

Media House OÜ Code of Conduct

I Introduction

The Media House OÜ strives to conduct business in a responsible manner, based on the duty to respect human rights, labour rights, protect health, safety and the environment, prevent corruption and in general, apply sound business practices.

In order to make our position clear to our employees and workers who are not employees but whose work and/or workplace the Media House OÜ controls and Partners (contractual partners, suppliers, subcontractors etc), we have set up this Code of Conduct (hereinafter referred to as “CC”). This CC is based on international agreements: UN Universal Declaration of Human Rights, the International Labor Organization Conventions, the UN Convention against Corruption and the Rio Declaration on Environment and Development.

All our employees must follow our CC.

We will, when selecting Partners, in addition to other quality elements and commercial aspects, consider compliance with this CC. The CC outlines a minimum standard of conduct. We expect that our Partners always try to exercise good judgement, care and consideration by following both the requirements and the intentions of the CC. Furthermore, we expect our suppliers to be transparent and have an open dialogue with us about challenges which they encounter as part of their operations.

When this CC has been communicated to a specific supplier, it shall be regarded as a contract document and as an integral part of any contract entered into between us and the supplier in question.

In addition to adherence to this CC, we expect all suppliers to comply with applicable national and international laws and standards.

1. Social requirements

1.1 Human Rights

1.1.1 All employees, temporary or permanent, contracted by an employer, shall be treated with respect and dignity and be entitled to fundamental human rights. The employer shall make sure that all employees working directly or indirectly for them know and understand these rights.

1.1.2 The freedom of expression and the privacy of employees, customers and other stakeholders shall be especially respected.

- 1.1.3 Diversity shall be promoted. Discrimination is prohibited regardless of grounds and specifically on ethnicity, gender, sexual orientation, marital, social or parental status, religion, political grounds, nationality, disability, age or union affiliation.
- 1.1.4 No person shall be employed who is below the minimum legal age for employment. It is strictly forbidden for suppliers, sub-contractors and through temporary staffing agencies, to use children or minors under the minimum legal working age or fifteen (15) years old, whichever is higher, as labor. Employees under eighteen (18) years of age shall not work night shifts or carry out hazardous or heavy work. Adequate support shall be provided to enable such children to attend and complete compulsory education.

1.2 Labor Rights

- 1.2.1 All employees, temporary or permanent; contracted by a employer, shall have a written contract in a language understandable to them. The contract shall contain: working hours, overtime compensation, notice period, salary and frequency of payment and other obligatory information stipulated by national law.
- 1.2.2 Working hours and breaks shall comply with national laws and industry standards, whichever affords greater protection. It is recommended that working hours do not exceed 48 hours and overtime shall be voluntary and not exceed 12 hours per week, unless otherwise regulated in collective bargaining agreements or by national law. Employees shall be entitled to at least one day off in every seven-day period.
- 1.2.3 Pay and terms shall be fair and must meet basic needs, which could be equal to a minimum wage by national law, including allowances and benefits. Overtime shall be voluntary and limited, overtime pay rates shall be in accordance with national law and premium to regular wages.
- 1.2.4 The employees are informed about, and fully understand, their employment conditions and rights in their own language. Employees shall be encouraged to use grievance mechanisms, i.e. to be able to voice concerns without fear of punishment or retribution. The employer shall have grievance systems in place enabling anonymous reporting of unfair treatment and/or other complaints.
- 1.2.5 Working descriptions are established, updated and communicated to all employees. All employees shall have access to basic amenities such as drinking water, toilets and adequate rest facilities or dorms that are clean, safe and fit for purpose.
- 1.2.6 Any form of involuntary labor is strictly forbidden. Nor shall employees be required to lodge deposits or original identity papers or equivalent. Employees shall be allowed to move freely and have the possibility to leave the premises outside of working hours.
- 1.2.7 Employees shall be granted annual leave and sick leave, to which they are entitled according to national law, without any form of negative sanctions. In case of pregnancy, female workers shall be given maternity leave in accordance with the national law.

- 1.2.8 Nobody shall be subject to physical punishment, unlawful detentions, physical, sexual, psychological or verbal harassment or abuse. Deduction from wages as a disciplinary measure shall not be permitted.
- 1.2.9 There shall be no discrimination in hiring, compensation, access to training, promotion or termination of work based on ethnic background, religion, caste, age, disability, gender, marital status, pregnancy, sexual orientation, union membership or political affiliation. All workers with the same experience and qualifications should receive equal pay for equal works.
- 1.2.10 All employees shall be free to form and to join, or not to join, trade unions or similar employee representative organizations and to bargain collectively.

1.3 Health & Safety

- 1.3.1 The working environment shall have fair working conditions and be safe and healthy, including both physical and psychosocial health. Access to clean toilet facilities and to drinkable water and, if appropriate, sanitary facilities for food storage shall be provided.
- 1.3.2 Appropriate health and safety information and training shall be provided to employees including, but not limited to: fire safety, correct handling of chemicals and machinery, emergency preparedness and first aid. Such training shall be repeated on a regular basis.
- 1.3.3 Adequate steps to correct and prevent physical accidents and injuries as well as psychosocial illnesses shall be taken to limit built-in causes of hazards working environment. The Supplier shall provide appropriate personal protective equipment without any charge to the employee. Physical incidents and accidents as well as psychosocial illnesses shall be documented and reported to the employer's top management.

2. Anti-corruption requirements

- 2.1 All forms of corruption, including but not limited to extortion, bribery, facilitation payments, nepotism, fraud and money laundering, are strictly forbidden.
- 2.2 No one shall offer, ask for, give or accept, directly or indirectly, a personal payment, gift or benefit in exchange for favorable treatment intended to influence a business transaction or to obtain a personal or business advantage. This provision includes both families and employees of company, the supplier and its sub-contractors.
- 2.3 Always keep accurate and transparent financial records, as this helps ensure all payments are made for the right reasons.

- 2.4 Employees are strictly prohibited to receive or give any kinds of gifts during procurement processes and in relations with officials. It is also strictly forbidden for employees to be published in any advertising or promotional materials for Partner products or services.
- 2.5 Employees can only accept and give gifts on behalf of employee, if the gifts demonstrate a clear business objective, are appropriate for the nature of the business relationship and are of limited value. Events shall be directly related to business. All gifts will be registered and will be the property of employer. Hospitality, such as social events, meals or entertainments may be offered if there is a legitimate business purpose involved, and the cost is kept within reasonable limits. Hospitality, expenses or gifts shall not be offered or received in situations of contract bidding, negotiations or award.
- 2.6 Fair competition and open markets shall be respected and business decisions shall not be motivated or affected by personal relationships or interests. The Employer shall under no circumstance cause or be part of any breach of general or special competition regulations and laws, such as illegal cooperation on pricing or illegal market sharing.
- 2.7 A conflict of interest exists when financial or other personal incentives influence – or may appear to influence – an employee’s professional performance. Employees must not make personal gain from business transactions or non-public information obtained through our work. In addition, procurement decision processes must be fair and transparent.

3. Environmental requirements

- 3.1 The Employer shall reduce the negative impact on the environment affected by its operations. Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing pollution, promoting an efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas emissions in production and transport. The local environment at the production site shall not be exploited or degraded. Relevant discharge permits shall be obtained where required.
- 3.2 The Employer shall prioritize energy from renewable sources and limit water consumption, notably in distressed areas.
- 3.3 A monitoring process of emissions, effluents, pollutions and waste, including electronic waste, shall be established. All waste shall be properly managed or recycled in a traceable manner.
- 3.4 The Employer shall strive to reduce environmental impact from transportation by using road, sea or rail transport whenever possible. Fuel-efficient vehicles shall be prioritized when transporting goods and providing services to company.
- 3.5 The Employer shall evaluate any use of chemicals and substances on a regular basis and investigate whether it is possible to replace them with less hazardous alternatives. Chemicals shall be handled and disposed in a safe and correct way, making sure the

environmental negative consequences are minimized. The used chemicals shall be documented. By chemicals we mean chemical substances and products, e.g. oil, diesel, glue, lacquer, solvents, paints, dyes hardeners, stains, waxes, acids, additives etc

- 3.6 Innovative developments in products and services that offer environmental and social benefits, e.g. eco-design, are strongly encouraged.
- 3.7 In all actions the environmental impact and public health and safety should be taken into consideration.

4. Compliance requirements

- 4.1 This CC sets the standard expected to be met by all our Partners throughout the value chain. If the requirements in this CC are not met by a Partner, the parties will discuss corrective actions through an open dialogue. The Partner shall do its utmost to implement corrective actions as soon as possible, and it shall inform us about any such actions.
- 4.2 The CC shall be stipulated in the Partners' agreements and they shall, upon request, participate in a self-assessment process. If it is established that a Partner is unwilling or unable to carry out corrective actions which we find necessary in order to comply with this CC or the Partner has committed a substantial breach or repeated breaches of the requirements in this CC, we are entitled to terminate the business relationship and any contract(s) with the Partner. Such termination shall be effective from the time stated in a written termination notice from us.
- 4.3 The Partner shall periodically and systematically review how its own operations match the requirements of this CC.
- 4.4 We expect that the Partners continuously and systematically evaluate their compliance with this CC. We furthermore expect that improvement measures, whenever needed, are implemented by the Partners. We will also continuously evaluate and, if needed, improve our own policies and purchasing practices in order to facilitate the Partners compliance with this CC.

5. BOYCOTT OF AND SANCTIONS AGAINST CERTAIN COUNTRIES, INDUSTRIES AND/OR COMPANIES

- 5.1 We will avoid buying from a country when there is a broad international consensus to boycott the country, or when sanctions against the country have been implemented by the United Nations. We will avoid engaging with industries or companies when there is a broad consensus to boycott due to the negative social, environmental or ethical effects of the products, services or companies. We expect our Partners to implement a similar policy.

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Media House OÜ