



# Readly

## Code of Conduct

2024



# Message from the CEO

The culture at Readly is truly remarkable, defined by empowerment, a flat organisational structure, and a strong sense of collaboration. The Readly employees are known for their dedication, and approachability. Empowerment, a fundamental aspect of our culture, comes with the responsibility we all share, transcending age, gender, religion, and individual uniqueness. Fostering a respectful and caring atmosphere, where everyone takes ownership of their actions, decisions, and interactions, is crucial to empowering each employee and ensuring collaborative success.

Readly has achieved significant milestones and navigated various stages of growth, emphasising the importance of preserving and advancing our unique culture for the ongoing prosperity of the company. Our Readly culture is a dynamic entity, continuously evolving as we recruit new talents, welcome subscribers, establish partnerships and collaborate with publishers worldwide.

So, why do we find it necessary to establish a Code of Conduct? Simply put, it provides clarity on our

values and responsibilities to one another and all our stakeholders. The Code also serves as a reinforcement, encouraging us to speak up if anyone falls short of our high standards in conducting business. A Swedish proverb aptly reminds us, "A small tuft often tumbles a big load," signifying that addressing even a minor misstep is crucial to prevent larger crises. Our success is tied to our sterling reputation, and the trust our stakeholders, including our own team, place in us to deliver on our promises. Let us cherish and uphold this trust.

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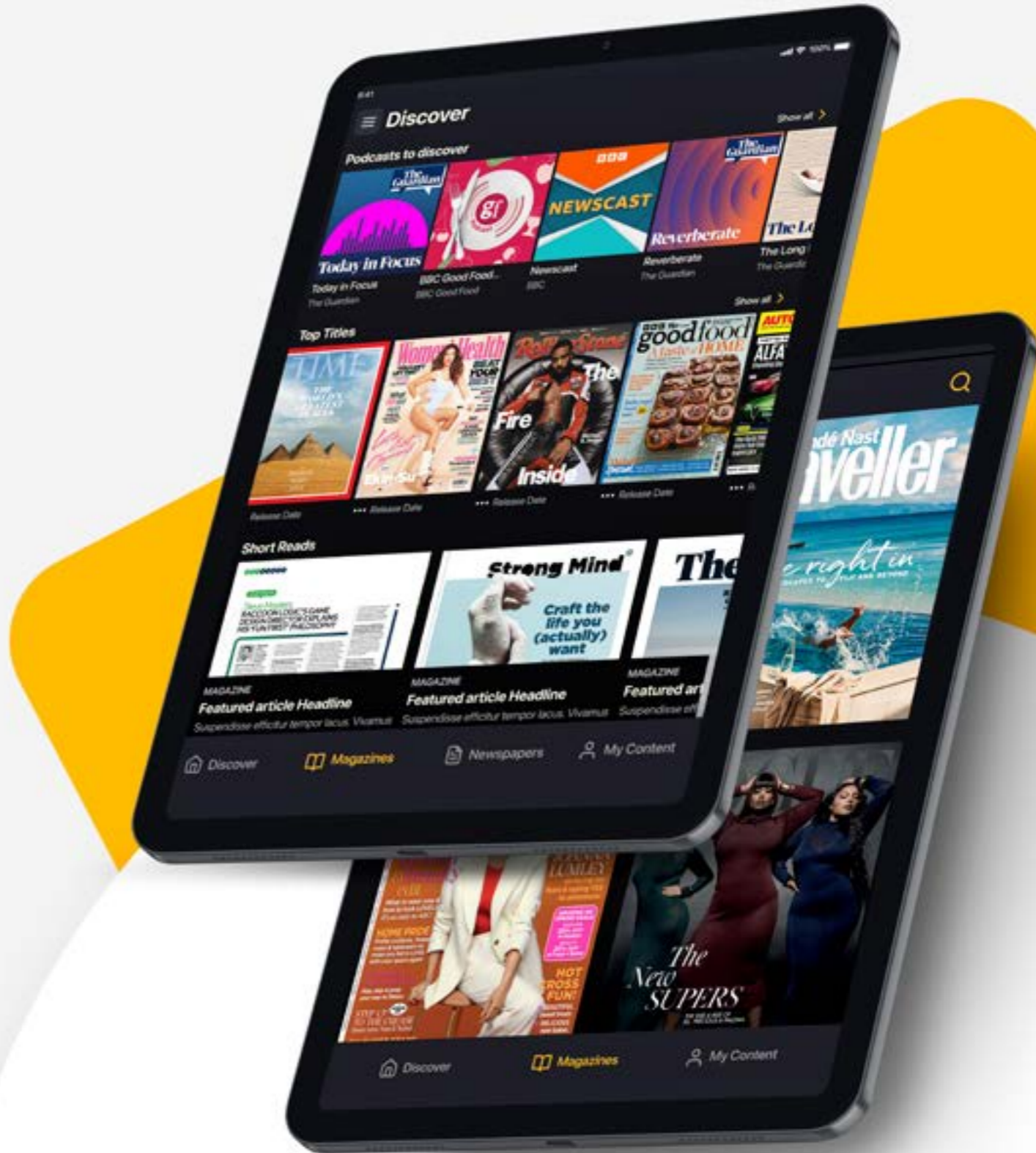
**"With empowerment comes responsibility - regardless of age, gender, religion or whatever makes us differ"**

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This is Readly's Code of Conduct. Use this compass to lead and navigate the digital shift of the magazine and newspaper industry!

Philip Lindqvist, CEO Readly

# This is Readly.



# Vision & Purpose

## **Purpose** - the Why?

Unlocking a world of  
editorial content.

# About the Readly Code of Conduct

## What is a Code of Conduct?

A Code of Conduct articulates the values, principles and culture an organisation wishes to foster in leaders and employees, and in doing so, defines desired behaviour. A Code of Conduct further ensures that business is conducted based on the highest ethical standards and in compliance with all applicable laws and regulations in the countries we operate in. We want our stakeholders to be able to trust that we will always do the right thing whilst pursuing our vision and purpose.

## Basis

The Readly Code of Conduct (the “Code”) incorporates the Ten Principles of the United Nations Global Compact, our Readly Mindset and what we at Readly generally consider to be proper and responsible behaviour. It guides us in our daily work as a company, as colleagues and as citizens.

The Code will be reviewed periodically and the Board of Directors is responsible for reviewing the Code. As this Code of Conduct applies to employees in a variety of countries, please be aware that local laws and regulations imposing stricter or more specific rules may apply for your country. In the case of conflict between this Code and mandatory local laws or regulations, the local laws or regulations shall prevail.

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## Scope

This Code covers Readly’s business operations in all countries where we operate and applies to all of us at Readly, from the members of our board of directors and the Senior Leadership Team, to each individual manager, employee, consultant or contractor. We further expect anyone we do business with to adhere to similar values and ethics.

## Responsibility

We all represent Readly and every single one of us is responsible for nurturing and protecting the Readly brand, contributing to our success and caring for our impact on people and society. That is why every employee needs to read, understand and comply with the Code and also promptly raise concerns about any behaviour not in compliance with the Code. Further, all employees must always comply with all applicable laws, rules and regulations when performing their duties.

All leaders at Readly should lead by example and act in accordance with the Code at all times. We want to create an environment where discussing ethical conduct is encouraged and people feel confident and free to speak up.

All new employees shall be introduced to and understand the Code as part of their onboarding process.

*Please take the time to read and understand this Code. If you have any questions on the Code or are not sure how to behave in any given situation, just ask your manager or send an email to [legal@readly.com](mailto:legal@readly.com)*

## Not sure? Ask yourself:

- Does it reflect our Readly Mindset?
- Is it good for Readly and for my colleagues?
- Would I feel ok if everyone knew about it?

If you can answer “YES” to all of these questions, it is probably ok to proceed. If not, you should stop and consider and ask for help.

# Upholding the Code

## How to report concerns

Ready promotes a company culture where discussing ethical issues is an integral part of business, and where employees feel comfortable raising issues regarding unethical business conduct, breaches of our Code, breaches of laws and regulations or any other integrity concerns. If you have a concern (even if you do not have all the details), you have a responsibility – even an obligation – to raise that concern in a timely manner.

## Ready's Whistleblower system

Ready's Whistleblower system shall be used when there is reason to suspect that laws, policies or the Code of Conduct are being violated. Examples of misconduct can consist of, but not limited to, bribes and corruption, fraud, market manipulation, discrimination, harassment, threats against work environment, health, and security.

Every employee should, without fear of reprisal from anyone, use the Whistleblower system to inform our Chief People Officer, who receives the reports, of any such improper activity. Any concern raised will be handled seriously, impartially and confidentially, no matter how minor the concern may be. Suppliers, customers and other external stakeholders involved with Ready, may report suspected violations by using the Whistleblower system.

Regarding employment-related issues such as conflicts with colleagues or managers, disciplinary actions, salary, or benefits, it's advisable to address or report them internally first, except in cases of extreme seriousness as previously outlined. We suggest initiating discussion with your manager as the initial step. However, if you feel uncomfortable doing so, the external Whistleblower channel can serve as an alternative.

## How does the Whistleblower system work?

The reporting is done through a secure channel handled by an external provider, &frankly where the whistleblower can be anonymous towards Ready if the whistleblower doesn't themselves leave information in text format that can reveal their identity. The tool will create a case and case number for the whistleblower and the whistleblower will get an update by email/phone number when the case has an update.

<https://app.andfrankly.com/whistleblower/dashboard/JyMu7D6ofY1wbwww>

*Please note: All concerns related to fraud, bribery or corruption must immediately be brought to the attention of the Chief Financial Officer.*

## What should be reported?

- Violations of Ready's Code of Conduct
- Violations of Ready policies
- Violations of local laws and regulations
- Anything not covered by the above, but which you find sufficiently serious to report

## No retaliation

No one will suffer any adverse consequences as a result of raising a concern in good faith about any potential misconduct. Retaliation of any kind against such an employee will not be tolerated and may lead to disciplinary action, up to and including termination.

## Consequences

Behaviour that is not in compliance with our Code can have serious consequences for both employees and Ready.

Ready will take all appropriate steps to investigate such conduct. Failure of a Ready employee to follow the Code can result in disciplinary measures including termination of their employment with Ready.

# Q & A

## What is expected of me as an employee?

**Make sure you read, understand and comply with the Code. By reading this Code you should feel empowered to speak up if someone does not adhere to the Code and know what to do.**

## I suspect—but am not certain—that someone is violating our Code. Should I keep my concerns to myself?

**No. If you suspect a violation, say something. It's better to raise a potential problem than to wait and risk harm to others or to the company. Reporting "in good faith" means you are coming forward honestly with information that you believe to be true, even if, after investigation, it turns out that you were mistaken.**

## I am afraid to report a concern about someone who is in a leadership position. What should I do?

**It is important to say something about your concerns. Everyone at Ready is required to adhere to the Code and Ready will take all appropriate actions to protect the identity of the person who is sharing the information, as well as the information that is being shared.**

# Readly as a workplace.

This section covers how we act in our different internal roles – the way we treat each other as colleagues, how we act as leaders, how we operate as an employer and what important values we believe will ensure that Readly and its employees grow and prosper.

## Readly mindset

Readly aims to be a company where the concept of “company culture” is highly tangible. To be successful in our vision of inspiring millions of people to discover and enjoy the power of great editorial content from across the globe, to grow and prosper both as a company and as individuals, we believe that we all need to work, act and interact with a specific mindset - the Readly Mindset. It is each and everyone’s behaviour day to day that defines our success and our individual experience of being part of Readly.



### Be Brave

Behaviours reflecting the Be Brave mindset include:

- I challenge the status quo
- I take initiative and ownership
- A mistake that we learn from is not a failure
- I bring passion and grit
- I constantly seize new opportunities to grow our business



### Say it as it Is

Behaviours reflecting a Say it as it Is mindset include:

- I build trust through honesty, transparency and mutual feedback
- I share information openly and proactively
- I communicate in a clear, crisp and respectful way
- I talk to you, not about you
- I listen actively to fully understand my colleagues and our customers



### Win as a Team

Behaviours reflecting a Win as a Team mindset include:

- I am curious and always willing to learn
- Disagree, discuss and commit
- I challenge others’ ideas but respect a decision once it has been made
- We help each other and share credit
- Our ecosystem’s success is my driving force

### Human Rights

Readly supports and respects the principles set out in the United Nations Universal Declaration of Human Rights and does not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced or prison labour or human trafficking.

### Diversity & Equal Opportunity

Our differences are what make us great as a whole. Readly hires and treats its employees in a manner that does not discriminate based on gender, nationality, religion, race, age, disability, sexual orientation, political opinion, union membership, or social or ethnic origin. Readly has a culture of equal opportunities and diversity where appointments to job positions, rewards and personal success are determined based solely upon individual ability and performance. We do not tolerate discrimination in any form.

The dedicated Diversity, Equity, and Inclusion (DEI) committee at Readly focuses on fostering a more inclusive and equitable workplace environment, ensuring that diverse perspectives and voices are recognized, respected, and integrated into our organisational practices and decision-making processes. It works collaboratively to implement strategies and initiatives that promote DEI across all facets of our organisation.

Further information is found in Readly's Diversity, Equity & Inclusion policy.

### Right to Freedom of Association and Collective Bargaining

Readly respects and supports internationally proclaimed labour rights. We recognize and respect the right of employees to associate and their right to collective bargaining. We will not use child or forced labour.

### Harassment

All employees have the right to be treated with respect and with regards to each and everyone's just claim to integrity. Any unwelcome approaches in the form of sexual harassment, discrimination, insulting treatment or any other kind of harassment are strictly forbidden and should be reported immediately.

Bad mouthing colleagues, competitors or customers, is not acceptable behaviour.

It is a violation of our Code to display, share, upload, download or circulate offensive materials e.g. texts, images or videos which are discriminatory, harassing, violent, illegal or in any other way inappropriate.

*For further information, please refer to the Work Environment Policy regarding discrimination, harassment and victimisation.*

# Q & A

## My colleague made a comment that made me feel uncomfortable. Is that harassment?

**It could be. If it was intended solely to upset you then yes - that is harassment. Talk to that colleague and talk about how you feel. If you cannot sort it out amongst yourselves and put an end to such behaviour then you should raise your concern to your manager or the Chief People Officer.**

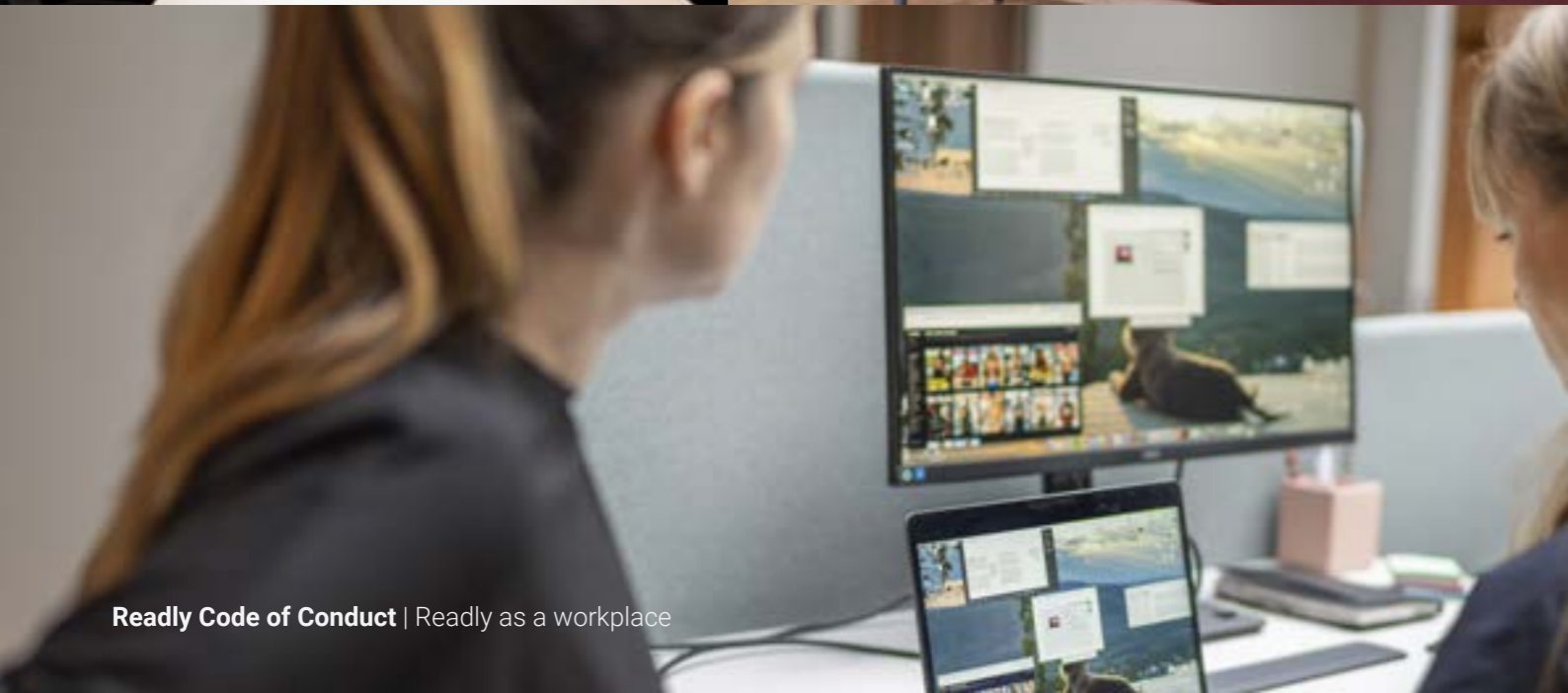
## My manager often loses her/his temper and yells at the team when they miss a deadline. Is that harassment?

**Direct feedback is always best. If you feel comfortable doing so, ask the person to stop his/her behaviour. If not, connect with the People Team.**

## One of our publishers is making insulting, age-related remarks to one of my colleagues. Should I say something?

**Yes. If you're comfortable doing so, ask the business partner to stop. If not, report your concern.**





**Health & safety**

Ready is committed to ensuring a safe work environment by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions, in accordance with internal policies on work environment.

We care for each other and strive to protect and promote the physical and emotional health of all employees. Our Work Environment Committee, with representatives from all offices, contributes to ensuring a sound work environment. A wellness benefit is granted to all employees.

We adhere to, and comply with, all applicable local Health and Safety laws and regulations in all of our office locations.

**Drugs and alcohol**

Working under the influence of alcohol or drugs is strictly prohibited. There may be instances where drinking alcoholic beverages while conducting company business is permitted (for example at a business dinner or a company event), but make sure you always exercise both moderation and good judgement.

*For further information, please refer to the Work Environment Policy.*

**Protecting Ready assets**

All company assets belong to Ready. We make proper and efficient use of our property and resources such as office space, office equipment, computers, mobile phones and IT systems (e.g. company email, internet, slack). Personal use of assets such as phones, computers, email and the Internet is permitted, but make sure your use does not interfere with work (yours or anyone else's) and does not violate our policies or the law.

Be aware that anything you write, send, download or store on our systems is company property, and we may monitor your use—you should not have any expectation of personal privacy when using our systems.

Spend Ready funds wisely and avoid waste and abuse. When you submit an expense for reimbursement or spend money on Ready's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. If you are uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager. Managers are responsible for all money spent and expenses incurred by their direct reports and should carefully review such spend and expenses before approving.

*For further information, please refer to the Expenses Policy and your contract of employment.*

## OUR ENVIRONMENT

### Contracts

Any contract between any Readly entity and a third party needs to be reviewed and signed off by the Legal department. All agreements shall have clear terms and conditions and be in written form. Only persons authorised to do so may sign contracts on behalf of Readly.

### Intellectual property

Readly's intellectual property rights (our trademarks, logos, copyrights, trade secrets, and "know-how") are among our most valuable assets. We safeguard our intellectual property rights by registration, usage of copyright symbols, strict procedures and reporting of improper use from third parties. Readly respects the proprietary rights of others by complying with all applicable laws and agreements.

For further information, please refer to the IT and Information Security Policy.

### Political activity

Readly is politically independent and does not financially, or otherwise, support political parties or individual politicians. We do not impose political views on one another. Employees may participate in political activity as long as they do not make reference to Readly or their employment with Readly.

### Dealing with governmental actors

All prescribed guidelines in this Code of Conduct apply to public officials and government bodies. Moreover, Facilitation payments to public officials with the purpose to rush desired actions is strictly forbidden at Readly. Payments to governmental agencies that are in line with domestic legislation are not defined as facilitation payments.

### Donations and Sponsorships

Charitable donations and sponsorships are permitted, if they are in accordance with the applicable rules on expenditure and budget and follow the normal approval procedures for expenditures. The donations or sponsorships shall

be promised or granted without the purpose of creating a conflict of interest or bribery and have recognizable charitable aims. Charitable donations and sponsorships of a considerable amount, paid by or on behalf of the company, must be approved by the Legal Department.

### Confidentiality

We all have a responsibility to prevent unauthorised persons, both internal and external, from gaining access to confidential information related to Readly, our employees, business partners and users. Such information includes financial data, business plans, contracts, databases and user or publisher data.

At Readly, Information is classified as either public, internal, restricted, or confidential depending on its sensitivity and must be handled accordingly. Caution is a prime requirement when working, taking work-related calls or discussing work-related matters in public places such as on planes, trains or in elevators etc. Be careful when sending or forwarding confidential information via email. Always obtain a signed non-disclosure agreement (NDA) before confidential information is shared with external parties. If you leave Readly, your obligation to protect confidential information continues until the information becomes publicly available.

It is very important that you adhere to the regulations from our IT department such as updating software, following password policies and being careful when visiting unknown websites, installing unknown programs/applications or when opening unknown attachments, links or emails. Always report to the IT department if you suspect that there has been a security incident and/or data breach.

*For further information, please refer to the IT and Information Security Policy and your contract of employment.*

## Q & A

### **A salesperson for a competitor and I are friends. Occasionally we talk about marketing plans. Should I be concerned?**

**Yes. You are revealing confidential information that Readly has invested time and money to develop. You also may be violating competition laws that ban discussions of marketing and pricing.**

### **I sometimes need to answer emails from my private computer. Is that ok?**

**That is okay as long as you are using your Readly Google email account and do not download or store Readly files on your private computer but instead on Google Drive.**

# Readly as a business.

Readly would not exist if it were not for our customers and other stakeholders. It is crucial for us to be perceived as a pioneering, responsible and trustworthy company in the publishing industry, known for being committed to the highest ethical standards in all touchpoints and transactions. We conduct business in full compliance with all applicable laws and regulations.

## **Commitment to customers**

We are committed to providing the best product experience to our users and delivering efficient and accurate customer service. We treat subscribers and publishers fairly and considerately. We strive to be seen as a trustworthy partner by our publisher partners. We use feedback from our customers as a measure for continuous improvement.

## **High standards**

What we expect of ourselves we also expect from those we do business with and those who are connected to us in any way. Mutual respect and trust are important to us and guide us when choosing partners. Our Supplier Code of Conduct reinforces this commitment. The terms of our agreements with publishers stipulate that the magazines may not contain libellous, defamatory or unlawful material.

## **Privacy & data protection**

Readly respects and values the personal integrity of its customers and employees. We never collect, process or share personal data without valid legal basis, such as consent or a legitimate business interest. Readly informs our users about the processing of personal data through its privacy policy and of the use of cookies through its cookie policy. Any access to, or use of, personal data is strictly regulated. We ensure that all records of all personal data are updated and that we delete or anonymise personal data as soon as the purpose for the processing is fulfilled. Please refer to the Policy for Processing of Personal Data and the IT and Information Security Policy for further information.

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### Bribery

Giving something with the intention of influencing another person or to receive something in return in exchange for some kind of influence or action in return that the recipient would otherwise not offer, is considered a bribe. A bribe could be anything from money, a loan, gifts and favours, to entertainment and travels.

Where bribery involves any person in a government position, it is commonly referred to as corruption.

Bribery and corruption are unethical and unacceptable and not tolerated by Readly. We believe in integrity and fair dealing and comply with all laws, rules and regulations governing bribery and corruption in all the countries in which we do business. Every employee and every person associated with Readly should have a zero tolerance towards any kind of bribery or corruption.

Accepting gifts, entertainment, and other business courtesies from a business partner can easily create the appearance of a bribe or conflict of interest, especially if the value of the item is significant. Generally, acceptance of inexpensive "token" non-cash gifts is permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitations to attend local sporting events and celebratory meals with business partners can be appropriate aspects of many Readly business relationships, provided that they are not excessive and do not create the appearance of impropriety. Before accepting a gift or courtesy, consider carefully whether it feels right. If employees, or other persons covered by this Code of Conduct, are uncertain about what Readly considers as a bribe, the person shall turn to his or her closest manager.

### Conflict of Interest

A conflict of interest occurs when you - on behalf of Readly - give favours to relatives or friends in connection with any Readly business matters or if you as a Readly employee act in your own interest rather than our business interest. It could also arise if you are involved in external activities or investments that directly interfere with Readly interests and compromise your objectivity or your ability to make impartial business decisions.

Even if you may believe that it is not a conflict of interest, you should consider the potential appearance of conflict of interest and avoid putting yourself or Readly in a questionable situation. Recruitment processes are always conducted in a fair and non-discriminatory way. The search for new employees is based on the company's needs and employment will be based on a job description and the best match for the company. Readly will not favour relatives or friends in connection with recruitment processes.

# Q & A

## I have received tickets to a football game from one of our partners. Can I accept the tickets?

A bribe is an attempt to make someone do something by giving the person money, presents, or something else that they want. But it is sometimes hard to recognise the motivation behind a gift. First of all, there needs to be a clear relevance to Readly, it should include you as an employee and not privately together with your spouse during a weekend for instance. A football game has little to do with Readly and should not be accepted unless the whole team is invited and Readly covers our costs.

## I received an expensive gift from a business partner that I know I cannot accept. What should I do?

Return the gift to the business partner and politely explain our policy. If the gift is something perishable, like flowers or a food basket, where return is not really an option, place it in a break room where it can be enjoyed by everyone.

## My wife could be a potential supplier to Readly and has offered Readly her consultant services - what should I be aware of?

In order to avoid a conflict of interest you should inform your manager what relation you have to the supplier and ask to be excluded from the decision whether Readly will work with that supplier.

## I have been approached to sit on the Board of another company. Do I need to seek approval from someone at Readly prior to accepting this position?

Yes. You should inform your manager and contact the Legal department to review the situation and receive guidance on whether you can accept the position as your participation on other companies' Boards may cause a conflict.

### Competition laws

Readly values competition and respects its competitors. Competition keeps us on our toes and drives us towards continuous improvement. Most countries have laws – known as “antitrust,” “competition,” or “unfair competition” laws – designed to promote free and fair competition. Generally speaking, these laws prohibit 1) arrangements with competitors that restrain trade in some way, 2) abuse of intellectual property rights, and 3) use of market power to unfairly disadvantage competitors. Examples of actions that unlawfully restrict competition are sharing pricing information or marketing plans, exclusive dealing, price-fixing or agreements not to compete. Readly does not allow any kind of price collusion or abuse of market dominance. Readly strives to operate in countries where competition is free and fair. If Readly operates in markets with low levels of just competition, additional precaution will be taken to ensure fulfilment of this Code of Conduct.

### Taxes

Readly aims to be a strongly committed member of society. We always pay taxes and fees in compliance with applicable laws in the countries in which we operate. Readly submits honest and adequate tax declarations to tax authorities in all countries in which we operate.

### Speaking on behalf of Readly

We have to be extremely careful about protecting our brand and not disclosing confidential and proprietary

information. Consistent with this, you should also ensure your outside communications (including online and social media posts) do not disclose confidential proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of Readly unless you are authorised to do so. The same applies to communications with the press. Always check with the PR / Communications department before accepting any public speaking engagement on behalf of Readly.

### Minimising environmental impact

Readly is committed to minimising the environmental impact that our operations may have. We must continuously increase environmental awareness within Readly, and shall explore any positive environmental benefits of using Readly. We are a multi-site company which means that some travelling will always occur. All employees are encouraged to use digital meeting tools when possible, and when traveling is required, prioritise means of transportation with the least environmental impact.

Readly has made the decision to not allow any domestic flights in order to reduce emissions derived from business travel. Furthermore, air travel is not allowed between London and Paris. Employees are instead encouraged to go by train. First class tickets are allowed when booking any international travel by train that exceeds 5 hours of travel time.

# Q & A

## I have been contacted by the media to comment on a specific Readly matter. Can I speak to the reporter?

**No. Unless you are an official spokesperson for Readly, do not speak to the reporter. Politely ask the reporter to contact the PR Communications department.**

# Readly as a corporate citizen

Readly, as all businesses, has an impact on society and a role to play. Our aim is to play a large role in digitising the magazine industry and through this have a positive impact on society and create value for our stakeholders in many ways. Together we can truly be a force for good.

## **Provide responsible content and counter the spread of fake news**

Readly provides an offering in which there is a editor-in-chief behind all content on the platform who is responsible for the respective publications' operations, content and policies. Content on Readly must also be in compliance with the respective countries' laws and regulations, be relevant for our subscribers, and meet our ethical guidelines.

It is important for Readly that the content we provide through third-party publishers is relevant to our audience and in line with our ethical guidelines as laid out in our Code of Conduct and our Supplier Code of Conduct. Our content team vets all magazines manually before they are included in our platform.

## **Empower people to be educated, engaged and entertained**

Journalistic content empowers consumers to gain knowledge, to find inspiration and get engaged, to explore new interests, or quite simply to enjoy an entertaining moment. At Readly we can bring that positive force to people, connecting our subscribers with all the quality content we offer on our platform – magazines and newspapers from the respected and well-known publishers that we partner with. Through digitalisation we help our readers gain perspectives from both national and international sources.

## **Contribute to climate-friendly magazine and newspaper reading**

Through digitalisation Readly's goal is to increase the consumption of journalistic content with the lowest possible climate impact.

Our subscribers are clearly environmentally conscious. Our yearly surveys show that the choice of buying a Readly subscription is based partly on a desire to reduce one's environmental impact. Customers in all our markets have ranked the fact that Readly is a climate-friendly way of consuming magazines as one of the most important sustainability aspects. In our aspiration to encourage consumers to be aware and choose a sustainable lifestyle, we annually calculate and communicate the positive effects of reading digitally on our platform.

## Q & A

### **One of our strategic partners is asking me to fly to Amsterdam for a 1.5 h meeting, from an environmental perspective, is that OK?**

**That is something you need to evaluate yourself. If you can do the meeting through a video conference call, then that is what you should prioritize for the sake of the environment.**

### **Why on earth should I spend like 30 hours getting from Stockholm to London by train?**

**It is true that the average journey time by train between Stockholm Central and London is around 27 hours, with around 10 trains per day. We hope that as many colleagues as possible are interested in exploring that option for environmental reasons. The negative impact of the air travel between these two cities is about 500 kg of carbon emissions. The train ride generates about 5 kg.**

### **Is it really more sustainable to read digitally?**

**We have commissioned a study on the climate impact of reading digitally on Readly, which indicates a 87% emission cut compared to reading physical issues. There are indeed aspects of digital reading that have a negative climate impact, mainly related to production and manufacturing of the digital devices needed to read digitally. These perspectives, as well as impact from Readly's operations, have also been included in the study.**

# Readly as a listed Company

Since November 2023 Readly is listed at Nasdaq First North Growth Market. Being listed has many advantages - it provides us with the required capital to continue our expansion journey and deliver on our growth strategy, it will help build our brand even further and it will make future financing much easier through a broadened shareholder base.



## Considerations

### Information that may affect the share price

All stakeholders must be given the opportunity to trade the Readly share on equal terms, meaning that any information that is price sensitive to the share must be made available to all at the same time.

To allow for that, we must ensure confidentiality until such information is publicly disclosed. Our ambition is to always, without exception, comply with these principles and to be as transparent, open and proactive towards the investor community as possible.

As an Readly employee you can gain access to such "insider information", e.g. profit performance, contract alterations, entering into new agreements, acquisitions etc. You may not share such info with third parties. Further details are provided in the Information & Communication Policy.

### Insider trading

All Readly employees and consultants are required to observe the relevant capital market regulations. Anyone possessing information that would exert a significant effect on price if it became known is subject to the prohibition on insider trading. If you think that you may have access to insider information you should alert the CFO at Readly immediately. Further details are provided in the Insider Policy.

### Communication and Reporting

As a listed company Readly has a responsibility to communicate promptly, completely and accurately with all our shareholders and the general public. We ensure that financial and non-financial information are reported accurately and in a timely manner.

### Three important rules of thumb

#### Share with care!

Always be careful when sharing internal documents that contain financial info, aggregated data or any other information that might be sensitive.

#### Let the spokespeople talk!

Always refer questions regarding the Readly share and performance to any of our spokespeople (CEO or CFO). Only our spokespersons can speak on behalf of Readly externally.

#### Don't be shy to ask!

Rather ask once too much than too little.

Employees are responsible to gain understanding of our policies stated in Readly's Information Communication Policy and Insider Policy. Non-compliance may not only entail disciplinary sanctions, but also result in criminal charges.

