

DNA makes 
your world
QUICKER

DNA Corporate Responsibility Report 2011



Index

Corporate responsibility

Corporate responsibility management	1
Economic responsibility	3
Social responsibility	5
Personnel	6
Stakeholders	9
Partner networks	13
Environmental responsibility	14
Impact on society	16
Reporting	19
GRI content index	20

Corporate responsibility management

A modern Finnish telecommunications Group, DNA is committed to continuous business development, taking account of the needs of its environment and stakeholders. DNA's corporate responsibility is based on its values, corporate culture and business objectives.

DNA responds to mega-trends in its operating environment

With its stakeholders, DNA has identified three mega-trends that will have an impact on its operating environment over the coming years: electrification and convergence of services, and change in the population structure.

Services are increasingly becoming available online, and information is shared in electronic format. At the same time, voice, data, TV and other communication and entertainment services are converging, while communication devices used on the mobile network gain in importance. We live in a ubiquitous society where smart communication technologies are increasingly present.

The Finnish population structure will change radically over the coming decades. According to Statistics Finland, those over 65 will account for almost 30 per cent of the population by 2040, while the number of those in employment will fall as baby boomers retire.

DNA wants to meet the demands of these mega trends by developing next-generation electronic services and taking account of new service demands created by the changing population structure.



Materiality analysis launched towards the end of 2011

At DNA, corporate responsibility falls under the scope of the Board of Directors and the CEO; the Board aims to discuss matters related to responsibility twice a year in its meetings. At Executive Team level, the Chief Financial Officer is in charge of practical work related to corporate responsibility. He heads a horizontal corporate responsibility group that coordinates and develops DNA's corporate responsibility. The group reports twice a year to the Executive Team.

The corporate responsibility group continued its work in 2011, and DNA hired a full-time corporate responsibility expert. The group launched a materiality analysis towards the end of 2011.

The objective of the analysis is to identify the main focus areas of DNA's corporate responsibility and specify objectives and metrics for them. The analysis is continuing in early 2012 with the aim of establishing a DNA corporate responsibility programme for the coming years.

DNA's corporate responsibility objectives for 2012:

- Specification of corporate responsibility focus areas and metrics
- Creation of a corporate responsibility programme for 2012–2014
- Launch of the 'Responsible Partner' programme
- Development of GRI reporting

Corporate responsibility events in 2012:

- Launch of the 'Responsible summer job 2012' campaign
- The 'Vempaimet vaihtoon' recycling campaign at DNA Stores
- Joint projects with SOS Children's Village Association Finland and DNA
- Supporting the Plan project
- Continued participation as main partner in the protection of Lake Vesijärvi
- Participation in Earth Hour 2012
- Moving the headquarters from Vantaa to Käpylä to new, energy-efficient facilities
- Participation in Energy Saving Week 2012
- Active participation in the corporate responsibility events of FiBS
- Active representation in key industry associations, such as FiCom's Green ICT working group

Economic responsibility

Profitability and competitiveness

DNA's economic responsibility includes meeting the expectations of customers and shareholders, timely investments and product innovation and supporting the economic welfare of the company's employees and society.

Profitability of business operations is an important part of economic responsibility. Responsibility guides the company in meeting its financial objectives: open and transparent communication, corporate governance and taking environmental and social responsibility into consideration when making financial decisions. In addition, authority regulation has a strong impact on DNA's operating environment.

Profitable and planned growth, competitiveness and healthy finances will create opportunities for continuously developing DNA's operations. The company's operations are guided by an unambiguous and sustainable strategy.

DNA aims to be an even more responsible partner for its corporate and consumer customers, as well as for suppliers and subcontractors. Corporate responsibility considerations are increasingly emphasised when entering into new purchase and cooperation agreements with partners.

DNA issues quarterly financial reports and operates within the limits set by legislation and general agreements. DNA's interim reports and consolidated financial statements are prepared in accordance with International Financial Reporting Standards (IFRS).

Domestic investments and employment

Close to 100 per cent of DNA's operations take place in Finland, where the company employs directly approximately 1,000 employees and indirectly around 1,000 more. The Group's business initially grew as a result of a merger of local telephone companies and through establishing telephone service centres and outlet chains. DNA continues to have strong local presence in some hundred locations in Finland.

DNA's investments in 2011 came to EUR 119.5 million (EUR 83.4 in 2010), or 16.4 per cent of net sales (12.1 per cent). Major individual items included investments in the fibre and transfer systems as well as 3G network investments, which modernised the mobile network infrastructure in preparation for quickly increasing speeds.

DNA's economic impact on its operating environment

FROM THE CUSTOMERS

Net sales EUR 727.5 million (690.5)

DNA

TO THE PERSONNEL

Salaries and remuneration EUR 48.0 million (49.8)
Pension expenses EUR 7.7 million (9.9)

TO SUBCONTRACTORS

Materials and services EUR 377.1 million (350.8)
Other operating expenses EUR 107.4 million (98.2)

TO THE PUBLIC SECTOR

Income tax for 2011 EUR 10.4 million (14.5)
Personnel expenses EUR 10.6 million (13.3)

TO THE FINANCIAL SECTOR

Interest expenses EUR 5.9 million (5.9)

TO THE OWNERS

Dividends for 2011 EUR 29.8 million* (49.9)

** The agenda of DNA's Annual General Meeting of 15 March 2012 includes a proposal to purchase the company's own shares. If the shares will be purchased, it will be proposed to the meeting that the total amount of dividend is EUR 29.7 million, since no dividend will be paid on shares held by the company.*

Social responsibility

Vision: future-oriented employees

DNA's human resources management is based on DNA's strategy and the identification and implementation of actions in support thereof. HR management is responsible for ensuring that DNA's HR activities are aligned with the company strategy and developed to facilitate the company's business needs. There is a strong commitment to the HR vision of making DNA a company with future-oriented, skilled and motivated employees.

Year 2011 saw the establishment of a strong culture for one DNA. Other focus areas included future development of leadership and competence as well as employee well-being.

Cooperation negotiations were initiated in early 2011, after which the DNA and Welho businesses merged to form one operational entity. The new organisation entered into force on 21 February 2011. The spirit of the negotiations was good and constructive, and the restructuring of operations reduced the number of personnel significantly less than anticipated.

In 2012, HR management focuses on the following areas: competence development as per strategy requirements, development of leadership and management tools, reduction of sick leaves as well as disability pensions, and continued availability of skilled personnel.

Personnel

High employee satisfaction and well-being at DNA

The general index of the annual employee satisfaction survey remained high in 2011, at 4.2, the maximum being 6.0. According to the survey, DNA has motivated and committed employees who value their work and colleagues.

Employees gave positive feedback for flexibility of working hours enabled by flexi-time, versatile occupational health services, support for employee exercise activities and investments in competence development. The general leadership index remained at a good level, at 4.6. DNA employees value the fact that supervisors are available for discussions, provide feedback and share information.

One key development area that emerged from the survey was the development of facilities according to DNA's new working environment concept. In practice, this means that future facility planning will emphasise flexibility and good atmosphere of the working environment. According to the new concept, a good and modern working environment comprises of an open office housing different work stations for different types of work. Factors affecting employee satisfaction in open office environments include optimal acoustics in the working area and good ergonomics, both of which will receive special attention in future workspace planning according to DNA's new working environment concept.

Another development area that emerged from the survey was process management: according to the feedback, it should be clarified further. Process management was mentioned in the feedback of the survey conducted in 2010, too, but the feedback remained on a general level then. In 2011, the feedback was mostly related to named processes and functions. It typically requires several years to switch to a process-based management approach, and DNA will continue to provide additional training and information to the employees.

Eva Bergman, Development Manager:



'Today, people seem to be increasingly 'phone-phobic' and prefer email communication. I try to keep my inbox clear so that I can answer emails with practically no delay.

People highly appreciate this. Even if I can't resolve the issue, acknowledging that I am looking into it or giving tips on who to contact takes almost no time at all, but means a lot to the sender.

Good timing is no less important than quick replies; also both the sender and receiver are responsible for sharing the information with those who need it.

To me, being quick in everything we do is a prerequisite for efficiency. This by no means indicates taking shortcuts on quality.'

Personnel development as part of everyday operations

DNA Ltd organised two types of leadership coaching in 2011: qualification programme in leadership training and the Group-level 'DNA Ykkönen – parasta johtamista' programme for all supervisors. Participants included persons from DNA Store Ltd. Two groups from DNA Store Ltd also worked towards the qualification programme in store supervision. Competence development featured actively in performance reviews and everyday supervision during the year.

In December 2011, DNA Ltd launched the weekly 'AREENA' information sessions for its personnel. Organised by means of LiveMeeting, the sessions provide up-to-date information about DNA's products and services, processes and practices.

Strong investments in well-being at work

Through its selected healthcare partner, DNA provides employees with a wide selection of healthcare services in excess of the level required by law. DNA personnel can avail themselves of health services provided by, for example, specialists, gynaecologists, occupational physiotherapists and psychologists. Moreover, the quit smoking campaign continued in 2011. Employees were able to participate in 'Aslak' rehabilitation organised by the Social Insurance Institution of Finland. Occupation nurses were available at the main facilities.

To support the overall promotion of well-being of work, DNA introduced an early response model in the autumn of 2011. DNA provided training for supervisors and discussion sessions for personnel. This work will continue in 2012, with the aim of supporting use of the model.

Ergonomics experts in DNA's offices continued work to improve office ergonomics at DNA. The popular well-being at work day was organised in the autumn. As usual, the day provided employees with the opportunity to look after their health and provided tips for maintaining working capacity.

2011 was an eventful year

The entire personnel celebrated the 10-year anniversary of DNA. The company launched an internal reward campaign in the summer, with the Dudesons. During the campaign, personnel received rewards such as gift certificates for achieving their goals.

Traditional Christmas parties were organised for personnel and their children. Moreover, DNA Peers also organised some events, such as a Halloween party. Personnel clubs remained active, and several new ones were established in 2011. The employees had the chance to try different activities, such as diving and pilates, and to practise winter driving on an ice track.

Type of employment contract

Type of employment contract	2009	2010	2011*
Open-ended	792	955	1,015
Fixed-term	26	48	20
Total	818	1,003	1,035

* Includes Forte Netservices Oy as of 12 July 2011.

Type of employment

Type of employment	2009	2010	2011*
Full-time	800	963	997
Part-time	18	40	38
Total	818	1,003	1,035

* Includes Forte Netservices Oy as of 12 July 2011.

Gender structure

By gender	2009	2010	2011*
Women	250	318	333
Men	568	685	702
Total	818	1,003	1,035

* Includes Forte Netservices Oy as of 12 July 2011.

Age structure

By age group	2009	2010	2011*
< 25			31
25-34	219	342	284
35-44	290	345	382
45-54	216	242	257
55-64	93	74	81
Total	818	1,003	1,035

* Includes Forte Netservices Oy as of 12 July 2011.

Share of women (%) per personnel group *

Personnel groups include women as follows:

Of management	26%
Of managerial employees	24%
Of administrative employees	39%
Of service and production employees	16%

* Does not include Forte Netservices Oy.

Stakeholders

Stakeholder survey organised in the autumn

DNA organised a comprehensive corporate responsibility materiality analysis in the autumn of 2011, inviting close to 5,000 stakeholder representatives to participate in a survey. The survey answer rate was approximately 14.0 per cent. It was sent to both internal and external stakeholders.

- Internal stakeholders: personnel and shareholders
- External stakeholders: customers, authorities, associations, financial and insurance markets, media, delivery chain and partners.

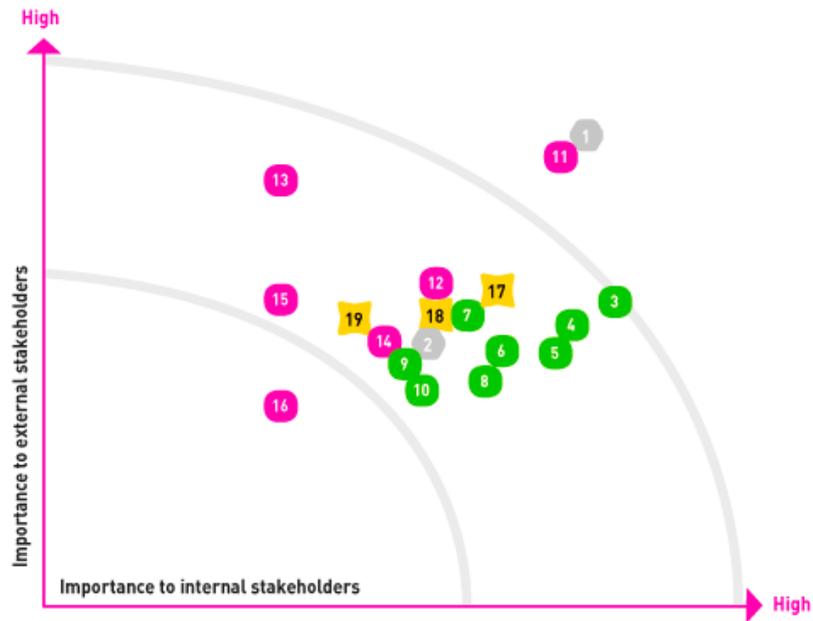
The stakeholder survey aimed to identify the stakeholders' views on DNA's corporate responsibility, identify focus areas and suitable communication methods.

Slightly less than 10 per cent of external stakeholders and some 30 per cent of internal stakeholders were familiar with DNA's corporate responsibility communication. They would like to see DNA use its website and emails for corporate responsibility communication. Participants also expressed a wish to see tangible and unambiguous corporate responsibility communication.

The following matrix lists the material corporate responsibility aspects identified as a result of the survey. They are divided into four categories:

1. Infrastructure and purchasing
2. DNA
3. Customer
4. General

Materiality matrix



INFRASTRUCTURE AND PURCHASING

- 1 Network reliability under all circumstances
- 2 Payments to service and goods providers

DNA

- 3 Employee satisfaction and well-being
- 4 Occupational health and safety
- 5 Equality
- 6 Remote work opportunities
- 7 Adhering to competitive regulations
- 8 Developing the competence of personnel
- 9 Corporate governance
- 10 Internal ethical guidelines

CUSTOMER

- 11 Data security
- 12 Development of electronic services
- 13 Customer service, honouring commitments
- 14 Online safety of young users
- 15 Responsibility for terminal usability
- 16 Services for ageing population

GENERAL

- 17 Investments and employment in Finland
- 18 Using and developing environmentally sound (technological) solutions
- 19 Promoting regional equality (personnel and services)

Different stakeholder groups identified specific needs

Both external and internal stakeholders identified data security and network reliability under all circumstances as the most important aspects of DNA's corporate responsibility. They also valued investments in Finland, as well as the development of environmentally sound technological solutions.

Answers provided by personnel, shareholders, customers and suppliers also comprised views that, while relevant to the group in question, are less relevant to other stakeholders.

DNA's personnel considered investments in employee satisfaction and well-being as very important. Customers in turn considered the development of electronic services and customer service and keeping promises as highly important.

Material views:

- Personnel: Employee well-being; Flexible and pleasant working environment; Remote work opportunities
- Shareholders: Adhering to competitive regulations; Profitable business operations
- Customers: Responsibility for device reliability; Keeping promises; Customer service
- Partners: Payments to service and goods providers; Working conditions and human rights of partners' and subcontractors' employees.

Close stakeholder engagement

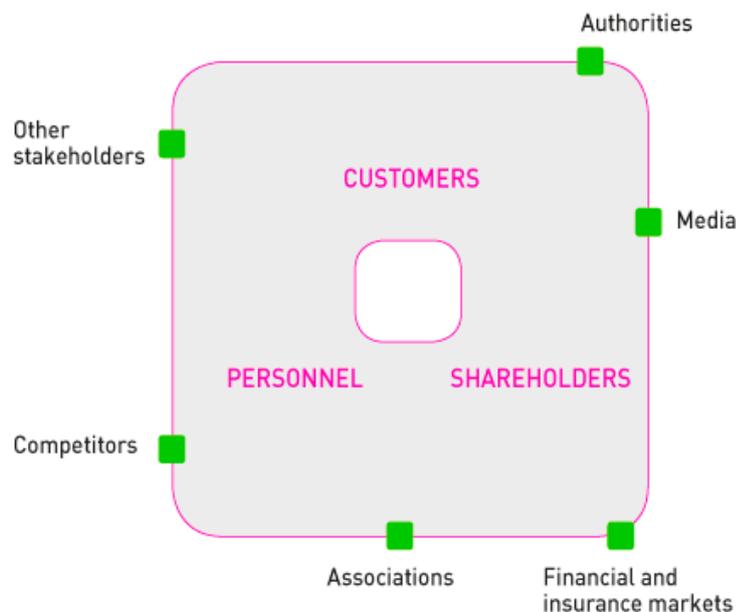
DNA considers stakeholder communication and feedback to be highly important. High standards of customer service, cooperative networking with other businesses, relationships with partners and support for non-profit causes form part of DNA's broad stakeholder interaction. DNA emphasises good and clear practices in its customer service – over the phone, in stores and by electronic means.

The Internet-based customer panel is one of the main interaction channels for consumer customers. This panel provides DNA with quick feedback and information on its customers' opinions, expectations and values. DNA also has an active presence in the social media, in Facebook for example, where anyone is welcome to interact openly with the company.

DNA is also an active participant in the work of associations and trade organisations, as well as in developing the industry and safeguarding its interests. DNA engages in active communication with various authorities and political decision-makers and is a member of various associations, including the Service Sector Employers PALTA, the Finnish Federation for Communications and Teleinformatics (FiCom), the European Competitive Telecommunications Association ECTA and Cable Europe.

FiCom's task is to promote business opportunities for its members and to enhance their competitiveness. FiCom also develops performance reliability in the data network sector and contributes to ICT readiness in case of major disturbances and emergencies. ECTA and Cable Europe are European telecom interest groups.

Stakeholder map



DNA Welho has the most satisfied pay-TV customers

According to the annual EPSI Rating study, DNA Welho had the most satisfied customers in the pay-TV market. In addition to flexible channel packages, customers valued reliability and customer service.

DNA maintained its position in the top three mobile communication service providers for corporate customers. According to corporate customers, DNA's value for money was considered the best among large operators, although satisfaction with DNA's mobile communication services fell slightly from the previous year.

DNA Welho was a strong number two in fixed-network broadband services. In mobile broadband services, DNA was placed in the top three, improving from last year. Somewhat surprisingly, mobile broadband customers were significantly more satisfied in rural as opposed to urban areas.

Customer satisfaction

Results of the EPSI Rating study, DNA and DNA Welho*	2010	2011
Mobile communication services for consumers (DNA)	73.6	73.8
Broadband services for consumers (DNA)	65.4	-
Broadband services for consumers (DNA Welho)	-	69.4
Mobile communication services for corporations (DNA)	66.7	65.3
Broadband services for corporations (DNA)	64.3	65.8
Pay-TV (DNA Welho)	-	67.4

* Information on DNA Welho available since 2011

SOS Children's Village and DNA began collaboration

In October, SOS Children's Village Association Finland, a child protection service provider, and DNA Ltd agreed on long-term cooperation, with DNA offering financial support and data communication connections for the association's offices. DNA is one of the main cooperation partners of SOS Children's Village Association Finland.

At the heart of SOS Children's Village Association Finland are its homes in SOS children's villages in Kaarina, Espoo, Vihanti, Punkaharju and Ylitornio. In these homes, children taken into care can live an ordinary life with their foster parents. The association also has an adolescent home in Jyväskylä and a camping centre in Pello. The mission of the association is to help children who are without parental security, or who are in danger of losing their parents.

In previous years, DNA has supported work with children and adolescents by promoting, e.g. data security awareness and the prevention of bullying in schools. In the first year of partnership between SOS Children's Village Association Finland and DNA, financial assistance will be directed towards Theraplay therapy activities. DNA employees will also be given the opportunity to take part in voluntary work and efforts will be made to support the association's other fundraising activities.

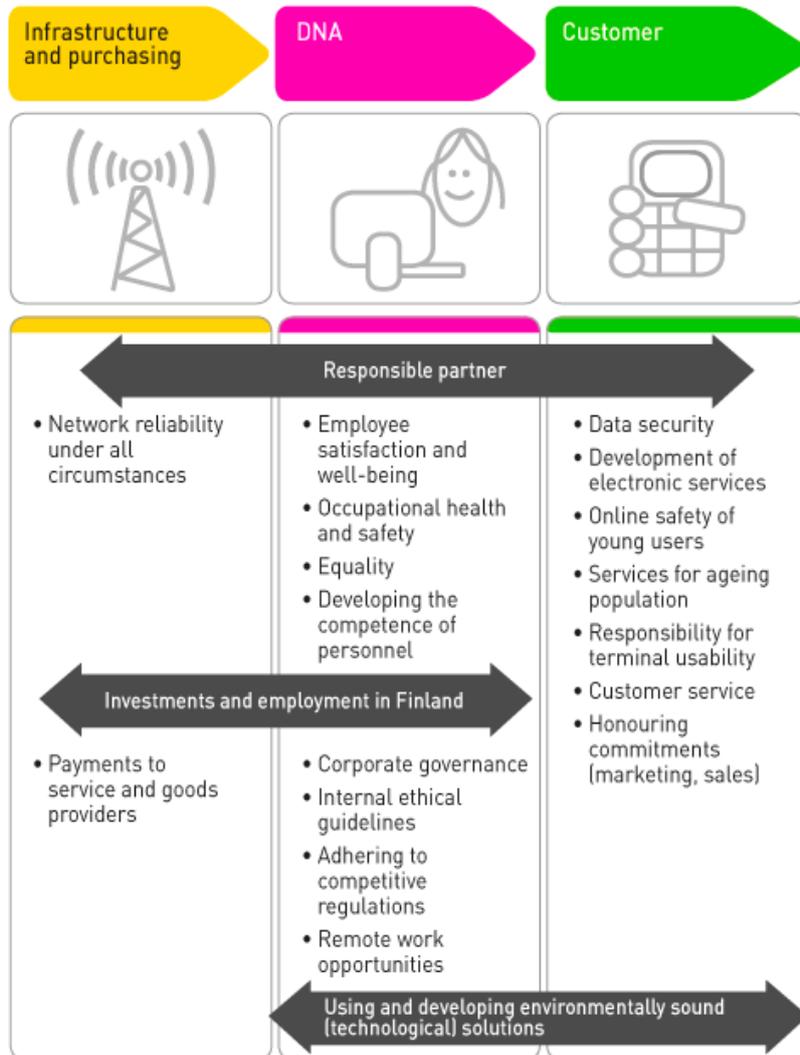
Partner networks

Responsible partnerships developed further in 2012

DNA's corporate responsibility group has specified responsible partnerships as a key development area in 2012. To DNA, responsibility in partnerships means considering responsibility throughout the value chain, from infrastructure investments and purchases to the final product and service delivered to the customer.

As a responsible partner, DNA wants to monitor and develop its own corporate responsibility, but also expects its partners to take economic, environmental and social responsibility into consideration in their operations.

Corporate responsibility value chain



Environmental responsibility

Modernisation cuts relative energy consumption

Global climate change poses challenges to companies in every industry. DNA considers it important to recognise the environmental impacts and risks of its business, and to adapt operations according to the principles of sustainable development.

The company honours its environmental responsibility by developing new, environmentally friendly technologies and by offering customers the opportunity to control environmental impacts through flexible Internet and mobile communication services. DNA complies with current environmental legislation and expects the same from its subcontractors and partners.

Due to its electricity consumption, DNA's mobile radio network has been identified as the main source of environmental impacts. DNA continued the modernisation of its radio network in 2011, implementing next-generation base stations, where all mobile communication technologies are integrated into one base station. This eliminates the need to construct separate base stations.

The energy efficiency of new base station technologies in the transfer of 3G HSDPA data has improved vastly: it is estimated that on an annual level, 40 per cent less energy is required to transfer the same amount of data than with base stations that use the old technology.

The new system is called Single RAN (RAN=Radio Access Network). With the introduction of a Single RAN system, DNA requires fewer devices, thereby reducing relative energy consumption. On the other hand, data traffic volumes are continuously increasing. To meet this demand, DNA must increase the number of devices, which will in turn increase relative energy consumption.

Although data and communication technology enable solutions that reduce the carbon footprint and increase cost-efficiency, increased use of technologies also significantly increases energy consumption.

The 4G technology launched towards the end of 2011 reduced relative per-data energy consumption further, through improved technical performance. DNA is using existing mobile network masts to construct its terrestrial TV broadcasting networks, while its broadcasts benefit from efficient use of frequencies.

Network modernisation and the adoption of 4G technology are expected to decrease the network's total energy consumption, or at least keep it at its current level in spite of the growing need to multiply mobile broadband capacity.

Environmentally friendly practical solutions

DNA is placing an increased emphasis on the environmental impact of travel, and favours using solutions such as phone and video meetings to reduce the need to travel. The company provides its employees with opportunities for flexible work, such as remote work.

DNA lowered the CO₂ emission limits of company cars in September 2011. The new CO₂ emission limit is max. 160 g/km.

DNA launched a new mobile extension solution towards the end of 2011. With the solution, the service concept that was previously available to enterprises is now also available to SMEs, replacing traditional fixed extensions.

Combined with DNA's other mobile communication services, the mobile extension gives SMEs the opportunity to wave goodbye to fixed voice services. It also reduces environmental effects by eliminating the need of using separate telephone systems in the office.

Finnish teleoperators introduced mobile certificates in the market in 2011, enabling strong electronic authentication and the use of electronic signatures. Positive environmental effects are due to reduced prints and transports.

DNA emphasises the durability, life cycle and recovery of materials throughout the supply chain. Materials are recycled and waste is sorted at the company's sites and retail outlets. DNA is reducing its paper consumption by favouring new communication solutions. DNA participates in the annual Energy Saving Week, distributing information and energy saving tips for office and home use.

Award for innovative terrestrial broadcast network

In September, DNA won two awards at the IBC Awards Ceremony, the premier annual event for television and broadcasting professionals worldwide.

DNA received the IBC Innovation Award for its unique terrestrial network with a spectrally efficient system. The network was constructed using existing masts in the mobile communication network. Thanks to efficient frequency use, DNA can broadcast even more channels. The jury presented DNA with a special award, the Judges Prize, for the quick launch of its TV business on the terrestrial network.

These awards are recognition of DNA's service concept, which is groundbreaking on an international scale, as well as its investments in the TV business. Significant opportunities for future innovation, new products and technological development exist in the business.

DNA actively participates in greening the industry

DNA is an active participant in the Green ICT working group set up by FiCom, the Finnish Federation for Communications and Teleinformatics. Members of the working group include telecommunications and information technology companies, which assess the impact of their operations according to GRI indicators. The project will map the services offered by ICT companies, in order to help other sectors improve their energy efficiency.

EN3 – Direct energy consumption by primary energy source (terajoules)

	2010	2011*
Consumption of own vehicles (diesel, petrol)	approx. 5.07	approx. 5.83
Other fuel	approx. 1.29	approx. 0.89

* The figures represent the best possible estimates on energy consumption at DNA Group. They do not include Forte Netservices Oy.

EN4 – Indirect energy consumption by primary energy source (terajoules)

	2010	2011*
District heating	14	29
Electricity	335	398

* The figures for 2010 and 2011 are not entirely comparable due to development of the accounting system in 2011. The figures represent the best possible estimates on the consumption of DNA Group. They do not include Forte Netservices Oy.

EN22 – Total weight of waste (tonnes)

	2010	2011*
Recycle waste	19.51	143.4
Energy waste	25.76	59.05
Mixed waste	58.55	43.79
Hazardous waste	38.49	9.9
Total	142.31	256.14

* The monitoring and reporting methods of office waste have been adjusted during 2011. Due to this, the figures for 2010 and 2011 are not entirely comparable.

DNA Community



1. Modern communication services

The infrastructure of the information society with its increasingly high-speed broadband networks is evolving at a great pace. In addition to digital TVs, mobile phones, PCs and fixed broadband connections, a growing number of Finnish households is also using mobile broadband connections (Source: 'DNA Suomalaiset ja viihde 2011' survey).

Our society is characterised by a continuous demand for up-to-date information. Consumers and companies alike depend on reliable connections and communication services. Increasingly, services are electronic and available anytime, anywhere.



DNA provides high-quality voice, data, mobile and TV services to homes, corporations and communities. DNA enables flexible solutions for remote work and web meetings. Corporate customers can avail of DNA's mobile switchboard -based voice solutions as well as flexible office and Internet-based communication services.

'DNA Toimisto' ('DNA Office') is an example of a flexible business solution with packaged services tailored to meet company-specific communication and data management needs. The service includes an option to deploy a cost-effective Google application that is used over the Internet in the cloud. This means that the company does not have to invest in hardware or software or worry about their maintenance.

2. Reliable partner

DNA takes pride in being a reliable partner to corporations and consumers. Close to 100 per cent of DNA's operations take place in Finland. In 2011, the company invested, in particular, in the reliability and data security of its networks.

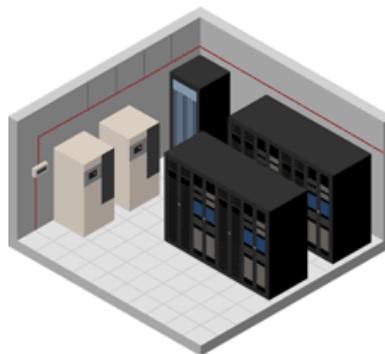
DNA's corporate responsibility group has specified responsible partnerships as a key development area in 2012. To DNA, responsible partnerships mean applying responsibility throughout the value chain from infrastructure investments and purchases to the final product and service delivered to the customer.

As a partner, DNA wants to monitor and develop its own corporate responsibility but also expects its partners to take economic, environmental and social responsibility increasingly into consideration in their operations.

DNA boasts the most extensive service network in Finland, bringing services close to the customer. It delivers local high-quality customer service with a genuine attitude. DNA serves consumers and corporations nationwide with its network of 77 DNA Stores, online store, phone-in service, external representatives and close to 100 corporate sales agents.

3. Development of critical infrastructure

DNA's most important undertaking as a member of the Finnish society is to provide and develop telecommunication connections. For its own part, DNA ensures that these connections will be available not only under normal conditions but also in the event of disruptions and during exceptional situations. By doing so, DNA, for its part, takes responsibility for securing functions that are vital to the society.



DNA provides and maintains infrastructure that is critical to the operation of the society. These include fixed-broadband connections and radio masts essential for mobile communications as well as fibre optics -based transfer connections. In recent years, DNA has focused on a comprehensive coverage of its terrestrial TV services in addition to cable TV network.

DNA considers it important to develop environmentally friendly technologies and to find new energy-efficient solutions. Due to its electricity consumption, DNA's mobile radio network has been identified as the main source of environmental impacts.

DNA continued the modernisation of its radio network in 2011, implementing next-generation base stations, where all mobile communication technologies are integrated into one base station. This eliminates the need to construct new base stations. The energy efficiency of new base station technologies in the transfer of 3G HSDPA data has improved vastly: it is estimated that on an annual level, 40 per cent less energy is required to transfer the same amount of data than with base stations that use old technology.

4. Changing society, changing service needs

With its stakeholders, DNA has identified three mega-trends that will have an impact on its operating environment over the coming years: electrification and convergence of services, and change in the population structure.

DNA wants to meet the demands of these mega-trends by spearheading the development of electronic services and taking account of new service demands created by the changing population structure.

Services are increasingly becoming available online, and information is shared in electronic format. DNA meets these changing needs by developing versatile electronic services. For example, the mobile certificate, introduced by Finnish operators in 2011, enables strong electronic authentication and use of electronic signatures.

DNA has been a frontrunner in the development of the M2M (Machine to Machine) technology. The technology enables a company, such as an electricity supplier, security service provider or transport company, to transfer data from one machine to another as part of a more extensive system or service. An example of M2M technology application is a remote electricity reader that enables real-time monitoring of electricity consumption.

The Finnish population structure is changing. According to Statistics Finland, those over 65 will account for almost 30 per cent of the population by 2040, while the number of those in employment will fall as baby boomers retire. The dependency ratio of the population is also rapidly rising.

DNA's dedicated telephone service takes account of senior customers' special needs. DNA also participates in the prevention of digital exclusion of senior citizens together with Ficom, the Finnish Federation for Communications and Teleinformatics. Technical solutions, such as e-Health services, remote monitoring and automatic safety solutions (e.g. stove shut-off and safety bracelets), help the elderly to live at home for longer. The availability of electronic services reduces the need to go out when it is difficult to do so or when weather conditions are more dangerous. (Source: FiCom 2011)



5. Children and teenagers

DNA considers it important to guide young users on the safe use of the Internet and mobile phones. DNA has signed a European framework agreement, European Framework for Safer Mobile Use by Younger Teenagers and Children, which aims to improve the safety of mobile phone use by teenagers and children. DNA has also signed the Finnish code of conduct on the safe use of mobile phones by younger teenagers and children.



In addition to promoting data security awareness, DNA has supported work with children and adolescents by participating in the prevention of bullying in schools.

In October 2011, DNA and SOS Children's Village Association Finland agreed on long-term cooperation. As one of its main partners, DNA provides financial support and data communication connections to the organisation. In the first year of partnership, financial support will be directed towards child therapy. DNA's employees will also be given the opportunity to take part in voluntary work, and efforts will be made to support the association's other fundraising activities.

*SOURCES (in Finnish):
'DNA Suomalaiset ja viihde 2011' survey (briefly in English)
FiCom ry's Toimialakatsaus 2011*

Reporting principles

Reporting according to GRI guidelines

In 2011, DNA Ltd continued to report on corporate responsibility according to the Global Reporting Initiative reporting model. With a reporting period of one calendar year, DNA publishes this GRI-compliant corporate responsibility report annually. The previous report was published on 10 March 2011. The reports for 2010 and 2011 follow the Global Reporting Initiative's G3 (GRI version 3.1) guidelines, both at level C.

DNA's corporate reporting is based on the guidelines, principles and calculation methods specified by GRI. The reporting includes DNA Ltd and DNA Store Ltd. In July 2011, DNA acquired Forte Netservices Oy, which is included in the figures reported for economic responsibility. Forte Netservices Oy is for the most part not included in the figures reported under environmental and social responsibility.

The GRI reporting model relies on the principle of materiality: the company reports on those figures and indicators relevant to its business model. DNA conducted a materiality analysis towards the end of 2011. Analysis of the results continues in 2012.

CR reporting developed by means of stakeholder survey

To identify the relevant areas of its corporate responsibility, DNA conducted a survey among its main stakeholders: personnel and shareholders, customers, authorities, partners and suppliers as well as representatives of the financial and insurance markets and the media. The materiality analysis was organised in collaboration with Tofuture Oy, a sustainability consulting company.

DNA's reporting mainly consists of the same GRI indicators as in 2010. These indicators have been selected by the corporate responsibility group and will be processed by the Board of Director's Audit Committee. They are reviewed and developed annually as part of the corporate reporting cycle.

DNA's corporate responsibility report is mainly intended for shareholders and personnel, customers, authorities as well as representatives of the financial and insurance markets. As part of the materiality analysis in 2011, DNA surveyed how familiar DNA's stakeholders were with DNA's corporate responsibility reporting for 2010. Slightly fewer than one in ten external participants had familiarised themselves with DNA's corporate responsibility report, while fewer than one in three internal participants had done so.

Contact information

DNA's Corporate Responsibility Specialist Noomi Lehtosaari is responsible for compiling DNA Ltd's corporate responsibility report, tel. +358 44 044 2345, forename.surname@dna.fi.

At the Executive Team level, CFO Ilkka Pitkänen is in charge of corporate responsibility, forename.surname@dna.fi.

GRI Content Index

- Fully reported
- ◐ Partly reported
- Not reported

GRI	Indicator	Reference	Status of reporting
1. Strategy and Analysis			
1.1	Statement from the most senior decision maker in the organisation	Management review	●
1.2	Description of key impacts, risks and opportunities	Management review ; Strategic choices ; Board of Director's report	●
2. Organisational Profile			
2.1	Name of the reporting organisation	DNA Ltd	●
2.2	Primary brands, products and services	DNA and DNA Welho	●
2.3	Operational structure of the organisation	DNA in brief ; changes in the Group structure . See also notes 18 Investments in associates and 34 Related parties to the consolidated financial statements.	●
2.4	Location of organisation's headquarters	Consolidated financial statements: note 1 The Group in brief	●
2.5	Countries where the organisation operates	Almost 100 per cent of DNA's operations occur in Finland. In July 2011, DNA acquired Forte Netservices Oy. Forte mostly operates in Finland. Finnish operations are supported by some sales and service employees in other countries. See DNA's subsidiaries in note 34 Related parties to the consolidated financial statements.	●
2.6	Nature of ownership and legal form	DNA in figures	●
2.7	Markets served	Almost 100 per cent of DNA's operations occur in Finland. In July 2011, DNA acquired Forte Netservices Oy. Forte mostly operates in Finland. Finnish operations are supported by some sales and service employees in other countries. See DNA's subsidiaries in note 34 Related parties to the consolidated financial statements.	●
2.8	Scale of the organisation	DNA in figures	●
2.9	Significant changes during the reporting period regarding size, structure or ownership	Board of Director's report and changes to the Group structure	●
2.10	Awards received in the reporting period	In September, DNA won two awards at the annual IBC Awards Ceremony .	◐
3. Report Parameters			
REPORT PROFILE			
3.1	Reporting period	The GRI report is published annually with the Annual Report.	●

3.2	Date of most recent previous report	DNA published its first GRI report on 10 March 2010.	●
3.3	Reporting cycle	Annually	●
3.4	Contact point for questions regarding the report	Reporting – Contact information	●
REPORT SCOPE AND BOUNDARY			
3.5	Process for defining report content (determining materiality, prioritising topics, identifying stakeholders expected to use the report)	Stakeholders and Reporting principles	●
3.6	Boundary of the report	Reporting principles	●
3.7	Specific limitations on the scope or boundary of the report	Reporting principles	●
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities and outsourced entities	Reporting principles	●
3.9	Data measurement techniques and calculation principles	Reporting principles	◐
3.10	Explanation of the effect of any re-statements of information provided in earlier reports	Any deviations from or changes to the calculation limits are mentioned with each key figure. Reporting principles	●
3.11	Significant changes from previous reporting periods in the scope, boundary or measurement methods applied in the report	Any deviations from or changes to the calculation limits are mentioned with each key figure. Reporting principles	●
GRI INDEX			
3.12	Table identifying the location of the Standard Disclosures in the report (identifying links to relevant pages).	GRI Content Index	●
ASSURANCE			
3.13	Policy and current practice with regard to seeking external assurance for the report	DNA's corporate responsibility report for 2011 has not been subject to external assurance.	◐
4. Governance, Commitments and Engagement			
GOVERNANCE			
4.1	Governance structure of the organisation	Corporate governance ; Governing bodies	●
4.2	The Chairman of the Board's role in the organisation	The Chairman of DNA Ltd's Board of Directors is not an executive officer. Corporate governance ; Board of Directors	●
4.3	Independent and/or non-executive board members	Not reported in 2011.	◐
4.4	Mechanisms for shareholders and employees to provide recommendations to the board	Shareholders exercise their shareholder power in the General Meeting. DNA's Board of Directors does not have an employee representative. Personnel representatives are invited to the meetings of the extended Group Executive Team. Corporate governance - General Meeting	●

4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance)	DNA's remuneration principles do not specify a linkage between the organisation's corporate responsibility performance and compensation for members of the highest governance body, senior managers and executives. For more details on salaries and commissions of the Board of Directors and management, see Earnings per share and Employee benefits and number of personnel	
4.6	Processes in place for the highest governance body, to ensure conflicts of interest are avoided	Not reported in 2011.	
4.7	Processes for determining the qualifications and expertise of the highest governance body, for guiding the organisation's strategy on economic, environmental and social topics	DNA's Board of Directors has not assigned corporate responsibility to any members of the Board, nor does the company have a separate process for determining the qualifications and expertise of members regarding corporate responsibility. Board of Directors	
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental and social performance	Not reported in 2011.	
4.9	Procedures of the Board for overseeing the organisation's sustainability work	The same principles apply to overseeing sustainability work as to overseeing the rest of the company's operations. Corporate governance; Board of Directors	
4.10	Process for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance	The Board of Directors carries out an internal self-evaluation of its operations once per year. Board of Directors	
COMMITMENTS TO EXTERNAL INITIATIVES			
4.11	Explanation of whether and how the precautionary principle is applied	Significant risks and uncertainties	
4.12	Endorsement of externally developed economic, environmental and social charters, principles or other initiatives	In autumn 2010, DNA signed the Finnish Code of Conduct for Safer Mobile Use by Younger Teenagers and Children. During the same autumn, DNA also signed the European Framework for Safer Mobile Use by Younger Teenagers and Children.	
4.13	Memberships in associations and advocacy organisations	DNA's main memberships: Service Sector Employers PALTA, GSM Association, European Cable Communications and European Competitive Telecommunications Association (ECTA). For more details on DNA's memberships, see Stakeholders	
STAKEHOLDER ENGAGEMENT			
4.14	List of stakeholder groups engaged by the organisation	Specified by the CR steering group as part of the materiality assessment. For more information, see stakeholders [linkki sidosryhmiin]	
4.15	Basis for identification and selection of stakeholders with whom to engage	Specified by the CR steering group as part of the materiality assessment. For more information, see Stakeholders	
4.16	Approaches to stakeholder engagement	See Stakeholders	
4.17	Key topics and concerns that have been raised through stakeholder engagement	See Stakeholders - Materiality matrix	

5. Management Approach and Performance Indicators			
Economic			
Disclosure of Management Approach		See Economic responsibility	
Economic Performance Indicators			
ASPECT: ECONOMIC PERFORMANCE			
EC1	Direct economic value generated and distributed	DNA's economic impact on its operating environment . For more information, see consolidated income statement	
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change	Not reported in 2011.	
EC3	Coverage of the organisation's defined benefit plan obligations	Annual report - notes to the consolidated financial statements: notes 2 Accounting principles and 26 Defined benefit plan	
EC4	Significant financial assistance received from government	DNA received no significant financial assistance from government or other administrative public bodies in 2011.	
ASPECT: MARKET PRESENCE			
EC5	Range of ratios of standard entry level wage to local minimum wage at significant locations	Not reported in 2011.	
EC6	Proportion of spending on locally based suppliers	Not reported in 2011.	
EC7	Local hiring	Not reported in 2011.	
ASPECT: INDIRECT ECONOMIC IMPACTS			
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind or pro bono engagement	Economic responsibility and DNA's impact on society, entry 5 Children and teenagers	
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts	Not reported in 2011.	
Environmental			
Disclosure of Management Approach		Environmental responsibility	
Environmental Performance Indicators			
ASPECT: MATERIALS			
EN1	Materials used by weight or volume	Not reported in 2011.	
EN2	Percentage of materials used that are recycled input materials	Not reported in 2011.	
ASPECT: ENERGY			
EN3	Direct energy consumption by primary energy source	Environmental responsibility	
EN4	Indirect energy consumption by primary energy source	Environmental responsibility	

EN5	Energy saved due to conservation and efficiency improvements	DNA participated in the annual Energy Saving Week in the autumn of 2011, distributing information and energy saving tips for office and home use. See also Environmentally friendly practical solutions in Environmental responsibility	
EN6	Initiatives to provide energy-efficient or renewable energy based products and services	Not reported in 2011.	
EN7	Initiatives to reduce indirect energy consumption and reductions achieved	Not reported in 2011.	
ASPECT: WATER			
EN8	Total water withdrawal by source	Not reported in 2011.	
EN9	Water sources significantly affected by withdrawal of water	Not reported in 2011.	
EN10	Percentage and total volume of water recycled and reused	Not reported in 2011.	
ASPECT: BIODIVERSITY			
EN11	Location and size of land owned, leased managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Operation and ownership of the mobile communication network is an essential part of DNA's business. Some base stations are located in areas of high biodiversity value or nearby such areas (e.g. areas included in the Natura network). DNA pays special attention to biodiversity when operating in these areas, and adheres to current legislation.	
EN12	Description of significant impacts of activities on biodiversity in protected areas and areas of high biodiversity value outside protected areas	Not reported in 2011.	
EN13	Habitats protected or restored	Not reported in 2011.	
EN14	Strategies, current actions and future plans for managing impacts on biodiversity	Not reported in 2011.	
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	Not reported in 2011.	
ASPECT: EMISSIONS, EFFLUENTS AND WASTE			
EN16	Total direct and indirect greenhouse gas emissions	Not reported in 2011.	
EN17	Other relevant indirect greenhouse gas emissions	Not reported in 2011.	
EN18	Initiatives to reduce greenhouse gas emissions	DNA lowered the CO2 emission limits of company cars in September 2011. The new CO2 emission limit is max. 160 g/km. See also Environmental responsibility	
EN19	Emissions of ozone-depleting substances	Not reported in 2011.	
EN20	NO, SO, and other significant air emissions by type	Not reported in 2011.	

EN21	Total water discharge	Not reported in 2011.	
EN22	Total weight of waste by type and disposal method	Environmental responsibility	
EN23	Total number and volume of significant spills	Not reported in 2011.	
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous	Not reported in 2011.	
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff	Not reported in 2011.	
ASPECT: PRODUCTS AND SERVICES			
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation	Environmental responsibility	
EN27	Percentage of products sold and their packaging materials that are reclaimed by category	Not reported in 2011.	
ASPECT: COMPLIANCE			
EN28	Monetary value of significant fines for non-compliance with environmental laws	DNA has not been subject to any fines or non-monetary sanctions for non-compliance with environmental laws during the reporting period.	
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations and transporting members of the workforce	Not reported in 2011.	
ASPECT: SUMMARY			
EN30	Total environmental protection expenditures and investments by type	Not reported in 2011.	
Social Performance Indicators			
HR management approach		Social responsibility	
ASPECT: EMPLOYMENT			
LA1	Total workforce by employment type, employment contract, and region	Personnel	
LA2	Rate of employee turnover by age group, gender and region	DNA Group's rate of employee turnover was 10.0 per cent in 2011 (8.5 per cent in 2010). The figure does not include fixed-term employment contracts or internal transfers.	
LA3	Benefits provided to employees by employment type	DNA Ltd provides the same benefits to all employees, regardless of employment type. The benefits and policies of DNA's sales organisation, DNA Store Ltd, apply to all DNA Store employees regardless of employment type.	
ASPECT: LABOUR/MANAGEMENT RELATIONS			

LA4	Percentage of employees covered by collective bargaining agreements	All DNA Group staff are covered by the applicable collective bargaining agreements specific to each employee category. Service and production employees are covered by the collective agreement in the energy-ICT-networks sector, and administrative and managerial employees by the collective agreement for salaried and senior salaried employees in the ICT sector.	
LA5	Minimum notice period(s) regarding operational changes	At a minimum, DNA has observed the minimum notice periods for the applicable collective agreements during operational changes.	
ASPECT: OCCUPATIONAL HEALTH AND SAFETY			
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programmes	DNA Ltd has a statutory labour protection committee that consists of regional labour protection delegates. The committee members include ten labour protection delegates and the labour protection officer.	
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities by region	The Group-level relative rate of absenteeism was 3.4 per cent in 2011 (3.52 per cent in 2010). There were no work-related fatalities. There were 19 work time injuries and 136 working days were lost due to work-related reasons. Most of the work time injuries occurred on the way to or from work.	
LA8	Education, training, counselling, prevention and risk-control programmes in place to assist workforce members regarding serious diseases	DNA Ltd has a comprehensive occupational healthcare service agreement with Mehiläinen. In addition to statutory healthcare services, the agreement covers services provided by, for example, specialists as well as occupational physiotherapists and psychologists. DNA employees can visit any Mehiläinen branch, and occupational nurses are available monthly from DNA's main facilities. DNA organises an annual well-being at work theme day with occupational healthcare, and also organised a quit smoking campaign and provided guidance on office ergonomics. Age group-based health checks are organised for those over 30. When necessary, Mehiläinen's 'Työkuntoon' model is used to help maintain employees' working capacity. DNA has been granted 'Aslak', a vocationally oriented medical rehabilitation by the Social Insurance Institution of Finland, for two consecutive years.	
LA9	Health and safety topics covered in formal agreements with trade unions	DNA believes that statutory labour protection activities in Finland cover LA9 requirements. DNA's labour protection committee (2012–2014) has one labour protection delegate per office, a labour protection officer as well as representatives of office and human resource management. The committee meets once a quarter. A typical agenda includes reviewing areas such as accident, sick leave and overtime statistics, as well as dealing with possible occupational safety issues.	

ASPECT: TRAINING			
LA10	Average hours of training per year per employee	Average hours of training/employee in 2011 (DNA Ltd). Not reported for DNA Store. Senior salaried employees 34.8 Salaried employees 23.5 Workers 29.4 Average/person 28.6	
LA11	Programmes for skills management and lifelong learning that support employees' career development	DNA Ltd currently organises two types of leadership coaching, and participants include persons from DNA Store Ltd: the 'JET' qualification programme in leadership training (three groups, total of some 45 participants) and the Group-level 'DNA Ykkönen – parasta johtamista' programme for all supervisors (some 140 supervisors). Two groups from DNA Store Ltd also worked towards the qualification programme in store supervision (a total of some 30 participants). Competence development featured actively in performance reviews and everyday supervision during the year. For more information, see Personnel	
LA12	Percentage of employees receiving regular performance development reviews	DNA Ltd conducted performance reviews with 100 per cent attendance for all permanently employed persons not on leave and temporary employees whose employment continues until the end of the year under review. DNA Store Ltd arranges sales-related performance reviews with employees, as required. These reviews focus on the development of sales skills and competence.	
ASPECT: DIVERSITY AND EQUAL OPPORTUNITY			
LA13	Composition of governance bodies and employees according to diversity indicators	In 2011, two of the eight members of DNA's Board of Directors and two of the eleven members of the Executive Team were women. For more info, see Personnel	
LA14	Ratio of basic salary of men to women by employee category	Not reported in 2011.	
Human Rights			
Human rights management approach		Not reported in 2011.	
Human Rights Performance Indicators			
ASPECT: INVESTMENT AND PROCUREMENT PRACTICES			
HR1	Investment agreements that include human rights clauses	Not reported in 2011.	
HR2	Suppliers and contractors that have undergone screening on human rights, and actions taken	Not reported in 2011.	
HR3	Total hours of employees training on policies and procedures concerning aspects of human rights that are relevant to operations	Not reported in 2011.	
ASPECT: NON-DISCRIMINATION			
HR4	Total number of incidents of discrimination and actions taken	No incidents of discrimination occurred at DNA in 2011.	

ASPECT: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING			
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk	DNA has not identified any business divisions where the right to exercise freedom of association and collective bargaining may be at risk. DNA respects employees' right to freedom of association and union representation in collective agreement negotiations.	
ASPECT: CHILD LABOUR			
HR6	Operations identified as bearing a significant risk of use of child labour, and actions taken	Not reported in 2011.	
ASPECT: FORCED AND COMPULSORY LABOUR			
HR7	Operations identified as bearing a significant risk of use of forced or compulsory labour, and actions taken	Not reported in 2011.	
ASPECT: SECURITY PRACTICES			
HR8	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations	Not reported in 2011.	
ASPECT: INDIGENOUS RIGHTS			
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken	Not reported in 2011.	
Society			
Social management approach		Not reported in 2011.	
Society Performance Indicators			
ASPECT: COMMUNITY			
S01	Programmes that assess and manage the impacts of operations on communities	Not reported in 2011.	
ASPECT: CORRUPTION			
S02	Percentage and total number of business units analysed for risks related to corruption	Not reported in 2011.	
S03	Percentage of employees trained in organisation's anti-corruption policies and procedures	Not reported in 2011.	
S04	Actions taken in response to incidents of corruption	There were no incidents of corruption at DNA in 2011.	
ASPECT: PUBLIC POLICY			
S05	Participation in public policy development and lobbying	DNA does not participate in politics, but states its opinions on proposed legislation or other important themes with an impact on DNA's operations. The company has prepared instructions for employees on how to interact with administrative public bodies. DNA's legal department maintains a list of the company's representatives on public working groups.	

S06	Total value of financial and in-kind contributions to political parties, politicians and related institutions by country	DNA Group does not support any political parties, politicians or similar institutions. According to this policy, DNA did not provide any financial and in-kind contributions to such parties in 2011.	●
ASPECT: ANTI-COMPETITIVE BEHAVIOUR			
S07	Total number of legal actions for anti-competitive behaviour, anti-trust and monopoly practices	DNA Ltd operates according to competitive regulations. During the reporting period, neither the Group nor any of its wholly-owned subsidiaries were subject to legal actions for anti-competitive behaviour, anti-trust and monopoly practices.	●
ASPECT: COMPLIANCE			
S08	Monetary value of fines and total number of non-monetary sanctions for non-compliance with laws and regulations	DNA has not been subject to any such fines or non-monetary sanctions.	●
Product Responsibility			
Product responsibility management approach		Not reported in 2011.	○
Product Responsibility Performance Indicators			
ASPECT: CUSTOMER HEALTH AND SAFETY			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed	Not reported in 2011.	○
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcome	Not reported in 2011.	○
ASPECT: PRODUCT AND SERVICE LABELLING			
PR3	Type of products and service information required by procedures, and percentage of products subject to such information requirements	Not reported in 2011.	○
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcome	Not reported in 2011.	○
PR5	Practices related to customer satisfaction and results of surveys measuring customer satisfaction	<u>EPSI rating results</u>	●

ASPECT: MARKETING COMMUNICATIONS			
PR6	Programmes for adherence to laws, standards and voluntary codes for marketing communications (including advertising and sponsorship)	As part of its operating principles, DNA Ltd adheres to laws related to marketing communications. When designing marketing communications, DNA Ltd takes account of the Consolidated ICC Code of Advertising and Marketing Communication Practice as well as other instructions applied on the Finnish market, such as the 'fair play' rules of the Finnish Direct Marketing Association. DNA Ltd marketing and legal departments work in cooperation to ensure the accuracy of marketing communications.	
PR7	Incidents of non-compliance with regulations and voluntary codes concerning marketing communications	The Finnish Market Court issued one ruling against DNA Ltd's marketing in 2011. DNA has since updated the relevant guidelines, and the Market Court did not order the payment of the conditional fine in 2011.	
ASPECT: CUSTOMER PRIVACY			
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Not reported in 2011.	
ASPECT: COMPLIANCE			
PR9	Monetary value of significant fines for non-compliance with regulations concerning the provision and use of products and services	DNA has not been ordered to pay any major fines for non-compliance with laws and regulations concerning the provision and use of products and services in 2011.	

Sources

EPSI Rating Customer Satisfaction (2011): [ICT satisfaction in Finland in 2011](#). Published on 24 October 2011. Referred 1 December 2011.

Official Statistics of Finland (OSF) (2009): [Population projection 2009–2060](#). ISSN=1798-5137. Helsinki: Statistics Finland. Referred 5 January 2012.

FICORA (2011): [Katsaus Viestintäviraston toimintaympäristöön 2012–2016](#) (in Finnish). Published on 14 December 2011.