



2024 CORPORATE SOCIAL RESPONSIBILITY REPORT

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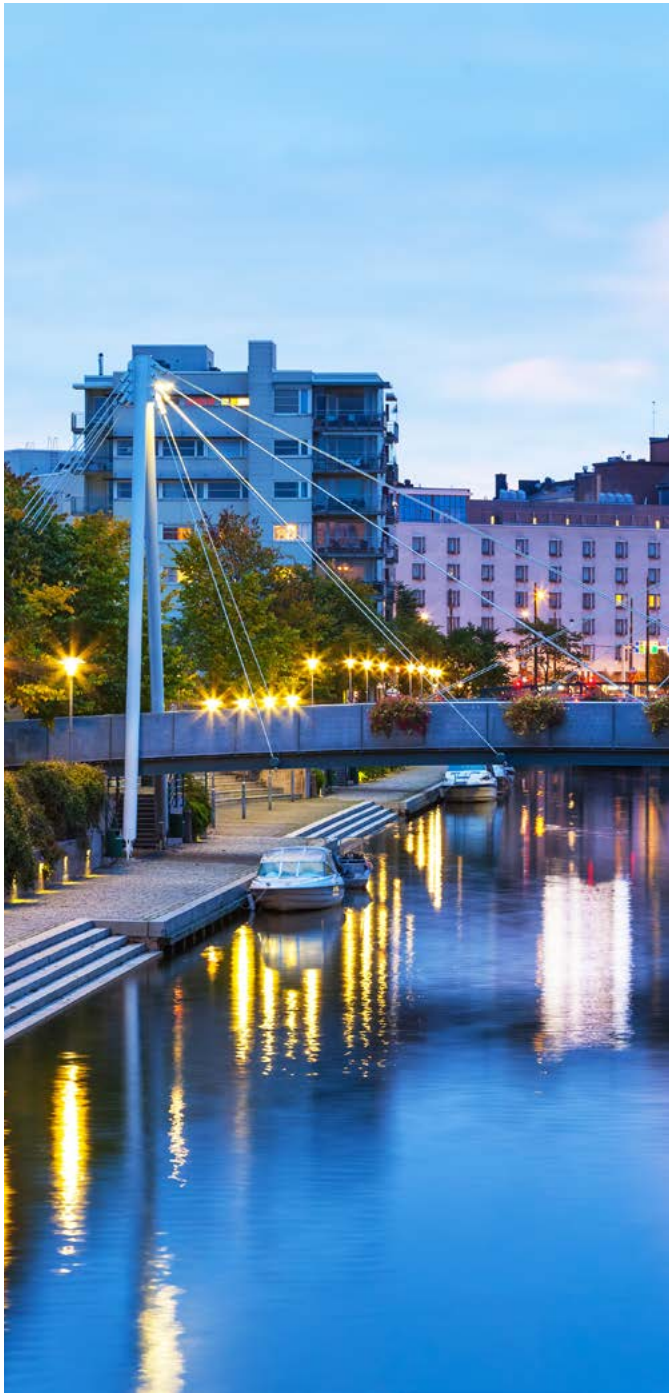
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Company profile

The ALM Partners Group (hereinafter ALM Partners) is formed by the parent company ALM Group Oy and the subsidiary ALM Partners Oy.

The youthful and rapidly growing ALM Partners offers top-notch expertise and solutions in risk management, regulatory reporting, and data and systems to players in the finance and insurance sectors.

At ALM Partners, our mission is to support and help ensure the functioning of banking operations and the financial system. We promote efficient, modern, and transparent banking, financial, and funding activities that are grounded in sound risk management. We help our customers achieve their business objectives with high-level experts, individually designed services, and innovative technical solutions. We mainly operate in Finland and Sweden, but increasingly also in the Nordic countries, the Baltics, and elsewhere in Europe.

ALM Partners is a good place to work, offering opportunities for professional development, influence over your own role, and growth as a professional. We are a mid-sized, low-hierarchy expert community where individuals have the ability to make a real impact.

ALM Partners is mainly owned by our staff (85%). During the year, we gained 18 new individual shareholders (partners), and by the end of 2024, there were already a total of 77 partners. The foundation of our operations is created by the technical and industry-specific expertise of our staff, our customer-oriented attitude, and our efficient services that promote business. At the end of 2024, we had 178 employees, an increase of 21% from the corresponding 147 employees in 2023.

Our operational turnover grew by 16% in 2024 to 16.1 million euros from 13.9 million euros in 2023. During the year, we invested heavily in growth, the development of our products, and especially in our staff. We took a total of 13 young professionals into our six-month Trainee program to develop their skills for the future challenges of the financial sector. Despite our investments, our profitability remained good. Our operational margin was 6.9% of our turnover.

For the well-being of our society, the creation of new productive jobs in the private sector is the only guarantee for financing and continuing our well-being. Our societal impact increased significantly during 2024. In total, the amount of direct and indirect payments made to our society increased by 13% to over 6.1 million euros, which was 38%

relative to our turnover. In practice, this means that our contribution to society per person-year was around 38.000 euros in 2024.





Letter from the CEO

The challenges of the economic and security situation and the importance of responsible action were emphasized in our operating environment in 2024.

Responsibility and its reporting have been strongly and widely emphasized in the corporate field, especially in the reporting of our main customer base, the banks. In addition to our own responsibility reporting, we support the implementation of responsible financing by banks in Finland and more broadly in Europe through our services.

At ALM Partners, we find it particularly important that companies treat their employees with respect, appreciation, and fairness. Simultaneously, the company must bear its responsibility in a broader societal framework as a good employer, a conscientious taxpayer, and an actor supporting overall security. In this way, a safe society, skilled people, and societal stability are maintained. Instead of the minimum levels set by laws, we strive to exceed our own and external expectations, bearing societal responsibility more than our size. At the same time, we at ALM Partners see it as our important societal responsibility to support and help ensure the functioning of banking operations and the financial system that are critical to society.

During 2024 and the beginning of 2025, ALM Partners has invested extensively in personnel - significant recruitment of new staff has taken place. Supporting the well-being and comfort of our staff is at the center of our operations. In this way, both new and more experienced professionals can cope in the midst of customer projects that require high expertise, in the ambitious and goal-oriented work environment of a growth company. In addition, we act as enablers of responsible, open, and secure banking, finance, and insurance operations through our own services.

Let us continue to do our part to strengthen common well-being, responsibility, and overall societal security, both in our own company and more broadly in Finland and Europe.

Aaro Mäkelä

CEO
ALM Partners Oy

Values and strategy

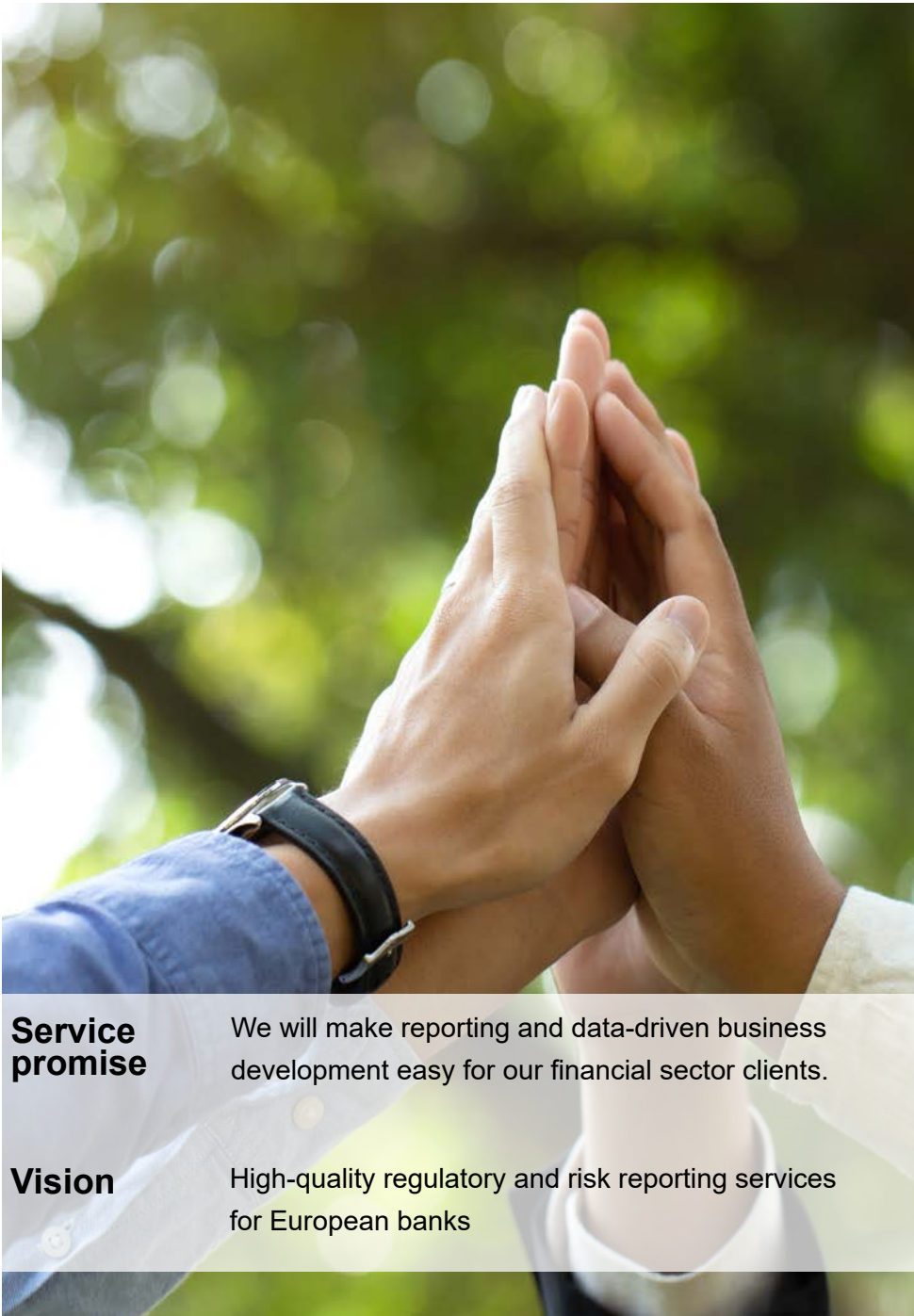
During 2024, we initiated the process of renewing our strategy for the 2025–2028 strategy period. The sustained and even accelerating growth of our business requires a broader international presence, which is reflected in the core objectives of our strategy.

Our goal is to be the leading provider capable of delivering the entire value chain of risk and regulatory reporting for banks, from data generated by banking systems to business reporting delivered to authorities and other stakeholders.

The core values and principles of ALM Partners have been with us since the founding year, and we continue to work long-term according to them, also in 2025.

Our mission is to support and ensure the operation of society’s financial and insurance system, to promote efficient and transparent risk-based banking, finance, and financial operations, and to assist our customers in implementing good responsible business, building decision-making information, and modeling risk management tasks.

ALM Partners is a good workplace that allows for professional development, influence on one’s own job description, and growth as a professional. We are a mid-sized, low-hierarchy expert community where individuals can make a real impact. Partnership allows participation in the strategic work and decision-making belonging to the company’s owners, as well as participation in the possible development of the company’s value.



**Service
promise**

We will make reporting and data-driven business development easy for our financial sector clients.

Vision

High-quality regulatory and risk reporting services for European banks

Values

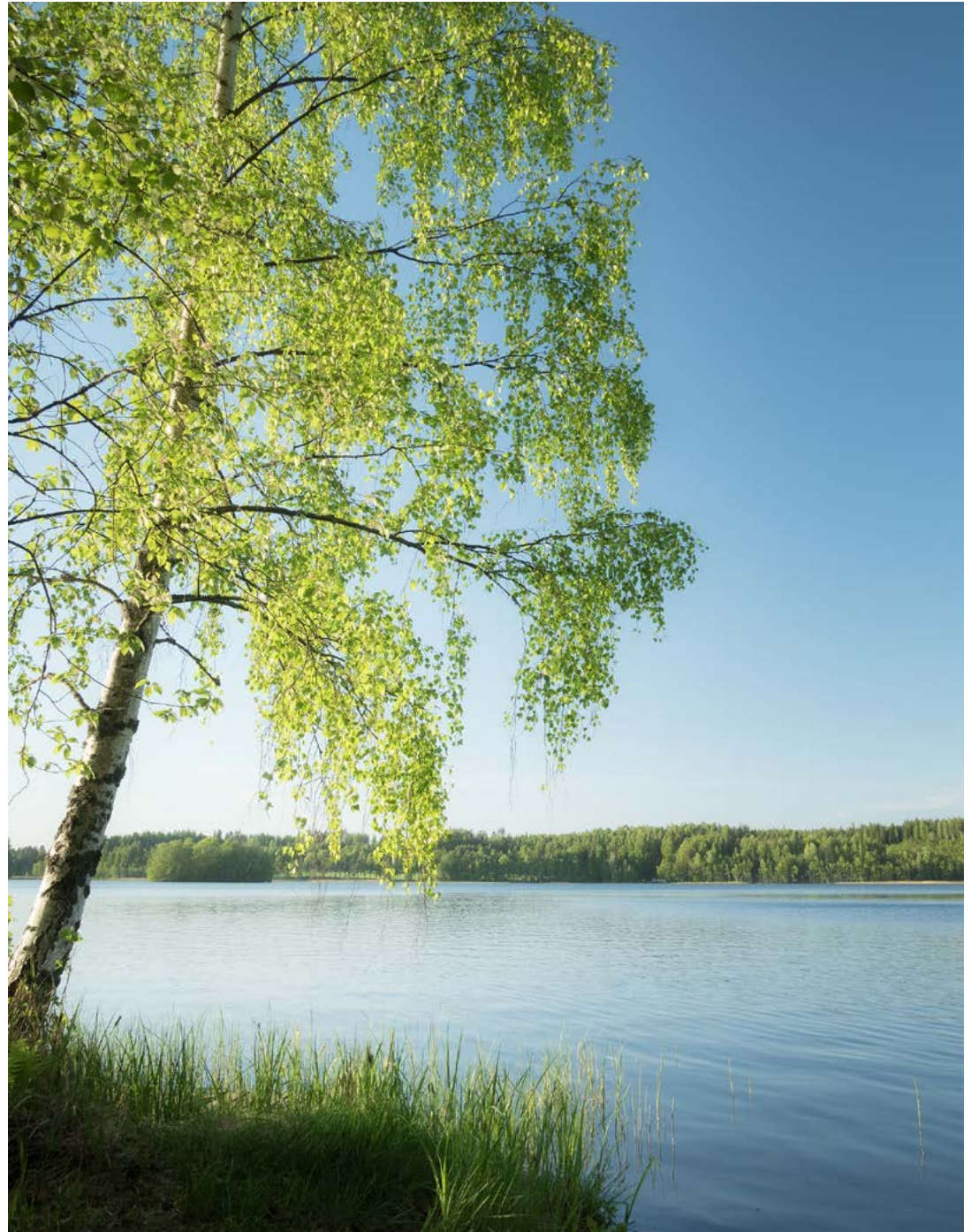
Our values	Internal perspective	External perspective
Respect	We treat others the way we wish to be treated ourselves.	We only offer services that our customers need.
Trust and reliability	We believe in and trust each other.	Our products and services are of high-quality. We stick to what is agreed upon.
Transparency	We communicate and discuss matters openly.	Our operations are transparent and planned together with the customer.
Development	We encourage each other to develop our own skills.	We anticipate customer needs and offer innovative solutions to a changing world.
Responsibility	We support sustainable development and create new jobs.	We build a balanced future for the financial sector.

Stakeholders

We want to be a reliable partner for all those who interact with us, and that's why our stakeholders are at the core of our operations and in our everyday life. Our strong growth and expanding, internationalizing markets lead to the growth of our network, and relationships that serve all parties are indeed our lifeline. We strive to find the best practices through active discussion, both for the development of our own operations and for working with stakeholders, with our ultimate goal being to serve our customers even better.

Our stakeholders are

- Customers
- Employees
- Owners
- Collaborators
- Service providers
- Schools and universities
- Local communities
- Social entities e.g. authorities, industry organizations
- Media



Our responsibility goals and their realization

In 2024, as in previous years, we continued to advance many of our responsibility goals and remain committed to carrying this work forward into 2025. In line with our strategy, we recognize our part in supporting and ensuring the operation of society's financial and insurance system, promoting and assisting our customers in implementing responsible business based on modern and good risk management. We want our responsibility themes to be part of our everyday life and ongoing activities.





Customer responsibility

In addition to our annual targeted internal projects, we are continuously working towards a better customer experience. This includes agile development that takes the customer into account, as well as actively seeking and providing feedback through regular service supplier meetings, project final reports, satisfaction surveys, and by developing our customer communication and always listening with a sensitive ear.

We optimize the use of time and resources through modern architecture and efficient tools, while actively developing the skills of our employees. Reliability is the cornerstone of our industry, and we strive to demonstrate our trustworthiness by listening to our customers and offering only services that meet their needs, ensuring the successful completion of projects, and delivering top-quality service built upon them.

Skilled and well-being staff

The key asset of ALM Partners is our skilled and committed personnel. The trust of our customers is made possible through our satisfied, motivated, and continuously developing staff. The principles of ALM Partners' personnel management are based on the company's values and the desire to succeed together. For this reason, taking care of the professional skills, adequacy, and meaningfulness of our staff's work, as well as enabling individual development, have been and will continue to be part of our responsible operations.

Our strong growth, as well as the hybrid working model we use, have both required and enabled a more diverse investment in our employees. Our personnel's employment and remuneration comply with the financial sector's collective agreement. Our personnel are comprehensively insured, and we offer our employees a wide range of occupational health and dental care, as well as sports and cultural benefits, ergonomic guidelines, team refreshment days, and shared events of our company.

With the hybrid working model, we want to take into account remote workers even better. When recruiting, we have no geographical boundaries, and everyone has been able to work from home if they wish. As a general principle, employees are free to choose whether to work remotely or at the office. HR and occupational health help employees with ergonomics issues, and we carry out checks at regular intervals to maintain employee well-being. We also support remote work in terms of equipment and supplies delivered to the home. We offer every employee the opportunity to acquire an electric desk for remote work. In addition, employees can request equipment for home use, such as a second monitor and a docking station.

The commuter bicycle benefit introduced in 2022 has been continued. Commuting by bicycle is an environmentally

friendly option, and by encouraging employees to cycle to work, we promote an active lifestyle, which in turn helps us strive for a sustainable future.

Our work community is relaxed and communal. Our good team spirit carries over into our free time, a good example of this being our active Discord channel, board game nights, and various sports events, which we enthusiastically participate in. Our employees have the opportunity to be active in organizing leisure activities. If we don't yet have suitable leisure activities, we happily welcome new ideas.



Environment

The hybrid work model enables remote work, and we offer our employees a commuter benefit for using public transportation. With established remote meeting practices, the need for commuting is reduced.

Environmentally significant actions in 2024:

- In preparing for the renewal of our office lease in Helsinki, we have taken into account and plan to influence the environmental impact of the selected property. This includes aiming for a significant environmental certification (such as BREEAM or LEED), with a focus on energy efficiency, waste recycling systems, and accessibility by public transportation.
- Endpoint device lifecycle management and recycling are key areas in IT management for companies and organizations. They help optimize device usage, reduce costs, and promote environmental sustainability. ALM Partners has previously implemented a lifecycle management service for workstations, we expanded its scope in 2024 to also cover mobile devices.

Our goals for 2025

We are developing a process to enable measurement and reporting in accordance with the applicable standard starting in 2026.



Staff well-being and professional development

We want to enable our experts to learn new things either through new tasks that support learning or through education. At ALM Partners, we offer a lot of training related to both the business and technical side internally. Our own experts act as trainers and, as a rule, anyone can participate freely in each training. In addition, we offer all employees the Coursera learning platform and, if necessary, we also organize external training and coaching as needed. We also promote staff education through certificates and pay bonuses for certificates.

We invest in staff well-being by offering a broader service than statutory occupational health care through Terveystalo. Occupational health is further supported by comprehensive sickness and accident insurance. Mental well-being has become increasingly emphasized and for this reason, ALM Partners offers mental wellbeing services both through occupational health and the Auntie service. The goal is to have well-being employees throughout.





Customer data protection and security

Demonstrating the trust our customers have in us, we serve as a personal data processor in specific client processes. For this purpose, we have appropriate non-disclosure agreements and personal data processing agreements with our customers, as well as instructions related to those provided by our customers. Similarly, ALM Partners has corresponding data processing agreements in place with its own service providers, such as IT service providers. As personal data processors, we are committed to implementing adequate safeguards and appropriate technical and organizational measures, including confidentiality agreements with our personnel, client-specific documentation, guidelines, and training.

Not only do we see our customers' reliable data protection as an intrinsic value, but we also see it as a strategic cornerstone in our future customer acquisition. With this background, we took the following steps in 2024 to further strengthen data protection:

- We formalized the role of the Data Protection Officer (DPO) with the Data Protection Ombudsman, despite there being no mandatory obligation to do so given our current scope of ALM Partners' operations
- We commissioned an external data protection expert to audit our data protection practices and documentation
- We acquired a system from an external provider to support our data protection work
- We acquired a system from an external provider to support our data protection work
- We appointed a senior executive responsible for data protection.

Our goals for customer data protection in 2025

- We are developing data protection documentation based on the improvement areas identified in the audit
- We are increasingly integrating the processor's data breach management process into ALM Partners' data security breach management process
- We are finalizing the implementation project of an external data protection system

ALM Partners values its customers and always adheres to confidentiality agreements with extreme precision. In our operations, we comply with the EU's General Data Protection Regulation (GDPR), good banking and insurance practices, as well as a wide range of data protection requirements and standards.

We have wanted to ensure the confidentiality of customer information by all means. We have modern and appropriate technical, organizational, and administrative procedures in place to protect all the information we hold from loss, misuse, unauthorized use, disclosure, alteration, or destruction. We regularly organize training for staff on data security, personal data, and privacy, and we continuously develop IT solutions to secure information.

The ability to detect data security has improved significantly over the past year, and we continue

to increase it and also the ability to react. We have established a CSIRT, i.e., Computer Security Incident Response Team, which coordinates, among other things, the repair and management actions of the case, as well as external, internal, and official communication in the event of a data security event. We actively cooperate with our customers to improve both customer and our own safety.

To support the CSIRT, we are procuring an external Security Operations Center (SOC) as a service, which operates 24/7/365. Outside of working hours, any potential security incidents are detected by the SOC service provider, who will initiate actions to investigate and mitigate the incident. Relevant information about the incident is shared with the CSIRT team as needed. If the incident is deemed critical in severity, the CSIRT team will be activated even outside of working hours. In the event of a critical incident, the CSIRT team will also communicate with supervisory authorities and affected customers.

We started the implementation project of the Information Security Management System (ISO/IEC 27001:2022), which will guide our operations according to the good and data security-enhancing practices required by our customers and the standard. In addition, we have appointed our own data protection officer and drawn up operating instructions for

possible data breaches. Additionally, we have appointed our own Data Protection Officer and prepared operational guidelines in case of potential data breaches. During 2024, we have not been informed of any data breaches in the processing of our customers' or ALM Partners' personal data.

In line with the ISO/IEC 27001:2022 standard, we are implementing an information security management system (ISMS). ISMS creates a centralized overview and a foundation for proactive risk management, including asset registers, incident response plans, and business continuity plans. This standard also facilitates compliance with DORA regulations. Banks are placing requirements on ALM Partners that are based on the DORA regulation. The requirements and controls defined in the ISO/IEC 27001:2022 standard largely cover the obligations set by DORA. Additional elements introduced by DORA are managed through the continuous improvement process of ISO/IEC 27001:2022.

We have noted that laptops remain usable for a longer period than the prevailing industry standard, which for leasing agreements is usually a three-year period. We continue to lease laptops for longer periods and currently around 22% of our laptops are under extended lease agreements. Through this, we aim to reduce the use of natural resources.

Economic responsibility and good governance

In accordance with good corporate governance, our operating methods essentially include clear and systematic decision-making processes that clarify responsibilities, avoid conflicts of interest, and ensure risk management and the transparency of our operations. Operating in accordance with ALM Partners' values requires the adoption of good governance practices in all our business. We want to ensure that our company is as well-managed and led as possible.

Power and responsibility distribution: In accordance with the principles defined in the governance requirements, ALM Partners' board has overall responsibility for good governance throughout the group.

General meeting: The highest decision-making body is the general meeting, where shareholders exercise their voting rights and decisions are made on matters such as the financial statements, dividends, the election of board members and auditors, and the remuneration of board members and auditors.

Board: ALM Partners' board is responsible for the company's administration, organizing its operations in an appropriate manner, and representing the company. In 2024, ALM Partners' board had seven members, six of whom were external board members.

Management team: In 2024, ALM Partners' management team consisted of the CEO and seven responsible managers representing different business areas. In addition, the management team's work was supplemented by representatives of HR and ICT functions as required by the topics.

Following the audit period, the board approved a Code of Conduct in 2025, providing the management with guidelines for implementing corporate responsibility at ALM Partners. The Code defines the principles for responsible business practices at ALM Partners, particularly in relation to the environment, social responsibility, and good governance.



Our goals going forward

During 2025 ALM Partners will begin implementing the guidelines defined in the board-approved Code of Conduct, including:

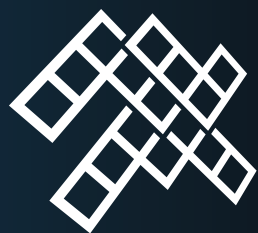
- Integrating sustainability efforts more closely into ALM Partners' ongoing governance and management structure
- Setting concrete sustainability targets for 2026 that are in line with the new Code of Conduct
- Further developing internal and external sustainability reporting, including the evaluation, selection, and planning of the implementation of reporting standards
- Establishing an external whistleblowing channel
- Reviewing current documentation in light of the new Code of Conduct
- Identifying, prioritizing, communicating, and implementing the necessary policies, responsibilities, guidelines, and training related to business ethics, environmental matters, supply chain management, and labor and human rights.

In 2025, we will continue our determined work across all our target markets in line with our growth objectives. We also plan to recruit new top-level experts who will contribute to building a stable foundation for our society.

The development of internal communication will support our personnel during rapid growth and will become an essential part of our evolving work environment. Our goal is to ensure that everyone has equal opportunities to both share and receive information within the company. This aims to strengthen inclusion, fairness, agility, and mental well-being.

Regarding our personnel, our primary goal is to maintain absence levels clearly better than the industry average. This means we will continue to invest in the well-being of our employees both physically and mentally.





ALMPARTNERS

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