

CODE OF BUSINESS ETHICS

nordic
morning

CODE OF BUSINESS ETHICS

Nordic Morning's Code of Business Ethics is based on our values of renewal, respect and responsibility. It helps us conduct successful business operations and feel good at work.

All of us working within Nordic Morning follow these ethical rules in our interaction with colleagues, customers, partners and other stakeholders. We also expect our partners to comply with the Code of Business Ethics.

The Nordic Morning Group comprises the brands Klikki, Ottoboni, Sitrus, Edita, Seed Digital Media and Mods. The Group's home markets are Finland and Sweden. Parent company Nordic Morning Plc is located in Helsinki. For further information, please visit www.nordicmorning.com

OUR VALUES

Renewal – we are innovative forerunners.

Respect – we are honest, trustworthy and dedicated to equality.

Responsibility – we operate our business in a transparent, ethical and sustainable way.

ENJOY THE CHANGE

We are 700 passionate professionals driving marketing, communication and business change. We help our customers to transform their business to thrive in the digital world.

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PEOPLE

We believe that individuals with diverse backgrounds and experience, working in an environment built on trust and transparency, are essential to our success.

We are committed to building a culture of engagement, providing employees with learning opportunities, talent nurturing, caring leadership and rewarding for achievements. We encourage employees to collaborate with each other across the group to strengthen our culture and ability to serve customers.

We are an equal-opportunities employer. Everyone should feel welcome to work with us, regardless of gender, age, race, cultural background, religious beliefs or sexual orientation. We are committed to providing a workplace that is safe and conducive to good health, free from bullying, harassment and favoritism.

We strive for a culture that enables good flow at work and respects individual needs for recovery, enhancing balance between work and personal time.



THE COMPANY

Nordic Morning's brands are a valuable asset that we can protect and strengthen by acting with integrity and professionalism.

A key area of our Code of Business Ethics concerns identifying and preventing conflicts of interest. These can arise in interactions involving employer, employees, clients and partners. In this context, it is crucial that we act with the company's interests in mind, as opposed to our personal interests. Whenever personal interests have the potential to compromise those of the company's, this conflict of interests must be declared and remedial action taken.

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

any aspect of our employer's business.

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

We don't accept bribes from or offer them to our partners. However, it may be acceptable for us to exchange gifts of small value if neither we, Nordic Morning nor its brands are compromised by doing so.

As representatives of Nordic Morning, we are politically neutral: we must not affiliate ourselves with or support political parties or politicians. We may, however, have political parties as our clients.



PARTNERS

We view suppliers and subcontractors as partners, and believe they should be fairly rewarded for the work they do. They should be treated equally and their services should be assessed objectively based on price, quality and reliability.

We should expect any partner we collaborate with, to adhere to the Code of Business Ethics that is consistent with our own. As we fundamentally oppose illegal and unethical labor practices, we require our partners to do the same.

We respect the intellectual property of our partners – including patents, trademarks, trade secrets and similarly sensitive information – and require them to do the same in return.



CUSTOMERS

We help our customers transform their business, marketing and communication through data- and insights-driven innovations combining content, service design, visibility, and customer dialogue.

Our relationship with customers is based on trust. We will always treat the customer information confidentially. We would, for example, always seek a customer's approval before openly discussing or publicizing a service we have created for them. When dealing with a complaint from a customer, we act quickly and professionally to assess the issue and resolve any problems as soon as we become aware of them.

In every aspect of our business, our communication must always be honest and accurate.



CORPORATE RESPONSIBILITY

Nordic Morning's corporate responsibility is based on the triple bottom line: people, profit and planet.

- **People:** We are committed to building a culture of engagement, providing our employees with learning opportunities, talent nurturing, inspiring leadership and fair rewarding for achievements. We are an equal-opportunities employer.
- **Profit:** We produce added value for our employees, customers and the owner. Important stakeholders also include partners, investors and the countries and municipalities in which we operate.
- **Planet:** We reduce our environmental impact by investing in environmentally responsible operations, products and services and by promoting environmental awareness amongst our employees.



COMPLIANCE

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

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

Any activity that is inconsistent with our Code of Business Ethics must be reported immediately, and the violation must be remedied as soon as possible and followed up.

The Group will ensure that there are no adverse consequences for employees who highlight breaches of the Code of Business Ethics. Employees can report any allegations of potential violations confidentially, and even anonymously, to the CEO of Nordic Morning.

Nordic Morning Group's policies and decision making are based on our values and corporate governance. You can find the corporate governance and learn more about our policies on <http://reporting.nordicmorning.com>

OUR POLICIES

Corporate Responsibility

Nordic Morning's Corporate Responsibility program encompasses economic, social and environmental responsibility. Our CR program is presented at <http://reporting.nordicmorning.com>

Human Resources policy

HR drives competence development and engagement at work. Talent acquisition and development are seen as key functions for reaching the group's strategic goals. Also, HR works for ensuring that Nordic Morning group is perceived as an attractive employer.

Communication policy

We provide our stakeholders with accurate and up-to-date information about Nordic Morning's objectives and operations. Our communication is consistent with our values and done in an open and trustworthy manner.

Risk management

Regular risk monitoring helps us to identify risks related to our business operations and react to them in advance. A risk can be anything that might have an impact on the company's ability to meet its business objectives.

Environmental policy

We have had a systematic approach towards sustainability since the beginning of 1990s, and

we continue to reduce the environmental impact of our operations.

Health and safety policy

We are committed to providing a workplace that is safe and conducive to good health, free from bullying, harassment and favoritism. The use of alcohol and illicit drugs is prohibited during work time. Nor should an employee's performance at work be affected by the use of any substance in private time.

Social media policy

Employees are encouraged to use social media for work-related purposes in line with Nordic Morning's values and Code of Business Ethics. When using social media to communicate, we must not distribute disparaging or confidential information about Nordic Morning, its brands, customers, our colleagues, partners or other stakeholders.

Sponsorship policy

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

IT policy

Ensures that all IT resources provided by the Group IT are used responsibly and according to the law.

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