers to follow the same procedures.	x	x	x	medium-term
		Opportunity	Sustainable procurement solutions and decentralised procurement can reduce project delays and additional costs. GRK's sustainable procurement refers to a process that takes into account the environmental and climate impacts of procurement, social impacts and human rights in the supply chain, as well as good governance and ethical operations in supplier relationships, and ensures that the procurements support GRK's sustainability goals.	We will replace material deliveries that are dependent on climate change and sensitive to supply disruptions with sustainable solutions and by decentralising procurement.	x	x		medium-term
Energy		Negative impact (potential & actual)	Our operations consume a significant amount of energy.	We are committed to reducing our energy consumption in accordance with a separate action plan. We also require our suppliers to follow the same procedures.	x	x		short-term and medium-term
		Negative impact (potential & actual)	We use energy-intensive materials in construction.	We are actively looking for new alternative materials and use secondary and recycled materials in our projects whenever feasible.	x	x	x	short-term, medium-term and long-term
		Risk	We are dependent on fossil fuels and raw materials. Their availability problems and price increases pose a risk to our operations.	We are actively looking for new alternative fuels and materials, and we use secondary and recycled materials in our projects whenever feasible.	x	x		medium-term
		Opportunity	Success in energy efficiency and the adoption of fossil-free fuel and material alternatives will reduce our costs in the long term.	We have prepared the Nature and Climate Roadmap that guides our work towards lower-emission operating methods in the short, medium and long term. The roadmap is an annually updated tool that helps us in our aim about ensuring our success in the adoption of alternative fuels and materials.	x	x		long-term

Impacts, risks and opportunities related to climate change mitigation, climate change adaptation and energy

### SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

GRK has aimed to identify the actual and potential impacts, risks and opportunities related to climate change mitigation, climate change adaptation and energy at the upper level for the entire value chain. The analysis covers climate change mitigation, climate change adaptation and energy-related impacts and risks that may affect GRK's strategy, business model and value chain.

GRK currently has only a limited understanding of the impacts, risks and opportunities related to the production and subcontracting of raw materials and materials. Our reporting obligation covers, in all material respects, the emissions from our own operations and from the upstream and downstream parts of our value chain.

GRK's strategic goal is to be a forerunner in sustainable construction. This goal guides the company's operations at all levels and is included in the nature and climate roadmap, which defines measures in the short, medium and long term. A climate resilience analysis has not yet been carried out, but it will be carried out in connection with the preparation of the transition plan for climate change mitigation. The results of the analysis are integrated into the strategy, risk management and investment planning.

During the financial year 2025, none of the identified climate-related risks were realised as a financial effect. GRK's strategy emphasises proactive measures, risk management and leveraging opportunities in green transition projects. The objectives and measures related to climate change mitigation and adaptation are described in more detail in section E1-1-E1-4.

Greenhouse gas (GHG) emissions arising from GRK's operations have been identified as a key negative impact related to climate change mitigation. Emissions arise from both our own operations (Scopes 1 and 2) and the operations of the value chain (Scope 3), and they affect global warming, deteriorating living conditions for people and nature. In addition, our operations can reduce carbon sinks through deforestation, for example. Managing these impacts is a key part of GRK's strategy.

As a positive impact, GRK produces low-emission sustainable construction solutions for its customers. The company continuously develops new technologies

and services that support the green transition. This creates a competitive advantage and strengthens GRK's position in the market.

Investment needs and increasing reporting requirements, which may increase costs, have been identified as transition risks. GRK manages these risks by ensuring that the equipment and production facilities are up to date and by assessing the profitability of new activities before making investment decisions. As an opportunity, the low-carbon transition new business opportunities in, for example, the construction of hydrogen networks, electricity networks and green transition production facilities.

Physical hazards related to climate change, such as increasing floods, storms, drought and heat waves, can disrupt our suppliers' operations and logistics, causing disruptions to projects and increasing costs, have been identified as risks. In addition, extreme weather conditions can make it difficult to work safely at infrastructure construction sites and increase the costs of carrying out the work.

GRK develops its preparedness for the physical hazards of climate change through proactive measures in procurement and its own operations. Risks are considered in the tender and contract phases, and work instructions are regularly updated. If necessary, new work methods and tools are introduced to improve occupational safety in extreme conditions.

Leveraging sustainable procurement solutions and diversifying procurement was identified as an opportunity. By substituting materials that are vulnerable to climate-related impacts and supply chain disruptions with sustainable alternatives, and by diversifying procurement, GRK can reduce project delays and associated costs.

A key negative impact related to energy is the significant energy consumption of GRK's operations, which increases GHG emissions. In addition, we use energy-intensive materials in construction, such as steel and cement. Managing these impacts is an integral part of GRK's strategy.

There is a risk of dependency on fossil fuels and raw materials, availability problems and price increases of which can cause significant costs. GRK manages this risk by actively searching for alternative fuels and materials and by utilising recycled materials whenever feasible.

As an opportunity, improving energy efficiency and adopting fossil-free solutions will reduce costs in the long term and support GRK's strategic goal of being a forerunner in sustainable construction. The nature and climate roadmap is a key tool for achieving these goals.

### E1-1 Transition plan for climate change mitigation

GRK does not yet have a transition plan in accordance with the ESRS standard. Our goal is to prepare a transition plan for climate change mitigation by 2028 as scheduled. GRK is not excluded from the EU's Paris-aligned Benchmark. The assessment is based on the company's business activities and sources of revenue in relation to the exclusion criteria.

Our current climate goal is a long-term commitment: GRK has set itself the goal of achieving climate neutrality by 2050. The commitment is aligned with the EU's climate goals and the Paris Agreement. More detailed milestones and schedules are presented in section E1-4. The targets have not yet been assessed in detail in relation to the 1.5°C target of the Paris Agreement.

The measures in the nature and climate roadmap are specified annually and are based on the following stages:

- In 2025, we have calculated our Scope 1 and 2 emissions.
- In 2028, we will apply for SBTi approval for our emission reduction targets.

The Science Based Targets initiative (SBTi) approval for GHG emission reduction targets serves as the basis for the transition plan. GRK commits to ensuring that the targets set in the transition plan are science-based and compatible with the 1.5°C target of the Paris Agreement.

The current measures and objectives support the transition, but do not yet contain enough information to prepare a transition plan. The objectives and measures related to climate change mitigation are described in more detail in sections E1-3 and E1-4.

## E1-2 Policies related to climate change mitigation and adaptation

GRK's environmental policy and Corporate Sustainability Requirements for Suppliers guide the Group's activities in climate change mitigation and adaptation. The key objective of the environmental policy is to reduce GHG emissions, improve energy efficiency, increase the use of renewable energy, promote the circular economy and prepare for the physical risks of climate change, such as extreme weather phenomena. The environmental policy is based on the ISO 14001:2015 certified environmental management system.

The Corporate Sustainability Requirements for Suppliers aim to ensure that suppliers minimise their environmental impact, comply with environmental legislation and use solutions that are as environmentally friendly as feasible. In addition, the Corporate Sustainability Requirements for Suppliers also require GRK's key suppliers to report CO<sub>2</sub> emissions. GRK's supplier requirements are based on the international standards and initiatives that GRK is committed to complying with in its own operations, such as operations in accordance with the ISO 14001:2015 environmental management system. In addition, the requirements are based on applicable national and international environmental legislation.

The policies relate to material impacts, risks and opportunities identified as part of the double materiality analysis. The material impacts, risks and opportunities are described in section SBM-3 of the report and the double materiality analysis process is described in section IRO-1. The environmental policy and Corporate Sustainability Requirements for Suppliers cover climate change mitigation, climate change adaptation, energy efficiency, the adoption of renewable energy and the promotion of biodiversity and resource efficiency. They relate to material impacts such as emissions and use of natural resources, risks such as extreme weather phenomena and carbon risks in the value chain, as well as opportunities such as low-carbon solutions and circular economy.

Key actions of our policies and their links to topics:

- a) Climate change mitigation
  - Reducing emissions in our own operations (sites, equipment, offices)
  - Carbon footprint reporting requirement for key suppliers (steel, cement, aggregate, bitumen, aluminium, copper, wood)
  - Circular Economy Green Deal commitment and increasing the efficiency of material recycling
- b) Climate change adaptation
  - Preparing for extreme weather phenomena and physical risks at construction sites
  - The nature and climate roadmap guides risk management and measures
  - HSEQ team instructions and training for personnel
- c) Energy efficiency
  - The ISO 14001:2015 environmental management system guides energy efficiency measures
- d) Deployment of renewable energy
  - Investigations of technological solutions (e.g. electrified equipment, biofuels)
- e) Other (biodiversity and resource efficiency)
  - The nature and climate roadmap includes measures to improve diversity
  - Developing material efficiency and waste management
  - Suppliers are required to be resource efficient and protect the environment

GRK's environmental policy covers the Group's own activities and partners in the value chain through the Corporate Sustainability Requirements for Suppliers. The Corporate Sustainability Requirements for Suppliers cover the upstream and downstream value chain, especially key suppliers including suppliers of steel, cement, aggregates, bitumen, aluminium, copper and wood. The scope of the

policies covers all of the Group's operating countries and material stakeholders, such as customers, suppliers and subcontractors.

GRK's Chief Risk Officer is responsible for implementing the policies of the environmental policy, and the practical implementation is supervised by the Group's HSEQ team, which is responsible for environmental management, training and monitoring processes. The monitoring process is based on the continuous monitoring of metrics by the Group HSEQ team and the regular reports submitted to the Board, which are reported to the Board of Directors by the Audit Committee.

The metrics used include CO<sub>2</sub> intensity (tCO<sub>2</sub>eq/MEUR), energy consumption (MWh) and the share of renewable energy (%). The HSEQ team monitors the metrics on a monthly basis and reports to the Board on a quarterly basis, and the results are included in the annual sustainability report.

GRK's Chief Legal Officer is responsible for preparing and updating the Corporate Sustainability Requirements together with the procurement function. GRK Group's Chief Risk Officer is responsible for the implementation.

Both policies have been drawn up taking into account the expectations of key stakeholders, in particular customer requirements for low-carbon solutions and supplier responsibility. When drafting the environmental policy, views were collected from clients and suppliers in contract negotiations and joint industry workshops, such as in the preparation of the Green Deal commitment. In addition, customer feedback and supplier assessments are used in the development work.

The environmental policy is available in GRK's internal communication channel, and the Corporate Sustainability Requirements are available to all stakeholders on GRK's website. In addition, suppliers are also informed of the requirements as part of the procurement process.

### E1-3 Actions and resources in relation to climate change policies

GRK's measures related to climate change mitigation and adaptation are based on the Group's environmental policy, ISO 14001:2015-certified environmental management system and on the nature and climate roadmap. The measures support the strategic goal of being a forerunner in sustainable construction and relate to the material impacts, risks and opportunities identified in the double materiality analysis and presented in sections SBM-3 and IRO-1 of the report. The measures implemented promote the objectives of the policy, such as reducing emissions, improving energy efficiency and promoting the circular economy.

The climate measures implemented during the reporting year are based on GRK's operating policies, which guide the reduction of emissions, improving energy efficiency, adopting renewable energy and promoting the circular economy. The policies are included in the country-specific environmental guidelines, which set out practical guidelines and ensure that each project implements the Group's climate goals. The HSEQ team monitors the implementation of these principles and reports on the progress to the Board on a quarterly basis.

GRK has prepared a nature and climate roadmap that guides the work towards lower-emission operating methods. The roadmap includes measures such as increasing the use of renewable energy, improving energy efficiency and using recycled materials.

The key measures implemented during the reporting year included the use of renewable electricity at all construction sites in Finland, the use of renewable fuel in our own diesel-powered production and company cars, and energy efficiency measures, such as avoiding idling, machine control and choosing efficient working methods. In addition, GRK has increased the use of recycled materials and developed a network of circular economy sites, which facilitates the reuse and processing of materials into new products. The country-specific environmental guidelines guide transport planning and material efficiency, which is expected to reduce emissions and costs.

Process changes and technological solutions are continuously developed to reduce emissions in the value chain, we have started cooperation with key suppliers to create principles for climate and biodiversity work. In addition, we have developed nature-based solutions, such as biochar production from recycled materials, which supports both emission reduction and circular economy goals.

Key actions planned for the future include applying for SBTi approval in 2028 and drawing up a transition plan that includes decarbonisation levers and technological solutions.

The current climate change mitigation and adaptation measures cover GRK's own operations (sites, equipment, offices) and the upstream and downstream value chain, especially key suppliers. The time horizons range from short (annual energy efficiency measures) to medium and long (climate neutrality by 2050). The emission reduction impact of the measures implemented in the reporting year has not yet been quantified, but the impact has been estimated to be significant, particularly with regard to the deployment of renewable electricity and fuels.

The current measures and resources related to climate change mitigation and adaptation are part of GRK's day-to-day business, and no separate budget has been set aside for them.

### E1-4 Targets related to climate change mitigation and adaptation

GRK has set itself the goal of achieving climate neutrality by 2050. The current targets cover our own operations (Scopes 1 and 2) and material value chain emissions (Scope 3). The most material Scope 3 emission sources are related to the use of materials and logistics (see E1-6). The targets apply to all of GRK's operating areas (Finland, Sweden, Estonia). The targets have not been assessed against science based criteria (SBTi), nor have they been evaluated in relation to the Paris Agreement. As a result, the ESRS disclosure requirements related to targets are not met.

GRK's long-term goal is climate neutrality by 2050. In addition, GRK has set the following milestones for its emissions:

- By 2035, our absolute goal is to achieve net zero Scope 1 and Scope 2 emissions.
- By 2040, the relative target is to reduce Scope 1, 2 and 3 emissions by 50% compared to 2030 emissions.

GRK has not set a short-term target for 2030, and therefore the target is not presented in E1-6 alongside the reported emissions data.

Our most significant sources of emissions come from the use of materials. Therefore, we have set the target of increasing the use of secondary materials to support our emission reduction targets:

- By 2035, we aim to triple the use of recycled materials from the 2023 baseline of 487,000 tonnes to 1.5 million tonnes (Circular Economy Green Deal, entity-specific indicator). As an interim target, we aim to reach 1.0 million tonnes by 2030.
- By 2035, we aim to triple the annual revenue of the environmental technology unit from the 2024 baseline of EUR 10 million. (Circular Economy Green Deal, entity-specific indicator)

The targets support the management of the impacts, risks and opportunities related to climate change mitigation. We monitor the effectiveness of the measures taken to manage the impacts, risks and opportunities identified as material in relation to energy by, for example, monitoring the Group's energy consumption and the use of renewable fuels. GRK has not set measurable time-bound and result-oriented targets related to climate change adaptation. In the reporting year, GRK has not specifically monitored the effectiveness of policies and measures in relation to material sustainability-related impacts, risks or opportunities or set qualitative or quantitative indicators for monitoring progress.

The decarbonisation levers include improving energy efficiency, fuel switching to low-emission alternatives, increasing the use of renewable energy and improving material efficiency.

The achievement of the targets is monitored annually and reported in the Group's sustainability report. The progress of the targets is also reported to the Board, and they are integrated into GRK's strategic planning and investment decisions. GRK's Group targets are set annually by the Management Team, and stakeholders have not participated in setting the above targets.

### E1-5 Energy consumption and mix

GRK's energy consumption varies according to the situation of the projects being implemented, the ongoing work phases and the seasons. Each project is individual in terms of energy consumption and the amount of energy required to carry out the work. External factors, such as weather and air temperature, have a material impact on energy consumption, as most work is carried out without weather shelters or protective structures that compensate for temperature differences. The most energy-consuming work phases are:

- pile slab construction work, soil replacement work, stabilisation work, piling,
- concreting of bridges and other engineering structures,
- supporting excavations during work and keeping them dry,
- construction site maintenance, such as heating, cooling, lighting, traffic and the use of machinery;
- track superstructure work, such as replacement of sleepers, ballasting and supporting,
- paving work, such as asphalt mass production and transport.

GRK's strategic measures to reduce energy consumption are described in section E1-3. These include, among others, energy efficiency measures such as avoiding idling, machine control and choosing efficient working methods.

GRK's energy consumption data includes fuel consumption and purchased electricity, heat and steam for all construction sites and offices and all of our operating countries. Information on energy consumption and mix is presented in the following table.

Energy consumption and mix	2025
(1) Fuel consumption from coal and coal products (MWh)	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	35,197
(3) Fuel consumption from natural gas (MWh)	0
(4) Fuel consumption from other fossil sources (MWh)	29,556
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	2,812
<b>(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)</b>	<b>67,565</b>
Share of fossil sources in total energy consumption (%)	78%
<b>(7) Consumption from nuclear sources (MWh)</b>	<b>674</b>
Share of consumption from nuclear sources in total energy consumption (%)	0.8%
(8) Fuel consumption for renewable sources, including biomass (MWh)	12,158
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	6,669
(10) The consumption of self-generated non-fuel renewable energy (MWh)	0
<b>(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)</b>	<b>18,828</b>
Share of renewable sources in total energy consumption (%)	22%
<b>Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)</b>	<b>87,067</b>
Energy intensity (MWh/ Net revenue MEUR)	100

## E1-6 Gross Scopes 1, 2, 3 and total GHG emissions

In infrastructure construction, calculating the carbon footprint is important because it helps to identify the largest sources of emissions and find ways to reduce them. The carbon footprint refers to the total amount of greenhouse gas emissions over the life cycle of infrastructure construction. These GHG emissions are generated by the procurement of raw materials, the manufacture of materials, operation of the construction site, transport and waste management, for example.

GRK reports its GHG emissions in accordance with the ESRS standard and GHG protocol and the following standards: GHG Protocol Corporate Accounting and Reporting Standard and Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The reporting covers the Group's direct emissions (Scope 1), indirect energy emissions (Scope 2) and material Scope 3 categories in the value chain. The limitations of the calculations are based on the correspondence of the operations with GRK's business. The calculation takes into account CH<sub>4</sub> and N<sub>2</sub>O emissions as well as CO<sub>2</sub>. GRK's operations generate biogenic CO<sub>2</sub> emissions especially from renewable fuels. In the reporting year 2025, biogenic carbon emissions under Scope 1 amounted to 3,367 tonnes of CO<sub>2</sub>e. The biogenic carbon emissions has not been included in the reported Scope 1 emissions.

At GRK, we have already been calculating direct emissions from our own operations (Scope 1) and indirect emissions from energy use (Scope 2) since 2022. The Scope 1 emissions reported by GRK arise from the use of acquired fuel in work machines and vehicles. Scope 2 consists of emissions generated by GRK's purchased energy. In 2025, the carbon footprint of our own operations was 17,860 t CO<sub>2</sub>eq.

GRK reports the GHG intensity based on revenue (tCO<sub>2</sub>e/MEUR), based on to the consolidated financial statements Note 1. Revenue.

GRK's paving business is regulated under an emission trading scheme. In accordance with the ESRS, we separately report the share of emissions regulated under emission trading schemes. In the transition plan, we will also assess the impacts of these emissions on our climate goals. The Scope 2 market-based calculation takes into account GRK's purchases of renewable electricity verified with guarantees of origin. All purchased renewable electricity is covered by

guarantees of origin (100% of purchased renewable electricity) and included in electricity contracts. Purchased electricity covered by guarantees of origin accounted for 73% of GRK's total electricity consumption (taking into account the electricity purchased by GRK itself and the electricity consumption of leased premises). The location-based calculation is based on applicable national or local average emission factors and does not take into account GRK's own energy procurement choices. GRK does not have its own electricity production.

Scope 3 emissions describe the indirect emissions that are caused by GRK's operations but occur in our value chain. Based on the materiality analysis, we identified the categories that are relevant to our operations and included the following in the calculation:

- Category 1: Purchased goods and services
- Category 2: Capital goods
- Category 3: Fuel and energy-related activities (not included in Scope 1 or Scope 2)
- Category 4: Upstream transportation and distribution
- Category 5: Waste generated in operations
- Category 6: Business travel
- Category 7: Employee commuting

The other Scope 3 categories (categories 8-15) have been assessed to be irrelevant or not applicable in terms of operations and emissions during the reporting year and, therefore, the categories have not been taken into account in the Scope 3 calculation.

GRK reports the results of the carbon footprint calculation in the ESRS presentation format. Since a transition plan, including the base year and the definition of milestones, has not been prepared, GRK does not report this information. In addition, due to the development of calculations, GRK does not have comparable figures for 2024 retrospectively, so GRK does not report the 2024 emissions or the percentage change between 2025 and 2024 as part of the reporting for 2025. Reporting will be developed in connection with the preparation of the transition plan.

	Retrospective				Milestones and target years			
	Base year	2024	2025	(%) (2025–2024)	2025	2030	(2050)	Annual % target/base year
<b>Scope 1 GHG emissions</b>								
Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)	N/A	N/A	16,766	N/A	N/A	N/A	N/A	N/A
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	N/A	N/A	35%	N/A	N/A	N/A	N/A	N/A
<b>Scope 2 GHG emissions</b>								
Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	N/A	N/A	533	N/A	N/A	N/A	N/A	N/A
Gross market-based Scope 2 GHG emissions (tCO <sub>2</sub> eq)	N/A	N/A	1,094	N/A	N/A	N/A	N/A	N/A
<b>Significant scope 3 GHG emissions</b>								
<b>Total Gross indirect (Scope 3) GHG emissions (tCO<sub>2</sub>eq)</b>	N/A	N/A	316,350	N/A	N/A	N/A	N/A	N/A
(1) Purchased goods and services	N/A	N/A	280,858	N/A	N/A	N/A	N/A	N/A
(2) Capital goods	N/A	N/A	1,184	N/A	N/A	N/A	N/A	N/A
(3) Fuel and energy-related activities (not included in Scope 1 or Scope 2)	N/A	N/A	3,446	N/A	N/A	N/A	N/A	N/A
(4) Upstream transportation and distribution	N/A	N/A	29,362	N/A	N/A	N/A	N/A	N/A
(5) Waste generated in operations	N/A	N/A	91	N/A	N/A	N/A	N/A	N/A
(6) Business travel	N/A	N/A	730	N/A	N/A	N/A	N/A	N/A
(7) Employee commuting	N/A	N/A	678	N/A	N/A	N/A	N/A	N/A
(8) Upstream leased assets	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(9) Downstream transportation	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(10) Processing of sold products	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(11) Use of sold products	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(12) End-of-life treatment of sold products	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(13) Downstream leased assets	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(14) Franchising	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(15) Investments	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total GHG emissions</b>								
<b>Total GHG emissions (location-based) (tCO<sub>2</sub>eq)</b>	N/A	N/A	333,648	N/A	N/A	N/A	N/A	N/A
<b>Total GHG emissions (market-based) (tCO<sub>2</sub>eq)</b>	N/A	N/A	334,210	N/A	N/A	N/A	N/A	N/A

**GHG intensity per revenue**

	<b>2025</b>
GHG intensity based on revenue, Scopes 1,2, 3 (location-based), t CO <sub>2</sub> eq/MEUR	<b>382</b>
GHG intensity based on revenue, Scopes 1,2,3 (market-based), t CO <sub>2</sub> eq/MEUR	<b>383</b>

**Basis of preparation for the metrics**

The reported energy consumption data and GHG emissions include, where applicable, the operations and purchases of the GRK Group. Emissions are reported for all group companies over which GRK has control, and the reporting therefore covers the entire Group.

The energy consumption data reported by GRK includes the entire Group's consumption data. The reporting covers the material total consumption acquired for GRK's own operations and the total consumption of premises leased by GRK. Consumption data has been obtained from joint procurement service portals, purchase invoices or lessors. With regard to premises for which no data on actual consumption is available, consumption has been estimated based on floor area using the average consumption intensity per type of premises (kWh/m<sup>2</sup>).

Energy consumption is reported according to ESRS by energy source: fossil fuels (coal, oil, natural gas and other fossil sources), purchased fossil electricity and heat, nuclear-based sources and renewable sources. The report also presents the shares of fossil and renewable energy sources in total consumption. There was no data on the energy procurement of the leased premises in Sweden, Estonia and Finland, so electricity consumption data has been broken down into energy sources according to country-specific residual mixes.

The Group's GHG emissions have been calculated in accordance with the GHG protocol and the following standards: GHG Protocol Corporate Accounting and Reporting Standard and Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The limitations of the calculations are based on the correspondence of the operations with GRK's operations. In accordance with the GHG Protocol standards, GRK has included the direct GHG emissions from GRK's operations (Scope 1), indirect energy GHG emissions (Scope 2) and upstream and downstream value chain GHG emissions from the relevant Scope 3 categories in

the calculation and reporting.

Scope 1, direct GHG emissions, includes emissions arising from the use of fuels on construction sites and in equipment and vehicles. Scope 1 calculations are based on volume data collected from purchase invoices or the fuel supplier's reporting portal. The emission factors used are the up-to-date emission factors at the national level for each fuel type.

Scope 2, indirect energy GHG emissions, includes emissions arising from the consumption of heating and electricity purchased by GRK in different premises leased by GRK, such as offices, construction site huts and depots. Electricity and heat consumption data is obtained from energy joint procurement service portals, purchase invoices or the lessor. With regard to premises for which no data on actual consumption is available, consumption has been estimated on the basis of floor area using the average consumption intensity per type of premises (kWh/m<sup>2</sup>). GRK reports both location-based and market-based emissions for indirect energy consumption. The market-based assessment of energy emissions takes into account GRK's energy procurement choices, including supplier-specific choices and certified renewable electricity purchased with guarantees of origin and their supplier- and procurement-specific up-to-date emission factors. For the leased premises in Sweden, Estonia and Finland, no detailed information was available on the types of contracts and energy procurement, so the calculation was carried out in accordance with the GHG Protocol, taking into account the country-specific residual mix of energy production with regard to electricity consumption. The location-based assessment of energy emissions is based on up-to-date national emission factors.

GRK reports emissions from Scope 3 categories that are relevant to its operations. The materiality of the categories to be reported was identified in a materiality analysis prepared with key internal stakeholders, identifying the

emission categories that are relevant to operations and revenue. Emissions based on primary data accounted for 54% of total Scope 3 emissions.

The calculation of Scope 3.1 emissions covers the Group's material procurement and purchases for Finland, Sweden and Estonia. The calculation is based primarily on supplier specific data and secondarily on cost based emission factors derived from procurement data. In total, 67% of Scope 3.1 emissions are based on supplier specific purchasing data and 33% on cost based estimates. For Finland, emissions have been estimated for the most significant material groups and procurement based on supplier specific data, and the based on the assessment, all significant material categories are included in the calculation. Either product specific emission factors (EPD, EN 15804+A2) or standard based national emission factors have been used as emission factors for supplier specific assessments.

The emissions for subcontracting have been assessed in two phases. First, the shares of subcontracting whose emissions have been assessed separately (directly identified machine work and the corresponding share of manual labour) have been deducted from the total value. After this, a new 50/50 split has been made between machine work and manual work on the remaining subcontracting value. The machine-work portion of this value was assessed using a cost-based emission factor derived from the machine-work calculation, covering both the procurement and use-phase emissions of fuels. This method ensures that subcontracting emissions are included in the calculation comprehensively and without overlaps.

For Sweden, approximately 90% of material purchases have been assessed based on supplier-specific data, and the remaining purchases have been assessed using a cost-based emission factor derived from the Group's procurement data. For Estonia, Scope 3.1 emissions have been assessed entirely using an average cost based emission factor derived from procurement data.

Emissions related to insurance purchases have also been assessed using an average cost based factor. Purchases of professional services, office supplies, software and training have been excluded from the calculation due to their low financial and emissions relevance, and they are not estimated to have a material impact on the coverage of the calculation.

Scope 3.2 includes all investments made by GRK in long-term capital goods. The calculation also takes into account investments made in previous years that still have economic lifetime left. For the Scope 3.2 category, actual investment data has been collected from the Group's internal reporting, and up-to-date generic emission factors have been applied per equipment type.

Scope 3.3 emissions have been estimated on the basis of reported energy consumption and fuel consumption data (see E1-5). The emission factors used are up-to-date national emission factors published by Statistics Finland for different fuel and energy fractions. Scope 3.4 has been assessed on the basis of the material quantities collected for category 1 and the quantities reported for CSRD E5 using the Finnish Transport Infrastructure Agency's default transport distances and methods. The emission factors of the national emission database CO2data.fi for different modes of transport have been used as emission factors.

Scope 3.5 has been estimated based on the data reported in CSRS E5. The assessment includes all generated waste, i.e. collected from sites, offices and locations. The waste volumes of offices and locations are estimated based on the average amount of waste generated by office work. The amounts of waste generated at the sites are obtained on the basis of reported amounts from waste partners and separately from the sites. The emission factors of waste treatment methods are available in the national emission database (CO2data.fi).

The travel volumes used as the basis for the Scope 3.6 assessment have been collected on the basis of actual travel (kilometre allowances, airline tickets, train tickets). There is no information on the types of propulsion systems and models of the vehicles, so these are assumed on a statistical basis. DEFRA (DEFRA UK Government GHG Conversion Factors for Company Reporting (2025)) emission factors for different modes of transport have been used as emission factors.

Scope 3.7 emissions have been estimated through the number of people and average commutes and modes of transport (at the Finland level). DEFRA's emission factors for different modes of transport have been used as emission factors.

The Group is currently developing calculation methods for reporting Scope 3 biogenic emissions. The development work focuses in particular on how the share of biogenic carbon is separated from the emission factors, as well as improving

the availability of data and harmonising methods in accordance with the GHG protocol. The aim is to ensure comprehensive and comparable reporting in future reporting periods.

GRK does not report Scope 3 categories that are immaterial or not applicable for its operations. Category 8 (Upstream leased assets): GRK has leased premises, but GRK has operational control over these premises, and the emissions from them have been reported under Scope 2 in accordance with the GHG Protocol. Therefore, Category 8 has been assessed as not material. Category 9 (Downstream transportation and distribution): GRK does not sell products but delivers projects that are transferred to the client upon completion. As the company's business model is based on constructing infrastructure that becomes the property of the client, and no products are transported to end-customers, this category is assessed as immaterial. Category 10 (Processing of sold products): GRK does not sell products that would require further processing before use, and therefore this category is assessed as immaterial. Category 11 (Use of sold products): GRK does not sell products but delivers projects that are transferred to the client. GRK does not have control over how completed projects are used and does not have information on use-phase emissions. The contribution of Category 11 emissions to the overall value chain is considered negligible, and therefore the category is not reported. Category 12 (End-of-life treatment of sold products): GRK does not sell products but implements projects that are transferred to the client. GRK therefore has no products for which it would be responsible at end-of-life, and the category is assessed as immaterial. Category 13 (Downstream leased assets): GRK does not own or control leased assets that would be used by customers, and therefore this category is immaterial. Category 14 (Franchising): GRK has no franchising activities, and therefore this category is immaterial. Category 15 (Investments): GRK does not have significant investment activities, and therefore this category is assessed as immaterial.

GRK reports its energy intensity and carbon intensity in its sustainability report. Energy intensity refers to the company's energy consumption in relation to revenue (MWh/M€). Carbon intensity refers to the company's GHG emissions in relation to revenue (tCO<sub>2</sub>/M€). The IFRS revenue of the entire GRK Group used as the divider is presented in the consolidated financial statements Note 1. Revenue.

The intensity calculation covers the entire Group's activities, which fall under NACE code F.45.23 (infrastructure construction), and does not include any other activities.

# E2 Pollution of air, water and soil

## E2 Pollution of air, water and soil

Sub-topic	Sub-sub-topic	Type	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Pollution of air		Negative impact (potential)	Potential pollution of the air by dust or harmful substances generated by operations.	We see to the selection of appropriate tools and operating methods and anticipate potential dusty work phases by surveying them and drawing up a plan for managing the impacts. We also require the procedures from our subcontractors and suppliers.	x	x	x	medium-term and long-term
Pollution of soil and water		Negative impact (potential)	Potential pollution of water and soil as a result of operations.	We see to the selection of appropriate tools and operating methods and anticipate machine breakdowns with regular inspections and draw up a plan for managing the impacts. GRK's sites are equipped with the necessary control equipment. We also require the procedures from our subcontractors and suppliers.	x	x	x	medium-term and long-term
		Risk	The transition to a zero-polluting economy may require significant investments in the implementation of water treatment on construction sites or the processing of materials to reduce emissions.	We develop our preparedness for the transition to a non-polluting economy through proactive measures in procurement and our own operations. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x	x	medium-term
Substances of concern and substances of very high concern		Negative impact (actual)	Use of substances of concern and substances of very high concern in production.	We are looking for harmless substitute alternatives to previously used substances. We also require the procedures from our subcontractors and suppliers.	x	x	x	medium-term
		Negative impact (actual)	Exposure to substances of concern and substances of very high concern in production.	We ensure the appropriate use and storage of chemicals and materials, as well as protection against them.	x	x	x	medium-term
		Risk	Disposal of substances of concern and substances of very high concern may incur costs when the substances are replaced with less harmful alternatives.	We develop our preparedness for the transition to a non-polluting economy through proactive measures in procurement and our own operations. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x	x	medium-term

Impacts, risks and opportunities related to pollution

### SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

GRK has sought to identify the actual and potential impacts, risks and opportunities related to pollution at the upper level for the entire value chain. In GRK's own operations, the company's own construction sites were identified as essential.

GRK's success is based on and part of its strategy is its commitment to sustainable construction. GRK's strategic objective is "No significant environmental accidents", as described in section E2-3 Metrics and targets. Environmental management is integrated into the Group's operating culture and is guided by an ISO 14001:2015-certified environmental management system and the Group's environmental policy. The strategy emphasises proactive risk management and preparedness to prevent pollution, which supports GRK's goal of being a forerunner in sustainable construction. GRK does not report the total amount of pollutants in the air, water and soil (kg/tonne) for all of its operations. GRK's impacts and risks of pollution are related to individual incidents, not to continuous emission loads.

During the financial year 2025, none of the material risks related to pollution were realised or caused any financial effect. GRK's strategy emphasises proactive measures, such as the preparation of site-specific environmental plans, chemical management and taking risks into account in the contract phase. These measures reduce the risk of environmental damage and associated costs.

Air pollution due to dust and pollutants has been identified as potential negative impacts related to the pollution of air, water and soil. GRK anticipates dusty work phases as part of risk assessment, work planning and safety planning. Pollution of soil and water due to possible shortcomings in the management of chemicals and fuels was also identified as a potential negative impact. GRK prepares risk analyses and plans, carries out regular inspections, equips construction sites with pest control equipment and takes risks into account at the tender stage. GRK does not report disclosure requirement E2-4 Pollution of air, water and soil, as GRK's pollution-related impacts and risks primarily relate to individual exceptional incidents rather than to continuous emission loads.

The use of substances of concern and substances of very high concern in production and exposure to these substances were identified as potential negative

impacts. GRK looks for substitutes and ensures the safe use and storage of chemicals. GRK does not currently produce, distribute or export chemicals itself, but purchases and uses them in its operations. GRK does not report the quantities (kg) of substances of concern and substances of very high concern under disclosure requirement E2-5, as GRK's material impacts relate to storage, the safe use of chemicals, and exposure during use. GRK has assessed that the quantities are not material.

The transition to a non-polluting economy has been identified as a material risk, as the transition to a non-polluting economy may require significant investments to reduce the environmental impact of construction sites or to refine materials to lower emissions. GRK is developing its preparedness for this change through proactive measures in procurement and its own operations. We ensure that the risks and costs arising from the changes are taken into account at the tender stage.

GRK's business is linked to public infrastructure investments, where compliance with environmental permits is critical. Violation of the permit conditions could cause significant financial and reputational damage. The strategic goal of being a forerunner in sustainable construction requires GRK to operate openly and transparently with regard to permit obligations. In the financial year 2025, GRK's operations were in accordance with the permit conditions, and no violations of environmental permits were observed.

GRK's administration and management are committed to taking environmental issues into account in decision-making. This supports the strategic goal of integrating sustainability into business operations and governance.

#### E2-1 Policies related to pollution

GRK Group's policies related to pollution control are recorded in the Group's environmental policy, which is based on the ISO 14001:2015 certified environmental management system and national and international environmental legislation and regulations. The actors in the value chain are committed to the same operating principles through the Corporate Sustainability Requirements for Suppliers. The environmental policy and Corporate Sustainability Requirements together support the Group's strategic goal of "No significant environmental accidents".

The coverage, scope, implementation, responsibilities, consideration of stakeholders and availability of the environmental policy and Corporate Sustainability Requirements are described in section E1-2 of the report.

In the Environmental Policy and Corporate Sustainability Requirements, GRK takes into account the Group's own operations and the upstream and downstream value chain. The policies identify, assess, manage and, if necessary, remedy the material impacts, risks and opportunities related to pollution:

- Prevention and control of pollution of air, water and soil
- Substitution and minimisation of substances of concern and phasing out the use of substances of very high concern
- Avoiding significant investments resulting from the transition to a non-polluting economy

Pollutant control is carried out in accordance with the Group's environmental permit regulations, and monitoring is based on regulatory requirements and permit conditions. Measurements and reporting are carried out spot-wise in accordance with the permit conditions, and any deviations are handled with corrective measures.

#### E2-2 Actions and resources related to pollution

GRK implements practical measures to prevent and control pollution that support the Group's environmental policy and strategic objective "No significant environmental accidents". The measures are based on the ISO 14001:2015-certified environmental management system and country-specific guidelines on environmental issues at construction sites. The measures cover the management of air pollutants by instructing the reduction of emissions at construction sites, the prevention of emissions into waters and groundwater, especially in the vicinity of protected areas, the prevention of pollution of soil through the safe handling and storage of chemical oils and fuels, and the reduction of the use of substances of concern through appropriate procurement.

The country-specific environmental guidelines include GRK's key environmental instructions, which cover, for example, the cleanliness, order and safety of the site, site transport, material and energy efficiency, soil and water pollution, noise and

vibration, waste management and recycling, and the use and storage of chemicals and gases.

In the reporting year, a key measure was to review the country-specific environmental guidelines for construction sites in the induction at all construction sites. An environmental officer was appointed for each site to promote the division of responsibilities and quick reaction to deviations. Key measures during the reporting year also included the preparation of site-specific environmental plans before the start of work and the management of deviations in accordance with the Group's deviation reporting procedure. This promotes site-specific risk management and pollution prevention as well as rapid corrective action and, if necessary, reporting to the authorities. The HSEQ team is responsible for keeping the site environmental guidelines up to date and for the need to update them. All reported actions were short-term time horizon actions.

Before starting work, a site-specific environmental plan is drawn up for the site. Upon the start-up of a site, the environmental officer maps the site's environmental risks and plans the site operations, taking into account any risk areas identified in the survey. The environmental plan is prepared in accordance with the contract-specific instructions provided by the customer and GRK's site environmental guide. This work phase is important so that we can take into account the special characteristics of the site and prevent environmental damage.

The purpose of the environmental plan is to define concrete site-specific measures to ensure that environmental issues and the safety and health of employees are appropriately taken into account. It is the responsibility of the site's environmental officer to arrange the equipment and permits required for the work to be carried out on the site.

In the event of accidents and emergencies, our actions are guided by the country-specific environmental guidelines for construction sites. All employees are required to report any shortcomings and hazards they observe to the site's environmental officer and supervisor and to take immediate corrective measures in accordance with GRK's environmental guidelines, the safety data sheet for the substance concerned or the instructions of the rescue authorities. Any incidents observed at the site must always be reported to the site supervisors.

The supervisor must report the incident in accordance with GRK Group's incident reporting procedure.

As the expected result of these measures, GRK manages the risk of pollution of air, water and soil caused by its operations. The measures cover GRK's own activities and upstream and downstream partners in the value chain (subcontractors and suppliers) as well as all operating countries geographically. GRK has not had any approved or planned future measures related to the pollution of air, water and soil. The above-mentioned measures during the reporting year are part of GRK's typical business, and GRK will continue to implement the measures in the future. The funds required to implement preventive measures related to pollution are generated by business operations and there is no need to draw up a separate plan or reserve separate funds for them.

We also require our suppliers and subcontractors to report on any pollution and ensure reporting by inducting operators and by contractually requiring reporting. In 2025, we did not receive any information related to pollution from our suppliers.

#### Site cleanliness, order and safety

A weekly MVR/RRK/asphalt measurement is carried out at GRK's construction sites to assess the cleanliness and order of the construction site. In addition, environmental observations are recorded in the measurement as follows:

- Environmental impacts of work,
- Environmental impacts of equipment,
- Environmental impacts of storage and waste management,
- Other site-specific observations

#### Pollution of air, water and soil

Our operations must not cause deterioration or danger to the quality of the soil, waters or groundwater or harm to the environment or health. We carry out environmental quality measurements, such as water and soil sampling, if required by the client or the environmental permit for the area. If hazardous materials, invasive species or waste are released into the environment from our operations, we immediately take measures to prevent or remediate the pollution or hazard and

make the necessary notifications to the authorities. When working in groundwater areas and in the vicinity of nature reserves, special care is taken with chemicals, oils and fuels.

#### Plan for the management of the use of substances of concern and substances of very high concern

The use of chemicals and gases at GRK's sites is controlled by comprehensive safety and environmental instructions. An up-to-date list of the chemicals used is kept in a system that also contains safety data sheets and warning labels. Site-specific chemical lists supplement the Group's general list.

The chemical management system used complies with the legal requirements. Up-to-date material safety data sheets, chemical lists, safety cards and labels are available in the system. The automation of the software detects the presence of restricted substances and provides instructions on how to handle them safely. Chemical information can be entered using different methods, such as QR codes. The system also facilitates chemical risk and exposure scenario assessments.

GRK's chemical management system includes up-to-date regulations and archives the documents for 10 years. If necessary, a consulting service of chemical experts is also available.

The guidelines related to the use of chemicals are compiled in country-specific environmental instructions, which include instructions concerning the storage and handling of chemicals, exposure control, hazardous substances and the handling of chemical waste.

#### E2-3 Targets related to pollution

GRK's strategic target with regard to pollution is: No significant environmental accidents (entity-specific metric), which supports the Group's goal of being a forerunner in sustainable construction. The target also covers violating/exceeding the environmental permit obligations. The target is related to the Group's environmental policy and the ISO 14001:2015 certified environmental management system. The HSEQ team was responsible for preparing the target and it was approved by GRK's Board. The target is absolute and the number of

environmental damage accidents with a target level of zero is used as a metric. The target supports GRK's policies for the prevention and control of pollution described in section E2-1 of the report. The target set by GRK for itself is voluntary, i.e. the legislation does not require the target.

The monitoring of the target covers GRK's own operations and the value chain. The target applies to all of GRK's operating countries. The target is continuous and its achievement is evaluated annually. In personnel training, we focus on taking into account the special characteristics of the environment of work sites and sites, especially protected areas and groundwater areas.

The measurement is based on the Group's incident reporting system and sites' environmental observations, as well as ISO 14001:2015 certification. Customer requirements and instructions issued by the authorities have been taken into account in defining the targets.

In addition to the number of environmental accidents, GRK reports the number of environmental observations and environmental deviations as a voluntary metric, and the results are compared with the set target. Observations and incident reporting prevent more serious incidents, and we use the records to develop our operations.

- Environmental accident = significant environmental incident, causes permanent damage
- Environmental deviation = remediable, e.g. broken hose that spills hydraulic oil into the soil, but the soil can be cleaned
- Environmental observation = observation, nothing has happened yet

	2025
Environmental observations	187
Environmental deviations	58
Environmental accidents	0

The targets related to pollution concern all key areas of pollution control. The achievement of the target is monitored numerically based on the number of environmental accidents, deviations and observations. We also comply with environmental permits, registrations and other requirements. In 2025, measurements were prepared in accordance with the permit conditions, with no overruns of the permit conditions observed. The use of substances of concern and substances of very high concern is regulated by the ISO 14001:2015 environmental management system as well as country-specific environmental guidelines. Accordingly, chemicals are stored at GRK's worksites and offices only to the extent necessary for operational purposes.

The targets have been set by the GRK Group Management Team, and stakeholders have not participated in the setting of targets related to pollution.

#### Basis of preparation for the metrics

At GRK Group, environmental observations, deviations and accidents are recorded in an electronic system, with the recording carried out at the site via an application or directly in the system. Alternatively, they are reported directly to the HSEQ team via email.

# E5 Resource use and circular economy

## E5 Resource use and circular economy

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on the business model, strategy, value chain and decision-making and related actions	Upstream	Own operations	Downstream	Time horizon
Resource inflows		Negative impact (potential & actual)	Significant use of natural resources reduces their sufficiency and environmental status.	We use as little energy as possible and replace raw materials and materials with renewable and recycled alternatives where possible. Our circular economy business has expanded and supports the circular economy of materials generated in construction, enabling their intermediate storage and processing. We bring our expertise to the attention of customers and work in cooperation with our suppliers to develop common requirements.	x	x	x	short-term and medium-term
		Risk	Dependency on fossil raw materials and materials creates a cost risk as the market becomes lower-carbon.	We seek and test opportunities to increase the use of renewable and biofuels. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x		medium-term
		Risk	Circular economy requirements increase efficiency and reporting requirements and require the reuse of materials. Compliance can increase investment costs.	We develop our preparedness for circular economy requirements through proactive measures in procurement and our own operations. We support the promotion of circular economy requirements with our extensive network of sites, which makes it possible to increase the efficiency of reuse of materials. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x	x	medium-term
		Opportunity	Developing resource efficiency and integrating circular economy thinking into operations can reduce material costs and increase the efficiency of work.	We use our circular economy expertise and expand successful operating methods in the further development of operations. We develop site-specific material procurement and monitoring. We develop industry practices by offering our circular economy services to all of our customers and partners. Opportunity to improve our success in tenders with circular economy requirements.	x	x		long-term
Waste		Negative impact (potential & actual)	Our operations generate a significant amount of waste.	We are developing site-specific sorting and recycling rates. We strive to minimise material waste. We set common goals with our suppliers.	x	x		short-term, medium-term and long-term
		Risk	Circular economy requirements increase efficiency and reporting requirements and require the reuse of materials. Compliance can increase investment costs.	We develop our preparedness for circular economy requirements through proactive measures in procurement and our own operations. We support the promotion of circular economy requirements with our extensive network of sites, which makes it possible to increase the efficiency of reuse of materials. We ensure that the risks and costs of the changes are taken into account already at the tender stage.	x	x	x	medium-term

Impacts, risks and opportunities related to resource use and circular economy.

### SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Significant use of natural resources was identified as a negative impact, which reduces their adequacy. Infrastructure construction requires significant amounts of raw materials and materials, such as concrete and cement, steel and rebar, aggregates and bitumen as the raw material for asphalt.

GRK's operations depend on the availability and pricing of these resources. The functioning and costs of the logistics of raw materials and materials also has a significant impact on the operations of construction sites. Construction also generates a significant amount of waste, and this has been identified as a negative impact. In line with our strategy, we aim to reduce energy consumption and replace raw materials with secondary and recycled alternatives..

Dependency on fossil raw materials has been identified as a material risk, as cost pressures will increase as the market becomes less carbon intensive. In addition, increased circularity requirements have been identified as a risk as it brings efficiency and reporting requirements and requires reuse of materials, which can increase investment costs. We prepare for these risks through proactive measures in procurement and our own operations and by leveraging GRK's comprehensive network of circular economy sites.

The development of resource efficiency and the integration of a circular economy mindset into operations were identified as opportunities, which can reduce material costs and increase work efficiency. We use our circular economy expertise and expand successful operating methods in the further development of operations. We develop site-specific material procurement and monitoring and offer our circular economy services to customers and partners, which can improve our success in competitive bidding where circular economy requirements are emphasised.

During the financial year 2025, none of the identified material risks related to the use of resources and the circular economy were realised or caused a financial effect.

### E5-1 Policies related to resource use and circular economy

The policies related to resource use and circular economy are recorded in GRK Group's environmental policy, which is based on the ISO 14001:2015-certified environmental management system. The key content of environmental policy is reducing energy use and moving towards renewable energy sources. In addition, replacing raw materials with renewable and recycled alternatives whenever feasible, promoting the circular economy through the reuse and recycling of materials and providing circular economy services to customers are included in the environmental policy. The environmental policy also addresses minimising waste through site-specific sorting and cooperation in the value chain to develop common requirements with clients and suppliers.

Requirements are set for suppliers through the Group's Corporate Sustainability Requirements for Suppliers, and cooperation with the value chain takes place to promote sustainable solutions. GRK's procurement policies are discussed in section G1-2 on supplier cooperation.

The construction industry is a major source of emissions, and a large part of the emissions are generated by the use of raw materials, materials, and energy. The aim is to use as little energy as possible and to replace raw materials and materials with renewable and recycled alternatives where possible. The environmental policy covers both phasing out primary resources and increasing the use of recycled resources. We also promote circular economy thinking and resource efficiency through the Green Deal commitment, which includes targets for reducing the consumption of natural resources and increasing recycling.

GRK's environmental policy supports the Group's strategy, which aims to promote sustainable construction, improve resource efficiency and achieve net zero Scope 1 and 2 emissions by 2035. The environmental policy guides procurement, the use of materials and waste management in all business operations.

In the double materiality analysis, we have identified material impacts, risks and opportunities. The significant use of natural resources and the amount of waste generated by operations were identified as negative impacts, the dependency on fossil raw materials and cost pressures as the market becomes less carbon-

intensive and increased circular economy requirements as risks, and developing resource efficiency and integrate a circular economy mindset into operations as an opportunity. The policies in accordance with the environmental policy related to the use of resources and the generation of waste are implemented in practice in site planning and orientation as well as through country-specific environmental guidelines. For suppliers and contractors, the policies are included in the contract terms and conditions and procurement policies through the Corporate Sustainability Requirements for Suppliers.

The coverage, scope, implementation, responsibilities, consideration of stakeholders and availability of the environmental policy and Corporate Sustainability Requirements for Suppliers are described in section E1-2 of the report.

The implementation of the environmental policy with regard to the use of resources and the circular economy is monitored through procurement and site reporting. Key metrics include the tonnes of secondary materials used and the recovery rate of waste. The results are reported quarterly to the management and annually as part of the sustainability report.

### E5-2 Actions and resources in relation to resource use and circular economy

During the reporting year, GRK implemented several measures to reduce the use of resources and promote the circular economy. Key measures included increasing the use of recycled materials in infrastructure construction projects and expanding circular economy services. In 2025, we used secondary materials in our operations, such as crushed concrete, ash and slag, and used a significant amount of recycled asphalt in the paving business.

GRK's strategic intent is to be a forerunner in sustainable infrastructure construction. This goal is supported by our environmental technology business, which is divided into circular economy and bioproduct businesses. Circular economy consists of a total of 19 sites in Finland. In 2025, we expanded our circular economy business network by seven new regions through an acquisition. These locations will become part of the circular economy business once the

environmental permits for the areas have been updated. A wide range of waste materials, such as construction waste, ash, slag and concrete, are received and processed into higher-quality materials at the circular economy locations. In addition, some of the circular economy locations use recycled materials in construction themselves. The expected result of these measures is growth in the use of recycled materials and an improvement in the recovery rate of waste, which reduces the consumption of natural resources and reduces environmental impacts.

At GRK's construction sites, the use of resources and the circular economy were promoted in the reporting year through practical measures, such as ordering only the necessary amount of raw materials and material resources to minimise waste, crushing concrete structures to be demolished on-site, transporting them to processing stations or utilising demolished concrete structures on-site. The circular economy and efficient use of resources were also promoted by utilising other recycled materials at GRK's construction sites and by transporting surplus soil from construction sites to nearby construction sites, for example. At construction sites, waste is sorted and transported to licensed treatment sites, and the amount of mixed waste is minimised. Hazardous waste is handled appropriately.

The bioproduct business is part of GRK's environmental technology unit and it supports the goals of the circular economy by upgrading waste and side streams into new products. The bioproduct business consists of two plants. In the reporting year, biomaterials such as sawmill side streams and construction waste timber were used as raw materials for the biochar plant. Biochar is used, for example, to improve the water and nutrient retention capacity of growth media, as a filter material and for carbon sequestration. One of the two plants produces raw material for energy production, pellets. Pellets are produced from clean by-products of the forest industry, such as sawdust, cutter chips and dry wood chips. Pellets are used for heating, and they are suitable for both large thermal power plants and private customers. The production of pellets utilises the surplus energy generated in the production of biochar, which improves energy efficiency. The expected result of these measures is to increase the value of waste and recycled raw materials and to increase the supply of low-carbon products. In 2025,

the bioproduct business was minor while the development of the plant was still in progress.

The planned future measures are related to GRK's strategic goals of promoting the circular economy and increasing the environmental business unit's revenue. No detailed plan for promoting the strategic targets had been drawn up in the reporting year. GRK is also committed to preparing guidelines for low-carbon design solutions by 2026, which will support construction sites in offering alternative circular economy solutions to customers. The expected outcome of the measures to be implemented is to meet circular economy requirements, improve cost efficiency and strengthen competitiveness in tenders where circular economy solutions are key. More detailed future targets are described in section E5-3 of the report.

The scope of the measures covers GRK's business operations in all operating countries and the upstream and downstream value chain, in particular procurement, site operations and waste management. The time horizon varies from short-term actions, such as implementing guidelines and expanding the network of sites, to long-term targets, such as tripling the use of recycled materials by 2035. The resources required to implement the measures are covered through business operations, and separate provisions have not been considered necessary. Progress is monitored annually with metrics such as the tonnage of recycled materials used and the recovery rate of waste, and the results are reported to management and as part of the sustainability report.

### E5-3 Targets related to resource use and circular economy

#### Resource use

GRK has set targets for promoting the circular economy that support the Group's strategy and policies and correspond to the impacts, risks and opportunities identified in the materiality analysis. The targets relate in particular to resource inflows through reducing the use of natural resources and increasing the use of recycled materials, as well as resource outflows through improving the recovery rate of waste and refining side streams into new products. In addition, our target of only using workwear made from recycled materials is related to indirect inflows.

All of the targets are voluntary, but they support national and EU circular economy and climate goals. The achievement of the targets supports GRK's strategic goals: improving resource efficiency, promoting circular economy and achieving net zero by 2035.

GRK's target with regard to supply chain emissions (Scope 3) is to increase the use of recycled materials and grow the environmental technology business. In the resource-intensive infrastructure construction sector, improving resource efficiency and incorporating solutions that promote the circular economy are key to achieving the target.

GRK is committed to the voluntary Circular Economy Green Deal, in which our absolute targets are as follows:

- In construction projects, we use reused materials, recycled materials and reused building products to replace the use of primary materials: We aim to triple our annual use of recycled materials to 1.5 million tonnes by 2035 from the baseline value (487,000 tonnes) of the base year 2023. The milestone is to reach 1.0 million tonnes by 2030. We will also set targets for increasing recycled materials' share of the total consumption of natural stone.
- We increase the value of waste and recycled raw materials by processing them into new products, such as biochar and recycled fertilisers: We aim to triple the annual revenue of the environmental technology unit from the baseline value (EUR 10 million per year) of the base year 2024 by 2035. The milestone is to double the revenue by 2030. The starting point is that more than 95% of the raw materials procured are waste or recycled materials.

The goal of increasing the use of secondary materials is related to resource inflows, as it reduces the use of primary raw materials and increases the share of recycled materials in the total consumption of building products and natural aggregates. The target is related to the preparation for reuse level of the waste hierarchy. The achievement of the targets supports the fulfilment of circular economy requirements and reduces environmental impacts. We have been calculating GRK's use of secondary materials since 2018. The use of recycled and secondary materials has increased annually. The monitoring is based on the

weighing data of the locations and the reporting of the construction sites, and the metric used is the tonnes of recycled materials used per year. In 2025, the use of secondary materials was 882,045 tonnes, which is in line with the milestone (1.0 million tonnes by 2030). The measures have yielded results particularly in the management of material flows and the recovery of side streams. No significant changes have been reported, but the risks are related to the supply of secondary materials. In 2025, the figure includes all country companies and businesses. In 2018–2024, secondary materials were only used at GRK’s sites in Finland. In 2025, secondary materials were also used in construction in Sweden. The largest categories of secondary materials are crushed concrete, ash, slag, gravel and tyres. In addition, we use a significant amount of recycled asphalt in our paving business.

The environmental technology unit’s revenue target is related to resource outflows, as it uses waste and side streams in the production of new products and reduces the amount of waste directed to disposal. The use of waste and recycled materials supports circular economy principles and reduces environmental impacts. The target is related to the recycling and, in part, preparation for reuse levels of the waste hierarchy. The targets are monitored based on financial reporting and production volumes. The environmental technology unit’s revenue was EUR 13 million, which indicates a positive development towards the 2030 milestone (EUR 20 million). No significant changes have been reported, but the potential risks are related to raw material availability and market demand.

In addition, we have set an absolute target for GRK to only use workwear made from recycled materials (100% of clothing includes recycled materials) from 2028 (excluding workwear for which no recycled material solutions are available) compared to the base year 2025 baseline, when no workwear made from recycled materials was in use (0% of clothing included recycled materials). This target is related to indirect inflows, as it concerns procurement that is not directly related to construction, but affects the demand for recycled materials and the sustainability of the value chain. The target is related to the recycling level of the waste hierarchy.

Achieving this target requires developing supplier cooperation and monitoring the market. No milestone has been set for the use of workwear made from recycled materials.

The targets related to the use of resources apply to the entire Group in all of our operating countries and also to the upstream value chain, including subcontractors and suppliers. The targets are based on industry best practices and the requirements of the Green Deal commitment. The targets have been set using, for example, stakeholder work in preparing the Green Deal commitment and the requirements set by customers. The targets have been set by the HSEQ team and approved by the Group Management Team. The targets have been set on the assumption that there are sufficient recycled materials on the market and that technological solutions develop as planned. The achievement of the targets is monitored annually, and the results are reported to management and as part of the sustainability report. Progress is assessed in relation to the set milestones and significant changes are analysed.

#### Waste generation

At GRK, we sort the waste generated efficiently and appropriately and aim for a high recovery rate of waste. In terms of waste management, our relative target is a recovery rate of more than 70% for 2026, which includes the share of waste recovered in energy production and recovery for earthworks. The baseline value is the recovery rate for 2025, i.e. 94%. With regard to the recycling rate, GRK separately monitors the amount of recycled waste without incineration and recovery for earthworks, but no target has been set for the recycling rate. These targets are related to resource outflows as they guide waste management according to the waste hierarchy towards reuse and recycling. The monitoring of the waste recovery rate is based on the electronic reporting systems of waste management companies.

#### Waste\* recovery rate target (excluding soil materials and aggregates)

	2026	2035
(*includes material used for energy production)	> 70%	> 90%

The targets related to the generation of waste apply to the entire Group. The targets have been defined using industry best practices and the requirements of the Green Deal commitment. Monitoring takes place annually, and the results are reported quarterly to management and annually as part of the sustainability report. The target was set by the HSEQ team and approved by GRK’s Board. The achievement of the targets is assessed using metrics such as the tonnes of recycled materials used, recycling rate, recovery rate and the environmental technology unit’s revenue. The waste recovery rate was 94%. The recycling rate excluding incineration and recovery for earthworks was 55%, but no numerical target has been set for this.

Achieving these targets supports GRK’s strategic targets: improving resource efficiency, promoting the circular economy and achieving net zero by 2035. Any changes to the targets, metrics or their calculation methods are reported transparently and their impact on comparability is assessed as part of annual reporting.

#### E5-4 Resource inflows

Infrastructure construction is material-intensive, and we use significant amounts of raw materials and materials in our operations, such as concrete, cement, steel, wood, aggregates and bitumen. The availability and pricing of these materials has a significant impact on the implementation and costs of projects. We have assessed the key and most material raw material and material flows used by GRK in 2025, i.e. concrete and steel products, aggregates, bitumen and wood. The share of recycled raw materials and biological materials in the materials used was 0.0%.

### Materials used in the production of GRK's products and services

Material	Amount of material (t)
Steel	29,905
Cement and ready-mixed concrete	381,652
Prefabricated concrete and other concrete products	27,191
Bitumen	36,066
Asphalt	40,913
Aggregate	6,461,836
Wood	1,378

As a forerunner in sustainable construction, we want to develop the production and use of low-emission materials and increase the share of recycled materials in our operations. In 2025, we produced crushed concrete, recycled fertilisers, biochar and pellets. Production volumes were low in 2025 due to the launch of business operations or development measures at the installations. With regard to renewable biological materials, GRK has no practice of using certification systems (e.g. PEFC, FSC) or cascading, in which biomaterials are primarily used for the highest-value applications before energy use. Managing material flows and promoting recycling are key measures for achieving net zero in our own operations by 2035. GRK will develop its procurement and reporting principles related to the procurement and reporting of biomaterials and the recycling content of materials.

In addition to materials, we need machinery in our work. GRK manages more than 650 machine units and the figure does not include trailers, small machines or measuring devices. The fleet consists of the following units:

- Vehicles (trucks, vans, cars), approx. 500
- Machines, approximately 200
  - Civil engineering and road construction: excavators, compressors, generators, road rollers and wheel loaders
  - Railway construction: excavators, wheel loaders, rail-bound tractors, supporting machines, locomotives and wagons
  - Paving: asphalt pavers, asphalt rollers, emulsion sprayers and milling machines
  - Excavation, reinforcement and drill piling equipment (excavators, feeders)
- Asphalt stations, 3 fixed stations and 3 mobile stations

### E5-5 Waste

Our operations mainly generate waste from construction sites, and waste management is a key part of promoting the circular economy. Efficient waste sorting on construction sites reduces the amount of unrecycled waste and, at the same time, the costs of operations. The total amount of waste generated during the reporting period is presented in the table in this section. No radioactive waste has been generated in GRK's operations.

Waste is sorted at construction sites and directed to licensed treatment sites. The construction sites strive to minimise the amount of mixed waste and to direct materials primarily for reuse and recycling. Demolished concrete structures are crushed on site or directed to processing stations, and the steels separated from the concrete are used as secondary raw material. Hazardous waste, such as asbestos waste, is directed to licensed final disposal areas.

The types of waste treatment are reported according to the waste hierarchy: preparation for reuse, recycling, other recovery activities (e.g. incineration and earthworks) and disposal (landfill and other disposal). The recovery rate includes the recovery of waste directed to incineration and earthworks, while the recycling rate measures the amount of recycled waste excluding incineration and earthworks.

	Amount (tonnes) 2025
<b>Total amount of waste generated</b>	<b>10,707</b>
<b>Total amount of waste diverted from disposal</b>	<b>9,533</b>
<i>Total quantity of hazardous waste</i>	29
1) Preparation for reuse	9
2) Recycling	7
3) Other recovery activities	14
<i>Total amount of non-hazardous waste</i>	9,503
1) Preparation for reuse	225
2) Recycling	5,689
3) Other recovery activities	3,589
<b>Total amount of waste directed to disposal</b>	<b>1,175</b>
<i>Amount of waste directed to disposal by type of operation</i>	1,175
1) Incineration	482
2) Landfill	505
3) Other disposal operations	188
<i>Total amount of hazardous waste (share of the total amount directed to disposal)</i>	39
1) Incineration	8
2) Landfill	0
3) Other disposal operations	31
<i>Total amount of non-hazardous waste (share of the total amount directed to disposal)</i>	1,136
1) Incineration	474
2) Landfill	504
3) Other disposal operations	157
<b>Total amount of non-recycled waste</b>	<b>4,778</b>
Percentage of non-recycled waste	44.6%

### Basis of preparation for the metrics

GRK reports the most relevant raw material and material categories with regard to resource inflows. The reported material quantities have been estimated using both supplier-specific data and average cost-based estimates derived from procurement data. For Finland, the materials have been assessed based on supplier-specific information. For Sweden, approximately 90% of material categories have been assessed using supplier-specific data, with the remainder estimated using a cost-based method applying material intensity factors derived from procurement data. For Estonia, all material flows have been assessed using a cost-based approach based on procurement data and the corresponding average material intensity factors. The estimation methods have been selected according to the country-specific data coverage and reliability, and supplier-specific information is always used as the primary source whenever available.

Direct measurements are used as the accounting method for resource use and waste generation, and the data is collected from electronic systems. The quantitative data for recycled materials is based on the weighing data of the sites and the reporting of the sites. The key assumptions are related to material weights and standardised conversion factors.

The waste data is based on the electronic reporting tools of the waste management companies used by GRK and the reporting of the sites. The calculation method is based on direct measurements and data is collected from the suppliers' systems. The total amount of waste includes waste directed to treatment from construction sites and offices. The total amount of waste is presented divided separately into hazardous and non-hazardous waste. The reporting covers GRK's business operations in Finland, Sweden and Estonia.

The amount of office waste has been estimated based on assumptions and is based on the number of office employees. The default value for the average amount of office waste is 200 kg of waste per full-time equivalent. The figure is based on the European Commission's Best Environmental Management Practices (BEMP) published as part of the EU's EMAS (Eco-Management and Audit Scheme), which presents less than 200 kg of waste per person-year as a benchmark of excellence for office environments.

The use of resources and the generation of waste do not include environmental technology activities. For the circular economy, resource use data is included in the entity-specific metric "use of recycled materials".

## SOCIAL INFORMATION

# S1 Own workforce

## S1 S1 Own workforce

\*Identified as a human rights impact

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Working conditions	Employment security*	Positive impact (actual)	Stable employment and long-term employment relationships support the well-being of the personnel. Providing jobs in the current economic situation and in several cities is a socially responsible achievement.	In addition to sharing knowledge and skills and training our existing personnel, GRK has been able to recruit new personnel on a continuous basis. In accordance with the HR policy, GRK aims to tie permanent and long-term employment relationships. In addition, GRK invests in the well-being of its personnel to engage employees and maintains a strong employer brand to recruit new professionals.		x		short-term and medium-term
		Negative impact (actual)	Seasonal fluctuations typical of infrastructure construction and changes in market conditions can cause uncertainty in employment.	Personnel planning, competence development and internal mobility support employment despite seasonal fluctuations. GRK invests in the commitment of personnel and the continuous development of competence in order to promote employment security.		x		short-term and medium-term
	Health and safety*	Negative impact (actual)	In the construction industry, the physical stress of work tasks and varying and challenging working conditions can impair the health of employees. The work often involves the use of heavy machinery and equipment, which increases noise exposure, as well as the handling of various materials that may involve exposure to harmful substances. In addition, high temperatures and unergonomic working positions during work phases can increase the strain on the musculoskeletal system.	GRK's operations are guided by an operating system certified in accordance with the ISO 45001 standard, including the occupational health and safety policy and safety plans, among others. The health of employees is taken into account from the start of the employment relationship, and every new GRK employee undergoes a pre-employment examination during the trial period. The employee examination includes a physical fitness test by an occupational physiotherapist and an examination by an occupational health physician. In addition, regular age-related examinations are carried out on GRK's personnel. Health examinations are organised every 1–3 years, particularly in the rail construction business. An exposure register is maintained for persons working with hazardous substances and they must undergo exposure controls annually. In order to minimise the impacts on safety, GRK uses several measures, such as internal audits, safety observations, weekly site meeting and safety briefing practices as well as orientation and training. All near misses and potential accidents are reported and investigated to promote a safe working environment.		x		short-term, medium-term and long-term
Negative impact (actual)			The demanding work tasks in the construction sector and the operating environment in the infrastructure sector increase the risk of work-related accidents and fatal accidents.			x		short-term, medium-term and long-term
Risk		Violation of workplace health and safety regulations poses a risk to compliance and operating expenses. Additional operating expenses may arise in the form of audits or legal expenses, for example.			x		short-term and medium-term	

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Equal treatment and equal opportunities for all	Diversity	Negative impact (actual)	The construction industry is characterised by a low proportion of women among the company's employees and senior management.	The dominance of men typical of the industry is also reflected in GRK's personnel figures. At GRK, diversity and equality efforts and equal pay are managed through the human rights and HR policies. These policies are supported by, for example, diversity training and training for recruiting managers, documented recruitment practices and the whistleblowing channel. In addition, the Group's gender distribution is monitored annually at both Group and country company level.		x		short-term and medium-term
	Gender equality, equal pay for equal work	Negative impact (actual)	The low proportion of women among the company's employees and senior management, which is typical of the construction industry, may weaken gender equality and the possibility of equal pay.			x		short-term and medium-term
		Risk	Lack of gender equality or wage discrimination may pose a risk related to compliance with laws and regulations. This can increase operating expenses in the form of audits, reporting periods, salary comparisons or legal costs, for instance.	At GRK, pay is always determined according to the valid local collective agreement, the job grade and the employee's experience. Other factors, such as gender, do not affect recruitment or pay, and diversity and equality are always taken into account starting from recruitment. GRK's HR carries out salary comparisons and regularly reviews the employment situation of employees with varying working hours. These measures aim to ensure that everyone is paid equally and that the form of the employment contract always corresponds to the actual workload.		x		short-term and medium-term
	Training and skills development	Negative impact (actual)	The seasonality and project-based work typical of the industry pose a challenge for the uniform organisation of training and development discussions for all employees.	GRK's personnel work in a wide range of tasks and have different educational backgrounds. These have a direct impact on the regularity of the employee's training. In addition, development discussions are unfortunately not yet as common among construction employees as among white-collar employees, or the discussions have not been reported. GRK ensures the competence of its own personnel through the training plan, orientation, online training and mentoring. In addition, active cooperation with educational institutions and the provision of internships contribute to ensuring the continuity of competence.		x		short-term and medium-term
		Positive impact (actual)	Continuous and systematic development of personnel competence ensures the sufficient competence required for the implementation of the strategy, provides competitive advantage and motivates personnel for career development.			x		short-term and medium-term
	Measures against violence and harassment at the workplace	Negative impact (potential)	Discrimination and harassment at the workplace can impair the employees' well-being, feeling of safety and working atmosphere. Such situations can lead to reduced work ability, sickness absences and personnel turnover.	GRK has zero tolerance for inappropriate treatment, discrimination and harassment. Employees are trained in ethical practices through, for example, training in the principles of fair operations and diversity. Each employee must complete the Principles of Fair Operations training annually. Supervisors and management are required to intervene in inappropriate treatment if it occurs. In addition, the occupational safety committee and shop stewards offer low-threshold support. In the annual personnel survey, one can provide anonymous feedback on any harassment. The confidential whistleblowing channel, on the other hand, allows anonymous reporting of grievances for all stakeholders.		x		short-term and medium-term

Impacts, risks and opportunities related to own workforce

### SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

GRK's personnel are a key part of the strategy, which is reflected in the values, the strategic intent, choices and practical measures. GRK's success is based on professional personnel and an entrepreneurial culture that we want to nurture. GRK has business operations and employees in Finland, Sweden and Estonia. The company's strategy emphasises fostering cooperation and coherence between different operating countries and businesses.

The seasonality of the infrastructure sector's business model has been identified as a potential negative impact for GRK, which may cause uncertainty in employment for our personnel. On the other hand, in line with the strategy, GRK wants to retain the best professionals and has been able to offer long-term employment relationships despite the socially challenging economic situation, which creates a positive impact and supports the well-being of the personnel.

The impacts of occupational health and safety are emphasised in the infrastructure industry. The physical load and varying working conditions in the infrastructure sector have been identified as a negative impact that can impair the health of employees. Demanding work tasks also involve a risk of work-related accidents. Failure to comply with occupational health and safety regulations can result in a compliance risk that can result in additional costs for the business, for example in the form of audits or legal processes. GRK's strategic intent of being a forerunner in sustainable construction also means a safe working environment that does not harm anyone.

Diversity and equality are key aspects related to own personnel for GRK. The dominance of men typical of the infrastructure sector is also reflected in the proportion of women in GRK's personnel, which may weaken gender equality and opportunities for equal pay. Shortcomings in gender equality or wage discrimination has been identified as a compliance risk, which can increase business costs. These impacts have been taken into account in GRK's strategy through a strong corporate culture and the competitiveness of the personnel, as well as in the company's values, which emphasise shared responsibility.

Training and skills development are both a challenge and an opportunity for

GRK. The seasonality and project-based work typical of the business model pose a challenge in organising training and development discussions evenly for all employees. On the other hand, the continuous and systematic development of personnel has been identified as a positive impact, ensuring the competence level required for implementing GRK's strategy, providing competitive advantage and motivating personnel for career development. The training and skills of the personnel has been taken into account in GRK's strategic intent, choices and methods as well as identified megatrends affecting the industry.

Measures against violence or harassment at the workplace have been identified as a potential negative impact related to GRK's own personnel. The impact is seen to be related to the project-based and geographically dispersed operations of the business model, which may result in undetected incidents. Any inappropriate treatment impairs the employees' well-being, feeling of safety and working atmosphere. Such situations may lead to a decrease in work ability, sickness absences or personnel turnover, which would have a direct impact on GRK's business. This impact has been taken into account in GRK's strategic target of the most competitive team, which is built on the mental and physical well-being and competence of employees.

The risks and opportunities related to GRK's own personnel are due to GRK's impacts on its own workforce and GRK's dependency on competent and thriving personnel. Impacts related to employment security, occupational safety, equality, diversity and skills development can create both risks and opportunities. These factors play a key role in the implementation of GRK's strategy, as the well-being, competence and commitment of the personnel has a direct impact on project success, customer satisfaction and competitiveness. GRK's strategy identifies the personnel-related impacts and risks, and these are actively managed through measures such as safety measures, personnel training, equality efforts and the development of well-being at work. Thus, the personnel-related impacts are not only a result of the strategy but also guide its development.

All employees who are directly employed by GRK are considered to be part of the Group's own workforce and included in the scope of reporting. In addition to employees, the definition of own workforce includes temporary agency labour for

non-employees. However, the use of temporary agency labour at GRK is very low, so no information on non-employees has been included as part of the company's own workforce.

Based on the double materiality analysis, we have identified that the negative impacts and risks related to health and safety as well as the regularity of training are emphasised especially for people who work in physically demanding site tasks. Health and safety impacts and risks are related to the varying conditions of the site environment. The negative impact of training and skills development, on the other hand, stems from the seasonality and project-based work typical of the industry.

The negative impacts and risks related to gender equality and equal pay are linked to the low proportion of women in the workforce, typical of the construction industry. The dominance of men in the industry is also reflected in GRK's personnel figures, and any potential impacts and risks therefore concern the minority gender to a greater extent.

Despite the challenges, the negative impacts on the well-being of GRK's personnel are not extensive but mainly related to risks typical of the construction operating environment, such as accidents.

The positive impacts related to the company's own personnel on employment security and training and skills development identified in the double materiality analysis benefit all of GRK's own employees, regardless of their position. GRK sees positive impacts as the foundation for achieving the strategic targets, such as profitable growth and the most competitive team, which are built on the well-being of the personnel. In addition, professional personnel provide GRK with a competitive advantage and facilitate the transfer of competence within the organisation.

GRK's business and operating countries do not expose GRK to a significant risk of forced labour or the use of child labour.

The impacts of the transition plan related to climate change mitigation on the company's own workforce have not yet been taken into account, as the transition plan has not yet been implemented. The schedule and content of the transition plan are discussed in section E1-1.

## S1-1 Policies related to own workforce

GRK's personnel-related policies are guided by GRK's values and the Principles of Fair Operations (ethical business policies). The same Principles of Fair Operations are followed in all of GRK Group's country companies, and the principles apply equally to all of GRK's personnel, regardless of their position.

GRK's Principles of Fair Operations are based on the legislation and regulations issued by the authorities that are complied with at each time as well as GRK's values:

- We take responsibility
- We are not afraid
- We do not waste time
- We do not just go to work
- We succeed together

In addition to GRK's values and Principles of Fair Operations, the realisation of human rights is supported by Group-level policies, such as:

- HR policy
- Human rights policy
- Safety, quality and environmental policy
- Risk management policy

All of GRK's policies are based on legislation, collective agreements and GRK's own policies. The necessary policies are drawn up and discussed in cooperation with employee representatives before they are published. The policies are communicated to supervisors and employees, and all policies are available in GRK's internal communication channel. Key stakeholders, such as members of the Management Team, have the opportunity to express their opinions on draft policies and practices before they are published. The member of the Management Team responsible for each policy is responsible for monitoring, reviewing and updating the implementation of the policies at least annually. An open dialogue between management, employees and other stakeholders aims to ensure that all perspectives are taken into account in the policy process.

The realisation of human rights in GRK's operations is guided by the Group's human rights policy, which has been prepared in accordance with the following internationally recognised instruments and human rights and working life standards:

- United Nations Universal Declaration of Human Rights
- UN Global Compact
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

The personnel form the foundation of GRK's strategy, and the company's success is believed to be built on cooperation, taking diverse views into account and working together. GRK's human rights policy describes the company's commitment to respecting human rights, treating everyone equally and recognising everyone's right to work. The human rights policy states that forced labour, the use of child labour, trafficking in human beings, discrimination, violence and harassment in any form are not tolerated in the Group's operations. In accordance with the policy, GRK always complies with local labour law and industry-specific collective agreements, and working hours, wages, holidays and other terms and conditions of employment are determined accordingly.

GRK's HR policy defines the policies regarding recruitment, allocation of work, training and career advancement. The HR policy describes the policies related to the conclusion and form of employment contracts and manages the impacts related to employment security. GRK's recruitment process is open and transparent, and particular emphasis is placed on an attitude that is fearless of work, cooperation skills and enthusiasm to develop as a professional in the selection of employees. The primary aim is to conclude employment contracts valid until further notice. The form of remuneration of the personnel is determined on a task-specific and consistent basis. Fixed-term employment relationships are concluded for the needs of individual sites, for the performance of a specific job or for a specific project, for substitution, traineeship or seasonal work. Part-time employment contracts are only concluded if it is known in advance that the workload of the person will be less than the workload of a full-time employee.

Full-time employment contracts are only converted into part-time contracts at the person's own request, for example, due to studying, part-time retirement or partial disability pension. In the event of major changes in life, well-being at work and work-life balance are supported for salaried employees, for example, through flexible working times and the possibility to move between companies on a case-by-case basis. In accordance with the HR policy, employment relationships are terminated only on the basis of legislation, agreements and collective agreements. When the employment relationship ends due to production-related and financial reasons, GRK as the employer strives to promote the person's employment.

The HR policy also addresses the identified impacts related to training and skills development. All members of the personnel have the equal right and obligation to participate in statutory training in accordance with their job description to ensure GRK's operating conditions. Qualitative targets and programmes related to skills development are defined annually and recorded in GRK's training plan.

GRK's safety policy defines GRK's policies related to health and safety and manages the related impacts and risks. GRK's safety activities are based on an operating system certified in accordance with the international ISO 45001:2018 standard, on the basis of which operations promoting the safety of employees are implemented, managed and developed. Every member of GRK's personnel falls within the scope of this operating system.

At GRK, workplace safety and health also means equal and fair treatment of all employees. The treatment of employees must not be influenced in any way by the person's gender, transgender identity or expression, ethnic background, political opinion, national origin, social origin, age, sexual orientation, religion or any creed or disability. These policies are guided in particular by GRK's human rights, HR and safety policy and the Principles of Fair Operations. The policies are also included as part of the training on GRK's Principles of Fair Operations and diversity (DEI). This aims to prevent discrimination and promote understanding of diversity and inclusion.

Risk management is an integral part of the operating system and is implemented at the project, process and personnel level at GRK. Risk assessments are updated annually, and they cover the identified personnel risks. The policies for risk management are documented in the Group's risk management policy.

	Main contents	Related IROs	Stakeholder benefits and availability	Third-party standards or initiatives committed to	Responsibility for implementing the policy	Approved by
<b>Principles of Fair Operations</b>	GRK's ethical guidelines are aggregated into the Principles of Fair Operations, which include the Group's common Code of Conduct. The Principles of Fair Operations are based on legislation, official regulations and GRK's values, based on which concrete procedures have been built for GRK's management and employees for different scenarios. The Principles of Fair Operations encapsulate how the company acts in relation to other people, customers, partners, the environment, assets and society.	Employment security, health and safety, diversity, gender equality, equal pay for equal work, education and skills development, prevention of harassment and violence	The principles take into account the best interests of employees, emphasising employees' safety, fair treatment and human rights. In addition, they include requirements from authorities and society, such as the prevention of the grey economy, environmental protection and compliance with sanctions, while protecting the integrity of the industry. The Principles of Fair Operations are available on GRK's website and in the company's internal communication channel.		Chief Legal Officer	Board
<b>HR policy</b>	GRK's HR policy guides the Group's operations to promote the well-being, competence and equity of personnel. The policy covers recruitment, well-being at work, competence development, remuneration, equality and cooperation. The aim is to provide a safe, fair and motivating working environment where everyone can develop and thrive. The policy is based on the Group's values and supports strategic HR management in all operating countries.	Employment security, health and safety, diversity, gender equality, equal pay for equal work, education and skills development, prevention of harassment and violence	The HR policy takes into account the interests of the company's own personnel, placing particular emphasis on equal treatment, remuneration, rewarding, recruitment and resource allocation. In addition, well-being at work, occupational safety and orientation as well as competence development have been taken into account when preparing the policy. The HR policy is available in the company's internal communication channel.	European Union Wage Transparency Directive	HR Director	Board
<b>Human rights policy</b>	GRK's human rights policy outlines the Group's commitment to respecting and promoting internationally recognised human rights. The policy covers employee rights, a safe and healthy working environment, diversity and non-discrimination, environmental responsibility and responsible supply chain management.	Employment security, health and safety, diversity, gender equality, equal pay for equal work, prevention of harassment and violence	GRK's human rights policy safeguards the fundamental rights and interests of employees by emphasising the employees' right to a safe, healthy and non-discriminatory working environment and respect for the freedom of association and other fundamental principles of working life. The policy also requires GRK's partners to commit to the same human rights principles throughout the supply chain and to respect the rights and traditions of local communities. The human rights policy is available on GRK's website and in the company's internal communication channel.	The human rights policy outlines GRK's commitment to respect and promote human rights as defined in national and international legislation, standards, declarations and treaties, such as the UN Universal Declaration of Human Rights, the UN Global Compact, the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work and the OECD's Guidelines for Multinational Enterprises.	HR Director	Board

	Main contents	Related IROs	Stakeholder benefits and availability	Third-party standards or initiatives committed to	Responsibility for implementing the policy	Approved by
<b>Safety, quality and environmental policy</b>	GRK Group's safety, quality and environmental policy guides the Group's responsible operations. The aim is to ensure a safe and healthy working environment, provide high-quality and flawless services and operate in accordance with the principles of sustainable development and respect for the environment. Operations are guided by common procedures, compliance with legislation and goal-oriented development in all areas. The key to achieving the goals is the management's example, the commitment of the personnel, continuous development and cooperation with stakeholders.	Health and safety, gender equality, prevention of harassment and violence	The safety, quality and environmental policy takes into account the interests of personnel, subcontractors and those working on sites through safety, occupational health and equal treatment. In addition, the policy takes into account the expectations of customers, authorities and society by guiding GRK's operations to offer high-quality and ecological solutions and by cooperating with industry operators and authorities. The safety, quality and environmental policy is available in the company's internal communication channel and the policy is also described on GRK's website.	Quality ISO 9001:2015, Occupational health and safety ISO 45001:2018, Environment ISO 14001:2015	Chief Risk Officer	Board
<b>Risk management policy</b>	GRK Group's risk management policy guides the Group's operations in identifying, assessing and managing risks. The aim is to ensure the achievement of strategic and financial goals and the continuity of operations. Risk management is part of day-to-day management and decision-making and covers strategic, operational, financial, damage and compliance risks.	Employment security, health and safety, diversity, gender equality, equal pay for equal work, education and skills development, prevention of harassment and violence	The risk management policy takes into account the personnel's interests by managing operational and accident risks related to employees, such as personnel and safety risks, and by providing guidelines for risk management throughout the organisation. In addition, the policy takes into account external stakeholders, such as subcontractors, customers, authorities and users of built infrastructure, for example, in the management of damage, operational and compliance risks. The risk management policy is available in the company's internal communication channel and the policy is described on GRK's website.	The COSO and ERM framework is followed where applicable. In addition, the ISO 31000 standard and the Securities Market Association's recommendations for listed companies.	Chief Risk Officer	Board

*Policies related to own personnel*

GRK has no separate Group-level policy regarding inclusion or positive actions for people from groups at particular risk of vulnerability. However, equity and inclusion are described in the equality and non-discrimination plans and employment principles, which are part of GRK Suomi Oy's work community development plan, prepared in accordance with the requirements set out in the collective agreements for employers.

GRK's policies are implemented through training on diversity and Principles of Fair Operations, among others, to prevent and mitigate discrimination. Any suspicions of discrimination are addressed promptly and systematically at GRK. The HR Director is responsible for investigating all incidents that arise without delay, involving the necessary parties in the processing. If necessary, an external occupational health representative is also involved in the investigation. During the process, all parties are regularly communicated to and kept informed of the progress of the matter.

GRK's policies have been incorporated into recruitment, orientation and training to ensure that they are effectively implemented throughout the organisation. In addition, the policies are communicated to the personnel through the company's internal communication channels. At the same time, it is ensured that all employees have equal opportunities for a safe and healthy working environment and skills development. GRK's general policies for engaging with its own personnel are described in section S1-2 of the report. GRK's measures for the remediation of human rights impacts are described in section S1-3 of the report.

### S1-2 Processes for engaging with own workforce and workers' representatives about impacts

The operating principles defined in GRK's HR policy include promoting a good work community, cooperation and working atmosphere through open discussion between the employer and different personnel groups. In accordance with the policy, the operating principles include regular meetings and continuous contact with employee representatives. Business management, operational management and HR are each responsible for direct engagement with the personnel and personnel representatives in their respective areas of responsibility. The operating

method of open dialogue is required of all GRK personnel. GRK's HR Director is responsible for implementing engagement with the personnel representatives and embedding it in GRK's operating methods together with the rest of HR.

GRK Group is an organised employer, and the Finnish company is a member of Infra ry. All of GRK's country companies comply with the applicable local labour laws and collective agreements as well as local agreements. Cooperation is carried out in accordance with the legislation of each country, and all local agreements are drawn up in accordance with GRK Group's ethical policies. Local collective agreements are renewed through regular collective bargaining between the employers' union and the employee union. The aim of the cooperation is to develop the company's operations and the influence of GRK's personnel. In addition, the activities offer GRK the opportunity to gain an understanding of the views of its own personnel.

Occupational health and safety are taken into account at GRK as part of daily work. GRK has a country-specific occupational health and safety committee or a group comprised of occupational health and safety personnel whose key task is to promote proactive occupational health and safety and to make development proposals concerning safety and occupational health to the employer. In addition, the occupational health and safety committee monitors the implementation of the occupational health and safety action programme and occupational health care and presents development proposals for these. The occupational health and safety committee convenes as necessary, but at least four times a year. All GRK employees can contact the members of the occupational health and safety committee directly if they wish. In addition, cooperation is carried out with occupation-specific shop stewards at the country company in Finland.

The Group conducts a personnel survey annually in cooperation with the pension insurance company. The results of the survey can be disaggregated if the number of respondents is sufficient at the level of business units, business areas or locations. The personnel survey investigates, among other things, satisfaction with supervisory work and management, the meaningfulness, clarity and balance of work, psychological safety and diversity. In addition to these themes, the personnel survey offers employees the opportunity to share their experiences

of engaging with the employer. GRK evaluates the success of the engagement and the necessary changes based on the survey. Everyone is guaranteed the opportunity to respond to the personnel survey, and the language options for the survey are defined company-specifically. Technical support is also provided for responding, if necessary. HR is responsible for the implementation of the personnel survey, and it is the responsibility of senior management, with the support of HR, to ensure that the results are processed and taken into account in decision-making. The results are reviewed at different organisational levels and with shop stewards. Managers are trained in processing the results and teams are offered support in preparing development actions. Based on the results, the work communities agree on development measures, the implementation of which is monitored in meetings in accordance with GRK's management system. Personnel information sessions are organised for GRK's personnel quarterly and as otherwise required. The events are held in Finnish and English, and the personnel have the opportunity to ask questions and discuss current issues directly with management.

Exit interviews are used as one method of consulting the personnel at GRK Suomi Oy. The exit interviews are used to collect feedback from employees who are about to terminate their employment with GRK. The purpose is to understand the reasons why the employee has decided to leave and to gain insights and experiences regarding working at GRK. The feedback received helps to identify potential targets that will be used to develop GRK's operations. The exit interviews are carried out by either GRK's employment relationship expert or the employee's supervisor. The discussion is completely confidential.

In addition to these processes, managers are encouraged to engage in continuous dialogue with their team members. In addition, GRK regularly communicates to the personnel about current issues through daily communication channels, such as GRK's internal communication channel and email.

GRK has identified that persons belonging to the minority gender, who are women as is typical of the construction industry, are most vulnerable to the negative impacts and risks related to gender equality and equal pay. At GRK, the operating methods for engagement affect all of our personnel, and the views of all personnel groups are surveyed equally. Any discrimination is addressed without delay.

### S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns

GRK has Group-wide processes in place for handling material impacts on its own personnel and for taking corrective actions. When identifying negative impacts related to its own personnel, GRK's general operating method is to handle all situations and incidents equally and promptly. The effectiveness of the corrective actions is assessed by monitoring the recurrence of negative impacts and the feedback received from the proceedings, among other things. The number of accidents, lost working days, accident frequency and sickness absences as a percentage of the annual working time are assessed as a metric of health and safety incidents. The effectiveness of other corrective measures is monitored, for example, by means of the employee survey and the number of reports received through the whistleblowing channel. In addition, if complaints were to arise about the processing of whistleblower reports, this would indicate the ineffectiveness of corrective actions.

An important measure for the remediation of impacts is the training of GRK personnel. In addition to health and safety training, employees are trained in GRK's ethical operating principles through training on the Principles of Fair Operations. Every GRK employee must complete and renew training on the Principles of Fair Operations annually. Furthermore, all operating principles and policies relevant to GRK's employees are documented and available in GRK's internal communication channel. The internal communication channel also contains information and instructions on how to use the whistleblowing channel.

GRK's HSEQ team is responsible for monitoring health and safety-related incidents, near misses and safety observations. A reporting tool is used as a

monitoring tool and a summary of the incidents, and their underlying reasons is compiled monthly. The summary is sent to all employees in the Group and printed out for the sites so that it is possible to learn from the incidents. In order to prevent and remediate negative health effects, GRK offers occupational health services and comprehensive health coverage to its employees.

All GRK employees are covered by occupational health care. In addition, GRK Group uses an alternative work model as a corrective action. Alternative work refers to temporary work other than the person's usual work (or participation in training), which the person is able to perform without endangering their health after being prevented from their ordinary work due to an accident or ill health. The aim of alternative work is to reduce disturbances at construction sites, sickness absences and the resulting costs, and to provide opportunities for personnel to adopt new working methods and skills through training. The model also aims to minimise the consequences of the negative impact of work on the employee's work.

GRK has several channels through which employees can raise their concerns. In the first instance, employees are instructed to contact their supervisor or local HR, especially in matters related to employment or the work community. GRK's management, HR and supervisors are obligated to intervene if they become aware of direct or indirect inappropriate treatment, discrimination or harassment. Employees are encouraged to report any discrimination or suspicion thereof immediately to the supervisor and the HR Director. The availability of engagement channels for the company's own personnel is supported by communicating about them in the company's internal communication channels and by presenting them in connection with the Group induction. The procedures for investigating inappropriate behaviour are the same for all employees.

Concerns can also be reported identified or anonymously through GRK's whistleblowing channel. The whistleblowing channel in place is a third-party mechanism. All reports received will be handled confidentially, and GRK guarantees that the whistleblower will not incur any consequences related to the employment relationship. Instructions related to the whistleblowing channel and the whistleblowing process are available to all GRK personnel in the company's internal communication channel. In addition, the whistleblowing channel is

described in GRK's Principles on Fair Operations and related training as well as in anti-corruption principles. GRK Group's Chief Legal Officer is responsible for monitoring the whistleblowing channel and processing reports. GRK does not separately assess the employees' awareness of the whistleblowing channel, but the number of reports received serves as an indicator of the employees' trust and the effectiveness of the whistleblowing channel. GRK's whistleblowing channel and processing of reports as well as the protection of whistleblowers are described in more detail in section G1-1.

GRK Suomi Oy also has shop steward activities that offer a low-threshold opportunity to discuss matters related to occupational health and safety and working conditions. All employees of the country company in Finland have the right to contact the shop stewards if they experience grievances or safety-related concerns in their work.

The annual personnel survey is a key tool for GRK to monitor possible negative impacts and a channel through which the personnel can raise their concerns. The survey includes an open-ended question asking whether the employee has experienced harassment during the past year. In connection with the question, the respondent also has the opportunity to describe the situation in more detail. In addition, the survey presents the following statements, and by monitoring the number of positive responses, GRK assesses the employees' confidence in the available channels for raising concerns and needs:

- "All employees are treated equally regardless of age, ethnic background, gender, physical characteristics, etc."
- "I can talk about problems at the workplace without fear of consequences"
- "Managers act in accordance with the organisation's values and culture"
- "I trust my immediate supervisor"
- "There is a caring atmosphere at my workplace"

The availability of the communication channels to the personnel is supported by actively communicating about the activities in the company's internal communication channels and in connection with induction training. In addition,

availability is also supported by providing technical support for contacts to those persons whose work tasks do not otherwise require a computer. The aim of these measures is to ensure that all personnel are aware of the channels, regardless of their work task.

## S1-4 Taking action on material impacts on own workforce

### Employment security

As an employer, GRK primarily aims to conclude full-time employment contracts valid until further notice. In order to manage the impacts, GRK's HR and the business directors assess the implementation of the terms of non-guaranteed working hours contracts regarding working hours. In addition, HR conducts salary comparisons for GRK's own personnel and regularly reviews the employment situation of employees working with non-guaranteed working hours. These measures were also implemented during the reporting period, which aimed to ensure that remuneration is more equal and that the form of the employment contract always corresponds to the actual workload.

GRK aims primarily to avoid having to lay off or dismiss its own personnel on production-related or financial grounds. If layoffs have to be implemented, HR will monitor the number of people who have received a layoff notification and those who have been laid off with separately maintained resource monitoring. In 2025, change negotiations concerning the personnel of GRK Suomi Oy's rail construction business commenced on 12 September 2025 and were concluded as agreed with the personnel representatives on 30 September 2025. In accordance with the decision made together with the personnel representatives, all persons affected by the change negotiations were offered change security services as a measure to mitigate the negative impact. Change security services were made available to all employees who were dismissed due to financial and production-related reasons, regardless of the duration of the employment relationship.

In addition to the measures offered by GRK, the employment security of GRK's employees is strengthened by the social security coverage of all employees in the event of life changes, either through public systems or benefits offered by GRK. Such life changes include ill health, unemployment, parental leave, retirement and occupational injury.

### Health and safety

GRK's employees work in a wide range of jobs, which means that the occupational health and safety risks vary. Health and safety measures are based on an operating system certified in accordance with the international ISO 45001:2018 standard, GRK's safety policy and occupational health and safety action plans. Employees are committed to compliance with the policies at all levels of the organisation by clearly communicating their responsibilities and obligations regarding occupational health and safety. Supervisors are responsible for orientation according to the guidelines and operating models, their implementation as part of operations and the monitoring and supervision of their implementation.

The management of GRK Group and the country companies creates the conditions for a positive and open safety culture and taking safety into account in all operations. The management communicates the importance of safety and the consideration of human factors in all safety-related processes through its own example and behaviour. In addition, the management discusses the development needs identified in the operations and develops the operations together with GRK's personnel.

In our day-to-day work, we ensure that safety is part of the professional skills of every GRK employee through training and active safety discussion. Before starting work, each employee is inducted into safety practices, taking into account both GRK's safety principles and site-specific factors. All employees also receive the necessary work instruction in the use of machines and equipment. Everyone is encouraged to actively discuss safety and health as part of daily interactions, for example in the form of a weekly safety briefing.

GRK Group implements a zero-accident approach in its operations, which means that all accidents, near misses and incidents are investigated and reported, also taking into account the human factors behind the events. The event is communicated throughout the organisation and the information obtained from it is used in the development of operations. Instructions for recording safety observations are provided at all GRK sites and locations. Observations can be recorded on a mobile device or by notifying the site management. Making safety observations promotes anticipation and thus improves the productivity, quality and safety level of work. Safety observations can also be made about positive

observations, making it possible to share good practices throughout the GRK Group.

The GRK HSEQ team is responsible for reviewing safety observations and reporting them on a monthly basis. In addition to safety observations, the monthly safety review includes topical safety issues related to, for example, seasonal conditions or other safety issues. The review also includes information on the safety events and situation during the past month. The review is sent to the entire Group by e-mail, and it is also printed out at the construction sites for everyone to see. In addition to these measures, GRK's safety work is supported by regular internal audits in all country companies. The audits include process and support function audits and project audits.

In order to lower the accident frequency and achieve the related strategic target, a model was introduced in the GRK Group during the past year in which, after an accident that led to sickness absence, the accident and its reasons are discussed together with the CEO.

GRK offers its employees comprehensive health insurance. In 2025, group accident insurance also valid during leisure time was introduced at GRK Suomi Oy. In addition, occupational health care is provided to all GRK personnel regardless of the country or place of work. This ensures that every employee has equal opportunities to receive the support and care they need in all operating environments.

In 2025 one of the implemented measures to manage negative impacts and risks at GRK was the Group-wide safety campaign "Kaverin puolesta" launched in 2025. The purpose of the safety campaign is to stimulate thoughts about the importance of safety in our work and to find small and large ways to improve safety in every GRK employee. The main idea of the campaign is to pay attention not only to one's own safety, but to the safety of the entire work crew. The campaign summarises the most important safety observations of recent years from GRK's construction sites into seven safety theses. During the campaign, material was published in GRK's internal communications channel for discussing current safety issues at construction sites and sites. However, the most important thing is that safety and health are addressed in one way or another.

Unfortunately, a GRK partner's employee suffered a fatality during the reporting

period. The person in question was a non-employee who worked at a GRK site. GRK assisted the authorities in investigating the accident and also conducted its own investigation into the causes leading to the accident. The worker had been inducted into their duties and had completed the necessary training. Following the incident, immediate measures were launched to prevent similar incidents. GRK started an investigation into the possibility of installing reversing cameras and automatic stop sensors in similar machines. In addition, the review of the operating instructions for machines as part of the induction and training of workers was specified further. After the incident, crisis assistance was offered to the team and crisis assistance was also made available to all other GRK personnel.

GRK Group is a substance-free workplace, and we operate in accordance with the principles of the substance abuse programme. Working under the influence of alcohol or other intoxicants on a construction site or in an office is strictly prohibited (zero tolerance 0.00‰). Activities are guided by GRK Group's substance abuse programme, which has been prepared in cooperation with occupational health care. As a control measure, GRK regularly carries out voluntary breathalyser tests, and from 2025 onwards, all new employees underwent drug testing. Information on drug testing is provided in advance in the recruitment advertisements, in the GRK website section aimed at job applicants, during the application process and before the employee's pre-employment examination.

### Occupational health

The health of employees is taken into account from the start of the employment relationship, and every new GRK employee undergoes a pre-employment examination during the trial period. In addition, the pre-employment examination includes a physical fitness test by an occupational physiotherapist and an examination by an occupational health physician for employees taking on site duties.

In addition, regular age-related examinations are carried out on GRK's personnel. Regular health examinations are particularly important for those working in rail construction, and they are organised every 1–3 years for GRK's employees. An exposure register is maintained for persons working with hazardous substances and they must undergo exposure controls annually.

As an employer, GRK aims to reduce sickness absence and prevent prolonged absence through tailored work and an early support model. In addition, extensive occupational health care services are available to the personnel. The tailored work model is applied particularly for the prevention of sickness absence caused by accidents and to prevent the effects of various work-related stress factors. In accordance with the early support model, GRK as the employer monitors the work ability of the personnel, and when sickness absences exceed the agreed threshold, the HR system sends an automatic notification to the supervisor. Any observed deviations are addressed at the earliest possible stage by discussing the matter together with a HR representative, the supervisor and, on a case-by-case basis, occupational health care in a well-being at work discussion and work ability negotiation.

In addition to the above-mentioned measures and comprehensive occupational health care, GRK supports employees' well-being at work and coping through measures such as well-being mentoring, exercise and culture benefit and flexible working times.

### Rewarding safety

As a measure for implementing successful and proactive safety work, GRK Suomi Oy has a model for rewarding safety in place. Rewarding applies to all GRK Suomi Oy's production site personnel, salaried employees and employees employed by GRK Group in a permanent employment relationship. With regard to the rail construction, paving and the environmental services, rewarding is also applied to permanent fixed-term production salaried employees and employees whose employment relationship continues throughout the calendar year or working season.

Each project and site is responsible for the reporting of the information to be taken into account in the rewarding. Accidents, near misses and incidents are recorded in the systems used by GRK Group, and any safety observations are also taken into account in the rewarding. The HSEQ team is responsible for monitoring rewarding. The guidelines related to rewarding safety are reviewed and, if necessary, updated annually. A similar practice has not yet been implemented in GRK's country companies in Sweden or Estonia.

### Training and skills development

GRK aims to ensure the competence of its own personnel through orientation, online training and mentoring. In addition, active cooperation with educational institutions and the provision of internships contribute to ensuring the continuity of competence in the Group.

Some of GRK's identified training needs are caused by external factors, such as statutory or client-required card training, competence, degree, certificate and qualification requirements related to various work tasks, and competence requirements set by quality management and operating systems. In addition to the above, training needs arise from GRK's internal factors, such as the strategy, vision and values, as well as operating culture and the transfer of tacit knowledge. As a rule, the training required for working in tasks are made possible for all those who need training. In addition, GRK invests in training that expands, maintains and develops the professional skills and work ability of its entire personnel. Correctly timed, dimensioned and targeted personnel training contributes to creating the basis for profitable business.

In recent years, GRK's training has focused in particular on railway construction driver training, increasing the competence of railway maintenance personnel and supervisor training that covers the entire site organisation. In addition to these, GRK invested in Group-wide information security training in 2025 and launched AI training. The aim of AI training is to meet current working life standards and ensure the safe and responsible use of AI in the Group. The training includes general training for all employees and targeted training for employees who actively use AI in their work. In the future, the training will be gradually expanded to cover an increasingly large proportion of GRK's personnel. In 2026, the plan is to start training in performance-based project management at GRK Suomi Oy and GRK Eesti AS. At GRK Sverige AB, such training has been organised since 2022.

In addition to training, the transfer of knowledge within the company is supported by GRK's long-established and proven "master and apprentice" approach. Mentoring based on this approach has been shown to be an effective method that, among other things, supports the change of work tasks and roles, increases productivity and improves the transfer of tacit knowledge. The programme and training are scalable and applicable to all levels of the company's

operations and master–apprentice pairs are rewarded annually at GRK for successful training.

In order to manage the negative impact related to training and skills development, supervisors strive to have regular review discussions with all employees, where the employee and the supervisor can both give an assessment of the past period. The employee has the opportunity to talk about well-being, coping and any safety considerations. This ensures that GRK as the employer is able to support its employees in different stages of life in the best possible way.

### Diversity and equity

GRK has zero tolerance for inappropriate treatment, discrimination and harassment. Equity and diversity are steered through the human rights and anti-discrimination policy as well as the equality and non-discrimination plan. The outcomes are monitored annually. All GRK employees have equal opportunities for training, career development and well-being at work benefits. As a measure to ensure the implementation of ethical operations and human rights, GRK has training on the Principles of Fair Operations and diversity (DEI). Diversity training began in the Group during 2025. Training is offered to the Group's entire personnel, and the completion rate is monitored through the HR system.

Diversity and equity are always ensured starting from the recruitment situation, and recruiting supervisors are trained to take diversity into account through recruiting supervisor training at GRK Suomi Oy. At GRK Sverige AB and GRK Eesti AS, recruitment is mainly carried out by the HR departments of the country companies, so no similar training has yet been arranged.

In addition to preventive and maintenance measures, GRK has a confidential whistleblowing channel through which employees can report inappropriate treatment or human rights violations. The whistleblowing channel is described in more detail in section G1-1.

### Effectiveness of actions

The effectiveness of actions related to health and safety, diversity and competence promotion is monitored using the metrics specified for them. GRK uses several metrics to monitor the health and safety situation in order to obtain the broadest

picture possible. Accident frequency, sickness absences and employee satisfaction are monitored regularly throughout GRK Group. In addition, the monthly HSEQ reviews, among other things, support the assessment of the effectiveness of GRK's actions. Internal and external audits and incident analysis are used to take immediate corrective action and to support management decision-making and development work.

The effectiveness of actions regarding job security, gender equality, equal pay for work of equal value and measures to prevent violence and harassment at the workplace are surveyed in the annual personnel survey, the results of which are analysed in order to plan development measures. Moreover, any reports received through the whistleblowing channel are processed appropriately. In addition, the coverage of actions related to training and competence development as well as diversity is monitored using training registers. The results are reported annually, and development measures are planned in cooperation with the personnel.

GRK aims to ensure that its own practices do not cause or contribute to material negative impacts on personnel. For this purpose, GRK uses the Principles of Fair Operations, uniform safety, environmental, non-discrimination and equality practices as well as clear personnel processes and occupational health and well-being at work models. All sites must prepare a site-specific risk assessment and an environmental and safety plan before starting work, and these are reviewed on a regular basis. In addition, GRK monitors the personnel's workload, working hours, absences and the results of the personnel survey in order to detect potential risks. If tensions arise between ensuring the well-being or safety of personnel and business pressures, such as a tight schedule or a shortage of resources, GRK's operating method is to prioritise safety and the well-being of employees. If necessary, work is interrupted and resources are added to projects, or work methods are changed to reduce risks.

### S1-5 Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities

GRK has not yet set measurable result-oriented targets related to some of the impacts identified during the reporting period, such as employment security, gender equality, equal pay for work of equal value, training and skills development,

and measures to prevent violence and harassment at the workplace.

The effectiveness of the policies and actions in relation to material sustainability-related impacts, risks and opportunities is nevertheless monitored by means such as the employee survey, employee satisfaction, reports received through the whistleblowing channel and the qualitative metrics defined in the training plan. The policies and actions are described in more detail in sections S1-1 and S1-4 of the report. Progress in these areas is monitored annually compared to the previous year. The setting of targets will be reviewed again in 2026.

GRK Group's strategic targets and metrics are set annually by GRK's Management Team and approved by the Board. Engaging with the company's own personnel concerning the targets mainly takes place directly through the internal communication channel and personnel information sessions.

The metrics set for the targets are regularly monitored and any corrective actions are taken based on them. The targets apply throughout the Group, in all three countries in which GRK operates. GRK's stakeholders have not participated directly in setting the targets presented below.

### Health and safety

GRK's targets include maintaining and strengthening the safety culture and well-being at work. The aim is to expand safety observations so that observations are made at each site, and the total number of observations would exceed 2,500 by 2025. The target for the number of safety observations is set annually, and progress is monitored based on the previous year's result. In 2025, 2,388 safety observations were made, which meant that the target was not achieved.

In 2025, the aim was to reduce the number of lost working days among our own personnel by 50 per cent from the previous year's level, when the corresponding figure was 113 days. During the reporting year, the number of lost working days was 103, which is a decrease from the previous year, but the target of a 50% decrease has not yet been achieved.

In addition, the target for 2025 was to reduce the frequency of sickness-related accidents to less than seven for both our own employees and subcontractors. The baseline was the accident frequency rate in 2024, 7.9. At the end of the reporting period, the accident frequency rate was 7.3, which was a positive development, but

still slightly below target. The long-term target of reducing the accident frequency to less than five by 2028 has also been set.

The continuous target related to sickness-related absences is that their share of the annual working hours should not exceed 2.5 per cent. Progress is measured on the basis of the previous year's figure, when the sickness absence rate was 2.3%. In 2025, the Group's sickness absence rate was 2.3 per cent, remaining at the same level, which means that the target was achieved.

### Diversity

GRK requires equal and non-discriminatory treatment regardless of position, gender, skin colour or other personal beliefs. The Group's ongoing target is to keep the number of incidents of serious discrimination and human rights violations at zero. The number of incidents has been monitored since 2022. In 2025, no serious incidents of discrimination or human rights violations were observed at GRK Group. In potential incidents, all channels through which GRK could have become aware of the incidents have been taken into account. These include the whistleblowing channel, the employee survey and other channels, such as email. The policies for achieving the target have been recorded as part of GRK's equality plan and the work community development plan. In addition, the principles are communicated to the personnel through, for example, the Principles of Fair Operations and diversity training.

In 2025, a target related to the employee completion rate was set for the first time for training in Principles of Fair Operations. The target is to achieve 100% training coverage across the Group. At the end of 2025, 64% of GRK's personnel had completed the training. Diversity (DEI) training was published at GRK in 2025, and no concrete targets have been set for its coverage yet. GRK's HR monitors the completion rate of the training and aims to specify the targets in the future.

### Employee satisfaction

GRK uses eNPS (Employee Net Promoter Score) as a personnel-related strategic metric of overall satisfaction. Employee surveys are used to monitor employees' views on the impacts on own personnel, such as gender equality, equal pay for work of equal value and measures related to preventing violence and harassment at the workplace. The overall satisfaction of the personnel is surveyed annually as part of the personnel survey. The target is set annually, and progress is measured compared to the previous year. In 2025, GRK Group's overall satisfaction was 35, while GRK's strategic eNPS target is eNPS > 40. The responses to the survey have been processed by HR and we will continue to take measures to further improve employee satisfaction.

### Trainees

In addition to training and developing the competence of GRK's personnel, trainees also play a key role in ensuring the continuity of competence. GRK Group's strategic target for 2025 was to have more than 100 interns. The target is set annually, and progress is measured compared to the previous year. The target was achieved, with a total of 108 trainees working at GRK in 2025. In addition, the aim is to have as many trainees as possible return to GRK and to commit the trainees as part of our personnel. Thus, trainee satisfaction (eNPS), which is measured annually at GRK, is one of the most important success metrics. In 2025, the trainees' eNPS was 61, while the Group's strategic target is eNPS > 40, so the target was achieved.

### Basis of preparation for the metrics

GRK Group monthly compiles Group-level HSEQ events related to health and safety, including work-related accidents and the days of absence caused by them, near misses, safety observations and site safety measurements. An

electronic system for collecting information on safety observations and site safety measurements is in use in the country companies in Finland and Sweden. For GRK Eesti AS, the company's quality manager collects information from the sites. Sites report any work-related accidents to the HSEQ team as soon as possible. Reports are made for GRK's own personnel and subcontractors' personnel regarding work-related accidents resulting in absence and "0-day work-related accidents" only resulting in a medical visit. Near misses are reported either through the electronic system or directly to the HSEQ team by phone or email. HSEQ data is compiled and reported at Group level on a monthly basis.

Sickness absences are calculated using the following formula:  $(\text{Days of incapacity for work} \times 0.8) / (\text{Number of employees} \times 365 \text{ days} \times 0.7) \times 100$ . The average number of working days per year is obtained by multiplying the calendar days by a factor of 0.7 and the calendar days of incapacity for work are converted into working days by a factor of 0.8. Information on days of incapacity for work is obtained from the payroll systems.

The accident frequency is calculated by dividing the number of lost-time accidents by the number of hours worked times one million (1,000,000). The metric includes both our own and subcontractors' employees. The accident figures also take into account any accidents of personnel who have joined GRK as a result of acquisitions.

GRK Group's eNPS figure for its own personnel and trainees is collected annually using the employee survey carried out in cooperation with the employment pension insurance company.

In the case of any serious incidents of discrimination and human rights violations, they can be detected through several channels. All channels have been taken into account when compiling the report, including third-party whistleblowing channel reports and other channels such as employee surveys and email.

## S1-6 Characteristics of the undertaking's employees

During the reporting period, the GRK Group had 1,222 employees in Finland, Sweden and Estonia, of whom 138 were women and 1,084 men. GRK's personnel is reported as the headcount at the end of the period.

### Number of employees by gender

Gender	Number of employees (headcount)
Male	138
Female	1,084
Other	0
Not reported	0
<b>Total Employees</b>	<b>1,222</b>

### Number of employees in countries representing at least 10% of employees

Country	Number of employees (headcount)
Finland	936
Sweden	140
Estonia	146

### Employees by contract type broken down by gender

	Female	Male	Other	Not disclosed	Total
Number of employees (headcount)	138	1,084	0	0	1,222
Number of permanent employees (headcount)	122	1,004	0	0	1,126
Number of temporary employees (headcount)	16	80	0	0	96
Number of non-guaranteed hours employees (headcount)	11	46	0	0	57
Number of full-time employees (headcount)	122	1,034	0	0	1,156
Number of part-time employees (headcount)	5	4	0	0	9

### Employees by contract type and country

	Finland	Sweden	Estonia	Total
Number of employees (headcount)	936	140	146	1,222
Number of permanent employees (headcount)	899	89	138	1,126
Number of temporary employees (headcount)	37	51	8	96
Number of non-guaranteed hours employees (headcount)	57	0	0	57
Number of full-time employees (headcount)	874	139	143	1,156
Number of part-time employees (headcount)	5	1	3	9

### Employee turnover

	2025
Number of employees who have left	279
Employee turnover (%)*	22.8%
Resigned employee turnover (%)	5.0%

\*Employee turnover rate also includes fixed-term employment contracts, such as trainees (108) whose employment contract ended during the reporting period

### Basis of preparation for the metrics

At GRK Group, the KPIs related to own personnel cover the personnel in all three operating countries. The number of employees at the end of the reporting period collected from the personnel systems at the end of the reporting period on 31 December 2025 was used in the calculations. The financial statements use the average number of employees for the reporting period as presented in the consolidated financial statements Note 5 Employee benefit expenses.

The numbers of employees, permanent and fixed-term employment relationships as well as employees with non-guaranteed working hours and full-time and part-time employment relationships have been reported using data obtained from the HR system. The age distribution of the company's own personnel has also been collected and calculated using data from the HR system.

The condition for full-time employment is 37.5 working hours per week for salaried employees and 40 working hours per week for site personnel.

The employee turnover rate includes the number of employees leaving the Group during the year who have left the Group voluntarily or due to dismissal or retirement, or who have died while employed. In addition, the figure includes fixed-term employees. The number of people who left is divided by the number of employees at the end of the reporting period. Resigned employee turnover includes the number of employees in an employment relationship who left the Group voluntarily during the year, divided by the number of employees at the end of the reporting period.

The gender distribution of employees has been divided by number of persons based on the information obtained from the personal identity code. GRK operates in Finland, Sweden and Estonia, where it is not possible to register a person as gender neutral according to legislation. Hence, the "Other" group has not been applied when preparing the sustainability report.

### S1-8 Collective bargaining coverage and social dialogue

GRK Group is an organised employer, and the Finnish company is a member of Infra ry. Local labour laws and applicable collective agreements as well as local agreements are complied with in all of GRK's operating countries. Cooperation is carried out in accordance with the legislation of each country, and all local agreements are drawn up in accordance with GRK Group's ethical policies. Local collective agreements are renewed through regular collective bargaining between the employers' union and the employee union. GRK has no agreements with the company's employees on representation by a European Works Council, a Societas

Europaea (SE) Works Council or a Societas Cooperativa Europaea (SCE) Works Council.

At the end of the reporting period, GRK had 146 employees in Estonia, but the share of employees covered by collective bargaining is 0%. The labour market legislation in Estonia differs from Finland and Sweden, and the collective agreement system is different and there is no collective agreement in the sector. Thus, the persons not covered by collective bargaining represent employees of GRK Eesti AS and A-Kaabel OÜ who do not have collective agreements due to local legislation.

#### Percentage of total employees covered by collective bargaining agreements

2025

Group	88
-------	----

#### Collective bargaining coverage and social dialogue

Coverage rate	Collective Bargaining Coverage		Social dialogue
	Employees – EEA (for countries with >50 empl. representing >10% total empl.)	Employees – Non-EEA (estimate for regions with >50 empl. representing >10% total empl)	Workplace representation (EEA only)(for countries with >50 empl. representing >10% total empl)
0–19%	Estonia		Sweden, Estonia
20–39%			
40–59%			
60–79%			
80–100%	Finland, Sweden		Finland

### Basis of preparation for the metrics

The figures on the percentage of employees covered by collective bargaining and social dialogue were retrieved from the HR systems of GRK's country companies at the end of the reporting period.

### S1-9 Diversity metrics

GRK has designated the CEO, the Board and the Management Team as members of top management.

#### Gender distribution of top management

Gender	Headcount	Percentage (%)
Female	7	39
Male	11	61
Other	0	0
Not disclosed	0	0
<b>Total</b>	<b>18</b>	<b>100</b>

#### Age distribution of employees

	Headcount
under 30 years old	209
30–50 years old	752
over 50 years old	261
<b>Total</b>	<b>1,222</b>

### Basis of preparation for the metrics

The gender distribution at top management is disaggregated according to the number of persons based on the information obtained from the personal identity code.

Information on the age distribution of the company's personnel was collected from the HR systems at the end of the reporting period.

### S1-14 Health and safety metrics

GRK promotes a safe and healthy working environment by following uniform occupational health and safety principles based on proactive risk management, an open safety culture and continuous development.

GRK's operating system is certified by an external party in accordance with ISO 9001:2015 (quality), ISO 14001:2015 (environment), ISO 45001:2018 (occupational health and safety), and the certified operating system covers all operations. The rolling stock used for operations in Finland has a safety certificate issued by Traficom. In addition, rail welding, asphalt production and aggregate operations of the Finnish company have been certified by an external party. GRK's certified safety management system covers 100% of the personnel.

Health and safety metrics of employees	2025
Percentage of people in its own workforce who are covered by the undertaking's health and safety management system	100
Number of fatalities as a result of work-related injuries and work-related ill health, own employees	0
Number of fatalities as a result of work-related injuries and work-related ill health, other employees working at GRK's construction sites	1
Number of recordable work-related accidents, own workforce	48
Rate of recordable work-related accidents	26.0

### Basis of preparation for the metrics

The proportion of recordable accidents has been calculated by dividing the number of recordable accidents of the company's own personnel by the number of working hours worked in the entire GRK Group multiplied by one million (1,000,000).

The number of work-related accidents includes all accidents, including those that did not result in absence.

GRK also reports the accident frequency calculated on the basis of work-related accidents resulting in absence of work (entity-specific metric) in section S1-5 of the report.

### S1-16 Remuneration metrics

The gender pay gap calculated on the basis of gross pay was 14.5% and the total remuneration ratio was 18.1.

### Basis of preparation for the metrics

The remuneration metrics include all employees during the reporting period. Information from HR systems about wages paid to employees during the reporting period was used to report the gender pay gap and the total remuneration ratio.

The gender pay gap has been calculated on the basis of the gross pay of employees, including all bonuses. Wages paid during the reporting period are used in the calculation and the wage is divided by the number of hours used for payroll purposes.

The total remuneration ratio is calculated as the ratio of the annual total remuneration of the highest earning individual in the company to the annual median remuneration of employees. Gross pay has been used in the calculation.

### S1-17 Incidents, complaints and severe human rights impacts

GRK's internal whistleblowing channel is open to both internal and external stakeholders. No reports related to S1-17 were received through the whistleblowing channel in 2025. 10 reports were received through other channels. The reports were not related to severe human rights impacts.

In 2025, no cases of discrimination were observed at GRK. Incidents based on gender, race or ethnic origin, nationality, religion or creed, disability, age, sexual orientation or other relevant forms of discrimination have also been taken into account in the incidents. Moreover, no incidents of harassment were observed during the year.

During the reporting period, no serious human rights violations, such as forced labour, trafficking in human beings or the use of child labour, were observed at GRK. No violations of the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Rights or the OECD Guidelines for Multinational Enterprises were observed at GRK. Moreover, no fines, sanctions or damages for severe human rights violations were imposed on the company.

	2025
Number of incidents of discrimination (including harassment)	10
Number of complaints filed through channels for people in own workforce to raise concerns	0
Number of complaints filed to National Contact Points for OECD Multinational Enterprises	0
Amount of fines, penalties, and compensation for damages as result of incidents of discrimination, including harassment and complaints filed, EUR	0

#### Basis of preparation for the metrics

The reporting of the data takes into account all reports filed through the reporting channel during the reporting period and incidents that have come to GRK's attention through other channels, such as the personnel survey or by email. The reports of potential harassment have been raised through GRK's personnel survey and not through the official process. Thus, it has not been possible to investigate individual cases.

## GOVERNANCE INFORMATION

**G1 Business conduct**

## G1 Business conduct

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Protection of whistleblowers		Negative impact (potential)	An ineffective whistleblowing channel or inadequate whistleblower protection can have a negative impact on whistleblowers.	GRK's anonymous whistleblowing channel is available to both the company's own personnel and all stakeholders. All reports are handled appropriately, and the protection of the whistleblower is always ensured so that their identity is not disclosed and the whistleblower or their employment relationship is not harmed. GRK's Chief Legal Officer is responsible for processing reports received through the whistleblowing channel together with an external expert service representative. The external expert contributes to ensuring that all reports received through the channel are processed equally.		x		short-term and medium-term
		Risk	Non-compliance with whistleblower protection legislation can increase other operating expenses through fines, policy changes or regulatory proceedings, for example.		x	x	x	short-term
Relations with suppliers		Positive impact (actual)	Regular and effective cooperation with our partners and smooth and fair payment practices improve the operational capacity of GRK's partners. Effective cooperation is seen as a key factor in building sustainable success.	GRK's policies are recorded in GRK's Corporate Sustainability Requirements for Supplier provided to partners. GRK's payment terms (usually a maximum of 30 days) support responsible and fair cooperation, providing even smaller operators better prerequisites for operating profitably and in the long term as GRK's partner and supplier.	x	x		short-term and medium-term
Corruption and bribery	Prevention and detection, including training	Negative impact (potential)	The construction of public projects often requires significant public funding and regulatory oversight, which can create opportunities for corrupt practices such as bribery and fraud. This is particularly emphasised in situations where contracts are awarded, permits are issued or inspections are carried out.	GRK has the Principles of Fair Operations and related training in place. Operations are also guided by anti-corruption policy and competition law guidelines. Every GRK employee must complete the training on the Principles of Fair Operations annually. GRK's policies are also described in the Group's Corporate Sustainability Requirements for Suppliers, to which the company requires all partners to commit. In addition, the whistleblowing channel, which is open to all stakeholders, makes it possible to report grievances completely anonymously. A representative of an external expert service is also involved in processing the reports to ensure that all suspected misconduct and violations are processed equally.	x	x	x	medium-term
		Risk	The construction industry involves an increased risk of corruption and bribery, especially in cooperation with the public sector. A risk can also arise if the whistleblowing channel process does not work.		x	x	x	medium-term

Sub-topic	Sub-sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Upstream	Own operations	Downstream	Time horizon
Political influence and lobbying activities		Negative impact (potential)	The construction of significant infrastructure projects requires the approval, funding and compliance with regulations of the operating country's government. As projects have a broad impact, they can be subject to political influence from various stakeholders, such as construction companies, environmental organisations and local communities. Stakeholders may seek to influence legislation, funding decisions or regulations that may affect the construction and operation of projects.	GRK does not engage in politics, does not participate in political activities and refrains from all support for political activities.	x	x	x	medium-term
		Risk	Lack of transparency or inconsistency in political engagement can pose a regulatory compliance risk, as authorities require consistent reporting of lobbying activities, donations and advocacy. This can increase other operating expenses costs through audits, policy reviews, or regulatory compliance reforms, for example.			x	x	medium-term

*Impacts, risks and opportunities related to business conduct*

An important part of GRK's strategy is an entrepreneurial culture that we want to nurture and develop. GRK's governance and management play an important role in strengthening the corporate culture. This means that GRK's strategy is closely linked to ethical business conduct and corporate culture.

An ineffective or unreliable whistleblowing channel and inadequate whistleblower protection has been identified as a potential negative impact that could jeopardise the well-being of whistleblowers and their willingness to raise concerns. If realised, the impact would be tied to GRK's strategy. An ineffective whistleblowing channel can also pose a financial risk, for example through fines or official proceedings. GRK's strategy emphasises an honest and uniform operating culture, and a functioning whistleblowing channel supports this by promoting open and straightforward operations that are part of GRK's values.

GRK has identified a positive impact related to supplier relationships and payment practices. Regular and smooth cooperation with suppliers and contractor partners as well as fair payment practices are seen to improve the operational capacity and financial sustainability of the partner network. The impact interacts with GRK's strategy, as good supplier relationships have created tangible benefits for the company, and long-term subcontracting partnerships have been one of the key factors in GRK's success, bringing continuity and expertise to projects. GRK's values emphasise cooperation and unity with both partners and customers. For partners, this cooperation is particularly visible as a strong team spirit and close work towards common goals.

GRK's business is linked to public infrastructure investments. Cooperation with the public sector can result in exposure to corruption and bribery. This has been identified as a potential negative impact for GRK, which may manifest itself as dishonest conduct, for example, in connection with tenders, permit processes or inspections. The occurrence of corrupt practices also poses a financial risk and, if they were to occur, could lead to legal consequences, fines, loss of projects or reputational damage. GRK's strategy emphasises success in critical infrastructure and defence administration projects. In addition, public sector projects account for more than one-half of GRK's customer accounts. In these sectors, trust and good governance are further emphasised. GRK has zero tolerance for corruption and bribery, and the strategic goal of being a forerunner in sustainable construction also requires ethical governance.

Infrastructure construction projects often have a broad social impact and involve political decision-making. For this reason, political influence has been identified as a potential negative impact. In addition, inconsistent influencing may pose a regulatory compliance risk to the company. GRK has deliberately adopted a policy of not participating in or supporting political activities.

GRK's most important actions in 2025 related to good governance were the expansion of the fair operations tour to an increasing number of locations in all country companies and the publication of the Corporate Sustainability Requirements.

The fair operations tour increases GRK's personnel's awareness of the Principles of Fair Operations and its content. This aims to promote the implementation of the principles in day-to-day life and the achievement of the targets related to training coverage. The fair operations tour covered both our own personnel and the employees of subcontractors. The Corporate Sustainability Requirements, on the other hand, aim to ensure the implementation of responsible business also in GRK's supply chain and promote good supplier cooperation. The content and scope of the Corporate Sustainability Requirements is explained in more detail in section G1-2 of the report.

GRK has not yet set measurable, result-oriented or time-bound targets related to whistleblower protection, supplier relations or political influence and lobbying activities. The setting of targets will be reviewed again in 2026. The effectiveness of the policies and actions in relation to material sustainability-related impacts, risks and opportunities is still monitored through means such as the employee survey, whistleblowing channel reports and supplier audits. Progress in these areas is monitored annually compared to the previous year.

### G1-1 Business conduct policies and corporate culture

GRK's ethical guidelines are aggregated into the Principles of Fair Operations, which include the Group's common Code of Conduct. GRK's Principles of Fair Operations are based on legislation, official regulations and the company's values, based on which concrete procedures have been built for GRK's management and employees for different scenarios. GRK's goal is also to commit our partners to the Principles of Fair Operations and to ensure that partners follow similar practices in their cooperation with GRK.

The Principles of Fair Operations are used in particular to manage the prevention and detection of corruption and bribery as well as negative impacts and violations related to political influence. The principles describe GRK's zero tolerance for bribery and corruption and refraining from all forms of support for political activities.

The Principles of Fair Operations have been drawn up in cooperation with the personnel and confirmed by GRK's Board. The principles cover all of GRK's country companies and apply to every employee, regardless of their position. Every member of GRK's personnel must familiarise themselves with the Principles of Fair Operations and complete online training on the principles annually. GRK monitors the completion rate of the online training using data from the HR management system.

The principles are also available to all stakeholders on GRK's website, and their key content is recorded in GRK's Corporate Sustainability Requirements, which are provided to all partners.

In order to implement the values and operating methods throughout the organisation, a site tour of the Principles of Fair Operations was carried out in all of GRK's three operating countries in 2024 and 2025. The site tour visited GRK's sites and offices and has so far reached more than 900 GRK and subcontractor employees. In addition to providing opportunities to discuss the meaning of fair operations, the site tour also offered the participants the chance to highlight other issues related to work, the smoothness of operations and other issues perceived as important.

GRK Group's Chief Legal Officer is responsible for monitoring and updating the Principles of Fair Operations.

GRK evaluates the realisation of corporate culture, for example, with the help of the responses to the annual personnel survey. The survey contains the following statements:

- "The values of my workplace do not conflict with my own values"
- "Managers act in accordance with the organisation's values and culture"
- "Management communicates and acts consistently"

GRK's internal operations have not been identified as being at particular risk of corruption or bribery.

### Whistleblowing channel

GRK has a whistleblowing channel for detecting activities that violate the law or GRK's policies. The whistleblowing channel can be used to anonymously and confidentially report any concerns related to GRK's operations or compliance with the Principles of Fair Operations, suspected misconduct or unethical activities. The reports may concern, for example, potential incidents related to harassment, conflicts of interest, misuse of property or breaches of rules binding GRK. GRK's training on the Principles of Fair Operations explains the use of the whistleblowing channel, and the instructions are also available to all employees in GRK's internal communication channel.

All reports received through the whistleblowing channel are investigated appropriately and confidentially. The whistleblowing channel is primarily aimed at GRK's employees, but reports can also be submitted by other stakeholders, such as GRK's partners, subcontractors, shareholders and GRK's management.

The legal requirements of the EU Whistleblower Protection Directive (EU 2019/1937) have been taken into account in the investigation of reports received through GRK's whistleblowing channel and in the protection of whistleblowers. The process ensures that misconduct is investigated appropriately and confidentially and that the person who submitted the report receives appropriate protection and their rights are respected. The whistleblower's identity will not be disclosed unless required by law. The anonymous chat feature of GRK's whistleblowing channel supports this anonymity.

Reports received through the whistleblowing channel are also processed by a representative of an external expert service, which ensures that all reports are processed equally and are not dependent on a single person's assessment. The processing team includes a representative of the expert service and GRK's Chief Legal Officer. The processing team will send the whistleblower a confirmation within seven days of receiving the report. The representative of the expert service makes a recommendation on the matter to GRK's internal processing team,

which decides on the investigation. The whistleblower will be informed of the actions taken as a result of the notification within three months of receiving the notification.

GRK's Chief Legal Officer is responsible for implementing the whistleblowing channel and reports any notifications to the CEO and the necessary salaried employees for remediation. In addition, the Chief Legal Officer reports on the notifications quarterly to the Audit Committee, from which the information is relayed to the Board.

### Completion of Principles of Fair Operations online training

	2025
Percentage of board members and senior management with completed training, %	94%
Percentage of total personnel with completed training, %	64%

### Basis of preparation for the metric

The Principles of Fair Operations online training completion data was retrieved from GRK's training platform on 31 December 2025 and divided by the average number of persons for the period.

### Target related to the development of corporate culture

In order to strengthen ethical operations and the corporate culture in line with the Group's values, GRK has set the target of increasing awareness of the Principles of Fair Operations and the coverage of online training. Surveying the coverage began for the first time in 2025. GRK's continuous target is to achieve 100% coverage of personnel for the training each year. At the end of the reporting period, the coverage of Principles of Fair Operations training in the Group was 64%, and the work to achieve the target will continue in 2026. Information on the coverage of training is collected from GRK's HR training system.

The target has been set by GRK's Management Team and stakeholders have not participated in setting the above target.

## G1-2 Management of relationships with suppliers

GRK strives to require partners to adhere to the same policies that we implement in our own operations. All subcontractors, consultants and brokers who provide services to GRK, including suppliers of materials and equipment required for the work, are considered to be GRK's partners. GRK wants to be a reliable partner for its suppliers and to act fairly and transparently towards suppliers, for example with regard to tendering or the agreement process. We stick to what we have agreed and strive for mutual success. Any problems are settled through negotiation.

GRK has prepared the Corporate Sustainability Requirements for Suppliers to ensure that the company's procurement meets the legal obligations and GRK's own sustainability requirements. The policies are used to manage the impacts, risks and opportunities related to supplier relationships. The overall objective of the requirements is to ensure responsible operations throughout the value chain. Suppliers must comply with GRK's values, the Principles of Fair Operations and all applicable laws and regulations. Key content areas include compliance with legislation and ethical principles, compliance with sanctions and integrity, information security, occupational health and safety, and the environment. In addition, the requirements specify the high-risk procurement activities identified by GRK and the policies applied to them.

The fulfilment of GRK's criteria is monitored during the contractual relationship through supplier assessments and audits. In the assessment, GRK's site management gives an assessment of the supplier used and the assessment is recorded for viewing in the internal Greta system. In the audit, GRK's HSEQ team carries out the supplier audit in accordance with the requirements set by the certified management system. Any deviations identified during the audits are recorded and corrected immediately, but no later than two months after the observation.

The Corporate Sustainability Requirements are uniform in all GRK's country companies. The requirements are targeted at service providers and suppliers and their potential subcontractors that deliver products or services to GRK. The primary stakeholder in the scope of application are GRK's suppliers.

GRK's supplier requirements are based on the international standards and initiatives that GRK is committed to complying with in its own operations. GRK operates in accordance with the ISO 45001:2018 occupational health and safety management system and the ISO 14001:2015 environmental management system. The requirements are based on all applicable national and international legislation, such as human rights and labour standards. In addition, suppliers must commit to operations aligned with GRK's human rights policy. The human rights policy is based on international principles such as the UN Universal Declaration of Human Rights, the UN Global Compact, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

The content of the requirements also reflects the expectations and interests of key stakeholders. The requirements emphasise employee safety and fair treatment in the supply chain. Thus, the interests of workers and the parties representing them, such as safe working conditions, terms of employment and respect for human rights, have been taken into account in the principles. The requirements also include the expectations of authorities and society, such as measures against the grey economy, environmental protection and compliance with sanctions. At the same time, requirements based on fair operations also protect the interests of other industry operators.

Corporate Sustainability Requirements cover, in addition to good governance practices, social and environmental impacts, which are taken into account already at the partner selection stage. Through the document, GRK requires suppliers to commit to operations that respect human rights, labour standards, statutory contractor obligations, data security, and environmental regulations. Suppliers are required to commit to GRK's Principles of Fair Operations, Human Rights Policy, and applicable labour legislation. Light entrepreneurship is prohibited in GRK's procurement chain, and suppliers must provide safe working conditions for both their employees and subcontractors. Environmental criteria include minimizing environmental impacts, complying with environmental legislation, and favouring environmentally friendly solutions. In addition, key suppliers are required to report their CO<sub>2</sub> emissions.

GRK's Chief Legal Officer is responsible for preparing and updating the Corporate Sustainability Requirements. GRK Group's Chief Risk Officer is responsible for the implementation. The Corporate Sustainability Requirements are available to all stakeholders on GRK's website, and suppliers are also informed of the requirements as part of the procurement process.

GRK does not cooperate with suppliers that do not meet the criteria set out in the Corporate Sustainability Requirements. In addition to the requirements set, the suppliers' backgrounds and related risks are investigated on a risk-based basis before engaging in procurement.

GRK's payment practices for suppliers, including small and medium-sized undertakings, are presented in section G1-6 of the report.

### G1-3 Prevention and detection of corruption and bribery

GRK recognises corruption as one of the key risk areas because GRK operates in the construction sector and in cooperation with the public sector. Illegal activities are in conflict with GRK's values and the Principles of Fair Operations. In addition, any misconduct weakens GRK's chances of success in future tenders and thus increases the possibility of financial risk. Corruption, bribery or other misconduct is not tolerated in any form or level of GRK's business.

The policies and actions related to the prevention of corruption and bribery are recorded in GRK's anti-corruption policy. They summarise GRK's commitment to anti-corruption and anti-bribery activities and supplement the Principles of Fair Operations. The anti-corruption principles are based on zero tolerance for corruption and bribery. The aim is to ensure honest business conduct, prevent corruption risks and protect GRK's reputation. The policy covers, among other things, gifts and hospitality, conflicts of interest, activities with public officials and third parties, and sponsorships and donations. Monitoring is carried out through internal control, the whistleblowing channel and investigation of suspected misconduct. The principles are based on GRK's values, the Principles of Fair Operations and the applicable legislation and regulations. The policy was drawn up taking into account the expectations of GRK's customers, authorities and partners regarding transparent and ethical operations.

The policy applies to all of GRK Group's country companies, Board, management and employees, regardless of their position. In addition, the aim is to commit partners to the same practices through the Corporate Sustainability Requirements. The scope of application covers own operations, partners and all geographical areas in which GRK operates.

GRK Group's Chief Legal Officer is responsible for preparing and monitoring the policy, and the policy is available to GRK's personnel in the company's internal communications channel.

GRK's policies related to anti-bribery and anti-corruption activities (Principles of Fair Operations and anti-corruption policy) comply with international standards, such as the UN Convention against Corruption. As with all GRK policies, the anti-bribery and corruption policy is reviewed regularly by the Management Team and the Audit Committee of the Board. Any amendments to the policies are approved by GRK's Board.

Corruption and bribery are addressed as one area in GRK's training on the Principles of Fair Operations. The training clearly explains what corruption, bribery, the grey economy and conflicts of interest mean and provides examples of each topic. In addition, the personnel are given concrete instructions on how to proceed in these situations.

The most important channel for detecting and handling allegations or incidents of corruption and bribery is the whistleblowing channel open to all stakeholders. The whistleblowing channel and the report handling process are described in section G1-1 of the report. In addition, GRK's financial management system is one of the means of internal control.

GRK's Chief Legal Officer reports all reports received through the whistleblowing channel to the CEO and the Audit Committee of the Board on a quarterly basis. Ten reports were received through the whistleblowing channel in 2025. Two of the reports related to corruption or bribery. One of the reports was found to be unjustified and the other is still under investigation.

### G1-4 Incidents of corruption or bribery

In 2025, no violations related to corruption or bribery were observed at GRK, and GRK has not been fined or sentenced for such violations. Moreover, there were no disciplinary measures, terminations of contracts or legal proceedings.

The reports received through GRK's whistleblowing channel have been received and processed or the process is ongoing. Based on the reports processed, GRK did not find any misconduct related to corruption or bribery that resulted in actions.

During the reporting year, there were also no cases of corruption or bribery involving actors in the value chain. In accordance with GRK's Corporate Sustainability Requirements, suppliers must report their activities and any ethical violations as agreed. GRK could also become aware of such incidents through public media, for example.

In May 2025, GRK announced that the Finnish Competition and Consumer Authority (FCCA) had started an unannounced inspection at the premises of GRK Infra Plc's subsidiary GRK Suomi Oy. According to the information received by GRK from the FCCA, the FCCA aims to establish whether there has been cooperation between competitors prohibited by competition law in the asphalt sector in Finland. At this stage, GRK does not have any information on the outcome of the inspection. GRK is cooperating fully with the FCCA in its investigation but cannot comment any further on the ongoing investigation.

#### Target related to incidents of corruption and bribery

With regard to good governance, GRK's strategy includes the continuous target of keeping the number of incidents of corruption and bribery at the company at zero. The number of incidents has been reported since 2022. In 2025, there were no cases of corruption or bribery, so the target was achieved. In potential incidents, all channels through which GRK could have become aware of the incidents have been taken into account. These channels include the whistleblowing channel, the employee survey and other channels, such as email.

The targets have been set by GRK's Management Team. Stakeholders have not participated in setting the above targets.

### G1-5 Political Influence and lobbying activities

Political influence and lobbying activities are seen to create a material potential negative impact for GRK and a risk related to regulatory compliance, as significant infrastructure projects have a broad impact on society and can be subject to political influence from various stakeholders, such as construction companies, environmental organisations and local communities.

GRK does not engage in politics, does not participate in political activities and refrains from all support for political activities. In addition, the company did not make monetary or other political donations during the reporting period.

As GRK refrains from all support for political activities, the company also has no main topics or views of lobbying activities that would interact with the impacts identified in the double materiality analysis.

GRK's Chief Legal Officer is responsible for monitoring refraining from political influence and lobbying activities. GRK's legal functions keep records of events in which employee representatives also participate in an expert role. This allows the company to ensure that there is no political influence.

In 2025, GRK participated in an event related to the proposed decree VN/25965/2023, amending the Waste Act, part III - circular economy act 2024–2026. At the event, GRK was involved in an expert role in communicating the current state of the circular economy, not in influencing the possible implementation of the decree. The decree relates to the risk identified as material for GRK in relation to climate change mitigation.

There are no members of GRK's administrative, management or supervisory bodies who would have held similar positions in public administration within two years prior to their appointment to the current position. GRK Suomi Oy is registered in the Finnish Transparency Register under registration number GRK-25-1582-R.

### G1-6 Payment practices

We adhere to the payment terms punctually and strive to ensure that suppliers receive their payments on time in accordance with GRK's payment terms. GRK does not have separate policies for preventing payment delays to small and medium-sized companies, but the general policy is to pay all invoices on time.

In GRK's Group companies, the payment term for corporate customers is usually 30 days but may vary depending on the agreement and country. For example, in Finland, suppliers can choose a payment term of 14 days net against a 2% discount. In Sweden, the payment term is 30 days, but shorter payment terms are agreed on a case-by-case basis for smaller suppliers. In Estonia, payment terms vary between 7 and 30 days, and shorter payment terms are usually agreed for smaller suppliers than for larger suppliers.

GRK Group ensures that payments are made on time and that GRK has no pending legal proceedings due to payment delays.

	2025
The average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment starts to be calculated, in number of days	23,3
Percentage of payments aligned with standard payment terms	95%
Legal proceedings related to late payments	0

For Finland, 36% of invoices have been paid within 14 days and 59% within 30 days (excl. payments with a term of payment of 14 days).

#### Basis of preparation for the metrics

The calculations are made from the invoice date to the payment date. The information has been obtained from the invoice verification and accounting systems. The calculations use a representative sample and therefore take into account the January–November 2025 invoices of GRK Suomi Oy, GRK Sverige AB and GRK Eesti AS. The companies acquired in 2025 and the Group's parent company GRK Infra Plc have not been taken into account in calculating the metric, as their impact is insignificant. Invoices outside the sample are estimated to be paid within the same period. The percentage of payments aligned with the company's standard payment terms includes the portion of invoices that are paid within 30 days. The information is reported separately for Finland, as the number of payments is highest in Finland compared to other operating countries.

## Entity-specific disclosures

Sub-topic	Impact	Description	Impacts on business model, strategy, value chain and decision-making and related measures	Impacts			Time horizon
				Upstream	Own operations	Downstream	
Development of social infrastructure	Positive impact (actual)	We participate in the development of social infrastructure by building infrastructure that is vital to society. These projects improve safety, accessibility and the functioning of society. The positive impacts particularly concern GRK's customers in the downstream value chain.	The infrastructure built by GRK, such as roads, highways, railways and bridges, supports people's mobility, the smoothness of everyday life and regional development. In many of our projects, the client is responsible for taking into account the requirements of society. GRK, on the other hand, focuses on taking quality, safety and environmental criteria into account in all work. GRK's work is guided by a certified quality management system that takes occupational, environmental and operational safety into account. GRK Group's goal is to deliver a flawless product or service to the customer within the agreed timetable and with professional service. The key pillar of our strategy is profitable growth, which is pursued by offering services, solutions and products that are cost-effective and of high quality.		x	x	medium-term
Development of industrial infrastructure	Positive impact (actual)	The infrastructure built by GRK promotes industrial infrastructure by responding to the needs of various industrial areas and undertakings, among other things. High-quality infrastructure solutions facilitate the realisation of industrial investments and sustainable growth.	GRK's strategy takes into account geopolitical changes, economic outlooks and megatrends. Our view is that projects related to the sustainable transition of industry and the construction of energy infrastructure are accelerating infrastructure construction. Energy efficiency, circular economy, low emissions and stopping biodiversity loss are at the heart of sustainable infrastructure construction. In accordance with the strategy, GRK wants to strengthen its share in green transition projects.		x	x	medium-term

*Entity-specific impacts, risks and opportunities*

Entity-specific disclosures refer to sustainability information related to GRK's business, which may not be included in the general standards, but is relevant to GRK's operations.

### Impacts on social and industrial infrastructure

The double materiality analysis identified positive entity-specific impacts of GRK's operations related to the construction of infrastructure that promotes society and industry. These positive impacts particularly concern GRK's customers in the downstream value chain.

The positive impacts are manifested in both social and industrial infrastructure. Roads, highways, railways and bridges built by GRK improve the functionality, safety and accessibility of society. They support regional development and, at the same time, smooth day-to-day life. In addition, GRK's solutions support the operating conditions of our industrial customers, such as sustainable and efficient transport infrastructure that serves the economy.

### Policies, actions and resources

The policies related to entity-specific impact management are based on GRK's HR policy and quality, safety and environmental policy. In addition, operations are guided by the Principles of Fair Operations. Our policies require us to comply with statutory environmental and social responsibility obligations, ensure occupational safety and communicate openly about the progress of the project.

GRK's HR policy, quality, safety and environmental policy and Principles of Fair Operations guide all of the Group's projects. The safety, quality and environmental policy ensures that GRK's infrastructure projects are implemented in a safe and high-quality manner that minimises local negative impacts and produces positive impacts for communities, such as better mobility, safety and accessibility of services. The HR policy and the principles of fair operations address the identified impacts by defining our practices in relation to equal treatment of people, a safe working environment, ethical conduct and the prevention of harmful social and environmental impacts.

The policies apply to all GRK employees, sites and operating countries as well as key suppliers and subcontractors participating in the projects. The policies also support the expectations of our stakeholders and GRK's strategic goal of being a forerunner in sustainable construction.

The Group's management is responsible for the implementation of the policies, each in their respective area of responsibility, and HSEQ functions and project management are responsible for their practical implementation and monitoring. The key content of the policies is described in section S1-1.

The activities related to the construction of infrastructure that promotes the operations of society and industry are based on GRK's operating system, which has been certified by an external party in accordance with ISO 9001:2015 (quality), ISO 14001:2015 (environment) and ISO 45001:2018 (occupational health and safety) for each country company. We use competent personnel, suitable equipment and project management expertise in our projects to ensure that quality, schedule and cost-effectiveness meet the client's expectations. Understanding the client's requirements is important to us throughout the project life cycle: during the tender stage, we familiarise ourselves with the client's requirements in the requests for tenders, and during construction, we report regularly on the progress of the projects to the client. We also react to any need for changes. The actions related to the identified impacts are continuous and part of GRK's daily operations. In 2025, no specific actions were taken to further the identified impacts.

### Targets and metrics

GRK has set a concrete goal for this topic and monitors its achievement with a strategic metric reflecting customer satisfaction. This is a direct indicator of how well we are able to meet clients' expectations.

Customer satisfaction is measured systematically by means of project-specific feedback surveys, in which client representatives evaluate the various aspects of the project (communications, safety, schedule, quality). GRK has set the target of keeping this feedback at an excellent level, with a score of at least 4.5 (scale 1–5). The survey is conducted once during the project, and the metric includes all projects completed in 2025.

Customer satisfaction for 2025 was 4.5 and the Group's target was achieved. 40% of respondents took part in the survey. The feedback received from the clients serves GRK as both a sign of success and a basis for development work: if an area receives lower feedback, we address it with internal measures.

The customer satisfaction for 2025 serves as the baseline value and customer satisfaction will be compared to the previous year in future. The target is annual. The metric is not aligned with third party standards. Stakeholders have not participated in setting the target, but it has been set by the Management Team.

### Basis of preparation for the metric

GRK measures customer satisfaction annually by means of a country-specific survey, and the aim was to send it to all clients of contracts completed in 2025. The survey does not cover the environmental services business. In Sweden and Finland, the sets of questions are uniform, but in Estonia, feedback is requested using the country company's own questionnaire. The rating scale is the same in all operating countries, 1–5. In Estonia, the feedback is collected immediately after the end of the project, while the results are compiled once a year in Finland and Sweden.

The limitation of the metric is that the response rate varies annually and by country, and responses are not received for all completed projects. This means that the average reflects the experience of the clients that have responded to the survey and not the views of all projects. In addition, due to the differences in question structure between countries, the results are not comparable in all respects.



**GRK Infra Plc**

Jaakonkatu 2, FI-01620 VANTAA, FINLAND

+358 10 321 4110

Business ID 0533768-1

[www.grk.fi](http://www.grk.fi)