SUSTAINABILITY REPORT

ΞL IIE

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Sustainable Alma Media

We encourage sustainable choices

Sustainability work is an integral and constantly developing part of our operations. Our basic mission is to accelerate the sustainable growth of individuals, businesses and society aiming to maximise the positive impact of our operations on society and minimise our environmental footprint. We carefully listen to our customers and employees and ensure that our working environment is encouraging and safe.

We are a low-carbon company

We have been implementing our strategy based on the digital transformation for two decades already. While only six per cent of our revenue was from digital operations in 2005, by last year, this percentage had increased to as much as 80 per cent.

Our digital journey has clearly improved our profitability while also changing our climate profile to a significantly more low-carbon one. Over the past six years, we have halved the emissions caused by our operations. Only four per cent of the greenhouse gases generated by the company are created by the company's own operations while 96 per cent are created by the subcontracting chain.

During the year under review, Alma Media received again the Leadership level grade A–, the second highest score, in the Climate Change Disclosure 2022 assessment of the international CDP organisation. We also updated our science-based climate targets to be more ambitious: we commit to reduce the greenhouse gas emissions of our own operations (Scope 1 and 2) by 52 per cent and emissions of the subcontracting chain (Scope 3) by 14 per cent by 2030. We are part of a united front that seeks to limit global warming to no more than 1.5 degrees Celsius.

In minimising our carbon footprint, we pay attention to our digital service design and other own operations, and the our subcontracting chain.



Helping Ukrainians

Last year, we developed the Ukrainianlanguage Workania.eu service platform to make it easier for Ukrainian citizens fleeing Ukraine to find work in our 11 operating countries. To help those caught up in the brutal war, we made a one-off donation to People In Need, the largest charity in Eastern Central Europe. We also supported international aid organisations, the Finnish Red Cross and UNICEF by delivering donations from Finland through our media and service websites.

Alma Media's management, employees in Finland and management teams in our 11 operating countries committed to a common sustainability target alongside financial targets as part of our employees' incentive system. We required more than half of our most significant suppliers to commit to our Code of Conduct and each Alma employee completed the Code of Conduct training designed for employees.

Better journalism, better society

Our journalistic media have a significant impact on the society around us and it sustainable development. Last year, Kauppalehti and Tekniikka&Talous among other actions developed an assigned indexing that distinguishes even better the content providing solutions to climate change in our media. As for Iltalehti, it organised a journalist training covering the terminology of diversity and gender minorities with the non-governmental organisation SETA which deals with the human rights of LGBT+ people. The Council for Mass Media provided training for Alma Media's journalists on the factors influencing condemnatory decisions. Last year, Kauppalehti and Tekniikka&Talous developed an assigned indexing that distinguishes climate change solutions from the content.

With the help of our media, we aim to increase awareness and understanding of sustainable development and offer practical solutions in making sustainable choices.

Our values, sustainability targets and operating principles are reflected in our everyday activities, guiding our daily work. We also want to inspire our partners to commit to promote sustainable development in an ambitious, comprehensive and effective manner.

Learn more in our sustainability report for 2022!

Kai Telanne

President and CEO

Sustainability year 2022

SHOWING SUPPORT AND SOLIDARITY WITH THE UKRAINIANS

We developed the Ukrainian-language Workania.eu service platform to make it easier for people fleeing Ukraine to find work in our 11 operating countries. We made a one-off donation to People In Need, the largest NGO in Eastern Central Europe, to help Ukrainians in the midst of the war. We supported international humanitarian aid organisations, the Finnish Red Cross and UNICEF by delivering donations from Finland through our media and service websites.

EMPLOYEES AND SUBCONTRACTORS COMMIT TO CODE OF CONDUCT

We designed and implemented a Code of Conduct online training for our subcontracting network. We successfully inspired more than half of our most significant suppliers to commit to our Code of Conduct.

In our 11 operating countries, each of our employees completed the Code of Conduct training by the end of 2022.

JOURNALISM SUPPORTING SUSTAINABLE DEVELOPMENT

The audience of Iltalehti and financial and professional media continued to grow.

Kauppalehti and the Tekniikka&Talous media developed an assigned indexing that distinguishes climate change solutions from the content. Iltalehti organised a journalist training covering the terminology of diversity and gender minorities with SETA. The Council for Mass Media provided training for Alma Media's journalists on the factors influencing condemnatory decisions.

FUTURE-FIT WORKFORCE

We provided diverse support to develop and maintain well-being at work for Alma Medians. We continued and further developed the operating model of multi-location work. We developed the competence and leadership of Alma's employees through numerous training and coaching programmes. We investigated the development opportunities related to diversity, equality and the sense of inclusion.

MORE AMBITIOUS CLIMATE TARGETS

Alma Media's new, tightened targets under the Science Based Targets initiative (SBTi) were officially approved. The target is in line with the international trajectory limiting global warming to 1,5 degrees Celsius. We will reduce the greenhouse gas emissions of our own operations (Scope 1 and 2) by 52 per cent and the greenhouse gas emissions of our subcontracting chain (Scope 3) by 14 per cent by 2030.

SUSTAINABILITY BECOMES A BASIS FOR INCENTIVES

Alma Media's management, employees in Finland and management teams in our 11 operating countries committed to a common sustainability target alongside financial targets. Our sustainability target covers seven indicators related to the environment, social responsibility and good governance.

Alma Media's sustainability programme

SUSTAINABLE ALMA MEDIA AND SUSTAINABLE BRANDS

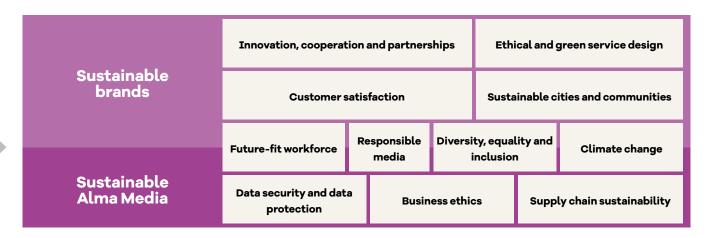
PROFITABLE GROWTH AND HIGH BUSINESS ETHICS	FUTURE-FIT WORKFORCE	ENVIRONMENTAL RESPONSIBILITY	RESPONSIBLE MEDIA, JOURNALISM AND MARKETING	RESPONSIBLE SERVICES AND MARKETPLACES
The profitability of operations is a prerequisite for our sustainable growth. We expect high integrity and ethics from ourselves and our cooperation partners. We do not accept violations of human rights, discrimination, harassment or corruption.	We promote sense of equality, in- clusion and diversity in our work community. We provide develop- ment opportunities for our our employees.	We minimise the greenhouse gas emissions of our own operations and our subcontracting chain. We set an example of the transi- tion to digital business in the me- dia sector.	Reliable, pluralistic and indepen- dent journalism is a precondition for democracy in our society. We take responsibility for our con- tents, correct any errors and de- fend the freedom of speech. We develop media and services and use data responsibly.	Our leading digital services for mobility, housing and recruit- ment enable sustainable choic- es in both business activities and private consumption.
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Materiality analysis



In autumn 2021, Alma Media conducted a materiality analysis to identify the expectations of its key stakeholders for the company's sustainability work. The analysis was based on an extensive stakeholder survey, sector analyses, interviews of individuals and workshops for employee groups. Over 1,000 readers of Alma's media and users of our services as well as over 500 Group employees responded to the survey in October–November 2021. In addition, we organised several internal discussion forums and nine workshops with internal and external specialists in order to determine the objectives for the corporate responsibility programme.

The materiality analysis led to the definition of 11 essential sustainability areas for Alma Media. These 11 focus areas can be inspected at two levels: sustainable Alma Media and sustainable brands. Alma Media's stakeholders consider the company's digital transition, which has continued for years, to be a positive development and recognise the company's previous sustainability efforts. According to stakeholders, Alma Media's sustainability efforts emphasise the importance of data protection and data security, responsible processing of data and responsibility in the development of new digital business. From the perspective of social sustainability, the Group's key focus areas include the well-being of employees, competence development, career opportunities and the equal treatment of employees. From the environmental perspective, our stakeholders felt that the positive environmental impact of products and services as well as the environmental efficiency of Alma Media's own operations were the most important subjects.



Alma Media updated its materiality analysis in 2021 based on an extensive stakeholder survey, individual interviews and sector analysis as well as workshops.

Stakeholder	Form of interaction	Matters most relevant for the group of stakeholders
Employees	 Online survey to all employees Workshops and discussion forums with different employee groups 	 Employee well-being, appreciation and equal treatment Competence development and support for career opportunities Profitable and stable business Sustainability in the development of new products and services Reliable and fair management communications Code of Conduct and anticipation of risks
Readers, users, consumers	• An online survey for the readers and users of the biggest media and websites	 Reliability of information, journalistic integrity and accuracy of contents Promoting societal discussion and freedom of speech Preventing misleading and false advertising Observing the laws and regulations in the collection and processing of personal data Taking care of the data security and data protection of services Responsible processing and utilisation of customer data
Customers, advertisers	• Operational analyses of the most relevant customer industries for our revenue and individual interviews with representatives of the companies	 Good environmental risk management Emphasising social sustainability and good governance in Alma's international business Ensuring competent workforce in the digital transformation Ensuring the ethics of advertising and the brand safety of our own advertising platforms
Investors, shareholders, analysts	• Analyst interviews	 Market environment and competitive landscape, objectives, reporting, strategy and financial position Adequate and balanced sharing of financial and non-financial information about the Group Responding to increasingly tight sustainability requirements Alma Media's sustainability story as a part of the equity story Building sustainable business growth
Suppliers, subcontractors	• Interviews with the managers of key purchasing sectors (printing, delivery and ICT)	 Fair and equal treatment, equitable, open and transparent supplier requirements Alma Media's procurement policy and Code of Conduct for suppliers Cooperation to minimise greenhouse gas emissions in the partner network
Media	• Desktop analysis and interviews of the Editors-in-Chief of the biggest media	 Responsible journalism and marketing, high quality of data Data protection and data security according to the laws and regulations Openness, transparency and proactivity in the offering of information Accuracy of contents Quick response and replying to enquiries
Society and the authorities	• Sector and desktop analysis	 Observing the laws and regulations in the collection and processing of personal data Taking care of the data security and data protection of services Responsible processing and utilisation of customer data

The Sustainable Development Goals of the UN relevant for Alma Media

The Sustainable Development Goals of the UN cover the global challenges shared by us all. Alma Media is committed to supporting sustainable growth in society, for companies and for individuals. Based on our materiality analysis, Alma Media has included nine Sustainable Development Goals of the UN in its sustainability programme.



We focus on the competence development of our employees and support personal career development by providing many kinds of training and coaching. Our selection of publications and training enables the development of skills required in working life.



Our media raise awareness about innovations for sustainable development, the financial and non-financial results of companies and solutions to mitigate climate change. We also encourage innovation in our organisation.



The carbon footprint of our operations was halved within the past six years. We set an example for our industry in the transition to a low-carbon society. We minimise the CO_2 emissions of our own operations and those of our subcontracting chain.



Our media increase understanding of the importance of equal working life in society. We offer equal opportunities for development and require gender equality and the development of diversity and sense of inclusion in our work community.



We bring together supply and demand as well as service providers and consumers and offer sustainable options for housing, mobility, working life and recruitment.



Reliable and independent journalism is a precondition for functional democracy in society. Our media cherish peace and fairness, examine the ethically sustainable operations of those in power and do not hesitate to reveal any injustices.



Our financial and professional media focus on the promotion of sustainable financial growth. Our cooperation with various parties aims to support young people and those suffering from reduced working capacity. Alma is an employer and a taxpayer in 11 European countries.



Our media publish news about the environmental impacts of different industries and increase awareness of sustainable consumption. We seek to maximise the positive environmental impacts of our operations and inspire to make sustainable choices.



Our media and services are widely connected with business and society and through numerous sustainable projects in our 11 European countries. We carefully select our partners and require ethically sustainable business.

Sustainable Alma Media



Management of corporate sustainability and risks

Alma Media's sustainability efforts are guided by the Group's core values as well as the Sustainable Development Goals (SDG) of the UN that are the most relevant to Alma Media's business:

- quality education (SDG 4)
- gender equality (SDG 5),
- decent work and economic growth (SDG 8),
- innovation and procurement (SDG 9),
- sustainable cities and communities (SDG 11, related to the housing marketplace business in Finland),
- responsible consumption (SDG 12, related to the ability of consumer media and services to influence consumer choices),
- climate change mitigation (SDG 13),
- peace and justice (SDG 16, related to the functioning of media as a social institution), and
- partnerships and co-operation for the goals
 - (SDG 17, related to Alma Media's ability to contribute to sustainable development with its extensive partner network).

Alma Media develops its responsibility in compliance with the legislation governing business activities and the media industry. The development of corporate responsibility is guided by the company's policies, guidelines and commitments as well as guidelines defined by external parties that are significant to the Group's operations.

Good governance

- The corporate sustainability programme and its targets
- Code of Conduct
- Disclosure policy
- Insider guidelines
- Procedures for related party transactions
- Remuneration principles and remuneration policy
- Tax policy
- Investment and financing policy
- Procurement policy
- Data security policy
- Data protection guidelines and principles
- Continuity plan
- Contractual terms and terms of sale concerning the advertising customers of Alma Media's media sales

Environmental responsibility

- The Group's climate targets based on the Science Based Targets initiative
- The UN Global Compact initiative and the Sustainable Development Goals of the UN

Social responsibility

- Equality and non-discrimination principles and equality and diversity plans
- Career development principles
- The Board of Directors' diversity policy

Journalistic content

Guidelines created by external parties:

• The Council for Mass Media Guidelines for Journalists and basic agreement

Media and marketing

- The marketing code of the International Chamber of Commerce
- Principles concerning good marketing practices
- Europe-wide self-regulation of targeted online advertising (so-called OBA self regulation)
- Guidelines by the IAB digital marketing network, including the IAB Europe Transparency & Consent Framework v2.0 (TCF)

Management of sustainability and responsibility at Alma Media

Alma Media's Board of Directors discusses corporate sustainability goals and the action plan when assessing the risks related to the business, deciding Alma Media's sustainability efforts are guided by the Group's core values as well as the Sustainable Development Goals (SDG) of the UN that are the most relevant to its business.

on annual renumeration principles and when approving the Group's statement of non-financial information. The company's Management Team leads the development of responsibility, sets the targets of the sustainability programme and is responsible for monitoring progress.

Business unit management and key employees in the Group's procurement function, HR management, legal department and ICT are responsible for the practical implementation of the sustainability programme. The development of the sustainability programme in the Group Executive Team is coordinated by the Senior Vice President, Communications and Brand, supported by the corporate communications team. Business functions are supported in the setting of objectives to different areas and the achieving of the sustainability targets, implementation of projects and development work as well as communications.

Management of risks related to sustainability and responsibility

Alma Media's risk management is described more comprehensively in the Report by the Board of Directors that also covers sustainability and responsibility risks, whose significance is assessed both in financial terms and in terms of the potential damage caused to the Group's reputation. The Group communicates its sustainability risks and challenges transparently to company stakeholders..

Stakeholder interaction

Interaction with significant stakeholders, employees, customers, investors and cooperation partners is a natural and important part of Alma Media's business.

Alma Media also manages its stakeholder relationships by being involved in cooperative bodies and associations. The Group's most significant memberships

include the Confederation of Finnish Industries EK, the Central Chamber of Commerce, the Advisory Board of Finnish Listed Companies, the Finnish Media Federation (Finnmedia), the digital marketing and advertising growth-promoting organisation IAB Finland, the FIBS corporate responsibility network, the City of Helsinki Climate Partners network and the Responsible Media Forum. The goal is to engage in equal dialogue with other parties and to anticipate changes related to the industry and corporate sustainability. In addition to these, many members of Alma Media's Group Executive Team and managers and experts hold board memberships in the Media Industry Research Foundation of Finland, Finnish Media Federation, the Finnish Periodical Publishers' Association and Media Metrics Finland. Alma Media is also a member of INMA (International News Media Association) and ICMA (International Classified Marketplace Association).

During the year under review, Alma Media's most important social partner in Finland was the Finnish Children and Youth Foundation, with which the Group has a key partnership agreement. As a media company, it is important for Alma Media to maintain its impartiality and independence with respect to various stakeholder interests.





Summary of Alma Media's key sustainability targets

	KPI	Target	Result 2022	Objectives 2023
Responsible journalism: journalism marketing	Condemnatory decisions issued by the Council for Mass Media	<5 condemnatory decisions issued by the Council for Mass Media regarding Alma Media's media	2 condemnatory decisions for Iltalehti	<5 condemnatory decisions issued by the Council for Mass Media regarding Alma Media's media
	Adherence to the International Chamber of Commerce's guidelines on good marketing practices	0 advertisements in violation of good marketing practices in the Group's media and services	0	0 advertisements in violation of good marketing practices in the Group's media and services
Ethics in business: employees subcontracting	Adherence to Alma Media's updated Code of Conduct among the Group's employees and in the subcontracting chain	Rate of completion of Code of Conduct training among the Group's employees	100% of the employees	100% of the employees
		Most significant subcontractors commit to Alma Media's Code of Conduct	73 per cent of the most significant subcontractors completed the company's Code of Conduct training.	90 per cent of the most significant subcontractors have completed the company's Code of Conduct training.
Data security and data pro- tection	Alma Media's services offer a high standard of data security for users, and customer data is processed in a diligent and legally compliant manner	There are no serious data privacy breaches in the services for which the authorities would impose a fine	0	0 serious data privacy breaches
Good employer	Alma Media's QWL (Quality Worklife) employee survey	> 83%	83.1%	83% QWL index
Environmental responsibility: Own operations (Scope 1 & 2) Subcontracting chain (Scope 3)	CO2 emissions arising from the consumption of electricity, district heating and district cooling and the energy consumption of company cars	-52% (2019–2030)	-9.2% (Scope 1 & 2)	-4.3% (Scope 1 & 2)
	Indirect CO2 emissions caused by the subcontracting chain	-14% (2019–2030)	+8.2% (Scope 3)	-1.23% (Scope 3)

Business ethics

Alma Media does not condone the use of unethical business practices by its employees or suppliers. The Group condemns corruption and bribery. These and other key ethical principles are documented in the company's Code of Conduct, which is the foundation of the Group's responsible business. The digital Code of Conduct training is part of employee induction, and 100 per cent of Alma Media's employees in 11 operating countries have completed the Code of Conduct training. The most significant subcontractors are also required to complete the Code of Conduct online training intended for subcontractors and partners. Alma Media does not receive or grant political or other contributions that could compromise its independence. Alma Media's media brands grant discounts on advertising to non-profits and non-governmental organisations as well as parties and candidates in election advertising, but the terms of the discounts are the same for everyone. Alma Media has a zero tolerance policy for unethical business conduct. Alma Media's employees and stakeholders have access to a whistleblowing channel for anonymously reporting any suspicions of misconduct. The Group's executive management is responsible for the regulatory compliance, ethicality and

Table 1: Business ethics

Definition 2022	Progress made in 2022	Definition 2023
Alma Media does not condone the use of unethical business practices by its employees or suppliers, condemns corruption and bribery and requires commitment to the Group's Code of Conduct.	We implemented Alma Media's updated Code of Conduct training course for our employees in 11 languages in 11 European countries.	Alma Media does not condone the use of unethical business practices by its employees or suppliers, condemns corruption and bribery and requires commitment to the Group's Code of Conduct.
Strategic intent		Strategic intent
Alma Media's employees and subcontractors have taken the Group's Code of Conduct training and committed to observing it in everything they do.	We designed and implemented a Supplier Code of Conduct training. We required all new Alma employees to take the Alma Code of Con- duct training.	There are no violations of the Group's Code of Conduct amongst the company's employees or its subcontracting chain.
Objectives for 2022:		Objectives for 2023:
Alma employees in all the countries of operation complete the updated Code of Conduct training.	By the end of 2022, 100 per cent of Alma employees had completed the Group's updated Code of Conduct training.	All Alma employees in all 11 countries, including new employees, have completed the updated Code of Conduct training.
50 per cent of the company's most significant suppliers in the subcon- tracting chain are committed to complying with Alma Media's Code of Conduct.	Alma Media required all of its key subcontractors to commit to com- pleting the Supplier Code of Conduct training. By the end of 2022, 73 per cent of the most significant suppliers on the basis of the value of the purchases in the 11 operating countries had completed the Supplier Code of Conduct training.	90 per cent of Alma Media's most significant subcontractors are com- mitted to the company's ethical guidelines by completing the Supplier Code of Conduct training.
The whistleblowing channel informs the company of any potential misconduct in the Group.	The whistleblowing channel is available in all Alma Media's operating countries in 11 languages.	The whistleblowing channel informs the company of any potential misconduct in the Group.
There are no incidents of corruption, bribery or human rights violations in the Group or in its subcontracting chain.	There were no incidents of corruption or anti-competitive behaviour at Alma Media in 2022. The company is not aware of any ongoing official investigations related to Alma Media.	Risk management will be improved further by reviewing the risk profile in Alma Media's operating areas and, if necessary, by enhancing com- munications and training.

transparency of business operations. The whistleblowing team, consisting of representatives of Group management, receives the notifications and reports them to the Audit Committee of the Board of Directors. Violations of the Code of Conduct result in the necessary measures and, if necessary, the termination of employment. During the year under review, the Group was informed of three suspected Code of Conduct violations through the whistleblowing channel.

There were no incidents of corruption or anti-competitive behaviour at Alma Media in 2022. Furthermore, the company was not the subject of any reprimands from the authorities or rulings pertaining to non-compliance with laws and regulations governing social and economic responsibility. As a result, there were no financial losses arising from legal action.

Alma Media's business is built on the foundation of consumer and advertiser trust in the Group's content and services, and the company's credibility as an independent, reliable and responsible operator must not be compromised. The Group's media did not receive any governmental or private subsidies or assistance to fund their operations.

Alma Media's tax footprint in 2022

Alma Media reports its tax footprint annually to ensure the transparency of its operations. The Group's tax policy is to pay taxes in the country where the result is generated. Alma Media's services are the leading services in their segments in many of the Group's countries of operation and they are also perceived as attractive employers. They support economic activity in their communities by paying taxes and purchasing products and services from their subcontractors.

The Group complies with the current legislation, tax instructions and international transfer pricing guidelines in its operations. The corporate income tax rates in Alma Media's operating countries vary from 10 per cent in Bosnia and Herzegovina to 21 per cent in Slovakia. Alma Media did not receive any subsidies from public or private sources in the review year. The value creation model on page 21 of the Report by the Board of Directors describes the added value created by Alma Media to its stakeholders.

Development projects during the year

During the year under review, Alma Media implemented the Code of Conduct online training aimed at

taxes	Suomi	Tsekki	Slovakia	Baltia	Ruotsi	Muut maat	Yhteensä
Corporate income tax	2.6	4.0	1.6	1.0	0.7	1.0	10.4
Effective tax rate	19.5%	19.5%	21.8%	20.0%	20.7%	17.1%	20.6%
Employer contributions	1.6	4.1	1.0	0.8	0.3	0.8	8.8
Other paid taxes	0.0	1.7	0.0	0.0	0.0	0.0	1.7
Payed taxes total	4.3	9.7	2.7	0.2	1.0	1.8	21.0
Net VAT	19.7	11.3	2.9	1.7	1.1	2.6	39.3
Employer taxes	20.6	0.0	0.7	0.7	0.3	0.7	23.0
Other collected taxes	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Collected taxes total	40.2	11.3	3.6	2.4	1.4	3.3	62.2
Collected and payed taxes total	44.5	21.1	6.3	4.0	2.3	5.1	83.2

subcontractors and partners. By the end of 2022, 73 per cent of Alma Media's most significant suppliers in the 11 operating countries had completed the Code of Conduct training.

Collected and paved

Focus areas for the development of sustainability in 2023

In 2023, the company will continue to encourage its subcontractors to commit to the Code of Conduct aimed at Alma Media's suppliers. The aim is also to require the company's new subcontractors and partners to commit to the completion of Alma Media's Supplier Code of Conduct training when concluding a cooperation agreement. Furthermore, risk management will be improved by reviewing the risk profile in Alma Media's operating areas, and if necessary, communications and training will be enhanced. Alma Media has defined the key areas of the company's sustainability and responsibility and the related target values or KPIs. The Group's sustainability targets are also part of the incentive criteria for all Alma employees, in addition to the financial targets.

Climate change

For two decades, Alma Media has systematically and successfully implemented a strategy based on the digital transformation of business. During the past six years, Alma Media has halved the greenhouse gas emissions arising from its own operations. The production and distribution of digital content and services is not only more environmentally friendly but also more cost-efficient compared to print products. The transition from print to digital has been reflected in improved profitability and increased adjusted operating profit. The decision to invest in digital business has also mitigated the company's short and medium-term risks related to climate change. At the same time, the transition to low-carbon society has created business opportunities and increased resource efficiency. Thanks to the digital transformation, Alma Media has been able to reduce its emissions and optimise its distribution routes and production both in terms of energy use and materials. The production of digital content and services involves substantially lower consumption of materials and electricity compared to the print business. The cloud services and telecommunication services used for data management in Alma Media's Finnish operations are produced primarily from renewable energy or the emissions are compensated.

In 2022, digital sources accounted for 80 per cent, or approximately EUR 250 million, of Alma Media's business. The Group's annual capital expenditure under the digital business model amounts to approximately EUR 3–4 million. The transition from print to digital was a significant factor affecting the Group's improved profitability in 2016–2022.

Management of environmental responsibility

In 2018, Alma Media was the third media company in the world to publish approved, science-based climate targets. Thanks to significant changes in the business operations, the SBT for 2025 based on the 2016 baseline was achieved ahead of schedule and the company wanted to update and significantly tighten its climate targets.

Emissions reduction 2016–2022 Scope 1 & 2 and Scope 3





The figures may differ from those previously reported due to the calculation method in accordance with the SBTi 1.5C validation, the revised emission coefficients and the revised calculation values.

The carbon footprint of Alma Media's own operations is small, and only four per cent of the greenhouse gases arising from the Group arise in the Group's own operations, while 96 per cent arise in the subcontracting chain. In June 2022, the Science Based Targets (SBT) organisation approved Alma Media's new science-based climate targets. Alma Media is committed to reducing its absolute Scope 1 and Scope 2 greenhouse gas emissions by 52 per cent and the emissions of its subcontracting chain by 14 per cent by 2030 compared to 2019. The SBTi initiative aims to limit global warming to 1.5°C. Emission reductions in accordance with Alma Media's plan will focus particularly on reducing emissions from company cars, electricity, district heating and cooling in business premises, and on magazine printing, logistics and ICT procurement in the subcontracting chain.

Alma Media's Board of Directors monitors the company's progress towards the environmental responsibility targets specified in the sustainability programme. The key employees, together with the management team, plan and decide on the actions to be taken. Alma Media or its business units were not subject to any penalties or reprimands for non-compliance with environmental laws and regulations in their operating countries during the year under review. The climate target is one of the common incentive criteria for Alma Media's management and employees.

Achievement of sustainability targets in 2022

According to the SBTI target set by Alma Media in 2022, the company must reduce its greenhouse gas emissions caused by electricity, district heating, district cooling and fuel consumption by 4.3 per cent annually and by 52 per cent by 2030. Indirect greenhouse gas emissions from procurement must decrease by 14 per cent by 2030 and by 1.23 per cent annually. Progress with respect to the latter target is reported on page 21 / 160 (Supply chain sustainability). To improve the reliability and continuity of emission calculations, Alma Media adopted the International Energy Agency IEA's country-specific emission coefficients in 2021 for instances where an energy producer-specific emission factor is unavailable, and emission figures were retrospectively recalculated according to this decision. The figures for 2019–2022 have also been adjusted to only reflect the Group's continuing operations. The reporting of environmental figures covers all of Alma Media.

In 2022, the Scope 1 and Scope 2 emissions reported by the company decreased by 9.3 per cent compared to 2021. Compared to the level of 2019, the

Greenhouse gas emissions from electricity, fuel consumption, district heating and cooling will be reduced by 52 per cent by 2030.

Table 2: Alma Media and the

environment	Unit	2019	2020	2021	2022
Amount of energy					
Fuels	GJ	6,151	3,946	3,634	3,380
Electricity	GJ	7,455	5,991	5,414	5,429
District heating and district cooling	GJ	4,955	3,880	6,071	5,423
Emissions					
Direct emissions (Scope 1)	tC02-eq				
Fuels		420	264	240	217
Indirect emissions (Scope 2)	tCO2-eq				
District heating, district cooling and electricity, mar- ket-based		375	291	250	228
District heating, district cooling and electricity, loca- tion-based		494	349	411	386
Share of renewable energy, Scope 1 and Scope 2		28%	36%	49%	53%
Share of renewable energy, Scope 2		42%	49%	63%	68%
Scope 3	tCO2-eq	17,338	13,964	14,996	16,222

change is -44.1 per cent. The purchasing of zero-emission hydropower electricity continued in Finland in 2022.

Table 2 on the last page describes the amounts and development of own energy, direct greenhouse gas emissions (Scope 1) and indirect greenhouse gas emissions (Scope 2) in the Group's continuing operations. The energy consumption of the properties under the company's control amounted to 3,013 MWh of electricity, district heating and district cooling. Renewable energy accounted for 68 per cent of this. The energy consumption of the cars owned and used by the company decreased by 6.9 per cent compared to the previous year. The decrease in the energy consumption of company cars was due to

an increase in remote work and remote meetings in business operations as well as the renewal of the car fleet towards a lower-emission, more energy-efficient direction. Alma Media calculates the consumption of electricity, district heating and district cooling mainly at the company's Finnish properties based on the invoices issued by the energy companies. The same practice is used in the other operating countries where consumption data is available. If the data is not available and if energy is included in the monthly rent for the property, electricity consumption is calculated based on the floor area. In the business activities in Finland, electricity is hydropower-generated, emission-free and renewable. With regard to the head office in Finland, the procurement of district

heating and cooling produced with renewable energy was continued in 2022.

The energy consumption data for Alma Media's company cars and cars that fall under an unlimited car benefit has been primarily collected from service providers. The calculation of emissions is based on actual energy consumption where purchased energy types are multiplied by energy type-specific emission coefficients for each country of use. Scope 1 emissions consist primarily of carbon dioxide emissions (CO₂). When possible, Alma Media utilises the energy supplier-specific emission figures in the calculation of Scope 2 emissions using the market-based method. If such figures are not available, the Group uses the country-specific IEA

emission coefficients that are also used as the basis of location-specific emission calculations. In 2022, the Group's greenhouse gas emission intensity was 0.2 tCO₂-eq per employee. Alma Media calculates its greenhouse gas emission 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 greenhouse gas emissions caused by the electricity, district heating and district cooling consumption of properties decreased by 9.3 per cent from the comparison year to 228 tCO₂-eq, calculated using the market-based method. Energy consumption is measured using specific emission coefficients based on country, type and supplier.

Table 3: Climate change

Definition 2022	Progress made in 2022	Definition 2023
In accordance with the 1.5°C limit SBTi target set in 2022, the green- house gas emissions from the company's activities (Scope 1&2) must be reduced by 4.3 per cent annually and by a total of 52 per cent by 2030. In the subcontracting chain (Scope 3), reduction of greenhouse gas emissions by 1.23 per cent annually and by a total of 14 per cent by 2030 compared to 2019	Alma Media's science-based climate target was formally approved by the SBTi organisation in June 2022. Annual Scope 1, 2 & 3 targets set for the company's operations and subcontracting chain were achieved.	In accordance with the 1.5°C limit SBTi target set for 2030, the green- house gas emissions from the company's activities (Scope 1&2) must be reduced by 4.3 per cent annually and by a total of 52 per cent by 2030, compared to 2019.
Strategic intent:		Strategic intent:
Minimising the greenhouse gas emissions arising from the Group's own operations. An industry leader in the transition to low-carbon business operations and climate change mitigation.		Minimising the greenhouse gas emissions arising from the Group's own operations. An industry leader in the transition to low-carbon business operations and climate change mitigation.
Objectives for 2022:		Objectives for 2023:
Reduction of direct (Scope 1&2) emissions by 4.3 per cent annually and by 52 per cent by 2030 (real estate, energy, company cars).	In 2022, direct (Scope 1&2) greenhouse gas emissions decreased by -9.3 per cent compared to 2021 and the decrease compared to 2019 was -44.1 per cent	Reduction of direct (Scope 1&2) greenhouse gas emissions by 4.3 per cent compared to 2022 (real estate, energy company cars) and decrease compared to 2019 52 per cent in total by 2030
Reduction of indirect (Scope 3) greenhouse gas emissions in the sub- contracting chain by 1.23 per cent by 2021 and by 14 per cent from 2019 to 2030.	Indirect (Scope 3) greenhouse gas emissions increased by +8.2 per cent compared to 2021 and decreased by a total of -6.4 per cent com- pared to 2019.	Reduction of indirect (Scope3) greenhouse gas emissions by 1.2 per cent annually and by 14 per cent by 2030



Management of risks related to climate change

Alma Media applies a business-oriented and holistic approach to risk assessment and management, and climate-related risks are included in this process. The risk identification process is the same for short, medium and long-term risks. All business areas and most of the business-critical functions are included in a company-wide, consolidated risk management process. In the matrix, the risks and parameters are assessed on a scale of low to medium to high. Each risk undergoes a qualitative assessment of likelihood and consequences. The assessed results are placed in the risk matrix. The company considers the risk substantial when the probability of the risk materialising within 6 months is high and the net losses are more than EUR 10 million (high risk).

The group in charge of the finances of the business segments is responsible for developing the segment's risk matrix. The director of the ICT organisation also compiles a risk matrix because safe, fast and reliable ICT operations are critical for the company's business and ICT can opt for digital solutions to replace more energy-intensive solutions. In the Group's risk matrix, the most significant risks and uncertainties, as well as the related material changes and responses to them, are reported by the CFO to the Audit Committee of the Board of Directors. The Board of Directors of Alma Media processes the Group's most significant risks and uncertainties. The Board of Directors reports on the most significant risks and uncertainties and any material changes in the company's half-year and interim reports. The CFO coordinates the risk management process and performs the risk identification and risk management specification and is responsible for the implementation together with the business operations and ICT. All employees must know and manage the risks in their area of responsibility.

Alma Media has identified risks related to climate change that may have a significant financial or strategic impact on the company's business. Alma Media manages its environmental risks by systematically developing its operations in accordance with the Group's SBTi climate targets and by engaging in active environmental dialogue with its key suppliers. The environmental risks associated with purchasing are reduced by Alma Media operating in 11 European countries. The procurement of each country unit is focused on the domestic market or nearby regions, which enables comprehensive oversight of suppliers.

Risks and opportunities related to climate change

Examples of risks and opportunities related to climate change in Alma Media's business operations include tighter regulation of companies at the EU level and changes in carbon pricing mechanisms. Climate change is likely to have a wide-ranging impact on consumer behaviour, and Alma Media must adapt to these changes in order to remain competitive in the market. As consumers become more aware of the environmental impacts of their consumption habits, they may be more likely to make choices that are more sustainable or environmentally friendly. In addition, climate change may change consumer behaviour by influencing the availability and price of certain products, which may also lead to changes in customer advertising and marketing.

Extreme weather events caused by climate change, such as floods and the resulting landslides, are estimated to increase the risk of digital service disruption in Alma Media's operating countries to some extent. The risk of disruptions in the availability of digital services is mitigated by improving operational reliability. Reliability has been improved by moving all of the services that are important to Alma Media's business to cloud services. Other server capacity needed by the Group is purchased from modern data centres maintained by subcontractors.

In addition to the risks, the company has also identified opportunities related to climate change in business, the most important of which is the digital transition. Consumers' growing interest in the use of digital services in larger purchases as well, such as in connection with home and housing or driving and mobility, increases Alma Media's business opportunities. The increased use of low-emission energy sources is also an opportunity in Alma Media's business and creates cost savings for the company.

Alma Media's services reach the majority of consumers in their operating areas and are the market leader in 11 countries. 80 per cent of the business is already based on digital business models that are highly scalable and, thus, enable the development of additional services and entirely new digital business in the transition to a low-carbon society.

Alma Media follows the international recommendations of TCFD (Task Force on Climate-related Financial Disclosure) on the reporting of the Group's risks and opportunities related to the climate. Alma Media's climate risk table in accordance with TCFD is shown on page 42 of sustainability report and on 181 of the Annual Report.

Focus areas for the development of environmental responsibility in 2023

After the Russian invasion of Ukraine in February 2022, Finland, together with the rest of Europe, faced an energy crisis. Russia began to blackmail Europe with its energy assets, and during the spring and summer, imports of electricity, wood chips, pipeline gas, coal and oil from Russia ceased. Electricity prices, in particular, were at times very high due to the crisis, but historically high prices were paid for almost all forms of energy. However, the dependence of Finland and Alma Media's operating countries on natural gas was lower than in the rest of Europe. The terrible war in Ukraine has forced the whole of Europe to innovate and renew itself in the field of energy. Renewable energy, hydrogen, new technologies and energy efficiency have transformed from a possibility to a reality in almost all of the company's operating countries.

In 2023, Alma Media will continue to focus on minimising the carbon footprint of its own operations and reducing emissions in its subcontracting chain, as well as on strengthening the climate-friendly impacts of its own operations. Alma Media's SBTi target means an annual reduction of at least 4.3 per cent in greenhouse gas emissions caused by its own operations and a reduction of at least 1.2 per cent in the emissions of the subcontracting chain.

Alma Media will continue to require the company's most significant service providers to commit to the climate targets and the implementation of the company's Code of Conduct. The renewal of the company's car fleet in a lower-emission, more energy-efficient direction will be continued in all operating countries. Alma Media's operating countries in Eastern Central Europe are also engaged in an active dialogue with the landlords of the premises on the possibilities of ensuring the use of low-emission and renewable energy. Various measures are taken to ensure that cooperation to mitigate climate change, promote sustainable consumption and ethical good governance in business is sufficiently ambitious, comprehensive and effective.

Supply chain sustainability

Development and focus areas of supply chain sustainability in 2023

Alma Media's updated, science-based climate targets were approved in June 2022. Achieving the Group's SBTi target requires a reduction of greenhouse gas emissions arising from the subcontracting chain by 14 per cent by 2030 compared to 2019. According to this target, the emissions arising from the subcontracting chain must decline by 1.23 per cent annually. The emission reduction target mainly applies to the Group's printing and logistics procurements and the procurement of ICT services.

In addition to the dialogue with its key subcontractors regarding the reduction of greenhouse gas emissions, the Group engages in regular dialogue regarding the importance of ethically sustainable business. Alma Media's relationships with subcontractors are guided by the Group's Code of Conduct, which unequivocally prohibits corruption, bribery, human rights violations and other inappropriate treatment of employees. In order to develop sustainability in its subcontracting chain, Alma Media required its most significant suppliers during 2022 to commit to complete the Supplier Code of Conduct training designed for

the company's subcontractors and partners, with the aim of committing at least 50 per cent of the significant suppliers. By the end of the year, more than 70 per cent of the company's most significant subcontractors had completed the training and agreed to commit to the Code of Conduct. Alma Media reserves the right to monitor the sustainability of its suppliers by conducting audits at their premises or by requiring documentation regarding the sustainability of the services or products they produce. When the Group signs a significant new subcontracting agreement, a visit is made to the production facility before

Our relations with subcontractors are determined by our ethical guidelines and the Supplier Code of Conduct.

Table 4: Other indirect emissions (Scope3)	tCO2-eq 2019	2020	2021	2022
Purchased products and services (category 1)	13,304	10,385	11,871	13,057
Capital goods (category 2)	0	0	0	0
Fuel production and energy transmission losses not included in Scope 1 or 2 (category 3)	183	124	138	128
Product transport and service (upstream, category 4)	3,476	3,257	2,778	2,764
Business travel (category 6)	165	23	37	103
Commuter traffic (category 7)	81	63	65	72
Disposal of products sold (category 12)	93	74	67	58
Investments (category 15)	36	38	39	39
Total Scope 3 emissions according to SBTi 1.5C validation	17,338	13,964	14,996	16,222
Use of products sold (category 11)	212	158	141	135

These Scope 3 categories have been reviewed in the validation but are not relevant to Alma's business.

- 5. Waste (reported as service purchases)
- 8. Leased property
- 9. Transportation and distribution (Downstream)
- reported as service purchases10. Processing of products sold
- 13. Self-leased assets
- (reported as service purchases)
- 14. Franchising

the final choice of supplier. Alma Media was not made aware of any violations of the Group's Code of Conduct among its subcontractors in 2022. Alma Media will continue to engage its most significant suppliers to commit to the company's Code of Conduct in 2023.

The Group's most significant subcontractors are certain ICT, printing and delivery suppliers. Continuous procurement from these suppliers correspond to 46 per cent of the Group's procurements. Correspondingly, the share of procurements related to content

Table 5: Supply chain sustainability

generation of all the procurements made was 12 per cent in 2022. Alma Media units in all of the countries of operation make most of their purchases domestically or from nearby regions where businesses are subject to supervision and regulation. Country-level management is in charge of supply chain sustainability in Alma Media's foreign units. In Finland, the Chief Procurement Officer and the Director in charge of ICT procurement are in charge of developing the sustainability of the procurement policy and Group-level purchasing.

Achievement of sustainability targets in 2022

According to the SBTi emissions target set in 2019 for Alma Media's indirect greenhouse gas emissions primarily caused by procurement (so-called Scope 3 emissions), the company must reduce its emissions by 14 per cent by 2030. The annual emission reductions must be at least 1.23 per cent. Alma Media's indirect greenhouse gas emissions increased by 8.2 per cent in the year under review to 16,222 tCO₂-eq (2021: 14,996 tCO₂-eq). The increase in emissions was due to increased procurement

related to newspaper printing and distribution, for example, as well as increased investments in the development of digital services. However, even in Scope 3 emissions, the company maintained a downward trend in line with the long-term target level for the year 2030. Compared to 2019, the Group's Scope 3 emissions have declined by 6.4 per cent in total.

Alma Media continued to engage in active dialogue with subcontractors to reduce emissions and started development projects with significant

Definition 2022	Progress made in 2022	Definition 2023
Alma Media does not allow unethical business practices in companies included in its subcontracting chain, and the Group also requires that its subcontractors set targets to mitigate climate change.	Alma Media planned and implemented a new ethical guidance for its subcontracting chain, the Supplier Code of Conduct training. The com- pany's Scope 3 emissions decreased by 6.4 per cent compared to 2019.	Alma Media does not allow unethical business practices in companies included in its subcontracting chain, and the Group also requires that its subcontractors set targets to mitigate climate change.
Strategic intent		Strategic intent
Alma Media's subcontracting chain promotes the realisation of the Group's climate target and the ethical conduct of business.		Alma Media's subcontracting chain has, in its part, committed to promoting the achieving of the SBTi target and socially and ethically sustainable business.
Objectives for 2022:		Objectives for 2023:
50 per cent of Alma Media's key subcontractors have committed them- selves to the Group's Supplier Code of Conduct.	Alma Media implemented the new Supplier Code of Conduct training based on the value of its procurements to its most significant subcon- tractors in its 11 operating countries. By the end of 2022, 73 per cent of the most significant subcontractors had completed the training and acknowledged their commitment to the company's Code of Conduct.	90 per cent of Alma Media's most significant subcontractors have committed themselves to the Group's Supplier Code of Conduct by the end of 2023.
According to the company's new SBTi target set in 2022, the green- house gas emissions of the subcontracting chain must be reduced by 1.23 per cent annually. By 2030, the reduction must be 14 per cent compared to 2019.	In 2022, greenhouse gas emissions increased by 8.2 per cent from 2021. However, compared to 2019, the greenhouse gas emissions of the subcontracting chain have decreased by 6.4 per cent.	Reduction of greenhouse gas emissions by 1.2 per cent from 2022.

subcontractors in ICT services, delivery services and printing operations to support Alma Media's new SBTi climate targets. Alma Media's supply chain in Finland consists of 2,000 subcontractors and approximately 3,900 subcontractors in all countries. The largest group comprises small enterprises that primarily provide content production services to Alma Media's editorial offices. The total purchases of the company's subcontracting in 2022 amounted to EUR 98 million. The most significant subcontractor base for the company consisted of approximately 140 suppliers in Finland and abroad, most of the companies providing distribution, printing and ICT services.

Alma Media's procurement function in Finland operates with a two-tier approach. In addition to centralised procurement at the Group level, there are also local purchases. Alma Media's editorial offices, for example, purchase their content production services independently because the production and procurement of relevant content requires a high degree of familiarity with the target audience. During the reporting year, Alma Media's purchases from service providers and suppliers totalled EUR 98 million.

Alma Media's most significant Scope 3 emission intensities are related to the procurement of transport and delivery services as well as the printing of publications. Alma Media reports on its other indirect greenhouse gas emissions in accordance with the international GHG Protocol. An itemisation of the company's Scope 3 emissions is provided in Table 4. Alma Media adopted the International Energy Agency IEA's country-specific emission coefficients in 2022 for those instances where an energy producer-specific emission coefficient has been unavailable. The emission figures for 2016–2022 were retrospectively recalculated according to the IEA factors. The adoption of the IEA calculation guidelines improves the reliability of environmental figures published by Alma Media and enables a continuous comparison. The monitoring of Alma Media's SBTi targets also requires following the IEA standards. Scope 3 emissions consist primarily of carbon dioxide emissions (CO_{a}) .



Data security and data protection

Data security and data protection

Approximately 80 per cent of Alma Media's revenue now comes from digital sources. The company develops its online services in the long term, with the aim of providing consumers and advertisers with safe and versatile services with the best customer experience. It is essential for the success of the Group's business that the users of its digital services feel confident that their customer data is stored, managed and used responsibly.

It is equally important that our customers feel that the services are competitive, effective and pleasant to use. In order to ensure the quality of its digital services, Alma Media focuses its investments on the development of digital business operations that are also supported by actively monitoring changes in data protection and data security regulations as part of the company's risk management, and by strengthening the digital expertise as well as data protection and data security knowledge of its employees. The management of the business units, together with the ICT organisation and the legal department, are responsible for the technical development of the online services owned by the Group and for ensuring that they comply with data protection and data security recommendations and regulations

as well as maintaining the appropriate level of employee competence pertaining to data protection and data security.

Alma Media's business environment is constantly changing, which is why the company regularly reviews the risks affecting data security and the ability to react to the risks of the changing environment. Data security and data protection will be strengthened as necessary in order to reduce risks. In order to mitigate these identified risks (both external and internal threats), entities outside Finland have been integrated into the Group network, which has brought all units under the same data security policies and controls, as well as user and access management. The Group's privacy policy describes the Group's responsibilities, requirements and practices related to the collection, use and storage of data based on the applicable legislation. At Alma Media, users of online services are asked for the necessary permits and the data is primarily used to deliver the service ordered by the user, to develop the user experience and to meet users' expectations. Secondarily, user data is used, for example, on the basis of user interest and behaviour, to target relevant advertising and content.

In digital advertising, Alma Media is committed to IAB's self-regulatory principles and uses the Consent Management Platform (CMP) of the Transparency and Consent Framework. In order to protect the privacy of users, the company complies with the statutory privacy protection obligations. The practices related to ensuring privacy protection and the purposes for which data are used are described in the Group's privacy policy at <u>https://www.</u> <u>almamedia.fi/en/data-privacy/</u>

Achievement of sustainability targets in 2022

Alma Media assesses its performance as a responsible digital operator primarily from the perspective of the users of the Group's services. Accordingly, the Group has selected the security of its service as the focus area of its responsibility efforts. The Group has set two annual targets in this area. In line with the first target, no serious breach of data protection should occur in the company's online services. During the year under review, the company submitted one (1) personal data security breach notification to the data protection authority and received a total of zero (0) requests for clarification. In addition, the company received two (2) requests for clarification from the Finnish Transport and Communications Agency Traficom regarding the use of cookies on the website. The incidents did not result in condemnatory decisions or a sanction

imposed by a decision of the authority. During the year, no legal action was taken against the Group related to the privacy of users.

In the spring of 2022, the Russian invasion of Ukraine increased global political instability and the risk of data breaches. The most important media in Finland, including Alma Media, were targeted by data security breaches. However, serious, long-term service interruptions were avoided and the continuity of data security and data protection was ensured during 2022 as well. Alma Media's second target related to the security of its online services covered the company's business operations in Finland. The target was that Alma Media was to organise at least four training events on data protection and two general training events on information security for its employees each year. The training was organised as planned in 2022.

Other development projects during the year

As the operating environment became significantly more unstable in 2022, Alma Media updated its business continuity plan. The purpose of the continuity plan is to enable business to continue in problematic circumstances by adopting an appropriate strategy and measures to protect people and property. The business continuity plan outlines the potential impacts of disasters on the business and describes the policy related to these situations to ensure the company's rapid recovery after a potential crisis. Due to the changes in the potential threats in spring 2022, Alma Media carried out so-called hardening of the data security controls of critical systems to improve interference tolerance and recovery from disruptions. The response to personal data breaches was enhanced with updated instructions, of which a separate version was also prepared for the company's subcontractors.

Alma Media continued to actively participate in the cybersecurity-related cooperative bodies of ISAC (Information Sharing and Analysis Centre) groups. The data security of the cloud environments used for Alma Media's commercial services was improved in 2022 by enhancing existing data security capabilities and introducing new ones as well as by improving the data security monitoring of Alma's internal network and workstations. Information security and data protection training for employees form a part of the proactive risk management operations involving the Group's employees.

Alma Media undertakes proactive risk management with regard to data security. This can be seen in the form of several data security inspections of the commercial services and the new data security controls implemented in the service development process with regard to vulnerability and software dependency management.

Focus areas for the development of sustainability in 2023

With regard to the current focus areas — data security and data protection resources in 2023 will be particularly allocated to the continued development of managing registered information requests and the Group's monitoring capabilities pertaining to data security. The continuous data protection and data security expertise of the Group's employees will be further strengthened through a digital training platform.

Table 6: Data security and data protection

Definition 2022	Progress made in 2022	Definition 2023
Data security and data protection are the cornerstones of Alma Media's responsibility. We process data carefully, always observing privacy and meeting the expectations of our users. We develop our capability to anticipate and respond in time to ensure data security.	The data security of the cloud environments used for the commer- cial services was improved by enhancing the existing data security capabilities and introducing new ones as well as by improving the data security monitoring of the Group's internal network and workstations.	Data security and data protection are cornerstones of Alma Media's sus- tainability. We process data carefully, always observing privacy and meet- ing the expectations of our users. We develop our capability to anticipate and respond in time to ensure data security.
Strategic intent		Strategic intent
We ensure the safe use of market-leading services and the protection of privacy. With our continuity plan, we aim to avoid serious data secu- rity breaches.		We ensure the safe use of market-leading services and the protection of privacy. With our continuity plan, we aim to avoid serious data security breaches.
Objective for 2022:	Progress made in 2022:	Objective for 2023:
There are no serious personal data breaches in the services for which the authorities would impose a fine on the company.	There were no serious personal data breaches in the services for which the authorities would impose a fine on the company.	There are no serious personal data breaches in the services for which the authorities would impose a fine on the company.
We organise at least four data protection trainings and two data securi- ty trainings for our employees.	We organised at least four data protection trainings and two data se- curity trainings for our employees. In addition, we organised two data protection trainings for software developers, supplemented with an online course.	Continuous training of employees to develop data protection and data security in the changing operating environment.
Improving registered use, customer experience and the reliability of services.	The number of registered Alma IDs increased by nearly 500,000 to 1,900,000 in 2022. We developed the automation of the access to the reg- istered user's own data, and the work continues. We mapped out a solution for measuring customer experience and implementation starting in 2023.	The amount of monthly active use of the Alma ID is on the rise. The cus- tomer satisfaction of Alma Media's largest media and services has been measured (NPS) and the results are in. We will define the development actions based on the measurement during 2023.
Proactive development of data security and data protection to prepare for data security attacks.	We improved the resilience of our systems and recovery from dis- ruptions. We updated the guidelines for responding to data security breaches.	We invest in the further development of the management of data requests from registered users and the data security monitoring capabilities. We will further strengthen our employees' data protection and data security expertise through a digital training platform.
There is no downtime in our services.	When the Russian invasion of Ukraine began, there were some inci- dents of downtime in our media. However, serious long-term interrup- tions were avoided.	There are no serious long-term interruptions in our services.

Diversity, equality and inclusion

The foundation for Alma Media's development of an equal and diverse work community is provided by regular employee surveys, among other things. The survey results, salary analyses and other employee data are used as the starting point when Alma Media's Finnish business units update their non-discrimination, diversity and equality plans in twoyear intervals under the guidance of the HR function. The plans cover topics such as differences in pay, the justification for fixed-term employment relationships and the job-specific gender distribution in each unit. Alma Media recruits new employees purely based on their competence and aptitude. All Alma Media employees have the right to:

- fair and incentive pay;
 - competence development;
- feedback;
 - information about the company;
- a safe, comfortable, renewing and evolving work environment; and
- respect for privacy and private life.

In accordance with the company's Code of Conduct, everyone at Alma Media must respect basic human rights. Alma Media does not condone discrimination based on age, gender, race, skin colour, nationality or ethnic origin, religious beliefs, convictions, family relationships, sexual orientation or disabilities. Alma Media has a zero tolerance policy concerning sexual harassment and other forms of harassment, threats, offensive conduct, physical and psychological violence as well as workplace bullying. Every Alma Media employee has an obligation to report any observations of discrimination. Such incidents can be reported internally through employee representatives, Group HR or the anonymous Whistleblow channel. Alma Media's whistleblowing team receives the notifications, reports them to the Audit Committee of the Board of Director and takes action as necessary. Building an inspiring, inclusive, equal and diverse work community is a shared goal for all Alma Media employees. Development in this area is supported by the Group HR function.

Achievement of sustainability targets in 2022

Alma Media has a zero tolerance policy regarding the discrimination and inappropriate treatment of employees. The Group reports annually on whether any such incidents have occurred. A total of

Table 7: Diversity, equality and inclusion

Definition 2022	Progress made in 2022	Definition 2023
Alma Media's employees feel that the Group promotes equality, diver- sity and sense of inclusion. All types of harassment, discrimination or bullying are prevented efficiently, and any shortcomings are corrected swiftly.	Alma Media's Code of Conduct strictly prohibits all discrimination and harassment at the workplace. Each Alma employee must complete a Code of Conduct training. 100 per cent of the employees completed the training.	Alma Media's employees feel that the Group promotes equality, diver- sity and sense of inclusion. All types of harassment, discrimination or bullying are prevented efficiently, and any shortcomings are corrected swiftly.
Strategic intent:		Strategic intent:
A positively developing experience of the realisation of equality, diver- sity and inclusion in the work community.		A positively developing experience of the realisation of equality, diver- sity and inclusion in the work community
Objectives for 2022:		Objectives for 2023:
Zero tolerance against harassment and discrimination: There are no incidents of improper treatment amongst Alma Media's employees.	A total of six (6) suspected incidents of misconduct were reported in 2022. The incidents were investigated and closed by the end of the year.	Zero tolerance against harassment and discrimination: There are no incidents of improper treatment amongst Alma Media's employees and any incidents reported are handled.
Promoting diversity and inclusion in the work community. We will conduct a survey about the experiences of the realisation of diversity and inclusion in the work community. An action and training plan to enhance diversity and inclusion will be prepared based on the survey results.	The realisation of diversity and inclusion in the work community was surveyed in late 2022. The survey was answered by 40 per cent of Al- ma's employees in 11 countries. Unit-specific action and training plans based on the results are in the works.	We will implement action and training plans based on the survey con- ducted in 2022 to strengthen equality, diversity and inclusion.

six (6) suspected incidents of bullying or sexual harassment were reported in 2022. All of the incidents reported to the company were thoroughly investigated. The necessary measures were taken and all six cases were closed by the end of the year. Alma Media was not subject to any reprimands or penalties by the authorities due to discrimination during the year under review.

Alma Media's Board of Directors had eight members in 2022. Two (25%) of them were women. The average age of the Members of the Board was 52 years. Alma Media's Group Executive Team consisted of 10 members during the year under review, three (30%) of whom were women. The average age of the Group Executive Team was 55 years. Women accounted for 38 per cent of supervisors in

Czech Republic432257Baltic countries: Estonia, Latvia, Lithuania755055Slovakia124188Croatia955055Bosnia475055Sweden16010Other132575	Table 8: Alma Media's employees	Employees	Women as managers, %	Men as managers, %
Baltic countries: Estonia, Latvia, Lithuania75505Slovakia124188Croatia95505Bosnia47505Sweden16010Other132575	Finland	1,029	45	55
Slovakia124188Croatia955055Bosnia475055Sweden16010Other132575	Czech Republic	432	25	75
Croatia 95 50 5 Bosnia 47 50 5 Sweden 16 0 10 Other 13 25 75	Baltic countries: Estonia, Latvia, Lithuania	75	50	50
Bosnia 47 50 5 Sweden 16 0 10 Other 13 25 75	Slovakia	124	18	82
Sweden 16 0 10 Other 13 25 75	Croatia	95	50	50
Other 13 25 75	Bosnia	47	50	50
	Sweden	16	0	100
Total 1,831 38 6	Other	13	25	75-
	Total	1,831	38	62

Table 9: Employee

the Group as a whole and 45 per cent of supervisors in Finland. A more detailed distribution of employees is provided in Table 8.

Over 90 per cent of Alma Media's employees were permanently employed during the year under review. Most of Alma Media's employees worked full time. A special feature of Alma Media's Finnish operations was — as in previous years — the use of freelancers by the Group's media brands. Each year, the Group's media brands employ dozens of photographers and journalists by way of freelance contracts in addition to their in-house resources. The media brands order stories, videos and photos from the freelancers based on their needs. In the year under review, the largest age group in all of Alma Media's country units was 30–50. In Finland, the proportions of employees aged under 30 and over 50 were almost equal. In the other operating

countries, the second-largest age group was employees under 30 years of age. More detailed region-specific information on employment contract types, the age distribution and the duration of employment is provided in Table 9.

Other development projects during the year

The objective of Alma Media's HR strategy is to support the development of the Group's business and the execution of strategy. During the past few years, the Group has particularly focused on enhancing the digital competencies of its employees and creating an employer image and employee experience of Alma Media as a responsible employer with a strong capacity for renewal.

In order to develop an equal and diverse work community during the year under review, Alma Media surveyed employees' experiences of diversity, equality and

age distribution and contract type	under 30 years	30–50 years	over 50 years	Fixed- term	Permanent	full- time	part- time	All total
Baltic countries	17%	76%	7%	0%	100%	93%	7%	100%
Bosnia and Herzegovina	21%	77%	2%	32%	68%	100%	0%	100%
Croatia	13%	84%	3%	0%	100%	89%	11%	100%
Other operating countries	15%	85%	0%	8%	92%	100%	0%	100%
Sweden	19%	75%	6%	6%	94%	88%	12%	100%
Slovakia	19%	78%	3%	1%	99%	97%	3%	100%
Finland	18%	62%	20%	7%	93%	88%	12%	100%
Czech Republic	15%	82%	3%	9%	91%	85%	15%	100%

inclusion in all Alma Media's operating countries. A total of 596 people responded to the survey, and the response rate was 40 per cent. Based on the survey responses, employees have equal opportunities to develop their skills and Alma is seen as a flexible employer in different life situations. Based on the results, Alma employees perceive the work community as equal. The results will be used in the development of these themes.

We continued to coach our employees in workshops aimed at increasing employee appreciation towards diversity and viewing diversity as a resource. By the end of 2022, 700 Alma employees had participated in these workshops. We also adhered to our multi-location work principles, which facilitate and increase flexibility in combining individual life situations and work, and improve well-being at work. As part of Alma Media's Code of Conduct package, the Group's principles and operating model to prevent harassment and bullying were implemented in all of Alma's operating countries. During 2022, we offered our employees the opportunity to increase their competence in diversity and inclusion through online coaching. Alma Media participated in Pride Week in June, and the colours of the rainbow were seen in Alma's offices, Teams wallpapers and social media channels. In addition, for Pride month, Alma offered two trainings open to

everyone on the theme in Alma's digital training service, Seduo: 'The basics of rainbow communications' and 'A great team is an inclusive team'.

Focus areas for the development of sustainability in 2023

Alma Media is committed to building a pluralistic and pro-diversity organisational culture by providing all employees with equal rights and opportunities and by treating everyone equally. In 2023, based on the results of a survey conducted in 2022, the company will plan measures to further develop equality, diversity and inclusion. The significance of diversity will be emphasised in communications to supervisors and in supervisor and work community development training in 2023. An extensive DEI training package will be implemented for Alma HR in all operating countries to support the development of sustainability work.



Future-fit workforce

Developing competence and well-being

In a constantly changing operating environment, competence development plays a key role in ensuring future competitiveness. Alma Media's HR strategy supports the Group's business through the goal-driven development of employee competence, amongst other things. Alma Media's goal-driven competence development is based on competence targets, which are defined at the team level at a minimum.

The Group's aim is to have a personal plan prepared for each employee to support the development of their competence. Goal-driven competence development is followed up on in one-on-one discussions between the supervisors and employees. Alma Media arranges training programmes that support the development of employee competence and invests in the collaborative learning of employees and knowledge sharing by organising mentoring programmes, competence workshops and theme events, amongst other things. The company takes a long-term approach to the development of managerial work and builds an international network of supervisors to support the sharing of

best practices related to leadership and management.

The development of employee competence and well-being at Alma Media is supported by the Group HR function. Its tasks include the steering, prioritisation and specification of functions and processes related to pay, benefits, employee reporting and competence development.

Together with occupational health, Alma Media regularly organises webinars to promote the well-being of its employees. Information and tips for building a healthy everyday life are shared, for example, in terms of ergonomics, recovery, sleep, mental well-being and interaction. The well-being of the employees is supported by occupational health care and the **Auntie** service. Auntie is a low-threshold psychological well-being service aimed at reducing stress, improving employees' ability to cope, increasing efficiency and providing concrete tools for managing one's daily life.

Achievement of sustainability targets in 2022

Alma Media measures its performance in engaging the commitment of employees

and competence development by means of annual employee surveys, which provide a comprehensive picture of employee perceptions regarding the effectiveness of the work community and Alma Media as an employer. The most extensive of these surveys is the annual Quality of Work Life (QWL) survey conducted in all of Alma Media's units. The target set for the survey is a QWL index of at least 83 per cent. This target was exceeded in the year under review, with the score being 83.1 per cent. The state of the work community is also measured annually by finding out how willing the employees are to recommend Alma Media as an employer.

The target is a score of at least 8 on a scale of 1–10. Alma Media achieved a score of 8.3 (eNPS 43). In addition to using surveys, Alma Media evaluates its performance as an employer by monitoring the long-term retention of new employees. The target is for 90 per cent of new employees to stay with the Group for at least two years after being hired.

Of the employees who joined the company two years ago as new employees in Finland, 86.5 per cent remained with the company during the year under review. The voluntary departure turnover of Mentoring programmes, knowledge workshops and theme events aim at competence growth and learning together.

Alma Media's employees in the Group's operating countries was 10.2 per cent on average.

Other development projects during the year

Alma Talent continued the extensive managerial training programme called **Kasvun valmentajat** ('Instructors of Growth') started in 2021 to support supervisors' capabilities in a digital and multi-location work environment. In 2022, a similar managerial programme was launched in the Alma Consumer segment. In 2022, the Alma Academy of Alma Media Solutions was also continued on the topic of feedback culture.

Alma employees in Finland utilised the Alma Talent Seduo online learning environment. The digital training service, which has been localised for the Finnish market by Alma Talent, gives employees the opportunity to complete training modules on various themes, such as the digital transformation, management, communication and data as well as sales and marketing. In 2022, we implemented a trainee programme for recent technology graduates. With the help of the programme, we increased the know-how important to the company's business and employed 15 young people in the early stages of their careers.

Focus areas for the development of sustainability in 2023

In 2023, Alma Media aims to further improve its employees' opportunities

for the continuous goal-driven development of their competence. The company will increase the use of online training materials. Competence development utilises, for example, expert communities and builds customised thematic coaching utilising Alma's expertise. The development of managerial skills and leadership is supported by managerial training. Managers and all employees are trained with the aim of achieving success in a digital, diverse and multi-location work environment. The coaching will continue with the Growth Day, Agile Challenge, Product Academy and Alma Academy concepts. The culture of knowledge sharing is promoted by, for example, growing and training the Alma coach community. We will continue to develop the operating model for multi-location work introduced at Alma Media in 2022. The Auntie service will continue to be available to employees to support well-being at work and lectures on well-being will also continue.

Table 10: Future-fit workforce

Definition 2022	Progress made in 2022	Definition 2023		
Employee well-being, commitment and competence development as well as competence development within the organisation are of key importance to ensure the success of our business	Alma Media's number of employees increased by 9 per cent in 2022. We arranged training programmes that supported the development of employee competence and invested in the collaborative learning of employees and knowledge sharing by organising competence work- shops and theme events, amongst other things.	Employee well-being, commitment and competence development well as competence development within the organisation are of key importance to ensure the success of our business.		
Strategic intent:		Strategic intent:		
To have the most competent, committed and well-being employees in the industry		To have the most competent, committed and well-being employees in the industry.		
Objectives for 2022:		Objectives for 2023:		
Equality in learning and personal development	Open virtual training. Personal competence goals and development plans for everyone.	Equality in learning and personal development		
Continuous professional development, sharing of competence and self-development	Development programmes for managerial work, coaching that sup- ports continuous learning and knowledge sharing, competence work- shops and theme events	Continuous professional development, sharing of competence an self-development		
High quality of working life, QWL >83.	High quality of working life, QWL = 83.1	High quality of working life, QWL >83.		
Well-being training in cooperation with the occupational health care provider. The development and implementation of the operating model of multi-location work continued in 2022	The employees have been offered webinars on topics that promote well-being at work and the Auntie service is available to the employ- ees. The multi-location work model increases the flexibility of work in different life situations.	Well-being training to be arranged in cooperation with the occupation al health care provider. Development of the multi-location work mode to continue in 2023.		
Turnover of new employees to be lower than 10 per cent	Turnover of employees who have been in the company for less than 2 years was 13.5 per cent. The average employee turnover in the Group was 10.2 per cent.	Turnover of new employees under 10 per cent		
Likelihood of recommending the Group as an employer 8 (1–10).	Likelihood of recommending 8.3 (1–10)	Likelihood of recommending the Group as an employer 8 (1–10)		

Sustainable brands

Responsible media

Managing responsible journalism

The editorial teams of our media are committed to truthful, open and pluralistic journalism. Preserving trust in the media is a prerequisite for Alma Media's business. Our media comply with the Guidelines for Journalists drafted by the Council for Mass Media, which is the Finnish media sector's self-regulatory organisation. The guidelines concerning journalism are in many ways stricter than the legislation governing freedom of speech, freedom of expression and the media in general. The topics covered in the Guidelines for Journalists include the principles of obtaining information, the journalist's professional position and the rights of interviewees. The Guidelines also stipulate how media outlets need to rectify their errors and separate journalism from advertising.

In addition to publishing guidelines concerning ethics in journalism, the Council for Mass Media handles dozens of complaints each year regarding content published by Finnish media outlets. Alma Media's editorial teams interpret the Council's decisions as precedents that guide operations. In responsible journalism, Alma Media journalists and editorial

offices act transparently and responsibly under all circumstances in their role as a source of information. High-quality journalism engages the readers' long-term commitment to Alma Media's media and. consequently, the readers characterise them as high in quality and reliable in reader surveys. The responsibility for the journalistic content of Alma Media's media lies with the Editor-in-Chief of each media, assisted by editorial supervisors. Editors-in-Chief and other supervisors of the editorial teams are responsible for creating a strong journalistic culture by providing active guidance and feedback as well as by developing the editorial teams' internal guidelines and style books. The aim is to ensure that all employees of Alma Media's editorial offices understand their professional responsibility. In developing responsible journalism, the supervisors of the editorial teams also monitor the results of reader surveys and brand surveys as well as customer feedback and the public discussion regarding the media to ensure the purposefulness, service ability and pluralism of content. Monitoring the readership indicates the importance of the subjects to our readers and of their significance for society. Readers who are dissatisfied with content can, for



example, send feedback to the editorial team or submit a request for correction.

Management of responsible marketing

The truthfulness of marketing and preventing the misleading of consumers is a basic condition for campaigns published in the Group's media and services. The digitalisation of advertising has seen the focus of the development of responsible advertising shift increasingly to ensuring the security of the advertising environment as well as the responsible collection and use of consumer data. The automation and internationalisation of advertising and the increasingly complex digital advertising ecosystem require Alma Media to make significant investments in maintaining a high-guality and safe media environment. The Group systematically strengthens its technical capabilities and employee competencies to ensure that no advertising fraud or advertisements that are contrary to good marketing practices are published in its online and mobile services, and that user data is not collected or used inappropriately in connection with advertising. Alma Media complies with the legislation governing marketing as well as the marketing communications industry's self-regulation in monitoring the advertising activities of its customers and when engaging in marketing communications for its media brands and

services. The Group is actively involved in the development of digital marketing competence throughout the marketing communications industry in Finland.

The possibilities of consumers to impact the collection and utilisation of data create a framework for the utilisation of data by the media. It is possible to display or measure programmatically bought advertising targeted on a data-driven basis, personalise content and create advertising profiles only for users who have consented to it. Regardless of the commercial practice, it is possible to display or measure bought advertising targeted on a data-driven basis, personalise content and create advertising profiles only for users who have consented to it. User consent to the targeting of advertising is forwarded to Alma Media's approved partners in the advertising buying supply chain. Through the TCF (Transparency & Consent Framework), Alma Media approves its partners and the purposes of data use as part of Alma Media's data protection practices and maintains a list of approved partners on its website.

Alma Media's media sales and marketing organisation is in charge of the development of responsible marketing together with each brand's marketing organisation. In software procurement related to digital marketing, assistance is provided by Alma Media's Chief Digital Officer and the rest of the ICT organisation. The Group's specialist on data protection ensures the compliance of the management and utilisation of user data and the user consent management tool.

Achievement of sustainability targets in 2022

The main sustainability target of the company's media is the truthfulness of the content, the reliability of the sources, the accuracy of the content and the promotion of good commercial practice. One of the indicators is the number of condemnatory decisions of the Council for Mass Media addressed to the media, which shall not exceed the threshold of 5 decisions. During the year under review, Alma Media's Iltalehti received two condemnatory decisions from the Council for Mass Media. In another decision, the Council for Mass Media stated that Iltalehti should have labelled the news about its IL Plus service more clearly as an advertisement. According to another condemnatory decision, Iltalehti corrected an error in one of the news reports too slowly. In 2022, the Council for Mass Media handled a total of 41 complaints and issued a condemnatory decision in eight of those cases.

The company promotes good commercial practice and complies with the marketing rules of the International The truthfulness of marketing and preventing the misleading of consumers is a basic condition for campaigns published in the Group's media and services.

Chamber of Commerce and the guidelines of the Council of Ethics in Advertising. The key principle guiding responsible operations is that the company's online or mobile services do not contain advertisements that would violate the marketing regulations of the International Chamber of Commerce. In the year under review, one programmatically purchased gambling advertisement by an international operator managed to penetrate the technical protection of our site and was briefly published on our site. The advertisement was guickly removed. Foreign gambling advertising is not allowed in Finland. Alma Media did not receive any complaints in its operating countries from the authorities that supervise ethics in advertising or the marketing industry's own self-regulatory bodies.

Other development projects during the year

The company's media have annual development targets to promote the sustainable development of society. Out of the financial and professional media, Kauppalehti and Tekniikka&Talous set their own specific keywords for each editorial article offering solutions to climate change. The keyword makes it easier for the reader to find content that offers solutions for mitigating climate change and improves the verification of the effectiveness of the media in raising the awareness of citizens and companies. A total of 180 articles offering solutions to mitigate climate change were published in Kauppalehti and 203 such articles were published in Tekniikka&Talous. These articles were read a total of 1.5 million times. In 2022, the editorial offices of Iltalehti and Kauppalehti were trained on the background of the condemnatory decisions made by the Council for Mass Media and, at the editorial staff's own request, training on the terminology of diversity was also organised in Iltalehti in cooperation with SETA. In addition, Iltalehti's journalists received training on legislation concerning journalism.

During the year under review, the Alma Media Solutions organisation developed the Muutoksentekijät ('Change Makers') solution for content marketing to emphasise the significance of corporate social responsibility work. The solution includes the production and publication of an article and a video interview in Kauppalehti and enables companies to emphasise their responsibility priorities.

The Group's media did not receive any funding from government, non-govermental or political entities. There were no legal proceedings associated with libel or slander and, therefore, also no financial liabilities related to them In order to ensure the IP protection of its media and services, the Alma Media Group efficiently protects is trademarks through the appropriate registrations, monitors the market for any violations of its trademarks and defends its trademarks in case of violations. Alma Media also actively ensures the protection and defending of copyright and database rights.

The journalistic principles of media include the principle of protecting vulnerable groups of the public. Information that might be shocking to children or young people, for example, is only published when strong journalistic grounds exist, and the appropriate labels are used to warn of such content in advance. Alma Media automatically excludes advertising classified as shocking and harmful from articles and videos. Advertisers may also separately request the removal of their advertising from certain media environments in order to ensure brand compatibility. Furthermore, it is prohibited to target content and advertising to young people under the age of 18 in Alma Media's media.

Focus areas for the development of media responsibility in 2023

In our financial media, we invest in the development of the diversity of our audiences, especially with regard to gender and age. In practice, we take the interests of different reader groups more widely into account in content planning and use data to monitor the development of the diversity of audiences following the content.

Kauppalehti has, in cooperation with the British consulting company FT Strategies, launched a project to develop the diversity of the subscriber base and media audiences moving forward. In connection with the project, we will implement, for example, a newsletter on the content related to climate change, which will contribute to increasing awareness of the promotion of sustainable development while increasing the diversity of our audiences.

As a media company that operates at the national scale, Alma Media is actively involved in the development of the Finnish marketing communications industry's expertise and responsibility agenda. Alma Media also takes the special challenges associated with digital marketing into consideration in the development of its own technical and other capabilities. Alma Media ensures compliance with the obligations placed on digital advertising by the General Data Protection Regulation (GDPR) and IAB Europe by allocating sufficient resources to the related activities, by ensuring it has the appropriate information management and data processing processes in place and by training its employees.

In 2023, we will continue to develop responsible media and marketing, ensuring a high-quality and brand-secure media environment and targeting data for advertisers.

We strive to minimise the carbon footprint of digital media and advertising and to provide guidance to our customers and partners on more environmentally friendly advertising. As a member of the IAB, we participate in the development of sustainability standards in the industry.

The GDPR and the browser-based measures taken by platform operators to restrict targeting based on cookies require media companies to more carefully assess alternatives based on user identification and contextual targeting, among other things.

Table 11: Responsible media.

Definition 2022	Progress made in 2022	Definition 2023			
Readers' trust is a precondition for journalistic media. We are committed to truthful, open and pluralistic journalism and responsible marketing.	Kauppalehti and Tekniikka&Talous introduced a special keyword to dis- tinguish and monitor content that offers solutions to climate change. Alma Media trained its journalists and Kauppalehti started cooperation to develop the diversity of its media audiences.	Readers' trust is a precondition for journalistic media. We are committed to truthful, open and pluralistic journalism and responsible marketing.			
Strategic intent		Strategic intent			
A defender of the freedom of speech, democracy and pluralist commu- nications		A defender of the freedom of speech, democracy and pluralist commu- nications			
Objectives for 2022:		Objectives for 2023:			
No more than five (5) of all the condemnatory decisions issued by the Council for Mass Media apply to Alma Media's media.	Iltalehti was subject to two condemnatory decisions: one about la- beling news on ILPlus service and one of too slow reaction to error in content.	No more than five (5) condemnatory decisions are issued to Alma Media's media by the Council for Mass Media annually.			
Implementation of keywords based on sustainable development and a responsible journalism training for reporters. Based on the use of keywords, a total of 180 articles offering solutions to mitigate climate change were published in Kauppalehti and 203 such articles were published in Tekniikka&Talous. These articles were read a total of 1.5 million times. The editorial staff participated in training on the background of the condemnatory decisions of the Council for Mass Media, and a diversity terminology training was arranged for Iltalehti employees in cooperation with SETA. Iltalehti also organised training on legislation related to journalism.		In the financial media, a project will be carried out to develop the diversity of audiences. The development of keywords on sustainable development will also continue. The content on climate change will be developed into a separate newsletter available as a subscription. Edito- rial staff are trained in responsible journalism.			
Ilma Media's media and services do not publish any advertisements hat violate the guidelines of good marketing practices published by he International Chamber of Commerce. One gambling campaign by an international operator was able to pass the protection measures of Alma Media's digital advertising network but it was quickly noticed and removed. Alma Media did not receive ar complaints in its operating countries from the authorities that super- vise ethics in advertising or the marketing industry's own self-regula- tory bodies.		Alma Media's media and services do not publish any advertisements that violate the guidelines of good marketing practices published by the International Chamber of Commerce.			

Sustainable services and brands

Our sustainability work is a reflection of its time and an even more integrated part of our operations. Our digital services enable us to influence climate change and promote responsible choices in housing and transportation as well as in decisions related to working life. Our training services allow us to develop professional competences in companies and promote sustainable business operations. Our corporate information business helps our customers grow sustainably and succeed responsibly by providing reliable information about the market and companies.

Customer satisfaction

We have earned our customers' trust thanks to our interesting and accurate content, good service, excellent user experience and our responsible record in processing customer data. Our business operations have transitioned more and more towards paying for the media and service content, which emphasises the significance of customer satisfaction even further. High customer satisfaction speeds up business growth, reduces the costs of customer acquisition, improves trust in the customer relationship and decreases the risk of customer loss. A satisfied customer is committed to using our service or product, the usage volume increases and the likelihood of recommending the service increases. In the digital service experience, customer satisfaction is strongly based on the correlation between customer expectations and experiences regarding the contents of our services, the technical user experience of our websites, such as findability and availability, ease of navigation and ease of the purchase process as well as the operation of customer support.

Trust in the functionality of the service and the data security of use are significant psychological factors affecting customer satisfaction. The common credentials for our media and services, the Alma ID, enable a smooth and safe navigation from one service to another in Alma's digital network. The Alma ID is now used in almost all Alma media and digital services in Finland. By the end of 2022, the number of registered users of the Alma ID was 1.9 million. The development of the self-service account and the transparency of the data collected from consumers was continued and harmonised with common tools. During the year, the Alma TD was also introduced to B2B



customers and its use will expand significantly in 2023. Developing an increasingly better and more personalised user and customer experience for a logged-in user is continuous work. The Alma ID enables the user-oriented development of our services and the growth of customer insight.

Customer satisfaction metrics

Alma Media's services and media are developed continuously. Customer satisfaction is measured by means of customer surveys and the Net Promotor Score metric, in which the users are asked about the likelihood of recommending the service to other users on a scale of 0–10. The results are divided into recommenders (score 9–10), passive users (score 7–8) who are satisfied but not committed to the service to such a degree that they would recommend it and critics (0–6) who have been dissatisfied with the service received. The number of critics is deducted from the number of recommenders, and the result is divided by the total number of respondents. This gives a score of -100 to 100. -100 means that all the customers are dissatisfied and 100 that all the customers are recommenders. In 2022, the annual NPS average in Alma Media's services varied from 18.1 (Vuokraovi.com) to 44.1 (Etuovi.com). Autotalli.com, for example, had an NPS score between these

values (average 25.0). So far, only some of the services have measured customer satisfaction using NPS, but a decision was made during the year to harmonise the metrics and the implementation of the model will start in 2023.

Ethical service design

In 2022, Aalto University's Capstone students carried out a project to provide a framework for Alma's ethical and green service design, the guiding factors of which were accessibility, data protection, cyber security and reducing energy consumption.

In Alma Media, ethical service design refers to the planning and development of ethically sustainable business with the purpose of, among other things, ensuring the good availability of our digital services to all population groups. In Alma Media, ethical service design also means utilising machine learning, data and analytics ethically. We do not create target groups consisting of children or young people aged under 18 and, therefore, do not target any content or advertising to such a group. The algorithms used for targeting content do not restrict the accessibility of content to any user group. Alma Media has also started a survey on the compliance of our services with the EU accessibility directive, even though the directive is not directly binding to our services. In 2022,

Alma Talent's services invested in building a design system where improving accessibility is one of the key objectives. This system has already been implemented by Talouselämä and will be implemented by all Alma Talent websites.

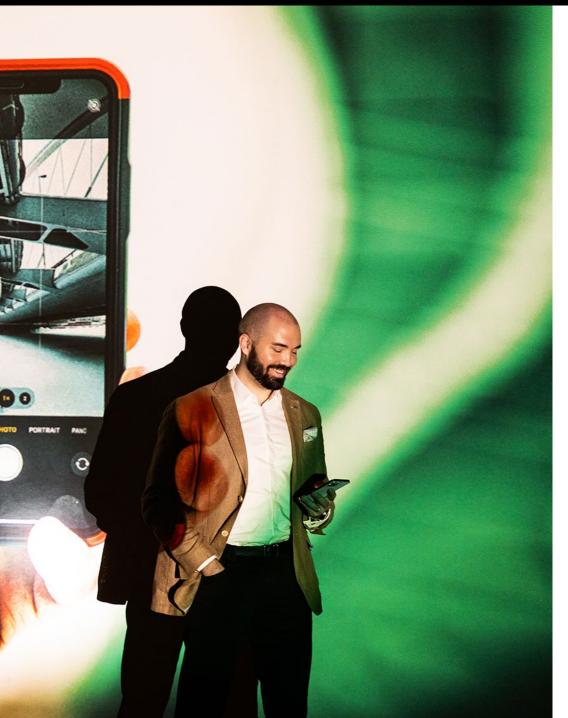
The evaluation of corporate responsibility is an important part of the selection of partners in every aspect of business operations. Reliable and comparable corporate sustainability information is still scarce, especially for small and medium-sized enterprises. The regulations will facilitate the collection of corporate sustainability information as reporting obligations will be expanded and the legislation related to companies' duty of care will be specified. In 2022, a study was carried out on SMEs' corporate sustainability information and a hackathon was organised to brainstorm future corporate sustainability data services. Efforts to find a sufficiently high-quality solution will continue, and the goal for the next few years is to help customers find and select their customers and partners more responsibly.

During the year, Alma Media's employees have been offered internal training on accessibility and an accessibility testing guide has been compiled to provide tips and guidelines for starting accessibility testing. In addition, an internal handbook The purpose of ethical service design is to ensure the accessibility of our digital services to all audiences.

on ethical service design and a testing guide following accessibility criteria were prepared to support measures such as auditing. The mapping of the production of internal documents will continue in 2023.

Green service design

Another service design factor identified in the materiality analysis is the green development path. In 2022, Alma Media's housing services reached an average of 965,000 different visitors per week and motoring services an average of 797,000



different visitors per week. Our services enable users to make responsible choices by offering environmentally oriented search criteria for listing items. In our Etuovi.com service, the user can restrict the available choices based on factors such as the source of heat used in the apartment. In a similar manner, users of our automobile services Nettiauto.com and Autotalli.com can choose a vehicle based on the type of energy used, consumption and emission category. These factors also have a direct impact on the amount of vehicle tax and the costs of operation. In 2022, the number of electric or gas cars offered in both services has increased by 100 per cent in Nettiauto, reaching more than 5,000 options at the end of the year and more than 4,000 options in Autotalli.com. The search in the Nettiauto service was developed to take into account the search for electric cars. The new search criteria include, among other things, battery capacity, charging power and type as well as electric range. Sales trends in electric cars and hybrids have been excellent.

The criteria used in these services will be developed further, and the possibilities to make sustainable choices in the acquisition of a home or a vehicle will be highlighted in communications.

Sustainable cities and communities

The sustainability area Sustainable cities and communities identified in Alma Media's materiality analysis is an opportunity for the company to influence sustainable development as our services include electronic services, digital services that support everyday living and location services that reduce unnecessary driving and transport. Different kinds of residential community services may also increase a feeling of togetherness among the residents of a specific area and improve social connections and the pleasantness of the community. Through the services of the comparative and sharing economy, goods and services in regional communities find new owners efficiently, reduce the carbon footprint of housing and cut back on unnecessary consumption and storage.

In 2022, to support consumers' sustainable choices in housing, the company's housing services <u>Etuovi.com</u> and <u>Vuokraovi.com</u> developed a service concept that will enable consumers to make sustainable choices in housing quickly and easily. This also gives housing professionals the opportunity to market their own services in relation to sustainable choices. The conceptualisation work will continue with regard to sustainable data on housing, consumption habits and the provision of sustainable housing services in close cooperation with customers, operators in the field and Aalto University, as well as in student projects.

During the year, two development projects were carried out with the students of Aalto University's Information Technology Programme; the first related to the EU-published taxonomy for sustainable finance and the second to map and location-based services. The results of the project will be utilised in product development with the aim of creating smart future services for assessing the sustainability of buildings and visualising site-specific and regional data on a map.

Cooperation and partnerships for sustainable development in 2022

Thanks to its extensive cooperation with companies, Alma Media is highly networked in its business areas. Alma Media also has significant social partnerships in Finland and abroad. In Finland, the Group is an active member in the industry organisation Finnmedia, Finland Chamber of Commerce and IAB Finland. Collaboration with the Finnish Children and Youth Foundation started in 2016 already with the aim of ensuring a better future for young people. The cooperation has included media literacy projects, cooperation with young climate

influencers and the development of young people's mental well-being and working life skills, also taking into account young people in need of special support. In 2022, the most significant form of cooperation in Finland was the project of national introduction to working life (TET) launched together with the Finnish Children and Youth Foundation. The parties agreed on cooperation for the years 2022–2024 and on the focus of cooperation in enabling young people to familiarise themselves with working life on a more equal basis than before, on increasing working life experience and on building connections between businesses and young people.

In May 2022, Alma Media, together with the Finnish Children and Youth Foundation, launched the concept of introduction to working life (TET), with the aim of making the TET experiences more meaningful for both young people and businesses. TET weeks in accordance with the new concept were carried out in the project's cooperation companies in the spring and autumn. In 2023, a service will be launched to significantly increase the number of publicly available TET positions through business cooperation. The development work has involved a number of young people and educational institutions from all over Finland, as well as Alma Media and other significant

companies such as Deloitte, Outokumpu, Wärtsilä, Stora Enso and the Deaconess Foundation. The 'introduction to working life' week, or TET, is an activity included in the official school curriculum in Finland.

In October 2022, Alma Media's job search service, previously known as Monster, was redesigned as Jobly. The service introduces impact data from the Finnish technology company Upright to support job search, making it the world's first job search service that offers applicants independent information on the impact of companies. Impact data is presented from companies for which it is currently available. The emphasis is initially on the largest companies, but the goal is to increase the number significantly in the coming years.

During the year, cooperation with the Women in Tech Finland (WIT) organisation was launched. The common goal is to increase diversity, equality and inclusion in the field of technology and to encourage and inspire women to seek employment in technology. As part of the cooperation, women working in technology at Alma and their career stories will be highlighted. In 2022, WIT and Alma organised a joint event called Responsible business in digital environment.

Alma Career collected nearly 12,000 permanent jobs suitable for Ukrainians in the Workania.eu service.

Alma Media supports the growth and development of the automotive industry by cooperating with The Confederation of the Automotive Industry (AKL). The Confederation of the Automotive Industry is an association that promotes the economic and labour market interests of the sector and provides various services. Its mission is to promote the operating conditions of its member companies. The partnership started in 2019 and has included content and development cooperation, other customised training, and discussions between Alma employees and automotive experts.

International social projects — we support the job search of Ukrainians

Alma Media operates in 11 countries, and the company's operations in Eastern Central Europe have focused on recruitment and employment services, such as training of professionals. In Alma Media's operating countries, recruitment services are involved in several projects aimed at improving working life skills in Eastern Central Europe.

Internationally, Alma Media's most significant social project in 2022 was to harness its job portals in 11 countries to support the job search of Ukrainian refugees almost immediately after the war began. In practice, the Alma Career countries offered Ukrainian refugees suitable jobs on the basis of their language skills on the recruitment websites of their own countries. Later, the site created by Alma Career in cooperation with country organisations in the Czech Republic and Slovakia brought these jobs together under the Workania.eu service. Nearly 12,000 permanent jobs suitable for Ukrainian refugees in the Czech Republic were published through Workania.eu during 2022.

In addition, local offices in the company's operating countries organised collections for goods and clothing to be sent to Ukraine and arranged transportation of aid to the border as soon as the Russian invasion started. Moreover, the employees collected and donated funds to aid Ukrainians in addition to Alma Media's official monetary donations.

The Czech LMC participated in many national and NGO projects to help refugees and people affected by the war in Ukraine – in particular in cooperation with People in Need, one of the largest NGOs, and the Czech Ministry of Labour and Social Affairs.

In addition, Profesia launched a call centre for Ukrainian-speaking jobseekers in Slovakia and CV-Online in Latvia opened a Telegram account for Ukrainian jobseekers, quickly attracting more than 1,000 subscribers and 5,000 impressions of publications. CV-Online Latvia also conducted a survey of its client companies regarding the recruitment of Ukrainian workforce. 146 local companies responded to the survey, more than half of which said they had hired a Ukrainian jobseeker on a permanent or temporary basis since February. CV-Online in Estonia conducted a survey of 4,378 employers and jobseekers to gain a better understanding of how to help Ukrainian refugees find work in Estonia.

Increasing inclusion in the labour market

In Slovakia, Profesia continued its long-term work to increase the sense of inclusion in the labour market by developing tools and services for companies. In 2022, the Help with Heart programme supported companies in recruitment and training for the employment of disabled people and provided vocational and career counselling to more than 100 disabled jobseekers. Profesia announced the launch of the Profesia Lab that brings the latest know-how to the employment of neurodivergent people.

Modern HR tools for schools and NGOs

In Slovakia, Profesia launched an academy for school principals four years ago with the aim of improving the management of primary and secondary school staff to promote the work motivation, well-being and commitment of teaching staff. The project has inspired other NGOs to involve school principals in their projects. By the end of 2022, 86 school principals completed all three modules of the training, which consist of developing leadership, teamwork and vision in an educational environment.

In order to promote the openness of Slovakian society and the equality of job search, Profesia continued to provide

recruitment services free of charge to NGOs and schools in 2022 to increase the openness and transparency of recruitment to public posts. 291 job advertisements for non-profit organisations with a monetary value of EUR 30,689 were published on Profesia.sk. The use of edujobs.sk, a job listing service for school and educational staff, reached a record level in its history. In order to improve the transparency of the recruitment processes in the Slovakian school system, Profesia's support for recruitment was significant; a total of 7,190 jobs in 1,560 schools were publicly advertised in the service. The monetary value of the job advertisements was EUR 568,010.

LMC, a subsidiary of Alma Media in the Czech Republic, continued the programme to provide recruitment services to NGOs and non-profit organisations for a nominal fee of one euro. More than 730 NGOs and other non-profit organisations participated in the programme. The calculated value of the services in the year under review was approximately EUR 8.1 million and more than 9,000 permanent jobs were announced through the programme. LMC has also provided NGOs and non-profit organisations access to its other services – such as Seduo.cz online training service and Arnold survey tool – for a nominal fee.

In Bosnia and Herzegovina, Kolektiv implemented a project for the employment of young people funded by the Swiss government. In 2022, five academies were implemented in the partner companies, offering training positions to 308 young people. In addition, Kolektiv, in cooperation with the World Bank, carried out a project providing employment and counselling services for the long-term unemployed and women not included in workforce free of charge. In the year under review, counselling services were provided to 600 unemployed women. Training in social and cooperative skills was provided to 464 project participants and technical training to 10. The project helped 231 unemployed people find employment. In addition, Kolektiv, in cooperation with the Sarajevo Open Centre and the United Nation Population Fund (UNFPA), conducted The Most Attractive Employer survey with responses from 15,000 people from a total of 500 companies. The winners for 2022 were announced at the the award ceremony in February 2023.

In Croatia, MojPosao highlighted the importance of diversity in society during Pride Month by changing its logo to a rainbow on social media and in the job portal. In addition to the annual employee satisfaction surveys improving the quality of working life and the Best HR Practice Award, MojPosao also supports the Key Different project that encourages employers to hire disabled job seekers.

In the Baltics, the Lithuanian CV-Online participated in the international DUOday event and theme day where companies and organisations open their doors and introduce their companies to the disabled. CV-Online has also supported SOPA which assists the integration of people with disabilities into the open labour market. CV-Online organised free seminars for approximately 24,000 upper secondary school, vocational school and higher education students on the labour market, job search and CV writing and launched a YouTube project aimed at young people, reaching 158,500 young job seekers.

CV-Online Estonia conducted surveys on the state of work environments and well-being in Estonia, such as "Working during holidays" and "Bullying at workplaces", receiving almost 5,000 responses. The aim of the surveys was to raise awareness of mental health and distribute information in order to improve working environments in Estonia. Based on the results, CV-Online Estonia created more than 20 educational blog articles. The blog has attracted more than 64,055 readers and three times the attention on social media.

Developing sustainability and responsibility through cooperation in 2023

In 2023, Alma Media aims to further enhance social and business cooperation in order to promote sustainable development. Resources are focused on key themes defined on the basis of the company's strategy and materiality analysis as well as the company's business operations in accordance with key opportunities for influence. More and more areas of materiality are strongly related to the company's service business and brands and create the basis for the creation of new business opportunities based on sustainable development.



Alma Media continuously develops its financial reporting related to the climate. One of the new aspects of this report is the description of financial risks and opportunities related to the climate according to the TCFD recommendations (Task Force on Climate-related Financial Disclosures). In accordance with the TCFD recommendations, they are described in four subject areas: governance, strategy, risk management and metrics and targets.

Table 12: Information in accordance with TCFD

rt of the annual Group-level risk assessment process. The thresh- up's business segment and operations. The financial or strategic s: he realisation of the risk within 6 months is high and if the net loss is
illion euros (medium risk) euros (small risk).
ill complicate the harvesting of wood by the paper suppliers that which may lead to higher paper prices. Increasingly strict national ay also have cost impacts in Alma Media's subcontracting chain. ery costs have an effect on the costs of print publications, for ex- g extreme weather phenomena caused by climate change are pre- cal disruptions to digital services in Alma Media's various operating nvironmental risks by systematically developing its operations in pe-based climate targets (SBTi) and by engaging in active environ- ers.
rt of the annual Group-level risk assessment process. With regard to ed the risks of, for example, extreme weather conditions, increased nd the pricing mechanism as well as changes in customer behaviour up has also identified the impacts of these risks on the operational ice.
and assessed as a part of the annual Group-level risk assessment arketing and operating environment, operational and business as- ure framework of regulation and reputational risks.
the Board of Directors: Statement of non-financial information/Envi- 1–42 and Sustainability Report p. 158, 160–161, 168, 171–173, 176–177
the Board of Directors: Statement of non-financial information/Envi- 42, and Sustainability Report p. 172, 173, 177

Calculation and data collection principles for corporate sustainability

Alma Media uses the GRI Standards of the Global Reporting Initiative and

the instructions of the Sustainable Accounting Standard Board, where applicable, in its sustainability reporting. As a general rule, the reporting covers all of Alma Media Group. Responsible media is still also reported under the GRI-G4 guidelines. The aspect boundaries and GRI and SASB aspects used in Alma Media's sustainability reporting are presented in the tables on following pages. The 2022 report has not been subject to an independent assurance.

Milestones in Alma Media's Sustainability Path

2010 Alma Media starts reporting for the Carbon Disclosure Project (CDP)

2012 Alma Media works out the environmental impact of printed magazine and online media together with VTT and Kungliga Tekniska Högskola

2013 The share of digital business rate exceeds 50% of the revenues

2015 Alma Media commits to the Paris Agreement to achieve the objectives of COP21 **2021** SBTi 1.5°C targets approved, based on the latest normal year before the pandemic 2019 baseline

2020 The Alma House (HQ) switches to renewable energy sources for district heating and district cooling

2019

The company moves to the procurement of zero-emission renewable energy (hydropower) for Finnish activities

2018

Alma Media is the third media company in the world to set the validated SBT 2°C targets based on 2016 baseline

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102-31	Frequency of the Board of Directors' reviews of risks	Report by the Board of Directors <u>p. 36–37</u>	
102-32	The Board of Directors' role in sustainability reporting	Report by the Board of Directors <u>p. 22</u> , Sustainability Report <u>p. 166–167</u>	
102-33	Communicating critical concerns	Report by the Board of Directors <u>p. 22</u>	
102-34	Nature and total number of critical concerns	Report by the Board of Directors <u>p. 22</u>	
102-35	Remuneration of the Board and senior executives	Remuneration Report <u>p. 149–155</u>	
102-36	Process for determining remuneration	Remuneration Report <u>p. 149–155</u>	
102-40	List of stakeholder groups engaged by the organisation	Sustainability Report <u>p. 163</u>	
102-41	Percentage of total employees covered by collective bargaining agreements		Alma Media complies with the labour legislation in all

its operating countries. Information about the number of employees covered by collective bargaining agreements is available for the business operations in Finland and Sweden. In Finland, 61 per cent of employees were covered by collective agreements at the end of 2022. All of Alma Media's employees in Sweden were covered by collective agreements in 2022.

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102-45	Entities included in the consolidated financial statements	Report by the Board of Directors <u>p. 12</u>		
102-46	Defining the report content	Report by the Board of Directors <u>p. 2</u>		
102-47	Material topics and their calculation boundaries	Sustainability Report <u>p. 162</u> , <u>197</u>		
102-48	Restatements of information	Sustainability Report <u>p. 197</u>		
102-49	Significant changes in the scope and topic boundaries	Sustainability Report <u>p. 197</u>		
102-50	Reporting period	1 January–31 December 2022		
102-51	Date of most recent report	8 March 2022		
102-52	Reporting cycle	Annual		



GRI Indicat	or	Location	More information
102-53	Contact point for questions regarding the report	comms@almamedia.fi	
102-54	Claims of reporting in accordance with the GRI Standards	Sustainability Report <u>p. 199–202</u>	
102-55	GRI content index	Sustainability Report <u>p. 199–202</u>	
102-56	External assurance	Sustainability Report <u>p. 197</u>	
Managemer	nt approach		
103-1	Material topics and their Boundaries	Sustainability Report <u>p. 166–167</u>	
103-2	The management approach and its components	Sustainability Report <u>p. 166–167</u>	
103-3	Evaluation of the management approach	Sustainability Report <u>p. 166–167</u>	
Economic s	tandards		
Economic p	erformance		
201-1	Direct economic value generated and distributed	Report by the Board of Directors <u>p. 21</u>	
201-4	Financial assistance received from government	Sustainability Report <u>p. 170</u>	
Anti-corrup	tion		
205-1	Operations assessed for risks related to corruption	Sustainability Report <u>p. 169–170</u>	
205-2	Communication and training about anti-corruption policies and procedures	Sustainability Report <u>p. 169–170</u>	
205-3	Confirmed incidents of corruption and the actions taken	Sustainability Report <u>p. 170</u>	
Anti-compe	titive behaviour		
206-1	Legal actions for anti-competitive behaviour, anti-trust and dominant market position practices	Sustainability Report <u>p. 170</u>	
Environmen	ital standards		
Energy			
302-1	Energy consumption within the organisation	Sustainability Report <u>p. 172</u>	
302-2	Energy consumption outside of the organisation	Sustainability Report <u>p. 172</u>	
Emissions			
305-1	Direct (Scope 1) GHG emissions	Sustainability Report <u>p. 172</u>	
305-2	Energy indirect (Scope 2) GHG emissions	Sustainability Report <u>p. 172</u>	
305-3	Other indirect (Scope 3) GHG emissions	Sustainability Report <u>p. 172</u> , <u>176</u>	
305-4	GHG emissions intensity	Sustainability Report <u>p. 172</u>	
305-5	Reduction of GHG emissions	Sustainability Report <u>p. 172</u> , <u>176</u>	
307-1	Non-compliance with the environmental laws and regulations	Sustainability Report <u>p. 172</u>	
308-1	New suppliers were screened using environmental criteria	Sustainability Report <u>p. 176</u>	



GRI Indica	tor	Location	More information
308-2	Negative environmental impacts in the supply chain and actions taken	Sustainability Report <u>p. 176</u>	
Social star	Idards		
Employee	turnover		
401-1	New employee hires and employee turnover	Sustainability Report <u>p. 184</u>	
Training ar	nd education		
404-1	Average hours of training per year per employee 404-1		Not available for 2022
404-2	Programs for upgrading employee skills and transition assistance programs	Sustainability Report <u>p. 184–185</u>	
404-3	Percentage of employees receiving regular performance and career development reviews	Sustainability Report <u>p. 184</u>	
Diversity a	nd equal opportunity		
405-1	Diversity of governance bodies and employees	Sustainability Report <u>p. 181–182</u>	
405-2	Ratio of basic salary and remuneration of women to men		Alma Media does not define the gender of its employ- ees.
Non-discri	mination		
406-1	Incidents of discrimination and corrective actions taken	Sustainability Report <u>p. 182</u>	
414-1	New suppliers that were screened using social criteria	Sustainability Report <u>p. 176</u>	
414-2	Actions taken to minimise negative social impacts in the supply chain	Sustainability Report <u>p. 176</u>	
Public poli	су		
415-1	Political contributions	Sustainability Report <u>p. 169</u>	
Marketing	and labelling		
417-3	Incidents of non-compliance with laws, regulations and/or voluntary codes con- cerning marketing communications	Sustainability Report <u>p. 188</u>	
Customer	privacy		
418-1	Total number of substantiated complaints received concerning breaches of customer privacy and losses of customer data	Sustainability Report <u>p. 179</u>	
Compliand	e		
419-1	Non-compliance with the laws and regulations in the social and economic area	Sustainability Report <u>p. 170</u> , <u>182</u>	
Content in	accordance with GRI G4		
Standards	applicable to the media sector		
G4-M1	Significant funding and other support received from non-governmental sources	Sustainability Report <u>p. 169</u>	
G4-M2	Methodology for assessing and monitoring adherence to content creation values	Sustainability Report <u>p. 187–189</u>	
G4-M3	Actions taken to improve adherence to content creation values	Sustainability Report <u>p. 187–189</u>	
G4-M4	Content accessibility, protection of vulnerable audiences and informed deci- sion-making	Sustainability Report <u>p. 187–188</u>	
G4-M7	Actions taken to empower audiences through media literacy skills development	Sustainability Report <u>p. 189, 194</u>	

Global Compact content index

Principle	Location
Human rights	
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.	Sustainability Report: Code of Conduct <u>p. 169, 176–178, 181</u>
Principle 2: Businesses should make sure that they are not complicit in human rights abuses.	Sustainability Report: Code of Conduct <u>p. 169</u> , <u>176–178</u> , <u>181</u>
Careers	
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Sustainability Report: Code of Conduct <u>p. 169, 176–178, 181</u>
Principle 4: Businesses should support the elimination of all forms of forced and compulsory labour.	Sustainability Report: Code of Conduct <u>p. 169</u> , <u>176–178</u> , <u>181</u>
Principle 5: Businesses should support the effective abolition of child labour.	Sustainability Report: Code of Conduct <u>p. 169</u> , <u>176–178</u> , <u>181</u>
Principle 6: Businesses should support the elimination of discrimination in respect of employment and occupation.	Sustainability Report: Code of Conduct <u>p. 169</u> , <u>176–178</u> , <u>181</u>
Environment	
Principle 7: Businesses should support a precautionary approach to environmental challenges.	Sustainability Report: Code of Conduct <u>p. 176–178</u> , <u>181</u>
Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.	Sustainability Report: Code of Conduct <u>p. 176–178, 181</u>
Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.	Sustainability Report: Code of Conduct <u>p. 176–178, 181</u>
Anti-corruption	
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	Sustainability Report: Code of Conduct <u>p. 169</u> , <u>176–178</u> , <u>181</u>

Sustainability reporting in accordance with the SASB (Sustainable Accounting Standard Board) Reporting Framework

SASB compliance		Location	More information
TC-IM-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behaviour regulations	Sustainability Report <u>p. 170</u>	
SV-ME-270a.3	Description of approach for ensuring journalistic integrity of news programming related to: (1) truthfulness, accuracy, objectivity, fairness, and accountability, (2) independence of content and/or transparency of potential bias, and (3) protection of privacy and limitation of harm	Sustainability Report <u>p. 187–188, 179–180</u>	
SV-ME-520a.1	Description of approach to ensuring intellectual property (IP) protection	Sustainability Report <u>p. 179–180</u>	
SV-ME-270a.1	Total amount of monetary losses as a result of legal proceedings associated with libel or slander	Sustainability Report <u>p. 170</u>	
SV-ED-230A.1 CG-EC-230A.1 TC-IM-230A.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Sustainability Report <u>p. 179–180</u>	
SV-ED-230A.2	Description of policies and practices relating to collection, usage and retention of student information	Sustainability Report <u>p. 179–180</u>	
SV-ED-230A.3 CG-EC-230A.1 TC-IM-230A.1	(1) Number of data security breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	Sustainability Report <u>p. 179–180</u>	
CG-EC-220A.1 TC-IM-220A.1	Number of users whose information is used for secondary purposes	Sustainability Report <u>p. 179–180</u>	
CG-EC-220A.2 TC-IM-220A.1	Description of policies and practices relating to behavioural advertising and user privacy	Sustainability Report <u>p. 188</u>	
TC-IM-220A.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Sustainability Report <u>p. 179</u> , <u>170</u>	
SV-ME-260A.2	Description of policies and procedures to ensuring pluralism in news media content	Sustainability Report <u>p. 187</u>	
SV-ME-260a.1 TC-IM-330A.3	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff and (3) all other employees	Sustainability Report <u>p. 181–182</u>	
TC-IM-330A.1	Percentage of employees that are foreign nationals	Sustainability Report <u>p. 182</u>	
TC-IM-330A.2	Employee engagement as a percentage, 5	Sustainability Report <u>p. 184</u>	
TC-IM-130A.3	Discussion of the integration of environmental considerations into strategic planning for data centre need	Sustainability Report <u>p. 174–175</u>	

NASDAQ ESG		Location
G6.1	Does your company follow an Ethics and/or Anti-Corruption policy?	Sustainability Report <u>p. 169</u>
G6.2	If yes, what percentage of your workforce has formally certified its compliance with the policy?	Sustainability Report <u>p. 169</u>





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