

Annual Report 2025

# Review by the Board of Directors

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# Review by the Board of Directors

Review by the Board of Directors .....	79
Sustainability statement .....	86
Key figures .....	146
Calculation of key figures .....	148

# Review by the Board of Directors 2025

The year 2025 marked a turning point for Neste, and the company succeeded in improving its financial performance. The beginning of the year was challenging for the company in many ways amidst depressed oil and renewable products markets. To change course, the company decisively initiated a group-wide performance improvement program, including strict capital discipline. During the year, Neste managed to streamline the operations, improve cost-competitiveness and strengthen the financial performance. While the program continues in 2026 and there is still a lot to do, Neste's operational efficiency and financial position have significantly improved. At the same time, the company is seeing favorable regulatory developments and increasing demand for renewable fuels in Europe.

Group full-year comparable EBITDA reached EUR 1,683 (1,252) million. The performance improvement program managed to reach EUR 376 million EBITDA run rate improvement in 2025. The program exceeded the target of EUR 350 million EBITDA run rate improvement one year ahead of the original timeline of the end of 2026. The free cash flow was EUR 759 (-341) million driven by improved business performance, tight working capital management and successful execution of the performance improvement program. This decreased the company's leverage ratio to 34.3% (36.1%), which is well below its financial target of 40%.

In Renewable Products, the full-year comparable sales margin was USD 411 (377)/ton and the segment's comparable EBITDA improved to EUR 764 (514) million. Sales volume in Renewable Products reached 4.1 (3.7) million tons. The renewable diesel market improved towards the end of the year.

In Oil Products, the full-year total refining margin was USD 14.0 (14.1)/bbl and comparable EBITDA increased to EUR 808 (633) million. Average refinery utilization rate of the Porvoo refinery was 90% (76%) in 2025.

In Marketing & Services, the comparable EBITDA for the full year reached EUR 111 (101) million.

Neste's strategic investment project in Rotterdam proceeded throughout 2025 and when completed the expanded refinery will be optimally positioned to support the growing European renewables market. The investment will increase Neste's total renewables annual nameplate production capacity to 6.8 Mt.

The Board has proposed a dividend payout of 0.20 euros (0.20) per share for the year 2025 to the Annual General Meeting.

Figures in parentheses refer to the financial statements for 2024, unless otherwise noted.

## The Group's results for 2025

Neste's full-year 2025 revenue totaled EUR 19,016 (20,635) million. Lower prices reduced revenue by EUR -1.2 billion. This was compensated by volume increases in both Renewable Products and Oil Products that resulted in EUR 2.0 billion positive impact. Currency exchange rates together with lower Oil Products trading volume and trading price had an approximately EUR -2.4 billion negative impact on revenue.

Group comparable EBITDA was EUR 1,683 (1,252) million. Higher sales volumes and margins supported Renewable Products with comparable EBITDA increasing to EUR 764 (514) million and higher sales margins increased Oil Products' comparable EBITDA to EUR 808 (633) million. Marketing & Services' comparable EBITDA rose to EUR 111 (101) million.

Group EBITDA was EUR 1,438 (1,005) million. Inventory valuation losses were EUR -159 (-359) million and changes in the fair value of open commodity and currency derivatives EUR -42 (84) million. Organizational restructuring related one-off costs booked totaled EUR 37 million. These one-off costs have been eliminated from comparable EBITDA. Profit before income taxes was EUR 199 (-113) million, and net profit was EUR 144 (-95) million. Earnings per share were EUR 0.19 (-0.12).

## Group key figures, MEUR

	2025	2024
<b>Comparable EBITDA</b>	1,683	1,252
- inventory valuation gains/losses	-159	-359
- changes in the fair value of open commodity and currency derivatives	-42	84
- capital gains/losses	4	-2
- other adjustments	-49	29
<b>EBITDA</b>	1,438	1,005

	2025	2024
<b>Revenue</b>		
Renewable Products	8,095	7,321
Oil Products	9,322	11,829
Marketing & Services	4,310	4,687
Others	166	125
Eliminations	-2,878	-3,326
Total	19,016	20,635

	2025	2024
<b>Comparable EBITDA</b>		
Renewable Products	764	514
Oil Products	808	633
Marketing & Services	111	101
Others	-1	-1
Eliminations	1	6
Total	1,683	1,252

	2025	2024
<b>Operating profit</b>		
Renewable Products	151	-347
Oil Products	325	345
Marketing & Services	82	72
Others	-62	-51
Eliminations	6	6
Total	503	25

## Financial targets

Neste's key financial targets are to reach EUR 350 million EBITDA<sup>1)</sup> run rate improvement by the end of 2026 from the performance improvement program, and to maintain the leverage ratio below 40%. At the end of December, the EBITDA run rate improvement from the performance improvement program reached EUR 376 million, and leverage ratio was well below the 40% target at 34.3%.

<sup>1)</sup> EBITDA improvement vs. 2024 baseline, including depreciation of leases

## Cash flow, investments, and financing

The Group's net cash generated from operating activities totaled EUR 1,747 (1,154) million in 2025. The increase to the previous year resulted from improved profitability and release of net working capital. The Group's net working capital in days outstanding was 34.7 (39.4) days on a rolling 12-month basis at the end of the year. Despite the continued capital expenditure in Rotterdam refinery expansion project, the Group's cash flow before financing activities improved to EUR 759 (-341) million during 2025.

MEUR	2025	2024
EBITDA	1,438	1,005
Capital gains/losses	-3	1
Other adjustments	139	-150
Change in net working capital	364	454
Finance cost, net <sup>1)</sup>	-180	-150
Income taxes paid	-11	-5
Net cash generated from operating activities	1,747	1,154
Capital expenditure	-936	-1,563
Other investing activities	-52	67
Free cash flow (Cash flow before financing activities)	759	-341

<sup>1)</sup> The Finance cost, net has been adjusted in 2025 to exclude the effect of exchange rate fluctuations on cash held in line with IAS 7. The comparison figures have been adjusted accordingly.

Cash-out investments excluding M&A were EUR 923 (1,552) million, and totaled EUR 939 (1,566) million including M&A in 2025. Renewable Products' investments amounted to EUR 753 (1,012) million, Oil Products' investments totaled EUR 139 (466) million and Marketing & Services' investments were EUR 24 (27) million. Investments in Others were EUR 23 (61) million. The comparison figure in both Group and Oil Products segment is impacted by the Porvoo turnaround 2024.

Neste completed several financing transactions in 2025. These included the issuance of a EUR 700 million green bond through its Euro Medium Term Note (EMTN) program and refinancing of its EUR 1,300 million syndicated multicurrency revolving credit agreement. Furthermore, Neste refinanced a total of EUR 500 million of debt.

Interest-bearing net debt was EUR 3,817 (4,192) million at the end of December 2025. The net debt ratio to rolling 12 months EBITDA was 2.7 (4.2). The average interest rate of borrowing at the end of December was 3.8% (3.3%) and the average maturity was 3.9 (4.1) years.

The Group's liquid funds and committed, unutilized credit facilities amounted to EUR 3,567 (2,880) million at the end of December. There are no financial covenants in the Group's loan agreements.

In accordance with its hedging policy, Neste hedges a large part of its net foreign currency exposure for the next 12 months, mainly using forward contracts and currency options. The most important hedged currency is the US dollar. At the end of December, the Group's foreign currency hedging ratio was approximately 52% of the sales margin for the next 12 months.

<b>US dollar exchange rate</b>	<b>2025</b>	<b>2024</b>
EUR/USD, market rate	1.13	1.08
EUR/USD, effective rate <sup>1)</sup>	1.10	1.09

<sup>1)</sup> The effective rate includes the impact of currency hedges.

## Segment reviews

Neste's businesses are grouped into three reporting segments: Renewable Products, Oil Products and Marketing & Services.

### Renewable Products

<b>Key financials</b>	<b>2025</b>	<b>2024</b>
Revenue, MEUR	8,095	7,321
Comparable EBITDA, MEUR	764	514
EBITDA, MEUR	718	242
Operating profit, MEUR	151	-347
Net assets, MEUR	8,863	9,064
Comparable sales margin, USD/ton	411	377

<b>Key drivers</b>	<b>2025</b>	<b>2024</b>
Renewable diesel reference gross margin <sup>1)</sup> , USD/ton	435	460
Biomass-based diesel (D4) RIN, USD/RIN	1.01	0.59
California LCFS Credit, USD/CO <sub>2</sub> ton	56	60
Waste and residues' share of total feedstock, %	95	90

<sup>1)</sup> RD Reference gross margin = 60% Argus HVO Class II less UCO CIF ARA adjusted by standard production yield, 40% Argus R100 UCO California less Argus UCO US Gulf Coast adjusted by standard production yield.

Renewable Products' 2025 comparable sales margin reached USD 411 (377)/ton. The segment's full-year comparable EBITDA rose to EUR 764 (514) million. Sales volumes increased and contributed EUR 420 million to comparable EBITDA year-over-year. However, due to higher feedstock costs, sales margin had a negative impact of EUR -164 million while a weaker US dollar had a negative impact of EUR -72 million on the segment's comparable EBITDA compared to the previous year. The segment's fixed costs were EUR 43 million lower than in 2024. The Blender's Tax Credit (BTC) contribution decreased from EUR 590 million in 2024 to EUR 27 million in 2025 as it was only applicable for SAF sales until September of 2025. Neste recognized EUR 126 million from Clean Fuel Production Credits (CFPC) in 2025.

In 2025, European end product markets were weak in the first half but strengthened during the second half of the year as the market began preparing for EU RED III (Renewable Energy Directive) implementations. At the end of the year, the renewable diesel benchmark HVO class II market price was nearly 700 USD/t and SAF 400 USD/t higher compared to previous year. Strong end of year performance was driven by constraints in production and stronger demand while imports stayed contained following the EU anti-dumping duties on Chinese biomass-based diesel introduced in February. For most of the year, SAF traded at a discount to HVO II except from August to November when SAF imports were at a lower level.

In the US, the year was characterized by uncertainty over regulation. Mid-year, markets strengthened on release of IRS's Clean Fuel Production Credit (CFPC) plans, but as the year progressed, uncertainty returned due to the delay in the finalization of the Environmental Protection Agency's (EPA) 2026 Renewable Fuel Obligation (RVO) proposal. This uncertainty impacted US product margins and feedstock demand negatively. As new regulation was indicated to favor North American feedstocks, demand for imported feedstocks reduced, which then increased the availability of feedstocks globally but the prices remained above the previous year's level.

<b>Production</b>	<b>2025</b>	<b>2024</b>
Renewable Diesel <sup>1)</sup> , 1,000 ton	3,313	2,981
SAF, 1,000 ton	841	526
Other products, 1,000 ton	89	87
Total	4,244	3,594
Utilization rate <sup>2)</sup> , own production, %	73	65

<sup>1)</sup> Including production from Martinez joint operation.

<sup>2)</sup> Based on nameplate capacity of 4.5 Mton/a of own operations

<b>Sales</b>	<b>2025</b>	<b>2024</b>
Renewable Diesel, 1,000 ton	3,175	3,225
SAF, 1,000 ton	867	412
Other products, 1,000 ton	93	92
Total	4,134	3,729
Share of RD & SAF sales volumes to Europe, %	72	51
Share of RD & SAF sales volumes to North America, %	28	49

## Oil Products

Key financials	2025	2024
Revenue, MEUR	9,322	11,829
Comparable EBITDA, MEUR	808	633
EBITDA, MEUR	639	667
Operating profit, MEUR	325	345
Net assets, MEUR	1,999	2,300
Total refining margin, USD/bbl	14.0	14.1

Oil Products' full-year comparable EBITDA rose to EUR 808 (633) million. The total refining margin averaged USD 14.0/bbl (14.1/bbl) in 2025 and had a negative impact of EUR -44 million on the comparable EBITDA compared to the previous year. The margin was weighed down by mild winter in the first quarter and higher supply costs in the second quarter but strengthened markedly during the second half of the year. Sales volumes were at a higher level and had a positive impact of EUR 187 million on the comparable EBITDA year-over-year. Currency exchange rates had a negative impact of EUR -31 million on the comparable EBITDA, and the segment's fixed costs were EUR 13 million lower than in 2024.

Crude oil prices were volatile during 2025 and Brent traded between USD 59/bbl and USD 82/bbl. Oil markets were affected by macro-economic uncertainties, geopolitical events, sanctions and OPEC's decision to unwind production cuts which drove global oil inventories up.

European refining margins were volatile but higher than in 2024. After a milder first half of the year, margins strengthened clearly during the second half as supply side drivers supported the markets. On average, both diesel and gasoline cracks were above their long-term averages in 2025. Key utility prices did not change materially year-over-year.

Production	2025	2024
Refinery		
Production, 1,000 ton	11,278	9,652
Utilization rate, %	90	76
Refinery production costs, USD/bbl	6.5	6.7

Sales from in-house production, by product category (1,000 t)	2025	%	2024	%
Middle distillates <sup>1)</sup>	5,688	48	4,626	46
Light distillates <sup>2)</sup>	4,461	38	3,877	38
Heavy fuel oil	1,087	9	1,079	11
Other products	632	5	565	6
Total	11,868	100	10,147	100

<sup>1)</sup> Diesel, jet fuel, heating oil, low sulphur marine fuels

<sup>2)</sup> Motor gasoline, gasoline components, LPG

Sales from in-house production, by market area (1,000 t)	2025	%	2024	%
Baltic Sea area <sup>1)</sup>	7,778	66	6,606	65
Other Europe	3,665	31	2,401	24
North America	142	1	443	4
Other areas	284	2	697	7
Total	11,868	100	10,147	100

<sup>1)</sup> Finland, Sweden, Estonia, Latvia, Lithuania, Poland, Denmark

## Marketing & Services

Key financials	2025	2024
Revenue, MEUR	4,310	4,687
Comparable EBITDA, MEUR	111	101
EBITDA, MEUR	109	100
Operating profit, MEUR	82	72
Net assets, MEUR	215	198

Marketing & Services segment's full-year comparable EBITDA was EUR 111 (101) million. Lower market demand driven by the mild winter early in the year decreased sales volumes and had a negative impact of EUR -4 million. Unit margins increased and had a positive impact of EUR 11 million on the comparable EBITDA. Prior year margins were negatively impacted by inventory losses from decreased global fuel prices. The segment's fixed costs were EUR 1 million higher year-over-year.

Sales volumes by main product categories, million liters	2025	2024
Gasoline, station sales	615	608
Diesel, station sales	1,526	1,549
Heating oil	773	842

Net sales by market area, MEUR	2025	2024
Finland	3,336	3,657
Baltic countries	974	1,030
Total	4,310	4,687

## Shares, share trading, and ownership

Neste's shares are listed at Nasdaq Helsinki Ltd. The share price closed the year at EUR 19.41 up by 60.0% compared to the end of 2024. At its highest during the year, the share price reached EUR 20.22, while the lowest share price was EUR 6.79. Market capitalization was EUR 14.9 billion as of 31 December 2025. An average of 2.02 million shares were traded daily, representing 0.3% of the company's shares.

At the end of December 2025, Neste held 936,999 treasury shares. Neste's share capital registered with the Trade Register totaled EUR 40 million, and the total number of shares was 769,211,058.

The Board of Directors has authorizations to issue and buy back shares. The authorizations shall remain in force for 18 months from the decision taken by the AGM on 25 March 2025. The Board is authorized to decide the issue and purchase of 23,000,000 (2.99%) Company shares.

As of 31 December 2025, the State of Finland owned directly 44.2% (44.2% at the end of 2024) of outstanding shares, foreign institutions 26.4% (29.8%), Finnish institutions 17.7% (14.8%) and households 11.7% (11.2%).

### Largest shareholders as of 31 December 2025

Shareholder	Shares	% of shares
Prime Minister's Office	340,107,618	44.22
Ilmarinen Mutual Pension Insurance Company	24,891,508	3.24
Varma Mutual Pension Insurance Company	23,018,591	2.99
Elo Mutual Pension Insurance Company	10,430,000	1.36
The Finnish Social Insurance Institution	6,100,272	0.79
The State Pension Fund	5,000,000	0.65
Kurikan Kaupunki	4,652,625	0.60
OP-Finland	3,056,233	0.40
Nordea Bank Abp	2,709,897	0.35
St1 Nordic Corporation	2,530,000	0.33
Keele Oy	2,400,000	0.31
Säästöpankki Kotimaa Mutual Fund	1,983,290	0.26
Veritas Pension Insurance Company Ltd.	1,852,429	0.24
Danske Invest Finnish Equity Fund	1,821,556	0.24
Seligson & Co OMX Helsinki 25 Exchange Traded Fund (ETF)	1,557,010	0.20
OP-Henkivakuutus Ltd.	1,520,272	0.20
Nordea Pro Finland Fund	1,515,680	0.20
Society of Swedish Literature in Finland	1,453,153	0.19
OP-Finland Index Fund	1,427,182	0.19
Nordea Fennia Fund	1,341,634	0.17
20 largest shareholders total	439,368,950	57.12
Nominee registered	201,854,362	26.24
Other shares	127,987,746	16.64
Total	769,211,058	100.00

### Breakdown of share ownership as of 31 December 2025

By the number of shares owned

No. of shares	No. of shareholders	% of shareholders	Total no. of shares	% of shares
1–100	91,574	47.11	3,579,639	0.47
101–500	63,261	32.55	16,086,792	2.09
501–1,000	18,742	9.64	13,856,331	1.80
1,001–5,000	17,850	9.18	37,235,165	4.84
5,001–10,000	1,849	0.95	12,873,619	1.67
10,001–50,000	934	0.48	17,417,620	2.26
50,001–100,000	81	0.04	5,505,247	0.72
100,001–500,000	50	0.03	10,182,146	1.32
500,001+	41	0.02	652,474,499	84.82
Total	194,382	100.00	769,211,058	100.00
of which nominee registered	11	0.00	201,854,362	26.24

By the owner sector	% of shares
State of Finland	44.2
Non-Finnish shareholders	26.4
Households	11.7
General government	10.0
Financial and insurance companies	3.2
Corporations	3.0
Non-profit organizations	1.6
Total	100.0

## Corporate governance

Neste's Corporate Governance Statement 2025 is issued separately from the Review by the Board of Directors. The Corporate Governance Statement can be found, in addition to the Annual Report, at [www.neste.com/investors/corporate-governance](http://www.neste.com/investors/corporate-governance).

The control and management of Neste Corporation is divided between shareholders, the Board of Directors, and the President and Chief Executive Officer (CEO). The Annual General Meeting of Shareholders appoints the Board of Directors based on a proposal made by the Shareholders' Nomination Board. The term of office of the Board of Directors will expire at the end of the next Annual General Meeting of Shareholders (AGM) following its election. Neste's President and CEO is appointed and expelled by the Board of Directors.

Changes to the company's Articles of Association can be made at the General Meeting of Shareholders based on a proposal by the Board of Directors.

Neste Corporation's Annual General Meeting (AGM) was held on 25 March 2025 in Helsinki. The AGM adopted the company's Financial Statements and Consolidated Financial Statements for 2024 and discharged the Board of Directors and the President & CEOs from liability for 2024. The AGM resolved to reject the remuneration report for 2024. The resolution made is advisory. The AGM supported other proposals presented to the meeting.

## Dividend payment

The AGM approved the Board of Directors' proposal that a dividend of EUR 0.20 per share would be paid on the basis of the approved balance sheet for 2024.

The dividend was paid to shareholders registered in the shareholders' register of the Company maintained by Euroclear Finland Oy on the record date of the dividend payment, which was 27 March 2025. The dividend was paid on 3 April 2025.

## Composition and remuneration of the Board of Directors

In accordance with the proposal made by the Shareholders' Nomination Board, the AGM confirmed the number of members of the Board of Directors at eight.

The AGM decided that the following were re-elected to serve until the end of the next AGM: John Abbott, Nick Elmslie, Just Jansz, Conrad Keijzer, Pasi Laine and Sari Mannonen. Anna Hyvönen and Essimari Kairisto were elected as new members.

Pasi Laine was elected as the Chair and John Abbott as the Vice Chair of the Board.

The AGM decided on the remuneration to the Board for the term starting at the end of the 2025 AGM and ending at the end of the 2026 AGM as follows:

- Chair: EUR 165,000;
- Vice Chair: EUR 90,000;
- Chairs of the Committees: EUR 90,000 if the person does not simultaneously act as Chair or Vice Chair; and
- Members: EUR 75,000.

The AGM decided on the remuneration for participation in Board or committee meetings:

- EUR 1,000 for meetings, or
- EUR 2,000 for meetings, if the member travels to the meeting outside his/her home country
- The meeting fee for meetings held over the telephone or through other means of data communication is paid according to the fee payable for meetings held in the member's home country.
- In addition, compensation for expenses is paid in accordance with the Company's travel guidelines.

The AGM decided that a portion of 40% of the fixed annual fee would be paid in the form of shares and the remainder in cash. Meeting fees would be paid in cash. The shares were purchased directly on behalf of the Board members within two weeks as of the

first trading day of the Helsinki Stock Exchange following the publication of the interim report for the period 1 January to 31 March 2025. If the shares had not been purchased and/or delivered based on a reason pertaining to the Company or the Board member, the fee would have been in cash in its entirety. The Company was responsible for any transfer tax potentially levied on the purchase.

## Company Auditor

In accordance with a proposal by the Board of Directors, KPMG Oy Ab, Authorized Public Accountants, was re-elected as the company's Auditor, with Authorized Public Accountant Leenakaisa Winberg as the principally responsible auditor for Neste Corporation, until the end of the next AGM. Payment for their services shall be made in accordance with their invoice approved by the Company.

## Sustainability Reporting Assurer

In accordance with a proposal by the Board of Directors, KPMG Oy Ab, Authorized Sustainability Audit Firm, was re-elected as the company's Sustainability Reporting Assurer, with Authorized Public Accountant, Authorized Sustainability Auditor Leenakaisa Winberg as the principally responsible sustainability reporting assurer for Neste Corporation, until the end of the next AGM. Payment for their services shall be made in accordance with their invoice approved by the Company.

## Authorizing the Board of Directors to decide the buyback of Company shares

The AGM approved the authorization, under which the Board is authorized to decide the purchase of and/or take as security a maximum of 23,000,000 Company shares using the Company's unrestricted equity. The number of shares shall be equivalent to approximately 2.99% of the Company's total shares. The Buyback authorization shall remain in force for eighteen (18) months from the decision taken by the AGM.

## Authorizing the Board of Directors to decide on share issue

The AGM approved the authorization, under which the Board is authorized to take one or more decisions on the issuance of new shares and/or the conveyance of treasury shares held by the Company, provided that the number of shares thereby issued and/or conveyed totals a maximum of 23,000,000 shares, equivalent to approximately 2.99% of all the Company's shares. The authorization shall remain in force for eighteen (18) months from the decision taken by the AGM.

## Innovation

Neste's innovation expenditure totaled EUR 63 (86) million in 2025. The focus was on supporting and enhancing the competitiveness of Neste's businesses. We continue to strengthen our innovation capabilities to grow and diversify our current raw materials base and elevate refinery performance and safety.

## Main events published during 2025

On 13 February, Neste announced that it started a performance improvement program and updated its financial targets and capital allocation, including dividend for the year 2024. The goal of the performance improvement program is to secure the company's strong market position and cost competitiveness in renewable fuels and to enhance Neste's financial performance. The program targets a total of EUR 350 million EBITDA run rate improvement by the end of 2026, of which EUR 250 million from operational costs. In order to further simplify its operating model and increase internal efficiency, the company conducted change negotiations. Also, the schedule and costs of the Rotterdam refinery expansion project were re-evaluated.

On 13 February, Neste announced that Jori Sahlsten, M.Sc. (Paper Technology), had been appointed as Executive Vice President, Oil Products, and member of the Neste Leadership Team as of 13 February 2025. Markku Korvenranta will continue as Executive Vice President, Chief Operating Officer, and member of the Neste Leadership Team.

On 13 February, Neste announced that Eeva Sipilä, a member of the Board of Directors and the Chair of the Audit Committee of Neste Corporation, had announced her resignation from the Board of the company as of 13 February. The reason for the resignation was her appointment as Neste's Chief Financial Officer.

On 9 June, Neste announced that the following members had been appointed to Neste's Shareholders' Nomination Board: Director General Maija Strandberg of the Ownership Steering Department in the Prime Minister's Office of Finland, as the Chair, and Senior Vice President, Investments Timo Sallinen of Varma Mutual Pension Insurance Company and Head of Equities Annika Ekman of Ilmarinen Mutual Pension Insurance Company, as its members. Pasi Laine, the Chair of Neste's Board of Directors, acts as an expert to the Nomination Board.

On 19 December, Neste announced that the Shareholders' Nomination Board had forwarded to the Board of Directors of the Company its proposals to the 2026 AGM. The Nomination Board proposed that Pasi Laine should be re-elected as the Chair of the Board of Directors and that John Abbott continue as the Vice Chair of the Board. In addition, the current members of the Board, Nick Elmslie, Anna Hyvönen, Just Jansz, Essimari Kairisto, Conrad Keijzer ja Sari Mannonen were proposed to be re-elected for a further term of office. The Nomination Board further proposed that the Board should have nine members and that Simo Sääskilahti should be elected as a new Board member. The Nomination Board also presented its remuneration proposal which is part of a program for bringing Board remuneration to market level by 2026 as part of a long-term bringing of Board remuneration to a level comparable to those of peer companies. Through this proposal the program has been concluded.

## Events after the reporting period

There have been no significant events after the reporting period.

## Personnel

Neste employed an average of 5,214 (5,796) employees during 2025, of which 2,040 (2,153) were based outside Finland. At the end of December, the company had 4,848 (5,481) employees, of which 1,987 (2,133) were located outside Finland.

## Risk Management

Neste considers risk management an integral part of daily management processes and good corporate governance. Systematic risk management practices are the means to ensure that Neste is successful in achieving its strategic targets and business objectives and can maintain continuous operations. Neste's risk management framework and processes are aligned with internationally recognized best practices: the COSO Enterprise Risk Management framework; and the International Standard for risk management, ISO 31000.

Neste's risk management framework and risk management principles have been defined in the Corporate Risk Management Policy, approved by the Neste Board of Directors. The Risk Management Policy is supplemented by risk management principles, guidelines and instructions for specific risk disciplines. Communication regarding the most important risks takes place during the strategic planning and performance management cycle. Formal risk reporting is directed to the business management and function management teams, the Neste Leadership Team, the Audit Committee and the Board of Directors.

## Risks related to Neste's business

Geopolitical tensions are creating market turbulence that risk leading to significant shifts and fragmentation in global trade. The continuing war in Ukraine and related sanctions as well as geopolitical tensions in the Middle East and recently in South America create uncertainty in the global oil and related products markets. This could reduce demand and market prices for Neste's Oil Products and Marketing & Services segments. Also, renewable product pricing includes a diesel price linked component, which tends to fluctuate faster than feedstock prices. Abrupt changes in diesel prices without a corresponding change in input costs would impact renewable product margins.

The uncertainty around trade sanctions such as tariffs in global trade continues, and they could affect economic growth, create an uneven playing field and/or hurt the demand and supply balance in markets Neste operates in.

Regulatory development in the EU or individual member states or in the US may adversely affect Neste's Renewable Products business, and such regulatory risks can materialize rapidly. Recent regulatory developments like mandate increases and transposition of RED III into national laws can drive up demand for renewables. This development may also include risks relating to decreased mandates or acceptance of various feedstocks, which can have a negative impact on Neste. Emphasizing national energy security may lead to prioritization of domestic supply sources and companies, which may reduce feedstock availability and create pressure on feedstock prices as well as create an unfair competitive environment, and hence, impact Neste's business.

Other risks potentially affecting Neste's financial results in the next 12 months include scheduled or unexpected shutdowns or delays in the ramp-up of production at Neste's refineries, delays or cost overruns in Rotterdam refinery expansion project, potential strikes, cyber and IT related risks, counterparty risks and outcome of legal disputes.

For more detailed information on Neste's risks and risk management, please refer to the Annual Report and the Notes to the Financial Statement.

## Sustainability risks

The Neste Corporate Risk Management Policy and supporting principles, requirements and processes also apply to sustainability risks.

For more detailed information about Neste's risks and risk management, please refer to Risk Management in the Annual Report's Governance chapter and the Notes to the Financial Statements. For more information about Neste's sustainability risks, please see Sustainability statement (CSRD).

## Outlook

### Guidance for 2026

- Renewable Products' sales volumes in 2026 are expected to be approximately at the same level as in 2025.
- Oil Products' sales volumes in 2026 are expected to be lower than in 2025 due to the planned maintenance turnaround.

### Additional information

- The Group's full-year 2026 cash-out capital expenditure excluding M&A is estimated to be approximately EUR 1.0–1.2 billion.

## Dividend distribution proposal

The parent company's distributable equity as of 31 December 2025 amounted to EUR 3,192 million, and there have been no material changes in the company's financial position since the end of the financial year. The Board of Directors proposes a dividend payout of EUR 0.20 per share based on the approved balance sheet for 2025 to the Annual General Meeting. The dividend shall be paid in one installment to shareholders registered in the shareholders' register of the Company maintained by Euroclear Finland Ltd on the record date for the dividend payment, which shall be 27 March 2026. The Board proposes to the AGM that the dividend would be paid on 7 April 2026.

The proposed dividend EUR 0.20 per share represents a yield of 1.0% (at year-end 2025 share price of EUR 19.41). The total dividend payout in 2026 would amount to approximately EUR 154 million.



# Sustainability statement

General information .....	87
ESRS 2 General disclosures .....	87
Environmental information .....	97
EU taxonomy .....	97
E1 Climate change .....	103
E2 Pollution .....	114
E4 Biodiversity and ecosystems .....	117
E5 Resource use and circular economy .....	120
Social information .....	123
S1 Own workforce .....	123
S2 Workers in the value chain .....	130
Governance information .....	134
G1 Business conduct and compliance .....	134
Appendixes .....	140

# Sustainability statement

## General information

### ESRS 2 General disclosures

#### General basis for preparation of the Sustainability statement

Neste's Sustainability statement covers the entire Neste Group. The scope of consolidation is in principle the same as for the Financial statements. Entities that are subsidiaries or controlled similarly to subsidiaries are fully included in the reporting scope. The scope of consolidation differs from the Financial statements for joint operations, joint ventures and associates, including Martinez Renewables: they are excluded from sustainability reporting as they are outside of Neste's operational control and hence treated as part of Neste's value chain and excluded from information related to Neste's own operations. Individual exceptions are communicated in the reporting principles of specific metrics. See the Accounting policies of the consolidated Financial statements for more information on the scope of consolidation.

The Sustainability statement is published annually as part of the Review of the Board of Directors. Similarly to the Financial statements, the reporting period of the Sustainability statement is the financial reporting year, January 1–December 31, 2025. The Sustainability statement is prepared in accordance with the sustainability reporting standards referred to in Chapter 7 of the Finnish Accounting Act and with Article 8 of the Taxonomy Regulation. An independent third party, KPMG Oy Ab, has assured the Sustainability statement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board IAASB.

The disclosed sustainability information is based on Neste's double materiality assessment. The assessment covers Neste's value chain, including upstream and downstream, and its own operations. Value chain information is included in this report where material. For policies, targets and action plans disclosed in this report, Neste specifies which parts of the value chain or own operations it covers. The reporting principles for metrics are described at the end of each topic-specific section.

Neste has not omitted information corresponding to intellectual property, know-how or the results of innovation or used the exemption from disclosure of impending developments or matters in the course of negotiation in its Sustainability statement.

#### Disclosures in relation to specific circumstances

Neste applies same time horizons as in its Performance Management Process to align its Sustainability statement with relevant internal processes such as financial outlook, risk management and strategy. Short-term is defined as 1 year, medium term is defined as 1-3 years, and long term as 3+ years. Medium- and long-term time horizons applied differ from the time horizons defined in ESRS 1 General principles.

Specific circumstances applying to metrics are disclosed in the reporting principles of relevant metrics. The figures in the tables in the Sustainability statement are subject to rounding, which may cause some rounding inaccuracies in aggregate column and row totals.

#### Governance

##### The role of the administrative, management and supervisory bodies

**The Board of Directors of Neste Corporation ("Board")** is in charge of sustainability matters of major significance to the Neste Group including, among other things, the approval of the long-term ambition and targets, adoption of Neste's statutory sustainability reports and reviewing the sustainability performance. The Board also approves Neste Group's corporate values, policies and the most important corporate principles, including Neste's Sustainability Policy, which outlines Neste's approach to managing material sustainability impacts, risks and opportunities. The outcome of the double materiality assessment is reviewed by the Board. The Board has the ultimate responsibility for sustainability matters and risk oversight of Neste.

**The Audit Committee of the Board ("Audit Committee")** monitors and supervises the statutory sustainability reporting process including the related controls, the assurance of the sustainability report and risk management of Neste Group. The Annual General Meeting selects the Sustainability Reporting Assurer. The responsibilities of the Board and Audit Committee are reflected in the Charter for the Board and the Audit Committee, respectively, and in the Sustainability Policy.

Proposal for the composition of Neste's Board of Directors is prepared annually by the Shareholders' Nomination Board consisting of three members appointed by the company's three largest shareholders. The Chair of the Board of Directors acts as an expert to the Nomination

Board. The Nomination Board's most important responsibility is to ensure that the Board of Directors and its members have sufficient expertise, knowledge and qualifications for the company's needs, including capabilities related to sustainability matters. In the preparation of its proposal the Nomination Board pays attention to achieving a good and balanced gender distribution and diversity. Having balanced representation of genders in the Board of Directors is one element of diversity. The company takes into account the goal set out in the Finnish Companies Act to have at least 40 per cent (including the relevant rounding rules) of the under-represented gender in the Board of Directors.

The members of the Board of Neste have diverse backgrounds in terms of education and experience in different professional and industrial fields and in business operations and management, all of which include competences on sustainability-related issues. The diversity of the Board of Directors is also supported by experience in industrial fields and markets that are strategically significant for Neste. Several of the Board members have experience within industries and products relevant for Neste, including e.g., biofuels, chemicals and fossil fuels. The members of the Board have gained an understanding of business conduct matters through various leadership and board positions in other companies. The members of the Audit Committee especially have knowledge and experience of accounting practices, preparation of financial statements and statutory sustainability reporting. The Board also calls on external expertise if and when it deems such expertise appropriate. Neste's Board does not include employee representatives.

**Neste's President and CEO** prepares and makes necessary proposals to the Board on key sustainability matters in particular related to corporate strategy, including the long-term ambition and targets for the sustainability vision. The **Neste Leadership Team** approves Neste's sustainability priorities and sustainability is represented in the Leadership Team through Executive Vice President, People & Culture. Responsibility for monitoring individual corporate sustainability targets is shared among the members of the Neste Leadership Team and reviewed periodically by the Leadership Team. Neste's sustainability work is managed by the **Sustainability, Human Resources, and Safety units** and is implemented across all applicable business areas and functions, supported by internal policies, principles and standards.

Material sustainability risks are identified and managed in quarterly risk reviews as part of annual Enterprise Risk Management (ERM) process at Neste in line with the Corporate Risk Management Policy and supporting principles and standards.

### Information provided to and sustainability matters addressed by Neste's administrative, management and supervisory bodies

Neste's Board of Directors reviews the sustainability performance at least once a year. Other sustainability topics are also regularly reviewed by the Board. Risks are reported to the Board of Directors at least two times a year as a part of strategy and performance planning processes. Formal risk reporting is directed to the business management teams, Neste Leadership team, Audit Committee and Board of Directors. Material sustainability risks are presented to the Audit Committee in connection with the risk reviews. The Audit Committee supervised the statutory sustainability reporting process throughout the year. In April 2025, the Board reviewed the results of Neste's double materiality assessment.

In February 2025, the Board decided to revise the timeline for the earlier announced transformation of Neste's Porvoo refinery from crude oil refining into a renewable and circular solutions refining hub. In the short term, the focus of the Porvoo refinery transformation is planned to be on energy efficiency and renewable hydrogen while other components of the plan are considered to be delayed. At the Board's annual strategy meeting, discussions included among other things the impact of climate and ESG-related regulation on Neste's business,

taking into account the company's current financial position and streamlined investment portfolio. In December the Board decided to revise some of Neste's climate targets, as further elaborated under [E1 Climate change](#), to reflect current financial position and the phased transformation of the Porvoo refinery. The Board recognized that the transition from crude oil to processing renewable and circular raw materials will be calibrated against market demand, legislative developments and technological readiness. These topics addressed by the Board are especially important in relation to Neste's material climate-related impacts, risks and opportunities, and also indirectly linked to other material environmental topics.

Safety is addressed by the Board at every meeting, also relating to Neste's material impacts, risks and opportunities on the health and safety of its own employees. The Board also reviewed and approved the Modern Slavery Statement 2025. The annually published Modern Slavery Statement details the steps Neste is taking to identify, assess and address the risks of modern slavery in its business operations and supply chains.

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

Neste's Remuneration Policy aligns remuneration with the successful delivery of its long-term strategic and sustainability goals. The Neste Board of Directors is responsible for deciding the remuneration to the President and CEO and the members of the Neste Leadership Team, and for deciding the long- and short-term incentive plans. The Personnel and Remuneration Committee is responsible for drafting the remuneration-related matters and proposals for the Board.

Neste's climate commitments are connected with the remuneration of Neste's key personnel through performance metrics in Neste's long-term incentives (LTIs). In 2025, the main performance metric is renewable fuels sales volume with the weight of 60% of the total plan.

It is linked to Neste's climate targets related to carbon handprint, with customers replacing fossil fuel with renewable fuels produced by Neste. Combined Greenhouse Impact represents 20% of LTI in the Performance Share Plan 2023–2025 and 2024–2026 and includes greenhouse gas emissions (GHG) emission reductions achieved with Neste renewable products by customers and GHG emissions from Neste production. These metrics are also directly related to the climate targets, as described under the [E1 Climate change](#) section. Additionally, measures related to the improvement in both process and personnel safety constitute at least 10% of the short-term incentives' measures in 2025.

### Risk management and internal controls over sustainability reporting

Neste's assurance functions consist of risk management, compliance and internal controls. Neste is committed to accurate and transparent sustainability reporting. Neste manages risks within this process through a robust internal control system. Neste's internal control framework is based on the Committee of Sponsoring Organizations framework (the "COSO framework", 2013), it covers both financial and sustainability reporting and it promotes a unified approach to risk management and control activities.

Internal control requirements, as defined in the Internal Control Principle and Controls over Financial and Sustainability Reporting Standard, are implemented across all levels of the organization. Operational management owns the risks and controls related to sustainability data within their respective areas, while Group Finance has overall responsibility for the Sustainability statement, mirroring the financial reporting responsibility structure. Specialists in sustainability reporting provide guidance and support.

Specification of administrative, management and supervisory bodies	2025	2024
Number of executive members	0	0
Number of non-executive members	8	9
Average percentage of male board members, %	63.9	69.3
Average percentage of female board members, %	36.1	30.7
Board members diversity (average female to male ratio), %	56.9	44.6
Percentage of independent board members, %	100	100

Neste has assessed and prioritized risks based on their potential impact on the reliability of its reporting, considering factors such as data materiality, process complexity and potential for human error. The company continues to mature in its sustainability reporting processes and systems, however some data collection and input still rely on manual processes. Risks identified include accuracy and completeness of the data. These risks are mitigated by clearly defined roles and responsibilities for data collection and reporting, and a common reporting guideline provided in Neste manual for CSRD reporting. Neste has implemented preventive and detective control activities based on the identified risks, including reconciliation controls and review controls for quantitative and qualitative sustainability data.

Internal Control function monitors the control performance and assesses control adequacy. Deficiencies are promptly reported to responsible parties for corrective action, with appropriate escalation to management and the Audit Committee. This process is consistent with financial reporting control deficiency reporting.

## Strategy, business model and value chain

### Neste's business model and value chain

Neste has three business areas: Renewable Products, Oil Products and Marketing & Services. The company provides renewable and fossil fuels for transportation, aviation, marine and other industrial uses, as well as renewable and circular solutions for the polymers and chemicals industries. Neste has an extensive network of fuel stations with expanding service offering, such as EV charging, in Finland and in the Baltics.

Neste's upstream value chain consists of the sourcing of raw materials for production, indirect procurement and the sourcing of materials and products for trading. Indirect procurement includes the sourcing, purchasing,

contract and supplier management in energy and utilities, technical materials and services, chemicals and catalysts, IT and professional services, and land logistics categories. Neste's own operations cover refining and raw material pre-treatment activities as well as commercial operations related to both sales and supply operations, planning and development. Downstream activities include the further processing, distribution and use of Neste's products. In addition, investment projects and asset maintenance, logistics and storage, distribution of products, innovation and R&D activities and end-of-life management occurs across Neste's value chain.

The value chains of Renewable Products, Oil Products and Marketing & Services, including their key inputs and outputs are further described below.

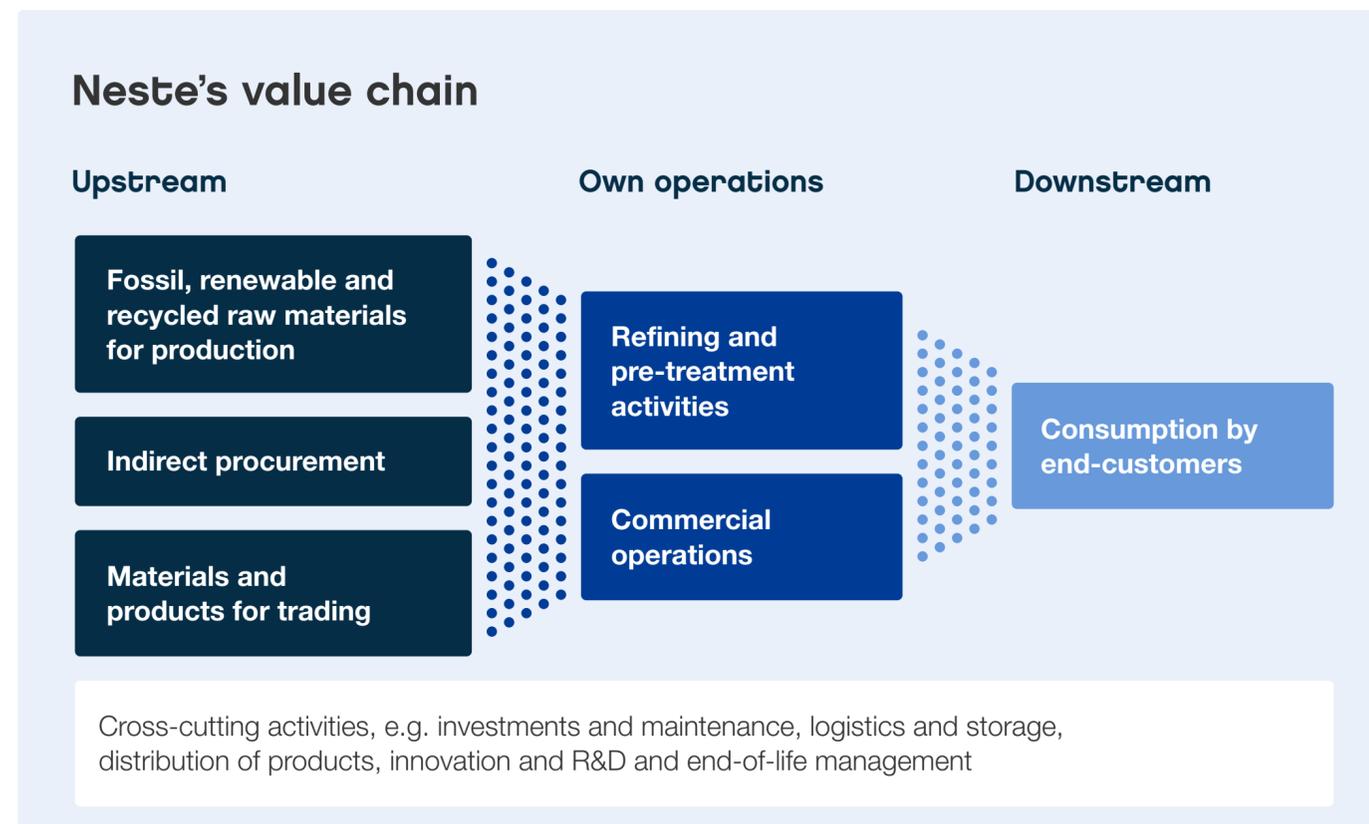
**Renewable Products** segment produces, markets and sells renewable diesel, sustainable aviation fuel (SAF) and related solutions to business customers, as well as domestic and international wholesale markets. Neste's renewable raw material portfolio consists of a wide variety of waste and residue raw materials and smaller amounts of vegetable oils. Neste sources renewable raw materials globally. Neste produces renewable fuels at its refineries in Finland, the Netherlands and Singapore, as well

as through a joint operation with Marathon Petroleum in Martinez, California, the US, entirely from renewable raw materials. Significant customer groups include transportation and logistics companies, retailers, airlines, and aviation fuel suppliers. In 2025, the main market areas were Europe and North America.

**Oil Products** segment produces, markets and sells high-quality oil products and related services for the road transportation, heavy machinery, agriculture, aviation and marine sectors, as well as products for the oil and petrochemical industries. In 2025, the company's major crude oil and fossil raw material sources were Norway, the US and the Netherlands. Neste's oil products are refined at Neste's refinery in Porvoo, Finland. The main customers for the Oil Products include retailers and distributors, oil majors and trading companies and companies marketing lubricants and solvents. The main market areas in 2025 were the Baltic Sea area and Europe.

**Marketing & Services** segment markets and sells high-quality products and associated solutions to its customers in Finland and the Baltic countries. The most important customers include consumers, transport service providers, customers in the aviation, shipping, industrial and agricultural sectors, municipalities and heating fuel customers. Transport fuels and electric vehicle charging services are marketed through Neste's own station network in Finland and the Baltics.

Neste's Supplier Code of Conduct outlines the basic requirements Neste expects its suppliers and their first tier suppliers, contractors and business partners to adhere to and implement throughout their businesses. The Supplier Code of Conduct and Neste's approach to the development of its supplier relationships is further described under [G1 Business Conduct](#).



## Revenue by segment

Total revenue by segment, MEUR	2025	2024
Renewable Products	8,095	7,321
Oil Products	9,322	11,829
Marketing & Services	4,310	4,687
Others	166	125
Eliminations	-2,878	-3,326
<b>Total revenue</b>	<b>19,016</b>	20,635

Reporting principles for revenue metrics are included in Note 5 Revenue in the Consolidated Financial statements. Reporting reconciles with Neste's operating segments as defined by IFRS 8.

## Headcount

Headcount of employees by geographical areas	2025	2024
Europe	3,719	4,203
Americas	778	878
Asia-Pacific	439	493
<b>Total employees</b>	<b>4,936</b>	5,574

Reporting principles for headcount are included under [S1 Own workforce](#).

## Revenues from and CapEx related to fossil fuel activities

Neste has operations in the fossil fuels sector and revenues from these sectors are presented in the adjacent table. Revenue from gas is reconciled with fossil gas-related activities presented as part of the EU taxonomy reporting. Neste has no revenue from coal and taxonomy-aligned economic activities related to fossil gas.

CapEx related to fossil fuel activities, MEUR	2025	2024
Significant CapEx for oil-related economic activities	97	387
Significant CapEx for gas-related economic activities	0	0

Breakdown of total revenue from fossil fuel, MEUR	2025	2024
Revenue from oil	11,114	13,442
Revenue from gas	136	142
<b>Total revenue from fossil fuel sector</b>	<b>11,249</b>	13,584

## Neste's strategy and relation to sustainability matters

Sustainability work at Neste is guided by the Neste sustainability vision covering climate, biodiversity, human rights, as well as supply chain and raw materials:

- **Climate:** Neste enables its customers to reduce their carbon footprint, while reducing its own.
- **Biodiversity:** Neste aims to drive a positive impact on biodiversity and achieve a nature positive value chain by 2040.
- **Human rights:** Neste strives to create a more equitable and inclusive value chain by 2030, in which everyone works with dignity.
- **Supply chain & raw materials:** Neste drives a safe and healthy workplace, fair labor practices and increased commitment to sustainability across the supply chain.

Creating solutions to mitigate climate change and accelerating the shift to a circular economy are the key elements of Neste's strategy that relate to or affect material sustainability matters.

- Neste's renewable products enable customers to reduce their GHG emissions. Renewable diesel, SAF and renewable feedstocks for polymers and chemicals offer GHG reductions over the product life cycle compared to fossil alternatives. Neste's target is to enable its customers to reduce their GHG emissions with Neste's renewable and circular solutions by at least 20 Mt CO<sub>2</sub>e annually by 2030.

- Neste's oil refinery in Porvoo, Finland has significant potential to process renewable and recycled raw materials and Neste's long-term plan is to gradually transform the oil refinery into a renewable and circular solutions refining hub. Neste finalized the construction of a new upgrading unit for processing recycled raw materials, such as liquefied waste plastic, and production ramp-up will commence in 2026. The Porvoo oil refinery is using existing refinery units to enable co-processing of renewable and recycled raw materials with fossil raw materials in the conventional refining process. With the help of co-processing, the company can produce additional renewable and recycled volumes.

Neste believes that by executing its strategy and acting in line with its Sustainability and Safety visions and its Code of Conduct, the company's strategy and business model have resilience towards identified material impacts, risks and opportunities. Resilience to material negative impacts and risks is supported by Neste's ongoing impact and risk management, safety leadership and due diligence activities, as described in the topical sections. Neste pursues material environmental opportunities through for example, offering renewable and circular solutions to its customers and diversifying its raw material portfolio in line with its strategy. These actions also support the mitigation of and response to the effects of relevant risks and impacts.

## Material impacts, risks and opportunities

The adjacent table summarizes material impacts, risks and opportunities for Neste. More detailed descriptions of each material impact, risk and opportunity, including how they relate to Neste's business model, value chain and strategy, are provided in the topical sections under Environment, Social and Governance. Compared to 2024, there are five new material impacts, risks and opportunities, including a new material sub-topic under G1 Business conduct. There are only minor changes to the descriptions of other impacts, risks and opportunities.

The sectors in which Neste operates are subject to both opportunities and risks arising especially from demand for renewable fuels, regulatory changes impacting either renewable fuels or fossil fuels, technological shifts and growing global competition.

The increasing global pressure to reduce greenhouse gas emissions is primarily a positive driver for Neste's business. However, the macroeconomic uncertainty has prompted governments to re-evaluate the affordability and funding of renewable energy. Changing regulation presents both an opportunity and a threat to Neste's business. Neste benefits from increased support for bio-fuels and renewable fuels. However, changes in regulation also create uncertainties and may influence the speed at which the demand for renewable products develops and raw materials sources are accepted. Transitioning to a low carbon economy could also include economic and regulatory adjustments that affect e.g. emission trading schemes, technology requirements and valuation of assets.

In the renewable fuels market, fuel supply and demand are impacted by changing regulation and trade politics, both on the feedstock and product side. Increasing nationalism and protectionist regulation may further fragment global renewable markets, leading to more regionalized incentive schemes. Also geopolitical and trade policy tensions may disrupt international trade, financial markets, and supply chains.

Oil & Gas sector specific sustainability impacts include greenhouse gas (GHG) emissions from the extraction and use of fossil resources, the use of fossil raw material based products and potential pollution and land-use change effects related to sourcing and extraction of fossil resources. Neste does not own or operate any oil exploration or drilling sites or activities, which significantly reduces its exposure to direct environmental risks.

Most of the short-term risks and opportunities identified under climate change, biodiversity and circular economy relate to changes in regulation or policies. In 2025, there were several regulatory developments, both new proposals and modifications, which are mainly expected to have a financial impact in the coming years. Of the regulatory changes that materially impacted Neste in 2025, a key one was the change in US federal fuel incentive tax credits to support local producers, replacing the previous incentive to support local blenders. The change narrowed eligibility only to Neste's joint operation in the US and affected Neste's financial performance in 2025. None of the other environmental risks and opportunities alone are considered to have had a material impact on 2025 financial position, financial performance and cash flows.

In 2025, Neste did not have financially material compliance breaches, or safety incidents (PSE tier 1 events, >50 MEUR impact) that resulted in negative health and safety impacts (TRI) on its own workforce. The order subject to a penalty imposed by the authorities in 2024 on the Rotterdam refinery related to flaring has been suspended in a legal injunction procedure in December 2025. Neste is applying for amendment to the environmental permit on this topic. Investigations initiated by the authorities during 2023 and 2024 concerning Rotterdam refinery's flaring and volatile organic compound (VOC) emissions are still pending.

Material topics		Summary of material impacts, risks and opportunities for Neste as evaluated in the double materiality assessment
<b>Environment</b>		
<b>Climate change</b>	<b>Impacts</b>	<ul style="list-style-type: none"> <li>Neste's renewable and circular solutions enable GHG emissions reductions by Neste's customers, reducing dependency on fossil resources (positive impact)</li> <li>GHG emissions across Neste's value chain contribute to global warming and climate change (negative impact)</li> <li>Neste's operations in an energy-intensive sector lead to environmental impacts associated with energy consumption (negative impact)</li> </ul>
	<b>Risks</b>	<ul style="list-style-type: none"> <li>Uncertainty related to regulatory support, protectionist policies or voluntary demand for renewable and circular solutions can lead to e.g. lower sales volumes</li> <li>Regulatory uncertainty related to raw materials acceptance can cause limitations to the raw materials pool</li> <li>Not meeting climate commitments can result in increased operational costs, reputational damage or impact access to capital (new in 2025)</li> </ul>
	<b>Opportunities</b>	<ul style="list-style-type: none"> <li>Expanding operations into new raw materials, products and technologies can create business opportunities</li> <li>New regulations, policy support or more ambitious climate targets can result in demand growth in renewable and circular solutions</li> <li>Strengthening Neste's current raw materials portfolio can lead to improved competitiveness and adaptability towards climate change</li> <li>Gradual transformation of Neste's business model and operations can strengthen resilience to decreased fossil demand, allow leveraging existing assets for renewable and circular production and potentially have positive impact on capital access and cost (new in 2025)</li> </ul>
<b>Pollution</b>	<b>Impacts</b>	<ul style="list-style-type: none"> <li>Substances of concern are hazardous and may have a negative impact on human health and/or the environment, if effective risk management measures are not in place or fail (negative impact)</li> </ul>
<b>Biodiversity and ecosystems</b>	<b>Impacts</b>	<ul style="list-style-type: none"> <li>The use of waste and residue raw materials for renewable products can contribute to positive impacts for biodiversity in the upstream value chain (positive impact)</li> <li>Upstream extraction and potential incidents across the supply chains of raw materials and utilities can damage terrestrial and marine ecosystems, habitats and species or result in soil and marine pollution (negative impact)</li> </ul>
	<b>Risks</b>	<ul style="list-style-type: none"> <li>Biodiversity loss mitigation and increased nature-related requirements can pose a transition risk for Neste's renewable raw material pool</li> </ul>
	<b>Opportunities</b>	<ul style="list-style-type: none"> <li>Using waste and residue raw materials and novel vegetable oils from regenerative agricultural practices can reduce land use impacts from agriculture and lead to e.g. access to new markets or strengthened brand value</li> </ul>

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

The disclosed sustainability information is based on Neste's double materiality assessment which is reviewed annually. The double materiality assessment (DMA) was divided into four phases based on general steps outlined in ESRS 1 General principles. The phases of the double materiality assessment are the same as in 2024 and the assessment built on the previous year's results.

### 1. Value chain mapping

The purpose of the value chain mapping was to describe Neste's value chain and related business activities in upstream, own operations and downstream. The focus was on specific activities, business relationships, geographies or other factors that could give rise to a heightened risk of adverse impacts. The value chain mapping was conducted by internal stakeholders and the results of the mapping were validated internally. There have not been material changes in the value chain mapping since 2024.

Neste's double materiality assessment covered the whole value chain including activities in the upstream, own operations and downstream. In the double materiality assessment process, all identified business activities were screened to identify actual and potential impacts, risks and opportunities (IROs).

### 2. Impact assessment

The purpose of the impact assessment was to identify actual and potential, positive and negative impacts of Neste business activities. The impact assessments covered the entire value chain and it considered inputs from Neste's ongoing due diligence activities and impact assessments.

For each relevant business activity identified in the value chain mapping phase, the driver of impact as well as the effect of the impact on the environment or people were defined. In addition, each impact was characterized (positive/negative, actual/potential, time horizon), and linked to relevant ESRS sub-topics, and sub-sub topics, if applicable. The time horizons defined in ESRS for medium and long term were modified in the assessment to be in line with time horizons defined in Neste's relevant internal processes such as financial outlook, risk management and strategy. The time horizons used by Neste are: short 1 year, medium 1–3 years, and long 3+ years.

### 3. Financial assessment

The purpose of the financial assessment was to identify risks and opportunities that materially influence or may reasonably be expected to influence Neste's financial development, performance, position, cash flows, access to finance, and cost of capital. The identified risks or opportunities were characterized and their associated financial impact to Neste was described. In the financial assessment, the time horizons used were modified similarly as in the impact assessment. The identified risks and opportunities were linked to relevant ESRS sub-topics and sub-sub topics, if applicable, and to geographical and value chain location (upstream, own operations, downstream or cross-cutting).

The assessment utilized already identified risks and opportunities as defined and managed within Neste's Enterprise Risk Management (ERM). Furthermore, consideration was given to any potential significant risks or opportunities that may arise as a result of the impacts and dependencies that were identified during the impact materiality assessment phase.

Material topics	Summary of material impacts, risks and opportunities for Neste as evaluated in the double materiality assessment	
<b>Environment</b>		
<b>Resource use and circularity</b>	<b>Impacts</b>	<ul style="list-style-type: none"> <li>Use of virgin raw materials leads to depletion of finite resources (negative impact, new in 2025)</li> </ul>
	<b>Risks</b>	<ul style="list-style-type: none"> <li>Competition, trade policies or import restrictions may reduce availability or create price volatility for raw materials</li> </ul>
	<b>Opportunities</b>	<ul style="list-style-type: none"> <li>Circular economy drivers, such as increased raw material availability and new market openings, can create opportunities for Neste</li> </ul>
<b>Social</b>		
<b>Own workforce</b>	<b>Impacts</b>	<ul style="list-style-type: none"> <li>Hazardous processes in Neste's operations could directly impact own employees' health and safety (negative impact)</li> </ul>
	<b>Risks</b>	<ul style="list-style-type: none"> <li>Workplace injuries and/or ill-health of Neste's employees can lead to various financial effects from one-off costs to prolonged production disruptions</li> </ul>
	<b>Opportunities</b>	<ul style="list-style-type: none"> <li>With a robust safety management system Neste aims to prevent injuries as well as reduce sick leaves and downtimes caused by incidents and accidents</li> </ul>
<b>Workers in the value chain</b>	<b>Impacts</b>	<ul style="list-style-type: none"> <li>Workers in Neste's upstream supply chains for wastes and residues and third-party workers at Neste refineries may face risks of forced labor (negative impact)</li> </ul>
<b>Governance</b>		
<b>Business conduct and compliance</b>	<b>Impacts</b>	<ul style="list-style-type: none"> <li>Neste's commitment to ethical business practices has a positive impact on stakeholders of the company (positive impact, new in 2025)</li> <li>Neste drives improved working conditions, ethical business practices and safety in its supply chain (positive impact)</li> </ul>
	<b>Risks</b>	<ul style="list-style-type: none"> <li>Unethical behavior or breaches of Neste's Code of Conduct or applicable legislation or regulations can lead to adverse legal, financial or reputational consequences (new in 2025)</li> </ul>

#### 4.1 Scoring

In the scoring phase, impacts were scored based on a combination of severity (scale, scope, irremediability) and likelihood. The materiality of a negative impact is determined by its severity: For actual negative impacts, materiality is based on severity alone while for potential negative impacts, materiality is based on severity weighted by likelihood. Severity is determined by three factors: scale (magnitude), scope (reach), and irremediable character of the impact. The materiality of a positive impact is determined by its scale and scope: for actual positive impacts, materiality is based on scale and scope alone while for potential positive impacts, materiality is based on scale, scope, and likelihood.

Risks and opportunities were assessed based on a combination of likelihood and magnitude of financial effects. Magnitude was considered as estimated annual impact on operating profit; for risks, worst case annual impact while for opportunities a best case approach was applied. Financial impacts were assessed based on risk assessment scales in Neste Corporate Risk Management Policy.

#### 4.2 Determination

In the determination phase, thresholds were set to determine which IROs are material for Neste. Threshold for impacts considers that both severity and likelihood need to be high for impact to be deemed material. For risks and opportunities, the threshold was aligned with Neste's ERM risk rating and set so that considerable risks and opportunities were deemed material. Topics, which did not exceed the set materiality threshold but are seen as central for Neste's strategy and core values, or hold importance due to external stakeholder interest and strong industry relevance, are deemed material based on a separate management decision. Resulting material IROs, including the applied thresholds, were validated with internal stakeholders to ensure material topics and IROs are representative of Neste's business.

The thresholds set in the double materiality assessment are not static and may be subject to periodic review and adjustment.

#### 4.3 Validation

Neste Leadership Team and Board of Directors reviewed the outcomes of the double materiality assessment. Each double materiality process step was also validated with a group of internal subject matter experts, and Neste Leadership Team and Board of Directors were kept informed throughout the assessment. Neste has defined internal controls to ensure the fulfillment of relevant requirements when conducting the double materiality assessment. The controls aim to ensure valid, complete and accurate results. Through the controls, it is ensured that the views of key experts, stakeholders and decision-makers are taken into account, and that a pre-defined approach is followed consistently.

#### 4.4 Integration with Neste processes

Sustainability-related risks are identified and managed in quarterly risk reviews as a part of Enterprise Risk Management (ERM) at Neste in line with the Corporate Risk Management Policy and supporting principles and standards. The assessment considers short-, medium- and long-term perspectives. The prioritization of risks is based on the risk assessment scales according to the Neste Corporate Risk Management Policy.

#### Stakeholder engagement

The double materiality assessment was supported by internal sustainability experts and informed by Neste's ongoing due diligence activities. Stakeholders' views were indirectly taken into account in different ways during the assessment process. For example, Neste's ongoing due diligence activities and related engagement with affected stakeholders act as input to the double materiality assessment. Neste also engages in dialog and collaboration with local communities and production site neighbors, covering environmental, social, and safety impacts. Neste's approach to stakeholder engagement is further described under the Interests and views of stakeholders section of this report.

#### Specific considerations on topical assessments

Neste continuously identifies and assesses relevant topic-specific impacts, risks and opportunities. These ongoing processes serve as inputs for Neste's double materiality assessment and when determining material topics and sub-topics.

Neste sites are responsible for identifying, assessing and, where relevant, monitoring environmental impacts related to their operations, including issues related to emissions, surface water and waste generation. At the Porvoo refinery, regular environmental monitoring is conducted to comply with the requirements of the site's environmental permit issued by local authorities, and Neste actively participates in the monitoring activities. Similar monitoring is in place at selected retail sites in Finland, Estonia, Lithuania, and all sites in Latvia. In Rotterdam and Singapore, Neste sites are located on broad industrial areas together with other companies' sites. Authorities conduct environmental monitoring outside the site fence line of these industrial areas. In cases where specific impact monitoring requirements are not stipulated by local authorities or legislation, expert judgment is used to assess potential impacts. The Environmental Management Principle is further described under the [E2 Pollution](#) section of this report.

Environmental, social and business conduct related impacts, risks and opportunities in the value chain are further identified through ongoing due diligence activities. Neste's due diligence process and controls for counterparty screening and monitoring are described in the [G1 Business Conduct](#) section of this report. The further identification of climate and biodiversity related impacts, risks and opportunities are also described in the related topical chapters.

### Interests and views of stakeholders

Neste aims for continuous dialog with its stakeholders and regularly seeks external views on its activities across the value chain. The company's key stakeholders include those who the business can influence as well as those that have the opportunity to influence Neste. Where relevant, stakeholders and their views are taken into account when developing e.g., Neste's strategy, sustainability ambition and targets. Neste's short term priorities include improving its financial performance and

competitiveness, in line with stakeholder expectations on Neste as an economic operator. Neste continuously aims to improve operational efficiency through reliable and safe operations, with focused actions on ensuring the safety of its own employees and all other workers on its sites. Examples of key topics of interest for different stakeholder groups are provided in the adjacent table.

Through the Sustainability Policy, Neste is committed to engaging and collaborating with its stakeholders and taking an active role in multi-stakeholder initiatives

to help develop solutions for mitigating climate change. Neste also provides stakeholders with relevant information on its value chains and solutions to secure acceptability of Neste offerings in the key markets.

The Stakeholder Advisory Panel has been established to promote discussion between Neste and its stakeholders on subjects such as the company's operations, business development, and changes in its operating environment. The Advisory Panel, which includes representatives from members of the Parliament of Finland

and Neste's personnel, ensures that the management and supervisory bodies are kept informed about stakeholders' views, particularly on sustainability-related impacts.

Stakeholders	Purpose and key topics	How engagements are organized	How outcomes are taken into account by Neste
<b>Suppliers, contractors and value chain workers</b>	<ul style="list-style-type: none"> <li>Implementing Neste Supplier Code of Conduct and Responsible Sourcing Principles</li> <li>Improving supplier engagement and collaboration</li> <li>Driving performance improvements and positive impacts across sustainability topics</li> <li>Ensuring availability of raw materials, products and services</li> <li>Collecting information on Neste's scope 3 emissions</li> <li>Increasing the understanding of sustainability risks in the value chain</li> </ul>	<ul style="list-style-type: none"> <li>Information sharing and capacity building such as sustainability workshops, trainings and seminars, meetings and newsletters</li> <li>Collaboration initiatives</li> <li>Evaluating new and existing raw material suppliers</li> <li>Monitoring and auditing supplier sustainability, incl. worker interviews, worker voice surveys</li> <li>Site-level grievance channels at Neste refineries designed to address concerns of contracted and subcontracted workers, incl. migrant workers</li> </ul>	<ul style="list-style-type: none"> <li>Ensuring Neste sourcing process adheres to own sustainability policies and principles</li> <li>Ensuring supplier due diligence complies with upcoming regulations, such as the Corporate Sustainability Due Diligence Directive</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>Engaging employees in executing company strategy</li> <li>Increasing understanding of Neste business outlook and priorities</li> <li>Supporting Neste's values based culture and ways of working (Code of Conduct)</li> <li>Promoting continuous improvement and learning</li> <li>Promoting health, safety and wellbeing</li> </ul>	<ul style="list-style-type: none"> <li>Employment relations and local cooperation committees or work councils</li> <li>Active, regular communication on Neste business outlook, strategic priorities and financial results</li> <li>Goal setting and development plans</li> <li>Development and wellbeing discussions</li> <li>Measuring employee engagement via surveys</li> <li>Encouraging employees to participate in voluntary work</li> </ul>	<ul style="list-style-type: none"> <li>Proactive and systematic communication, listening and feedback</li> <li>Discussing results from surveys and agreeing on measures and actions plans</li> <li>Follow-up actions agreed based on employee engagement surveys</li> <li>Ensuring employee cooperation in line with local labor laws and collective agreements</li> </ul>
<b>Customers</b>	<ul style="list-style-type: none"> <li>Enabling customers to reduce their GHG emissions with renewable and circular solutions</li> <li>Enhancing products and service quality and availability</li> <li>Informing and educating on Neste's products, sustainability, safety and operations</li> <li>Cooperating e.g. on innovation and R&amp;D</li> </ul>	<ul style="list-style-type: none"> <li>Meetings, newsletters and training</li> <li>Product related technical information, such as fact sheets</li> <li>Customer satisfaction surveys</li> <li>Engaging in joint marketing and communications</li> <li>Partnerships to reduce customers' carbon footprint</li> <li>Bilateral and consortium R&amp;D projects</li> <li>Arranging site visits</li> </ul>	<ul style="list-style-type: none"> <li>Responding to the customer needs by providing high-quality products and solutions, and securing supply chains</li> <li>Forming partnerships and co-creating new solutions and services, educating experts and de-risking technology investments</li> </ul>
<b>Consumers</b>	<ul style="list-style-type: none"> <li>Enhancing product, service and operations quality and availability</li> <li>Providing information about products, their safety, pricing, raw materials and the value the products provide</li> </ul>	<ul style="list-style-type: none"> <li>Gathering insights via surveys</li> <li>Sharing up-to-date information on webpages</li> <li>Working with local distributors</li> <li>Running advertising campaigns</li> <li>Responding to consumer inquiries</li> </ul>	<ul style="list-style-type: none"> <li>Expanding availability of renewable products and related services</li> </ul>

Stakeholders	Purpose and key topics	How engagements are organized	How outcomes are taken into account by Neste
<b>Local communities</b>	<ul style="list-style-type: none"> <li>• Providing employment and cooperation opportunities</li> <li>• Sharing information on health and safety matters, site investments and development projects</li> <li>• Understanding environmental and social impacts on local communities</li> </ul>	<ul style="list-style-type: none"> <li>• Engaging via newsletters, meetings, websites and social media</li> <li>• Arranging site tours for interest groups</li> <li>• Collaborating with local authorities and city representatives</li> <li>• Conducting surveys with local communities and stakeholders impacted by the Porvoo refinery operations</li> <li>• Providing complaint channels for local communities</li> </ul>	<ul style="list-style-type: none"> <li>• Community development initiatives</li> <li>• Maintaining open dialogue with local communities</li> <li>• Encouraging and enabling employee volunteering for local charities</li> </ul>
<b>NGOs</b>	<ul style="list-style-type: none"> <li>• Understanding NGO views on Neste and sharing Neste perspective</li> <li>• Collaborating on relevant sustainability matters</li> </ul>	<ul style="list-style-type: none"> <li>• Dialogue with selected NGOs</li> <li>• Collaborating on joint projects for smallholder support</li> <li>• Transparent reporting on sustainability performance and grievances</li> </ul>	<ul style="list-style-type: none"> <li>• Developing Neste's sustainability approach and processes</li> </ul>
<b>Capital markets: Investors and analysts</b>	<ul style="list-style-type: none"> <li>• Informing capital markets and investors about Neste's strategy, financials, outlook and demand drivers related to energy transition</li> <li>• Sharing progress and gathering expectations on sustainability matters</li> </ul>	<ul style="list-style-type: none"> <li>• Financial communications via reports, releases, calls, meetings, and Capital Markets Day</li> <li>• Transparent, regular reporting and disclosures</li> <li>• Cooperation with rating agencies and investor assessments</li> </ul>	<ul style="list-style-type: none"> <li>• Developing reporting and disclosure practices</li> <li>• Neste Green Finance Framework</li> <li>• Responding to questionnaires by rating companies and investors</li> </ul>
<b>Media</b>	<ul style="list-style-type: none"> <li>• Sharing company news, interim and annual results</li> <li>• Sharing information about company strategy and major projects</li> <li>• Sharing information on customer cooperation, sustainability, innovation, renewable and circular solutions</li> </ul>	<ul style="list-style-type: none"> <li>• Press releases and other materials</li> <li>• Following and responding to media inquiries</li> <li>• Engaging with media</li> <li>• Organizing interviews, media visits and events, background briefings</li> </ul>	<ul style="list-style-type: none"> <li>• Developing Media service, e.g., by making the media desk service more accessible by extending the service time and offering more detailed information when feasible</li> <li>• Serving the media through their preferred channels</li> </ul>
<b>Universities and research organizations</b>	<ul style="list-style-type: none"> <li>• Development and collaboration in key R&amp;D and innovation topics, incl. raw material and technology development</li> </ul>	<ul style="list-style-type: none"> <li>• Cooperation with Aalto University, Savonia University of Applied Sciences and VTT in Finland, as well as international partners</li> </ul>	<ul style="list-style-type: none"> <li>• Supporting R&amp;D&amp;I project portfolio related to the development of existing and new renewable and circular solutions</li> <li>• Promoting Neste as an employer of choice by traineeships, master's thesis projects, part-time employment etc.</li> </ul>
<b>Policymakers &amp; governmental organizations</b>	<ul style="list-style-type: none"> <li>• Driving ambitious and technology neutral policies on climate and GHG emission reduction targets</li> <li>• Advocating for renewable fuels in transportation and other industries</li> <li>• Advancing market development for renewable and recycled materials, circular economy</li> </ul>	<ul style="list-style-type: none"> <li>• Sharing views on policies, laws and regulations with policymakers</li> <li>• Supporting policymakers with industry insights and information on technological capabilities</li> <li>• Responding to public consultations and meeting with officials</li> </ul>	<ul style="list-style-type: none"> <li>• Monitoring regulatory and legislative development that can affect e.g., the demand outlook of renewable and circular solutions to influence strategy planning</li> <li>• Developing processes and operations to ensure compliance with relevant laws and regulations</li> </ul>
<b>Industry associations and cooperation bodies</b>	<ul style="list-style-type: none"> <li>• Collaboration in key topics, including industry regulatory environment, safety, climate change, renewable and circular solutions, transport sector GHG emission reductions</li> <li>• Advocating for ambitious and technology neutral policies on climate and GHG emission reduction targets, and market development for renewable and recycled materials</li> <li>• Advocating for supply chain sustainability</li> </ul>	<ul style="list-style-type: none"> <li>• Memberships in relevant industry associations, such as FuelsEurope, European Biodiesel Board, Advanced Biofuels Association (US), The Chemical Industry Federation of Finland, Cefic</li> <li>• Cooperating with e.g. International Sustainability &amp; Carbon Certification (ISCC), UN Global Compact, World Business Council for Sustainable Development (WBCSD), Nordic Network for Human Rights, Concawe</li> <li>• Participating in events, seminars and working groups</li> </ul>	<ul style="list-style-type: none"> <li>• Shaping approach and expectations to advocacy for industry specific issues</li> <li>• Leveraging coalitions of like-minded organizations to exhibit a united front on impactful policy</li> </ul>

### Policies to manage material sustainability matters

A summary of the relevant policies and principles at Neste to address material sustainability matters is summarized in the adjacent table. Neste's policies define the organization's overall purpose, goals, mission and vision; while principles describe the minimum requirements that are common to all Neste locations and operations. Details of each policy are further described under relevant sustainability matter standards. For all mentioned policies throughout the report, the most senior level in Neste's organization that is accountable for implementing the policies is the CEO. The accountability for implementing principles lies with the respective leadership team members.

Type	Name	E1	E2	E4	E5	S1	S2	G1
<b>Code of Conduct</b>	Code of Conduct	•		•			•	•
	Supplier Code of Conduct	•		•	•		•	•
<b>Policies</b>	People Policy					•		
	Sustainability Policy	•		•	•			
	Operations Excellence Policy	•	•			•		
<b>Principles</b>	Sustainability Principle	•		•	•			
	Human Rights Principle					•	•	
	Environmental Management Principle	•	•					
	Product & Chemical Safety Principle		•					
	Anti-corruption Principle							•
	Safety Leadership Principle					•		
	Responsible Sourcing Principle			•	•		•	•
	Supplier Sustainability Approval Principle			•	•			•

# Environmental information

## EU taxonomy

The EU taxonomy is a classification system for environmentally sustainable economic activities. Neste is required to disclose information about how and to what extent business activities are associated with environmentally sustainable economic activities as defined in the Taxonomy Regulation. The EU taxonomy is reported in financial terms as the proportion of economic activities that is determined to be non-eligible, eligible and aligned in turnover, Capital Expenditure (CapEx) and Operating Expenses (OpEx). The framework defines economic activities contributing to six environmental objectives. Neste has operations that contribute to the climate change mitigation objective.

### Assessment of compliance with the Taxonomy Regulation

Taxonomy eligibility for an activity is determined by the activity description in the Annexes of the climate and environmental delegated acts in the Taxonomy Regulation. Neste has screened its business areas and innovation initiatives to identify activities within the scope of the taxonomy. Eligible activities are identified based on the description of the activity in Annex I of the Climate Delegated Act of the Taxonomy Regulation. Taxonomy alignment for an activity is evaluated by the technical screening criteria for substantial contribution and “do no significant harm” (DNSH), as set out in the relevant Annexes. An activity is taxonomy-aligned when it substantially contributes to at least one environmental objective while doing no significant harm to the other environmental objectives set by the technical screening criteria. Neste has evaluated the substantial contribution and DNSH criteria for each activity identified to recognize the share of taxonomy-aligned economic activities. Additionally, an entity needs to comply with the minimum safeguards.

Based on this process, the following activities in the taxonomy have been identified as relevant for Neste:

#### 4.13 Manufacture of biogas and biofuels for use in transport and of bioliquids

- Manufacture of renewable fuels
- Renewable co-processing of fuels

#### 6.15 Infrastructure enabling low-carbon road transport and public transport

- Electric vehicle charging services

### Taxonomy criteria assessment

#### Substantial contribution criteria

The EU taxonomy refers to the manufacture of biofuels for use in transport as a sustainable activity, and Neste has assessed its manufacturing of renewable fuels for the road transport and aviation sectors, as well as the co-processing of renewable raw materials to be taxonomy-relevant economic activities based on the Climate Delegated Act of the Regulation. Neste’s Renewable Products provides renewable fuels for transportation, aviation and other sectors. By co-processing renewable raw materials the company can increase the production volumes of its renewable products.

The EU taxonomy technical screening criteria for the Climate Delegated Act including climate change mitigation establishes criteria for the “Manufacture of biogas or biofuels for use in transport and of bioliquids” activity. The recognized activities, manufacturing renewable fuels and co-processing renewable raw materials, make a substantial contribution to climate change mitigation. The substantial contribution criteria sets the threshold for greenhouse gas (GHG) emission savings from the manufacture of biofuels and biogas for use in transport

to at least 65% in relation to the GHG emission saving methodology and the relative fossil fuel comparator in accordance with Directive (EU) 2018/2001. Additionally, the criteria require that no food and feed crops are used in the manufacturing. The share of manufacturing from raw materials fulfilling the aforementioned criteria is therefore included in the alignment figures for this activity. The alignment figures for biofuel sales outside the EU are reported separately as even though they meet GHG emission saving thresholds for the EU taxonomy, the market-based GHG emission calculation differs. Neste’s renewable products comply with market-specific sustainability criteria.

The activity “Infrastructure enabling low-carbon road transport and public transport” includes Neste’s electric vehicle charging service, which is eligible for the taxonomy. The electric charging stations serve both companies and consumers.

Neste’s innovation and R&D focuses on increasing the availability of lower-quality waste and residue raw materials, while developing technologies to diversify Neste’s portfolio with new types of raw materials. As the majority of innovation and R&D activities relevant for the taxonomy support Neste’s other taxonomy-eligible and taxonomy-aligned activities, Neste no longer reports the activity “Close to market research, development and innovation” separately. Relevant innovation and R&D activities, such as the development of Neste’s existing renewable products, are accounted for in the taxonomy figures of the activity which they support.

#### Do no significant harm -criteria

The relevant activity-specific DNSH criteria from Annex I have been evaluated for each taxonomy-aligned economic activity. Neste has established and implemented procedures to ensure that Neste operations comply with

relevant legal requirements and environmental objectives. Where necessary, Neste expects this approach to minimize adverse impacts of the company’s operations on the environment. Neste’s approach to environmental management, including biodiversity, pollution and water, is further described in the Sustainability statement. The identification of climate risks, including physical climate risks, is included in Neste’s annual risk management cycle. The identified climate risks are included in the Enterprise Risk Management (ERM) process, and risk mitigation plans are implemented where appropriate. Neste’s material climate-related risks are further described in the Sustainability statement.

#### Minimum safeguards

Compliance with the minimum safeguards has been assessed at the group level based on the Report on Minimum Safeguards published by the EU Platform on Sustainable Finance in October 2022. Neste has assessed its operations to be compliant with the minimum safeguards as determined in Neste’s Code of Conduct. The Code of Conduct includes topics related to human rights, including workers’ rights, bribery and corruption, taxation and fair competition. No violations have been identified with the safeguards. Neste’s approach to human rights is described in more detail in the [S1 Own workforce](#), [S2 Workers in the value chain](#) and [G1 Business conduct](#) sections of the Sustainability statement. More information about Neste’s compliance program, including anti-corruption and competition law compliance, is disclosed in the [G1 Business conduct](#) section. Neste also publishes its tax footprint annually.

## Accounting policy

The definitions of taxonomy key performance indicators (KPIs) are based on the Disclosures Delegated Act, which supplements the Taxonomy Regulation and follows requirements that apply to the disclosures under Article 8(2) of Regulation (EU) 2020/852. Neste applies the version of the Disclosures Delegated Act that preceded the amendments of the Omnibus Delegated Act and was in effect until the end of 2025. The taxonomy reporting scope is aligned with the Consolidated Financial statements and covers Neste's global operations. The calculations follow general materiality principles. Taxonomy KPIs are calculated using the financial information presented in Notes to Neste's 2025 Consolidated Financial statements. To avoid double counting in the reported figures, allocations were made for each activity separately based on reporting structures, and a reconciliation has been carried out for the final figures. Neste does not present a table for the extent of eligibility and alignment per environmental objective, as 100% of the KPIs are related to the climate change mitigation objective.

## Turnover

In calculating the proportion of turnover from products associated with taxonomy-eligible and -aligned economic activities, Neste includes revenue from goods and services which have a clear relationship with the identified economic activities. Turnover for the manufacture of biofuels and co-processing includes sales of bio-based fuels, biofuel credits related to the physical product and exchange rate hedges. Turnover for infrastructure enabling low-carbon road transport activity includes sales from electric charging services. The denominator is Neste's total sales and refers to Note 5 Revenue in the consolidated financial statements.

## Capital Expenditure

Capital Expenditure (CapEx) includes investments related to activities identified as taxonomy-eligible or -aligned. The CapEx figures consist mainly of investments enabling Neste's renewable production capacity growth. To provide an accurate allocation of CapEx for taxonomy-aligned activities, Neste has used the share of taxonomy-aligned production volumes to allocate the proportion to the CapEx alignment figures. For example, allocations for the manufacture of biofuels activity

are made based on production volumes which fulfil the GHG emission savings and raw material criteria outlined in the technical screening criteria for the activity.

The breakdown of the CapEx figures is based on the Disclosures Delegated Act and includes taxonomy-eligible and -aligned CapEx. These taxonomy CapEx figures refer to additions in Note 13 Intangible assets (IAS38) and Note 14 Property, plant and equipment (IAS16). Right-of-use assets refer to Note 29 Leases (IFRS16) in the consolidated financial statements. However, the taxonomy figures only include the proportion of the investments within the scope of the EU taxonomy and therefore cannot be directly derived from the Notes. CapEx also covers additions to tangible and intangible assets resulting from business combinations.

Based on the Disclosures Delegated Act, companies can report aligned CapEx, when it is a part of a plan to expand taxonomy-aligned economic activities or to allow taxonomy-eligible economic activities to become taxonomy-aligned, as part of a so-called CapEx plan. Neste's taxonomy figures include investments made to expand the production capacity of existing taxonomy-aligned economic activities, which contribute to the climate change mitigation objective. Allocations to

taxonomy-aligned CapEx for these activities are made based on the production volumes. The taxonomy requires figures to be restated if the current allocation to taxonomy-aligned CapEx is not fulfilled in the scope of the CapEx plan. The status of the CapEx plan will be followed up annually.

## Operating Expenses

Taxonomy-eligible and -aligned Operating Expenses (OpEx) cover direct non-capitalized expenses related to research and development, short-term leases (IFRS 16) and maintenance and repair. OpEx figures also include costs related to personnel, identified as other direct expenses related to the day-to-day servicing required to maintain tangible fixed assets. The allocation of OpEx to activities that are partially taxonomy-aligned follows the same methodology as Neste uses in the taxonomy CapEx calculation, and the expenses are therefore allocated using the share of taxonomy-aligned production volumes.

Neste's taxonomy OpEx figures include expenses presented in Note 9 Other expenses but since the figures only include the proportion of expenses within the scope of the EU taxonomy, they cannot be derived directly from the note.

<b>Breakdown of the CapEx KPI, MEUR</b>	<b>Taxonomy-aligned activities (A.1)</b>	<b>Taxonomy-eligible but not taxonomy-aligned activities (A.2)</b>
Additions to property, plant and equipment	629	109
Additions to intangible assets	0	0
Additions to capitalized right-of-use assets	157	27
Additions related to acquisitions	0	0
<b>Total CAPEX (A.1 + A.2)</b>	<b>786</b>	<b>136</b>

<b>Breakdown of the OpEx KPI, MEUR</b>	<b>Taxonomy-aligned activities (A.1)</b>	<b>Taxonomy-eligible but not taxonomy-aligned activities (A.2)</b>
Costs of R&D	37	3
Costs of short-term leases	5	1
Costs of maintenance and repair	97	17
<b>Total OPEX (A.1 + A.2)</b>	<b>139</b>	<b>21</b>

# Turnover

Financial Year

Economic activities	Codes	2025		Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')						Minimum safeguards	2024	Category enabling activity (E)	Category transitional activity (T)
		Turnover (MEUR)	Proportion of Turnover (%)	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity				
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities</b> (Taxonomy-aligned)																			
Manufacture of biogas and biofuels for use in transport and of bioliquids	CCM 4.13	4,627	24	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	13	-	-
Manufacture of biogas and biofuels for use in transport and of bioliquids <sup>1)</sup>	CCM 4.13	1,811	10	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	13	-	-
<b>Turnover of environmentally sustainable activities</b> (Taxonomy-aligned) (A.1)		6,438	34	100%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	26		
Of which Enabling		0	0	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0	-	
Of which Transitional		0	0	0%						Y	Y	Y	Y	Y	Y	Y	0		-
<b>A.2. Taxonomy-Eligible but not environmentally sustainable activities</b> (not Taxonomy-aligned activities)																			
Manufacture of biogas and biofuels for use in transport and of bioliquids	CCM 4.13	530	3	EL	N/EL	N/EL	N/EL	N/EL	N/EL								3		
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	3	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	18	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
<b>Turnover of Taxonomy-eligible but not environmentally sustainable activities</b> (not Taxonomy-aligned activities) (A.2)		552	3	100%	0%	0%	0%	0%	0%								3		
A. Turnover of Taxonomy eligible activities (A.1 + A.2)		6,990	37	100%	0%	0%	0%	0%	0%								29		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>Turnover of Taxonomy-non-eligible activities</b>		12,026	63																
Total (A+B)		19,016	100																

Y Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective  
 EL Taxonomy-eligible activity for the relevant objective  
 N/EL Taxonomy-non-eligible activity for the relevant objective

<sup>1)</sup> Share of sales to outside of the EU.

# Capital Expenditure

Financial Year

	Codes	2025		Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')						Minimum safeguards	2024		
		CapEx (MEUR)	Proportion of CapEx (%)	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity		Proportion of Taxonomy aligned (A.1) or eligible (A.2) CapEx (%)	Category enabling activity (E)	Category transitional activity (T)
<b>Economic activities</b>																			
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities</b> (Taxonomy-aligned)																			
Manufacture of biogas and biofuels for use in transport and of bioliquids	CCM 4.13	542	43	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	27	-	-
Manufacture of biogas and biofuels for use in transport and of bioliquids <sup>1)</sup>	CCM 4.13	244	19	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	32	-	-
<b>CapEx of environmentally sustainable activities</b> (Taxonomy-aligned) (A.1)		786	63	100%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	59		
Of which Enabling		0	0	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0	-	
Of which Transitional		0	0	0%						Y	Y	Y	Y	Y	Y	Y	0		-
<b>A.2. Taxonomy-Eligible but not environmentally sustainable activities</b> (not Taxonomy-aligned activities)																			
Manufacture of biogas and biofuels for use in transport and of bioliquids	CCM 4.13	135	11	EL	N/EL	N/EL	N/EL	N/EL	N/EL								11		
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	1	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1		
<b>CapEx of Taxonomy-eligible but not environmentally sustainable activities</b> (not Taxonomy-aligned activities) (A.2)		136	11	100%	0%	0%	0%	0%	0%								12		
A. CapEx of Taxonomy eligible activities (A.1 + A.2)		922	74	100%	0%	0%	0%	0%	0%								71		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>CapEx of Taxonomy-non-eligible activities</b>		331	26																
Total (A+B)		1,253	100																

Y Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective  
 EL Taxonomy-eligible activity for the relevant objective  
 N/EL Taxonomy-non-eligible activity for the relevant objective

<sup>1)</sup> Share of sales to outside of the EU.

# Operating Expenses

Financial Year

	Codes	2025		Substantial contribution criteria						DNSH criteria ('Does Not Significantly Harm')						2024			
		OpEx (MEUR)	Proportion of OpEx (%)	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Minimum safeguards	Proportion of Taxonomy aligned (A.1) or eligible (A.2) OpEx (%)	Category (enabling activity)	Category (transitional activity)
<b>Economic activities</b>																			
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities</b> (Taxonomy-aligned)																			
Manufacture of biogas and biofuels for use in transport and of bioliquids	CCM 4.13	102	34	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	26	-	-
Manufacture of biogas and biofuels for use in transport and of bioliquids <sup>1)</sup>	CCM 4.13	37	12	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	21	-	-
Close to market research, development and innovation	CCM 9.1	-	-														2	E	-
<b>OpEx of environmentally sustainable activities</b> (Taxonomy-aligned) (A.1)		139	46	100%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	49		
Of which Enabling		0	0	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	4	-	
Of which Transitional		0	0	0%						Y	Y	Y	Y	Y	Y	Y	0		-
<b>A.2. Taxonomy-Eligible but not environmentally sustainable activities</b> (not Taxonomy-aligned activities)																			
Manufacture of biogas and biofuels for use in transport and of bioliquids	CCM 4.13	21	7	EL	N/EL	N/EL	N/EL	N/EL	N/EL								8		
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0	0	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
<b>OpEx of Taxonomy-eligible but not environmentally sustainable activities</b> (not Taxonomy-aligned activities) (A.2)		21	7	100%	0%	0%	0%	0%	0%								8		
A. OpEx of Taxonomy eligible activities (A.1+A.2)		159	53	100%	0%	0%	0%	0%	0%								56		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>OpEx of Taxonomy-non-eligible activities</b>		144	47																
Total (A+B)		303	100																

Y Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective  
 EL Taxonomy-eligible activity for the relevant objective  
 N/EL Taxonomy-non-eligible activity for the relevant objective

<sup>1)</sup> Share of sales to outside of the EU.

## Fossil gas related activities

Template 1 Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
<b>Fossil gas related activities</b>		
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities

Row	Economic activities	Proportion of turnover					
		(CCM+CCA)		Climate change mitigation		Climate change adaptation	
		Amount	%	Amount	%	Amount	%
5	4.30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	18	13	18	13	-	-
7	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of turnover	118	87	118	87	-	-
8	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of turnover	136	100	136	100	-	-

Neste reports its fossil gas related activities in accordance with the Complementary Climate Delegated Act (2022/1214). Neste has exposures to natural gas related activities through its 40% ownership of Kilpilahti Power Plant Ltd, which is a joint venture company operating a combined heat and power plant. Taxonomy-eligible turnover for the activity 4.30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuel includes

Neste's sales of natural gas to Kilpilahti Power Plant and other fossil gas related turnover relates to Neste's natural gas sales to other parties.

Taxonomy-eligible OpEx related to natural gas should cover direct expenses in accordance with the definitions in the Disclosures Delegated Act. As there have been no significant operating expenses during the reporting period and the information is financially immaterial,

Neste does not disclose the template for natural gas related OpEx.

Additionally, CapEx related to natural gas is not disclosed because the investments related to the Kilpilahti Power Plant are not included in Neste's total capital expenditure. Neste did not recognize any nuclear related activities as defined in the Complementary Climate Delegated Act.

## E1 Climate change

### Material impacts, risks and opportunities

Neste has identified the following material impacts, risks and opportunities with regards to climate change:

<b>Climate change mitigation</b>		
<b>Carbon handprint</b> (entity-specific topic)		
<b>Positive impacts</b>	Across the value chain	Neste's renewable and circular solutions enable GHG emissions reductions by Neste's customers, reducing dependency on fossil resources. Gradual development of the raw material and product portfolio composition by e.g., increasing share of renewable raw materials as opposed to fossil-based leads to a less carbon-intensive raw material pool and end products. These impacts apply across the short- to long-term.
<b>Negative impacts</b>	Across the value chain	GHG emissions across Neste's value chain contribute to global warming and climate change. GHG emissions occur upstream in fossil raw material sourcing, in own operations, and downstream from the use and further processing of Neste's products. The related global impacts of climate change apply across the short- to long-term.
<b>Opportunities</b>	Across the value chain	<p>New regulations, policy support or more ambitious climate targets can result in demand growth in renewable and circular solutions in the long-term.</p> <p>Expanding operations into new raw materials, products and technologies can create business opportunities or drive higher product value in the medium- and long-term.</p> <p>Gradual transformation of Neste's business model and operations can strengthen resilience to decreased fossil demand, allow leveraging existing assets for renewable and circular production and potentially have a positive impact on capital access and cost in the long-term.</p>
<b>Risks</b>	Across the value chain	<p>Uncertainty related to regulatory support, protectionist policies or voluntary demand for renewable and circular solutions can lead to e.g. lower sales volumes. The risk applies across the short- to long-term.</p> <p>Regulatory uncertainty related to raw materials acceptance can cause limitations to the raw materials pool, leading to competitive disadvantage for Neste or to loss of existing or potential markets. The risk applies across the short- to long-term.</p> <p>Not meeting climate commitments due to e.g., market drivers, financial constraints, technology or operational issues can result in reputational damage or increased operational costs, e.g. related to EU ETS or impact the cost and access to capital. The risk applies in the medium- to long-term.</p>
<b>Climate change adaptation</b>		
<b>Opportunities</b>	Upstream	Strengthening Neste's current raw materials portfolio through e.g., global sourcing capabilities, partnerships, pre-treatment capabilities or M&A can lead to improved competitiveness and adaptability towards climate change in the medium- to long-term.
<b>Energy</b>		
<b>Negative impacts</b>	Own operations	Neste's operations in an energy-intensive sector, especially the energy-intensity of its refining processes, lead to environmental impacts associated with energy consumption, such as GHG emissions and exploitation of natural resources. These impacts apply across the short- to long-term.

### Processes to identify climate-related impacts, risks and opportunities

Neste uses scenario analysis and enterprise risk management to identify and assess climate-related risks and opportunities, and evaluate the resilience and adaptability of Neste's business model. The risks and opportunities are incorporated into Neste's double materiality assessment, further described under [ESRS 2 General disclosures](#). Neste does not conduct a separate climate resilience analysis.

The scenario analysis, conducted in 2024 and based on prioritized inputs from a separate Task Force on Climate-related Financial Disclosures (TCFD) assessment, focused on transition risks, such as the anticipated financial effects related to e.g., climate policy developments. In the TCFD assessment, some acute and chronic physical risks to assets and raw materials were identified in higher global warming outcomes and longer timeframes, however none were deemed material. The identified climate risks are included in Neste's Enterprise Risk Management (ERM) process. Risk mitigation plans are implemented where appropriate, as described in [ESRS 2 General disclosures](#).

Climate scenarios describing different global warming outcomes were one of the key input factors. Neste based the scenario analysis and the underlying TCFD assessment on the internationally acknowledged climate pathways that represent benchmarks for the energy industry, for example the IEA Stated Policies Scenario and Announced Pledges Scenario, as well as the Net Zero 2050 scenario. These pathways cover concentration pathways similar to RCP 6.0, RCP 4.5 and RCP 2.6. Neste complemented the climate scenarios through internal analysis and identification of trends and factors relevant to its business. The complementary assumptions and weightings varied between the scenarios. The

implications to Neste were analyzed in three climate scenarios:

- Net Zero World 2050, which is in line with the 1.5°C pathways
- Net Zero EU and North America by 2050, consistent with a 2°C trajectory
- Compromised Climate Targets, reflecting global warming of 2.5°C or more by the end of the century.

Each scenario takes into consideration the development of global climate ambitions, projections of economic growth, globalization and geopolitics and development of key technologies. These drivers are relevant due to their effects on the demand of Neste's products, supply and deployment of key and new raw materials, availability of capital and Neste's overall position in supporting the global energy transition and global climate goals.

Neste's strategic planning focuses on the next 5 years, with the scenario analysis extending to 2050 to account for the increasing impact of climate change. The time horizons used in the scenario assessment were defined as short-term (1–2 years), medium-term (3–5 years) and long-term (over 6 years) to align with and cover strategic planning, capital allocation as well as expected lifetime of assets. The underlying climate scenario analysis focuses also on the "beyond 10 years" horizon.

Uncertainties related to the scenario analysis include the pace and scope of regulatory changes, technological advancements, market dynamics, the varying impacts of climate change across geographies and industries, as well as the use of national or regional data. These factors affected the considered projections for energy demand, the adoption of low-climate-impact technologies and the global transition to renewable solutions. The impact potential of these drivers on Neste were evaluated in short-, medium- and long-term time horizons with varying degrees of certainty.

Neste believes that the applied scenarios represent material risks, opportunities and uncertainties related to climate change. Key climate-related assumptions made in the financial statements are described in Note 2 Accounting Policies in Neste's Consolidated Financial statements, under the heading "Climate related topics". The assumptions are based on the same risks and opportunities as described in this section. Key climate-related assumptions in Neste's Financial statements are described in the Notes to the Consolidated Financial Statements in line with application requirement 15 in the E1 Climate change standard.

### Climate impacts

To assess, quantify and manage the impacts to climate, Neste follows the Greenhouse Gas Protocol guidance for screening GHG emissions sources and calculating emissions from its operations and value chain. The evaluation of GHG emissions is integrated into Neste's investment processes to increase transparency and control the climate impacts of the company's investments. In addition to earlier scope 1 & 2 assessments, Neste conducted a thorough scope 3 materiality assessment in 2024 to ensure all relevant scope 3 categories for the company have been identified. Relevant categories were selected based on their materiality and business relevance, while ensuring completeness and availability of consistent emissions data.

### GHG- or energy-intensive assets

Neste operates GHG- and energy-intensive assets in its refineries. Neste has identified its Porvoo refinery and oil refining business in Finland as assets and activities at risk due to climate policy developments and the energy transition. Following the 2021 closure and later decommissioning of its oil refinery in Naantali, Finland, the Porvoo refinery is Neste's only oil refinery. However, the Porvoo

refinery has significant potential as a provider of renewable and circular solutions, and Neste is enhancing its capabilities to leverage co-processing of both renewable and recycled raw materials at the refinery. Neste's long-term plan is to gradually transform the Porvoo oil refinery into a renewable and circular solutions refining hub.

### Identified risks and opportunities

Neste has identified three material transition risks related to climate change mitigation in its double materiality assessment, as described in the Material impacts, risks and opportunities table of this section. No material physical climate risks were identified in the double materiality assessment.

The energy transition will shift the energy mix from fossil fuels towards renewable fuels, and the magnitude of the transition is expected to depend on technological development and growing use of a number of novel solutions. Development of novel technologies is likely to continue. The growing global population and economic growth continue to drive increase in energy demand, yet energy efficiency improvements balance out the net impact.

## Potential implications of climate change to Neste

	Net Zero World 2050	Net Zero EU and North America by 2050	Compromised Climate Targets
<b>Description</b>	Rapid and radical emission reductions globally to meet Net Zero emissions by 2050 and limit global warming to 1.5°C, building on the IEA Net Zero 2050 Scenario.	Advanced economies demonstrate strong climate action while developing economies follow slower, consistent with a 2°C trajectory, building on the IEA Announced Pledges Scenario.	Failure to take climate action leads to the continuation of the current trends, causing global warming of 2.5°C to 3°C or more by the end of the century. Scenario is partly building on the IEA Stated Policies Scenario.
<b>Opportunities</b>	The accelerated global demand for renewable and circular solutions provides Neste opportunities to leverage global reach, expand to new markets, and optimize across raw materials, countries and customer sectors.	Continued demand growth in renewable and circular solutions; regulatory markets supported by voluntary climate ambitions.	Modest demand growth in renewable products due to less favorable regulatory framework gives room for differentiation and serving selected markets efficiently.
<b>Risks</b>	Accelerated global demand for renewable and circular solutions and supportive regulatory landscape may present transition risks related to stringent competition for key raw materials and when entering new markets.	Identified transition risks relate to regulation limiting the competitiveness of renewable fuels or narrowing the eligibility of key raw materials. A decline of fossil fuel demand could also be seen as a transition risk for Neste's current business. Risks related to accelerated alternative technology development have also been identified.	Transition risks include downscaled regulatory drivers, slowing down the demand growth for renewable products. In the long-term, physical risks related to chronic and acute climate change impacts can have significant negative effects on raw materials availability, supply chains and assets.
<b>Indicative financial impact to Neste</b>	Positive	Base case	Slightly negative

### Resilience analysis

Impacts, risks, and opportunities identified and assessed as material through business environment and business area specific analysis and evaluations, as well as covered in the double materiality assessment, inform and influence Neste's strategy development and decision-making on a broad scale, including major investments and capital allocation. Neste believes it is well-positioned to adapt its strategy and business model to a climate-resilient economy. While Neste does not conduct a separate climate resilience analysis as defined in ESRS E1, the identified climate-related impacts, risks and opportunities are indirectly considered in strategic planning. Neste's strategy aims, among other priorities, at growth in renewable fuels, and for instance raw material choices can be adjusted depending on the conditions in the business environment.

### Policies

Neste addresses material climate-related impacts, risks and opportunities in the following policies and principles: **Sustainability Policy, Sustainability Principle, Environmental Management Principle, Supplier Code of Conduct** and **Operations Excellence Policy**. In addition, the **Code of Conduct** sets out the company's commitment to reduce its GHG emissions, reach its climate targets and use energy-efficient solutions in its operations. The Code of Conduct is described more in detail in the [G1 Business conduct](#) -section of this report.

The purpose of Neste's **Sustainability Policy** is to give clear guidance to Neste's sustainability commitments and governance. The aim, through the Policy, is to ensure that aspects of sustainability are addressed in Neste's everyday business and to contribute to

sustainable development. This includes ensuring socially, environmentally and economically sustainable business conduct in all Neste's activities throughout the value chain, while creating value to the company's stakeholders. Neste's climate and other sustainability commitments reflect its ambition to support the objectives of the Paris Agreement, contributing to global efforts to limit global warming. Neste also recognizes the importance of just transition as envisaged in the Paris Agreement.

The Sustainability Policy covers IROs related to climate change mitigation and adaptation, and energy. The CEO, on behalf of the Board, has the ultimate accountability for sustainability matters and risk oversight of major significance to the Neste Group.

The purpose of the **Sustainability Principle** is to set out Neste's core sustainability commitments and define what living up to these commitments means. The Principle also describes how sustainability and its risks are

managed at Neste. It covers Neste's approach to climate change mitigation and climate change adaptation and sets out Neste's ambition in relation to renewable energy and energy efficiency.

The Sustainability Policy and Principle are applicable in all Neste operating locations and apply to all Neste employees and to anyone working for or representing any business entity within the Neste Group. They are available in English on Neste's webpage. The Sustainability Policy and Principle address several international frameworks, of which the most relevant ones for climate change are the TCFD reporting principles to disclose climate-related financial risks, and the ten principles of the UN Global Compact.

The **Supplier Code of Conduct** defines the minimum climate requirements for the company's suppliers and business partners. Neste's suppliers are expected to, at a minimum, consider the climate impact of their

operations and undertake greenhouse gas reduction measures where reasonable. More detail on the Supplier Code of Conduct and its implementation is provided in the [G1 Business conduct](#) section.

The **Operations Excellence Policy** and the **Environmental Management Principle** further describe how Neste ensures the efficient use of resources and energy in its operations. Ensuring the energy efficiency of investment projects is included in the Environmental Compliance Analysis, which is executed for all major investment projects when building new production capacity or increasing current capacity. The Operations Excellence Policy is further described in the [S1 Own workforce](#) section and the Environmental Management

Principle is further described in the [E2 Pollution](#) section.

General governance, including the highest level of accountability for policies, and stakeholder engagement related to policy implementation are described in the [ESRS 2 General disclosures](#) section of this report.

### Transition plan for climate change mitigation

Increasing the availability of renewable and circular solutions to reduce reliance on fossil resources is central to Neste's strategy. Neste's renewable products enable customers to reduce their GHG emissions. In addition to increasing production at its renewable refineries, Neste has a long-term plan to gradually transform

its oil refinery in Porvoo, Finland into a renewable and circular solutions refining hub. Neste does not have a separate climate transition plan as detailed in the ESRS but its targets, actions, resource plans and internal carbon price are intended to support the transition and climate change mitigation. Neste will evaluate developing a dedicated climate transition plan in line with emerging sustainability and due diligence regulations and evolving regulatory expectations. All Neste's strategic plans are governed by the Board of Directors, including actions and related investments needed to meet Neste's climate targets. Neste is excluded from the EU Paris-aligned Benchmarks (PABs), as the company derives revenue from the refining of fossil fuels.

### Targets

Neste has three quantifiable, time-bound targets for climate change mitigation (Table Neste's targets on climate change mitigation). In 2025, Neste revised its scope 1 & 2 target by setting a greenhouse gas emission reduction target of 80% by 2040 compared to 2019, replacing the target of reaching carbon neutral production by 2035. The interim targets supporting this long-term target are 24% reduction by 2030 and 50% reduction by 2035. With this revision Neste focuses solely on absolute GHG emission reductions and removes the option of using emission compensation from its climate target setting.

## Neste's targets on climate change mitigation

Targets	Target details	2025	2024
<b>Carbon handprint:</b> Help Neste's customers to reduce their greenhouse gas emissions by at least 20 million tons annually by 2030 with renewable and circular solutions	<b>Key performance indicator:</b> Reduced GHG emissions by Neste customers with Neste's renewable products during the reporting year (compared to fossil fuel) (MtCO <sub>2</sub> e) <b>Baseline year:</b> n.a. <b>Period:</b> Annually and until 2030 <b>Scope:</b> Own operations and upstream and downstream value chain, customer use of products	14.2 MtCO <sub>2</sub> e	12.1 MtCO <sub>2</sub> e
<b>Scope 1 &amp; 2:</b> Reduce GHG emissions in Neste's own operations by 24% by 2030, 50% by 2035, and 80% by 2040 compared to 2019 baseline	<b>Key performance indicator:</b> Absolute scope 1 & 2 GHG emissions (MtCO <sub>2</sub> e) <b>Unit:</b> % reduction in tCO <sub>2</sub> e <b>Baseline year:</b> 2019 <b>Period:</b> Until 2040 <b>Scope:</b> Own operations	3.08 MtCO <sub>2</sub> e 12% reduction compared to baseline	2.68 MtCO <sub>2</sub> e 24% reduction compared to baseline
<b>Scope 3:</b> Reduce the use-phase emission intensity of sold products by 50% by 2040 compared to 2020 levels	<b>Key performance indicator:</b> Use-phase emission intensity (gCO <sub>2</sub> e/MJ) <b>Unit:</b> % emission intensity reduction in tCO <sub>2</sub> e <b>Baseline year:</b> 2020 <b>Period:</b> Until 2040 <b>Scope:</b> Downstream supply chain (sold products)	54 gCO <sub>2</sub> e/MJ 7% reduction compared to baseline	54gCO <sub>2</sub> e/MJ 7% reduction compared to baseline

The base year and baseline for the scope 1 and 2 target stay the same. Two of Neste's climate targets remain unchanged: the carbon footprint target to reduce the use-phase emission intensity of sold products by 50% from 2020 by 2040, and the carbon handprint target to help customers reduce their greenhouse gas emissions by 20 Mt annually by 2030 with Neste's renewable and circular solutions. Neste's climate targets are linked to its overall business strategy, and considered in financial planning and resource allocation, for example, through the use of internal carbon price. The revision aligns Neste's climate targets with the current market and regulatory environment as well as the company's current financial position and streamlined investment portfolio.

For target setting, Neste has been using the guidance of the leading climate frameworks, such as the GHG Protocol, the Science Based Targets initiative (SBTi, incl. both the general guidance and the draft guidance for oil & gas sector), Transition Pathway Initiative (TPI) (GHG emission intensity pathways incl. scope 1 & 2 and scope 3 use of sold products based on IEA Net Zero 2050 scenario) and Exponential Roadmap initiative (ERI) (50 % reduction every decade). The target revision broadly involved internal stakeholders such as all business areas, strategy, finance and executive leadership, and also external stakeholder views were incorporated into the analysis and decision-making as brought forward by these internal stakeholders.

While Neste's current near-term targets are not aligned with the 1.5°C pathways, Neste believes they remain broadly consistent with the Paris Agreement's goal to limit global warming to well below 2°C. The targets ensure GHG emissions are consistently reduced in the company's operations and value chain. Neste's climate roadmap is designed to accelerate with a sharper emissions reduction curve towards 2040 in line with expected development in the demand and regulatory environment. In the near term, reductions will be made at a financially viable pace, while demonstrating progress in mitigating the company's climate impact. Neste continues to develop and strengthen its targets in line with the latest climate science, developing regulation,

available and emerging sector standards, as well as its financial capabilities.

Neste's GHG emissions reduction targets align with the GHG inventory boundaries, following the same scope and category breakdowns and using the same calculation approach as explained in the reporting principles for the climate metrics in this report. The baseline values for Neste's climate targets generally represent the company's overall activities covered as well as any external influences that would lead to major deviations from annual emissions. Key Performance Indicators (KPIs) associated with targets on scope 1 and 2 are in accordance with ESRS metrics. Carbon handprint and related KPI, as well as scope 3 use-phase emission intensity KPI are entity-specific. Scope 1 & 2 and scope 3 use-phase emission intensity targets' baselines have been compared to previous years values to ensure no major changes or external impacts have taken place. The baseline values include all activities included in the operational control reporting boundary. The scope 1 & 2 target considers market-based scope 2 emissions.

Neste does not have separate measurable, time-bound and outcome-oriented targets in place for IROs related to climate change adaptation nor upstream IROs related to climate change mitigation, but does nevertheless track the effectiveness of its policies and actions as set out below.

**Climate change adaptation:** To address the opportunity to enhance flexibility in the supply chain through renewable raw materials, Neste continues growing and diversifying its raw materials portfolio as explained further in [E5 Resource use and circular economy](#) section. These actions are relevant for Neste's upstream activities.

**Climate change mitigation:** Neste continues to work with the company's suppliers and partners to reduce GHG emissions across its value chain. The Neste Supplier Code of Conduct sets requirements towards Neste's suppliers regarding environmental impact and climate change, as further elaborated in the [G1 Business conduct](#) section. The scope of these activities are upstream and downstream scope 3 emissions, e.g.,

purchased goods, services, transportation and logistics. Progress will be reflected in relevant scope 3 GHG emissions.

#### Progress in targets

Neste's climate targets are monitored and reviewed as part of e.g., the remuneration of Neste's key personnel, as core climate targets are connected with the performance metrics in Neste's long-term incentives (LTIs), as described in [ESRS 2 General disclosures](#). Performance towards climate targets in 2025 is presented below:

- **Carbon handprint:** In 2025, Neste's renewable and circular solutions helped its customers to reduce GHG emissions by 14.2 million tons (compared to fossil fuel).
- **Scope 1 and 2 GHG emissions:** To date Neste has achieved 0.4 MtCO<sub>2</sub>e (12%) reduction in its scope 1 & 2 GHG emissions compared to the 2019 baseline of 3.52 MtCO<sub>2</sub>e.
- **Scope 3 use-phase emission intensity:** To date Neste has achieved 7% reduction to its use-phase emission intensity compared to its 2020 baseline of 58 gCO<sub>2</sub>e/MJ.

Progress towards targets is in general in line with planned. Due to the nature of the industry Neste operates in, progress towards targets is not expected to be linear year-on-year but depend on e.g., investment life cycle, R&D&I breakthroughs, market conditions reflected in sales volumes and product mix and refinery turnarounds. There have not been significant changes or trends that would have affected 2025 performance towards climate targets. However, scope 1 and 2 emissions were temporarily lower in 2024 due to a turnaround at Neste's Porvoo refinery, resulting in reduced operational activity. In 2025, GHG emissions increased as production returned to a normal operating level. As a result, the progress in emissions reductions from the 2019 base year is smaller when comparing 2025 to 2024, despite the progress in underlying long-term GHG emission reduction plans.

### Actions

Neste's key actions and identified climate change mitigation levers, including those currently implemented, planned, or under evaluation, to address material climate-related impacts, risks and opportunities, and to support progress toward its climate targets are presented in the adjacent table and graph.

### Expected outcomes

The expected outcomes of these actions include reduced scope 1 and 2 GHG emissions (reduction potential estimated to be ~2.8 MtCO<sub>2</sub>e from 2019 by 2040), improved energy efficiency, lower use-phase emission intensity of sold products and higher carbon handprint. These actions contribute to the management of material negative impacts associated with GHG emissions from Neste's own operations and value chain, energy consumption, as well as positive impacts related to reduced GHG emissions by Neste's customers. Through these actions, Neste is aligning with the objectives of the Sustainability Policy.

The implementation and timing of the actions presented are subject to individual investment decisions and depend on various factors including market demand, availability of financial resources, evolving policy and regulatory frameworks, technological readiness, and wider macroeconomic conditions enabling significant and long-term investments.

### Identified climate change mitigation levers

			Relevance for Neste's climate targets (indicative)		
			Scope 1 & 2	Scope 3 use-phase emission intensity	Carbon handprint
		Actions			
<b>Renewable and recycled raw materials and reducing reliance on fossil fuels</b>	Continuous	<ul style="list-style-type: none"> <li>Increasing production capacity for renewable products, e.g., Rotterdam refinery capacity expansion project</li> <li>Diversifying raw materials portfolio, increasing the use of low-carbon-intensity raw materials</li> <li>New processing capacity for recycled raw materials in Porvoo</li> <li>Enhancing Porvoo refinery capabilities to leverage renewable and recycled raw materials co-processing</li> <li>Gradual transition away from fossil refining</li> </ul>	•	•	•
<b>Renewable energy</b>	Continuous	<ul style="list-style-type: none"> <li>Renewable electricity, such as Power Purchase Agreements and Guarantees of Origin</li> <li>Renewable marine fuel procurement for shipping operations</li> </ul>	•		•
	Under evaluation	<ul style="list-style-type: none"> <li>Renewable steam, e.g., renewable energy boilers and potential future investments</li> <li>Replacing fossil fuels with own offgases and renewable fuels</li> </ul>	•		•
<b>Operational excellence</b>	Continuous	<ul style="list-style-type: none"> <li>Energy efficiency improvements to e.g. reduce steam consumption</li> <li>New shipping fleet</li> </ul>	•		•
	Under evaluation	<ul style="list-style-type: none"> <li>Exploring options for electrification of process heating, new technology, and asset and digital optimization</li> </ul>	•		•
	Implemented in 2025	<ul style="list-style-type: none"> <li>Energy efficiency improvements in refineries</li> <li>New shipping fleet</li> </ul>	•		•
<b>Replacing fossil hydrogen with alternative solutions</b>	Under evaluation	<ul style="list-style-type: none"> <li>Evaluating alternatives for replacing fossil hydrogen use at refineries</li> <li>Exploring opportunities to expand to new solutions and technologies</li> </ul>	•	•	•
<b>Carbon capture and storage</b>	Under evaluation	<ul style="list-style-type: none"> <li>Solutions for carbon capture and storage</li> </ul>	•		

### Resources to implement actions

Implementation of the actions required to meet Neste's climate targets are expected to require significant (>50 MEUR) operational and/or capital expenditures. In 2025, relevant financial resources related to actions on increasing the use of renewable raw materials and reducing reliance on fossil fuels are included under Neste's reporting in accordance with the EU taxonomy. For example, Neste's taxonomy reporting includes investments made to expand the production capacity of existing taxonomy-aligned economic activities as part of a so-called CapEx plan. Further information on the CapEx plan is provided in Neste's [taxonomy reporting](#).

### Internal carbon pricing

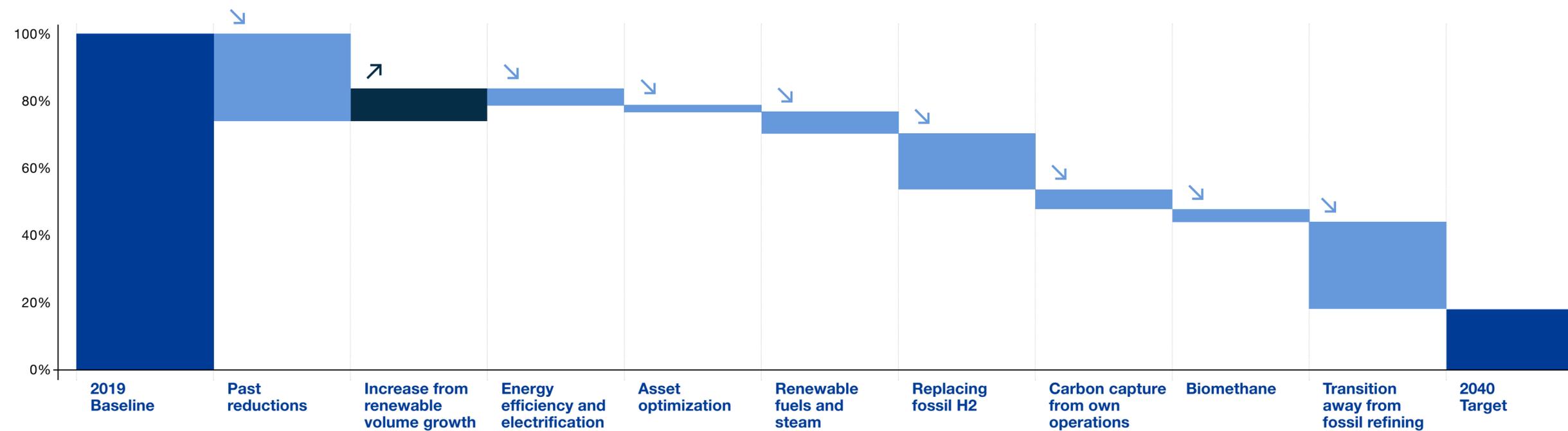
Neste applies an internal carbon price for its scope 1 and 2 GHG emissions in investment calculations, business case evaluations and in strategic planning. The internal shadow price for carbon is utilized globally, across Neste's business areas and functions.

Neste's internal carbon price is 100 EUR/tCO<sub>2</sub>e and remains unchanged compared to 2024. When setting the internal carbon price, Neste utilizes various sources, for example the EU Emission Trading System (ETS) allowance price and forecasts, and other external references such as carbon prices used in International Energy Agency (IEA) climate scenarios. While the EU ETS is

chosen as a source based on its direct financial relevance for Neste, the IEA also provides indication of sector- or industry-specific price levels required to reach the climate goals in the Paris Agreement, especially for time horizons where the visibility to detailed climate policies is unclear. Neste regularly reviews the internal carbon price as part of its strategic planning process. Neste internal carbon price does not cover scope 3 GHG emissions.

### Graphical presentation of scope 1 and 2 emission reduction levers

More detailed breakdown of identified scope 1 and 2 GHG emission reduction levers and their illustrative impact on Neste's GHG emission as a percentage of the baseline.



## Metrics

### Energy consumption and mix

Energy consumption and mix	2025	2024
Fuel consumption from coal and coal products, MWh	0	0
Fuel consumption from crude oil and petroleum products, MWh	8,401,000	7,322,000
Fuel consumption from natural gas, MWh	881,000	858,000
Fuel consumption from other fossil sources, MWh	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources, MWh	1,503,000	1,577,000
<b>Total fossil energy consumption, MWh</b>	<b>10,785,000</b>	<b>9,757,000</b>
<b>Share of fossil sources in total energy consumption, %</b>	<b>80</b>	<b>80</b>
<b>Total consumption from nuclear sources, MWh</b>	<b>708,000</b>	<b>600</b>
<b>Share of consumption from nuclear sources in total energy consumption, %</b>	<b>5</b>	<b>0</b>
Fuel consumption from renewable sources, including biomass, MWh	1,143,000	994,000
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources, MWh	926,000	1,520,000
The consumption of self-generated non-fuel renewable energy, MWh	1,000	10
<b>Total renewable energy consumption, MWh</b>	<b>2,071,000</b>	<b>2,514,000</b>
<b>Share of renewable sources in total energy consumption, %</b>	<b>15</b>	<b>20</b>
<b>Total energy consumption, MWh</b>	<b>13,564,000</b>	<b>12,272,000</b>
<b>Energy production</b>	<b>2025</b>	<b>2024</b>
Renewable energy production, MWh	6,000	1,000
Non-renewable energy production, MWh	263,000	176,000
<b>Energy intensity per net revenue</b>	<b>2025</b>	<b>2024</b>
Total energy consumption from activities in high-climate-impact sectors per net revenue from activities in high-climate-impact sectors, MWh/MEUR	713	595

### Carbon handprint

Carbon handprint	2025	2024
Reduced GHG emissions by Neste customers with Neste's renewable products during the reporting year (compared to fossil fuel), MtCO <sub>2</sub> e	14.2	12.1

## Gross scopes 1, 2, 3 and Total GHG emissions

	Base year (2019)	Retrospective	
		2025	2024
<b>Scope 1 GHG emissions</b>			
Gross scope 1 GHG emissions from the consolidated accounting group, tCO <sub>2</sub> eq		2,669,000	2,290,000
Gross scope 1 GHG emissions from investees for which Neste has operational control, tCO <sub>2</sub> eq		0	0
<b>Gross scope 1 GHG emissions, tCO<sub>2</sub>eq</b>	2,580,000	2,669,000	2,290,000
Percentage of scope 1 GHG emissions from regulated emission trading schemes, %		94	94
<b>Scope 2 GHG emissions</b>			
Gross location-based scope 2 GHG emissions from the consolidated accounting group, tCO <sub>2</sub> eq		466,000	470,000
Gross location-based scope 2 GHG emissions from investees for which Neste has operational control, tCO <sub>2</sub> eq		100	100
<b>Gross location-based scope 2 GHG emissions, tCO<sub>2</sub>eq</b>	513,000	466,000	470,000
Gross market-based scope 2 GHG emissions from the consolidated accounting group, tCO <sub>2</sub> eq		412,000	393,000
Gross market-based scope 2 GHG emissions from investees for which Neste has operational control, tCO <sub>2</sub> eq		0	0
<b>Gross market-based scope 2 GHG emissions, tCO<sub>2</sub>eq</b>	936,000	412,000	393,000
<b>Significant scope 3 GHG emissions</b>			
Total gross indirect (scope 3) GHG emissions, tCO <sub>2</sub> eq		51,590,000	56,490,000
1 Purchased goods and services, tCO <sub>2</sub> eq		5,070,000	7,390,000
3 Fuel and energy-related activities (not included in scope 1 or scope 2), tCO <sub>2</sub> eq		90,000	100,000
4 Upstream transportation and distribution, tCO <sub>2</sub> eq		670,000	820,000
5 Waste generated in operations, tCO <sub>2</sub> eq		30,000	310,000
9 Downstream transportation, tCO <sub>2</sub> eq		590,000	720,000
11 Use of sold products, tCO <sub>2</sub> eq		42,240,000	45,070,000
12 End-of-life treatment of sold products, tCO <sub>2</sub> eq		1,110,000	900,000
15 Investments, tCO <sub>2</sub> eq		1,790,000	1,180,000
<b>Total GHG emissions</b>			
<b>Total GHG emissions (location-based), tCO<sub>2</sub>eq</b>		54,724,000	59,250,000
<b>Total GHG emissions (market-based), tCO<sub>2</sub>eq</b>		54,670,000	59,173,000

GHG intensity per net revenue	2025		2024	
	2025	2024	2025	2024
Total GHG emissions (location-based) per net revenue, tCO <sub>2</sub> eq/MEUR	2,878	2,871		
Total GHG emissions (market-based) per net revenue, tCO <sub>2</sub> eq/MEUR	2,875	2,868		

## Reporting principles

Majority of the **energy consumption** and production data is collected either from Neste's own measurement devices or via energy invoices. Estimates are used for minor energy consumption sources like small rented offices and own logistics. Data coverage is estimated to be > 99 %.

Neste follows GHG Protocol Corporate Standard and its supplement Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The reporting includes emissions of the GHGs covered by the GHG Protocol (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub> and NF<sub>3</sub>). Emissions have been converted into carbon dioxide equivalents.

**Scope 1 and 2:** Neste's scope 1 accounting is based on fuel consumption and emissions calculations. To calculate scope 1 emissions, activity data (MWhs contained by consumed fuel) is multiplied with site and fuel-specific emission factors to arrive at the total GHG emissions impact. When emissions are reported under the ETS or other regulations, the emission factors from these schemes are used. Otherwise country-based published emission factors are used. Other relevant GHG emissions than CO<sub>2</sub> are calculated separately for all combustion taking place in the refinery facilities. Other sources are excluded as negligible.

To calculate scope 2 emissions, activity data (MWhs of purchased energy consumption) is multiplied by emission factors to arrive at the total GHG emissions impact of purchased energy (electricity, heat, steam) use. Market-based scope 2 emissions are based on supplier-specific emission factors when available. In other cases, residual grid mix or country-specific emission factors are used. Location-based scope 2 emissions are based on country-specific emission factors published by IEA, Motiva and other country-based public sources. Emission factors for CO<sub>2</sub>eq are used when available.

Market-based scope 2 accounting covers contractually purchased electricity both bundled with energy attribute instruments, such as Guarantees of Origin (GoOs), and through the use of unbundled GoOs purchased separately. In 2025, 90.7% (2024: 86.2%) of Neste's total electricity usage was covered by GoOs, of which 29.4% was covered with bundled instruments and 61.3% unbundled GoO's.

Biogenic scope 1 emissions were 467,000 tCO<sub>2</sub> (2024: 421,000 tCO<sub>2</sub>) and scope 2 biogenic emissions 47,000 tCO<sub>2</sub> (2024: 58,000 tCO<sub>2</sub>) in 2025. The scope 1 figure includes process emissions that are partially based on estimation.

**GHG intensity and energy intensity** is calculated based on the revenue as presented in Note 5 Revenue in the consolidated financial statements. All Neste operations in operational control are included in the energy intensity figure. Relevant high climate impact sectors (based on ESRS definition) include activities related to Neste's refining operations, sale and trading of fuels and raw materials, retail sale of fuels and related products, shipping operations and other supporting activities, such as terminal operations.

**Scope 3:** For the scope 3 GHG emissions, each reported category can have different methodologies as detailed in the Technical Guidance for Calculating Scope 3 Emissions from GHG Protocol. Neste has used the following methodologies per categories: Average data method (categories 1 & 3); Spend-based method (category 1); Supplier-specific method (category 1); Distance-based method (categories 4 & 9); Waste-type-specific method (categories 5 & 12); Methodology for direct use-phase emissions according to Standard ISO 14083 (category 11); Investment-specific method (category 15); Life Cycle Assessment biofuel regulation methodology from Renewable Energy Directive (EU) 2018/2001 or from CARB Regulation (categories 1, 4, 9 & 11).

Methodologies have been chosen based on the availability and accuracy of the data and, when possible, on involvement of a third-party certification process.

When actual GHG emission factors are not available, industry- or location-specific GHG emission factors from industry databases or scientific reports are used. Sources include European Commission JRC studies, UK Department for Energy Security & Net Zero, EN ISO 14083 standard, Renewable Energy Directive (EU) 2018/2001 and Commission Implementing Regulation (EU) 2022/996, IPCC, California Air Resources Board, Tilastokeskus (Statistics Finland), Ecoinvent, ICCT and S&P Global.

With upstream (category 4) and downstream (category 9) transportation, Neste's categorization of transportation emissions into upstream and downstream (product flow approach) differs slightly from the financial flow approach stated in the GHGP Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

All Neste's scope 3 GHG emissions are calculated using inputs from Neste-specific activities using data from enterprise resource planning systems for supply, sales or procurement and from operating systems for production and site data. Neste's renewables business also provides input through product and feedstock bio-criteria management and traceability systems. 74.7% (2024: 61.3%; recalculated) of emissions are calculated using primary data obtained from suppliers or other value chain partners. Calculation principles for primary data were updated in 2025 to include the emissions from the use-phase of Neste's produced fuel (category 11), and 2024 value has been recalculated respectively.

For a part of transportation emission (categories 4 & 9) and purchased goods and services (category 1), in the case where reliable data is not available, sector average data is used. For some subsidiaries, joint ventures or other entities outside Neste's operational control, estimation

based on quantitative data, such as production capacity, has been done. The estimations are compared to the known part of activity data and/or use industry average data, to ensure a sufficient level of accuracy. As part of the company's actions related to climate change mitigation, Neste continues to work with suppliers and partners to improve access to reliable value chain data.

For scope 3 category 5 (Waste generated in operations), in 2025, Neste has used the suggested approach in the Technical Guidance for Calculating Scope 3 Emissions from GHG Protocol to only include transportation emissions for waste with recovery, recycling or re-use as the GHG emissions from waste treatment should be allocated to the next life cycle. Additionally, in 2025 Neste was able to use primary data for the waste treatment and transportation emission factors. These changes partly explain the deviation between 2024 and 2025 reported values for category 5 emissions, as 2024 value has not been recalculated.

Significant scope 3 categories for Neste include categories 1, 3, 4, 5, 9, 11, 12 and 15. Excluded categories include:

- Capital goods (category 2): Compared to Neste's supplier spend, capital goods spend is not relevant. Currently capital goods and other purchased materials are included in category 1 through spend data.
- Business travel (category 6): based on qualitative assessment, the significance of the emissions related to business travel are assessed to be minimal (<0,5 %) compared to other scope 3 categories.
- Employee commuting (category 7): based on qualitative assessment, the significance of the emissions related to employee commuting are assessed to be minimal (<0,5 %) compared to other scope 3 categories.
- Upstream leased assets (category 8): based on qualitative assessment, Neste does not operate upstream leased assets; therefore, the category is not relevant.

- Processing of sold products (category 10): based on qualitative assessment, GHG emissions from the processing of Neste's sold products are accounted for in category 1 or 11.
- Downstream leased assets (category 13): based on qualitative assessment, the significance of the emissions related to downstream leased assets is assessed to be minimal (<0,5 %) compared to other scope 3 categories.
- Franchises (category 14): Neste does not engage in franchising activity.

In the upstream and downstream value chain of Neste, 13.3 Mt of biogenic CO<sub>2</sub> (2024: 12.3 MtCO<sub>2</sub>) is emitted from the combustion or biodegradation of biomass.

**Use-phase emission** intensity is calculated by dividing the GHG emissions from the use of products produced by Neste and sold by Neste (part of scope 3) with the total amount of sold energy (gCO<sub>2</sub>e/MJ).

Energy and climate metrics described above have not been validated separately by an external third party. Some underlying data sources are covered by certification and emission trading schemes and related validation processes.

**Carbon handprint** describes the difference of carbon footprint of a product or service and a baseline product or service. The bigger the handprint, the better. In this report, it is expressed in millions of tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e). In addition to data included in line with the [ESRS 2 General disclosures](#) General basis for preparation of the Sustainability statement, the metric includes Neste-sold volumes from the joint operation Martinez Renewables.

Neste's customer GHG emissions reduction is calculated by aggregating the customer's GHG emission reduction for each batch of renewable products delivered to Neste's customers. For each batch of product, Neste collects the quantity of energy and the emission factor for the product in gCO<sub>2</sub>e/MJ. Biofuel and biochemical industry traceability requirements, i.e. Renewable

Energy Directive, California CARB regulations or CORSIA, ensure that these emission factors are allocated correctly to a unique batch by a third party audited bio-criteria management system. Moreover, these emission factors on a lifecycle basis are calculated based on third-party certified actual production data, or approved default value, according to industry and market regulations listed above. Renewable products sold to the petrochemical industry are considered as combusted as fuels in this calculation methodology. The GHG emission related to each batch is compared with the GHG emission that the same quantity of a fossil fuel reference (baseline) would emit. Emission factors for the fossil references are dependent on the market where the product was sold and its regulation.

## E2 Pollution

### Material impacts, risks, and opportunities

Neste has identified the following material impact with regards to pollution:

#### Substances of concern

<b>Negative impact</b>	Across the value chain	Substances of concern are hazardous and may have a negative impact on human health and/or the environment if effective risk management measures are not in place or fail. Many Neste products are substances of concern (SoC) and SoCs are used in manufacturing them. The impact applies across short- to long-term time horizons.
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### Processes to identify pollution-related impacts, risks and opportunities

Neste assesses the health and environmental impacts of all its products. This is a regulatory requirement for chemicals. Results of these assessments are documented in e.g., the chemical safety data sheet that is supplied to customers and own employees using or manufacturing these chemicals. The health and safety impacts of raw materials used in manufacturing of Neste products are also assessed.

Many crude oil based Neste products as well as some chemicals used in the manufacturing processes in Neste refineries are or contain substances of concern as defined in the CSRD. The definition of substances of concern is purely based on the hazard properties of a substance, not on the likelihood of the exposure or risk considerations. All countries of Neste's operations have regulatory requirements relating to protecting human health and the environment. In addition to following and implementing such regulations, Neste also has its own safety management system, internal instructions and processes in place to manage the risk from hazardous chemicals and follow performance. Part of Neste's revenue is based on manufacturing and selling products that contain substances of concern – chemicals like transportation and marine fuels. Substances of concern are thus considered material for Neste, while the safety management systems are in place to protect people and the environment from actual impacts.

All Neste's operations must comply with relevant legal requirements and environmental objectives. The legal requirements have been set by regulators for the purposes of protecting human health and the environment. In the EU, for example, an environmental permit is required for operations that cause a risk of environmental pollution. The requirements and limit values set by the authorities for operations are based on air and water quality standards, assessment of environmental impacts and latest scientific research. By following the legal requirements, permit conditions and limit values, no significant harm is caused to the environment or human health. Therefore, emissions that do not exceed permit conditions and limits are not considered material in Neste's double materiality assessment. Neste reports emissions (emission components) classified as substances of concern for its refineries. The selected reporting scope complies with the general requirement of the E2 Pollution standard for consolidated emissions from facilities for which the applicable E-PRTR (current IEPR) threshold is exceeded.

#### Policies

The foundations of safety excellence and continual improvement are defined by Neste's **Operations Excellence Policy** and **Operations Excellence Management System (OEMS)**, which includes the Operations Excellence Policy, Principles and supplementary detailed Standards. The Operations Excellence Policy

sets out Neste's approach to preventing incidents and ensuring effective safeguards for people and the environment. Under the Policy, substances of concern are addressed through ensuring that product compliance and chemical safety hazards are effectively managed. More information on the Operations Excellence Policy is provided under [S1 Own workforce](#).

Through the implementation of the OEMS, Neste aims to ensure that product compliance and chemical safety hazards are effectively managed in its operations. The OEMS includes the **Product & Chemical Safety Principle**, which outlines mandatory chemical legislation requirements and their handling across operations. It covers the mitigation of material impacts related to Neste's use and processing of substances of concern. Neste is dedicated to product and chemical safety, ensuring compliance with regulations, minimizing risks and fostering a sustainable approach to chemical management.

The Product & Chemical Safety Principle mandates the identification of substances of concern. Neste is actively working towards substituting chemicals with less harmful alternatives where possible and increasing the use of renewable raw materials and products. This shift towards renewable resources is key in gradually reducing the presence of substances of concern in Neste's operations.

The Principle covers all chemicals used, stored, sold, manufactured, purchased or imported by Neste,

including substances of concern. It applies to all Neste employees and anyone working on behalf of the company, including service providers and contractors. The implementation of the Principle is a collaborative effort involving Neste's Business Areas, Procurement, R&D and the Safety organization. Business Areas are responsible for compliance in sales, trade and production, as well as the safe handling and disposal of chemicals. The Safety organization plays a crucial role in identifying regulatory requirements, raising awareness, providing training, assessing hazards and supporting the minimization of occupational exposure.

The requirements of the Principle are based on legal requirements applicable to Neste's operations, including the REACH and CLP Regulations in the EU, the TSCA in the US, the Workplace Safety and Health Act in Singapore, and international agreements like the ILO Chemical Convention. The Principle is available internally in the Neste Management System and the requirements are monitored through OEMS audit procedures and continuous internal engagement with relevant stakeholders.

Neste's **Environmental Management Principle** describes key aspects and minimum requirements for environmental protection and related environmental improvements in Neste's operations, and provides an approach to ensure such requirements are performed in a uniform way. This includes e.g., identifying and mitigating emissions, as well as recognizing and mitigating potential environmental risks. For the purposes of

avoiding incidents and accidents with significant environmental impact, Neste's operations identify environmentally critical operations, systems and equipment, and prepare management plans accordingly. The Principle also concerns the management of material impacts related to substances of concern by requiring that production sites evaluate presence and current or earlier use of substances of very high concern (SVHCs) and establish a program for risk management, control or removal and proper handling.

The Environmental Management Principle is applicable to all Neste owned and operated production sites and terminals and Neste operated logistics, Marketing & Services operations and other Neste operations like Investment Project Execution and Governance. It is available internally in the Neste Management System, while a description of the key contents of the Principle is available publicly. The implementation of the Principle is done through a dedicated program during 2025–2027 and furthermore, monitored through internal audits and monthly environmental compliance reporting.

Key performance indicator	Performance in 2025	Performance in 2024
Incidents of non-compliance concerning the health and safety requirements of products	No cases of non-compliance as defined in reporting principles.	One case relating to a lacking authority notification in 2023, which Neste received an authority warning/notice for in 2024.

General governance, including the highest level of accountability for policies, and stakeholder engagement related to policy implementation are described in the [ESRS 2 General disclosures](#) section of this report.

### Targets

Neste complies with requirements for product and chemical safety, as described in the Operations Excellency Policy and Product and Chemical Safety principle, to address impacts associated with substances of concern in its supply chain and products. Neste does not have separate targets in place with regards to substances of concern but tracks the effectiveness of its policies with e.g., the entity-specific KPI presented in the adjacent table. Neste aims to minimize the number of non-compliances related to the health and safety requirements of its products. Neste has not defined a base year for the key performance indicator.

## Actions and resources

### Actions

Key actions related to substances of concern at Neste include the continued development of practices in ensuring compliance and maintaining safety standards and requirements in Neste's own operations and the supply chain in accordance with product and chemical safety legislation. Further information on current and planned actions is provided in the adjacent table. Information about how safety incidents (including those related to substances of concern) are addressed in the [S1 Own Workforce](#) section of this report.

### Expected outcomes

As a result of the actions, Neste expects its products to continue complying with product and chemical safety requirements, while also minimizing chemical compliance or safety incidents. The progress towards actions related to chemical compliance is followed through continuous monitoring of incidents of non-compliance concerning the health and safety requirements of products, including the compliance with product and chemical safety legislation and Neste's policies and principles.

As a result of its environmental compliance assurance efforts and implementation of the updated Environmental Management Principle, Neste ensures its operations comply with relevant environmental requirements. Neste

is committed to correct any potential environmental non-compliances. Furthermore, Neste aims to ensure that its operations do not cause significant harm to the environment.

### Resources to implement actions

Implementation of actions related to substances of concern are covered by e.g., process safety investments under prioritized maintenance operational or capital expenditures to ensure safety and reliability of operations. Actions related to compliance with regulatory requirements for product and chemical safety are business-as-usual activities that did not require dedicated significant (> 50 MEUR) financial resources during the reporting year, and are not expected to require such resources in the future. Future financial resources allocated to actions listed above may be subject to individual investment decisions and depend on various internal and external factors.

Action area	Description	Actions in 2025	Planned actions
<b>Chemical compliance</b>	Neste ensures chemical compliance and safety through implementing internal monitoring systems, maintaining and developing instructions, training, awareness campaigns, networking and practical tools for managing product and chemical safety compliance, and conducting systematic self-assessments and audits to ensure compliance.	In 2025, key actions included updating internal instructions, providing training to own employees and updating several REACH registration dossiers and safety data sheets as well as maintaining the daily compliance work in line with business development.	Current actions will be continued on an ongoing basis over the long term to ensure chemical compliance and internal competence and processes.
<b>Environmental management and compliance</b>	Neste follows up environmental compliance utilizing site-specific leading and lagging environmental indicators. To ensure compliance, Neste develops environmental management practices and conducts environmental self-assessments and audits.	In 2025, key actions focused on implementing the updated Environmental Management Principle. Implementation actions were determined through a detailed site-specific gap analysis.	The implementation of the Environmental Management Principle continues until 2027.

Metrics	2025		2024	
	Health hazard class	Environmental hazard class	Health hazard class	Environmental hazard class
<b>Substances of concern, kilotons</b>				
<b>Total amount of substances of concern that are generated or used during production or that are procured</b>	<b>12,309</b>	<b>0</b>	<b>10,468</b>	<b>0</b>
Amount of substances of concern that leave facilities as products	5,792	10	6,378	22
Amount of substances of concern that leave facilities as part of products	4,623	0	5,307	0
<b>Total amount of substances of concern that leave facilities as products or as part of products</b>	<b>10,415</b>	<b>10</b>	<b>11,686</b>	<b>22</b>
Amount of substances of concern that leave facilities as emissions	0.7	0	0.6	0
<b>Total amount of substances of concern that leave facilities as emissions, as products or as part of products</b>	<b>10,416</b>	<b>10</b>	<b>11,686</b>	<b>22</b>

### Reporting principles

Substances of concern are recognised and tracked in Neste's internal IT systems. There are a variety of existing regulatory requirements in place for notifying manufactured and imported chemicals and their annual volumes to the national authorities. By managing these and many other EU and national requirements Neste has gathered depositories of data on hazardous chemicals. Reporting substances of concern as defined in the ESRS are managed together with the work related to these regulatory requirements.

### Chemical substances

The substance is a substance of concern (SoC) if it

- Is a Substance of Very High Concern (SVHC) as identified in accordance with the EU REACH Regulation and added by European Chemicals Agency (ECHA) to the candidate list for authorization (subsection i. in the definition of SoC in EC 2023/2772);

- Has harmonized classification in Part 3 of Annex VI to EU CLP Regulation with one of the hazard classes or hazard categories declared in the subsection ii. in the definition of SoC in EC 2023/2772;
- Has negative effects on reuse and recycling according to the EU product-specific ecodesign requirements. Ecodesign for Sustainable Products Regulation (ESPR) entered into force in July 2024, and it establishes a framework for setting ecodesign requirements on specific product groups.

Chemical substances are identified by the CAS/EC number that is declared in the SVHC list and in Annex VI to CLP. Neste has introduced CAS/EC numbers of the chemicals in its ERP systems so that substances of concern can be screened and amounts calculated.

None of the chemicals Neste supplies as feedstock or manufactures is listed in the SVHC list by ECHA. However, many of the petroleum products are included in

the Annex VI to CLP due to harmonized classification of health effects such as carcinogenicity. Majority of the reported amounts are from substances that are hazardous to health because there is no harmonized environmental classification in CLP Annex VI e.g., for petroleum products. However, petroleum products have properties that are hazardous to the environment and thus self-classified to indicate the environmental hazards. The self-classification is declared e.g., in the safety data sheets.

### Emissions

Production sites evaluate SoC emissions that are identified as significant in accordance with their environmental permits or other authority or legal requirements. The main reference for the identification is the Annex II of the Industrial Emission Portal Regulation (EC) No. 2024/1244, which also covers the most significant SoC/SVHC polluting substances.

In 2025, Neste reports the total amount of substances of concern that leave its refineries as emissions to the environment and that can be identified with certainty and estimated or measured in a reliable manner in terms of the amount of such emission. The reporting refers to the Annex II of the EU's Industrial Emissions Portal Regulation (2024/1244) and focuses on those substances that exceed the threshold values of the aforementioned Regulation for air, water and soil. In terms of air emissions, reported pollutants are carbon monoxide (over 95% of total reported SoC emissions), benzene, hydrogen cyanide and vinyl chloride. The environmental permits of all sites and local regulations allow these emissions. Carbon monoxide is formed in the combustion processes, but upon entering the atmosphere, it oxidizes further into carbon dioxide, which is not classified as SoC. Less than 0.1% of total reported SoC emissions (such as phenol, nickel and zinc) end up in water courses. These emissions have not been found to have a significant impact on, for example, the state of receiving water bodies.

Benzene has been identified and reported as the most significant SoC substance of non-methane volatile organic compounds (NMVOC) emissions at the Porvoo

refinery. Neste is aware that other SoC substances can potentially also be present in NMVOC emissions. The total NMVOC of oil refineries is calculated as total carbon and the exact composition has not been reported.

As the reporting definitions become more precise and the general knowledge base accumulates, the reporting of SoC emissions will be re-evaluated.

**Validation by an external body other than the assurance provider:** Neste is subject to annual environmental authority inspections and conducts emission reporting to competent authorities. Neste annually reports to its competent authority data on the releases to air, water and land of pollutants listed in IEPR Annex II for which the applicable threshold specified in that Annex is exceeded to the extent required in environmental permits or other national requirements. The authorities assess the quality of the data, in particular the accuracy, completeness, consistency and credibility. This process is based on the requirements of the Industrial Emissions Portal Regulation (IEPR).

In Singapore the national water agency (PUB) regulates the sewerage system, as well as the treatment and discharge of industrial wastewater into public sewers. The industrial wastewater from the Singapore refinery is discharged to these sewers. If necessary, they must be treated to specified standards before being discharged into a sewer.

**Incident of non-compliance concerning the health and safety requirements of products** (entity-specific KPI) is an incident involving non-compliance with regulations resulting in a fine, penalty or warning. Incidents of non-compliance concerning the health and safety requirements of chemicals are reported according to the Neste management system. The metric is based on the definitions in GRI indicator 416-2. The KPI has not been validated separately by an external third party.

## E4 Biodiversity and ecosystems

### Material impacts, risks and opportunities

Neste has identified the following material impacts, risks and opportunities with regards to biodiversity:

Direct impact drivers of biodiversity loss		
<b>Positive impacts</b>	Upstream	The use of waste and residue raw materials for renewable products can contribute to positive impacts for biodiversity in the upstream value chain. These short- to long-term impacts include reduced pressures on land use and land conversion, as well as reducing environmental pollution.
<b>Negative impacts</b>	Upstream	Upstream extraction and potential incidents, such as spills, across the supply chains of raw materials and utilities, can damage terrestrial and marine ecosystems, habitats and species or result in soil and marine pollution in the short- to medium-term.
<b>Opportunities</b>	Upstream	Using waste and residue raw materials and novel vegetable oils from regenerative agricultural practices can reduce land use impacts from agriculture and lead to e.g., access to new markets, new material streams or strengthened brand value. The opportunity applies across short- to long-term time horizons.
<b>Risks</b>	Upstream	Biodiversity loss mitigation can pose a transition risk for Neste's renewable raw material pool through increased nature-related requirements which might e.g., limit the availability of raw materials or increase supply chain complexity. The risk applies in the medium- to long-term.

Neste's material biodiversity impacts, risks and opportunities are related to green transition in society. The key strategic choices by Neste that address material impacts, risks and opportunities related to biodiversity are the focus on renewable and circular solutions and reducing reliance on fossil fuels. Neste continues to work toward increasing the availability of renewable and recycled raw materials, while developing technologies to diversify its current portfolio with new scalable raw materials. These actions support the company's resilience to biodiversity and ecosystems-related risks. Neste is also addressing its material biodiversity risks and impacts through landscape initiatives. These projects aim, among other things, to prevent deforestation, develop sustainability awareness and drive structural change to promote forest conservation in Neste's renewable raw material supply chain.

Neste's material biodiversity-related impacts arise from activities in the upstream value chain. No material biodiversity-related impacts on biodiversity-sensitive areas have been identified for Neste sites. Neste has

conducted biodiversity evaluation and identified some vulnerable species and habitats close to its refinery in Porvoo and terminal in Naantali, Finland. This includes for example, a 3-hectare forest area out of a total of 300 hectares of its land in Naantali protected under national legislation. Neste undertook biodiversity baseline inventories at Porvoo and Naantali between 2022 and 2023 to identify potential mitigation measures. Certain areas with moderate biodiversity values with potential for biodiversity impact mitigation were defined, based on national and European regulation.

In 2025, the company complemented previous evaluations with an assessment of biodiversity-sensitive areas near Neste's direct operations. In addition to the protected forest area within the Naantali site, there are three nature conservation areas or protected sites located within 2 km from Neste's production sites in Finland (Porvoo) and in The Netherlands (Rotterdam and Sluiskil). Material negative impacts in Neste's value chain are not related to land degradation, desertification and soil sealing.

### Processes to identify biodiversity- and ecosystem-related impacts, risks and opportunities

Neste has increased its understanding of biodiversity-related risks and opportunities through holistic materiality analyses. These assessments have covered both transition- and systemic biodiversity risks and opportunities.

The initial Neste biodiversity impact and risk materiality assessment was conducted in 2021, which consisted of in-house interviews focusing on evaluating anticipated magnitude, irreversibility, frequency and likelihood of impacts and risks. The approach is aligned with Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) recognized pressures on biodiversity and ecosystem change. Material topics were identified in Neste's supply chain, and included land use and land use change, fresh water use and pollution. The assessment and prioritization of the upstream and direct operations material biodiversity impacts and risks continued in 2022 with the Science Based Targets Network (SBTN) methodology for

nature and further in 2023–2024 within the SBTN initial validation pilot for the development of land and fresh-water targets. The methodology includes screening of key biodiversity aspects and pressures based on ISIC (International Standard Industrial Classification of All Economic Activities) sector related risk categories.

Based on these evaluations, Neste's upstream value chain was identified as material when considering biodiversity. The collaboration with the non-governmental organization (NGO) Fauna & Flora in 2022–2024 provided further insights into the material supply chains from the biodiversity perspective.

The opportunities and dependencies assessments were further developed in the double materiality assessment process in line with ESRS requirements, including transition and physical risks and opportunities related to biodiversity and ecosystems. Impacts and dependencies on ecosystems or ecosystem services have also been assessed.

Neste's materiality assessments for biodiversity have been conducted with internal stakeholders and external experts, including Fauna & Flora and SBTN. As described in the [ESRS 2 General disclosures](#) section of this report (see Stakeholder engagement and Double materiality assessment process), Neste engages with local communities, production site neighbors and other stakeholders to identify and mitigate biodiversity impacts in the value chain. Affected communities have not directly been involved in Neste's biodiversity materiality assessment.

Neste is participating in landscape initiatives, where collaboration with local communities has provided insights on biodiversity in Neste's upstream renewable value chain. In the Siak and Pelalawan Landscape Programme in Indonesia, targeted communities are supported in village-level regulations on land use, forest and natural ecosystem protection, to safeguard their shared biological resources and critical ecosystems from the negative impacts of palm oil production. Participatory community consultations to map remaining forests strengthened community-led forest protection and initiated community-based mangrove protection at selected villages.

Engagement with SBTN and the materiality assessment tool used therein has helped Neste to understand its business' resilience in relation to biodiversity-related risks. However, the work thus far does not yet fulfil ESRS requirements for a resilience analysis of Neste's business model to biodiversity-related transition and systemic risks.

## Policies

Neste's key policies and principles concerning biodiversity are the **Sustainability Policy** and the **Supplier Code of Conduct**. In addition, the **Sustainability Principle, Responsible Sourcing Principle** and **Supplier Sustainability Approval Principle** set requirements for how biodiversity matters are considered in the

company's upstream value chain and in its relationships with suppliers. The **Code of Conduct** sets Neste's commitment on reducing environmental impacts, which includes strengthening the protection of biodiversity and high conservation value areas, promoting and supporting the resilience of their natural values as well as preventing deforestation. The Code of Conduct is described in the [G1 Business conduct](#) section.

**Neste's Sustainability Policy** includes promoting sustainable land and water use and mitigating environmental impacts from pollution as required under regulation. As described in the **Sustainability Principle**, Neste aims to protect the natural environment in the areas where it operates, as well as the surrounding communities. Neste monitors environmental quality, including air, marine, and groundwater, at relevant sites and takes action to rectify any potential environmental damage caused by its operations.

The Sustainability Principle also sets out Neste's commitment to biodiversity in its sourcing activities. Neste aims to avoid the conversion of habitats with valuable biodiversity for biomass production and encourages strengthening the protection of biodiversity and high conservation value areas. The company accepts only renewable raw materials that fulfill the regulatory requirements for traceability at minimum. The Sustainability Policy and Sustainability Principle are described more in detail in the [E1 Climate Change](#) section of this report.

More detailed biodiversity requirements for Neste's renewable raw material suppliers are set out in the **Responsible Sourcing Principle**. Neste expects its suppliers to share its commitment to promote positive impacts and prevent habitat conversion. Neste works to prevent deforestation and habitat conversion, as well as other environmental impacts. The Responsible Sourcing Principle covers the management of material biodiversity-related impacts, risks and opportunities related to the sourcing of renewable raw materials.

The Responsible Sourcing Principle prohibits sourcing from areas where feedstock production has adversely affected land use and habitat conversion of forested areas, wetlands, grasslands, and other natural ecosystems. Neste encourages any future development of biomass production to take place on degraded lands, or lands where cultivation increases the carbon stock of those areas, and monitoring is conducted in line with Neste's due diligence processes, where relevant. The Responsible Sourcing Principle also contains requirements on community land rights and food security, sustainable land practices, direct impact drivers of biodiversity and impacts on ecosystem services, the extent and condition of ecosystems and the state of species. Further information on the Responsible Sourcing Principle is available in [E5 Resource use](#).

All Neste's renewable raw material suppliers are approved in accordance with the **Supplier Sustainability Approval Principle**, which outlines requirements relevant for the protection of biodiversity, such as the traceability of renewable raw materials. The Principle and the outlined approach for sustainability due diligence supports the management and mitigation of Neste's material impacts and risks related to biodiversity in its renewable raw material value chain.

In accordance with the **Supplier Code of Conduct**, Neste's suppliers are encouraged to establish and implement procedures to minimize any adverse impact of their operations on the environment, while also demonstrating continuous improvements. Neste does not have a specific policy covering sustainable oceans practices in its value chain, but the Supplier Code of Conduct addresses environmental impacts, including impacts on oceans. The Supplier Code of Conduct contributes to the mitigation of Neste's material impacts and risks related to biodiversity and covers several factors that directly contribute to impacts on biodiversity, such as emissions to air and water. The Supplier Sustainability

Approval Principle and Supplier Code of Conduct are described in detail within the [G1 Business conduct](#) section of this report.

General governance, including the highest level of accountability for policies, and stakeholder engagement related to policy implementation are described in the [ESRS 2 General disclosures](#) section of this report.

## Targets

As part of its sustainability vision, Neste aims to drive positive impacts on biodiversity in its operations and in its value chain. Neste is committed to develop its biodiversity approach and science-based methodology to assess, prioritize, mitigate and track impacts identified for land, water and pollution, in line with EU Corporate Sustainability Due Diligence Directive, which supports the policy objectives of the Sustainability Policy, Responsible Sourcing Principle and Supplier Code of Conduct. Neste does not have separate measurable, time-bound and outcome-oriented targets specific to upstream material biodiversity impacts, risks and opportunities. Neste tracks the effectiveness of policies and actions through other relevant metrics and key performance indicators. These include for example, KPIs under the [E1 Climate change](#) and [G1 Business conduct](#) sections of this report, which focus on the reduced reliance on fossil resources and implementing environmental requirements within the supply chain, respectively.

## Actions and resources

### Actions

To cover its biodiversity-related impacts, risks and opportunities in its upstream value chain, Neste works with suppliers to implement the Supplier Code of Conduct requirements. Neste's due diligence process for its suppliers is further described in the [G1 Business conduct](#) section. For example, Neste conducts a sustainability review of all new crude oil suppliers with the aim to reduce impacts to the environment and ensure suppliers have sufficient environmental policies and practices in place, with a focus on crude oil production-specific issues.

Neste aims to advance circular economy and resource efficiency through utilizing waste and residue raw materials in the production of its renewable products. As a result, the demand for virgin raw materials can be decreased, alleviating the pressure on natural resources

and reliance on crude oil and other fossil resources. The use of waste materials instead of crop-based raw materials is aligned with the EU Biodiversity Strategy goal of prioritizing renewable energy solutions favorable to biodiversity. Actions related to expansion and diversification of Neste's renewable and recycled raw material portfolio are described in [E5 Resource use and circular economy](#). Further information on actions related to increasing the use of renewable and recycled raw materials and reducing reliance on fossil fuels is provided in [E1 Climate change](#).

Scope of actions is in the upstream value chain, especially focusing on sourcing of renewable raw materials. Thus far, Neste's actions for biodiversity have predominantly concentrated on avoiding impacts on land, water, and pollution, which have not necessitated the incorporation of local or indigenous knowledge, nor the encompassing of nature-based solutions.

### Expected outcomes

These actions are expected to mitigate biodiversity risks in Neste's supply chains, and eventually reduce impacts identified for land, water and pollution and enhance waste material utilization, in line with Neste's Sustainability Policy and other biodiversity and ecosystems-related policy commitments.

### Resources to implement actions

Implementation of the actions reported above did not require significant (> 50 MEUR) financial resources during the reporting year, and is not expected to require such resources in the future.

## Impact metrics related to biodiversity and ecosystems change

Neste follows key frameworks and engages in collaborations in developing impact metrics related to biodiversity. Neste has been collaborating with the World Business Council for Sustainable Development (WBCSD) and closely following SBTN methodology to develop metrics and indicators to monitor biodiversity mitigation actions.

Action area	Description	Actions in 2025	Planned actions
<b>Nature-related risks of upstream activities</b>	Evaluating and assessing the dependencies and impacts of prioritized raw materials on biodiversity and natural ecosystems, and locate where those impacts are taking place.	<p>Neste has identified its prioritized raw materials based on the SBTN pilot exercise and other, previously conducted, biodiversity impact and risk materiality assessments. In 2025–2026, Neste continues its learning journey with the SBTN Land Method version 2 pilot as observer.</p> <p>Internally, Neste began an exercise of data gathering and mapping to increase understanding of current data gaps.</p>	<p>Neste plans to further assess prioritized raw materials critical for biodiversity and natural ecosystems, and continue to develop metrics and indicators to monitor biodiversity mitigation actions. Overall, the aim is to develop,</p> <ul style="list-style-type: none"> <li>i) a materiality and risk assessment process for upstream activities in the short- to medium term, and</li> <li>ii) action plans to mitigate risks and impacts on land, water and pollution in the long term.</li> </ul>
<b>Novel vegetable oils and regenerative agriculture</b>	Neste's activities related to novel vegetable oils (NVOs) focus on three concepts, i.e. low-carbon intensity, intermediate cropping and severely degraded land. These activities are aimed at: i) producing novel vegetable oils using regenerative agriculture management practices, reducing indirect land use changes, and ii) improving soil health and biodiversity in agroecosystems.	<p>In 2025, Neste collaborated with the International Sustainability and Carbon Certification (ISCC) body to develop a regenerative agriculture add-on that couples with the ISCC First Gathering Point (FGP) certificate. The criteria for the add-on were developed based on results of sustainability case studies on novel vegetable oils and will be tested in farms producing intermediate crops.</p> <p>Additionally, a long-term plantation trial was established to understand the feasibility of cultivation in different soil types.</p>	<p>Going forward, collaboration with relevant organizations will be continued to increase the understanding on</p> <ul style="list-style-type: none"> <li>i) improving soil carbon methodologies,</li> <li>ii) increasing carbon build up in the soil and improving its measurement, and</li> <li>iii) improving GHG emission savings of novel vegetable oil feedstocks.</li> </ul> <p>These actions are especially relevant in the long-term.</p> <p>Monitoring of the trial plantation established in 2025 and evaluation of potential projects related to severely degraded land will continue in different geographies, depending on e.g., the implementation of relevant regulations.</p>

## E5 Resource use and circular economy

### Material impacts, risks and opportunities

Neste has identified the following material impacts, risks and opportunities with regards to resource use and circular economy:

Resource inflows, including resource use		
<b>Negative impact</b>	Upstream	Use of virgin raw materials leads to depletion of finite resources, which is a driver for long-term scarcity, ecosystem disruption and biodiversity loss. This negative impact applies in the short- to long-term.
<b>Opportunity</b>	Upstream	Circular economy drivers can bring opportunities for Neste in the medium- to long-term. These include, for example, increased availability of new or existing raw materials and incentives or mandates to support the utilization of renewable and circular resources in the chemical industry.
<b>Risk</b>	Upstream	Competition, trade policies or import restrictions may reduce availability or create price volatility for raw materials, impacting Neste's profitability. This poses a short- to long-term risk for Neste.

The identified impacts, risks and opportunities interact especially with the following four dimensions of Neste's strategy and business model: renewable and recycled raw materials, resource efficiency and environmental impacts in own operations, renewable and circular solutions and innovation and collaboration.

- **Renewable and recycled raw materials:** Neste is working to diversify its current portfolio with scalable new raw materials as well as to develop technologies enabling their use. This helps to reduce the reliance on fossil raw materials. To mitigate the negative environmental impacts from the use of virgin raw materials, Neste is committed to resource efficiency and circular economy practices, ensuring sustainable management of resources throughout its operations.
- **Resource efficiency and environmental impacts in own operations:** All sites operated by Neste are responsible for understanding and managing their environmental impacts and aspects, including issues related to waste generation. Waste in Neste's own operations is handled by contracted third parties locally. Neste follows the local waste legislation in its

operations and continuously seeks new opportunities to minimize the waste sent to landfill and find new waste recovery solutions.

- **Renewable and circular solutions:** Neste's renewable and circular solutions have lower GHG emissions over the product life cycle when compared to fossil alternatives, and cater to the demanding needs of transportation, aviation, marine, polymers and chemicals industry and other industrial uses.
- **Innovation and collaboration:** Innovation has enabled Neste's transformation from a local oil refining company towards global leadership in renewable fuels. The focus of Neste's innovation and R&D work is to support and enhance Neste competitiveness. Neste collaborates with various stakeholders, including universities and research institutes to advance raw material and technology development.

The above elements of Neste's strategy and business model support resilience with relation to the impacts, risks and opportunities identified regarding resource use and circularity.

### Policies

The policies and principles described below are utilized to manage Neste's material impacts, risks and opportunities related to resource use.

Through the **Sustainability Policy**, Neste sets out its guidelines on using natural resources and working towards a more efficient value chain by providing solutions taking advantage of waste and residue raw materials and contributing to a circular economy and therefore helping to reduce the dependency on virgin fossil raw materials. In the related **Sustainability Principle**, Neste sets out relevant requirements for the sourcing and use of renewable resources, in alignment with relevant regulatory requirements. More detailed information regarding the Sustainability Policy and Principle is available under the [E1 Climate change](#) section.

Neste's key principles relating to the sustainability of its renewable raw material supply chains are the **Supplier Code of Conduct** and the **Responsible Sourcing Principle**. Additionally, the **Supplier Sustainability Approval Principle** sets the minimum sustainability requirements for approving renewable raw material suppliers. The Supplier Code of Conduct, applicable for all

Neste's raw material suppliers, and the Supplier Sustainability Approval Principle are described more in detail under [G1 Business Conduct](#).

In addition to the Supplier Code of Conduct, renewable raw material suppliers need to comply with Neste's Responsible Sourcing Principle. Neste expects its suppliers to have the same commitment to promote positive impacts and to prevent habitat conversion throughout its supply chain. Neste works to prevent deforestation, habitat conversion, and other social and environment negative impacts. The Responsible Sourcing Principle is aligned with relevant regulatory requirements, such as the EU RED and the US Renewable Fuels Standard (RFS), and the UN Guiding Principles on Business and Human Rights.

Neste monitors the implementation of these principles through sustainability due diligence, as described in the [G1 Business Conduct](#) section. General governance, including the highest level of accountability for the policy, and stakeholder engagement related to policy implementation are described in the [ESRS 2 General disclosures](#) section of this report.

## Targets

To address the material impacts, risks and opportunities related to resource use and circular economy, Neste continues to strengthen and expand its raw materials portfolio and global sourcing capabilities. Neste does not have separate measurable, time-bound and outcome-oriented targets in place for the material impacts, risks and opportunities related to resource use and circular economy. Neste tracks the effectiveness of policies and actions through other relevant metrics and key performance indicators, which include for example, the Supplier Code of Conduct KPI as introduced under the [G1 Business conduct](#) section of this report.

## Actions and resources

### Actions

Neste's main actions related to resource use and circular economy include the use of renewable and recycled raw materials in the production of renewable and circular solutions as well as the continuous development of supplier relationships, as further described in the adjacent table. These actions span over the short-, medium and long term. To align with the material impacts, risks and opportunities identified, the scope of the actions is especially focused on the company's upstream value chain and the use of renewable, particularly waste and residue, and recycled raw materials. Neste aims to advance resource efficiency and circular economy through utilizing renewable raw materials, particularly waste and residue, and recycled raw materials in its products. As a result, the demand for virgin raw materials could be decreased, alleviating the pressure on natural resources and reliance on crude oil and other fossil resources. Further information on actions related to increasing the use of renewable and recycled raw materials and reducing reliance on fossil fuels is provided in the [E1 Climate change](#) section.

## Expected outcomes

By implementing these actions, Neste aims to manage the identified material impact related to the use of virgin raw materials and the risks and opportunities related to the use of renewable, particularly waste and residue, and recycled raw materials. The actions also support the implementation of the objectives in Neste's Sustainability Policy on providing solutions taking advantage of waste and residue raw materials and contributing to a circular economy.

## Resources to implement actions

Implementation of the actions listed above as well as the related actions under [E1 Climate Change](#) section are expected to require significant (>50 MEUR) financial resources. Implementation of these actions may be subject to individual investment decisions and depend on various factors, including external drivers such as market development and supportive policy environment.

Action area	Description	Actions in 2025	Planned actions
<b>Raw material portfolio expansion and diversification</b>	Neste sources renewable raw materials globally for its renewables refineries in Finland, the Netherlands and Singapore, and for its joint operation in California in the US. Neste continues to work towards increasing the availability of renewable and recycled raw materials and developing technologies to diversify its raw material portfolio with new scalable alternatives, such as lignocellulosic waste and residues.	<p>Neste continued actions towards increasing the availability of emerging, lower-quality waste and residue raw materials. In 2025, Neste's technology and innovation expenditure was EUR 63 (86) million, which includes R&amp;D for new raw materials and the technologies that could enable their use.</p> <p>For example, Neste started cooperation to develop technologies for processing lignocellulosic waste and residues into renewable fuels.</p> <p>Neste is also exploring novel vegetable oils produced with regenerative agricultural practices. More information is available in the <a href="#">E4 Biodiversity and ecosystems</a> section.</p>	Neste will continue these actions in line with business needs and priorities. Neste's long-term raw material development efforts are centered on studying the potential of forest industry and agricultural waste and residues (lignocellulose) as future raw materials, and on developing technologies to enable their use.
<b>Continuous development in supplier relationships</b>	Neste works to eliminate deforestation, habitat conversion, and other social and environmental negative impacts.	Further information on current actions related to the development in supplier relationships is provided in the <a href="#">S2 Workers in the value chain</a> and <a href="#">G1 Business conduct</a> sections.	Neste will continue developing its supplier due diligence in accordance with upcoming regulations, such as the Corporate Sustainability Due Diligence Directive.

## Metrics

Resource inflows	2025	2024
Overall total weight of products and technical and biological materials used during the reporting period, tons	17,190,000	15,285,000
Biological materials, %	24	25
The absolute weight of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture Neste's products and services, tons	5,000	2,000
Secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture Neste's products and services, %	0	0

### Reporting principles

The following materials are included in the resource inflow metric:

- Total weight of renewable and fossil raw materials used in production, including co-processed volumes
- Purchased hydrogen used in production
- Natural gas used in production
- Recycled (liquefied waste plastic) raw materials used for production
- Ethanol used in production
- Purchased propane used in production
- Raw materials used for blending.

The metrics described above have not been validated separately by an external third party. Neste uses only renewable raw materials that fully meet the sustainability requirements specified in the legislation in its key markets. Neste further addresses sustainability in its renewable fuel production chain through certifications such as European Commission-approved voluntary schemes like ISCC EU and national verification schemes. All Neste renewable product refineries have EU-compliant International Sustainability and Carbon Certification (ISCC) certificates. The data for resource inflows metrics are collected from Neste's internal source systems. Data in source systems is based on e.g., direct measurement and invoicing.

# Social information

## S1 Own workforce

### Material impacts, risks and opportunities

Neste has identified the following material impacts, risks and opportunities with regards to own workforce:

Working conditions: Health and safety		
<b>Negative impact</b>	Own operations	Hazardous processes in Neste's operations could directly impact own employees' health and safety in the short-term.
<b>Risk</b>	Own operations	Workplace injuries and/or ill-health of Neste's employees can lead to various financial effects from one-off costs to prolonged production disruptions, due to injuries, sick leave costs, and potential safety related process shutdowns. This represents a short-term risk for the company.
<b>Opportunity</b>	Own operations	With a robust safety management system and implementing preventive measures for health and safety hazards, Neste aims to prevent injuries as well as reduce sick leaves and downtimes caused by incidents and accidents. The opportunity primarily applies in the short-term.

Safety is a fundamental prerequisite for Neste's business. In 2025, Neste updated its safety vision, "Creating safety together", to emphasize the actions, skills, expertise and safeguards needed to maintain safe and reliable operations every day. Neste's ambition is to continually prevent fatalities, serious injuries, occupational illnesses, major accidents and compliance incidents across all operations. Achieving this is essential for protecting people, ensuring business continuity and supporting long-term performance.

Safety is an integral part of Neste's values and culture, and is essential for fostering a psychologically safe working environment. Neste's dependence on its own workforce presents both material risk and opportunities concerning employee safety. A robust safety management system can enable the company to prevent and reduce negative impacts on employees working at refineries and other sites. Strong safety awareness and understanding of hazards, risks and opportunities support systematic and effective safety management. All of Neste's own employees are included in the scope of disclosure for this report.

Material negative impacts related to employee health and safety may affect Neste's employees working on production sites, commercial operations, and construction and maintenance projects. These impacts can range

from individual cases to more widespread or systemic issues. Operations in a high-hazard industry requires rigorous and systematic safety management to protect people and the environment, and to safeguard operations, assets, information and brand integrity. Workplace assessments and regular safety reporting help Neste identify and understand these material negative impacts and inform continuous improvement.

### Policies

#### Working conditions

Neste has the following policies, principles and management systems in place to manage impacts, risks and opportunities related to employee health and safety:

The **People Policy** provides a framework for Neste's people processes and practices that support strategy execution and business performance. Neste's values – we care, we have courage, we cooperate – underpin its culture, performance leadership and efficient ways of working. The Policy also sets the company's commitment to providing a safe and healthy workplace. It applies to all Neste Group employees. A public summary is available on Neste's website, and the full Policy is available internally through the Neste Management System.

The foundations of safety excellence and continuous improvement are defined by Neste's **Operations Excellence Policy** and **Operations Excellence Management System (OEMS)**. OEMS consists of the Operations Excellence Policy, Principles and supplementary detailed Standards. The requirements apply to all Neste employees and to anyone working for or representing any business entity within the Neste Group. The objectives of Operations Excellence at Neste are to:

- Prevent fatalities, injuries and incidents
- Ensure effective safeguards that protect people, the environment and property
- Assure employee and contractor health and wellbeing
- Manage product compliance and chemical safety hazards
- Sustain asset integrity and reliable operations
- Optimize resource and energy use
- Ensure product and service quality meets customer needs
- Comply with laws, regulations and permits
- Drive continuous improvement in OEMS implementation.

Neste's OEMS is based on continual improvement and process-based thinking and is aligned with ISO

Standards 9001, 14001 and 45001. The leadership teams of Neste's business areas and functions are responsible for implementing the Policy in daily operations. The implementation of the Policy is monitored through on-site OEMS audits. All organizations in scope of the OEMS undergo internal audits in line with the Continual Improvement Principle, with each Principle (element) audited at least every three years. The Policy is publicly available on Neste's website, while the detailed Principles and Standards are accessible internally in the Neste Management System. The Policy covers impacts, risks and opportunities related to employee safety and defines Neste's approach to preventing workplace accidents.

The **Safety Leadership Principle** sets the minimum requirements and expectations for safety leadership and accountability across Neste. It includes the Life Saving Rules and Stop Work Authority and covers impacts, risks and opportunities related to employee safety. The Principle applies to all Neste employees and to anyone working for or representing any business entity within the Neste Group. It is available internally through the Neste Management System. Members of the Neste Leadership Team are responsible for overseeing its implementation within their respective business areas and functions.

## Human Rights

**The Human Rights Principle** describes Neste's commitment to respect human rights and engage in the remediation of adverse human rights impacts throughout its business operations and value chains. As stated in the Principle, Neste demonstrates and meets this commitment by implementing, and acting in accordance with, the United Nations Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises. Neste respects internationally recognized human rights as set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the ILO Declaration on Fundamental Principles and Rights at Work.

The Human Rights Principle explains how Neste implements an ongoing process of human rights due diligence to identify, prevent, mitigate and account for how it addresses adverse human rights impacts on people. This covers actual and potential human rights impacts that Neste may cause or contribute to through its own activities, or which may be directly linked to its business operations, products or services.

Stakeholder engagement is a key component of Neste's human rights due diligence activities. Neste implements stakeholder engagement as an ongoing process of interaction and dialog with its affected stakeholders, including its own employees, employees of contractors and service providers, supply chain workers, communities and customers. The Human Rights Principle also outlines Neste's approach to remediating adverse impacts. Neste provides access to appropriate and effective remedy by making efficient grievance mechanisms available. Where Neste identifies that it has caused or contributed to adverse impacts, Neste provides for or cooperates in remediation through legitimate processes intended to deliver remedy. Where adverse impacts have occurred that Neste has not caused or contributed to, but which are directly linked to Neste's activities through its business relationships, Neste seeks

to use its leverage to prevent or mitigate the risk of the impacts continuing or recurring.

The Human Rights Principle explicitly addresses trafficking in human beings, forced labour or compulsory labour and child labour. It also specifically addresses discrimination and harassment, and the promotion of equal opportunities and other ways to advance diversity and inclusion. The Human Rights Principle prohibits discrimination on the basis of any grounds, including for example, gender, race, color, ethnic origin, nationality, age, pregnancy, sexual orientation, gender identity, disability, religion or political opinion. This applies to all areas of employment. The Human Rights Principle applies to the entire Neste group and is publicly available on Neste's website.

Major updates to the Human Rights Principle typically include consultation with both internal and external stakeholders. During an external consultation process, Neste seeks recommendations for improvements for example from recognized topic experts, such as human rights NGOs, government representatives and trade union experts. Internally consultation and feedback is gathered broadly within for example Sustainability, Human Resources, Safety, Public Affairs, Compliance and Legal functions.

Neste's **Supplier Code of Conduct**, which includes requirements related to the safety of workers, is described in the [G1 Business conduct](#) section. Requirements related to the human rights of supply chain workers are detailed in [S2 Workers in the value chain](#).

General governance, including the highest level of accountability for policies, and stakeholder engagement related to policy implementation are described in the [ESRS 2 General disclosures](#) section of this report.

### Processes for engaging with own workers and workers' representatives

Continuous engagement and communication ensure that employees at Neste are informed and consulted. Neste conducts global employee engagement surveys annually to understand how the company's operations impact its employees and to identify expectations for

improvement. These surveys gather direct input from employees on topics such as engagement, strategy, leadership, wellbeing and safety. Employee surveys are used to integrate feedback into decision-making and concrete action plans at every team level. Agreed actions are communicated and monitored across the organization to develop engagement and ways of working. The effectiveness of these actions is assessed, for example, through the employee engagement scores in the next survey cycles. The EVP, People & Culture is accountable for ensuring these engagement activities take place.

At the local level, employee cooperation follows the specific legal and collective-agreement requirements in each country of operation. Neste is committed to complying with applicable local collective agreements. Neste maintains established cooperation bodies in its main operating countries, including Finland, the Netherlands and Singapore. In 2025, a European Works Council (EWC) was established following collaborative negotiations with employee representatives from European countries. The agreement will become effective in March 2026.

Neste's Safety Leadership Principle sets the requirements for engaging the employees in occupational health and safety topics, including work practice development, incident investigation and risk assessments across all operations. Neste conducts OEMS audits to verify fulfilment of these requirements and to assess the effectiveness of related processes and the management system. The President and CEO and members of the Neste Leadership Team oversee the implementation of the Safety Leadership Principle within their respective business areas and functions.

Safety topics are also addressed in regular team safety discussions, which support peer-to-peer learning, sharing of experiences and continuous improvement. Team leaders are responsible for ensuring these discussions take place as required, with organization-level targets set for frequency and coverage. Feedback from team safety discussions is used to strengthen safety management practices and further develop Neste's safety culture.

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

### Grievance channel

Neste provides mechanisms for employees to raise concerns or grievances without fear of retaliation and is committed to handling issues fairly, confidentially and promptly. The process for reporting and managing grievances and Neste's policies regarding the protection of individuals reporting concerns are described more in detail under [G1 Business Conduct](#). Adverse impacts are remediated by providing and promoting access to grievance mechanisms and complaints channels, and by cooperating in the remediation of the adverse impacts that Neste has caused or contributed to.

### Remediation process for material negative impacts related to employee safety

In addition to general grievance channels, Neste's **Hazard Identification, Risk Assessment and Control Principle** includes processes, Standards and Work Procedures for workers to identify, assess and control workplace hazards. Key common requirements include process hazard analysis, process risk classification, process safety information and work risk management.

Neste applies the hierarchy of controls to guide hazard elimination and control. All Neste's employees and contractors have the authority to use the Stop Work Authority which empowers anyone to stop work and remove personnel from hazardous situations.

Neste's OEMS includes **Emergency Management** and **Crisis Management Principles** designed to ensure that each business has sufficient capability to detect and respond effectively to emergent situations which may affect worker health and safety or the environment. Neste's businesses are expected to meet the requirements of these principles to maintain this capability.

The OEMS **Incident Learning Standard** provides a structured process for reporting hazardous situations, supporting incident learning and identifying improvement actions. When a safety incident or near miss is reported, corrective actions are defined and the effectiveness of these actions is followed up within the responsible organization.

### Targets

Neste's safety targets contribute to the safety-related commitments set out in the Operations Excellence Policy, Safety Leadership Principle and People Policy.

Neste's safety targets have been set in line with Neste's safety vision "Creating safety together", the Operations

Excellence Policy, Safety Leadership Principle and industry best-practices to ensure minimal harm to workforce. The targets are continuous and compared to the company's performance in the previous year. Key performance indicators on total fatalities and total recordable injuries (TRIF) are in accordance with ESRS metrics, while Process Safety Event (PSER) is an entity-specific KPI.

Neste engages in a dialog with its employees to share the safety vision through, for example, "I Act Safe" workshops. Neste incorporates changes, including changing safety targets, tracking performance and identifying lessons or improvements as a result of performance.

### Progress in targets

In 2025, Neste's occupational safety performance (TRIF) 2.1 did not meet the target level (1.8). However, improvements were achieved as TRIF improved from 2.2 in 2024 to 2.1 in 2025. Process safety performance (PSER) was 0.9, which was better than the target level (1.0). PSER performance also improved from 1.3 in 2024 to 0.9 in 2025. Neste's safety performance and performance in targets is monitored monthly, including at Neste Leadership Team and at every Board of Directors meeting. Process and personnel safety targets are part of Neste's short-term incentives, as described in [ESRS 2 General disclosures](#).

## Neste's targets related to health and safety of own workforce

Targets	Key performance indicator	Performance in 2025 <sup>1)</sup>	Performance in 2024 <sup>1)</sup>
Permanent annual safety target of zero fatalities and serious accidents in own operations.	Total fatalities, own employees	0 fatalities	0 fatalities
Long term target to continuously reduce the risk of all accidents and increase the number of Safe Days in own operations.	Process Safety Event Rate (PSER) in own operations <sup>2)</sup>	0.9	1.3
	Total recordable injury frequency (TRIF) in own operations <sup>2)</sup>	2.1	2.2

<sup>1)</sup> Excludes green-field expansion projects where Neste is not responsible for the construction site.

<sup>2)</sup> Includes contractors working on Neste's sites.

## Actions and resources

### Actions

Neste's process for identifying and addressing health and safety matters is in line with its safety vision. The actions described in the adjacent table are continuous and part of Neste's daily operations and practices. Action areas are developed in line with the Operations Excellence Policy and are included in the "Creating safety together" -roadmap. Furthermore, it is ensured that the practices do not cause or contribute to any further impacts on Neste's own workforce. The initiatives are focused on Neste's own workforce, with some additional initiatives aimed at contractors and value chain workers. The effectiveness of the safety processes at Neste is followed through regular monitoring of the safety performance in the organization and OEMS audits in Neste's own operations.

### Expected outcomes

These activities are expected to lead to an enduring culture for safety and effective control of hazards and risks. Through these actions, Neste can improve the proactive identification and mitigation of workplace hazards, and reduce the incidence of injuries. The progress and effectiveness in the actions is monitored through Neste's targets described above.

### Resources to implement actions

Safety-related investments are part of prioritized maintenance operational or capital expenditures to ensure safety and operational reliability, and as such expected to require significant (>50 MEUR) operational and/or capital expenditures. Future financial resources allocated to safety and actions listed above may be subject to individual investment decisions and depend on various internal and external factors.

Action area	Description	Actions in 2025	Planned actions
<b>Prevention of fatalities and serious incidents</b>	Preventing fatalities and serious injuries is the focus of Neste's safety roadmap. Ensuring critical controls are in place, functioning and effective is vital for safe and successful high risk work.	In occupational safety, continued focus was placed on harmonizing the critical controls for three Safe Work Practices and verifying and validating their efficacy in the field.	Planned actions include continuing to harmonize practices for remaining Safe Work Practices according to plans.
<b>Continual improvement of the maturity of Neste's Operations Excellence Management System</b>	Neste's OEMS promotes excellence in process safety, through the design and construction of safe facilities, operations, life cycle asset management and regular inspections.	In 2025, Neste initiated a five-year Process Safety Improvement Program to make impactful and sustainable improvements in process safety group-wide.	Planned actions include executing Process Safety Improvement Program according to workstream goals and objectives.
<b>Investments prioritized to improve safety and reduce risk</b>	Incorporating safety into projects such as investments, change initiatives, and turnarounds remained Neste's focus in 2025. Neste places emphasis on organizational learning to ensure its success in this area. Additionally, strengthening safety protocols, improving hazard identification and risk assessment processes are part of these actions.	These actions are continuous and part of Neste's daily operations and practices, where relevant.	

## Metrics

### Characteristics of Neste's employees

#### Headcount by gender

Gender	2025	2024
Male	3,460	3,830
Female	1,476	1,744
<b>Total employees</b>	<b>4,936</b>	<b>5,574</b>

#### Headcount by Neste's main countries

Country	2025	2024
Finland	2,947	3,439
United States (USA)	771	870
The Netherlands	555	511
Singapore	406	451
Others	257	303
<b>Total</b>	<b>4,936</b>	<b>5,574</b>

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

	2025			2024		
	Female	Male	Total	Female	Male	Total
Number of employees	1,476	3,460	4,936	1,744	3,830	5,574
Number of permanent employees	1,369	3,016	4,385	1,641	3,294	4,935
Number of temporary employees	35	43	78	36	55	91
Number of non-guaranteed hours employees	72	401	473	67	481	548
Number of full-time employees	1,391	3,361	4,752	1,648	3,733	5,381
Number of part-time employees	85	99	184	96	97	193

#### Headcount by contract type, broken down by region

	2025				2024			
	Europe	Americas	Asia-Pacific	Total	Europe	Americas	Asia-Pacific	Total
Number of employees	3,719	778	439	4,936	4,203	878	493	5,574
Number of permanent employees	3,579	369	437	4,385	4,062	385	488	4,935
Number of temporary employees	75	1	2	78	86	0	5	91
Number of non-guaranteed hours employees	65	408 <sup>1)</sup>	0	473	55	493	0	548
Number of full-time employees	3,535	778	439	4,752	4,010	878	493	5,381
Number of part-time employees	184	0	0	184	193	0	0	193

#### The total number and rate of employees who have left Neste during the reporting period

	2025	2024
The total number of employees who have left Neste during the reporting period	1,125	1,184
The rate of employee turnover in the reporting period, %	22.8	21.2

### Collective bargaining and social dialog

Neste recognizes and respects the employees' rights to organize freely and bargain collectively. In 2025, 71% (2024: 65%<sup>2)</sup>) of Neste employees globally were covered by collective bargaining agreements. In addition to complying with local legal requirements, Neste is committed to respecting the internationally recognized human and labor rights and ensuring fair terms of employment for all employees, as set out in Neste's Code of Conduct and Human Rights Principle.

In the European economic area (EEA), Neste employees are covered by several different collective bargaining agreements.

Coverage rate	Collective bargaining coverage		Social dialog
	Employees – EEA (main countries) <sup>3)</sup>	Employees – Non-EEA (main regions) <sup>3)</sup>	Workplace representation – EEA (main countries) <sup>3)</sup>
0–19%		Americas	
20–39%		Asia-Pacific	
40–59%			
60–79%			
80–100%	Finland, The Netherlands		Finland, The Netherlands

<sup>1)</sup> US: Based on local legislation, no contractual obligation exists to offer the employees specified under this group a minimum or fixed number of working hours per day, week, or month. However, in practice, employees specified under this group have typically worked full-time hours in 2025. <sup>2)</sup> 2024 figure not fully comparable as reporting approach was updated to align with the ESRS in 2025. <sup>3)</sup> Neste's definition of its main countries is presented in the Reporting principles.

## Diversity

Distribution of employees by age group	2025		2024	
	Headcount	Percentage	Headcount	Percentage
Under 30 years old	470	9.5	584	10.5
30-50 years old	3,138	63.6	3,594	64.5
Over 50 years old	1,328	26.9	1,396	25.0

Gender distribution of top management	2025		2024	
	Headcount <sup>4)</sup>	Percentage	Headcount	Percentage
Female	13	28.3	31	33.3
Male	33	71.7	62	66.6

## Health and safety

Health and safety, own employees	2025	2024
Percentage of people in own workforce who are covered by health and safety management system	100	100
Number of fatalities in own workforce as result of work-related injuries	0	0
Number of fatalities in own workforce as result of work-related ill health	0	0
Number of fatalities in own workforce as result of work-related injuries and work-related ill health	0	0
Number of fatalities as result of work-related injuries of other workers working on Neste's sites	0	0
Number of fatalities as result of work-related ill health of other workers working on Neste's sites	0	0
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on Neste's sites	0	0
Number of recordable work-related accidents for own workforce <sup>5)</sup>	22	29
Rate of recordable work-related accidents for own workforce <sup>5)</sup>	2.4	2.8

<sup>4)</sup> Organizational restructuring in 2025 impacts comparability of headcount.

<sup>5)</sup> Excludes green-field expansion projects where Neste is not responsible for the construction site.

## Adequate wages

Based on the assessment done in 2025, all Neste employees receive an adequate wage. This has been confirmed in line with applicable benchmarks as defined in the ESRS, comparing employee salaries in the lowest pay category to the benchmark data on adequate wages. This benchmark data is established either in collective bargaining agreements, national or sub-national legislation or living wage references.

## Social protection

Neste's commitment to social protection is included in its Human Rights Principle. Employees in all Neste operating countries are covered by social protection for sickness, unemployment, injury, disability, parental leave and retirement, through public programs or benefits offered by Neste. In India, the same social protection coverage applies, with the exception that the coverage for unemployment starts after 4.8 years of employment. Compared to 2024, employees in Singapore are now covered by social protection for unemployment through a public program. The coverage of social protection is assessed annually, if any changes occur in the countries where Neste has employees or in the applicable public programs and employee benefits providing social protection.

## Incidents, complaints and severe human rights impacts

Suspected misconducts reported in person or via Neste's externally operated reporting channel Ethics Online to Neste Investigation Group are described under **G1 Business Conduct**. During 2025, four incidents of suspected misconduct related to discrimination or harassment were reported to the Neste Investigation Group. No cases of discrimination or harassment were confirmed. In addition, seven incidents of suspected misconduct related to Neste's own workforce, including cases related to employment matters and inappropriate behavior, were reported to Neste Investigation Group.

No severe human rights incidents (including cases of forced labor, human trafficking or child labor) related to Neste's own workforce were identified during 2025. Neste has not paid significant fines, penalties or compensation for damages related to the remediation of the reported incidents or complaints related to its own workforce in 2025.

## Reporting principles

**Headcount:** The reported headcount reflects the end of the reporting period (31.12.2025) and includes all Neste employees. The headcount typically increases during summer months due to summer trainees. The total headcount compared to previous year has decreased due to organizational change and related change negotiations. Note 8 Employee benefit costs in the Consolidated Financial statements includes the number of personnel in the reporting year. The number in the Financial statements is reported as an average headcount during the reporting year and does not include temporary hourly workers. Neste does not disclose employee figures for the categories 'Other' and 'Not reported' in the Headcount by gender table.

**Main countries:** The main countries presented in the Headcount by Neste's main countries breakdown and Collective bargaining and social dialog coverage include countries where Neste has employees representing at least 10% of its total number of employees, and countries where Neste has production capacity.

**The rate of employee turnover** includes the number of employees who have resigned or left due to dismissal, retirement, death, end of temporary contract or mutual consent divided by the headcount at the end of the reporting period. Leavers due to business transfer are not included.

**Collective bargaining and social dialog:** For determining the coverage rate of collective bargaining and social dialog, Neste personnel in all employee groups have been observed. Top management personnel are not typically included in collective bargaining agreements.

**Diversity:** Top management at Neste includes members of the Neste Leadership Team, members of the Business Area or Function Leadership Teams and the President and CEO of Neste's subsidiary Mahoney Environmental Solutions.

**Incidents, complaints and severe human rights impacts:** Neste reports the number of suspected misconducts reported in person or via the available reporting channels including Ethics Online to the Investigation Group. Neste's process for reporting and handling

grievances is described more in detail under [G1 Business Conduct](#). As the reporting approach for the disclosure has been defined during the reporting year, comparative information is not presented.

**Workplace accidents** are those accidents that occur at work or while performing work duties. Total Recordable Injuries (TRI) includes the recorded accidents at work which result in absence from work, restriction to work, medical treatment or fatality. Reported fatalities include workplace accidents or accidents during work-related travel causing an injury resulting in death within one year of the day of the accident.

**Total Recordable Injury Frequency (TRIF):** The formula for calculating accident frequency (number of accidents at work per million working hours): total number of accidents at work × 1,000,000 / hours worked. Neste's entity specific KPI for TRIF includes contractors working on Neste's sites, while ESRS-metrics related to health and safety refer to Neste's own employees.

**Process Safety Event Rate (PSER)** is the rate of process safety events per million hours worked. It includes PSE1 and PSE2 cases in Neste's own operations. Process safety performance is tracked in accordance with the American Petroleum Institute Recommended Practice 754.

PSE1 (Process Safety Event) is an unplanned and uncontrolled release of any material, including non-toxic and non-flammable materials, from a process resulting in a consequence according to the PSE1 classification.

Possible consequences:

- Injury leading to absence (LWI) or fatality.
- A hospital admission and/or fatality of a third party.
- Fires or explosions with direct costs (excluding loss of production) higher than EUR 100,000.
- An officially declared community evacuation or community shelter-in-place, including precautionary community evacuation or community shelter-in-place.
- An unignited release of material greater than or equal to the threshold quantities described in the American Petroleum Institute (API) Recommended Practice (RP) 754 Table 1, in any 1-hour period.

- Pressure relief discharge / upset emission to atmosphere that exceeds the PSE1 threshold value and has one or more of these consequences: Rainout; Discharge to a potentially unsafe location; An on-site shelter-in-place or on-site evacuation, excluding precautionary on-site shelter-in-place or on-site evacuation; Public protective measures, including precautionary public protective measures.

PSE2 (Process Safety Event) is an unplanned and uncontrolled release of any material, including nontoxic and non-flammable materials from a process, resulting in consequences according to the PSE2 classification.

Possible consequences:

- An employee, contractor or subcontractor recordable injury (RWI, MTC).
- Fires or explosions with direct costs (excluding loss of production) higher than EUR 2,500.
- An unignited release of material greater than or equal to the threshold quantities described in API RP 754 Table 1, in any 1-hour period.
- Pressure relief discharge / upset emission to atmosphere that exceeds the PSE2 threshold value and has one or more of these consequences: Rainout; Discharge to a potentially unsafe location; An on-site shelter-in-place or on-site evacuation, excluding precautionary on-site shelter-in-place or on-site evacuation; Public protective measures, including precautionary public protective measures.

**Hours worked:** The hours worked by the whole personnel and contractors during the period under review. When recording the working hours of contractors, an estimate (e.g. accounting hours) can be used if the accurate number of hours is not known.

The metrics related to the own workforce described above have not been validated separately by an external third party.

## S2 Workers in the value chain

### Material impacts, risks and opportunities

Neste has identified the following material impact with regards to workers in the value chain:

#### Other work-related rights: Forced labor

<b>Negative impacts</b>	Upstream	Workers in Neste's upstream supply chains for wastes and residues and third-party workers at Neste refineries may face risks of forced labor. Forced labor in the value chain can severely impact workers by harming their physical and mental health, restricting their freedom, eroding their dignity, and depriving them of basic human rights. Neste is exposed to forced labor risks through its business relationships, particularly in high risk geographies and sectors where forced labor is a systemic issue. These systemic issues present long-term, ongoing risks that necessitate continuous mitigation efforts.
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While Neste acknowledges that modern slavery can be found in all countries and industries, the company has identified its renewable products supply chains across Asia as having the highest risks for child, forced and indebted labor, with migrant workers being especially vulnerable to negative impacts. As detailed in Neste's Modern Slavery Statements, the palm oil sector <sup>1)</sup> in Southeast Asia is identified as being particularly high risk, based on the results of ongoing human rights due diligence conducted by Neste from 2016–2025, including collaboration with third-party experts, findings from on-the-ground sustainability audits and labor studies, human rights risk assessments, and collaboration in various multi-stakeholder initiatives. Based on the assessments, these forced labor risks are systemic, pre-existing structural issues, and not caused through Neste's business model or strategy.

In its own operations, Neste has identified construction and maintenance projects at its refineries in Singapore, Rotterdam and Porvoo as being high risk for exploitative practices and forced labor. During such projects, large numbers of third-party construction and maintenance workers temporarily work onsite at Neste's refineries, with numbers peaking during refinery shutdowns, turnarounds and expansion projects. This includes third-party migrant workers who may not be familiar with the local working language, culture, labor standards or legal

requirements, which makes them more vulnerable to labor exploitation. Recognizing these risks and understanding that exploitation is systemic in the construction industry, Neste has proactively adapted its sustainability work to safeguard the rights of third-party and migrant workers on its sites.

#### Policies

The following policies and principles cover the management of material impacts related to forced labor in Neste's upstream value chain:

Neste's **Code of Conduct** applies to the entire Neste Group and contains the key human rights requirements and expectations with which all Neste employees are to comply in their daily work. The Code of Conduct is described more in detail in the [G1 Business conduct](#) section.

The **Human Rights Principle** describes Neste's commitment to respect human rights and engage in the remediation of adverse human rights impacts throughout its business operations and value chains. It explains Neste's approach to implementing the UN Guiding Principles on Business and Human Rights and carrying out ongoing human rights due diligence and stakeholder engagement. The Human Rights Principle sets the standards for a rights-based approach in all of Neste's business decisions.

In accordance with the Human Rights Principle, Neste will not engage in or support the use of any form of forced or child labor, and is committed to identify, assess and address these risks in its global operations and value chains. This includes all situations of exploitation that a person cannot refuse or leave, because of threats, violence, coercion, abuse of power or deception, including, but not limited to trafficking in persons, slavery, servitude, forced marriage, forced labor, compulsory labor, debt bondage, involuntary prison labor, deceptive recruiting for labor or services, and child labor. The Principle also prohibits practices that can lead to forced labor such as document retention, recruitment fees, deceptive practices regarding employment contracts and violations of freedom of movement. The Human Rights Principle is described in more detail in the [S1 Own Workforce](#) section.

Neste's minimum human rights requirements for suppliers are outlined in the **Supplier Code of Conduct**, which references the Universal Declaration of Human Rights and ILO Fundamental Principles and Rights at Work. The Supplier Code of Conduct prohibits child labor and all forms of forced and compulsory labor. It also explicitly requires that all Neste suppliers ensure any recruitment fees and associated costs are not borne by their workers, and that all employees are made aware of the key terms of their employment prior to commitment

to work. These requirements are aimed at reducing the risk of precarious work, in combination with minimum requirements for suppliers to ensure a safe and secure workplace and comply with local labor laws. Neste's supplementary Supplier Code of Conduct Guide for Suppliers specifies that human trafficking is included under Neste's definition of forced labor, and provides further references to specific applicable ILO standards, such as the ILO Minimum Age Convention, 1973 (No. 138). Supplier Code of Conduct is described in more detail in the [G1 Business conduct](#) section.

The **Responsible Sourcing Principle** sets out additional requirements for all Neste's renewable raw material suppliers. The Principle includes Neste's commitment to respect the human rights of all workers and communities in its supply base.

Neste communicates about the above policies on forced labor in various ways, including making policies available on Neste's public website in various languages, implementing mandatory e-learning on policies for Neste employees, and providing training workshops for contractors, suppliers and sub-suppliers. General governance, including the highest level of accountability for policies, and stakeholder engagement related to policy implementation are described in the [ESRS 2 General disclosures](#) section of this report.

<sup>1)</sup> Neste does not source crude palm oil but uses different palm oil industry residues in the production of renewable fuels.

## Processes

### Ongoing human rights due diligence

Neste conducts ongoing human rights due diligence across its operations and value chains to identify, prevent, mitigate, and, where necessary, remediate risks of forced and child labour. To prioritize its activities, Neste applies a risk-based approach that includes, but is not limited to, value chain mapping, country and sector risk assessments, project-level risk assessments, desk-based research, on-the-ground assessments and sustainability audits, worker voice surveys, and supplier and contractor engagement, pre-screening and self-assessment questionnaires. Due diligence activities are carried out by Neste and/or by credible third party experts on Neste's behalf. Findings are used to inform mitigation actions, strengthen preventive and corrective measures, and monitor effectiveness over time.

Neste's Sustainability organization holds operational responsibility for implementing and tracking human rights due diligence and related stakeholder engagement mechanisms, supported by engagement with expert stakeholders and participation in multi-stakeholder initiatives to address systemic risks and collectively address structural issues within Neste's supply chains.

### Processes for engaging with value chain workers about impacts

Stakeholder engagement, including engagement with workers in the value chain, is a key component of Neste's human rights due diligence. Neste implements stakeholder engagement as an ongoing process of interaction and dialogue with its affected stakeholders in order to hear, understand and respond to their interests and concerns, including through collaborative approaches. Neste takes a proactive approach in identifying affected and potentially affected stakeholders, and the best ways to engage with them or their legitimate representatives,

paying special attention to individuals and groups who may be particularly vulnerable to adverse impacts.

Neste seeks to engage with potentially affected groups early on and before decisions are made, not only when a decision is imminent or a situation is already escalating. Neste seeks to take the perspectives of affected stakeholders into account in its decision-making, and design of prevention, mitigation and remediation actions to address adverse human rights impacts. Neste takes steps to design stakeholder engagement processes that are inclusive, participatory, accessible, transparent, credible, culturally-appropriate, context-specific and gender sensitive. When assessing human rights risks, the company pays special attention to vulnerable groups such as women, children, migrant workers and Indigenous peoples.

Neste engages with value chain workers both directly and through representatives. Examples include:

- **Audiovisual worker voice technology:** Neste has implemented worker voice technology to scale up the number of workers the company engages with in its operations and value chains, and to improve the company's overall understanding of workers' experiences. The technology uses an audiovisual survey to enable direct and anonymous engagement with workers via mobile devices. The surveys are easily accessible for illiterate workers, can be taken in their mother-tongue language, and function even in remote regions without internet access, allowing Neste to engage with even the most vulnerable groups of workers. The technology is used on an ongoing basis throughout the year across Neste's global sourcing regions. The worker voice surveys provide direct insights from value chain workers on a range of topics including but not limited to indicators of forced labor, recruitment fees, children's rights, living wages, inequality, living standards, and issues impacting vulnerable groups

such as young workers, migrant workers, women and workers with disabilities. The insights gathered through these engagements inform the annual human rights saliency assessment, which underpins Neste's human rights policies, and approach to risk mitigation.

- **Sustainability audits:** Neste's sustainability audits cover a range of social criteria and prioritize the assessment of impacts on people, including identifying any signs of forced and child labor. The audits typically include one-on-one interviews with different employee groups, including management, workers with different job profiles, third-party employees and, when possible, union or worker's committee representatives. Sustainability audits are further described in the [G1 Business conduct](#) section.
- **Human rights risk and impact assessments:** Neste conducts targeted human rights risk and impact assessments as needed, based on identified risks, evolving operating contexts, and expansion into new regions or supply chains. These assessments typically include on-the-ground field research and interviews with rights-holders<sup>2)</sup> and/or their legitimate representatives.
- **Engaging with third-party workers on Neste sites:** Neste engages with third-party workers at its refineries through a variety of practices designed to ensure open communication and support. The company prioritizes educating third-party workers on their labor rights during site-entry-permit inductions and social toolbox meetings. These sessions aim to provide a safe space for two-way conversations, allowing workers to voice concerns and discuss social issues directly with Neste representatives. In addition, Neste actively promotes the availability of site-level grievance channels and suggestion boxes, encouraging workers to share feedback and

concerns in a manner that respects their anonymity and safety. Recognizing that migrant workers are a particularly vulnerable group, Neste aims to ensure that key engagement materials are available in the languages most commonly spoken by these workers, for example, site induction pamphlets and posters.

The effectiveness of engagement channels is primarily assessed through direct worker feedback and ongoing monitoring of the number and quality of responses received via different engagement channels.

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

Neste is committed to the remediation of adverse human rights impacts in its business operations and value chains, in accordance with its Human Rights Principle. Neste provides access to appropriate and effective remedy by making efficient grievance mechanisms available to its rights-holders, including at the operational level and site level and seek to ensure that grievances are addressed early and remediated directly.

Where Neste identifies that it has caused or contributed to adverse impacts on the human rights of others, the company provides for or cooperates in the remediation of the adverse impacts through legitimate processes intended to deliver an appropriate and effective remedy. This may include cooperating in good faith in the provision of remedy through state-led mechanisms, such as the OECD national contact points.

Where adverse impacts have occurred that Neste has not caused or contributed to, but which are directly linked to Neste's activities through its business relationships, Neste seeks to use its leverage to prevent or mitigate the risk of the impacts continuing or recurring. This may include supporting the company's business partners

<sup>2)</sup> As defined in Neste's Human Rights Principle, rights-holders are the individuals or social groups whose rights may be impacted by Neste's business activities, operations, products or services. Neste's rights-holders include its own employees, employees of its contractors and service providers, supply chain workers, customers, and the communities who may be affected by Neste and its business partners, including in the supply chain.

in the remediation of those impacts through their own grievance management processes, or support collaboration to provide for non-judicial remediation through third parties.

Neste has established a comprehensive grievance ecosystem. This interconnected network of channels and processes is designed to facilitate the raising, assessment, and resolution of grievances across all its operations and value chains, in accordance with the UN Guiding Principles on Business and Human Rights. A diagram of the grievance ecosystem is publicly available via Neste's Annual Report and website.

Neste takes seriously any allegations that human rights are not properly respected in its business or supply chains, and encourages individuals, communities, business partners or other stakeholders who have reason to believe such activity is taking place to raise their concerns, without fear of retaliation, via Ethics Online. Ethics Online is further described under the [G1 Business conduct](#) section of the report. Ethics Online is available 24/7 and is accessible in multiple languages. Reports can be made anonymously via phone or web service, and can be made by anyone, including value chain workers.

Neste has established procedures for tracking and processing grievances at the group-level, including a cross-functional team that ensures speed and consistency in managing grievance cases and assessing the effectiveness of its actions. The company publicly discloses and tracks the number and type of grievances that have been raised in person or via Ethics Online.

Neste has also established permanent site-level complaints channels at its refineries to address concerns of contracted and subcontracted workers, including migrant workers. These channels, accessible via both suggestion boxes and QR codes on posters discreetly placed around the sites, enable workers to submit anonymous complaints directly to Neste. The posters inform workers of their rights in various languages and use illustrations and simple terminology to encourage them to report situations in which they may be experiencing exploitation. The complaints are received and managed by local committees, who implement remediative actions and assess the effectiveness of these actions

on an ongoing basis. Workers also have the option to report concerns directly to supervisors, or to use Neste's company-wide Ethics Online whistleblowing channel. All channels guarantee confidentiality and protection from retaliation.

Neste maintains a publicly available log of sustainability-related concerns and complaints raised in its renewable raw materials supply chains on its website. This grievance log is updated on a monthly basis to include new grievances, provide status updates on the remediation of existing grievances, and track the effectiveness of the remedial actions taken. Reports documented in the grievance log may involve cases of forced labor or severe human rights issues. Descriptions of the nature of such cases are provided within the log. The log also encompasses cases of actual or suspected non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises that involve value chain workers. Descriptions of the nature of such cases are provided within the log.

Neste encourages its suppliers to put in place appropriate complaints channels and grievance mechanisms that workers can use to report actual or suspected cases of human rights violations, and have transparent processes for receiving and following up on reports. This is outlined in the Supplier Code of Conduct Guide for Suppliers and included as a regular topic in Neste-led capacity building sessions for its renewable raw materials suppliers. Neste uses worker voice technology and in-person interviews conducted during sustainability audits to assess whether value chain workers are aware of and trust the grievance channels in their workplace as a way to raise their concerns and have them addressed. Neste believes that close engagement and collaboration with contractors on its sites and raw material suppliers provides it the best opportunities to advance human rights and proactively mitigate forced and child labor risks within company supply chains. Neste therefore engages regularly in capacity building with its suppliers and contractors.

Neste reports annually on the percentage of human rights and labor violations identified through its sustainability audits, and the percentage and type of complaints reported via its site-level We Care Channels. Certain cases may be further detailed in Neste's annual Modern Slavery Statement to provide additional context and transparency.

Neste addresses adverse sustainability impacts once the company becomes aware of them, including any adverse human rights impacts, as further detailed under the description of Neste's remediation process below, a key part of its due diligence process. Remediation takes place in cases where adverse impacts are identified. The company's primary means of action is engagement and cooperation with its suppliers and contractors to remedy issues. This is because Neste seeks to prioritize the wellbeing of those whose rights have been harmed, and ending purchases does not resolve problems or provide access to remedy for affected rights holders. Remediation activities include:

- Conducting a thorough and impartial investigation and depending on the severity of the impact, selecting the course of action (e.g., supplier engagement, audits by the company's own local sustainability specialists or a third-party auditor).
- Implementing immediate actions to address any urgent or critical issues identified during the investigation.
- Requiring a detailed plan with a timeline for corrective actions from the supplier.
- Cooperating with the supplier and other stakeholders to help develop their operations, practices and processes, perform necessary corrective actions, and monitor the outcomes.
- Monitoring and reporting on the progress online via Neste's log of renewable raw material supply chain grievances.
- Ending purchases if Neste does not see adequate progress or if the supplier loses relevant certifications.
- Reviewing, improving and adjusting the company's processes where needed.

## Targets

As part of its sustainability vision, Neste aims to ensure that people across its value chain can work with dignity, guided by 2030 goals on responsible recruitment, living wages, children’s rights, and reducing inequality. Neste is committed to implement and sustain comprehensive sustainability due diligence across its own operations and supply chains in line with Corporate Sustainability Due Diligence Directive requirements. Neste does not have a separate measurable, time-bound target related to human rights-related issues in the value chain but does track the effectiveness of its policies and actions with e.g., an entity-specific Key Performance Indicator (KPI) of Human Rights Due Diligence carried out for key business areas/functions. The scope of the KPI is focused on Neste’s upstream and own activities. The KPI has not been validated by an external third party.

## Actions and resources

### Actions

The adjacent table outlines key actions undertaken during the reporting year to identify, assess, and address human rights risks, including forced and child labor,

Key performance indicator	Performance in 2025	Performance in 2024
Human Rights Due Diligence carried out for key business areas/functions (amount and description) <sup>1)</sup>	<p>Four major assessments/initiatives undertaken in 2025:</p> <ul style="list-style-type: none"> <li>• Corporate-wide assessment to review Neste’s salient human rights issues and mitigation actions.</li> <li>• Collaboration with third-party experts to conduct three on-the-ground human rights risk assessments, focused on salient issues in Neste’s high risk supply chains.</li> <li>• Human rights due diligence maturity assessments completed for Neste’s offices, owned pre-treatment facilities, and ground transportation.</li> <li>• Living wage gap assessments completed for Neste’s own employees globally.</li> </ul>	<p>Four major assessments/initiatives undertaken in 2024:</p> <ul style="list-style-type: none"> <li>• Corporate-wide assessment to review Neste’s salient issues and mitigation actions.</li> <li>• Human rights impact &amp; risk assessment completed for the potential construction and operation of a new unit at Porvoo refinery.</li> <li>• Human rights due diligence assessments completed for Neste-owned terminals in Finland, Rotterdam and Baltics.</li> <li>• Living wage gap assessments completed for Neste’s own employees globally.</li> </ul>

<sup>1)</sup> See description of Human Rights Due Diligence process under ‘Processes’.

across Neste’s value chain. These represent selected examples of Neste’s human rights due diligence activities and do not cover all actions taken. Additional measures are described in the processes and targets sections above, which outline Neste’s ongoing human rights due diligence, including risk identification and assessment, supplier engagement and monitoring, rights-holder engagement, capacity-building and grievance management. Further information on supplier and contractor pre-screening and continuous monitoring processes is provided in the [G1 Business conduct](#) section.

### Expected outcomes

Through these actions, Neste aims to ensure respect for human rights and mitigate the risk of forced labor across the value chain. In addition, these actions support improving social and environmental conditions in the supply chain and enhance supplier sustainability performance over the short and medium term. The actions are also relevant in ensuring compliance with the Supplier Code of Conduct requirements for environment, social, business conduct, safety and human rights issues.

The progress in these actions is monitored e.g., by the human rights due diligence KPI presented above.

### Resources to implement actions

Implementation of the actions reported above did not require significant (> 50 MEUR) financial resources during the reporting year, and is not expected to require such resources in the future.

Action area	Description	Actions in 2025	Planned actions
<b>Human rights saliency assessment</b>	Annual saliency assessment to evaluate actual and potential human rights impacts along the value chain, based on severity and likelihood. As part of the assessment, Neste also evaluates the effectiveness of current prevention and mitigation actions.	Saliency assessment reviewed and updated in 2025, based on information gathered through discussions with internal and external experts, findings from sustainability audits, third-party human rights and labor assessments in Neste’s supply chains, topics raised through Neste’s grievance channels, and other ongoing human rights due diligence activities.	Continued annual review and update of Neste’s human rights saliency assessment.
<b>Human rights risk and impact assessment</b>	Targeted human rights risk and impact assessments conducted to deepen Neste’s understanding of specific human rights risks in selected operations, sourcing regions or supply chains. Findings inform preventative and corrective actions, and strengthen ongoing due diligence and mitigation efforts.	<p>Collaboration with third-party experts to conduct three on-the-ground human rights risk assessments in high-risk supply chains, focusing on salient issues and engagement with workers, suppliers, and local communities. Following the assessments, third-party experts facilitated a workshop to provide capacity building, recommendations, and action planning for Neste teams.</p> <p>In 2025, Neste collaborated with its supplier Golden Agri-Resources (GAR) and independent experts to assess human rights risks at third-party mills in Riau, Indonesia, beyond Neste’s first tier of sourcing. The assessments covered maturity of mill policies and practices on various issues including forced labor, child labor and fair recruitment, and were followed by capacity-building sessions with mill management to strengthen due diligence and implement corrective actions.</p>	Continued human rights risk and impact assessments conducted as needed, based on identified risks, evolving operating contexts, and expansion into new regions or supply chains. Integration of findings from assessments into ongoing Neste risk-based due diligence and prevention and mitigation actions.

# Governance information

## G1 Business conduct and compliance

### Material impacts, risks and opportunities

Neste has identified the following material impacts and risks with regards to the company's business conduct:

Compliance		
<b>Positive impact</b>	Across the value chain	Neste's commitment to ethical business practices has a positive impact on stakeholders of the company. Neste's Code of Conduct sets the framework for the company's global business operations and establishes the ethical practices to guide every Neste employee in their day-to-day business tasks and in interactions with customers, suppliers, other business partners and stakeholders. The impact applies across short- to long-term time horizons.
<b>Risk</b>	Across the value chain	Unethical behavior or breaches of Neste's Code of Conduct, or applicable legislation or regulations can lead to adverse legal, financial and/or reputational consequences for Neste. The risk applies across short- to long-term time horizons.
Management of relationships with suppliers		
<b>Positive impact</b>	Upstream	As stated in Neste's Code of Conduct and Sustainability Policy, Neste is committed to following the guidance by the UN Guiding Principles on Business and Human Rights (UNGPs) and OECD Guidelines for Multinational Enterprises in its sourcing activities. Through these commitments, Neste drives e.g., improved working conditions, ethical business practices and safety in its supply chain. This impact applies across short- to long-term time horizons and is particularly relevant to Neste's renewable and recycled raw material sourcing.

Neste's commitment to ethical business conduct is an integral part of the company's long-term value creation and maintaining its license to operate. This is especially relevant considering Neste's operating sector and its global supply chains.

As part of its sustainability vision, Neste aims to drive a safe and healthy workplace, fair labor practices and increased commitment to sustainability across the supply chain. Neste's commitments to business conduct depend not only on its own people but also on selecting business partners who share the company's commitments. In addition to the material positive impact identified related to the management of relationships with suppliers, relevant impacts, risks and opportunities in Neste's upstream value chain are also disclosed in for example, [E4 Biodiversity and ecosystems](#), [E5 Resource use and circular economy](#) and [S2 Workers in the value chain](#).

### Compliance

#### Policies

Neste's **Code of Conduct** sets the framework for the company's global business operations. The Code of Conduct is approved by the Board and applies to the entire Neste Group. It contains the company's main principles and key requirements for all Neste employees to comply with in their daily work, as well as in interactions with customers, suppliers and other business partners and stakeholders. It also contains references to more detailed requirements and guidance in other governing documents. Neste management is responsible for ensuring the implementation of the Code of Conduct, supported by Neste's Compliance Function.

The Code of Conduct references several international frameworks. In line with the United Nations Guiding Principles on Business and Human Rights, Neste respects internationally recognized human and labor rights as laid out in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on

Fundamental Principles and Rights at Work. Neste is also committed to upholding and implementing the ten principles of the UN Global Compact, to which the company is a signatory. The Code of Conduct is publicly available for Neste's stakeholders. Raising awareness of and training in the Code of Conduct and its topics are central elements of the Neste compliance program. Neste regularly communicates internally on compliance-related topics and trains its employees through both e-learning courses and in-person training. Selected compliance topics are trained annually based on a yearly action plan. The Code of Conduct e-learning is part of the new employee onboarding and is also regularly updated and assigned to the organization, most recently in 2025. All members of Neste Board of Directors have also completed the Code of Conduct e-learning.

The Compliance Function, headed by the Chief Compliance Officer, regularly reports on compliance activities to the Neste Leadership Team and the Audit Committee. Neste also has an Ethics and Compliance Committee, which oversees and steers the management of the

ethics and compliance program in Neste. Compliance topics and risks are also regularly reported and managed on a Business area and Function level.

As stated in the company's Code of Conduct, Neste has zero tolerance of corruption and bribery of any kind in connection with Neste's operations, whether committed by Neste employees or third parties acting on behalf of Neste. Neste's **Anti-Corruption Principle** sets the rules for preventing corruption in connection with Neste's business operations and provides more detailed guidance on responsible business practices. The Principle applies to all Neste employees and to anyone working for or representing any business entity within the Neste Group. The principle is consistent with the United Nations Convention against Corruption. The Anti-Corruption Principle and related guidance is internally available in Neste's global intranet and further communicated and trained via an anti-corruption e-learning assigned to all office workers, targeted trainings and via regular newsletters. Neste management is responsible for ensuring the implementation of the Anti-Corruption

Principle, supported by Neste's Compliance Function.

Risks of corruption and bribery are typically treated as inherent risks in the oil and gas sector due to its global nature, contractual relationships with local governments, and involvement in complex networks with various suppliers and contractors. As a preventive measure, Neste has developed a compliance program which includes policy statements (Code of Conduct, Anti-Corruption Principle), dedicated e-learning packages, an annual compliance acknowledgment, regular communication and Ethics Online for the reporting of suspected misconduct. Neste's counterparties are required to comply with the Supplier Code of Conduct and/or their own equivalent principles and undergo a compliance clearance and counterparty risk assessment. As stated in the Code of Conduct, Neste has processes in place to carry out due diligence on its business partners. The compliance clearance and counterparty risk assessment covers the following risks: trade sanctions; politically exposed persons; money laundering; corruption and bribery.

Employees are encouraged and required to report their concerns, or observed or suspected violations of Neste's Code of Conduct or Anti-Corruption Principle to their own manager, Neste's HR, and the Compliance or Internal Audit functions. The Code of Conduct e-learning course includes guidelines on how to report observed or suspected violations of Neste's Code of Conduct, other Neste policies or principles or applicable legislation or

regulations. In addition to other reporting channels, Neste has an externally operated misconduct reporting system, Ethics Online, available to all Neste's internal and external stakeholders, including various actors in its supply chains. Ethics Online serves as a grievance mechanism and enables Neste's stakeholders to anonymously raise concerns related to alleged misconduct in Neste's operations. The Ethics Online can be used by phone or via the website. To assess the effectiveness of Neste's reporting channels, the number of reports submitted through the channels is followed regularly. Neste may seek feedback from its employees on the channels, for example, through employee engagement surveys.

Neste's Investigation Group is responsible for evaluating and investigating reported cases in a professional, objective, confidential and prompt manner. The Investigation Group will decide on the investigation lead and approach to investigate depending on the nature of the reported allegation and/or concern. All investigations shall be impartial, unbiased and based on fact finding and managed by appropriate resources. Upon need and depending on the nature of the investigation, Neste Investigation Group regularly retains independent external forensic and/or legal expertise to conduct the investigation. Misconduct investigations and their outcome are regularly reported to Neste's Ethics and Compliance Committee and to the Audit Committee.

### Key performance indicator

Code of Conduct e-learning completion rate

### Performance in 2025

By the end of the reporting year, 99% of all active employees completed the Code of Conduct e-learning revision in 2025

Neste has a strict non-retaliation policy for concerns reported in good faith. Neste's main principles and process followed in internal misconduct investigations is described in the Company's internal Misconduct Investigation Standard. The Standard is aligned with the Directive (EU) on the protection of persons who report breaches of Union law (2019/1937).

General governance, including the highest level of accountability for policies, and stakeholder engagement related to policy implementation are described in the [ESRS 2 General disclosures](#) section of this report.

### Targets

Neste does not have a separate measurable, time-bound target related to compliance, but does track the effectiveness of its policies and actions via certain indicators. As a key performance indicator, Neste tracks the percentage of active employees who have completed the Code of Conduct e-learning updated and assigned to the organization in 2025. Neste's ambition is that all active employees complete this training by the end of the reporting year. Neste has not defined a separate base year for the key performance indicator.

### Actions

Neste's compliance program is implemented via awareness raising of and training in the Code of Conduct and its topics. Neste regularly communicates internally on compliance-related topics and trains its employees through diverse training activities. Selected compliance topics are trained annually based on a yearly action plan. Compliance risk assessments are carried out annually to support the risk-based approach and to guide the compliance efforts, risk prevention and mitigation actions in the organization.

Action area	Description	Actions in 2025	Planned actions
<b>Implementation and development of Neste's compliance program</b>	<p>Neste's compliance policies, principles and standards are updated regularly and form the basis of Neste's compliance program. They are implemented through communication and training. As part of this, Neste regularly communicates internally on compliance-related topics and trains employees through both e-learning courses and targeted in-person and virtual training. The target groups for the trainings are based on role and risk level.</p> <p>Neste constantly develops its compliance program with special efforts in the defined key focus areas: competition law compliance; anti-corruption; trade sanctions; privacy and anti-money laundering.</p>	<p>As part of the continuous training efforts, two e-learning courses were revised and assigned in 2025:</p> <ul style="list-style-type: none"> <li>Trade Sanctions e-learning for a defined group of approximately 2,500 employees with a completion rate of 99%;</li> <li>Code of Conduct e-learning for approximately 4,800 employees.</li> </ul> <p>To enhance awareness, Neste organized in 2025 its first ever Compliance days awareness campaign, focusing on the Code of Conduct, anti-corruption, privacy and competition compliance.</p> <p>In addition, regular compliance communication was shared via various channels, including Compliance Hub channel and global intranet. In 2025, this communication covered topics such as privacy, trade sanctions, Code of Conduct and gifts and hospitality rules.</p>	Neste plans to continue compliance program implementation and development actions similarly in the future.

### Expected outcomes

Neste’s compliance program implementation and development actions aim at raising awareness on compliance topics and requirements among Neste’s personnel and making sure all employees act in accordance with applicable legislations, regulations and Neste’s compliance policies and principles in order to prevent compliance breaches or misconducts.

### Resources to implement actions

Implementation of these actions did not require significant (> 50 MEUR) financial resources during the reporting year, and is not expected to require such resources in the future.

## Metrics

	2025	2024
<b>Number of suspected misconducts reported in person or via the whistleblowing system to the Investigation Group</b>	Number of suspected misconducts reported in person or via the available reporting channels including Ethics Online to the Investigation Group was in total 25 (2 reports concerning same issue) of which employment matters 6 reports, conflict of interest 3, inappropriate behavior 1, supplier/business partner misconduct/unethical behavior 4, discrimination and harassment 4, misuse of sensitive information 4, fraud 1, bribery, corruption, facilitation payment 2. Misconduct by Neste employees confirmed in 4 cases, related to conflict of interest, misuse of sensitive information, breach of internal rules, or inappropriate behavior. All leading to further actions and/or process improvements. 1 investigation is pending. The confirmed cases of employee misconduct were not related to corruption, bribery or facilitation payments. Renewable raw material Supply chain related external grievances are reported separately by the Sustainability team on Neste's website.	Number of suspected misconducts reported in person or via the available reporting channels including Ethics Online to the Investigation Group was in total 57 (numerous reports concerning same issue) of which employment matters 21 reports, health & safety 7, conflict of interest 7, inappropriate behavior 5, supplier/business partner misconduct/unethical behavior 5, discrimination and harassment 3, misuse of sensitive information 3, other 2, fraud 1, unethical conduct towards clients/suppliers/ business contacts 1, theft, asset misuse, embezzlement 1, bribery, corruption, facilitation payment 1. Misconduct by Neste employees confirmed in 9 cases, related to conflict of interest, attempted fraud, misuse of sensitive information, breach of internal rules, leadership behaviour and/or inappropriate behavior. All leading to further actions and/or process improvements. 1 investigation is pending. The confirmed cases of misconduct were not related to corruption, bribery or facilitation payments. Renewable raw material Supply chain related external grievances are reported separately by the Sustainability team on Neste's website.

## Management of relationships with suppliers

### Policies

Neste requires all its suppliers and other business partners to comply with applicable laws and expects them to follow equivalent ethical business standards as stated in the Code of Conduct, further described in Neste’s **Supplier Code of Conduct**. The Supplier Code of Conduct outlines the basic requirements Neste expects its suppliers and their first tier suppliers, contractors and business partners to adhere to and implement throughout their

businesses. Neste aims to include the Supplier Code of Conduct in the contract terms for suppliers, contractors and other business partners participating in the supply of raw materials, products, components, materials or services to Neste. Companies consolidated through mergers and acquisitions are also expected to implement Neste’s Supplier Code of Conduct in their sourcing. The Supplier Code of Conduct includes requirements on compliance with laws and regulations, business conduct, human and labor rights, occupational health, safety and security and environmental impact and climate change. It references the Universal Declaration of Human Rights

and the fundamental rights in the eight core conventions of the International Labor Organization.

The Supplier Code of Conduct is publicly available on Neste’s webpages in several languages. Neste carries out training and provides a guide with practical recommendations to support the implementation and help its suppliers meet their obligations to comply with the Supplier Code of Conduct.

Additionally Neste requires all its renewable raw material suppliers to comply with Neste’s **Responsible Sourcing Principle**. The requirements of the Responsible Sourcing Principle are described more in detail in the

**E5 Resource Use** section. The Supplier Code of Conduct and related principles are a key tool for enhancing the positive impact Neste aims to achieve throughout its value chain.

General governance, including the highest level of accountability for policies, and stakeholder engagement related to policy implementation are described in the **ESRS 2 General disclosures** section of this report.

## Targets

Neste is committed to implement and sustain comprehensive sustainability due diligence across Neste's own operations and supply chains in line with Corporate Sustainability Due Diligence Directive (CSDDD) requirements. Specific targets in line with the European Sustainability Reporting Standard and the CSDDD requirements may be developed where relevant.

Neste's sustainability due diligence process is a key element in addressing material impacts and implementing its policy commitments related to the management of relationships with suppliers. Neste's sustainability due diligence process covers renewable, recycled and fossil raw material suppliers, and includes country risk assessment, supplier due diligence and audits, supplier engagement and grievance investigations.

As a key performance indicator, Neste tracks percentages of business partners who have committed to Neste's minimum sustainability requirements covered in the Supplier Code of Conduct or equivalent as detailed in the adjacent table. Neste expects all its suppliers and other business partners to comply with applicable laws and to follow equivalent ethical business standards as stated in the Code of Conduct, further described in the Supplier Code of Conduct. Neste has not defined a separate base year for the key performance indicator.

## Actions

Key actions related to the management of relationships with suppliers are described below:

**Risk assessment in supply chains:** A key element in understanding the sustainability risks in the company's supply chains is assessing country risks. Neste

uses a bespoke, industry-leading country risk assessment methodology from Verisk Maplecroft to identify high sustainability risk countries or geographical areas in which it operates and has raw material supply chains. The country risk assessment allows Neste to effectively prioritize its activities by identifying the most significant sustainability risks in certain countries or geographical areas.

**Conducting sustainability due diligence:** Assessing sustainability risks in the company's supply chains begins before agreements have been signed or raw materials, products, components, materials or services are delivered. To ensure its suppliers' compliance with the Supplier Code of Conduct, Neste performs systematic controls for counterparty screening and monitoring, during which potential business partners undergo automated screening. Counterparties are screened for economic sanctions and similar compliance issues and selected ethical concern categories in third-party enforcement databases and major news outlet sources. All Neste's raw material suppliers and selected contractors are subject to additional sustainability due diligence. Neste uses a risk based approach to determine the type of assessment, which can include desktop reviews, the mapping of supply chains and operations, supplier engagement and sustainability audits. The risk-based approach uses country risk as one element of the risk assessment. Knowing the origin of raw materials is a fundamental supplier requirement. Where possible, the aim is to gain visibility throughout the raw material supply chain, including Neste's suppliers' suppliers.

**Renewable raw materials sourcing:** Neste requires all its renewable raw material suppliers to comply with

the Supplier Code of Conduct and Responsible Sourcing Principle. All Neste's renewable raw material suppliers are also subject to sustainability due diligence, as stated in Neste's Supplier Sustainability Approval Principle. The principle applies globally to any Neste company establishing a business relationship with a supplier of renewable raw materials. It sets the minimum sustainability requirements for approving suppliers through a five-step process, including raw material evaluation, risk assessments, counterparty screening, a sustainability review and audits. The Principle is available internally.

Neste verifies suppliers' compliance with Neste's Supplier Code of Conduct with the sustainability review, encompassing a range of topics such as governance, labor standards and practices, human rights, the environment, health and safety. The company continues commercial negotiations only with approved parties that meet its sustainability requirements. The validity period of the sustainability approval for a supplier is three or five years, depending on, e.g., country risk, raw material volumes supplied to Neste and the outcome of the sustainability review. Once the validity period expires, the supplier undergoes a new review.

**Liquefied waste plastics sourcing:** Neste requires its liquefied waste plastic suppliers to fulfill the requirements in the Supplier Code of Conduct and only accepts liquefied waste plastic that is traceable and complies with the ISCC Plus certification requirements. Suppliers with whom Neste has an established and ongoing business relationship are subject to sustainability due diligence.

**Crude oil and other fossil raw material sourcing:** The due diligence process for the company's crude oil and other fossil raw material suppliers includes a country risk assessment and a counterparty screening. Neste also conducts a sustainability review of all new suppliers based on publicly available information regarding topics outlined in the Supplier Code of Conduct, suppliers' climate and environmental commitments, and crude oil production-specific issues such as flaring and spills. The sustainability review is renewed for fossil raw material suppliers every three years.

**Indirect procurement:** Neste's indirect procurement activities include the sourcing, purchasing as well as contract and supplier management of goods and services that are not included in the sourcing and delivery of crude oil and other fossil raw materials or renewable and recycled raw materials. In addition to the automated counterparty compliance screening, Neste has carried out category and supplier specific risk assessments to enhance its understanding of the sustainability risk in Neste's indirect procurement supply chains. Neste has completed Sedex self-assessment questionnaires for its refineries in Porvoo, Rotterdam and Singapore, allowing the company to thoroughly assess gaps in its management systems and human rights due diligence. See [S2 Workers in the value chain](#) section for a more detailed description of Neste's processes for engaging with value chain workers about impacts.

**Sustainability audits:** Neste carries out audits to mitigate sustainability risks in its supply chains. When selecting suppliers to be audited, special attention is paid to suppliers, raw materials or countries with the highest sustainability risks. The sustainability audits are conducted either by Neste's own local sustainability specialists or a third-party auditor. Where possible, the company also conducts audits on its suppliers' suppliers (second-tier suppliers or even beyond). After the audit, Neste follows up cases of non-compliance and requires its suppliers to remediate significant open issues within a specified timeframe. The main purpose of Neste's sustainability audits is to verify that its suppliers comply with Neste's Supplier Code of Conduct and local regulatory requirements. Neste's Sustainability Audit Standard sets out the overall requirements for sustainability audits at Neste, which include a social scope, and is regularly benchmarked against globally recognized methodologies such as SMETA and SA8000.

**Capacity building:** Neste understands that due diligence processes and sustainability audits alone are insufficient for a positive impact in its value chain. The company therefore engages regularly in capacity building

Key performance indicator	Performance in 2025	Performance in 2024
Business partners who have committed to Neste's minimum sustainability requirements covered in the Supplier Code of Conduct or equivalent <sup>1)</sup>	100% of the renewable and recycled raw material volumes 93% of crude oil and fossil raw material volumes 92% overall indirect contracted spend	100% of the renewable and recycled raw material volumes 81% of crude oil and fossil raw material volumes 91% overall indirect contracted spend

<sup>1)</sup> After the assessment of the supplier's or business partner's own policies and principles, Neste may agree that compliance with their own code of conduct is sufficient for the purpose of complying with Neste's Supplier Code of Conduct.

with its suppliers. Neste regularly organizes training sessions and workshops on topics such as the Supplier Code of Conduct requirements, sustainability policy development, due diligence, traceability and grievance management. The company is also committed to training its employees on its policies. To support implementation across its business, Neste provides an e-learning to train relevant Neste employees on the Supplier Code

of Conduct requirements, while also providing live training sessions for selected Neste teams, led by the company's human rights and sustainability specialists.

**Grievances and concerns in the supply chain:** Neste investigates all complaints and allegations of suspected sustainability violations. This includes any suspected breaches of the Supplier Code of Conduct or the Responsible Sourcing Principle. Engagement and

cooperation with the company's suppliers and contractors are its primary ways of addressing any grievances and concerns. Ending purchases does not necessarily solve the problem, while by working with the suppliers, Neste can work for improvements. If the sustainability criteria or contractual requirements included in contracts have been verifiably breached, their nature is considered serious, and progress to resolve those issues

is not made in a reasonable time, Neste will terminate its contract with the supplier or contractor in question. See [S2 Workers in the value chain](#) section for a more detailed description of Neste's processes to remedy negative impacts and ensure grievance mechanisms are available for value chain workers to raise concerns.

Action area	Description	Actions in 2025	Planned actions
<b>Risk assessment in supply chains</b>	Neste maintains an up-to-date country risk categorization based on country risk indices such as ethical business practices, human and labor rights, health and safety, and the environment. The categorization also includes a list of no-go countries and regions based on regulatory and risk considerations such as trade sanctions.	As part of the annual review, Neste updated its country risk categorization. Furthermore, the company enhanced its risk-based approach to sustainability due diligence, aligning it with strategic priorities and ensuring that focused actions target highest-risk suppliers and countries.	Neste plans to strengthen its risk-based approach across the company to focus on most salient sustainability risks.
<b>Conducting sustainability due diligence</b>	All Neste's raw material suppliers are subject to additional sustainability due diligence.	<p>New renewable raw material suppliers that were evaluated using sustainability criteria: 100%</p> <p>New recycled raw material suppliers that were evaluated using sustainability criteria: 83%</p> <p>New fossil raw material suppliers that were evaluated using sustainability criteria: 100%</p> <p>Number of sustainability audits conducted: 36</p>	<p>Neste will continue developing its supplier due diligence in accordance with upcoming regulations, such as the Corporate Sustainability Due Diligence Directive.</p> <p>The company also plans to further integrate sustainability into indirect procurement activities and continue to work proactively to promote respect for labor rights across its production sites.</p>
<b>Supplier engagement</b>	Engagement and cooperation with Neste's suppliers is the company's primary way to drive a positive impact in its supply chain.	<p>In 2025, key actions included targeted supplier training on the Neste Supplier Code of Conduct and proactive measures for mitigating deforestation risks.</p> <p>Furthermore, Neste collaborated with third-party experts to conduct three focused risk assessments covering the most salient human rights issues in its high risk supply chains, with more information available in <a href="#">S2 Workers in the value chain</a>.</p> <p>Neste, a founding member of the Siak Pelalawan Landscape Programme, continues to invest in the programme's second phase to support sustainable palm oil production in Riau, Indonesia.</p>	Neste will continue supplier engagement based on a risk-based approach.
<b>Grievances and concerns in the supply chain</b>	Neste monitors grievances or shortcomings in its supply chains through concerns raised by stakeholders, regular audits and assessments, laboratory tests, engagement with its suppliers as well as through its third party partners.	Neste updates its raw material grievance log on the company's webpage monthly to include new grievances as well as provide status updates on the remediation of existing grievances. Further information on Neste's remediation process is provided in <a href="#">S2 Workers in the value chain</a> .	Neste continues to take seriously and investigate all complaints and allegations of suspected sustainability violations. This includes any suspected breaches of the Supplier Code of Conduct or Responsible Sourcing Principle.

### Expected outcomes

Through these actions, Neste aims to improve social and environmental conditions in the supply chain and enhance supplier sustainability performance over the short and medium term. The actions support compliance with the Supplier Code of Conduct requirements for environment, social, business conduct, safety and human rights topics. The progress in these actions is monitored by the Supplier Code of Conduct KPI presented above.

### Resources to implement actions

Implementation of the actions reported above did not require significant (> 50 MEUR) financial resources during the reporting year, and is not expected to require such resources in the future.

### Reporting principles

**Code of Conduct e-learning completion rate** (entity-specific metric): Completion rate of the Code of Conduct e-learning revised in 2025 is reported as the share (%) of active employees who have completed the e-learning by the end of the reporting year.

The completion rate of the e-learning disclosed under Compliance Actions is calculated based on the number of employees who have been assigned the training. As the topic of the e-learning varies annually, comparative information for the completion rate is not provided.

**Number of suspected misconducts** (entity-specific metric): Neste reports the number of suspected misconducts reported in person or via the available reporting channels including Ethics Online to the Investigation Group. Neste's process for reporting and handling grievances is described more in detail under the Compliance Policies section.

**Supplier Code of Conduct coverage** (entity-specific metric): The share of renewable and recycled raw material volumes and crude oil and fossil raw materials volumes covered by Neste's Supplier Code of Conduct or equivalent is calculated based on the volumes delivered to Neste during the reporting year. The share of the Supplier Code of Conduct coverage for indirect procurement is calculated based on spend.

**New renewable, recycled or fossil raw materials suppliers that were evaluated using sustainability criteria** (entity-specific metric) is calculated based on the number of new raw material suppliers that were approved or declined during the reporting year. The sustainability criteria used in the evaluation is described in the Actions related to Supplier relationship management. As the definitions of the metrics have changed compared to previous reporting years, comparative information is not presented.

**The number of sustainability audits** (entity-specific metric) includes audits of renewable and recycled raw material suppliers, terminal audits, and contractor audits, where conducted during the reporting year.

An external third party has not validated the KPIs and metrics described above.

## Appendixes

### Statement on due diligence

<b>Core elements of due diligence</b>	<b>Sections in the Sustainability statement</b>	<b>Page</b>
<b>a) Embedding due diligence in governance, strategy and business model</b>	S2 Workers in the value chain	130–131
	G1 Business conduct	134–139
<b>b) Engaging with affected stakeholders in all key steps of the due diligence</b>	ESRS 2 General disclosures	94–95
	S1 Own workforce	124
	S2 Workers in the value chain	131
<b>c) Identifying and assessing adverse impacts</b>	ESRS 2 General disclosures	92–93
	S1 Own workforce	123–125
	S2 Workers in the value chain	130–131, 133
	G1 Business conduct	137–139
<b>d) Taking actions to address those adverse impacts</b>	S1 Own workforce	124–126
	S2 Workers in the value chain	131–133
<b>e) Tracking the effectiveness of these efforts and communicating</b>	S1 Own workforce	124–126
	S2 Workers in the value chain	131–133

## Disclosure Requirements in ESRS covered by Neste's Sustainability statement

The following table lists all ESRS disclosure requirements in ESRS 2 and the seven topical standards which are material to Neste and included in the Sustainability statement. Neste omits all disclosures related to topical standards E3 Water and marine resources, S3 Affected communities and S4 Consumers and end-users, as

these have not been deemed material in the double materiality assessment. Relevant disclosure requirements have been identified by linking material impacts, risks and opportunities, and their related sub-topics or sub-sub topics, to the relevant ESRS. Additional entity-specific disclosures have been defined based on implemented targets and for the entity-specific topic carbon handprint.

<b>ESRS 2 General disclosures</b>	
<b>Disclosure requirement</b>	<b>Page</b>
BP-1 General basis for preparation of sustainability statements	87
BP-2 Disclosures in relation to specific circumstances	87, 112–113, 116
GOV-1 The role of the administrative, management and supervisory bodies	87–88
GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	88
GOV-3 Integration of sustainability-related performance in incentive schemes	88
GOV-4 Statement on due diligence	140
GOV-5 Risk management and internal controls over sustainability reporting	88–89
SBM-1 Strategy, business model and value chain	89–90
SBM-2 Interests and views of stakeholders	94–95
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	90–92
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	92–93
IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement	141–145

<b>ESRS E1 Climate change</b>	
<b>Disclosure requirement</b>	<b>Page</b>
ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes	88
E1-1 Transition plan for climate change mitigation	89–90, 104, 106–109
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model(s)	90–91, 103–105
ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	92–93, 104–105
E1-2 Policies related to climate change mitigation and adaptation	96, 105–106
E1-3 Actions and resources in relation to climate change policies	108–109
E1-4 Targets related to climate change mitigation and adaptation	106–107
E1-5 Energy consumption and mix	110, 112
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	111–113
E1-8 Internal carbon pricing	109
<b>ESRS E2 Pollution</b>	
<b>Disclosure requirement</b>	<b>Page</b>
ESRS 2 IRO-1 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	92–93, 114
E2-1 Policies related to pollution	96, 114–115
E2-2 Actions and resources related to pollution	115
E2-3 Targets related to pollution	115
E2-5 Substances of concern and substances of very high concern	116
<b>ESRS E4 Biodiversity and ecosystems</b>	
<b>Disclosure requirement</b>	<b>Page</b>
E4-1 Transition plan on biodiversity and ecosystems	117–118
ESRS SBM 3 Material impacts, risks and opportunities and their interaction with strategy and business model	90–91, 117
ESRS 2 IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	92–93, 117–118
E4-2 Policies related to biodiversity and ecosystems	96, 118
E4-3 Actions and resources related to biodiversity and ecosystems	119
E4-4 Targets related to biodiversity and ecosystems	118
E4-5 Impact metrics related to biodiversity and ecosystems change	119

<b>ESRS E5 Resource use and circular economy</b>	
<b>Disclosure requirement</b>	<b>Page</b>
ESRS 2 IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	92–93
E5-1 Policies related to resource use and circular economy	96, 120
E5-2 Actions and resources related to resource use and circular economy	121
E5-3 Targets related to resource use and circular economy	121
E5-4 Resource inflows	122
<b>ESRS S1 Own workforce</b>	
<b>Disclosure requirement</b>	<b>Page</b>
ESRS 2 SBM-2 Interest and views of stakeholders	94–95
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	90–92, 123
S1-1 Policies related to own workforce	96, 123–124
S1-2 Processes for engaging with own workers and workers' representatives about impacts	124
S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns	125, 134–135
S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	126
S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	125
S1-6 Characteristics of Neste's employees	127, 129
S1-8 Collective bargaining coverage and social dialogue	127, 129
S1-9 Diversity metrics	128, 129
S1-10 Adequate wages	128
S1-11 Social protection	128
S1-14 Health and safety indicators	128, 129
S1-17 Incidents, complaints and severe human rights impacts	128, 129

<b>ESRS S2 Workers in the value chain</b>	
<b>Disclosure requirement</b>	<b>Page</b>
ESRS 2 SBM-2 Interest and views of stakeholders	94–95
ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	90–92, 130
S2-1 Policies related to value chain workers	96, 130
S2-2 Processes for engaging with value chain workers about impacts	131
S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns	131–132
S2-4 Taking action on material impacts on value chain workers, and approaches to mitigating material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	133
S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	133
<b>ESRS G1 Business conduct</b>	
<b>Disclosure requirement</b>	<b>Page</b>
ESRS 2 GOV-1 The role of the administrative, supervisory and management bodies	87–88
ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	92–93
G1-1 Corporate culture and business conduct policies	96, 134–135
G1-2 Management of relationships with suppliers	136–139

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

The table below includes all of the data points that derive from other EU legislation as listed in ESRS 2 appendix B. The table indicates on which page the data points can be found in Neste's Sustainability statement.

Excluded data points are marked as i) 'Not material' based on the results of the double materiality assessment, ii) 'Not disclosed', if the disclosure requirement is phased in based on the provision in Appendix C of ESRS 1, or iii) 'Not applicable' if the disclosure requirement is not relevant for Neste's business.

Disclosure requirement and related datapoint	SFDR	Pillar 3	Benchmark regulation	EU Climate Law	Page reference in Sustainability statement
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	•		•		88
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			•		88
ESRS 2 GOV-4 Statement on due diligence paragraph 30	•				140
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	•	•	•		90
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	•		•		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	•		•		Not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			•		Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				•	106–109
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		•	•		106
ESRS E1-4 GHG emission reduction targets paragraph 34	•	•	•		106–107
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	•				110
ESRS E1-5 Energy consumption and mix paragraph 37	•				110
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	•				110, 112
ESRS E1-6 Gross Scope 1, 2, 3, and Total GHG emissions paragraph 44	•	•	•		111
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	•	•	•		111, 112
ESRS E1-7 GHG removals and carbon credits paragraph 56				•	Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			•		Not disclosed
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)		•			Not disclosed
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		•			Not disclosed
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)		•			Not disclosed
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			•		Not disclosed
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	•				Not material
ESRS E3-1 Water and marine resources paragraph 9	•				Not material

<b>Disclosure Requirement and related datapoint</b>	<b>SFDR</b>	<b>Pillar 3</b>	<b>Benchmark regulation</b>	<b>EU Climate Law</b>	<b>Page reference in Sustainability statement</b>
ESRS E3-1 Dedicated policy paragraph 13	•				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	•				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	•				Not material
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	•				Not material
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	•				Not material
ESRS 2- IRO 1 - E4 paragraph 16 (b)	•				117
ESRS 2- IRO 1 - E4 paragraph 16 (c)	•				117
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	•				118
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	•				118
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	•				118
ESRS E5-5 Non-recycled waste paragraph 37 (d)	•				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	•				Not material
ESRS 2- SBM3 - S1 Risk of incidents of forced labor paragraph 14 (f)	•				Not material
ESRS 2- SBM3 - S1 Risk of incidents of child labor paragraph 14 (g)	•				Not material
ESRS S1-1 Human rights policy commitments paragraph 20	•				124
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8, paragraph 21			•		124
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	•				124
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	•				123
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	•				125, 134–135
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	•		•		128
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	•				Not disclosed
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	•		•		Not material
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	•				Not material
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	•				128
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	•		•		128
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	•				130
ESRS S2-1 Human rights policy commitments paragraph 17	•				130
ESRS S2-1 Policies related to value chain workers paragraph 18	•				130
ESRS S2-1 Non- respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	•		•		132

<b>Disclosure Requirement and related datapoint</b>	<b>SFDR</b>	<b>Pillar 3</b>	<b>Benchmark regulation</b>	<b>EU Climate Law</b>	<b>Page reference in Sustainability statement</b>
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			•		130–131
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	•				132
ESRS S3-1 Human rights policy commitments paragraph 16	•				Not material
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	•		•		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	•				Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	•				Not material
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	•		•		Not material
ESRS S4-4 Human rights issues and incidents paragraph 35	•				Not material
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	•				Not applicable
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	•				Not applicable
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	•		•		Not material
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	•				Not material

## Key Figures

<b>Income statement</b>		<b>2025</b>	<b>2024</b>	<b>2023</b>
Revenue	EUR million	19,016	20,635	22,926
EBITDA	EUR million	1,438	1,005	2,548
- of revenue	%	7.6	4.9	11.1
Operating profit	EUR million	503	25	1,682
- of revenue	%	2.6	0.1	7.3
Profit before income taxes	EUR million	199	-113	1,596
- of revenue	%	1.0	-0.5	7.0
Profit for the period	EUR million	144	-95	1,436
- of revenue	%	0.8	-0.5	6.3
Comparable EBITDA	EUR million	1,683	1,252	3,458
<b>Profitability</b>				
Return on equity (ROE)	%	2.0	-1.2	17.9
Comparable return on average capital employed, after tax (Comparable ROACE)	%	5.3	2.5	23.9
<b>Financing and financial position</b>				
Interest-bearing net debt	EUR million	3,817	4,192	2,488
Leverage ratio	%	34.3	36.1	22.7
Equity-to-assets ratio	%	46.6	47.7	53.1
Net Debt to EBITDA		2.7	4.2	1.0
<b>Other indicators</b>				
Capital employed	EUR million	12,497	12,564	12,532
Net working capital in days outstanding		34.7	39.4	41.0
Capital expenditure and investments in shares	EUR million	1,253	2,006	2,351
- of revenue	%	6.6	9.7	10.3
Research and development expenditure	EUR million	63	86	94
- of revenue	%	0.3	0.4	0.4
Average number of personnel		5,214	5,796	6,018

<b>Share-related indicators</b>		<b>2025</b>	<b>2024</b>	<b>2023</b>
Earnings per share (EPS)	EUR	0.19	-0.12	1.87
Equity per share	EUR	9.52	9.65	11.02
Cash flow per share <sup>2)</sup>	EUR	2.27	1.50	2.99
Dividend per share	EUR	0.20 <sup>1)</sup>	0.20	1.20
Dividend payout ratio	%	106.6 <sup>1)</sup>	-162.3	64.3
Dividend yield	%	1.0 <sup>1)</sup>	1.6	3.7
<b>Share prices</b>				
Closing price	EUR	19.41	12.13	32.21
Average price	EUR	11.84	19.26	37.66
Lowest price	EUR	6.79	10.98	28.55
Highest price	EUR	20.22	33.60	48.50
Market capitalization	EUR million	14,930	9,331	24,776
<b>Trading volumes</b>				
Number of shares traded	1,000	505,305	443,798	242,189
- of weighted average number of shares	%	66	58	32
Weighted average number of shares outstanding		768,246,779	768,212,287	768,175,637
Number of shares outstanding at the end of the period		768,274,059	768,215,734	768,199,747

<sup>1)</sup> Board of Directors' proposal to the Annual General Meeting.

<sup>2)</sup> The 2024 and 2023 cash flow per share has been restated in line with the restatement made into Consolidated Cash Flow Statement.

## Reconciliation of key figures to IFRS Financial Statements

Reconciliation between comparable EBITDA, EBITDA and operating profit is presented in Note 4, Segment information.

### Reconciliation of comparable return on average capital employed, after tax (Comparable ROACE), %

EUR million	2025	2024	2023
<b>Comparable EBITDA, last 12 months</b>	1,683	1,252	3,458
<b>IS</b> Depreciation, amortization and impairments	-934	-980	-866
Items in depreciation, amortization and impairments affecting comparability	-1	15	0
<b>IS</b> Financial income	27	47	45
<b>IS</b> Exchange rate and fair value gains and losses	-125	-29	-9
<b>IS</b> Income tax expense	-55	19	-160
Tax on other items affecting comparable ROACE	-63	-59	-145
Comparable net profit, net of tax	531	266	2,324
Capital employed average	12,576	12,398	11,514
Assets under construction average	-2,468	-1,756	-1,789
<b>Return on comparable average capital employed, after tax (Comparable ROACE), %</b>	5,3	2,5	23,9

### Reconciliation of equity-to-assets ratio, %

EUR million	2025	2024	2023
<b>BS</b> Total equity	7,314	7,417	8,463
<b>BS</b> Total assets	15,749	15,581	15,983
Advances received	-50	-42	-39
<b>Equity-to-assets ratio, %</b>	46.6	47.7	53.1

### Reconciliation of net working capital in days outstanding

EUR million	2025	2024	2023
Operative receivables	1,305	1,488	1,788
<b>BS</b> Inventories	2,895	2,898	3,366
Operative liabilities	-2,391	-2,159	-2,581
Net working capital	1,808	2,227	2,573
<b>IS</b> Revenue	19,016	20,635	22,926
<b>Net working capital in days outstanding</b>	34.7	39.4	41.0

## Calculation of key figures

Neste presents Alternative Performance Measures to enhance comparability between financial periods as well as to reflect operational performance and financial risk level. These indicators should be examined together with the IFRS-compliant performance indicators.

Key figure		Calculation	Reason for use
EBITDA	=	Operating profit + depreciation, amortization and impairments	EBITDA is an indicator to measure the operational performance and cash flow generation.
Comparable EBITDA	=	EBITDA +/- inventory valuation gains/losses +/- changes in the fair value of open commodity and currency derivatives +/- capital gains/losses - insurance and other compensations +/- other adjustments	Comparable EBITDA describes underlying operational performance and cash flow generation. <sup>1)</sup>
Items affecting comparability	=	Inventory valuation gains/losses, changes in the fair value of open commodity and currency derivatives, capital gains/losses, insurance and other compensations, impairments and other adjustments	Items affecting comparability are linked to unpredictability events of a significant nature that do not form part of normal day-to-day business. <sup>1)</sup>
Return on equity (ROE), %	=	$100 \times \frac{\text{Profit before income taxes} - \text{income tax expense, last 12 months}}{\text{Total equity average, 5 quarters end values}}$	Return on equity provides additional information on the profitability of operations.
Comparable return on average capital employed, after-tax (Comparable ROACE), %	=	$100 \times \frac{\text{Comparable EBITDA} - \text{depreciation, amortizations and impairments} +/- \text{items in depreciation, amortization and impairments affecting comparability} + \text{financial income} + \text{exchange rate and fair value gains and losses} - \text{income tax expense} - \text{tax on other items affecting Comparable ROACE, last 12 months}}{\text{Capital employed average} - \text{assets under construction average, 5 quarters end values}}$	Comparable return on average capital employed after-tax (Comparable ROACE) is a long-term over the cycle indicator measuring Neste's profitability and efficiency of capital usage.
Capital employed	=	Total equity + interest bearing liabilities	Capital employed is primarily used to determine the comparable return on average capital employed (Comparable ROACE) which is Neste's key financial target.
Interest-bearing net debt	=	Interest-bearing liabilities - cash and cash equivalents - current investments	Interest-bearing net debt is an indicator to measure the total external debt financing.
Leverage ratio, %	=	$100 \times \frac{\text{Interest-bearing net debt}}{\text{Interest bearing net debt} + \text{total equity}}$	Leverage ratio is one of Neste's key financial targets. It provides useful information regarding Neste's capital structure and financial risk level.

Key figure		Calculation	Reason for use
Equity-to-assets ratio, %	= 100 x	$\frac{\text{Total equity}}{\text{Total assets - advances received}}$	Equity-to-assets ratio provides useful information regarding financial risk level.
Net working capital in days outstanding	= 365 x	$\frac{\text{Net working capital}}{\text{Revenue, last 12 months}}$	Net working capital in days outstanding measures efficiency in turning net working capital into revenue.
Net Debt to EBITDA	=	$\frac{\text{Interest-bearing net debt}}{\text{EBITDA, last 12 months}}$	Net debt to EBITDA measures capital structure and ability to cover debt.
Return on net assets, %	= 100 x	$\frac{\text{Segment operating profit, last 12 months}}{\text{Average segment net assets, 5 quarters end values}}$	Neste uses return on net assets to follow the operational performance of its operating segments.
Comparable return on net assets, %	= 100 x	$\frac{\text{Segment comparable EBITDA, last 12 months - depreciation, amortization and impairments +/- items in depreciation, amortization and impairments affecting comparability}}{\text{Average segment net assets, 5 quarters end values}}$	Neste uses comparable return on net assets to follow the underlying operational performance of its operating segments.
Segment net assets	=	Property, plant and equipment + goodwill + intangible assets + investments in associates and joint ventures + inventories + interest-free receivables and liabilities - provisions - pension liabilities allocated to the business segment	Segment net assets are primarily used to determine the return on net assets and comparable return on net assets.
<b>Calculation of share-related indicators</b>			
Earnings per share (EPS)	=	$\frac{\text{Profit for the period attributable to the owners of the parent}}{\text{Weighted average number of shares outstanding during the period}}$	
Equity per share	=	$\frac{\text{Shareholder's equity attributable to the owners of the parent}}{\text{Number of shares outstanding at the end of the period}}$	
Cash flow per share	=	$\frac{\text{Net cash generated from operating activities}}{\text{Weighted average number of shares outstanding during the period}}$	

Key figure		Calculation	Reason for use
Dividend payout ratio, %	= 100 x	$\frac{\text{Dividend per share}}{\text{Earnings per share}}$	
Dividend yield, %	= 100 x	$\frac{\text{Dividend per share}}{\text{Share price at the end of the period}}$	
Average share price	=	$\frac{\text{Amount traded in euros during the period}}{\text{Number of shares traded during the period}}$	
Market capitalization	=	Number of shares at the end of the period x share price at the end of the period	

#### Calculation of key drivers

Oil Products total refining margin (USD/bbl)	=	$\frac{\text{Comparable sales margin x average EUR/USD exchange rate for the period x standard refinery yield}}{\text{Refined sales volume x standard barrels per ton}}$	Oil Products total refining margin measures the segment's comparable sales margin per refined unit sold. USD/bbl is a standard unit used in the oil industry.
Renewable Products comparable sales margin (USD/ton)	=	$\frac{\text{Comparable sales margin x average EUR/USD exchange rate for the period}}{\text{Sales volumes of renewable diesel, sustainable aviation fuel and other products}}$	Renewable Products comparable sales margin measures the sales margin per unit sold.

<sup>1)</sup> In the business environment where Neste operates, commodity prices and foreign exchange rates are volatile and can cause significant fluctuations in inventory values and operating profit. Comparable EBITDA eliminates both the inventory valuation gains/losses generated by the volatility in raw material prices and changes in open derivatives, and better reflects the company's underlying operational performance. Also, it reflects Neste's operational cash flow, where the change in operating profit caused by inventory valuation is mostly compensated by changing net working capital. Items affecting comparability are linked to unpredictability events of a significant nature that do not form part of normal day-to-day business. They include among others impairment losses and reversals, gains and losses associated with the combination or termination of businesses, restructuring costs, and gains and losses on the sales of assets. Only items having an impact of more than EUR 1 million on Neste's result will be classified as items affecting comparability.

