



# Transparency Report

**KPMG Oy Ab**  
1.10.2020 – 30.9.2021

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[KPMG.fi](https://www.kpmg.fi)



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# Message from the Chief Executive Officer

**KPMG Oy Ab's Transparency Report for the financial year ending 30 September 2021 has been prepared in accordance with the EU Audit Regulation N:o 537/2014. Transparency Report is a key part of our communication and it provides readers, our clients and interest groups with useful information about our organization and our quality control system. We describe the structure and governance of KPMG Finland and explain the KPMG values and ethical standards and principles which direct our operations. KPMG's values are Integrity, Excellence, Courage, Together and For better. These values reflect what we consider important, they are included in our working methods and they guide our internal and external operations.**

**Q**uality, integrity and independence are the foundation of our operations. They remain the basis of our corporate culture and guide our business choices ►

in the changing operational and regulatory environment of our industry. Our management has the overall responsibility for quality, and at the engagement level, quality work is every KPMG employee's matter.

During the past financial year, the demand for our services has continued to grow. In the midst of uncertainty and constant change, an expert advisor, reliable financial information, and the assurance provided by audits are even more important. The digitalization of society, which affects us all, further emphasises the importance of data verification.

Our personnel are at the heart of our strategy and we will continue to invest in the satisfaction and well-being of our current and future personnel at KPMG. We invest heavily in the continuous and diverse development of our personnel's skills, career paths and good management.

We have invested in our development projects related to digitalization and new ways of working. Even in a pandemic situation and a flexible hybrid work environment, we have consistently been able to serve our customers as usual and to perform our engagements well. Changes in the operating environment require us to continuously evaluate and develop our operating methods. We measure both our customer satisfaction and the satisfaction of our personnel in relation to the set goals.

We are determined to further KPMG network's "Global Audit Quality Transformation" development project on our part, which will comprehensively renew our processes and working methods as well as the quality control system. We have especially invested in audit tool development, data analytics and processes that support and ensure the quality of work, as well as the training of our personnel.

We want to promote transparency and public trust in us and our industry as a whole with open dialogue with our interest groups. In addition, we are pleased to contribute to the wider debate regarding the audit industry, as well as take part in the development projects and practical interpretation of the regulation affecting the industry. Through our own actions and open dialogue, we want to promote the continuous development of audit quality and also emphasise the relevance of the auditor profession in the society. We consider it very important that the profession of auditor continues to be interesting to both those already working in the field and students.

Helsinki, 31.1.2022

**Kimmo Antonen**

Chief Executive Officer  
KPMG Oy Ab

**Quality, integrity and independence are the foundation of our operations. They remain the basis of our corporate culture and guide our business choices in the changing operational and regulatory environment of our industry.**

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Throughout this document, "KPMG", "we", "our" and "us" refers to the global organisation or to one or more of the member firms of KPMG International Limited, each of which is a separate legal entity. KPMG International Limited is a private English company limited by guarantee and does not provide services to clients.

No member firm has any authority to obligate or bind KPMG International Limited or any other member firm vis-à-vis third parties, nor does KPMG International Limited have any such authority to obligate or bind any member firm.

Throughout this document, references to "Firm", "KPMG firm", "member firm" and "KPMG member firm" refer to firms which are either: members of KPMG International Limited; sublicensee firms of KPMG International Limited; or entities that are wholly or dominantly owned and controlled by an entity that is a member or a sublicensee. The overall governance structure of KPMG International Limited is provided in the 'Governance and leadership' section of the 2021 KPMG International Transparency Report.

# Our culture and Values

## **Tone at the top – Leadership responsibilities for quality**

KPMG global leadership, working with regional and member firm leadership, plays a critical role in establishing our commitment to quality and the highest standards of professional excellence. A culture based on accountability, quality, objectivity, independence, integrity, and ethics is essential in an organization that carries out audits and other services on which stakeholders rely. We promote a culture in which consultation is encouraged and recognised as a strength. We communicate this commitment to our customers, stakeholders, and society as a whole.

Our values represent what we believe in and what is important to us as an organization. Values guide our day-to-day operations by telling us how we act and make decisions as well as how we work together with our employees, customers and stakeholders.



# Our Values are:



## Integrity

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We do what is right.



## Excellence

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We never stop learning and improving.



## Courage

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We think and act boldly.



## Together

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We respect each other and draw strength from our differences.



## For Better

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We do what matters.

Outlined in KPMG’s Global Code of Conduct (“the Code”) are the responsibilities all KPMG personnel have to each other, our clients, and the public. It shows how our Values guide all of our behaviors and actions. Everyone at KPMG is held accountable to comply with the Code of Conduct and to confirm their compliance with the Code. Everyone at KPMG is also required to take regular training covering the Code.

Our personnel are encouraged to raise their concerns when they see behaviors or actions that are inconsistent with our Values or professional responsibilities and required to do so when they see breaches of KPMG policies, laws and regulations, and professional standards.

We have procedures and established channels of communication so that our personnel can report ethical and quality issues and individuals who report in good faith will not suffer any adverse impact regardless of whether the concern is ultimately substantiated.

[The KPMG International hotline](#) is a mechanism for KPMG partners, employees, clients and other external parties to confidentially report concerns they have relating to certain areas of activity by KPMG International itself, KPMG member firms or the senior leadership or employees of a KPMG member firm.

The Global People Survey provides KPMG Finland leadership and KPMG International leadership with results

related to upholding the KPMG Values. KPMG Finland and KPMG International monitor the results and take appropriate actions to communicate and respond to any findings (refer to section “Insights from our people – Conduct and follow-up on the Global People Survey (GPS)”.

## System of quality control

Tone at the top, leadership, and a clear set of Values and conduct are essential to set the framework for quality. However, these are required to be backed up by a system of quality control<sup>1</sup> that ensures our performance meets the highest professional standards.

KPMG continues to invest significantly in audit quality across the global organization. This means ongoing investment in the system of quality management, global monitoring of audit quality, enhanced support, and providing best-in class technology and tools for engagement teams.

A robust and consistent system of quality control is essential to delivering quality services. KPMG International has quality control policies that apply to all KPMG firms. These are included in KPMG’s Global Quality & Risk Management Manual (GQ&RM Manual), which applies to all KPMG personnel.

To adopt the new international standard on quality management (ISQM 1) ►



<sup>1</sup> System of quality management is the term used in the new ISQM 1 standard, whereas the term used in the current ISQC 1 standard is System of quality control.



which was approved by the IAASB and will be effective from December 2022, KPMG International initiated a program to redesign the network-wide requirements for member firms' systems of quality management. ISQM 1 requires each KPMG firm to design, implement and operate a system of quality management to consistently deliver quality audits, and to evaluate the effectiveness of the system on an annual basis.

As we prepare for ISQM 1, we have adopted a new Global Quality Framework to better outline how we deliver quality at KPMG, and how everyone at KPMG is accountable to its delivery. 'Perform quality engagements' sits at the core along with our commitment to continually monitor and remediate our processes as necessary.

While getting ready for ISQM 1, we also meet the requirements of the current International Standard on Quality Control (ISQC 1), issued by the International Auditing and Assurance Standards Board (IAASB) and the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA).

While many KPMG's quality control processes are cross-functional and apply equally to i.a. tax & legal and advisory work, this description of the system of quality control focuses mainly on the delivery of quality audits.

## Leadership responsibilities for quality and risk management

Leadership plays a critical role in setting the right tone and leading by example. The following individuals have leadership responsibilities for quality and risk management at KPMG Finland.

### Chief Executive Officer

In accordance with the principles in ISQC 1, our CEO Kimmo Antonen has assumed ultimate responsibility for KPMG Finland's system of quality control.

### National Risk Management Partner

The National Risk Management Partner is responsible for setting overall professional risk management and quality control policies and monitoring compliance for the firm. The Risk Management Partner of KPMG Finland Tiina Tornainen reports directly to the CEO and consults with the appointed Area Quality and Risk Management Leader. The Risk Management Partner is the head of the Quality & Risk Management (QRM) team.

The Risk Management Partner of KPMG Finland is also acting as the Ethics and Independence Partner. The Ethics and Independence Partner has primary responsibility for the direction and execution of ethics and independence policies and procedures in KPMG Finland. ►

## The Audit and Assurance, Tax & Legal and Advisory functions – Function Heads

The three heads of the client service functions are accountable to the CEO for the quality of service delivered in their respective functions. Between them, they determine the operation of the risk management, quality assurance and monitoring procedures for their specific functions within the framework set by the National Risk Management Partner and the QRM team. These procedures make it clear that at the engagement level, risk management and quality control is ultimately the responsibility of all professionals.

KPMG Finland's Head of Audit & Assurance Toni Aaltonen is responsible for management and control of the Audit function. This includes:

- setting a strong tone and culture supporting audit quality through communication, engagement support and commitment to the professional standards, including skepticism, objectivity, and independence
- developing and implementing strategies to monitor and maintain knowledge and skills required of partners and employees to fulfil their professional responsibilities
- working with the Risk Management Partner and the QRM team to monitor and address audit quality and risk matters as they relate to the Audit practice, including an annual evaluation of activities considered to be key to audit quality.

The Audit & Assurance executive committee consisted of the following persons during the financial year 1 October 2020–30 September 2021:

- Head of Audit & Assurance Toni Aaltonen, Partner, Authorised Public Accountant, KHT
- Kirsi Jantunen, Partner, Authorised Public Accountant, KHT, responsible for learning and development and for other human resources matters
- Kim Järvi, Partner, Authorised Public Accountant, KHT, responsible for the development of audit tools and processes
- Hans Bertell, Partner, Authorised Public Accountant, KHT, responsible for the regions
- Lotta Nurminen, Partner, Authorised Public Accountant, KHT, Audit Quality Leader, responsible for the development of audit quality and audit quality performance review process
- Karoliina Tiainen, Director, Authorised Public Accountant, KHT, Head of Department of Professional Practice, responsible for advising and guidance of auditors related to financial statements, auditing and auditor reporting
- Anna Sailas, People, Performance & Culture liaison
- Robert Wakkinen, Finance liaison
- Veera Kanerva, Communications

The Audit & Assurance executive committee of KPMG Finland met regularly, approximately once a month, during the financial year. The meetings included regular discussions about personnel and well-being at work, the financial

development of the audit function, pricing of services, audit quality development and audit quality issues arising from external and internal quality review processes.

In addition, an important discussion topic has been digitalisation, data analytics and the related development of audit tools as well as Corporate Social Responsibility and the development of related assurance services.

The Audit Quality Committee has considered matters relating to maintaining and improving audit quality. During the financial year, the Audit Quality Committee comprised of the Head of Audit & Assurance Toni Aaltonen, the Audit Quality Leader Lotta Nurminen, the Risk Management Partner Tiina Torniainen and the Head of Department of Professional Practice Karoliina Tiainen.



# Organization and management

## Our business and strategy

KPMG Oy Ab is a professional services firm that provides Audit & Assurance, Tax & Legal and Advisory services. We operate out of 21 offices across Finland and had 1488 personnel on 30 September 2021 (30.9.2020: 1277). KPMG Oy Ab was established in 1926 and it has been granted the status of an audit firm in accordance with the criteria of Chapter 6, section 5 of the Finnish Auditing Act.

KPMG Oy Ab is the parent company in a group which on September 30, 2021 included subsidiaries KPMG Global Strategy Group Finland Oy Ab, KPMG IT Sertifiointi Oy, KPMG Julkistarkastus Oy and Trusteq Oy, certain non-operational companies and an Estonian affiliate KPMG Nordic Services Oü. Since 2017, also KPMG Estonia has been incorporated to the group. A list and further details of the group entities are set out in the [firm's financial statements](#). Our audit services in Finland are delivered through KPMG Oy Ab and KPMG Julkistarkastus Oy. Only KPMG Oy Ab provides statutory audit services to public interest entities. Full details of the services offered

by KPMG Oy Ab and its group companies can be found on our website [www.kpmg.fi](http://www.kpmg.fi).

Our strategy is set by KPMG Oy Ab's management and Board of Directors. Also all partners and personnel participated in the drafting of the strategy. Our strategy emphasizes KPMG network's common commitment to KPMG International's global strategy. We invest in our personnel's well-being, their career paths and growing their expertise, we organize our operations in accordance with our clients' interests and needs and increase technology's role as part of all our client solutions.

## Legal structure and ownership

KPMG Oy Ab is a limited liability company established under Finnish law. It is wholly owned by its partners working in the firm. According to the Finnish Auditing Act the majority of votes yielded by the firm's shares must be held by auditors working in the firm, audit firms or auditors or audit firms approved in an EEA state. On 30 September 2021 such auditors and audit firms held 53,8 per cent of the total number of votes. ►





KPMG Oy Ab is part of a global network of professional services firms providing Audit, Tax, and Advisory services to a wide variety of public and private sector organizations. The KPMG network employs 236 000 experts in 145 countries.

The KPMG network's structure is designed to support consistency of service quality and adherence to agreed values wherever the member firms operate.

### **Legal structure from 1 October 2020**

On 1 October 2020, KPMG Oy Ab and all other KPMG firms entered into new membership and associated documents, the key impact of which is that all KPMG member firms in the KPMG global organisation became members in, or have other legal connections to, KPMG International Limited, an English private company limited by guarantee ("KPMG International"). From 1 October 2020, KPMG International Limited has acted as the coordinating entity for the overall benefit of the KPMG member firms. It does not provide professional services to clients. Professional services to clients are exclusively provided by member firms.

KPMG is the registered trademark of KPMG International and is the name by which the member firms are commonly known. The rights of member firms to use the KPMG name and marks are contained within agreements with KPMG International.

KPMG International Limited and the KPMG member firms are not a global partnership, single firm, multinational

corporation, joint venture, or in a principal or agent relationship or partnership with each other. No member firm has any authority to obligate or bind KPMG International Limited, any of its related entities or any other member firm vis-à-vis third parties, nor does KPMG International Limited or any of its related entities have any such authority to obligate or bind any member firm.

Member firms are generally locally owned and managed. Each member firm is responsible for its own obligations and liabilities. KPMG International and other member firms are not responsible for a member firm's obligations or liabilities. Member firms may consist of more than one separate legal entity. If this is the case, each separate legal entity will be responsible only for its own obligations and liabilities, unless it has expressly agreed otherwise.

Further detail on the revised legal and governance arrangements for the KPMG global organization from 1 October 2020 can be found in section 'Governance and leadership' of the [2021 KPMG International Transparency Report](#).

The name of each audit firm located in the EU/EEA that is a member of the network and the EU/EEA countries in which each network member firm is qualified as a statutory auditor or has its registered office, central administration or principal place of business are listed in Appendix 3 and also available on [KPMG International's website](#).

*Total turnover achieved by EU/EEA audit firms resulting from the statutory audit of annual and consolidated financial statements<sup>2</sup>*

Aggregated revenues generated by KPMG audit firms, from EU and EEA Member States resulting from the statutory audit of annual and consolidated financial statements was EUR 2,05 billion during the year ending 30 September 2021. The EU/EEA aggregated statutory audit revenue figures are presented to the best extent currently calculable and translated at the average exchange rate prevailing in the 12 months ended 30 September 2021.

### **Responsibilities and obligations of member firms**

Under agreements with KPMG International, member firms are required to comply with KPMG International's policies and regulations including quality standards governing how they operate and how they provide services to clients to compete effectively. This includes having a firm structure that ensures continuity and stability and being able to adopt global strategies, share resources (incoming and outgoing), service multi-national clients, manage risk, and deploy global methodologies and tools.

Each member firm takes responsibility for its management and the quality of its work. All member firms commit to a common set of KPMG values.

### **KPMG International governance bodies**

The key governance and management bodies of KPMG International are the Global Council, the Global Board, and the Global Management Team. Further details on KPMG International's governance structure can be found in the [2021 KPMG International Transparency Report](#).

### **Governance structure**

KPMG Oy Ab's governance systems aim at an efficient and clear way of operating in which the responsibilities and authorities of its various organs are distinctly defined. The firm's operating principles are defined in business and governance models including the KPMG values and the Code of Conduct. The objectives of the company's governance principles are transparency and responsible activity. Shareholders' meeting, the Board of Directors and its committees, the Chief Executive Officer and the executive committee and partner meetings are in charge of the corporate governance systems.

In its operations the firm complies with the provisions of the Finnish Companies Act, Auditing Act and other applicable legislation as well as the firm's articles of association. The firm's activities are also guided by directions and recommendations for the business issued by different ►

<sup>2</sup> The financial information set forth represents combined information of the separate KPMG member firms from EU and EEA Member States that perform professional services for clients. The information is combined here solely for presentation purposes. KPMG International performs no services for clients nor, concomitantly, generates any client revenue.

authorities, regulators and the EU, as well as the self-regulation of the audit field.

### Shareholders' meeting

The shareholders' meeting is the firm's highest decision-making organ convening at least once a year. Additional shareholders' meetings are convened in accordance with the provisions of the Finnish Companies Act.

The provisions of the Companies Act and the articles of association are followed when making decisions in the shareholders' meeting. The responsibilities of the shareholders' meeting include election of Board of Directors members and auditors, the discharge of the Board of Directors members and the Chief Executive Officer from liability, adoption of the financial statements and deciding on the use of profit.

### Appointments Committee

Appointments Committee's task is to prepare a proposal for the shareholders' meeting regarding the Board of Directors. The shareholders elect the members of the Appointments Committee so that it represents all groups of shareholders. The chairman of the Board of Directors acts as expert member in the committee. Members of the Appointments Committee are elected for one year at a time unless otherwise decided. At the end of the year 2020 the appointments committee was composed of Henrik Holmbom, Christian Liljeström, Jussi Järvinen, Juha-Pekka Mylén and Esa Kailiala (Chairman of the Board of Directors, expert member).

### The Board of Directors

Under the articles of association, the shareholders' meeting annually elects a Board of Directors containing 4–8 members. More than half of the members and its chairman and deputy chairman must be authorised public accountants working for the firm.

The Board of Directors must comply with the Companies Act and other acts regulating the operations of the firm and the group, the articles of association and the approved principles of the firm's corporate governance.

The members of the Board of Directors are paid a compensation set by the shareholders' meeting.

The Board of Directors is responsible for outlining the firm's and group's strategy and monitoring its implementation. The Board accepts the operating plans for the different client service functions on the basis of the strategy and is responsible for defining the monitoring principles of operations. The Board appoints the Chief Executive Officer and approves the appointments of the Chief Executive Officer's direct subordinates. The Board also bears the responsibility for the appropriate organisation of operations and for defining and monitoring the risk management principles.

The members of the Board of Directors were:

- During 30 September 2020 – 15 December 2020  
Ari Eskelinen (Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Kirsi Jantunen (Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Esa Kailiala (Chairman of the Board, Partner, M.Sc. (Econ),

Authorised Public Accountant, KHT), Mika Laaksonen (Head of Technology Advisory, Partner, M.Sc. (Tech.)), Anders Lundin (Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Mikko Palmu (Partner, LL.M.) and Timo Torkkel (Partner, D.Sc. (Econ)).

- During 16 December 2020 – 30 September 2021  
Kirsi Jantunen (Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Esa Kailiala (Chairman of the Board, Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Antti Kääriäinen (Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Mika Laaksonen (Head of Technology Advisory, Partner, M.Sc. (Tech.)), Sanna Laaksonen (Head of International Tax, Partner, LL.M.), Anders Lundin (Vice Chairman of the Board, Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Mikko Palmu (Partner, LL.M.).

Juha Purovesi, Chief Financial and Operating Officer has acted as secretary of the Board of Directors. The Board convened 14 times under the financial year.

In addition, the Compliance Committee has operated under the Board.

The Board of Directors regularly evaluates its effectiveness, policies and performance.

### Compliance Committee

The Compliance Committee is an independent disciplinary organ appointed by the Board of Directors whose responsibility is to support the compliance ►



with KPMG International's instructions as well as the firm's internal instructions. It also takes disciplinary actions defined in the Committee's standing order in situations where these instructions have been violated.

Members of the Compliance Committee were Kirsi Adamsson, Anders Lundin (chairman), Kim Järvi, Mikko Palmu and Tiina Torniainen. General Counsel Juha Karttunen acted as the secretary of the Compliance Committee.

### **Chief Executive Officer**

The Chief Executive Officer, elected by the firm's Board of Directors, is in charge of the group's business operations. The executive committee assists the Chief Executive Officer who is the chairman of the group.

The Chief Executive Officer is responsible for the implementation of the firm's approved strategy and acts as performance manager for the members of the executive committee and the Risk Management Partner. The Chief Executive Officer is in charge of group's risk management based on policies determined by the Board of Directors. The Chief Executive Officer is also in charge of KPMG's international relationships.

Since December 15, 2016, the firm's Chief Executive Officer has been Authorised Public Accountant, KHT Kimmo Antonen.

### **Executive Committee**

The executive committee assists the Chief Executive Officer in the group's operative management and in imple-

menting the strategy confirmed by the Board of Directors as well as in developing the business operations, defining the group level operating instructions and managing internal communication.

During the financial year ending on 30 September 2021, the executive committee consisted of Toni Aaltonen (Head of Audit & Assurance, Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Kimmo Antonen (Chief Executive Officer, Partner, M.Sc. (Econ), Authorised Public Accountant, KHT), Tomas Granvik (Head of Clients & Markets, Partner, M.A. Corporate Law), Antti Lojamo (Head of Innovation & Technology, Partner, M.Sc. (Econ)), Hanna Niemi (People, Performance & Culture Lead, M.Sc. (Econ)), Kalle Nurminen (Head of Advisory, Partner, M.Sc. (Econ)), Juha Purovesi (Chief Operating Officer, Partner, M.Sc. (Econ)), Juha Säskilahti (Head of Tax & Legal, Partner, M.Sc. (Econ)).

The executive committee convenes on average twice a month or more frequently if needed.

### **Quality & Risk Management (QRM)**

Quality & Risk Management (QRM) department monitors our professional risks and supports the management in developing the quality of our operations. Risk Management Partner Tiina Torniainen is in charge of the team. QRM duties include the following functions: Risk Management & Compliance, Ethics & Independence, Technology Risk Management & Information Protection, Office of General Counsel, Auditing & Accounting DPP and Audit & Assurance Capital Markets Desk. ►

Altogether 25 specialists worked with these QRM tasks during the financial year, most of them on a full-time basis.

QRM cooperates with the global network of international KPMG member firms as well as with the relevant regulatory bodies and also monitors regulation applicable to the firm and amendments thereto.

### **Partners and partner meetings**

All KPMG Oy Ab partners are employed by the firm. The partners must commit to complying with KPMG's rules of independence and investments, its risk management policies and other regulations covering its operations. Partners must manage all their assignments diligently. They must follow the ethics and high professional standards generally adopted within their profession. At the end of the financial year on 30 September 2021 the firm had a total of 86 partners, 55 of which were equity partners with shareholdings yielding voting rights in the company.

Partner meetings are held regularly to deal with any common matters of partners that are of importance to the firm's operations and to all of its partners. Meetings concerning shareholder matters or compensation of partners are attended by the parent firm's shareholders only.

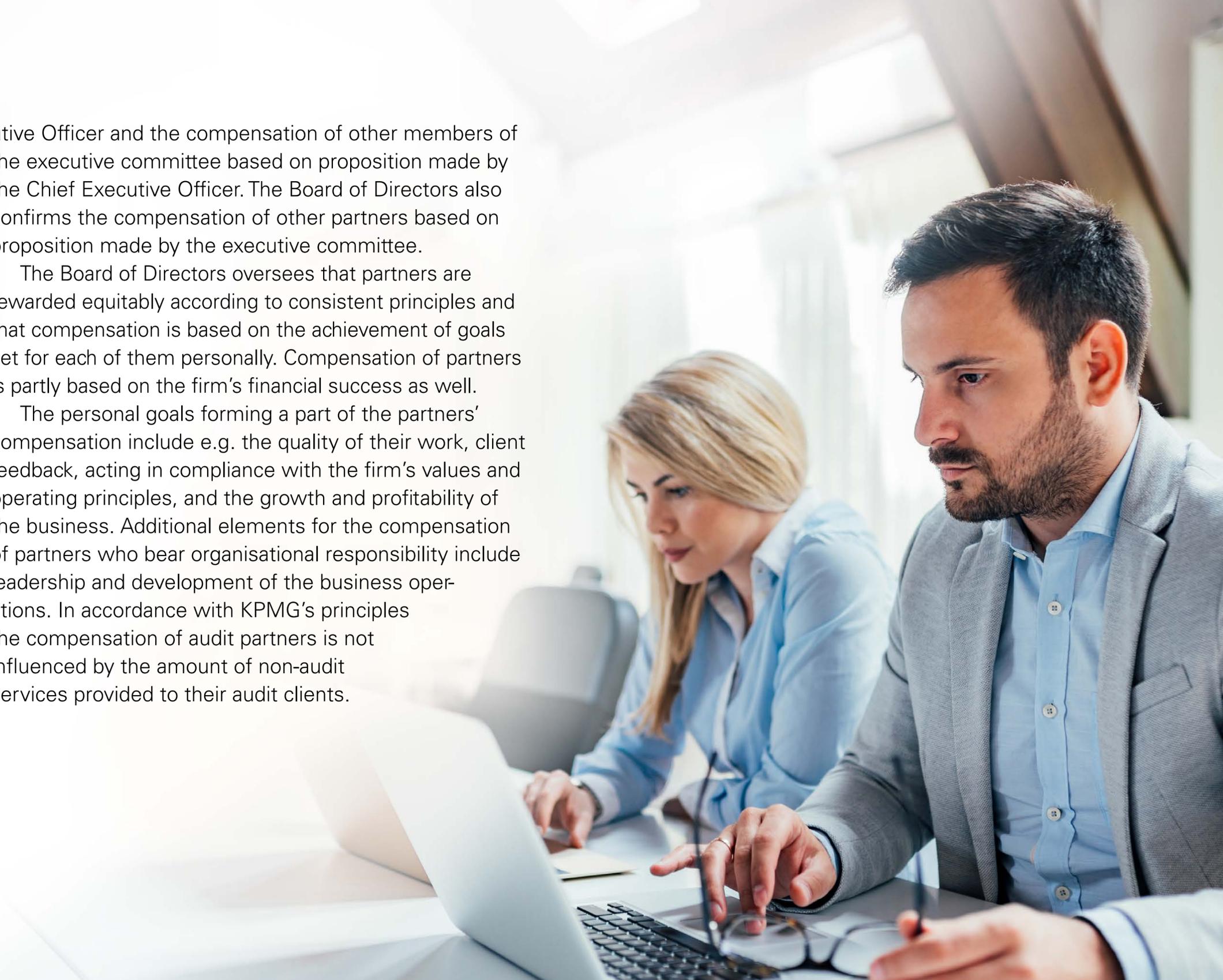
### **Compensation of partners**

According to the principles of responsibility and organisation of partner compensation decision making, the Board of Directors decides the compensation of the Chief Exec-

utive Officer and the compensation of other members of the executive committee based on proposition made by the Chief Executive Officer. The Board of Directors also confirms the compensation of other partners based on proposition made by the executive committee.

The Board of Directors oversees that partners are rewarded equitably according to consistent principles and that compensation is based on the achievement of goals set for each of them personally. Compensation of partners is partly based on the firm's financial success as well.

The personal goals forming a part of the partners' compensation include e.g. the quality of their work, client feedback, acting in compliance with the firm's values and operating principles, and the growth and profitability of the business. Additional elements for the compensation of partners who bear organisational responsibility include leadership and development of the business operations. In accordance with KPMG's principles the compensation of audit partners is not influenced by the amount of non-audit services provided to their audit clients.



# Board of Directors



**Esa Kailiala**

Chairman of the Board, Partner, M.Sc.  
(Econ), Authorised Public Accountant, KHT



**Kirsi Jantunen**

Partner, M.Sc. (Econ), Authorised  
Public Accountant, KHT



**Antti Kääriäinen**

Partner, M.Sc. (Econ),  
Authorised Public Accountant, KHT



**Mika Laaksonen**

Head of Technology Advisory,  
Partner, M.Sc. (Tech.)



**Sanna Laaksonen**

Head of International Tax,  
Partner, LL.M.



**Anders Lundin**

Vice Chairman of the Board, Partner, M.Sc.  
(Econ), Authorised Public Accountant, KHT



**Mikko Palmu**

Partner, LL.M.

# Executive Committee



**Kimmo Antonen**

Chief Executive Officer, Partner, M.Sc. (Econ), Authorised Public Accountant, KHT



**Toni Aaltonen**

Head of Audit & Assurance, Partner, M.Sc. (Econ), Authorised Public Accountant, KHT



**Tomas Granvik**

Head of Clients & Markets, Partner, M.A. Corporate Law



**Antti Lojamo**

Head of Innovation & Technology, Partner, M.Sc. (Econ)



**Hanna Niemi**

People, Performance & Culture Lead, M.Sc. (Econ)



**Kalle Nurminen**

Head of Advisory, Partner, M.Sc. (Econ)



**Juha Purovesi**

Chief Operating Officer, Partner, M.Sc. (Econ)



**Juha Säaskilahti**

Head of Tax & Legal, Partner, M.Sc. (Econ)

# Applying expertise and knowledge

We are committed to continue to build on our technical expertise and knowledge recognizing its fundamental role in delivering quality audits.

## Methodology aligned with professional standards, laws and regulations

### Bringing consistency through our methodology

Our audit methodology, tools and guidance are:

- in principle globally consistent and based on International Standard on Auditing (ISA), and are supplemented to comply with local auditing standards and regulatory or statutory requirements
- inclusive of KPMG methodology interpretations that drive consistency in areas where the applicable standards are not prescriptive in the approach to be followed
- centered on identifying risks and the necessary audit responses
- made available to all KPMG audit professionals and required to be used, where necessary

- how we enable a consistent approach to planning, performing and documenting audit procedures
- focused on the international assurance methodology in response to growth of Environmental, Social and Governance (ESG reporting).

The KPMG audit methodology is set out in the KPMG Audit Manual and includes KPMG interpretation of how to apply ISAs. The methodology emphasizes applying appropriate professional skepticism in the execution of audit procedures and requires compliance with relevant ethical requirements, including independence.

Enhancements to the audit methodology, guidance and tools are made regularly to maintain compliance with standards and address emerging auditing areas of focus and audit quality results (internal and external). For example, the COVID-19 pandemic has had an impact to many of our clients and our personnel has worked from home for the most part. We have issued guidance to our auditors on conducting audit procedures in a remote-working environment, raising awareness of key audit risks such as going concern and impairments and of the importance ►

of exercising professional skepticism in this financial situation.

KPMG firms may also draft local requirements or guidance in order to comply with local professional, legal, or regulatory requirements.

## Deep technical expertise and knowledge

### Access to specialist networks

KPMG Finland engagement teams have access to a network of KPMG specialists – either within their firm or in other KPMG firms. These specialists receive the training they need to ensure they have the competencies, capabilities and objectivity to appropriately fulfil their role on our audits.

The need for specialists to be assigned to an audit engagement in areas such as information technology, tax and legal, treasury, actuarial and valuations is considered as part of the audit engagement acceptance and continuance process, as well as during the planning and conduct of the engagement.

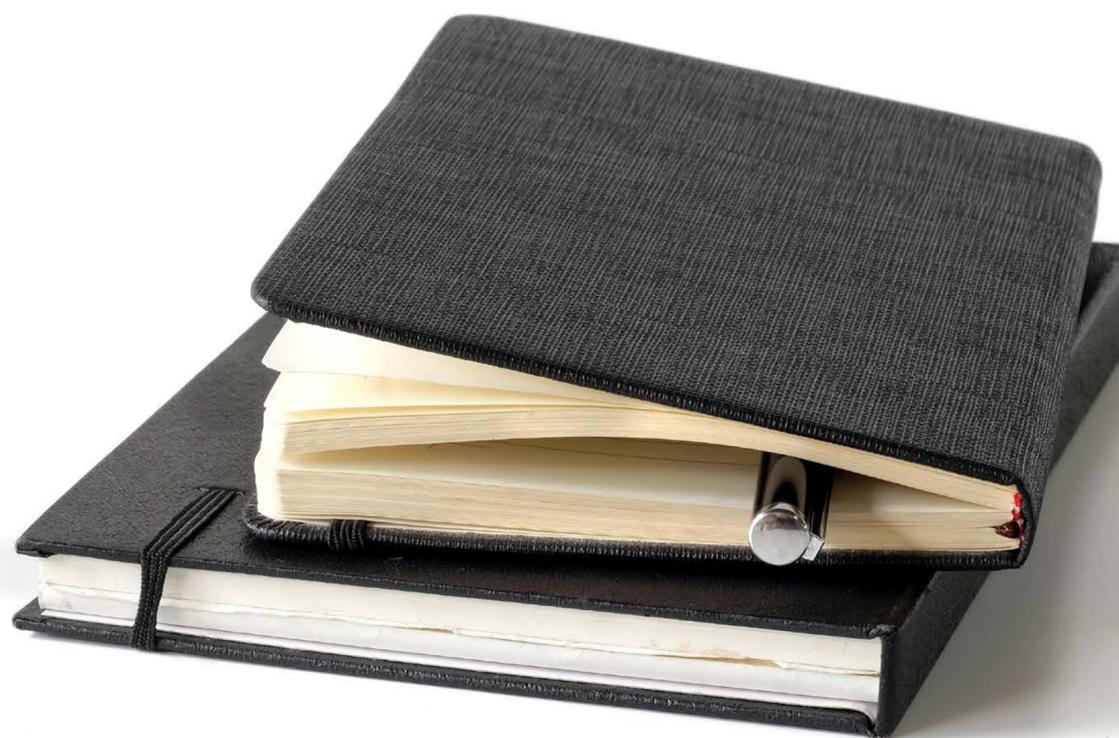
### KPMG's commitment to audit quality during the COVID-19 pandemic

The COVID-19 pandemic has forced us all to think differently, we continue to respond to and embrace this challenge. Most organizations are likely to have been impacted by the COVID-19 pandemic, either directly or indirectly, and the

increased economic uncertainty and risk may have significant financial reporting implications. Issues including going concern, asset impairments and valuations will require careful judgment as organizations deal with a high degree of uncertainty and market volatility. KPMG firms' role as auditors is to evaluate these judgements.

KPMG International and KPMG Finland have issued extensive guidance to assist teams in addressing the various accounting, financial reporting and audit related matters arising from the impacts of the COVID-19 pandemic. KPMG's guidance has been continually updated throughout the pandemic.

KPMG is a technology-enabled organization, with audit technical accounting and auditing resources, guidance and audit platforms and tools available electronically, enabling the conversion to a remote working environment. Enhanced communication has been increasingly important to everyone during the COVID-19 pandemic. We have leveraged our investments in technology to provide KPMG firms with regular communications, including virtual meetings to share best practices and guidance. In addition, we have enhanced our listening strategy to include specific COVID-19 pulse surveys to allow us to hear from our people in real time and shape our response accordingly.



# Embracing digital technology

At KPMG, we are committed to serving the public interest and create value through continuous innovation. By leveraging leading technologies, we are transforming the audit experience for our professionals and our clients – enabling us to provide an even higher quality audit by increasing our ability to focus on the issues that matter through the data and insights it provides.

## Audit tools

The global audit methodology is supported by eAudIT, KPMG International's electronic audit tool, which provides KPMG Finland's auditors with the methodology, guidance, and industry knowledge needed to perform high-quality audits. The key activities within the eAudIT workflow are engagement setup, risk assessment, testing and completion. ▶



KPMG Finland has separate tools for small audit engagements. We have developed with other Nordic KPMG firms a new tool for small audit engagements. Nordic Automated Standardised Audit Approach (NASAA) leverages client's transaction level general ledger and trial balance data to produce automated standardised audit procedures. The new tool has been taken in use more widely in small audit engagements from the beginning of October 2018.

Significant investments are underway to revise and enhance the KPMG audit methodology and audit tools. KPMG Clara workflow will replace eAudit and our other current audit tools as an audit tool in the next few years. KPMG Clara is piloted in audits of financial years 2019–2021.

Simultaneously, our audit methodology is being renewed and the KAM methodology will be replaced by the new KAEG methodology, the KPMG Audit Execution Guide. KAEG is built more directly based on ISA standards, with an emphasis on a risk-based approach to auditing. Renewed tools and a new methodology are an important part of an ongoing project at KPMG's global audit quality improvement.

### **Data & Analytics**

Technology and innovation have changed the way we execute our audit engagements, empowering our people to deliver greater quality and value. Utilising data and analytics as a core part of the KPMG audit is critical to

our mission of driving audit quality and improving the customer experience. In audit engagements we perform both standardised data analytics and tailored data analytics. All audit teams can utilise our data analysts in performing the data analytics. We also develop audit documentation tools as part of KPMG digitalisation development.

### **KPMG Move and eSign**

KPMG Move is a digital collaboration platform where engagement teams can communicate and share files with clients in a secure way.

KPMG eSign is our electronic signature service that uses strong authentication method. KPMG eSign can be used in audit engagements for example to sign engagement contracts, auditor's reports ja management representation letters.

### **Client confidentiality, information security, and data privacy**

The importance of maintaining client confidentiality is emphasized through a variety of mechanisms such as the Code of Conduct. All KPMG professionals are required to confirm their compliance with the Code and take regular training.

KPMG has policies on information security, confidentiality, personal information and data privacy. We have a document retention policy concerning the retention period for audit documentation and other records relevant to an engagement in accordance with the relevant

IESBA requirements as well as other applicable laws, regulations, and professional standards. We invest significantly in information security and data privacy. We maintain an information security system (ISMS) which is certified in accordance with ISO/IEC27001:2013 standard. The certification requires constant maintenance and development of information security and an annual auditing by an accredited independent entity. In addition, we provide supplementary training on information protection and data privacy requirements to all KPMG Finland personnel annually.



# Nurturing diverse skilled teams

## **Recruiting appropriately qualified and skilled people, with diversity of perspective and experience**

One of the key drivers of quality is ensuring that KPMG professionals have the appropriate skills and experience to deliver high quality audits. This requires the right recruitment, development, reward, promotion, retention, and assignment of professionals.

### **Recruitment**

We work extensively with universities and universities of applied sciences to promote awareness and knowledge of different work opportunities in the field of audit and assurance. Our recruiting strategies are focused on drawing entry-level talent. We also recruit experienced personnel with different backgrounds.

All employees are employed following a variety of selection processes, which may include competency-based interviews, psychometric and ability testing, case studies and qualification/reference checks. ►



## **Inclusion, Diversity & Equity program**

Inclusion, diversity and equity (IDE) is core to our very existence – helping us build great teams with diverse views that represent the world we live in. It leads to better decision making and drives greater creativity and innovation.

At KPMG, we are also committed to building an inclusive future for all. Trained, empathetic and equal opportunities personnel are among our local and global strategic goals. At KPMG Finland, we continue to promote equality, fairness, diversity and an inclusive culture.

We recognize the importance of a diversity strategy for our staff and customers. Below are our strategic priorities for the coming period:

### **1. Everyone at KPMG feels part of our community**

We want everyone at KPMG to feel involved in our community and we want to involve people more in discussions and decision-making. We also want to increase the diversity of our workforce, for example in terms of educational background and nationality.

### **2. Aiming for psychological safety and an empathetic work community**

We want to create a safe, empathetic atmosphere so that everyone can be themselves and, if necessary, raise potential concerns for discussion. According to our previous GPS results, most of our employees feel they can be themselves at work. We want to further strengthen this and bring it up on various occasions.

### **3. Equal opportunities at different career levels and business units**

We enable equal development of personnel at different stages of their careers, business units and roles.

We strive for a balanced representation of people in different groups of personnel, for example, regarding different genders, age groups and nationalities.

For more about Inclusion & Diversity at KPMG read [here](#).

## **Reward and Promotion**

### ***Evaluation process***

KPMG Finland's personnel, including partners, have annual goal setting and performance reviews. Each person is evaluated on their agreed-upon goals, demonstration of our global behaviors and values and technical capabilities. We have renewed our performance development approach to support the changing environment. The new performance development activities include regular conversations between team member and performance manager, setting and updating focused and stretching goals and seeking and giving feedback. To support their development performance managers and persons in project management roles have received feedback from the engagement teams through 180 and / or 360 queries.

KPMG Finland monitors quality and compliance incidents for the purposes of evaluation, promotion and remuneration. These evaluations are conducted by performance managers and partners who are in a position to assess performance of other partners and employees and propose a performance rating.

### ***Reward***

The aim of our compensation policy is to ensure that our compensation is fair and competitive. Our compensation policies are linked to the performance review process.

Our compensation system consists of monthly salary and fringe benefits, yearly performance bonuses, ►

personal bonuses for extraordinary performance, voluntary collective group pension insurance for most employees and other benefits such as benefits for physical exercise and cultural activities.

Most of the firm's employees are included in the performance bonus system. The amount of the performance bonus is based on consideration of member firm, each unit and individual performance. All personnel is included in the personal bonus system.

### ***Partner admissions***

Our process for admission to partnership is thorough. As part of partner admission process the person takes part in a coaching program during which the person has a chance to develop competencies needed in the partner role and to get support from colleagues, a mentor and the management of the company. In addition, during the process the person's skills and competence to act in the role of a partner is assessed. Shareholders and appropriate members of leadership are involved in the assessment process. Our criteria for admission to the partnership are consistent with our commitment to our values and being an employer of choice.

## **Assigning an appropriately qualified team**

KPMG Finland has procedures in place to assign both engagement partners and other professionals to a specific

engagement on the basis of their skill sets, relevant professional and industry experience, and the nature of the engagement.

Function heads are responsible for the assignment process with assistance of a team in charge of hourly budgets. Key considerations include partner experience and capacity to perform the engagement taking into account the size, complexity and risk profile of the engagement and the type of support to be provided (i.e. the engagement team composition and specialist involvement).

Audit engagement partners are required to be satisfied that their engagement teams have appropriate competencies and capabilities, including time, to perform audit engagements in accordance with our audit methodology, professional standards, and applicable legal and regulatory requirements. This may include involving specialists from our own firm, other KPMG member firms or external experts.

## **Investing in data centric skills – including data mining and analysis**

KPMG is strategically investing in our talent pipeline by partnering with world-class institutions to sustain our strong leadership, while also looking forward to cultivating the skills and capabilities that will be needed in the future. We are recruiting and training professionals who specialize in software, cloud capabilities and artificial ►



intelligence and who can bring industry best practices to our smart audit platform.

We provide our professionals with training on a wide range of technologies to ensure that our field professionals not only meet the highest professional standards but are also upskilled in new technology. With this approach we are bringing together the right people with the right skills and the right technology to perform exceptional audits.



## **Lifelong learning and the development of professional and leadership skills**

### **Commitment to technical excellence and quality service delivery**

All KPMG Finland professionals are provided with the technical training and support they need to perform their roles. This includes access to internal specialists and the QRM team, which is made up of senior professionals with extensive experience in audit, reporting and risk management. Where the right resource is not available within KPMG Finland, the firm accesses a network of highly skilled KPMG professionals in other KPMG firms. Specialists who are members of an audit team are provided with training on audit concepts.

### **Lifetime learning strategy**

Continuous growth and development as individuals and as an organisation are prerequisites to be able to perform quality work. We provide opportunities for professionals to develop their competencies. We develop training programs and learning solutions that support the development of individuals, teams and the organization. We offer multifaceted career opportunities based on personal strengths and motivation of persons. We encourage development in the individual's role, and we want to offer opportunities for growth in our work – continuous learning is part of everyday life.

KPMG's 70/20/10 framework lays the foundation for competence development. According to this model, 70 per cent of learning takes place at work, 20 per cent takes place in networks and through interaction, and 10 per cent takes place through training and coaching. Our learning paths include courses and coaching to develop technical, leadership, and business skills. Also strengthening and developing digital skills has become increasingly important in the learning paths. In addition to classroom courses, we give our personnel access to online learning environments and peer discussions in order to support learning from others. Some trainings are organised locally and others through our Nordic training and development organisation. We also give all personnel access to KPMG's global e-learning materials.

In addition to the personal development described above, our policies require all professionals to maintain their professional competencies. Auditors shall comply with the training requirements required by regulations.

KPMG Finland has policies concerning the continuing education of audit personnel. For audit personnel we annually determine obligatory professional trainings and monitor their completion.

KPMG Finland ensures that the professionals performing the audits have the necessary knowledge of the relevant legislation (including accounting legislation, IFRS and tax legislation), auditing and the client's industry.

# Associating with the right clients and engagements

KPMG's client and engagement acceptance and continuance policies and processes are designed to identify and evaluate any potential risks prior to accepting or continuing a client relationship or performing a specific engagement. KPMG firms are required to evaluate whether to accept or continue a client relationship or perform a specific engagement. Where client/engagement acceptance or continuance decisions pose significant risks, additional approvals are required.

## Prospective client and engagement evaluation process

### Client evaluation

KPMG Finland undertakes an evaluation of every prospective client. This involves an assessment of the prospective client's principals, its business and other service-related matters. This also involves identification of the prospective client, its key management and significant beneficial owners. In certain risk situations several persons are involved in approving the evaluation.

### Engagement evaluation

The prospective engagement partner evaluates each prospective engagement. The evaluation identifies potential risks in relation to the engagement. A range of factors are considered as part of this evaluation, including potential independence and conflict of interest issues (using Sentinel™, KPMG's conflicts and independence checking system), intended purpose and use of engagement deliverables, public perception, whether the services would be unethical or inconsistent with our Values, as well as factors specific to the type of engagement. For audit services, these include the competence of the client's financial management team and the skills and experience of partners and employees assigned to staff the engagement. In certain cases, the evaluation includes approval by the Risk Management Partner and / or another partner.

Depending on the overall risk assessment of the prospective client and engagement, additional safeguards may be introduced to help mitigate the identified risks. Any potential independence or conflict of interest issues are required to be documented and resolved prior to acceptance.

A prospective client or engagement will be declined if a potential independence or conflict issue cannot be resolved satisfactorily in accordance with professional standards and our policies, or if there are other quality and risk issues that cannot be appropriately mitigated.

An annual re-evaluation of all KPMG Finland audit clients and audit engagements is undertaken. In addition, clients are re-evaluated if there is an indication that there may be a change in their risk profile.

In certain circumstances, KPMG may decide to resign from being the auditor, in which case we will act as required by the Auditing Act and communicate the matter to the client's management or those charged with governance and, if necessary, to the Auditor oversight unit.

# Being independent and ethical

## Acting with integrity and living our Values

KPMG International has detailed independence policies and procedures, incorporating the requirements of the IESBA Code of Ethics. These are set out in KPMG's Global Quality and Risk Management Manual, which applies to all KPMG firms. Automated tools facilitate compliance with these requirements.

These policies are supplemented by other policies and processes to ensure compliance with regulatory requirements. These policies and processes cover areas such as firm independence, personal independence, firm financial relationships, employment relationships, firm rotation and rotation of auditors and approval of audit and non-audit services.

The Partner-in-Charge of the Global Independence Group is supported by a core team of specialists to help ensure that robust and consistent independence policies and procedures are in place at KPMG firms, and that tools are available to help the firms and their personnel to comply with these requirements. ►

KPMG Finland has a designated Ethics and Independence Partner (EIP) Tiina Torniainen who has primary responsibility for the direction and execution of ethics and independence policies and procedures. The EIP is responsible for communicating and implementing KPMG International policies and procedures and ensuring that local independence policies and procedures are established and effectively implemented when they are more stringent than the KPMG International requirements. The EIP fulfils this responsibility together with the QRM team through:

- Implementing and monitoring the ethics and independence processes;
- overseeing the processes related to the evaluation of specific independence threats in connection with clients and prospective clients;
- participating in the development of training materials;
- implementing procedures to address non-compliance; and
- overseeing the disciplinary process for ethics and independence matters.

Changes to KPMG's policy on independence are communicated to member firms and member firms must adopt the revised policy. KPMG Finland's partners and employees are required to consult with the EIP on certain matters as defined in the KPMG Global Quality and Risk Management

Manual. In certain situations, the EIP is required to consult with KPMG's Global Independence Group.

## **Maintaining an objective, independent and ethical mindset, in line with our code of conduct and policies**

### **Personal financial independence**

KPMG International policies require that each KPMG member firm and its professionals are free from prohibited financial interests in, and prohibited relationships with, KPMG's audit clients, their management and directors. The policies also extend the IESBA Code of Ethics restrictions on ownership of audit client securities to every KPMG member firm partner in respect of any audit client of any member firm.

KPMG Finland personnel are responsible for making appropriate inquiries and taking other appropriate actions on an ongoing basis to ensure that they do not have any personal financial, business or family interests that are restricted for independence purposes.

In common with other KPMG member firms, we use an independence compliance system (KICS) to assist our personnel in complying with personal independence

investment policies. This system contains an inventory of publicly available investments.

Partners and personnel who are assistant manager grade or above are instructed to ensure the permissibility of the investment by using the KICS system prior to entering into an investment. They are also required to maintain a record of all of their investments in KICS, which automatically notifies them if their investments subsequently become restricted and they must dispose of that investment. We monitor compliance with this requirement as part of our program of independence compliance audits of a sample of professionals.

### **Employment relationships**

Any professional providing services to an audit client irrespective of function is required to notify our EIP if they intend to enter into employment negotiations with that audit client.

In accordance with the Finnish Auditing Act there are time restrictions regarding key audit partners and other authorized auditors in the audit engagement team joining that client in certain roles until a defined period of time has passed.

Experts carrying out assurance engagements are also required to notify the EIP if they intend to enter into employment negotiations with that client during the course of the assurance engagement. ►

## The standard acceptance evaluation performed for every audit engagement includes an evaluation of independence.

### Firm financial interests and borrowings

KPMG member firms must not have prohibited investments in audit clients or prohibited relationships with audit clients, their management or, where applicable, their significant owners. KPMG Finland uses KICS to record all financial investments, borrowing, and finance leases. KPMG Finland annually confirms that it has complied with the independence requirements as part of the Risk Compliance Program.

### Business relationships/suppliers

KPMG Finland has policies and procedures in place that are designed to ensure its business relationships are maintained in accordance with the IESBA Code of Ethics and other applicable independence requirements.

### Business acquisitions and investments

If KPMG Finland is in the process of considering the acquisition of, or investment in, a business, it is required to perform sufficient due diligence procedures on the prospective target to identify and address any potential independence and risk management issues prior to closing the transaction. Specific consultation requirements are applied to enable independence and other issues to be addressed

when integrating the business into KPMG Finland and the KPMG network.

### Independence clearance process

In addition to the standard acceptance evaluation performed for every engagement, which includes an evaluation of independence, KPMG Finland follows specific procedures to identify and evaluate threats to independence related to prospective audit clients that are public interest entities; these procedures, also referred to as 'the independence clearance process, are required to be completed prior to accepting an audit engagement for these entities.

### Independence training and confirmations

KPMG Finland arranges annual independence training for all partners and other personnel, appropriate to their grade and function, using KPMG's international training material. New employees are required to complete this training when they start working at KPMG.

We also provide all partners and employees with training on the Code of Conduct, and bribery and compliance with laws, regulations, and professional standards. New partners and employees are required to complete these trainings.

Personnel employed by KPMG must confirm that they comply with applicable ethical and independence regulations and policies. All KPMG personnel must annually confirm that they have complied with applicable ethical and independence policies throughout the financial year.

### Non-audit services

KPMG Finland has policies, which are consistent with the Finnish Auditing Act, the EU Audit Regulation and the IESBA principles, which address the scope of services that can be provided to audit clients.

In addition to identifying potential conflicts of interest, Sentinel™, facilitates compliance with these policies. Certain information on all prospective engagements, including service descriptions and fees must be entered into Sentinel™ as part of the engagement acceptance process.

Using Sentinel™ lead audit engagement partners are required to: maintain group structures for their public interest entity audit clients as well as their affiliates, and identify and evaluate any independence threats that may arise from the provision of a proposed non-audit service and the safeguards available to address those threats. Sentinel™ enables lead audit engagement partners for those entities for which group structures are maintained, to review and approve, or deny, any proposed service for those entities worldwide.

We establish and maintain a process to review and approve all new and modified services that are ►

developed by the KPMG Finland or adopted from another member firm. The EIP is involved in the review of potential independence issues.

KPMG policies prohibit audit partners from being evaluated on, or compensated based on their success in selling non-audit services to their audit clients.

### **Fees from an audit client**

Self-interest or intimidation threats may arise when the total fees from an audit client represent a large proportion of the total fees of the audit firm. Total fees from any audit client of KPMG Finland don't exceed 10 percent of the annual fee income of KPMG Finland.

### **Conflicts of interest**

Conflicts of interest can arise in situations where KPMG personnel have a personal connection with the client which may interfere, or be perceived to interfere, with their ability to remain objective, or where they are personally in possession of confidential information relating to another party to a transaction. Consultation with the Risk Management Partner is required in these situations.

KPMG International and KPMG Finland policies are also in place to prohibit KPMG partners and staff from accepting gifts and hospitality from audit clients, unless the value is trivial and inconsequential, is not prohibited by relevant law or regulation and is not deemed to be have been offered with the intent to improperly influence

the behavior of the audit team member or the member firm. KPMG partners and staff are also precluded from offering gifts and hospitality, which are made or perceived to be made with the intent to improperly influence the behavior of the recipient or which would cast doubt on the individual's or KPMG's integrity, independence, objectivity or judgment.

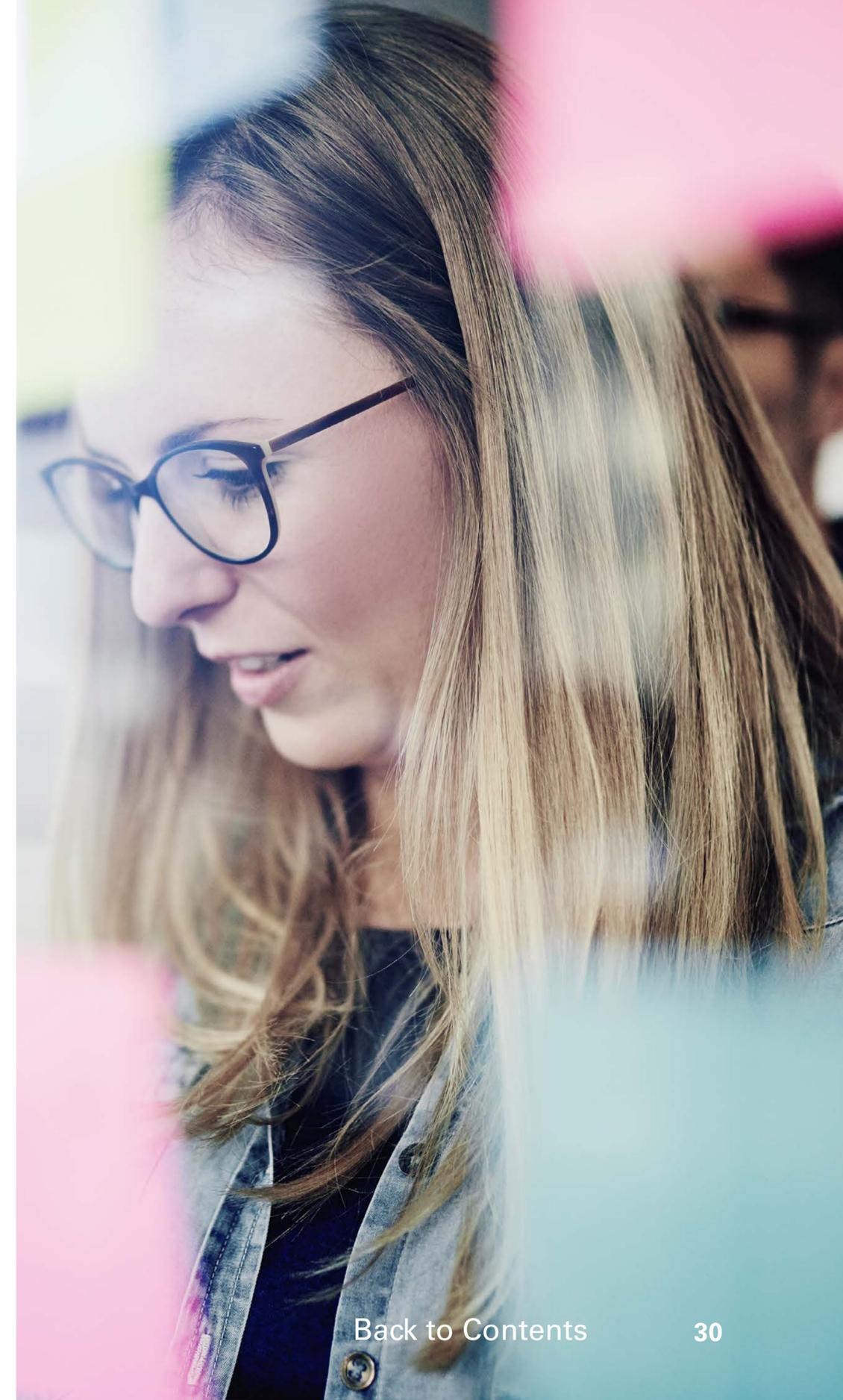
All KPMG member firms and personnel are responsible for identifying and managing conflicts of interest. Sentinel™ is the tool all KPMG member firms use for potential conflict identification so that these can be addressed in accordance with legal and professional requirements.

If a potential conflict issue cannot be appropriately mitigated, the engagement is declined or terminated.

### **Independence breaches**

All KPMG Finland personnel are required to report an independence breach as soon as they become aware of it. In the event of failure to comply with our independence policies, whether identified in the compliance review, self-declared or otherwise, professionals are subject to an independence disciplinary policy.

KPMG Finland has a documented disciplinary policy in relation to breaches of independence policies. The disciplinary policy applies to all breaches of independence rules, incorporating incremental sanctions reflecting the seriousness of any violations. ►





## **Rotation of auditors and audit firm**

### ***Rotation of auditors***

KPMG Finland's rotation policies are based on the Finnish legislation, the EU Audit Regulation and the IESBA Code of Ethics.

KPMG Finland's auditors in certain roles in audit engagements are subject to periodic rotation of their responsibilities for audit clients under applicable laws, regulations, independence rules and KPMG International policy. These requirements place limits on the number of consecutive years that auditors in certain roles may provide statutory audit services to a client, followed by a 'time-out' period during which time they may not:

- participate in the audit;
- provide quality control for the audit;
- consult with the engagement team or the client regarding technical or industry-specific issues;
- in any way influence the outcome of the audit;
- lead or coordinate professional services at the client;
- oversee the relationship of the firm with the audit client; or
- have any other significant or frequent interaction with senior management or those charged with governance at the client.

KPMG Finland monitors the rotation of auditors and develops transition plans to enable allocation of auditors with the necessary competence and capability to deliver a consistent quality of service to clients.

### ***Firm rotation***

In accordance with the Finnish Auditing Act there is a maximum period of 20 years that an audit firm can usually act as an auditor in a public interest entity. After 10 years there is a mandatory tendering after which the same audit firm can continue to act as an auditor for additional

10 years. KPMG Finland has processes in place to track and manage audit firm rotation.

## **Compliance with laws and regulations and prevention of bribery and corruption**

Compliance with laws, regulations and standards is a key aspect for everyone at KPMG Finland. In particular, we have zero tolerance of bribery and corruption. KPMG Finland personnel must complete training covering the following topics: compliance with laws (including anti-bribery and anti-corruption legislation), regulations, professional standards and KPMG's Code of Conduct. In addition, personnel is required to complete training on money laundering legislation.

# KPMG's audit process

On all KPMG audits, the nature and extent of the audit evidence we gather is responsive to the assessed risks. We consider all audit evidence obtained during the course of the audit including contradictory or inconsistent audit evidence. We critically assess audit evidence obtained from all sources. For the purpose of obtaining sufficient appropriate audit evidence each team member is required to exercise professional judgment and maintain professional skepticism throughout the audit engagement.

## Consultation

KPMG Finland promotes a culture in which consultation is recognised as a strength and that encourages personnel to consult on difficult matters. To assist audit engagement professionals in addressing difficult matters, firms are ►



required to have established protocols for consultation and documentation of significant accounting and auditing matters, including procedures to facilitate resolution of differences of opinion on engagement issues.

Technical accounting and auditing support is available to all member firms through the Global Audit Methodology Group (GAMG), KPMG Global Solutions Group (KGSG), the International Standards Group (ISG) as well as the PCAOB Standards Group (PSG) for SEC foreign registrants.

KPMG's audit methodology is developed and maintained by the Global Audit Methodology Group (GAMG). The GAMG develops our audit methodology based on the requirements of the applicable international auditing standards. The KGSG and GAMG work collaboratively to develop among other things the audit tools of the KPMG network.

The International Standards Group works with Global IFRS and International Standards on Auditing topic teams with geographic representation from around the world to promote consistency of interpretation of IFRS and auditing requirements between member firms, identify emerging issues, and develop global guidance on a timely basis.

Technical auditing and accounting support is available to the audit professionals through professional practice resources (referred to as Department of Professional Practice or DPP). The role of DPP is to provide guidance and interpretations to the audit engagement teams on issues related to financial statements, auditing and auditor's reporting. DPP also provides consultation support to

the audit professionals on auditing and accounting related matters. At KPMG technical auditing and accounting support is organized in the Nordic level. Through the Nordic professionals' network, the specific knowledge and expertise in relation to for example IFRS reporting is available to the audit engagement teams when needed.

## KPMG Audit Process

At KPMG Finland audit quality is not just about reaching the right opinion, but how that opinion is reached. We view the outcome of a quality audit as the delivery of an appropriate audit opinion.

The KPMG audit process includes:

- partner and manager involvement
- timely access to the right knowledge – specialists and relevant industry expertise
- critical assessment of audit evidence – exercise of professional judgment and professional skepticism
- ongoing mentoring, supervision, and review
- appropriately supported and documented conclusions
- robust challenge and review, including EQC review.

The auditor in charge is responsible for the quality of the audit engagement and thus for the management, supervision and execution of the engagement. The auditor in charge is responsible for the audit opinion and reviews ►

the key audit documentation, in particular the material matters identified in the audit and the conclusions drawn from them.

### **Engagement Quality Control Review**

The engagement quality control review (EQCR) is an important part of KPMG’s framework for quality. An EQC reviewer is required to be appointed for audits of all listed entities, other Public Interest Entities, non-listed entities with a high public profile and other engagements as designated by the Risk Management Partner.

An EQC review ensures that the team has appropriately identified significant risks, including fraud risks, and has designed and executed audit procedures to address them.

Engagement Quality Control reviewers are independent of the engagement and have the appropriate experience and knowledge to perform an objective review of the more critical decisions and judgments made by the

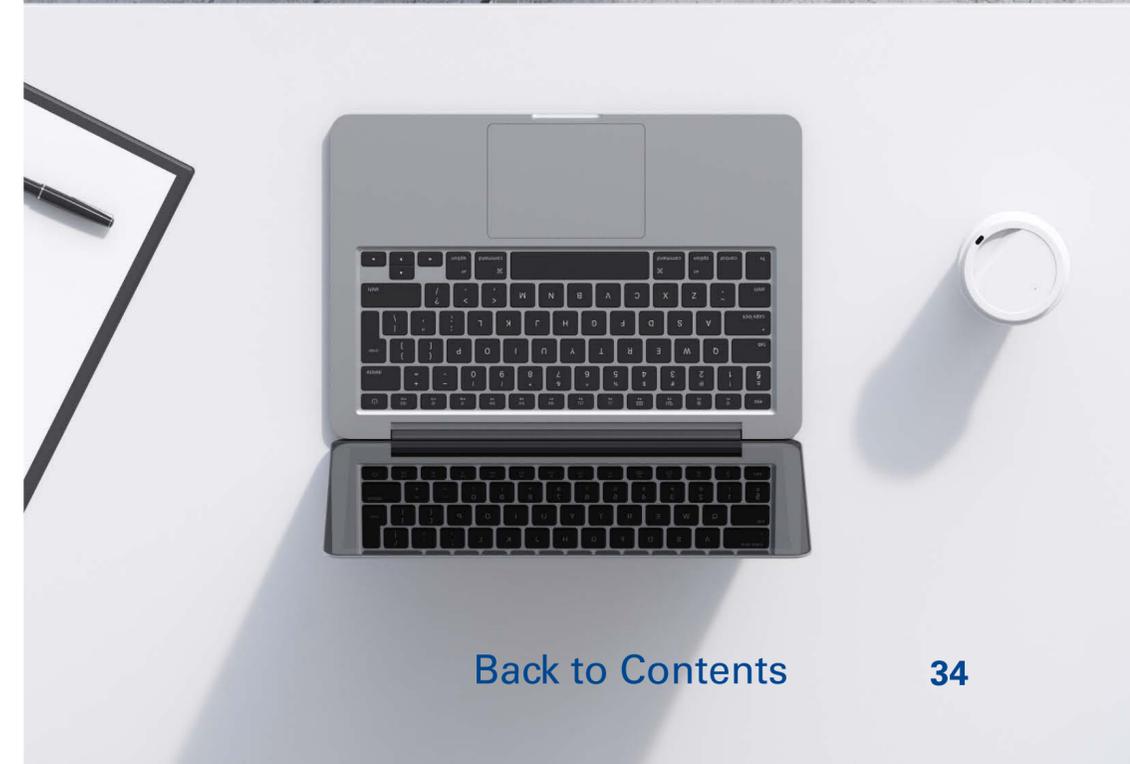
engagement team and the appropriateness of the financial statements.

Although the engagement partner is ultimately responsible for the resolution of financial reporting and auditing matters, the EQC reviewer must be satisfied that all significant questions raised have been resolved before an audit can be considered complete.

For other high-risk engagements, an engagement quality control review or a Limited Scope Quality Control Review is performed depending on the situation.

KPMG is continually seeking to strengthen and improve the role that the EQC review plays in member firm audits and have taken a number of actions to reinforce this, including issuing leading practice guidance, incorporating specific review requirements into our audit workflow, and developing more detailed policies relating to recognition, nomination and development of EQC reviewers.

**KPMG is continually seeking to strengthen and improve the role that the EQC review plays in member firm audits.**



# Assessing risks to quality

At a global level, through the Global Audit Quality Council and the GO&RM Steering Group, KPMG International reviews the results of the quality monitoring programs, reviews firm root causes and planned remedial actions and develops additional global remediation actions as required.



# Communicating effectively

We recognize that another important contributor to upholding audit quality is to obtain and act upon feedback from key stakeholders.

## **Two-way communication with the client**

Two-way communication with those charged with governance, often identified as the Audit Committee or the Board of Directors, is key to audit quality and is a key aspect of reporting and service delivery.

At KPMG Finland we stress the importance of keeping those charged with governance informed of issues

**At KPMG Finland we stress the importance of keeping management and those charged with governance informed of issues arising throughout the audit.**

arising throughout the audit. We achieve this through a combination of reports and presentations, attendance at Audit Committee or board meetings, and, when appropriate, ongoing informal discussions with management and members of the Audit Committee.

## **Insights from our people – Conduct and follow-up on the Global People Survey (GPS)**

KPMG Finland invites all its people to participate in an annual independent Global People Survey which measures their satisfaction and overall level of engagement with the firm.

The GPS provides an overall Engagement Index (EI) as well as insights into areas driving engagement. The survey covers topics directly related to audit quality. All experts involved in audit engagements answer these questions to obtain insights into the quality of the audit.

The survey also specifically provides KPMG Finland leadership and KPMG International leadership with results related to quality and risk behaviors, audit quality, upholding the KPMG Values, employee and partner attitudes to quality, leadership and tone at the top.

KPMG Finland participates in the GPS annually, monitors results and processes the findings of the survey with personnel in workshops. The results of the survey and the actions that will be taken to respond to the findings are communicated to personnel. The KPMG Global Board monitors the aggregated results of the entire global organization and the KPMG Global Audit Steering Group monitors the aggregated results related to audit quality.

# Monitoring and remediation

Integrated quality monitoring and compliance programs enable KPMG firms to identify quality deficiencies, to perform root cause analysis and develop, implement and report remedial action plans, both in respect of individual audit engagements and the overall system of quality control.

## **Monitoring and measuring quality at the local and global level**

### **Commitment to continuous improvement**

We commit to continually improve the quality, consistency and efficiency of our audits. KPMG's quality and monitoring programs are managed globally. The nature and scope of testing and reporting are the same for all KPMG member firms. KPMG Finland monitors the results of both the internal quality and monitoring programs and the Auditor Oversight Unit's quality control programs and takes appropriate actions based on the results. ►





### **Internal monitoring and compliance programs**

Our monitoring programs evaluate both:

- engagement performance in compliance with the applicable standards, applicable laws and regulation and KPMG International policies and procedures
- KPMG Finland compliance with KPMG International policies and procedures and the relevance, adequacy and effective operation of key quality control policies and procedures.

Our internal monitoring programs also contribute to the assessment of whether our system of quality control has been appropriately designed, effectively implemented, and operates effectively. These include Quality Performance Reviews (QPR) and Risk Compliance Programs (RCP), which are conducted annually across the Audit, Tax and Advisory functions.

The results and lessons from the integrated monitoring programs are communicated internally and appropriate action is taken at local, regional and global levels.

### **Audit Quality Performance Reviews (QPRs)**

The QPR program assesses engagement level performance and identifies opportunities to improve engagement quality.

### **Risk-based approach**

Each authorised auditor is reviewed at least once in a 3-year cycle. A risk-based approach is used to select engagements.

KPMG Finland conducts the annual QPR program in accordance with KPMG International QPR instructions. The reviews are performed at KPMG Finland level and are monitored regionally and globally. Member firm Audit QPR reviews are overseen by a foreign senior experienced lead reviewer independent from the member firm.

### **Reviewer selection, preparation and process**

There are robust criteria for selection of reviewers. Review teams include senior experienced lead reviewers that are independent of the firm under review.

Training is provided to review teams and others overseeing the process, with a focus on topics of concern identified by audit oversight regulators and the need to be as rigorous as external reviewers.

### **Evaluations from Audit QPR**

Consistent criteria are used to determine engagement ratings and member firm Audit practice evaluations. Audit engagements selected for review are rated as ‘Satisfactory’, ‘Performance Improvement Needed’ or ‘Unsatisfactory’.

### **Reporting**

Findings from the QPR program are disseminated to member firm professionals through written communications, internal training, and periodic partner, manager and staff meetings.

These areas are also emphasized in subsequent inspection programs to assess the extent of continuous improvement. ►

Lead audit engagement partners are notified of unsatisfactory ratings on their respective cross-border engagements. Additionally, lead audit engagement partners of parent companies/head offices are notified where a subsidiary/affiliate of their client group is audited by a member firm where significant quality issues have been identified during the QPR.

### **Global Audit Quality Monitoring Group (GAQMG)**

The GAQMG is comprised of a team of partners, directors and senior managers experienced in performing QPR program reviews of listed and related entity (LRE) audit engagements. The team also includes partners and professionals with experience in auditing general information technology controls and application controls.

Each of the GAQMG reviewers attends the Global QPR training delivered for their respective member firm. The GAQMG team is responsible for performing selected QP reviews of LRE audit engagements.

### **Risk Compliance Program (RCP)**

KPMG International develops and maintains quality control policies and processes that apply to all member firms. These policies and processes, and their related procedures, include the requirements of ISQC 1. During the annual RCP, we perform an assessment program consisting of documentation of quality controls and procedures, related compliance testing and reporting of exceptions, action plans and conclusions.

The objectives of the RCP are to:

- monitor, document and assess the extent of compliance of KPMG Finland’s system of quality control with Global Quality & Risk Management policies and key legal and regulatory requirements relating to the delivery of professional services
- provide the basis for KPMG Finland to evaluate that the firm and its personnel comply with relevant professional standards and applicable legal and regulatory requirements.

Where deficiencies are identified, we are required to develop appropriate action plans and monitor the status of the action plans.

### **Global Quality & Compliance Review (GQ&CR) program**

Each member firm is subject to a Global Quality & Compliance Review (GQ&CR) conducted at various intervals based on identified risk criteria. The GQ&CR team performing the reviews is independent of the firm and is objective and knowledgeable of Global Quality & Risk Management policies.

GQ&CRs assess compliance with selected KPMG International policies and procedures and share best practices among member firms.

- The GQ&CR provides an independent assessment of:
- a firm’s commitment to quality and risk management (tone at the top) and the extent to which its overall

structure, governance and financing support and reinforce this commitment;

- a firm’s compliance with KPMG global policies and procedures; and
- the robustness with which the member firm performs its own compliance program (RCP).

The latest GQ&CR was conducted in Finland in January 2021. KPMG Finland has developed action plans to respond to all GQ&CR findings that indicate improvement is required and agree these with the GQ&CR team. Our progress on action plans is monitored by the GQ&CR central team. Results are reported to the GQ&RM Steering Group and where necessary, to appropriate KPMG International and regional leadership.

### **Area Quality & Risk Management Leaders**

The Global Head of Quality, Risk and Regulatory appoints Area Quality & Risk Management Leaders (ARLs) who serve a regular and ongoing monitoring function to assess the effectiveness of a member firm’s efforts and processes to identify, manage and report significant risks that have the potential to damage the KPMG brand. Significant activities of the ARL, including member firm issues identified and related member firm response/remediation, are reported to Global Quality & Risk Management leadership. ►

## Obtain, evaluate and act on stakeholder feedback

### Regulators

In Finland the Auditor Oversight Unit at the Finnish Patent and Registration Office (PRH) has been carrying out independent inspections since the beginning of 2016.

The Auditor Oversight Unit performed quality control inspections of KPMG's auditors and audit engagements during the financial period October 1, 2020 to September 30, 2021. 26 KPMG auditors have been subject to quality control inspections. In September 2021, the Auditor Oversight Unit performed a quality control inspection of KPMG Oy Ab's quality control system.

KPMG Finland is also registered with the US PCAOB and the Japanese Financial Services Authority.

Based on the results and findings of the regulator's quality control inspections, we prepare root cause analyses and action plans aimed at addressing and correcting the identified deficiencies and further strengthening our policies and procedures.

The KPMG Network has regular contacts with international and EU-level oversight bodies about audit findings and measures to address them.

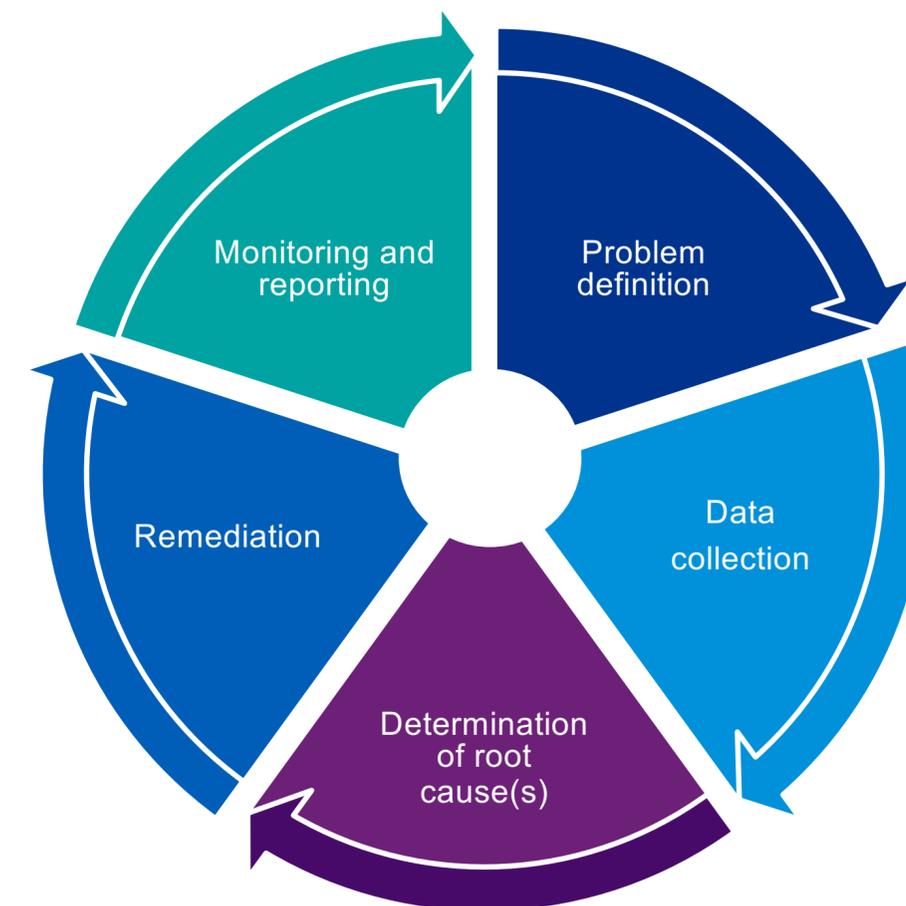
### Client feedback

We are constantly developing our services and operations based on our customers' expectations, needs and feedback. Besides, we actively seek feedback from clients through in-person conversations and third-party surveys to monitor their satisfaction with services delivered. We monitor and measure our clients' level of customer experience using KPMG's "The Six Pillars" approach.

## Root cause analysis

KPMG Finland conducts root cause analyses to identify and address deficiencies and development needs in audit quality in order to prevent the recurrence of such findings and to identify good practices as part of continuous improvement. KPMG Finland's Head of Audit & Assurance is responsible for audit quality including remediation of audit quality issues. Audit Quality Leader Lotta Nurminen has been appointed as the person in charge of performing root cause analyses (RCA Leader). The Risk Management Partner monitors the implementation of the action plans.

### The KPMG Global Root Cause Analysis 5 Step Principles are as follows:



## Statement by the Board of Directors of KPMG Oy Ab on the effectiveness of quality controls and independence

The measures and procedures that serve as the basis for the system of quality control for KPMG Finland outlined in this report aim to provide a reasonable degree of assurance that the statutory audits carried out by our firm comply with the applicable laws and regulations. Because of its inherent limitations, the system of quality controls is not intended to provide absolute assurance that non-compliance with relevant laws and regulations would be prevented or detected.

The Board of Directors has considered:

- the design and operation of the quality control systems as described in this report;
- the findings from our internal and KPMG International compliance monitoring programs; and
- findings from regulatory inspections.

Taking all of this evidence together, the Board of Directors concludes with a reasonable level of assurance that the systems of quality control within our firm have operated effectively during the financial year 1.10.2020–30.9.2021.

Further, we confirm that an internal review of independence compliance within our firm has been conducted during the financial year 1.10.2020–30.9.2021.

Helsinki 19 November 2021  
KPMG Oy Ab  
Audit firm



Esa Kailiala  
Chairman of the Board of Directors



Kimmo Antonen  
Chief Executive Officer

# Appendix 1 Financial information

<b>Service</b>	<b>FY 2020–2021 Revenue (k€)</b>	<b>FY 2019–2020 Revenue (k€)</b>
Revenues from the statutory audit of annual and consolidated financial statements of public interest entities and entities belonging to a group of undertakings whose parent undertaking is a public interest entity	17 763	15 842
Revenues from the statutory audit of annual and consolidated financial statements of other entities	43 895	40 268
Revenues from permitted non-audit services to entities that are audited by the firm	38 858	34 423
Revenues from non-audit services to other entities	85 752	68 951
<b>Total</b>	<b>186 268</b>	<b>159 484</b>

*The financial information above does not include revenues of the Estonian entities of the KPMG Oy Ab group which are presented in KPMG Baltics OÜ's transparency report.*

# Appendix 2 Our public interest entity audit clients

Below there is a list of public interest entities for whom KPMG Oy Ab acted as auditor during the financial year of 1 October 2020 – 30 September 2021. The definition of a public interest entity used in this context corresponds to the definition used in the Accounting Act (1336/1997, as amended).

## Publicly listed companies

Adapteo Oyj  
Ahlstrom-Munksjö Oyj  
Aktia Bank Abp  
Bonum Pankki Oyj  
Capnor Weasel Bidco Oyj  
Delete Group Oyj  
Digia Oyj  
Digitalist Group Oyj  
EAB Group Oyj  
Eezy Oyj  
Elisa Oyj  
Enedo Oyj  
Enersense International Oyj  
eQ Oyj  
Etteplan Oyj  
Finnair Oyj  
Finnvera Oyj  
Glaston Oyj Abp  
Gofore Oyj  
Huhtamäki Oyj  
Investors House Oyj  
Kojamo Oyj  
Kreate Group Oyj  
Kuntarahoitus Oyj  
Lassila & Tikanoja Oyj  
Lehto Group Oyj  
Marimekko Oyj  
Metsä Board Oyj

Neste Oyj  
Nokian Renkaat Oyj  
Oma Säästöpankki Oyj  
Op-Asuntoluottopankki Oyj  
OPYrityspankki Oyj  
Optomed Oyj  
Oriola Oyj  
Orion Oyj  
Pihlajalinna Oyj  
Ponsse Oyj  
QPR Software Oyj  
Qt Group Oyj  
Raisio Oyj  
Reka Industrial Oyj  
Saga Furs Oyj  
Scanfil Oyj  
Sievi Capital Oyj  
Siili Solutions Oyj  
Sitowise Group Oyj  
Solteq Oyj  
Soprano Oyj  
Stockmann Oyj Abp  
Säästöpankkien Keskuspankki Suomi Oyj  
Talenom Oyj  
Teleste Oyj  
Terveystalo Oyj  
Tulikivi Oyj  
Työllisyysrahasto  
Uponor Oyj

Virala Acquisition Company Oyj  
Ålandsbanken Abp

## Other public interest entities

Aito Säästöpankki Oy  
Aktia Livförsäkring Ab  
Alajärven Osuuspankki  
Ala-Satakunnan Osuuspankki  
Alavieskan Osuuspankki  
Alavuden Seudun Osuuspankki  
Andelsbanken för Åland  
Andelsbanken Raseborg  
Artjärven Osuuspankki  
Askolan Osuuspankki  
Etelä-Hämeen Osuuspankki  
Etelä-Karjalan Osuuspankki  
Etelä-Pirkanmaan Osuuspankki  
Etelä-Pohjanmaan Osuuspankki  
Eurajoen Säästöpankki  
Euran Osuuspankki  
Haapamäen Seudun Osuuspankki  
Hailuodon Osuuspankki  
Halsua-Ylipään Osuuspankki  
Helsingin Seudun Osuuspankki  
Himangan Osuuspankki  
Humppilan-Metsämaan Osuuspankki  
Itä-Uudenmaan Osuuspankki  
Janakkalan Osuuspankki  
Jokioisten Osuuspankki

Jämsän Seudun Osuuspankki  
Järvi-Hämeen Osuuspankki  
Kainuun Osuuspankki  
Kangasalan Seudun Osuuspankki  
Kangasniemen Osuuspankki  
Kannonkosken Osuuspankki  
Kemin Seudun Osuuspankki  
Kerimäen Osuuspankki  
Keskinäinen Eläkevakuutusyhtiö Ilmarinen  
Keskinäinen Vakuutusyhtiö Fennia  
Keskinäinen Vakuutusyhtiö Turva  
Keski-Pohjanmaan Osuuspankki  
Keski-Suomen Osuuspankki  
Keuruun Osuuspankki  
Kiteen Seudun Osuuspankki  
Koitin-Pertunmaan Osuuspankki  
Konneveden Osuuspankki  
Korpilahden Osuuspankki  
Korsnäs Andelsbank  
Kosken Osuuspankki  
Kronoby Andelsbank  
Kuhmon Osuuspankki  
Kuortaneen Osuuspankki  
Kurun Osuuspankki  
Kuusamon Osuuspankki  
Kymenlaakson Osuuspankki  
Kyyjärven Osuuspankki  
Kärkölän Osuuspankki  
Laihian Osuuspankki

Lammin Osuuspankki  
Lammin Säästöpankki  
Lanneveden Osuuspankki  
Lapin Osuuspankki  
Lehtimäen Osuuspankki  
Lemin Osuuspankki  
Liedon Osuuspankki  
Limingan Osuuspankki  
Liperin Osuuspankki  
Loimaan Osuuspankki  
LokalTapiola Sydusten  
Ömsesidigt Försäkringsbolag  
Lounaismaan Osuuspankki  
Lounaisrannikon Osuuspankki  
Lounais-Suomen Osuuspankki  
Luhangan Osuuspankki  
Luopioisten Osuuspankki  
Luumäen Osuuspankki  
LähiTapiola Etelä Keskinäinen Vakuutusyhtiö  
LähiTapiola Etelä-Pohjanmaa  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Itä Keskinäinen Vakuutusyhtiö  
LähiTapiola Kaakkois-Suomi  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Kainuu-Koillismaa  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Keskinäinen Henkivakuutusyhtiö  
LähiTapiola Keskinäinen Vakuutusyhtiö  
LähiTapiola Keski-Suomi  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Lappi Keskinäinen Vakuutusyhtiö  
LähiTapiola Loimi-Häme  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Länsi-Suomi  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Pirkanmaa  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Pohjanmaa  
Keskinäinen Vakuutusyhtiö

LähiTapiola Pohjoinen Keskinäinen Vakuutusyhtiö  
LähiTapiola Pääkaupunkiseutu  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Savo Keskinäinen Vakuutusyhtiö  
LähiTapiola Savo-Karjala  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Uusimaa  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Varsinais-Suomi  
Keskinäinen Vakuutusyhtiö  
LähiTapiola Vellamo Keskinäinen Vakuutusyhtiö  
Länsi-Kymen Osuuspankki  
Länsi-Suomen Osuuspankki  
Länsi-Uudenmaan Säästöpankki  
Maaningan Osuuspankki  
Miehikkälän Osuuspankki  
Mietoisten Säästöpankki  
Mouhijärven Osuuspankki  
Multian Osuuspankki  
Mäntsälän Osuuspankki  
Nagu Andelsbank  
Nakkila-Luvian Osuuspankki  
Niinijokivarren Osuuspankki  
Nilakan Seudun Osuuspankki  
Nivalan Järvikylän Osuuspankki  
Nivalan Osuuspankki  
Nooa Säästöpankki Oy  
OP Vähittäisasiakkaat Oyj  
OP-Henkivakuutus Oy  
Orimattilan Osuuspankki  
Osuuspankki Harjuseutu  
Osuuspankki Kantrisalo  
Osuuspankki Vakka-Auranmaa  
Oulaisten Osuuspankki  
Oulun Osuuspankki  
Outokummun Osuuspankki  
Paltamon Osuuspankki  
Pedersörenejdens Andelsbank

Pensionsförsäkringsaktiebolaget Veritas  
Perhon Osuuspankki  
Perhonjokilaakson Osuuspankki  
Peräseinäjoen Osuuspankki  
Petäjäveden Osuuspankki  
Pohjois-Hämeen Osuuspankki  
Pohjois-Karjalan Osuuspankki  
Pohjois-Savon Osuuspankki  
Pohjola Vakuutus Oy  
Pohjolan Osuuspankki  
Polvijärven Osuuspankki  
Posion Osuuspankki  
Pudasjärven Osuuspankki  
Pukkilan Osuuspankki  
Pulkkilan Osuuspankki  
Punkalaitumen Osuuspankki  
Purmo Andelsbank  
Päijät-Hämeen Osuuspankki  
Raahentienoon Osuuspankki  
Rantasalmen Osuuspankki  
Rautalammin Osuuspankki  
Riistaveden Osuuspankki  
Rymättylän Osuuspankki  
Rääkkylän Osuuspankki  
Sallan Osuuspankki  
Sastamalan Osuuspankki  
Satakunnan Osuuspankki  
Satapirkan Osuuspankki  
Savitaipaleen Osuuspankki  
Siikajoen Osuuspankki  
Siikalatvan Osuuspankki  
Siilinjärven Osuuspankki  
Someron Säästöpankki  
S-Pankki Oyj  
Sp-Henkivakuutus Oy  
Sp-Kiinnitysluottopankki Oyj  
Suomen Keskinäinen Potilasvakuutusyhtiö

Suomen Vahinkovakuutus Oy  
Suomenselän Osuuspankki  
Suur-Savon Osuuspankki  
Säästöpankki Kalanti-Pyhäranta  
Säästöpankki Optia  
Säästöpankki Sinetti  
Taivalkosken Osuuspankki  
Tampereen Seudun Osuuspankki  
Tervolan Osuuspankki  
Tervon Osuuspankki  
Toholammin Osuuspankki  
Tornion Osuuspankki  
Turun Seudun Osuuspankki  
Tuusniemen Osuuspankki  
Tyrvävän Osuuspankki  
Ullavan Osuuspankki  
Utajärven Osuuspankki  
Uudenmaan Osuuspankki  
Vaara-Karjalan Osuuspankki  
Vakuutusosakeyhtiö Bothnia International  
Vakuutusosakeyhtiö Henki-Fennia  
Vasa Andelsbank  
Vehmersalmen Osuuspankki  
Vesannon Osuuspankki  
Vimpelin Osuuspankki  
Ylitornion Osuuspankki  
Ylä-Kainuun Osuuspankki  
Yläneen Osuuspankki  
Ylä-Pirkanmaan Osuuspankki  
Ylä-Savon Osuuspankki  
Ypäjän Osuuspankki  
Ålands Försäkringar Ab  
Ålands Ömsesidiga Försäkringsbolag

# Appendix 3 List of KPMG audit entities located in the EU & EEA

## As at 30 September 2021

This is a list of KPMG audit firms as defined in Article 2(3) of EU Directive 2006/43/EC which are located in EU/EEA countries. It has been prepared solely for the purpose of compliance by KPMG member firms with Regulation (EU) No 537/2014 on specific requirements regarding statutory audit of public-interest entities and repealing Commission Decision 2005/909/EC. It is prepared on behalf of KPMG International Limited, a company limited by guarantee incorporated in England and Wales, which provides no professional services to clients. To the best of our knowledge, the list is accurate as of 30 September 2021. However, we cannot and do not warrant its accuracy at any given time.

Austria	KPMG Austria GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft (Wien)
Austria	KPMG Alpen-Treuhand GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft (Wien)
Austria	KPMG Austria GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft (Linz)
Austria	KPMG Nieder sterreich GmbH Wirtschaftsprüfungs- und Steuerberatungsgesellschaft
Belgium	KPMG Bedrijfsrevisoren/KPMG R viseurs d'Entreprises
Bulgaria	KPMG Audit OOD
Croatia	KPMG Croatia d.o.o. za reviziju
Cyprus	KPMG
Cyprus	KPMG Limited
Czech Republic	KPMG Česk republika Audit, s.r.o.
Denmark	KPMG P/S
Estonia	KPMG Baltics O
Finland	KPMG Oy Ab
Finland	KPMG Julkistarkastus Oy
France	KPMG Associ s S.A.
France	KPMG Audit Est S.A.S.
France	KPMG Audit FS I S.A.S.
France	KPMG Audit ID S.A.S.
France	KPMG Audit IS S.A.S.
France	KPMG Audit Nord S.A.S.
France	KPMG Audit Ouest S.A.S.

France	KPMG Audit Paris et Centre S.A.S.
France	KPMG Audit Rhône Alpes Auvergne S.A.S.
France	KPMG Audit Sud-Est S.A.S.
France	KPMG Audit Sud-Ouest S.A.S.
France	KPMG Fiduciaire de France
France	KPMG SA
France	SALUSTRO REYDEL S.A.
Germany	KPMG AG Wirtschaftsprüfungsgesellschaft
Germany	KPMG Bayerische Treuhandgesellschaft Aktiengesellschaft Wirtschaftsprüfungsgesellschaft Steuerberatungsgesellschaft
Greece	KPMG Certified Auditors S.A.
Greece	KPMG Auditing A.E.
Hungary	KPMG Hungária Kft./KPMG Hungary Ltd.
Iceland	KPMG ehf.
Ireland	KPMG
Italy	KPMG S.p.A.
Italy	KPMG Audit S.p.A.
Latvia	KPMG Baltics SIA
Liechtenstein	KPMG (Liechtenstein) AG
Lithuania	'KPMG Baltics' UAB
Luxembourg	KPMG Luxembourg
Malta	KPMG
Netherlands	KPMG Accountants N.V.
Norway	KPMG Holding AS
Norway	KPMG AS
Poland	KPMG Audyt Services Sp z.o.o.
Poland	KPMG Audyt Sp. Z ograniczoną odpowiedzialnością
Poland	KPMG Audyt Sp. Z ograniczoną odpowiedzialnością Spółka Komandytowa
Portugal	KPMG & Associados — Sociedade de Revisores Oficiais de Contas, S.A.
Romania	KPMG Audit SRL
Slovakia	KPMG Slovensko spol. s r.o.
Slovenia	KPMG Slovenija, podjetje za revidiranje, d.o.o.
Spain	KPMG Auditores, S.L.
Sweden	KPMG AB

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