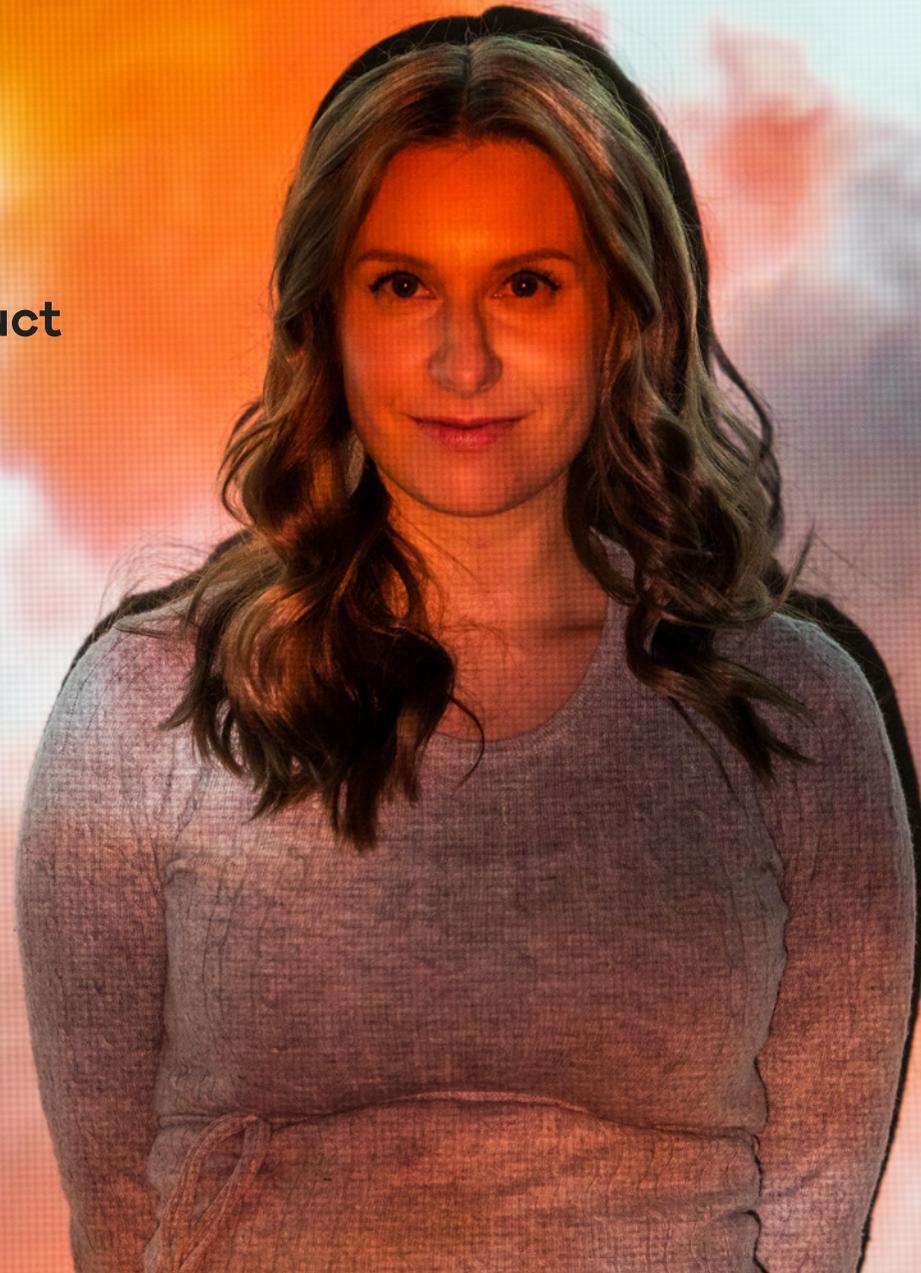




## Alma Media's Code of Conduct



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# Alma Media's Code of Conduct

This Code of Conduct, approved by the Board of Directors of Alma Media Corporation, 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 and principles issued by the Alma Media Group.



# 1. Alma Media employees

Alma Media's purpose is to act in ways that boost the sustainable growth of individuals, companies and society. Our digital services serve both consumers and professionals. As a media and service company, we support constructive social discussion and democracy, and offer experiences and insights. Our customers trust us due to our high-quality and relevant content, good service and user experience and reliable processing of customer data.

Everything we do is guided by our shared values: freedom and pluralism of journalism, teamwork, and courage.

Everyone at Alma Media has the duty to familiarize themselves with Alma Media's purpose and values and understand their impact and significance on both an individual level and with respect to the work community. In line with our values, we believe that building the future of our business requires an employee pool as diverse as possible.

We recruit new employees purely based on their competence and aptitude. Alma Media employees are entitled to receive fair and rewarding compensation, have opportunities to develop their skills and abilities, receive feedback, remain informed of company matters and work in a safe, pleasant, renewing and developing environment where everyone's privacy and private life are respected.

Everyone at Alma Media can contribute to making our work community inspiring, diverse and inclusive. Everyone at Alma Media must respect basic human rights. We do not condone discrimination based on age, gender, race, skin colour, nationality or ethnic origin, religious beliefs, convictions, family relationships, sexual orientation or disabilities. We have a zero-tolerance policy concerning sexual harassment and other forms of harassment, threats, offensive conduct, physical and psychological violence as well as bullying at work.



Alma Media Group is committed to ensuring that the employees' right to organise is observed at the workplace.

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.

Alma Media respects the UN Global Compact initiative, the Universal Declaration of Human

Rights and the ILO Declaration on Fundamental Principles and Rights at Work, and the Group also highlights these principles to its stakeholders.

## 2. Building unified Alma Media

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.
- We carefully look after our tangible and intangible property and remember that it is not our personal property.
- We handle confidential information and information pertaining to business plans carefully and refrain from disclosing any such information to anyone inside or outside the Group without authorized permission. We do not use the information we receive to pursue our personal interest.
- If our work involves handling 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.
- On social media, we observe the same principles concerning the confidentiality and accuracy of information as we do in our other communications.
- We make decisions based on Alma Media's interest and subject to appropriate risk assessments. We are committed to complying with the Group's legal and financial Group guidelines and approval practices.



## 3. Collaboration and partnerships

Successful business operations involve networking and partnerships between various parties. 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.

Alma Media requires its partners to respect all internationally recognised human rights. We do not condone the use of child labour, any form of forced labour, human trafficking or other violations of human rights in our supply chain.

We do not condone corruption or bribery of any kind in the private or 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 illegal payments or small bribes or benefits intended to speed up decisions by the authorities. We always comply with the guidelines issued by our partners and, where applicable, the authorities concerning the receiving of gifts and hospitality.

We respect intellectual property rights, copyright, patents, trademarks and confidential business information 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 media available to everyone. The principles of openness and interactivity guide our operations as members 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. We observe the best practices associated with the processing of personal data and information security as well as the applicable legislation of each country we operate in. We collect personal data only in the manner permitted by the law and subject to the orders issued by the authorities. We require our business partners to observe the same principles.

# 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.

We also require our subcontractors and other business partners to comply with the applicable laws and regulations in all respects.

All financial and non-financial information must be presented truthfully, transparently and in a timely manner in compliance with accounting legislation, local and international regulations and standards governing financial reporting and Alma Media's policies and guidelines.

We are committed to complying with anti-money laundering legislation and preventing tax evasion. We do not condone dishonest conduct in any form.

# 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, media 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.

Donations and sponsorships are approved in accordance with Alma Media Group's relevant policies and procedures. We do not give direct or indirect financial support to political parties, groups or individual politicians.

We take the environment into account in all our decisions and actions in order to minimise the environmental impact of our operations. We focus on reducing the environmental footprint of our value chain in accordance with best practices.

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 industry, such as the reliability of media content and digital services, environmental responsibility and promoting freedom of speech.



# 7. Commitment to Alma Media's Code of Conduct

Employees of Alma Media undertake to comply with this Code of Conduct and other Group policies which are relevant in their work.

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. The whistleblowing channel is also available to the Group's partners and other external parties.

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.

Alma Media's legal function receives the messages in the manner decided on by the Board of Directors and ensures that they are appropriately processed together with the

Whistleblow team that consists of the Group's General Counsel, Chief Financial Officer and Senior Vice President of Human Resources. Observations are reported regularly to the Audit Committee of the 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.

Violations of law, this Code of Conduct or Alma Media's policies have appropriate consequences, including the potential termination of employment. Failure to report knowledge of a violation, attempting to prevent a colleague from reporting a violation and reporting a false violation can also lead to consequences. All criminal offences are reported to the authorities.

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

14 December 2020

Kai Telanne  
President and CEO  
Alma Media Corporation