SUSTAINABILITY REPORT

ECC CEDATECY

It is the second year that Ekspress Grupp publishes a separate ESG report as part of its annual report. The separate ESG report consolidates the financial report in the same volume as the annual report, and covers the operations of the parent group and all its subsidiaries as part of its annual report. The goal of publishing a separate ESG report is to gradually become compliant with the requirements of the EU Sustainability Reporting Directive and its reporting requirements. The application of the Directive will be mandatory for Ekspress Grupp from 2024 (in 2025 for the year 2024).

As before, the Group's sustainability activities and, in connection with it, the report are based on the ESG (environmental-social-governance) strategy created in 2022 (described on pages 3-5). We have organised and shortened the form of presentation as compared to what was published in the 2022 report, focusing primarily on Group-wide ambitions. The focus of the report is set on the important topics identified in the strategy creation. We measure and analyse our development in these areas with the help of the benchmarks directly related to the strategy (marked in italics), as well as with the benchmarks required in the standards established by the EU Sustainability Reporting Directive. We have collected more data on ESRS benchmarks this year than before, and we plan to add more data in 2024 to fully meet the requirements of the standard in 2025.

In assessing important focus topics, we have taken into account our supply chain and the view of our customers. For the most part, our policies, measures and targets only cover the activities of our companies and their impact on customers and endusers. The benchmarks also generally only contain information about our Group's own activities. Where we have included value chain data, it is highlighted separately with the relevant benchmark or policy description.

The numeric benchmarks presented in 2023 do not include data of AS Express Post. The home delivery business of Express Post was shut down as of 30 June 2023 and as a result of the closure of the business line, AS Express Post laid off approximately 450 employees.

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ESG STRATEGY

Ekspress Grupp is the leading media group in the Baltic States and therefore plays an important role in the development of the society. The Group's periodicals significantly shape the public information space in all its three home markets, i.e. Estonia, Latvia and Lithuania. As an employer of a considerable size, the Group has an obligation to manage all Group enterprises in an ethical and responsible manner, and to create independent, professional and reliable media content.

Ekspress Grupp has consistently been engaged in management of its social responsibility and impact. Expectations about the responsibility of the media sector have increased in recent years and global sustainability trends influence the operations of all Group companies on a daily basis. Consequently, in 2022 we drew up a Group-wide ESG strategy so that we can take a great leap forward in sustainability-related activities. The strategy forms the basis for the Group's goals and main operations which help to reach the goals at the Group and company level. With the ESG strategy, we try to meet the expectations of our interest groups and contribute to the achievement of the UN's sustainable development goals.

"Our first steps in implementing our ESG strategy – to successfully integrate sustainable practices into digital content creation and focus on responsible advertising – have been promising. In the coming years, we are going to deepen our commitment to ESG principles in all aspects of our business, with a particular focus on reducing environmental impact and enhancing sustainable practices in our supply chain."

Argo Rannamets, Ekspress Grupp CFO and member of the Management Board

As a Group, Ekspress Grupp is dedicated to ensuring that all group companies have a positive impact on people and the environment, contributing to the fulfilment of the UN Sustainable Development Goals.

We are actively seeking opportunities to create a positive impact on the society through the core activities of group companies. We adhere to the international principles of responsible enterprise (including UN Global Compact), OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights to ensure that our operations and business strategy do not infringe the rights or wellbeing of any stakeholder groups. In addition, we wish to reduce the impact of the Group's operations on the environment and to make our contribution to achieving the goal of alleviating the climate change according to Paris agreement.

Development process of the ESG strategy

The ESG strategy of Ekspress Grupp is based on the international standards of a responsible enterprise, EU sustainability regulations and the sector's best practices. When creating the strategy in 2022, in cooperation with external experts, we also mapped out important topics (materiality analysis). It does not yet fully comply with the European Financial Reporting Advisory Group (EFRAG) guidance on the use of the double materiality principle and the involvement of stakeholders necessary to comply with the Sustainability Reporting Standards (ESRS), but we plan to further improve our assessment based on the guidance. The ESG strategy of Ekspress Grupp is based on the international standards of a responsible enterprise, EU sustainability regulations and the sector's best practices.

In our materiality analysis made in 2022, we took into account the following aspects.

- Media Materiality 2022, mapping out important themes for the media sector published by the Responsible Media Forum (RFM) and based on the view of different stakeholder groups. This includes International ESG reporting frameworks, investor indices and mapping out key themes of the RFM members. In addition, the RFM conducted interviews with sustainability specialists of media companies, policymakers and representatives of non-governmental organisations.
- 2. **EU sustainability requirements.** As a listed company of a considerable size, Ekspress Grupp must comply with several EU sustainability regulations, in particular the Taxonomy Regulation and the Sustainable Reporting Directive. Looking ahead, the Group considers it important to comply with the directive on corporate sustainability due diligence and the directive on enhancing gender equality in the management boards of listed companies.
- **3. International standards of responsible enterprise.** As an international media company, Ekspress Grupp considers it important to adhere to the OECD Guidelines for Multinational Enterprises.

4. View of key managers of Ekspress Grupp. Members of the Management Board of Ekspress Grupp, CEOs of the key subsidiaries and editors-in-chief of media houses participated actively in defining the goals for the ESG strategy and in approving the course of action.

As a result of the analysis of significant themes we identified nine ESG focus themes. We consolidated these themes under three areas of social impact and responsibility and assigned priority levels to them. We have not yet assessed quantitative financial impact of these points of impact.

Area of social impact and responsibility	Focus themes	Level
	Independent and impactful media group	Fundamental importance
Leading ethical and responsible media group	Responsible advertising platform	Fundamental importance
	Subscribers' rights and wellbeing	Base level
	Personal and professional development of employees	Strategic importance
Responsible and attractive employer	Employee wellbeing	Strategic importance
	Equal treatment, diversity and engagement	Strategic importance
Responsibly and Reduction of environmental impact resources efficiency and climate impact		Strategic importance
sustainably managed company	Honest and responsible management	Base level
Company	Supply chain sustainability	Base level

The objective of dividing focus themes into different levels was to formulate our social impact by ESG themes and to understand which themes require more resources due to their bigger impact and strategic importance.

- Fundamentally important topics directly associated with our core activity and where our impact on the society is the largest;
- > Strategically important topics that have strategic importance for our direct and wider impact and in terms of our long-term success;
- **Base level** topics that require constant attention and development mainly from the point of view of efficiency and compliance with relevant requirements.

Brief overview of the ESG strategy

Focus theme	Commitment	Target for 2025			
	Leading ethical and responsible media group				
Independent and impactful media group	➤ The goal of Ekspress Grupp is to be the leading supporter of freedom of speech in the Baltics and to promote the society, providing access to fact-based and quality information.	 Publications of Ekspress Grupp do not publish unethical or irresponsible information. Zero violations of Ekspress Grupp's journalism code of ethics (in preparation). 			
Responsible advertising platform	Our goal is to be a well-known, trusted, ethical and responsible advertising platform for our customers and readers.	Zero cases where advertising or content marketing published on our platforms does not comply with our internal rules.			

Focus theme	Commitment	Target for 2025	
Subscribers' rights and wellbeing	We shall ensure the security and privacy of our users/customers/readers and make sure that our media content and services are accessible to all stakeholders.	 Zero violations of personal data protection requirements. Access is ensured to all media content, taking also into consideration the needs of people with special needs. 	
	Responsible and attractive employer		
Personal and professional development of employees	We are a leading employer in the media sector of all three Baltic countries. We facilitate and actively offer possibilities for personal and professional development. We support employees in adapting to the changing media landscape, in particular in the development of digital competence.	We have drawn up personal study and development plans for all our employees.	
Employee wellbeing	We provide a working environment that promotes employee health and wellbeing and where employees can fulfil themselves.	 We preserve high employee satisfaction level. Zero cases of work-related health damage. 	
Equal treatment, diversity and engagement	 Equal treatment, diversity and engagement are inherent to all companies and the organisational culture of Ekspress Grupp. 	 Zero percent wage gap between men and women. To reach compliance with the EU Directive on gender balance in business leadership. 	
	Responsibly and sustainably managed compa	ny	
Reduction of environmental impact: resources efficiency and climate impact	 We constantly reduce the climate impact of the organisation as well as services/products. We improve the resource efficiency of our activities and products. 	Digital companies of Ekspress Grupp reduce the climate impact across the value chain by 2030, in compliance with Paris agreement, and reach climate neutrality by 2050.	
Honest and responsible management	Honest and responsible management Group companies must be managed with integrity, lawfully and ethically.	 Zero cases of corruption or violation of business ethics related to Group companies or employees. 	
Supply chain sustainability	 We require that our suppliers comply with our sustainability ambitions and values, and follow the same ESG practices. When purchasing products and services we take into account the environmental impact when it is relevant and possible. 	All our main suppliers comply with ESG principles.	

ESG MANAGEMENT

In Ekspress Grupp, the responsibility for managing ESG issues lies with the member of the Management Board and CFO, Argo Rannamets, who has long-term ESG experience from the Ragn-Sells Group. In addition, we involve external experts in our work. The Group's subsidiaries have appointed persons responsible for ESG issues, who take care of both implementation of changes and reporting, and in larger subsidiaries, ESG management groups have also been set up.

"To meet all the requirements in our sustainability efforts, we constantly keep an eye on the developments in ESG, remain flexible and proactive and adapt our strategy according to needs."

Argo Rannamets, Ekspress Grupp CFO and Management Board member

At quarterly meetings of the Supervisory Board of subsidiaries, the person responsible for ESG issues in the subsidiary provides an overview of material ESG-related impacts, risks and opportunities, and the performance of policies, measures, benchmarks and objectives related to the impact, risks and opportunities. Once a quarter, also the Management Board of the Group presents the status of the ESG field to the Supervisory Board of the Group.

The remuneration of the members of administrative, management and supervisory bodies of Ekspress Grupp and its subsidiaries does not depend on the fulfilment of sustainability targets.

Composition of administrative, management and supervisory bodies of the parent company of Ekspress Grupp	2023
Number of members of the executive management (Management Board)	3
Number of non-executive members (Supervisory Board)	4
Average ratio of female and male members of the Management Board and the Supervisory Board	28.57%
The share of independent members of the Management Board and the Supervisory Board	28.57%
The proportion of variable remuneration dependent on the fulfilment of ESG goals	0%

An overview of the background, roles and responsibilities of administrative, management and supervisory bodies is presented in the Corporate Governance Report in 2023 annual report.

Risk management and internal control of sustainability reporting

In 2023, we implemented a Group-wide Risk Management Policy based on the requirements set by the Tallinn Stock Exchange, the Financial Supervision Authority and other regulatory bodies, generally accepted accounting standards and good practice, and the internal regulations and policies of the Group and its subsidiaries. Group-wide risk management includes the identification, measurement and control of risks, and we also use this policy when analysing sustainability-related risks. The internal control of sustainability reporting takes place through periodic reporting: subsidiaries provide the Group with an overview of their ESG activities, key performance indicators and provide an overview of bottlenecks. In 2024, we plan to start monitoring key performance indicators with a higher frequency than before and to improve the efficiency of data collection methods.

SOCIAL IMPACT

As a leading media group, Ekspress Grupp is well aware of its role in the economic and social development of all its home markets. Group companies have undeniably the biggest impact and possibility to contribute to the society and democracy through their core activities – by creating media content and offering modern digital solutions and services. To ensure that our positive contribution has as great an impact as possible, we conduct our activities in all media segments according to principles of corporate responsibility and sector standards.

Independent and impactful media

The role and responsibility of media is to bring relevant and challenging themes to the public. Coverage of social challenges turns attention to important processes that need to be changed so that they can be positively influenced thereafter.

With its ESG strategy, Ekspress Grupp assumes a Group-wide role and accountability for creating real changes to support sustainable development, especially UN Sustainable Development Goals. To contribute to the public, Ekspress Grupp's companies focus mainly on creating professional and trusted journalistic content, taking a leading position in the market in covering sustainability topics and contributing to the development of the media sector by public statements and through professional associations. The process of strategy creation and identification of points of impact has been described in more detail on pages 3-5.

ESG strategy			
Commitment	 The goal of Ekspress Grupp is to be the leading supporter of freedom of speech in the Baltics and to promote the society, providing access to fact-based and quality information. We want to contribute to the development of the media sector more broadly in order to maintain and promote the good level of press freedom in the Baltic States. Our ambition is to be a leading reporter of sustainability issues in the Baltics. 		
Target	Publications of Ekspress Grupp do not publish unethical or irresponsible information, i.e. Publications of Ekspress Grupp do not publish unethical or irresponsible information. Zero violations of Ekspress Grupp's journalism code of ethics (in preparation).		
Strategic activities	 We actively work to ensure that our journalistic content is independent, ethical and of high quality. We contribute to the development of media literacy and information literacy in cooperation with relevant interest stakeholders. We connect publications with socially important focus themes and create and develop media platforms focused on sustainability topics. 		

We adhere to the following principles of accountable journalism.

- Press ethics starts with independence. Journalism needs to be independent and free. The work of journalists and periodicals should not be influenced by business interests, political links, personal relations or gains, bribes or any other benefits. The principles of balanced journalism are followed in all group companies. Various parties are allowed to express themselves equally and they can present counterarguments and, if necessary, corrections. The sources of presented information are always verified. Each journalist is responsible for source and confidentiality protection. In case of sensitive topics, the line of ethics should be perceived.
- Standing up for credibility and freedom of expression. The continued and increasingly sharp polarisation of the public increases the pressure on media houses to create and present reliable and quality journalistic content in a timely manner.
- Comment control. Comments are an important part of online publications as they enable the readers to express their views on topics that are important to them. Ekspress Grupp's media publications promote comments by users who are registered and logged in. Inappropriate comments are removed by both human moderators and a machine-learning moderating system.

Overview of 2023: accountable journalism

We are developing a Group-wide journalism code of ethics, which we plan to complete in mid-2024. In preparing it, we take into account the views of our stakeholders, while ensuring consistency with the core values of ethical and independent journalism.

"Our journalistic content strictly adheres to traditional norms, focusing on unbiased reporting, fact-checking and editorial oversight."

Rasa Lukaitytė-Vnarauskienė, editor-in-chief of Delfi Lithuania

We hold ourselves to the highest standards for the content that we create and the ads that we sell, and our goal is to offer credible, informative and engaging content. We value the time and trust of our users and owners, which is why we adopted a Group-wide anti-clickbait policy in 2023. By establishing these guidelines, we ensure that we maintain ethics, empathy and respect, and strengthen the credibility, informativeness and engagement of our content. We believe in the power of responsible journalism and the ability to positively impact the lives of our readers.

"A click as such cannot be a value in itself. Our activities are based on the premise that the headlines are good and informative."

Martin Mets, CEO and editor-in-chief of Geenius Meedia

Benchmark	2022	2023	Target for 2025	
Number of articles in periodicals of Ekspress Grupp that violate the national journalism code of ethics.	1	6*	0	
Non-compliances with Ekspress Grupp's journalism code of ethics (in preparation).	-	-	0	

^{*} The Press Council made a disapproving decision regarding one article published in Eesti Ekspress, two articles published in Eesti Päevaleht, one article published in Kroonika and one article published in Rus. Delfi in Estonia. The Vilnius District Court found that the information in one article published in Lrytas was misleading.

"In adhering to journalistic ethics, we are advised by a lawyer with whom we discuss all questionable cases before publishing a story. We raise the awareness of the editorial Office by providing regular training, for example in 2023 we focused on the issue of personal data protection in the press."

Rasa Lukaitytė-Vnarauskienė, editor-in-chief of Delfi Lithuania

Artificial intelligence in Delfi Meedia

In 2022, "Prototype of a tool for measuring the balance of journalism", a project by Indrek Ibrus, professor of media innovation at the Baltic Film, Media and Arts Institute, Andres Karjus, a cultural data analysis researcher at the Institute of Humanities, and Mark Metsa, a junior researcher at the Institute of Humanities, won the contest of applied research and development works organised by the Tallinn University. The winning entry is an application study commissioned by AS Ekspress Grupp whose goal is to develop a new, machine learning-based method for measuring and evaluating the ideological bias in Estonian journalism.

A novel model implemented by artificial intelligence (AI) enables to enhance and automate the prototype so that the ideological stance of the media channel can be assessed on an ongoing basis according to specific subject areas. The project assured us that the method works, and it is possible to teach a machine to recognise text and rate it. This is a prototype, and work was continued in 2023 to find ways to further develop the innovative method and use it more widely to evaluate the content produced by the media group.

In addition, in 2023, the editorial office of Delfi Meedia developed the use of both textual and visual artificial intelligence, provided training to employees on this topic and adopted more systematic approach to the development of the opportunities offered by artificial intelligence. Artificial intelligence has not yet been integrated in everyday work.

Overview of 2023: significant topics in the media

ESTONIA

Before the general elections, Eesti Päevaleht published a journalistic investigation on how Russia has attempted to influence elections in Estonia.



- Eesti Ekspress published an in-depth article by freelance author Eero Epner on recent activities of the foundation Liberal Citizen in the context of elections.
- Katariina Libe, journalist of the magazine Pere ja Kodu, provided a comprehensive insight into how therapists without evidence-based training overload the healthcare system.
- Eesti Ekspress published an investigative article on the activities and background of Estonian and Ukrainian partners of Johanna-Maria Lehtme who is suspected of misuse of donations given to Slava Ukraini.



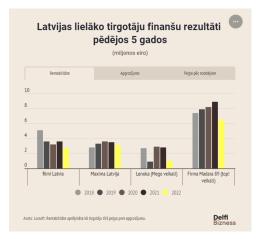
- In the Specialist series of articles, Eesti Päevaleht wrote about the challenges facing the Estonian healthcare system. The same problem was covered in detail also by Õhtuleht.
- Geenius Meedia wrote about the problems of employees of Eurora in leaving the bankrupt company.
- Ontule thighlighted the problems of people with special needs with the closure of the work-related support system.

LATVIA

Delfi Latvia published a story about the inappropriate behaviour of basketball couch Andris Stelmahs with his underaged student.



- Together with the Latvian public radio station Latvijas radio 1, Delfi journalists published a series of articles on sexual harassment in youth camps.
- In cooperation with the Baltic Centre for Investigative Journalism, Delfi Latvia published a series of articles on the pricing policy of grocery chains. Cost of living was also the focus in the series of analytical articles published by Delfi which also discussed housing conditions in Latvia's rural areas.



Delfi Latvia published a story about the death of a young woman and about her decision to donate her organs. After the publication of the article, the number of Latvians who signed up for organ donation went up notably.

LITHUANIA

Special correspondent of Delfi Lithuania, Dainius Sinkevičius, wrote a story on the criminal background of one of the most wellknown priests of the Vilnius Cathedral. The journalistic investigation that started from a petty theft exposed a priest who engaged in child pornography and sexual harassment. Moreover, during court proceedings it was found out that the prosecutor who was on the case had attempted to sexually abuse the same victim. Both the priest and the prosecutor resigned after the publication of the article. The same author has also exposed other cases of paedophilia. The public debate triggered by Delfi forced the courts to start disclosing full names of people charged of paedophilia also in closed trials.



Delfi Lithuania published investigative stories on the Lake Gulbinai development that exposed unauthorised activities of the Lithuanian business elite. After the publication of the article the prosecutor's office, the environmental agency and the state forest service started an investigation into the matter. Violations were identified and fines and correctional measures were imposed on offenders. After the interference of the Vilnius City Government, also access to the public lake and forest was restored.



The interview of ELTA with Lithuania's Minister of Foreign Affairs Gabrielius Landsbergis fuelled a broad-based political and social debate on the issues of national and international security.

Overview of 2023: sector development and media competence

As a leading media group, Ekspress Grupp has assumed the role of a spokesperson in the sector, contributing to its development. We actively support the development of media competence and fact-based knowledge.

The media publications of the Group are active partners of educational establishments in all three countries: Tartu University and Tallinn University in Estonia, Vilnius University and from 2023, also Vytautas Magnus University in Lithuania, Latvian University, Stockholm School of Economics, Riga Stradin University and Vidzeme University in Latvia. The goal of this partnership is first and foremost to improve the awareness of young people about career choices and possibilities in journalism. 81 trainees worked in Ekspress Grupp companies in 2023.

For expanding media competence and for introducing trends that shape the media sector, the leaders, managers, editors-inchief, journalists and specialists of other business units of our group companies often make presentations to different stakeholders. Editors and journalists of ELTA give lectures on journalism and media competence at Vilnius University, and journalists of Delfi Latvia train young people in the "Young Media Sharks" camp.

"This year, our employees were invited to speak at conferences as many as 40 times. In 2023, our employees also represented us 110 times at other events: at various international events, as experts in TV and radio programs, and in nationwide debates. We believe that the activity of our employees strengthens our reputation as a trusted company in the society and in the business environment of Lithuania."

Vytautas Benokraitis, CEO of Delfi Lithuania

For promoting media competence, Delfi Meedia organised in 2023 a project on youth and elections whose goal was to engage and educate the younger target group on issues of elections and the functioning of the society. The multi-year fact-checking project was also continued.



For the fourth year in a row, Delfi Latvia and the Baltic Centre for Media Excellence organised a joint training course #Storygram where experienced journalists taught upper secondary school students practical skills in journalism and multimedia. This project will be continued in 2024.



Delfi Latvia and the Baltic Centre for Media Excellence organised a joint project "Digitally Together" where young people assisted the elderly in issues like media and digital literacy.



Jointly with the Vytautas Magnus University, Delfi Lithuania founded in Lithuania the Baltic Research Foundation for Digital Excellence or DIGIRES that specialises in the detection, analysis, exposure and prevention of fake information in Lithuania and elsewhere.



- In 2024 ELTA plans to organise a project on media competence in cooperation with the Ukraine state-owned news agency Ukrinform.
- In 2024, Delfi Lithuania will organise in cooperation with the Baltic Media Centre of Excellence a hackathon on media competence

and training courses on fact-checking, in addition to training of schoolchildren on media competence.

In 2024, **Delfi Meedia** plans to increase the share of explanatory journalism in its coverage, i.e. in addition to presenting facts to place a bigger emphasis on creating context and background.

Overview of 2023: coverage of sustainable development

We have made it our mission to extensively cover the topics of sustainable development in the Baltic media. It is clear that the readers' interest in sustainability strongly depends on the profile of the somewhat different target groups of the periodicals and how the coverage echoes in the society at large. However, it seems to be a general trend that readers are more and more interested in topics related to the climate change, energy, forest and circular economy. In particular, our media companies are expected to address issues in the areas that most directly affect people in their everyday life. When covering sustainability topics, our subsidiaries follow the usual news criteria.

In 2020, Eesti Päevaleht was the first media outlet in Estonia to launch a climate section in 2020. In 2021, it was expanded into a more general **Green Portal**. In 2023, in addition to consistently covering topics such as car tax, nuclear energy and the climate crisis, an interview series "Kohepööre" ("Turn green now") was published during the general elections in which representatives of all major political parties presented their plans for mitigating environmental and climate problems. The current selection of topics has also increased the number of readers – while in 2022, the Green Portal had an average of 94 300 unique users per month, it increased to 129 259 in 2023.

"Since our product and topic portfolio is extensive, we try to find angles and topics related to sustainability everywhere.

This is how we handle topics and projects, and it is becoming a daily part in the validation of journalistic topics. A good example is sports and entertainment where we also covered the aspect of sustainability in 2023."

Urmo Soonvald, editor-in-chief of Delfi and Eesti Päevaleht

In addition, there is a portal dedicated to environmental issues in Geenius Meedia.

"We want to show the readers how sustainable activities benefit them, and how small things influence them and the environment in a positive way."

Martin Mets, CEO and editor-in-chief of Geenius Meedia

Grynas, a news portal devoted to environmental issues, has been operating under Delfi Lithuania continuously for ten years. In addition to this, environmental challenges covered within the special project **Tvari Lietuva**, based on the UN sustainable development goals where in addition to a continuous news stream, longer analytical articles on topics such as energy, consumer behaviour, education, gender equality, sustainable innovation and environmental protection are published once a month. In addition, video stories are made and brainstorming sessions are conducted to improve public environmental awareness. In 2024, Delfi plans to launch a podcast in the same portal.

In 2023, Delfi Latvia launched its green portal **Mēs darām**, and the Lithuanian publication Lrytas started the sustainability project **Tvarumo kodas**, mapping the journey of businesses towards sustainability both in text and in video, and also hoping to inspire others. The Lithuanian news agency ELTA has also created a separate section dedicated to sustainability.

In addition to the Green Portal of Eesti Päevaleht, Delfi Meedia's other periodicals have developed broader social focus topics, which have been in the focus of our biggest media brands.

- Delfi reduction of the number of traffic deaths
- **Eesti Ekspress** reduction of domestic violence
- **Eesti Naine** mental health
- Maaleht adding value to rural life

In 2023, Õhtuleht focused on reporting how the more vulnerable members of our society manage to cope, for example changes in the regulation of long-term protected work and the reasons why medical doctors are leaving Estonia. In 2023, Delfi Latvia shifted its focus to covering the problems of abuse, domestic violence, poverty, alcoholism and the rising cost of living.

"In 2023, we gave voice to many victims of abuse so that they could tell their stories. As a media outlet, we were able to create a safe and reliable place to tell one's story even when it was emotionally difficult."

Filips Lastovskis, editor-in-chief of Delfi Latvia

Delfi Lithuania focused on the topics of paedophilia and domestic violence. These topics were covered in printed press and documentaries. In addition, Delfi published a series of articles and made a six-part documentary about the life of refugees in Lithuania.

Overview of 2023: events and cooperation projects

We contribute more broadly to the development of the society through various cooperation projects. As a Group, we have expanded our business into event management, and also focus on sustainability issues, as part of our goal to be advocates for sustainable development issues.

The Group's media companies are members of various local and international organisations:

- Estonian Association of Media Companies (and through this, membership in News Media Europe)
- Internet Media Association
- International Fact-Checking Network (IFCN)
- Latvian Association of Journalists (Latvijas Žurnal asociācija)
- International News Media Association INMA
- The European Digital Media Observatory (EDMO)
- Network of investigative journalists, Baltic Engagement Centre for Combating Information Disorders (BECID)
- European Digital Journalism Network (EDJNet)

The periodicals also participate regularly in cooperation projects and are partners of the following organizations:

- Foundation for Exquisite Journalism (SA Oivaline Ajakirjandus)
- Network of investigative journalism OCCRP (Organized Crime and Corruption Reporting Project). Since 2023, Delfi Meedia is also an official member centre of OCCRP
- International Consortium of Investigative Journalists (ICIJ)
- Calouste Gulbenkian Foundation
- Recakcija, an association of investigative journalists in Lithuania
- The Baltic Centre for Investigative Journalism Re:Baltica
- Latvijas radio

Cooperation projects that deserve to be highlighted in 2023

ESTONIA

- In 2023, **Delfi Meedia** started cooperation with the Tartu University's Institute of Social Studies in the specialisation of journalism and communication (BA) as a result of which a new subject will be launched in 2024 on the development of digital media, communication processes in the media organisation, journalistic ethics and workshops on practical journalism. Journalists of Delfi Meedia will be mainly responsible for the mandatory topic of reporting.
- In 2023 Delfi Meedia organised the energy sector conference with a focus on green energy and cleaner environment. In 2024 the same event will focus in more detail on the future of the Estonian energy sector.



In 2023 **Geenius Meedia** led on two occasions a public debate group **Evening with Geenius**, where executives of start-up companies openly talked about their failures, mental health and the impact of business on private life. At least two events are planned to be held in the spring 2024.



LITHUANIA

➤ In 2022 and 2023, **Delfi Lithuania** organised a **sustainability conference** targeted at enterprises. This will continue in 2024. In the conferences, Lithuania and foreign experts shared their experience and knowledge in the integrated management of ESG, including the measuring of environmental impact and setting reduction targets. Most significant debates were broadcast also in Estonia and Latvia and were accessed by an estimated 87 000 persons per day of the broadcast.



Delfi Lithuania participated in a research project DIACONET which began in the summer 2023, is supported by the EU research and innovation framework programme "European Horizon" and whose cooperation partners are European universities and thinktanks. In the course of the project that will last until 2026, the partners will develop a framework to combine media accountability and civic accountability in digital communication with the purpose of fighting both the negative consequences of hate speech and distribution of fake information.

Donations to the community

In 2023, the subsidiaries of Ekspress Grupp supported various social initiatives, especially aiding Ukraine, but also school newsletters. The total amount of donations was EUR 624 523.

Responsible advertising

As a media group, our activities are not limited to journalistic content. Advertising sales on our media platforms and digital outdoor displays play a significant part in our commercial success. Therefore, we also have a responsibility to ensure that the marketing messages we deliver are aligned with our own values, and national and international marketing regulations. The process of strategy creation and identification of areas of influence is described in more detail on pages 3-5.

ESG strategy			
Commitment	> Our goal is to be recognised and trusted by our customers and readers as an ethical and responsible advertising platform.		
	We want to take a leading role in the Baltics in promoting the principles of responsible advertising in the media sector.		
Target	> Zero cases where advertising or content marketing displayed on our platforms breaches our internal rules (in preparation).		
Strategic activities	> We ensure that marketing messages delivered on our platforms comply with the law, are honest, sincere and truthful.		
	> We ensure a clear line between content marketing and journalistic content.		

[&]quot;It is essential for us to maintain open communication about the differences between journalistic and CM content and not let them merge."

Filips Lastovskis, editor-in-chief of Delfi Latvia

Overview of 2023: advertising sales, content marketing and outdoor advertising

In 2023, we thoroughly assessed the need to harmonise the rules of advertising and content marketing across the Group. We plan to adopt the principles of responsible advertising, which include guidelines on ethical advertising, transparency of marketing messages, and respect for consumer rights, by the end of 2024.

Advertising sales

All companies of Ekspress Grupp adhere to the obligations and restrictions arising from the law in advertising sales. For Ekspress Grupp, responsible use of data in advertising sales is part of our responsibility to our customers, as well as a business opportunity. In our teams, we approach all campaigns individually and actively communicate with our customers to ensure compliance with ethical principles. Following the trends of the advertising market, the question of how to approach behaviour-based advertising and what constitutes responsible advertising will become more important in the near future; how to avoid misuse of personal data that would be in conflict with either good practice or the law.

Content marketing

Content marketing continues to grow, setting requirements and restrictions for all media houses to ensure trustworthiness and transparency. The Group is convinced that the journalistic content must not be influenced by the interest of advertisers, content marketing or the organisation of the Group's own commercial events. The Group's periodicals have drawn a clear line between advertising and editorial work – these are different departments and employ different people.

Content marketing and other content shown for a fee such as special projects must be visually recognisable and labelled accordingly. This is also the expectation of our customers and readers.

"We have in place a strict policy that the relationship between the advertising team and the news department is like the relationship between the state and the church."

Filips Lastovskis, editor-in-chief of Delfi Latvia

Our media houses have internally agreed on content marketing rules that are updated from time to time. The media houses do not publish advertisements that are in conflict with their editorial standards or could challenge their independence and objectivity. Although collaboration with customers is open, the final decision to publish content marketing articles is always made by our content editors.

In order to provide the best service to our customers, we are constantly monitoring the ever-changing trends in content marketing. In 2023, Delfi Lithuania introduced multi-platform content in content marketing by turning TV programs and podcasts into text, audio and stories on social media, which allows addressing a wider audience. In 2003, new formats also appeared on the Delfi Meedia platform while interest towards content marketing podcasts increased. These developments prompted Delfi Meedia to formulate clearer guidelines for labelling such formats and the behaviour of journalists.

"Customers are interested in longer and more informative content marketing stories. It is no longer trendy to talk only about why your product is the best. A more comprehensive approach makes good business sense, offers more to readers and is an inspiration for better journalism."

Martin Mets, CEO and editor-in-chief of Geenius Meedia

Since Delfi Meedia also manages a ticket sales platform, in 2023 it focused on developing the practice and principles for covering, publishing and presenting content related to the events mediated in the sales portal, which will be agreed upon in 2024.

In connection with the Riigikogu elections held in 2023, Delfi Meedia saw a need to distinguish political content from other content marketing, labelled it as political advertising and used stricter fact-checking requirements than usual.

Benchmark	2022	2023	Target for 2025
Number of inconsistencies in content marketing rules	0*	0	0

^{*}The head of Delfi TV, Arturas Paknys, was cautioned by the Lithuanian Radio and Television Commission for a wrongly marked advertisement on the TV show. No punishment was imposed on Delfi Lithuania.

Digital outdoor advertising

Part of the social responsibility of our digital outdoor advertising companies (Linna Ekraanid OÜ and D Screens SIA) is related to light pollution from advertising screens, which can affect both city residents and road users. Companies take into account the requirements arising from the law and the agreements of a good outdoor advertising practice; in the case of the latter, cooperation is carried out with national associations of advertising and outdoor media companies. For example, screen brightness is adjusted according to the time of day, and animations are limited to help avoid excessive light noise. Also the restrictions of the Transport Authority to ensure road safety are observed in outdoor advertising.

Customers and consumers

Our services and service development follow a consumer-centric approach, and our subsidiaries have designed their customer communication processes according to their line of business – our group companies have both private and business customers, and as a media group, we also serve the wider public. Group companies manage large customer databases, and as an increasingly complex digital media group, recognise risks related to data protection.

In creating our ESG strategy and continuously improving our business model, we have taken into account the interests, views and rights of our customers, about which we receive regular feedback from customer surveys. Our customers have different interests – in addition to daily news stories, readers wish to know more about different areas of life: sports, culture and environmental issues. In addition, all media content must be available to each customer in the channel and format of their choice.

The process of strategy creation and identification of areas of influence is described in more detail on pages 3-5.

ESG strategy			
Commitment	> We shall ensure the security and privacy of our users, customers and readers and make sure that our media content and services are accessible to all stakeholders.		
Target	 Zero violations of personal data protection requirements. Access is ensured to all our media content, taking also into consideration the needs of people with special needs. 		
Strategic activities	 We ensure the protection and privacy of subscribers' and customers' data, and use data in accordance with the law. We ensure the protection of the rights and well-being of readers/subscribers. We develop the availability of media content on all platforms. 		

In 2023, we set initial guidelines for the customer experience policy across the Group and will update them throughout 2024 based on feedback from subsidiaries and industry trends. We plan to adopt the policy by the end of the year.

Overview of 2023: customer experience and satisfaction

For Ekspress Grupp, it is important to ensure the satisfaction of the customers of Group companies, match the offered services with customer expectations and needs, and exactly fulfil the promises made to the customer. The fulfilment of this promise is the responsibility of the Management Board of Ekspress Grupp.

Our subsidiaries manage the entire chain of creating a complete customer experience, which includes content creation, print quality, channel availability, and customer service. Feedback is collected by all companies in direct contact with the customer in order to offer products/services that meet customers' requirements and expectations in the future.

We monitor customer satisfaction in the following categories:

- **Content.** Delfi Meedia, Delfi Latvia, Õhtuleht and Geenius Meedia monitor customer satisfaction with all paid content. Other media companies of the Group also regularly organize reader surveys.
- Service. Delfi Meedia is the company with the largest number of publications in the Group that comes into contact with customers at different stages and collects feedback on the content of publications as well as subscriptions, service process, technical side of the digital environment and home delivery of paper publications. Customer service measures customer satisfaction on a daily basis, and customers are invited to provide feedback on how their problem was handled.
- Advertisers. The communication of outdoor advertising companies with advertisers is more personal, and feedback is requested at random, in direct communication with the customer. In 2023, a pilot project for the use of the NPS (Net Promoter Score) survey was carried out in Delfi Latvia, as a result of which it was found that the preparation of the survey sample needed improvement. Other media companies do not use classic NPS surveys.
- Product development. Delfi Meedia organises surveys on product development.

Brand credibility. In cooperation with Kantar, the Group measures the trustworthiness and recognition of the Delfi media brand. According to the latest surveys, Delfi Latvia is Latvia's most trustworthy media brand.

Customer satisfaction with media companies

In 2023, Delfi Meedia and Geenius Meedia measured the customer satisfaction of registered users. Delfi Meedia used a random sample, 25 379 people responded to the survey, and the customer satisfaction indicator was 81.88%. Geenius Meedia published a survey on its web portal which was answered by 531 readers and the customer satisfaction rate was 95.6%.

Customer complaints and remediation

Customer complaints are handled personally in the customer service departments of group companies and on a case-by-case basis, and there is no separate procedure for this across the Group. Phone and email contacts of all subsidiaries are published on their website. Since the sales revenue of our companies directly depends on the availability of the service, we fix the errors as soon as possible. In advertising, errors are compensated within the campaign period.

"We always compensate our customers in case of our incompliance. Customers can contact us directly and with ease."

Mihkel Luks, CEO of Linna Ekraanid

Overview of 2023: customer rights and wellbeing

In the case of media content, our main goal is to support openness and participatory democracy and to deal with topics of significant social impact. At the same time, our media outlets are responsible for ensuring that the public information space is designed responsibly and that content that may harm the physical or mental health of readers is either prohibited or displayed with certain restrictions. In the case of advertising content restrictions, we adhere to the advertising laws of Estonia, Latvia and Lithuania.

The customer base of our media companies is mainly divided into three groups: regular readers, registered readers and business customers. Advertising companies operate primarily on a business-to-business model. We have increased the involvement of various stakeholder groups in the information space by creating customer-friendly and attractive digital solutions. Availability, which also takes into account the requirements of people with special needs, is also important for the involvement of all interest groups. We ensure availability of our services in three ways.

- 1. Digital solutions: we facilitate the availability of services by creating innovative digital solutions.
- Public news blogs: We ensure that critically important content is available to everyone, including nonsubscribers.
- 3. Availability measures: The Group's goal is to increase the proportion of content covered by various availability measures on our media platforms in order to involve as large part of the society as possible in the information space.

In 2023, our media companies increased their share of audio content as an alternative to written articles, and this functionality is planned to be improved and expanded in 2024.

The vast majority of our media companies that also produce video content have also provided it with subtitles. In 2023, Delfi Latvia made great progress in this field.

Delfi Meedia and Delfi Latvia enhanced the technical solution of their portals, which, thanks to the improvement of the download speed, makes it easier and more convenient to read the news on all devices. The solution also created more options for personalising the user experience, including the option to change the text size. Delfi Lithuania is also planning to switch to the new platform.

Benchmark	2022	2023	Target for 2025
Percentage of content covered with availability measures from total media contact*	70-90%	80-100%	100%

^{*} All media publications of Ekspress Grupp have not evaluated the share of content covered by availability measures. The range describes the percentage of available content of Delfi in Estonia, Latvia and Lithuania.

Overview of 2023: data protection

In the global advertising market, compliance with data protection rules has become very important. We actively monitor market trends and change of regulations in order to assess emerging trends in this sector. We have compiled the principles and processes for the secure collection, storage and processing of customer data and protection against malicious attacks, which are implemented by all group companies. Data protection conditions can be found on the website of each company.

All aspects related to data protection are important and the Group makes sure that it complies with all related laws and regulations. We conduct data protection audits of our subsidiaries and thereby support the implementation of principles and procedures at the company level.

In September 2023, we also adopted a group-wide security policy, with which we established uniform principles of conduct to ensure comprehensive protection of people, hardware and software, important infrastructure and information, and processed data. All employees, contractors and third parties who have access to our systems and data must comply with the policy. In addition to the group companies, the policy also applies to all investees that are not part of Ekspress Grupp, but that are controlled by the Group within the limits established by law.

"In 2023, we added additional security layers to our online publication and made investments to secure our service against cyber attacks."

Erik Heinsaar, CEO of Õhtuleht Kirjastus AS

In cooperation with external consultants, Delfi Meedia updated its data protection conditions in 2023, which can be found on its website. In addition, data protection terms and conditions to be used for recruitment were created.

Benchmark	2022	2023	Target for 2025
Inconsistencies in personal data protection rules	0	0	0
Number of fines for cases of personal data protection violations	0	0	0
Total amount of fines related to the violation of personal data protection	0	0	0

Employees

Ekspress Grupp has over 1100 employees whose dedication at work helps to fulfil the Group's mission and goals. Quality tools, a flexible work organisation and a supporting team are an important part of creating a motivating work environment.

Retaining and developing current employees as well as training and supporting the next generation are important to us. We need professional and motivated employees both now and in the future. Recruiting the best in the labour market starts with the satisfaction of current employees. This, in turn, depends on the salary, but also on the open and inclusive organisational culture, development opportunities and the comfortable working environment we offer to employees. That is why we contribute to creating a motivating work environment and invest in our employees.

All Group companies employ people with different mother tongue and cultural background. We are tolerant and treat all our employees equally and with integrity. Discrimination of employees on the basis of gender, race, mother tongue, political beliefs, age or any other aspect is prohibited.

We consider it important that our employees are satisfied and healthy, and we provide benefits and subsidies to our employees for health promotion and family events. If desired, we provide flexible working hours. Employees are often invited to attend summer days and other joint events together with their families, because family members play an important role in every employee's life.

"We already decided years ago that when hiring new people, we must be willing to spend more time and energy for finding the right professional."

Urmo Soonvald, editor-in-chief of Delfi and Eesti Päevaleht

The focus of the Group's HR area is mainly influenced by digitization, creating synergy with new business areas (real estate and ticket sales portal, organizing events) and continuing to make internal processes more efficient.

The process of strategy creation and identification of areas of influence is described in more detail on pages 3-5.

	ESG strategy: personal and professional development of employees
Commitment	 We are a leading employer in the media sector in all three Baltic States. We create conditions and actively offer opportunities for personal and professional development. We support employees in adapting to the changing media landscape, especially in developing digital competence.
Target	> Personal learning and development plans are drawn up for all employees.
Strategic activities	 We create a group-wide leadership development programme. We create employee development programs/talent academies in all subsidiaries.

ESG strategy: health and wellbeing				
Commitment	We ensure a working environment that supports the health and well-being of employees, where employees can fulfil themselves.			
Target	 We maintain a high score for employee satisfaction (eNPS). Zero occupational health damage cases. 			
Strategic activities	 We continuously improve/enhance employee well-being and satisfaction. We ensure a healthy and safe working environment, taking into account both physical and mental health and well-being. We enable and promote work-life balance. 			

ESG strategy: diversity and engagement					
Commitment	Commitment Equal treatment, diversity and engagement characterise all companies and organisational culture of Ekspress Grupp.				
Target	 Ekspress Grupp has no gender wage gap. To achieve compliance with the European Unio directive on gender balance in business leadership. 				
Strategic activities	 We recruit and retain diverse talent. We engage employees and ensure an open orga We guarantee everyone equal opportunities for We pay employees equal, competitive and dece 	career development within the company.			

Overview of 2023: employee characteristics

Equal and fair treatment of all employees is important for us – all Ekspress Grupp companies maintain zero tolerance against discrimination based on gender, race, language, political views, age or other minority characteristics.

"Our goal is to make sure that every employee feels good in our company and that everyone's expectations are met."

Rasa Lukaitytė-Vnarauskienė, editor-in-chief of Delfi Lithuania

In the context of recruitment, we strictly follow the principles of equal treatment. To promote equal treatment and inclusion, all Ekspress Grupp companies ensure the most flexible working conditions and a working environment that is open and supports diversity.

In 2022, some media companies of the Group hired journalists from Ukraine, Belarus and Russia who had fled their homeland due to the war in Ukraine. Many journalists employed at that time became permanent employees in 2023.

"The contribution of Ukrainian and Russian journalists hired in 2022 has been significant, contributing to the growth and success of Delfi TV and related platforms. We achieved good synergy between our Lithuanian- and Russian-language editorial offices by translating the texts and videos of our colleagues in the Russian edition. This also led to new subscriptions."

Rasa Lukaitytė-Vnarauskienė, editor-in-chief of Delfi Lithuania

While in 2022, a lot of resources were spent on obtaining work and residence permits for foreign journalists, in 2023 we have been able to focus more on providing professional value.

"It is clear that these journalists will not be able to return to their homeland as long as the Putin regime remains entrenched. In this light, it is important that the Estonian state allows independent journalists from Russia and Belarus to work in Estonian editorial offices as undisturbed as possible, which helps to expose the real face of the regime that rules their societies."

Tarmo Paju, managing editor of Delfi Estonia

	Estonia		Latvia		Lithuania		
	М	F	М	F	М	F	
Employees under 30	61	85	15	13	22	65	
Percentage of employees under 30	21.5%		20	0%	29.	8%	
Employees aged 30-49	152	232	39	64	78	101	
Percentage of employees aged 30-49	56	.7%	73.	6%	61.	51.3%	
Employees over 50	50	98	2	7	12	14	
Percentage of employees over 50	21	.8%	6.4	4%	6 8.9%		
Number of permanent employees	262	412	56	83	112	177	
Number of temporary employees	1	3	0	1	0	3	
Non-salaried employees who provide their labour to the Group						24	
Persons whose labour is provided by entrepreneurs whose main activity is labelled as "employment activity"						1	
Number of employees with disabilities						13	
Percentage of employees with disabilities subject to data collection restrictions						1.17%	
Number of trainees						81	

Overview of 2023: satisfaction, equal treatment, diversity and engagement

Our companies mostly work in small teams, allowing managers to easily monitor and improve the microclimate. We value an open work culture and discussion, and managers hold regular one-on-one conversations with employees. Human resources departments of companies solve issues that need wider attention.

"We have built our company's management culture in such a way that we encourage all employees to ask questions and get in touch on any topic. We listen to everyone and discuss major issues at the management level."

Erik Heinsaar, CEO of Õhtuleht Kirjastus AS

Over the years, we have conducted salary surveys to ensure that our salary system is fair and competitive in the market. For example, Delfi Meedia participates in the Fontes salary survey. Delfi Lithuania and Delfi Latvia as well as D Screens take part in the salary survey of Figure Baltic Advisory. In several group companies, a performance pay system has been established depending on the position, and salaries are regularly reviewed together with the employees. There are no employees covered by a collective agreement in our Group or subsidiaries.

"We have agreed on a clear salary vision with many employees, where the employees have specific goals which, if achieved, will raise them to the next salary level."

Martin Mets, CEO and editor-in-chief of Geenius Meedia

Benchmark	2022	2023	Target for 2025
Gender equality	and wage gap		
Difference of average gross hourly wages of men and women (ratio of wages of male employees) (unadjusted wage gap)	79%*	80.64%	100% (0% wage gap)
Percentage of employees in management position	-	4.78%	-
Percentage of women in management position	31%	35.85%	-
Satisfaction	with work		
Voluntary labour turnover	10%	13.57%	-
Total labour turnover a) number b) percentage	-	a) 199 b) 17.88%	-
Number of pending work disputes	1	0	-
Employer's Net Promoter Score (eNPS)	_**	_**	-
Cases of discrimination	on and complaints		
Number of cases of discrimination***	0	0	0
Number of complaints reported through the Group-wide anonymous channel	-	0	-
Number of complaints submitted to the OECD national contact points of Multinational Enterprises	-	0	-
Total amount of fines, penalties and damages resulting from discrimination cases and complaints	-	0	-
Number of serious cases of human rights violations	-	0	-
of which cases that violate the OECD Guidelines for Multinational Enterprises and/or the UN Guiding Principles on Business and Human Rights	-	0	-
Total amount of fines, penalties and damages related to cases of serious human rights violations	-	0	-

^{*2022} metric has been restated.

"In 2023, we trained our employees on the topics of harassment, discrimination and bullying at work in order to improve the awareness of our employees and to help recognise such cases at work."

Mailis Neppo, head of ESG at Delfi Meedia

Overview of 2023: professional and personal development

In 2023, we initiated an employee development programme, focusing on media-specific skills and management training. In the coming years, we plan to expand these programmes to cover a wider range of skills and make the development programme available to a larger number of employees in all our subsidiaries.

Our subsidiaries offer employees more and more opportunities to take part in both professional and general educational training outside of the development programme. The content of the trainings is in accordance with the specificities of the positions. In 2023, companies organised trainings in the fields of journalism ethics, artificial intelligence (AI), management, information security, data processing and public speaking, among others. In 2024, our subsidiaries plan to train their employees on, among other things, ethical advertising practices and industry standards and data protection issues.

^{**} In 2022 and in 2023, the Employer's Net Promoter Score (eNPS) was not assessed in all companies of Ekspress Grupp. During the implementation phase of the ESG strategy, we plan to standardise the methodology for assessing employee satisfaction and collect regular feedback on the working environment. The eNPS was assessed by Delfi Meedia in 2022 (eNPS: 37). In 2023, the eNPS was assessed by Digital Matter Lithuania (eNPS: 48), Delfi Meedia (eNPS: 31), Delfi Lithuania (eNPS: 51), Delfi Latvia (eNPS: 34.5), Geenius Meedia (eNPS: 79), Õhtuleht Kirjastus (eNPS: 80).

^{***}The number of cases officially registered in the company or initiated by the relevant authority.

"Employees often express their own initiative to receive training, for example, to improve journalistic or IT skills. Organising such trainings and discussions helps employees to be better informed about the market situation and prevailing trends."

Tautvydas Mikalajūnas, CEO and editor-in-chief of Lrytas

In the interests of general education, as well as to support industry-specific journalism, group companies have educated their employees in 2023 on topics such as investment and mental health.

"We have also organised trainings not directly related to work, for example in the field of psychology and sports, in order to maintain and improve the team's sense of togetherness."

Mihkel Luks, CEO of Linna Ekraanid

Lrytas has created an internal information sharing environment where employees can share new knowledge, advice and learning materials related to digital skills with each other.

In addition, the Hans H. Luik training scholarship is intended to increase the development opportunities of employees, with the help of which employees can complete additional training that is not directly related to their field of work. Scholarships are awarded three times a year, and to a large extent the scholarship is used to study new fields, as well as to visit professional foreign conferences.

Employees who received a scholarship in 2023 by company:

>	Delfi Meedia AS	8
>	Delfi AS	18
>	Delfi UAB	14
>	Õhtuleht Kirjastus AS	7
>	Lrytas UAB	4
>	Digital Matter UAB	3

Our subsidiaries also aim to hold regular development discussions with all employees in order to share constructive feedback on work results and encourage continuous development.

"In 2022, we created the possibility to take a one-month creative leave once every five years, during which half of the salary is retained. From the point of view of time off, the effects of creative leave have been clearly positive, it has allowed employees to do things that are not possible outside of work. At the same time, such a number of creative holidays has not overly affected the work processes of the editorial office."

Urmo Soonvald, editor-in-chief of Delfi and Eesti Päevaleht

Benchmark	2022	2023	Target for 2025
Average number of training hours per employee	-	6.7	-

Overview of 2023: health and wellbeing

Our group companies offer a variety of benefits to support the well-being of their employees. Many companies offer a sports benefit, additional health insurance and the possibility to anonymously contact a psychologist either in-house or through external partners.

"Although we have been using hybrid work in our companies for several years, the year 2023 brought new challenges in improving employee safety. We focused on updating our safety approach to better meet the changing needs of the hybrid workforce and continued to provide resources to support both physical and mental health in remote work environments."

Argo Rannamets, CFO and member of the Management Board of Ekspress Grupp

Accidents at work and attacks against journalists

Based on the nature of the business activities of the companies of the Group, the possibility of occupational accidents is small. In order to prevent accidents at work, we follow a uniform approach to safety, the laws of Estonia, Latvia and Lithuania and conduct regular safety training sessions. In the event of an accident, we have a comprehensive response plan that includes immediate medical care, investigation and follow-up measures to prevent the accident from happening again. In 2023, Delfi Meedia updated the risk analysis of the working environment, based on which it plans to create ergonomic workplaces in 2024.

In addition to accidents at work, media companies must also consider the possibility of attacks against journalists. In 2023, no Ekspress Grupp journalist was physically attacked (two attacks took place in 2022), but one crime against property was committed, which can be attributed to the victim's journalistic activities. The police are investigating the incident.

During the year, the journalists of Delfi Latvia experienced aggressive verbal attacks in the online environment, in one case the police were contacted to resolve the situation and the case is still under investigation. Geenius Meedia, Õhtuleht Kirjastus and Delfi Meedia have jointly appealed to the court to resolve a verbal attack, the procedure is ongoing.

"In general, the threat to the health and well-being of journalists has continuously increased both in Estonia and elsewhere in the Western world due to the polarisation of societies, war and coercion activities. This concerns an overall increase in verbal threats and insults both directly and in public spaces, including social media or comment forums. Our policy is unequivocal - every threat must be reported to the police as soon as possible."

Tarmo Paju, managing editor of Delfi Estonia

Editorial offices perceive as a growing threat the rise in the number of complaints attempting to silence journalists, which are often filed against journalists, hinder the operational work of the editorial offices and affect the financial status of companies. Delfi Meedia also bears all costs in personal court proceedings. Given the rapidly growing role of Delfi Meedia in actively exposing the activities of the criminal regimes of Russia and Belarus, in addition to the threat of physical attacks, more attention must also be paid to cyber attacks, including doxing, which can endanger the sensitive data of both companies and journalists. The company's management is looking for solutions to mitigate the problem.

Benchmark	2022	2023	Target for 2025			
Employee health and safety						
Working days lost due to work accidents, work-related health						
disorder and other health disorders						
a) number	a) 130	a) 0				
b) percentage	<i>b)</i> -	b) 0%	0			
Working days absent from work						
a) number	a) 8627	a) 5234				
b) percentage	b) -	b) 1.88%	-			
Number of occupational accidents						
a) number	a) 8*	a) 0				
b) percentage	b) -	b) 0%	0			

Benchmark	2022	2023	Target for 2025
Number of work-related illnesses	0	6	0
Number of fatal occupational accidents	0	0	0
Number of attacks against journalists	2	2	0
Wor	k-life balance		
Percentage of employees who took a leave for family reasons			
a) men	a) -	a) 10.32%	
b) women	<i>b)</i> -	b)10.07%	-
c) total	c) 11%	c) 20.38%	
Percentage of employees on parental leave who			
a) returned to work M/F	a) 49%	a) 83.33%/33.33%	-
b) worked in the company after a year M/F	b) 71%	b) 83.33%/83.33%	

^{*} Work accidents in different companies were related to falls, and in one case a dog attacked an Express Post employee who was delivering a paper.

ENVIRONMENTAL IMPACT

Resources efficiency and climate impact

Although the environmental impact of the media sector is rather small, climate and environmental impact management is inevitable for a sustainable and responsible company. We have mapped our important areas of influence in the environmental field during the creation of the ESG strategy, also taking into account our supply chain, because we can largely control our environmental impact through our supply chain. The process of strategy creation and identification of areas of influence is described in more detail on pages 3-5.

The environmental impact of Ekspress Grupp is primarily related to printing - our companies publish newspapers, magazines and books. But in the case of the online format, it is also important to monitor which energy sources are used in the operation of the infrastructure necessary to maintain production and online platforms, and what is the environmental impact of the energy consumption of the devices of digital media consumers. In the case of a paper newspaper or magazine, a positive contribution is made if the reader shares it with family members or colleagues and later recycles it as waste paper.

We have already largely stopped issuing invoices on paper, we have minimised the quantity of printed marketing materials, and our subsidiaries mostly use reusable props when organizing events.

ESG strategy					
	In our own activity	 We consistently reduce the climate impact of both the organisation and services/products. We improve the resource efficiency of our operations and products. 			
Commitment	In supply chain	 We require that our suppliers are aligned with our sustainability ambitions and values and follow industry-specific ESG practices. We take into account the environmental impact when purchasing products and services, if it is relevant and possible. 			
Target	In our own activity	Ekspress Grupp's digital companies reduce the climate impact across value chains in accordance with the Paris Agreement by 2030 and achieve climate neutrality by 2050.			
	In supply chain	All our main suppliers observe ESG principles specific to our sector.			
Strategic activities	In our own activity	 We establish an environmental management and reporting system across the Group. We improve resource efficiency and reduce the direct climate impact of all companies We consistently reduce the impact intensity of digital products. We consistently reduce the environmental impact of printed publications. 			
	In supply chain	 We engage high-risk suppliers in meeting our sustainability commitments. We prefer environmentally friendly products and services. 			

The development of the Group-wide environmental management and reporting system is currently in the early stages. We expect it to be fully operational by the end of 2024, with a centralised data collection system and regular environmental performance reviews.

Overview of 2023: climate change

Climate-related considerations are not taken into account in the remuneration of administrative, management and supervisory bodies of Ekspress Grupp or its subsidiaries. You can read more about the principles of remuneration of administrative, management and supervisory bodies in the Corporate Governance Report in 2023 annual report.

In 2023, we initiated a preliminary assessment of climate risks across the Group. When the assessment is complete, we plan to take the risk assessment into account when developing a transition plan for mitigating climate change in line with

the goals of the Paris Agreement and a general climate policy, which we want to introduce across the Group by the end of 2024. In doing so, we intend to constantly test and improve the initial frameworks of the transition plan and climate policy.

Steps towards smarter energy consumption

Õhtuleht Kirjastus and Delfi Meedia have already started to take steps to reduce their climate impact by managing energy consumption, and in 2023 equipped the lights of office premises with motion sensors. Almost half of our subsidiaries already use motion sensors, either partially or completely. Also, Õhtuleht Kirjastus and Delfi Meedia media companies have started to more consciously manage the operation of their cooling, heating and ventilation equipment.

In addition, remote work opportunities are actively used in all our subsidiaries.

In 2023, Lrytas in Lithuania moved into a new office building with the energy class A and is certified according to the most rigorous level, i.e. LEED Platinum. In addition to the energy efficiency of buildings, LEED certification takes into account the sustainability of the construction site, the efficiency of water use, the use of materials and resources, and the quality of the indoor environment. Delfi Latvia is preparing to move into an office building that has BREEAM certificate.

Benchmarks for energy consumption and climate impact

As our subsidiaries are at different phases in implementing the ESG strategy, we did not fully assess the Group's energy consumption or climate impact in 2023. We included the impact of Ekspress Grupp's activities and the impact of the following subsidiaries in the presentation of energy consumption data and climate impact calculations: Delfi Meedia AS, Geenius Meedia OÜ, Linna Ekraanid OÜ, Biļešu Paradīze SIA, D Screens SIA, Delfi AS (Latvia), Delfi UAB and Lrytas UAB (4th quarter, from which the company has a separate office).

Energy consumption and distribution of energy sources	2023*
Total fossil energy consumption (MWh)	1 940.3
Percentage of fossil sources in total energy consumption (%)	69.1
Energy consumption based on nuclear sources (MWh)	195.2
Percentage of nuclear energy in total energy consumption (%)	6.9
Fuel consumption of renewable sources (including biomass) (MWh)	0
Consumption of purchased or acquired electricity, steam and cooling based on renewable sources (MWh)	603.8
Consumption of self-produced renewable energy used for purposes other than fuel (MWh)	0
Total renewable energy consumption (MWh)	603.8
Percentage of renewable sources in total energy consumption (%)	21.5
Total consumption of non-fossil non-renewable energy sources** (MWh)	70.1
Percentage of consumption of non-fossil non-renewable energy sources in total consumption (%)	2.5
Total energy consumption (MWh)	2 809.4

^{*} The energy consumption of the Group not covered entirely

We evaluated the climate impact of group companies based on the principle of operational control in cooperation with external experts. The methodology is based on the internationally recognized Greenhouse Gas (GHG) Protocol standard. For Estonian companies, we also followed the guidelines of the Ministry of the Climate, for Latvian and Lithuanian companies, the Estonian-specific emission factors are replaced with corresponding emissions factors from the UK DEFRA conversion factor database.

GHG Protocol divides a company's greenhouse gas (GHG) emissions into three scopes:

- **Scope 1** includes direct greenhouse gas emissions from sources owned or controlled by the organization. This includes, for example, emissions from vehicle fuels.
- **Scope 2** includes indirect emissions resulting from outsourced energy.
- Scope 3 includes other indirect emissions that occur as a result of activities directed upwards or downwards in the organisation's value chain. From the categories of the third scope are entirely covered capital goods, fuel and energy related activities, transportation and distribution, waste, business travel and employee commuting. In the category of purchased goods and services, the activities of outdoor advertising companies, office supplies of

^{**} Municipal waste and peat have been considered as non-fossil non-renewable energy sources

media companies and the impact related to paper publications of Estonian media companies are entirely covered. The impact of the parent company, Lrytas and Biļešu Paradīze is partially covered. In the case of Delfi Meedia and Geenius Meedia, which distribute paper publications, the impact of transport in the subsequent stages of the value chain and the impact of handling the sold products at the end of their lifecycle have also been calculated – these categories are not relevant for other companies.

Benchmark	2023*
GHG emission of Scope 1	
Total GHG emission of Scope 1 (in CO2 equivalent tons)	138.8
GHG emission of Scope 2	
Location-specific measured total GHG emission of Scope 2 (in CO2 equivalent tons)	934.8
Market-specific measured total GHG emission of Scope 2 (in CO2 equivalent tons)	1 011.9
Significant GHG emission in Scope 3	
Indirect (Scope 3) total amount of total GHG emission (in CO2 equivalent tons)	4 008
1. Purchased goods and services**	2 059
2. Capital goods	323.4
3. Activities related to fuel and energy (which do not belong to Scopes 1 or 2)	164.8
4. Transport and distribution in the previous stages of the value chain	1.7
5. Waste generated in the course of operations	10.7
6. Business travel	281.8
7. Employees' commute to and from work	776.9
9. Transport in subsequent stages of the value chain	389.6
12. Handling of sold products at the end of their lifecycle	0
Total GHG emission	
Total GHG emission (location-specific) (in CO2 equivalent tons)	5 081.4
Total GHG emission (market-specific) (in CO2 equivalent tons)	5 158.5

^{*} The climate impact of the Group not covered entirely

We take into account the results of the climate impact analysis in creating our climate policy and developing strategies, including in shaping of targeted measures to reduce the climate impact across the entire Group, and in the future we plan to assess energy consumption and climate impact across the Group.

Overview of 2023: resources efficiency and circular economy

In 2023, we initiated a comprehensive assessment of the risks related to resourced efficiency and the circular economy, and we plan to complete the assessment in 2024. In addition, we plan to conduct smaller risk analyses every year. However, already in 2023, we have moved in small steps towards reducing our resource use in various fields of activity.

"In 2023, our efforts towards sustainable development were characterized primarily by the trend to reduce the environmental impact of printed products. These are our first steps that lay the foundation for broader environmental initiatives, including digital sustainability."

Argo Rannamets, CFO and member of the Management Board of Ekspress Grupp

Print

Our print media companies constantly monitor the quantities of their print publications, the number of returns, and optimise circulations accordingly. Returned copies are sent to recycling. At the beginning of 2023, Õhtuleht Kirjastus decided to give up one delivery day a week due to the price increase of the delivery company, and Õhtuleht was published five days a week instead of the previous six. Geenius Meedia has also reduced the circulation of its paper editions, and from December 2023, Delfi Meedia will publish Tervis Pluss magazine only online.

^{**}Includes, among others, the impact of cloud computing and data center services

"Although the decision to give up one delivery day was made primarily for commercial reasons, its environmental impact is clearly positive."

Erik Heinsaar, CEO of Õhtuleht Kirjastus

In April 2024, Eesti Päevaleht (EPL) will stop publishing a paper edition on business days and will continue as a digital publication within the Delfi portal. EPL's weekend edition LP which has longer and more in-depth articles will continue to be published on paper.

Benchmark	2023
Percentage of printed materials unsold in retail*	53.06%
of which taken into reuse	100%

^{*} Average of print product companies (Delfi Meedia, Geenius Meedia, Õhtuleht).

Waste

For several years, the vast majority of our subsidiaries have been collecting their waste separately in their office premises. Outdoor advertising company D Screens in Latvia has started using parts of old screens as spare parts for working equipment.

Overview of 2023: supply chain

Significant part of our environmental impact comes from our value chain. To manage this impact, we must consciously choose our suppliers, service providers and conduct active discussions with our partners to influence them to make more sustainable and responsible choices.

In 2023, we started integrating sustainability criteria into our purchasing principles, focusing primarily on environmentally-friendly products and services. This is an important step and we intend to expand these criteria in the coming years. This assessment is part of our broader initiative to work with supply chain partners and encourage the adoption of sustainable practices. Our goal is to create a comprehensive understanding of suppliers' commitment to ESG standards and gradually increase the proportion of suppliers that comply with these principles. To reduce the environmental impact of the supply chain, we consider the following.

- 1. Environmentally-friendly printing service: we use the printing service of two printing houses, Printall and Kroonpress. Both printing houses have an environmental policy in place, an ISO 14001 certificate and FSC[®] and PEFC[™] certificates for the use of paper from sustainably managed forests, as well as the Nordic swan label and European Union ecolabel licenses.
- 2. **Choice of paper:** our printing service partner Printall uses paper produced from paper waste, which is not suitable to be used for producing construction wood, but instead of being used as fuel, it allows to create more added value through the use of paper products.
- **3. Waste:** according to the printing service provider, about 20% of the paper in production is inevitably used for cutting and setting, and savings can be found for the remaining 80%. 98% of all waste is reused. Afterburners for drying residues from printing machines help to reduce air pollution.

In addition to the efforts of print publications, the Latvian outdoor advertising company D Screens uses energy use per square meter as one of the criteria when choosing suppliers and monitors CO2 emission certificates. In Estonia, Linna Ekraanid has also mainly monitored the energy efficiency of products offered by suppliers and increasingly also the footprint created by production.

Benchmark	2022	2023	Target for 2025
Percentage of main suppliers who follow the same commercial behaviour practices as Ekspress Grupp	_*	_*	-
Percentage of key suppliers that adhere to ESG principles	_*	_*	100%
Percentage of paper with sustainable origin, recycled paper and/or certified paper in Delfi Meedia/Geenius Meedia/Õhtuleht Kirjastus	12%/-	72.2%/38.4%/26.8%	-

^{*} In 2022 and 2023, Ekspress Grupp did not yet have criteria for evaluating suppliers across the Group, which is why these indicators are not yet reported.

Reporting according to the EU taxonomy regulation

In order to meet the objectives of the European Green Deal, the European Commission adopted in 2020 a classification system for sustainable economic activities ("Taxonomy Regulation") with the aim of encouraging private sector investment in sustainable economic activities. The Taxonomy Regulation sets out specific requirements and technical screening criteria for economic activities that would contribute to EU's environmental objectives.

The delegated act on the climate objectives of the Taxonomy Regulation ("Taxonomy Climate Delegated Act") was adopted in 2021, setting out technical screening criteria for the activities of nine economic sectors. These criteria focused on the economic activities and sectors that have the greatest potential to contribute to the EU's climate goals. The basis for the criteria was the total greenhouse gas emissions of the economic activities or the potential to support the prevention, sequestration or long-term storage of greenhouse gases. In 2023, the Taxonomy Regulation was supplemented by the adoption of the Environmental Delegated Act (environmental act). The environmental act focuses on the remaining four environmental objectives: sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and protection and restoration of biodiversity and ecosystems.

Ekspress Grupp's activities are covered in the activities outlined in the climate act, but not in the list of activities covered by the environmental act. Therefore, the reporting of Ekspress Grupp's according to the EUR taxonomy regulation is based on the climate act.

As a large listed company, Ekspress Grupp is obliged to assess the group's contribution to climate change mitigation and climate change adaptation using three performance indicators according to the taxonomy regulation:

- proportion of turnover from products or services associated with taxonomy-aligned economic activities,
- proportion of capital expenditures (CapEx) from products or services associated with taxonomy-aligned economic activities,
- proportion of operational expenditures (OpEx) from products or services associated with taxonomy-aligned economic activities.

Taxonomy-related activities of AS Ekspress Grupp*

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities in 2023

		2023		Substantial contribution criteria						
Economic activities	Code	Turnoverth' EUR	Proportion of turnover%	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular Economy	Biodiversity	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, 2022
A. TAXONOMY-ELIGIBLE ACTIVITIES										
A.1. Environmentally sustainable a	ctivities (taxo	nomy-aligne	ed)*							
A.1. Environmentally sustainable activities (taxonomy-aligned) total	-	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of w	nich enabling	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of whic	n transitional	0	0.00%	0.00%						0.00%
A.2. Taxonomy-eligible but not env	rironmentally s	sustainable	activities (no	t taxonomy-a	ligned activit	ies)				
6.6. Freight transport services by road	CCM/CCA 6.6	523	0.71%	EL	EL	N/EL	N/EL	N/EL	N/EL	1.87%
13.1. Creative, arts and entertainment activities	CCA 13.1	973	1.33%	N/EL	EL	N/EL	N/EL	N/EL	N/EL	0.91%
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) total		1 496	2.05%	0.71%	1.33%	0.00%	0.00%	0.00%	0.00%	2.78%
TOTAL (A.1 + A.2)		1 496	2.05%	0.71%	1.33%	0.00%	0.00%	0.00%	0.00%	2.78%

TOTAL (A + B)	73 086	100.00%
Taxonomy-non-eligible activities (B)	71 591	97.95%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES		

^{*} The Group does not have turnover, CapEx and OpEx from products or services associated with taxonomy-aligned economic activities (see subsection "Assessment of compliance with the Taxonomy Regulation)".

Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities in 2023

		2023 Substantial contribution criteria								
Economic activities	Code	CapEx th' EUR	Proportion of CapEx %	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular Economy	Biodiversity	Proportion of Taxonomy aligned (A.1.) or -eligible (A.2.) CapEx, 2022
A. TAXONOMY-ELIGIBLE ACTIVITIES	5									
A.1. Environmentally sustainable a	ctivities (ta	xonomy-alig	ned)*							
A.1. Environmentally sustainable activities (taxonomy-aligned) total	-	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	h enabling	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which t	ransitional	0	0.00%	0.00%						0.00%
A.2. Taxonomy-eligible but not env	/ironmental	ly sustainab	le activities (not taxonomy	-aligned acti	vities)				
9 1	CCM/CCA 6.6	0	0.00%	EL	EL	N/EL	N/EL	N/EL	N/EL	0.00%
13.1. Creative, arts and entertainment activities	CCA 13.1	0	0.00%	N/EL	EL	N/EL	N/EL	N/EL	N/EL	0.00%
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) total		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL (A.1 + A.2)		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

B. TAXONOMY-NON-ELIGIBLE ACT	IVITIES			
Taxonomy-non-eligible activities (B)		7 937	100.00%	
TOTAL (A + B)		7 937	100.00%	

^{*} The Group does not have turnover, CapEx and OpEx from products or services associated with taxonomy-aligned economic activities (see subsection "Assessment of compliance with the Taxonomy Regulation)".

Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities in 2023

		2023		Substantial contribution criteria						
Economic activities	Code	OpExth' EUR	Proportion of OpEx %	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular Economy	Biodiversity	Proportion of Taxonomy aligned (A.1.) or -eligible (A.2.) OpEx, 2022
A. TAXONOMY-ELIGIBLE ACTIVITIES										
A.1. Environmentally sustainable ac	tivities (ta	xonomy-alig	ned)*							
A.1. Environmentally sustainable activities (taxonomy-aligned) total	-	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	enabling	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which tra	ansitional	0	0.00%	0.00%						0.00%
A.2. Taxonomy-eligible but not envir	ronmental	ly sustainab	le activities (not taxonomy	y-aligned acti	vities)				
9 1	CCM/CCA	0	0.00%	EL	EL	N/EL	N/EL	N/EL	N/EL	0.00%
13.1. Creative, arts and entertainment activities	CCA 13.1	0	0.00%	N/EL	EL	N/EL	N/EL	N/EL	N/EL	0.00%
A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) total		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL (A.1 + A.2)		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

B. TAXONOMY-NON-ELIGIBLE ACTIVITIES	s	
Taxonomy-non-eligible activities (B)	0	0.00%
TOTAL (A + B)	0	0.00%

^{*} The Group does not have turnover, CapEx and OpEx from products or services associated with taxonomy-aligned economic activities (see subsection "Assessment of compliance with the Taxonomy Regulation)".

Accounting policy

Performance indicator related to turnover

Denominator includes sales revenue generated in the course of the Group's business activities and recorded in accordance with the International Accounting Standard IAS 1 (section 82 point a). The main activity of the Group is the production of online media content and publishing of newspapers, magazines and books. The Group also manages an electronic ticket sales platform and ticket sales points and offers outdoor advertising service in Estonia and Latvia. The importance of organisation of entertainment events and thematic conferences in the Group's business activities is also growing. The main activities of the Group are supported by information technology development, audio-visual production solutions, rental of advertising space and home delivery of paper publications. The numerator includes the Group's sales revenues which correspond to the descriptions of the activities outlined in the Taxonomy Climate Act.

In order to avoid double accounting of key performance indicators associated with sales revenue, each category of sales revenue was looked at separately. In addition, cross-group transactions were mapped.

Performance indicator related to CapEx

Denominator includes the Group's investments in 2023. In the reporting year, the Group invested in property, plant and equipment and intangible assets and recognised new lease agreements according to IFRS 16. The Group has no capital expenditures: a) that are related to the activities generating sales revenue, which correspond to the taxonomy-eligible

activities; b) that are the part of a plan to expand Taxonomy-aligned economic activities or to allow taxonomy-eligible economic activities to become taxonomy-aligned; c) that are related to the purchase of output from taxonomy-aligned economic activities and individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions. Therefore, the Group has no capital expenditure related to the taxonomy-eligible activities to include in the numerator, and the Group reports all capital expenditures as taxonomy-non-eligible activities.

Performance indicator related to OpEx

According to the Taxonomy Regulation, the denominator of operating expenditures must include direct non-capitalised costs associated with research and development, building renovation measures, short-term rent, maintenance and repair, and all other direct costs related to the daily servicing of the property, plant and equipment by the company or by a third party to whom the operation has been transferred, and which are necessary to ensure the continued and efficient operation of such asset.

The Group has no operating expenditures that are within the meaning of the Taxonomy Regulation, which are associated to activities related to sales revenue that correspond to the taxonomy-eligible activity. Therefore, the Group has no operating expenditures within the meaning of the Taxonomy Regulation.

Assessment of compliance with the Taxonomy Regulation

For the calculation of performance indicators, as a first step Ekspress Grupp assessed which activities of the Group are taxonomy-eligible activities. The Group used NACE codes of the activities listed in the climate act and the descriptions of the activities.

According to the Taxonomy Regulation, activities that contribute to climate goals are divided into three: low-emission activities, supporting activities, and transitional activities. According to the explanations of the climate act, we considered only activities supporting the adaptation goal to be considered for the purpose of adapting to the climate impact.

Among the activities related to the Group's sales revenue, two economic activities are taxonomy-eligible activities:

- ➤ Home delivery of periodicals until July 2023, which corresponds to the activity outlined in the climate act 6.6. Freight transport services by road (NACE H53.1.0) and which can be either a low-emission activity or a transition activity according to the Climate Act.
- Organisation of events that corresponds to the activity outlined in the climate act 13.1 Creative, arts and entertainment activities (NACE R90), which is an activity supporting adaptation to climate change according to the Climate Act.

Of the taxonomy-eligible activities, Ekspress Grupp is also engaged in intra-group data processing and web hosting, which corresponds to the activity outlined in the climate act 8.1. Data processing, hosting and related activities (NACE J63.11), but does not provide services to external customers. Therefore, Ekspress Grupp has no turnover within the meaning of the Taxonomy Regulation and the Group excluded this activity from the taxonomy-eligible activities.

In order to assess the taxonomy-aligned activities according to the Taxonomy Regulation, it is necessary to assess whether the activities can be considered environmentally sustainable, i.e. whether the activities meet the following requirements:

- The activity significantly contributes to the achievement of one or more environmental goals;
- > The activity does not cause significant damage to any other environmental objective
- The activity operates with minimal safeguards
- > The activity meets the technical screening criteria

Technical screening criteria

The Climate Act of the Taxonomy Regulation adopted technical screening criteria which

- establish the requirements on the basis of which economic activity is classified as significantly contributing to a climate goal, and
- > ensure that economic activity does not cause significant harm to any other environmental objectives

Home delivery of periodicals until July 2023

Home delivery service is provided with N1 category vehicles. As the cars used for home delivery are not electric, the activity does not meet the technical screening criterion of the Climate Act, according to which direct (tailpipe) CO2 emissions of N1 vehicles must be equal to zero.

The activity can be considered a transitional activity if the activity meets other technical screening criteria, including the requirements for avoiding significant harm.

In the case of the home delivery of periodicals, not all criteria regarding significant harm are met. The assessment of physical climate risks, which is a technical screening criterion for avoiding significant harm related to the climate change adaptation goal, has not been carried out. Therefore, in the Group's opinion, the activity cannot be considered a taxonomyaligned activity.

Event management

Sales revenue related to an activity contributing to the achievement of the climate change adaptation objective can be considered a taxonomy-aligned activity if the activity is classified as a supporting activity. The organisation of events can be considered an activity supporting adaptation to climate change if the activity meets the following technical screening criteria:

"On the basis of data on current and future climate risks, including uncertainty assessment and reliable data, the company demonstrates that the activity ensures the achievement or promotion of the use of a technology, product, service, information or practice that has one of the following main objectives:

- (a) increase the resilience of other people, nature, cultural heritage, assets and other economic activities to physical climate risks;
- (b) contribute to adaptation efforts that take into account other people, nature, cultural heritage, assets and other economic activities."

Ekspress Grupp estimates that the corresponding technical screening criterion has not been met since the events organised in 2023 did not focus directly on the topic of climate change adaptation. Technical screening criteria for avoiding significant harm have not been established for the activity.

Minimum safeguards

Ekspress Grupp evaluated minimum safeguards criteria of the Taxonomy Regulation on the basis of Article 18 of the Taxonomy Regulation and the report *Final Report on Minimum Safeguards* of the Platform on Sustainable Finance, European Commission advisory expert group. According to the guidelines of the expert group, the company must have minimum protective measures in four areas:

- Human rights, including workers' rights
- Avoiding corruption and bribery
- Honest tax behaviour
- > Fair competition

Minimum safeguards mean compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. With its ESG strategy, Ekspress Grupp confirms that the Group follows the abovementioned guidelines and principles in all of its activities. The respective business ethics principles have also been laid down in the code of conduct of Ekspress Grupp. The purpose of implementing the ESG strategy is, inter alia, to launch implementation of the due diligence process.

Contextual information

Sales revenues:

Activity 6.6. Freight transport services by road (NACE H53.1.0) – the Group provides the service of home delivery of periodicals to a joint venture until July 2023. The quantitative distribution of the numerator is shown in the table "Taxonomy-related activities of AS Ekspress Grupp".

Activity 13.1 Creative, arts and entertainment activities (NACE R90) – the Group organises entertainment events. The numerator includes income from ticket sales and other income related to entertainment activities, except for income from advertising sales. Income from organisation of conferences and seminars is also excluded from this activity. The quantitative distribution of the numerator is shown in the table "Taxonomy-related activities of AS Ekspress Grupp".

<u>Capital and operating costs</u> – the Group has no costs that are included in the numerator.

HONEST AND RESPONSIBLE MANAGEMENT

Ethical business practices have always been an integral part of Ekspress Grupp's business operations. Our goal is to maintain a transparent business environment and to carry out our activities responsibly and ethically – this is the basis of the trust of the parties related to the Group and the general public. We mapped our important areas of influence in the field of management during the creation of the ESG strategy. The process of strategy creation and identification of the areas of influence is described in more detail on pages 3-5.

Ekspress Grupp has a zero tolerance policy for any kind of corruption. Therefore, our employees will not give, demand, receive or accept gifts, payments, services or other benefits from a current or potential business partner if the gift, payment, service or other benefit can reasonably be expected to influence the decision and goes beyond the limits of normal hospitality. We also do not tolerate illegal payments, bribes or favours aimed at speeding up decision-making in public authorities.

Every employee must apply our principles of business ethics and guidelines for business communication inside and outside the company as laid down in our Code of Conduct. It applies to all employees of AS Ekspress Grupp and its subsidiaries, joint ventures and affiliates, regardless of their position in the organisation and the nature of their employment. The Code of Conduct is a guide for every employee's daily business interactions inside and outside the company, and reflects our accepted standard of behaviour. The Code of Conduct does not replace the journalism code of ethics, but complements it.

You can read more about our Code of Conduct in the Corporate Governance Report in 2023 annual report.

ESG strategy					
Commitment	> Group companies must be managed honestly, in a law-abiding matter and ethically.				
Target for 2025	 Zero cases of corruption or violation of business ethics related to group companies or employees. 				
Strategic activities	> We implement Ekspress Grupp's Code of Conduct in all Group companies and we ensure the transparency and integrity of the company's management structure.				

The role of our administrative, management and supervisory bodies in relation to business conduct and their expertise in matters of business conduct is described in the Corporate Governance Report in 2023 annual report.

Overview of 2023: prevention of corruption and bribery

In 2023, we continued to promote an open and transparent management culture. We maintain employee awareness through regular meetings, newsletters, and business ethics training that all new employees must complete. Going forward, we intend to reinforce these practices with more interactive training and enhanced supervision.

Corruption and bribery cases are dealt with by a committee created on a case-by-case basis, the members of which are not related to the investigated case or the persons involved in it. We follow the principles of the UN Convention against Corruption. In 2023, there were no cases of corruption at Ekspress Grupp. We dealt with minor violations of business ethics by reinforcing training of business ethics, and in one case issued a warning to an employee of Delfi Meedia. We remain vigilant and committed to maintaining the highest standards in our business conduct.

Benchmark	2022	2023	Target for 2025
Proportion of employees who work in positions with the highest risk of corruption and/or bribery and who are trained in this area	-	-	-
Number of confirmed corruption cases involving companies belonging to the Group or their employees	0	0	0
of which cases when the employee was fired or sanctioned	0	0	0
of which cases where a contract concluded with a business partner was terminated or was not extended	0	0	0
Number of violations of competition rules involving Group companies	0	1***	0
Number of sanctions or fines related to violations of laws or other regulations	3*	33**	0
Amount of sanctions or fines related to violations of laws or other regulations, EUR	11 706	144 100	0

^{*} Delfi Latvia was fined EUR 220 for copyright infringement of a photo and EUR 1 468 in connection with the labour dispute. D Screens SIA was fined EUR 10 000 for not signing the contract after winning the auction.

Overview of 2023: political influence and lobbying

In 2023, the companies of Ekspress Grupp and the key persons of the Group did not support the activities of any political party, nor did they themselves receive any other hidden funding from political parties or government agencies, apart from advertising space purchased on market terms and project-based grants publicly available to all applicants.

Benchmark	2022	2023
The total amount of expenses related to lobbying or advocacy, EUR	10 900	17 000
Membership fees of professional or advocacy organizations, EUR	32 601*	116 557

^{*} In the 2022 report, the amount of membership fees of professional or advocacy organisations was mistakenly reported as EUR 9 595 which took into account only the fees of AS Delfi Meedia. The consolidated amount was EUR 32 601.

Overview of 2023: relations with suppliers and payment practices

Since our relations with suppliers are closely linked to the fulfilment of our environmental goals, we describe the related strategy in the environmental chapter of the ESG report on page 3.

Benchmark	2022	2023
Payments in compliance with standard terms and conditions, % (average for companies)	-	93.46%
Pending court proceedings related to late payments	-	4

Overview of 2023: notification of violations

Incidents that are in conflict with the principles of business ethics or other values of Ekspress Grupp can be reported through the group-wide anonymous notification channel. To ensure confidentiality, the notification channel is managed by an external partner (WhistleB). Notifications are sent over an encrypted connection and are password-protected. All reports of misconduct are treated in the strictest confidence. In 2023, six notifications were submitted there, but as none of them were relevant, they did not require further investigation.

^{**} Of these, 19 were related to D Screens. The Riga City Government imposed fines in the total amount of EUR 2 986 for several cases where there were inaccuracies in advertising or the location of the advertising object had not been approved, in addition a smaller fine for failure to pay electricity bills on time from the electricity service provider and a fine from the Tax Board for incorrect calculation of income tax. Delfi Meedia paid 12 compensations in the total amount of EUR 2 080 to Copytrack for use of images without copyright. The remaining amount of EUR 140 460 is the fine imposed by the Lithuanian Competition Authority on Ekspress Grupp in connection with the acquisition of Lrytas. AS Ekspress Grupp has contested the decision in court.

^{***} The Lithuanian Competition Council imposed a fine on AS Ekspress Grupp for violating competition rules when purchasing Lithuanian news portal Lrytas. AS Ekspress Grupp has contested the decision in court.