

Code of Business Ethics

Bonnier Books

Version 1.0

Table of Content

Introduction	3
Scope of the Code of Business Ethics.....	3
Business Ethics.....	3
We Take Responsibility	3
Anti-corruption.....	3
Trade Sanctions	3
Support of Fair Competition	4
Avoidance of Conflict of Interests.....	4
Respect for Confidential Information.....	4
Respect for Privacy and Personal Information	4
Bonnier Books' Property is used with care.....	4
Respect for Human Rights.....	4
Employees	5
Bonnier Books Values Talent, Professionalism, Integrity and Entrepreneurship.....	5
Environment	6
To Control and Reduce the Environmental Impact of our Operations is a Priority.....	6
Personal Responsibility and Reporting Violations	6
Personal Responsibility.....	6
Procedures with Regards to Violations of the Code.....	6
Whistleblowing	6

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Introduction

Scope of the Code of Business Ethics

Bonnier Books Code of Business Ethics embodies standards of business conduct and ethics that all employees, managers, executive officers, and members of the board of directors must follow both when it comes to decisions related to work tasks as well as to relationships with fellow employees, suppliers, customers, owners and other stakeholders. These standards are based on sound business practice, responsibility, and common sense and are intended to encourage a high degree of personal and professional integrity. Bonnier Books expects consultants and advisors to follow the same principles.

For each Business Unit within Bonnier Books, the respective management is responsible for providing information about, implementing and monitoring the guidelines in Bonnier Books Code of Business Ethics. Based on the Code, each Business Unit shall develop concrete and relevant guidelines and monitoring procedures for how the Code and these commitments are to be implemented in practice.

Bonnier Books also has a Supplier Code of Conduct for suppliers and business partners, outlining our expectations on all external partners.

Business Ethics

We Take Responsibility

All employees and representatives are expected to show honesty and integrity in dealing with coworkers, customers, suppliers, business partners, organisations and authorities.

We do not make short-term decisions that threaten Bonnier Books reputation.

We take personal responsibility to stay informed about the Company.

We do not promise more than we can deliver.

Anti-corruption

The business operations of Bonnier Books are to be performed in accordance with all applicable anti-bribery laws and regulations. Bonnier Books makes active efforts to ensure that corruption does not occur within our business.

We do not put those reporting to us, our co-workers or our managers in compromising positions.

We do not seek to gain or retain business by offering, promising or giving as well as requesting, accepting a promise of or receiving a bribe. We are very restrictive regarding the giving and receiving of benefits such as hospitality and gifts.

For further instructions, please see the Anti-corruption Policy.

Trade Sanctions

All business shall be carried out in compliance with United Nations sanctions and applicable sanctions under the laws of the European Union and the United States.

For further instructions, please see the Trade Sanctions Policy.

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Support of Fair Competition

Bonnier Books support and aim to achieve fair competition. Employees in Bonnier Books must therefore comply with all relevant competition rules and refrain from concluding unlawful anti-competitive agreements as well as exchanging unlawful price and/or market information with competitors.

Avoidance of Conflict of Interests

Bonnier Books employees shall always work in the best interests of Bonnier Books and avoid all acts that might be perceived as favouring a company, organisations, individuals or other stakeholders at Bonnier Books expense. Employees shall avoid all types of activity that violate the Company's interests or have a negative effect on the employee's judgement and integrity. Agreements with or other forms of assignments to related parties shall be avoided, and always be reported to and expressly approved by the respective Company's management.

Respect for Confidential Information

Employees within Bonnier Books may not spread or abuse confidential information. Examples of confidential information include non-public information about Bonnier Books operations, financial position, strategies, business transactions, business plans, etc.

Respect for Privacy and Personal Information

Bonnier Books respects the privacy rights of our users. Protecting the privacy of the individual users is key to maintaining long-term user confidence and relationships. Management within Bonnier Books is responsible for ensuring that personal data in their operations is handled in accordance with applicable laws and regulations.

Bonnier Books' Property is used with care

Bonnier Books has both physical assets (machinery, equipment, etc.) and intellectual property (computer systems and programs, concepts, trade secrets, brands, etc.) These assets, including communication systems, may only be used for legitimate business purposes and not for personal gain or gain for a third party. All employees have a duty to protect Bonnier Books property and assets against damage, theft and misuse. Use of computer equipment shall be in accordance with prevailing IT policy.

Respect for Human Rights

Bonnier Books respects the UN conventions on human rights. We accept the responsibility we have towards our employees and the communities in which we operate. As a minimum, Bonnier Books complies with the laws and regulations that apply in the countries in which we operate.

Bonnier Books is against purchase of sexual services and child pornography. Purchase of sexual services and sexual exploitation of children is illegal based on legislation in several countries, including Sweden, and can support trafficking, which is a violation of human rights. Employees within Bonnier Books on assignments and business travel, also internationally, are expected to respect this stance. This applies irrespective of country and both during and after working hours.

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Employees

Bonnier Books Values Talent, Professionalism, Integrity and Entrepreneurship

We attract and provide the industry's best employees with good opportunities for personal development and careers in one of the media world's most stimulating workplaces.

The working environment is shaped by creativity, joy and passion. The atmosphere is open and strong opinions are an asset. We take the initiative and with our responsibility comes a lot of freedom. We are friendly with and thoughtful of one another. All employees understand and work towards the corporate vision, business idea and goals. Decision-making isn't drawn out and we make smart and profitable decisions.

Our employees shall be offered a safe and healthy work environment which we continuously seek to improve.

The conditions of employment offered to employees must meet the minimum requirements in national law and/or collective agreements as well as relevant ILO conventions. Bonnier Books makes every effort to pay fair salaries and remuneration in accordance with relevant norms in the locations in which the Company has operations.

We offer all individuals equal opportunities regardless of skin color, gender, nationality, religion, ethnicity or other distinguishing characteristics. We make active efforts to achieve a corporate culture and workplace free from discrimination and harassment. Employees within Bonnier Books have a joint responsibility for this to be achieved.

Bonnier Books rejects child labor and forced labor. We do not employ any person under the age of 15 or any applicable higher statutory minimum age. We do not accept forced labor, slave labour or other forms of involuntary labour at our workplaces.

Based on values of Bonnier Books, every Company within Bonnier Books shall ensure adequate procedures to comply with these principles and:

- Ensure that employees are well informed of their Company's business idea, goals and vision.
- Follow laws, contracts and regulations pertaining to employees.
- Strive for trust in the cooperation between management and employees.
- Educate managers and develop their skills on issues related to labor management, empowerment, gender equality, health and safety.
- Respect the right of employees to join associations and organizations, and to organize and take part in collective bargaining.
- Ensure that all employees have the right skills to perform their duties in the best possible way.
- Actively promote health and well-being in the workplace.
- Respect every individual employee and promote freedom of expression as a hallmark of the Company culture.
- Work actively against discrimination and harassment, whether inside or outside the Company.

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Environment

To Control and Reduce the Environmental Impact of our Operations is a Priority

All businesses shall carry out their own active environmental efforts. Fundamental to these efforts is that each business follow the relevant environmental laws, regulations and standards for the respective business units.

In our operations we will, wherever possible, work to reduce our environmental impact by preventing and reducing pollution and the use of harmful substances and contribute to long-term, sustainable development through active and systematic environmental work. We prioritize and aim for processes, methods, products and services that have minimal impact on the environment.

Personal Responsibility and Reporting Violations

Personal Responsibility

All parties concerned have a responsibility to be aware of the Code of Business Ethics, its guidelines and their implications in relevant contexts. In the event of questions or doubts about what the guidelines imply or how they should be put into practice, (e.g. giving or receiving of gifts/rewards or conflicts of interest), the immediate manager should be consulted in the first instance.

Procedures with Regards to Violations of the Code

At Bonnier Books, employees are expected not just to abide by the rules but also to point out when others do not. If an employee suspects a possible behavior that deviates from the Code of Business Ethics, relevant rules or laws, it should be reported to an immediate superior or another manager within the same organization as soon as possible. If such person is involved or otherwise disqualified, or there is a fear of unwanted consequences, information can be provided to those responsible for receiving whistleblowing reports at Bonnier Books, either directly or by using Bonnier Books whistleblowing channel.

Bonnier Books will ensure that immediate disciplinary actions, such as termination of employment, are taken against those who violate this Code of Business Ethics and that circumstances in violation of applicable laws and regulations are reported to the relevant authorities.

Whistleblowing

The HR manager at each workplace, or another person designated by the relevant CEO, is responsible for informing employees about the Bonnier Group Whistle Blowing Channel and providing information and linking to the tool appropriately, for example through the company's intranet or equivalent.

Adopted by the Board of Directors of [Company AB] on [day/month/year].