

Living
Information

Code of Conduct—

Alma Media Corporation 2016



Alma Media's Code of Conduct

This Code of Conduct approved by Board of Directors of Alma Media Corporation part of Alma Media's Sustainable Media corporate responsibility programme and it applies to all employees of Alma Media and its subsidiaries regardless of their position in the organisation and the nature of their employment. This Code of Conduct describes how we maintain the trust of our stakeholders by operating ethically, responsibly and in line with our values. This Code of Conduct is supplemented by additional guidelines such as the journalistic and ethical principles of editorial offices and Alma Media's Group policies, such as the HR Guidelines and Guidelines for Insiders.

1. Alma Media's employees

Everything we do is guided by our shared values: freedom and pluralism of journalism, team play and courage. Everyone at Alma Media has the duty to be familiar with these values and understand their impact and significance on both an individual level and with respect to the work community. The values of our business units support and complement these core values shared by everyone in the organisation.

In line with our values, we believe that building the future of media requires a body of employees that is as diverse as possible. Alma Media recruits and employs people based on their competence and aptitude, regardless of their gender, age, religious beliefs, nationality, sexual orientation or disabilities.

Alma Media employees are entitled to fair and rewarding compensation, opportunities to develop their skills and abilities, receive feedback, remain informed of company matters, work in a safe, pleasant, renewal-oriented and developing environment that is free from discrimination, and with respect for everyone's privacy and private life.

As Alma Media employees, we do our best to communicate honestly and openly with everyone interested in our company and its operations. When representing our company outside the workplace, we must keep in mind that our conduct has an effect on the company's reputation.

As a signatory to the UN Global Compact initiative, Alma Media supports the ten basic principles of the Global Compact and promotes them among its stakeholders.

2. Acting in the best interest of Alma Media Group

Alma Media employees are loyal to their employer and refrain from engaging in any activity that is in conflict with Alma Media's interest:

- We do not engage, either as private individuals or entrepreneurs, in any activity that is in competition with Alma Media and its business units.
- We do not give preferential treatment to companies owned by ourselves or members of our immediate circle when working in the name of Alma Media Group.

- We carefully look after the Group's tangible and intangible property and remember that it is not our personal property.
- We handle information about the Group and its plans carefully and refrain from disclosing any such information to anyone inside or outside the Group without due authorisation. We do not use the information we receive to pursue our personal interest.
- In case we handle in our work insider information we comply with the Group Guidelines for Insiders and relevant legislation in all matters related to insiders. We do not make unauthorised use of, or disclose to others, any material unpublished information pertaining to Alma Media.
- We comply with the Group Communication and Disclosure Policy in all communications.

3. Collaboration and partnerships

Successful business operations involve networking and partner relationships between various operators. We treat our partners fairly and equally and our purchasing decisions are based on objective criteria, such as price, quality, delivery capacity and responsibility of the potential partner.

We do not condone corruption of any kind, neither in the private nor the public sector. Therefore, we do not give, demand, receive or accept gifts, payments, services or other benefits in which the counterparty is a current or potential business partner, if the gift, payment, service or other benefit can be reasonably considered to influence decision-making and it exceeds the limits of ordinary hospitality. We also do not condone the use of small bribes intended to speed up decisions by the authorities.

We respect intellectual property rights, copyright, patents, trademarks and business secrets and the confidential nature of our partnerships.

4. Customers

We are trustworthy deliverers of messages, interpreters of information and developers of services in a pluralistic society. We offer our digital services and newspapers so that they are available to everyone. The principles of openness and interactivity guide our operations as part of communities.

We treat our customers equally and in compliance with competition law. Our pricing and terms of trade are transparent and fair. We exercise confidentiality in handling and storing customer data and respect the privacy of our customers.

5. Compliance with laws, regulations and guidelines

Our business operations are based on a commitment to honesty, incorruptibility and compliance with all laws, regulations and guidelines relevant to our operations everywhere we operate.

The guidelines based on legislation are complemented by the Group's and its subsidiaries' own guidelines, which apply to all operations.

In our relationships with competitors, customers and other stakeholders, we compete fairly and honestly, always taking competition law into consideration. We do not participate in cartels or discuss contract terms, prices or other competition-related details with our competitors.

6. Alma Media in society

Operating responsibly makes it possible for us to fulfil our value proposition. In order to ensure reliability, freedom of speech and independence, Alma Media's digital services, newspapers and other operations not only comply with laws and regulations, but also apply ethical self-regulation of the media industry as well as journalistic guidelines and their own ethical guidelines.

We respect general and equal human rights and reject illegal or inhumane working conditions.

We take the environment into account in all our decisions and actions to minimise the environmental impact of our operations.

We promote financially, ecologically, socially and culturally sustainable development both in our own operations and as part of the broader industry, and we also promote the characteristics of corporate responsibility in the media industry, such as the reliability of media content, environmental responsibility and promoting freedom of speech.

7. Commitment to Alma Media's Code of Conduct

Employees of Alma Media and its business units undertake to comply with this Code of Conduct and other Group policies which are relevant in their work. We also expect our business partners to operate responsibly and we try to ensure in appropriate way that our business partners comply in material respect with the operating methods described in this Code of Conduct.

Any violations of this Code of Conduct must be immediately reported to a supervisor, Human Resources representative or the Group General Counsel. Employees also have the opportunity to report conduct that is in violation of this Code of Conduct, other operating principles or legislation via the Alma Whistleblow



reporting channel. Instructions on the use of the whistleblowing channel are available on Alma Media's intranet and website.

Whistleblower reports can be submitted in the whistleblower's native language and they are handled in strict confidence. We do not condone any retaliation or countermeasures against people who submit a whistleblower report in good faith.

Following the decision of Board of Directors Group Legal shall receive the messages and shall handle them in appropriate way with Whistleblow team consisting of Group General Counsel, CFO and HR Director. Whistleblow team shall report to Audit committee of Board of Directors.

A copy of this Code of Conduct will be distributed to every Alma Media employee. The Code of Conduct will also be available on the Alma Media intranet and website. Every supervisor must ensure that this Code of Conduct is available to employees and, if necessary, review the Code of Conduct with employees. In the event of any ambiguity or questions regarding this Code of Conduct, employees should seek assistance and clarification from their supervisors.

The President and CEO of Alma Media Corporation is entitled to make technical changes to this Code of Conduct.

Helsinki, 20 June 2016

Kai Telanne

President and CEO

Alma Media Corporation