

# Code of Conduct

○○○ Ringier

# Introduction

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## Objective

With this Code of Conduct, all employees of Ringier commit themselves to act in compliance with the law and to high professional and ethical standards. In this way we establish our credibility – as an employer, business partner, competitor and as a responsible contributor to society. And we establish the basis for our success.

This Code of Conduct supports us in our daily engagement at Ringier by defining the company's basic values and the binding rules of behaviour that guide our actions.

We value and appreciate each and every contribution that allows us to act transparently, fairly and independently in a joint effort as a considerate and successful company.

## Scope of the Code of Conduct

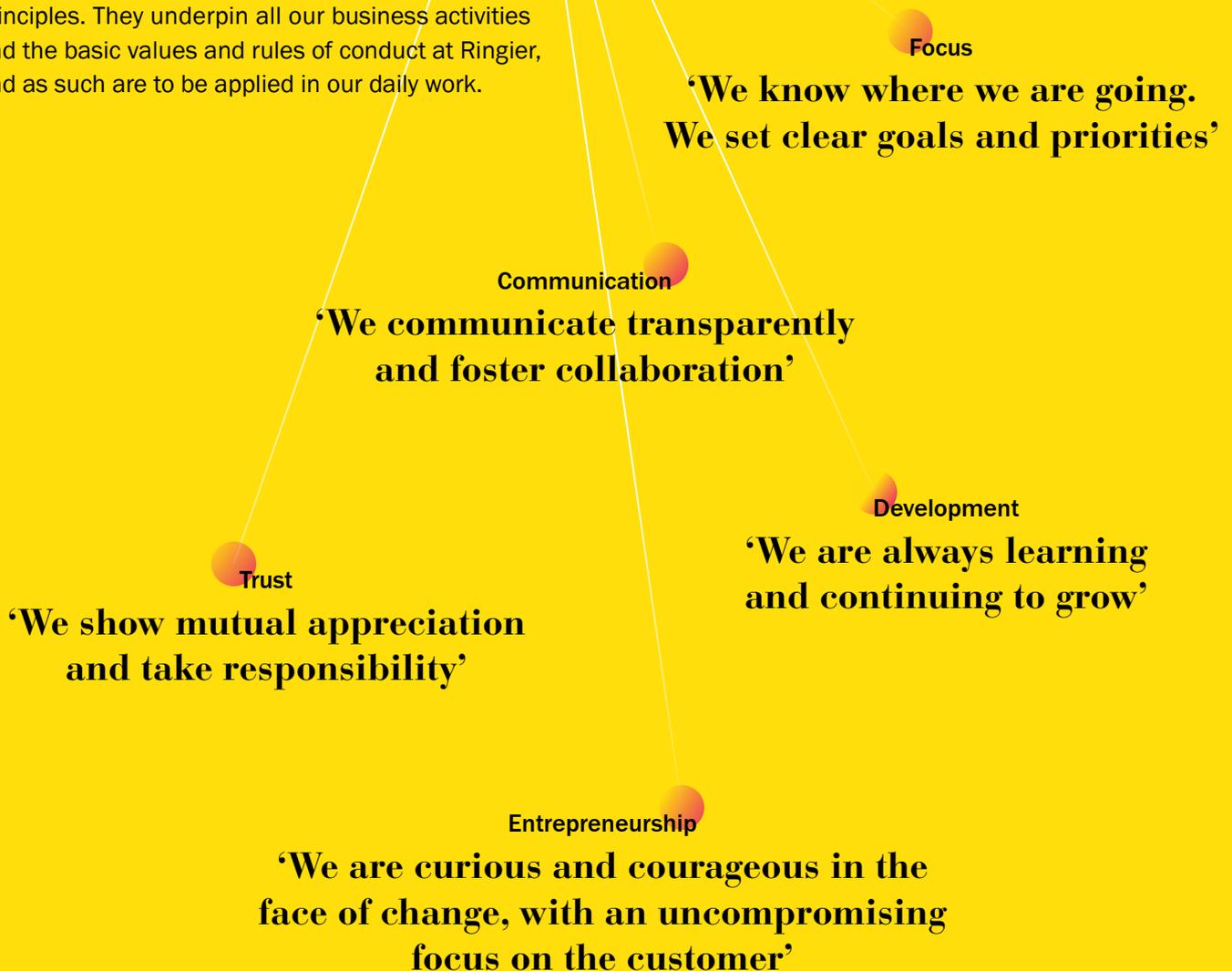
This Code of Conduct applies to all employees of the Ringier Group. In this context, Ringier Group means all companies that are directly or indirectly controlled by Ringier AG through a voting share of more than 50%.

# 1 Five to Lead – our leadership principles

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## ‘We act in accordance with the ‘Five to Lead’ leadership principles’

‘Five to Lead’ (or 52L) stands for our leadership principles. They underpin all our business activities and the basic values and rules of conduct at Ringier, and as such are to be applied in our daily work.



## 2 Fair, compliant management

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**‘We act  
ethically,  
fairly  
and  
lawfully’**

At Ringier, we comply with all relevant local, national and international legislation and provisions applicable in the areas in which we operate. We will not tolerate violations of the applicable law or of this Code of Conduct or other internal rules, regardless of the country or business in which we are operating. Ethical, legally unimpeachable behaviour underpins the success of our group and is an integral component of our self-image.

**We are fair and respectful in our dealings with business partners and third parties.**

**We treat others the way we wish to be treated ourselves. We categorically avoid false, misleading or disparaging remarks about third parties.**

### 3 Equality and discrimination

Our ability to deliver excellent results is based on a diversity of ideas and thus diversity of people. We stand for equality of opportunity and foster a working environment distinguished by respect and tolerance, and which recognises the value and dignity of every individual. We are respectful. Inclusion and diversity are key success factors at Ringier.

Regardless of our position within the Ringier Group, we treat all employees fairly at all times and never discriminate. Similarly, we never demean third parties. Harassment, bullying and intimidation are not tolerated. We condemn and denounce any form of discrimination or exclusion based on gender, background, ethnicity, age, way of life, sexual orientation or other diversity characteristics.

**‘We treat each other respectfully and value the diversity of all our employees’**

In the event of discrimination, harassment or bullying, managers and HR are on hand to assist. Alternatively, employees can use the ‘Speak Up’ line, a whistle-blowing facility.



## 4 Health, safety and the environment

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# ‘We maintain a healthy work environment and protect our environment’

We provide a healthy, hazard-free work environment for our employees through compliance with the legislation and rules concerning health and safety in the workplace, and by ensuring fair working conditions. We take care to protect the health of colleagues and third parties. At Ringier, we consider environmental aspects by making responsible use of resources.

## 5 Data protection and confidentiality

# ‘We protect and value data’

We protect personal data and confidential information from unauthorised access, loss or misuse. We collect, process and use personal data only to the necessary and permissible extent.

We understand confidential information to include information that is not (yet) published, such as business secrets, business plans, instructions, designs, databases and datasets, and financial data.

We understand personal data to include information that relates to an identified or identifiable private individual (and in some cases to legal entities, such as Ringier AG, depending on local rules). Examples are names, addresses and dates of birth.

In the event of data security infringements or problems with data security, IT Security and the Data Protection Office can provide further assistance.

## 6 Conflicts of interest

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# ‘We act in the **interests** of Ringier’

If conflicts of interest arise, we bring them to the attention of our manager and ensure that they are resolved fairly, transparently and in the best interest of the company.

We avoid any situation that could give rise to conflicts of interest between us or our next of kin and Ringier. Should potential conflicts of interest nonetheless arise, we address them proactively and work with our managers or HR to find a solution that complies with the rules.

## 7 Bribery and corruption

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Ringier prohibits any form of corruption. Our relations with business partners, public officials and other individuals are based on trust, merit and the quality of our products and services, and never on gifts, payments or favours.

We do not participate in any form of bribery or corruption – direct or indirect, active or passive; i.e. the granting, promise, offer or acceptance of gifts, invitations, payments or other benefits intended to influence or facilitate a business transaction or decision.

We are not permitted to offer, directly or indirectly via third parties, financial or other benefits in order to influence a business deal or transaction.

The converse situation – that is, the acceptance of benefits as consideration for preferential treatment – is prohibited.

‘We act **fairly**  
and **responsibly**, and  
do not tolerate bribery  
and corruption’

## 8 Gifts, hospitality and invitations

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**‘We impress with our quality and skills, and exercise moderation in customer relations’**

Gifts and invitations that may help further business relations or to present products or services are – in moderation – permitted. However, such contributions must be accepted or granted only if they serve a transparent business purpose, and must not be accepted or granted as consideration for any unlawful advantages. The contribution must not be of disproportionately high value nor must it disproportionately exceed the limits of business behaviour or the normal living standards of the recipient. Generally, gifts to public officials must be avoided.

We do our best to remain objective and fair in all our business relationships. We do not allow ourselves to be influenced by the acceptance of gifts, advantages or invitations of any kind, for ourselves or for the benefit of our next of kin.

**If in doubt, we inform our manager in order to discuss the situation.**

## 9 Fair competition

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# ‘We stand for fair and free competition’

Ringier is committed to fair and free competition and holds itself in strict compliance with applicable competition and antitrust regulations. Relationships and arrangements with competitors, suppliers, distribution companies or retailers that may impair fair competition are prohibited.

Examples: pricing arrangements, the allocation of customers or business between competitors, anticompetitive boycotts and other improper competitive methods.

‘We act responsibly when dealing with Ringier’s property’

We believe in responsible handling of the property and material and immaterial assets of Ringier. This includes, in particular, work tools made available to us, such as computers, mobile telephones, office equipment, and other assets. These resources are to be used only for the intended business purpose. We protect them against destruction, loss, theft or misuse.

## 11 Journalistic integrity

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**‘As a media company,  
we are aware of our  
responsibility to the  
public and we treat  
this with care’**

Journalistic independence forms the basis of information and entertainment in the form of printed, digital and electronic media at Ringier. Media outlets have freedoms and bear responsibility, they have rights and obligations. As journalists of the Ringier Group, we act independently of people, companies and public authorities, and avoid infringing professional rules in our work. The editorial offices undertake to respect privacy and to deal responsibly with information, opinions, images and other intellectual property.

## 12 Infringement of the Code of Conduct

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All employees of companies that form part of the Ringier Group are responsible for following the principles of this Code of Conduct and any other internal guidelines, regardless of the country in which their company operates.

In the event of infringement of this Code of Conduct, the employer may impose sanctions. The form and extent of the sanctions depend on the degree of infringement and in particular the contractual and legal arrangements of the employment relationship.

**‘We comply with the  
Code of Conduct  
and other applicable  
provisions’**

Employees of the Ringier Group who are unsure whether an action or failure to act infringes certain provisions are requested to inform their manager or the internal legal department.

## 13 Reporting violations

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‘We act with integrity at all times’

Employees are responsible for reporting infringements of this Code of Conduct, or other significant circumstances, to their manager. If they have a valid reason not to contact their manager, they can speak to the head of Human Resources and/or the CEO of their company or the applicable Ringier country organisation. Employees in editorial positions should contact their editor-in-chief.

Alternatively, employees can use the ‘Speak Up’ line, a whistleblowing facility. If their organisation does not have a ‘Speak Up’ line, they should contact the management of the respective country organisation.

Infringements can be reported confidentially and anonymously. And of course, employees who report in good faith shall not face any negative consequences.

# Code of Conduct

## Ringier AG

Board of Directors and Group Executive  
Board of Ringier AG

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