

U.S. Department of Justice

Washington, DC 20530

Exhibit A to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .22 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

Business Finland USA, Inc.

2. Registration Number

7318

3. Primary Address of Registrant

Consulate General of Finland, Finland Trade Center, 605 Third Avenue, 35 Floor, New York, NY 10158

4. Name of Foreign Principal

Business Finland Oy

5. Address of Foreign PrincipalP.O. Box 358, Porkkalankatu 1, FI-00181
Helsinki
FINLAND**6. Country/Region Represented**

FINLAND

7. Indicate whether the foreign principal is one of the following:☐ Government of a foreign country¹☐ Foreign political party☒ Foreign or domestic organization: If either, check one of the following:☐ Partnership☐ Committee☒ Corporation☐ Voluntary group☐ Association☐ Other (*specify*) _____☐ Individual-State nationality _____**8. If the foreign principal is a foreign government, state:**

a) Branch or agency represented by the registrant

b) Name and title of official(s) with whom registrant engages

¹ "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

9. If the foreign principal is a foreign political party, state:

- a) Name and title of official(s) with whom registrant engages
- b) Aim, mission or objective of foreign political party

10. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

Business Finland OY supports the growth of Finnish companies and advises Finnish companies on their internationalization plans and actions. Business Finland Oy also engages in activities for attracting foreign investments and talents to Finland, and promotes travel to Finland.

b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal	Yes ☒ No ☐
Owned by a foreign government, foreign political party, or other foreign principal	Yes ☒ No ☐
Directed by a foreign government, foreign political party, or other foreign principal	Yes ☒ No ☐
Controlled by a foreign government, foreign political party, or other foreign principal	Yes ☒ No ☐
Financed by a foreign government, foreign political party, or other foreign principal	Yes ☒ No ☐
Subsidized in part by a foreign government, foreign political party, or other foreign principal	Yes ☒ No ☐

11. Explain fully all items answered "Yes" in Item 10(b).

See Appendix for Response

12. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

08/30/2023Mirja Muovinen/s/Mirja Muovinen

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

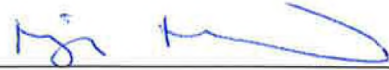
Date

Printed Name

Signature

August 30, 2023

MIRJA HUOVINEN



Appendix

Response to Item 11

Item 11: Explain fully all items answered "Yes" in Item 10(b).

Item 10(b) Supervised: Business Finland Oy is 100 % owned by the State of Finland. Business Finland Oy is supervised and managed by the Finnish state agency called Innovation Funding Agency Business Finland, which in turn falls under the mandate and supervision of the Finnish Ministry of Economic Affairs and Employment.

Item 10(b) Owned: The Registrant is one hundred (100%) percent owned by the Finnish non-profit limited liability company Business Finland Oy (foreign principal). Business Finland Oy is 100 % owned by the State of Finland. Business Finland Oy is supervised and managed by the Finnish state agency called Innovation Funding Agency Business Finland, which in turn falls under the mandate and supervision of the Finnish Ministry of Economic Affairs and Employment.

Item 10(b) Directed: The Registrant is one hundred (100%) percent owned by the Finnish non-profit limited liability company Business Finland Oy (foreign principal). Business Finland Oy is 100 % owned by the State of Finland. Business Finland Oy is supervised and managed by the Finnish state agency called Innovation Funding Agency Business Finland, which in turn falls under the mandate and supervision of the Finnish Ministry of Economic Affairs and Employment.

Item 10(b) Controlled: The Registrant is one hundred (100%) percent owned by the Finnish non-profit limited liability company Business Finland Oy (foreign principal). Business Finland Oy is 100 % owned by the State of Finland. Business Finland Oy is supervised and managed by the Finnish state agency called Innovation Funding Agency Business Finland, which in turn falls under the mandate and supervision of the Finnish Ministry of Economic Affairs and Employment.

Item 10(b) Financed: The Registrant is one hundred (100%) percent owned by the Finnish non-profit limited liability company Business Finland Oy (foreign principal). Business Finland Oy is 100 % owned by the State of Finland. Business Finland Oy is supervised and managed by the Finnish state agency called Innovation Funding Agency Business Finland, which in turn falls under the mandate and supervision of the Finnish Ministry of Economic Affairs and Employment.

Item 10(b) Subsidized: The Registrant is one hundred (100%) percent owned by the Finnish non-profit limited liability company Business Finland Oy (foreign principal). Business Finland Oy is 100 % owned by the State of Finland. Business Finland Oy is supervised and managed by the Finnish state agency called Innovation Funding Agency Business Finland, which in turn falls under the mandate and supervision of the Finnish Ministry of Economic Affairs and Employment.

U.S. Department of Justice

Washington, DC 20530

Exhibit B to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .32 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant
Business Finland USA, Inc.

2. Registration Number
7318

3. Name of Foreign Principal
Business Finland Oy

Check Appropriate Box:

4. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☒ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. What is the date of the contract or agreement with the foreign principal? 01/01/2018
8. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Business Finland USA, Inc. has been established and owned from the beginning from the Finnish export promotion organization called Finpro Ry. Due to various organizational and name changes in Finnish export/invest in/travel promotion organizations over the years, Business Finland USA, Inc's name has been changed from Finpro USA, Inc. to Business Finland USA, Inc, which has been controlled by Business Finland Oy as from the beginning of 2018.

9. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The registrant supports the growth of Finnish companies in the United States and advises Finnish companies on their internationalization plans and actions. The registrant also engages in activities for attracting foreign investments and talents to Finland. In addition to companies, the registrant may also communicate with authorities and industry representatives in the United States to build strong relationships and for sharing best practices. The registrant also participates in activities which promote travel between Finland and the United States.

10. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act¹.

Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

See Appendix for Response

11. Prior to the date of registration² for this foreign principal has the registrant engaged in any registrable activities, such as political activities, for this foreign principal?

Yes ☒ No ☐

If yes, describe in full detail all such activities. The response should include, among other things, the relations, interests, and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored, or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers, and subject matter. The response must also include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's activities, including political activities.

See Appendix for Response

Set forth below in the required detail the registrant's political activities.

Date	Contact	Method	Purpose
See Appendix for Response			

12. During the period beginning 60 days prior to the obligation to register³ for this foreign principal, has the registrant received from the foreign principal, or from any other source, for or in the interests of the foreign principal, any contributions, income, money, or thing of value either as compensation, or for disbursement, or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail an account of such monies or things of value.

Date Received	From Whom	Purpose	Amount/Thing of Value
06/12/2023- 06/12/2023	Business Finland Oy	Operational Costs	\$ 208,775.05
07/10/2023- 07/10/2023	Business Finland Oy	Operational Costs	\$ 142,490.75
			\$ 351,265.80
			Total

13. During the period beginning 60 days prior to the obligation to register⁴ for this foreign principal, has the registrant disbursed or expended monies, or disposed of anything of value other than money, in connection with activity on behalf of the foreign principal or transmitted monies to any such foreign principal?

Yes ☒ No ☐

If yes, set forth below in the required detail an account of such monies or things of value.

Date	Recipient	Purpose	Amount/Thing of Value
06/01/2023- 06/30/2023	Employees	Salary	\$ 146,300.00
06/01/2023- 06/30/2023	Administration	Accounting/Legal/Administrative Expenses	\$ 28,200.00
06/01/2023- 06/30/2023	Travel	Travel/Meeting Expenses	\$ 8,500.00
06/01/2023- 06/30/2023	Landlord	Office Rent	\$ 5,000.00
			\$ 188,000.00
			Total

¹ "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

^{2,3,4} Pursuant to Section 2(a) of the Act, an agent must register within ten days of becoming an agent, and before acting as such.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

08/30/2023

Mirja Huovinen

/s/Mirja Huovinen

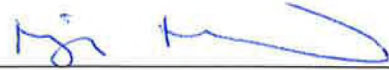
EXECUTION

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Date

Printed Name

Signature

August 30, 2023MIRJA HUOVINEN

Appendix

Response to Item 10

Item 10: Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act. If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

The registrant supports the growth of Finnish companies in the United States and advises Finnish companies on their internationalization plans and actions. The registrant also engages in activities for attracting foreign investments and talents to Finland. In addition to companies, the registrant may also communicate with authorities and industry representatives in the United States to build strong relationships and for sharing best practices. The registrant also participates in activities which promote travel between Finland and the United States.

Appendix

Response to Item 11-Description

The registrant's activities have been the same prior to the registration. Business Finland USA, Inc has been established and/owned from the beginning by the Finnish export promotion organization called Finpro Ry. Due to various organizational and name changes in Finnish export/invest in/travel promotion organization over the years, Business Finland USA, Inc's name has been changed from Finpro USA, Inc to Business Finland USA, Inc and has been controlled by Business Finland Oy from the beginning of 2018.

The registrant supports the growth of Finnish companies in the United States and advises Finnish companies on their internationalization plans and actions. The registrant also engages in activities for attracting foreign investments and talents to Finland. In addition to companies, the registrant may also communicate with authorities and industry representatives in the United States to build strong relationships and for sharing best practices. The registrant also participates in activities which promote travel between Finland and the United States.

Appendix
Response to Item 11-Detail

Date	Contact	Method	Purpose
01/01/2018	Potential sources of foreign investment in Finland.	Personal contacts, conferences, panels, roadshows, and webinars.	The registrant supports the growth of Finnish companies in the United States and advises Finnish companies on their internationalization plans and actions. The registrant also engages in activities for attracting foreign investments and talents to Finland. In addition to companies, the registrant may also communicate with authorities and industry representatives in the United States to build strong relationships and for sharing best practices. The registrant also participates in activities which promote travel between Finland and the United States.