



ANNUAL  
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# Corporate responsibility management at DNA

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 has made good progress in many aspects of corporate responsibility in 2012.



At DNA, corporate responsibility falls under the scope of the Board of Directors and the CEO; the Board discusses 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. DNA's corporate responsibility expert is responsible for the practical side of things, and reports to the management team quarterly.

DNA considers it important to recognise the social and environmental impacts of its business. To identify the relevant areas of its corporate responsibility, DNA conducted a comprehensive stakeholder survey in 2011. The focus areas of DNA's corporate responsibility were formulated based on the survey results:

#### Personnel:

- Employee well-being
- Flexible and pleasant working environment
- Remote work opportunities

#### Shareholders:

- Adhering to competitive regulations
- Profitable business operations

#### Customers:

- Responsibility for terminal usability
- Keeping promises, customer service

#### Partners:

- Payments to service and goods providers
- Working conditions and human rights of partners' and subcontractors' employees.

Based on the results of the stakeholder survey, DNA's corporate responsibility group designed a corporate responsibility programme for 2012–2014. It covers four areas: economic responsibility, society, human resources, and the environment and technology.

The table below lists the achievements in 2012 and target-setting for 2013. Focus areas in 2013 include responsible partnership, energy efficiency and environment as well as being a responsible employer.

Corporate responsibility objectives for 2012–2013

Target 2012	Actions	Status	Target 2013
Specification of corporate responsibility focus areas and metrics	- Specified with the corporate responsibility group	Ongoing, updated annually	Personnel: e.g. integrating diversity aspect in everyday leadership
Creation of a corporate responsibility programme for 2012–2014	- Created with the corporate responsibility group	Complete, updated annually	Energy efficiency and the environment: e.g. improving energy efficiency in production and facilities
The 'Responsible Partner' programme	- An Ethical Supplier Code added to all new technological and logistics contracts	Ongoing	Fostering responsible partnerships: e.g. integrating an Ethical Supplier Code to contracts, updating corporate responsibility guidelines
Development of GRI reporting	- Development areas: environmental responsibility and human rights - Verification of energy-efficiency calculations	Ongoing	Continuous development of GRI reporting

DNA considers it important to recognise the social and environmental impacts of its business.

# Corporate responsibility focus areas specified in cooperation with stakeholders

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 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. Participants also expressed a wish to see tangible and unambiguous corporate responsibility communication. They would like to see DNA use its website and emails for corporate responsibility communication.

## Different stakeholder groups identified specific needs

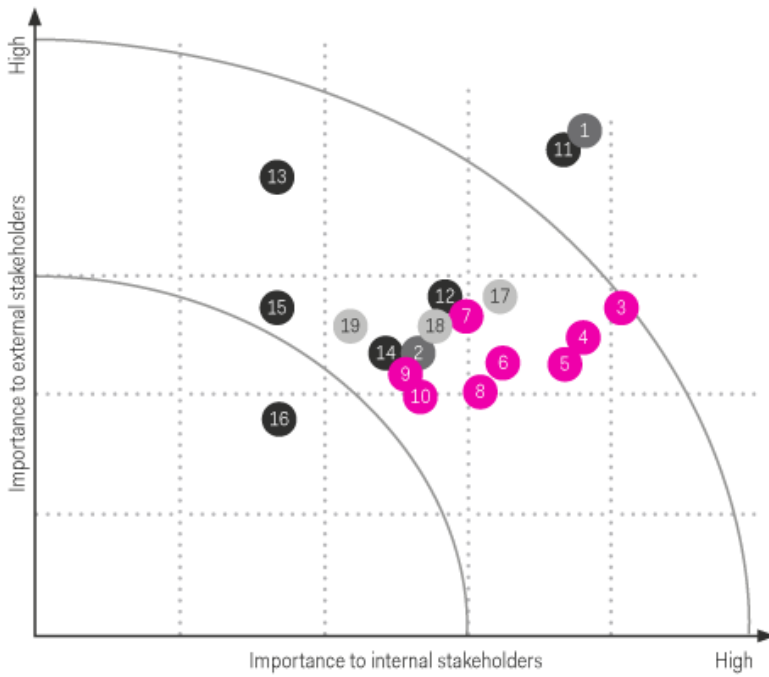
Based on the results of the survey, both external and internal stakeholders identified data security and network reliability as the most important aspects of DNA's corporate responsibility. They also valued investments in Finland, as well as the development of environmentally sound technological solutions.

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

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)

# 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 and good competitive ability are the cornerstones of economic responsibility and prerequisites for socially and environmentally sound business operations.

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.

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

DNA's investments in 2012 came to EUR 136.3 million (EUR 119.5 million in 2011), or 17.7 per cent of net sales (16.4). Major individual items included investments in the fibre and transfer systems and the 3G and 4G networks.

Close to 100 per cent of DNA's operations take place in Finland. At the end of 2012, the company employed directly 1,427 employees and indirectly some 1,000 more. The number of DNA personnel increased by some 392 employees towards the end of 2012. The Group's business initially grew as a result of 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.

2012 delivered both good and bad tidings as regards employment. In the spring of 2012, the company announced the initiation of cooperation negotiations to improve operational efficiency. As result of this restructuring, 57 DNA employees were made redundant.

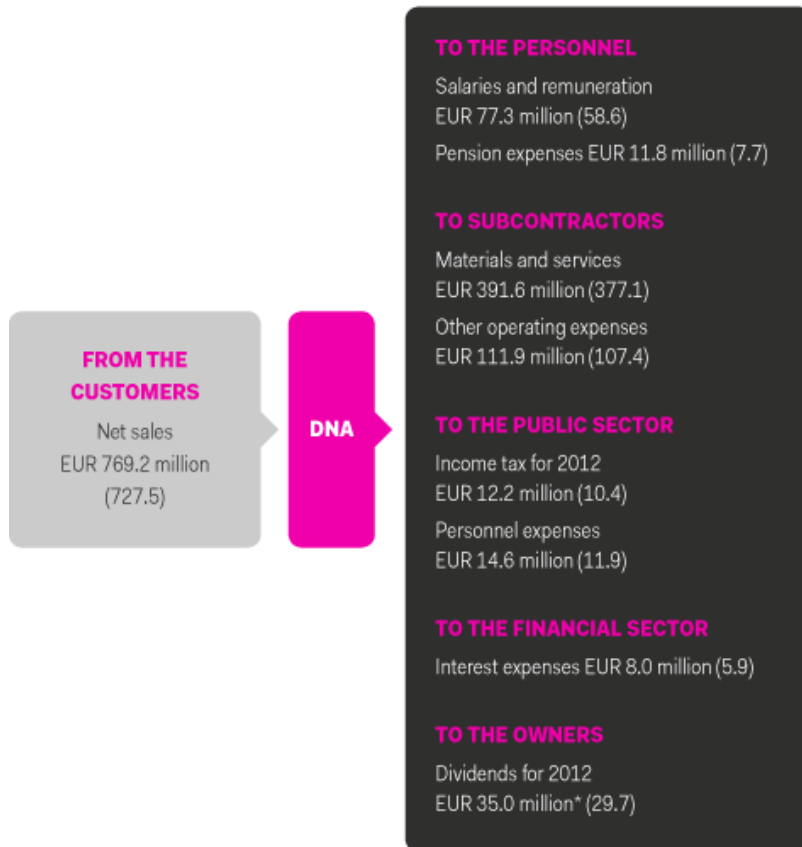
In July, DNA acquired a customer service entity from its outsourcing partner GoExcellent, increasing the number of employees by some 470. The business combination supports DNA's focus on customer service and cost efficiency.

In December, DNA announced that it will hire 40 new customer service employees at its Taivalkoski office during 2013, which will almost double the number of customer service personnel there. This decision is very important for employment in the municipality.

## Christmas came early in Taivalkoski

In December, DNA announced that it will hire new customer service employees at its Taivalkoski office, thus almost doubling the number of employees there.

## DNA's economic impact on its operating environment



\* The agenda of DNA's Annual General Meeting of 21 March 2013 includes a proposal to purchase the company's own shares. If the AGM will approve the proposal, it will be proposed to the AGM that the total amount of dividend is EUR 35.0 million, since no dividend will be paid on shares held by the company.

## 2012 was an eventful year



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 2012 brought about many changes for the personnel, the most important of which included reorganisation, acquisition of the customer service operations function, renewal of the working environment and an interlinked change in the working methods as the company moves towards a more genuine way of working. Successful implementation of these changes was supported by the positive development of employee satisfaction at all measured areas.

After the cooperation negotiations that were initiated in April 2012, DNA's matrix organisation was dismantled and replaced by a line organisation. The new organisation entered into force on 10 June 2012. The spirit of the negotiations was good and constructive, and the restructuring of operations reduced the number of personnel significantly less than anticipated.

DNA's customer service expertise was strengthened further as DNA and GoExcellent agreed on a business transfer on 1 July 2012. The number of DNA personnel increased by 470 employees who were transferred from the employ of GoExcellent to DNA. After the transfer, roughly every third DNA employee is a customer service specialist.

In August, most of the DNA staff in the Helsinki Metropolitan Area relocated to DNA's new premises in Käpylä. This also marked the launch of the Genuine method of working pilot project, which establishes a more flexible and independent way of working: using the mobile workspaces, the personnel decides independently where they work without discussing this with their supervisor.

According to DNA's HR vision, DNA is a company with future-oriented, skilled and motivated employees.



# Positive employee satisfaction development

The general index of the annual employee satisfaction survey remained high in 2012, at 4.4, the maximum being 6.0. The positive development has continued for several consecutive years. The general leadership index improved slightly and came to 4.7. Employees gave positive feedback in particular for the work of their immediate supervisors.

The survey indicates that DNA has skilled and committed employees who build a positive working atmosphere and team spirit. According to the survey feedback, employees value the ability to manage their work life balance by means such as the new Genuine working method.

The new DNA House that was completed in the autumn of 2012 received a lot of positive feedback, as did the support for employee well-being. The personnel also welcomed the organisational change introduced earlier in the year. The new organisation enables a quick and more streamlined way of doing business.

Development of facilities emerged as a key development area from the survey. To support the development, an increasing number of employees will soon be able to use facilities that have been designed according to DNA's new working environment concept also outside the Käpylä premises in Helsinki.

The new organisation enables a quick and more streamlined way of doing business.

## Personnel development and leadership coaching

In 2012, DNA organised the JET qualification programme in leadership training. Participants included DNA Store employees, and all those in leadership roles at DNA can apply for the training. Customer service management also worked towards a further qualification in sales.

In 2012, the company emphasised skills development as part of everyday leadership. Managers were supported by comprehensive internal online training material.

## Strong investments in well-being at work

DNA provides employees with a wide selection of healthcare services in excess of the level required by law. In 2012, the company continued to support the quit smoking campaign and implement the early response model. The model aims at systematic and long-term development of occupational well-being by addressing any problems as early as possible. It promotes the attitude of shared responsibility at the workplace, improves occupational safety and encourages and guides supervisors to address problems.

The popular well-being at work day was organised in the autumn of 2012. The event provided the employees tips for looking after their health and maintaining their working capacity.

In 2012, DNA supported the employees' awareness of the importance of office ergonomics in cooperation with occupational health services. Information sessions were organised at different facilities and information was also shared via the Intranet and the company magazine.

The DNA Liikkuu ('DNA Moves') card was launched in 2012. DNA offers targeted exercise campaigns in cooperation with a partner. In 2012, DNA organised a swimming and running technique course for adults, supporting employees in their training for a fun company marathon. Personnel clubs remained active at all DNA facilities.

DNA Peers organised various fun events in different locations. The Peers are volunteers who guide their fellow employees and share information with them, organising events and surprises to build team spirit at DNA premises.

## Responsible employer

DNA was among the first signatories of the diversity commitment with 17 other companies at the event organised by the leading corporate responsibility network in Finland, FIBS, to mark the launch of Diversity Charter Finland.

## Type of employment contract

Type of employment contract	2012*	2011	2010
Open-ended	1,403	1,015	955
Fixed-term	24	20	48
Total	1,427	1,035	1,003

\* Includes GoExcellent as of 1 July 2012.

## Type of employment

Type of employment	2012*	2011	2010
Full-time	1336	997	963
Part-time	91	38	40
Total	1,427	1,035	1,003

\* Includes GoExcellent as of 1 July 2012.

## Gender structure

By gender	2012*	2011	2010
Women	611	333	318
Men	816	702	685
Total	1,427	1,035	1,003

\* Includes GoExcellent as of 1 July 2012.

## Age structure

By age group	2012*	2011	2010
< 25	6%	3%	
25–34	31%	27%	34%
35–44	31%	37%	34%
45–54	23%	25%	24%
55–64	9%	8%	7%
Total	100%	100%	100%

\* Includes GoExcellent as of 1 July 2012.

## Share of women (%) per personnel group\*

Personnel groups include women as follows:

Of management	25%
Of managerial employees	25%
Of administrative employees	36%
Of service and production employees	15%

\* Does not include GoExcellent.

## 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.

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 our customers' opinions, expectations and values. DNA also has an active presence in the social media, in Facebook for example. Towards the end of 2012, DNA opened a customer service channel in the Twitter microblogging service.

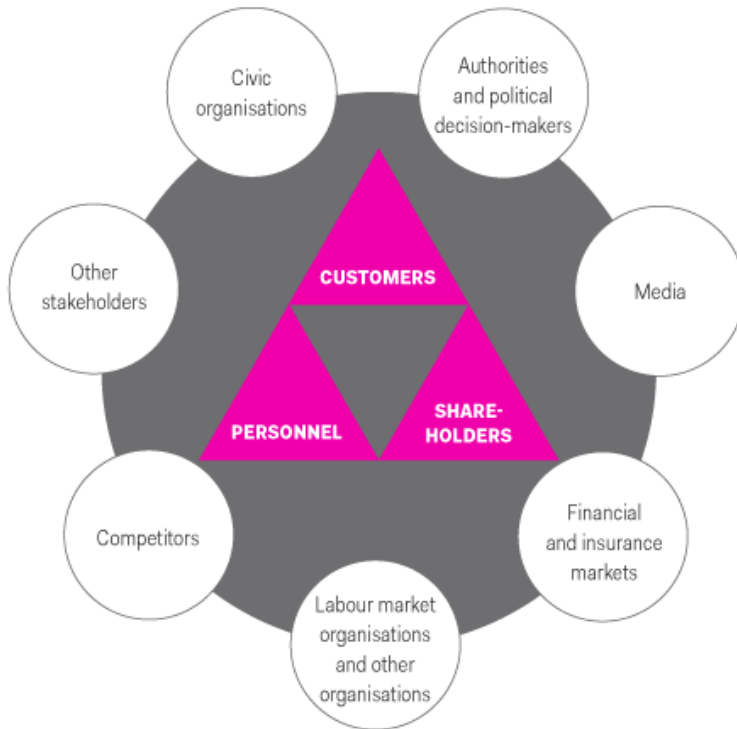
DNA is also an active participant in the work of associations and trade organisations, as well as in developing the industry and safeguarding its interests. DNA engages in active communication with various authorities and political decision-makers and is a member of various associations, including the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

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 services offered by ICT companies, in order to help other sectors improve their energy efficiency.

DNA also engages in active discussion with non-governmental organisations. Finnwatch published a [report](#) on the responsibility of teleoperators, according to which the companies have progressed, but there is still room for improvement. Finnwatch studied the operators' subcontractors' ethical guidelines and monitoring thereof, reuse and recycling of terminals as well as customer privacy and disclosure of data. DNA considers the contents of the Finnwatch report very important. The company has reviewed the operator-specific recommendations included in the report in areas such as human rights.

In the summer of 2012, Greenpeace reviewed the energy efficiency of the cloud services provided by IT companies in Finland. The report will be published in the spring of 2013. DNA was an active participant in the review.

## Stakeholder map



### DNA has the most satisfied mobile broadband customers in Finland

According to the international EPSI Rating study, DNA mobile broadband and DNA WELHO pay-TV had the most satisfied customers in 2012. DNA's mobile broadband was strong across the board: its service quality is considered the best, and customer value and loyalty are also at the highest level. DNA WELHO remained number one on the pay-TV market, scoring top position in both product quality and image as in 2011.

Corporate customers' satisfaction with DNA's mobile services increased somewhat year-on-year. Satisfaction with service quality in particular improved from 2011. However, satisfaction among mobile consumer customers fell from the previous year.

DNA WELHO was a strong number two in fixed-network broadband services. Finnish consumers' satisfaction with fixed-network services increased notably year-on-year.

## Customer satisfaction

Results of the EPSI Rating study, DNA and DNA WELHO*	2012	2011	2010
Mobile communication services for consumers (DNA)	72.9	73.8	73.6
Broadband services for consumers (DNA)	-	-	65.4
Broadband services for consumers (DNA WELHO)	71.9	69.4	-
Mobile communication services for corporations (DNA)	65.7	65.3	66.7
Broadband services for corporations (DNA)	65.8	65.8	64.3
Pay-TV (DNA WELHO)	71.3	67.4	-

\*Information on DNA WELHO available since 2011

### Second year of cooperation with SOS Children's Village



In October 2011, a child protection service provider, SOS Children's Village Association Finland, and DNA Ltd agreed on three-year 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. The mission of the association is to help children who are without parental security, or who are in danger of losing their parents.

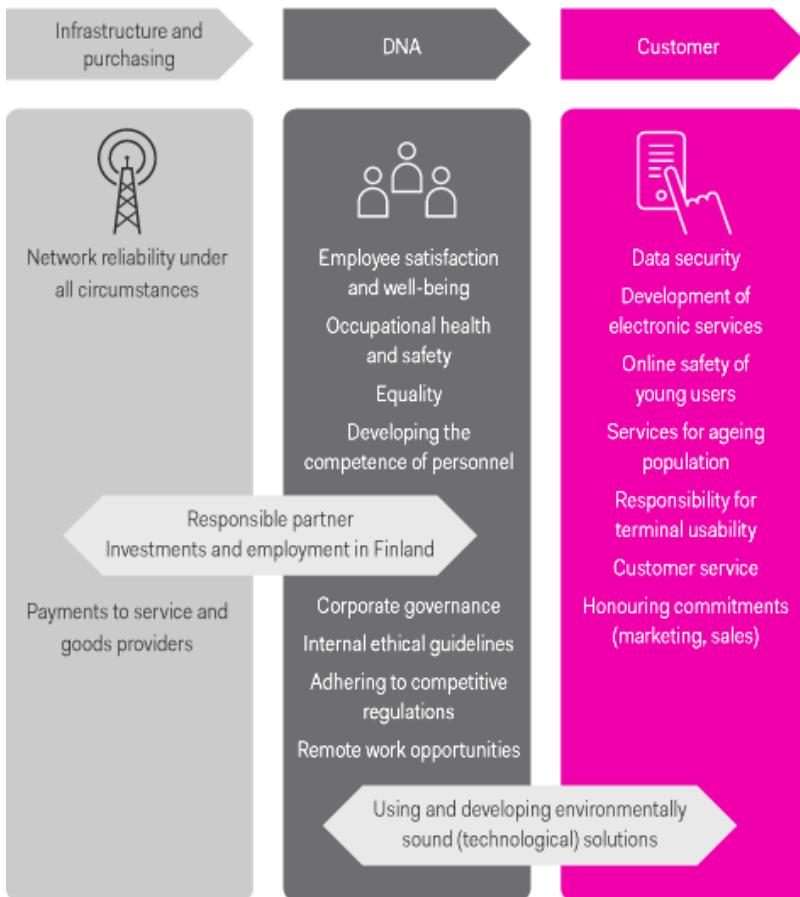
# Responsible partnership

Responsible partnership was a key development area for DNA in 2012, and has also been included in the focus areas for 2013. 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. Corporate responsibility considerations are increasingly emphasised when entering into new purchase and cooperation agreements with partners.

As a responsible partner, DNA also expects its partners to take economic, environmental and social responsibility increasingly into consideration in their operations. In 2012, DNA placed special emphasis on supply chain management and ethical supplier guidelines. As of 2012, an Ethical Supplier Code has been added to all new technological and logistics contracts. The appendix is based on the UN Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work and also covers environmental responsibility considerations. The appendix also applies to the suppliers' subcontractors.

DNA's ethical principles apply to every DNA employee. They outline the Group's values as well as operating methods and also specify communication channels and actions to be taken when questions arise.

## Corporate responsibility value chain



### Responsible recycling with Kuusakoski

DNA continued the modernisation of its radio network in 2012, implementing next-generation base stations. The company wanted to make sure that the old, decommissioned base stations were recycled by a responsible, domestic partner.

## Environmentally friendly solutions



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 that help reduce work-related travel.

DNA complies with current environmental legislation and expects the same from its subcontractors and partners.

| We develop environmentally sound and advanced technologies.

### Energy-efficient DNA House

Towards the end of the summer 2012, DNA's headquarters relocated to DNA's new premises in Käpylä, Helsinki. The facilities were constructed by YIT according to its Energy genius concept. In the concept, energy-efficiency of offices is carefully considered already at the design and construction phase. This helps cut energy costs in comparison to standard offices. YIT is seeking an international LEED Gold certification for the sustainability of the Käpylä premises.

In connection with the relocation to the new premises, DNA launched a Genuine method of working pilot project with mobile workspaces. The personnel decides independently where they work without discussing this with their supervisor. According to a survey conducted among the pilot participants, work-related travel emissions were cut by 15 per cent during the project (on an annual level, this translates to 39 per cent when compared with the pre-pilot situation). The company supports mobile working and leverages solutions, such as phone and video conferencing, that help reduce the need to travel. The Genuine method of working will continue in 2013.

DNA emphasises the durability, life cycle and recovery of materials when making purchasing decisions. Materials are recycled and waste is sorted at the company's sites and retail outlets. DNA continued to develop its facilities according to the working environment concept in 2012. As part of the project, many locations relocated, cleaned up and emptied old storage facilities. Responsible recycling was a key consideration during the relocation and cleaning: the amount of landfill waste was minimised by recycling and reusing as much of the material as possible.

The company achieved many tangible, environmentally responsible milestones in 2012:

- Supporting remote working and avoiding work-related travel by using telephone and video conferencing;
- The CO<sub>2</sub> emission limit of company cars was lowered to 140 g/km;
- Mapping the possibility of using renewable sources of energy in power generation for DNA's network, such as the possibility of using wind power at the Lohja mast location;



- Developing electronic services, by e.g. encouraging consumer customers to switch to electronic billing;
- Training personnel to be more energy efficient: using computers' sleep and print settings, switching off lights (Earth Day campaign), energy-efficient travel, reduced paper consumption;
- DNA participated in the annual Energy Saving Week, distributing information and energy saving tips for home and office use;
- The company created innovative solutions, such as integration of 2G, 3G and 4G base station systems and relocating the radio units from the equipment facilities to the masts;
- The 'Vempaimet vaihtoon' recycling campaign at DNA Stores;
- Active representation in key industry associations, such as FiCom's Green ICT working group.

### DNA participates in the swim to protect Lake Vesijärvi



In August 2012, 13 brave swimmers gathered at the Lahti harbour and at the starting pistol sound, they were off to swim 5.1 kilometres in Lake Vesijärvi. They participated in the first 'Mega Enonsaari Challenge' event organised by the triathlon association X-tri Lahti and the Lake Vesijärvi Foundation.

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

	2012*	2011	2010
Consumption of own vehicles (diesel, petrol)	approx. 6.34	approx. 5.83	approx. 5.07
Other fuel	approx. 1.61	approx. 0.89	approx. 1.29

\* The energy consumption calculation principles have been adjusted in 2012. Due to this, the figures for 2011 and 2012 are not entirely comparable.

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

	2012*	2011	2010
District heating	19	29	14
Electricity	346	398	335

\* The energy consumption calculation principles have been adjusted in 2012. Due to this, the figures for 2011 and 2012 are not entirely comparable.

### EN16 – Total direct and indirect greenhouse gas emissions by weight (tCO<sub>2</sub>)

	2012	2011
Scope 1	211	138
Scope 2	41,479	45,766

### EN17 – Other relevant indirect gas emissions by weight (tCO<sub>2</sub>)

	2012	2011
Scope 3, business travel	721	934

## EN22 – Total weight of waste by type and disposal method (tonnes)

Year 2012*	Weight (tonnes)
Total**	716.7
of which hazardous waste	14.1
of which WEEE (waste electrical and electronic equipment)	269.4
Average waste recycling and utilising rate***	87%

\* The calculation and reporting methods of waste have been adjusted during 2012. Due to this, the figures are not entirely comparable with those reported for earlier years.

\*\* The 2012 figures include waste generated during the facility relocation and storage facility clean up processes. The total amount of waste is thus higher than during a standard year. Responsible recycling of office furniture and other goods was a key consideration during the relocation and cleaning of facilities.

\*\*\*Based on weighted average.

## Energy consumption in focus

DNA also continued to develop its operational energy efficiency during 2012 by means such as upgrading the radio network technologies and mapping the possibility of using renewable sources of energy in power generation for DNA's network. The company also initiated a project in which a third party verified the calculation methods and accuracy of DNA's energy consumption calculations.

As part of a more detailed inventory of energy consumption, DNA initiated the calculation of its carbon dioxide emissions. The calculations are made according to the Greenhouse Gas Protocol Corporate Standard framework, a standard method for the inventory and reporting of emissions. Service production is responsible for a significant portion of DNA's carbon dioxide emissions.

DNA continued the modernisation of its radio network in 2012, implementing next-generation base stations. The new system requires fewer devices, thereby reducing relative energy consumption. At an annual level, the new base station technologies transfer 3G data with 40 per cent less energy than base stations that use the old technology. During the network upgrade, hundreds of radio units have been relocated from inside the equipment facilities to the masts, omitting the need for mechanical cooling. This translates into significant energy savings.

Data traffic volumes are continuously increasing. To meet this demand, the number of devices must be increased, which will in turn increase absolute energy consumption. The growth trend was evident in 2012, as the volume of mobile data in DNA's network has more than doubled since 2011.

The high-speed 4G LTE technologies reduces the relative per-data energy consumption through improved technical performance of the base station equipment.

DNA is also using existing mobile network masts to construct its terrestrial TV broadcasting networks energy-efficiently, while its broadcasts benefit from efficient use of frequencies. In 2011, DNA's innovative terrestrial broadcast network was awarded at the annual IBC Awards Ceremony, the premier annual event for television and broadcasting professionals worldwide.

We are mapping the possibility of using renewable sources of energy.

# DNA and the society

DNA provides and maintains infrastructure that is critical to the operation of the society. The company needs to act as a reliable partner that develops, provides and maintains services to the modern information society. As a responsible operator, DNA considers the changing service needs of the society, such as the special needs of ageing population. DNA also considers it important to guide young users on the safe use of the Internet and mobile phones.

Click the image below to read how the DNA community works.



## 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 Elämysraportti" report 2011).

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, such as remote work and web meetings. Corporate customers can avail of DNA's mobile exchange 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 2012, the company invested, in particular, in supply chain management.

DNA's corporate responsibility group has specified responsible partnerships as a key development area also in 2013. 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.

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 80 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 vital 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. DNA continued the modernisation of its radio network in 2012, implementing next-generation base stations. The new base station technologies transfer 3G data with 40 per cent less energy than base stations that use the 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. 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 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 the autumn of 2012, DNA joined the Innolukio project launched by the National Board of Education. The project aims to build a learning environment that encourages upper secondary school students towards creative thinking. This aim is supported by an idea and product development competition for the students, based on changing tasks issued by the project partners. One of the key aims of the Innolukio project is to promote the use of ICT and mobile phone technologies in the learning environment.

In October 2011, DNA and SOS Children's Village Association Finland agreed on three-year 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 assistance was directed towards Theraplay therapy activities. In 2012, the assistance was directed at preventive family-friendly and family-based care. DNA's employees also support the Association's fund collection activities by volunteering.

As a responsible operator, DNA considers the changing service needs of the society, such as the special needs of ageing population.

Sources (in Finnish):

DNA Suomalaiset ja viihde 2011 survey, FiCom ry's Toimialakatsaus 2011 (referred <http://www.ficom.fi/toimialakatsaus/index.html>)

# Reporting according to GRI guidelines

In 2012, DNA Ltd continued to report on corporate responsibility according to the Global Reporting Initiative (GRI) 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 8 March 2012. The report at hand is the company's third GRI report. All the reports follow the Global Reporting Initiative's G3 (GRI version 3.1) guidelines.

DNA's corporate responsibility reporting is based on the guidelines, principles and calculation methods specified by GRI. The reporting includes DNA Ltd, DNA Store Ltd and Forte Netservices Oy. In early July, DNA acquired a customer service entity from an outsourcing partner GoExcellent. GoExcellent is included in the figures reported for economic and environmental responsibility and also in most of the social responsibility indicators. Any deviations from or changes to the calculation limits are mentioned with each key figure. Similarly, any changes in measurement technologies are mentioned with each figure.

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 survey among its main stakeholders towards the end of 2011; for more information on materiality, see [Corporate responsibility management at DNA](#).

DNA increased the scope of its reporting in 2012 by reporting on the GHC protocol figures under environmental responsibility. Three new governance indicators were also included, as well as two new human rights indicators. The energy consumption indicators included into DNA's GRI report for 2012 have been verified by an external party.

These indicators have been reviewed by the Board of Director's Audit Committee. DNA's corporate responsibility group reviews and expands the reporting scope annually.

## Contact information

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

At the Executive Team level, CFO Timo Karppinen is in charge of corporate responsibility, .

## Sources

EPSI Rating Customer Satisfaction (2012): [Cellular phone satisfaction in Finland 2012](#) (in Finnish). Published 22 October 2012. Referred 7 December 2012.

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

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

# GRI Content Index

- Fully reported
- Partly reported
- Not reported

GRI	Indicator	Reference	Status of reporting
<b>1. Strategy and Analysis</b>			
1.1	Statement from the most senior decision maker in the organisation	<a href="#">CEO's review</a>	●
1.2	Description of key impacts, risks and opportunities	<a href="#">CEO's review</a> ; <a href="#">Operating environment</a> ; <a href="#">Strategy</a> ; <a href="#">Board of Director's report</a>	●
<b>2. Organisational Profile</b>			
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	<a href="#">DNA in brief</a> ; <a href="#">Events in 2012</a> . See also the following notes to the consolidated financial statements: notes 18 <a href="#">Investments in associates</a> and 34 <a href="#">Related party transactions</a> .	●
2.4	Location of organisation's headquarters	Consolidated financial statements: note 1 <a href="#">The Group in brief</a> .	●
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 notes to the consolidated financial statements, 34 <a href="#">Related party transactions</a> .	●
2.6	Nature of ownership and legal form	<a href="#">DNA if figures</a> . See also the note to the consolidated financial statements 36 <a href="#">Shares and shareholders</a> .	●
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 <a href="#">Related party transactions</a> .	●
2.8	Scale of the organisation	<a href="#">DNA in figures</a> , <a href="#">DNA in brief</a>	●
2.9	Significant changes during the reporting period regarding size, structure or ownership	<a href="#">Year 2012</a> ; <a href="#">Board of Directors' report</a>	●
2.10	Awards received in the reporting period	DNA did not receive any awards in the reporting period.	●
<b>3. Report Parameters</b>			
<b>REPORT PROFILE</b>			
3.1	Reporting period	The GRI report is published annually with the Annual Report.	●
3.2	Date of the most recent previous report	The previous report was published on 8 March 2012.	●
3.3	Reporting cycle	Annually	●
3.4	Contact point for questions regarding the report	<a href="#">Reporting</a>	●



**REPORT SCOPE AND BOUNDARY**

3.5	Process for defining report content (determining materiality, prioritising topics, identifying stakeholders expected to use the report)	<a href="#">Reporting</a>	●
3.6	Boundary of the report	<a href="#">Reporting</a>	●
3.7	Specific limitations on the scope or boundary of the report	<a href="#">Reporting</a>	●
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities and outsourced entities	<a href="#">Reporting</a>	●
3.9	Data measurement techniques and calculation principles	<a href="#">Reporting</a>	ⓘ
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. See <a href="#">Reporting</a> .	●
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. See <a href="#">Reporting</a> .	●

**GRI INDEX**

3.12	Table identifying the location of the Standard Disclosures in the report (identifying links to relevant pages).	<a href="#">GRI Content index</a>	●
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**ASSURANCE**

3.13	Policy and current practice with regard to seeking external assurance for the report	The energy consumption calculations in DNA's corporate responsibility report have been subject to external <a href="#">assurance</a> .	ⓘ
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**4. Governance, Commitments and Engagement**

**GOVERNANCE**

4.1	Governance structure of the organisation	<a href="#">Governance</a>	●
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. See <a href="#">Board of Directors</a> and <a href="#">Members of the Board of Directors</a> .	●
4.3	Independent and/or non-executive board members	<a href="#">Members of the Board of Directors</a>	●
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. See <a href="#">Corporate governance and internal control</a> .	●
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 see the following notes to the consolidated financial statements: 15 <a href="#">Earnings per share</a> and 10 <a href="#">Employment benefits and number of personnel</a> .	ⓘ
4.6	Processes in place for the highest governance body, to ensure conflicts of interest are avoided	As stipulated by law, a member of the Board of Directors shall be disqualified from the consideration of a matter that involves a conflict of interest. For more information, see <a href="#">Board of Directors</a> .	●
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. See <a href="#">Members of the Board of Directors</a> .	●

4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental and social performance	<a href="#">Corporate responsibility management at DNA and Responsible partnership.</a>	
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. See <a href="#">Board of Directors</a> .	
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. See <a href="#">Board of Directors</a> .	
<b>COMMITMENTS TO EXTERNAL INITIATIVES</b>			
4.11	Explanation of whether and how the precautionary principle is applied	<a href="#">Risks and risk management</a>	
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 as well as the European Framework for Safer Mobile Use by Younger Teenagers and Children. In 2012, DNA signed the diversity commitment and joined Diversity Charter Finland.	
4.13	Memberships in associations and advocacy organisations	DNA's main memberships: Service Sector Employers PALTA, GSM Association, European Competitive Telecommunications Association (ECTA) and Diversity Charter Finland. For more details on DNA's memberships, see <a href="#">Stakeholders</a> .	
<b>STAKEHOLDER ENGAGEMENT</b>			
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 <a href="#">Stakeholders</a> .	
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 <a href="#">Stakeholders</a> .	
4.16	Approaches to stakeholder engagement	<a href="#">Stakeholders</a>	
4.17	Key topics and concerns that have been raised through stakeholder engagement	<a href="#">Stakeholders</a>	
<b>5. Management Approach and Performance Indicators</b>			
<b>Economic</b>			
Disclosure of Management Approach		<a href="#">Economic responsibility</a>	
Economic Performance Indicators			
<b>ASPECT: ECONOMIC PERFORMANCE</b>			
EC1	Direct economic value generated and distributed	<a href="#">DNA's economic impact on its operating environment</a> . For more information, see <a href="#">consolidated income statement</a> .	
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change	Not reported in 2012.	
EC3	Coverage of the organisation's defined benefit plan obligations	Notes to the consolidated financial statements: notes 2 <a href="#">Accounting principles</a> and 26 <a href="#">Defined benefit plan</a> .	
EC4	Significant financial assistance received from government	DNA received no significant financial assistance from government or other administrative public bodies in 2012.	
<b>ASPECT: MARKET PRESENCE</b>			
EC5	Range of ratios of standard entry level wage to local minimum wage at significant locations	Not reported in 2012.	
EC6	Proportion of spending on locally based suppliers	Not reported in 2012.	
EC7	Local hiring	Not reported in 2012.	

**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	<a href="#">Economic responsibility</a> ; <a href="#">Network infrastructure</a>	🟡
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts	Not reported in 2012.	🟠

**Environmental**

Disclosure of Management Approach	<a href="#">Environmental responsibility</a>	🟡
Environmental Performance Indicators		

**ASPECT: MATERIALS**

EN1	Materials used by weight or volume	Not reported in 2012.	🟠
EN2	Percentage of materials used that are recycled input materials	Not reported in 2012.	🟠

**ASPECT: ENERGY**

EN3	Direct energy consumption by primary energy source	<a href="#">Environmental responsibility</a>	🟡
EN4	Indirect energy consumption by primary energy source	<a href="#">Environmental responsibility</a>	🟡
EN5	Energy saved due to conservation and efficiency improvements	DNA participated in the annual Energy Saving Week in the autumn of 2012, distributing information and energy saving tips for office and home use. See also <a href="#">Environmentally friendly solutions</a> .	🟡
EN6	Initiatives to provide energy-efficient or renewable energy based products and services	<a href="#">Energy consumption</a>	🟡
EN7	Initiatives to reduce indirect energy consumption and reductions achieved	Towards the end of the summer 2012, DNA's headquarters relocated to DNA's new premises in Käpylä, Helsinki. The facilities were constructed by YIT according to its Energy genius concept, which cuts energy consumption. See <a href="#">Environmentally friendly solutions</a> .	🟡

**ASPECT: WATER**

EN8	Total water withdrawal by source	Not reported in 2012.	🟠
EN9	Water sources significantly affected by withdrawal of water	Not reported in 2012.	🟠
EN10	Percentage and total volume of water recycled and reused	Not reported in 2012.	🟠

**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 2012.	🟠
EN13	Habitats protected or restored	Not reported in 2012.	🟠
EN14	Strategies, current actions and future plans for managing impacts on biodiversity	Not reported in 2012.	🟠
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 2012.	🟠

**ASPECT: EMISIONS, EFFLUENTS AND WASTE**

EN16	Total direct and indirect greenhouse gas emissions	<u>Environmental responsibility</u>	●
EN17	Other relevant indirect greenhouse gas emissions	<u>Environmental responsibility</u>	●
EN18	Initiatives to reduce greenhouse gas emissions	In 2012, DNA launched a Genuine method of working pilot with mobile workspaces for personnel in the company's new headquarters. As a result, CO2 emissions decreased by 15 per cent from the comparable period. See <u>Environmentally friendly solutions</u> .	●
EN19	Emissions of ozone-depleting substances	Not reported in 2012.	○
EN20	NO, SO, and other significant air emissions by type	Not reported in 2012.	○
EN21	Total water discharge	Not reported in 2012.	○
EN22	Total weight of waste by type and disposal method	<u>Environmental responsibility</u>	●
EN23	Total number and volume of significant spills	Not reported in 2012.	○
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous	Not reported in 2012.	○
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 2012.	○

**ASPECT: PRODUCTS AND SERVICES**

EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation	<u>Environmental responsibility</u>	●
EN27	Percentage of products sold and their packaging materials that are reclaimed by category	Not reported in 2012.	○

**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 2012.	○

**ASPECT: SUMMARY**

EN30	Total environmental protection expenditures and investments by type	Not reported in 2012.	○
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**Social Performance Indicators**

HR Management Approach	<u>Social responsibility</u>	●
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**Social Performance Indicators**
**ASPECT: EMPLOYMENT**

LA1	Total workforce by employment type, employment contract, and region	<u>Social responsibility</u>	●
LA2	Rate of employee turnover by age group, gender and region	DNA Group's rate of employee turnover was 9.9 per cent in 2012 (the 10.0 per cent turnover rate reported in 2011 was the rate of resignations). The figure does not include GoExcellent, 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 Store Ltd and Forte Netservices Oy apply to all 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. Forte Netservices staff are covered by the collective agreement for the Federation of Special Service and Clerical Employees ERTO.



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, including a DNA Store delegate, and the labour protection officer. The committee has quarterly meetings. Forte Netservices Oy has its own labour protection committee, the members of which include the labour protection delegate, two deputy delegates and the labour protection officer. The committee meets twice a year.



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 3.9 per cent in 2012 (3.4 per cent in 2011). There were no work-related fatalities. There were 28 work time injuries (19 in 2011) and 113 working days were lost due to work-related reasons (136 in 2011). More than half 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 at 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. Forte Netservices Oy has a healthcare service agreement with Diacor Oy and Suomen Terveystalo.



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. Forte's labour protection committee (2012–2014) has one labour protection delegate, two deputy delegates and the labour protection officer. The committee meets twice a year. A typical agenda includes reviewing change items such as employee benefits and operating models, as well as reviewing any employee feedback to the labour protection delegate.



**ASPECT: TRAINING**

LA10	Average hours of training per year per employee	Average hours of training/employee in 2012 (DNA Ltd, not reported for DNA Store): Senior salaried employees 30.8 Salaried employees 22.5 Workers 19.3 Average/person 17.9. Forte Netservices Oy 34.4 (all employees are salaried employees).	D
LA11	Programmes for skills management and lifelong learning that support employees' career development	DNA Ltd currently organises leadership coaching. Participants in the JET qualification programme in leadership training include participants from DNA Store Ltd (two JET groups, total of some 30 participants). There have been three previous JET groups, with some 45 participants. Managers are supported by comprehensive internal online training material. It is used in the training of new managers and also serves as useful reference material for experienced managers. DNA plans to organise four events for supervisors in 2013. Two groups from DNA Store Ltd are about to complete the qualification programme in store supervision (a total of some 30 participants). DNA customer service management employees worked towards a further qualification in sales (a total of some 15 participants). Competence development featured actively in performance reviews and everyday supervision during the year. For more information, see <a href="#">Personnel</a> .	D
LA12	Percentage of employees receiving regular performance and career development reviews	DNA Ltd and Forte Netservices Oy 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.	D

**ASPECT: DIVERSITY AND EQUAL OPPORTUNITY**

LA13	Composition of governance bodies and employees according to diversity indicators	In early 2012, two of the eight members of DNA's Board of Directors were women. There Annual General Meeting of 15 March 2012 introduced some changes, after which one of the six members of DNA's Board of Directors was a woman. In early 2012, three of the eleven members of the Executive Team were women. Changes were introduced on 7 June 2012, after which two of the seven members of the Executive Team were women. The Acting CFO from 28 June to 30 November 2012 was a woman. For more information, see <a href="#">Personnel</a> .	D
LA14	Ratio of basic salary of men to women by employee category	Not reported in 2012.	O

**Human Rights**

Human rights Management Approach	Not reported in 2012.	O
Human Rights Performance Indicators		

**ASPECT: INVESTMENT AND PROCUREMENT PRACTICES**

HR1	Investment agreements that include human rights clauses	Not reported in 2012.	O
HR2	Suppliers and contractors that have undergone screening on human rights, and actions taken	In 2012, DNA introduced an Ethical Supplier Code to all new technological and logistics contracts. See <a href="#">Responsible partnership</a> .	D
HR3	Total hours of employees training on policies and procedures concerning aspects of human rights that are relevant to operations	DNA's Group-level ethical principles build on DNA's standard operating practices, including the consideration of equality and non-discrimination at all times. Personnel receives regular training on ethical principles and the principles apply throughout the organisation. See <a href="#">Responsible</a>	D

<u>partnership.</u>			
<b>ASPECT: NON-DISCRIMINATION</b>			
HR4	Total number of incidents of discrimination and actions taken	No incidents of discrimination occurred at DNA in 2012.	●
<b>ASPECT: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING</b>			
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.	●
<b>ASPECT: CHILD LABOUR</b>			
HR6	Operations identified as bearing a significant risk of use of child labour, and actions taken	Not reported in 2012.	○
<b>ASPECT: FORCED AND COMPULSORY LABOUR</b>			
HR7	Operations identified as bearing a significant risk of use of forced or compulsory labour, and actions taken	Not reported in 2012.	○
<b>ASPECT: SECURITY PRACTICES</b>			
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 2012.	○
<b>ASPECT: INDIGENOUS RIGHTS</b>			
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken	Not reported in 2012.	○
<b>Society</b>			
Social Management Approach		<u>DNA and the society</u>	●
Society Performance Indicators			
<b>ASPECT: COMMUNITY</b>			
SO1	Programmes that assess and manage the impacts of operations on communities	Not reported in 2012.	○
<b>ASPECT: CORRUPTION</b>			
SO2	Percentage and total number of business units analysed for risks related to corruption	Not reported in 2012.	○
SO3	Percentage of employees trained in organisation's anti-corruption policies and procedures	DNA's corporate responsibility specialist has trained DNA personnel in DNA Group's anti-corruption policies and procedures. The Group's ethical principles have been implemented in practice throughout the organisation, including guidelines related to corruption. See <u>Responsible partnership.</u>	●
SO4	Actions taken in response to incidents of corruption	There were no incidents of corruption at DNA in 2012.	●
<b>ASPECT: PUBLIC POLICY</b>			
SO5	Participation in public policy development and lobbying	DNA is an active participant in the development of the Finnish information society by stating its opinions on proposed legislation 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.	●
SO6	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 2012.	●

**ASPECT: ANTI-COMPETITIVE BEHAVIOUR**

SO7	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.	●
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**ASPECT: COMPLIANCE**

SO8	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.	●
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**Product Responsibility**

Product responsibility Management Approach	Not reported in 2012.	○
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**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 2012.	○
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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 2012.	○
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**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 2012.	○
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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 2012.	○
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PR5	Practices related to customer satisfaction and results of surveys measuring customer satisfaction	EPSI rating results, see <a href="#">Stakeholders</a> .	●
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**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.	●
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PR7	Incidents of non-compliance with regulations and voluntary codes concerning marketing communications	No rulings were issued against DNA Ltd's marketing in 2012, nor was DNA subject to any conditional fines ordered by the Finnish Market Court.	●
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**ASPECT: CUSTOMER PRIVACY**

PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Not reported in 2012.	○
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**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 2012.	●
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