TAX FOOTPRINT 2025

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Tax Footprint 2025

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CFO introduction

Dear stakeholders,

Fortum continues its commitment to tax transparency, responsible tax management and our tax principles. We believe that managing taxes in a responsible and transparent way is important for us and our stakeholders.

As we execute our strategy to deliver reliable low-carbon energy, drive the decarbonisation of industries, and transform and develop to meet the needs of the ever-changing operating environment, consistent and predictable regulation – including tax regulation – is increasingly important to ensure an attractive environment for new investments and ongoing business considering current geopolitical and regulatory uncertainty.

Fortum continued to have a stable and robust financial position in 2025. We achieved this through good optimisation of our power generation and continued with our strategy implementation. The long-term profitability outlook for new investments is challenging due to the volatile market environment. This is further hindered by extraordinary tax costs, such as ATAD interest deductibility restrictions, which are not beneficial for capital-intensive businesses.

We anticipate that new regulations – such as the EU's 2025 Omnibus bill – might have unpredictable impacts on the financial markets. While we are in favour of simplifying to reduce compliance burdens, concern remains that changes might not be enough to actually ease tax compliance. Currently, regulations for large capital investments are penal and complex and do not meet their desired objective either. We welcome evolution of these rules and incentives when it comes to investing in low-carbon energy and decarbonisation.

Aligning tax regulations and policies with the business environment is crucial to support the energy transition. These regulations must also be defined well and considered against different taxes and different policies so that unexpected outcomes do not occur.

To ensure this, we continue to participate in the public discussion, share our insights, and contribute to the design and implementation of robust and high-quality tax legislation that supports the energy transition. We hope this gives a positive boost to low-carbon energy investments.

In 2025, Fortum was again awarded the Fair Tax Mark accreditation and achieved a top score in the Tax Responsibility and Transparency Index, which is an independent verification of our commitment to responsible tax management. Deloitte assures this report. In this report, you can also read more about all our tax-related initiatives, such as how we have engaged with legislators and policymakers, and the taxes we have paid and collected in the countries we operate in.

I hope you enjoy reading our 2025 report!

Tiina Tuomela
Chief Financial Officer

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Executive summary

Fortum pays taxes according to existing local tax legislation, international tax agreements and defined tax principles in its operating countries. Fortum's total tax contribution in 2025 was EUR 290 million in taxes borne and EUR 542 million in taxes collected. At Fortum, when talking about taxes, we always mean all tax types.

We are committed to responsible tax management in line with the letter of the law and the purpose of rules and regulations to ensure sustainable taxation. A sustainable approach is important both for the company and for our stakeholders, such as our owners, the communities where we operate, and our employees.

Taxes are one of many factors that we take into consideration when making business decisions. Our business solutions are not driven by tax considerations, but are supported by Group Tax as a business partner in line with our Tax Principles and the pursuit of predictability and certainty.

Business decisions take into consideration the views of multiple key stakeholders, including Group Tax, to ensure that Fortum operates and invests profitably and efficiently, within a defined risk level. In our tax work, we consider all sustainability aspects to ensure shareholder returns, value creation for societies and compliance with our governance model.

Our commitment to responsible tax management is proven through the Fair Tax Mark, received for the third year in a row. We also continue to carry out a self-assessment of how we perform in relation to The B-Team Responsible Tax Principles. Furthermore in 2025, we have reached our targets with the score of 76/100 on the Tax Responsibility & Transparency Index.

Fortum operates in the energy sector primarily in the Nordics. Our business is characterised by long-term, capital-intensive investments. Our climate commitment to drive the energy transition means that our business must constantly adapt to the challenging business environment, including the rapidly changing tax environment.

In 2025, we concluded that the ATAD rules may create an extra tax cost for investments, even up to 20%. This will be further explained in the report.

As part of our tax management, we engage in the public debate on the development of national and international tax rules. We provide relevant information and feedback to legislators, policymakers, investors, civil society organisations and other stakeholders. We aim to promote fairer and more sustainable tax systems to ensure an attractive operating environment for investments in low-carbon energy and to meet the EU's climate targets.

In this report, we describe the value creation of our operations, portray our current tax and operating environment, and report our total tax contribution in our main operating countries, including those in which we have holding and financing companies. This report also includes a summary of our Board-approved tax principles, expanded information explaining tax disclosures, country-by-country reporting as well as information about our tax disputes.

See our key terms and definitions on page 38 which will assist you in understanding this report.

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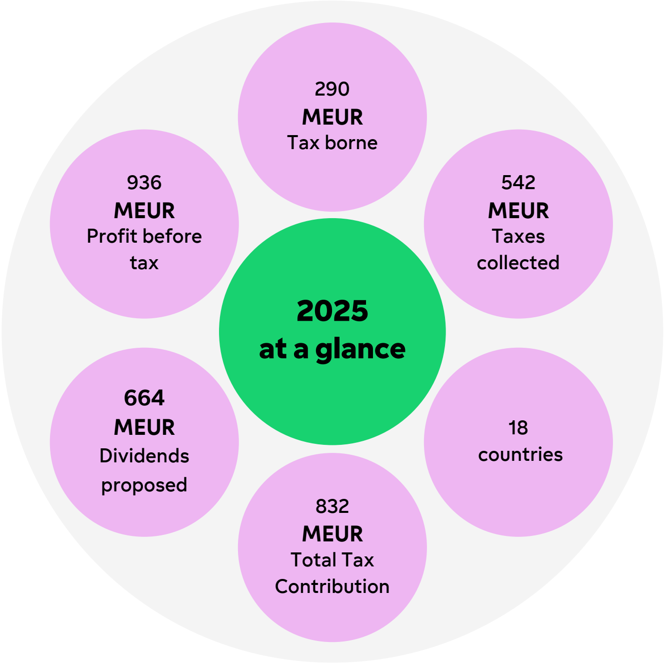

Developments and main events in 2025:

- Fortum sold its Recycling and Waste (R&W) business in December 2024 which decreases the weight of our tax contribution in 2025.
- Helsinki Administrative court confirmed Fortum's understanding that the Finnish windfall tax conflicts with EU regulation and EU law and therefore is not applicable. This decision is currently under appeal in the Supreme Administrative Court.
- Fortum started simplification of its legal company structure by merging and liquidating dormant or non-active companies.
- We took steps, partnering with business at an early stage, to digitalise business processes to ease up compliance.
- We updated and developed our Tax Principles, which were approved by the Board of Directors in December.
- We updated our Tax Governance and policies in line with organisational changes and will continue this improvement process into 2026.

The purpose of Fortum's Tax Footprint

Our target is to help the reader understand Fortum's tax principles, our view on the tax environment, our tax management and our tax contribution.

This report is intended to benefit shareholders, investors, employees, local societies, tax authorities and governments, including policymakers. We believe:

- Shareholders and analysts benefit by understanding our tax environment and how we manage tax risk and opportunities.
- Tax authorities benefit by open engagement and insight into our business and tax model.
- Local societies benefit by understanding our tax principles, value chain and our tax contribution where we operate.
- Employees could be interested in the sections about our tax principles and governance, our operating environment, value chain and total tax contribution.
- Governments benefit by understanding our commitment to contribute to robust and well-functioning tax regimes promoting the energy transition.

We encourage all stakeholders to provide feedback on our report to tax.transparency@fortum.com.

Note: When we talk about tax we are referring to all taxes. See our definitions at the end of the report.

Assurance of Tax Footprint

Fortum's external auditor, Deloitte, has assessed that this Tax Footprint report contains the information required by the Accounting Act, chapter 7b (3.5.2024/238) and the Government Decree on the Content of the Income Tax Report (20.6.2024/384).

The external auditor has also reviewed;

- the tax strategy, tax governance and tax principles and that they are consistent with the information published in the Tax Footprint report; and
- the processes and controls designed for collecting the quantitative data related to this Tax Footprint for total tax contribution, effective tax reconciliations and EU Public Country-by-Country reporting, and other financial data disclosed.

Tax Footprint contributors

This report is prepared by Fortum's Group Tax team with contribution from Fortum's CFO, Investor Relations, Group Accounting and Sustainability teams.

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Fortum's Tax Principles

We aim to manage our taxes respecting responsible tax management principles, to ensure that our businesses can continue to invest and operate efficiently, and to safeguard returns for our shareholders. Fortum is committed to The B-team Responsible Tax Principles, participates actively in B-team work and has built our approach to taxation on those principles to fit our business and organisation. We apply our Tax Principles to all taxes.

The purpose of this section is to describe Fortum's approach to taxation and the principles that steer the Group's tax management.

- We strictly comply with the Tax Principles approved by Fortum's Board of Directors.
- Our strategic and operating objectives are the starting point when planning and optimising taxes as part of business planning.
- We aim to comply with not only the law but the purpose of the law.
- Our tax advocacy promotes responsible tax legislation and is equally supporting the energy transition.
- We aim to communicate our key tax positions in an understandable way.
- We assess the risks and uncertainties of our business and solutions, and we run key controls to ensure compliance with laws and our principles.
- Our approach to tax risk follows the "more likely than not" principle.

When making business decisions, we consider the associated tax consequences and our ability to mitigate any risks. We comply with the rules and recognise that material issues require particular attention in the decision-making process. We work to ensure that our approach to tax is aligned with our operational functions supporting our current and future business.

In 2025, we continued with our internal self-assessment of the Tax Principles. We have assessed and monitored the commitment to Fortum's Tax Principles within all our business. We have also expanded our e-learning program to a wider audience to maintain their awareness of the Tax Principles and to discuss how our businesses contribute to the execution of Tax Principles.

Fortum's current Tax Principles have been approved by Fortum Corporation's Board of Directors in December 2025. They complement Fortum's Code of Conduct and are published on Fortum's website together with a summary of our Tax Governance principles.

Link: Our Tax Principles and Governance

What is responsible tax management?

Responsible tax management refers to our ethical and strategic approach to taxes - both as an organisation and as individuals. It ensures management attention for taxes and compliance with the letter and purpose of tax laws, while considering shareholder, social and environmental impacts. It involves transparent reporting, fair tax practices, and a commitment to contributing to the wellbeing of the community and sustainable legislation.

To be responsible, it is vital that huge emphasis is put on creating sustainable tax principles respecting not only the shareholder value, but also other stakeholder interests that have a Group-wide reach. Merely having these principles is not enough, we must continually assess ourselves to ensure that we are following the principles.

We have a robust review system whereby the Tax Principles are reviewed every second year and updated if required.

OUR TAX PRINCIPLES INCLUDE THE FOLLOWING MAIN POINTS:

GOVERNANCE – We are committed to continuous development to ensure responsible tax management and sustainable principles. The principles are governed by Fortum Corporation's Board of Directors and communicated company-wide to ensure compliance.

COMPLIANCE – We have a consistent compliance process to ensure that regulations are followed in all parts of our operations and that the correct amount of tax is paid at the right time in the countries in which we operate.

BUSINESS STRUCTURE – We only use business structures that are driven by commercial considerations, are aligned with our business activity and have genuine substance. We do not seek abusive tax results or utilise structures where set ups have been based solely on their tax laws or being a tax haven within the definitions set by the EU.

TAX RISK PROFILE – We follow the approved Fortum business risk appetite in all our tax work: this ensures that we have a responsible approach to tax risk management. Additionally, we follow the 'more likely than not' principle in our tax risk assessment.

TAX PLANNING – We respect the purpose of the law. We also respect shareholders' interests and seek optimisation and elimination of double taxation.

RELATIONSHIPS WITH OTHERS – Fortum engages with governments and tax authorities to explain what impacts their tax policies and regulations have on us. We participate in public discussions relating to taxation to promote responsible tax legislation and to show how important predictive legislation is to capital-intensive business.

REPORTING TO STAKEHOLDERS – We are committed to ensuring that stakeholders are able to understand the important elements of our tax position and that the information provided in our tax reporting is fair and accurate.

Our tax and operating environment

This section explains how Fortum's Group Tax Team navigates in its operating and regulatory environment.

Tax outlook for Fortum

Our estimate for the Group's 2026 comparable effective income tax rate is 18–20%.

Fortum is continuously making significant efforts in the area of responsible tax management, including transparency, for which Fortum has been recognised by stakeholders and through accreditation bodies (see page 17–18). With a responsible and sustainable approach to taxation, we ensure that we pay our share of taxes, while supporting a better, decarbonised world.

We operate mainly in the Nordics where the decarbonisation of the economy is a key priority for governments. Governments face challenges with budget constraints while trying to ensure that the regulatory and political environment supports new investments. The European Union is taking efforts to improve the competitiveness of the European market, leading the energy transition and providing simplification to tax directives. These actions are needed now to ensure that businesses can operate in a stable and secured regulatory environment and can secure energy supply as well as new investments for growth. We have yet to see related actions from the EU.

In the energy sector, we have experienced how the ability to invest in new low-carbon technology is heavily dependent on the regulatory framework. Simultaneously, competitiveness and profitability of existing production fleet has to be secured.

Various regulatory areas were in focus in 2025:

- Taxable EBITDA based interest cost limitations create challenges for businesses in an environment with high market interest rates and low energy prices.
- The real estate tax burden in Sweden increased significantly in 2025. As the increase is based on updated tax values which are impacted by high power prices and costs in 2018–2023, the valuation method is not sustainable, considering the low power prices now.
- We welcome the Finnish Government's programme to support new investments in Finland as it will benefit investments in low-carbon energy.
- Pillar Two: Fortum joined the alliance of European based companies to promote permanent safe harbour rules for Minimum Tax regulation to highlight the compliance and anti-competitiveness impacts on the business.
- Important EU Commission initiative: the process to revise ATAD rules, including interest deduction. The inclusion of energy investments in the exemption rules in a unified manner across EU Member States would mitigate the negative effect of the rules on investments that are crucial for security of supply and the promotion of low-carbon energy.

Interaction between business and tax environment

	Past	Current	Future Goal	What do we need?
Fortum business environment	Volatile and high price energy markets; Restoring capability to invest; Low-carbon energy targets; Elevated interest rates.	Lower and volatile power prices; Low-carbon energy and security of supply targets; Stabilising interest rates.	New investments; Stable financials and forecasted profits.	**Regulatory simplicity and stability in our tax environment to promote investments to ensure Fortum's strategy executions**
Fortum tax environment	**Double tax:** Utilise significant Deferred Tax Assets (loss carryforward); Efficient financing.	**Non-proportional regulation:** Low power prices drive tax impact; High compliance; Poor predictability.	**Dynamic impacts:** Simplified and proportional regulations eliminating obstacles for growth and investments.	

Investment readiness

Fortum's financial position has been on very stable footing during the past years providing the capacity and readiness for new investments when attractive opportunities occur. Low power prices and poor visibility of future events still create a challenge for profitability of the investments.

Our Tax Principles help us to navigate through the volatile macro and micro environments of business and taxation.

> Through a responsible and sustainable approach to tax, we want to ensure that business can operate and we pay our share of tax, supporting a better, decarbonised world.

In line with our strategy implementation, Fortum's Group Tax Team has actively raised awareness around taxes, tax impacts and Tax Principles to ensure that taxation is factored into the renewal of business processes at an early stage.

While our comparable profit and taxable income stabilised, our tax position continued to be challenging primarily due to material deferred tax assets, high interest rates combined with lower power prices, impacting their deductibility, and continued poor predictability of tax regulations. The lack of unified interpretation of tax rules across nations, combined with hesitance of some tax authorities to give guidance on new legislation, continue to be challenging.

Investment decision impacted by tax

Investing in low-carbon energy production is capital-intensive, with project lifetimes spanning 40–60 years and often requiring years of development before becoming operational. These investments face complex regulations and risks stemming from volatility in the energy and capital markets.

New investments are evaluated on a project basis, focusing on the profitability of a single initiative rather than its impact on the legal entity as a whole. This approach often overlooks broader tax and compliance implications, particularly given the complexity of tax regulations at legal company level. This challenges the business environment and when assessed, negatively impacts investment prospects.

Tax-related limitations can create timing differences that primarily result in negative cash flow, which negatively impact the investment analysis, and in the long-term, even increase tax cost. Taxes affect both cash flow and profitability. These impacts could be avoided with a neutral tax treatment of the business, such as full interest deduction independent of profitability.

> Neutral tax rules create predictability and lower investment risk.

EU's Regulatory Power: Shaping Tax Policies and Business Strategies

As a regulator, the EU plays a role in our tax outlook with new policies on its agenda. The rules already in place, like Pillar Two and ViDA (VAT in the Digital Age), show that future focus of our tax function will be in areas of compliance and digitalisation of tax. This means that tax management needs to be developed from end to end to have true visibility of the tax positions in real time online. The rapidly evolving geopolitical landscape presents challenges for both new and existing regulations. For instance, the US withdrawal of Pillar Two raises concerns about anti-competitiveness for EU based businesses. The EU should have a clear understanding and an action plan to address the implications of this decision.

ADVOCACY AGENDA 2025: MAKING ATAD RULES PROPORTIONAL

Advocacy Action 1: Simplify Pillar Two rules

Fortum joined the alliance of European based companies to promote permanent safe harbour rules for Pillar Two regulations with the aim to simplify the rules. This would ease the compliance burden and not impact the taxes payable under Pillar Two legislation.

To meet the important objective of a well-functioning internal market through tax legislation, the EU's role as a tax legislator should be discussed and improved. This would allow the EU to continue the important work of true harmonisation to improve the functioning of the internal market as a whole, promoting the competitiveness and growth potential of European businesses. On 5 January 2026, the OECD published the "Side-by-Side package" introducing guidance on a permanent simplified effective tax rate (ETR) safe harbour. Despite being presented as a simplification, the package remains complex, the practical compliance burden may increase and keeps tax as a business consideration for investments to the EU. We will continue to support efforts aimed at delivering genuine simplification.

Advocacy Action 2: Better focused interest limitation

Fortum has proactively revisited interest deduction rules by participating in public hearings at the national level, such as in Finland and Sweden, and at the EU level, through the ATAD review project. We have illustrated how the current interest deduction limitations are not meeting the objective set for the rules and therefore are limiting current and future investments. Fortum has proactively proposed solutions to address these challenges, advocating for capital-intensive energy investments to be included in the infrastructure exemption. Our commitment to these initiatives underscores our dedication to producing low-carbon energy and driving industrial decarbonisation in the Nordic countries. Low-carbon energy generation is central to our role in the energy transition.

> We believe the impact of existing regulations should be evaluated before new proposals are made, and ways of implementation should be more aligned between Member States.

Climate targets overlooked by Anti-Tax Avoidance Directive

Fortum's strategy reflects how energy investments are critical for the EU's future, as the security and capacity of low-carbon energy are essential for a well-functioning EU. This requires utilities to build the critical infrastructure needed. Strengthening EU competitiveness and the internal market is crucial, as both investments and energy will have cross-Member State requirements.

Tax implications further challenge business continuity, with interest deduction limitations affecting equity investors and disadvantaging foreign investors compared to domestic ones. The volatility of EBITDA due to market conditions, combined with rising interest rates, increases financing costs for both existing debt and new investments. We believe that the EBITDA rule should be re-defined to take into consideration the limitations of long-term capital-intensive business.

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Business Case: Is loss carryforward a tax benefit?

A taxable loss occurs when a deductible cost exceeds the taxable earnings of a company during that year. This excess amount is carried forward and confirmed by tax authorities in the normal tax assessment process. This is called loss carryforward.

For accounting purposes, the timing difference between recording the loss and using it against future taxable income creates a deferred tax asset, provided it is expected to be utilised. The accounting treatment does not impact the availability of the loss carryforward for tax purposes.

Loss carryforward allows offsetting prior-year losses against future profits within the same legal entity and same income type. It does not create an incentive or additional tax benefit – it simply ensures losses can be recovered over time.

As reported in our Tax footprint in 2022–2024, Fortum has incurred significant losses due to the geopolitical impacts, mainly in our Irish financing company, from tax-deductible write-downs on intercompany loans.

The losses are so substantial that we estimate no corporate income tax payments in Ireland for approximately 20 years, in line with local legislation. Offsetting these losses is not an incentive or tax benefit to Fortum but a recovery mechanism under the law.

Our Irish finance company, as any other Fortum subsidiary, is compliant with our Tax Principles and existing laws.

Business Case: Negative interest carryforward case, Sweden

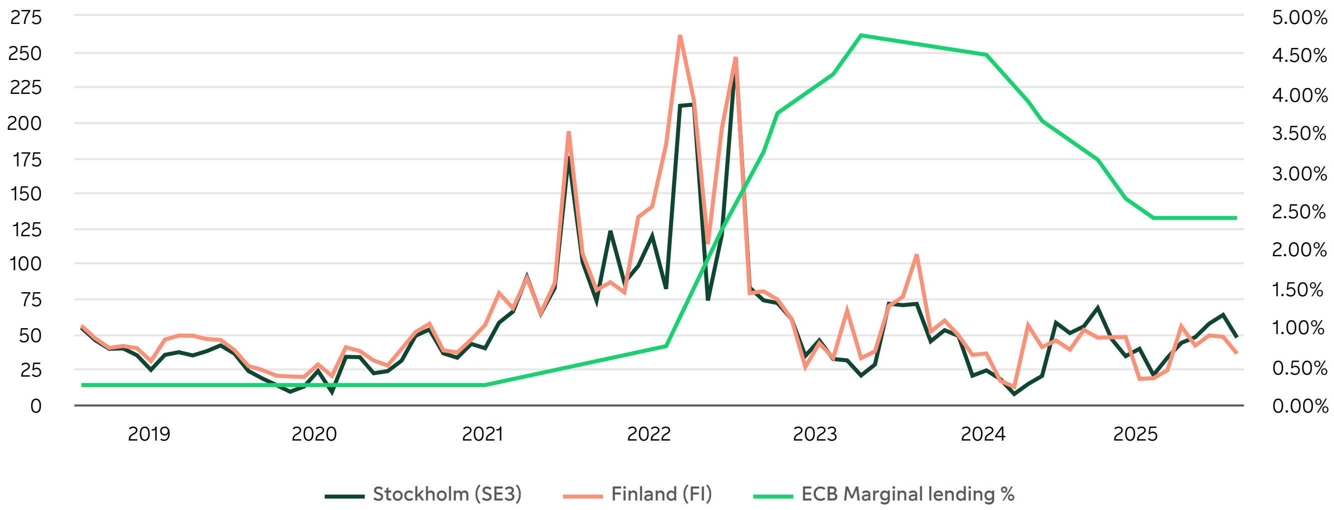
Under EU ATAD rules, interest deduction is limited based on taxable EBITDA. For example, in Sweden, rapid and disproportionate changes in market interest rates and power prices have made it increasingly challenging for capital-intensive businesses to deduct interest costs, as lower power prices reduce taxable EBITDA and higher interest rates increase interest costs (see below illustrative example of price vs rate differences over the past 6 years).

This creates challenges for investments in CO_2-free power generation, such as nuclear plants, which require significant funding from multiple investors. Although the Swedish government offers incentives like fixed prices and guaranteed debt, EU ATAD rules add extra costs – up to 20% – and increase investment risk. To eliminate this risk, the power price should be higher or full interest deduction should be allowed.

This example illustrates well how the tax avoidance focused rules may adversely impact the competitiveness of the EU business market and disrupt the functioning of the EU's internal market.

We address this topic in our advocacy approach.

Illustrative example of market electricity spot power price trend vs interest rate trend*



*Data Source: Nord Pool electricity spot price (FI - Finland, and SE3 - Stockholm) and European Central Bank interest rates,

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Fortum's tax management 2025

As explained in the previous section, Fortum's Tax Principles steer how we manage taxes. In this section, we further explain what this means in practice.

Fortum Group consists of many legal entities and is operatively organised into segments and businesses. Performance is measured by earnings before financial costs and income taxes. Taxes are borne by legal entities, i.e. subsidiaries, associated companies and joint ventures. Because segments and business areas do not align with legal entity structures or country borders, they must comply with both operational and legal governance to ensure accurate business results and tax compliance.

For our tax management, this means that all operations need to comply with Fortum's Code of Conduct, business governance and Tax Principles both at the consolidated and local level. Thus, for example, taxation must be appropriately considered in investment proposals or changes in operations. Compliance with Tax Principles is monitored through self-assessments conducted with business leaders.

Tax management impacts both local and consolidated levels: locally, cash taxes; at group level, effective tax rate, timing differences, and future outlook. This requires understanding of relevant business regulations, accounting rules and tax laws and how they function together.

Successful and sustainable tax management depends on the early engagement of the tax function with business. We align tax strategy with Fortum's overall strategy by partnering with commercial and operational teams, raising tax awareness, integrating tax into business processes, and ensuring compliance, transparent reporting, and clear communication about taxes paid in each country. We have strengthened this approach by establishing dedicated operative and strategic teams within Fortum's Group Tax Team.

Reporting material related party transactions

We continually monitor developments around both the mandatory and voluntary disclosures that may affect Fortum. With that in mind and in line with OECD principles on Corporate Governance, we have chosen to report on extraordinary and material internal Group transactions. These transactions, while reported here, are not tax driven.

In 2025, a target was set to reduce the number of legal entities with the Fortum Group. This led to several mergers and liquidations of non-active companies in the Group. In December 2025, we have also restructured our Norwegian legal structure to strengthen their balance sheet and improve their financial position. We are also implementing a simplified investment structure to enable a standardised approach to new investments in low-carbon energy.

Transparency Register and tax matters

We engage in discussions with policy makers and we participate in public hearings. We communicate about our lobbying objectives proactively and transparently. We adhere to our Public Affairs policies and also EU and national transparency register requirements. This practice provides greater clarity about the parties we engage with and the topics discussed.

In 2025, we engaged in discussions and initiatives related to the ATAD rules review (specifically related to interest deduction limitation rules), Pillar Two simplification rules and Direct Tax Directives.

In Finland, Fortum is required to disclose all lobbying actions, including tax, that are directed toward the Finnish Parliament or the ministries to the Transparency Register.

Compliance controls

Fortum Group files hundreds of tax returns covering direct and indirect taxes as well as the various information filing requests that are required by tax authorities, such as financial statements, OECD CbCR notifications and so on.

We ensure that our personnel have the correct skills and knowledge as well as sufficient time to file all returns before their deadlines and to make the correct payments to authorities on time. Furthermore, we have dedicated digital filing systems to ensure accuracy and efficiency.

We have key controls in place per Group Tax function, applicable for all tax types, to ensure compliance with existing laws and regulations and our Tax Principles.

If we find weaknesses or, in the worst case, failures in our controls, we act promptly to remedy them. Any material risk arising from the identified process weakness is reported in accordance with the Fortum Group risk process. For such issues the mitigation actions and internal controls are defined and followed on a regular basis. If the risk probability is high, the provision should be made according to IFRS® Accounting Standards. Fortum has not identified any uncertain tax positions where such provision should be booked.

Tax incentives

Fortum may utilise tax incentives that are based on law, applicable to all taxpayers in equal position, and that have been approved by competition authorities. If utilisation of a tax incentive is based on a specific application, Fortum will report its use transparently.

Fortum tax policy hierarchy and management approvals on tax issues

In 2025, we have performed a detailed review of our tax policies to be in line with our new internal reorganisation and way of working. We will have functions specific Tax Statements and Guidelines which include a purpose statement, risk assessment and internal controls specific to that function.

Strategic partner for business and stakeholders

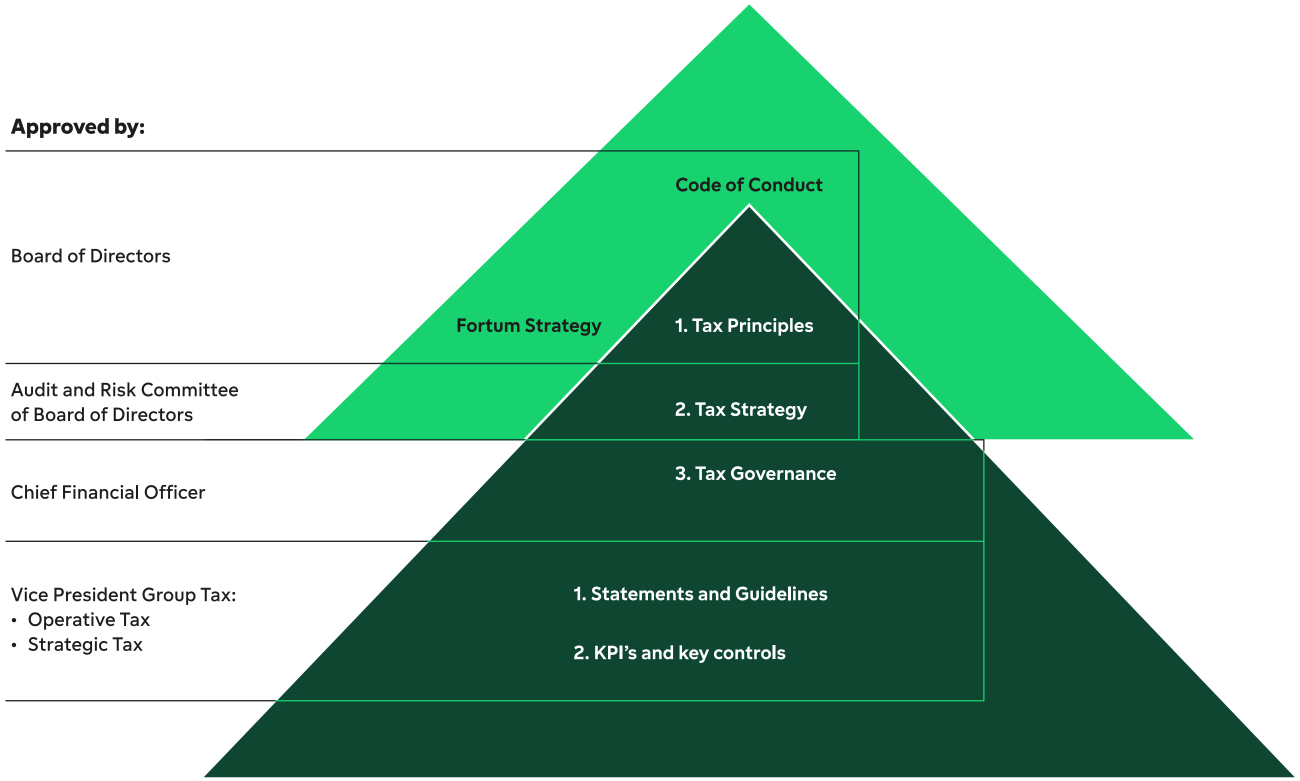
Fortum's Board of Directors gives guidance on managing taxes in line with our Code of Conduct by approving our Tax Principles and including taxes on the Board agenda based on materiality.

We have rules for escalating tax topics through the organisation up to the CFO and Fortum Leadership Team to ensure appropriate attention in decision making.

Fortum's tax strategy is aligned with the Fortum strategy to support Fortum's business and ensure responsible tax management through early engagement.

Business partnering

We utilise opportunities by building scenarios and tactical plans at an early stage to support alignment of Fortum's future businesses and projects with current and future regulation. We contribute to the design of new regulations by partnering with business, regulators and other key stakeholders. Promoting a responsible approach to tax – grounded in sound governance, sustainable practices, and transparency – will ensure Fortum remains a reliable business partner for all stakeholders.



Compliance

We utilise available data at the local and Group level to create concrete plans and instructions for stand-alone projects or new legislation at an early phase ensuring compliance with existing rules. From time to time we will utilise advisors to assist us in this work. We build key controls and assurance to monitor end-to- end processes and create transparency for key stakeholders. We ensure shareholder value and contribute to societies.

All tax matters, being a consequence of business, are part of business and other enabling function's processes and are included and aligned in our tax policy documents,

Fortum's process for engaging advisors is defined in our Fortum Group Tax Governance guidelines. The main principles are that Fortum's advisors must comply with Fortum's Tax Principles and Supplier Code of Conduct. We do not engage tax advisors whose fees are purely success based.

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Tax governance

The Chief Financial Officer (CFO) is accountable for taxes in the Fortum Leadership Team. For this purpose the CFO approves the tax governance and tax strategy. Tax strategy is then reported and approved by the Audit and Risk Committee of Board of Directors. The Vice President (VP), Group Tax implements our Tax Principles and is accountable to the CFO for ensuring that those principles, and the procedures that support them, are in place, maintained and implemented in the same manner across all countries and all taxes.

The VP, Group Tax is supported by a team of professionals; the Fortum Group Tax Team. The VP, Group Tax is responsible for ensuring that the Fortum Group Tax Team has the adequate proficiency and experience to implement our principles appropriately. The Fortum Group Tax Leadership Team supports the VP, Group Tax in implementing our tax strategy and principles and support operative business. Tax issues, such as legal processes and tax-related risks, are monitored on a regular basis by the Audit and Risk Committee of Fortum's Board of Directors.

Link: Our Tax Principles and Governance

> Good tax governance principles give the framework to our daily operations.

Tax strategy

Fortum Strategy

Deliver reliable energy to customers

Drive decarbonisation in industries

Transform and develop

Tax angle and focus areas

- Efficient tax position management
- Efficient financing process
- Focused tax expertise

- Supporting business investment
- Advocate for predictable, purpose driven regulation

- Leadership for early engagement of tax team
- Protection of equity
  - Seek neutrality and simplicity

External Trends

Investors
Sustainability
Fair tax
Shareholder value creation

Regulations
Transparency
Overlapping standards
Compliance
Complexity

Policy
E: Environmental energy transition
S: Social impact
G: Governance

Fortum tax strategy

1. Taxes are always considered early within the business process and in line with the Tax Principles
2. Connecting tax to business at the right time with fit-for-purpose solutions, risk mitigation and responsible behaviour
3. Support investment opportunities with efficient solutions and responsible tax management, and considering efficient deferred tax utilisation
4. Well functioning and defined base processes and clear roles focusing on relevant expertise

Fortum's strategy is the fundamental basis for the Group's tax management and tax strategy. Understanding our tax positions and related key focus areas is essential so that we can optimally support the business operations. To be successful, the tax strategy needs to consider external trends, such as shareholder value creation, regulatory trends, and various other policies that influence taxation. These external trends create complexity and challenges in maintaining clarity and predictability. Therefore, our strategy is strongly connected to our business operations and to our tax principles, focussing on sustainable solutions that support both the businesses and our financial strength.

Fortum's approach to taxation

The Fortum Group Tax Team has been reorganised and is now in line with the new Fortum way of working and our governance policy has been updated accordingly. It is organised by function under the Group Tax Leadership Team. Each function has a leader and a team of people allocated to it.

The Group Tax Leadership team is responsible for the overall strategic and operational management of the Group Tax Team. Roles and responsibilities within the functions are defined to ensure co-ordination and alignment with the Fortum Tax Principles in Fortum Tax Governance.

We utilise the single point of contact concept to align Group Tax with the business, and utilise internal steering meetings as one concept of internal controls.

Promotion of Responsible Tax Management

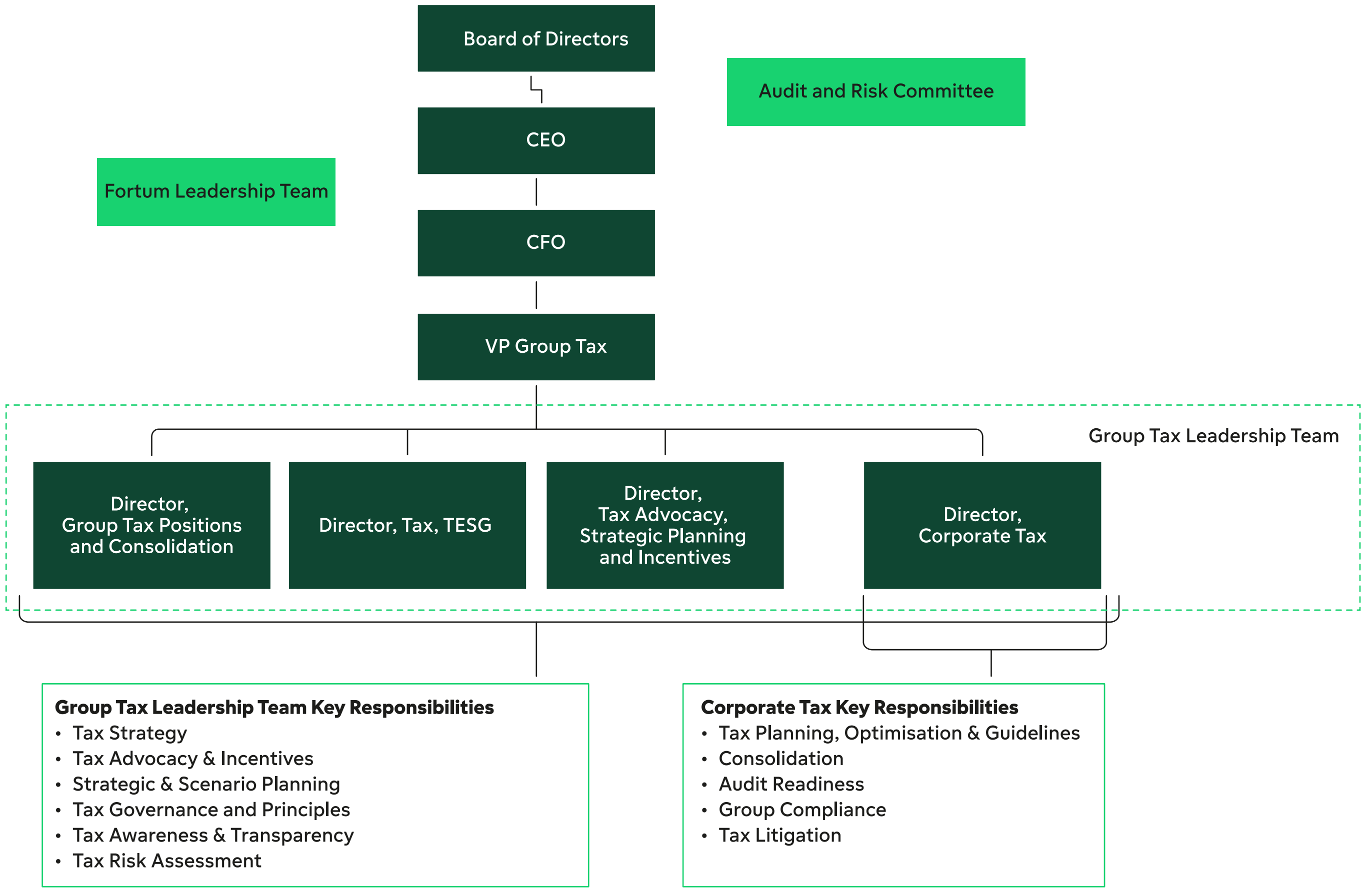
Fortum promotes responsible tax management internally and externally. Here are some examples of this work during 2025.

Internally

- We have developed our e-learning on our Tax Principles which is available for all our employees. We have additionally promoted this in our Finance Networks.

Externally

- Our VP Group Tax, has participated in several industry panels such as Tax Controversy Leaders Seminar.
- Our VP Group Tax has been promoting this in the Finnish Parliament.
- We presented responsible tax principles at Aalto and Turku universities.



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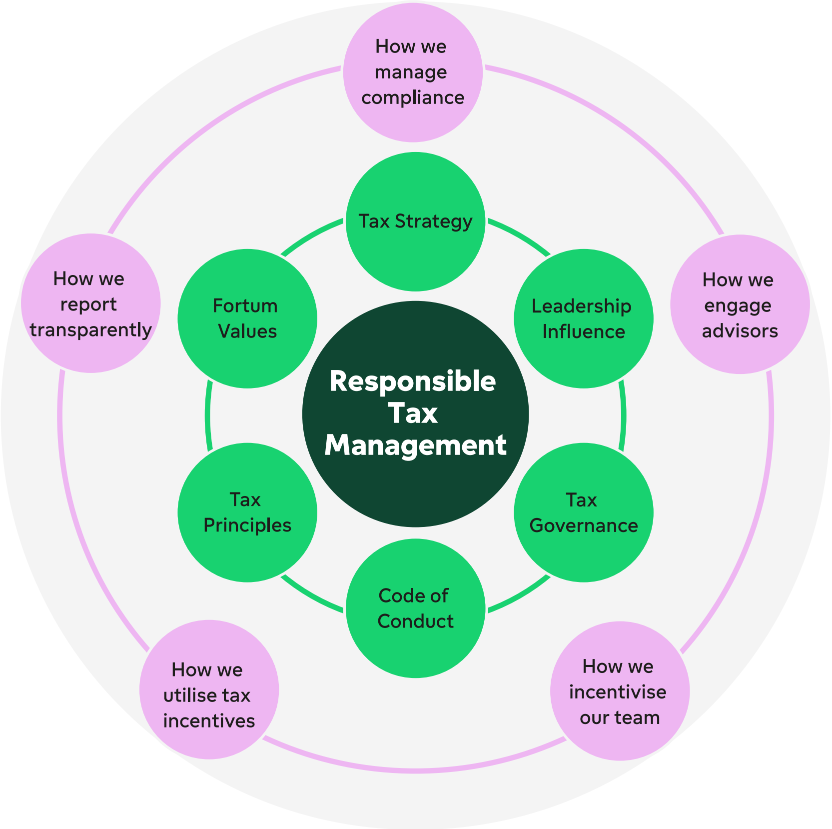


Fortum's tax culture

Responsible tax management is at the core of Fortum's tax culture. Fortum's tax culture is guided by our leadership and ethical principles as well as internal governance structure. It dictates our behaviour towards our tax work and how we approach it. Fortum has a strong ethical corporate culture stemming from our Code of Conduct and our Values, which in turn influence our Tax Principles. Our tax culture is an extension of this and is aligned with our business and tax ethical standards.

Fortum's values – Aim High, With Care and Win Together – are evident in our working environment and culture. For us, this means early engagement and partnering with our businesses to get the best outcomes. We aim for excellence and transparency in all areas of our work, while maintaining the ethos of responsible tax management.

One example of our Code of Conduct and business ethics is reflected in how Group Tax is incentivised. The Fortum Group Tax Team is included in Fortum's normal incentive schemes, both in relation to short-term (annual) and long-term (share-based) programmes. Bonuses are not connected to taxes borne, taxes collected or the effective tax rate. The Group Tax Team bonus targets are related to management of critical tax positions, development of transparency, governance and tax awareness, and are not connected with taxes paid.

Tax risk work

Risk appetite concerning tax planning

Fortum's tax risk appetite is governed by the 'more likely than not' principle. We systematically assess tax risks and uncertainties to ensure compliance and minimise exposure.

Our business and strategies evolve constantly, especially following developments in the European energy sector. Tax strategies do not take priority over commercial objectives. We do not enter into artificial arrangements in order to avoid taxation or to defeat the stated objective of the tax legislation.

The purpose of our tax planning is to ensure efficiency, certainty and predictability of how Fortum's business is treated for tax purposes by partnering with the business at an early stage. In our tax risk work, we focus on:

- Ensuring the business understands Fortum's Tax Principles and approach to tax risk management.
- Ensuring the business understands that the Group Tax Team should be involved throughout transactions, from planning and implementation to documentation, providing needed guidance and requirements.
- Contributing to internal processes that support significant business or strategic initiatives.
- Identifying uncertainties that could lead to non-compliance at an early stage.

The purpose of this is to optimise our tax positions, prevent double taxation, and ensure predictability – without reducing tax payments below what is required by applicable laws.

When uncertainties arise in the interpretation of legislation, we strive to seek clarity from the tax authorities, for example through advance rulings, where necessary and possible, or through open discussion where possible.

However, from time to time disagreements on the tax treatment may arise between us and tax authorities, or even between two different tax authorities. If we believe that our analysis of the tax treatment is correct, based on the 'more-likely-than-not' approach, we will defend Fortum's position in courts.

Risk assessment

Taxes are embedded within the Group-wide risk management process as part of Fortum Enterprise Risk Management (ERM).

We assess uncertainties relating to the taxation of our existing and future businesses on a day-to-day basis and in cooperation with the respective business areas and functions. The main findings and the associated tax risk mitigation proposals are discussed with the business that has initiated the proposal, as well as with the CFO, Fortum Leadership Team and the Board of Directors. This is followed by risk mitigation actions arising from self-assessments, cooperation with the business operations and internal conclusions in the Fortum Group Tax Team.

In addition, the identified tax and other risks are reported quarterly to Fortum's Audit and Risk Committee (ARC) and separately once a year together with the tax strategy review.

> Both taxes borne and collected are considered.

Reporting identified uncertainties and risks

Our Tax Governance Guidelines establish the core Tax Principles and define the responsibilities of each function within the Fortum Group Tax Team. These principles are designed to ensure that tax-related activities across the organisation are aligned with Fortum's strategic objectives and regulatory obligations.

Fortum's internal control framework is built on the COSO model (Committee of Sponsoring Organizations of the Treadway Commission), which provides a structured approach to risk management and control. Within this framework, tax-related controls are specifically tailored to address the key risks identified in our tax functions and processes.

Key tax risks and uncertainties for 2025

As part of our commitment to transparency and stakeholder engagement, we have outlined the main tax-related risks and uncertainties that may have affected our operations in 2025:

1. Complex and evolving tax legislation
Unclear or rapidly changing tax laws continue to increase the complexity and cost of compliance. Misalignment of tax policies across jurisdictions can lead to double taxation of the same income. This creates unintended financial consequences, such as unexpected tax liabilities, and higher operational costs due to increased compliance efforts. Examples include the implementation of the Global Minimum Tax and ViDA rules as well as proposals for new regulations like DEBRA, and BEFIT, which introduce new rules and reporting requirements across the EU and globally.

2. Need for greater tax awareness across functions
Tax issues often arise in core business processes such as procurement, invoicing, and system design. Without proper awareness and ownership, these processes may inadvertently lead to non-compliance. A key example is the EU's VAT in the Digital Age (ViDA) initiative, which will require significant changes in how digital transactions are handled and reported.

3. Direct and indirect geopolitical Impacts
Political instability and changes in strategic business can lead to significant operating losses and tax loss carryforwards, which may be recognised as deferred tax assets, provided there is an assessment that such assets will be utilised in the future. However, in uncertain environments, there is a risk that these deferred tax assets (whether newly created or existing) may not be usable or their deductibility may be challenged, potentially resulting in double taxation, lost financial benefits and reduced earnings per share. This reduces overall profits and increases tax cost.

Our **key risk mitigation actions** include:

- Active communication with policy makers and in public hearings.
- Taking a proactive approach to our business, total tax position and the uncertainties we identify.
- Seeking confirmation from tax authorities, when possible.
- Active participation in developing finance processes that shape tax processes.
- Work on transparency, awareness and development of resources.
- Focussing on basic business process development and IT development.

Assessment and reporting of uncertain tax positions (UTPs)
We conduct quarterly assessments across all tax types to determine whether any positions give rise to uncertain tax treatments. Tax assets or liabilities resulting from such treatments are evaluated using a "probable" recognition threshold – meaning they are recognised only if it is more likely than not that the tax treatment would be upheld by a court.

As of the reporting date, Fortum has assessed its tax positions and determined that there are no uncertain tax positions that require recognition or disclosure in the financial statements. This assessment is based on the company's evaluation of applicable tax laws and regulations and Fortum Tax Principles, as well as its historical tax compliance. Further, Fortum has no material tax controversy nor litigation with risk of increased tax cost ongoing because we have paid the assessment amounts on current cases.

Tax disputes and engagement with Tax Authorities

In line with our Tax Principles, Fortum protects shareholder value by pursuing tax cases in court when we believe that tax legislation does not align with the purpose of the law, when the law or judicial practice is significantly ambiguous, or when we disagree with the tax authority in a strategic topic for us.

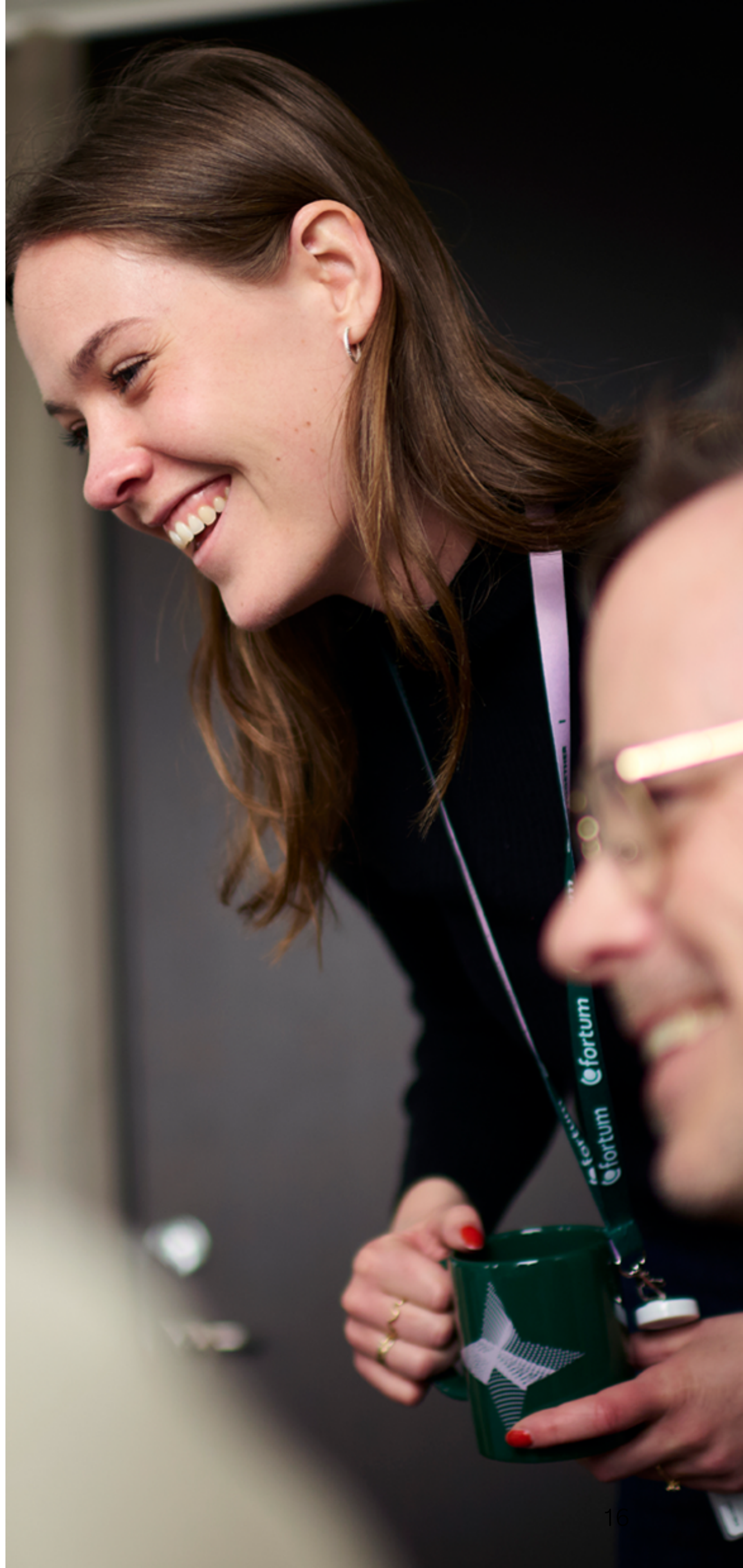
Court processes typically last for several years. Fortum has some cases ongoing in courts. In Sweden, in June 2023, Fortum received a negative decision from the Court of Appeal in Stockholm regarding a case in which damages are claimed from the Swedish State. Fortum applied for leave to appeal to the Supreme Court in August 2023; and in May 2024, the Supreme Court did not grant the leave to appeal. As our arguments on referring the case to the European Court of Justice (ECJ) are still strong, Fortum has appealed the case to be reopened by the Supreme Court in Sweden. Fortum has paid all taxes related to this issue.

Secondly, Fortum has complaints pending in the EU Commission relating to the hydro property tax and the high threshold Swedish courts have when referring cases to ECJ. Fortum has requested the Commission to analyse the Swedish Supreme Administrative Court’s compliance with EU law, as the Court does not refer relevant cases to the EU Courts. All taxes related to this topic are paid.

Thirdly, Fortum is currently engaged in an ongoing tax dispute with the Swedish Tax Authority. The case, which began in 2025, concerns a transfer pricing matter relating to the 2023 fiscal year. Fortum paid the additional tax assessed by the Swedish Tax Authority as required (approximately EUR 7 million including the interest and penalties), but continues to disagree with the underlying basis for the assessment. Fortum considers its position well-supported and expects a resolution in accordance with the applicable legislation and in Fortum’s favour. This opinion is supported by external advisors. Fortum will submit a formal appeal in 2026 to ensure full protection of its rights.

Fortum is actively discussing interpretation of tax law with tax authorities in line with our Tax Principles. We aim to improve predictability of our taxation. Examples of our actions are:

- In 2024 Fortum requested an advance ruling from the Finnish Tax Authority to clarify whether the Finnish windfall tax is compliant with EU Regulation. The representative of the Finnish State has applied for leave to appeal to the Supreme Administrative Court on the positive decision Fortum received. The leave to appeal request was denied in February 2026 and the decision of the Helsinki Administrative court was upheld and the law was unenforceable.
- In 2025 Fortum has asked two separate rulings on the tax treatment of interest costs. Both applications are still pending.
- In 2024 Fortum has discussed the VAT treatment of certificate related transactions. Tax authorities confirmed Fortum's understanding.
- Fortum is also engaged in a bilateral advance pricing agreement process to validate the arm’s-length conditions of its intra-group financing arrangements.



Fortum's commitment to responsible Tax Principles and transparency

Fortum has been building on responsible tax management for more than a decade. In 2012, we published our first total tax contribution report. In 2018, we committed to The B Team tax principles, and our Board of Directors approved Fortum's Tax Principles. We actively promote responsible tax management and share our thoughts with our peers and other organisations. We cooperate with tax authorities and engage in discussions on responsible tax management with universities. In 2025, we presented responsible tax principles at Aalto and Turku universities.

The B Team is a global collective of business and civil society leaders driving a better way of doing business for people and the planet. Read more at bteam.org. Together with leading experts, The B Team has developed a framework for approaching tax with a set of Responsible Tax Practices. We contributed to The B Team, the European Business Tax Forum's (EBTF) and the Tax Executives Council's common effort for tax governance best practices – Best practices for good tax governance paper. Since 2018, we have worked to align our tax approach with The B Team Responsible Tax Practices and to support their work.

For the benefit of our stakeholders, we have carried out a review of our alignment with The B Team tax principles for 2025 to ensure compliance with our Tax Principles. The results are presented on page 18. We assessed different parts of The B Team principles of good tax governance. Even though we assessed most areas as green, i.e. compliant, we regard tax governance, structure, incentives and supporting tax systems and transparency to be areas that are still developing, so we highlighted these as partially compliant. As new information emerges and compliance requirements increase, we anticipate ongoing development in these areas.

Therefore, we are working to refine our tax approach to have a sharper focus on the most critical issues for Fortum. In 2024 and 2025, we made efforts to improve the awareness of the Tax Principles within Fortum.

In 2025, we participated in The B Team Responsible Tax Practices peer review session, which focused on our EU PCbCR disclosure.

In 2025, Fortum was again awarded the **Fair Tax Mark** accreditation. We are very proud of this continued achievement, as it independently verifies our commitment to transparency. We want to continue being a leader in responsible tax management and transparency and to continue building more transparency, trust and confidence with stakeholders. We believe that this independent third-party verification helps us with this.

Furthermore, as part of our ongoing commitment to responsible tax conduct and transparency, we have once again sought a scoring assessment from CSR Europe Tax Responsibility and Transparency Index. Our improved score from the previous assessment demonstrates the value and effectiveness of our continued efforts.

Fair Tax® accredited

Tax Responsibility and Transparency Index

	B Team – Self-assessment of our responsible tax principles	Fair Tax Foundation – responsible tax conduct	CSR Europe – tax responsibility and transparency index
Focus area/ mission	• Responsible Tax Principles covering a holistic approach to tax management • Governance	• Transparency • ESG approach to responsible tax conduct • Build reputation and trust with various stakeholders	• Tax responsibility and transparency overall score assessed by co-developers of the Index, Fair Tax Foundation
Fortum's approach	• Board approved Tax Principles implemented • Annual self-assessment	• Awarded the Fair Tax Mark based on their independent assessment	• Achieved a score of 76/100 on the index based on their independent assessment
Benefits/ outcomes	• Tax Principles are approved at the highest level and followed Group wide • Improved responsible tax management and governance	• Confirmation that our public reporting on taxes is to a high standard • Builds trust with stakeholders • Improved reputation	• Provides a score that benchmarks us against others • Builds trust with stakeholders • Improved reputation

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Accreditations and self-assessment results

The B-Team Self-Assessment with Tax Principles for the financial year 2025

Function	Assessment	Conclusion
Governance	Compliant but room for improvement	We assessed governance-related issues as compliant, as our tax strategy and tax principles are approved by the top Fortum leadership and tax risks are included in the Group-level risk management work. In addition, tax risks are reported annually to Fortum Audit And Risk Committee. We continue our efforts to raise tax awareness of Tax Principles and Governance. We have reviewed and developed our tax policies in order to create better understanding, awareness and controls.
Compliance	Compliant	We assessed our processes concerning compliance as compliant with respect to self-assessment.
Structure	Compliant but room for improvement	We assessed structure-related issues as compliant, but we recognise that our Tax Principles extend to our relationships with employees, customers, and contractors, as third-party controls can be assessed as compliant but room for improvement. We do have some processes to assess third parties, but they are not always systematic. We identified the need to further consider third-party assessment and controls when entering into cooperation with them.
Relationship with tax authorities	Compliant	We assessed issues related to our relationship with tax authorities as being in line with The B Team principles.
Incentives and supporting tax systems	Compliant but room for improvement	We assessed issues related to our incentives and supporting tax systems as being in line with The B Team principles. The B-team requires that we would voluntarily give our data relating to tax incentives to tax authorities. However, we haven’t utilised such tax incentives that would require the need for us to build a process for this. We have developed our definition of tax incentives and created guidelines to be followed. We will establish a process for reporting tax incentives if utilised and have done some investigation as to what this process would look like..
Transparency	Compliant but room for improvement	We assessed our transparency-related issues as mostly being in line with The B Team principles. We have taken additional steps in open reporting about our structure in our EU PCbCR and tax footprint. However, we assessed that we don’t have a systematic reporting tool with clear definitions for financially material tax incentives. Consequently, we assessed this section as partially compliant. As a final improvement area, we considered that some parts of operations are disconnected from tax issues, or we are not clear enough with our message in the area of advocacy approach. For this reason, we assessed this aspect as compliant but room for improvement. in light of B Team principles. Clarity and closer cooperation with public affairs naturally would be the improvement in this area.

Compliant   Compliant but room for improvement

Tax responsibility and transparency index scorecard report

	Company Score	cf Mean Average Score (All)	Index Rank (All)	cf Mean Average Score (Sector)
POLICY & STRATEGY	13.5/15	11.4/15	Joint 1st	13/15
MANAGEMENT & GOVERNANCE	13/20	12.6/20	Joint 11th	14.3/20
STAKEHOLDER ENGAGEMENT	9.5/15	7/15	5th	10.1/15
TRANSPARENCY & REPORTING	21/25	11.6/25	Joint 1st	19.1/25
CONTRIBUTION & NARRATIVE	19/25	12.1/25	Joint 1st	15.3/25
TOTAL	**76/100**	**54.6/100**	**3rd**	**71.8/100**

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Fortum as a taxpayer – value creation

One of the ways Fortum contributes to societies is by paying taxes in countries where we operate. In this section we explain Fortum's contribution through taxes. Operating in the energy sector, our total tax contribution is not limited to corporate income taxes but includes a vast array of excise, transactional, employment, and property taxes.

> Our total tax contribution includes corporate income taxes, as well as a vast array of excise, transactional, employment, and property taxes.

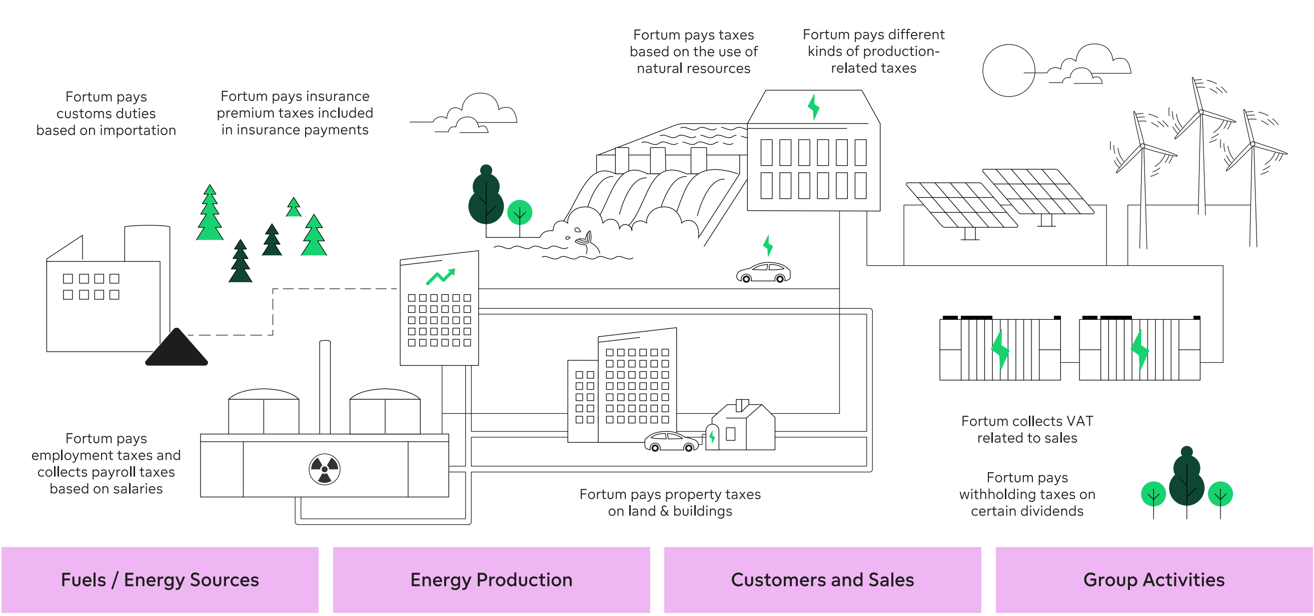
We pay taxes at different points of our value chain. Value creation within the value chain is the basis for paying taxes. In this picture we illustrate our tax footprint in Fortum's value chain and the many instances where taxation occurs. In addition, Group activities also create taxing points.

We report and pay income taxes where profits are generated and where we have operations. Our tax contributions may fluctuate from year to year for various reasons, such as the level of investments or divestments of assets or shares and overall result level. VAT and excise taxes are typically reported and paid based on sales, purchases, usage or consumption.

Fortum's strategy is to manage its operations in local energy markets effectively. Producing and selling energy – electricity and heat – are inherently local activities. Our ability to generate profit depends on our investment decisions, our existing power plants and facilities, and the achieved power price level. It's important to clearly identify the functions participating in the business operations in order to define where profits are generated.

Fortum's value chain is taxed at multiple points and result in taxes borne and collected

Fortum pays income taxes based on taxable profit



The key profit driver depends on power prices, investments and plant portfolios, such as hydro, nuclear, wind, solar. We have tax obligations, like Pillar Two and CFC, which are based on local profits that are taxed on the parent company level. We have assessed that no top-up tax is required for Pillar Two, and taxes on CFCs are reported later in this report. Aside from this, all our tax contributions are local; taxes on production and property are an important part of our tax contribution. More than 98% of our total tax contribution is in countries where we have local production and assets related to production. The remaining part of taxes borne refers to local profits on sales, financing, and service operations representing our international business operations.

> We are targeting net-zero emissions and decarbonisation while actively managing our other environmental impacts. This will impact out tax contribution in future years as tax bases will change.

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Relationship between value chain, value creation, and tax contribution

Our investments in production plants generate power for use by families and businesses. Our investments in low-carbon power also generate value in the long-term for our various stakeholders, such as shareholders, customers, states, municipalities, and employees, as we deliver sustainable power and heat and create employment, which in turn drives tax payments where we do business.

> Our investments generate value in the long-term for stakeholders.

Those taxes, whether based on profits, asset values, fuel usage or something else, need to reflect the cash or revenue generated by the business.

As business is the origin of the tax contribution, it's important to design the tax system in a way that it supports future value creation and the decarbonisation of power production, whether we're looking at day-to-day operations, windfall profits or new inventions and investments.

The traditional model of energy production is now supported with innovations and digital solutions. This changes the core business model and the future value chain in the case of capital-intensive businesses. Meeting the global climate targets will require new energy sources and will give rise to new technologies and solutions, like the use of hydrogen. This will require substantial new investments and a sustainable tax regime that supports these investments on a long-term basis.

Value creation and tax contribution

Our total tax contribution, being taxes borne and taxes collected, in 2025 was EUR 832 million (2024: 893), of which EUR 290 million (2024: 325) was related to taxes borne and EUR 542 million (2024: 568) to taxes collected.

Finland and Sweden were our biggest production countries. In 2025, taxes borne were EUR 105 million (2024: 153) in Finland and EUR 126 million (2024: 123) in Sweden.

Taxes borne include corporate income taxes (excluding deferred taxes), production taxes, employment taxes, taxes on property, and the cost of indirect taxes payable or refundable for the reporting period. Taxes borne are indicative of cash taxes paid for the period; however, they may be paid in that period or after.

The majority of taxes borne are paid out of our profits and within the tax year or the year immediately after. Fortum does not have any long-term liabilities owed to tax authorities. If we did, we would disclose them separately.

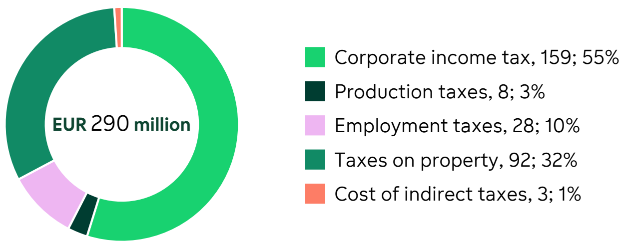
Taxes collected include VAT, payroll taxes, excise taxes and withholding taxes. While income taxes are paid on taxable profit, Fortum also pays other taxes based on, for example, fuel usage and the value of real estate. As a major part of our taxes are not based on profits, our total taxes borne in relation to our profit excluding taxes borne (i.e. total tax rate) will increase if the profit level decreases, due to tax costs remaining the same but profits decreasing.

The five-year average for corporate income taxes borne was 12.9% for the years 2021 to 2025. The rate is calculated on restated data excluding Russia and Uniper.

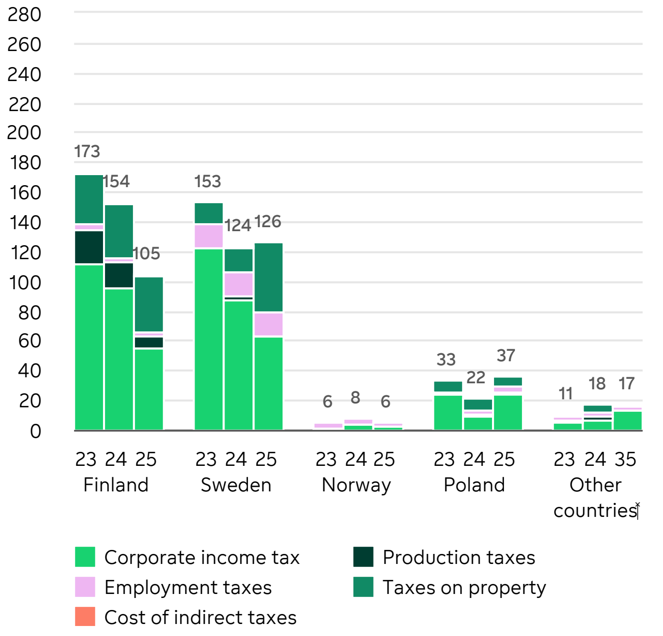
Fortum Group's dividend policy is to have a payout ratio of 60–90% of comparable earnings per share. This compels us to find efficiencies and profitability. Total tax contribution is our contribution to the societies where we operate. Our ratio of dividend distribution in comparison to total tax contribution (including withholding taxes on our external dividends) was 137% in 2023, 141% in 2024 and 80% in 2025. The 2025 figure is based on Fortum's Board of Directors' proposal to the Annual General Meeting 2026.

Dividend policy is one of our key shareholder value drivers for Fortum. Therefore, the key purpose of our legal structure is to protect the Fortum Corporation balance sheet, ensure appropriate income flow to Fortum Oyj and ensure efficient financing of our operations wherever they are located. When choosing the location, stability and predictability are key factors for us. For support operations, our location preference is EU euro-denominated countries. All our subsidiaries, associates and joint ventures are listed in our Financial Statements. For more details, see the section Total taxes by country.

Total taxes borne 2025, EUR million and %



Taxes borne by country, EUR million



The nature of the business and impacts to total tax contribution

Our tax contribution reflects the nature of our business in each country where we have operations. As a general rule, the larger our asset and operating footprint is in a country, the more we contribute to local communities and governments in the form of different taxes.

> Our tax contribution reflects the nature of our local business.

Correspondingly, operations that have a lighter footprint tend to have a lighter tax contribution, but they are not necessarily comparable. It is important to note that Fortum pays a variety of different taxes, and our overall contribution goes beyond corporate income tax. In particular, we pay significant amounts in employment and property taxes.

Our operations and thus also our tax contributions may vary by country, reflecting different operations, headline tax rates and other reliefs and incentives that we may utilise where appropriate. In 2025, Fortum had a presence in 18 countries. The nature and scope of our tax footprint depends on our operational footprint, while the size of our tax contribution depends on the size of our operations.

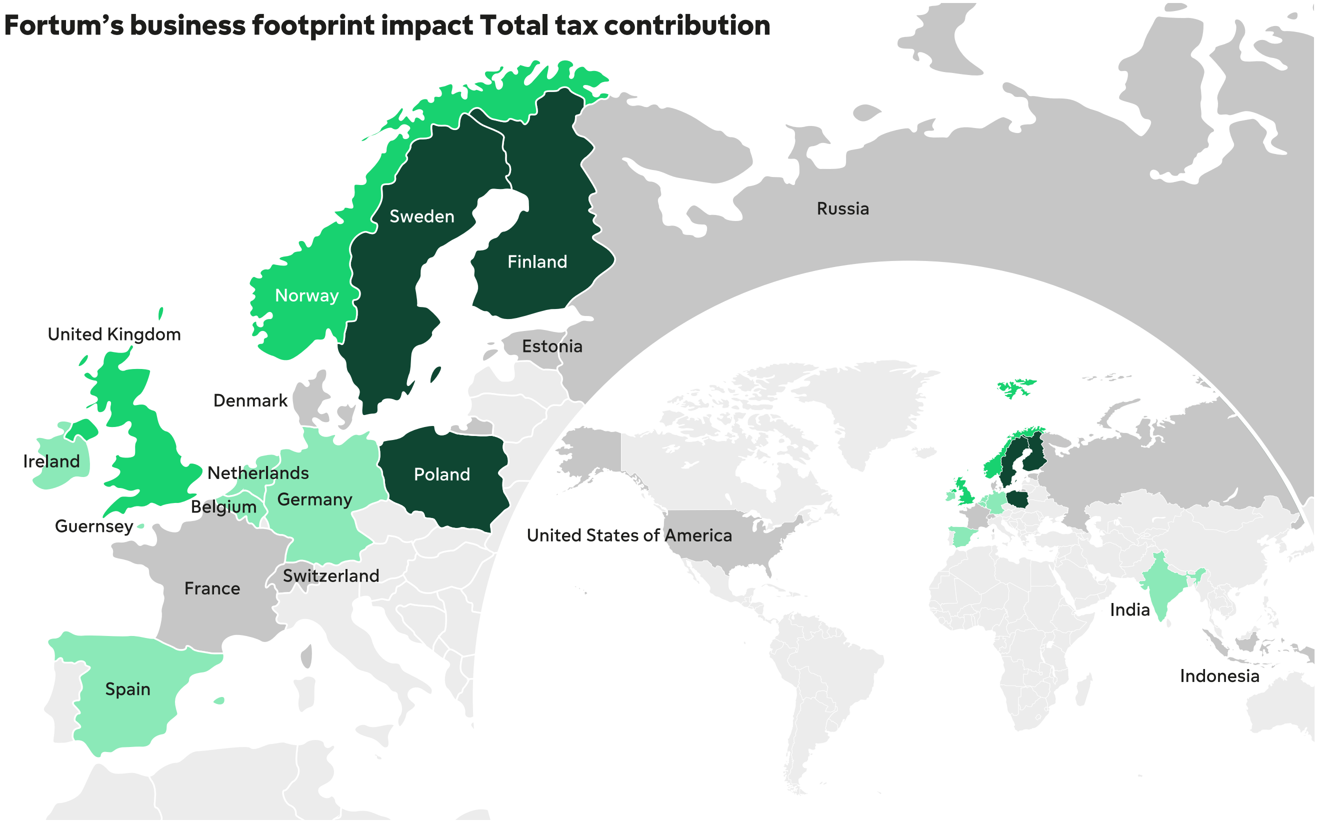
We support the European Business Tax Forum (EBTF) initiative dedicated to raising the standards of the public tax debate and the focus on Total Tax Contribution, including both taxes borne and taxes collected. We have embraced this concept in this report, by reporting detailed tax contributions by tax and by country. Read more about EBTF at https://ebtforum.org/ttc/.

You can find country-specific information about our operations on our website: Country fact sheets | Fortum.

We have classified our countries of operation as heavy, medium and light in relation to their business presence. Tax contributions within each group are more comparable to each other than tax contributions between the different groups.

When considering the size of our total tax footprint, we use materiality in our financial reporting to select which countries to report stand-alone. See our taxes borne and collected later in this document.

Fortum's business footprint impact Total tax contribution



Business footprint

- **Heavy:** Production operations having material assets in a country, resulting in taxes on profit, property, production, as well as other multiple taxes collected such as VAT, payroll, and withholding taxes.
- **Medium:** Services, sales, and trading operations with a wider customer base but no material fixed assets. VAT obligations on top of corporate income tax, and salary withholding obligations.
- **Light:** Limited number of customers and operations, typically small business and support functions to heavy operations, mainly financial assets and personnel. Taxes are mainly corporate income tax, and salary withholding tax obligations.
- **Minimal activities:** Countries where we have minimal operational presence, deconsolidated entities (Russia) or where operations have ceased during year. Resulting mainly in Corporate income tax, Vat obligations and salary withholding tax obligations.

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Fortum's tax contribution in 2025

This section presents Fortum's total tax contribution. We also highlight the taxes we pay on a country-by-country basis, supplemented with other key performance indicators that offer different views and ways of measuring our overall contribution.

Disclosures in Financials Statements

Fortum publishes tax information and disclosures on income tax as part of its Financials. The condensed part of it is presented below with necessary commentary. Please see Note 12 'Income tax expense' and Note 28 'Income taxes on the balance sheet' in the Consolidated Financial Statements for further information.

In addition to those disclosures, we present the Comparable effective Income tax rate reconciliation and the Current Income tax rate reconciliation and the related commentary.

Effective income tax rate

Fortum Group's effective income tax rate, according to the income statement, was 18.5% (2024: 17.1%). This tax rate includes all items that are excluded from comparable effective tax rate.

The effective income tax rate was mainly impacted by the differences in tax rates in other jurisdictions, other items affecting comparability, and the share of profits from associates and joint ventures. Profits from associated companies and joint ventures are recorded based on Fortum's share of profits after tax; and, therefore, their tax impact is not visible in Fortum's income statement. See Note 12 of the Fortum Group Financial Statements 2025 for a full reconciliation.

The effective income tax rate and comparable effective income tax rate reflect the income tax expense recognised in the income statement, including deferred tax expense.

Key tax indicators, %

	2025	2024	2023
Effective income tax rate	18.5%	17.1%	4.3%
Comparable effective income tax rate	18.8%	19.1%	19.1%
Weighted average applicable income tax rate	17.4%	19.7%	21.0%
Current income tax rate	16.9%	17.0%	18.5%

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Comparable effective Income tax rate reconciliation

EUR million	2025	%	2024	%	2023	%
Profit before tax	**936**		**1,399**		**1,583**	
Profits from associated companies and joint ventures	-56		-19		-59	
Tax exempt capital gains or losses	2		-183		-1	
Other items affecting comparability	-14		-55		-115	
Profit before income tax decreased by profits from associated companies and joint ventures and items affecting comparability	**869**		**1,141**		**1,408**	
Tax calculated at nominal Finnish income tax rate	-174	20%	-228	20%	-282	20%
Differences in tax rates in other jurisdictions	23	-2.6%	17	-1.5%	-14	1.0%
Tax exempt income and other non deductible expenses	-1	0.1%	4	-0.3%	11	-0.8%
Tax effects of changes in value and non-recognition of deferred taxes	-3	0.4%	-5	0.5%	-5	0.4%
Adjustments recognised for taxes of prior periods	-1	0.2%	-5	0.4%	0	—%
Other items	-7	0.8%	-1	0.1%	21	-1.5%
Comparable income tax expense	**-163**	**18.8%**	**-219**	**19.1%**	**-269**	**19.1%**
Taxes on other items affecting comparability	-10		-20		201	
Income tax expense	**-173**		**-239**		**-69**	

Comparable effective income tax rate

In line with Fortum's reporting of comparable profit (see the note 7 "Comparable operating profit and comparable Net profit" in the Consolidated Financial Statements), we present the comparable effective income tax rate. This more accurately represents the Group's tax position compared to the effective income tax rate when analysing the current period in relation to previous periods. Certain elements impacting comparability and their tax impacts, such as items affecting comparability, adjustments on finance costs - net as well as share of profits from associated companies and joint ventures are not included in the comparable effective income tax rate.This increases comparability between years, as one time items are excluded. The comparable effective income tax rate for 2025 was 18.8% (2024: 19.1%).

The table "Comparable effective Income tax rate reconciliation" explains the difference between the statutory income tax rate in Finland (20%) compared to the rate at which Fortum is taxed (18.8%) on its comparable profit before income tax excluding share of profit/loss from associated companies and joint ventures. The main driver affecting the comparable effective income tax rate is the differences in nominal tax rates in other jurisdictions and the Finnish tax rate.

Current Income tax rate reconciliation

EUR million	2025	%	2024	%	2023	%
Profit before taxes	**936**		**1,399**		**1,583**	
Income tax at Finnish rate (20%)	-187	20%	-280	20%	-317	20%
Differences in tax rates in other jurisdictions	24	-2.6%	4	-0.3%	-16	1.0%
Tax expense based on weighted average applicable tax rate	**-163**	**17.4%**	**-276**	**19.7%**	**-332**	**21.0%**
Tax impact from permanent items	**-4**	**0.4%**	**49**	**-3.5%**	**405**	**-25.6%**
Intangibles	-3	0.3%	-3	0.2%	-0	0.0%
PPE	4	-0.5%	-2	0.1%	-4	0.3%
Derivatives	-4	0.4%	-11	0.8%	37	-2.3%
Provisions	3	-0.3%	1	-0.1%	-3	0.2%
Interest carryforward	-12	1.3%	-39	2.8%	-84	5.3%
Other tax impact from temporary items	-36	3.9%	43	-3.0%	-160	10.1%
Total tax impact from temporary items	**-47**	**5.0%**	**-11**	**0.8%**	**-214**	**13.5%**
Tax impact from changes in TLCF (- created/ +used)	59	-6.3%	2	-0.2%	-149	9.4%
Income tax expense for current period	**-156**	**16.7%**	**-236**	**16.9%**	**-290**	**18.3%**
Other tax charges	-2	0.2%	-2	0.2%	-3	0.2%
Current tax in income statement	**-158**	**16.9%**	**-238**	**17.0%**	**-293**	**18.5%**

Current income tax rate

Fortum Group's current income tax rate, according to the Income Statement, was 16.9% (2024: 17.0%). The "Current Income tax rate reconciliation" table explains why the current income tax rate (16.9%) differs from the Finland's nominal tax rate (20%). This indicator includes only the current tax expense accrued in Income Statement for current period. This table includes the reconciliation of the weighted average applicable income tax rate 17.4% (2024: 19.7%).

The current Income tax rate differs from the effective Income tax rate because it reflects not only permanent items, like tax exempt gains and losses but also impacts from temporary differences. These impacts include, among others:

- Property Plant and Equipment (PPE) which is caused by different depreciation rules for tax and accounting purposes,
- Interest carryforwards created by statutory limitations on interest deductibility tied to taxable EBITDA under EU ATAD rules,
- Derivatives taxed upon realisation, and
- Other tax impacts from temporary items related to various income or expenses that are not taxable or deductible in the current period but will be later, such as the bad debts losses in 2023 related to write downs of Russian loans.

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Forecast of comparable effective tax rate

The comparable effective income tax rate for Fortum is estimated to be in the range of 18–20% for 2026. There is political agreement in Finland to decrease the corporate income tax rate from 20% to 18% from the beginning of year 2027. The official law is not yet in place so we have left out the guidance for the comparable effective tax rate for 2027 for now. Our estimate is that the tax rate change would result in a decrease of approximately one percentage point in the Group's effective tax rate and comparable effective tax rate. Fortum's comparable effective tax rate is impacted by the weight of the comparable profit in different jurisdictions and differences in standard nominal tax rates in these jurisdictions. The tax rate guidance excludes items affecting comparability.

> Deferred taxes represent future tax amounts the company expects to pay or recover.

Fortum continues to have a material deferred tax liability on property, plant and equipment, owing to its investments in noncurrent assets. These assets are depreciated more rapidly for tax purposes than for accounting purposes, resulting in lower current tax payments at the start of an asset's lifetime and higher tax payments at the end of its lifetime. This difference results in a deferred tax liability. More information on deferred taxes can be found in the Financial Statements 2025.

Fortum's overall net deferred tax asset reduced during 2025. The main changes are related to decreased deferred tax on derivatives and the use of deferred tax asset on tax losses carryforwards. The deferred tax asset on tax loss carryforward is mainly in Ireland, resulting from the Uniper divestment in 2022 and Russia-related impairments in 2022 and 2023. See Note 28 'Income taxes on the balance sheet' in the Consolidated Financial Statements for further information.

Effective tax rate (ETR), Current income tax rate (CTR), Corporate Income tax borne vs Cash taxes paid

Different stakeholders require different calculations of tax expenses in a year.

ETR and income tax expense Source: Income Statement	**ETR 18.5%** **EUR 173 million**	In accordance with IFRS® Accounting Standards, the reporting of income tax expense includes current and deferred taxes for current period and adjustments to prior periods
CTR and Current income tax expense Source: Income Statement	**CTR 16.9%** **EUR 158 million**	CTR and Current income tax expense refers to the tax expense accrued in relation to the reporting period. These taxes may be paid in the same or subsequent periods, as required by law. This differs from Corporate incomes taxes borne, as it excludes prior year adjustments.
Corporate income tax borne Source: Tax Footprint	**EUR 159 million**	Corporate income tax borne in the tax footprint refers to the tax expense accrued in relation to the reporting period, including adjustments to prior years. These taxes may be paid in the same or subsequent periods, as required by law
Cash taxes paid Source: Tax Footprint - EU PCbCR report	**EUR 147 million**	Cash taxes paid, as reported in the EU PCbCR, refer to the cash taxes paid to a tax authority in a period. The tax expense may have been incurred in that period or in a different one.

Deferred taxes on the balance sheet

EUR million	01 January 2025	Change 2025	31 December 2025
Intangible assets	-55	0	-55
Property, plant and equipment and right-of-use assets	-365	-13	-378
Pension obligations	-5	-7	-12
Provisions	-28	-5	-33
Derivative financial instruments	-14	23	9
Tax losses and interest carry-forward	907	-21	886
Other	19	14	33
Net deferred tax liability	**459**	-8	**451**

Total taxes

Taxes borne indicate different taxes that Fortum pays for the period. In 2025, Fortum's taxes borne were EUR 290 million (2024: 325). Taxes borne includes corporate income taxes (excluding deferred taxes), production taxes, employment taxes, taxes on property, and the cost of indirect taxes. Production taxes include also taxes on production and on property, which we have paid through purchased electricity from associated companies.

The total tax rate indicates the burden on the Fortum Group's profit before these taxes are borne.

> Total tax rate was 27.2% in 2025

Fortum administers and collects different taxes on behalf of governments and authorities. Such taxes include VAT, excise taxes on power consumed by customers, payroll taxes and withholding taxes. The amount of taxes collected by Fortum in 2025 was EUR 542 million (2024: 568).

Total taxes, %

	2025	2024	2023
Total tax rate	27.2%	21.4%	22.2%

Pillar Two impact – Transitional safe harbour and top-up tax 2025

The Group has been within the scope of the OECD Pillar Two model rules for global minimum tax since 2024. The Group also complies with domestic minimum top-up tax legislations that are enacted in its operative countries.

Under the legislation, the Group must pay a top-up tax if its jurisdictional GloBE effective tax rate – calculated according to Pillar Two rules – falls below the 15% minimum rate and the transitional safe harbours defined in Pillar Two legislation are not met. Transitional safe harbour rules include three tests that can be applied on a jurisdictional basis to exempt the company from detailed compliance and any top-up tax in the jurisdiction. Meeting the criteria for any of the tests qualifies the jurisdiction for safe harbour during the transitional period.

According to Fortum's assessment, all of its operative countries, except for Ireland, Norway and Guernsey, are in the safe harbour for 2025. Fortum must complete more extensive compliance requirements in these countries, however, we are not exposed to paying top-up taxes due to specific adjustments in the Pillar Two legislation. We regularly monitor the guidance and instructions, and ask for tax authority clarifications where possible, in line with our tax principles.

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Total taxes by country

In this section, we provide a view of our total tax contribution and other financial information on an individual country basis with supporting narratives on the major business and operational impacts to our total tax contribution.

We have selected and developed key indicators that reflect the nature of our business operations and the related taxes. As Fortum’s operations are capital-intensive and have a long lifetime, the net assets, being stated capital and accumulated earnings, have been selected as the best determinant of our value creation in each country. Our operations are not labour intensive, nor is revenue the most relevant base for a value creation indicator. Therefore, for our operations, the tables on pages 28–30 present assets used in operations, along with taxes borne and taxes collected for the twelve most significant countries of operations.

The source of the data is the consolidated numbers in accordance with IFRS® Accounting Standards. The source for some KPI's vary, as detailed in the footnotes of Total Tax Contribution table. To ensure a good understanding of our value creation, we also present interest-bearing loan receivables, as financing is crucial for the success of our operations. We believe these are the best determinants of value creation for our operations. You can find country-specific information about our operations on our website: Country fact sheets | Fortum.

Countries of interest

Finland

A large share of Fortum’s Nordic electricity generation and electricity customers are in Finland, which generates the majority of Fortum’s income.

In 2025, achieved power prices and production volumes were lower compared to 2024, which primarily accounts for the decrease in taxable income. In 2025, there were no major changes in the financial position compared to 2024. In the Consumer Solution business, profitability improved, whereas lower profits in generation decreases, which resulted to the profit before tax EUR 333 million (2024: 528, 2023: 934). The corporate income tax borne decreased accordingly to EUR 55 million (2024: 96, 2023: 112). The fluctuation in corporate income taxes is also usually due to changes in the value of derivatives, which are subject to tax in different periods. Derivatives are financial instruments used to mitigate risks and costs associated with underlying assets or transactions. Their value moves with underlying market rates for interest, currencies or commodities, this change in value is recognised in the Income Statement. Common examples for Fortum include instruments related to currency exchange rates or future power prices. However, in 2025, the effect of derivatives on taxable income is immaterial compared to earlier years.

In 2025, the total tax contribution decreased to EUR 271 million (2024: 362, 2023: 290), primarily due to a decrease in net VAT. The decrease in sales VAT was mainly as result of lower electricity prices compared to 2024 and a mild winter. In addition, the divestment of the Waste Solutions business reduced both input and output VAT as taxable transactions decreased, and also lowered production taxes. The closing of the last coal-fired unit in Finland in 2024 decreased the amount of paid production taxes. The total tax rate was 27.4% (2024: 26.2%, 2023: 17.4%).

Sweden

Fortum is one of the major energy companies in the Swedish market with a strong presence in fossil-free power generation (mainly hydro and co-owned nuclear power) and electricity sales.

In 2025, production volumes and electricity prices decreased from 2024. Although profitability improved in the Consumer Solutions business, the decrease in power prices and volumes together with the increase of property taxes on power plants substantially decreased the total profit before tax to EUR 215 million (2024: 309, 2023: 652). The corporate income tax decreased to EUR 63 million (2024: 88, 2023: 122). Corporate income tax borne during 2023–2025 accurately reflects the pre-tax profit levels.

The total tax contribution increased to EUR 231 million (2024: 202, 2023: 318), mainly comprised of increase in the net VAT and taxes on property which increased by EUR 31 million in 2025. The increase in net VAT was primarily driven by a decrease in input VAT compared with 2024. The reduction in input VAT amounts mainly relates to Hydro Generation. The total tax rate was 45.2% (2024: 35.8%, 2023: 22.5%). In 2025, property taxes increased significantly due to the update of the valuation of tax bases in the energy sector, which contributed to the increase in the total tax rate.

Norway

A major part of the operations in Norway belongs to Consumer Solutions. Profitability in Norway remained negative in 2025 being EUR -23 million (2024: -23, 2023: -30). The main profit driver is the sales margin on electricity sales. Although power price increased during 2025, the profitability remained negative due to various reasons, such as, low EBITDA.

As in 2023-2024, the limitations on interest deductibility tied to taxable EBITDA in 2025 increased the taxable income, realising corporate income tax expense of EUR 3 million (2024: 4, 2023: 2). Interest expenses in Norway can be carried forward for 10 years and we expect to utilise them before their expiration. The VAT on sales and purchases increased mainly due to higher electricity prices in 2025 compared to 2024, however net VAT reduced.

Poland

Operations in Poland consist mainly of Consumer Solutions and Generation segments. Profitability improved significantly in Consumer Solutions and slightly decreased in Generation. Profit before tax in 2025 was EUR 90 million (2024: 85, 2023: -66). In 2023, there was a significant loss due to fair value changes in derivatives. Corporate income taxes increased to EUR 24 million (2024: 10, 2023: 24). The year-to-year changes are mainly due to timing differences in what can be deducted or taxed under local rules, such as derivatives impacts in 2023, cost/revenue recognition or interest deduction. In 2023, Poland had a prior year adjustment, which increased the corporate income tax, although the profit before tax was negative. In addition, payroll taxes increased due to higher number of employees in 2025 mainly due to the acquisition in of Orange Energia Sp. z o.o. Total tax rate for 2025 was 35.4% (2024: 23.0%, 2023: N/A). Total tax rate was negative in 2023 due to negative profit before tax.

Ireland

Ireland plays a key role in Fortum Group as the internal long-term financing centre ensuring efficient arm's length financing and protecting the Fortum Oyj balance sheet from financial risks. Fortum's Irish financing company has foreign branches in Belgium and the Netherlands, and the Irish legal companies are taxed in Ireland on their worldwide profits, meaning the foreign branch profits are taxed both in Ireland and the country where the branch is located, impacting the effective tax rate in Ireland. The main profit driver is the net interest income, which fluctuates due to market interest rates. The values are material and therefore we have experienced professionals in Ireland managing the portfolio. In December 2025, the loan portfolio reduced, the profit impacts of which will be visible future years. As Fortum's investments have been low, internal financing volumes have remained stable. As operational investments increase, financing needs will rise accordingly. Interest income of EUR 7 million (2024: 106 , 2023: 311) was included in equity as required by IFRS® Accounting Standard related to capital loans. When this is taken into account, the profit level has been stable for 2025 and 2024.

As previously mentioned, there is a significant deferred tax asset in Ireland as a result of write-down on loans related to the Uniper divestment in 2022 and the deconsolidation of Russian operations in 2023. At year-end 2025, Ireland had deferred tax assets of EUR 731 million. EUR 49 million in deferred tax assets were utilised against the positive Group internal financing results during 2025. Due to the deferred tax asset on tax losses, corporate income tax borne amounted to close to zero in 2023-2025.

The effective tax rate was 14.6% in 2025 (2024: 15.5%, 2023: 318.8%). In 2024 and 2025, the effective tax rate is mainly impacted by profits and losses from branches.

The Netherlands

The Netherlands also plays a role in the Group's holding and financing activities. The primary purpose of Dutch entities is to protect Fortum Oyj by segregating investment risks through intermediate holdings, reducing Fortum Oyj's direct exposure to potential investment write-downs. The main profit driver is returns on equity investments and net interest income. The investments are critical and therefore we have experienced professionals in the Netherlands managing the participations. The Dutch taxable profits are largely generated by FFI DAC Dutch branch, which provides Group internal financing. In addition to taxable financing profits, the Dutch results also include capital gains or losses and dividend income from shareholdings.

The profit before tax in 2025 was EUR 16 million (2024: 265, 2023: 160). The profit in 2025 was mainly impacted by the impairment of the Indian solar business and the final effects of earlier divestments. The holding company's results and losses included both non-deductible write-downs in subsidiaries and tax exempt dividend income. The profit before tax in 2024 was mainly driven by tax exempt gains from the sale of Recycling and Waste business by the holding company, and the taxable results of the Dutch financing entity.

The effective tax rate of 63.5% (2024: 8.0%, 2023: -22.2%) was increased by non-deductible write-downs of shares and assets in India. The 2024 effective tax rate was impacted mainly by the tax exempt gains described above. In 2023, the Netherlands recognised tax as income mainly due to the recognition of bad debt provision on Russian loans, resulting in a negative effective tax rate.

Total tax contribution was EUR 14 million (2024: 7, 2023: 2), consisting of corporate income tax in 2025. In 2024, there were taxes on property, which included an asset transfer tax paid in Finland related to internal restructuring of Recycling and Waste companies.

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Total Tax Contribution; information by country

Countries of operations

European Union

	Finland			Sweden			Poland			Ireland			The Netherlands		
EUR million	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**
Profit before tax	333	528	934	215	309	652	90	85	-66	333	233	-51	16	265	160
Stated capital [1]	7,043	9,403	11,799	5,290	4,036	3,802	472	414	308	18,696	18,679	18,630	3,484	7,363	7,366
Accumulated earnings [1]	8,212	9,123	9,595	1,308	1,131	1,754	138	141	73	-12,172	-11,982	-14,714	-2,335	-3,038	-3,009
Number of employees	2,278	2,189	2,682	968	931	1,038	881	779	717	5	5	5	5	7	9
Assets used in operations [2]	4,265	4,060	4,439	4,085	3,874	4,107	1,032	960	956	3	4	7	24	16	17
Interest bearing loan receivables [2, 3]	2,465	3,846	5,470	583	472	664	3	2	5	5,400	6,537	4,975	2,642	2,520	2,703
Effective income tax rate	18.3%	19.8%	19.2%	19.8%	21.3%	19.2%	18.1%	23.1%	16.6%	14.6%	15.5%	318.8%	63.5%	8.0%	-22.2%
Total tax contribution	271	362	290	231	202	318	286	264	51	1	1	0	14	7	2
Total tax rate	27.4%	26.2%	17.4%	45.2%	35.8%	22.5%	35.4%	23.0%	N/A	0.1%	0.3%	N/A	88.1%	2.6%	0.6%
Taxes borne															
Corporate income tax	55	96	112	63	88	122	24	10	24	0	0	0	14	2	0
Production taxes	8	17	23	0	2	1	1	1	0	0	0	0	0	0	0
Employment taxes	3	3	3	16	17	15	4	3	2	0	0	0	0	0	0
Taxes on property	37	36	34	47	16	15	8	8	7	0	0	0	0	5	0
Cost of indirect taxes	2	2	1	0	1	0	0	0	0	0	0	0	0	0	1
Total taxes borne	105	153	173	126	123	153	37	22	34	0	1	0	14	7	1
Taxes collected															
Net VAT	13	73	2	85	57	146	230	226	0	0	0	0	0	0	1
Sales VAT	584	724	692	318	333	516	643	666	611	0	0	1	4	1	1
VAT on Purchases	571	651	689	233	277	369	413	440	649	0	0	0	5	1	0
Payroll taxes	53	57	54	20	22	18	11	7	5	0	0	0	0	0	0
Excise taxes	0	0	0	0	0	0	9	8	7	0	0	0	0	0	0
Withholding taxes	100	78	61	0	0	0	0	0	4	0	0	0	0	0	0
Total taxes collected	166	208	117	105	79	164	250	242	17	0	0	0	0	0	1

1) In line with EU PCbCR requirements, we have chosen to disclose the stated capital and accumulated earnings per country. While the overall table reflects the consolidated Group position for each country, these specific lines differ because they represent the sum of the individual legal entities. This approach provides a more accurate view of each country’s equity position. The stated capital and accumulated earnings of Permanent Establishments and Branches are included in the jurisdiction where the legal entity is located.

2) Group internal eliminations between the countries are not included. This better reflects the position of the country’s assets and receivables.

3) Including cash collaterals.

	Finland	Sweden	Poland	Ireland	The Netherlands
Business activities	Businesses with service, production operations, holding activities, sales, and trading operations with a wider customer base	Businesses of production operations, holding activities, service and sales operations with a wider customer base	Businesses of production operations, trading operations, holding activities, services and sales with a wider customer base	Business with financing and service operations with a limited customer base	Businesses of holding, financing and services
Name of parent company/companies	Fortum Oyj	Fortum Power AB	Fortum Power and Heat Polska Sp. z o.o.	Fortum Finance Ireland DAC	Fortum Energy Holding BV
Names of main companies with operations	Fortum Power and Heat Oy, Fortum Markets Oy	Fortum Sverige AB, Fortum Markets AB	Fortum Power and Heat Polska Sp. z o.o., Fortum Marketing and Sales Polska	Fortum Finance Ireland DAC	Fortum Finance Ireland DAC, Dutch Branch
Comments by country	Narrative provided above	Narrative provided above	Narrative provided above	Narrative provided above	Narrative provide above

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	Denmark			Belgium			Germany			Spain			Other EU Countries		
EUR million	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**
Profit before tax	0	3	7	0	19	2	-2	-2	-2	-3	-1	-2	-1	0	0
Stated capital [1]	9	9	30	0	2	902	9	9	6	7	6	1	3	3	0
Accumulated earnings [1]	-9	-9	69	0	148	133	1	3	4	-14	-11	-4	-1	2	1
Number of employees	0	0	175	6	5	4	18	19	29	38	28	19	3	55	57
Assets used in operations [2]	0	0	101	1	0	0	8	8	6	13	10	9	0	1	1
Interest bearing loan receivables [2, 3]	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Effective income tax rate	22.0%	24.9%	21.7%	462.4%	20.8%	73.4%	0.0%	-8.8%	-21.6%	0.0%	0.0%	0.0%	71.3%	9,445.5%	-1948333.3%
Total tax contribution	0	10	11	1	4	2	0	2	1	1	4	1	0	1	1
Total tax rate	22.0%	74.2%	48.1%	260.7%	21.4%	75.0%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Taxes borne															
Corporate income tax	0	1	2	0	4	1	0	0	0	0	0	0	0	0	0
Production taxes	0	3	3	0	0	0	0	0	0	0	0	0	0	0	0
Employment taxes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Taxes on property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cost of indirect taxes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total taxes borne	0	4	5	1	4	2	0	1	0	0	0	0	0	0	0
Taxes collected															
Net VAT	0	1	1	0	0	0	0	1	0	0	1	0	0	0	0
Sales VAT	0	11	12	0	0	0	0	1	0	4	15	9	0	0	0
VAT on Purchases	0	10	11	0	0	0	1	0	1	4	14	11	0	0	0
Payroll taxes	0	5	5	0	0	0	0	0	1	0	0	0	0	0	1
Excise taxes	0	0	0	0	0	0	0	0	0	1	3	0	0	0	0
Withholding taxes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total taxes collected	0	6	6	0	0	0	0	1	1	1	4	0	0	0	1

1) In line with EU PCbCR requirements, we have chosen to disclose the stated capital and accumulated earnings per country. While the overall table reflects the consolidated Group position for each country, these specific lines differ because they represent the sum of the individual legal entities. This approach provides a more accurate view of each country's equity position. The stated capital and accumulated earnings of Permanent Establishments and Branches are included in the jurisdiction where the legal entity is located.
2) Group internal eliminations between the countries are not included. This better reflects the position of the country's assets and receivables.
3) Including cash collaterals.

	Denmark	Belgium	Germany	Spain	Other EU Countries
Business activities	No operations after the divestment of the recycling and waste business at the end of 2024.	Businesses with service operations	Businesses with service operations	Businesses with sales operations	
Name of parent company/companies	Fortum Energy Holding B.V	Fortum Finance Ireland DAC	Fortum Energy Holding B.V	Fortum Energy Holding B.V	
Names of main companies with operations	Barry Danmark ApS	Fortum Finance Ireland DAC, Belgium Branch	Fortum Batterie Recycling GmbH	Escandinava de Electricidad S.L.U.	
Comments by country	The high total tax rate was driven by the low profits. The total tax contribution has remained stable despite the fluctuation in profits. On 29 November 2024, Fortum completed the divestment of its recycling and waste business, which had operations e.g. in Denmark. As Fortum Waste Solutions A/S was the main company in Denmark, divestment has shrunk the operations to close to zero.	In 2024, FFIDAC Belgian branch continued as a service company, discontinuing its financing activities. Excess cash of EUR 900 million was returned to the Irish head office, resulting in the decrease in stated capital. In Q4 2024, tax litigation resulted in a positive ruling, leading to taxable interest income. In 2025, the company continued as a service company providing Public and Government affairs and financing support services.	In early 2023, Fortum's holding operations were ceased and merged into Ireland, which resulted in a material reduction in the indicators above. The remaining operations consist of service operations, which generate low profits and therefore low taxes borne and collected.	Fortum's business in Spain focuses on renewable-based electricity retailing and customer services, part of Fortum's Consumer Solutions segment.	Mainly refers to Estonia and France. Estonia provided services, however this activity ceased during 2025. France has a minor operation. In 2024 and 2023, the effective tax rate is increased due to a Group level tax adjustment on internal capital loan interest that cannot be allocated to a specific country. The rate would be 0% without this adjustment. See note 12.3 of the Financial Statements for more details.

Countries of operations

Non-European Union

	Norway			United Kingdom			USA			India			Other Non EU		
EUR million	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**
Profit before tax	-23	-23	-30	0	-10	-13	-3	-3	-4	-16	-11	-5	-5	9	1
Stated capital [1]	142	218	254	70	57	35	132	146	121	0	21	16	1	1	1
Accumulated earnings [1]	211	158	176	-52	-51	-35	-26	-27	-22	0	-19	-10	33	38	30
Number of employees	296	316	350	53	83	75	0	0	0	0	42	57	0	7	8
Assets used in operations [2]	449	465	598	2	2	5	104	113	95	0	13	8	6	7	8
Interest bearing loan receivables [2, 3]	5	5	6	35	23	10	0	0	0	0	0	0	42	35	29
Effective income tax rate	24.4%	23.1%	23.7%	3.9%	-1.4%	-2.7%	0.0%	0.0%	0.0%	0.0%	0.0%	-0.2%	-0.3%	-0.2%	13.3%
Total tax contribution	22	29	73	4	7	3	0	0	0	0	2	2	0	0	2
Total tax rate	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.0%	0.0%	N/A	N/A	N/A	N/A	1.3%	35.1%
Taxes borne															
Corporate income tax	3	4	2	0	0	0	0	0	0	0	0	0	0	0	0
Production taxes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Employment taxes	3	4	4	1	1	1	0	0	0	0	0	0	0	0	0
Taxes on property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cost of indirect taxes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total taxes borne	6	8	6	1	1	1	0	0	0	0	0	0	0	0	1
Taxes collected															
Net VAT	9	15	59	2	2	0	0	0	0	0	0	1	0	0	0
Sales VAT	227	218	495	2	4	-1	0	0	0	0	1	1	0	0	0
VAT on Purchases	218	203	436	0	1	2	0	0	0	0	0	0	0	0	0
Payroll taxes	7	6	7	2	3	2	0	0	0	0	1	1	0	0	1
Excise taxes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Withholding taxes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total taxes collected	16	21	66	4	6	2	0	0	0	0	1	2	0	0	1

1) In line with EU PCbCR requirements, we have chosen to disclose the stated capital and accumulated earnings per country. While the overall table reflects the consolidated Group position for each country, these specific lines differ because they represent the sum of the individual legal entities. This approach provides a more accurate view of each country's equity position. The stated capital and accumulated earnings of Permanent Establishments and Branches are included in the jurisdiction where the legal entity is located.

2) Group internal eliminations between the countries are not included. This better reflects the position of the country's assets and receivables.

Business activities	Businesses with service, sales, and trading operations with a wider customer base.	Businesses with production operations, holding activities, services, and sales	Business with equity investments	Businesses with solar production operations, services and sales	
Name of parent company/companies	Fortum Energy Holding BV	IVO Energy Ltd	Fortum Energy Holding BV	Fortum Energy Holding BV Fortum SAR BV	
Names of main companies with operations	Fortum Hedging AS, Fortum Strøm AS	Fortum O&M UK Ltd	Valo Ventures I LP Fund	SolarXL Zeta Energy Private Limited	
Comments by country	Narrative provided above.	While Fortum O&M operations continued to be profitable, other companies, which carried on holding and other activities were loss-making.	Fortum has established a limited partnership in the USA to invest in external start-ups on a broader geographical scale. The operations have been loss-making, resulting in no taxes being borne or collected.	In line with its Nordic strategy, Fortum is limiting its exposure in India. Operations primarily involved the construction of solar power parks. This business was capital-intensive and incurred losses in the initial years. Consequently, the taxes borne are low, which impacts the total tax contribution and tax rate. The low effective tax rate is also influenced by unrecognized deferred tax assets on losses. In 2025, Fortum sold Fortum India Private Ltd. along with solar assets developed in the region.	Mainly refers to Guernsey, Switzerland and Indonesia. Guernsey operates a re-insurance business for the Fortum Group. Switzerland has been closed during 2025 and Indonesia was also sold during 2025. Russia continues to be deconsolidated for all the above years.

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Other payments to the public sector

In addition to taxes borne and taxes collected, we make other compulsory tax-like payments to the public sector, payments that are not compensation for goods or services received. For example, in 2025 we paid EUR 40 (2024: 46) million in employer statutory pension contributions.

We are also a significant dividend payer. Fortum's Board of Directors proposes to the Annual General Meeting that a dividend of EUR 664 million be paid for the financial year 2025. (2024: 1,256). The Finnish State's share of this would be about EUR 340 million (2024: 644).

Information about companies registered in so-called low-tax jurisdictions

For the purposes of our tax principles, we define so-called low-tax jurisdictions to be countries with no or very low statutory taxation, no or low exchange of information, and tax assessments that are not based on tax law, but rather on non-transparent agreements in line with EU definitions. See also the EU list of non cooperative jurisdictions. This steers our behaviour when incorporating companies and businesses.

Fortum has two entities in countries that are considered low-tax jurisdictions. Both of these companies have been incorporated for business reasons, e.g. insurance regulation-related reasons, and not to take advantage of tax benefits.

- Fortum has a fully owned captive insurance company for internal re-insurance purposes in Guernsey, which was chosen for its optimal insurance industry and regulations. This business is subject to normal taxation in Finland under CFC legislation. The company incurred a loss of EUR 5 million in 2025 (2024: profit EUR 9 million), with EUR 1 million deferred tax asset recorded in Finland (2024: EUR 1.7 million tax paid in Finland).
- Fortum also has a minor stake in Nature Elements Asia Renewable Energy and Cleantech Fund L.P., which does research and development investments and is located in the Cayman Islands. These activities are not profitable and therefore do not generate a tax liability under CFC legislation.

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Public country-by-country reporting

We have published the country-by-country-report since 2022. Starting from 2023, the report can be found combined with our Tax Footprint report, as we believe it increases transparency and understanding of our tax positions. In years 2022-2024, we reported in accordance with OECD country-by-country report (OECD CbCR) requirements and in 2025, we reported under EU Public country-by-country report (EU PCbCR) framework.

The information disclosed in the EU PCbCR differs from the total tax tables on pages 28–30 due to different reporting requirement applied in the approaches. The accompanying illustrates the main differences between the Tax Footprint or Financial Statements and EU PCbCR numbers. All tables are reported on the IFRS® Accounting Standards basis for accounting. However the total tax tables aim to show the consolidated position, while EU public country-by-country reports the aggregated position which is the sum of the legal entities, stand-alone, within a country before any consolidation adjustments.

Fortum's legal entities report locally as per local GAAP or IFRS® Accounting Standards, so therefore the data we display will not align with the legal company financial statements. The difference will be accounting related adjustments as per IFRS® Accounting Standards and true-ups.

Consolidation adjustments are those that eliminate internal transactions between Group companies. As many of Fortum's companies trade with each other across the entire Group, within the same jurisdiction and across borders, the financial information in the EU PCbCR is different than what is presented in the Consolidated Financial Statements and the Tax Footprint.

Also, the definitions dictated by the OECD guidelines differ from the standard definitions we use in other reporting areas. For example, revenue includes interest income and capital gains in the EU PCbC report; in the Financial Statements, they are reported separately outside of sales.

Reconciliation of EU PCbCR to Financial Statements or Tax Footprint

EUR million

Total revenue / Sales		**Profit (Loss) before income tax**		**Income tax accrued - current year / Corporate income tax (in taxes borne)**		**Tangible assets other than cash and cash equivalents/Assets used in operations**	
Total revenue in EU PCbCR	8,279	Profit (Loss) before taxes in EU PCbCR	869	Income taxes accrued in EU PCbCR	157	Tangible assets other than cash and cash equivalents in EU PCbCR	6,403
Related party revenue	-1,993	Internal dividend income excluded from EU PCbCR	334	Adjustment of current tax related to prior years	1	Group consolidation incl PPA adjustments to tangible assets other than cash and cash equivalents	681
External revenue, not classified as sales in Income Statement	555	Group consolidation adjustments	-267	Other adjustments	1	Fortum's share in the State Nuclear Waste Management Fund	1,153
Netting of Nord Pool transactions 1)	-1,136					Trade and other receivables	987
Other consolidation adjustments	-716					Other assets used in operations	768
Sales in Consolidated Financial Statements	**4,989**	**Profit (Loss) before income tax in Consolidated Financial Statements**	**936**	**Corporate income tax (in taxes borne) in Tax Footprint**	**159**	**Assets used in operations in Tax Footprint**	**9,992**

1) Sales and purchases with Nord Pool Spot are netted on Group level on a 15 minutes or an hourly basis depending on the market area and posted either as revenue or cost depending on if Fortum is a net seller or net buyer during any particular 15 minutes or hour.

About EU PCbCR

From financial year 2025, in line with Directive (EU) 2021/2101 and its national implementation in Chapter 7b of the Finnish Accounting Act (3.5.2024/238), Fortum is required to annually publish the EU public country-by-country report (EU PCbCR).

The report is published on the company's website and submitted to the Finnish Patent and Registration Office for registration within 12 months from the end of the financial year. The content follows Section III, Parts B and C of Annex III to Council Directive 2011/16/EU.

The data illustrates local financial details on a stand-alone basis as per IFRS® Accounting Standards and the nature of main business activities in each country. The report includes all our operating countries without a materiality threshold. It is important to note that our total tax contribution reporting, based on consolidated information, does employ a normal materiality threshold. The EU PCbCR can be useful for identifying the cash taxes paid in each jurisdiction, for example.

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2025 EU Public Country-by-Country Reporting

Name of the MNE Group: Fortum Oyj

Fiscal Year concerned: 1.1.–31.12.2025

Currency used: EUR million

Tax Jurisdiction	Unrelated Party Revenue	Related Party Revenue	Total Revenue	Profit (Loss) before Income Tax	Income Tax Paid (on Cash Basis)	Income Tax Accrued — Current Year	Stated Capital 1)	Accumulated Earnings 1)	Number of Employees	Tangible Assets other than Cash and Cash Equivalents
Belgium	0	2	2	0	-1	0	0	0	6	0
Denmark	0	0	0	0	0	0	9	-9	0	0
Estonia	0	1	1	-1	0	0	0	1	1	0
Finland	2,110	550	2,660	323	80	55	7,043	8,212	2,278	2,535
France	0	0	0	0	0	0	2	-2	2	0
Germany	2	3	4	-2	0	0	9	1	18	7
Guernsey	7	1	8	-5	0	0	1	33	0	0
India	1	0	1	-13	0	0	0	0	0	0
Indonesia	0	0	0	0	0	0	0	0	0	0
Ireland	1	445	445	321	0	0	18,696	-12,172	5	0
Netherlands	-28	336	307	-67	4	14	3,484	-2,335	5	0
Norway	848	181	1,029	43	3	3	142	211	296	3
Poland	1,502	168	1,670	94	-8	24	472	138	881	642
Spain	71	0	71	-3	0	0	7	-14	38	0
Sweden	1,760	304	2,064	185	69	61	5,290	1,308	968	3,213
Switzerland	0	1	1	0	0	0	0	0	0	0
United Kingdom	13	1	14	-4	0	0	70	-52	53	0
United States	0	0	0	-3	0	0	132	-26	0	0
Total	**6,286**	**1,993**	**8,279**	**869**	**147**	**157**	**35,359**	**-4,706**	**4,551**	**6,403**

1) Stated Capital and Accumulated Earnings of Permanent Establishments and Branches have been included in the jurisdiction where the legal entity is located.

Tax Jurisdiction	Entity Name	Segment	Research and Development	Holding or Managing Intellectual Property	Purchasing or Procurement	Manu-facturing or Production	Sales, Marketing or Distribution	Adminis-trative, Management or Support Services	Provision of Services to Unrelated Parties	Internal Group Finance	Regulated Financial Services	Insurance	Holding Shares or Other Equity Instruments	Dormant
Belgium	Fortum Finance Ireland DAC Belgian Branch	G						●						
Denmark	Barry Danmark ApS	O					●							
Estonia	Fortum CFS Eesti Oü	O						●						
Finland	Akroton Oy	G												●
Finland	Ala-Korpivaara Wind Farm Oy	G				●								
Finland	Brändskogen Vindkraft Ab Oy	G												●
Finland	EX-KE Oy	CS					●							
Finland	Falisa Solkraft Ab/Oy	G				●								
Finland	Fortum Alku Oy	O						●						
Finland	Fortum Asiakaspalvelu Oy	CS					●	●	●					
Finland	Fortum Assets Oy	O											●	
Finland	Fortum Battery Recycling Oy	O				●								
Finland	Fortum Clean Oy	O												●
Finland	Fortum Heat and Gas Oy	G											●	
Finland	Fortum Kasvu Oy	G												●
Finland	Fortum Markets Oy	O					●							
Finland	Fortum Norm Oy	O											●	
Finland	Fortum Oyj	G	●	●	●			●		●			●	
Finland	Fortum Power and Heat Holding Oy	G											●	
Finland	Fortum Power and Heat Oy	G, O			●	●		●	●				●	
Finland	Fortum Real Estate Oy	O						●					●	
Finland	Fortum Renewables Oy	G			●			●						
Finland	Fortum RES Oy	O				●	●							
Finland	Fortum Tuuli ja Aurinko Oy	G				●							●	
Finland	Fortum Tuulivoima Oy	G												●
Finland	Fortum TwoGether Oy	G						●						
Finland	Harvankankaan Tuulivoima Oy	G												●
Finland	Honkamaan Tuulivoima Oy	G				●								
Finland	Iisalmen Vuorimäen Tuulivoima Oy	G				●								
Finland	Iso Saapasnevan Tuulivoima Oy	G												●
Finland	Jeppo Vindkraft Ab Oy	G				●								
Finland	Kalax Solkraft Ab/Oy	G				●								
Finland	Kannonkosken Vuorijärven Tuulivoima Oy	G				●								
Finland	Katajamäen Tuulivoima Oy	G				●								
Finland	Kemiönsaaren Aurinkovoima Oy	G				●								
Finland	Koillis-Pohjan Energiantuotanto Oy	G					●						●	
Finland	Kolsa-Juvansuon Tuulivoima Oy	G				●								
Finland	Korvenniityn Aurinkovoima Oy	G				●								
Finland	Kotapalon Tuulivoima Oy	G				●								

Tax Jurisdiction	Entity Name	Segment	Research and Development	Holding or Managing Intellectual Property	Purchasing or Procurement	Manu-facturing or Production	Sales, Marketing or Distribution	Adminis-trative, Management or Support Services	Provision of Services to Unrelated Parties	Internal Group Finance	Regulated Financial Services	Insurance	Holding Shares or Other Equity Instruments	Dormant
Finland	Kurikan Tuulivoima Oy	G				●								
Finland	Kurikka Energy Oy	G												●
Finland	Lakkasuo Wind Farm Oy	G				●								
Finland	Lamminnevan Tuulivoima Oy	G				●								
Finland	Lapinlahden Iso Petäjämäen Tuulivoima Oy	G				●								
Finland	Lautamäen Tuulivoima Oy	G				●								
Finland	Lehtivuoret Wind Farm Oy	G												●
Finland	Marttilan Aurinkovoima Oy	G				●								
Finland	Molpe Vindkraft Ab/Oy	G				●								
Finland	Murtomäen Kivikankaan Tuulivoima Oy	G				●								
Finland	Myyränkankaan Tuulivoima Oy	G				●								
Finland	Närpes Vindkraft Ab/Oy	G				●								
Finland	Niittunevan Tuulipuisto Oy	G												●
Finland	Norrsarvlax Solkraft Ab/Oy	G				●								
Finland	Orimattilan Kuivannon Tuulivoima Oy	G												●
Finland	Oy Pauken Ab	O						●						
Finland	Oy Tersil Ab	O											●	
Finland	Oy Tertrade Ab	O											●	
Finland	Penkkisuon Tuulivoima Oy	G				●								
Finland	Pennalan Aurinkovoima Oy	G				●								
Finland	Pjelax Vindkraft Ab/Oy	G				●								
Finland	Pohjoismäki Wind Farm Oy	G												●
Finland	Poikel Vindkraft Ab/Oy	G				●								
Finland	Purmo Vindpark Ab	G				●								
Finland	Reisjärven Kiiskinevan Tuulivoima Oy	G				●								
Finland	Sikokangas Wind Farm Oy	G				●								
Finland	Tarvasjoen Aurinkovoima Oy	G				●								
Finland	Virolahden Aurinkovoima Oy	G				●								
Finland	Yli-Iin Iso Rytisuon Tuulivoima Oy	G				●								
Finland	Yliken Aurinkovoima Oy	G				●								
France	Fortum France S.A.S	G						●						
Germany	Fortum Batterie Recycling GmbH	O				●	●							
Germany	Fortum Service Deutschland GmbH	G, O												●
Germany	MAWAL Energie GmbH	O												●
Germany	SALWAL Energie GmbH	O												●
Guernsey	Fortum Insurance Ltd	G										●		
India	Fortum India Private Ltd	G					●	●	●					
India	Solar One Energy Private Limited	G												●
India	SolarXL Alpha Energy Private Limited	G												●
India	SolarXL Beta Energy Private Limited	G				●	●							

Tax Jurisdiction	Entity Name	Segment	Research and Development	Holding or Managing Intellectual Property	Purchasing or Procurement	Manu-facturing or Production	Sales, Marketing or Distribution	Adminis-trative, Management or Support Services	Provision of Services to Unrelated Parties	Internal Group Finance	Regulated Financial Services	Insurance	Holding Shares or Other Equity Instruments	Dormant
India	SolarXL Delta Energy Private Limited	G												●
India	SolarXL Gamma Energy Private Limited	G												●
India	SolarXL Zeta Energy Private Limited	G												●
Indonesia	PT Fortum Energy Solution	G							●					
Ireland	Fortum eNext Ireland Ltd	G							●					
Ireland	Fortum Finance Ireland Designated Activity	G								●				
Ireland	Fortum P&H Ireland Limited	O											●	
Ireland	Fortum Participation Ltd	O						●						
Netherlands	Fortum 2 B.V.	G												●
Netherlands	Fortum 3 B.V.	O											●	
Netherlands	Fortum Energy Holding B.V.	O						●		●			●	
Netherlands	Fortum Finance Ireland DAC Dutch Branch	G						●		●				
Netherlands	Fortum H&C B.V.	G											●	
Netherlands	Fortum Holding B.V.	G						●					●	
Netherlands	Fortum Power Holding B.V.	O	●										●	
Netherlands	Fortum Russia B.V.	O											●	
Netherlands	Fortum SAR B.V.	G						●		●			●	
Netherlands	Fortum Star B.V.	G											●	
Netherlands	India Sun B.V.	G												●
Netherlands	PolarSolar B.V.	G						●						
Netherlands	YUSTEK Holding BV	O											●	
Norway	Fortum Consumer Solutions AS	CS, G						●					●	
Norway	Fortum Hedging AS	G			●		●	●	●					
Norway	Fortum Strøm AS	CS			●		●							
Norway	Tellier Service AS	CS						●						
Poland	Fortum Energia S.A.	CS					●	●	●				●	
Poland	Fortum Energia S.p. z o.o.	CS					●		●					
Poland	Fortum Network Częstochowa Sp. z o.o.	G				●								
Poland	Fortum Network Plock Sp.z.o.o.	G				●								
Poland	Fortum Network Wroclaw Sp. z o.o.	G				●								
Poland	Fortum Power and Heat Polska Sp. z o.o.	G				●	●	●	●				●	
Poland	Fortum Service Poland Sp. z o.o.	O			●			●						
Poland	Fortum Silesia S.A.	G				●			●					
Poland	Fortum Sprzedaz Sp. z o.o_1	CS					●	●						
Spain	Escandinava de Electricidad S.L.U.	CS			●		●							
Sweden	Alvret Solpark AB	G												●
Sweden	Bankälla Solpark AB	G												●
Sweden	Bergsveden Solpark AB	G												●
Sweden	Blybergs Kraftaktiebolag	G				●								
Sweden	Borgvik Vindkraft AB	G												●

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Tax Jurisdiction	Entity Name	Segment	Research and Development	Holding or Managing Intellectual Property	Purchasing or Procurement	Manu-facturing or Production	Sales, Marketing or Distribution	Adminis-trative, Management or Support Services	Provision of Services to Unrelated Parties	Internal Group Finance	Regulated Financial Services	Insurance	Holding Shares or Other Equity Instruments	Dormant
Sweden	Brännälven Kraft AB	G				●								
Sweden	Fortum 1 AB	O											●	
Sweden	Fortum Fastigheter AB	CS						●					●	
Sweden	Fortum Förnyelsebar Sverige 2 AB	G												●
Sweden	Fortum Förnyelsebar Sverige 3 AB	G												●
Sweden	Fortum Förnyelsebar Sverige 4 AB	G												●
Sweden	Fortum Förnyelsebar Sverige 5 AB	G												●
Sweden	Fortum Förnyelsebar Sverige 6 AB	G												●
Sweden	Fortum Förnyelsebar Sverige 8 AB	G												●
Sweden	Fortum Förnyelsebar Sverige 9 AB	G												●
Sweden	Fortum Förnyelsebar Sverige AB	G												●
Sweden	Fortum Grön AB	G												●
Sweden	Fortum Markets AB	G					●							
Sweden	Fortum Power AB	O											●	
Sweden	Fortum Produktionsnät AB	G												●
Sweden	Fortum Sverige AB	G, O				●		●	●					
Sweden	Fortum Sweden AB	O											●	
Sweden	Fortum Vindkraft Sverige 3 AB	G												●
Sweden	Fortum Vindkraft Sverige 4 AB	G												●
Sweden	Fortum Vindkraft Sverige 8 AB	G												●
Sweden	Klinthögen Vindkraft AB	G												●
Sweden	Klöverkullen Vindkraft AB	G												●
Sweden	Mellansvensk Kraftgrupp Aktiebolag	G											●	
Sweden	Nya Bullerforsen Kraft AB	G				●								
Sweden	Oreälvens Kraftaktiebolag	G				●								
Sweden	Sävar Vindkraft AB	G				●								
Sweden	Tuna Vindkraft AB	G												●
Sweden	Uddeholm Kraft Aktiebolag	G												●
Sweden	Värmlandskraft-OKG-delägarna Aktiebolag	G											●	
Switzerland	Fortum Holding B.V. / Swiss Branch office	G						●						
United Kingdom	Fortum Energy Limited	O						●						
United Kingdom	Fortum O&M (U.K.) Limited	O							●					
United Kingdom	Fortum Power & Heat / UK PE	G				●								
United Kingdom	Fortum Ratcliffe Limited	O				●								
United Kingdom	IVO Energy Limited	O											●	
United States	Valo Ventures I LP Fund	O											●	

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Key terms and definitions

Term	Definition
Assets used in operations	Non-interest-bearing assets plus interest-bearing assets related to the Nuclear Waste Fund (non-interest-bearing assets do not include finance-related items, taxes, and assets from fair valuations of derivatives used for hedging future cash flows).
ATAD (Anti-Tax Avoidance Directive)	An EU framework of rules designed to prevent tax avoidance practices by companies, including measures on interest limitation, exit taxation, hybrid mismatches, and controlled foreign companies.
BEPS (Base Erosion and Profit Shifting)	BEPS refers to cross-border tax arrangements by multinational enterprises that artificially shift profits to low- or no-tax jurisdictions, eroding the tax base of other countries. The OECD's BEPS framework establishes legally supported measures to counter such abusive practices.
Comparable effective income tax rate	Comparable income tax expense divided by Comparable profit before income tax, excluding share of profit/loss from associated companies and joint ventures.
Comparable income tax expense	Income tax expense, excluding taxes on items affecting comparability, adjustments to finance costs – net, tax rate changes and other one-time adjustments.
Comparable profit before income tax	Comparable operating profit, +/- comparable share of profit/loss of associates and joint ventures, +/- comparable finance costs net.
Corporate income tax (CIT)	Tax expense accrued in that period and adjustments to prior periods that may be paid in the same period or the period immediately after as required by law. CIT is presented as part of taxes borne in the Tax Footprint.
Current tax expense	The amount of income tax payable or recoverable for a given period, calculated based on taxable profits in accordance with applicable tax laws.
Current tax effective rate	Current tax expense for current year, divided by profit before income tax.
Effective income tax rate	Income tax expense, divided by profit before income tax.
Financing	Operational activity ensuring efficient financial strength and capacity for each legal entity to invest by segregating financing risks including the structuring and management of financial resources— through arm's length debt arrangements—to support business operations, investments, and sustainable growth.
IFRS® Accounting Standards	The term refers to IFRS® Accounting standards as issued by the International Accounting Standards Board (IASB) as well as interpretations of these standards as issued by IASB's Standards Interpretation Committee (SIC) and IFRS Interpretations Committee (IFRIC)
Income tax expense	All taxes that are based on the taxable profits of an accounting period (current tax) and temporary differences between accounting values and tax bases (deferred tax) of a company, as defined in the International Financial Reporting Standard IAS12.
Indirect tax	Tax that is required to be paid to a government by one person or company at the expense of another person or company, such as Value Added Tax (VAT) levied on the consumption of goods and services.
More likely than not principle	When determining the tax treatment of a transaction, we adopt a position only if it is more than 50% likely to be upheld based on the letter and purpose of the law, as interpreted by the applicable court.
Other payments to and from the public sector	Other compulsory tax-like payments to the public sector, payments that are not compensation for goods or services received.
Profit before income tax	Accounting profit for a period before deduction of corporate income taxes.
Tax	Any amount of money required to be paid to a government without receiving any services, whether by law or by agreement, including, without limitation, corporate income taxes, production taxes, property taxes, employment taxes, sales taxes, asset transfer tax, and any other required payments.
Tax haven	A jurisdiction with low or zero taxes and secrecy that is often used to facilitate aggressive tax abuse, hide assets, and obscure the origin or ownership of funds. Our full definition is available in our Tax Principles.
Taxes borne	Taxes that a company is obliged to pay to a government, directly or indirectly, on that company's own behalf with respect to an accounting period. Taxes borne includes corporate income taxes (excluding deferred taxes), production taxes, employment taxes, taxes on property, and cost of indirect taxes. Production taxes include also taxes paid through electricity purchased from associated companies.
Taxes collected	Taxes that a company is obliged to pay to a government on behalf of another person or a company. Taxes collected includes VAT, excise taxes on power consumed by customers, payroll taxes, and withholding taxes.
The Group / Fortum Group	Fortum Oyj and its subsidiaries and Fortum Group associated companies and joint ventures.
Total tax contribution	Sum of taxes borne and taxes collected. Total tax contribution is a measure of the contribution it has made to the public finances in the year.
Total tax rate	Taxes borne, divided by profit before tax, increased by taxes borne in operating profit. Taxes included in operating profit are production taxes, employment taxes, taxes on property and cost of indirect taxes.
Transfer pricing	The pricing methods of goods, services, and financial transactions between related enterprises, set according to the arm's length principle as if the transactions were between independent parties.
Uncertain tax position	An uncertain tax position arises when the tax treatment of a transaction or item is unclear under applicable law, creating uncertainty about whether the position will be sustained by tax authorities.
ViDA (VAT in the Digital Age)	An EU initiative to modernise VAT, introducing electronic invoicing, real-time reporting, and a single registration system to improve efficiency and reduce fraud.
Weighted average applicable income tax rate	Sum of the proportionately weighted share of profits before taxes of each Group operating country, multiplied by the applicable nominal tax rate of the respective countries.
Windfall tax	A tax levied on an unforeseen or unexpectedly large profit, especially one regarded to be excessive or unfairly obtained.

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