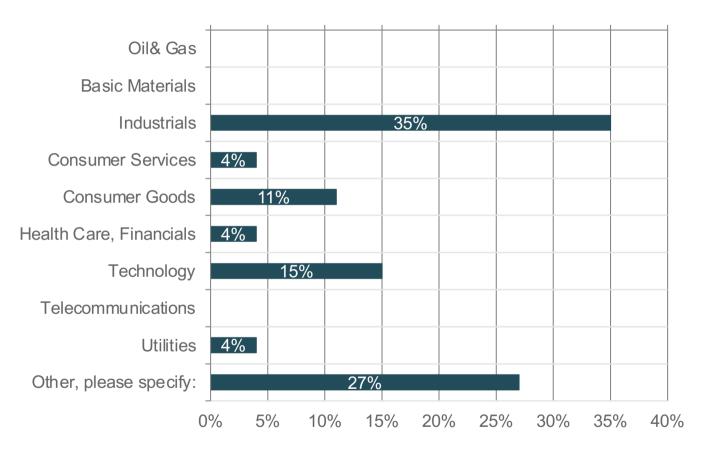
Survey on ESEF (European Single Electronic Format) financial reporting requirements (xHTML and iXBRL), May 2022

Survey

- The survey was conducted in collaboration between Aalto University School of Business, XBRL Finland and the Finnish Financial Supervisory Authority.
- The aim of the survey was to probe the current state of XBRL implementation in Finnish issuers that are impacted by the ESEF reporting requirements. This survey is a follow-up survey to similar studies made in April 2021, April 2020 and April 2019. The survey included background questions, questions on the current stage of implementation, questions concerning the choice of deployment model, and questions on issuers' opinions regarding XBRL and the ESEF reporting requirements.
- The survey was conducted in May 2022. The survey was sent to 145 Finnish issuers and 26 responses were received, yielding a response rate of 18%.
- The following slides report the findings of the survey and make a comparison between the responses given by the issuers in 2019, 2020, 2021, and 2022.
- The survey was administered by Esko Penttinen from Aalto University (esko.penttinen@aalto.fi).

1. In what industry does your company operate in?

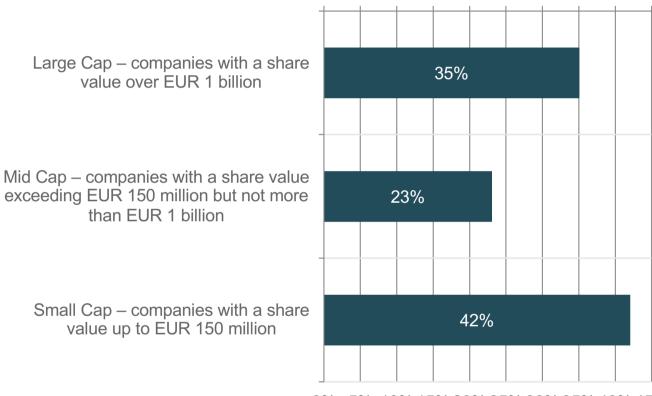


1. In what industry does your company operate in?

| | n | Prosentti |
|-------------------------|---|-----------|
| Oil& Gas | 0 | 0,0% |
| Basic Materials | 0 | 0,0% |
| Industrials | 9 | 34,6% |
| Consumer Services | 1 | 3,9% |
| Consumer Goods | 3 | 11,5% |
| Health Care, Financials | 1 | 3,9% |
| Technology | 4 | 15,4% |
| Telecommunications | 0 | 0,0% |
| Utilities | 1 | 3,8% |
| Other, please specify: | 7 | 26,9% |

2. In what segment are you listed?

Number of respondents: 26

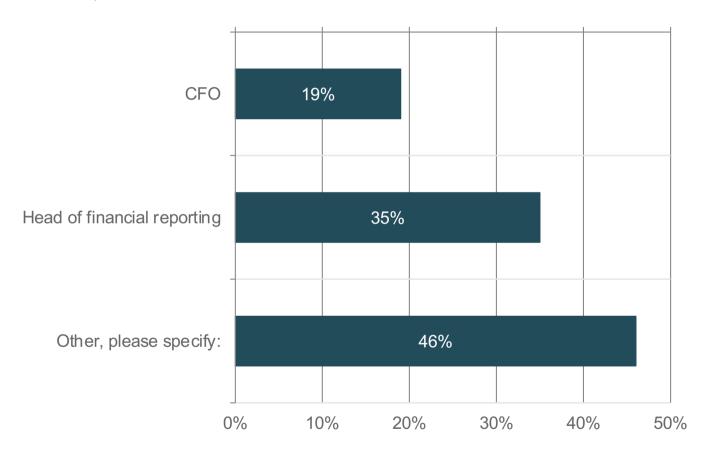


 $0\% \ 5\% \ 10\% \ 15\% \ 20\% \ 25\% \ 30\% \ 35\% \ 40\% \ 45\%$

2. In what segment are you listed?

| | n | Prosentti |
|---|----|-----------|
| Large Cap – companies with a share value over EUR 1 billion | 9 | 34,6% |
| Mid Cap – companies with a share value exceeding EUR 150 million but not more than EUR 1 billion | 6 | 23,1% |
| Small Cap – companies with a share value up to EUR 150 million | 11 | 42,3% |

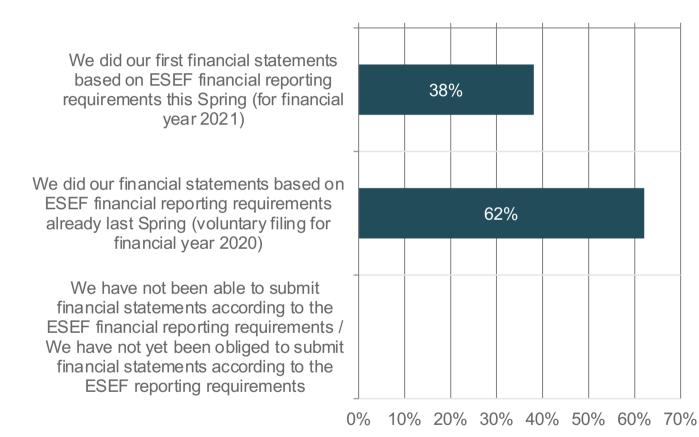
3. What is your role?



3. What is your role?

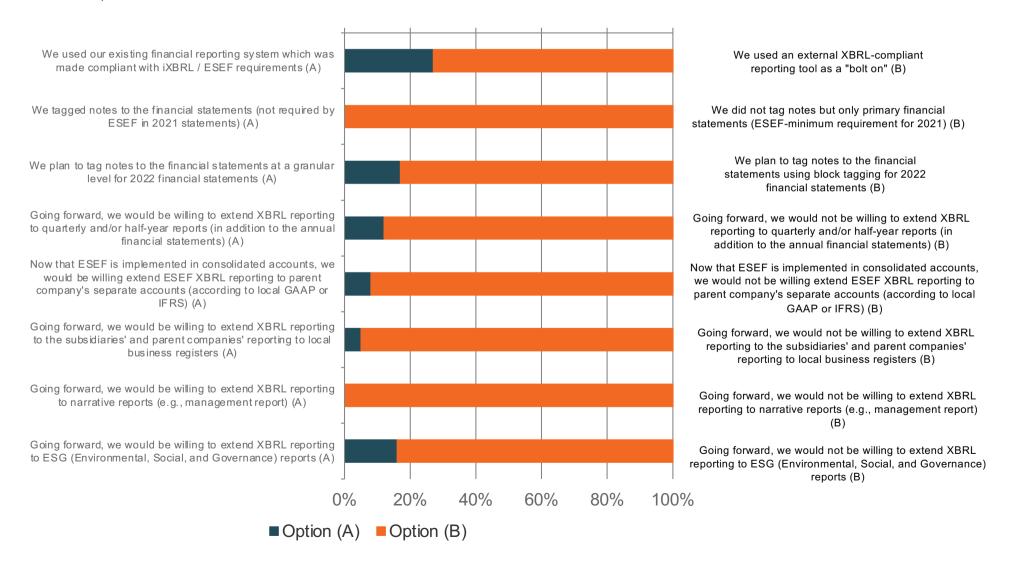
| | n | Prosentti |
|-----------------------------|----|-----------|
| CFO | 5 | 19,2% |
| Head of financial reporting | 9 | 34,6% |
| Other, please specify: | 12 | 46,2% |

4. Please indicate when you started to submit your financial statements according to the ESEF financial reporting requirements (i.e., in XBRL format)?



4. Please indicate when you started to submit your financial statements according to the ESEF financial reporting requirements (i.e., in XBRL format)?

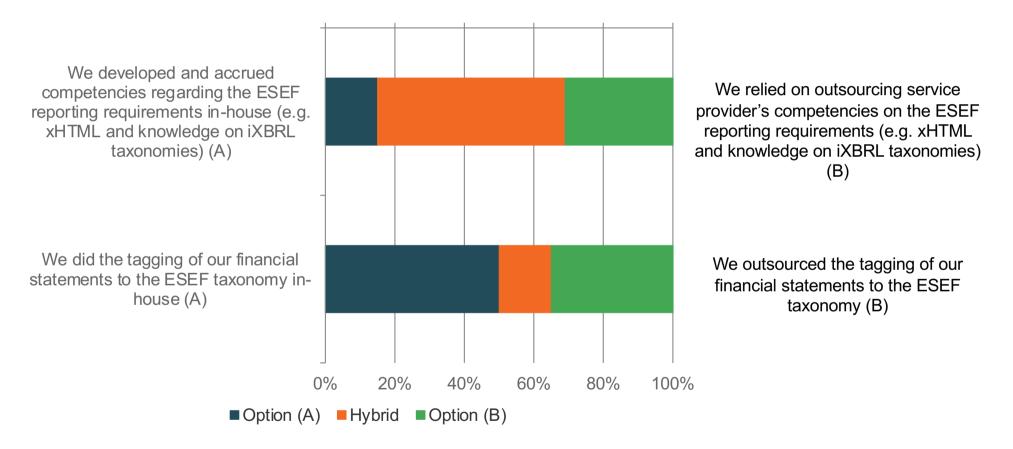
| | n | Prosentti |
|--|----|-----------|
| We did our first financial statements based on ESEF financial reporting requirements this Spring (for financial year 2021) | 10 | 38,5% |
| We did our financial statements based on ESEF financial reporting requirements already last Spring (voluntary filing for financial year 2020) | 16 | 61,5% |
| We have not been able to submit financial statements according to the ESEF financial reporting requirements / We have not yet been obliged to submit financial statements according to the ESEF reporting requirements | 0 | 0,0% |



| | Option (A) | Option (B) | | Yhteensä | Keskiarvo | Mediaani |
|--|------------|------------|---|----------|-----------|----------|
| We used our existing | 7 | 19 | We used an external | 26 | 1,7 | 2,0 |
| financial reporting system which was made compliant with iXBRL / ESEF requirements (A) | 26,9% | 73,1% | XBRL-compliant reporting tool as a "bolt on" (B) | | | |
| We tagged notes to | 0 | 25 | We did not tag notes | 25 | 2,0 | 2,0 |
| the financial statements (not required by ESEF in 2021 statements) (A) | 0,0% | 100,0% | but only primary financial statements (ESEF-minimum requirement for 2021) (B) | | | |
| We plan to tag notes | 4 | 20 | We plan to tag notes | 24 | 1,8 | 2,0 |
| to the financial statements at a granular level for 2022 financial statements (A) | 16,7% | 83,3% | to the financial statements using block tagging for 2022 financial statements (B) | | | |

| | Option (A) | Option (B) | | Yhteensä | Keskiarvo | Mediaani |
|--|------------|--------------------|--|----------|-----------|----------|
| Going forward, we would be willing to extend XBRL reporting to quarterly and/or half-year reports (in addition to the annual financial statements) (A) | 3 12,0% | 22 88,0% | Going forward, we would not be willing to extend XBRL reporting to quarterly and/or half-year reports (in addition to the annual financial statements) (B) | 25 | 1,9 | 2,0 |
| Now that ESEF is implemented in consolidated accounts, we would be willing extend ESEF XBRL reporting to parent company's separate accounts (according to local GAAP or IFRS) (A) | 2 8,3% | <u>22</u> 91,7% | Now that ESEF is implemented in consolidated accounts, we would not be willing extend ESEF XBRL reporting to parent company's separate accounts (according to local GAAP or IFRS) (B) | 24 | 1,9 | 2,0 |
| Going forward, we would be willing to extend XBRL reporting to the subsidiaries' and parent companies' reporting to local business registers (A) | 1 4,8% | 20 95,2% | Going forward, we would not be willing to extend XBRL reporting to the subsidiaries' and parent companies' reporting to local business registers (B) | 21 | 2,0 | 2,0 |

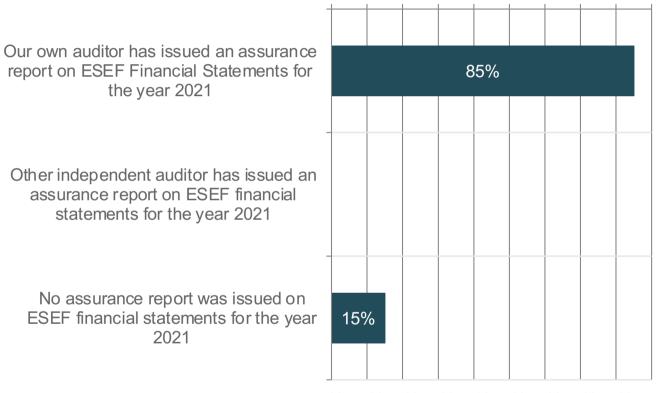
| | Option (A) | Option (B) | | Yhteensä | Keskiarvo | Mediaani |
|--|------------|------------|--|----------|-----------|----------|
| Going forward, we | 0 | 24 | Going forward, we | 24 | 2,0 | 2,0 |
| would be willing to extend XBRL reporting to narrative reports (e.g., (A)0,0%100,0%would not be willing to extend XBRL reporting to narrative reports (e.g., (B) | | | | | | |
| Going forward, we | 4 | 21 | Going forward, we | 25 | 1,8 | 2,0 |
| would be willing to extend XBRL reporting to ESG (Environmental, Social, and Governance) reports (A) | 16,0% | 84,0% | would not be willing to extend XBRL reporting to ESG (Environmental, Social, and Governance) reports (B) | | | |
| Yhteensä | 21 | 173 | | 194 | 1,9 | 2,0 |



| | Option (A) | Hybrid | Option (B) | | Yhteensä | Keskiarvo | Mediaani |
|--|------------|--------|------------|--|----------|-----------|----------|
| We developed and | 4 | 14 | 8 | We relied on | 26 | 2,2 | 2,0 |
| accrued competencies regarding the ESEF reporting requirements in- house (e.g. xHTML and knowledge on iXBRL taxonomies) (A) | 15,4% | 53,8% | 30,8% | outsourcing service provider's competencies on the ESEF reporting requirements (e.g. xHTML and knowledge on iXBRL taxonomies) (B) | | | |
| We did the tagging | 13 | 4 | 9 | We outsourced | 26 | 1,8 | 1,5 |
| of our financial statements to the ESEF taxonomy in-house (A) | 50,0% | 15,4% | 34,6% | the tagging of our financial statements to the ESEF taxonomy (B) | | | |
| Yhteensä | 17 | 18 | 17 | | 52 | 2,0 | 2,0 |

7. Please indicate whether an independent auditor provided assurance on your ESEF financial statements for the year 2021

Number of respondents: 26

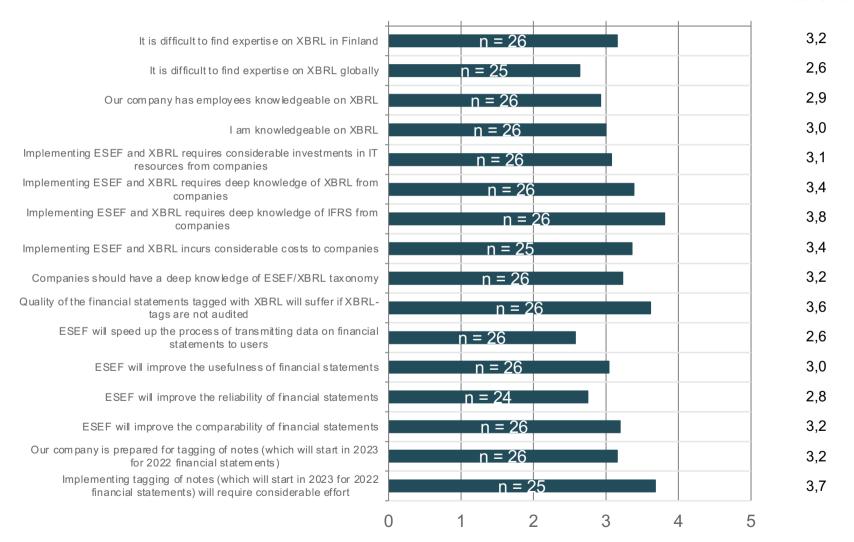


 $0\% \ 10\% 20\% 30\% 40\% 50\% 60\% 70\% 80\% 90\%$

7. Please indicate whether an independent auditor provided assurance on your ESEF financial statements for the year 2021

| | n | Prosentti |
|---|----|-----------|
| Our own auditor has issued an assurance report on ESEF Financial Statements for the year 2021 | 22 | 84,6% |
| Other independent auditor has issued an assurance report on ESEF financial statements for the year 2021 | 0 | 0,0% |
| No assurance report was issued on ESEF financial statements for the year 2021 | 4 | 15,4% |

Number of respondents: 26



Keskiarvo

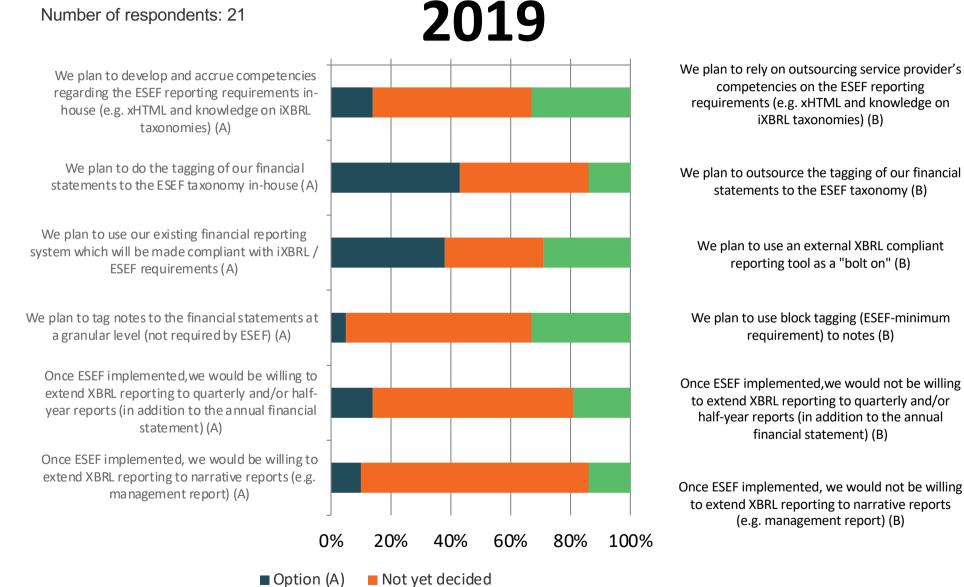
1 2 3 Keskiarvo Mediaani 4 5 7,7% 11,5% 3,2 It is difficult to find 42,3% 34,6% 3,9% 3,0 expertise on XBRL in Finland 20,0% 20,0% 40,0% 16,0% 4,0% 2,6 3,0 It is difficult to find expertise on XBRL globally 15,4% 15,4% 30,8% 38,4% 0,0% 2,9 3,0 Our company has employees knowledgeable on XBRL 34,6% l am 11,6% 19,2% 26,9% 7,7% 3,0 3,0 knowledgeable on XBRL 23,1% 11,5% 30,8% 15,4% 19,2% 3,1 3,0 Implementing ESEF and XBRL requires considerable investments in IT resources from companies

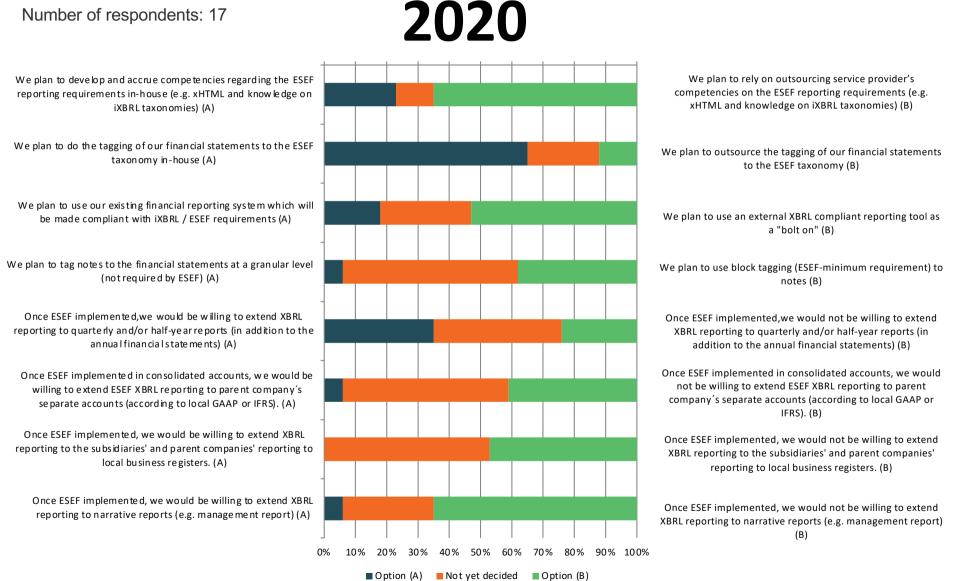
| | 1 | 2 | 3 | 4 | 5 | Keskiarvo | Mediaani |
|--|------|-------|-------|-------|-------|-----------|----------|
| Implementing ESEF and XBRL requires deep knowledge of XBRL from companies | 0,0% | 30,8% | 19,2% | 30,8% | 19,2% | 3,4 | 3,5 |
| Implementing ESEF and XBRL requires deep knowledge of IFRS from companies | 0,0% | 11,5% | 19,2% | 46,2% | 23,1% | 3,8 | 4,0 |
| Implementing ESEF and XBRL incurs considerable costs to companies | 0,0% | 16,0% | 48,0% | 20,0% | 16,0% | 3,4 | 3,0 |
| Companies should have a deep knowledge of ESEF/XBRL taxonomy | 7,7% | 19,2% | 19,2% | 50,0% | 3,9% | 3,2 | 4,0 |
| Quality of the financial statements tagged with XBRL will suffer if XBRL- tags are not audited | 7,7% | 15,4% | 11,5% | 38,5% | 26,9% | 3,6 | 4,0 |

| | 1 | 2 | 3 | 4 | 5 | Keskiarvo | Mediaani |
|---|-------|-------|-------|-------|-------|-----------|----------|
| ESEF will speed up the process of transmitting data on financial statements to users | 23,1% | 23,1% | 26,9% | 26,9% | 0,0% | 2,6 | 3,0 |
| ESEF will improve the usefulness of financial statements | 11,5% | 15,4% | 30,8% | 42,3% | 0,0% | 3,0 | 3,0 |
| ESEF will improve the reliability of financial statements | 16,6% | 16,7% | 45,8% | 16,7% | 4,2% | 2,8 | 3,0 |
| ESEF will improve the comparability of financial statements | 7,7% | 15,4% | 38,5% | 26,9% | 11,5% | 3,2 | 3,0 |
| Our company is prepared for tagging of notes (which will start in 2023 for 2022 financial statements) | 7,7% | 23,1% | 34,6% | 15,4% | 19,2% | 3,2 | 3,0 |

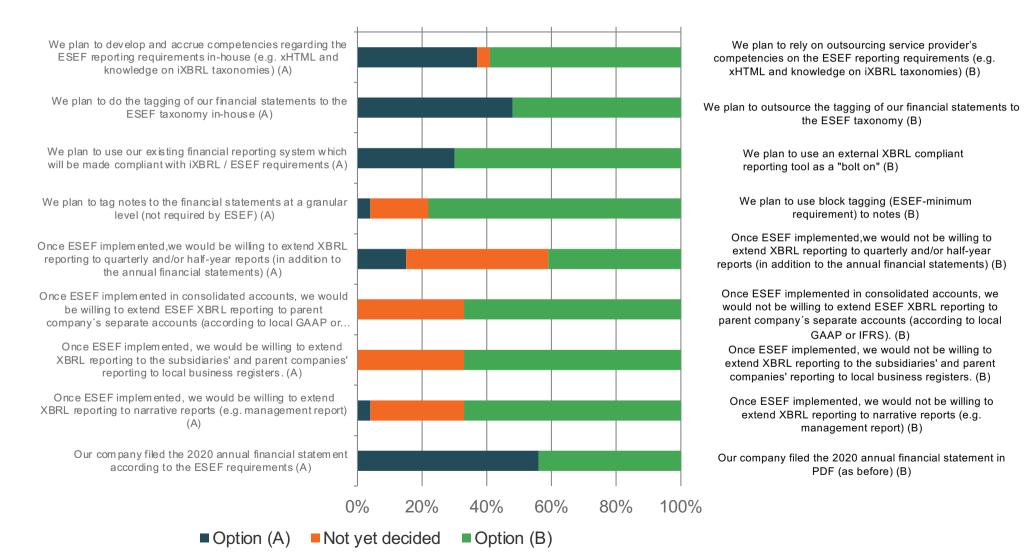
| | 1 | 2 | 3 | 4 | 5 | Keskiarvo | Mediaani |
|--|---|-------|-------|-------|-------|-----------|----------|
| Implementing tagging of notes (which will start in 2023 for 2022 financial statements) will require considerable effort | | 12,0% | 24,0% | 32,0% | 28,0% | 3,7 | 4,0 |

Comparison between 2019 and 2020



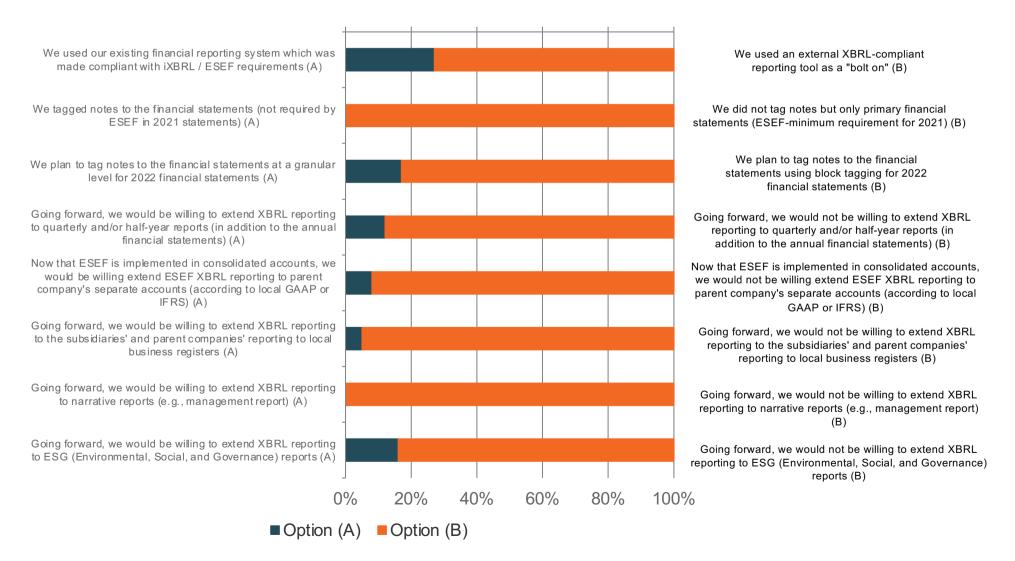


2021



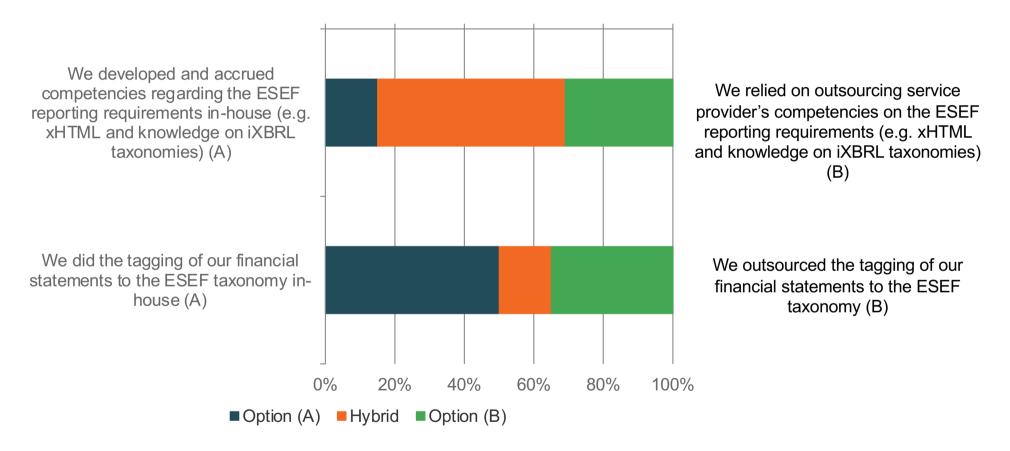
2022

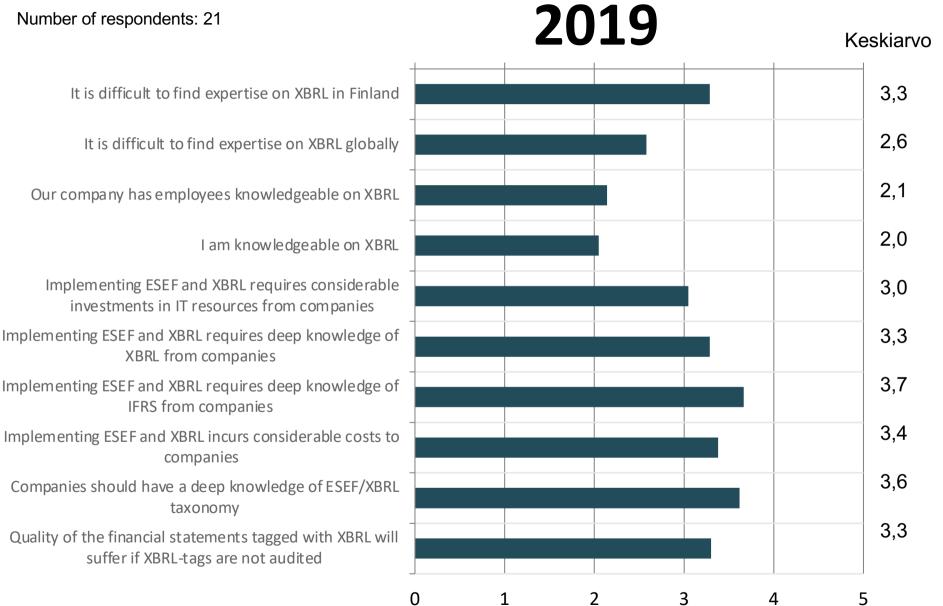
5. Please indicate how you implemented the ESEF financial reporting requirements (for potentially unclear vocabulary, consult e.g. https://www.xbrl.org/the-standard/how/getting-started-for-business/)

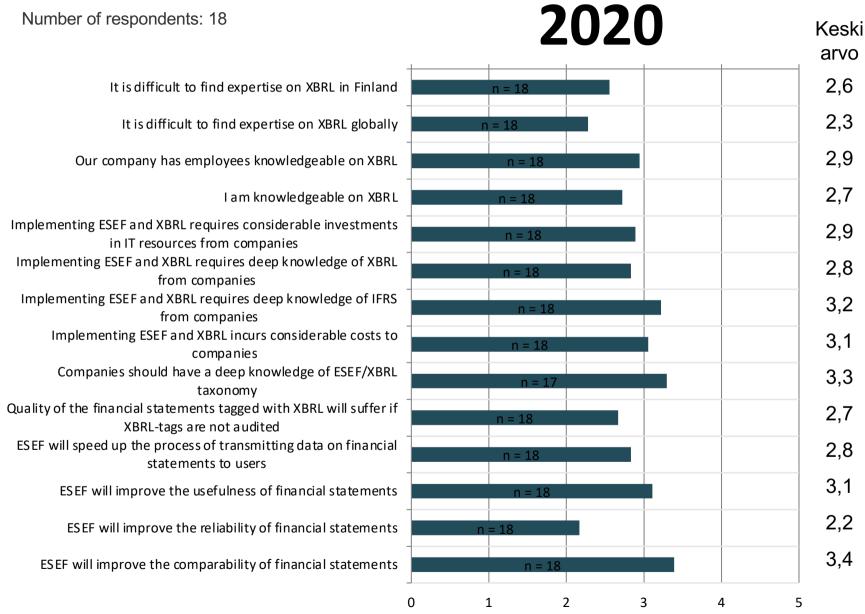


2022

6. Please indicate how you implemented the ESEF financial reporting requirements (for potentially unclear vocabulary, consult e.g. https://www.xbrl.org/the-standard/how/getting-started-for-business/)







2021

| | | Keskiarvo |
|--|-------------|-----------|
| It is difficult to find expertise on XBRL in Finland | n = 27 | 2,7 |
| - It is difficult to find expertise on XBRL globally | n = 26 | 2,7 |
| Our company has employees knowledgeable on XBRL | n = 27 | |
| - | | 3,0 |
| I am knowledgeable on XBRL | n = 27 | 2,8 |
| Implementing ESEF and XBRL requires considerable investments in IT resources from companies | n = 27 | 2,4 |
| Implementing ESEF and XBRL requires deep knowledge of XBRL from companies | n = 27 | 3,0 |
| Implementing ESEF and XBRL requires deep knowledge of IFRS from companies | n = 27 | 3,6 |
| Implementing ESEF and XBRL incurs considerable costs to companies | n = 27 | 2,9 |
| Companies should have a deep knowledge of ESEF/XBRL taxonomy | n = 27 | 3,1 |
| Quality of the financial statements tagged with XBRL will suffer if XBRL-tags are not audited | n = 27 | 3,5 |
| ESEF will speed up the process of transmitting data on financial statements to users | n = 27 | 2,8 |
| ESEF will improve the usefulness of financial statements | n = 27 | 3,0 |
| ESEF will improve the reliability of financial statements | n = 27 | 2,5 |
| ESEF will improve the comparability of financial statements | n = 27 | 3,0 |
| ۔ ۵ | 0 1 2 3 4 5 | |

2022

Keskiarvo

8. Please indicate on a scale (1 = do not agree ... 5 = agree), your opinion on the following statements regarding ESEF and XBRL

| | | I | | | I | I |
|--|-------------|--------|--------|---|---|---|
| It is difficult to find expertise on XBRL in Finland | d | n = 2 | 26 | | | : |
| It is difficult to find expertise on XBRL globall | ly | n = 25 | | | | 2 |
| Our company has employees knowledgeable on XBRI | | n = 2 | 6 | | | 2 |
| I am knowledgeable on XBRI | | n = 2 | 26 | | | ; |
| Implementing ESEF and XBRL requires considerable investments in I resources from companies | Т | n = 2 | 26 | | | ; |
| Implementing ESEF and XBRL requires deep knowledge of XBRL fron companies | n – | n = | : 26 | | | |
| Implementing ESEF and XBRL requires deep knowledge of IFRS from companies | n | n | n = 26 | | | ; |
| Implementing ESEF and XBRL incurs considerable costs to companies | s | n = | 25 | | | |
| Companies should have a deep knowledge of ESEF/XBRL taxonom | у | n = | 26 | | | : |
| Quality of the financial statements tagged with XBRL will suffer if XBRL tags are not audited | - | n | = 26 | | | ; |
| ESEF will speed up the process of transmitting data on financia statements to users | al | n = 26 | | | | 2 |
| ESEF will improve the usefulness of financial statement | s | n = 2 | 26 | | | : |
| ESEF will improve the reliability of financial statements | is s | n = 24 | | | | |
| ESEF will improve the comparability of financial statements | ts | n = 1 | 26 | | | ; |
| Our company is prepared for tagging of notes (which will start in 2023 for 2022 financial statements) | 3 | n = 2 | 26 | | | |
| Implementing tagging of notes (which will start in 2023 for 2023 financial statements) will require considerable effort | 2 | n | = 25 | | | : |
| | 0 | 1 | 2 | 3 | 4 | 5 |

Observations on trends 2019 -> 2020 -> 2021 -> 2022

- Deployment pressure can be seen in the latest survey results
 - Respondents find that it is somewhat difficult to find expertise on XBRL in Finland in 2022 (3,2) compared to 2,7 (2021) and 2,6 (2020) and 3,3 (2019); issuers have employees knowledgeable on XBRL (2,1 -> 2,9 -> 3,0 -> 2,9)
 - Perceptions about incurred costs bounced back to where they were in 2019 (3,4 -> 3,1 -> 2,9 -> 3,4).
 - Steady progression towards completion of ESEF project as all respondents declared that they were able to submit their financial statements (compared to 2021 when 74% of respondents had completed their ESEF project, 26% had selected the deployment model but project not yet complete).
- Regarding deployment model
 - Balance between outsourcing and in-house development: tagging close to 50 (in-house)/50 (outsourced)
 - "Bolt-on" preferred over "integrated" at 73% in the latest survey
- Voluntarily extending XBRL reporting
 - Respondents indicated that their companies opt for the minimum requirements.
 - Sixteen percent of respondents would be willing to extend XBRL to ESG reporting.
- Benefits of XBRL
 - Perceptions about the improvements to financial statements' comparability (3,4 -> 3,0 -> 3,2) and usefulness (3,1 -> 3,0 -> 3,0) have remained roughly the same over the surveys.
 - Companies increasingly feel that XBRL could improve reliability of financial reporting (2,2 -> 2,5 -> 2,8).