

# Company Guidelines on Responsible Business Conduct

## 1. Ethical Business Practices

- **Commitment to Integrity:** We maintain the highest standards of integrity in all our business dealings, rejecting any form of corruption, bribery, or unethical behavior.
- **Compliance with Laws:** We comply with all applicable European and international laws, including anti-corruption regulations such as the EU Whistleblower Protection Directive.
- **Transparency:** All transactions and partnerships are conducted transparently, with accurate record-keeping and clear communication.

## 2. Environmental Sustainability

- **Sustainable Operations:** We strive to minimize our environmental footprint by reducing energy consumption, limiting waste, and adopting eco-friendly technologies.
- **Green Content Practices:** We prioritize digital solutions that reduce reliance on paper and other non-renewable resources.
- **Partnerships for Sustainability:** We collaborate with partners who share our commitment to environmental responsibility.

## 3. Data Privacy and Protection

- **Respect for Privacy:** We ensure that all client and audience data is handled securely and in compliance with the EU's General Data Protection Regulation (GDPR).
- **Ethical Marketing:** We deliver marketing campaigns that respect consumer rights and avoid manipulation, misinformation, or deceptive practices.

## 4. Implementation and Monitoring

- **Actionable Steps for Compliance:**
  - **Compliance Officer:** A designated officer or team is responsible for overseeing adherence to these guidelines.
  - **Regular Audits:** We will conduct regular internal audits to assess compliance with these guidelines, focusing on both anti-corruption measures and sustainability initiatives.
  - **Measurable Goals:** We set specific, measurable objectives, such as reducing carbon emissions by a certain percentage each year or conducting anti-corruption risk assessments.
  - **Performance Reviews:** Key performance indicators (KPIs) related to ethics and sustainability will be regularly tracked and reported.
- **Continuous Improvement:**
  - **Training Programs:** All employees will undergo training on anti-corruption practices and environmental sustainability.
  - **Feedback Mechanisms:** Employees and stakeholders are encouraged to provide feedback to improve our business conduct continually.

## 5. Communicating to Employees and Partners

- **Internal Communication:** These guidelines will be communicated clearly to all employees through onboarding materials, internal memos, and training sessions.
- **External Communication:** Partners and clients will be informed of our ethical business conduct and sustainability efforts through contracts, partnership agreements, and public-facing communications, such as our website or marketing materials.
- **Encouraging Ethical Conduct:** Employees and business partners are encouraged to report any unethical behavior or potential violations through secure, confidential channels. We ensure that all reports are taken seriously and addressed promptly.
- **Partnership Expectations:** We expect all partners and suppliers to align with our ethical business standards and environmental goals. Regular assessments will be conducted to ensure compliance.

## 6. Continuous Improvement

- **Training:** Regular training is provided to employees on anti-corruption practices and environmental sustainability.
- **Feedback Mechanisms:** We seek input from stakeholders to improve our practices continuously.
- **Monitoring and Reporting:** Our environmental and ethical performance is regularly reviewed and reported transparently.