

CODE OF BUSINESS ETHICS

nordic
morning

NORDIC MORNING'S CODE OF BUSINESS ETHICS

This document summarizes our Code of Business Ethics. The Code of Business Ethics is based on our core values and is intended to guide our interactions with colleagues, customers, partners and other stakeholders.



The Code of Business Ethics will help us conduct successful business operations and feel good in our work.

In orienteering, it is necessary to understand the entire route on the map, and to follow it carefully from one point to another to eventually reach the goal. The same applies to the Code of Business Ethics: we at Nordic Morning are responsible for making sure we understand the Code of Business Ethics, and apply its rules carefully to our daily work.

Timo Lepistö CEO

OUR VALUES

Respect – we are dedicated to equality, openness and honesty.

Renewal – we are open-minded and innovative forerunners in communications.

Responsibility – we strive for results in an ethical and sustainable way.

The subsidiaries' values are in line with these core values.





PEOPLE

We believe individuals with diverse backgrounds and experience, working in an environment that fosters respect, are essential to our continued success. We are committed to providing career opportunities, nurturing talent, developing leaders and rewarding achievement. We encourage our employees to share their expertise and cooperate across the Group to enhance our competitiveness.

We are an equal-opportunities employer. Everyone should feel welcome to work with and for us, regardless of gender, age, race, cultural background, religious beliefs or sexual orientation. Our employees are entitled to professionalism and good leadership from their managers.

We are committed to providing employees with a good physical and social environment. This means our employees are entitled to a workplace that is safe, conducive to good health and of a high ergonomic standard. It also means we promote a positive atmosphere in the workplace; one that is free from bullying, harassment and favoritism, and which supports a healthy balance between work and personal time.



THE COMPANY

The brands of Nordic Morning and its companies are a valuable asset that we can protect and strengthen by behaving with integrity and professionalism. A key area of our Code of Business Ethics concerns identifying and preventing conflicts of interest. These can arise in interactions involving employees, employers and commercial partners.

In this context, it is crucial that we act with the company's interests in mind, as opposed to our personal interests. Whenever personal interests have the potential to compromise the company's interests, this conflict of interests must be declared and remedial action taken.

Neither we nor our families should unduly benefit from any business deal we carry out with suppliers on behalf of Nordic Morning companies. Nor should we compete directly or indirectly with any aspect of our employer's business.

Confidentiality is the foundation of ethical operations. We take care not to pass on confidential information about Nordic Morning or any of its companies or our clients without authorization. And when we do communicate about our company, capabilities or expertise, we do so accurately and truthfully.

We should also ensure that we do not accept bribes from or offer bribes to our partners. However, it may be acceptable for us to exchange gifts of small value if neither we, Nordic Morning nor the companies within Nordic Morning are compromised by doing so.

Finally, as representatives of Nordic Morning or its companies, we are politically neutral: we must not affiliate ourselves with or support political parties or politicians. Group companies may, however, have political parties as customers.



PARTNERS

We view suppliers and subcontractors as partners, and believe they should be fairly rewarded for the work they do. They should be treated equally and their services should be assessed objectively based on price, quality and reliability. We should also expect any partner we do business with to adhere to business principles that are consistent with our own.

As we fundamentally oppose illegal and unethical labor practices, we require our partners to do the same. We also respect the intellectual property of our partners – including patents, trademarks, trade secrets and similarly sensitive information – and require them to do the same in return.



CUSTOMERS

We boost our customers' success in a quickly changing operating environment. We create innovative communications solutions and content that help our customers to reach their stakeholders and communicate with them in a natural and efficient manner.

The relationship between us and our customers is based on trust. It follows that we will always treat the information we have about our customers confidentially. We would, for example, always seek a customer's approval before openly discussing or publicizing a product or service we had created for them.

When dealing with a complaint from a customer, we act quickly and professionally to assess the issue and resolve any problems as soon as we become aware of them. And in other aspects of our business, our communication should always be clear, honest and accurate.



RESPONSIBILITY

Nordic Morning's Corporate Responsibility program encompasses economic, social and environmental responsibility. Our key corporate responsibility themes are:

- Conducting profitable business: we strive for efficiency and long-term profitability to bring value to our stakeholders.
- Respect for people: our employees' talent, commitment and well-being are vital to our success.
- Being a good corporate citizen: we comply with laws and act responsibly toward our stakeholders and society.
- Reduced environmental impact: we work constantly to reduce our environmental impact and we enable our customers to do the same.



COMPLIANCE

Compliance with this Code of Business Ethics extends to all areas of our business, including decisions relating to trade, finance, investment, subcontracting, business development and other business and employment relationships.

Ultimately, the Board of Directors is responsible for ensuring that these principles are applied throughout Nordic Morning. The CEO is responsible for implementing these principles, supported by the Group management team. Day-to-day responsibility for promoting and implementing the Code of Business Ethics lies with each employee.

Any activity that is inconsistent with our Code of Business Ethics must be reported immediately, and the violation must be remedied as soon as possible and followed up with appropriate disciplinary action, up to and including termination of employment for those involved. The Group will ensure that there are no adverse consequences for employees who highlight breaches of the Code of Business Ethics.

Employees can report any allegations of potential violations confidentially, and even anonymously, to the Group CEO.

Nordic Morning policies and decision making are based on our core values and corporate governance. You can find the corporate governance guidelines and further information about our policies on reporting.nordicmorning.com

OUR POLICIES

Corporate Responsibility program

The Group's economic, social and environmental responsibility: <http://reporting.nordicmorning.com>.

Human Resources policy

HR supports Nordic Morning Group's personnel management and competence development. HR aims to ensure Nordic Morning and its subsidiaries are perceived as an attractive employer.

Communications policy

The role of communications is to provide key stakeholders with accurate and up-to-date information on Nordic Morning's objectives and operations. Our communications is consistent with our values and is done in an open and trustworthy manner.

Risk management

Regular monitoring of risks helps us to identify the risks threatening our business and react to them well in advance.

Environmental policy

We have had a systematic approach toward sustainability since the 1990s, and we continue to reduce the environmental impact of our operations through the Green Nordic Morning program.

Health and safety policy

We aim to provide a working environment that is safe and pleasant and that minimizes the risk of developing physical and psychological problems. The use of alcohol and illicit drugs is prohibited during work time. Nor should an employee's performance at work be affected by the use of any substance in their private time.

Social media policy

Group employees may use social media during work hours for work-related purposes. When using social media to communicate, we must not distribute disparaging or confidential information about Nordic Morning or its companies, partners, colleagues or other stakeholders.

Sponsorship policy

Sponsorship activities are coordinated by the parent company. All activities should be linked to our business and be aligned with our values.

IT policy

Our IT policy helps to ensure that the Group's IT resources are used responsibly and according to the law. The policy relates to all IT facilities and services provided by the Group.

NORDIC MORNING COMPANIES

The parent company **Nordic Morning Plc** in Helsinki, **Nordic Morning AB** in Stockholm, **Citat** in Stockholm, Gothenburg, Malmö, Copenhagen, Helsinki and Kharkiv, **Klikki** in Stockholm, Piteå and Helsinki, **Mods Graphic Studio** and **JG Communication** in Stockholm, **Edita Bobergs** in Falun, Veddesta and Västerås, **Edita Prima**, **Seed Digital Media** and **Edita Publishing** in Helsinki, **Educode** in Lahti as well as a partly owned company, **Brand Systems**, in Stockholm and Bangalore, India.



nordic
morning