

# ALMA

SUSTAINABILITY REPORT

2021



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# We inspire sustainable choices

Our sustainability work is a reflection of its time and now an even more integrated part of our operations. The importance of our mission of boosting the sustainable growth of individuals, companies and society was emphasised even further in the second year of the global COVID-19 pandemic. We listened to our employees carefully and ensured that our working environment is safe and healthy.

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 77 per cent. Our journey has improved our profitability while also changing our climate profile to a significantly more low-carbon one.

We updated our science based climate targets to even more ambitious ones. We committed to reducing the greenhouse gas emissions arising from our own operations (Scope 1 and 2) by 46 per cent and those arising from its subcontracting chain (Scope 3) by 14 per cent by 2030. In order to minimise our carbon footprint, we focus on further strengthening the environmentally sustainable impacts of our operations as well as on reducing emissions in our subcontracting chain. Besides setting ambitious climate targets for ourselves, we challenge all our service providers to do so as well.

Our most significant impact on society comes from our journalistic media. They increase societal awareness and understanding and provide practical examples of sustainable solutions for companies and individuals. Our media reach millions of Finns every week and almost one million professionals in their work. As the leading provider of services related to housing, automotive and recruitment services, we have a responsibility to lead by incorporating sustainable development into our digital services and helping our customers make increasingly sustainable choices in their lives.

In 2021, we specified the key focus areas of Alma Media's sustainability programme for the coming years. At the same time, we conducted an extensive materiality analysis in order to identify the key expectations our stakeholders have with regard to our operations. In the expectations of our stakeholders, efficient climate work to reduce emissions, high business ethics, data security in the use of our services, employee well-being and competence development as well as responsible media were highlighted. We specified measurable objectives for our sustainability work. These objectives are now a part of our employee incentive system as well.

Our values, sustainability objectives and operating principles are reflected in our work in 2022 as well, guiding our daily work. We hope that our cooperation partners also get excited and commit into cooperation in



order to promote sustainable development ambitiously, comprehensively and efficiently.

**Kai Telanne**  
President and CEO

Welcome to read our sustainability report for 2021!

# Sustainability year 2021

## JOURNALISM SUPPORTING SUSTAINABLE DEVELOPMENT

Iltalehti and our financial and professional media increased public awareness of environmental matters by publishing news and examples of practical solutions towards sustainable development.

Kauppalehti was the first media in Finland to offer Sustainalytics' ESG Risk Ratings to its subscribers.

## NEW SUSTAINABLE CHOICES

The Nettix acquisition brought more choice for consumers and introduced the circular economy services into our offering.

DIAS sped up the digitalisation of real estate transactions, and Suomen Tunnistetieto, Doks, joined the Alma family to ensure that our customer companies fulfil the requirements of the money laundering regulations in transactions.

Netello supplemented our digital marketing services.

## WE INVESTED ON DATA PRIVACY AND DATA SECURITY

We continued the further development of data security in our services in 2021 and were meticulous about privacy protection.

We were not subject to any serious data breaches or violations of privacy protection.

We regularly trained our employees on the processing of data, data privacy and data security.

## WE TAKE CARE OF OUR EMPLOYEES

We ensured that our employees had a healthy and safe working environment and listened closely to their wishes.

We added flexibility by introducing the multi-locational working model.

We developed the competence and leadership of Alma's employees through numerous training and coaching programmes.

## WE COMMITTED TO THE 1.5°C TARGET

We updated Alma Media's SBTi target. Alma Media commits to reducing the greenhouse gas emissions arising from its own operations (Scope 1 & 2) by 46% and from its subcontracting chain by 14% by 2030.

Our target is in line with the global limit value for global warming, 1.5 degrees Celsius.

## WE UPDATED OUR SUSTAINABILITY PROGRAMME

We specified the key focus areas of Alma Media's sustainability programme for the coming years. We conducted an extensive materiality analysis amongst our stakeholders to support our strategy work.

We developed our socially and environmentally aware operations, competence and new ESG-based products and services.

# Alma Media's sustainability programme

## SUSTAINABLE ALMA MEDIA AND SUSTAINABLE BRANDS

### PROFITABLE GROWTH AND HIGH BUSINESS ETHICS

The profitability of operations is a prerequisite for our sustainable growth. We expect high integrity and ethics of ourselves and our cooperation partners and do not accept violations of human rights, discrimination, harassment or corruption.



### FUTURE-FIT WORKFORCE

We promote the diversity of our work community and the realisation of experiences of equality and participation.  
  
We provide development opportunities for our skilled employees.



### ENVIRONMENTAL RESPONSIBILITY

We minimise the greenhouse gas emissions of our own operations and our subcontracting chain.  
  
We set an example of the transition to low-carbon digital business in the media sector.



### RESPONSIBLE MEDIA, JOURNALISM AND MARKETING

We take responsibility for our contents, correct any errors and defend the freedom of speech.  
  
Reliable, pluralistic and independent journalism is a precondition for functional democracy in our society.



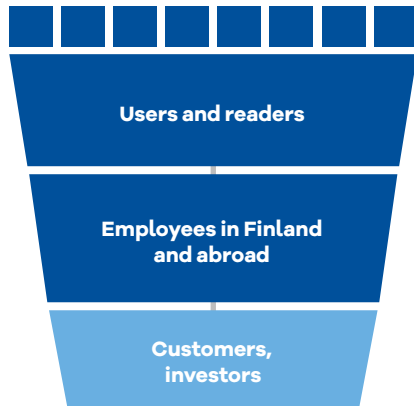
### RESPONSIBLE SERVICES AND MARKETPLACES

We develop new products and services and use data responsibly. Our automobile, housing, education and recruiting brands allow sustainable choices in business operations and private consumption.



# Materiality analysis

## STAKEHOLDER SURVEY AND INDIVIDUAL INTERVIEWS



Workshops (9)

Alma Media updated its materiality analysis in autumn 2021 to identify the expectations its key stakeholders have towards sustainability work. The analysis was based on an extensive stakeholder survey, sector analyses, interviews of individuals and workshops for employee groups.

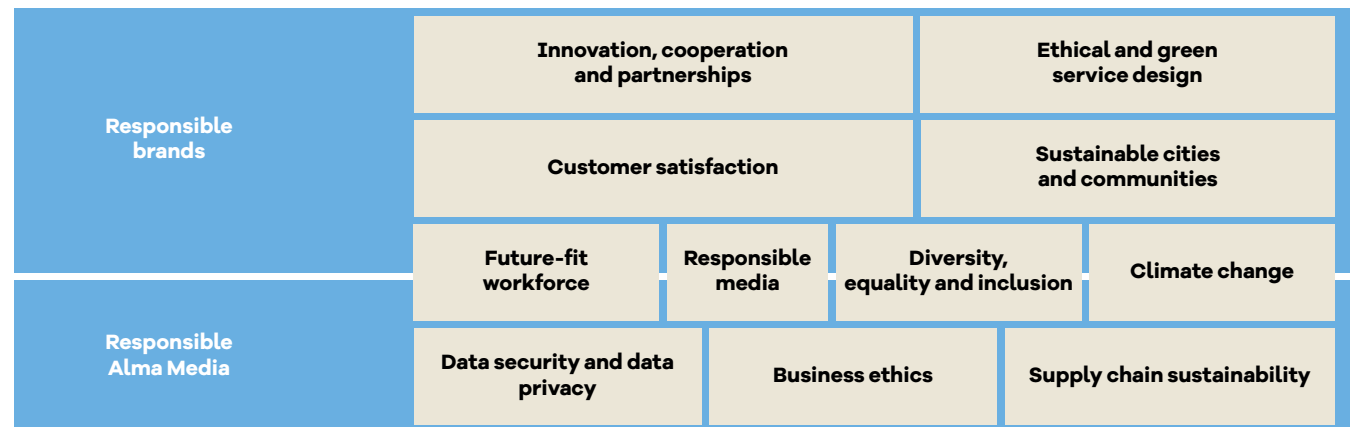
Over 1,000 readers of our media and users of our services as well as over 500 Group employees responded to the survey in October–November 2021. In addition, we organised several internal discussion forums and nine workshops with internal and external specialists in order to determine the objectives of Alma Media's

corporate sustainability programme. The materiality analysis led to the definition of 11 sustainability priorities for Alma Media. These 11 focus areas were inspected at two levels: sustainable Alma Media and sustainable brands.

All the stakeholders found that Alma Media's transformation to digital media was a positive thing and recognised the Group's earlier sustainability work. The importance of data security and data privacy for Alma Media, the responsible processing of customer data and sustainability in the development of new business were highlighted in the stakeholder responses.

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.



# Stakeholder interaction

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	<ul style="list-style-type: none"> <li>• Online survey to all employees</li> <li>• Workshops and discussion forums with different employee groups</li> </ul>	<ul style="list-style-type: none"> <li>• Employee well-being, appreciation and equal treatment</li> <li>• Competence development and support for career opportunities</li> <li>• Profitable and stable business</li> <li>• Sustainability in the development of new products and services</li> <li>• Reliable and fair management communications</li> <li>• Code of Conduct and anticipation of risks</li> </ul>
Readers, users, consumers	<ul style="list-style-type: none"> <li>• An online survey for the readers and users of the biggest media and websites</li> </ul>	<ul style="list-style-type: none"> <li>• Reliability of information, journalistic integrity and accuracy of contents</li> <li>• Promoting societal discussion and freedom of speech</li> <li>• Preventing misleading and false advertising</li> <li>• Observing the laws and regulations in the collection and processing of personal data</li> <li>• Taking care of the data security and data privacy of services</li> <li>• Responsible processing and utilisation of customer data</li> </ul>
Customers, advertisers	<ul style="list-style-type: none"> <li>• Operational analyses of the most relevant customer industries for our revenue and individual interviews with representatives of the companies</li> </ul>	<ul style="list-style-type: none"> <li>• Good environmental risk management</li> <li>• Emphasising social sustainability and good governance in Alma’s international business</li> <li>• Ensuring competent workforce in the digital transformation</li> <li>• Ensuring the ethics of advertising and the brand safety of our own advertising platforms</li> </ul>
Investors, shareholders, analysts	<ul style="list-style-type: none"> <li>• Analyst interviews</li> </ul>	<ul style="list-style-type: none"> <li>• Market environment and competitive landscape, objectives, reporting, strategy and financial position</li> <li>• Adequate and balanced sharing of financial and non-financial information about the Group</li> <li>• Responding to increasingly tight sustainability requirements</li> <li>• Alma Media’s sustainability story as a part of the equity story</li> <li>• Building sustainable business growth</li> </ul>
Suppliers, subcontractors	<ul style="list-style-type: none"> <li>• Interviews with the managers of key purchasing sectors (printing, delivery and ICT)</li> </ul>	<ul style="list-style-type: none"> <li>• Fair and equal treatment, equitable, open and transparent supplier requirements</li> <li>• Alma Media’s procurement policy and Code of Conduct for suppliers</li> <li>• Cooperation to minimise greenhouse gas emissions in the partner network</li> </ul>
Media	<ul style="list-style-type: none"> <li>• Desktop analysis and interviews of the Editors-in-Chief of the biggest media</li> </ul>	<ul style="list-style-type: none"> <li>• Responsible journalism and marketing, high quality of data</li> <li>• Data privacy and data security according to the laws and regulations</li> <li>• Openness, transparency and proactivity in the offering of information</li> <li>• Accuracy of contents</li> <li>• Quick response and replying to enquiries</li> </ul>
Society and the authorities	<ul style="list-style-type: none"> <li>• Sector and desktop analysis</li> </ul>	<ul style="list-style-type: none"> <li>• Observing the laws and regulations in the collection and processing of personal data</li> <li>• Taking care of the data security and data privacy of services</li> <li>• Responsible processing and utilisation of customer data</li> </ul>

# The UN Global Compact initiatives relevant for Alma Media

The UN Global Compact initiatives cover the global challenges shared by us all. Alma Media is committed to supporting sustainable growth in society, for companies and for individuals, and based on our materiality analysis, we have included nine UN Global Compact targets in our updated sustainability programme that are linked to our possibilities of influence.



We focus on the competence development of our employees and support personal career development by providing many kinds of training and coaching. Our book and training offering enable our professionals to learn more about, for instance, data privacy, risk management, communications, the law or the environment and construction.



Our media report on sustainable development innovations, the financial results obtained with them and the latest research. They also publish examples of solutions related to sustainability in companies. We support the generation of innovations in the Alma Media organisation by developing an agile, open and interactive corporate culture and a team spirit.



The carbon footprint of our own operations was already small, and we have cut it in half within the past five years. We set an example in the industry of the transition to low-carbon society. We continue to minimise our own environmental impacts and encourage our subcontracting chain to commit to our climate targets.



Our media increase awareness and understanding of the importance of equal working life in society. We offer equal opportunities for development for all, and we cherish gender equality, the development of diversity and our participation in our work community.



We provide opportunities for sustainable choices in our housing marketplaces, services for industry professionals and digital real estate transactions that allow promoting sustainable development in the sector in cooperation with industry operators. We bring together the service providers in the value chain and the consumers in an ecosystem where value is created through synergies.



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



Our financial and professional media focus on the promotion of sustainable financial growth in companies and in society. Alma Media has approximately 1,500 employees, and it is an employer and a taxpayer in 11 European countries. In cooperation with different operators in society, our recruiting services build a bridge between young people and the working life, develop the abilities of young people for the future working life and promote the employment of people with reduced work ability.



Our media publish news about the environmental impacts of different industries and increase awareness of sustainable choices in consumption decisions. We seek to maximise the positive environmental impacts of our operations and inspire consumers into making sustainable choices. The environmental search criteria of our digital housing and automobile services enable choosing energy-efficient housing or a low-emission vehicle.



Our media and services are widely connected to companies operating in the housing, HR and automobile industries, for example. Numerous sustainable development projects bring us together with our customers in 11 European countries. We are careful when choosing cooperation partners for Alma Media and require that our subcontractors commit to socially and ethically sustainable business operations.



SUSTAINABLE  
ALMA MEDIA



# Management of corporate sustainability

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

Quality education (UN Sustainable Development Goal 4) and Gender equality (Goal 5), Decent work and economic growth (Goal 8), Industry, innovation and infrastructure (Goal 9), Sustainable cities and communities (Goal 11, related to the Group's significant business in the Finnish housing market), Responsible consumption and production (Goal 12, related to the ability of consumer media and services to affect the choices made by consumers), Climate action (Goal 13), Peace, justice and strong institutions (Goal 16, related to the media's operations as an institution in society) and Partnerships for the goals (Goal 17, related to Alma Media's ability to make an impact on environmental matters and the sustainable development of the society in cooperation 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.

- Code of Conduct
- The corporate sustainability programme and its targets
- Disclosure policy
- Insider guidelines

- Procedures for related party transactions
- Data security policy
- Data privacy guidelines and principles
- Tax policy
- Investment and financing policy
- Procurement policy
- Equality and non-discrimination principles and equality and diversity plans
- Career development principles
- Remuneration principles and remuneration policy
- Contractual terms and terms of sale concerning the advertising customers of Alma Media's media sales
- The Board of Directors' diversity policy
- The Group's climate targets based on the Science Based Targets initiative

Guidelines created by external parties:

- The Council for Mass Media Guidelines for Journalists and basic agreement
- The marketing rules of the International Chamber of Commerce
- Principles concerning good marketing practices
- Europe-wide self-regulation of targeted online advertising (OBA self regulation)
- Guidelines by the IAB digital marketing network, including the IAB Europe Transparency & Consent Framework v2.0 (TCF)
- The UN Global Compact initiative and the UN Sustainable Development Goals

## MANAGEMENT OF RESPONSIBILITY AT ALMA MEDIA

Alma Media's Board of Directors discusses corporate sustainability matters, for example, when

assessing the risks related to the business and when approving the Group's statement of non-financial information. The Group Executive Team manages the development of responsibility and is in charge of the Group's responsibility strategy and the implementation of the objectives in the business units and in the Group operations. 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 responsibility programme. The progress of the sustainability programme in the Group Executive Team is coordinated by the SVP and the team of communications and brand. Business functions are supported in the setting of objectives and achieving sustainability targets, as well as communications.

## MANAGEMENT OF RISKS RELATED TO SUSTAINABILITY

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

## STAKEHOLDER INTERACTION

Interaction with various 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 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). Alma Media's most important social partner during the year under review 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 independence and impartiality with respect to various stakeholder interests.

# 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 operating principles are documented in

Alma Media's Code of Conduct. The Code of Conduct forms the basis of the Group's responsible approach to business. Digital learning materials pertaining to the Code of Conduct are included in the induction training of employees. Subcontractors are trained and informed of Alma Media's Code

of Conduct and responsibility programme in an appendix to supplier agreements. 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's employees and stakeholders have access to an anonymous whistleblowing channel for reporting any observations of misconduct.

**Table 1: Business ethics**

Definition	Progress	Definition
Alma Media does not condone the use of unethical business practices by its employees or suppliers, condemns corruption and bribery as well as 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.
<b>Strategic intent:</b>		<b>Strategic intent:</b>
Alma Media's employees and subcontractors have taken the Group's Code of Conduct training and committed to observing it in everything they do.		There are no violations of the Group's Code of Conduct amongst the company's employees or its subcontracting chain.
<b>Objectives for 2021</b>		<b>Objectives for 2022</b>
Alma employees in all the countries of operation take the updated Code of Conduct training.	By the end of 2021, 90% of Alma employees have taken the Group's updated Code of Conduct training.	All Alma employees in all 11 countries complete the updated Code of Conduct training.
The subcontracting chain is committed to observing Alma Media's Code of Conduct.	Alma Media required its key subcontractors to provide documentation about the sustainable production of their products and services. Alma Media decided to implement the new Code of Conduct training for subcontractors in 2022.	50% of Alma Media's key subcontractors have committed themselves to taking the Code of Conduct training.
The Whistleblow channel is made available to third parties as well as to Alma Media employees.	The Whistleblow channel was opened to parties outside the Group as well in 11 languages.	The Whistleblow 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 2021. There are also no investigations related to Alma Media by the authorities in progress at present.	Risk management will be improved further by reviewing the risk profile in Alma Media's operating areas and, if necessary, communications and training will be enhanced.

Alma Media's whistleblowing team 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. The Group's executive management is responsible for the regulatory compliance, ethicality and transparency of business operations.

#### **ALMA MEDIA'S TAX FOOTPRINT IN 2021**

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. 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 15 per cent in Latvia and Lithuania 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 22 of the Report by the Board of Directors describes the added value created by Alma Media to its stakeholders.

#### **ACHIEVEMENT OF SUSTAINABILITY TARGETS IN 2021**

Alma Media has a zero tolerance policy for unethical business conduct. The Group reports annually on whether any such incidents have occurred. In the review year, the Group was made aware of one (1) case of potential violation of the company's Code of Conduct through the Whistleblow channel. This suspicion was cleared after an investigation, but the internal processes of the company in question were clarified further.

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.

There were no incidents of corruption or anti-competitive behaviour at Alma Media in 2021.

There are also no investigations by the authorities in progress at present. During the year under review, Alma Media 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 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.

#### **OTHER DEVELOPMENT PROJECTS DURING THE YEAR**

During the year under review, 90% of Alma Media's employees in Finland and abroad completed the renewed Code of Conduct training. The Code of Conduct addresses legal compliance, the disclosure of information, conflicts of interest, gifts, anti-bribery and operating practices

pertaining to employees, human rights and the environment. The Code of Conduct also addresses stricter regulations concerning topics such as data privacy, anti-money laundering legislation and the prevention of tax evasion. At the same time, the significance of workplace diversity and inclusivity is underscored. Risk management, monitoring and reporting processes were developed by introducing an external Whistleblower channel for reporting potential misconduct.

#### **FOCUS AREAS FOR THE DEVELOPMENT OF SUSTAINABILITY IN 2022**

In 2022, the Group's subcontractors will be committed to a course in the Code of Conduct covering Alma Media's supplier relationships. The goal is to get at least 50% of the Group's most significant subcontractors to take the new Code of Conduct training. 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.

# Climate change

Based on its materiality assessment of sustainability, Alma Media has determined that the Group's strategic decision to invest in digital business has mitigated its short-term and medium-term risks related to climate change. The progress of the digital transformation of the Group's business reduces the greenhouse gas emissions of its own operations and its subcontracting chain, while the transition to a low-carbon society creates business opportunities and improves resource efficiency.

Digital sources now represent approximately 77 per cent of Alma Media's business, or approximately MEUR 212. For over a decade now, the Group has implemented a strategy based on the controlled digital transformation of its business. The regional media business, which relies on print products, was divested during the period 2015–2021. At the same time, the Group has systematically invested in new digital services, most recently by acquiring the Nettix services in 2021. During the past five 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 Group's annual capital expenditure under the digital business model amounts to MEUR 3–4. The transition from print to digital was a significant factor affecting the Group's improved profitability in

2016–2021. 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. The increasingly digital business model allows Alma Media to be more resource-efficient, enables more environmentally friendly choices for consumers and contributes to promoting the circular economy through its services and content.

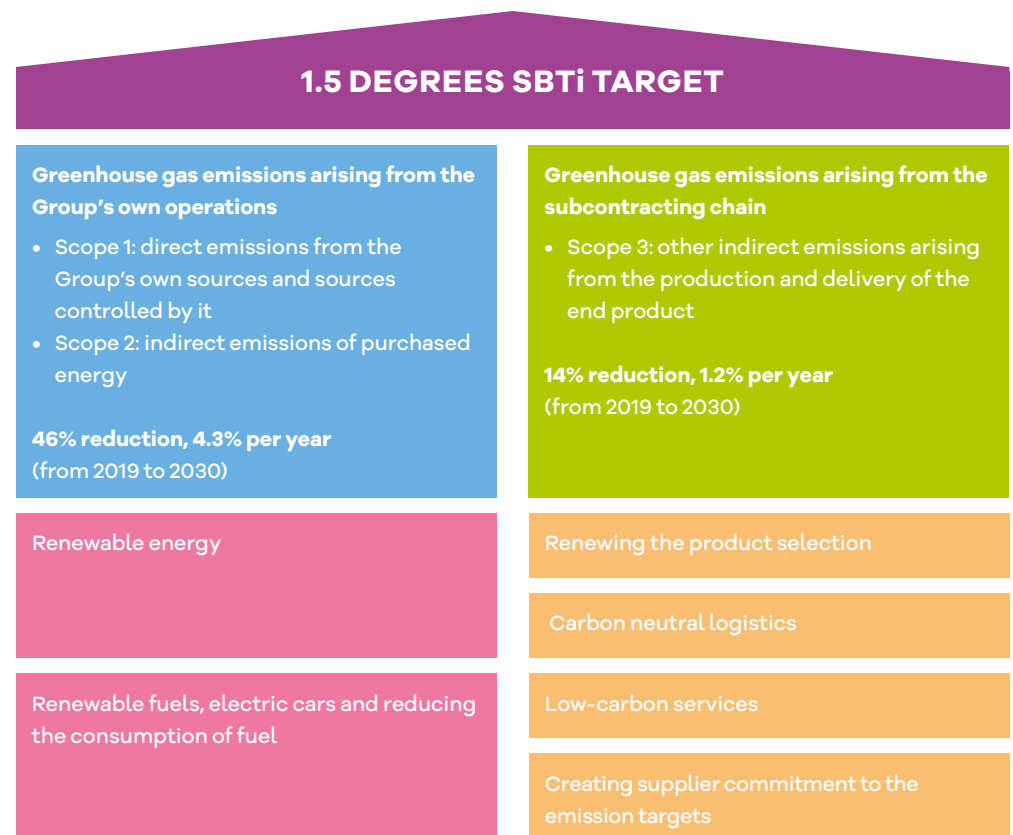
## MANAGEMENT OF ENVIRONMENTAL RESPONSIBILITY

Alma Media updated its climate objectives in November 2021. They cover the greenhouse gas emissions of Alma Media's own operations (Scope 1 and 2) as well as those of its subcontracting chain (Scope 3). The targets are in line with the Science Based Target initiative, which means that the Group is committed to the initiative that aims to limit climate warming globally to at most 1.5°C. Alma Media is committed to reducing its absolute Scope 1 and Scope 2 greenhouse gas emissions by 46 per cent by 2030 compared to 2019, the last year preceding the pandemic. Emission reduction efforts are particularly targeted at reducing emissions from company cars, electricity, district heating and district cooling. Alma Media is also committed to reducing greenhouse gas emissions in its

subcontracting chain (Scope 3) by 14 per cent, focusing on the reduction of emissions from the printing of publications and the purchasing of logistics services, for example. 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

(Scope 1 and 2), while 96 per cent arise in the subcontracting chain.

In 2016, Alma Media was the third media company in the world to establish science-based climate targets. The validation of the SBTi target updated in autumn 2021 is pending approval by the Science Based



Targets organisation. Alma Media's Board of Directors and Group Executive Team monitor the company's progress towards the environmental sustainability targets specified in the sustainability programme. Business unit management and function-specific key persons, such as the specialists responsible for procurement and spatial design, operate under the executive directors. Alma Media's 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.

### ACHIEVEMENT OF SUSTAINABILITY TARGETS IN 2021

According to Alma Media's SBTi targets set in 2016, the Group aims to reduce its greenhouse

gas emissions arising from the consumption of electricity, district heating and district cooling (Scope 2) and the emissions arising from fuel consumption (Scope 1) by 21% by 2025. Indirect greenhouse gas emissions arising from procurement (Scope 3) need to be reduced by 10% by 2023. Progress with respect to the latter target is reported on page 16 (supply chain sustainability).

To improve the reliability and continuity of emission calculations, Alma Media adopted the International Energy Agency IEA's country-specific emission factors 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 2016–2021 have also been adjusted to only

reflect the Group's continuing operations. The reporting of environmental figures covers all of Alma Media.

The Group achieved its emissions target concerning its own operations (Scope 1 and 2), i.e. real estate and cars, already in 2019. Emission reductions continued in the year under review, and the Scope 1 and Scope 2 emission reported by the Group reduced by 52% from 2016.

As in 2020, the lower emissions in 2021 were significantly influenced by the global COVID-19 pandemic that continued during the year, the restrictions on movement related to preventing the spread of the virus and the national remote work recommendations. The main reason for the reduction in emissions

from properties is Alma Media's switch to zero-emission electricity and district cooling at its properties in Finland. The purchasing of zero-emission hydropower electricity continued in 2021.

Table 2 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 own operations. The energy consumption of properties controlled by the Group totalled 3,226 MWh of electricity, district heating and district cooling. Renewable energy accounted for 62% of this. The fuel consumption of cars owned and used by the company decreased by 14.4 per cent from the previous year. The decrease in the energy consumption of company cars was mainly

Table 2: Alma Media and the environment	Unit	2016	2017	2018	2019	2020	2021
<b>Amount of energy</b>							
Petrol	GJ	4,393	5,152	5,188	5,005	2,535	2,399
Diesel	GJ	1,290	1,429	1,397	1,235	1,757	1,531
Electricity	GJ	9,261	9,413	9,078	8,079	6,648	6,039
District heating and district cooling	GJ	4,770	5,056	5,461	4,848	3,916	5,576
<b>Emissions</b>							
<b>Direct emissions (Scope 1)</b>		tCO <sub>2</sub> -eq					
Fuels		384	450	450	426	287	260
<b>Indirect emissions (Scope 2)</b>		tCO <sub>2</sub> -eq					
District heating, district cooling and electricity, market-based method		746	713	613	447	351	282
District heating, district cooling and electricity, location-specific method		702	657	720	566	454	468
Share of renewable energy, Scope 1 and Scope 2		0%	0%	12%	27%	33%	47%
Share of renewable energy, Scope 2		0%	0%	18%	40%	46%	62%
Scope 3	tCO <sub>2</sub> -eq	17,449	19,312	18,016	17,365	15,139	15,062

attributable to the restrictions on mobility introduced in response to the COVID-19 pandemic and Alma Media's employees increasingly switching to remote work.

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. The fuel consumption data for Alma Media's company cars and cars that fall under an unlimited car benefit has been primarily collected from service providers. Emission calculations are based on the actual consumption of fuel. The fuel litres

purchased are multiplied by fuel type-specific emission coefficients by the country of use. Scope 1 emissions consist primarily of carbon dioxide emissions (CO<sub>2</sub>). 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 2021, the Group's greenhouse gas emission intensity was 0.3 tCO<sub>2</sub>-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 arising from the consumption of electricity, district heating and district cooling (Scope 2 emissions) at the company's properties in Finland decreased by 19.6 per cent from the comparison year, to 282 tCO<sub>2</sub>-eq, calculated using the market-based method. Comprehensive remote work of employees and the reduced utilisation rate of properties reduced the Group's greenhouse gas emissions, on average, by 39% in 2020 and 2021 compared to the average of the two preceding years (2018 and 2019). Energy consumption is measured using country, type and supplier-specific emission coefficients.

### MANAGEMENT OF RISKS RELATED TO CLIMATE CHANGE

The restrictions on movement and the labour shortages caused by the pandemic in the short term increase challenges related to

the printing and distribution of newspapers and magazines in the subcontracting chain. Warmer winters will also complicate the harvesting of wood by the paper suppliers that operate as Alma's subcontractors, which may lead to higher paper prices. Increasingly strict national and EU-level climate regulations may also have cost impacts in Alma Media's subcontracting chain. Changes involving paper and delivery costs have an effect on the costs of print publications, for example. In the longer term, increasing extreme weather phenomena caused by climate change are predicted to increase the risk of technical disruptions to digital services in Alma Media's various operating countries. Alma Media manages its environmental risks by systematically developing its operations in accordance with the Group's SBTi climate targets and by

**Table 3: Climate change**

Definition 2021	Progress made in 2021	Definition 2022
According to the SBTi target of 2°C limit set in 2016, the greenhouse gas emissions arising from own operations (Scope 1 and 2) must decline by 25% by 2025.	Alma Media has achieved the SBTi targets set for its own operations. In 2021, we set new SBTi climate targets for 2030.	According to the SBTi target of a 1.5°C limit set for 2030, the greenhouse gas emissions arising from own operations (Scope 1 and 2) must decline by 46% since 2019.
<b>Strategic intent:</b>		<b>Strategic intent:</b>
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.
<b>Objectives for 2021:</b>		<b>Objectives for 2022:</b>
Reduction of direct (Scope 1 and 2) emissions by 25% by 2025 (properties, energy, company cars, fuel).	In 2021, the Group's direct (Scope 1 and 2) greenhouse gas emissions reduced by 52% compared to 2016.	Reduction of direct (Scope 1 and 2) emissions by 4.3% from 2021 (properties, energy, company cars, fuel).
Reduction of indirect (Scope 3) greenhouse gas emissions arising from the subcontracting chain by 10% from 2016 to 2023.	Indirect (Scope 3) greenhouse gas emissions reduced by 13.7% from 2016 to 2021.	Reduction of indirect (Scope 3) greenhouse gas emissions by 1.2% from 2021.

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. 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.

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 173.

**FOCUS AREAS FOR THE DEVELOPMENT OF SUSTAINABILITY IN 2022**

Alma Media has updated its SBTi targets and committed to reducing the emissions arising from its own operations by 46% and those arising from its subcontracting chain by 14% by 2030.

Achieving the SBTi target corresponds to an annual emissions reduction of 4.3% in the Group's own operations and a reduction of 1.2% in its subcontracting chain. The Group seeks to have its targets validated by the SBTi organisation in 2022.



# Supply chain sustainability

## FOCUS AREAS FOR THE DEVELOPMENT OF SUPPLY CHAIN SUSTAINABILITY IN 2022

Alma Media updated its science-based climate targets in 2021. Achieving the Group's SBTi target requires a reduction of greenhouse gas emissions arising from the subcontracting chain by 14% by 2030 compared to 2019. According to this target, the emissions arising from the subcontracting chain must decline by 1.23% 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. 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 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 2021.

To develop sustainability in its subcontracting chain, Alma Media has set a target for 2022 to get at least 50% of its key subcontractors to commit to completing the Company's Code of Conduct training. The Group's most significant subcontractors are certain ICT, printing and delivery suppliers. Continuous procurement from these suppliers correspond to 43 per cent of the Group's procurements in Finland. Correspondingly, the share of procurements related to content generation of all the procurements made in Finland was 18 per cent in 2021. 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 2021

According to the science based target concerning Alma Media's indirect greenhouse gas emissions arising mainly from purchasing (Scope 3 emissions) set in 2016, the company must reduce its emissions by 10 per cent by 2023. Alma Media's indirect Scope 3 emissions continued on a downward trend during the year as the circulations of print publications continued to decline and consumers switched from print to digital media. In addition, the mobility restrictions introduced due to the COVID-19 pandemic reduced air travel by Alma Media employees in 2021 by more than 77 per cent compared to 2019. Emissions were decreased by the lower use of services resulting from the reduced utilisation rate of transport services, distribution, aviation emissions and business premises. Due to reduced purchases alone, the Group's indirect Scope 3 emissions declined by 9 per cent (1,195 tCO<sub>2</sub>e) compared to 2016. The

SBTi 2030 Scope 3: -14 % comparison year 2019

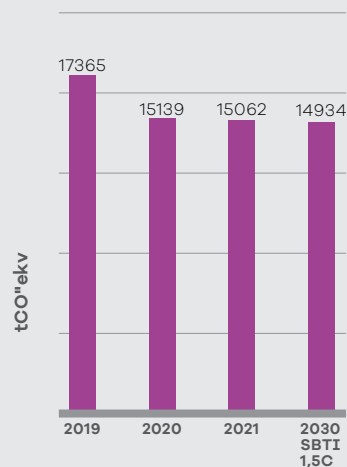


Table 4: Other indirect emissions (Scope3)	tCO <sub>2</sub> -eq	2016	2017	2018	2019	2020	2021
Purchased products and services		13,203	15,083	13,971	13,417	11,591	12,008
Product transport and service (upstream)		3,801	3,781	3,540	3,476	3,257	2,778
Business travel		159	189	182	165	23	37
Commuter traffic		4	4	3	3	3	3
Use of products sold		158	143	224	211	192	169
Disposal of products sold		123	113	96	93	74	67
<b>Total Scope 3 emissions</b>		<b>17,449</b>	<b>19,312</b>	<b>18,016</b>	<b>17,365</b>	<b>15,139</b>	<b>15,062</b>

calculation of emissions associated with the final recycling of publications covers all of Alma Media's newspapers, magazines and books. Alma Media reports the figures for ongoing business.

Alma Media continued to engage in active dialogue with subcontractors to reduce emissions and started development projects with several significant 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 approximately 2,000 subcontractors. The largest group comprises small enterprises that primarily provide content

production services to Alma Media's editorial offices. The Group's 23 key subcontractors accounted for 62 per cent of the total purchases, and 11 operators of these accounted for 52 per cent of the total purchases. These mostly consist of providers of delivery, 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 MEUR 90.

Alma Media's indirect greenhouse gas emissions declined during the year under review to 15,062 tCO<sub>2</sub>-eq (2020: 15,139 tCO<sub>2</sub>-eq). Compared to 2016, the Group's Scope 3 emissions have declined by 13.7 per cent in total. 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 factors in 2021 for those instances where an energy producer-specific emission factor has been unavailable. The emission figures for 2016–2020 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's 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<sub>2</sub>).

**Table 5: Supply chain sustainability**

Definition 2021	Progress made in 2021	Definition 2022
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 monitored the sustainability of its suppliers by conducting audits on their premises or by requiring documentation regarding the sustainability of the services or products they produce. The energy consumption arising from business premises and business travel by air decreased due to the COVID-19 pandemic. As a result of the reduction in purchases, the Group's Scope 3 emissions declined.	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.
<b>Strategic intent:</b>		<b>Strategic intent:</b>
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.
<b>Objectives for 2021:</b>		<b>Objectives for 2022:</b>
Alma Media's subcontracting chain engages in socially and ethically sustainable business.	Alma Media was not made aware of any breaches of the ethical conduct of business, such as a violation of human rights or incidents of bribery or discrimination in its subcontracting chain companies in 2021.	50% of Alma Media's key subcontractors have committed themselves to the Group's Code of Conduct.
According to the SBTi target set in 2016, the greenhouse gas emissions arising from the subcontracting chain must decline by 10% by 2023.	The greenhouse gas emissions arising from the subcontracting chain reduced by 13.7% from 2016 to 2021. The Group set new targets in accordance with the 1.5 degrees Celsius limit in order to reduce the emissions arising from its subcontracting chain.	Reduction of greenhouse gas emissions by 1.2% from 2021.

# Data security and data privacy

Almost 80 per cent of Alma Media's revenue now comes from digital sources. The Group takes a long-term approach to the development of its online services and aims to offer secure and diverse services to consumers and advertisers. 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.

To ensure the high quality of its digital services, Alma Media focuses on digital business development in its investments. The development of digital business is also supported by actively monitoring changes in regulations pertaining to data privacy and data security as part of the Group's risk management and by strengthening the employees' digital competencies as well as their knowledge of data protection and data security. 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 privacy and data security recommendations and regulations as well as maintaining the appropriate level of employee competence pertaining to data protection and data security.

Since Alma Media's business environment in Europe is constantly changing, Alma Media regularly reviews the risks affecting data security, and its opportunities to respond to the risks in the changing environment are improved as necessary to reduce the risks.

To mitigate the risks observed (with respect to external as well as internal threats), the integration of foreign units to the Group network was started in 2021. Once completed, this will bring all the units under the same data security policy, data security controls and 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. The data of online service users is only used in Alma Media based on the user's consent and primarily to deliver the service ordered by the user, to improve the user experience and to respond to user expectations. As a second priority, user data is utilised to target advertising or content relevant to the user based on their areas of interest and behaviour, for example.

In digital advertising, Alma Media observes the IAB's self-regulation principles and uses a consent management solution that is in line with the Transparency & Consent Framework

programme. To increase transparency, a Consent Management Platform (CMP) tool is used in Alma Media's consumer and business services. The Group observes its legal obligation to privacy protection in order to safeguard the privacy of the users. The practices related to ensuring privacy and the purposes for which information is used are described in the Group's privacy policy at <https://www.almamedia.fi/en/tietosuojadata-privacy/>

## ACHIEVEMENT OF SUSTAINABILITY TARGETS IN 2021

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.

The first target is that there should be no serious data security or data privacy breaches in the company's online services. During the year, the Group gave the data protection authority four (4) notices of data security breaches concerning approximately 1,000 people in total. The Group received five (5) requests for clarification. 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. The COVID-19 pandemic, which has continued for the second year already, also influenced the use of media content and digital services, as visitor volumes reached record highs. In spite of the increased user volumes, there were no service disruptions in Alma Media's services, and a high level of data security and data privacy was maintained in 2021 as well.

Alma Media's other target related to the security of online services currently covers Alma Media's Finnish business operations. The target is that Alma Media should organise at least four training events on data privacy and two general training events on data security for its employees each year. The training was organised as planned in 2021. In addition, there were two data privacy courses for software developers that also included a supplementary online training.

## OTHER DEVELOPMENT PROJECTS DURING THE YEAR

Alma Media continued to actively participate in the cybersecurity-related cooperative bodies of ISAC (Information Sharing and Analysis Centre) groups. In 2021, Alma Media developed its business comprehensively. Ensuring data security, both in terms of divested services and the new services integrated to Alma Media, was a major part of the Group's data security operations.

The data security of the cloud environments used for Alma Media's commercial services was improved in 2021 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. Data security and data privacy 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.

At the end of the year under review, Alma ID was in use in 27 services and there were more than 900,000 registered users in total. The single sign-on solution will be expanded to cover all of Alma Media's services in Finland. Data collected with the consent of

a registered user is more durable in terms of time and higher in quality than data based on cookie-based targeting. It also enables a better customer experience for users and more valuable and precise target audiences for advertisers. High-standard and information secure technology is used in Alma ID's single sign-on. User data is stored in data security audited environments and the company observes the obligations stipulated by the applicable data privacy legislation in processing the data.

**FOCUS AREAS FOR THE DEVELOPMENT OF SUSTAINABILITY IN 2022**

With regard to the current focus areas — data security and data privacy — resources in 2022 will be particularly allocated to the continued development of managing registered information requests and the Group's monitoring capabilities pertaining to data security. The new digital training platform will be used to continuously strengthen the data privacy and data security competencies of the Group's employees.

Table 6: Data security and data privacy		
Definition 2021	Progress	Definition 2022
Data security and data privacy are cornerstones of Alma Media's sustainability. 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 commercial 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 privacy are cornerstones of Alma Media's sustainability. 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.
<b>Strategic intent:</b>		<b>Strategic intent</b>
We ensure the safe use of the leading services in the market and avoid serious data security breaches.		We ensure the safe use of the leading services in the market and avoid serious data security breaches.
Objective for 2021	Progress made in 2021	Objective for 2022
There are no serious data security breaches in our services.	There were no serious data security breaches in our services in 2021.	There are no serious data security breaches in our services.
We organise at least four data privacy trainings and two data security trainings for our employees.	We organised at least four data privacy trainings and two data security trainings for our employees. In addition, we organised two data privacy trainings for software developers, supplemented with an online course.	Continuous training of employees to develop data privacy 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 from 500,000 to 900,000 in 2021.	Automation of the availability of own user data for registered users.
Proactive development of data security and data privacy to prepare for data security attacks.	We primarily focused on ensuring the data security of the Group's new business.	Improving automation to prepare for data security attacks in the Group's own development and training of subcontractors.
There is no downtime in our services.	There was no downtime in our services.	There is no downtime in our services.

# Diversity, equality and inclusion

## DEVELOPING AN EQUAL AND DIVERSE WORK COMMUNITY

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 two-year 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 are entitled to receive fair and rewarding compensation, have opportunities to develop their skills and abilities, receive feedback, remain informed about the company and work in a safe, pleasant, renewal-oriented and developing environment where everyone’s privacy and private life are respected. In accordance with the Group’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 2021

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 five (5) suspected incidents of bullying or sexual

Table 7: Diversity, equality and inclusion

Definition 2021	Progress made in 2021	Definition 2022
We do not condone harassment or discrimination related to age, gender, race, skin colour, nationality or ethnic origin, religious beliefs, convictions, family relationships, sexual orientation or disabilities.	Alma Media’s Code of Conduct strictly prohibits all discrimination and harassment at the workplace. The new Code of Conduct was launched for the employees in course format in 2021. 90% of our employees took the course.	Alma Media employees feel that the Group promotes equality, diversity and experiences of participation. All types of harassment, discrimination or bullying is prevented efficiently, and any shortcomings are corrected swiftly.
<b>Strategic intent:</b>		<b>Strategic intent:</b>
Alma Media employees find that our HR policy promotes equality and prevents harassment, bullying and discrimination.		A positively developing experience of the realisation of equality, diversity and inclusion in the work community.
<b>Objectives for 2021:</b>		<b>Objectives for 2022:</b>
Zero tolerance against harassment and discrimination: There are no incidents of improper treatment amongst Alma Media employees.	A total of five (5) suspected incidents of improper behaviour were reported in 2021. 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 employees.
Increasing awareness of and the significance of diversity and inclusion in the work community.	625 employees participated in workshop training aimed at increasing awareness of the significance of diversity in the work community as a resource.	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.

harassment were reported in 2021. All of the incidents reported to the company were thoroughly investigated. The necessary measures were taken and all five 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 six members in 2021. One of them was a woman

(16.7%). Three of the Board members were approximately 50 years of age, two were 60 years of age and one was 70 years of age.

Alma Media's Group Executive Team consisted of 10 members during the year under review, three (30%) of whom were women. 20 per cent the members of the Group Executive Team were aged 50 or younger, and 80 per cent were over 50. Women accounted for 40 per cent of supervisors in the Group as a whole and 48 per cent of supervisors in Finland.

Table 8: Alma Media's employees	Employees	Women as managers, %	Men as managers, %
Finland	975	48	52
Czech Republic	353	24	76
Baltic countries: Estonia, Latvia, Lithuania	74	47	53
Slovakia	106	44	56
Croatia	90	33	67
Bosnia	38	50	50
Sweden	15	0	100
Other	34	-	-
<b>Total</b>	<b>1,690</b>		

Table 9: Employee 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	31%	64%	5%	1%	99%	96%	4%	100%
Bosnia and Herzegovina	18%	82%	0%	32%	68%	100%	0%	100%
Croatia	19%	78%	3%	0%	100%	89%	11%	100%
Other operating countries	27%	73%	0%	18%	82%	100%	0%	100%
Sweden	20%	73%	7%	7%	93%	87%	13%	100%
Slovakia	23%	75%	2%	2%	98%	96%	4%	100%
Finland	17%	64%	19%	7%	93%	90%	10%	100%
Czech Republic	14%	83%	2%	11%	89%	89%	11%	100%

A more detailed distribution of employees is provided in Table 8.

In all of Alma Media's country units, at least nine out of ten employees were in a permanent employment relationship in the year under review. In Bosnia-Herzegovina, seven out of ten employees were in a permanent employment relationship.

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. We increased the use of digital learning environments during the year.

We made extensive use of digital learning environments, such as Howspace and Seduo, which made it possible to develop competence in a multi-location work environment. Digital capabilities were developed in the digital marketing training package, among others. Theme-specific training related to self-management and the development of managerial work in a multi-local work environment were also key areas of HR development in 2021.

With regard to the development of an equal and diverse work community, the Group placed attention during the year under review on the transparency of recruitment, and in Alma's Baltic operating countries, for example, CV Online is seeking to promote equality and diversity concretely in its customer companies by not allowing employers to use age and gender data as employee search criteria in its CV database.

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 2021, 625 Alma employees had participated in these workshops. While observing the restrictions caused by the COVID-19 pandemic, we implemented principles concerning multi-local work in 2021. The principles make it easier for employees to perform their work in different life stages while increasing the productivity and well-being of work as well as flexibility with regard to the reconciliation of individual life circumstances and work.

As part of the new Code of Conduct package, the Group's principles and operating models to prevent harassment and bullying were implemented in all of Alma's operating countries.

**FOCUS AREAS FOR THE DEVELOPMENT OF SUSTAINABILITY IN 2022**

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 2022, the Group will conduct an employee survey concerning the

realisation of equality, diversity and inclusion in the Group. The survey will be used to identify any areas for development, and the necessary development plans will be prepared based on the observations.

The significance of diversity will be emphasised in communications to supervisors and in supervisor and work community development training in 2022. We are also planning an online course for all the employees covering the themes of diversity and inclusion.

# Future-fit workforce

## DEVELOPING EMPLOYEE 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-to-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 com-

petence development. Alma Media's employees have primarily worked using a multi-local work model during the COVID-19 pandemic. Supervisors have received training related to managing remote and multi-local work. In spite of the exceptional circumstances and the extensive transition to remote work, there were no interruptions in Alma Media's services during the year and service quality was successfully maintained.

As the COVID-19 pandemic continued, the special working group of representatives of all the operations which started its work in Finland in 2020 continued its work. The working group is responsible for monitoring the COVID-19 status and instructions of the authorities regularly and for preparing the guidelines and instructions for employees based on them. Employee well-being was supported in various ways during the exceptional circumstances created by the pandemic. Webinars on mental well-being and coping during COVID-19 and on the ergonomics of remote work were organised in cooperation with the occupational health care provider. An "Alma employee's well-being package" also supports the employees, consisting of tips for well-being in daily life: ergonomics, recovery, sleep, psychological well-being, human interaction, occupational health care and the Auntie service. Auntie is a low-threshold psychological well-being service offered to Alma Media employees. It is aimed at reducing stress, improving employees' ability to cope, increasing efficiency and providing concrete tools for managing one's daily life. A

series of well-being lectures by Auntie were also available to all employees. Virtual exercise breaks were organised regularly to help employees maintain a healthy and productive rhythm during remote work.

## ACHIEVEMENT OF SUSTAINABILITY TARGETS IN 2021

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 82 per cent. This target was exceeded in the year under review, with the score being 85.4 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 8.1 (eNPS 32). 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. Alma Media achieved the target set for the retention of new employees in 2021. Of the employees who joined the company two years ago as new employees, more than 90 per cent remained with the Group during the year under review.

The voluntary departure turnover of Alma Media's employees in the Group's operating countries was 7.6 per cent on average.

## OTHER DEVELOPMENT PROJECTS DURING THE YEAR

In spite of the continued exceptional circumstances caused by the COVID-19 pandemic, the development of employee competence and related training activities continued as planned in 2021. Training was largely implemented using virtual tools due to the pandemic. In the development of employee competence and well-being, the focus in 2021 was on managerial work, continuous learning and the sharing of expertise. A supervisor mentoring programme across national and business unit boundaries was introduced. A joint Growth Day event for all of Alma Media's countries of operation was organised in the autumn for employees to share their knowledge and expertise with each other in various ways. Alma Talent continued the extensive managerial training programme called "Management Growth Path" started in 2020 to support supervisors' capabilities in a digital and multi-local work environment. In 2021, a similar managerial training programme was launched in Alma Media Solutions. Alma Media Solutions' Alma Academy also continued its work in 2021 with the themes of growth, excitement and creativity as well as interaction and efficient communication.

Alma employees in Finland utilised the Alma Talent Seduo online learning environment. The digital training service, which has been local-



used 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. Support material on dealing with online bullying was prepared for the employees to help them with situations involving online bullying or hate speech and to improve their capacity to resolve such situations.

In 2021, we organised two trainee programmes for recent graduates in technology and marketing. These programmes allowed us to

increase competences important for Alma's business and gave employment to 23 young people starting their careers.

**FOCUS AREAS FOR THE DEVELOPMENT OF SUSTAINABILITY IN 2022**

In 2022, 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 learning materials and launch a competence development support system to give employees even more equal opportunities to improve their competence regardless of

where they are based. Solutions such as Alma Talent's Seduo online learning environment are used in competence development.

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 and multi-local work environment. Training activities will continue to be implemented under the Growth Day, Digital Sales Academy and Alma Academy concepts as well as by promoting a culture of sharing expertise and the growth of the Alma Mentor community. We will improve

the digital literacy of Alma employees as well as their understanding of the utilisation of data in the Data Challenge online training.

So far, we have been able to implement the operating model for multi-location work introduced in Alma Media in 2021 to a lesser degree than planned due to the COVID-19 restrictions. Managers and teams will be supported further in the deployment of the model 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 2021	Progress made in 2021	Definition 2022
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 13.8% in 2021. We arranged training programmes that support the development of employee competence and invested in the collaborative learning of employees and knowledge sharing by organising mentoring programmes, competence workshops and theme events, amongst other things.	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.
<b>Strategic intent:</b>		<b>Strategic intent:</b>
The most competent, committed and well-being employees in the industry.		The most competent, committed and well-being employees in the industry.
<b>Objectives for 2021:</b>		<b>Objectives for 2022:</b>
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.	Training, competence workshops, mentoring programmes and theme events supporting the development of managerial work, continuous learning and sharing of competence.	Continuous professional development, sharing of competence and self-development.
High quality of working life, QWL >82.	High quality of working life, QWL = 85.	High quality of working life, QWL >83.
Supporting the mental and physical energy levels of employees.	Webinars on mental well-being and coping as well as on the ergonomics of remote work in cooperation with the occupational health care provider. Operating model of multi-location work to increase flexibility in work in different life situations.	Well-being training in cooperation with the occupational health care provider. The development and implementation of the operating model of multi-location work continues in 2022.
New employee retention 90%.	Retention rate of over 90% regarding employees who have worked for us for over 2 years. The average employee turnover in the Group was 7.6%.	Employee turnover of new employees under 10%.
Likelihood of recommending the Group as an employer 8 (1-10).	Likelihood of recommending 8.1 (1-10).	Likelihood of recommending the Group as an employer 8 (1-10).

RESPONSIBLE  
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 our 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 in 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 of the readership of individual news articles 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.

## ACHIEVEMENT OF SUSTAINABILITY TARGETS IN 2021

The most relevant sustainability target for media is the number of condemnatory decisions by the Council for Mass Media. Our goal is that the Group's media brands' combined share of the condemnatory

decisions issued by the Council should be under 20 per cent of the total condemnatory decisions issued in any given year. The large readership of Alma Media's media outlets in Finland was taken into consideration in setting the target.

During the year, none of Alma Media's media were issued a condemnatory decision by the Council for Mass Media, meaning that the annual target measuring responsible journalism was exceeded by a clear margin. In 2021, the Council for Mass Media issued 60 decisions based on complaints, with 24 of these decisions being condemnatory. Alma Media has specified key indicators measuring the development of responsible media. Our goal is that no more than five condemnatory decisions are issued to Alma Media's media by the Council for Mass Media annually. Alma's media also have an annual development goal in the future. The financial and professional media seek to verify the effectiveness of the media in terms of improving citizen and company awareness of solutions promoting sustainable development. In 2022, editors will be trained and any stories presenting solutions for sustainable development for individuals or companies will be tagged with a shared keyword. The number of such stories published and the development of reach will be reported in the future. Iltalehti will also arrange a specific training aimed at strengthening the journalistic competence related to sustainable development for its reporters in 2022.

## OTHER DEVELOPMENT PROJECTS DURING THE YEAR

The COVID-19 pandemic that started in spring 2020 continued to increase the demand for up-to-date and reliable information in 2021. Iltalehti grew into the biggest digital news media in Finland, passing Hs.fi and Is.fi in terms of readership based on the national FIAM measurement. The readership of content related to sustainability increased, and people were interested in the extensive societal topics and fact-based surveys of the media, which helped Iltalehti to grow into the biggest in Finland. Iltalehti started its own investigative journalism programme aimed at developing the journalistic ability of the media to ensure the lawfulness of decision-making in society and of the actions of the authorities and decision-makers. Financial and professional media published multiple articles addressing topics such as the EU's climate targets, emission reductions, the shift of financing towards responsible investment and climate innovation.

The Group's media did not receive any assistance from governments or non-governmental sources or political funding in the year under review. 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 its 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 databases.

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. Furthermore, it is prohibited to target content and advertising to young people under the age of 18 in Alma Media's media.

### 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-quality 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. 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 privacy 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 privacy ensures the compliance of the management and utilisation of user data and the user consent management tool.

### ACHIEVEMENT OF SUSTAINABILITY TARGETS IN 2021

The Group does not publish advertising that is in violation of good advertising practices and has set a target for responsible marketing, according to which its online and mobile services should not feature any advertisements that violate the guidelines of good marketing practices published by the International Chamber of Commerce. During the year under review, 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.

### FOCUS AREAS FOR THE DEVELOPMENT OF SUSTAINABILITY IN 2022

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 2022, resources will be particularly allocated to promoting responsible media and marketing and brand safety, ensuring a high-quality and brand-safe media environment for advertisers and providing high-quality targeting data for advertisers. The Group also seeks to develop new advertising and content marketing solutions based on sustainability to emphasise the significance of the sustainability work of companies. 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 2021	Progress made in 2021	Definition 2022
<p>Readers' trust is a precondition for journalistic media. We are committed to truthful, open and pluralistic journalism and responsible marketing.</p>		<p>Readers' trust is a precondition for journalistic media. We are committed to truthful, open and pluralistic journalism and responsible marketing.</p>
<p><b>Strategic intent:</b></p>		<p><b>Strategic intent:</b></p>
<p>A defender of the freedom of speech, democracy and pluralist communications.</p>		<p>A defender of the freedom of speech, democracy and pluralist communications.</p>
<p><b>Objectives for 2021:</b></p>		<p><b>Objectives for 2022:</b></p>
<p>Under 20% of all the condemnatory decisions issued by the Council for Mass Media apply to Alma Media's media.</p>	<p>The Council for Mass Media did not issue a single condemnatory decision to Alma Media's media in 2021. All in all, the Council for Mass Media processed 60 reprimands during the year, 24 of which were condemnatory to media.</p>	<p>No more than five (5) condemnatory decisions are issued to Alma Media's media by the Council for Mass Media annually.</p>
<p>Specifying the indicators for responsible journalism.</p>	<p>In 2021, Alma Media's media specified the following indicators for sustainable journalism: 1) Financial and professional media will monitor the number of articles providing solutions for sustainable development. 2) Sustainable journalism training is organised for reporters.</p>	<p>Implementation of keywords based on sustainable development and a responsible journalism training for reporters.</p>
<p>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.</p>	<p>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.</p>	<p>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.</p>

# Responsible services

The expectations of our key stakeholders – our employees, customers, readers and users as well as investors – regarding the sustainability of our operations reflect our opportunities to make a difference in the mitigation of climate change, sustainable business operations as well as the promotion of competence development and equality between individuals. The results of the materiality analysis describe how the scope of Alma Media's operations enable the promotion of sustainable development in many ways in companies, in the lives of people and in society.

The aspects identified by the stakeholders as being linked to our digital business and strong brands are especially interesting. Digital services enable impacting climate change and promoting sustainable choices in housing or vehicle traffic. Our training services allow us to develop professional competences in companies and promote sustainable business operations.

## CUSTOMER SATISFACTION

Our business is based on responding to the needs of our customers and the users of our services. Our product and services must be of high quality and safe to use. Alma's business operations have transitioned more and more towards paying for the media and service content, which emphasises the significance of customer satisfaction even further. Customer satisfaction creates value into the business and moves the focus from the reaching

of customers and individual transactions to creating stakeholder commitment and long-term value creation. 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 digital business, 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 on the functionality of the service and the data security of use are significant psychological factors affecting customer satisfaction.

The use of the Alma ID expanded in 2021 to include almost all of Alma Media's media and digital services in Finland. By the end of the year, the number of registered Alma ID users was as high as 900,000. The functionalities of the self-service account will be developed further in 2022. With this account, users can see for which purposes the data collected with their consent is used, and they can also view their own user profiles based on this data. In the future, it will be possible to modify the

user profile through the self-service account. By developing the Alma ID, we increase understanding about customer expectations and develop our services based on the users.

## 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 2021, the annual NPS average in Alma Media's services varied from 19.7 (Vuokraovi.com) to 40.8 (Etuovi.com). Autotalli.com, for example, had an NPS score between these values (average 24.2). Only some of Alma Media's services regularly measure customer satisfaction. Monitoring of customer satisfaction will be developed in 2022 through the harmonisation of the measurement methods used in services and the measurement frequencies.

## ETHICAL SERVICE DESIGN

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. While the directive is not directly binding to Alma Media's services, we have already started assessing the impact of the directive's contents on service development and will continue this work in 2022.

## GREEN SERVICE DESIGN

Alma Media's automobile and housing services attract 300,000–1,000,000 users per month. Our services enable sustainable choices for the users by offering environmental selection criteria. In our Etuovi.com service, the user can restrict the available choices based on the source of heat used in the apartment. For example, the service offers almost 3,000 apartments with geothermal heating as the source of heat. 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. At the beginning of 2022, Nettiauto already offers approximately 2,500 options using electricity or gas as the source of energy, and Autotalli.com service includes almost 2,000 electric or gas vehicles. 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.

Alma Media's Nettivuokraus and Nettimarkkina services operate in the circular economy market and give the users the opportunity to restrict consumption, save the environment and favour private renting instead of buying new consumer goods, such as equipment, machines, cars and tools.

### SUSTAINABLE CITIES AND COMMUNITIES

The sustainability area "sustainable cities and communities" identified in Alma Media's materiality analysis brings the Group new opportunities to affect sustainable development. Clarifying the significance of this in business and the planning of actions will start in 2022. We find that the principle of materiality is met clearly since Etuovi.com and Vuokraovi.com, our marketplaces for the sales, buying and renting of homes, the new digital property transaction service DIAS, the bidding service Urakkamaailma focusing on renovations and repairs as well as the moving service Muuttomaailma already create

an impressive package of services related to housing in Finland. We have significant opportunities to impact the sustainable development of the housing market through cooperation between the various services and by engaging company partners. For us, sustainable living in cities means reducing the climate impacts of housing, for example. Increased digital services, digital services supporting everyday living and the efficient utilisation of location services reduce unnecessary driving and movement. 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. As the services of the circular economy evolve, goods and services find new owners efficiently in local communities and thereby reduce the carbon footprint of housing as well as unnecessary consumption and storage.

### COOPERATION AND PARTNERSHIPS

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. 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 improving the mental well-being of young people and preparing them for the working life. In the

next contract period, the cooperation will focus on introducing the working life to young people, the national TET project (Getting to know working life) aimed at building a bridge between employers and young people going to lower or upper secondary school.

### SUSTAINABLE DEVELOPMENT PROJECTS IN 2021

In Finland, the most significant sustainable development partnerships in recent years have been related to the development of a better working life. Our working life reporters at Kauppalehti, Fakta and Talouselämä, our book and training business focusing on the development of professionals and our significant position as a recruitment service provider in Finland and internationally create a strong basis for this. The Onni työssä (Happiness at work) project launched several years ago aims at changing the way Finnish employees experience the working life and well-being at work as well as in the identification of opportunities created by the transformation of work enhanced by digitalisation. We have created content articles and video interviews in cooperation with companies such as Elisa, K Group and Aalto University to increase transparency to companies and good company practices that have improved the well-being, enthusiasm and commitment of employees.

The project has also produced concrete tools to strengthen employee well-being, job satisfaction and motivation in an eight-part virtual online training open for all Finns free of charge. The interactive sections of the course focus on the identification of one's strengths, energy levels at work, learning working life

skills for the future and thereby improving one's motivation. The job search service Monster also implemented an online course package on how to find work to facilitate employment. Together with Monster's course on how to find work, the Onni työssä course reached a total of 18,000 users. With an average of 4.6 (on a scale of 1-5), the participants of the Onni työssä gave excellent feedback. The Onni työssä course aimed at professionals was followed up in cooperation with Monster and the Finnish Children and Youth Foundation when we implemented a course package for young people both in Finnish and in Swedish in autumn 2021. The online course aimed at young people specifically focuses on supporting the strengths of young people in finding work, taking care of one's own energy levels and strengthening future working life abilities. Young people needing special support are also observed. The video course materials were distributed widely to thousands of school contact persons for use as a supplement of teaching materials related to getting to know the working life.

In addition to the Onni työssä project led by Alma Media's Corporate Communications function, Alma Media's recruitment services have several projects aimed at improving people's working life competencies in Eastern Central Europe.

In Bosnia and Herzegovina, for example, Alma Media's Kolektiv conducted a youth employment project funded by the Swiss government. In 2021, eight academies were conducted in partnership companies, providing training positions for 280

unemployed young people. In addition, Kolektiv executed a project in cooperation with World Bank, offering employment and advice services free of charge to the long-term unemployed and people who had lost their job due to the COVID-19 pandemic. In the year under review, advice services were offered to 1,950 unemployed people and employment services to 1,250 in this project. The project helped 600 unemployed people find a job. By the end of the year, 300 of these people had been employed for at least three months.

Furthermore, Kolektiv conducted the Most attractive employer survey in cooperation with Sarajevo Open Center and awarded the best employers.

In 2021, "The Most Inclusive Employer" was also awarded in the survey. This award was awarded in cooperation with the Sarajevo Open Center institution promoting human rights and the position of women and sexual minorities. The award was given to the company that was the most successful one to provide equal opportunities for all its employees. All in all, 10,700 people participated in the survey, nominating 500 companies in total.

In Slovakia, Profesia was awarded the national price for its work for the promotion of employment of people with reduced work ability as the first private sector company in 2021. The award was given for

the comprehensive guidebooks prepared for people with reduced work ability about matters related to the working life. Another guidebook was prepared for employers with practical instructions and advice on the employment of people with reduced work ability. The European Career Guidance Award is issued by The European Euroguidance Network. The jury found Profesia's project more efficient than the government's employment services.

Profesia has a long-term sustainability goal to increase the competence of teaching staff in human resource management and recruitment. The Help with Heart project related to this goal has been running since 2019 already. Profesia maintains the digital Edujobs.sk service through which schools can recruit employees free of charge and the managers of schools can participate in the Academy of Directors training programme to improve their managerial skills. In 2020–2021, 21 academic managers graduated from the programme.

In the Czech Republic, Alma Media's leading recruitment company LMC is already in the third year of its cooperation with the Czechitas association, whose mission is to increase diversity in the IT industry and encourage girls and women to pursue careers in the industry. The coding courses given by the association in previous years were ended last year due to the COVID-19 pandemic, but LMC helped the association to focus its

projects and courses to the correct target groups by giving the association access to its labour market data. In 2021, LMC also continued its programme under which it offers its recruitment services to NGOs and non-profits in exchange for a nominal fee of one euro. Almost 700 NGOs and non-profits participated in the programme. In the year under review, the actual value of the services amounted to approximately MEUR 7.3, and almost 7,000 jobs were opened in the programme. LMC has also offered NGOs and non-profits access to its other services – such as the Seduo.cz online training service and the Arnold survey tool – for a nominal fee. In addition to supporting NGOs and non-profits, LMC helped the residents of the Moravia province who suffered tornado damage in summer 2021. LMC's employees raised almost 5,000 euros of their own funds for people living in Moravian villages.

MojPosao, Alma Media's leading recruitment service provider in Croatia, promotes the development of the working life by its annual employee satisfaction survey aimed at companies. Companies volunteer to participate in the survey that was launched in 2007, and the employees of the participating companies evaluate their employer. The winners of the survey are awarded Best employee awards each year.

MojPosao also awards The Best HR Practice Award for the best HR practices to highlight companies and organisations as well as teams

and individuals who excel in HR management and thereby improve the quality of the working life of their employees and the results of work. The award has been given since 2010 under the name of the MojPosao site. In the year under review, MojPosao organised a campaign on the International Women's Day to increase awareness of the unequal treatment of women in the labour market with regard to unequal pay and discrimination. In the year under review, the Women's Day campaign was executed in the form of job advertisement where the job title was given in the feminine form. The campaign was supported by the Ombudsperson for Gender Equality in Croatia.

## FOCUS AREAS FOR THE DEVELOPMENT IN 2022

In 2021, Alma Media aims to further increase the impact of its cooperation with companies and its social projects to promote sustainable development. The resources will be focused on the Group's sustainability strategy and on the key themes in terms of the opportunities for impact resulting from the Group's business identified based on the recent materiality analysis. The materiality areas related strongly to the Group's service operations and brands as well as the related development goals will be specified in more detail in 2022, and a progress plan and indicators describing the progress will be set for each area.



# Objectives of Alma Media’s sustainability programme for 2022

Alma Media updated its sustainability programme based on a comprehensive materiality analysis in 2021. Objectives were set for the sustainability, and key indicators were specified.

## ENVIRONMENT

- Minimising CO2 emissions

### OBJECTIVE FOR 2030

Reduction of greenhouse gas emissions from own operations by 46% and those arising from the subcontracting chain by 14%

### OBJECTIVE FOR 2022

Annual reduction of greenhouse gas emissions from own operations by 4.3% and those arising from the subcontracting chain by 1.2%

## GOOD GOVERNANCE

- Preventing corruption, bribery and human rights violations in the business operations.
- Ensuring the data security of using the leading services in the market and preventing serious data security breaches

### OBJECTIVE FOR 2022

100% of Alma Media employees have taken the Code of Conduct course

### OBJECTIVE FOR 2022

50% of key subcontractors have committed themselves to observing the Group’s Code of Conduct

### CONTINUOUS OBJECTIVE

There were no serious data security breaches in the Group’s services.

## SOCIAL RESPONSIBILITY

- Responsible media, journalism and marketing
- Commitment of employees and ensuring a high quality of working life

### OBJECTIVE FOR 2022

Condemnatory decisions issued to media by the Council for Mass Media < 5

### OBJECTIVE FOR 2022

The Group does not publish any advertisements that violate the guidelines of good marketing practices published by the International Chamber of Commerce

### OBJECTIVE FOR 2022

8/10 of Alma Media’s employees would recommend their employer

### OBJECTIVE FOR 2022

Quality of Working Life index (QWL) over 83%

## FINANCIAL OBJECTIVE

- Profitable business growth

### OBJECTIVE

Long-term targets published by the Group (see almamedia.fi)

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 10: Information in accordance with TCFD		
<b>Strategy</b>	The impacts of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning	Financial risks are assessed as a part of the annual Group-level risk assessment process. The thresholds apply to all the risks in the Group's business segment and operations. The financial or strategic impacts of the risks are classified as: <ul style="list-style-type: none"> <li>substantial if the probabilities of the realisation of the risk within 6 months is high and if the net loss is over 10 million euros (high risk)</li> <li>significant if the net loss is 5–10 million euros (medium risk)</li> <li>minor if the net loss is 1–5 million euros (small risk).</li> </ul>
<b>Strategy</b>	Climate-related risks and opportunities on the short, medium and long term	In the short term, warmer winters will complicate the harvesting of wood by the paper suppliers that operate as Alma's subcontractors, which may lead to higher paper prices. Increasingly strict national and EU-level climate regulations may also have cost impacts in Alma Media's subcontracting chain. Changes involving paper and delivery costs have an effect on the costs of print publications, for example. In the longer term, increasing extreme weather phenomena caused by climate change are predicted to increase the risk of technical disruptions to digital services in Alma Media's various operating countries. The Group manages its environmental risks by systematically developing its operations in accordance with the Group's science-based climate targets (SBTs) and by engaging in active environmental dialogue with its key suppliers.
<b>Risk management</b>	Links of the climate risk identification, assessment and management to other risk management within the organisation	Financial risks are assessed as a part of the annual Group-level risk assessment process. With regard to climate risks, the Group has identified the risks of, for example, extreme weather conditions, increased regulation, emission trade pricing and the pricing mechanism as well as changes in customer behaviour related to climate change. The Group has also identified the impacts of these risks on the operational costs, including the price of insurance.
<b>Risk management</b>	The processes used by to identify and assess climate-related risks	Climate-related risks are identified and assessed as a part of the annual Group-level risk assessment process. This covers the Group's marketing and operating environment, operational and business aspects as well as the current and future framework of regulation and reputational risks.
<b>Metrics and targets</b>	Scope 1, Scope 2 and Scope 3 emissions and the risks related to them	Content in Alma Media's Annual Review by the Board of Directors: Statement of non-financial information/Environmental responsibility p. 6, 23–24, and p. 142–143, 152–157 of the Sustainability report
<b>Metrics and targets</b>	The targets and results used to manage relevant climate-related risks and opportunities	Content in Alma Media's Annual Review by the Board of Directors: Statement of non-financial information/Environmental responsibility p. 28–29, and p. 154 of the Sustainability report

### CALCULATION AND DATA COLLECTION PRINCIPLES FOR CR REPORTING

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 pages 174–179. The 2021 report has not been subject to independent assurance.

# GRI index

GRI Indicator	Location	More information
<b>Organisation</b>		
102-1	Name of the organisation	Alma Media
102-2	Activities, brands, products and services	Report by the Board of Directors p. 7, 17–19, 21
102-3	Location of headquarters	<a href="http://www.almamedia.fi/yhteystiedot">www.almamedia.fi/yhteystiedot</a>
102-4	Location of operations	Finland, Czech Republic, Slovakia, Estonia, Latvia, Lithuania, Croatia, Bosnia and Herzegovina, Sweden, Poland, Slovenia
102-5	Ownership and legal form	Report by the Board of Directors p. 35
102-6	Markets served	Financial statements p. 96
102-7	Scale of the organisation	Report by the Board of Directors p. 28, Sustainability report p. 161
102-8	Information on employees and other workers	p. 161
102-9	Supply chain	p. 156–157
102-10	Significant changes to the organisation and its supply chain	Financial statements p. 46, Report by the Board of Directors p. 14, 16
102-11	Precautionary Principle or approach	p. 13–15, 16–17
102-12	Externally-developed initiatives to which the organisation subscribes, or which it endorses	p. 147, 149
102-13	Memberships of associations and advocacy organisations	p. 147, 149
<b>Strategy</b>		
102-14	CEO's review	p. 142, Report by the Board of Directors p. 3–4
102-15	Key impacts, risks, and opportunities	Report by the Board of Directors p. 21–30
<b>Ethics and integrity</b>		
102-16	Values, principles, standards, and norms of behavior	Report by the Board of Directors p. 19
102-17	Mechanisms for advice and concerns about ethics	p. 150, 160
<b>Governance</b>		
102-18	Governance structure	p. 149, Corporate Governance Statement p. 115
102-19	Delegating authority	p. 149, Corporate Governance Statement p. 119–120
102-20	Executive-level responsibility	p. 149
102-21	Consulting stakeholders	p. 145–146, 149
102-22	Composition of the Board of Directors	Corporate Governance Statement 115–119
102-23	Chair of the Board of Directors	Corporate Governance Statement 115–119
102-24	Nominating and selecting the Board of Directors	Corporate Governance Statement 115–120

GRI Indicator		Location	More information
102-25	Process in place for the Board to ensure conflicts of interest are avoided	p. 157, Financial statements p. 87, Corporate Governance Statement p. 127, Sustainability report p. 151	
102-26	Role of the Board of Directors in setting purpose, values and strategy	Corporate Governance Statement 115–120	
102-27	Collective knowledge of the Board of Directors	Corporate Governance Statement 115–120	
102-28	Evaluating the Board of Directors' performance	Corporate Governance Statement 115–120	
102-29	The Board of Directors' role in identifying and managing impacts and risks	p. 149, Corporate Governance Statement p. 113–114	
102-30	Effectiveness of risk management processes	Corporate Governance Statement p. 128–129	
102-31	Frequency of the Board of Directors' reviews of risks	Report by the Board of Directors p. 28–29	
102-32	The Board of Directors' role in sustainability reporting	p. 149	
102-33	Communicating critical concerns	Report by the Board of Directors p. 22	
102-34	Nature and total number of critical concerns	Report by the Board of Directors p. 22	
102-35	Remuneration of the Board and senior executives	Remuneration report p. 134–139	
102-36	Process for determining remuneration	Remuneration report p. 134–139	
102-40	List of stakeholder groups engaged by the organisation	p. 146	
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, 62% of employees were covered by collective agreements at the end of 2020. In 2020, Alma Media sold its regional news media business and printing operations, and the number of organised employees is reported while taking this divestment into consideration. All Alma Media's employees in Sweden were covered by collective agreements in 2020. The divestment of the media business in Sweden has been taken into account in the reported number.
<b>Stakeholder interaction</b>			
102-42	Basis for identification and selection of stakeholders with whom to engage	p. 145	
102-43	Approach to stakeholder engagement	p. 146	
102-44	Key topics and concerns raised through stakeholder engagement	p. 146	
<b>Reporting practice</b>			
102-45	Entities included in the consolidated financial statements	p. 141	
102-46	Defining the report content	p. 145, 173	
102-47	Material topics and their calculation boundaries	p. 145, 173	
102-48	Restatements of information	p. 173	
102-49	Significant changes in the scope and topic boundaries	p. 173	
102-50	Reporting period	1 January–31 December 2020	
102-51	Date of most recent report	2 April 2020	

GRI Indicator		Location	More information
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	comms@almamedia.fi	
102-54	Claims of reporting in accordance with the GRI Standards	p. 173	
102-55	GRI content index	p. 174	
102-56	External assurance	p. 173	
<b>Management approach</b>			
103-1	Material topics and their Boundaries	p. 142	
103-2	The management approach and its components	p. 149	
103-3	Evaluation of the management approach	p. 149	
<b>Economic standards</b>			
<b>Economic performance</b>			
201-1	Direct economic value generated and distributed	Report by the Board of Directors p. 21	
201-4	Financial assistance received from government	p. 166	
<b>Anti-corruption</b>			
205-1	Operations assessed for risks related to corruption	Code of Conduct training, p. 11–12	
205-2	Communication and training about anti-corruption policies and procedures	Code of Conduct training, p. 11–12	
205-3	Confirmed incidents of corruption and the actions taken	p. 151	
<b>Anti-competitive behaviour</b>			
206-1	Legal actions for anti-competitive behavior, anti-trust and monopoly practices	p. 151	
<b>Environmental standards</b>			
<b>Energy</b>			
302-1	Energy consumption within the organisation	p. 153	
302-2	Energy consumption outside of the organisation	p. 153	
<b>Emissions</b>			
305-1	Direct (Scope 1) GHG emissions	p. 153	
305-2	Energy indirect (Scope 2) GHG emissions	p. 153	
305-3	Other indirect (Scope 3) GHG emissions	p. 153, 156	
305-4	GHG emissions intensity	p. 153	
305-5	Reduction of GHG emissions	p. 153, 156	
307-1	Non-compliance with the environmental laws and regulations	p. 153	
308-1	New suppliers were screened using environmental criteria	p. 156	
308-2	Negative environmental impacts in the supply chain and actions taken	p. 156–157	

GRI Indicator		Location	More information
<b>Social standards</b>			
<b>Employee turnover</b>			
401-1	New employee hires and employee turnover	p. 163–164	
<b>Training and education</b>			
404-1	Average hours of training per year per employee 404-1		
404-2	Programs for upgrading employee skills and transition assistance programs	p. 163–164	
404-3	Percentage of employees receiving regular performance and career development reviews	p. 163	
<b>Diversity and equal opportunity</b>			
405-1	Diversity of governance bodies and employees	p. 160–161	
405-2	Ratio of basic salary and remuneration of women to men		
<b>Non-discrimination</b>			
406-1	Incidents of discrimination and corrective actions taken	p. 160	
414-1	New suppliers that were screened using social criteria	p. 160	
414-2	Negative social impacts in the supply chain and actions taken	p. 156–157	
<b>Public policy</b>			
415-1	Political contributions	p. 166	
<b>Marketing and labelling</b>			
417-3	Incidents of non-compliance with regulations and/or voluntary codes concerning marketing communications	p. 167–168	
<b>Customer privacy</b>			
418-1	Total number of substantiated complaints received concerning breaches of customer privacy and losses of customer data	p. 158	
<b>Compliance</b>			
419-1	Non-compliance with the laws and regulations in the social and economic area	p. 151	
<b>Content in accordance with GRI G4</b>			
<b>Standards applicable to the media sector</b>			
G4-M1	Significant funding and other support received from non-governmental sources	p. 166	
G4-M2	Methodology for assessing and monitoring adherence to content creation values	p. 166	
G4-M3	Actions taken to improve adherence to content creation values	p. 166	
G4-M4	Content accessibility, protection of vulnerable audiences and informed decision-making	p. 166	
G4-M7	Actions taken to empower audiences through media literacy skills development	p. 170	

# Global Compact content index

Principle	Location
<b>Human rights</b>	
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.	Code of Conduct, Sustainability Report p. 150–151, 160–161
Principle 2: Businesses should make sure that they are not complicit in human rights abuses.	Code of Conduct, Sustainability Report p. 150–151, 160–161
<b>Careers</b>	
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	Code of Conduct, Sustainability Report p. 175
Principle 4: Businesses should support the elimination of all forms of forced and compulsory labour.	Code of Conduct, Sustainability Report p. 150–151, 160–161
Principle 5: Businesses should support the effective abolition of child labour.	Code of Conduct, Sustainability Report p. 150–151, 160–161
Principle 6: Businesses should support the elimination of discrimination in respect of employment and occupation.	Code of Conduct, Sustainability Report p. 150–151, 160–161
<b>Environment</b>	
Principle 7: Businesses should support a precautionary approach to environmental challenges.	Sustainability Report p. 152–154, 156–157
Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.	Sustainability Report p. 152–154, 156–157
Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.	Code of Conduct, Sustainability Report p. 152
<b>Anti-corruption</b>	
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	Code of Conduct, Sustainability Report p. 150, 160

# 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 behavior regulations	p. 151	
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	p. 166	
SV-ME-520a.1	Description of approach to ensuring intellectual property (IP) protection	p. 157	
SV-ME-270a.1	Total amount of monetary losses as a result of legal proceedings associated with libel or slander	p. 151	
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	p. 157	
SV-ED-230A.2	Description of policies and practices relating to collection, usage and retention of student information	p. 157	
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	p. 157	
CG-EC-220A.1 TC-IM-220A.1	Number of users whose information is used for secondary purposes	p. 157	
CG-EC-220A.2 TC-IM-220A.1	Description of policies and practices relating to behavioral advertising and user privacy	p. 157	
TC-IM-220A.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	p. 151	
SV-ME-260A.2	Description of policies and procedures to ensuring pluralism in news media content	p. 166	
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	p. 160 p. 160–161	
TC-IM-330A.1	Percentage of employees that are foreign nationals	p. 161	
TC-IM-330A.2	Employee engagement as a percentage, 5	p. 164	
TC-IM-130A.3	Discussion of the integration of environmental considerations into strategic planning for data center need	p. 152	
NASDAQ ESG		Location	
G6.1	Does your company follow an Ethics and/or Anti-Corruption policy?	p. 150	
G6.2	If yes, what percentage of your workforce has formally certified its compliance with the policy?	p. 150	





**Alma Media Corporation**

Alvar Aallon katu 3 C, FI-00100 Helsinki, Postal address: P.O. Box 140, FI-00101 Helsinki  
Tel. +358 (0)10 665 000, [firstname.lastname@almamedia.fi](mailto:firstname.lastname@almamedia.fi), [almamedia@almamedia.fi](mailto:almamedia@almamedia.fi)