



# ALMA

## Accelerator of sustainable growth

Alma Media's Corporate  
Responsibility Report  
2018



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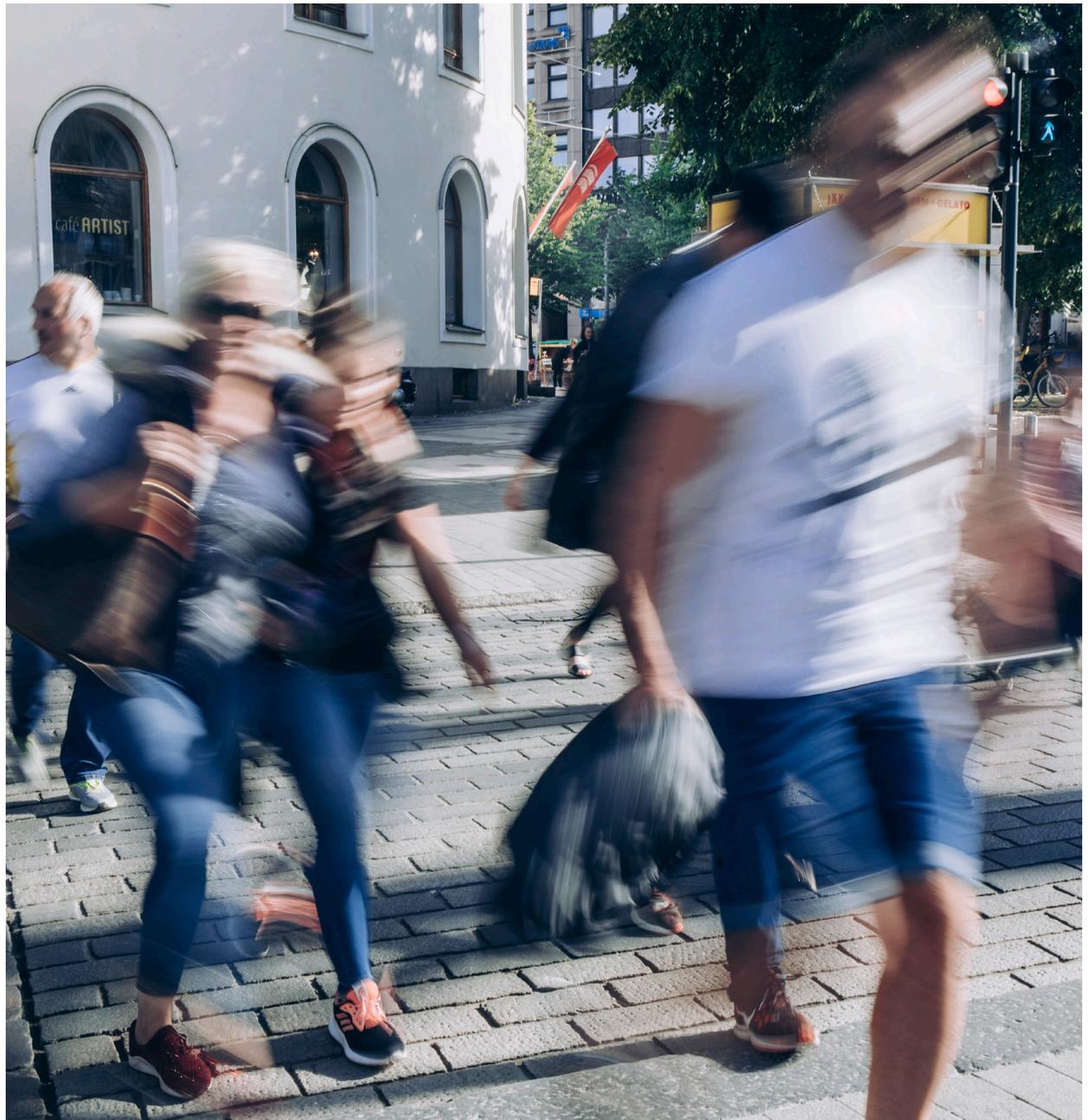
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# From the President and CEO

In a time when the prevailing themes of public discussion are antagonism, and societal divisions caused by pressure from extremist movements divide societies, the media plays an increasingly important role by providing high-quality content and services to promote pluralistic civic debate, societal transparency, economic activity and democracy.

How do we at Alma Media bear our responsibility? We have defined our mission as boosting the sustainable growth of individuals, companies and society. As a media company, the cornerstones of our responsibility are responsible journalism, responsible marketing and the responsible collection and processing of customer data. Our media brands are committed to operating responsibly, impartially and transparently. We want to be a leader in responsible marketing by providing consumers and advertisers with a reliable and safe advertising environment where advertising is easy to differentiate from news content and by ensuring that our processing of the customer data we collect is transparent and appropriate.

In 2018, our editorial teams focused on further developing journalistic quality by establishing a joint working group on responsible journalism and launching a joint reader survey to evaluate the quality and responsibility of content. In the development of responsible marketing and data protection, we focused our attention on implementing the changes required by the General Data Protection Regulation, which entered into force in May.

Climate change and the need for its mitigation have emerged as major topics in society. Our media brands are increasingly reporting on the impacts of climate change and presenting potential solutions for mitigating it. Changing course requires everyone to make a contribution. In 2018, Alma Media became the third media company in the world to publish ambitious science-based targets for reducing its carbon dioxide emissions.

Profitable business enables sustainable development. A robust financial position provides a commercial media brand with the necessary resources for producing high-quality content and services. Alma Media's profitability has now improved for four consecutive years. The uncompromising efforts of Alma Media employees in 10 European countries deserve credit for our strong profit performance. The recruitment and development of highly competent employees is one of our key future success factors. We are building a participatory company culture, investing in the quality of managerial work and emphasising diversity and a high standard of ethics in business. We are committed to supporting the universally accepted principles in the areas of human rights, labour, environment and anti-corruption laid out in the United Nations Global Compact initiative.

For high-quality independent media, business and responsibility go hand in hand and they require that we continuously evaluate and



develop our operations. The transformation of our operating environment is continuing and the competition we face is increasingly coming from international platform operators. I personally believe that us doing our jobs the right way will lead to growing appreciation for independent domestic media. The recent trends are encouraging in this respect, as a survey published by the Finnish Media Federation in 2018 showed that the

appreciation of domestic media in Finland is higher than it has ever been. This indicates that the societal significance of responsible media is now understood even better than before and there is a growing willingness to pay for high-quality content.

**Kai Telanne**  
President and CEO

# Materiality

Alma Media updated its materiality analysis in 2016. In addition to a comprehensive stakeholder survey, interviews and the Group's own strategy, the analysis was based on the identification of the industry's impacts and the business impacts.

The materiality matrix that was created has been subsequently refined by making changes to the names of the Group's responsibility themes, among other things.

Alma Media's material responsibility themes have been discussed by the Board of Directors and the Group Executive Team. They constitute the foundation of the Group's work and reporting on responsibility.

- Builder of sustainable society
- High-class service provider
- Reliable partner
- Responsible employee

	Material: financially significant in the short/ medium term	Strategic: significantly affects the capacity to implement the strategy in the medium/long term	Operational: significant for other reasons, but not material or strategic
Aspects that are unique to the media sector	<div style="display: flex; gap: 10px;"> <div style="background-color: #444; color: white; padding: 5px; text-align: center;">Responsible journalism</div> <div style="background-color: #800080; color: white; padding: 5px; text-align: center;">Responsible marketing</div> </div>		
Aspects that have particular consequences for the media sector	<div style="background-color: #800080; color: white; padding: 5px; text-align: center;">Information security and data protection</div>		<div style="background-color: #444; color: white; padding: 5px; text-align: center;">Social projects</div>
Aspects that are common to all industries	<div style="display: flex; gap: 10px;"> <div style="background-color: #C060C0; color: white; padding: 5px; text-align: center;">Transparency and ethics in business</div> <div style="background-color: #0056B3; color: white; padding: 5px; text-align: center;">Developing competence and well-being</div> </div>	<div style="display: flex; gap: 10px;"> <div style="background-color: #0056B3; color: white; padding: 5px; text-align: center;">Equal and diverse work community</div> <div style="background-color: #C060C0; color: white; padding: 5px; text-align: center;">Responsibility throughout the supply chain</div> </div>	<div style="background-color: #C060C0; color: white; padding: 5px; text-align: center;">Environmental impacts</div>

In reporting on corporate responsibility, Alma Media applies the principle of materiality by focusing on the aspects of corporate responsibility that the Group considers to be the most significant. As a media company, Alma Media's biggest impacts are related to the effects of published content and services on individuals and society as well as the responsible collection, processing and management of customer data. From the perspective of the continuity of the Group's business and maintaining its competitiveness, the most significant issues are the availability of competent and satisfied employees as well as ethical compliance in business operations.

In reporting on corporate responsibility, Alma Media adheres to the Global Reporting Initiative's GRI Standards where applicable, except in the area of responsible journalism, for which the sector-specific guidelines have not yet been updated. Alma Media reports on responsible journalism primarily in accordance with the GRI G4 reporting framework, which preceded the GRI Standards.

The table on the next page shows the aspect boundaries used in reporting and lists the GRI aspects included in Alma Media's corporate responsibility report. Any more detailed aspect boundaries pertaining to individual GRI aspects are indicated within the report in the section on the aspect in question.



Responsibility themes and areas	Responsibility promise	GRI aspects	Boundaries
<b>CONTRIBUTOR TO A SUSTAINABLE SOCIETY</b>			
Responsible journalism Social projects	We will strengthen our media outlets' reputation as the most trusted media brands and the number one brands in their respective areas and communities, and we will create long-term commitment among our customers.	<b>Responsible journalism:</b> Significant funding and other support received from non-governmental sources Actions and projects that guarantee adherence to responsible journalism Content accessibility Political support <b>Social projects:</b> Media skills	Alma Media's own operations (all media) Society Customers
<b>HIGH-QUALITY SERVICE PROVIDER</b>			
Responsible marketing Information security and data protection	We develop our offering with a long-term view in order to produce safe, accessible and easy-to-use services and to deliver a first-class customer experience for consumers and advertisers.	<b>Responsible marketing:</b> Incidents of non-compliance concerning marketing communications <b>Information security and data protection:</b> Substantiated complaints regarding breaches of customer privacy and losses of customer data	Alma Media's own operations Customers
<b>RELIABLE PARTNER</b>			
Transparency and ethics in business Responsibility throughout the supply chain Environmental impacts of operations	We develop the transparency and responsibility of our operations in dialogue with our stakeholders and by anticipating regulatory changes.	<b>Transparency and ethics in business:</b> Direct economic value generated and distributed Financial assistance received from government Corruption and anti-competitive behaviour Non-compliance with laws and regulations <b>Responsibility throughout the supply chain:</b> Supply chain <b>Environmental impacts of operations:</b> Materials Energy Emissions Waste Non-compliance with environmental laws and regulations	Alma Media's own operations Other indirect (Scope 3) GHG emissions Partners and the supply chain
<b>RESPONSIBLE EMPLOYER</b>			
Equal and diverse work community Developing competence and well-being	We will enhance Alma Media's employer image and develop the expertise of our employees in response to the competence needs created by the digital transformation.	<b>Equal and diverse work community:</b> Diversity of governance bodies and employees Non-discrimination <b>Developing competence and well-being:</b> Information on employees Hazard identification and risk assessment Regular performance reviews	Alma Media's own operations

# Management of corporate responsibility

In accordance with the purpose statement defined in 2016, Alma Media's purpose is to boost the sustainable growth of individuals, companies and society. In addition to Alma Media's purpose, its operations as a responsible media company are guided by its values, responsibility programme and the four UN Sustainable Development Goals that are the most closely linked to the Group's operations. They are: health and well-being (SDG 3), quality education (SDG 4), decent work and economic growth (SDG 8), and peace and justice (SDG 16, related to the media's role as a social institution).

## GENERAL MANAGEMENT PRINCIPLES

The objective of the development of responsibility is to support the implementation of the Alma Media's strategy and the sustainability of the Group's business as well as creating added value for stakeholders and society in a broader sense.

Alma Media's development of responsibility is guided by the following policies and guidelines, among others:

- Alma Media's Code of Conduct
- The corporate responsibility programme and its objectives
- Disclosure policy
- Information security policy
- Tax policy
- Investment and financing policy
- Procurement policy
- Equality and non-discrimination principles

and equality and diversity plans

- Career development principles
- Remuneration principles
- Contractual terms and terms of sale concerning the advertising customers of Alma Media's media sales
- The Board of Directors' diversity policy

In addition to its own policies and principles, the Group complies with the legislation that governs business activities and the media industry, adheres to certain guidelines by external parties and has made certain public commitments:

- The Council for Mass Media Guidelines for Journalists and basic agreement
- The marketing rules of the International Chamber of Commerce
- Principles concerning good marketing practices
- Europe-wide self-regulation of targeted online advertising (OBA self regulation)
- Guidelines by the IAB digital marketing network
- The Diversity Charter of the FIBS corporate responsibility network
- Alma Media's climate targets approved by the Science Based Targets initiative
- The UN Global Compact initiative and the UN Sustainable Development Goals

Alma Media's internal control, risk management and governance are described in more detail in the Corporate Governance Statement and the Report by the Board of Directors for 2018.

## MANAGEMENT OF RESPONSIBILITY AT ALMA MEDIA

The development of responsibility at Alma Media is led by the Group Executive Team, which lays down the strategic guidelines concerning corporate responsibility, monitors the implementation of the corporate responsibility programme and approves major corporate responsibility projects.

Alma Media's Board of Directors analyses the development of the Group's responsibility at least twice per year when reviewing corporate responsibility risks as part of the assessment of business risks and when approving the statement of non-financial information. Where necessary, the Board of Directors may also express views on the development of corporate responsibility strategy as part of its strategic planning.

The practical implementation of Alma Media's responsibility programme is led by Alma Media's Senior Vice President of Communications and Brand, assisted by Alma Media's Corporate Responsibility Manager and the Corporate Communications function. The Corporate Communications function and the Corporate Responsibility Manager support business units and functions in carrying out corporate responsibility projects and achieving sustainability targets.

The management of the various areas of corporate responsibility at the unit and

function levels is described in more detail below.

## CONTRIBUTOR TO A SUSTAINABLE SOCIETY

### MANAGING RESPONSIBLE JOURNALISM

In addition to the legislation governing the freedom of speech and expression and the media, the development of responsible journalism in Finnish media companies is guided by effective industry self-regulation.

The Guidelines for Journalists by the Council for Mass Media, which is the Finnish media sector's self-regulatory organisation, constitute the sector's ethical principles, which are in many ways stricter than the corresponding legislation. Media companies that operate responsibly have also authorised the Council for Mass Media to oversee their operations. The Council considers complaints regarding published media content, issues public reprimands to media that have violated the Guidelines for Journalists and, where necessary, amends the ethical guidelines it has drafted for the industry. Alma Media's editorial teams carefully monitor the Council's decisions and interpret them as precedents that guide operations.

In addition to Council for Mass Media decisions, editorial supervisors analyse the

national and international public dialogue regarding the media, reader feedback and the results of reader and brand surveys as part of the development of the Group's journalism. The goal is to ensure that, every day, Alma Media's media brands honour their position as mouthpieces for their communities and significant local, regional or national operators that support democratic society and pluralistic and constructive public dialogue through the content they publish.

Alma Media's media brands and other business units are politically independent. The Group's executive management is responsible for this. Editors-in-Chief and editorial supervisors are supported in the development of sustainable journalism by Alma Media's Working Group on Responsible Journalism.

### MANAGEMENT OF SOCIAL PROJECTS

In line with Alma Media's purpose, the Group's non-media services also strive to promote the activity, vitality and well-being of their respective regions as well as accelerate sustainable growth through various social projects. One key target group of the Group's social responsibility programme are young people, with a particular focus on media education. The goal is to enhance the skills young people need in working life and as members of our digitalising information society.

Alma Media's national social projects in Finland are coordinated by the Corporate Responsibility Manager, assisted by the Corporate Communications function. The Corporate Responsibility Manager and the Corporate Communications function also help

with regional projects as necessary. In the Group's foreign units, decisions on projects are usually made by business unit management.

### HIGH-QUALITY SERVICE PROVIDER

#### MANAGING DATA PROTECTION AND INFORMATION SECURITY

Alma Media strives to deliver an excellent customer experience for its various target groups by developing its services and offering with a long-term view.

Analysing the user data of the Group's services is an important tool in improving the customer experience. Alma Media uses data collected from various sources for many different purposes, including the development of targeted consumer content and services. The Group serves advertisers by providing them with reliable first-party or second-party data.

Alma Media actively monitors regulatory changes pertaining to data protection and information security and is committed to complying with all relevant provisions. The Group prioritises responsibility in the collection, use and administration of the user data accumulated through its services.

Alma Media's management monitors data protection and information security risks as part of the Group's ongoing risk management. The Group's legal department and ICT organisation are responsible for ensuring that Alma Media's services comply with data protection and information security recommendations and regulations as well as maintaining the appropriate level of

employee competence pertaining to data protection and information security.

### MANAGEMENT OF RESPONSIBLE MARKETING

The digital transformation and automation of advertising have introduced many new perspectives to the public dialogue regarding responsible marketing. In programmatic buying, advertising is bought through international digital platforms, which makes it difficult for advertisers to fully understand the roles of the various parties and the pricing of advertising. While automation and targeting make the digital advertising seen by consumers increasingly relevant, they have also led to growing concerns regarding the potential misuse of marketing data.

Alma Media is committed to developing its advertising solutions responsibly, in full compliance with the industry's self-regulation and the legislation governing marketing. The Group prevents problems that are occasionally associated with programmatic buying by auditing its advertising sales partners and sales channels and by selling the majority of its advertising inventory in closed auctions that can be entered only by approved buyers. The Group aims to systematically enhance the digital competence of its media sales organisation and develop its technological expertise to provide advertisers with a high-quality, competitive and safe advertising environment where advertising is monitored in real time.

The development of responsible marketing communications practices at Alma Media is the responsibility of the Group's media sales

and marketing organisation. In software procurement related to digital marketing, the media sales function is assisted by Alma Media's Chief Digital Officer and the rest of the ICT organisation.

### RELIABLE PARTNER

#### MANAGEMENT OF ENVIRONMENTAL RESPONSIBILITY

Alma Media's most significant greenhouse gas emissions arise from the printing and delivery of publications and the material purchases of the Group's printing facility. The Group's operations are not emissions intensive and environmental risks are not assessed to constitute significant risks for business operations.

Alma Media contributes to the mitigation of climate change by striving to systematically reduce its greenhouse gas emissions. During the reporting year, the Group set long-term science-based targets in accordance with the SBT initiative. According to the targets, the Group must reduce the greenhouse gas emissions arising from its consumption of electricity, district heating, district cooling and the fuel consumption of vehicles under the Group's control by 21 per cent by 2025 (using GHG emissions in 2016 as the baseline) as well as reduce its indirect emissions, related to activities such as procurement and business travel, by 10 per cent by 2023 (base year 2016). The achievement of these targets will be supported by measures such as purchasing zero-emission electricity, improving the energy efficiency of properties and the material efficiency of the printing facility as well as by optimising delivery transports. At

Alma Media's printing facility, the incentives of production employees are linked to the objective of improving material efficiency.

The development of environmental responsibility at Alma Media is managed by the Group Executive Team, which has approved Alma Media's science-based targets. Under the supervision of the Group Executive Team, the practical environmental measures are the responsibility of the business units' management, assisted by the Facility Manager, the printing facility's Quality Manager and the Chief Procurement Officer.

#### MANAGEMENT OF ETHICAL AND TRANSPARENT BUSINESS

Alma Media respects human rights and does not condone corruption and bribery. These principles are documented in Alma Media's Code of Conduct, which is the foundation of the Group's responsible business. The Group has a whistleblowing channel maintained by an external service provider to allow employees to anonymously report any suspected unethical business practices. Alma Media's whistleblowing team receives and processes the notifications and reports them to the Audit Committee of the Board of Directors.

As a media company, Alma Media must convince its stakeholders of the transparency of its operations and its independence of various stakeholder interests. The foundation for the Group's operations is a reputation as a credible, reliable and impartial source of information. In line with this principle, Alma Media does not support political parties or individuals. The Group's media brands are politically independent and they do not

receive press subsidies from the state. The Group's media sales organisation may grant discounts to candidates for election campaign advertising, but such discounts are offered to all parties and candidates on equal terms.

To convince its stakeholders of the responsibility and transparency of its operations, Alma Media also reports annually on its tax footprint and tax policy. The Group's executive management is responsible for the ethicality and transparency of Alma Media's business operations.

#### DEVELOPING RESPONSIBILITY THROUGHOUT THE SUPPLY CHAIN

Alma Media does not tolerate corruption, discrimination or bribery-related violations by its subcontractors, and requires its partners to adhere to the principles documented in its Code of Conduct. In order to manage the responsibility risks associated with procurement, Alma Media's country units make most of their purchases domestically or from nearby regions where businesses are supervised and regulated.

Alma Media also reserves the right to carry out inspections pertaining to production processes at suppliers' premises and the Group requires suppliers and service providers to provide documentation, where necessary, regarding the responsibility of the products and services produced. When the Group is about to sign a significant new subcontracting agreement, a visit is made to the production facility before choosing the supplier.

Purchasing agreements in Finland also include a section on responsibility for

subcontractors to confirm that they have familiarised themselves with Alma Media's corporate responsibility programme and Code of Conduct and agree to comply with their relevant principles. The section has been in a limited use until now, but will be used more widely from 2019 onwards.

The development of a responsible procurement policy and Group-level procurement in Alma Media's operations in Finland is the responsibility of the Chief Procurement Officer.

#### RESPONSIBLE EMPLOYER

##### EQUAL AND DIVERSE WORK COMMUNITY

In line with its Code of Conduct, Alma Media is committed to treating its employees equally and fairly. Employees are recruited based on their abilities and aptitude, irrespective of the applicant's gender, age, religious beliefs, nationality, sexual orientation or disabilities.

The Group's units in Finland update their non-discrimination, equality and diversity plans at two-year intervals. In drafting the plans, they utilise employee wage analyses and the results of Alma Media's employee survey, among other things. The plans were updated during the reporting period.

Every Alma Media employee has the right to report any observations of discrimination via the whistleblowing channel or by contacting an employee representative or the Group's HR function. Alma Media takes action in response to all reported incidents.

#### DEVELOPING EMPLOYEE COMPETENCE AND WELL-BEING

The goal of Alma Media's HR strategy is to support the Group's digital transformation by ensuring the sufficient availability of motivated and satisfied employees with the right competencies. Competence development at Alma Media is focused on agile methods for learning on the job. They provide opportunities for reacting quickly to changing competence needs. A key tool in this effort are the competence development plans of teams or individual employees, as they help make competence development a systematic process. The achievement of competence goals is monitored in one-to-one development discussions between supervisors and employees, for example.

With respect to the development of occupational safety, Alma Media focuses particularly on reducing occupational accidents among delivery employees, which mainly involve injuries due to slipping and stumbling. The unit takes a long-term approach to developing occupational safety through measures such as updating the induction training of delivery employees, improving safety equipment and analysing hazardous situations.

Alma Media's HR management is in charge of developing employee competence and well-being as well as equality and diversity. The HR management defines, steers and prioritises processes and functions related to employee compensation, benefits, HR reporting and competence development.

# Stakeholder interaction

Stakeholder interaction constitutes the foundation of Alma Media’s business and is a central aspect of the company’s day-to-day operations.

	Topics	Channels and Alma Media’s response
Readers and online users, consumers	Responsible journalism, reliability and quality of media content Data protection and information security Supporting pluralism in society and democratic development	Long-term multi-channel development of content and services, technology purchases, responsible data management, developing employee competence, customer contacts and feedback, customer and reader satisfaction surveys, social media, events, making editorial work more transparent
Advertisers, corporate customers	High-quality and secure advertising environment, service reliability, monitoring and management of advertising in the digital operating environment Data protection and information security, advertisement visibility and brand safety	Long-term service development, technology purchases, developing employee competence, customer contacts and feedback, training and events for advertisers, Alma Talk events
Investors, shareholders, analysts	Building sustainable business growth by leveraging the opportunities presented by the digital transformation Market environment and competitive landscape, objectives, reporting, strategy and financial position	Regular and ongoing disclosure obligations including interim reports, financial statements bulletin, report by the Board of Directors and financial statements, Corporate Governance Statement and stock exchange releases. General Meeting of Shareholders, investor, analyst and media meetings and events, the Alma Media website, Carbon Disclosure Project, Alma Media’s science based climate targets
Employees	Competence development and work ability, occupational well-being and safety, target setting, ethical guidelines and issues, security, values and business practices, increasing trust, workers’ rights, equal and fair work community	Training and one-to-one discussions between managers and subordinates, team meetings, employee surveys, equality, diversity and non-discrimination plans, Intranet, internal blogs, Yammer, employee events, occupational health care, discussions with employee organisations, management forums
Service producers	Fair and equal treatment, supplier requirements, Alma Media’s Code of Conduct, Alma Media’s procurement policy, cooperation to reduce emissions and environmental impacts	Mutual sharing of knowledge and expertise, memberships in organisations, partnerships and projects.
Associations	Cooperation, mutual sharing of knowledge and expertise	Memberships, partnerships and projects, communication, seminars and other events
Media	High-quality journalism and responsible marketing High-quality data and information security Openness, transparency, actively providing information, accuracy of content, quick response to enquiries	Observing the Guidelines for Journalists, interviews and releases, surveys published by Alma Media, key publications, seminars, social media channels
Society and the authorities	Regulatory compliance, supporting local wellbeing as well as a pluralistic and democratic society	Reporting, high-quality and reliable content and services, Alma Media’s Code of Conduct, key corporate responsibility principles

## ADVOCACY AND MEMBERSHIPS

Alma Media manages its stakeholder relationships by being actively involved in associations and cooperative bodies. The goal is to survey changes in Alma Media’s industry and in relation to corporate responsibility.

As part of the development of its corporate responsibility and advocacy work, Alma Media is member of organisations such as the Confederation of Finnish Industries (EK), the Central Chamber of Commerce, the Finnish Media Federation, IAB Finland, an association that promotes the growth and development of digital marketing and advertising, the Finnish Business and

Society (FIBS) corporate responsibility network and the FIBS diversity network, the City of Helsinki Climate Partners network and the Responsible Media Forum.

In addition to these, many members of Alma Media’s Management Team and managers and experts hold board memberships in the Media Industry Research Foundation of Finland, Finnish Media Federation, Media Metrics Finland as well as IAB Finland. Alma Media is also a key partner of the Helsinki-based Amos Rex art museum for the period 2018-2020 and continues its partnership with the Finnish Children and Youth Foundation (the period 2019-2021).



Contributor to sustainable  
development



# Responsible journalism

Alma Media maintains the responsibility of journalism through ethical operating models and a responsible editorial culture.

Editorial supervisors actively give journalists guidance and feedback in their work. They also cooperate and exchange information across brands.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

Alma Media's media brands first set shared goals for the development of responsible journalism in Alma Media in 2017. The first goal was that Alma Media's media brands' combined share of the condemnatory decisions issued by the Council for Mass Media should be under 20 per cent of the total condemnatory decisions issued in any given year.

This goal was achieved in the year under review. The Council for Mass Media issued 63 decisions in 2018, with a condemnatory decision issued in 23 of these cases. Alma Media's media brands' combined share of the condemnatory decisions was 17 per cent (four condemnatory decisions). The condemnatory decisions were given for two of Alma Media's media brands due to insufficient source criticism and inaccurate reporting. The cases in question have been analysed by the editorial teams to prevent the recurrence of the mistakes.

In 2018, Alma Media's media brands also achieved another goal set two years previously. The goal was that the Group's major media brands should, by the end of 2018, introduce a joint regular reader survey to evaluate the quality and responsibility of the content they produce. The first round of the survey was conducted in January 2019 and it will be repeated twice a year from now on.

According to a new goal set in 2018, each of the media brands participating in the joint reader survey must come up with their own KPI target by 2021 to measure the responsibility of their content based on the results of the survey.

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

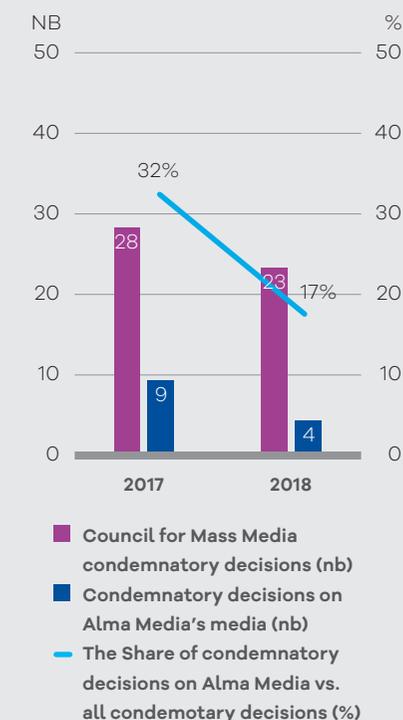
Alma Media's media brands aim to increase the transparency of their journalistic processes. All of the Group's media brands have made a commitment to publishing their journalistic principles on their respective websites in 2019. In addition, the Working Group on Responsible Journalism has been tasked with exploring opportunities for introducing new elements in the Group's

media brands to increase the transparency of journalistic process.

A second jointly agreed project of the Working Group on Responsible Journalism for 2019 is to explore the technical and other opportunities for increasing the quantity of high-quality and appropriate online discussion in connection with content published by the Group's media brands.

Alma Media's editorial teams will also carry out a joint project related to ethical and responsible journalistic practices by preparing for the growing phenomenon of journalists being targeted by attempts to pressure them, influence them by information and obtain information by intrusive means. This will be achieved by organising coaching for interested journalists.

**Council for mass media condemnatory decisions in Finland 2017–2018**



### OTHER ACTIONS TAKEN IN THE DEVELOPMENT OF RESPONSIBLE JOURNALISM IN 2018

- Alma Media’s media brands established a joint Working Group on Responsible Journalism. The working group is tasked with preparing and implementing Alma Media’s editorial teams’ joint responsibility projects in accordance with a jointly defined action plan.
- Alma Media’s editorial offices established a joint fact checking team in late 2017 to evaluate the truthfulness of claims made by the candidates in the Finnish presidential elections of 2018.

### ASPECTS OF GRI STANDARDS AND THE GRI G4 FRAMEWORK RELATED TO RESPONSIBLE JOURNALISM

Alma Media reports on aspects related to responsible journalism partly by using the GRI G4 reporting framework which preceded the GRI Standards. The Global Reporting Initiative has not yet updated its media sector-specific aspects to match the new GRI Standards.

#### G4-M1 SIGNIFICANT FUNDING AND OTHER SUPPORT RECEIVED FROM NON-GOVERNMENTAL SOURCES

Alma Media’s media brands are impartial and they do not receive any funding from parties that would compromise their independence.

During the reporting year, Alma Media Kustannus received EUR 170,000 from Google for a project to develop smart notifications. The Åkerlund Foundation provided Alma Media with a grant of EUR 20,000 to fund a research project focused on young people’s relationship with media and their media consumption. The final phase of the project was implemented in January 2019.

Financial support was also received for a modernisation project to enhance the energy efficiency of Alma Media’s old printing facility. The innovation funding agency Business Finland granted funding of EUR 117,023 for the project.

Alma Media’s business units outside Finland did not receive any funding from private sources during the year.

#### 201-4 FINANCIAL ASSISTANCE RECEIVED FROM GOVERNMENT

Alma Media’s media brands or other units did not receive any funding from governmental sources during the year.

#### G4-M2 METHODOLOGY FOR ASSESSING AND MONITORING ADHERENCE TO CONTENT CREATION VALUES

##### The reporting covers Alma Media’s media brands.

Alma Media’s media brands are committed to compliance with good journalistic practices and the decisions made by the Council for Mass Media. The Guidelines for Journalists impose substantially stricter ethical standards on media outlets than the legislation governing the media industry. The topics covered in the Guidelines for Journalists

include the journalist’s professional position and independence, the principles of obtaining information and the rights of interviewees. The Guidelines also stipulate how media outlets need to separate journalism from advertising and rectify any errors they make.

The Council for Mass Media is authorised to issue reprimands to media outlets that have violated good journalistic practices. The Council reviews complaints 10–11 times per year. Anyone can report a complaint to the Council.

In addition to the Guidelines for Journalists, Alma Media’s editorial offices have their own style books that cover topics related to the media brand and responsible journalism. The editorial offices also have separate guidelines related to, for example, fact checking and the use of social media.

In Alma Media’s editorial teams, ethical guidelines are complemented by active supervision and management as well as continuous oral and written feedback from supervisors to subordinates.

#### G4-M3 ACTIONS TAKEN TO IMPROVE ADHERENCE TO CONTENT CREATION VALUES, AND RESULTS OBTAINED

##### Reporting boundaries: The reporting covers Alma Media’s media brands.

The self-regulation of the media industry is effective in Finland and it requires Finnish media companies to have a responsible operating culture. In the manner described above (G4-M2), the Council for Mass Media supervises compliance with the media sector’s ethical operating principles and

issues reprimands to media outlets if it finds that they have violated editorial ethics.

Alma Media’s media brands also take measures of their own aimed at the long-term development of a responsible and transparent editorial culture. During the reporting year, the two most significant joint projects by the Group’s media brands aimed at developing responsibility in journalism were the introduction of a regular reader survey by the Group’s major media brands and the creation of a joint fact checking team. These projects are described in the information box on this page.

#### G4-M4 CONTENT ACCESSIBILITY, PROTECTION OF VULNERABLE AUDIENCES AND INFORMED DECISION-MAKING

##### Reporting boundaries: The reporting covers Alma Media’s media brands.

In accordance with the guidelines by the Council for Mass Media, the Group’s media brands visibly differentiate between advertising and journalistic content and they do not target audiences under 18 years of age with advertising. The editorial teams publish material on their pages that could potentially upset sensitive audiences, such as children and young people, only in exceptional cases when doing so is justified from a journalistic perspective, and readers are given appropriate advance warnings in such cases. Alma Media has also implemented restrictions and policies regarding what types of advertising are allowed on its websites in order to ensure a safe and pleasant advertising environment for advertisers and consumers alike. In the manner described above (G4-M2),

the Council for Mass Media supervises compliance with the media sector's ethical operating principles and issues reprimands to media outlets if it finds that they have violated editorial ethics.

#### 415-1 POLITICAL CONTRIBUTIONS

Alma Media does not give support to, or receive support from, political parties or individuals. The Group advocates for the interests of commercial media companies primarily through a small number of key advocacy organisations, namely the Finnish Media Federation, the Finnish Newspapers Association, the Confederation of Finnish Industries and the Central Chamber of Commerce.

To ensure journalistic integrity, Alma Media's media brands are politically independent and they do not receive press subsidies from the state.



# Social projects

Alma Media's purpose is to accelerate sustainable growth among its stakeholders and in society at large.

Alma Media's units are active participants in their respective communities and they realise their social responsibility each year by organising local, regional or national events and projects that support sustainable social, ecological or economic growth.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

Alma Media has set three targets by which it evaluates its performance in the area of social projects. The first target is that the Group must carry out at least one national-level social project or media education project in Finland each year. This target was achieved in 2018. Alma Media challenged its employees and readers as well as other companies in Finland to commit to climate promises aimed at mitigating the impacts of climate change. The campaign utilised internal and external communications and advertising in the Group's media brands and newsletters, and it also included a campaign offer to encourage advertisers to publish responsibility-related advertising.

The second target has been set for the Corporate Communications function, which manages Alma Media's national-level social partnerships and related projects in Finland. The target is that the Corporate

Communications function must allocate at least 300 person-hours per year to the coordination and planning of social projects. This target was achieved in 2018.

The third target, which extends until 2020, is that Alma Media's employees must make at least 50 media education visits to schools each year. This target was achieved. The topic is reported in G4-M7.

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

In 2019, as in previous years, Alma Media sought to increase the impact of its social and media education projects by improving communication and cooperation between the Group's units, by applying an increasingly planned and systematic approach to project selection and implementation as well as by developing project communications. The key themes of the projects carried out in Finland in 2018 were media education (school visits), literacy (the media sector's national READ project) and future-oriented skills (Future of Work event in spring 2019 as part of Alma Media's three-year role as the main partner of the Amos Rex art museum).

## ASPECTS OF SOCIAL RESPONSIBILITY ACCORDING TO THE GRI G4 REPORTING FRAMEWORK

### G4-M7: ACTIONS TAKEN TO EMPOWER AUDIENCES THROUGH MEDIA LITERACY SKILLS DEVELOPMENT

**Reporting boundaries: The reporting covers Alma Media's media brands.**

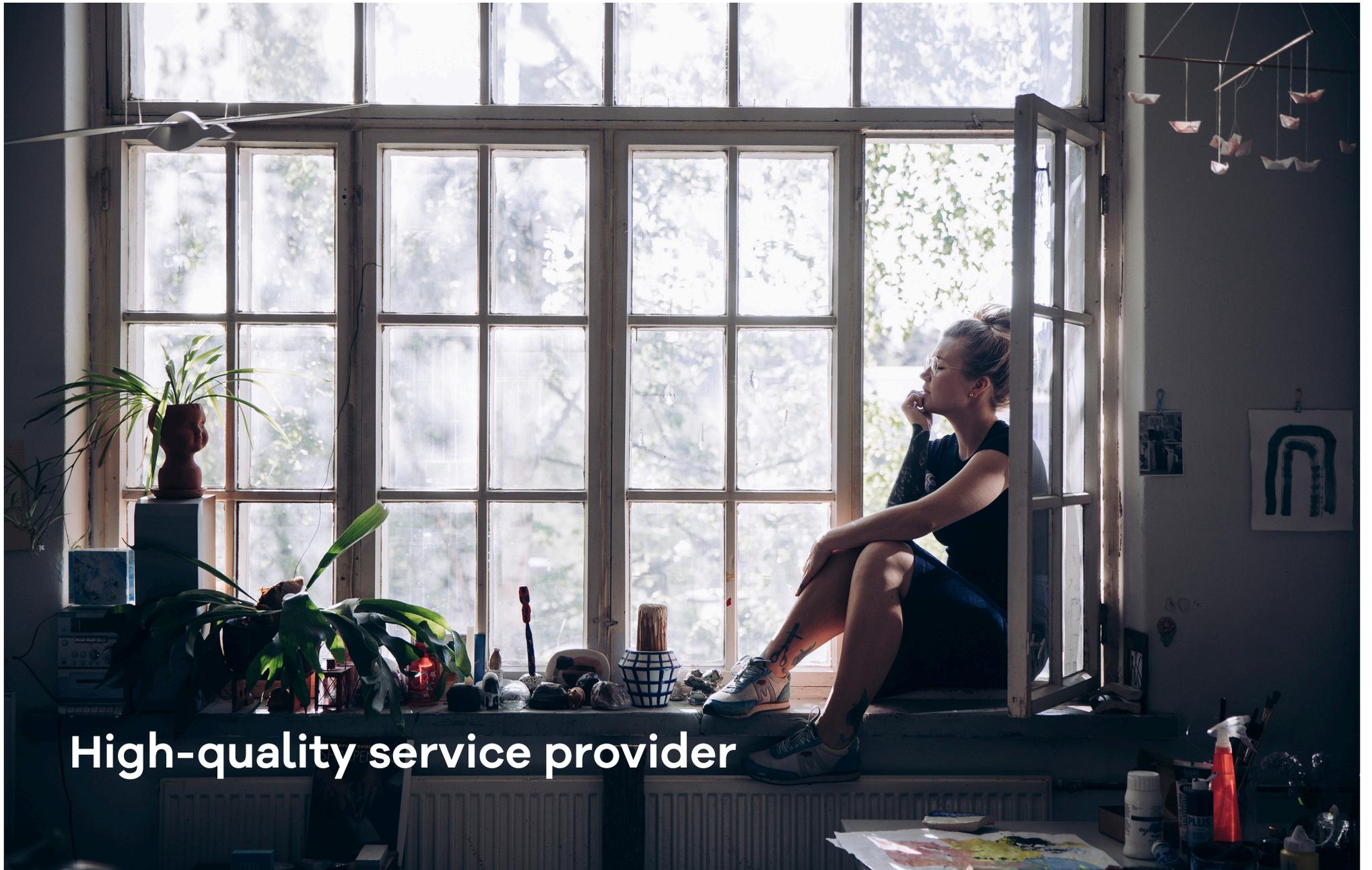
Alma Media has selected young people as the primary target audience of its media literacy projects, as their media consumption and reading habits are still developing. In 2019, the Group's employees taught approximately 100 media education classes to school classes, reaching more than 2,000 children and young people. Alma Media's media brands distributed some 90,000 free newspapers to schools during Newspaper Week and made their paid online services available to school classes. Aamulehti offered all sixth-graders in the Pirkanmaa region the opportunity to learn about journalistic work at the Aamulehti activity station at the Pirkanmaa Me & MyCity miniature city.

In addition to these activities, the Alma Consumer unit's media brands also jointly maintain the Koulumaailma (School World) website to provide free media education content for teachers to use in their lessons.

#### OTHER SOCIAL RESPONSIBILITY PROJECTS IN 2018

- Financial support for NGOs: Alma Media's recruitment service companies in the Czech Republic and Slovakia offered NGOs use of their recruitment services free of charge or for a nominal fee of one euro. The computational value of this initiative was approximately EUR 4.4 million, with more than 5,000 permanent jobs filled. Direct donations to NGOs by Alma Media's units during the reporting year totalled approximately EUR 90,000, in addition to which the Profesia recruitment service company in Slovakia allocated two per cent (roughly EUR 22,000) of its corporate taxes to NGOs.
- Other support for the third and public sectors: Profesia offered Slovakian schools free use of its recruitment portal, which focuses on jobs in education. The computational value of this support was about EUR 350,000 during the year. Schools published some 4,500 job advertisements on Profesia. The Group's units were also involved in many local or regional cooperation projects with NGOs, with examples in Finland including the Cancer Foundation.
- Support for children and young people: Alma Talent's media brands collaborated with the communications agency Miltton in the summer to organise Naantali 24h, a social discussion event that brought together policymakers and young people. Alma Media, the Finnish Children and Youth Foundation and the City of Helsinki's Luotsi youth work programme joined forces in autumn 2018 to organise an art workshop for young people who are experiencing difficult circumstances in life.





**High-quality service provider**

# Information security and data protection

User data has become a strategic cornerstone of Alma Media's business.

Services and systems are developed responsibly, in compliance with current regulations governing information security and data protection and with a proactive approach towards new information security threats.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

Alma Media uses two performance indicators to report on the development of its responsibility with regard to information security and data protection. The Group has set a goal of not having any serious information security breaches during any reporting period (one year) and not receiving any reprimands from the authorities regarding breaches of information security or data protection. Alma Media was not made aware of any such incidents in 2018.

The second goal related to information security and data protection is that the Group will regularly organise information security and data protection training for its employees in Finland. In 2018, the target was to organise two data protection training events for all of the Group's employees in Finland and four data protection training events for new

recruits. This target was not achieved, as the Group only organised three data protection training events aimed at newly recruited employees. Starting from 2019, the annual target is to organise four data protection training events open to all employees in Finland and two training events on information security. The Group's assessment is that its employees have achieved a sufficient level of competence regarding the changes to business operations introduced by the entry into force of the EU General Data Protection Regulation (GDPR) in 2018. In the future, training will focus on maintaining and developing its employees' information security and data protection competence.

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

In 2019, Alma Media will enhance consent management in its digital services, aiming to improve customers' ability to choose how and for what purposes their data can be used. This will coincide with the continued development of data protection, with focus areas such as the collection of data through online services.

With respect to information security, Alma Media will increase its resources in 2019 to improve its reactive capabilities and commission an information security assessment by an external partner for certain services selected by the Group. Internal resources will also be allocated to conduct needs-based information security checks on services.

## GRI ASPECTS RELATED TO INFORMATION SECURITY AND DATA PROTECTION

### 418-1 SUBSTANTIATED COMPLAINTS REGARDING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA

The Group was not made aware of any serious violations related to information security, data protection or privacy during the reporting period, and the Group was not subject to any reprimands by the authorities.

## OTHER ACTIONS TAKEN TO DEVELOP INFORMATION SECURITY AND DATA PROTECTION IN 2018

- Actions related to the GDPR: A new data protection description was drafted for Alma Media, the file descriptions of the Group's services were updated to ensure GDPR compliance and new data protection tools were adopted
- Development of information security: A project to improve the Group's detection of, and response to, information security threats, a project to improve the management of employees' user access

# Responsible marketing

Alma Media's operating principle is to only work with responsible advertisers.

Operating responsibly in global digital advertising networks requires the Group to invest in the development of technology and employee competence.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

Alma Media has set two targets for the development of responsible marketing. The first target is that Alma Media's online and mobile services should feature no advertisements (zero per year) that violate the International Chamber of Commerce's Code of Advertising and Marketing Communication Practice. In 2018, Alma Media's services did not receive reprimands in their operating countries from the organisations that monitor the responsibility of advertising. Nevertheless, Alma Media's advertising management function did remove a small number of programmatically bought advertisements from the Group's services in Finland due to non-compliance with the Group's policies and guidelines.

The other target related to the responsibility of marketing is that, by 2020, Alma Media's media sales organisation will be ranked among the leaders of its industry in Finland in terms of its index average in the annual survey of the customer experience of media

sales organisations. Alma Media's media sales organisation achieved its target in 2018. The media sales function will continue to develop its operations in order to further improve the customer experience.

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

As a major national media company, Alma Media wants to be on the leading edge of the development of responsible marketing in Finland. In 2019, Alma Media will strive to find new ways of monitoring the responsibility of its advertising in the often global and highly automated digital advertising value chain. The goal is to set a measurable target on which the Group will report going forward.

Alma Media's media sales and marketing organisation will continue its active responsibility dialogue with other players in the marketing communications industry in 2019. Examples of this dialogue include the IAB digital marketing and advertising network, being a media partner of the Agency of the Year competition, organising customer events and going on rounds of media agencies with the theme being the impact of the technical quality of advertising on the customer experience.

The single most significant change affecting the development of advertising from the perspective of technological progress is the renevation of consumer consent management, which is described on page 18. Supplier relationships will be developed by incorporating the contractual appendix that contains Alma Media's responsibility principles into supplier agreements in the field of marketing communications. The appendix in question has previously only been used in the printing facility's subcontracting agreements.

## GRI ASPECTS RELATED TO RESPONSIBLE MARKETING

### 417-3 INCIDENTS OF NON-COMPLIANCE WITH REGULATIONS AND/OR VOLUNTARY CODES CONCERNING MARKETING COMMUNICATIONS

There were no incidents of advertising contrary to good practices in Alma Media's services during the year that would have led to a fine, penalty or reprimand from the authorities or the marketing communication industry's self-regulatory bodies.

## OTHER ACTIONS TAKEN IN THE DEVELOPMENT OF MARKETING IN 2018

- Actions related to the GDPR: Alma Media deployed a new customer data management platform in the Group's services in Finland. The new platform clarified the overall data management architecture and ensured that the data collected from advertisements displayed on the Group's websites is processed in compliance with the GDPR. The partnership agreements with media agencies were updated in compliance with the provisions of the GDPR and intensive data protection training was provided for media sales representatives.
- Active communication and dissemination of information in events aimed at media agencies and advertisers, the key themes of responsible marketing were to increase understanding of the digital advertising purchasing path and pricing in programmatic buying, the significance of the technical quality of advertising to the consumer experience and leveraging responsibility in brand building.



Reliable  
partner





# Transparency and ethics in business

Alma Media operates sustainably and expects the same from its partners and suppliers.

The key principles of responsibility for employees are also documented in Alma Media's Code of Conduct.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

Alma Media has a zero tolerance policy with respect to bribery, corruption and other unethical business practices. Performance in this respect is measured by monitoring whether the Group is informed of any infringements related to unethical business practices by the authorities, by external parties or via the anonymous whistleblowing channel made available to employees. No Group was not made aware of any such incidents during the year.

## ALMA MEDIA'S TAX FOOTPRINT IN 2018

Alma Media operates openly and transparently with respect to taxation. The Group pays taxes in the country where the result is generated and complies with the valid legislation, regulations and international transfer pricing guidelines.

The corporate income tax rates in Alma Media's operating countries vary from 15 per cent in Latvia and Lithuania to 22 per cent in Sweden.

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

Alma Media's long-term objective is for all employees to complete a course of induction training materials related to the Code of Conduct. The goal for 2019 is to develop the operating model to have a larger proportion of existing employees complete the training.

## OTHER ACTIONS RELATED TO THE DEVELOPMENT OF TRANSPARENT AND ETHICAL BUSINESS IN 2018

- The digital induction materials related to Alma Media's Code of Conduct were introduced in all of the Group's operating countries and incorporated into the induction training of new employees.
- Alma Media developed its tax footprint reporting by adding more detail to the reported information.

Collected and Paid Taxes	Finland	Czech Republic	Slovakia	Baltic countries	Other countries	Total
Corporate income tax	8.5	3.9	1.2	0.5	0.5	14.2
The effective tax rate	20.3%	19.6%	21.9%	14.6%	18.1%	20.6%
Employer contributions	0.8	3.0	0.6	0.3	0.3	6.4
Other paid taxes	0.3	1.5	0.0	0.0	0.0	2.1
Paid taxes total	9.6	8.5	1.8	0.1	0.8	22.7
Net VAT	27.3	7.1	1.9	1.0	1.3	38.2
Employer taxes	23.7	0.0	0.4	0.6	0.5	26.5
Other collected taxes	0.0	0.0	0.0	0.0	0.0	0.0
Collected taxes total	51.0	7.1	2.3	1.6	1.9	64.7
Collected and paid taxes total	60.6	15.5	4.0	2.4	2.7	87.4

**GRI ASPECTS RELATED TO TRANSPARENT AND ETHICAL BUSINESS**

**CONFIRMED INCIDENTS OF CORRUPTION AND ACTIONS TAKEN: 205-3**

**LEGAL ACTIONS FOR ANTI-COMPETITIVE BEHAVIOUR, ANTI-TRUST AND MONOPOLY PRACTICES: 206-1**

There were no incidents of corruption or anti-competitive behaviour at Alma Media in 2018, and there are no investigations related to bribery, corruption, or anti-competitive behaviour by the authorities in progress.

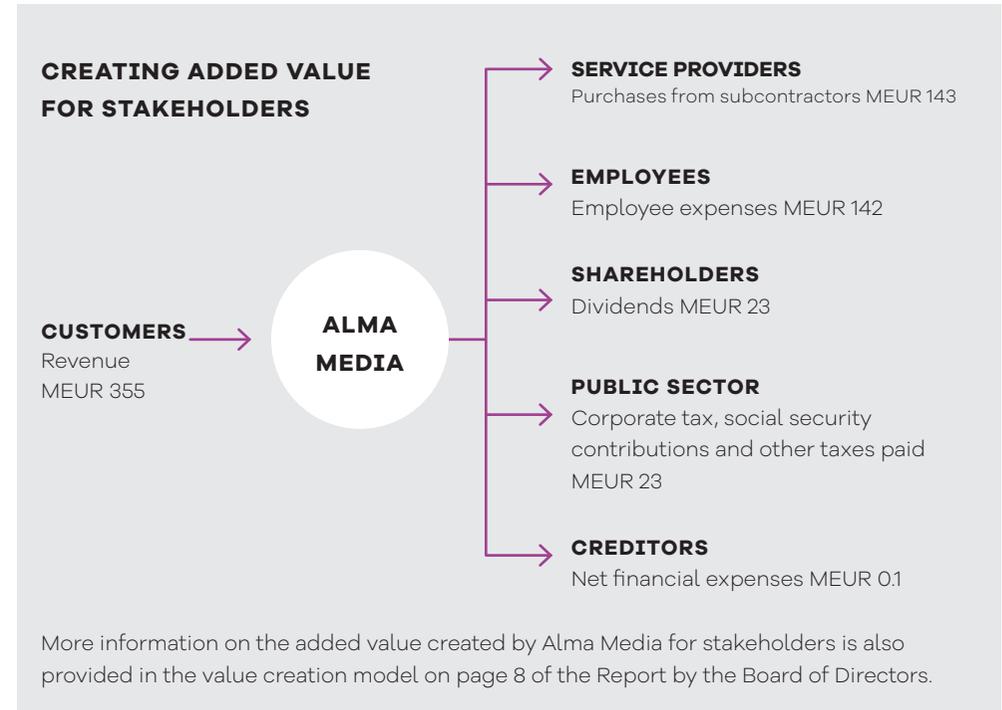
**NON-COMPLIANCE WITH LAWS AND REGULATIONS IN THE SOCIAL AND ECONOMIC AREA: 419-1**

Alma Media was not subject to any rulings or reprimands by the authorities pertaining to non-compliance with laws and regulations governing social and economic responsibility.

**DIRECT ECONOMIC VALUE GENERATED AND DISTRIBUTED: 201-1**

Alma Media builds sustainable growth for its stakeholders in line with the Group's strategy, by making use of the opportunities presented by the digital transformation. Alma Media's services are the leading services in their segments in many of the Group's countries of operation. They generate economic activity in their communities through employment, the payment of taxes and the procurement of products and services from other companies.

The chart beside presents key information on the added value created by Alma Media for its stakeholders. The chart does not include financial support received by Alma Media from public or private sources, such as foundations. Such financial support constitutes a very small proportion of the company's income streams. The funding and support received by the Group in 2018 is described on page 13 (G4-M1). Alma Media did not receive any funding from governmental sources during the year.



# Responsibility throughout the supply chain

Alma Media's subcontracting activities are guided by legislation as well as the Group's Code of Conduct and corporate responsibility programme.

The Code of Conduct and the corporate responsibility programme require the Group's subcontractors to operate ethically and in compliance with the law.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

In 2018, Alma Media became the third media company in the world to set long-term science-based climate targets (SBT). One of the two targets set concerns Alma Media's indirect Scope 3 emissions arising from, amongst other things, subcontracting. The target calls for the Group to reduce its Scope 3 emissions by 10 per cent by 2023, using 2016 as the baseline.

To achieve this target, Alma Media has carefully analysed the major sources of greenhouse gas emissions in its supply chain. Based on the analysis, the Group's efforts to reduce emissions will be particularly focused on the subcontracting activities of Alma Media's printing facility by reducing material waste, as well as the Group's distribution

operations; for example, by optimising delivery routes. Alma Media also aims to engage in active dialogue on responsibility with the Group's key material suppliers and transport service providers in order to achieve the science-based target.

In 2018, Alma Media's Scope 3 GHG emissions were 46,131 CO<sub>2</sub>-eq tonnes. Compared to 2016, the emissions decreased by seven per cent. Reductions in emissions were achieved through a lower level of purchases of paper and transport services. This decrease was particularly attributable to a divestment that saw the Group sell the Lapin Kansa newspaper, its two town papers in the Lapland region and its delivery operations in Lapland to the media company Kaleva.

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

Alma Media aims to develop the calculation of the greenhouse gas emissions caused by its distribution operations in 2019 by

producing more detailed route-specific data. Analysing emissions from distribution operations supports the long-term management of emissions. The Euro emissions classification of vehicles will be incorporated as a new criterion into Alma Media's competitive tendering processes concerning distribution services this year.

Alma Media's printing facility will enhance its dialogue with key material suppliers to assess the climate emissions caused by the production of raw materials and opportunities to reduce them. The Group also aims to continue discussions with its key suppliers of printing and transport services to explore opportunities for the collaborative reduction of climate emissions.

## OTHER ACTIONS TO DEVELOP RESPONSIBILITY THROUGHOUT THE SUPPLY CHAIN IN 2018

- Alma Media drafted a corporate responsibility section to be incorporated into its subcontracting agreements in Finland that presents the Group's corporate responsibility programme and Code of Conduct. In the section the subcontractors are urged to adhere to the principles they contain. The section was incorporated into all of the printing facility's subcontracting agreements in 2018. The Group intends to expand its use in 2019.
- Alma Media enhanced its responsibility dialogue with certain key suppliers, encouraging them to analyse their greenhouse gas emissions and draft an emissions reduction plan.

## GRI ASPECTS RELATED TO THE RESPONSIBILITY OF THE SUPPLY CHAIN

### SUPPLY CHAIN: 102-9

**Reporting boundaries:** A more detailed description of the supply chain has only been possible for the Group's operations in Finland.

Alma Media's supply chain consists of thousands of companies, the smallest of which are microenterprises in the field of content production. The procurement function in Finland uses a two-tier model: some purchases are made on a centralised basis and some are made locally. For example, regional and local media decide on their purchases of content production services independently, as purchasing locally relevant content requires the purchasers and sellers to have a high degree of local knowledge.

During the year under review, Alma Media's country units purchased services and products for a combined total of MEUR 143. The purchases made in Alma Media's Finnish operations were spread out among nearly 3,700 subcontractors. Of these, 46 were major companies defined as key subcontractors by the Group. They also included the Group's most significant suppliers of distribution, printing and ICT services. The other extreme in the supply chain was represented by sole proprietorships established by photographers or journalists, for example. They accounted for more than a quarter of the Group's subcontractors in Finland.



# Environmental impacts of operations

The most significant greenhouse gas emissions arising from Alma Media’s operations are caused by printing and distribution activities as well as the consumption of electricity, district heating and district cooling at the Group’s properties.

The Group takes a proactive approach to reducing its greenhouse gas emissions. This requires a long-term emissions reduction plan as well as the systematic analysis and development of the Group’s operations.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

Alma Media’s long-term environmental objectives are to improve the energy efficiency of its properties, decrease material waste at its printing facility and reduce the Group’s greenhouse gas emissions.

The goal for the printing facility is to improve material efficiency by two per cent per year during the period from 2016 to 2025. The printing facility’s material efficiency improved by eight per cent year on year in 2018.

Alma Media’s goal is for its properties in Finland to begin using zero-emission electricity by the end of 2020. In line with the Group’s plans, the first properties to make the transition to zero-emission electricity were the Alma Media head office in Helsinki and

the printing facility in Tampere. Purchases of zero-emission energy will be expanded in 2019 and 2020.

In addition to purchasing zero-emission energy, Alma Media will reduce the greenhouse gas emissions caused by its property portfolio by improving its energy efficiency. The target for the Group’s properties in Finland is to improve energy efficiency by five per cent by the end of 2020, using 2016 as the baseline.

In July 2018, Alma Media sold its old printing facility in Tampere, which had been leased to external parties in recent years. The impact of the property on the overall energy efficiency of the Group’s properties in Finland was so significant that its removal from the property portfolio substantially improved Alma Media’s energy efficiency figures as reported on page 24.

The sale of the property had a similar effect on Alma Media’s Scope 2 emissions, the reduction of which was one of the

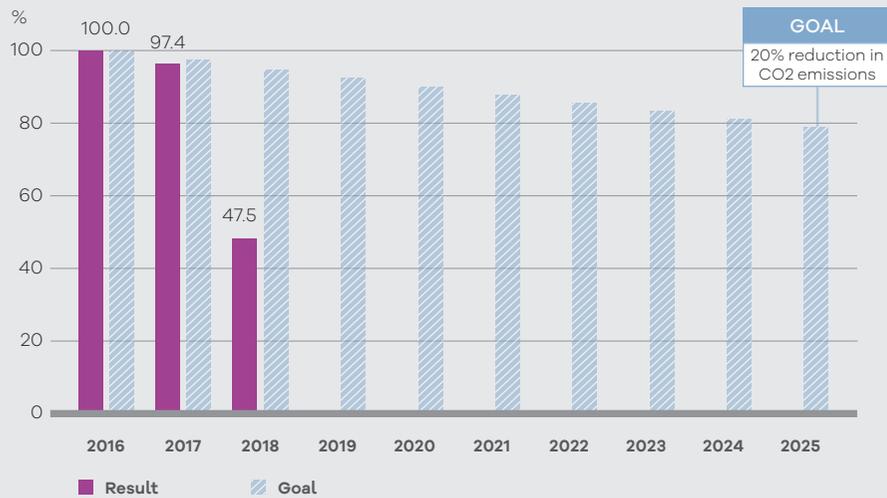
commitments made by the Group when setting its science-based targets in 2018. The science-based target concerning electricity, district heating and district cooling consumption at the Group’s properties and the fuel consumption of company cars is to reduce the Scope 1 and Scope 2 emissions by 21 per cent by 2025, using 2016 as the baseline. The sale of the printing facility reduced the combined Scope 1 and Scope 2 emissions of the year under review to such a significant extent that Alma Media’s greenhouse gas emissions fell to less than half of the 2016 level, also taking into account the other actions taken in 2018 to reduce emissions.

In the Group’s reporting for 2018, Alma Media uses figures that reflect the impact of the sold printing facility. For 2019, the Group will recalculate its reference values for energy efficiency and greenhouse gas emissions for the baseline year of 2016 to eliminate the effect of the printing facility sold by the Group. Subsequent reporting will be based on adjusted figures.

## OTHER ACTIONS TO DEVELOP ENVIRONMENTAL RESPONSIBILITY IN 2018

- Alma Media initiated an extensive energy efficiency improvement project at its old printing facility, which was leased to external parties. The property was sold in the summer, but Alma Media completed the energy efficiency improvement project in accordance with the agreement concluded with the buyer.
- Alma Media carried out a lighting renovation project at its office property in Tampere to implement LED lighting and a smart lighting control system.
- Alma Media optimised its distribution routes by discontinuing six routes during the year under review.

### CO<sub>2</sub> emissions caused by Alma Media's own activities

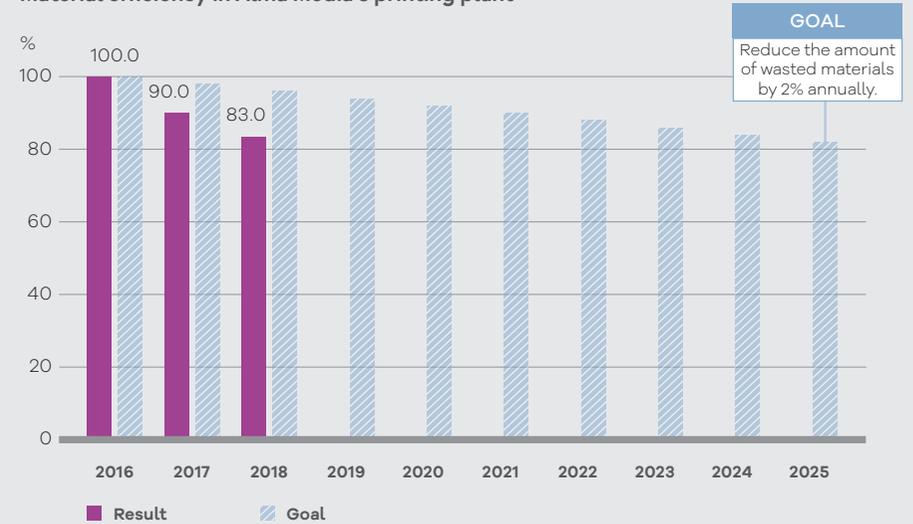


During the reporting year, the Scope 1 and Scope 2 emissions caused by Alma Media's operations fell by 52 per cent year-on-year (2017: 5,678 tCO<sub>2</sub>), calculated using the market-based method. Alma Media's consumption of electricity, district heating and district cooling as well as the fuel consumption of company cars caused emissions totalling 2,720 tCO<sub>2</sub> in 2018.

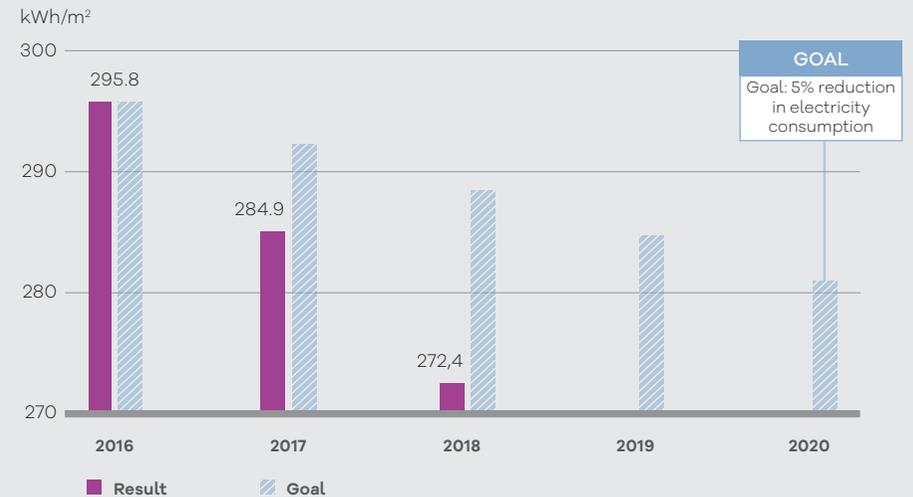
Scope 2 emissions calculated on a location basis are presented in the tables at the end of this report, on page 39.

The sharp decline in greenhouse gas emissions was mainly due to the introduction of a zero-emission electricity purchasing programme at the Group's properties in Finland and the sale of Alma Media's old printing facility. The figures reported by the Group will be adjusted in 2019 to eliminate the effect of this property sale. Emissions were also reduced by the divestment of the Group's media business in Lapland and the energy and material efficiency improvement measures taken in 2018.

### Material efficiency in Alma Media's printing plant



### Energy efficiency in Alma Media's facilities in Finland



The sale of the old printing facility, which was leased to external parties in recent years, is reflected as a substantial change in the energy efficiency figures for Alma Media's properties. The figures reported by the Group will be adjusted in 2019 to eliminate the effect of the sold printing facility.

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

Alma Media will continue to implement measures in line with its emissions reduction targets in its printing and distribution operations in 2019. At the printing facility, the main focus will remain on the improvement of material efficiency. This will be achieved by material testing as well as the development of working methods and maintenance activities, among other things. Reductions in emissions will also be sought through the development of waste management in the printing facility. Although currently 95 per cent of the waste generated in printing operations is recycled and the rest is used for energy production, in 2019 the printing facility aims to further reduce the amount of waste relative to its production volume by improving waste monitoring and engaging in closer cooperation with the waste management partner.

Alma Media also aims to increase the level of detail in its Scope 2 emissions reporting in 2019 by centralising the purchasing of electricity for the Group's properties in Finland and obtaining producer-specific emission factors from more electricity producers in the Group's other operating countries. The Group's Finnish properties will gradually transition to zero-emission electricity in accordance with a plan that extends to 2020.

## GRI ASPECTS RELATED TO ENVIRONMENTAL RESPONSIBILITY

### MATERIALS USED BY WEIGHT OR VOLUME: 301-1

**Reporting boundaries: The reporting only covers Alma Media's printing operations, which is the Group's only material-intensive function.**

In 2018, Alma Media's printing facility consumed 25,436 tonnes of paper. All of the purchased paper was certified under the international PEFC or FSC certification system to ensure sustainable forest management. The certificates guarantee that the wood used to produce the paper pulp was sourced from forests that are managed in a socially, economically and ecologically sustainable manner.

Some 32 per cent of the purchased paper was produced from recycled fibre. As the majority of the paper produced from recycled fibre by Alma Media's paper suppliers is purchased in the large consumer markets of Central Europe, the availability of recycled paper is relatively low in the Finnish market.

An itemised description of the consumption of other materials by Alma Media's printing facility in its production operations is provided at the end of the report, in the table on page 40.

### ENERGY CONSUMPTION WITHIN THE ORGANISATION: 302-1

Alma Media's consumption of electricity, district heating and district cooling totalled 58,665 GJ, or 16,296 MWh, in 2018. These figures are one-fifth lower than in the

previous year (2017: 73,672 GJ, or 20,464 MWh). The sharp decline in energy consumption was particularly due to Alma Media selling its old printing facility, which had been leased to external parties in recent years, in July 2018. The figures reported by the Group will be adjusted in 2019 to eliminate the effect of the sold property.

Alma Media continued to implement measures aimed at improving the energy efficiency of its properties during the year. The results are reported under section 305-5.

The fuel consumption of Alma Media's company cars was reduced by six per cent compared to the previous year. The consumption figure fell to 9,291 GJ (2017: 9,832 GJ). The decrease was mainly due to the size of Alma Media's fleet of company cars in Finland being reduced as a result of the divestment of the Group's media business in Lapland.

The consumption figures for electricity, district heating and district cooling are based on consumption data from the energy companies that supply Alma Media's properties in Finland. The same approach has been used in Alma Media's other operating countries where direct consumption data has been available. For properties for which direct consumption data is not available due to energy being included in the monthly rent, energy consumption is calculated based on the floor area. The fuel consumption data for company cars used by Alma Media has been primarily collected from service providers. In cases where the data was not available (12 per cent of the fleet), the calculations are

based on information on the average annual consumption of company cars used by the Group's Czech subsidiary LMC.

The energy consumption details for 2018 are presented in the tables section at the end of the report, on page 39. The table includes data on Alma Media's consumption of electricity, district cooling and district heating as well as the petrol and diesel consumption of company cars.

### DIRECT (SCOPE 1) GHG EMISSIONS: 305-1

**Reporting boundaries: Company cars under Alma Media's control in all country units. For 12 per cent of the reported vehicles, the consumption calculations are based on average consumption.**

Alma Media's Scope 1 emissions in 2018 amounted to 604 carbon dioxide equivalent tonnes. Emissions were reduced from the previous year by five per cent, or 34 tCO<sub>2</sub>. The decrease in emissions was mainly due to the size of Alma Media's fleet of company cars in Finland being reduced as a result of the divestment of the Group's media business in Lapland. The CO<sub>2</sub> emissions values reported by the manufacturers of Alma Media's company cars also continued to decline in Finland.

The CO<sub>2</sub> emissions reported by car manufacturers for 2018 were based on the NEDC method, which is being phased out. The calculations of the Scope 1 emissions in 2017, as reported in the previous Annual Report, were adjusted in connection with the process of setting Alma Media's science-based targets. The new Scope 1 emissions

figures also cover Alma Media's entire fleet of company cars for the year 2017.

The calculations are based on the emission factors reported in the Lipasto emissions database maintained by VTT Technical Research Centre of Finland.

### **ENERGY INDIRECT (SCOPE 2) GHG EMISSIONS 305-2**

Calculated using the market-based method, Alma Media's indirect GHG emissions declined during the year under review by 58 per cent from the previous year, to 2,116 tCO<sub>2</sub> (2017: 5,040 tCO<sub>2</sub>). Calculated using the location-based method, Alma Media's indirect GHG emissions amounted to 3,031 tCO<sub>2</sub> during the year under review.

The sharp decline in Scope 2 emissions is due to Alma Media's head office and printing facility transitioning to zero-emission electricity and the sale of the Group's old printing facility in July. In 2017, the old printing facility accounted for 42 per cent of Alma Media's Scope 2 emissions in Finland.

In calculating location-based Scope 2 emissions in Finland, Alma Media uses the emission factors for electricity, district heating and district cooling published by Motiva. In other countries, the Group uses the IEA's country-specific factors. Supplier-specific factors are prioritised in the market-based calculation of Scope 2 emissions. If supplier-specific factors are not available, the calculations in Finland use the Energy Authority's residual mix emission factors and the calculations for Alma Media's other operating countries use the same country-

specific IEA factors as the location-based calculations.

Alma Media's annual Scope 2 emissions starting from 2016 are presented in the tables section at the end of the report, on page 39. For 2019, the Group will recalculate its reference values for greenhouse gas emissions for the baseline year of 2016 to eliminate the effect of the printing facility sold by the Group. Subsequent reporting will be based on adjusted figures.

### **OTHER INDIRECT (SCOPE 3) GHG EMISSIONS 305-3**

Alma Media's most significant indirect GHG emissions arise from the printing facility's material purchases and distribution operations. Scope 3 emissions decreased in both of these activities in 2018, particularly due to the sale of the Group's media business in Lapland. The Group's total Scope 3 emissions also fell by 12 per cent from the previous year and by seven per cent from 2016, which is the baseline year used for the Group's science-based targets.

An itemised description of the other indirect GHG emissions caused by Alma Media's operations is provided in the summary tables at the end of this report, on page 39. The emissions are itemised according to the GHG Protocol.

### **GHG EMISSIONS INTENSITY: 305-4**

Alma Media calculates its emissions intensity based on its Scope 1 and Scope 2 emissions. Scope 2 emissions are calculated using the market-based method. Emissions intensity is reported relative to the number of employees.

The Group's emissions intensity during the year under review was 1.48 tCO<sub>2</sub>-eq per employee.

### **Reduction of GHG emissions: 305-5**

During the year under review, Alma Media began the gradual shift to zero-emission electricity in its Finnish operations, with the Alma Media head office in Helsinki and printing facility in Tampere being the first to make the transition. In the previous year, the electricity consumption of the two buildings generated a combined 1,194 CO<sub>2</sub> tonnes of emissions, calculated using the location-based method. These emissions were eliminated in 2018 as a result of the shift to zero-emission electricity.

Prior to the sale of Alma Media's old printing facility, which had been leased to external parties in recent years, the Group began an energy efficiency improvement project at the building. The project was completed under the Group's supervision in spite of the sale of the property in July 2018. The upgrades were estimated to reduce the annual Scope 2 emissions caused by the building's district heating and electricity consumption by 274 CO<sub>2</sub> tonnes, calculated using the location-based method. This estimate is taken from the final report submitted to the Business Finland innovation funding agency, which supported the project.

During the reporting year, Alma Media carried out a modernisation project at its office building in Tampere to switch to LED lighting and introduce a smart lighting control system. These changes are estimated to reduce the CO<sub>2</sub> emissions arising from

electricity consumption by 42.1 tonnes per year, calculated using the location-based method. The calculation takes into account the wattage and lifespan of the old and new light fittings as well as an estimate of the electricity savings generated by the smart control system.

### **NITROGEN OXIDES (NOX, SULFUR OXIDES (SOX) AND OTHER SIGNIFICANT AIR EMISSIONS 305-7**

Alma Media's printing operations generate small amounts of VOC (volatile organic compound) emissions each year. The printing facility is committed to keeping its annual VOC emissions under 10,000 kg and it has systematically developed its processes to minimise VOC emissions. The printing facility uses the coldset offset method, which does not generate VOC emissions. In its choices of materials, the printing facility prioritises alternatives that have low concentrations of VOCs. No solvents containing VOCs are used in washing the printing press. The washing process is automated to minimise the consumption of solvents. The consumption of printing ink has also been reduced through enhanced automation.

The VOC emissions from Alma Media's printing operations totalled 3,630 kg in 2018. Alma Media's operations do not produce other significant airborne emissions.

**WASTE BY TYPE AND DISPOSAL METHOD: 306-2**

**Reporting boundaries: The reporting covers the Group's only material-intensive function, printing operations..**

For several years, Alma Media's printing facility has been successful in continuously reducing the material waste of its production operations through systematic development efforts related to activities such as improved testing of materials. A key role in this effort is also played by the subcontractor responsible for the printing facility's waste management. The printing facility engages in active dialogue with the waste management partner to reduce waste volumes and optimise waste transport.

In 2018, a total of 2,669 tonnes of the waste generated by the printing facility was recycled. The amount of recycled non-hazardous waste was reduced by eight per cent compared to the previous year. A total of 136 tonnes of waste was forwarded to be disposed of by incineration (2017: 156 tonnes), with 54 tonnes (2017: 65 tonnes) of this total being classified as hazardous waste.

**NON-COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS: 307-1**

Alma Media was not subject to any penalties or reprimands for non-compliance with environmental laws and regulations in 2018.



# Responsible employer



# Equal and diverse work community

Alma Media treats employees equally and fairly and strives to promote diversity among employees by, for example, providing people in various life situations with opportunities to work in ways that suit their personal circumstances.

Among other things, Alma Media offers flexible working arrangements for employees with partial work ability as well as opportunities for remote and part-time work. The employment of people with reduced work ability is supported by acquiring special assistive equipment.

In Alma Media's most multicultural unit, which is the delivery unit, all communication with delivery employees representing various nationalities takes place in both Finnish and English.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

Alma Media's annual target is zero cases of discrimination. The Group was not made aware of any incidents of discrimination in 2018 through the whistleblowing channel available to employees, nor was the Group subject to any reprimands or penalties by the authorities due to discrimination or other inappropriate treatment of employees.

In July 2018, the police started a pre-trial investigation into a suspected case of

employment discrimination related to the recruitment process of Aamulehti's Editor-in-Chief. The case has been submitted to the prosecutor for consideration of charges.

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

As in the previous years, the development of managerial work will continue to be an important focus area in the Group's efforts to develop an equal and pluralistic work community in 2019. The Alma Future Leaders programme for new supervisors and managers will continue. More experienced managers will be provided with coaching and lectures to strengthen their leadership identity.

A further goal for 2019 in the Group's operations in Finland is to enhance communications with applicants during the recruitment process and increase the transparency of the recruitment policy by publishing the Group's recruitment principles on the Alma Media website. Recruitment processes will be made more efficient through the renewal of the job

application system used for the Group's recruitment activities in Finland.

To increase the diversity-related competencies of employees, Alma Media will produce online employee training

materials on the subject of unconscious bias in 2019 and encourage employees in certain groups, such as managers participating in recruitment processes, to complete the training programme.

## OTHER ACTIONS TAKEN TO DEVELOP AN EQUAL AND PLURALISTIC WORK COMMUNITY IN 2018

- All Alma Media units in Finland updated their non-discrimination, diversity and equality plans. In drafting the updated plans, the units used, among other things, wage analyses and the results of Alma Media's employee survey. While there are unit-specific differences between the plans, the typical focus areas included differences in wages, the reasons for using fixed-term employees and job-specific gender distributions.
- Investments in the development of managerial work: Alma Media organised two extensive training programmes for supervisors and managers in 2018. The international Alma Future Leaders programme was aimed at supervisors in the early stages of their careers. The FutureMe Leaders programme organised in Finland was intended for more experienced managers with the aim of strengthening their leadership identity. Training on managerial skills was also arranged during the year.

**GRI ASPECTS RELATED TO EQUALITY AND DIVERSITY**

**DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES: 405-1**

Alma Media's Board of Directors had eight members in 2018. Three (38%) of the members were women, all between 40 and 50 years of age. Of the other five Board members, two were between 40 and 50 years of age and the rest were over 50 years of age. One of the Board members was of a

nationality other than Finnish.

Alma Media's Group Executive Team consisted of 10 members during the year under review, three (30%) of whom were women. Four of the members of the Group Executive Team were between the ages of 40 and 50, and the rest were over 50.

Women represented 47 per cent of all Alma Media employees in 2018. The percentage of women in supervisory and managerial

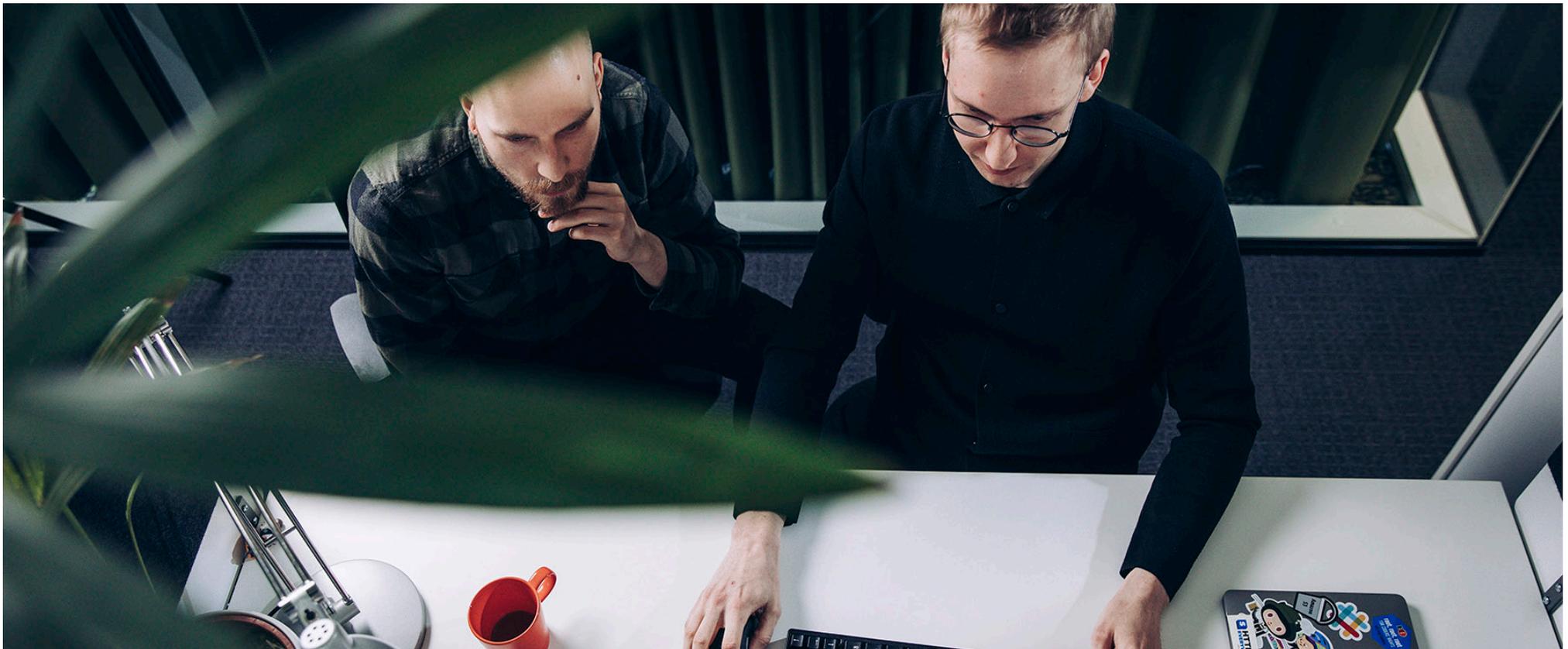
positions was 44 per cent for the Group as a whole and 47 per cent in Finland. Details on the age and gender distribution of the Group's employees are presented in the tables section at the end of the report, on page 41.

**INCIDENTS OF DISCRIMINATION AND CORRECTIVE ACTIONS TAKEN: 406-1**

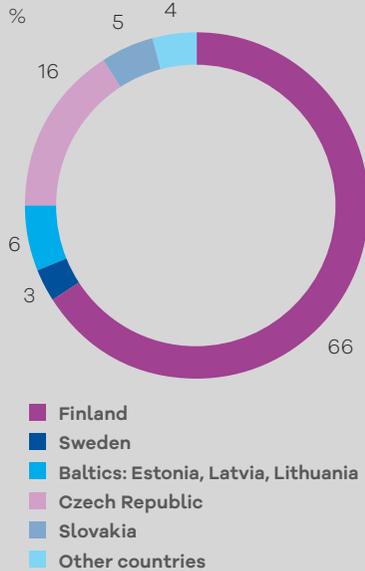
No incidents of discrimination were reported via Alma Media's whistleblowing channel during the year, nor was the Group subject

to any reprimands or penalties by the authorities due to discrimination.

In July 2018, the police started a pre-trial investigation into a suspected case of employment discrimination related to the recruitment process of Aamulehti's Editor-in-Chief. At the time of reporting, the case has been submitted to the prosecutor for consideration of charges.



The proportion of employees in different regions (12/2018)\*

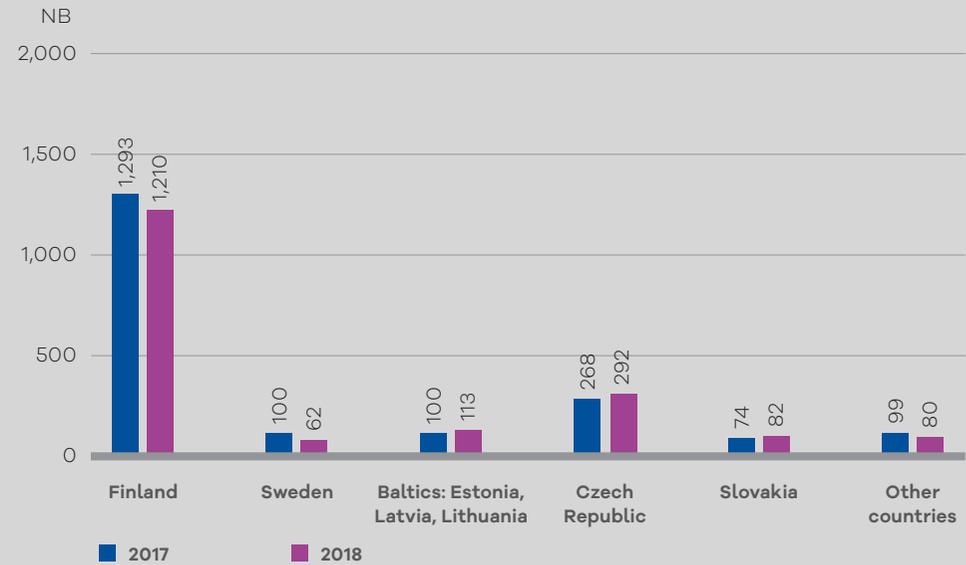


\*Total percentage may not be equal to 100, due to the figures being rounded separately.

The acquisitions of digital services during the 2010s have shaped Alma Media into an international company. The Group operates in nine countries in addition to Finland, with 33 per cent of all employees working outside Finland in 2018.

The Group's most multicultural unit in Finland is the delivery unit, with 36 different nationalities represented at the end of 2018. Approximately one fifth of the Group's delivery employees are non-natives.

The number of employees in different regions in 2017-2018 (12/2018)\*



\*The number does not include deliverers or telemarketers. At the end of 2018, there were 770 deliverers and 318 telemarketers.

Alma Media had 1,838 employees at the end of the year under review. The figures for 2017 have been adjusted in the table above because the Group changed the method of reporting the number of employees in 2018 by eliminating telemarketers from the reported figures. Delivery employees had already been eliminated from the reported total number of employees previously.

At the end of the reporting year, Alma Media employed 318 telemarketers (2017: 306) and 770 delivery employees (2017: 837).

The Group's reported number of employees in Finland decreased by 83 in 2018, mainly due to the divestment of Alma Media's media and distribution business in Lapland. Among the Group's foreign units, employee growth was the highest in the Czech recruitment service company LMC.

# Developing employee competence and well-being

The rapid digital transformation of the media sector requires Alma Media to continuously invest in the development of its employees' digital competencies and create new jobs in the Group.

The objective of Alma Media's HR strategy is to support the Group's digital transformation by systematically developing a corporate culture that promotes continuous learning and by providing employees with tools for personal development.

## DEVELOPMENT OF RESPONSIBILITY IN 2018

Alma Media has set measurable targets to assess its performance in developing the competence and well-being of employees. A QWL employee survey to gauge the quality of various areas of working life is conducted annually in all of the Group's units. The previous target was for the survey's overall index score to be at least 70 per cent each year. This target was upgraded to 75 per cent during the year under review. Alma Media's index score in the 2018 QWL survey was 77 per cent (2017: 76%).

In addition to the QWL survey, job satisfaction and the employees' perceptions of the extent to which they consider their work to be meaningful are assessed in Finland annually by a separate survey that measures the employees' willingness to recommend Alma Media as an employer to their acquaintances.

The target for this survey was also upgraded during the year under review. The new target is for Alma Media to achieve an average employee promoter score of at least 7.5 on a scale of 1–10. The previous target was 7.

The average score achieved in the employer image survey conducted in autumn 2018 was 8.1.

Alma Media aims to ensure its ability to create commitment among the professionals recruited by the Group by providing meaningful and motivating work, a pleasant work community as well as a competitive and modern work environment. The achievement of this objective is assessed by the percentage of new Alma Media employees who stay with the Group for at least two years after being hired. The target set for this indicator is 90 per cent. This target was achieved in 2018. At the end of the reporting year, 92.1 per cent of the employees who had been hired within the past two years were still employed by Alma Media. Turnover amongst employees who had been with the Group for less than two years was the highest in Alma Talent (11.8%) and Alma Markets (11.6%) and the lowest in Alma Consumer (4.9%).

In addition to targets related to competence development and job satisfaction, Alma Media has set a target related to employee well-being in the Group's delivery operations. The target is to reduce occupational accidents among delivery employees, mainly involving falling, slipping and stumbling, by half over a period of five years, using 2017 as the baseline. Progress towards this target was not achieved in 2018. The number of accidents among delivery employees increased slightly from the previous year.

The Group will continue the long-term development of induction training for delivery employees, the analysis of accidents and near misses as well as communications aimed at delivery employees. The Group will also provide delivery employees with various assistive equipment to improve safety and ergonomics (see the table on p. 35).

## FOCUS AREAS FOR THE DEVELOPMENT OF RESPONSIBILITY IN 2019

Alma Media's objective in the development of employee competence is to make learning and development an integral part of daily work and the corporate culture. This goal

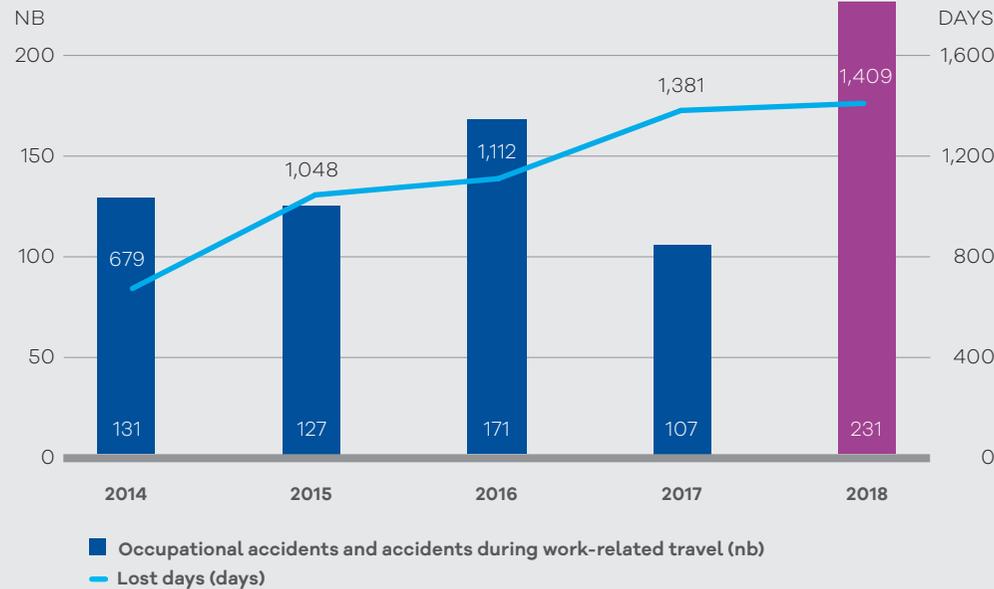
will be pursued in 2019 by supporting and monitoring the setting of individual and team-specific development targets in the Group's business units. Performance in this area will be measured by means of a questionnaire for employees to evaluate their professional development opportunities. The implementation of the Train the Alma Trainer concept that began in the previous year will also continue and the employees' interaction skills will be developed further, using tools such as DiSC profiling for members of teams.

Measures aimed at reducing occupational accidents will continue in delivery operations. Safety has been highlighted as one of the unit's incentive targets for 2019.

### OTHER ACTIONS TO DEVELOP THE COMPETENCE AND WELL-BEING OF EMPLOYEES IN 2018

- The Group introduced Train the Alma Trainer, a new concept aimed at facilitating the seamless and more efficient sharing of knowledge and expertise between employees.
- Alma Media's units in Finland set annual targets for competence development in team competence workshops or in one-to-one discussions between managers and employees.
- Alma Media's units in Finland organised the Alma Media Future Forum, a lecture series open to all employees on the impact of the digital transformation on working life.
- Developing well-being: Alma Media's business functions in Finland increased the use of preventive occupational health services, such as as regular check-ups for employees in certain age groups.

### Occupational accidents, accidents during work-related travel and resulting lost days in Finland



1,409 days of sick leaves caused by occupational accidents or accidents during work-related travel were reported in Alma Media's units in Finland in 2018. All in all, a total of 19,906 days of sick leave were accounted, with delivery employees accounting for two thirds of this amount.

Delivery employees accounted for an even larger proportion, 73 per cent, of occupational accidents and accidents during work-related travel. Of the 231 occupational accidents and accidents during work-related travel recorded during the year, 168 occurred in delivery operations.

### GRI ASPECTS RELATED TO THE DEVELOPMENT OF EMPLOYEE COMPETENCE AND WELL-BEING

#### INFORMATION ON EMPLOYEES AND OTHER WORKERS: 102-8

**Reporting boundaries: The reported information has not been itemised by gender as recommended in the GRI reporting guidelines.**

Nine of ten employees in Alma Media's operating countries are in a permanent employment relationship.

Full-time employment was the predominant type of employment relationship in all of the

Group's countries of operation. In Finland, however, nearly half (45 per cent) of the employment relationships are part-time, which is explained by delivery staff accounting for a large proportion of the employees. In addition to employees in an employment relationship with Alma Media, the Group's media brands in Finland also make extensive use of freelance workers. The editorial offices often have an established network of journalists and photographers for acquiring stories, photos or video footage as needed.

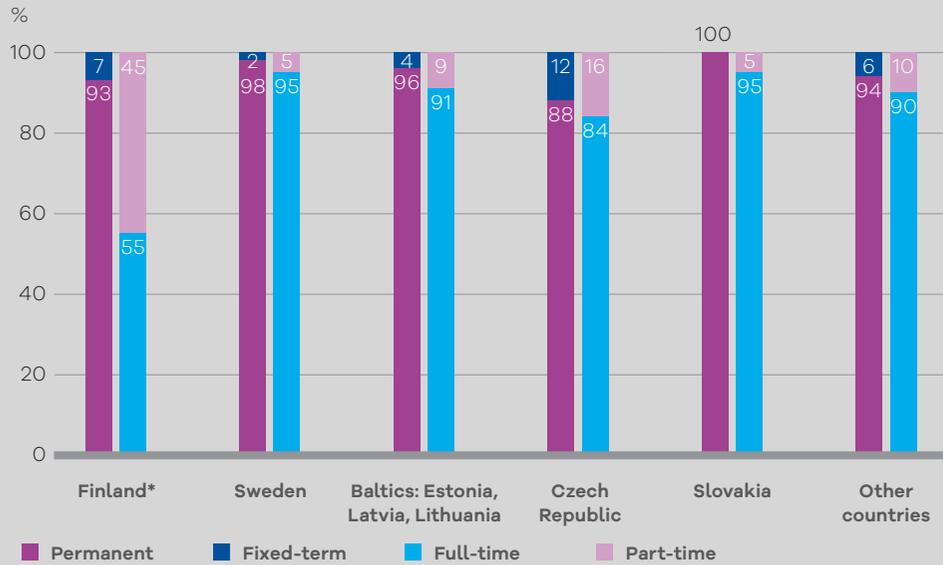
The employee age structure is fairly similar in all of Alma Media's operating countries. The largest age group in each country is 30–50.

Among the country units, the proportion of employees over 50 years of age is the highest in Finland at 27 per cent. In the other operating countries, at least 70 per cent of the employees are between the ages of 30 and 50.

The proportion of employees under 30 years of age is the highest in Slovakia at 28 per cent.

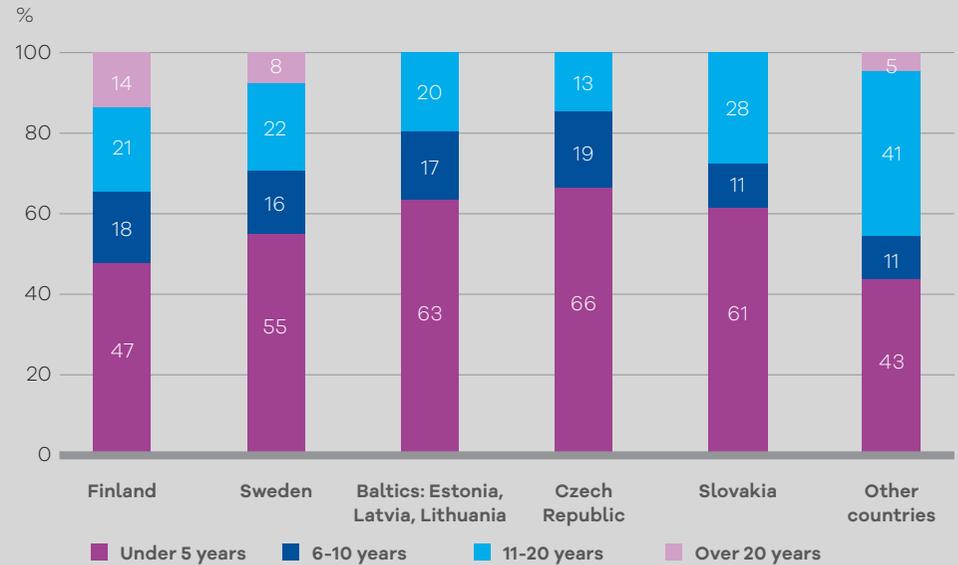
More detailed country-specific information on Alma Media's employment relationships and age structure is provided on the next page and in the tables at the end of this report, on page 41.

Employees by contract type in different regions (12/2018)



\* Large proportion of deliverers among employees explains the high share of part-timers in Finland.

Duration of employment (12/2018)\*



\* Total percentage may not be equal to 100 due to the figures being rounded separately.

**HAZARD IDENTIFICATION, RISK ASSESSMENT AND INCIDENT INVESTIGATION: 403-2**

**Reporting boundaries: The reporting only covers Alma Media’s delivery operations, which account for the majority of the occupational accidents in Alma Media.**

Due to variable weather conditions and the mobile and physical nature of their work, delivery employees are vulnerable to slipping, stumbling and falling. With this in mind, Alma Media’s delivery function places a high priority on the development of occupational safety.

Communication plays a key role in hazard identification and the prevention of accidents among delivery employees. Occupational safety was highlighted as a key theme in Alma Media’s delivery operations in 2018 and it has been systematically discussed in employee meetings and the induction training of new employees. The aim is to create a strong occupational safety culture among delivery employees.

Injuries are prevented by providing delivery employees with tools that promote occupational safety. Delivery employees also have access to smartphones that are used to communicate issues that influence night-time delivery operations. Occupational safety is taken into consideration in the planning of delivery routes.

Accidents and near misses are analysed in joint monthly meetings between occupational safety and health representatives and managers that include a review of current topics related to occupational safety and health.

**PROGRAMMES FOR UPGRADING EMPLOYEE SKILLS AND TRANSITION ASSISTANCE PROGRAMMES: 404-2**

**Reporting boundaries: Collecting the data has only been possible in Finland.**

Alma Media favours various methods of learning on the job, such as job rotation, peer learning, online learning as well as targeted training tailored for teams and groups. Alma Media’s employees also supplement their skills and expertise regularly in various short seminars and training events organised by external parties.

In accordance with Alma Media’s HR strategy, the focus areas of competence development in 2018 were managerial skills and digital competencies. In addition to the training initiatives mentioned on page 32, the Group’s key actions in this area included the Alma Academy programme aimed at improving the digital competencies of media sales representatives and an artificial intelligence training course for employees to complete independently in a digital learning environment.

Each year, a number of Alma Media employees also pursue longer-term training on a voluntary basis. Including delivery staff, a total of 90 employees in Finland used the opportunity to take study leave during the year. As in previous years, Alma Media again supported its employees financially in these cases. The extent and form of the support was determined on a case-by-case basis. The evaluation was based on whether the training was considered to improve the employee’s competencies and abilities in his or her work at Alma Media.

The sustained transformation of the industry has given rise to the need for reductions in employees in media companies in recent years, and Alma Media is no exception. When statutory personnel negotiations concerning reductions are held, Alma Media always assesses various opportunities for providing support to employees who are made redundant. This includes both financial support and support in finding new employment. Employees who are made redundant in the Group’s units in Finland are offered voluntary re-employment training provided by an external partner, including group and individual training related to jobseeking. The Group may also offer financial retraining support for employees.

Part of the process of statutory personnel negotiations always involves determining whether the employee can be assigned a new role within Alma Media.

**404-3 PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS**

**Reporting boundaries: Collecting the data has only been possible in Finland.**

Alma Media evaluates the development opportunities of employees by a survey to determine whether employees have discussed their career development with their supervisors during the past year. According to the survey results in 2018, 76 per cent of Alma Media’s employees had had such discussions.

Another employee survey asks employees to rate their career development opportunities at Alma Media on a scale of 0–5. The average

score in 2018 was 3.8, with the target being 3.5 at a minimum.

# Calculation and data collection principles for CR reporting

Alma Media publishes a corporate responsibility report annually. As with the annual report and financial statements, this corporate responsibility report covers the period 1 January–31 December 2018. The previous report was published in March 2018.

The corporate responsibility data was collected from the Group's internal statistical systems, subcontractors and partners. The calculations are made in adherence to the GRI Standards, with the Group's reporting on responsible journalism being the only exception. Reporting on responsible journalism is based on the GRI G4 framework that preceded the GRI Standards because the media sector supplement has not been updated yet.

The financial reporting included in Alma Media's corporate responsibility reporting complies with the International Financial Reporting Standards (IFRS) and the figures pertaining to economic responsibility are taken from the financial statements. Reporting related to corporate governance complies with the legislation governing listed companies and the Finnish Corporate Governance Code for listed companies. The numbers concerning environmental responsibility have primarily been collected from suppliers and the invoicing function. Location-based CO2 emissions calculations are based on emission factors provided by Statistics Finland, Finnish Energy and the IEA. Market-based emissions calculations are based on supplier-specific emission factors and the EU member states' residual mix emission factors. Information pertaining to social responsibility is collected from HR information systems and sources such as the Group's insurance company. The information concerning journalism is collected from the Council for Mass Media.

Any boundaries pertaining to the reported aspects are indicated in the report in the section in question.

The 2018 report has not been subject to independent assurance.

## CONTACT INFORMATION

The table below contains contact details for the individuals in charge of the development of corporate responsibility at Alma Media.

Name	Position	Unit
<b>Responsible journalism</b>		
Arno Ahosniemi	Executive Editor-in-Chief	Alma Talent media
Erja Yläjärvi	Senior Editor-in-Chief	Iltalehti
Tomi Lähdeniemi	Senior Editor-in-Chief	Satakunnan Kansa
Jussi Tuulensuu	Senior Editor-in-Chief	Aamulehti
<b>Responsible marketing</b>		
Tiina Järvilehto	Senior Vice President, media sales	Alma Media Solutions
Elina Kukkonen	Senior Vice President, Communications and Brand	Alma Media
<b>Responsibility for employees</b>		
Virpi Juvonen	Senior Vice President, Human Resources	Alma Media
<b>Environmental responsibility</b>		
Jussi Pekkarinen	Quality Manager	Alma Manu (printing business)
Antti Moilanen	Logistics Manager	Alma Manu (delivery business)
Jarno Lintunen	Facility Manager	Alma Media
<b>Responsibility throughout the supply chain</b>		
Risto Jauhiainen	Chief Procurement Officer	Alma Media
<b>Transparency and ethics in business, risk management</b>		
Mikko Korttila	General Counsel	Alma Media
Juha Nuutinen	Chief Financial Officer	Alma Media
<b>Information security and data protection</b>		
Santtu Elsinen	Chief Digital Officer	Alma Media
Matti Venho	Data Protection Officer	Alma Media
<b>Social projects</b>		
Elina Kukkonen	Senior Vice President, Communications and Brand	Alma Media
Kirsi Hantula	Corporate Responsibility Manager	Alma Media

# Environmental and employee-related figures from 2018

A summary of Alma Media's environmental and employee-related figures for 2018 is presented in the table below.

Alma Media and environment	Unit	2016	2017	2018	2019	2020	Comments
The calculations of energy consumption and Scope 1 and 2 emissions have been corrected retroactively during the 2018 reporting. The new numbers are based on the improved environmental data that was gathered when Alma Media defined its science based climate targets.							
<b>Energy consumption</b>							
Petrol	GJ	6,129	6,680	6,451			
Diesel	GJ	2,941	3,152	2,840			
Electricity	GJ	46,833	46,476	41,927			
District heating and cooling	GJ	29,526	27,196	16,738			
<b>Emissions</b>							
<b>Direct emissions (Scope 1)</b>	tCO <sub>2</sub> -ekv						
Fuels		586	638	604			
<b>Indirect emissions (Scope 2)</b>	tCO <sub>2</sub>						
District heating, cooling and electricity consumption, market-based		5,137	5,040	2,116			
District heating, cooling and electricity consumption, location-based		n/a	3,769	3,031			
<b>Other indirect emissions (Scope 3)</b>	tCO <sub>2</sub> -ekv						
Purchased goods and services		27,768	30,431	27,019			The reported figures deviate from those published in Alma Media's CDP reports because the DEFRA factors used in emissions calculations were changed in 2018 to reflect the annual average EUR/GBP exchange rate according to the Bank of Finland's statistics instead of the previously used exchange rate on 30 December. The emissions calculations for 2016 and 2017 have been revised using the average EUR/GBP exchange rate of the year in question.
Upstream transportation and distribution		17,032	17,566	14,851			
Waste generated in operations		3,042	2,773	2,516			
Business travel		241	248	215			
Employee commuting		5	5	4			
Use of sold products		1,048	1,048	1,029			
End-of-life treatment of sold products		505	536	496			
Scope 3 emissions, total		49,641	52,609	46,131			

Alma Media's printing business and environment	Unit	2016	2017	2018	2019	2020	Comments
<b>Materials used in printing</b>							
Paper	tonnes	26,305	27,551	25,436			
Paper, certified	tonnes	26,305	25,374	25,436			
Paper, share of recycled paper	per cent	35	32	32			
CO2 intensity of the paper used	kg CO2/ paper tonne	167	153	139			
Inks	tonnes	551	636	598			
Coldset Offset as printing technology	tonnes	551	636	598			
Printing plates	tonnes	135	146	139			
<b>Water consumption of printing</b>							
Municipal water	m <sup>3</sup>	3,465	3,387	3,566			
<b>VOC emissions of printing</b>							
VOC emissions	kg	4,442	2,328	3,630			
<b>Waste caused by printing</b>							
<b>Waste incineration</b>							
Hazardous waste	tonnes	n/a	65	54			The reporting of 2016 has been corrected. In 2016 all waste to be incinerated was falsely reported as hazardous waste. In reality, in 2017, for example, less than half of the incinerated waste was hazardous.
All waste to be incinerated		150	156	136			
<b>Recycling</b>							
Non-hazardous waste	tonnes	3,063	2,917	2,669			

## Alma Media and Personnel

The calculations below are based on the number of employees at the end of the year. For this reason, they may deviate slightly from the employee figures provided by Alma Media in other contexts, which are typically based on the average number of employees during the year.

The number of employees in different countries	2016	2017	2018	2019	2020
Finland	1,460	1,293	1,210		
Sweden	94	100	62		
Baltics: Estonia, Latvia, Lithuania	267	100	113		
Czech Republic	263	268	292		
Slovakia	60	74	82		
Other countries	79	99	80		
Total	2,223*	1,934	1,838		

\* The number of personnel in 2016 and in other years is not comparable because, along with deliverers, also telemarketers have been excluded from the reported numbers from 2017 onwards.

The share of different age groups in the personnel (12/2018), %	Under 30 yrs.	30-50 yrs.	Over 50 yrs.
Finland	21	52	27
Sweden	5	70	25
Baltics: Estonia, Latvia, Lithuania	27	70	2
Czech Republic	23	76	1
Slovakia	28	71	1
Other countries	26	71	3

The share of different sexes in the personnel (12/2018), %	Women	Men
Finland	45	55
Sweden	53	47
Baltics: Estonia, Latvia, Lithuania	72	28
Czech Republic	43	57
Slovakia	54	46
Other countries	55	45
In the entire group	47	53

The share of women in managerial positions in different countries (12/2018), %	Women as managers	Men as managers
Finland	47	53
Sweden	25	75
Baltics: Estonia, Latvia, Lithuania	40	60
Czech Republic	24	76
Slovakia	55	45
Other countries	55	45
In the entire group	44	56

# GRI index

GRI indicator		Location	Comments
<b>Organizational profile</b>			
102-1	Name of the organization	Report by the Board of Directors and Financial Statements p. 3	
102-2	Activities, brands, products, and services	Report by the Board of Directors and Financial Statements pp. 73-74, 3, 7-8	
102-3	Location of headquarters	www.almamedia.fi/en/contacts	
102-4	Location of operations	Report by the Board of Directors and Financial Statements p. 73	
102-5	Ownership and legal form	Report by the Board of Directors and Financial Statements pp. 23-24, 73	
102-6	Markets served	Report by the Board of Directors and Financial Statements p. 40	
102-7	Scale of the organization	Report by the Board of Directors and Financial Statements p. 46	
102-8	Information on employees and other workers	p. 34	
102-9	Supply chain	pp. 24-25	
102-10	Significant changes to the organization and its supply chain	Report by the Board of Directors and Financial Statements, Corporate Responsibility Report pp. 73-74, 24-25	
102-11	Precautionary Principle or approach	Report by the Board of Directors and Financial Statements pp. 35-39	
102-12	External initiatives	pp. 7-9	
102-13	Membership of associations	p. 10	
<b>Strategy</b>			
102-14	Statement from senior decision-maker	pp. 3	
102-15	Key impacts, risks, and opportunities	Report by the Board of Directors and Financial Statements pp. 18-20	
<b>Ethics and integrity</b>			
102-16	Values, principles, standards, and norms of behavior	Report by the Board of Directors pp. 7-9	
102-17	Mechanisms for advice and concerns about ethics	pp. 21-22	
<b>Governance structure</b>			
102-18	Governance structure	Corporate Governance Statement p. 4	
102-19	Delegating authority	Corporate Governance Statement p. 4	
102-20	Executive-level responsibility for economic, environmental, and social topics	p. 38	
102-21	Consulting stakeholders on economic, environmental, and social topics	p. 10	
102-22	Composition of the highest governance body and its committees	Corporate Governance Statement pp. 5-8	
102-23	Chair of the highest governance body	Corporate Governance Statement p. 5	
102-24	Nominating and selecting the highest governance body	Corporate Governance Statement p. 5, 9	
102-25	Conflicts of interest	p. 67, Corporate Governance Statement p. 5-8, 78	
102-26	Role of highest governance body in setting purpose, values, and strategy	Corporate Governance Statement p. 8	

GRI indicator		Location	Comments
102-27	Collective knowledge of highest governance body	Corporate Governance Statement p. 9	
102-28	Evaluating the highest governance body's performance	Corporate Governance Statement p. 10	
102-29	Identifying and managing economic, environmental, and social impacts	Report by the Board of Directors and Financial Statements pp. 18-19	
102-30	Effectiveness of risk management processes	Report by the Board of Directors and Financial Statements pp. 18-19	
102-31	Review of economic, environmental, and social topics	Corporate Governance Statement p. 19	
102-32	Highest governance body's role in sustainability reporting	p. 7	
102-33	Communicating critical concerns	Report by the Board of Directors and Financial Statements pp. 18-20	
102-34	Nature and total number of critical concerns	Report by the Board of Directors and Financial Statements pp. 18-20	
102-35	Remuneration policies	Corporate Governance Statement pp. 21-25	
102-36	Process for determining remuneration	Corporate Governance Statement pp. 21-25	
102-40	List of stakeholder groups	p. 10	
102-41	Collective bargaining agreements		Information about the number of employees covered by collective bargaining agreements is available from our operations in Finland and Sweden. Starting from the beginning of 2018 all of Alma Media's employees in Sweden are covered by local bargaining agreements. In Finland the share of personnel covered is 88%. Also in the other countries where Alma Media operates the Group complies with local labor laws.
<b>Stakeholder engagement</b>			
102-42	Identifying and selecting stakeholders	p. 10	
102-43	Approach to stakeholder engagement	p. 10	
102-44	Key topics and concerns raised	p. 10	
<b>Reporting practice</b>			
102-45	Entities included in the consolidated financial statements	pp. 72-73	
102-46	Defining report content and topic Boundaries	pp. 6-7, 38	
102-47	List of material topics	pp. 6-7, 38	
102-48	Restatements of information	pp. 6-7, 38	
102-49	Changes in reporting	pp. 6-7, 38	
102-50	Reporting period	p. 38	
102-51	Date of most recent report	p. 38	
102-52	Reporting cycle	p. 38	
102-53	Contact point for questions regarding the report	p. 38	
102-54	Claims of reporting in accordance with the GRI Standards	p. 38	
102-55	GRI content index	p. 42	
102-56	External assurance	p. 38	

GRI indicator		Location	Comments
<b>Management approach</b>			
103-1	Explanation of the material topic and its Boundary	p. 6	
103-2	The management approach and its components	pp. 7-9	
103-3	Evaluation of the management approach	pp. 7-9	Targets set for Alma Media's corporate responsibility aspects are presented in the corporate responsibility report on the pages 39-65.
<b>Economic standards</b>			
<b>Economic performance</b>			
201-1	Direct economic value generated and distributed	p. 21	
201-4	Financial assistance received from government	p. 13	
<b>Anti-corruption</b>			
205-3	Confirmed incidents of corruption and actions taken	p. 21	
<b>Anti-competitive behavior</b>			
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 21	
<b>Environmental standards</b>			
<b>Materials</b>			
301-1	Materials used by weight or volume	p. 27, 40	
<b>Energy</b>			
302-1	Energy consumption within the organization	p. 27, 39	
<b>Emissions</b>			
305-1	Direct (Scope 1) GHG emissions	p. 27, 39	
305-2	Energy indirect (Scope 2) GHG emissions	p. 28, 39	
305-3	Other indirect (Scope 3) GHG emissions	p. 28, 39	
305-4	GHG emissions intensity	p. 28	
305-7	Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions	p. 28	
<b>Effluents and waste</b>			
306-2	Waste by type and disposal method	p. 29	
<b>Social standards</b>			
<b>Occupational health and safety</b>			
403-2	Hazard identification, risk assesment, and incident investigation	p. 37	
<b>Training and education</b>			
404-2	Programs for upgrading employee skills and transition assistance programs	p. 37	
404-3	Percentage of employees receiving regular performance and career development reviews	p. 37	



GRI indicator		Location	Comments
<b>Diversity and equal opportunity</b>			
405-1	Diversity of governance bodies and employees	p. 32	
<b>Non-discrimination</b>			
406-1	Incidents of discrimination and corrective actions taken	p. 32	
<b>Public policy</b>			
415-1	Political contributions	p. 14	
<b>Marketing and labelling</b>			
417-3	Incidents of non-compliance concerning marketing communications	p. 19	
<b>GRI 418: Customer privacy</b>			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 18	
<b>Socioeconomic compliance</b>			
419-1	Non-compliance with laws and regulations in the social and economic area	p. 22	
<b>GRI G4 indicator</b>			
<b>Standards for media sector</b>			
G4-M1	Significant funding and other support received from non-governmental sources	p. 13	
G4-M2	Monitoring ethics in journalism	p. 13	
G4-M3	Actions taken to improve adherence to content creation values, and results obtained	p. 13	
G4-M4	Actions taken to improve performance in relation to content dissemination issues (accessibility and protection of vulnerable audiences and informed decision making) and results obtained	p. 13	
G4-M7	Actions taken to empower audiences through media literacy skills development	p. 14	



# Global Compact content index

Principle	Location
<b>Human rights</b>	
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.	Code of Conduct
Principle 2: Businesses should make sure that they are not complicit in human rights abuses.	Code of Conduct, pp. 21-23, 31
<b>Labour</b>	
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	p. 43
Principle 4: Businesses should support the elimination of all forms of forced and compulsory labour.	Code of Conduct, pp. 21-23, 31
Principle 5: Businesses should support the effective abolition of child labour.	Code of Conduct, pp. 21-23, 31
Principle 6: Businesses should support the elimination of discrimination in respect of employment and occupation.	Code of Conduct, pp. 21-23, 31
<b>Environment</b>	
Principle 7: Businesses should support a precautionary approach to environmental challenges.	p. 28
Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.	p. 25
Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.	Code of Conduct, p. 23
<b>Anti-corruption</b>	
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	Code of Conduct, p. 21-23