



N°RRA

Sustainability Report

2025

NORRA

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Brief notes on the report

The year 2025 has marked a major shift in regulations concerning sustainability reporting. The EU has introduced several changes to sustainability reporting regulations, increasing uncertainty about reporting obligations, especially for companies the size of Norra.

Under the legislation in force at the beginning of 2025, Norra was required to report for the first time in 2026 in accordance with the Corporate Sustainability Reporting Directive (CSRD). In 2025, the regulation was amended to postpone Norra's reporting obligation by two years. Later in 2025, proposed amendments indicated that the

reporting obligation under the Corporate Sustainability Reporting Directive may not apply at all to companies of Norra's size. Due to these changes, there was no official guidance available on a sustainability reporting framework appropriate for companies like Norra when the Sustainability Report was being prepared.

However, based on market practice and stakeholder expectations, Norra has chosen to adopt a proactive and transparent approach to sustainability reporting. The 2025 Sustainability Report is Norra's first sustainability report, prepared on a voluntary basis with reference to

the Corporate Sustainability Reporting Directive and using the European Sustainability Reporting Standards (ESRS) where relevant. Norra's double materiality assessment forms the basis of the Report. This assessment defines the key themes for reporting and ensures that all material content requirements are covered as comprehensively as possible.

In 2026, Norra will reassess its use of the reporting framework, considering the legislation then in force, official recommendations, and the reporting level most suitable for the company's operations.

An outstanding work community results in outstanding aviation

Norra is a Finnish airline specialising in safe, high-quality, and responsible regional flight operations for other airlines.

In 2025, Norra employed 749 aviation professionals. Our operations rely on strong collaboration, agility, and high expertise.

50,000+

We operate more than 50,000 flights each year

Slightly over 3 million Finnair customers fly with us.

24

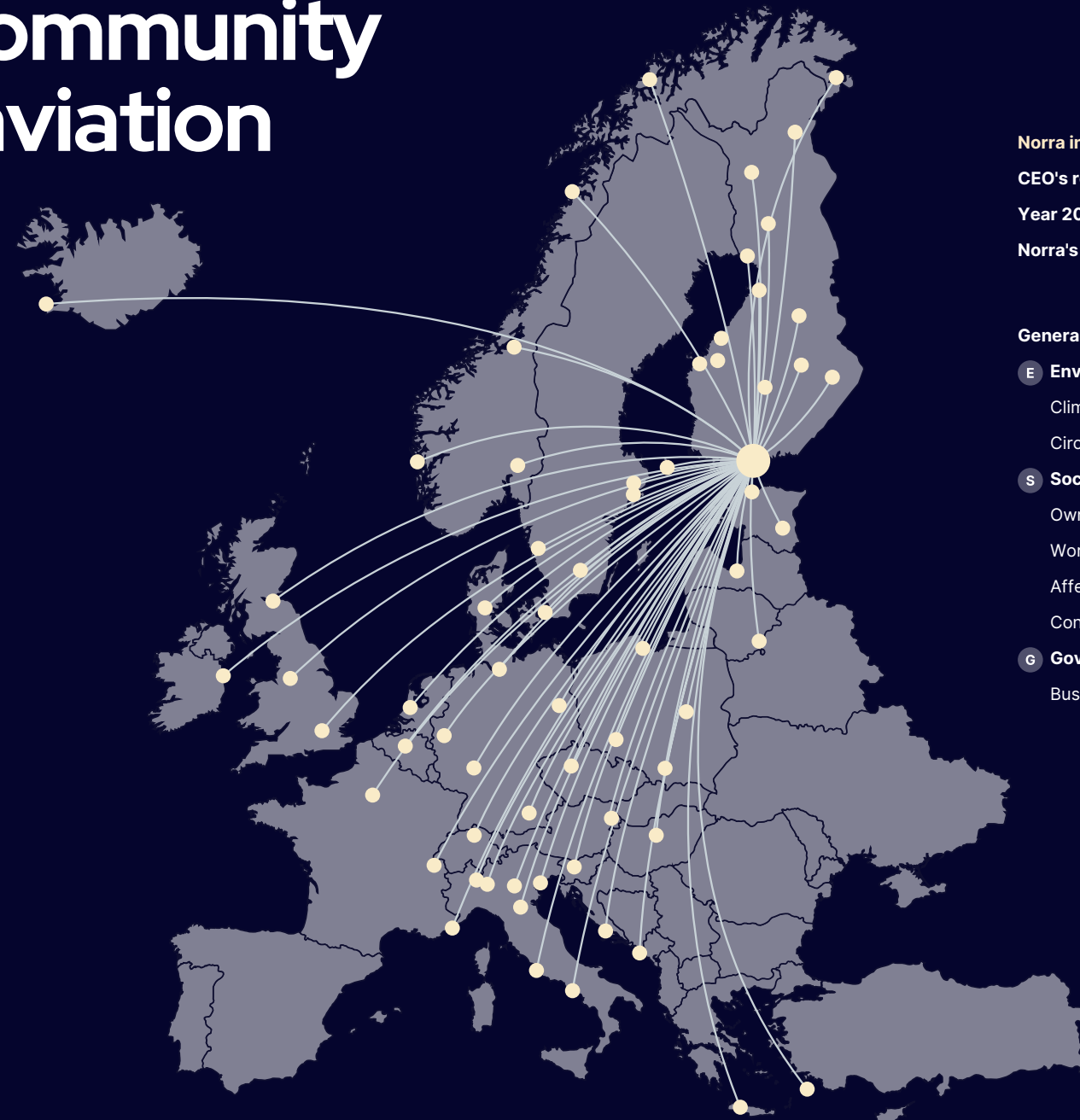
Fleet size

In 2025, our fleet included 12 agile ATR 72 turboprop aircraft and 12 high-performance Embraer 190 jets.

749

In 2025, we employed 749 aviation professionals

We do things properly and in good spirits, aiming to build an outstanding airline.



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The year 2025 was a year of focused development

The year 2025 marked significant strategic, operational, and cultural development for Norra. We deepened our commitment to a people-centred approach and reinforced our goal to build an enthusiastic and committed team, enabling an excellent passenger experience every day. Our values – camaraderie, accountability, and the right to strive for the outstanding – form the core that guides us, even in our demanding operating environment.

A reliable partner and a vital part of Finland's air transport system

In 2025, we operated nearly half of Finnair's flights. We supported the continuity of Finland's air connections and helped connect Finland efficiently to the world. Our work strengthened both regional vitality and international links. Our operational performance – including regularity, punctuality, and high utilisation – showed our team's ability to operate efficiently under both normal and exceptional conditions. Our high-quality operations were also evident in the satisfaction of our passengers and partners, which stayed strong despite the year's challenging moments.

Early 2025 brought significant challenges to the aviation sector when domestic industrial actions impacted the whole Finnish aviation community. These industrial actions caused hundreds of flight cancellations and delays at Finnair, also impacting Norra. Although these external challenges put pressure on our operations, our dedicated personnel and strong cooperation enabled us to respond quickly and flexibly.

Safety and quality

In 2025, Norra became a full member of the International Air Transport Association (IATA). Membership strengthens our position within the international aviation community, enhances our situational awareness, and supports the ongoing development of our management system.

In September 2025, the International Air Transport Association conducted a comprehensive biennial operational audit of our company. As a result of the audit, Norra's IATA Operational Safety Audit (IOSA) certificate was renewed. The certificate is an important and tangible proof that our operations are safe, efficient, and of high quality.

Our personnel – the cornerstone of our operations

One of the most significant achievements in 2025 was the People and Culture Airline Award granted to Norra by the European Regions Airline Association (ERA). The recognition particularly emphasised Norra's people-centred strategy, which focuses on employee well-being, engagement, and ongoing development. The judging panel stated that this strategic direction has made Norra a benchmark among European regional airlines. The award was primarily based on Norra's ability to create a culture where employees genuinely contribute to the company's development and their voices are heard in decision-making.

As part of our employee-focused strategy, we continue to invest in training, safety, and a sense of community. This helps us ensure that we have skilled and motivated employees ready to meet future challenges.



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Our operations are safe, efficient, and high-quality

Important steps towards long-term stability

In 2025, we agreed on terms of employment with all personnel groups for multiple years ahead. This provides Norra with a strong, stable foundation for planning growth, developing operations, and building the future with greater predictability and long-term focus.

A sustainable future

Norra aims to play an active role in developing sustainable solutions for the aviation industry. We collaborate closely with Finnair and other stakeholders to find future solutions that promote more sustainable aviation, safe operations, and efficient regional air traffic. We view sustainable development as a long-term, collective direction, rather than a single project. Operating responsibly is central to our strategy. We are committed to advancing more sustainable air traffic, people's well-being, and good governance as well as sound financial management. Our values – camaraderie, accountability, and the right to strive for the outstanding – guide us in building a sustainable business. At Norra, we advance our sustainability by recognising our role as Finnair's strategic partner.

A thank you and looking forward

I want to thank everyone at Norra for 2025. Your dedication, expertise, and teamwork have formed the foundation of our success.

Thanks also to Finnair and all our other partners and stakeholders. Together we deliver outstanding, safe aviation.

The achievements of 2025 create a strong foundation for future growth together.

Juha Ojala

CEO, Norra



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Year 2025

Highlights

The year 2025 marked significant strategic and cultural development for Norra.



Implementing Norra's new strategy

The year 2025 was a significant year of transition for Norra, when we ambitiously put into practice our new strategy, approved in autumn 2024. The core of the strategy is a strong focus on our work community and the success of every employee.

The comprehensive implementation of the strategy directed all development efforts throughout the year. A key principle has been to encourage every Norra employee to achieve their best results as part of an inspiring and motivated team. This mindset has influenced every aspect of our operations – from management practices and internal communications to employee well-being, ongoing learning, and a stronger sense of community.



Norra received the ERA People and Culture Airline Award 2025

Norra received the People and Culture Airline Award 2025 from the European Regions Airline Association (ERA). This recognition was awarded for the company's outstanding commitment to its employees and its people-centred strategy, which emphasises the key role of personnel and culture in Norra's success and growth.



Finnair has decided to expand its cooperation with Norra

At the end of 2025, Finnair announced its plans for growth. By increasing the frequency of its European route network, Finnair aims to strengthen the feeder traffic required for long-haul operations and provide its customers with new flight connections.

Finnair plans to increase Norra's capacity over the next few years.

We want to ensure that the transition to increased capacity is managed carefully and with high quality – safety, quality, and punctuality will continue to be the cornerstones of our operations, as set out in our strategy.

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Norra's Sustainability Framework



Norra's material sustainability topics			Primary actions and targets	Vision and long-term objectives
E	Environmental sustainability	Climate change	<ul style="list-style-type: none"> Improving energy efficiency Avoiding and reducing greenhouse gas emissions Improving the accuracy of greenhouse gas emissions data Setting, refining, and validating climate targets 	<ul style="list-style-type: none"> Climate neutrality (2050) Managing nature-related impacts
		Resource use and circular economy	<ul style="list-style-type: none"> Improving resource efficiency Promoting circular economy 	<ul style="list-style-type: none"> Promoting circular economy
S	Social sustainability	Own workforce	<ul style="list-style-type: none"> Developing employee training and recruitment practices Developing workplace solutions to enhance employee well-being Regularly gathering insights from employees Human and labour rights assessments and corrective actions when required 	<ul style="list-style-type: none"> Competitive skills and competence Outstanding employee experience Respect for human and labour rights
		Workers in the value chain	<ul style="list-style-type: none"> Strengthening sustainability criteria for suppliers Developing cooperation to ensure fair working conditions and terms of employment 	<ul style="list-style-type: none"> A responsible and transparent value chain Long-term partnerships
		Consumers and end- users	<ul style="list-style-type: none"> Ensuring safe and high-quality services Developing service design to improve accessibility and inclusiveness Monitoring passenger satisfaction and developing services based on feedback 	<ul style="list-style-type: none"> A safe, transparent, and responsible passenger experience Outstanding passenger satisfaction
		Affected communities	<ul style="list-style-type: none"> Ensuring regional connectivity by linking Finnish cities to a global route network Strengthening support for local business, tourism, and business travel Evaluating and mitigating negative environmental and social impacts 	<ul style="list-style-type: none"> A contributor to regional economic vitality A long-term enabler of Finland's domestic and international connectivity
G	Governance	Business conduct	<ul style="list-style-type: none"> Managing sustainability-related impacts, risks, and opportunities Ensuring compliance with laws and commitments 	<ul style="list-style-type: none"> Value-based policies

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General principles for preparing the Sustainability Report

Company information

Nordic Regional Airlines Oy (Norra) is a Finnish airline specialising in regional air transport. The company provides scheduled commercial air transport under the ACMI business model and delivers high-quality ground operations.

Nordic Regional Airlines Oy is part of the Norra Group, which consists of the parent company Nordic Regional Airlines AB as well as the subgroup Nordic Regional Airlines Holding Oy and its subsidiary Nordic Regional Airlines Oy. The parent company of the Group, Nordic Regional Airlines AB, is a joint venture owned by DAT Holding A/S (60%) and Finnair Plc (40%). In financial year 2025, Norra's main customer was Finnair Plc. The company has a valid Purchase Traffic Agreement and a Ground Handling Agreement with Finnair.

The 2025 Sustainability Report is Norra's first sustainability report. The Sustainability Report covers Nordic Regional Airlines Oy, unless otherwise specified in the reported information. The reporting period is the same as in the financial reporting, i.e. 1 January 2025 – 31 December 2025.

General basis for preparation

Norra's 2025 Sustainability Report is not prepared in accordance with the EU Corporate Sustainability Reporting Directive (CSRD). However, the Sustainability Report is prepared with reference to the European Sustainability Reporting Standards (ESRS) reporting framework. We will supplement and develop the content and structure of the report in the years to come. The 2025 Sustainability Report is Norra's first, so the report does not include comparative data. EU taxonomy reporting requirements have not been considered.

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The reported sustainability topics and key figures are based on Norra's Double Materiality Assessment (DMA), which was first carried out in 2024 and updated in 2025. The materiality assessment has been used to select the reporting requirements most relevant to the company's operations and stakeholders. The identification and assessment of material impacts, risks, and opportunities have also considered both the upstream and downstream parts of Norra's value chain. Norra's Management Team approved the changes to the materiality assessment and the sustainability topics identified as material in 2025. Reporting based on these started the same year. Details of the

materiality assessment and its results are provided in the section [Processes to identify and assess material impacts, risks, and opportunities](#).

No information or datapoints have been omitted on the grounds that they concern intellectual property, know-how, or innovation outcomes.

The 2025 Sustainability Report is not assured by an external sustainability assurance provider.

Disclosures in relation to specific circumstances

The reporting principles and the impact of specific circumstances on preparing the Sustainability Report are described in detail alongside the relevant topics.

Time horizons

Norra has applied the time horizons defined in the ESRS 1 General Requirements standard. The short-term time horizon means the reporting period. The medium-term time horizon covers the period from the end of the short-term time horizon up to five years. A long-term time horizon is defined as a period exceeding five years. Any exceptions to the application of these time horizons are indicated alongside the relevant datapoints.

Value chain estimation

Norra has reported some environmental data on value chain-related Scope 3 GHG emissions, using indirect sources and estimates. More details about value chain estimation for greenhouse gas emission calculations are in the environmental sustainability section, under [Reporting principles for greenhouse gas emission metrics](#).

Sources used in estimation and uncertainty of the result

Norra gathers the data for each quantitative metric by applying material reference frameworks and guidelines, along with its own internal information gathering methods. Measurement uncertainty is typically greater when data rely on future events, estimates, or indirect sources, or when information gathering includes several manual steps that may introduce a risk of human error. If a specific metric or datapoint involves estimates, assumptions, measurement uncertainties, or other interpretations, these are disclosed alongside the relevant information.

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Sustainability governance

Norra's Sustainability Report presents information on the governance of sustainability, including the roles of the Board of Directors and the Management Team.

Composition and diversity of Norra's governance bodies

Norra's governing bodies are the company's Board of Directors and the Management Team.

Norra's Board of Directors manages the company and ensures its operations are properly organised. The main duties of the Board of Directors are set out in the Limited Liability Companies Act, the Articles of Association, and the Board of Directors' Rules of Procedure. The Board of Directors also ensures that the company's accounting and financial oversight are properly organised. In 2025, Norra's Board of Directors comprised four regular members. All members of the Board of Directors remained independent of the company throughout the financial year. The composition of the company's Board of Directors stayed the same throughout the financial year. Jaakko Schildt served as chairman of the Board of Directors, with Christine Rovelli, Jesper Rungholm, and Robert Rungholm as full members. None of the members of the Board of Directors were employed by Norra during the financial year.

In 2025, Juha Ojala was the CEO of the company. Norra's CEO is responsible for the company's day-to-day management, following the instructions and regulations set by the Board of Directors. The CEO ensures that the company's accounting complies with the law and that financial management is organised reliably.

Norra's Management Team consists of 10 members, including the CEO. The team is responsible for Norra's operational management and for developing the company.

Members of Norra's governance bodies

	Board of Directors		Management Team	
	Men	Women	Men	Women
Count	3	1	8	2
Percent	75%	25%	80%	20%

Management expertise in Norra's business operations

The members of the company's Board of Directors have broad and long-standing experience in both the aviation and financial sectors. The board members' experience profile encompasses both operational and strategic aspects of air transport, the industry's regulatory and market conditions, as well as key areas in corporate finance and financial management. The combined expertise of the Board members enhances the Board's ability to assess changes in the company's operating environment, steer the company's strategic direction, and make consistent decisions that support the company's long-term objectives.

The members of the company's Management Team have broad and varied experience in the aviation industry and in business management. The Management Team's expertise includes flight safety, operational leadership and development, industry regulatory and authority requirements, and integrating sustainable development principles into the company's operations and strategic planning. The Management Team has extensive experience in developing large-scale operational functions, managing risks, and collaborating with the company's key stakeholders. This combined expertise provides a strong foundation for the Management Team to implement the company's strategy, ensure operational safety and efficiency, and advance the company's long-term goals and operational performance.

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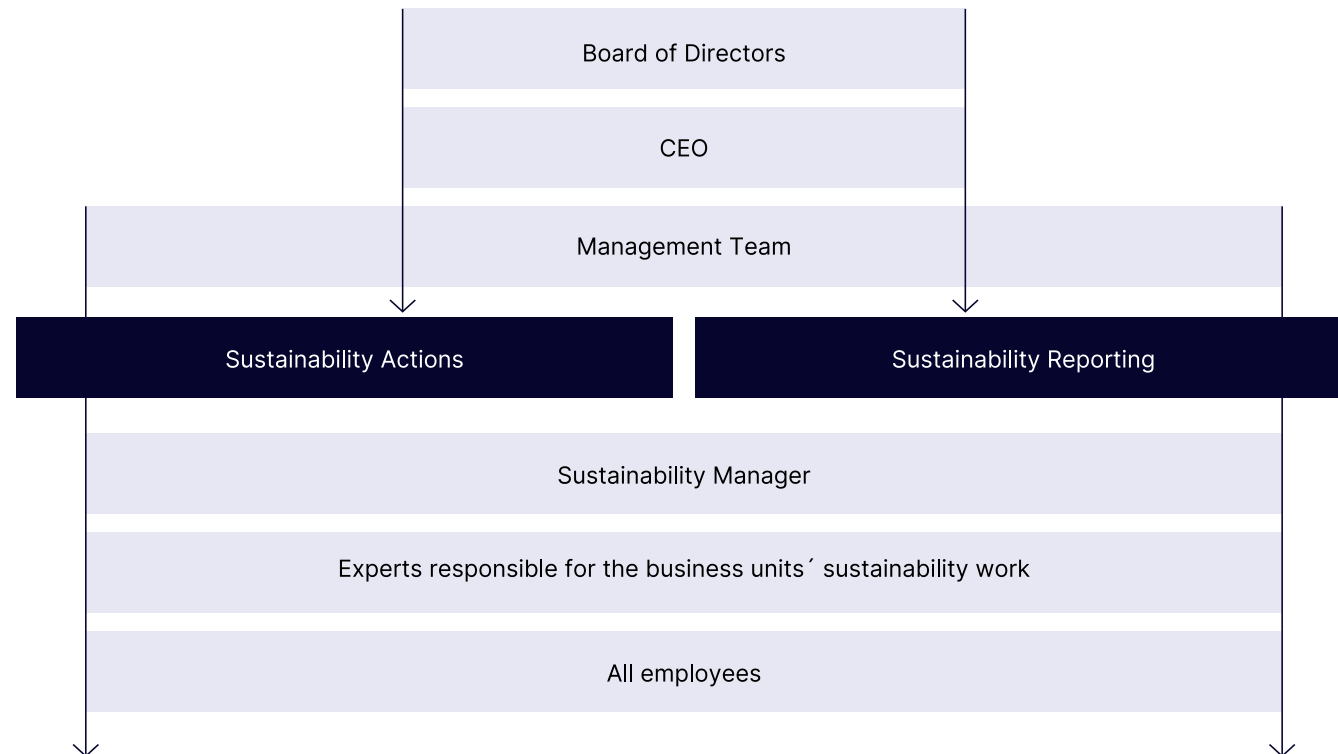
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Governance structure for sustainability and reporting

Sustainability governance

The diagram provides a comprehensive overview of Norra's sustainability management model. It is complemented by the following description, which details the sustainability governance structure as well as the associated roles and responsibilities.



Norra's Board of Directors

Norra's Board of Directors oversees the company's administration and ensures operations are properly organised. Accordingly, Norra's Board of Directors also holds the highest decision-making authority for the company's sustainability matters, covering all aspects of environmental, social, and governance (ESG).

Norra's Management Team

Norra's ten-member Management Team, led by the CEO, ensures that the company conducts its business according to Norra's values and policies. The Management Team is responsible for setting sustainability targets and defining strategic priorities. The Management Team also takes part in assessing material impacts, risks, and opportunities as part of the double materiality assessment.

The Management Team provides strategic guidance and advice to the company's Sustainability Manager. The Management Team regularly receives updates on Norra's sustainability initiatives from the Sustainability Manager. In addition, members of the Management Team have expertise in Norra's material sustainability topics, impacts, risks, and opportunities, drawing on their roles and knowledge.

In 2025, Norra's Management Team meetings addressed the following sustainability-related topics in reviews presented by company management, the Sustainability Manager, and other experts:

- the company's policies and their updates
- developing employee well-being
- developing an ethical work and operating environment
- promoting diversity and equity
- work safety
- data security
- modernising working life

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- sustainability reporting and changes in the regulatory environment

Norra's Sustainability Manager leads the development of the company's sustainability efforts. This includes preparing the sustainability strategy and programme, monitoring their implementation, gathering and analysing material sustainability information, and managing sustainability reporting. The role also involves delivering sustainability communications and training, developing sustainability processes and guidelines, monitoring regulatory changes and implementing requirements, and working closely with the business and stakeholders. The Sustainability Manager reports to the CFO.

Sustainability reporting

Norra's Management Team reviewed and approved the Sustainability Report prior to its publication. The Sustainability Manager and specialists from different departments have taken part in defining, developing, and reviewing the scope of reporting. The company's Sustainability Manager has been responsible for compiling and formatting the reported information. Representatives from Human Resources, Finance, and other company functions have contributed to producing the data.

Statement on due diligence

Norra's due diligence process is part of its sustainability management. The aim is to identify and minimise negative impacts of the company's operations or value chain on human rights, the environment and communities, and to maximise positive impacts. The process consists of the following components:

- Identification: Norra uses risk analyses, stakeholder consultation, and information and observations from daily

operations to identify significant sustainability impacts, risks, and opportunities.

- Assessment: Identified issues are prioritised in accordance with defined criteria, such as severity and likelihood.
- Actions: Based on the previous steps, actions are defined, such as projects carried out with partners and any required follow-up studies.
- Monitoring: Necessary monitoring is established for the measures to track progress and adjust actions as needed.

Risk management and internal controls over sustainability reporting

Norra's Management Team is responsible for quality control of sustainability reporting. In 2025, Norra prepared its first Sustainability Report and established a process that identified risks, including challenges with data completeness and integrity, as well as unclear roles and responsibilities. To address these, Norra introduced an internal governance model that clearly defines the roles and responsibilities of everyone involved in sustainability reporting. This model ensures timely and proper participation in the reporting process.

Norra's Finance Department ensures that financial and sustainability information is reported accurately and on time, and that reporting requirements are met. The Finance Department supervises data collection and prepares and publishes Sustainability Reports. Representatives from different departments support the work by providing the data for reporting.

Strategy, business model, and value chain

Business model

Norra is a Finnish airline specialising in regional air transport. The company provides scheduled commercial air transport

under the ACMI business model and delivers high-quality ground operations. In 2025, Norra's main customer was Finnair Plc. The company has a valid Purchase Traffic Agreement and a Ground Handling Agreement with Finnair.

Norra's business forms an integral part of Finnair's route network and service portfolio. In 2025, Norra operated a fleet of 24 aircraft within Finnair's route network under the Purchase Traffic Agreement. In 2025, Norra's fleet comprised 12 ATR 72 turboprop aircraft and 12 Embraer 190 jet aircraft. The aircraft are leased from Finnair Aircraft Finance Oy and operate on flights to and from Helsinki-Vantaa Airport. In this way, Norra helps link Finnair's domestic and European route network to North America, Asia, and the Middle East.

In 2025, Norra employed 749 aviation professionals.

Strategy

Norra specialises in delivering safe, high-quality, and sustainable regional flight operations for its partners. The company's strategy is built on a clear identity and values – camaraderie, accountability, and the right to strive for the outstanding – which guide daily operations, especially in terms of safety, quality, and sustainability.

Norra's small and agile organisation enables it to respond quickly to changes in the operating environment and to maintain air links in Finland and Europe that are vital for society. As Finnair's strategic partner, Norra links one of the world's northernmost air traffic hubs to global destinations, supporting the region's business, community, and international connectivity.

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Norra continuously improves its operations in the areas of environmental sustainability, social sustainability, and good governance. This requires effective action to reduce climate impacts and to promote personnel well-being and equity. Sustainability work relies on close collaboration with both internal and key external stakeholders, particularly Finnair.

Norra's most significant environmental impacts result from the greenhouse gas emissions produced by its operated aircraft. Norra supports Finnair's emission reduction targets, aiming to significantly lower flight emission intensity by 2033 compared to 2023. Finnair and Norra must act to increase the use of sustainable aviation fuel (SAF), enhance the energy efficiency

of their fleet, and continuously optimise operational performance. Achieving these targets demands substantial investments and close stakeholder collaboration to deliver the required systemic change.

Finnair and Norra identify various uncertainties and risks related to these actions. These include, in particular, the availability and price trends of sustainable aviation fuel, the procurement of modern aircraft, and industry regulation. These factors may influence how the companies carry out their plans and the related timelines.

Norra's operations exert a significant impact on social sustainability – especially on its own employees and passengers. The company safeguards the health and safety of its employees and passengers, and advances equality, non-discrimination, and diversity. Norra focuses on developing its corporate culture, enhancing employees' skills, and creating a positive employee experience.

Norra's value chain

Flights operated by Norra are a key component of Finnair's business model. Norra's regional flights provide frequent and reliable connections from domestic and nearby airports to Helsinki, enabling passengers to continue seamlessly to Finnair's extensive route network, as well as those of the Oneworld Alliance and international joint ventures.

Within the value chain, Norra adds value for Finnair by maintaining operational reliability and delivering a high standard of service. Norra acquires many of the products and services it needs for its business from Finnair, which makes Finnair Norra's so-called Tier 1 supplier.

Norra also works closely with other units of the Finnair Group, numerous maintenance and ground operations suppliers, authorities, and airport operators to ensure safe and punctual flights.

The upstream and downstream ends of Norra's value chain, along with the position of Norra and its material impacts, risks, and opportunities within the value chain, are presented in the figure [Norra's Value Chain](#).

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→ Values

Camaraderie

Accountability

The right to strive for the outstanding

→ The idea

An outstanding work community results in outstanding aviation

We are Finnair's strategic partner, driving customer experience forward. Together, we ensure the smooth operation of Finnish society and advance aviation excellence.

→ What we aim for

Europe's best regional airline

Strategic focus points

- 1 An outstandingly excited and committed team
- 2 An outstandingly agile and sustainable airline; and, as a result,
- 3 An outstanding passenger and customer experience

Safety

Sustainability

Agility

Operative excellence



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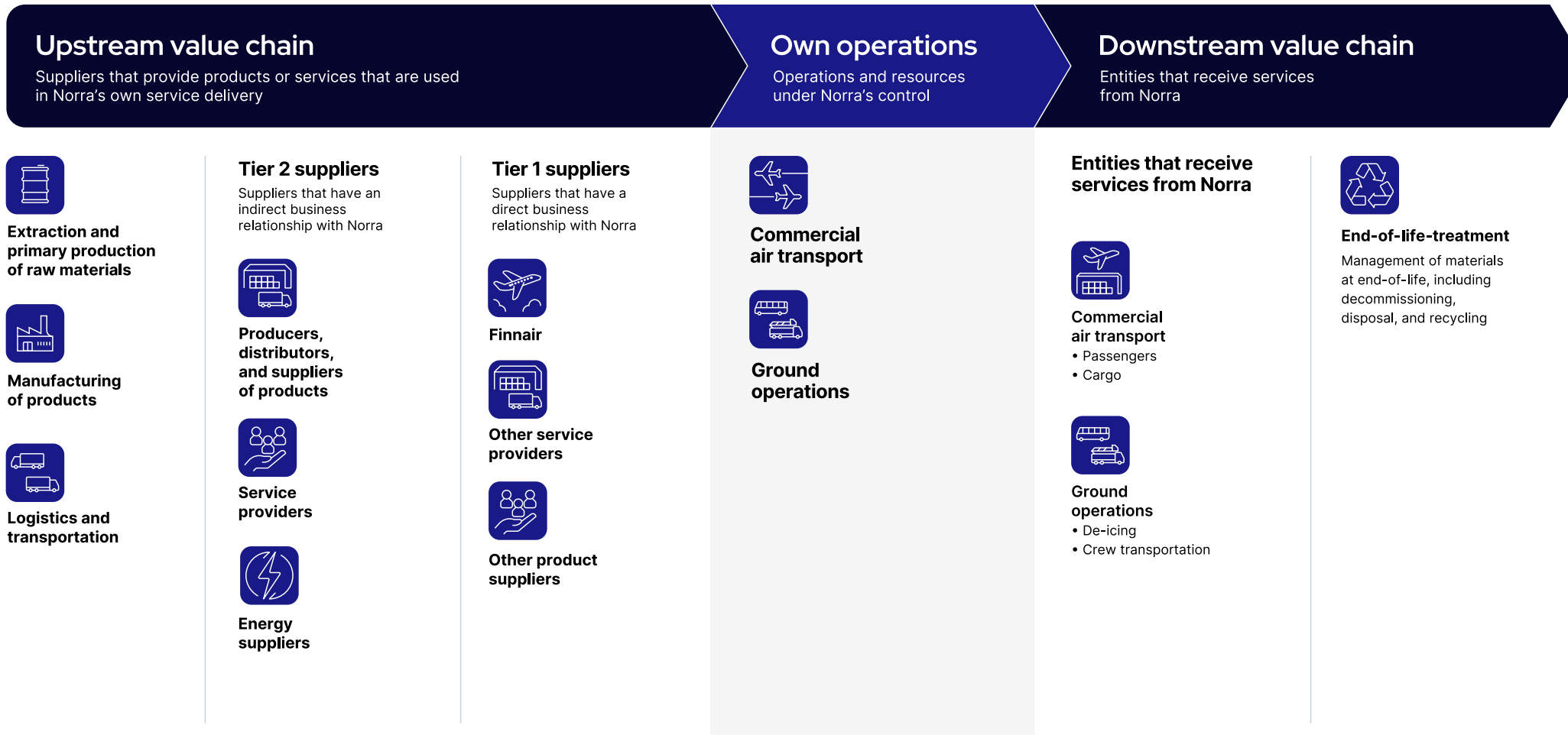
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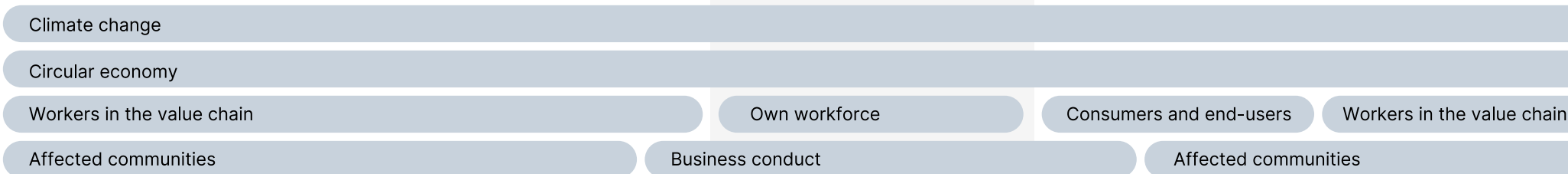
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Interests and views of stakeholders

For Norra, sustainability means taking economic, social, and environmental responsibility fully into account in its business operations. Norra continuously evaluates the perspectives of its main stakeholders and is prepared to adjust its activities and strategy to meet evolving external expectations.

Continuous dialogue with stakeholders is important to Norra. It enables Norra to develop responsible operating practices and assess whether the current business strategy meets stakeholder needs or requires changes.

Norra maintains an up-to-date understanding of stakeholder expectations by engaging actively with business units, the Management Team, and the Board of Directors. Through this dialogue, Norra identifies the key themes, targets, and potential impacts that are important to stakeholders, and how these may affect the company's sustainability work and business strategies.

In 2024, Norra conducted its first double materiality assessment, with stakeholder views playing a central role. Based on the assessment, Norra defined the material sustainability themes for the company's operations. These themes will direct the future priorities of its sustainability work. A more detailed description of the assessment appears in the section [Processes to identify and assess material impacts, risks, and opportunities](#).

Norra did not change its business strategy as a result of the double materiality assessment. On the next page, the section [Stakeholder engagement](#) summarises Norra's main stakeholders and explains how the company incorporates their expectations into its strategy and business model.



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Stakeholder engagement

Stakeholder	Stakeholder involvement and engagement	Purpose of interaction	Taking the results of the interaction into account
Own workforce	<ul style="list-style-type: none"> Recruitment process Onboarding process Employee surveys Personnel events and internal communication Cooperation with occupational safety delegates and union representatives Performance reviews Training sessions Reporting channels 	<ul style="list-style-type: none"> Dialogue and feedback on work, well-being, occupational health, and safety Supporting professional development Engaging personnel in decision-making 	<p>Modifying or creating policies and plans related to own workforce, for example:</p> <ul style="list-style-type: none"> Work community development plan, supervisory work and management Early Support Model Occupational Health Care Action Plan Fatigue Call Action Model Preventing harassment and inappropriate behaviour – at Norra, we treat each other with respect Equality and Non-Discrimination Plan Occupational Safety and Health Action Plan
Customer	<ul style="list-style-type: none"> Meetings and cooperation Contract negotiations Ongoing communication regarding operational issues Joint development and review meetings Reviewing customer feedback Reporting 	<ul style="list-style-type: none"> Ensuring that shared targets and expectations are clear Continuous improvement of service quality, safety, and efficiency Continuous improvement of operational processes Fulfilling contractual obligations and ensuring 	<p>Development actions and improvements are implemented as based on the interaction, for example:</p> <ul style="list-style-type: none"> Developing operating models and processes Specifying operational practices Monitoring and developing shared performance metrics
Passengers	<ul style="list-style-type: none"> In-flight interactions between passengers and Norra crew Social media and website Finnair's customer service channels, feedback, and surveys 	<ul style="list-style-type: none"> Assisting passengers during the journey Feedback and discussion on matters concerning passengers Using feedback to improve services and develop products 	<p>Developing new features for services and applying service design by leveraging internal communications, for example:</p> <ul style="list-style-type: none"> Guidelines Training sessions Information campaigns
Suppliers of goods and services	<ul style="list-style-type: none"> Meetings and cooperation Contract negotiations and contract management 	<ul style="list-style-type: none"> Ensuring compliance and quality Ongoing improvement of operations 	<ul style="list-style-type: none"> In supplier collaboration, we focus on building fair, long-term partnerships, and utilise feedback from interactions to improve our operations.
Affected communities	<ul style="list-style-type: none"> External communication through social media and the website Collaboration with partners and regional stakeholders Helsinki Airport cooperation group for managing aircraft noise 	<ul style="list-style-type: none"> Sharing information with communities and gathering feedback Securing Norra's ability to operate in destination countries and cities Complying with local regulations and statutes 	<ul style="list-style-type: none"> As Finnair's strategic partner, Norra supports regional air traffic and strengthens connections from the provinces to the Helsinki Metropolitan Area and Finnair's international route network. Monitoring noise levels and planning traffic at Helsinki Airport and remote stations
Authorities	<ul style="list-style-type: none"> Dialogue with local, national, EU-level and other international authorities 	<ul style="list-style-type: none"> Ensuring compliance and quality Ongoing improvement of operations 	<ul style="list-style-type: none"> Adaptations and modifications to operating procedures and reporting practices to ensure regulatory compliance.
Partnerships and associations	<ul style="list-style-type: none"> Collaboration with Finnair, Finavia, and Fintraffic IATA and ERA memberships 	<ul style="list-style-type: none"> Sharing information and best practices 	<ul style="list-style-type: none"> Defining a unified approach for advocacy and initiatives

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Processes to identify and assess material impacts, risks, and opportunities

In 2024, Norra conducted its first double materiality assessment. The goal was to identify the most significant sustainability topics related to the company's operations, along with the associated impacts, risks, and opportunities.

The assessment covered both impact materiality and financial materiality. In the first phase, Norra carried out a context analysis to define the background and basis for the double materiality assessment. The aim was to identify the key

sustainability aspects in Norra's operations, its value chain, and the aviation sector, along with their associated impacts, risks, and opportunities. The analysis drew on both internal and public data, sustainability trends in the media, regulation, industry frameworks, industry publications, and benchmarks. Based on the results, Norra prepared a preliminary list of potentially material sustainability aspects. Targeted stakeholder interviews and surveys were then used to supplement this list.

Identified impacts, risks, and opportunities were assessed using a scoring model. The model considered the scale, scope,

remediability, and likelihood of impacts, along with the likelihood and financial significance of risks and opportunities. The assessment also considered different time horizons (short, medium, and long term). Impacts, risks, and opportunities exceeding the defined thresholds were classified as material.

The assessment identified both positive and negative impacts connected to, among other things, the environmental impacts of aviation operations, employee well-being, safety, passenger experience, and responsible business conduct. We identified sustainability issues from the perspective of both Norra's own operations and the value chain.

In 2025, Norra's double materiality assessment was reviewed and updated by the Sustainability Manager. The results for 2025 were then presented to and approved by the company's Management Team.

Norra continuously evaluates the perspectives of its main stakeholders and is prepared to adjust its activities and strategy to meet evolving external expectations. The results of the materiality assessment and the sustainability targets based on them are updated annually and reported as part of Norra's Sustainability Report.

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Material impacts, risks, and opportunities

Environmental sustainability	Type
Climate change	
GHG emissions from own operations and the value chain (Scope 1, 2 and 3)	Negative impact
Fuel and energy consumption in air transport	Negative impact
Risk of increasing regulatory obligations	Risk
Risk of unsuccessful technological transition	Risk
Proactive adoption of sustainable practices	Opportunity
Increasing capital and revenue sources as well as cost savings through sustainability	Opportunity
Circular economy	
The use of virgin raw materials leads to the depletion of natural resources at the upstream value chain	Negative impact

Social sustainability	Type
Own workforce	
A stressful work environment and irregular shift work affect employees' health, well-being and motivation	Negative impact
Enhancing employees' health, well-being and motivation through permanent employment relationships, comprehensive employee benefits, flexible remote-work practices and high-quality crew scheduling	Positive impact
Career development through training and skills-development opportunities	Positive impact
An inclusive work environment that promotes employees' health, well-being and motivation	Positive impact
Risk of declining employer reputation	Risk
Risk of strikes and other work-related disruptions	Risk
A strong employer brand and corporate culture enabled by comprehensive employee well-being	Opportunity
Flexible local bargaining on terms of employment	Opportunity
Workers in the value chain	
Risk of strikes and other work-related disruptions in the value chain	Risk
Affected communities	
Noise pollution from own air transport operations	Negative impact
Contribution to Finland's regional and economic development	Positive impact
Risk of stricter noise reduction regulation	Risk
Consumers and end-users	
Negative impacts on passengers' health and safety	Negative impact
Negative impacts related to failures in punctual departures	Negative impact
Distress and a sense of discrimination due to failure to ensure accessibility	Negative impact
Risk of epidemics and pandemics	Risk

Governance	Type
Corporate culture, policies, and protection of whistleblowers	
Unethical business conduct and violations of principles	Negative impact
Risk of reputational damage from unethical business conduct and violations of principles	Risk
Management of relationships with suppliers	
Preferred partner for suppliers through good and fair relationship management	Opportunity
Information security and cybersecurity	
Risk of data security breaches	Risk

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Environmental sustainability

Climate change



A comprehensive understanding of Norra's climate impacts and active management of them are playing an ever more central role in the company's daily operations and long-term strategic decisions. Work focusing on the fuel and energy consumption of air traffic and ground operations, greenhouse gas emissions, and the environmental impacts throughout the value chain forms the foundation of Norra's environmental sustainability efforts and steers the company towards lower-emission operations. We aim to foster commitment to environmental sustainability across the entire organisation. This approach enables us to take concrete actions that build long-term, competitive and climate-conscious aviation operations for current and future generations.

Material impacts, risks, and opportunities related to climate change

Material impacts, risks, and opportunities related to climate change have been identified as part of Norra's double materiality assessment. The assessment process is described in more detail in the section [Processes to identify and assess material impacts, risks, and opportunities](#).

We have assessed the impacts, risks, and opportunities related to climate change, focusing especially on the fuel consumption of Norra's own flight operations and ground operations, as well as on operational solutions. The assessment has used the company's internal data, industry scenarios, and sustainability regulations concerning the transition to lower-emission aviation.

As an operational airline, Norra faces its most significant climate risks and opportunities in emission reduction measures, including fleet energy efficiency, as well as regulatory changes that could impact operating costs and investment requirements. Norra's own operations directly affect the

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company's climate footprint, so managing climate impacts is a key part of its sustainability efforts.

Norra actively monitors the development of Finnair's transition plan and the related regulatory and market environment. The company is prepared to adjust its operations as the plan progresses and in response to external requirements. Norra also seeks to engage in ongoing cooperation with Finnair and other partners to ensure that the necessary emission reduction solutions are implemented in a systematic and effective manner.

Material impacts, risks, and opportunities related to climate change

Climate change	
GHG emissions from own operations and the value chain (Scope 1, 2 and 3)	Negative impact
Risk of increasing regulatory obligations	Risk
Risk of unsuccessful technological transition	Risk
Proactive adoption of sustainable practices	Opportunity
Increasing capital and revenue sources as well as cost savings through sustainability	Opportunity

Energy	
Fuel and energy consumption in air transport	Negative impact

Policies related to climate change mitigation and adaptation

Norra is committed to continually reducing the environmental impact of its operations and advancing climate change mitigation. We aim to reduce our carbon footprint by increasing fuel efficiency, promoting the use of sustainable aviation fuels, and investigating alternative energy solutions for both aircraft

and ground equipment. We closely monitor environmental legislation and standards in our industry to ensure our operations fully comply with all requirements. In line with these principles, we advance responsible and sustainable practices across our entire value chain.

Energy efficiency

For Norra, energy efficiency plays a central role in reducing climate impacts. Our primary objective is to optimise energy efficiency before we implement any other emission reduction actions. We continuously enhance energy use in both flight operations and ground operations. We systematically monitor energy consumption and continuously assess operations. This approach helps us identify the most important development areas and direct actions where they have the greatest impact. Norra advances energy efficiency by developing operating methods and, for air traffic, by optimising flight profiles. These actions reduce unnecessary energy consumption and support long-term, resource-wise operations. This ensures that we systematically improve our energy use.

Promoting the use of renewable energy

Promoting the use of renewable energy helps Norra move towards lower-emission operations. For flight operations, Norra supports Finnair in using sustainable aviation fuel (SAF) and other renewable energy sources whenever operational and technical conditions allow. For ground operations, Norra is committed to using renewable energy sources whenever this is operationally and technically feasible.

Collaboration with stakeholders is a central aspect of environmental sustainability efforts. Norra closely tracks evolving markets, with a particular focus on energy-efficient solutions. As part of Finnair's strategic network, Norra supports Finnair's sustainability policies and climate targets, and contributes to Finnair's systematic transition towards lower-carbon aviation.

Actions and resources in relation to climate change mitigation and adaptation

Norra serves as Finnair's strategic partner and supports both Finnair's climate targets and actions to cut emissions. The majority of Norra's greenhouse gas emissions come from flight operations, particularly the use of aviation fuel (Finnair's Scope 1 carbon dioxide emissions and Norra's Scope 3 carbon dioxide emissions). In addition, Norra's ground operations use various fuels as well as anti-icing and de-icing agents. For this reason, Norra directs its key climate change mitigation actions, resources, and reporting especially towards these areas.

Improving the efficiency of aviation fuel use

Norra is committed to improving its energy efficiency and advancing the use of sustainable aviation fuel in cooperation with Finnair. Norra aims to reduce carbon dioxide emissions from its flight operations primarily by improving operating procedures and optimising flight profiles.

Norra also recognises that other emissions, such as contrails (non-CO₂), contribute to global warming. The company actively monitors evolving regulations and, together with Finnair, works to support solutions that make proactive management of these emissions possible – including improving information gathering and introducing new operational tools.

Working with Finnair, Norra systematically advances the transition to lower-emission air transport and supports EU-regulated measures that reduce the total climate impact of aviation.

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Metrics for climate change mitigation

Norra has not set separate targets for climate change mitigation. This is because the carbon dioxide emissions from aviation fuel consumption are classified as direct carbon dioxide emissions (Scope 1) from Finnair, our strategic partner. Therefore, Norra's carbon dioxide emissions from air traffic have been consolidated and incorporated into Finnair's comprehensive climate targets.

In 2025, Norra made a strategic decision to comprehensively renew its sustainability work. As part of this sustainability work, Norra committed to begin reporting its own independent metrics and information on climate change mitigation. The year 2025 serves as the base year for this reported information. Norra will use this data to set its own climate change mitigation targets in 2026. Norra has launched independent sustainability initiatives and begun monitoring and reporting sustainability data to more effectively support its strategic partner Finnair in achieving its ambitious climate targets.

Finnair has a cross-functional working group focused on aviation fuel efficiency, with Norra participating. The working group coordinates projects to improve aviation fuel efficiency and thus reduce carbon dioxide emissions from air travel. In 2025, Norra's implemented projects included developing metrics for aviation fuel efficiency, increasing single-engine taxiing in the Embraer fleet, and refurbishing the cabins of Embraer aircraft. The cabin renovation of Embraer aircraft reduced their mass, which improved the fuel efficiency of the Embraer fleet. These savings initiatives reduced aviation fuel consumption by approximately 202 tonnes in total in 2025.

Transition to renewable energy in ground operations

Norra uses diesel, fuel oil, and petrol in its ground support equipment. Norra has used renewable fuel oil since May 2024. In 2025, Norra adopted renewable options as broadly as possible for diesel as well; 34% of the diesel used in 2025 was renewable. In total, 94% of the fuels used in ground support equipment in 2025 were renewable.

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Energy consumption

Norra's energy consumption data includes only the fuel consumption of the company's ground operations. Consumption data for aviation fuel and purchased energy used in Norra's premises are excluded from the energy consumption data, as the company does not have direct control over these. Aviation fuel consumption data is combined and included in Finnair's energy consumption data. Following the same principle, data on purchased energy used in Norra's premises has also been combined and included in the energy consumption data of Norra's landlords. The boundaries for energy consumption data follow the GHG Protocol's Scope 1 and Scope 2 greenhouse gas emission classifications. This approach prevents double counting of energy consumption data between companies.

Energy consumption

Energy Consumption of Ground Operations Fuel	2025
Total fossil energy consumption (MWh)	38
Share of fossil sources in total energy consumption (%)	6.3%
Total renewable energy consumption (MWh)	565
Share of renewable sources in total energy consumption (%)	93.7%
Total energy consumption (MWh)	603

The table contains only the energy consumption data for fuels used in Norra's ground operations. The reported energy consumption figures include fuel energy use, converted to megawatt hours (MWh) when consumption data was only available in volumetric units. The conversions use the calculation method specified in the Carbon Disclosure Project (CDP) guidelines and the factors from Statistics Finland's Fuel Classification 2025, which reflect the national default bio-content shares of fuels.

Energy intensity relative to net revenue

	2025
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/MEUR)*	6.7

*The total energy consumption used here refers to the total energy consumption shown in the "Energy Consumption" table above.

Reporting principles for energy metrics

Energy and energy efficiency metrics are calculated using consumption figures reported by fuel suppliers, based on their invoices. To report fuel energy consumption, we have used the calculation method specified in the Carbon Disclosure Project (CDP) guidelines and the factors from Statistics Finland's Fuel Classification 2025 to convert volume data into megawatt hours (MWh). These metrics do not involve significant assumptions.

For calculating energy intensity based on net revenue, Norra uses net revenue for the financial period as defined by Finnish Accounting Standards (FAS).

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

The greenhouse gas emissions data reported below show Norra's direct and indirect impacts on climate change. The table [Description of activities significant to Norra, calculation methods, assumptions used, and emission factors](#) explains how Norra assesses the significance of its emission sources. It also details the calculation methods, assumptions, and emission factors used in Scope calculations.

GHG intensity per net revenue

	2025
Total GHG emissions (location-based) per net revenue (tCO ₂ e/MEUR)	4,137.6
Total GHG emissions (market-based) per net revenue (tCO ₂ e/MEUR)	4,137.6

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Norra's gross greenhouse gas emissions by Scope 1, 2, and 3

	Base year 2025
Scope 1 GHG emissions	
Gross Scope 1 GHG emissions (tCO ₂ e)*	153.7
Scope 2 GHG emissions**	
Gross location-based Scope 2 GHG emissions (tCO ₂ e)	-
Gross market-based Scope 2 GHG emissions (tCO ₂ e)	-
Significant Scope 3 GHG emissions	
Total Gross indirect (Scope 3) GHG emissions (tCO ₂ e)	375,269.7
1 Purchased goods and services	9,254.9
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	19.1
5 Waste generated in operations	525.6
6 Business traveling	69.8
8 Upstream leased assets	0.5
13 Downstream leased assets	365,400.0
Total GHG emissions	
Total GHG emissions (tCO ₂ e)	375,423.5

*Direct emissions include all fuel consumed by Norra's ground equipment. Finnair has included all flights under its operational control in the company's Scope 1 direct greenhouse gas emissions, including those operated by Norra. For this reason, greenhouse gas emissions generated during flights operated by Norra are reported under Scope 3 category 13.

**Greenhouse gas emissions from the energy consumption of premises used by Norra are reported in Scope 3 category 8.

Norra's biogenic Scope 1 carbon dioxide emissions for 2025 totalled 147.9 tonnes. The calculation of biogenic carbon dioxide emissions covers all scope 1 biogenic carbon dioxide emissions (those generated by using biofuels).



Reporting principles for greenhouse gas emissions metrics

Norra uses the GHG Protocol as the reference framework for emission calculations and applies the operational control approach. Norra has combined 100% of the greenhouse gas emissions from activities under its operational control.

When calculating greenhouse gas emission intensity based on net revenue, Norra uses the financial period's net revenue in line with Finnish Accounting Standards (FAS).

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Description of activities significant to Norra, calculation methods, assumptions used, and emission factors

Scope	Description	Materiality
Scope 1	Direct emissions include all greenhouse gas emissions generated by the ground support equipment operated by Norra. The fuel consumption figures for ground support equipment are taken from fuel supplier invoices. Emission factors for fuels are based on the values from Statistics Finland's Fuel Classification 2025.	Material
Scope 2	Greenhouse gas emissions from the energy consumption of premises used by Norra are reported in Scope 3 category 8.	Non-material
Scope 3		
1 Purchased products and services	Most of the products and services used are sourced from Finnair under inter-company agreements. Accordingly, the category includes all purchased products and services that Norra does not obtain from Finnair under agreements. Emissions have been calculated using the spend-based method applied to the procurement of purchased goods and services. The emission factors used were obtained from the ClimaTiq database, with Exiobase as their data source. Inflation has been accounted for in the emission factors.	Material
2 Capital goods	In this context, capital goods refer to fixed assets, i.e. tangible fixed assets. This category is immaterial for Norra, as the company did not purchase or acquire any capital goods in 2025.	Non-material
3 Fuel- and energy-related activities (not included in Scope 1 or Scope 2)	Emissions from the extraction, production, and transport of fuels used in ground support equipment. The calculation is based on the actual fuel consumption of the ground support equipment. The life cycle emissions of renewable fuels used by ground support equipment are based on data provided by the fuel supplier. In 2025, the emission value reported by the fuel supplier was 0.299 kgCO ₂ e per litre.	Material
4 Upstream transport and distribution	This category is immaterial for Norra, as the company did not purchase third-party transport or distribution services in 2025.	Non-material
5 Waste generated in operations	Waste generated in operations includes emissions from the use of de-icing and anti-icing agents, as well as waste produced in Norra's operations. The company is responsible for treating this waste through purchased waste treatment services. To avoid double counting, waste covered by waste treatment services purchased by Finnair has been excluded from the calculation, since Finnair reports it under its own corresponding category. This includes, for example, waste produced on flights. The emission factors for de-icing and anti-icing agents were provided by the glycol supplier. In 2025, the glycol supplier reported emission values of 1.59 kgCO ₂ e/litre (Type I) and 0.91 kgCO ₂ e/litre (Type IV). Other emission factors for waste used in the calculation come from the UK Department for Environment, Food and Rural Affairs (DEFRA) database (UK Government GHG Conversion Factors for Company Reporting, 2025).	Material
6 Business travel	Business travel includes greenhouse gas emissions from business trips and hotel stays by employees. Business trips include all employee business travel undertaken by plane, taxi, or train. Hotel accommodation data is collected from reported hotel invoices. The emission factor applied to train travel is 1.4 gCO ₂ e/pkm (VR, 2025). Other emission factors used in the calculation come from the UK Department for Environment, Food and Rural Affairs (DEFRA) database (UK Government GHG Conversion Factors for Company Reporting, 2025).	Material
7 Employee commuting	Greenhouse gas emissions from employee commuting are considered a material emission category for Norra. However, in 2025, the company lacked sufficient information to calculate emissions in this category, so it was not included in the 2025 report. Norra will improve its emissions calculations over the years to come to enable reporting of the climate impacts of commuting.	Material
8 Upstream leased assets	Upstream leased assets include indirect greenhouse gas emissions from the electricity and heat purchased for the premises used by Norra. Norra is a subtenant in the premises it occupies and does not purchase energy for the properties itself. To prevent double counting between Norra and its landlords, Norra reports emissions from purchased energy as Scope 3 greenhouse gas emissions. Energy consumption figures for the premises used by Norra have been obtained from the lessor's premises management system for the Helsinki Airport premises, and directly from the lessor for the Seinäjoki premises. In 2025, the lessor at the Helsinki Airport premises purchased 100% emission-free electricity (nuclear energy) and 98% renewable district heating for the Helsinki Airport premises. A carbon emission factor of 152.8 kgCO ₂ /MWh has been used for fossil district heating, as provided by the lessor.	Material

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Scope	Description	Materiality
9 Downstream transportation and distribution	In this context, downstream transportation and distribution refers to greenhouse gas emissions arising from the transportation and distribution of products sold during the reporting year. This category is immaterial for Norra, as the company is a service provider and does not sell products.	Non-material
10 Processing of sold products	This category is immaterial for Norra, as the company is a service provider and does not sell products.	Non-material
11 Use of sold products	This category is immaterial for Norra, as the company is a service provider and does not sell products.	Non-material
12 End-of-life treatment of sold products	This category is immaterial for Norra, as the company is a service provider and does not sell products.	Non-material
13 Downstream leased assets	<p>Downstream leased assets include the greenhouse gas emissions from the fuel consumption of aircraft that Norra leases to Finnair under the Purchase Traffic Agreement.</p> <p>As fuel purchases under the Purchase Traffic Agreement are the responsibility of the lessee, i.e. Finnair, Finnair is also responsible for reporting the operational data. Finnair has included all flights under its operational control in the company's Scope 1 direct greenhouse gas emissions, including those operated by Norra. The Purchase Traffic Agreement (PTA) between Norra and Finnair specifies that EU ETS and CORSIA reporting will use an approach where Finnair, as the lessee, is responsible for reporting and offsetting these emissions.</p> <p>Emissions data comes from Finnair's own monitoring systems and is based on actual annual fuel consumption. The CO₂e emission factor applied for fossil aviation fuel is 3.64 kgCO₂e/kg (ISO 14083:2023). This factor includes all greenhouse gas emissions generated throughout the aviation fuel's life cycle.</p>	Material
14 Franchises	The category is immaterial for Norra, as the company does not operate a franchising business.	Non-material
15 Investments	According to the GHG Protocol guidelines, this Scope 3 category applies only to financial services companies.	Non-material

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Circular economy



The circular economy is continually evolving in the aviation industry, and its significance grows as the sector shifts towards more sustainable operating models. Although Norra has not yet widely adopted circular economy principles, these principles provide significant opportunities to reduce environmental impacts and use resources more efficiently. The circular economy can reshape the supply chain at every stage, from product design through to end-of-life processes. Managing and recycling in-flight waste is crucial, as it accounts for a significant share of airlines' total waste. In addition, the environmental impacts of de-icing and anti-icing agents call for particular attention to guarantee safety and enable sustainable operations.

Material impacts, risks, and opportunities related to the circular economy

Material impacts, risks, and opportunities related to the circular economy have been identified as part of Norra's double materiality assessment. The assessment process is described in more detail in the section [Processes to identify and assess material impacts, risks, and opportunities](#).

We have assessed impacts, risks, and opportunities related to the circular economy mainly through resource use in Norra's own flight and ground operations, as well as waste management at the company's home base, Helsinki Airport. The double materiality assessment found that Norra does not have significant resource inflows, as it obtains most of the products and services required for its operations from Finnair, including in-flight products and waste management services. Resource outflows generate substances that burden the environment and may affect it. Norra's ground operations use de-icing and anti-icing agents to ensure flight safety.

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Material impacts, risks, and opportunities related to the circular economy

Circular economy

The use of virgin raw materials leads to the depletion of natural resources at the upstream value chain

Negative impact

Policies related to resource use and circular economy

Norra does not have a separate circular economy policy, but it applies circular economy principles in practical operations throughout the organisation. Circular economy thinking is particularly reflected in the efficient use of materials and in solutions that aim to extend product life cycles. However, the circular economy remains an area where Norra still has considerable potential for development. The goal is to progress step by step towards more systematic practices.

Norra acquires most of the products and services it needs for its operations from Finnair, including in-flight products and waste management services. For this reason, in-flight waste sorting and recycling follow Finnair's instructions and processes. This ensures consistent and efficient circular economy practices in the shared operational environment.

Reducing the need for primary resources in aircraft

Aviation legislation regulates the use and service life of aircraft materials. Within this framework, Norra and Finnair Technical Services keep aircraft parts in circulation for as long as possible. We also continuously assess new repair opportunities and implement them whenever possible.

Norra obtains most of the maintenance services for its aircraft from Finnair, which services and repairs various components in its own facilities. In addition to its own maintenance and repair services, Finnair takes part in shared component pools with

other operators. Joint inventory and repair management measures help reduce the need for primary resources and optimise Finnair's own stock.

Reducing primary resource use and advancing the circular economy in in-flight services

Norra advances Finnair's circular economy targets by applying shared policies and improving its own processes to boost recycling within the joint operating environment. Since Norra uses products and services sourced from Finnair, including in-flight products and waste management solutions, it applies circular economy practices across its operations according to Finnair's guidelines and principles. In 2024, Norra updated its cabin recycling instructions in cooperation with Finnair Kitchen. This made it possible, among other things, to start recycling glass bottles on ATR aircraft from April 2024. In addition, Finnair produced an additional training video on recycling, which was shown to Norra Cabin Crew in 2024 and 2025. The training video raised Cabin Crew awareness of recycling and helped put circular economy principles into practice. As a result of these measures, recycling was carried out in a more varied way in 2025. Although these actions have supported Finnair's efforts to reduce the use of primary resources and prevent the generation of non-recyclable waste, Norra still needs to make significant progress in strengthening circular economy practices to support Finnair more effectively.

In addition, Norra has begun to improve the management of material flows by reducing waste and extending product lifespans in line with circular economy principles. The life cycle of personnel uniforms is managed by repairing damaged garments through a partner's tailoring service and recycling retired uniforms into new products or materials. This reduces textile waste and keeps materials in circulation for as long as possible. In addition, moving to digital tools has significantly reduced paper consumption: traditional paper logbooks, operational manuals, and maintenance documentation have

been replaced with electronic systems. This streamlines processes and reduces the volume of printed material. These actions support the shift towards a more resource-efficient and low-waste way of operating.

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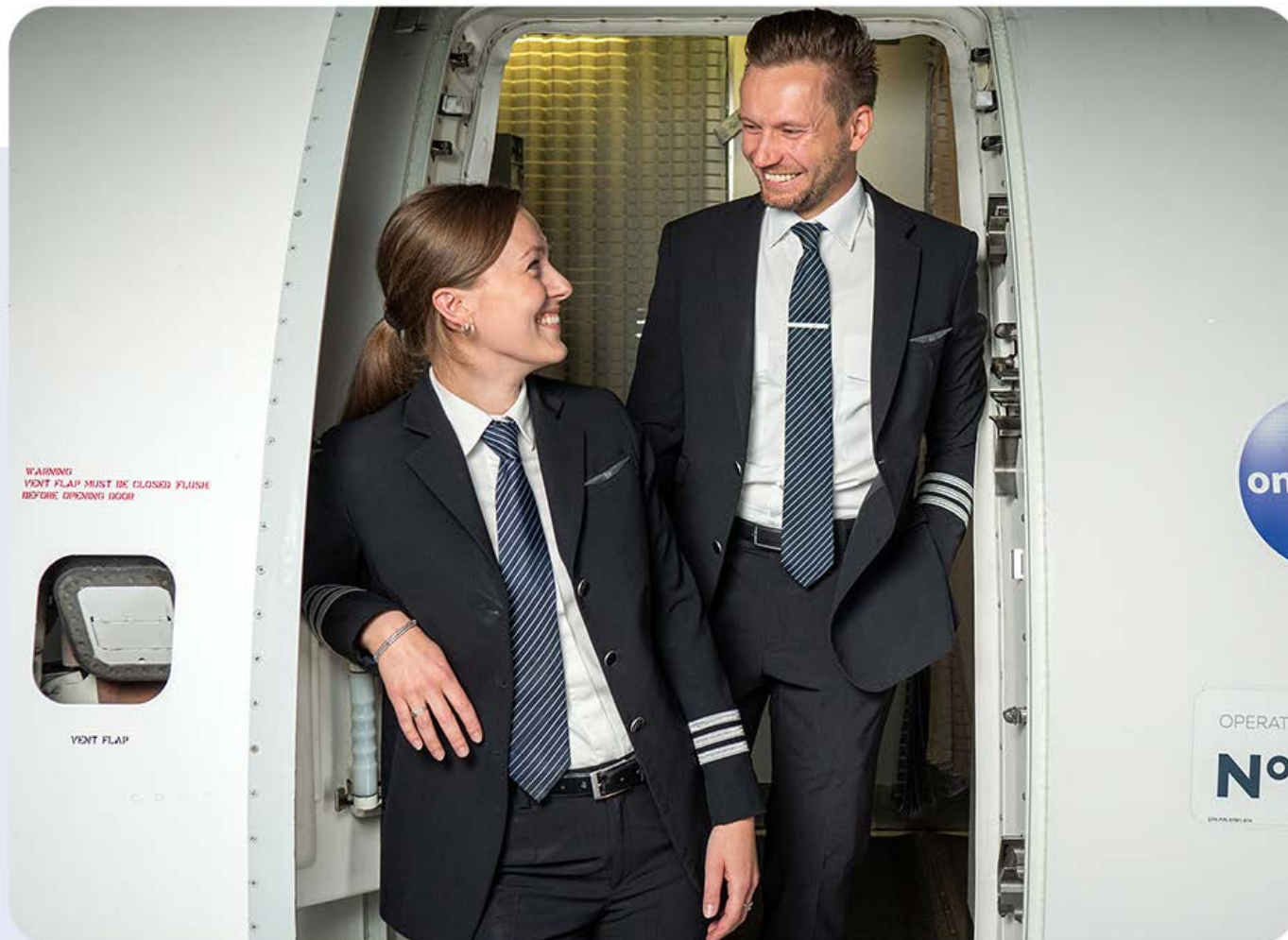
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Norra's own employees, and consideration of their interests, perspectives, and rights, are central to both the company's daily operations and its strategic direction. A motivated and healthy workforce, together with close cooperation with employees, forms the foundation of Norra's operations. This is reflected in safe, punctual, and high-quality service experiences for passengers. Employee involvement, interactive leadership, and ongoing development opportunities ensure that employees' perspectives and experiences are genuinely part of strategic decision-making and the improvement of operating models. Norra is committed to promoting equality and equal opportunities, and to maintaining a safe and inclusive work environment. In this way, employees' interests, views, and rights become a core part of the company's sustainable, long-term business.

Material impacts, risks, and opportunities related to own workforce

Material impacts, risks, and opportunities related to Norra's own workforce have been identified as part of Norra's double materiality assessment. The assessment process is described in more detail in the section [Processes to identify and assess material impacts, risks, and opportunities](#).

Norra's own workforce in Finland includes Flight Crew members, Cabin Crew, Ground Controllers, as well as experts and supervisors from the Operations Control Centre and office. We regularly assess impacts on the workforce by analysing personnel data, conducting personnel surveys, and maintaining continuous dialogue.

The assessment identified significant negative impacts related to psychosocial strain and irregular working hours, both of which can harm employees' health, well-being, and motivation. In addition, the risk assessment identified the possibility of

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strikes and other work stoppages, as well as a decline in employer reputation, as material risks.

Possible positive impacts on employees were found to result from permanent employment contracts, comprehensive employee benefits, flexible working time arrangements, and high-quality crew scheduling. These factors support personnel well-being and motivation. In addition, opportunities for training and skills development, fostering an inclusive work environment, promoting career development, and increasing job satisfaction were also identified.

The assessment also revealed opportunities for Norra, including building a strong employer brand by adopting practices that promote workplace well-being, as well as using local agreements to enable more flexible development of terms of employment.

Because personnel play a central role in Norra's operations, managing workforce impacts and risks forms a material part of the company's strategy.

Material impacts, risks, and opportunities related to own workforce

Working conditions: Occupational health, safety and well-being

A stressful work environment and irregular shift work affect employees' health, well-being and motivation	Negative impact
Enhancing employees' health, well-being and motivation through permanent employment relationships, comprehensive employee benefits, flexible remote-work practices and high-quality crew	Positive impact
Risk of strikes and other work-related disruptions	Risk
A strong employer brand and corporate culture enabled by comprehensive employee well-being	Opportunity
Flexible local bargaining on terms of employment	Opportunity

Equal treatment and equal opportunities for all: Diversity, training and skills development

Career development through training and skills-development opportunities	Positive impact
An inclusive work environment that promotes employees' health, well-being and motivation	Positive impact
Risk of declining employer reputation	Risk

Policies related to own workforce

Health and safety

Norra uses several measures to promote occupational health and safety across the entire organisation. Management of occupational health and safety is directed by the Occupational Health Care Action Plan, the Occupational Safety and Health Action Plan, and the Early Support Model. The HR Board has approved all these plans.

Occupational Health Care Action Plan

The Occupational Health Care Action Plan is a statutory document prepared jointly by the employer and occupational health care. It guides cooperation on occupational health and the promotion of workplace health. The action plan is based on the Occupational Health Care Act, workplace assessments carried out at different Norra locations, and risk assessments of the work performed by various Norra personnel groups. It sets out the objectives, specific actions, responsibilities, and collaboration practices for occupational health care, addressing workplace needs, and supporting work ability. The aim is to support employees' health, work ability, and well-being by offering preventive occupational health care and medical services, and by improving the company's health and well-being management. The action plan is reviewed regularly in quarterly meetings between the Occupational Health Care Team and the Management Team, and updated every three years.

Occupational Safety and Health Action Plan

The Occupational Safety and Health Action Plan directs Norra's proactive and systematic development of workplace safety and occupational health. The Occupational Safety and Health Action Plan is founded on the Occupational Safety and Health Act. The Action Plan outlines the workplace's needs for improving working conditions, the impact of work environment factors, the occupational safety tasks and responsibilities of both employer and employees, details of the safety instructions issued by the employer, and an account of how activities to support work ability are organised. The Occupational Safety and Health Action Plan also outlines the principles for preventing occupational accidents and the policies for managing them. The Occupational Safety and Health Action Plan is updated every two years.

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Early Support Model

Norra applies the Early Support Model, a health-promoting approach that identifies factors threatening employees' work ability, prevents more serious work ability challenges, and supports employees' well-being and ability to cope at work. The Early Support Model outlines procedures for addressing situations that threaten work ability. The employee, supervisor, Human Resources, and occupational health services work together to address situations that threaten work ability and create a personal plan for the employee to enhance work ability.

Employee well-being and skills

Norra employs several measures to support personnel well-being and help employees cope at work across the entire organisation. The work community development plan guides the development of employee well-being and competence. Its goal is to ensure the continuous well-being of personnel in the dynamic, rapidly changing operating environment of the aviation industry.

Personnel receive orientation, training, and regular refresher courses in line with aviation regulations. These are organised across different departments as both in-person and online training. Authorities regularly audit the delivery and documentation of training. Matters related to personnel policies and work community development are prepared in the monthly meetings of the HR Board and approved by the Management Team.

Work community development plan

Norra's work community development plan is a comprehensive framework based on the Act on Co-operation within Undertakings. It sets out the objectives and actions for developing personnel competence and workplace well-being. The plan outlines the current situation, anticipated development trends, and changes that could affect personnel

competence requirements and well-being. The development plan includes sections on employee competence, well-being at work, management, personnel structure, and ways of utilising the workforce, among other areas. The main objective of the plan is to systematically and consistently develop the personnel of the work community. The plan is reviewed regularly in the cooperation committee together with personnel representatives. It is drawn up for two years at a time to support the long-term development of the work community.

Diversity, equity, and inclusion

Norra is committed to promoting diversity, equity, and inclusion in all its activities, and to ensuring equal employment opportunities regardless of an individual's background or personal characteristics. This work is guided by Norra's Equality Plan, Non-Discrimination Plan, and Model for Preventing Harassment and Inappropriate Treatment, all of which have been approved by the HR Board.

Equality Plan

Norra has prepared an Equality Plan, specifically addressing pay and other terms of employment, in line with the Act on Equality between Women and Men. The plan guides actions that promote gender equality. The Equality Plan assesses how equality is realised in the workplace, develops non-discriminatory working conditions and practices for recruitment and personnel decisions, promotes equality between women and men, provides women and men with equal opportunities to balance work and family life, and respects the free expression of gender identity. The equality plan is drawn up every two years.

Non-Discrimination Plan

Norra has a Non-Discrimination Plan, as required by the Non-Discrimination Act. The plan aims to ensure an equitable and inclusive workplace and to prevent discrimination at every stage of employment, including recruitment, career

development, pay, training opportunities, and working condition practices. The plan considers the main grounds for discrimination and sets out both the principles and specific actions to advance equity. The Non-Discrimination Plan is drawn up every two years.

Policy for preventing harassment and inappropriate treatment

Norra has a policy for preventing harassment and inappropriate treatment. Norra does not tolerate any form of harassment or inappropriate treatment in the workplace or during work duties. The purpose of the policy is to help employees identify harassment and inappropriate treatment that disrupts normal work performance, impairs the functioning of the work community, or endangers the safety or health of employees or other community members. The policy explains what actions to take if someone witnesses such behaviour, where to report it, and how cases are handled. The policy is based on the Occupational Safety and Health Act and the Non-Discrimination Act. Personnel are familiarised with the policy during occupational safety induction.

Processes to engage with own workforce and workers' representatives about impacts

Norra maintains open and regular dialogue with its personnel, both directly and through employee representatives. Key channels for interaction include meetings between managers and employees, team and unit meetings, and internal communication forums. In addition, the company conducts structured dialogue with personnel representatives through cooperation and occupational safety committees.

Department heads for each personnel group hold regular meetings with their respective personnel representatives and organise monthly department meetings for personnel. Targeted events are organised for different personnel groups, such as

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monthly crew planning meetings for flying personnel and Meet the Team events every other month for office personnel. These events support regular dialogue and enhance transparency in operations. In addition, Core Forum events are held four times a year for Senior Officers, focusing on topics related to specialist and supervisor roles.

In addition to official meetings, the company maintains ongoing, responsive dialogue by organising informal discussions and meetings when necessary. These complement the established meeting structures.

We regularly assess personnel views and development needs with personnel surveys carried out twice a year.

Contact type: Cooperation Committee

The Cooperation Committee meets every other month. The Cooperation Committee includes elected representatives or shop stewards from each personnel group (Cabin Crew, Flight Crew, Ground Controllers, Senior Officers, and Officers), as well as employer representatives. The committee addresses matters between the employer and personnel, including working conditions, changes that affect employees' status, and the development of the work community. The aim is to advance transparency, dialogue, and mutual understanding in decision-making. Personnel representatives may submit their own proposals for discussion. Minutes are recorded for each meeting and published for all employees on the company's intranet.

Contact type: Occupational Safety and Health Committee

The Occupational Safety and Health Committee meets four times a year and includes occupational safety representatives from personnel groups with different working conditions (Cabin Crew, Flight Crew, office personnel, and Ground Controllers). The committee addresses key areas of occupational health and safety, including the Occupational Health Care Action Plan, the

Occupational Safety and Health Action Plan, workplace surveys conducted by the company, and statistics and instructions concerning occupational accidents. Personnel representatives may submit their own proposals for discussion. Minutes are recorded for each meeting and published for all employees on the company's intranet.

Contact type: Meetings with employee representatives

The company maintains active and regular dialogue with representatives of various personnel groups, not only during collective bargaining negotiations. Department heads and personnel representatives have refined the practices to address current needs, and they may differ between personnel groups. As a rule, meetings take place once a month. Representatives of personnel groups may inform the employees they represent about the contents of the meetings when needed. Responsible department heads inform the rest of the management team about how issues and decisions raised in the meetings were handled.

Flight Crew

Dialogue with Flight Crew personnel representatives takes place in the employment and seniority committee, which meets monthly as specified in the Flight Crew collective bargaining agreement. The committee is chaired by the Head of Flight Operations, with the company's other representative being the Employment Lawyer. The Flight Crew are represented on the committee by the chair of the Flight Crew Association and the association's union representative or their deputies. The committee addresses employment matters for Flight Crew members according to the agenda set out in the collective agreement. Norra is negotiating with its employer association, Service Sector Employers PALTA ry, on a company-specific collective agreement between Norra's Flight Crew, the company, the Norra Flight Crew association FAPA ry, and their trade union, Association for Professionals and Managers ASIA ry.

Cabin Crew, Ground Controllers, and Officers

For Cabin Crew, Ground Controllers, and Officers, meetings are more informal. However, department heads maintain regular meetings and dialogue with personnel representatives. No minutes are kept of these meetings. They actively foster employer–employee relations, clarify ambiguous interpretations of the collective or local agreements, and help prevent problems and conflicts. Norra is negotiating with its employer association, Service Sector Employers PALTA, on a company-specific collective agreement between Norra's Cabin Crew and the company. It also negotiates local agreements with the Norra Cabin Crew association FAP, and their trade union, Association for Professionals and Managers ASIA. For Ground Operations personnel, Norra follows the generally binding collective agreement on air transport services between PALTA and IAU. For Officers, Norra follows the generally binding collective agreement for air transport officers between PALTA and the trade union PRO.

Senior Officers

Active dialogue takes place between the Senior Officers' elected representatives and the employer. The CEO, Head of People and Communications, and Employment Lawyer attend the meetings on behalf of the employer. The Senior Officers' union representative and deputy union representative represent the employees. For Senior Officers, Norra's standard terms and conditions of employment for Senior Officers apply.

Contact type: Crew scheduling meetings

The company holds monthly crew scheduling meetings for representatives of Cabin Crew and Flight Crew, focusing on crew planning. The meeting reviews the route structure of the coming month's crew schedule, the shift structure, the acceptance rates for day-off and shift placement requests, the numbers of working hours and days off, the number and destinations of overnight shifts, special features of the aircraft fleet, the personnel resource plan, and personnel feedback on

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the previous month's rosters. The purpose of this meeting is to ensure transparency in the crew scheduling process for personnel representatives, improve the quality of shift rosters for employees working irregular shifts, and serve as a feedback channel for personnel. Employees can give feedback to personnel representatives, who compile it and present it for discussion at the meeting.

Contact type: Department meetings

Department heads regularly hold interactive department meetings for personnel. At these meetings, they share updates from their departments and provide information about ongoing key development projects and other current matters. Meetings can be held remotely or in person. If department personnel work in shifts, meetings are recorded and personnel can watch the recordings later on the company's intranet via their departments' own channels. Participants at the meetings can share their opinions and ask questions.

Contact type: Meet the Team days for office personnel

Every two months, a Meet the Team event is organised for office personnel. These events provide a forum for dialogue between employees and the company's experts, including Senior Officers and Officers. The meetings cover topics relevant to these roles and provide updates on company matters. Norra's office personnel are spread across six locations in the Helsinki metropolitan area and Seinäjoki. Most office personnel work flexible hours with the option for remote work. The Meet the Team event aims to strengthen community, encourage face-to-face meetings, and boost interaction.

Contact type: Core Forum for Senior Officers

Four times a year, the company organises a Core Forum event for supervisors and Senior Officers in specialist roles. The event covers current topics that are relevant and interesting specifically for this group.

Contact type: Employee surveys

The company gathers feedback from its personnel and tracks job satisfaction and workplace atmosphere with personnel surveys conducted twice a year. A more extensive personnel survey is conducted each autumn, and its results highlight various development themes annually. Development projects are designed according to the identified development themes. The projects seek to enhance the work community, well-being at work, and the working atmosphere. Each spring, we conduct a shorter pulse survey to track changes in job satisfaction and the work atmosphere. The management team and the company's cooperation committee review the survey results together with personnel representatives. After this, each department discusses the results with their personnel. The survey results are published on the company's intranet.

Contact type: Intranet

The company's official communication and information channel is the intranet system, which organises communications and work instructions for different personnel groups. The intranet contains the company's manual library and work instruction library, operational and administrative communications, as well as guidance and communications related to employment relationships.

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

Norra has implemented several operating models and feedback channels that enable personnel to bring up concerns or issues related to their work, working conditions, or the company's operations. These structures are designed to ensure that potential negative impacts on personnel are identified early, and that the company can address them systematically and through open dialogue.

The company's regular procedures for remediating negative impacts

The company's own regular internal measures for examining employees' working conditions and the negative effects of work on personnel include workplace assessments and risk evaluations. In addition to these assessments, the company uses several other procedures to respond consistently to risks, deficiencies, and stress factors identified in the workplace.

Workplace surveys

Workplace surveys aim to identify health hazards and risks arising from the workplace conditions of Norra's personnel, and to assess their significance for health. Workplace surveys are based on the Occupational Health Care Act and form part of ongoing occupational safety efforts. Their aim is to improve the health and safety of the working environment. During the surveys, an external occupational health team (a doctor and a team of nurses) visits the company's sites to observe working conditions and gain a thorough understanding of the personnel's work environment. The expert team prepares a report on the investigation. The report assesses health hazards, proposes improvements to remediate identified issues, and tracks the progress of agreed actions. A workplace survey is carried out for each personnel group and site at least every five years, or more often if there are material changes in the company's operations. The occupational health and safety committee reviews the reports and publishes them on the intranet for all personnel to access.

Risk assessments

Norra carries out risk assessments every two years in all personnel groups, as required by the Occupational Health Care Act. The aim is to identify hazards, stress factors, and the associated negative impacts on personnel well-being and safety arising from work and working conditions. The assessments identify key risks and their potential consequences. As part of the assessment, a report is prepared

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describing preventive actions to reduce risks and improve workplace safety. The reports are published for all personnel on the company's intranet. The measures and their effectiveness are monitored and evaluated together with personnel representatives in occupational safety meetings. Reports are approved in these meetings before publication. The reports are also reviewed in department meetings with employer representatives. An individual employee can use the complaints mechanism by bringing the matter to their own occupational safety representative for consideration.

The Fatigue Call operating model for flying personnel

The Fatigue Call operating model is available to flying personnel and helps them recognise their own fatigue and ensure safe flight operations. The operating model is based on the European Union Aviation Safety Agency (EASA) regulation, which requires air operators to establish a method for managing general fatigue risk among Flight Crew. The purpose of the operating model is to promote safe flight operations. The Fatigue Call operating model is taught to flying personnel as part of the company course at the start of employment and later in refresher training during employment. Instructions for the Fatigue Call operating model are published on the company's intranet.

Special Assistance Team (SAT)

The company has a SAT Team that supports our employees during various crises at work and in their private lives. The team members are trained for their role and are also ready to serve as part of the company's Emergency Response Team during a serious hazard or major accident. The SAT Team monitors the company's daily flight operations. If a disruption occurs, a team representative proactively contacts the Flight Crew. The SAT Team operates according to the company's Emergency Manual, which also outlines the group's roles and procedures. The SAT Team is designed to provide emotional

support for personnel facing serious crises at work or in their personal lives.

The company's reporting systems for identifying negative impacts

Common channels for anyone in the company to raise concerns or issues include the flight safety reporting system and the company's whistleblowing channel.

Within the flight safety reporting system, personnel submit internal safety management quality and deviation reports, occupational accident reports, and reports focused on fatigue management for flying personnel. Reports may be submitted anonymously or with personal details. The Safety and Compliance Department manages the reporting system, processes reports, and monitors the effectiveness of actions. There is no separate complaints mechanism for personnel regarding the handling of reports related to flight safety. The company regularly audits its Safety Management System and compliance monitoring system, as well as measures arising from reports, through both internal audits and audits conducted by the national authority (Finnish Transport and Communications Agency Traficom) and the International Air Transport Association (IATA). The results of the audits are reported to the company's management. The company provides safety and quality training to all personnel at the start of their employment. Operational personnel receive annual refresher training on these topics.

Suspected misconduct related to Norra can be reported through Norra's whistleblowing channel. The whistleblowing channel is available on Norra's public website. Reports of suspected misconduct or violations received via the channel are addressed without delay. All reports are handled anonymously and confidentially. A detailed description of the process for handling reports submitted via the Whistleblowing

channel can be found in the Governance Information section, under [Norra's whistleblowing channel](#).

Anonymous feedback channels and employee surveys

Norra employees can give anonymous feedback on general concerns and issues through various annual personnel surveys. The personnel surveys cover atmosphere, leadership, well-being, culture, and working methods; the Fatigue Survey examines fatigue management among flying personnel; and the Security Survey reviews the company's security practices. Development working groups use the personnel surveys to plan actions. They regularly monitor the results and assess their impact. Survey results are published for personnel on the company's intranet. There is no complaint mechanism available to personnel with regard to handling survey results.

Raising personal issues

Individual employees can bring up work-related personal issues and concerns that affect only themselves by using the Early Support Model or the Harassment and Inappropriate Behaviour Prevention Model. All Norra personnel can use these models by contacting their supervisor, the company's HR team, the occupational safety team, or occupational health care. An individual employee may also raise a concern with their employee representative or the occupational safety representative for it to be addressed.

Peer Support Group for Flight Crew members

Norra has a Peer Support Programme for flight crew, established in line with an EU regulation. The Peer Support Group is a confidential group that operates independently of the company. It does not report to the company or the company's occupational health service about client contacts with the support group. Peer support aims to identify factors that place strain on commercial pilots at an early stage, offer them support and a trustworthy conversation partner, and prevent mental strain and its impact on their work. A group of

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Norra's Flight Crew members, selected and trained for this role, act as peer support personnel. An external, qualified psychologist supervises the Peer Support Group. The group's activities are described in the company's flight operations manual, which is published on the company's intranet. In addition, Flight Crew members receive training on the group's activities as part of occupational health and early intervention orientation at the start of their employment.

Cooperation with employee representatives to remediate problems

Employee representatives regularly attend meetings with employer representatives, where they raise personnel concerns and development needs. These dialogue structures include the cooperation committee (employee representatives), the occupational safety committee (occupational safety representatives), and crew planning meetings for flying personnel, where matters such as the quality of work shifts are addressed. Employees can approach their personnel group representative with any concerns, and the representatives raise these issues for discussion in meetings.

Minutes are prepared for matters agreed in meetings and made available to personnel, except for the minutes of crew scheduling meetings. Employer and employee representatives jointly monitor how the agreed measures are implemented and their impact. The company organises meetings and ensures they run effectively. At the start of employment, the company provides employees with training on cooperation procedures, occupational safety, and the company's operating models.

Employee representation activities

Employees can raise issues through elected union representatives, or by contacting external parties such as their employee association, trade union, or the Finnish Supervisory Agency. These parties can contact the employer and request explanations regarding the matter. The Finnish Supervisory

Agency manages matters concerning all employees working in Finland. Norra works closely with employee associations, trade unions, and the Finnish Supervisory Agency.

Structures protecting employee representatives from retaliation

Norra complies with the practices set out in collective agreements and local agreements concerning employees' right to elect union representatives and occupational safety representatives to represent the personnel. Elected representatives receive the time off for training specified in the agreements, as well as regular time to carry out their duties. A working time arrangement appropriate to the role is defined for them, and union representatives are guaranteed earnings progression as separately agreed.

Regular meetings with employee representatives are scheduled with the elected representatives, and ongoing dialogue with the company is supported. They receive the tools needed for their role and time to meet and communicate with the employees they represent. Norra considers this cooperation a key way to foster effective interaction and to drive ongoing improvement of working conditions and practices.

Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Norra's actions regarding material impacts on its own employees are guided by internally defined targets and action plans. These are set out in Norra's Occupational Health Care Action Plan, Occupational Safety and Health Action Plan, Work Community Development Plan, Equality Plan, Non-Discrimination Plan, and the Action Model for Preventing Harassment and Inappropriate Treatment.

The company's Work Community Development Plan outlines the main development priorities for 2025. These focus on health, safety, employee well-being, working conditions, and collective agreements, as well as advancing diversity, equity, and inclusion. Responsibilities and projects for development actions are allocated to different departments according to their expertise and available resources.

Health and safety

In 2025, Norra continued to improve occupational health and safety in line with the Occupational Health Care Action Plan and the Occupational Safety Action Plan.

In accordance with the Company's Occupational Health Care Action Plan, monthly operational meetings, quarterly management meetings, and the annual steering group meeting were organized together with the occupational health care partner during 2025. In addition, a separate management cooperation meeting was held with the earnings-related pension insurance company. Personnel received training on early support and the importance of good sleep. Supervisors received training on the Early Support Model. In addition, personnel received seasonal flu vaccinations.

According to the Occupational Safety and Health Action Plan, the Occupational Safety and Health Committee met four times in 2025. The company carried out random breath tests for flying personnel each month, and for office and ground controllers on average every other month, in line with the substance abuse programme. The company carried out risk assessments for the employee groups of Flight Crew members, Cabin Crew, and Ground Controllers. The company and Finnair jointly organised a Safety Week event to improve occupational safety in autumn 2025. The rescue plans for the company's sites were incorporated into HR orientation and communicated to employees. The company started updating its substance abuse programme following changes in aviation legislation.

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Occupational safety elections were held across all personnel groups, organised in cooperation with employee groups.

Employee well-being

In 2025, Norra supported the ongoing improvement of employee well-being according to the Work Community Development Plan. The company strengthened community, feedback processes, and everyday working conditions. In 2025, the company made a local agreement on working time models for cabin crew employees aged over 55. The reduced working time model is designed to help older employees extend their careers. Employee benefits continued to improve, and office personnel received noise-cancelling headphones to enhance the ergonomics of open-plan working. In addition, the requested No Meal option was introduced for flying personnel in relation to meals during working hours. Employee well-being was monitored throughout the year through regular personnel surveys and HR reporting.

In 2025, the company implemented updated hybrid work practices for office personnel to better integrate work and leisure time. The company also introduced in-office days to streamline management and work processes. The company significantly enhanced the leisure-time air travel benefit for its personnel and introduced a benefit covering sports, culture, and well-being. The company rewarded its personnel with a performance bonus. By developing leisure benefits, the company seeks to increase personnel commitment.

Training and skills development

In 2025, Norra carried out two personnel surveys and launched a new Meet the Team day for office personnel to foster a sense of community. The company used personnel surveys to track changes in atmosphere, culture, and employee well-being, and used the results to plan development actions.

The company's Cabin Operations Department and Flight Operations Department, in collaboration with Finnair, opened a Crew Café space for flight personnel. This space fosters community and encourages interaction between supervisors and employees.

The Flight Operations Department increased the amount of simulator training given to Flight Crew members. By increasing training, the goal is to strengthen the expertise and confidence of Flight Crew members in demanding regional operations.

In 2025, Norra introduced new training courses for supervisors. These are held every other month and focus on the company's internal human resources processes. In addition, dedicated guidance pages for supervisors were created on the company's intranet. The new digital learning platform became an established part of the company's induction processes. Supervisor training aims to harmonise and equalise supervisor practices. The digital learning platform streamlines and improves orientation across different personnel groups.

Working conditions and collective agreements

Norra respects its employees' freedom of association and their right to collective agreements. Norra, together with the employers' association, observes collective agreements and local agreements made with the representatives of each personnel group. Norra has collective agreements for Cabin Crew, Flight Crew, Ground Operations personnel, and Officers, as well as local agreements made with their local associations or personnel representatives. In addition, Norra's Senior Officers are subject to the terms of employment agreed specifically for Senior Officers.

In 2025, Norra implemented a new collective agreement on air transport services for Officers. The reform aims to improve working conditions for Officers and clarify the pay model. This

will help strengthen personnel well-being and make employment terms more consistent.

In addition, during 2025, new company-specific collective agreements were negotiated for Cabin Crew and Flight Crew members. Department managers led collective bargaining negotiations for their respective departments.

The Operational Planning and Control Department organized regular crew rostering meetings 12 times during 2025. Regular crew scheduling meetings aim to improve the quality of Flight Crew shifts and enhance personnel well-being and resilience at work.

Six regular cooperation committee meetings with personnel representatives took place during 2025. Regular Cooperation Committee meetings aim to improve the company's general shared practices and guidelines concerning personnel, and to prevent conflicts with personnel.

Diversity, equity, and inclusion

In 2025, Norra continued to advance diversity, equity, and inclusion in line with its Equality Plan and Non-Discrimination Plan.

In accordance with the company's Equality Plan, during 2025 Norra monitored the gender distribution in recruitment as well as in different roles, supervisory positions, and Management Team positions. In addition, during the year the company prepared its processes for the entry into force of the EU Pay Transparency Directive. New pay grades in line with the new collective agreement were introduced for Officers. The company also updated the pay grading system for Officers. This clarified the basis for pay and strengthened pay transparency.

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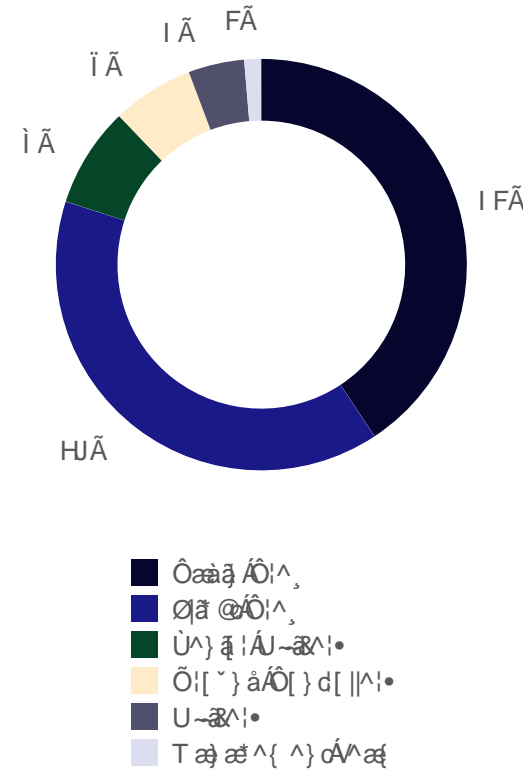
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In line with the company's Non-Discrimination Plan, we monitored equity-related statistics during 2025, focusing in particular on Norra's age distribution. In addition, while preparing the plan, we identified areas for improvement related to gender expression and gender identity in the uniform regulations. During the year, we also began developing employment relations training for supervisors to standardise practices and ensure equitable treatment.

Characteristics of the company's employees

The reported data includes only Norra's own employees. The reported information is shown as the number of Norra's employees at the end of the reporting period, 31 December 2025. The reported data is sourced from Norra's Human Resources management system.

Employees by personnel group



Number of employees by gender

	Number of employees (head count)		
	Men	Women	Total
Cabin Crew	29	276	305
Flight Crew	279	15	294
Senior Officers	32	27	59
Ground Controllers	46	2	48
Officers	7	26	33
Management Team	8	2	10
Total	401	348	749

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Number of employees by contract type and gender

	Men	Women	Total
Number of employees	401	348	749
Number of permanent employees	401	345	746
Number of temporary employees	0	3	3
Number of non-guaranteed hours employees	0	7	7
Number of full-time employees	320	290	610
Number of part-time employees	81	51	132

Norra primarily hires employees for permanent, full-time positions. Fixed-term employees are recruited only for specific reasons, such as balancing production peaks, covering family or study leave, or for project-based work. Employees move to part-time employment solely on a voluntary basis, by their own choice. Norra offers part-time employment contract models, established through collective or local agreements for all personnel groups. These models help employees balance work and leisure more effectively, or allow those over 55 to reduce their workload. Norra only offers variable working hours contracts at the employee's own request. Examples of such situations include an employee leaving to study, retiring, or resigning from the company, as well as onboarding a replacement recruit for the role.

Total number of employees who have left the undertaking during the reporting period (head count)	33
Rate of employee turnover in the reporting period (%)	4.5%

*The personnel turnover rate includes employment relationships ended by either the employer or the employee, and also accounts for retirements. To calculate the turnover percentage, this figure is divided by the total number of employees. Employee turnover does not include individuals who have left because their fixed-term employment contract ended.

Collective bargaining coverage and social dialogue

Norra's own workforce is made up entirely of employees on employment contracts working in Finland. **90.8%** of Norra employees working in Finland are covered by a collective agreement. These employees are represented through the union representative system, which encourages personnel to participate in developing terms of employment and the working environment.

Members of Norra's Management Team and Senior Officers are not covered by any collective agreement. The terms of employment for members of the Management Team are based on individual agreements. The terms of employment for Senior

Officers are based on personal employment contracts and the general terms and practices for Senior Officers in force at any given time, as defined by the employer. The general terms and practices of employment for Senior Officers are, where applicable, derived from the collective agreement for salaried employees. Norra complies with Finnish labor legislation for all personnel groups. A union representative elected by the personnel represents senior employees at the workplace, together with an Occupational Safety and Health representative elected jointly with the employees.

As Norra does not employ personnel outside Finland, the company does not have significant employee groups outside the European Economic Area or in other EEA countries as defined by the ESRS S1 standard. Of employees working in Finland, **98.7%** have personnel representation at the workplace. This supports open and effective dialogue between employer and personnel.

Collective Bargaining Coverage

Coverage Rate Employees – EEA (for countries with >50 empl. representing >10% total empl.)

Employees – Non-EEA (estimate for regions with >50empl. representing >10% total empl)

Social dialogue

Workplace representation (EEA only) (for countries with >50 empl. representing >10% total empl)

0–19 %

20–39 %

40–59 %

60–79 %

80–100 % 90.8%

98.7%

Of Norra's employees with an employment contract, 90.8 % are Cabin Crew, Airline Pilots, Ground Controllers, and Officers. All employees in these personnel groups are covered by their own collective agreements.

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Diversity metrics

The reported data includes only Norra's own employees. The reported information is shown as the number of Norra's employees at the end of the reporting period, 31 December 2025.

Gender breakdown of senior management* by number of employees and percentage

	Head count	Percentage
Top management, Male	8	80.0%
Top management, Female	2	20.0%

*The data is reported according to Norra's definition of senior management. Norra defines members of the Norra Management Team as part of Norra's senior management.

Age distribution of employees

	Head count	Percentage
Distribution of employees (head count) under 30 years old	127	17.0%
Distribution of employees (head count) between 30 and 50 years old	483	64.5%
Distribution of employees (head count) over 50 years old	139	18.6%

Adequate wages

The company regards paying adequate wages as a central part of its responsible HR policy and is committed to complying with all relevant legislation and collective agreements in its remuneration practices. The company's pay system is based on the requirements of each role as well as employees' skills and experience. Its aim is to guarantee employees a predictable and fair level of earnings.

The company applies four separate collective agreements in its operations. More than 90 percent of the company's employees with employment contracts are covered by these collective agreements. Collective agreements set minimum wages, pay increases, and other essential terms of employment.

The company considers that complying with collective agreements guarantees the minimum wage level for all employees covered by them. For employees outside the scope of collective agreements, pay is determined by a job-specific assessment and the terms defined in their employment contracts. The company has not identified any cases where pay fell below the applicable minimum level.

The effectiveness and up-to-dateness of the pay system are monitored as part of the company's annual cycle. Salary levels are regularly reviewed in relation to job demands, changes in collective agreements, and the overall labour market situation. The company does not currently use separate external adequate wage benchmarks to assess salary levels.

Any ambiguities regarding remuneration are resolved together with supervisors, Human Resources, and employee representatives, following established procedures.

Over the next few years, the company will consider supplementing salary level monitoring with external comparative data, including national living wage reference values. The aim is to improve pay transparency and ensure that the remuneration system supports the company's long-term personnel strategy.

The reporting scope covers the company's salaried employees. Subcontractors are not currently included in the assessment of adequate wages, and the company has no separate contractual requirements regarding subcontractors' pay practices.

Social protection

Norra ensures that all its employees receive comprehensive social protection and financial security, along with well-being support in critical life situations where income loss results from illness, unemployment, work-related injury or disability, or parental leave. This is achieved either through public social protection programmes or benefits provided by the company.

Social protection in case of illness

All company employees are covered by Norra's occupational health services and Finland's general social security and support in case of illness. Employees are legally insured with statutory earnings-related pension insurance, occupational accident and disease insurance, and additionally with travel insurance when on business trips.

The collective agreements for different personnel groups and the general terms and conditions of employment for Senior Officers specify that employees receive pay during periods of sick leave. After paid sick leave ends, the company's work ability management practices support and guide the employee in applying for sickness allowance from the Social Insurance Institution of Finland (KELA). If the employee's sick leave is prolonged, the company will assist them in applying for rehabilitation and a rehabilitation allowance from the earnings-related pension insurance company, following the company's work ability management practices. If an employee's illness leads to permanent disability, the company will help them apply for a partial disability pension or a full disability pension.

Social protection in situations involving parental leave

Paid leave during Finnish statutory parental leave has been specified in Norra's collective agreements for different personnel groups and in the general terms of employment for Senior Officers. After paid parental leave, the company supports and advises employees on how to apply for parental

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allowance from the Social Insurance Institution of Finland (KELA). Taking into account the specific risk factors in the working conditions of different personnel groups (such as radiation, noise, chemicals, and physical risks), employees are instructed and required to take leave in line with the time limits set by the Finnish Occupational Safety Act and aviation medical regulations. They are also instructed to apply for special parental allowance from the Social Insurance Institution of Finland (KELA).

Social protection in case of injury or incapacity for work

Norra's employees are covered by statutory occupational accident and occupational disease insurance, as well as by voluntary remote work insurance that supplements the statutory coverage. These insurance programmes and relevant social support schemes provide Norra employees with income security in case of injury or incapacity for work.

Social protection in the event of unemployment

Norra uses a transition security model for employees who are made redundant due to production or financial reasons. The transition security model provides employees with support and coaching to help them find new employment. In addition, various working time arrangements provide flexibility to support employees in their job search. When at least ten employees are made redundant, the company prepares a separate action plan together with the personnel. In accordance with the Employment Contracts Act, Norra offers employees who have been made redundant the opportunity to participate in employer-funded coaching or training to support employment, provided the employee has worked for Norra for at least five consecutive years before the end of their employment.

Social protection when transitioning to retirement

When an employee retires, the company's statutory earnings-related pension insurance provides income security for its employees. The company's Flight Crew members have a voluntary group pension insurance scheme, as agreed in the local agreement. This supplementary pension enhances the statutory pension security of Flight Crew members, as current regulatory requirements mandate that they stop working as Flight Crew before reaching the statutory retirement age. The company supports and advises employees on applying for an old-age pension when they reach retirement age. Employees may also choose to take partial old-age pension.

Social protection in challenging financial circumstances

Norra provides its employees with discretionary financial support in different challenging financial circumstances. Support is provided through interest-free Social Support loans. Social Support is a form of social credit that Norra offers its employees based on social criteria. The aim is to support Norra's personnel during severe personal financial crises. Social credit is intended for an employee's exceptional temporary need. An example of such a need is a temporary decline in the employee's financial situation caused by illness, unemployment or another similar reason beyond the employee's control, affecting either the employee or a dependent family member. The social support agreement sets an individual repayment plan for the employee, tailored to their personal circumstances.

Training and skills development metrics

Personnel training

Norra ensures its personnel maintain a high level of competence. Depending on their role, personnel attend both regular training mandated by authorities and other training aimed at developing their skills. The company's training plan is updated every autumn and approved by the company's HR Board. Department managers and supervisors plan training for

office and ground operations personnel. The training unit of the company's Flight Operations Department handles training planning for flying personnel.

Average number of training hours per employee

	Men	Women	All
Cabin Crew			33*
Flight Crew			55*
Senior Officers	12	9	11
Ground Controllers	28	13	27
Officers	21	12	14
Management Team	37	26	35

*No breakdown of training hours by gender is available for flying personnel for 2025. Training hours are determined by aviation authority regulations, the employee's work duties, and the aircraft type for which they are trained.

Personnel performance and career development assessment

Our employees regularly take part in different performance and career development assessments. The number and content of assessments differ between personnel groups. In 2025, Flight Crew members completed three simulator assessments. Cabin Crew had a feedback discussion with their supervisor. Senior Officers were set targets and given feedback by their supervisor in a feedback discussion. Officers took part in performance appraisal discussions. Ground Controllers had both a feedback discussion and a performance appraisal discussion during the year.

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Health and safety metrics

The reported data includes only Norra's own employees. The reported information is shown as the number of Norra's employees at the end of the reporting period, 31 December 2025.

All Norra employees are included in Norra's Occupational Safety and Health Action Plan. The Occupational Safety and Health Action Plan is based on Finnish occupational safety legislation, and Norra applies its principles to all its own employees.

Health and safety metrics

	2025
Percentage of own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines and which has been internally audited and (or) audited or certified by external party	100.0%
Number of fatalities in own workforce as result of work-related injuries and work-related ill health	0
Number of recordable work-related accidents for own workforce	59
Rate of recordable work-related accidents for own workforce, leading to sick leave (LTIF)	12
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to employees	148

All Norra employees are included in Norra's Occupational Safety and Health management systems. The company's Occupational Safety and Health management systems have been audited internally by the Occupational Safety and Health Committee and externally by the Social Insurance Institution of Finland (KELA).

In 2025, there were no deaths caused by work-related injuries or occupational health problems.

In 2025, there were 59 recorded work-related injuries, and the reported LTIF (Lost-Time Injury Frequency) was 12. LTIF is calculated as the frequency of occupational accidents per million working hours. It covers only those work-related accidents that led to absence from work, excluding the day of the accident.

In 2025, personnel as a whole lost a total of 148 working days due to work-related injuries and occupational accidents.

Work-life balance metrics

The reported data includes only Norra's own employees. All Norra employees are entitled to family leave, including parental and carer's leave for both birthing and non-birthing parents. Norra complies with Finnish labor legislation regarding parental leave. The headcount of Norra's own employees at the end of the reporting period on 31 December 2025 was used to calculate the percentage of employees who took family leave. All types of family leave were included in the calculation.

	2025
Percentage of employees entitled to take family-related leave	100.0%
Percentage of entitled employees that took family-related leave	17.2%
Percentage of entitled employees that took family-related leave, Male	8.5%
Percentage of entitled employees that took family-related leave, Female	8.7%

Family leave covers both employees who took full absence from work (special pregnancy leave, pregnancy leave, parental leave, and childcare leave) and those who took part-time absence from work (partial parental leave, partial childcare leave).

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Compensation metrics (pay gap and total compensation)

The reported data includes only Norra's own employees. The gender pay gap was calculated by comparing the average monthly salary of male and female employees. The calculation method follows section AR 98 of the ESRS S1 Own workforce standard. The calculation uses a fixed monthly salary as the basis, and does not include components made up of salary supplements. For this reason, the results are only indicative and do not fully represent total earnings or their differences. The differences in average monthly salaries between male and female employees are mainly due to variations in the personnel structure, not to unequal pay for employees in comparable roles. Among office personnel, the pay gap increases mainly because men hold most of the highest-paid positions, such as top management roles.

Gender pay gap

	2025
Gender pay gap (defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees)	62.8%

Gender pay gap by personnel group

	2025
Cabin Crew	2.5%
Flight Crew	-2.1%
Ground Controllers	-0.3%
Office	38.3%

The gender pay gap means the difference between the average pay levels of female and male employees, shown as a percentage of the average pay level of male employees.

Total remuneration ratio

	2025
Annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual)	5.6

Discrimination cases and complaints

In 2025, the data reported to Norra covered discrimination cases and complaints concerning its own employees that have been brought to the company's attention via official reporting channels. Norra fosters an open and safe workplace by encouraging employees to report inappropriate conduct, harassment, discrimination, and any other concerns or issues.

The reported figures do not include quality and deviation reports from the safety management system submitted via the aviation safety reporting system. These reports may include cases of discrimination. The company will improve sustainability reporting and gather data on all discrimination incidents and complaints within the company.

Employees have access to several reporting channels for raising concerns and reporting cases of harassment and discrimination. These channels are described in more detail in the chapter [Processes to remediate negative impacts and channels for own workers to raise concerns](#).

Discrimination cases and complaints

	2025
Number of incidents of discrimination, including harassment, during reporting period	0
Number of complaints filed through channels for people in own workforce to raise concerns	0

In this table, discrimination incidents and complaints mean suspected or reported cases of discrimination within the company.

Norra did not receive any fines, penalties, or compensation claims related to incidents or complaints reported during the reporting period. No serious human rights incidents or related fines, penalties, or compensation claims were identified.

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Workers in the value chain



Aviation operations are built on effective and seamless cooperation with workers in the value chain. Norra's value chain includes a broad range of stakeholders who each help ensure safe, efficient air traffic and its related services. From Norra's perspective, this includes core air traffic stakeholders such as upstream value chain workers responsible for aircraft maintenance, cleaning, catering, and ground operations, both at the home airport of Helsinki and at other airports in Norra's route network. The shared cornerstone for all actors is guaranteeing safety in every situation. This demands skilled employees and responsible working conditions across the entire value chain.

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

Material impacts, risks, and opportunities related to workers in the value chain have been identified as part of Norra's double materiality assessment. The assessment process is described in more detail in the section [Processes to identify and assess material impacts, risks, and opportunities](#).

Impacts, risks, and opportunities related to workers in the value chain have been assessed across Norra's extensive value chain, since these workers play a key role in Norra's business and its continuity. However, Norra currently does not have direct visibility into the terms of employment or working conditions of workers in the value chain. This topic has been identified as material to enable process development and improve the identification of potential negative impacts.

Accurate and disruption-free operations at Helsinki Airport are central to Norra's value creation. This calls for efficient processes and close cooperation with every participant in the value chain. Industrial actions or other disruptions in the supply chain can cause delays, which affect the passenger experience and may increase costs due to operational arrangements. Norra

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has an established management system for controlling these risks. The company applies risk management practices and maintains open dialogue with personnel and service providers in the value chain. This ensures that Helsinki Airport's services stay reliable in all conditions.

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

Working conditions of value-chain employees

Risk of strikes and other work-related disruptions in the value chain	Risk
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Policies related to workers in the value chain

Norra does not have a separate policy for workers in the value chain. However, the company's policies commit to defining clear areas of responsibility and obligations for subcontractors in aviation safety-related tasks, in line with the company's policies and processes. Written agreements are made for outsourced services. These agreements specify, among other things, safety-related services, compliance requirements, and the obligation to report safety-related matters to Norra. This ensures that value chain operators follow the company's safety requirements and help manage the company's risks.

Processes to engage with value chain workers about impacts

Norra communicates transparently and openly with its partners to ensure smooth and safe air traffic. The aviation operating environment is a shared workplace with multiple service providers and authorities. All value chain participants must comply with shared guidelines and operating principles. Norra discusses topics related to value chain services in regular collaboration meetings at both management and operational personnel levels. Norra also includes a requirement in its

contracts that subcontractors report on safety-related matters. This supports transparency and the ongoing improvement of collaboration.

In 2024, Norra conducted its first double materiality assessment, with stakeholder views playing a central role. Based on the assessment, Norra defined the material sustainability themes for the company's operations. These themes will direct the future priorities of its sustainability work. A more detailed description of the assessment appears in the section [Processes to identify and assess material impacts, risks, and opportunities](#). This ensures that Norra takes stakeholders' interests and concerns into account in its sustainability work and business decisions.

Processes to remediate negative impacts and channels for workers in the value chain to raise concerns

Norra requires its subcontractors, under contract, to report safety-related matters and incidents of non-conformance in accordance with Norra's instructions. Safety non-conformance can also be reported anonymously.

Workers in the value chain have access to a whistleblowing channel. Norra encourages all stakeholders to report any observed or suspected breaches of Norra's policies through this channel. The whistleblowing channel is available on Norra's public website. Reports of suspected misconduct or violations received via the channel are addressed without delay. All reports are handled anonymously and confidentially. A detailed description of the process for handling reports submitted via the Whistleblowing channel, and for protecting whistleblowers from retaliation, can be found in the Governance Information section under [Norra's whistleblowing channel](#).

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Affected communities



Regional transport is a vital part of the global air transport system, as it increases accessibility and links different regions with national and international networks. It supports regional development, business, and tourism, particularly in locations with limited mobility options. Regional air transport generates economic and social benefits, including jobs, investments, and improved connectivity. It also enhances cultural and commercial interaction. At the same time, operations have environmental and social impacts. We manage these impacts through responsible practices and collaboration with stakeholders.

Material impacts, risks, and opportunities related to affected communities

Material impacts, risks, and opportunities related to affected communities have been identified as part of Norra's double materiality assessment. The assessment process is described in more detail in the section [Processes to identify and assess material impacts, risks, and opportunities](#).

Regional flights are at the heart of Norra's business. Norra serves as Finnair's strategic partner and operates its regional flights, providing seamless connections from across Finland to Finnair's extensive international route network. Regional flying improves accessibility between municipalities in Finland, and supports business activity and tourism, especially in areas where alternative transport options are limited.

Norra's affected communities consist of people who live and work in areas served by Norra's flights. People who live and work near these areas may benefit from economic and social development, including new jobs, investments, improved connections, and tax revenue. They may also gain from intangible effects, such as cultural exchange and international cooperation. Many regions and municipalities see daily

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domestic flights as vital for maintaining their business operations.

Aircraft noise can reduce the well-being of people who live and work near airports. Norra's operations have a specific impact on the residents and communities of Helsinki Airport and its surrounding areas.

Norra also recognises the risk of stricter noise regulation. To further reduce aircraft noise at airports, authorities can introduce extra charges for take-offs and landings, and impose operational restrictions such as time limits for flights, in addition to existing regulations. These measures may increase Norra's operating costs and restrict its ability to operate, especially during early mornings and late evenings. This may affect Norra's ability to serve Finnair's route network efficiently, which could in turn influence Finnair's overall strategy for regional traffic.

Material impacts, risks, and opportunities related to affected communities

The economic, social and cultural rights of affected communities

Contribution to Finland's regional and economic development	Positive impact
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Aircraft noise

Noise pollution from own air transport operations	Negative impact
Risk of stricter noise reduction regulation	Risk



Policies for aircraft noise management

Norra is committed in its policies to reducing aircraft noise and complying with applicable laws, regulations, and procedures in every location where it operates.

Processes to engage with affected communities about impacts

Norra seeks to stay in touch with the communities where it operates via its external communication channels. Norra shares information on its website and posts updates on its official social media channels. Norra's Management Team holds overall responsibility for external communications.

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Aircraft noise

The Helsinki Airport aircraft noise management collaboration group (Collaborative Environmental Management, CEM) develops flight procedures together with Finavia, Fintraffic, and other airlines. As part of the CEM collaboration, the different stakeholders in the programme share information to help reduce aircraft noise.

Processes to remediate negative impacts and channels for affected communities to raise concerns

Norra provides a whistleblowing channel for affected communities. Norra encourages all stakeholders to report any observed or suspected breaches of Norra's policies through this channel. The whistleblowing channel is available on Norra's public website. Reports of suspected misconduct or violations received via the channel are addressed without delay. All reports are handled anonymously and confidentially. A detailed description of the process for handling reports submitted via the Whistleblowing channel, and for protecting whistleblowers from retaliation, can be found in the Governance Information section under [Norra's whistleblowing channel](#).

Taking action to address material risks to affected communities and approaches to managing these material risks

To further reduce aircraft noise at airports, authorities can introduce extra charges for take-offs and landings, and impose operational restrictions such as time limits for flights, in addition to existing regulations. These measures may increase Norra's operating costs and restrict its ability to operate, especially at night. This may affect Norra's ability to serve its route network efficiently and lead to revenue losses, which could in turn influence Finnair's overall strategy for regional traffic. To manage the risk, Norra collaborates closely with airports and

regulatory authorities and implements operational procedures that reduce aircraft noise in its operations.

Norra aims to mitigate noise impacts by working with relevant stakeholders, such as airports and air traffic control, to monitor noise levels and reduce noise during approaches and landings, for example by applying speed restrictions or the Continuous Descent Approach (CDA). In 2025, Helsinki Airport introduced a new speed limit for approaches, which has reduced aircraft noise during the approach phase.

Flight Crew members receive training in best practices for reducing aircraft noise as part of both initial and recurrent training. Norra is actively working with air traffic control and Finavia to increase the use of Continuous Descent Approaches at Helsinki-Vantaa Airport.

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Consumers and end-users



Passengers are central to Norra's operations, and the company's commitment to flight safety underpins all its activities. Norra operates over 50,000 flights annually and carries approximately 3 million passengers, aiming to provide an exceptionally safe and high-quality passenger experience. Flight safety is the company's top priority, and ensuring it directs all operational activities.

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

Material impacts, risks, and opportunities related to consumers and end-users have been identified as part of Norra's double materiality assessment. The assessment process is described in more detail in the section [Processes to identify and assess material impacts, risks, and opportunities](#).

End-users of Norra's services are passengers on flights operated by Norra. Norra operates as a commercial airline, so its success depends on strong trust and a good reputation among passengers. A passenger-centric approach is a key element of Norra's strategy and is essential for fulfilling its value proposition. The company actively works to prevent risks and negative impacts affecting customers. Although Norra's services do not cause direct health or safety risks, the company is committed to safeguarding passenger well-being throughout the flight.

Norra has identified material negative impacts and risks affecting its passengers, concerning both their personal health and safety as well as their social inclusion.

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

Personal safety of consumers and/or end users

Negative impacts on passengers' health and safety	Negative impact
Risk of epidemics and pandemics	Risk

Social inclusion of consumers and/or end users

Negative impacts related to failures in punctual departures	Negative impact
Distress and a sense of discrimination due to failure to ensure accessibility	Negative impact

Policies related to consumers and end-users

Norra complies with both national and international aviation legislation in all its operations, and follows the instructions and recommendations issued by national and foreign authorities.

Accessibility and non-discrimination in products and services

Policies on accessibility, inclusion, and non-discrimination are based on the company's operating guidelines and applicable legislation.

Punctuality and regularity

Punctuality and regularity are central focuses in Norra's operations. The purchase traffic agreement with Finnair also sets clear targets for both. They demonstrate the company's reliability and commitment to delivering a high-quality passenger experience. Norra monitors its operational performance using performance metrics, focusing on operator regularity and operator punctuality. Using these, the company assesses cancellations, transfers, and departure and arrival

delays caused by its own operations, and aims to direct improvement actions where they have the greatest impact.

Ensuring punctuality and regularity relies on proactive planning and close collaboration with Finnair. Key methods include proactive resourcing of Flight Crew, high-quality crew scheduling, and proactive management of traffic and crew deployment. With these actions, Norra seeks to minimise disruptions, ensure flights operate as agreed, and maintain a consistently high-quality passenger experience.

Health and safety

Norra's safety policy guides all safety work and establishes safety as the company's top priority in all operations. Norra aims to provide its passengers with reliable and safe air travel, and to ensure the highest level of service and customer satisfaction, so that expectations are met or exceeded. Norra achieves these goals by using safe operating procedures that comply with regulatory standards and fulfil the requirements agreed with customers.

Safety work is directed by Norra's Safety Management System (SMS) and Safety Management Manual (SMM). Safety management involves systematic risk management that covers flight operations, associated ground operations, aircraft maintenance, continued airworthiness, and crew well-being. This ensures a high level of safety.

The Safety Management System (SMS) is a key component of Norra's management system. The safety policy sets out how safety is incorporated into every aspect of the company's business. Norra develops and follows safe operating procedures, consistently maintaining the highest safety level that meets or exceeds regulatory standards and requirements agreed with customers. The company is committed to meeting the requirements of the European Union Aviation Safety

Agency (EASA), the IATA Operational Safety Audit (IOSA), and all other mandatory national and international legislation.

Safety management is not only an internal matter for Norra; the company works on safety together with multiple stakeholders across various forums that influence safety. This ensures adequate and comprehensive safety awareness across the entire value chain.

Epidemics and pandemics

Norra is ready to cooperate closely with health authorities and comply with current instructions and regulatory changes during epidemic or pandemic situations. In line with the operational guidelines approved by the Finnish Transport and Communications Agency Traficom, Norra actively monitors the global epidemiological situation and instructs its personnel on the necessary actions. Personnel working at the customer service interface receive training and clear instructions on how to safely handle suspected infectious disease cases. This ensures the well-being of both passengers and personnel in all situations.

Processes for engaging with consumers and end-users about impacts

Norra is responsible for operating its flights and providing in-flight passenger services. Finnair is responsible for ticket sales and other commercial customer relationships, including pricing and managing irregular situations. Customers primarily contact Finnair through its customer service channels. Norra is in direct contact with consumers and end-users during the flights it operates. Communication occurs face-to-face during the different phases of customer interactions. The aim of the interaction is to ensure a positive travel experience and to offer support throughout every stage of the flight when needed. Norra continuously monitors the Net Promoter Score (NPS) to

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assess how effective and functional its customer interaction is. NPS measures customer satisfaction.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Finnair is responsible for managing the commercial customer relationship, including handling irregular situations. Customers primarily contact Finnair through its customer service channels. Customer service centres serve as the main contact points for consumers and end-users, enabling Finnair to provide prompt and appropriate assistance.

Norra puts the health and safety of its passengers first. If Norra's own operations negatively affect the health or safety of customers, Norra accepts responsibility. It ensures that affected parties receive appropriate compensation, and that necessary actions and operational changes are made to prevent future cases. Consumers and end-users have access to a whistleblowing channel. Norra encourages all stakeholders to report any observed or suspected breaches of Norra's policies through this channel. The whistleblowing channel is available on Norra's public website. Reports of suspected misconduct or violations received via the channel are addressed without delay. All reports are handled anonymously and confidentially. A detailed description of the process for handling reports submitted via the Whistleblowing channel, and for protecting whistleblowers from retaliation, can be found in the Governance Information section under [Norra's whistleblowing channel](#).

Taking action to address material risks to consumers and end-users and approaches to managing these material risks

Safety and an outstanding passenger experience are key pillars of Norra's strategy. All our operations are founded on a high level of safety, and we develop our services starting from passengers' needs. Clear and flexible processes build trust among passengers. We monitor how well these principles are realised using a range of performance metrics. These include, for example, punctuality, passenger satisfaction, and both the number and quality of safety incidents. Norra continuously improves its operations to ensure that passengers' well-being, equity, and trust remain strong over the long term.

Outstanding passenger experience

Norra tracks passenger satisfaction and the quality of in-flight service each month using key indicators. Feedback collected from passengers and service experience metrics give current information about operational success and areas needing improvement. Based on the results, the company continuously improves its service and develops personnel skills to ensure a consistent, high-quality passenger experience on every flight.

Accessibility and non-discrimination in products and services

In 2025, Norra joined an accessibility working group made up of employees from various Finnair units. This group monitors process development to ensure it aligns with the objectives of Finnair's accessibility policy. We assess the effectiveness of actions taken to maintain and improve accessibility by tracking key metrics, particularly aNPS, which measures customer satisfaction among those who require special assistance. Reports of discrimination received from customers and authorities are monitored as well. This feedback shows which development actions are needed to ensure appropriate accessibility.

Punctuality and regularity

Norra's Operations Control Centre (OCC) continuously monitors the company's operational performance to prevent disruptions and minimise their impact. In 2025, the company took several actions to enhance operational readiness and improve punctuality and regularity.

Key development actions included updating the processes and operating instructions of the Operations Control Centre, as well as improving operational information flow between units. The company increased staffing at the Operations Control Centre at both Officer and Supervisor levels, which enhanced operational stability.

The company intensified cooperation with Finnair and other partners through regular meetings and operational communication. This improved the coordination of disruptions and enabled real-time responses. In addition, Norra advanced technological development by adopting new analytics solutions and operational monitoring tools, and by continuing to modernise the crew deployment system.

In 2025, Norra also enhanced proactive monitoring of punctuality and, when needed, took targeted actions in cooperation with Finnair and its subcontractors. These actions sought to ensure that operational performance consistently supports both the passenger experience and contractual targets.

Health and safety

Norra implements ongoing and systematic actions to ensure the health and safety of passengers across all its operations. Safety management relies on a Safety Management System (SMS), which covers ongoing monitoring, data recording, and assessment of the effectiveness of safety and security measures. The company fosters a strong safety culture by encouraging personnel to report observed risks and deviations

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without delay and in a proactive manner. Reporting channels are easily accessible so that reporting observations is straightforward. In addition, Norra ensures that personnel receive appropriate training and possess the necessary qualifications to carry out the required safety measures. Safety training is compulsory for all operational employees and specified other personnel groups, including new employees. To raise safety awareness and reinforce practices, we regularly publish communications targeted at personnel.

In 2025, Norra took part in Finnair's Safety & Security Week, which highlighted the importance of ongoing measures to guarantee health and safety. During the week, employees received training on first aid and the use of various safety equipment. The programme also included safety presentations and opportunities to speak with internal and external health and safety experts.



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Norra conducts its business safely, reliably, and responsibly. An honest and transparent way of working builds trust among our personnel, passengers and other stakeholders. It also helps the company achieve its strategic targets and supports the long-term development of the business. By following good governance and clear operating models, Norra ensures its operations comply with applicable laws, statutes, and regulatory requirements. Norra invests in a corporate culture that highlights operative excellence and agile ways of working throughout everyday tasks.

As part of Norra's governance practices, the company ensures the resilience of its management system and maintains continuous preparedness. The company ensures business continuity by anticipating risks, planning for continuity, and using clear operating models. Regular exercises and monitoring support preparedness, enabling Norra to operate efficiently even in exceptional situations.

Material impacts, risks, and opportunities related to business conduct

Material impacts, risks, and opportunities related to business conduct have been identified as part of Norra's double materiality assessment. The assessment process is described in more detail in the section [Processes to identify and assess material impacts, risks, and opportunities](#). This section covers business conduct, corporate culture, whistleblowing, and supplier relationship management, as well as information security and cybersecurity.

The assessment identified a material negative impact related to unethical business practices and violations of policies, which pose a risk of significant reputational damage. The company manages these risks through its policies, internal control mechanisms, whistleblowing channel, and whistleblower protection.

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For supplier relations, the assessment identified an opportunity to reinforce Norra's role as a preferred and trusted partner.

Regarding information security and cybersecurity, the assessment identified a risk of security breaches that could harm operational activities and erode stakeholder trust. Managing cybersecurity is a central element of the company's risk management.

Managing the material impacts and risks related to business conduct supports Norra's strategy execution and long-term business.

Material impacts, risks, and opportunities related to business conduct

Corporate culture, policies, and protection of whistleblowers

Unethical business conduct and violations of principles	Negative impact
Risk of reputational damage from unethical business conduct and violations of principles	Risk

Management of relationships with suppliers

Preferred partner for suppliers through good and fair relationship management	Opportunity
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Information security and cybersecurity

Risk of data security breaches	Risk
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Norra's business conduct policies and corporate culture

Norra's corporate culture

Norra is creating an outstanding aviation culture that is evident in the daily experiences of employees, passengers, business partners, and other stakeholders. The corporate culture is built on values defined together with employees – such as camaraderie, accountability, and the right to pursue excellence – which guide both everyday work and strategic decision-making. We strengthen the work community through open communication, mutual support, and a climate of trust. Norra believes that employees themselves shape the culture that underpins the company's operations. Good team spirit is reflected in the customer experience as safety, punctuality, and quality service. We continuously assess the development and effectiveness of our corporate culture using methods such as personnel surveys and feedback.

Norra's policies

Norra operates in the internationally regulated aviation sector, where strict safety requirements and regulatory authorities govern all activities. The company ensures compliance with requirements through internal guidelines, training, and supervision. Norra is committed to following both international and national legislation in all its operations, as well as the practices set out in the company's policies and guidelines.

Norra's whistleblowing channel

Norra is committed to operating honestly, responsibly, and in compliance with current legislation. Norra provides a whistleblowing channel that allows employees and other stakeholders to confidentially report any concerns about legal violations, suspected fraud or misconduct, or other unethical behaviour within Norra's operations. The reporting channel complies with the requirements of the EU Whistleblowing Directive and the national Whistleblower Act. All employees

who suspect or notice actions that breach Norra's Code of Conduct are encouraged to raise their concerns either by talking to their supervisor or by using Norra's whistleblowing channel, where reports can be submitted anonymously. External stakeholders can also access the whistleblowing channel on Norra's website.

The whistleblowing channel can be used to report breaches or suspected breaches in the following areas of EU or national law: public procurement; financial services, products and markets, and the prevention of money laundering and terrorist financing; product safety and compliance; transport safety; environmental protection; radiation and nuclear safety; food and feed safety, as well as animal health and welfare; public health; consumer protection; privacy and personal data protection, and the security of network and information systems; competition law; and corporate tax rules or arrangements for securing tax benefits.

An external service provider manages the whistleblower channel. The external service provider manages the technical implementation of the channel. They ensure the reporter's anonymity is protected and the report's information is securely safeguarded. Only designated individuals can access reports submitted through the service. Two designated people from the HR and Communications Department handle reports submitted to the channel and monitor the effectiveness of actions taken. All reports are handled confidentially.

The investigation process follows the principles of fairness, confidentiality, and consistency. Norra's designated person assesses the information included in the report received via the system, classifies the report, and starts the investigation process. The handlers discuss the report and the actions it requires. The handlers decide what additional information to collect, who within the company will take part in the investigation, and whether outside assistance is required.

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The handlers are responsible for ensuring that all reported cases are processed impartially and documented appropriately. The internal investigation launched in response to the report must be completed within three months of receiving the report. After completing the internal investigation, the handlers may consider the matter resolved. The investigation may also proceed externally to the company. The handlers produce an annual report on reports received via the whistleblower protection channel. The report specifies the number of reports and the categories to which the reports pertained. The report on the past year's events is presented to Norra's Management Team during the first quarter of the following year.

Norra follows the safeguards set out in the Whistleblower Act and does not tolerate any retaliation against individuals who report suspected violations in good faith.

Relationships with suppliers, including payment practices

Norra collaborates closely with Finnair, and Finnair supplies a significant share of the goods and services the company requires. Norra also makes many direct purchases itself for accommodation and transport services, telecommunications services, and various expert services, for instance. Norra manages its supplier relationships systematically and ensures that procurement meets the requirements set by legislation and the company's own principles. Norra builds its supplier relationships on trust and openness. We aim to maintain ongoing and transparent dialogue with suppliers.

Payment practices

Norra is committed in its policies to respecting the payment terms specified by the supplier on its invoice. Regardless of whether the supplier is a large domestic or foreign company, an SME, or another type of operator, payments are made on time.

Norra's payment process has two payment days each week. On the first payment day, Norra pays purchase invoices that fall due at the start of the week, and on the second payment day, it pays those due at the end of the week. This payment process enables the supplier to receive payment for their invoice as early as four days before the invoice's stated due date.

The due dates for purchase invoices from foreign suppliers are adjusted to account for possible delays between bank transfers. The original due date is manually moved forward by a few days to prevent payment from being delayed during processing.

Purchase invoices are primarily received through electronic invoicing. This delivery method accelerates both the receipt of invoices and the processing time in accounts payable. Purchase invoices are routed to a reviewer and, depending on the invoice amount, to one or two approvers. According to the payment process, reviewers and approvers receive reminders if the invoice due date is approaching and the necessary approvals are missing. These measures are intended to prevent all possible delays at every stage of the process.

Norra has not set a fixed payment term for its suppliers; instead, suppliers may determine their own payment terms. The most common payment terms for domestic suppliers are 14 or 30 days net. Foreign suppliers usually have a payment term of 30 days net. All purchase invoices in 2025 were paid within 30 days, with an average payment time of 17 days. The company has no ongoing legal proceedings related to payment delays.

By monitoring accounts payable and continually improving the payment process, the company aims to avoid payment delays.

Information security and cybersecurity

Policies related to information security and cybersecurity

Norra complies with all applicable legislation in its operations, including the Cybersecurity Act and the requirements set by the EU Commission Regulation on civil aviation security. The Cybersecurity Act applies to large and medium-sized companies, as well as operators of services critical to the functioning of society and the economy, regardless of their size. Air transport is a vital sector for society's security of supply and the transport system. For this reason, managing cybersecurity and information security forms an integral part of Norra's risk management and long-term business operations. Responsibilities and obligations related to information security are defined for all employees and subcontractors, in line with the company's policies. Information security requirements are incorporated into systems, services, and contracts.

Information security encompasses all Norra's data processing activities, including daily operational work in flight operations, ground operations, support functions, and office work. Norra's information systems follow best practices in information security, and both information security and data protection are included in all agreements.

Information security practices and guidelines play a key role in maintaining Norra's information security. The goal of information security practices and guidelines is to give employees clear instructions for acting securely in different situations. They also ensure that information security stays strong throughout all work processes. The company's IT manual presents information security practices and guidelines. It also outlines responsibilities and obligations related to information security. In addition, the company has separate data protection guidelines, a privacy statement, and policies on the use of artificial intelligence, all approved by the company's management. The IT manual, data protection guidelines, and

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privacy statement are provided exclusively in electronic form and published for all company employees on the company's intranet.

Data protection guidelines and privacy statement

Lawful and secure processing of personal data – that is, data protection – forms part of Norra's information security. Norra's privacy statement describes how Norra collects and processes employees' personal data. Norra's data protection guidelines and privacy policy are based on the Data Protection Act. Data protection aims to secure individuals' fundamental right to privacy and private life. Proper processing of personal data is required by law and aims to enhance the safety and comfort of both passengers and employees. The data protection guidelines cover the processing of personal data that Norra employees access through their work tasks. The EU General Data Protection Regulation governs the processing of personal data across the entire European Union. The guidelines aim to clarify the principles for processing personal data, specify the actions required by personal data legislation for personal registers, and safeguard the security of Norra employees' personal data.

Policies on the use of artificial intelligence

Norra has policies for the use of artificial intelligence. These define the permitted applications of AI and instruct employees on safe and appropriate use. Because artificial intelligence brings both opportunities and risks, the company must carefully assess the role and impact of AI solutions. These policies serve as high-level standard rules to ensure the safe and reliable use of artificial intelligence.

Actions related to information security and cybersecurity

Norra systematically manages information security and cybersecurity risks as an integral part of its business operations. The goal is to identify and manage information security risks so that they remain as low and acceptable as possible. Clear targets are set for information security performance, and their fulfilment is monitored. We continuously assess and develop information security management and operating models, and monitor their effectiveness through regular reviews. The company also ensures that staff have adequate skills to work securely and focuses on developing information security competence through training and guidance.

In spring 2025, Norra launched a new course on information security and cybersecurity for all personnel. The course offers a hands-on introduction to the fundamentals of information security and cybersecurity. The aim is to deepen understanding of information security threats, safe working methods, and each person's role in maintaining security. The training is conducted regularly and is now included in the induction programme for new employees.

In addition, Norra regularly carries out internal data protection audits to ensure that information security is maintained in systems and services. In the procurement of new systems, Norra ensures information security through contractual requirements. Suppliers must either have a certified information security management system or meet Norra's own information security criteria.

Under the Cybersecurity Act, Norra must report significant incidents to the national authority Traficom as soon as possible, and in any case within 24 hours of becoming aware of any such incident.

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