

# SUSTAINABILITY STATEMENT

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## GENERAL INFORMATION

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It is the third year that Ekspress Grupp publishes a separate ESG (environmental, social and governance) 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 company and all its subsidiaries as part of its annual report. 2024 is the first year, when Ekspress Grupp publishes its sustainability statement in compliance with the EU Corporate Sustainability Reporting Directive (CSRD), European Sustainability Reporting Standards (ESRS) and the Estonian Accounting Act (RPS).

As before, the Group's sustainability activities and, in connection with it, the report are based on the ESG strategy created in 2022. The focus of the statement is set on the material topics identified in the strategy creation and during double materiality assessment (DMA). We measure and analyse our development in these areas with the help of metrics directly related to the strategy, as well as with the metrics required in the ESRS topical standards. In 2024, we have collected more data on ESRS metrics than the year before, and we plan to add and disclose additional data on policies, assessments and activities also during 2025, when we will further implement ESG governance practices throughout the Group.

In assessing material focus topics, we have taken into account the extent of our supply chain and the view of our customers. For the most part, our policies, metrics and targets only cover the activities of our companies and their impact on customers and end-users. The metrics 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 metric or policy description.

## Basis of preparation

### BP-1 – GENERAL BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT

This sustainability statement has been prepared on a consolidated basis with the same scope as the financial statements for AS Ekspress Grupp for the financial year 2024 in accordance with EU's Corporate Sustainability Reporting Directive (CSRD), the associated European Sustainability Reporting Standards (ESRS) and Estonian Accounting Act as outlined in ANNEX I to Commission Delegated Regulation (EU) 2023/2772 and Taxonomy Regulation (EU) 2020/852. Associates and joint ventures are not included in the consolidated data. Consolidation of all data follows the principles above, unless otherwise specified in the accounting policies.

The impacts, risks and opportunities identified through the double materiality assessment pertain to both Ekspress Grupp's own operations and value chain (as detailed in specific disclosures), while the extent to which policies, actions, metrics and targets go beyond the Group's own operations varies depending on the nature of the topics and is indicated in the topical standards.

Ekspress Grupp has not omitted any classified or sensitive information and information on intellectual property, know-how or results of innovation, as described in ESRS 1 section 7.7. Additionally, we have not used the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in articles 19a(3) and 29a(3) of Directive 2013/34/EU.

### BP-2 – DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

#### Value chain

The sustainability statements cover Ekspress Grupp's upstream and downstream value chain as the related impacts, risks, and opportunities have been identified and assessed during the double materiality assessment process. Selected policies, actions, and targets that we have described in the relevant subsections extend to our value chain. The extent to which policies, actions, metrics and targets go beyond the Group's own operations varies depending on the nature of the topics and is indicated in the topical standards.

#### Measurement basis

The accounting policies have been applied consistently in the financial year and for comparative figures. Calculation factors used are listed on the pages with the relevant metrics, together with references.

## External review

AS Ekspress Grupp's auditor KPMG Baltics OÜ has performed assurance of our sustainability statements (please see the auditor's limited assurance report). For existing metrics tied to our ESG strategy, we have worked with outside consultants on our ESG strategy development, however these estimates have not been further validated by external bodies other than the assurance provider.

## Use of estimates

Where estimates are used to provide, e.g. consolidated group-wide reporting, such estimates and practices are described in the accounting principles applicable to the data or information, including any related measurement uncertainty.

The majority of the disclosed quantitative data has been obtained directly from the Group's accounting systems. The collection of data through alternative means, such as estimation or inclusion of partners within the value chain, is explicitly indicated. In preparing the sustainability statements, subsidiaries' managements made use of assumptions, judgments and estimates that affect the amounts reported, especially in relation to the group's Scope 3 emissions. Due to evolving reporting practices also from the partner's side, there is an inherent uncertainty in GHG calculations. However, we believe the estimates and assumptions are reasonable under the circumstances. We have not used estimates but rely on the data provided to us by our value chain partners and invoices or other relevant documents. For example, due to high uncertainty, we are not able to disclose reliable data related to our companies' waste management under Environmental disclosure and some uncertainty is present in metrics under the Social Disclosure related to family related leaves and to the trainings offered for our own workforce.

The used estimates and underlying assumptions are reviewed on an ongoing basis to improve accuracy in future reported metrics, with any revisions potentially impacting the reported amounts. In order to enhance the level of accuracy in subsequent annual reporting, we are planning to increase our data collection systems and databases and further collaborate with our value chain partners to close the existing information gaps.

## Changes and errors

The sustainability disclosures in this report have been expanded significantly compared to the previous year. This is done in order to comply with the requirements of the CSRD and ESRS for the first time in 2024. Where practices have changed, or in the event errors have occurred since the prior reporting period, such changes are described in the respective reporting principle or in the section where the topic is reported.

# Sustainability governance

## GOV-1 - THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

### Management responsibilities and composition

Ekspress Grupp's governance enables to deliver on the necessary and respective sustainability matters as identified by the DMA in 2024 and published in this report. The governance of Ekspress Grupp follows the Corporate Governance Code. The Code of Corporate Governance is a guidance document created by the Estonian Financial Supervision and Resolution Authority primarily for the public listed companies.

For the Group, the general meeting is the highest management body of AS Ekspress Grupp. The ordinary general meeting is held once a year, no later than six months after the end of the financial year at the company's office. An extraordinary general meeting is convened in cases provided for by the Estonian law. Ekspress Grupp's administrative, management and supervisory bodies are the Management Board, the Supervisory Board and the Audit Committee. The organisational structure of Ekspress Grupp at the top three levels is defined by a blend of strategic and operational leadership. In our executive management and supervisory board, we have 3 executive and 4 non-executive members.

At the topmost level, the Supervisory Board provides governance and strategic direction to lead the company's day-to-day operations and implement strategies approved by the Supervisory Board. The work of the Supervisory Board is organised by the Chairman of the Supervisory Board. The main task of the Supervisory Board is to approve the Group's most important strategic and tactical decisions and to supervise the activities of the Group's Management Board. Members of our Supervisory Board have long experience from several sectors like media, technology, telecommunications, finance and investments. Multiple members have previous or current experience as members of supervisory board in other large companies that allow for strategic decision-making. In its activities, the Supervisory Board is guided by the company's articles of association, the

guidelines of the general meeting and Estonian laws. The Supervisory Board can consist of three to seven members, elected for 5-years tenure on the General Meeting.

**During 2024, Ekspress Grupp's Supervisory Board consists of 4 non-executive members, with 3 male and 1 female representatives (25% gender diversification ratio and 50% independent members):**

- **Priit Rohumaa, Chairman of the Supervisory Board and Member of the Audit Committee until 16.06.2025**
- **Hans H. Luik, Founder and major owner of Ekspress Grupp, Member of the Supervisory Board until 20.05.2029**
- **Triin Hertmann, Independent Member of the Supervisory Board until 02.05.2027**
- **Sami Seppänen, Independent Member of the Supervisory Board until 31.08.2027**

Below the Supervisory Board, sits the Executive Management, whose purpose is to execute day-to-day management which aligns with the strategy set by the Board. Their tasks include ensuring compliance with general policies and guidelines and applicable regulations; continuously reporting to the Board on the Group's activities, financial state, and other significant matters; decision-making on resource allocation; ensuring sustainability and business conduct align with the company's long-term plans. Our executive management has the responsibility of leading the whole group and our subsidiary companies. At the group level, there is a regular exchange of information between the management board of the parent company of Ekspress Grupp and the managers of the subsidiaries, which ensures the involvement of a wider circle of decision-makers and transparency in the case changes and decisions. Through continuous communication with subsidiary executive management, all relevant business-related aspects are covered, including the representation of workforce and people.

According to the articles of association, the board may have one to five members. The member(s) of the Management Board of Ekspress Grupp are elected on the basis of gender neutrality and assessing the actual competence of the persons. Similarly to the Supervisory Board, our three Executive Management members have vast experience in working with large-scale companies in Estonia. The Chairman of the Management Board has long-term experience in the media sector as managing director of both Delfi Meedia and Ekspress Meedia. Other board members have relevant experience in innovation, marketing, business management and finance, serving as management board members of multiple companies. As sustainability in general is an increasingly more important topic and closely related to our activities, strategy and initiatives, our executive management and company leadership teams are constantly educating themselves in their field of operation with regards to sustainability topics.

**During 2024, Ekspress Grupp's Executive Management consists of 3 executive members, with 2 male and 1 female representatives (33% gender diversification ratio, 0% independent members):**

- **Mari-Liis Rүүtsalu, Chairman of the Management Board and Chief Executive Officer until 31.12.2025**
- **Karl Anton, Member of the Management Board and Chief Innovation Officer until 05.06.2026**
- **Argo Rannamets, Member of the Management Board and Chief Financial Officer until 29.01.2025**

## Oversight of sustainability IROS

Sustainability management, including oversight of the impacts, risks and opportunities (IROS) in the Group is integrated into the overall management model and is part of the Group's and its subsidiaries' daily business. Ekspress Grupp's Supervisory Board has approved the Sustainable Development Strategy in 2023. The Sustainable Development Strategy is based on ESG requirements and provides general directions and goals for implementing a responsible business practice throughout Ekspress Grupp's areas of activity.

The implementation of the strategy and oversight of sustainability related matters and IROS on the Group level fall under the responsibility of the Group's CFO, who is responsible and provides companies with the main directions for implementing a responsible business culture. The management and oversight of material IROS is supported by the implemented Sustainable

Development Strategy and the Group annually collects sustainability data from its subsidiaries and monitors the achievement of its sustainability goals. The individual subsidiaries in the group are responsible for the daily operations based on their relevant sub-sector. The businesses are supported by group functions in terms of the sustainability aspects of navigating the management of business relationships and incorporating considerations of end-user and consumer impacts in daily operations. While we have not set any responsibilities to IRO related matters for individual subsidiaries, we have implemented sustainability reporting principles described below and are planning to further develop them to streamline processes and create a more aligned chain of command for IRO oversight. We have additionally used external experts and consultants to work on our ESG strategy and data collection.

Back 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, best practices, 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 anticipated bottlenecks and progress towards a general strategic goal. As specific action-based targets, as explained in each topical section, are currently not in place we will develop additional guidelines, policies and governance practices on a group level to further monitor material topics and data collection processes. While our Management Board has relevant knowledge and expertise to manage the material IROs based on the relation to our Group activities in the field of a media company, going forward, we are planning to continue working together with external experts and consultants to work on our ESG strategy and governance process and create additional training opportunities for our key parties related to material IROs and their oversight. For example, our management is well aligned with IROs related to our social and governance topics but going forward we expect additional further guidance from both external consultants and internal subject-matter experts on our environmental IROs in creating a strong environmental strategy, that supports our activities and transition towards our goals.

## **GOV-2 – INFORMATION PROVIDED TO, AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING’S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES**

The Supervisory Board is informed of and addresses sustainability issues throughout the year. The reporting lines for information on material IROs are disclosed in the section “Oversight of sustainability IROs”. The Board receives updates on sustainability through annual DMA reports, ESG reports and general annual reporting, showing policy results, actions, metrics, and targets. As 2024 was the first year of reporting under CSRD and included a more thorough assessment of IROs through DMA, each included entity’s responsible person was involved in the process and has addressed the material IROs, that have been further approved by the Supervisory Board. The Management Board is informed of relevant material sustainability matters on a day-to-day basis by either the CFO or subsidiary CEOs.

In addition, at quarterly meetings of the Supervisory Board of subsidiaries, the person responsible for ESG related topics in the subsidiary provides an overview of material ESG-related impacts, risks and opportunities, and the performance of policies, measures, metrics and objectives related to the impact, risks and opportunities. Once a quarter, the Management Board of the Group presents the status of the ESG topics to the Supervisory Board of the Group. Executive Management meets with business unit heads in quarterly meetings where ongoing sustainability matters are monitored and discussed and action taken if needed. So far we have not identified the material need to significantly act on changing our business model and general governance strategy nor trade-offs associated with the material IROs. The list of material IROs addressed by the Board and Executive Management during the reporting period is disclosed alongside the topical disclosures and in disclosures under IRO-1.

## **GOV-3 – INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES**

In accordance with the general strategy, Ekspress Grupp builds sustainable growth by being part of the opportunities presented by the digital transformation. The objective of the Group is to increase shareholder value through revenue growth and improved profitability. Ekspress Grupp is developing and expanding its media business and seeking growth opportunities in new digital media or media-related businesses. The Group’s remuneration policy is aimed at promoting the long-term financial success and competitiveness of the Group and creating shareholder value. The structured approach to salaries, extras, and position categorisation ensures that all employees are treated fairly, with compensation based on objective criteria rather than subjective or discriminatory factors.

The remuneration and employment terms of the members of the Supervisory Board are determined by the Annual General Meeting, which also evaluates the work of the Supervisory Board. The Chairman of the Supervisory Board receives

remuneration. The other members of the Supervisory Board do not receive any remuneration unless the General Meeting decides otherwise. No other fees are paid to the Supervisory Board members or Chairman for the participation in the work of the committees. The Supervisory Board is responsible for preparing the remuneration policy for the Management Board. To ensure that these principles are used for the intended purpose, the Supervisory Board prepares and proposes amendments to the remuneration policy. The Supervisory Board decides on the remuneration of the Management Board members and other terms and conditions of the Management Board members' contracts of employment. The remuneration of the Management Board currently does not specifically link to sustainability matters through the use of sustainability-related metrics or targets and is comprised of the following elements:

- a fixed salary;
- a short-term incentive paid annually in cash;
- a long-term incentive in the form of shares;
- other benefits.

#### **GOV-4 – STATEMENT ON DUE DILIGENCE**

In Ekspress Grupp, we acknowledge the importance of performing due diligence on environmental and social impacts, including human rights, within our value chain. Due diligence is an ongoing process that responds to and may initiate changes in our strategy, business model, activities, business relationships, operating, sourcing and selling contexts. Our process of due diligence involves an ongoing analysis of the actual and potential impacts of our business activities on people or the environment through consultations with impacted stakeholders, feedback mechanisms and research on publicly available information. Ekspress Grupp bases its activities on the Code of Corporate Governance of the Financial Supervision Authority of Estonia, the OECD Guidelines and the UN Guiding Principles on Human Rights. An integral part of the Group's contracts is the Code of Ethics and Corporate Governance, which is an important tool for fulfilling the due diligence obligations of companies regarding sustainability. The outcome of our due diligence process is incorporated in our double materiality assessment.

#### **CORE ELEMENTS ON SUSTAINABILITY DUE DILIGENCE**

##### **Embedding due diligence in governance, strategy and business model**

We don't have a formalised due diligence process in place yet, however we consciously embed sustainability in our strategy and business model, as described in our ESG strategy section. Read more in chapters [Sustainability Governance](#), [Oversight of Sustainability IRGs](#) and [Double Materiality Assessment](#)

##### **Engaging with affected stakeholders in all key steps of the due diligence**

We maintain a continuous dialogue and open communication with our stakeholders, including suppliers, employees and clients. Read more in chapters [Stakeholder Engagement](#)

##### **Identifying and assessing adverse impacts**

Read more in chapter [Double Materiality Assessment](#)

##### **Taking actions to address those adverse impacts**

Read more in chapters [Climate Change](#), [Circular Economy](#), [Our People](#), [Our End-Users](#)

##### **Tracking the effectiveness of these efforts and communicating**

We have implemented a comprehensive sustainability KPIs tracking system and we communicate the results in our annual sustainability statement. Read more in respective topical chapters.

## **GOV-5 – RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING**

Following the partial implementation of Sustainability reporting already in 2023, we have further expanded and developed our internal control systems to encompass the full scope of the sustainability reporting process. Our sustainability reporting control systems follow an approach similar to the financial reporting control system. As the sustainability reporting scope has increased in 2024, we have established a range of internal controls following an ongoing evaluation of the risks related to data accuracy and completeness. This has been done in close cooperation with internal data owners and our external consultants.

Generally, sustainability data and reporting risks can be addressed case-by-case through discussions with data owners and the executive Management, depending on materiality. The main risks identified relate to value chain data, as Ekspres Grupp does not extract or has control over them. To mitigate this risk, subsidiaries engage with value chain partners to ensure a common understanding of the data needs and required methodologies, which as a result have improved the automatic and voluntary reporting of relevant information in some supplier invoices and contracts. Additionally, we continue to improve the quality of our internal data collection by developing a more detailed understanding of data collection expectations regarding our annual reporting. Previously, risks related to the accuracy and availability of data has been present, but these are further mitigated with each year going forward and our plan to enhance our data gathering capabilities. The data collection and control during sustainability reporting is conducted by the group finance department, led by the CFO and supported by group financial controllers, who send out data collection forms. On the same principle, any discrepancies or irregular findings on the data related to our IROs will be reported to the responsible parties and if needed to the higher management after which further discussions are conducted to identify the root cause and find potential solutions and future mitigation measures.

## **Business model and strategy**

### **SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN**

A detailed description of the key elements of our general strategy together with a description of our business model, are presented in section Strategy and Goals.

The ESG strategy of Ekspres Grupp is based on the international standards of a responsible enterprise, EU environmental initiatives, CSRD, and the sector's best practices. When creating the ESG strategy back in 2022, we also mapped out preliminary material topics (materiality analysis) in cooperation with external experts. This was complimented by a more detailed double materiality assessment conducted in 2024, which is compliant 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).

As a result of the analysis of significant topics, we identified nine ESG focus areas, which do not significantly differ from the identified impact areas and focus themes from 2022. We have consolidated these themes under three areas of social impact and responsibility and have assigned priority levels to them. We have not yet assessed in detail the quantitative financial impact of these points beyond the DMA assessment, but we are planning to do it during 2025. We are further in each topical section covering the relation of mapped IROs with our ESG strategy, the main opportunities, challenges, activities and set metrics. As we are further developing our ESG governance, we are aiming to set more specific targets for our evaluated material topics in the upcoming reporting period.

**Focus topics**

- Personal and professional development
- Employee well-being
- Diversity, Equality and Inclusion



**Focus topics**

- Impactful and independent media
- Responsible advertising platform
- Customer rights and interests

**Focus topics**

- Resource use and climate impact management
- Responsible governance
- Supply chain sustainability

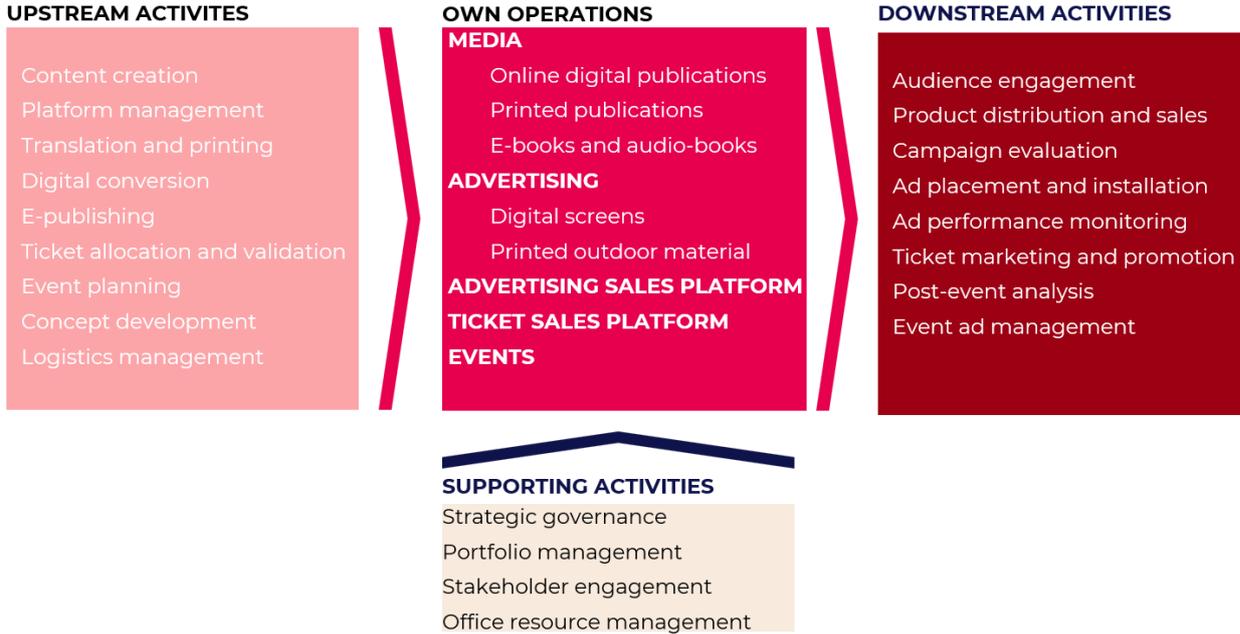
## Brief overview of the ESG strategy

Focus theme	Commitment	Target
<b>Leading ethical and responsible media group</b>		
<b>Independent and impactful media group</b>	<ul style="list-style-type: none"> <li>➤ 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.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Publications of Ekspress Grupp do not publish unethical or irresponsible information.</li> <li>➤ Zero violations of Ekspress Grupp’s journalism code of ethics (in preparation).</li> </ul>
<b>Responsible advertising platform</b>	<ul style="list-style-type: none"> <li>➤ Our goal is to be a well-known, trusted, ethical and responsible advertising platform for our customers and readers.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Zero cases where advertising or content marketing published on our platforms does not comply with our internal rules.</li> </ul>
<b>Subscribers’ rights and well-being</b>	<ul style="list-style-type: none"> <li>➤ 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.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Zero violations of personal data protection requirements.</li> <li>➤ Access is ensured to all media content, taking also into consideration the needs of people with special needs.</li> </ul>
<b>Responsible and attractive employer</b>		
<b>Personal and professional development of employees</b>	<ul style="list-style-type: none"> <li>➤ 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.</li> </ul>	<ul style="list-style-type: none"> <li>➤ We have drawn up personal study and development plans for all our employees.</li> </ul>
<b>Employee well-being</b>	<ul style="list-style-type: none"> <li>➤ We provide a working environment that promotes employee health and well-being and where employees can fulfil themselves.</li> </ul>	<ul style="list-style-type: none"> <li>➤ We preserve high employee satisfaction level.</li> <li>➤ Zero cases of work-related health damage.</li> </ul>

Focus theme	Commitment	Target
<b>Equal treatment, diversity and engagement</b>	<ul style="list-style-type: none"> <li>➤ Equal treatment, diversity and engagement are inherent to all companies and the organisational culture of Ekspress Grupp.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Zero percent wage gap between men and women.</li> <li>➤ To reach compliance with the EU Directive on gender balance in business leadership.</li> </ul>
<b>Responsibly and sustainably managed company</b>		
<b>Reduction of environmental impact: resources efficiency and climate impact</b>	<ul style="list-style-type: none"> <li>➤ We constantly reduce the climate impact of the organisation as well as services/products.</li> <li>➤ We improve the resource efficiency of our activities and products.</li> </ul>	<ul style="list-style-type: none"> <li>➤ 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*.</li> </ul>
<b>Honest and responsible management</b>	<ul style="list-style-type: none"> <li>➤ Honest and responsible management Group companies must be managed with integrity, lawfully and ethically.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Zero cases of corruption or violation of business ethics related to Group companies or employees.</li> </ul>
<b>Supply chain sustainability</b>	<ul style="list-style-type: none"> <li>➤ We require that our suppliers comply with our sustainability ambitions and values, and follow the same ESG practices.</li> <li>➤ When purchasing products and services we take into account the environmental impact when it is relevant and possible.</li> </ul>	<ul style="list-style-type: none"> <li>➤ All our main suppliers comply with ESG principles.</li> </ul>

\*We are committed to reducing our carbon footprint and have set a preliminary target to achieve this goal. During 2025, we will conduct a comprehensive evaluation of the necessary actions to reach this target. Based on our findings, we may refine our approach and adjust our targets as needed to ensure they remain ambitious, achievable, and aligned with best practices.

## Our value chain



Ekspress Grupp as a media company and its subsidiaries operate in multiple different segments, including digital and printed media, advertising solutions, ticket sales and events creation in Estonia, Latvia and Lithuania. The Group provides supporting activities, including strategic governance and management of our subsidiaries, stakeholder engagement and resource management. Further details are outlined in the Management Report and in the financial disclosures in the financial report (Consolidated Financial Statements). As a multinational group operating in the Baltic States with many different media activities within our own operations, we serve many different client groups from paper and digital media consumers and event participants, like the general public to companies seeking for advertisement services and platforms, ticket sales etc.

All our sectoral activities are considered equally important for our group companies, aligned with our strategy to offer integrated media services. From the value chain perspective, we use multiple key suppliers for all our up- and downstream activities like printing and content creation to home delivery and advertisement management. Given that the Group operates in several segments, the assessed IROs for the Group are present throughout each subsidiary’s own operations but also across the value chain. As our company operates through a dynamic and interconnected value chain, where each activity contributes to the whole, we are ultimately able to create value at every step for our employees through our business conduct and employment, our partners through supplier contracts, clients and end-users and the community through our media and entertainment offering and environment in general. As such, we are able to fulfil our strategic goals and position ourselves as a key player in achieving long-term sustainability.

## Interests and views of stakeholders

### SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

In Ekspress Grupp, we highly value the interests of our stakeholders, which are at the core of our sustainability strategy, both internal and external. Through collaborative engagement, we are able to establish valuable relationships and encourage open dialogue between respective parties to allow stakeholders to express their voice, statements, opinions and concerns clearly. Constant engagement serves as way to identify valuable insights on the views and interests of the stakeholders, which are relevant for our general strategy and business model.

Additionally, these opinions help us evaluate our commitment towards sustainable initiatives, giving us a better understanding of how to tailor our activities and approaches, if needed based on the identified impacts, risks and opportunities. When identifying relevant stakeholder groups within the context of our business and our operations, we

considered all the activities in our value chain for which we have more direct control over and stakeholder groups with whom we have open communication, which is described in the chapter above, including those indirectly affected by our activities. Through a thorough mapping and analysis of the value chain, we made sure that all relevant stakeholders were included to the extent possible and their opinions accounted for. Our mapping identified several groups of stakeholders, including our employees, consumers and customers, suppliers, cooperation partners, investors, local communities, governmental bodies and the society at large. The stakeholder engagement process was based on our mapping of the value chain, including all relevant parties in our upstream and downstream activities.

Based on the material topics and SASB sector specific impacts we have gathered insights on relevant stakeholders from all our subsidiaries, whose opinions were collected and analysed. The ways of approaching said stakeholder groups and topics of interest addressed are presented in the table below. During the stakeholder engagement, we have gathered valuable insights to our material topics and stakeholder expectations that align with our material topics. Furthermore, we have not identified any contradictions related to our material IROs and therefore there is no need to change our approach, strategy or business models. Both our group and company managements are informed on stakeholder opinions and acted upon if major changes affecting everyday operations should take place.

Stakeholder group	Why we engage	How we engage
<i>Employees</i>	<ul style="list-style-type: none"> <li>➤ Professional development</li> <li>➤ Sense of inclusion and well-being</li> <li>➤ Drive towards sustainability</li> <li>➤ Clear communication</li> </ul>	<ul style="list-style-type: none"> <li>➤ Performance development and open dialogue</li> <li>➤ Employee surveys</li> <li>➤ Open dialogue during social events</li> </ul>
<i>Customers</i>	<ul style="list-style-type: none"> <li>➤ Enable clients to address goals and targets</li> <li>➤ Understand impacts to customers</li> <li>➤ Support transition to more digital media</li> </ul>	<ul style="list-style-type: none"> <li>➤ Feedback from customers</li> <li>➤ Public perception and opinion</li> </ul>
<i>Investors</i>	<ul style="list-style-type: none"> <li>➤ Ensure accurate communication and shareholder value</li> </ul>	<ul style="list-style-type: none"> <li>➤ Formal engagement through the Annual General Meeting and quarterly reports</li> </ul>
<i>Suppliers and partners</i>	<ul style="list-style-type: none"> <li>➤ Revenue and growth opportunities</li> <li>➤ Sustainability performance</li> </ul>	<ul style="list-style-type: none"> <li>➤ Formal engagement through contracts and sustainability due diligence</li> <li>➤ Annual survey</li> </ul>
<i>Communities</i>	<ul style="list-style-type: none"> <li>➤ Promote independent and transparent media</li> <li>➤ Support transition to more digital media</li> </ul>	<ul style="list-style-type: none"> <li>➤ Through public and company reviews</li> </ul>

## Double materiality assessment process and results

### IRO-1 - DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

Similarly to the previous year, we conducted a thorough double materiality assessment to evaluate all impacts, risks and opportunities as described in the ESRS. Identified and evaluated IROs are outlined in the DMA process and further described under each topic reported on in the sustainability report. In general, material IROs are closely related to the core activities of our business model and the geographies we are present in and dispersed throughout the value chain, both upstream- and downstream. The DMA process involved relevant company representatives and the Group CFO, overseeing the DMA process and governing the necessary contribution as expected. The DMA results were verified by all company representatives, further confirmed by the CFO, who is responsible for the sustainability aspects across the Group. The final results of the DMA were informally presented to the Supervisory Board before conclusion.

### Mapping of IROs

The first stage of Ekspress Grupp’s double materiality process in 2024 involved preparing a list of sustainability-related issues based on the so-called “long list” included in ESRS 1 Appendix A, Application Requirements 16, an analysis of Ekspress Grupp’s business activities, and a review of industry reports, existing sustainability reporting standards and guidelines, as well as sustainability reports published by entities operating in areas similar to Ekspress Grupp sectors: digital media, printed media,

advertising screens and portals, tickets sales and events. The long list of topics considered for valuation was further refined to match the actual activities of our group companies based on their area of activities or sector specific aspects. As differences in IROs can be highlighted between different entities, no geographical distinction has been considered as our activities take place in the three Baltic states, that are similar in terms of daily operations and business landscape. While mapping the IROs based on our activities and the long list of topics, after mapping of relevant impacts, we have further considered potential risks and opportunities that are interconnected with these impacts and if they can have a material effect on both our entities and the group in general.

From an impact materiality perspective, a sustainability matter should be reported if it has a significant impact. This includes:

- the actual or potential, negative or positive impact of Ekspress Grupp on people or the environment in the short, medium, or long term. The impact is considered actual when it has already occurred, while it is potential when there is a likelihood of it occurring and
- the impact related to Ekspress Grupp's own business operations, its products and services, as well as through its business relationships, such as impacts arising from supplier activities.

From a financial perspective, a sustainability matter is considered material if it involves financial risks or opportunities that can reasonably be expected to have significant financial effects, impacting the organisation's financial position, financial performance, cash flows, access to financing, or cost of capital in the short, medium, or long term. When assessing these risks, Ekspress Grupp should consider not only its own business operations but also its business relationships with other companies.

The resulting list served as the basis for creating a catalogue of impacts (positive and negative, actual and potential), risks, and opportunities that, according to the Ekspress Grupp's management, selected stakeholders may consider relevant in the context of Ekspress Grupp's activities and its value chain.

The prepared list of impacts, risks, and opportunities – along with the sustainability-related topics assigned to it – was placed in a materiality assessment format for the further evaluation and materiality identification. The purpose of it was to enable Ekspress Grupp to assess the materiality of the impacts, risks, and opportunities based on beforehand established criteria that reflect the characteristics of the business. While we have in the mapping process considered the risks related to our general daily business activities, in 2024, the risks arising from sustainability related topics are considered and managed separately and have not yet been implemented in our general Group level risk assessment policy. Going forward, with the integration of sustainability risks into our existing framework, we will further consider the need to set levels of prioritisation.

## Time horizon and scope

In order to be able to forecast different aspects of sustainability performance, from immediate operational changes to strategic planning for long-term goals, each Ekspress Grupp's impact, risk, and opportunity from the "long list" was assigned to a relevant time horizon. By defining time horizons, ESRS enables companies to provide a more complete picture of how they are preparing for and managing sustainability matters, ensuring that their strategies are resilient, proactive, and aligned with broader sustainability goals.

Ekspress Grupp's time horizons are split into three categories and were identified for each topic in the "long list":

- short-term horizon covers the reporting year (0-1 year);
- medium-term horizon covers a period from one to five years (1-5 year);
- long-term horizon covers a period beyond five years (5+ years).

To enhance the evaluation of the topics and be able to estimate their progress over different time horizons, Ekspress Grupp also assessed each topic upon the question whether the topic will increase or decrease its materiality, also considering whether the topic could maintain its materiality and stay stable over different time horizons.

To ensure that sustainability reporting is accurate, meaningful, and aligned with stakeholder expectations, each impact, risk, and opportunity of Ekspress Grupp was assessed whether it concerns Ekspress Grupp itself, its entities, other entities within its value chain, or both. This relevance assessment is critical for both the quality and focus of the reporting process.

## Impact materiality assessment

We assessed each of the identified impacts based on the criteria outlined below. Each criterion allows for an assessment of the impact on a scale from one to five.

**Scale** – the assessment indicates how serious the negative impact is or how beneficial the positive impact is, taking into account the durability of the harm/benefit, as well as the compliance of our or a value chain entity’s actions or omissions with the law, and our policies and objectives.

**Scope** – the assessment indicates the extent of the impact, considering the area affected or the number of people or stakeholders impacted by the effect.

**Irreversibility** – assessed only for negative impacts, the evaluation indicates whether, and to what extent, the effects of the impact can be reversed.

**Probability** – the assessment indicates the likelihood of the impact occurring, taking into account our previous experience. The maximum rating is given to impacts whose occurrence in the future is certain, as well as to actual impacts.

After conducting an individual assessment of the impacts, the severity of each was calculated. This was done by taking the arithmetic average of the scores assigned to each impact under the relevant criteria (scale, scope, and irreversibility, or scale and scope). Then, the arithmetic average of the severity and probability scores was calculated for each impact, which represents the final impact score. Human rights related negative impacts were scored without taking into account probability unless including it would result in receiving highest score.

After evaluating all impacts, the arithmetic average of their final scores was calculated. The result represents the materiality threshold, and all impacts with a score equal to or greater than the materiality threshold were deemed material. The results of the evaluation were then assessed by the responsible representing person of each entity as well as the management.

## Financial materiality assessment

Each risk and opportunity were assessed based on two criteria, each allowing for a risk or opportunity assessment on a scale from one to three.

**Scale** – the assessment indicates the financial impact of the risk or opportunity, with financial thresholds for the evaluations set by the Company.

**Probability** – the assessment indicates the likelihood of the risk or opportunity occurring, considering the Company’s experience. The maximum rating is given to risks and opportunities whose occurrence in the future is certain.

After evaluating both criteria, the arithmetic average of their values was calculated, which represents the final risk or opportunity score. Then, the arithmetic average of all the scores was calculated, the value of which represents the materiality threshold. Risks and opportunities with a score equal to or greater than the materiality threshold were deemed financially significant.

To conclude the assessment, the identified IROs were validated with impacted stakeholders through methods described in the section “Interests and views of stakeholders” above. Final calibration of the material topics was done by the sustainability working group, consisting of the responsible person from each Group’s subsidiary and the Group CFO. As a result of the stakeholder engagement, there were no major deviations from the DMA results done in 2024. As a result of the final calibration by the Group companies, no major changes from the initial results were made and the sustainability working group concluded the accuracy and conciseness of the assessment, with the material topics reflecting Ekspress Grupp’s sustainability strategy related goals and targets. Going forward, the DMA is reviewed annually and expected to be updated as data and knowledge relating to certain IROs expand. The following table gives an overview of the 2024 DMA results, with each material topic, as well as more detailed descriptions of their associated IROs, are presented in the next sections across three categories, being Environmental, Social and Governance.

Topic	Topic name	Positive or negative impact, risk or opportunity	Own operations or value chain	Expected time horizon	Impact materiality	Financial materiality	Double material
<b>E1 Climate change</b>	Environmental impacts of products and services	Actual negative impact	Company and value chain	Short to long term	X		
	GHG emissions (scope 1-3)	Actual negative impact	Company and Value chain	Short to long term	X		
	Energy efficiency solutions	Opportunity	Company	Short and medium term		X	
<b>E4 Biodiversity and ecosystems</b>	Deforestation	Risk	Company and value chain	Medium and long term		X	
<b>E5 Circular economy</b>	Circular economy	Actual positive impact	Company	Short and medium term	X		
	Waste	Actual negative impact	Company	Short to long term	X		
<b>G1 Business conduct</b>	Responsible media, journalistic integrity and media pluralism	Actual positive impact, opportunity	Company	Short to long term	X	X	X
	Ethical leadership	Actual positive impact	Company and value chain	Short to long term	X		
	Whistleblowing activities	Actual positive impact	Company	Short and medium term	X		
	Stakeholder engagement	Actual positive impact	Company	Short and medium term	X		
	Competitive behaviour	Risk	Company	Short to long term		X	
	Responsible behaviour	Risk	Company and value chain	Medium term		X	
	Supply chain management	Risk	Company and value chain	Short to long term		X	

Topic	Topic name	Positive or negative impact, risk or opportunity	Own operations or value chain	Expected time horizon	Impact materiality	Financial materiality	Double material
	Collaboration with partners and supply chain	Opportunity	Company and value chain	Medium and long term		X	
	Responsible media	Opportunity	Company and value chain	Short to long term	X	X	X
	Intellectual property protection and media piracy	Risk	Company	Short to long term			
	Local regulations and guidelines	Risk	Company	Short to long term			
<b>S1 Own workforce</b>	Working time	Potential negative impact	Company	Short and medium term	X		
	Measures against violence and harassment in the workplace	Actual positive impact	Company	Short and medium term	X		
	Workforce diversity & inclusion	Risk	Company	Short to long term		X	
	Employee privacy & data security	Risk	Company	Short and medium term		X	
	Secure employment, employee recruitment and retention	Potential negative impact, risk	Company	Short to medium term	X	X	X
<b>S4 Consumers and end-users</b>	Customer data security and privacy	Potential negative impact, risk	Company	Short to long term	X	X	X

Based on our 2024 DMA, we have identified material IROs both for our company and our value chain across different time horizons. Most of the IROs are related to our business conduct and our employees. However, we have also identified IROs related to the climate change aspects of our own products, customer related potential impacts and risks associated with data security, as well as effects on biodiversity and circular economy.

### **SBM-3 - MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL**

Through Ekspres Grupp's 2024 double materiality assessment, we identified material IROs across our own operations as well as throughout our upstream and downstream value chain. The summary of material IROs can be found in the table above. The more detailed material topic description and its interaction with Ekspres Grupp's strategy and business model is further

described separately in each topical chapter below. The detailed description includes explanations of how and why the topics are material to the Group and how these IROs interact with our strategy, including the management of these IROs. As of 2024, there are no financial effects from material IROs anticipated to result in material adjustments to the carrying value of our assets and liabilities in the next annual reporting period.

As mentioned above, to ensure compliance with the CSRD and the Estonian Accounting Act, we have increased our resources from last year, with additional capacity arising from the use of external consultants and assurance providers. Similarly, the number of people working in this area at both from the Group and company level has increased. As our material IROs are related to our main business activities and ability to grow, our initiatives to improve opportunities and mitigate impacts and risks are partially included in our current established governance structures. We will take further action on enhancing our ESG governance, but based on 2023 and 2024 DMA results, our resilience is deemed high within the time horizons. Though the resilience assessment does not follow the ESRS requirements, we have based our opinion on qualitative input by external subject-matter experts, including an overall assessment of the mitigating factors in place across all IROs, as gathered in the DMA process.

## ENVIRONMENTAL INFORMATION

### ESRS E1 Climate change

#### E1 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

#### IRO-1 – DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL CLIMATE RELATED IMPACTS, RISKS AND OPPORTUNITIES

Although the environmental impact of the media sector is relatively limited compared to other sectors, climate and environmental impact management is essential for a sustainable and responsible company. We have mapped our material areas of influence in the environmental field during the creation of the ESG strategy, considering the supply chain, which significantly influences our overall environmental impact. The process of strategy creation and identification of areas of influence is described in more detail in chapters “Business model and strategy” and “Double materiality assessment results”.

The environmental impact of Ekspress Grupp is largely driven by printing processes - our companies publish newspapers, magazines and books. For online formats, monitoring energy sources used for infrastructure operation is key, along with assessing the environmental effects of energy consumption by digital media devices. 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 wastepaper.

Topic	Description	Positive or negative impact, risk or opportunity	Own operations or value chain	Expected time horizon
ESRS E1 Climate change	Negative impact related to the use of products and services offered: (i) digital media - energy use of suppliers & end users, hardware production; (ii) printed media - paper production, distribution; (iii) screens - technology production, energy use, end of life electronic waste; (iv) events - energy use, logistics, waste	Actual negative impact	Company and value chain	Short to long term
	GHG emissions (scope 1-3)	Actual negative impact	Company and Value chain	Short to long term
	Opportunity for cost reduction through energy efficiency measures in own operations	Opportunity	Company	Short and medium term

For E1 climate change, based on our 2024 DMA, we have concluded the actual negative impact of our resource usage needed for products and services offered. For example, the amounts of energy used in digital media creation and usage, both for our own operations and within the value chain have an effect on the environment. A similar situation is related to printed media – paper production as an energy intensive activity also affects the availability of natural woody resources, which if not managed properly, can lead to deforestation, described under chapter E4. From the other perspective, we have identified climate change related opportunity in the form of introducing energy-efficiency measures and activities, which decreases from one side our energy consumption but also the dependence on fossil resources. Climate action is highly important to our business for many reasons and is also one pillar of our ESG strategy to become a leading sustainable media company in the Baltics. Our ambition is to set the benchmark for sustainability topics in the media sector by reducing our environmental footprint, promoting responsible content creation, and driving positive change within our industry and community. In Ekspress Grupp,

we are committed to minimising our consumption and related impacts to the extent possible, including the gradual decrease in the number of printed media publishing, at the same time transitioning our business model and the end-users towards digital media consumption. Additionally, we want to adhere to and align with the ambitions and expectations of our business partners. Namely, based on the experience from previous years, we feel that as a leading media company in the Baltics, we can play an important enabling role in helping our partners in decarbonising their businesses.

In our 2024 DMA and related analysis, we have assessed the identified IROs, specifically evaluating potential climate-related risks or hazards. We consider our business model and current assets and locations to be exposed to a low degree of climate-related risks and assess our qualitative resilience to be at a high level. This valuation is based on assessment during the reporting period that activities considering our own operations are based in an urban environment, where climate impacts are relatively limited. Similar approach is considered for the main value chain partners (printing houses, home delivery) that operate in urban environments, where climate related risks are minimised. Based on our DMA analysis, we have not identified any climate related material physical or transition risks that would have a material effect on our operations that would cause us financial obligations or increased costs.

## Our approach and ambitions

### E1-1 TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

Currently, we do not have a transition plan for climate change mitigation, which would ensure our strategy and business model are compatible with (i) the transition to a sustainable economy and (ii) limiting global warming to 1.5 degrees in line with the Paris Agreement but have initiated work to assess how to best approach this, based on the full GHG disclosures established for 2024. However, as the qualitative resilience assessment for 2024 was based on the DMA process, we are further planning to conduct a climate scenario and detailed resilience assessment during 2025 to adopt the transition plan during the next reporting year.

### E1-2 – POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Our ESG strategy serves as a guiding framework for our sustainability efforts and outlines our commitment to environmental preservation, including the mitigation of climate change, use of renewable energy and optimised use of resources. Even though the ESG strategy covers our activities and plans for reducing our carbon footprint, as well as plans to manage risks and opportunities associated with climate change, it is not considered a separate policy document. Based on the existing ESG strategy, we are planning to create and implement an environmental policy, which will also include more detailed climate change mitigation and adaptation issues. The policy will be completed and rolled out in 2025 and will apply to all subsidiaries under Ekspress Grupp. The environmental policy creation will be led by the Executive Management, the CFO of the group and for a detailed assessment and to ensure coverage of all relevant topics. External consultants will be onboarded, who will work together with the sustainability working team (CEOs or responsible persons from each subsidiary). In creating the environmental policy, we will engage our biggest cooperation partners to identify also their needs and requirements towards us to ensure transparency. So far our ESG strategy as a guiding document has been part of our public annual report since 2022 and similarly, our developed climate policy will be made available for all interested sustainability statement users.

### E1-4 – TARGETS RELATED TO CLIMATE CHANGE MITIGATION

Media is among the industries with the lowest environmental impact, including climate impact. Our main environmental footprint is related to value chain impact of print media segment – paper sourcing and transport, printing, distribution, and end-of-life. However, we are aware that everything that concerns “digital” is the area with one of the fastest growing climate emissions – digital products and platforms, their energy consumption, networks and servers, additionally our network of screens. Looking forward, we currently do not anticipate significant increases in our climate change related impacts that would arise from expanding our operations. On the contrary, with media and advertisement moving towards more digitalised solutions due to end-user demand and our operations becoming more efficient and conscious towards environmental aspects, we expect our climate impact to decrease. In Ekspress Grupp, we have previously set separate goals under our ESG strategy for our GHG emission targets. These targets were initially set in 2022 with the development of our ESG strategy, accounting for the emission calculations for Delfi Meedia and Delfi Lithuania. Together with external sustainability experts, targets were set based on the potential GHG reduction for Delfi companies, that were further expanded to the whole Group. Based on this, we have set the general movement towards our targets which have not been developed in accordance with Science Based Targets:

- **Delfi Meedia (digital and print) to reduce the total greenhouse gas emissions 80% by 2030, compared to base year of 2020**
- **Rest of the Group (digital) to reduce the total greenhouse gas emissions by 2030 in line with Paris Agreement and Science Based Targets (from base year 2022) and reach net-zero emissions by 2050.**

Based on the 2024 assessment of our material topics and the disclosure points related to climate change mitigation, if needed we will further reconsider and re-evaluate the previously disclosed base year and any methodologies set for the existing targets during 2025. Updating of the base years for the GHG reduction is related to the continuous enhancement of data availability and level of detail in the GHG estimates, which has resulted inaccurate baseline values and therefore we do not disclose the current progress towards the previously set goals. As we currently do not have a dedicated environmental policy to provide guidance and monitoring the success of the set GHG reduction targets, we consider it not material to disclose current level of reduction reached due to the scope of GHG emission calculations provided in the segment below. In addressing our group and company level GHG targets, we refer to the total amount of emissions by the respective company in the country of operations and throughout own operations and the value chain as per GHG Protocol definitions. Though not currently guided by any policies, we still on a yearly basis monitor the achievements made in the absolute level of emissions and for internal purposes compare them with the previous years. Even though we have not set any clear short-term ambitions for the yearly valuation, we aim to indirectly monitor our progress towards our long-term goals.

## Our initiatives and progress

### E1-3 – ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE MITIGATION POLICIES

In order to decrease and minimise our negative impacts arising from greenhouse gas emissions and impacts related to the resource use for both digital and printed products and services offered, we have within our ESG strategy set both group and company level strategic initiatives that we will follow from 2025 onwards as we have identified the gaps during 2024. The targeted initiatives involve activities within our own company activities, considering the three Baltic States where we operate in. As far as stakeholder interests, as described in the Basis of preparation segment, we value our stakeholders’ voice and consider the opinions and interests to the extent when critical changes are needed. Based on 2024 engagement, no critical changes have been pointed out.

As we have set ambitious strategic initiatives for our climate change mitigation, we will further set priorities and timeline for the actions during 2025 together with our environmental policy. As we have not taken a structured approach to specific actions on a group level, selected subsidiaries have still taken initiative. For example Delfi Lithuania, Digital Matter and Geenius Meedia have shifted towards purchasing renewable energy, most of our offices have implemented green office practices, our printing partners use certified suppliers etc. Going forward, we are engaging more detailed in a structured approach to governing these steps and actions.

Even though actively engaging in sustainability matters requires additional time from our employees, our current estimate and knowledge is that we do not expect the need to allocate significant additional resources to take the next steps in our climate action plans, that goes beyond the need to involve external subject-matter experts and reorganise relevant employee work obligations.

Group level strategic initiative	Steps and actions to be taken (G-Group; C-Company)
<b>Set up proper and proportional approach for environmental and climate impact management and reporting</b>	<ul style="list-style-type: none"> <li>➤ (G) Climate change mitigation and adaptation policy.</li> <li>➤ (G) Agree and enhance group-wide approach and methodology for climate impact analysis (separate for print media and others).</li> <li>➤ (G) Set greenhouse gas reduction targets (in line with science-based targets / SBTi).</li> <li>➤ (G) Consider investor demands in disclosing climate related risks to Ekspress Grupp in line with Task Force On Climate-Related Financial Disclosures / TCFD (e.g paper sourcing, distribution, network disruptions).</li> </ul>
<b>Improve resource efficiency and mitigate climate impact in all companies</b>	<ul style="list-style-type: none"> <li>➤ (C) Map energy efficiency gaps and opportunities, and further improve energy efficiency in offices (electricity, heating, cooling).</li> <li>➤ (C) Purchase or produce renewable energy in all locations where possible, including data centres.</li> <li>➤ (C) Implement travel policy that lowers the impact of employee transportation.</li> <li>➤ (C) Implement green office programs in all locations (focus on energy, purchased materials, waste).</li> </ul>
<b>Systematically reduce life-time climate impact intensity of digital products</b>	<ul style="list-style-type: none"> <li>➤ (C) Set reduction measures and targets for digital product footprint (including collaboration with DIMPACT initiative).</li> <li>➤ (C) Agree and apply principles and guide for employees for environmental considerations in digital product development – measures that reduce energy consumption (or its impact on the climate) of servers, network, and user devices.</li> <li>➤ (C) Define and apply environmental criteria for 3rd party advertisements / banners.</li> </ul>

Group level strategic initiative	Steps and actions to be taken (G-Group; C-Company)
	➤ (C) Optimise data archive to reduce its environmental impact.
<b>Reduce environmental impact of print products</b>	<ul style="list-style-type: none"> <li>➤ (C) Use sustainable paper from certified sources (FSC).</li> <li>➤ (C) Agree and apply principles for environmental considerations / criteria in printing, transport, and distribution.</li> <li>➤ (C) Engage and collaborate with value chain partners (print, distribution) to find joint reduction opportunities in printing, distribution, end-of-life.</li> </ul>

## E1-5 – ENERGY MIX

As of 2024, we have fully assessed the Grupp's energy consumption following the similar principles as in the assessment of Scope 1, 2 and 3 greenhouse gas emissions. Ekspress Grupp's subsidiaries do not operate in sectors with a high climate impact within the meaning of ESRS: Sectors with a high climate impact are listed in the NACE sections A-H and L as defined in the Commission's Delegated Regulation (EU) 2022/1288. When assessing our energy consumption and also greenhouse gas emissions, financial control approach was used within the meaning of GHG Protocol and as defined in ESRS. In determining the energy mix figures, we have used the information gathered from all our subsidiaries within the scope. We have not made any further assumptions besides actual numerical data on energy consumption. A certain limitation that we are further planning to expand on is related to the level of detail for the data collected from our energy suppliers, which currently does not allow to disaggregate all relevant energy consumption by energy source. For the validation and verification of the calculations and the underlying results, we have not used external resources.

Energy consumption and distribution of energy sources	2024
Total fossil energy consumption (MWh)	2 853.7
<b>Percentage of fossil sources in total energy consumption (%)</b>	<b>70.6%</b>
Energy consumption based on nuclear sources (MWh)	0
<b>Percentage of nuclear energy in total energy consumption (%)</b>	<b>0%</b>
Fuel consumption of renewable sources (including biomass) (MWh)	0
Consumption of purchased or acquired electricity, steam and cooling based on renewable sources (MWh)	1 188.4
Consumption of self-produced renewable energy used for purposes other than fuel (MWh)	0
Total renewable energy consumption (MWh)	1 188.4
<b>Percentage of renewable sources in total energy consumption (%)</b>	<b>29.4%</b>
Total consumption of non-fossil non-renewable energy sources** (MWh)	0
<b>Percentage of consumption of non-fossil non-renewable energy sources in total consumption (%)</b>	<b>0%</b>
Total energy consumption (MWh)	4 042.1

## E1-6 – GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

The financial control approach was chosen as the consolidation approach to cover our operations of all entities in the Baltics under Ekspress Grupp, and no sources/facilities/operations were excluded from the calculation for categories that were covered in this year's analysis. As we follow in our consolidation the financial control scope, we do not include any joint ventures or associates in the calculations. Our climate impact was measured through global warming potential (GWP100) and expressed as metric tons of carbon dioxide equivalent (t CO<sub>2</sub>eq) which considers seven greenhouse gases covered by the Kyoto Protocol (carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>)).

The following sources were used to gather emission factors: UK Government GHG Conversion Factors for Company Reporting 2023, 2024, IPCC 2006, 2019, Estonian GHG footprint calculation model 2024 (Ministry of the Climate of Estonia), Lithuanian National Inventory Report 2024, Association of Issuing Bodies (AIB) European Residual Mixes 2023, The Big Climate Database, CarbonCloud ClimateHub, Ecoinvent v3.8, Exiobase v3.8.2, US EPA Supply Chain Factors Dataset v1.3, BEIS/DEFRA 2021 EEIO factor, academic papers, IEA Life Cycle Upstream Emission Factors, Enerdata, Lithuanian District Heating Association, Latvian Ministry of Climate and Energy.

There were no significant events or changes in circumstances relevant to our GHG emissions which impacted our reporting and for the validation and verification of the calculations and the underlying results, we have not used external resources.

Metric	2024
<b>GHG emission of Scope 1</b>	
Total GHG emission of Scope 1 (in CO2 equivalent tons)	266.1
<b>GHG emission of Scope 2</b>	
Location-specific measured total GHG emission of Scope 2 (in CO2 equivalent tons)	665.5
Market-specific measured total GHG emission of Scope 2 (in CO2 equivalent tons)	824.8
<b>Significant GHG emission in Scope 3</b>	
Indirect (Scope 3) total amount of total GHG emission (in CO2 equivalent tons)	6 573.2
1. Purchased goods and services	3 249.0
2. Capital goods	72.4
3. Activities related to fuel and energy (which do not belong to Scopes 1 or 2)	248.0
5. Waste generated in the course of operations	2.2
6. Business travel	146.9
7. Employees' commute to and from work	690.7
8. Upstream leased assets	369.1
9. Transport in subsequent stages of the value chain	1 481.8
11. Use of sold products	313.1
<b>Total GHG emission</b>	
Total GHG emission (location-based) (in CO2 equivalent tons)	7 504.8
Total GHG emission (market-based) (in CO2 equivalent tons)	7 664.2

Ekspress Grupp GHG emissions by country	Estonia	Latvia	Lithuania
Total GHG emissions (location-based) (in CO2 equivalent tons)	6 123.2	448.1	933.5
Total GHG emissions (market-based) (in CO2 equivalent tons)	5 934.0	816.5	913.7

Since 2022, we have reported on our scopes 1, 2 and 3 emissions. In our efforts to improve data quality and the total scope of our emissions, we expanded our scope 3 reporting to include majority of the categories in 2024, including more detailed waste collection, products and services, business travels, use of end products, including the footprint of digital products and downstream transportation for paper media deliveries due to the sustainability push and improved data collection abilities of our collaboration partners.

### Scope 1

Our scope 1 emissions derive mainly from fuel used by company owned cars. In total, as we do not generate any electricity or heat on site in our offices, the total scope 1 emissions make a minor proportion of our total GHG amounts (3.5%). The year developed as expected and with increased activity across all group entities, there was an increase in our Scope 1 emissions. Going forward, we will consider implementing opportunities in our Environmental Policy to mitigate our scope 1 emissions.

### Accounting principles

Scope 1 greenhouse gas emissions refer to the direct emissions from sources that are owned or controlled by an organisation. Direct GHG emissions comprise the sum of greenhouse gases, which are converted to CO<sub>2</sub> equivalents. The emissions arise from the combustion of fuel products related to use of vehicles. To calculate GHG emissions, we have used the Estonian Ministry of Climate's latest emission factors and UK Government's conversion factors which are widely used in greenhouse gas emissions calculations.

### Scope 2

Our scope 2 accounts for electricity and heating for our group company offices located in the three Baltic countries.

### Accounting principles

Scope 2 greenhouse gas emissions refer to the indirect emissions resulting from the generation of purchased energy that is used by an organisation. Scope 2 emissions occur at the facility where the energy is generated, thus being classified as indirect emissions. The emissions are linked to the electricity and district heating consumption related to Ekspress Grupp and its subsidiaries' office activities.

Scope 2 market-based Emissions are calculated by taking the specific energy sources an organisation uses for its purchased electricity, heat, or steam. Renewable energy purchases and guarantees of origin are considered when accounting for indirect GHG emissions using the market-based approach in some of our offices where renewable electricity is used.

Renewable energy certificates - Certificates for purchase of renewable energy are only used as documentation if a GO/cancellation statement is either in hand or a signed letter of intent assuring the arrival of such a statement is present at the time of reporting. To calculate GHG emissions, the 2022 version of the AIB country specific residual mix has been used for our entities. Scope 2 location-based Emissions are calculated by taking the specific energy sources an organisation uses for its purchased electricity, heat, and steam and using average emission factors for the national energy grid for each Baltic country separately. This method reflects the energy mix within the specific area of consumption and does not consider any purchase of renewable energy or credits. To calculate GHG emissions, the latest version of the country factors has been used.

### Scope 3

Our scope 3 accounts for the indirect emissions from our value chain, including activities both in our upstream and downstream value chain. Based on the categories of scope 3 and the activities of our value chain partners, we have not identified any biogenic emissions arising from our scope 3. In total, gross scope 3 emissions make up the majority of our 2024 emissions as our own operations are limited to office activities. Compared to 2023, we have included all companies and their activities under Ekspress Grupp and a significantly wider base of Scope 3 categories covered in the calculations. In 2024, our scope 3 reporting includes the following nine categories:

**1 Purchased goods and services** include GHG emissions associated with the Group's purchase of goods and services and are calculated as the direct cost including VAT or the amounts purchased associated with a specific type of product or a service, multiplied by a matching emission factor either on a direct-spend-based or item-based emission factors. The direct cost has been converted to EUR using the average annual exchange rate to align with the currency used in the spend-based emission factors.

**2 Capital goods** include GHG emissions associated with the Group's additions to tangible assets and are calculated as the specific type of item, multiplied by a matching emission factor from available sources, like product specific EPDs or average values of the purchased products.

**3 Fuel-and-energy-related activities** include emissions derived from the direct and indirect emissions reported under scope 1 and 2 and the development is therefore directly linked to these two emission categories.

**5 Waste generated in operations** include GHG emissions of waste generated in from the disposal and treatment of waste produced by a specific company's operations. The GHG emissions are calculated using actual waste data from each company's annual statistics derived from information provided by waste management company.

**6 Business travel Emissions** include GHG emissions arising from our employees travelling to different countries or other locations as part of their work obligations. Emissions calculated are based on data collection on the locations and distances travelled during 2024.

**7 Employee commuting** include GHG emissions from our employees travel to work and home. In 2023, we conducted an employee survey on our employees' commuting habits. As there have not been significant changes in the number of employees in the group and considering the total amount of employees, we see no significant changes compared to previous years. The employee questionnaire included answers for the average distances and type of commute used by our employees, multiplied with a respective emission factor.

**8 Upstream leased assets** include GHG emissions from leased assets by the undertaking company, for example IT equipment. For the calculations, we have included the number of leased assets and their lease type and used the relevant emission factor.

**9 Transport in subsequent stages of the value chain** include GHG emissions related to transportation activities of products before they are sold. As for our physical printed media products we are using direct data from our transportation partners Omniva and Lehepunkt on the distances travelled and fuels used.

**11 Use of sold products** include GHG emissions from the use our digital products. For the calculation a robust methodology has been used with broadest system boundaries possible to represent a comprehensive GHG footprint. The calculation includes the energy usage of data centres, energy usage by networks for data transfer and energy used by end-users interacting with a product or service. Each system segment is further broken down into two categories — operational and embodied emissions. This is done by first looking at the energy used by devices during their manufacturing and operation. These energy figures are converted to emissions by then multiplying them by a grid intensity factor. We have included only operational emissions calculations, though we provided the assessment of embodied emissions separately. To estimate operational emissions, first, we define the energy consumption intensity. To do so, we look at the global energy consumption

for each segment, as well as total data transfer. By dividing the energy consumption by the total data transfer, we get the energy intensity based on data transfer for each.

### Scope 3 categories - not material or relevant

The following categories are not relevant to our business model or activities or are constrained by data availability:

**4 Upstream transportation and distribution** – Upstream transportation is relevant to the materials delivery for the printing houses, but due to non-uniform data availability, we have excluded the category and are further looking at enhancing data collection and disclosure in the next reporting period.

**10 Processing of sold products** – Our sold products are not intermediate products and are not used for further processing and is therefore not material.

**12 End of life treatment of sold products** – All our unsold newspapers are collected by a waste management company and recycled (Read more about in chapter E5).

**13 Downstream leased assets** – The category has been valuated as non-material, as we do not act as a lessor.

**14 Franchises** - The category has been valuated as non-material, as we do not operate franchises.

**15 Investments** The category has been valuated non-material as the level of investments is limited, and the associated scope 3 emissions are minimal.

## Data hierarchy

The reported environmental performance follows the data hierarchy principles: 1 - Actual consumption directly stated on the invoice from the vendors; 2- Data supplied by the vendor open request through written communication; 3-Data through vendor online portal or similar.

## Emissions intensity

Ekspres Grupp does not participate in regulated emissions trading systems and does not apply internal carbon emission plans. For the GHG intensity based on net revenue has been calculated as gross scope 1, scope 2 location-based/market-based, and gross scope 3 emissions divided by reported net revenue in thousand euros, that can be found in the consolidated annual financial statements in the section “Consolidated statement of profit or loss and other comprehensive income”. For the validation and verification of the calculations and the underlying results, we have not used external resources.

GHG intensity based on net revenue	2024	Comparison period	% change 2023/2024
Total GHG emissions (location-based) per net revenue (tCO <sub>2</sub> e/EUR thousand)	0.099	-	-
Total GHG emissions (market-based) per net revenue (tCO <sub>2</sub> e/EUR thousand)	0.1	-	-
Total net revenue (thousand euros)	76 170	-	-

## Taxonomy related activities of AS Ekspres Grupp

The Taxonomy Regulation sets out specific requirements and technical screening criteria for economic activities that would contribute to the 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, Ekspress Grupp's reporting according to the EUR taxonomy regulation is based on the climate act.

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

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

- 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. Ekspress Grupp and its subsidiaries organise public events in the form of sports events, theatrical performances and similar entertainment activities.
  - "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 2024 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.
  - During 2024, Ekspress Grupp did not evaluate the potential impact of climate risks, especially related to specific economic activities as listed in the Taxonomy regulation. Additionally, Ekspress Grupp did not implement adaptation solutions as the eligibility has not been evaluated. Moreover, while organising events, companies adhere to local laws and standards but have not accounted for climate change adaptation targets nor do they track in detail whether these activities "do no significant harm". Based on the above justification, the economic activity at hand cannot be considered as taxonomy aligned or eligible as all substantial contribution criteria have not been met.
- Creating content or acquiring the right to distribute content and subsequently broadcasting that content, such as radio, television and data programs of entertainment, news, talk, and the like, including data broadcasting, typically integrated with radio or TV broadcasting that corresponds to the activity outline in the climate act 11.1, Programming and Broadcasting activities (NACE J60), which is an activity supporting adaptation to climate change according to the Climate Act. Ekspress Grupp's three subsidiaries operating under the Delfi brand have one line of activities related to Delfi TV, which includes broadcasting of multimedia content, including news, talks and similar.
  - Creating audio-visual content is in the core of Ekspress Grupp's main media activities, however climate risks related to this activity have not been evaluated during 2024. As during the reporting year, the impact of the underlying activity on the environmental goals cannot be determined, the activity is not considered as taxonomy aligned or eligible.

- During 2025, Ekspress Grupp will conduct the climate scenario and risk assessment that would allow for a further evaluation of the above Taxonomy activities and their substantial contribution to the listed criteria.

## 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 aim of implementing the ESG strategy is, in addition to following the guidelines and principles, to also initiate the implementation of the necessary due diligence process and its compliance.

## Contextual information

### Sales revenues:

Sales revenue 76 170 thousand comprises of total Group revenue from its financial accounts in the income statement as well as in sales revenue in Note 21.

- Creative, arts and entertainment activities (NACE R90) – the Group organises both public and internal events, as described above. During the reporting period, taxonomy eligible but not aligned makes up 0% of the Group's total revenue.
- Motion picture, video and television programme production, sound recording and music publishing activities (NACE J60) – Group companies Delfi Meedia AS (Estonia), AS Delfi (Latvia) and Delfi UAB (Lithuania) create, publish and broadcast audio-visual content. However, due to the Group's accounting policy, revenues of the three subsidiaries operating under the Delfi brand are pooled into a single subscription for the end-consumers and no distinction between audio-visual content and written news and articles can be reasonably made. Therefore, no justifiable assumptions on the actual consumption can be made based on the revenue composition. As a result, taxonomy eligible, but not aligned revenue makes 0% of the Group's total revenue.

### Capital and operating costs

Operational costs of 66,451 thousand euros represent the sum of the lines "Cost of goods sold", "Marketing expenses", "General and administrative expenses" and "Other operating expenses" in the income statement, from which depreciation expense has been deducted.

Capital costs 7 531 thousand euros include IFRS 16 contracts, derived from the statements of movements in fixed assets.

- Creative, arts and entertainment activities (NACE R90) – the Group organises both public and internal events, as described above. During the reporting period, taxonomy eligible but not aligned operating costs make up 0% of the Group's total OPEX. No capitalised investments for the Taxonomy eligible activity were made during the reporting year. As the Taxonomy classification of activities is directly linked to the primary activities of the Group and its subsidiaries, the Capital and Operational costs do not include the rental costs and agreements (leases) from IFRS 16 (office space, land under advertisement screens) in the Taxonomy calculation as it is not part of the underlying Taxonomy activities of Creative, arts and entertainment activities or Motion picture, video and television programme production.
- Motion picture, video and television programme production, sound recording and music publishing activities (NACE J60) – Group companies Delfi Meedia AS (Estonia), AS Delfi (Latvia) and Delfi UAB (Lithuania) create, publish and broadcast audio-visual content. Operating costs include purchased items from image banks for TV production, vodcast production costs, stream and broadcast production costs, including rights, technical implementation etc; additional software licensing required for TV production and payments made to private individuals. During the reporting period, taxonomy

eligible, but not aligned operating costs make up 0% of the Group's total OPEX. Capitalised investments under the activity are related to the upkeep of Delfi TV platforms, considering the investments that would not have been made, if no broadcasting or other activities would be done on the platforms. Total taxonomy eligible, but non-aligned CAPEX makes 0% of the Group's total capital investments.

### Proportion of turnover from products or services associated with Taxonomy-aligned economic activities in 2024

Economic activities	2024			Substantial contribution criteria						Proportion of Taxonomy aligned (A.1.) or -eligible (A.2.)
	Code	Turnover, EUR' 000	Proportion of turnover %	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular Economy	Biodiversity	
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>										
<b>A.1. Environmentally sustainable activities (taxonomy-aligned)</b>										
<b>A.1. Environmentally sustainable activities (taxonomy-aligned) total</b>	-	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which enabling		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which transitional		0	0.00%	0.00%						0.00%
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)</b>										
13.1. Creative, arts and entertainment activities	CCA 13.1	0	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
13.3. Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3	0	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) total</b>		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
<b>TOTAL (A.1 + A.2)</b>		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>										
<b>Taxonomy-non-eligible activities (B)</b>		76 170	100.00%							
<b>TOTAL (A + B)</b>		76 170	100.00%							

## Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities in 2024

Economic activities	2024			Substantial contribution criteria						Proportion of Taxonomy aligned (A.1.) or -eligible (A.2.) CapEx, 2023
	Code	CapEx, EUR' 000	Proportion of CapEx %	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular Economy	Biodiversity	
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>										
<b>A.1. Environmentally sustainable activities (taxonomy-aligned)</b>										
<b>A.1. Environmentally sustainable activities (taxonomy-aligned) total</b>	-	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which enabling		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which transitional		0	0.00%	0.00%						0.00%
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)</b>										
13.1. Creative, arts and entertainment activities	CCA 13.1	0	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
13.3. Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3	0	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) total</b>		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
<b>TOTAL (A.1 + A.2)</b>		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>										
<b>Taxonomy-non-eligible activities (B)</b>		7 531	100.00%							
<b>TOTAL (A + B)</b>		7 531	100.00%							

## Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities in 2024

Economic activities	2024			Substantial contribution criteria						Proportion of Taxonomy aligned (A.1.) or -eligible (A.2.) OpEx, 2023
	Code	OpEx, EUR' 000	Proportion of OpEx %	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular Economy	Biodiversity	
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>										
<b>A.1. Environmentally sustainable activities (taxonomy-aligned)</b>										
<b>A.1. Environmentally sustainable activities (taxonomy-aligned) total</b>	-	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which enabling		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Of which transitional		0	0.00%	0.00%						0.00%
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities)</b>										
13.1. Creative, arts and entertainment activities	CCA 13.1	0	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
13.3. Motion picture, video and television programme production, sound recording and music publishing activities	CCA 13.3	0	0.00%	N/EL	N/EL	N/EL	N/EL	N/EL	N/EL	0.00%
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not taxonomy-aligned activities) total</b>		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
<b>TOTAL (A.1 + A.2)</b>		0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>										
<b>Taxonomy-non-eligible activities (B)</b>		66 451	100.00%							
<b>TOTAL (A + B)</b>		66 451	100.00%							

## EU Taxonomy proportions per environmental objective

	Proportion of turnover/ Total turnover		Proportion of CAPEX / Total CAPEX		Proportion of OPEX / Total OPEX	
	Aligned	Eligible	Aligned	Eligible	Aligned	Eligible
CCM	-	-	-	-	-	-
CCA	-	-	-	-	-	-
WTR	-	-	-	-	-	-
CE	-	-	-	-	-	-
PPC	-	-	-	-	-	-
BIO	-	-	-	-	-	-

## ESRS E4 Biodiversity and ecosystems

Based on our 2024 DMA process, we have identified one relevant material risk for Ekspres Grupp companies and value chain, which has a potential of realisation in the medium and long term related to deforestation. We have not identified any material negative impacts with regards to land degradation, desertification or soil sealing nor does any of our activities in our geographical locations affect any endangered species.

Across all our core activities (digital media, ads, events and printed media) paper consumption in printed media has the largest impact on the businesses. Almost half of the emissions for Delfi Meedia AS and other printed media companies like Geenius Meedia OÜ and Hea Lugu OÜ come from printed media and paper/ink consumption, which accounts for the largest portion of these emissions. With the significant use of paper in our main categories, there is a potential risk arising from regulatory aspects related to deforestation and use of natural resources for paper production – which can have several negative outcomes for Ekspres Grupp, especially related to our sustainability aspects, reputation, supply chain disruption and other aspects. While material topic, due to the fact of it being high upstream in our value chain, we have not collected data from our value chain nor conducted consultations with affected communities.

Topic	Description	Positive or negative impact, risk or opportunity	Own operations or value chain	Expected time horizon
<b>E4 Biodiversity and ecosystems</b>	Deforestation	Risk	Company and value chain	Medium and long term

Published back in 2023, the new EU Deforestation Regulation (EUDR) impacts the whole book and printed media publishing industry, with challenges regarding transparency of the deeper supply chain and complex information management, e.g. sourcing of paper and paper products, mapping of the supply chain and main suppliers and their certification. The primary risk for Ekspres Grupp companies lies in the potential additional costs for the publishers as a result of changes to their processes. Verifying the supply chain, conducting due diligence, and ensuring that paper is sourced from certified sustainable forests might lead to higher paper prices, which could impact production costs for books, magazines, and other printed materials, which essentially needs to be transferred to the end-user.

As none of our companies in the Baltics are directly linked with the risk due to the nature of our operations, the material risk of deforestation on biodiversity and ecosystems can affect our Group financially due to increased costs, but the actions leading to the potential risk take place high up in the value chain. Due this, we have decided to gradually phase-in the disclosures of data related to our upstream value chain to the extent possible.

As the risk described is high up in our value chain and we acknowledge the potential risk that can cause increased costs for our operations, we are already considering changes in our strategy and business model to make it more resilient. Even though we have not conducted a separate resilience analysis, as both a printed and media news company, we have acknowledged the consumer’s demand towards more digital and less printed media, which is the reason we have gradually started to decrease the number of printed media outlets and are continuing with these activities every year, based on the reader numbers of our subsidiaries’ outlets. By gradually changing our business model towards more digital solutions, we are decreasing the risk of higher costs and material availability arising from paper production to our company.

### Transition plan, policies and considerations of biodiversity and ecosystems in our strategy and business model related to our actions

As we do not currently have a transition plan or any policies in place to minimise risks related to biodiversity impacts, both our digital and printed media segments are related to the topic and are also emphasised in our environmental strategy. As described later in section G1, we continuously emphasise our collaboration partners’ and suppliers’ progress towards ESG related activities, including their due diligence, sustainable value chain management, we select our partners and raw materials used based on certification and their processes. For example, as defined in our environmental actions, we emphasise and have set specific activities to use sustainable paper from certified sources and are planning to further agree and apply principles for environmental considerations / criteria in raw materials sourcing. Only by carrying out these activities and selecting our suppliers based on their actions and criteria, we are able to minimise the risk realising for the Group companies.

As in our business model and recent years' developments, we are less and less focusing on printed media and moving towards fully digital products and services. From one aspect it is within our business model and strategy to cater to the needs and demands of our customers and with our end-users shifting towards more digital content with less printed media used, we are planning to phase out certain printed outlets during 2025, continuing with further phase-outs of printed media in 2026. As we currently do not have any targets set for deforestation and its effects on us, as mentioned we are continuously paying attention to the aspect by monitoring the changes in regulations related to the use of wood-based paper and using suppliers who adhere to environmental standards and use certified raw materials. As discussed later in section G1, we are planning to further enhance our ESG value chain monitoring systems and approaches in selecting suppliers and will increasingly address the underlying topic in our environmental policy.

## ESRS E5 Circular economy

Based on our DMA analysis done during 2024, we have identified a material actual positive impact and an actual negative impact that is related to our actions. As a positive impact, in all our companies, we emphasise the efficient use of resources including reuse of all paper products, some parts of digital out-door screens and the related equipment, sustainable procurement decisions, responsible waste management practices etc. As in our Group we produce physical newspapers and magazines, it is within our responsibility to also emphasise circular economy principles to our readers and we therefore expect our end-users to act and behave according to similar principles we have set within the Group.

Topic	Description	Positive or negative impact, risk or opportunity	Own operations or value chain	Expected time horizon
<b>E5 Circular Economy</b>	Circular economy	Actual positive impact	Company	Short and medium term
	Waste	Actual negative impact	Company	Short to long term

As far as printed product related activities are within our control, we continuously emphasise the circularity of paper and minimisation of waste creation due to our products. Based on our practices, all of the printed products that were unsold in time in retail stores are gathered and directed to recycling by providing them to Eesti Keskkonnateenused, who is responsible for waste management and directs the paper products back to papermills to be recycled into paper products that can be re-used by printing houses and other manufacturers.

In addition to our physical products, we emphasise green office practices in all our locations, with special focus on resource usage and waste management. All our offices collect waste set by local principles and guidelines, and we make sure these principles are followed by all employees. As Ekspress Grupp is also responsible for public physical advertisements and entertainment and creative event organisation, we have witnessed a negative impact arising from waste created during events and waste management in advertisement segments due to the high use of plastic products and packaging. In the case of a paper newspaper or a magazine, a positive contribution is made if the reader shares it with family members or colleagues and later recycles it as wastepaper.

### Our policies, targets and actions related to circular economy

In Ekspress Grupp, we currently do not have a separate policy related to circular economy, but as we are planning to develop our Group level environmental policy during 2025, circular economy aspects, including our principles of enhancing recyclability and circularity of our products will be covered. Additionally, organisation of events by re-using existing materials is encouraged. In addition to circularity and waste of our products, waste management principles will be described to be implemented by all our locations.

Even though all our locations and offices already follow waste management guidelines, these will be more formally documented and outlined in our policy. As mentioned above, 100% of our physical unsold copies of newspapers, magazines and books are diverted to recycling, however we will further in the environmental policy bring out the importance of end-user behaviour, including sharing of physical products and the correct actions to direct wastepaper into recycling.

We have not identified any material targets relevant to disclose, however we are monitoring our proportion of printed materials unsold in retail that are directed to reuse, we are planning to further evaluate and set more detailed targets related circularity and waste during 2025.

Continuing in 2024, we have already largely stopped issuing invoices on paper. We have minimised the quantity of printed marketing materials, and our subsidiaries mostly use reusable materials, props and equipment when organising events. Going forward, we will continue rolling out our centralised approach to waste management processes within our offices and educating the end-users on how to responsibly handle our printed media products by shared use and proper waste management.

## Resource inflows

As Ekspress Grupp's main economic activity is related to printed and digital media creation, but the Group outsources all printed media products, including newspapers, magazines, books and printed marketing materials, we have not considered any of the resource inflows material to our activities. We have collected data and information from our main printing houses on the amount of paper used, but due to unavailability of all relevant data, we do not disclose information on the amount of paper used.

## Resource outflows

Similarly to resource outflows, we as Ekspress Grupp do not own any production facilities and all our activities are related to digital and printed media content creation and advertisement creation. We monitor the number of newspapers and magazines produced (in pieces) and the number of unsold products and the proportion taken for reuse.

In terms of our products' durability, typically newspapers are relevant for a limited amount of time, for which the consumer uses the product to be informed and up to date about our everyday life. We have not exclusively assessed the lifetime of a daily newspaper, but publications that have more general not time-constraint information have a longer lifetime and can be consumed multiple times – same goes for majority of our newspaper publications that are published once a week and focuses on different types of content. Given their recyclability, the newspapers and magazines can be fully recycled and directed into reuse by paper companies and due to the nature of a printed media product, newspapers and magazines do not require a separate packaging, which allows to further save the amount of plastic packaging used. In recycling unused products, we rely on the activities of the waste management company and derive the amounts of unused products from our downstream value chain, who is responsible for the product sales and collect information on the number of unused products. In disclosing information about the unused products diverted to recycling, we have not made any additional assumptions on the methodologies and the number has not been further validated by an external party.

Number of printed but unsold media product copies	2024
Delfi Meedia AS	962 278
Geenius Meedia OÜ	108 320
... of which directed to reuse	100%

## Waste

As our main activities are related to digital and printed media content creation and almost all our daily operations are office related in terms of outsourced products, waste generated in our operations is related to only waste created in the offices. The waste created is more important from the downstream value chain perspective, i.e related to our printed media products and their end-of-life treatment. While we promote the reuse of our newspapers and magazines by multiple people and the proper recycling approaches, the waste created is currently out of our reach. At present, we do not have a complete overview of total waste generated due to limited data availability from our waste management operators and suppliers, mainly related to the treatment type of collected waste. As waste tracking relies on external reporting, we are working closely with our partners to enhance data collection and improve transparency.

To address this, we are implementing a structured engagement plan with waste service providers in 2025 to ensure more accurate and comprehensive data reporting. This includes refining contract requirements, setting up standardised reporting templates, and integrating waste data into our internal systems. We anticipate providing a more complete overview on resource outflows and waste in Ekspress Grupp's 2025 Sustainability Statement.

## SOCIAL INFORMATION

**In our social aspects, we have set the goal of providing a professional environment for our employees that is inclusive and supportive, allowing to create the value for our end users through responsible media publications.**

### ESRS S1 Own workforce

#### S1-SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

In Ekspres Grupp, we have over 950 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 for quality media content.

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 and additional employee benefits, but also on the open and inclusive organisational culture, development opportunities and the comfortable working environment we offer to employees. That is why we continuously contribute to creating a motivating work environment and invest in our employee's well-being and competences.

<i>Topic</i>	<i>Description</i>	<i>Positive or negative impact, risk or opportunity</i>	<i>Own operations or value chain</i>	<i>Expected time horizon</i>
<b>S1 Own employees</b>	Working time	Potential negative impact	Company	Short and medium term
	Measures against violence and harassment in the workplace	Actual positive impact	Company	Short and medium term
	Workforce diversity & inclusion	Risk	Company	Short to long term
	Employee privacy & data security	Risk	Company	Short and medium term
	Secure employment, employee recruitment and retention	Potential negative impact, risk	Company	Short to medium term

All the companies in our Group 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.

All our employees, both permanent and temporary employees, self-employed (freelancers and contractors) may be exposed to different impacts due to our wide variety of operations, as shown in the table above. During our DMA assessment, we further evaluated specific groups and characteristics of employees who are at risk of the impacts based on our previous knowledge

and real-life examples that have taken place among our employees. As majority of the identified IRO topics are potential negative impacts due to the nature of the industry or risks arising from the market competition, we thrive towards minimising these potential negative impacts and risks to turn them into opportunities for Ekspres Grupp in the long run.

The main challenges include risks related to working time and security and privacy of journalists coming from the media sector specifics where journalists are facing threats from the wider public and additional risks in the form of high competition among media houses both on a national and regional level. We prioritise diversity, gender equality, equal pay, and inclusion among our employees, which allows us to better control the variety of activities in multiple sectors. As an actual positive impact created to our employees, we prioritise measures against violence and harassment to create a safe and supportive environment. Social dialogue, freedom of association, employees' rights, and collective bargaining are essential for bringing diverse perspectives about our activities to light.

We recognise training and skills development as essential, investing in our employees' growth and performance for their benefit, society's, and the success of our activities. By actively investing in the development of our employees and involving them in our sustainability related matters, we also aim to mitigate any potential negative impacts or risks that might arise from addressing our material environmental topics, excluding potential impacts arising from the transition plan created in the next reporting, as described in our Environmental Disclosure chapter. Understanding the importance of health and safety, we are committed to continuously developing safe and suitable working environment and providing several health and other benefits to our employees, including sports and mental health compensation, health insurance and regular health controls. Although not a material topic for our subsidiaries or countries of operation, we are consciously dedicated to actively preventing forced and child labour within our company and our value chain by using trustworthy cooperation partners and suppliers.

As described above in the Strategy section, we have previously developed the social strategy, focusing on three key pillars. The focus of the Group's HR area is mainly influenced by digitisation, creating synergies between business areas and continuing to make internal processes more efficient. The following section gives an overview of our commitments and strategic activities towards our social topics, covering employee development, well-being and diversity and engagement. While we have not yet updated our social strategy related to the material IROS or set measurable targets for our social topics, we have set strategic goals that we are pursuing. Based on this, we are planning to further develop specific strategic targets during 2025.

ESG strategy: personal and professional development of employees	
<b>Ambition</b>	<ul style="list-style-type: none"> <li>➤ We are a leading employer in the media sector in all three Baltic States.</li> <li>➤ We create conditions and actively offer opportunities for personal and professional development.</li> <li>➤ We support employees in adapting to the changing media landscape, especially in developing digital competence.</li> </ul>
<b>Target</b>	<ul style="list-style-type: none"> <li>➤ Personal learning and development plans are drawn up for all employees.</li> </ul>
<b>Strategic activities</b>	<ul style="list-style-type: none"> <li>➤ We create a group-wide leadership development programme.</li> <li>➤ We create employee development programs/talent academies in all subsidiaries.</li> </ul>

ESG strategy: health and well-being	
<b>Commitment</b>	<ul style="list-style-type: none"> <li>➤ We ensure a working environment that supports the health and well-being of employees, where employees can fulfil themselves.</li> </ul>
<b>Target</b>	<ul style="list-style-type: none"> <li>➤ We maintain a high score for employee satisfaction (eNPS).</li> <li>➤ Zero occupational health damage cases.</li> </ul>
<b>Strategic activities</b>	<ul style="list-style-type: none"> <li>➤ We continuously improve/enhance employee well-being and satisfaction.</li> <li>➤ We ensure a healthy and safe working environment, taking into account both physical and mental health and well-being.</li> <li>➤ We enable and promote work-life balance.</li> </ul>

ESG strategy: diversity and engagement	
<b>Ambition</b>	➤ Equal treatment, diversity and engagement characterise all companies and organisational culture of Ekspress Grupp.
<b>Target</b>	<ul style="list-style-type: none"> <li>➤ Ekspress Grupp has no gender wage gap (separate target under diversity and engagement, but not a material topic).</li> <li>➤ To achieve compliance with the European Union directive on gender balance in business leadership.</li> </ul>
<b>Strategic activities</b>	<ul style="list-style-type: none"> <li>➤ We recruit and retain diverse talent.</li> <li>➤ We engage employees and ensure an open organisational culture.</li> <li>➤ We guarantee everyone equal opportunities for career development within the company.</li> <li>➤ We pay employees equal, competitive and decent wages.</li> </ul>

**S1-1 OUR POLICIES ON SOCIAL TOPICS**

In Ekspress Grupp and its subsidiaries, we have implemented measures and policies aimed at the protection, development and well-being of our employees from any threats arising from our own operations or aspects in the value chain. As a group level policy created by the management, it is each subsidiary’s responsibility to follow and implement the principles. In order to decrease the realisation of potential material impacts and mitigate the risks, we adhere to our Code of Conduct and several other internal entity-specific guidelines. We have in place policies and guidelines on occupational safety like regular health controls, first-aid provision and ways of working, including ways of sitting behind a table, taking rest breaks etc. These methods allow us to manage and minimise any material impacts and risks related to our employees. We also regularly include our employees in decision making and governance process, by enabling them to share opinions either via satisfaction surveys, NPS surveys or through open dialogue with direct supervisors and heads of departments.

For years, we have been using Ekspress Grupp’s Code of Good Corporate Governance (Hea ühingujuhtimise tava), which is based on both national and international guidelines and principles, including the Estonian Financial Supervision and Resolution Authority’s Code of Good Corporate Governance, OECD Guidelines for Multinational Enterprises, International Labour Organisation, UN Guiding Principles on Business and Human Rights and Equal Treatment Act. Through our Code of Conduct, we are committed to following the internationally recognised guidelines. Within our Code of Conduct, which sets the principles of behaviour and reaction to incidents, among other aspects, like encouraging openness, diversity and inclusion, we explicitly address the issues such as human trafficking, forced labour, compulsory and child labour, discrimination based on age, gender, race, skin colour, nationality or ethnic origin etc. Media industry employees are exposed to hate speech, public criticism towards the “messengers”, possible aggressions, safety threats in conflict areas, regular negative news and crisis in the society, long and unusual working hours, we have set our principles in our Code of Conduct to battle these aspects and ensure that no harm is being done to our employees and that the well-being and satisfaction is ensured. As our Code of Conduct currently does not directly manage our material IROs related to employment security, retention and working time, we are planning to further expand on the principles as described below.

This makes us focus on stress prevention, mental health, and safety and security of our employees. Post-COVID working habits make many people work from home which requires even more attention to work-life balance, well-being and mental health matters. In occupational health and workplace ergonomics we aim to comply with official requirements and provide decent workplace. Even though we currently do not have a group-wide separate policy for working time, home-office policy, accident prevention policy, health and safety policy, policy for promoting equal opportunities for employees or policy against discrimination and harassment and have not changed principles in our Code of Conduct in 2024, we plan to in detail evaluate the contents of said document that cover these topics and assess further need to develop group-wide principles in 2025 on these aspects that would serve as an input to entity specific policies.

Another potential material risk we have identified is related to the employee privacy and data security. 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. Some of our subsidiaries like Delfi Meedia and Geenius Meedia bears all the costs in the case of personal court proceedings. Given the rapidly growing role of the Delfi brand 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. For the protection of data and ensuring compliance to international regulations, we have developed our Security Policy and GDPR Policy. The purpose of the Security Policy is to establish the main principles of conduct that are to govern Ekspress Grupp to ensure the effective protection of people, of hardware and software assets and critical infrastructure, and of information, as well as of the privacy of the data processed, ensuring a reasonable level of security, resilience and compliance is achieved.

## **S1-2 ENGAGING WITH OUR PEOPLE**

In Ekspres Grupp, our approach to engagement with our people encourages collaboration and dialogue, both directly with our own workforce via our employee engagement surveys as well as indirectly with workers' direct supervisors. As our companies mostly work in smaller teams, allowing managers to easily monitor and improve the microclimate. On the Group level, we have implemented employee engagement surveys that are managed centrally by the HR unit. Through the engagement we highly value and consider our employees' perspectives and opinions and take immediate action if needed. The employee feedback survey is conducted once per year and covers a wide range of topics related to life in Ekspres Grupp. Questionnaire is sent to all group employees, with the aim to obtain a high response rate to adequately address all potential topics and hear opinions. We have not taken extra steps to gain insights into the perspectives of our people who may be particularly vulnerable but encourage our people to openly communicate their opinions if they deem it necessary. The questions in the annual survey address areas such as team collaboration, goal clarity, work-life balance, the company's future prospects and brand identity. In 2024 we also conducted a more detailed employee engagement survey for the validation of our DMA results to understand the potential IROs we have identified on a Group level and as seen by the employees to ensure the opinions of employees are accounted for when taking action on our sustainability matters and material results clearly communicated.

The engagement survey results are taken by each team manager within their organisational unit or through organisation-wide initiatives coordinated by our HR department. This serves as the most effective way of openly communicating any changes and also give our employees the certainty, that their opinions are accounted for, if any actions take place. We highly value an open work culture and discussion, and in addition to managers holding regular one-on-one conversations with employees and performance assessment processes, opinions can be shared openly during regular daily communication. If any issues or topics need wider attention, they are escalated to the relevant responsible persons.

## **S1-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OUR WORKFORCE TO RAISE CONCERNS**

Employees who experience discrimination or harassment are encouraged to seek support, while leadership has a duty to report any such cases they witness or are notified of. Reports of misconduct can be submitted by the victim directly to their direct supervisor, the HR department or through our whistleblower system, which guarantees confidentiality and protection of the person notifying. We continuously ensure that all employees are informed about the available grievance mechanisms through onboarding and encourage the use of the channel if needed, indicated in internal communications and ensuring that every report is handled anonymously.

Read more about our whistleblower platform in the Governance section.

Based on recent years' experience, there have not been many notifications made through the whistleblower channel (thirteen, six and five instances in 2022, 2023 and 2024 respectively). The number of reports and the fact that no violations were further investigated, leads to the conclusion that no major instances have taken place, and employees are more likely to turn to the HR department or their direct supervisor, which confirms the high score of our internal engagement survey. As the total number of incidents has been low over the years, we have not yet separately evaluated the effectiveness of said notification channels, mechanisms and processes.

## **S1-4 MANAGING IMPACTS ON OUR PEOPLE**

Our policies, procedures, and processes serve as the foundation for our actions to prevent potential negative impacts and risks and foster positive outcomes and opportunities. These frameworks help us identify and implement actions to address potential negative and positive impacts on all employees within the Group. By conducting regular assessments and incorporating feedback from employees through channels such as our annual engagement surveys, daily open dialogues between employees, and formal HR channels, we ensure that our efforts align with their needs and contribute to a supportive and inclusive workplace. These channels and actions we implement are managed and monitored regularly by each entity's HR department or person.

We aim to ensure that our practices do not cause or contribute to negative impacts on our workforce by following our principles and procedures as we continuously work to address and mitigate risks related to our employees and align our efforts with our employees' including security, working time, diversity and equality. Diversity, equality and inclusion (DEI) are essential for a company to ensure long-term success. For the media sector, DEI forms a foundation of high-quality journalism and working environment as it helps to ensure the inclusion of various opinions. As mentioned, going forward to 2025, we are continuously enhancing the processes and implementing new procedures related to our material IROs, like monitoring the effectiveness of our actions to better manage the positive impacts and working environment of our company employees and

preventing risks and potential negative impacts from materialising. For improvement of said procedures, no significant additional resources are needed, but a clear management decision that is based on the current as-is situation and analysis results that allow for the HR responsible people to engage on the actions.

### S1-5 TARGETS RELATED TO SOCIAL TOPICS

Although we have not set specific measurable and time-bound targets besides qualitative descriptions, we continuously evaluate our initiatives and their impacts at appropriate management levels as part of our business conduct. We have set KPIs to be measured for topics like personal and professional development, well-being, including safety, health and work-life balance and DEI, but we have not set any underlying targets or goals related to these metrics, which we will further develop during 2025, with the Group-wide implementation of our ESG governance practices. Despite that, our established processes are anchored within the functions that have day-to-day responsibility for ensuring adherence to our policies, in addition to our continuous engagement channels and channels to raise concerns. This decision reflects our commitment to strategic focus and industry-specific priorities.

### S1-6, S1-9, S-12 CHARACTERISTICS OF OUR EMPLOYEES

In connection with the first ESRS-compliant report, for employee related metrics, we will consider 2024 as the first reference year, based on the results of which further goals will be set, related to promoting positive impacts on the workforce, mitigating negative impacts, and managing significant risks and opportunities. The goal-setting process will be disclosed in the 2025 Consolidated Sustainability Statement. The following employee characteristics show average number of FTE throughout the year.

Number of employees	Estonia		Latvia		Lithuania	
	M	F	M	F	M	F
Number of permanent employees	210	296	55	86	118	198
Number of temporary employees	43	44	-	-	8	10
Number of non-guaranteed hours employees	-	-	-	-	-	-
Total average number of employees	963					
Number of self-employed people	34					
Number of trainees	67					

In classifying our employees, we adhere to the following definition in all our locations of operation:

Permanent employees have an open-ended employment contract, whereas temporary employees work with a fixed-term employment contract or physical persons with contract of services. Self-employed employees include people with contracts with the undertaking to supply labour. Different employment types are a common approach in the industry and geographies we operate in and depends on specific position and function the employee fulfils. On a Group level we define management as positions that are two levels below the administrative management and supervisory bodies, which may differ between our subsidiaries. Mainly this includes heads of relevant departments and for example in digital media companies also segment Editors in Chief.

Employee characteristics	Estonia		Latvia		Lithuania	
	M	F	M	F	M	F
Employees under 30	52	69	8	15	18	59
Percentage of employees under 30	12.56%		2.39%		7.99%	
Employees aged 30-49	124	165	44	60	86	121
Percentage of employees aged 30-49	30.06%		10.8%		21.49%	
Employees over 50	34	62	3	11	15	17
Percentage of employees over 50	9.95%		1.45%		3.32%	
Total average number of FTEs	963					
Persons whose labour is provided by entrepreneurs whose main activity is labelled as "employment activity"	0					
Number of employees with disabilities	5					
Percentage of employees with disabilities subject to data collection restrictions	0.52%					
Employees at management level	53					
Including women at management level	22					
Percentage of employees at management level	5.5%					
Share of women in management	41.5%					

During 2024, 184 employees left the Group either voluntarily or non-voluntarily, which makes the workforce turnover 24%. The workforce turnover calculation uses the number of employees at the beginning and the end of the reporting period of all people who have worked in the Group and the number of voluntary and non-voluntary leavers. On average, the Group employed on average 963 people, with a minor decrease from 2023. The average number of employees used for sustainability disclosures is linked to the average number of FTEs depicted in the Consolidated Financial Statement Note 25.

Due to legal restrictions under the EU General Data Protection Regulation (GDPR) covering all EU member states and EEA countries, as well as similar principles of personal data protection through national legislation we are unable to adequately report on the number of persons with disabilities within our organisation.

### S1-13 TRAINING AND SKILLS DEVELOPMENT

Training and skills development	Male	Female	Not specified
Number of employees participating in performance review process, covered with personal learning and development plans	143	257	226
Percentage of employees participating in performance review process	37.17%	44.42%	N/A
Total number of training hours received during the period	8 876	13 186	N/A
Average number of training hours per person	23.08	22.78	N/A
Number of performance reviews per employee	0.65		

Training hours are defined as time spent on training and skills development. Training and skills development involves various methodologies such as on-site training, online courses, workshops, certification programs, educational opportunities, pop-up courses, and adherence to a Code of Conduct. It does not include our trainee programmes, the development of courses, or the time instructors spend teaching. Training hours per employee and by gender are calculated by dividing the total recorded training hours in by the headcount for each gender. This calculation is based on the reporting period and includes all

employees in headcount within Ekspres Grupp, excluding freelancers and contractors. For the validation and verification of the calculations and the underlying results, we have not used external resources.

The percentage of employees participating in performance appraisals is calculated using the total employee headcount from the employee characteristic disclosure as the denominator. A regular performance review is defined as a review based on criteria known to the employee and his or her superior undertaken with the knowledge of the employee that takes place once per year. The company managements have not set a specified number of required performance assessments for employees. This rate includes employees who are not eligible for appraisals but are part of the total headcount. Therefore, the disclosed rate cannot reach 100% because it does not account for eligible employees participating in appraisals, as all employees in the excluded categories are recorded as non-participants.

#### S1-14 OCCUPATIONAL HEALTH AND SAFETY

Metric	2024
Number of days lost to (i) work-related injuries and (ii) fatalities from work-related accidents, (iii) work-related ill health and (iv) fatalities from ill health	0
Rate of days lost to (i) work-related injuries and (ii) fatalities from work-related accidents, (iii) work-related ill health and (iv) fatalities from ill health	0.0%
Number of absent days (including lost days and absence due to sickness)	3 535
Rate of absent days (including lost days and absence due to sickness)	1.45%
Number of work-related accidents / injuries	0
Total hours worked (by all employees) during the period	1 422 053
Rate of work accidents / injuries	0.0%
Number of work-related ill health cases	2

As majority of our companies' activities take place in office spaces, our workplace cannot be characterised by frequent work-related injuries, as the nature of our work does not impose heavy physical activities on our employees. All our employees are covered by our health and safety management system. In 2024, we recorded no occupational fatalities among our employees. For the validation and verification of the calculations and the underlying results, we have not used external resources.

#### S1-15 WORK-LIFE BALANCE

Metric	2024
Standard for working time (working days for period) per FTE	252
Total hours worked (by all employees) during the period	1 422 053
Share of employees exceeding 48 hours of work per week	1.04%*
Share of employees entitled to take family-related leave	100%**

\* Currently, only Delfi Meedia collects a detailed view on employees working time

\*\* Currently, our approach and methodology does not allow to centrally cover and distinguish metrics related to taken family related leave and only the total estimate is available

We ensure that our employees are entitled to take family-related leave in accordance with employment terms and conditions described in employee handbooks and contracts. We are aware of the media industry's and journalists' need to work at times more than required at unusual hours. While we currently do not have a centralised approach or methodology to collect the information for all reporting entities, we are developing our internal systems and approach suitable to collect such information and have a clear overview of our work-life balance related metrics. For the validation and verification of the calculations and the underlying results, we have not used external resources.

**S-17 DISCRIMINATION INCIDENTS REPORTED AND COMPLAINTS FILED**

Metric	2024
Number of registered incidents of discrimination within the company or by competent authorities through a formal process	0
Number of complaints filed through channels for people in own workforce to raise concerns	0
Number of complaints filed to National Contact Points for OECD Multinational Enterprises	0
Amount of material fines, penalties, and compensation for damages as a result of violations regarding social and human rights factors	0
Number of severe human rights issues and incidents connected to own workforce	0
Number of severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	0
Amount of material fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce	0

As described above in the policies sections, our Code of Conduct sets the behavioural principles and condemns any discrimination as defined by UN Guiding Principles on Business and Human Rights and Estonian Equal Treatment Act.

We address all discrimination incidents and complaints filed within our organisation through formal channels. Given the sensitive nature of these matters, we do not disclose details about the incidents. Each report or complaint is handled with the highest level of confidentiality. Read more about our whistleblower platform in the Governance Disclosure.

## ESRS S4 Clients and end-users

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. Based on our 2024 DMA assessment, the only material topic, related to clients and end-users, which can pose a potential negative impact and is a risk related to customer data security and privacy, which can further materialise if no preventive measures and actions are in place.

The risk to Ekspres Grupp is related to personal data leakage, cyber-attacks and similar hindering events, which in turn can lead to reputational damage. As Ekspres Grupp is a high public interest media company, who is responsible for providing the wider audience with quality and transparent news, any occurrences of data leaks or safety-related violations mean direct reputational damage, which in turn can affect turnover due to customers’ loss of trust and potentially lead to fines. Beyond our own operations, such incidents could have a broader repercussion on the general public and society, causing disruption in lives and societal ripple effects. Our consumers demand reliable services and the protection of their personal data in accordance with the requirements of the GDPR. The protection of customer data is an important part of our responsibility, which is directly related to all our consumer groups rights to privacy. We emphasise the topic of human rights in the context of our end-users and clients through ensuring the proper mechanisms on data protection but have not committed to the topic yet through our specific policies.

As data security and privacy is relevant for all members of the public and all our consumers, regardless of their location, age or other characteristics, we have not taken further steps to gain insights to specific end-user characteristics and we consider the risk equally relevant for all. To emphasise the material IRO, we continuously engage our clients, end-users and stakeholders with the aim to identify valuable insights on the views and interests of the stakeholders, which are relevant for our general strategy and business model. Additionally, these opinions help us evaluate our commitment and progress towards the initiative, giving us a better understanding how to tailor the activities and approaches related to customer data security and privacy.

<i>Topic</i>	<i>Description</i>	<i>Positive or negative impact, risk or opportunity</i>	<i>Own operations or value chain</i>	<i>Expected time horizon</i>
<b>S4 Clients and end-users</b>	Customer data security and privacy	Potential negative impact, risk	Company	Short to long term

With increasing digital consumption of news, we prioritise the protection of our readers' personal data, payment information, and browsing behaviour by adhering to data protection regulations, ensuring transparency in data collection, processing and storage, allowing end-users to manage cookies, opt out of targeted ads and control their personal information. While data privacy our priority, we also aim to make quality journalism accessible to all by offering different formats and access to our content. Even though accessibility is not a material topic individually, it is considered as an important part of our customer journey and data security and privacy.

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.

ESG strategy	
<b>Ambition</b>	<ul style="list-style-type: none"> <li>➤ 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.</li> </ul>
<b>Target</b>	<ul style="list-style-type: none"> <li>➤ Zero violations of personal data protection requirements.</li> <li>➤ Access is ensured to all our media content, taking also into consideration the needs of people with special needs.</li> </ul>
<b>Strategic activities</b>	<ul style="list-style-type: none"> <li>➤ We ensure the protection and privacy of subscribers' and customers' data, and use data in accordance with the law.</li> <li>➤ We ensure the protection of the rights and well-being of readers/subscribers.</li> <li>➤ We develop the availability of media content on all platforms.</li> </ul>

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.

**Our policies**

We have developed initial guidelines for the customer experience policy across the Group and will update them throughout 2025 based on feedback from subsidiaries and industry trends. The aim of the policy is to further mitigate the risks and impacts related to end-user data privacy and implement clear rules and guidelines that each group company must follow through a standardised approach. We plan to fully adopt, implement and disseminate the policy to all our Group subsidiaries by the end of the year. In addition, we have multiple policies, including our Code of Conduct, GDPR Policy and Security Policy in place dealing with mitigating the potential impacts and avoiding risks. Our Code of Conduct sets the behavioural norms for our employees and Group companies to adhere to minimise the potential negative effects.

In addition, our existing GDPR Policy from 2021 and Security Policy from 2023 establish the main principles of conduct that are to govern Ekspres Grupp its companies and employees to ensure the effective protection of people, of hardware and software assets and critical infrastructure, and of information, as well as of the privacy of the data processed, ensuring a reasonable level of security, resilience and compliance. While we have not included the end-users directly in setting the policy, we address the importance of GDPR and data security for our clients and end-users indirectly. Despite not having any violations of security and data privacy, we can see the effectiveness of our policies and procedures in place and as we have not updated our policies during the reporting year, we are planning to revisit the underlying documents with the standardised approach to group level customer experience policy to match the expectations set in standards of internationally recognised guidelines and conventions related to end-user data security, privacy and human rights.

**Our targets**

While we have set targets related to clients' and end-consumers' rights and interest, we are further developing our approach to measuring the impacts, including a thorough internal reporting process on matters related to both customer privacy and data security and media accessibility. In 2024 we have set the following group level targets to all our companies across our geographies for the upcoming year of 2025, which we will monitor annually compared to the base year of 2023:

- Zero breaches of clients' and end-users' personal data collection
- 100% of content covered by accessibility features

Metric	2023	2024	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

Metric	2023	2024	Target for 2025
Percentage of digital content covered with availability measures from total media content*	80-100%	90-100%	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

## Our activities

In order to further develop our strategical targets related to end-users' data privacy and accessibility to media content, we are planning both on a group and company level implement the following activities:

- Adopting personal data protection/ usability policy in line with GDPR
- Adopt user safety policy/ principles regarding media content
- Adopting policy/principles on targeted/ behavioural messaging and advertising to protect consumers' rights to access to (quality) information
- Adopting a policy regarding critical content that must be made available for everyone

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. Based on the Group level strategic activities, companies are expected to continuously implement the following activities:

- Renewing and updating data protection systems regularly
- Regular data protection trainings for all relevant employees
- Providing users with simple and transparent ways to control how their data is being used
- Identifying the need for and adopting, specific accessibility features/tools/accessible formats: e.g. Option to listen to the content, audio description, video subtitles, sign language etc. (WCAG)

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. As we have not had any negative impacts to our clients with regards to security and data privacy or human rights, we have not had the need to develop nor currently have mitigation measures or engage our end-users with relation to potential impacts or human rights but rather have collected feedback from them. Feedback is collected by all companies in direct contact with the customers on a regular basis 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 and Geenius Meedia monitor customer satisfaction with all paid content. Other media companies of the Group also regularly organise 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.

### S4-3 PROCESSES TO REMEDIATE IMPACTS AND CHANNELS TO RAISE CONCERNS

We have established methods and procedures for all steps connected with developing and maintaining our digital news outlets, including the process for managing and remediating a material negative impact on consumers and end-users.

During 2024, no serious human rights issues or incidents involving consumers and/or end users have been reported to the Group. Our consumers and end-users have various channels to raise concerns. They can contact us through our any of our public contact page or e-mail. The contact information for all companies is available online on their respective websites. As described further in the section G1 below, we also have a third-party whistleblower channel, that allows consumers and end-users to raise concerns anonymously. The Group assesses the measures taken to manage significant impacts as no significant potential impacts on consumers and/or end users have materialised in the recent years. If needed, the remediation of significant negative impacts will depend on a case-by-case basis and there is no group-wide policy or integration to the existing risk management in this area yet.

In the case of media content, our goal is to support openness and participatory democracy and to deal with topics related to 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.

- **Digital solutions:** we facilitate the availability of services by creating innovative digital solutions that are accessible also to people with special needs.
- **Public news blogs:** We ensure that critically important content is available to everyone, including non-subscribers.
- **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.

We guarantee the safety and privacy of our users through our set policies and procedures and ensure accessibility for different stakeholders beyond statutory obligations. We address the leak of GDPR-sensitive data by immediately discontinuing the activity that caused the incident and restricting access to the exposed content. The problem is then analysed to identify the root cause and to delete the exposed data. The Group has a Data Protection Officer whose task is to inform and advise the Group and its subsidiaries on data protection rights and obligations. The Data Protection Officer actively participates in resolving issues related to the protection of personal data and ensures that the organisation's employees have the necessary knowledge skills and policies to process personal data in an appropriate manner.

## GOVERNANCE INFORMATION

### ESRS G1 Business Conduct

#### G1-SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

In this section, we provide disclosures on governance related topics including our general policies on governance and business conduct, as well as the topics on partnerships, anti-corruption and payment practices.

Correct and ethical business conduct is essential to Ekspress Grupp’s business model, the majority of which is dependent on our own workforce and workers within our value chain. As we operate in all three Baltic countries, compliance with relevant legislation and international guidelines on ethical business conduct is a priority due to the potential legal and, subsequently, economic consequences of non-compliance.

Enhanced focus and monitoring on these topics help to minimise misconduct, which in turn impacts our ability to reach our goals regarding the maintenance of an efficient, competent business and workforce. A correct and ethical corporate culture, designed to protect the stakeholders and employees from human rights impacts, intellectual property and media piracy and whistleblowers who report on these or any other issues, is not only strictly governed by legal procedures, but is also highly important for our strategy and commercial targets.

Topic	Description	Positive or negative impact, risk or opportunity	Own operations or value chain	Expected time horizon
<b>G1 Business conduct</b>	Responsible media, journalistic integrity and media pluralism	Actual positive impact, opportunity	Company	Short to long term
	Ethical leadership	Actual positive impact	Company and value chain	Short to long term
	Whistleblowing activities	Actual positive impact	Company	Short and medium term
	Stakeholder engagement	Actual positive impact	Company	Short and medium term
	Competitive behavior	Risk	Company	Short to long term
	Responsible behavior	Risk	Company and value chain	Medium term
	Supply chain management	Risk	Company and value chain	Short to long term
	Collaboration with partners and supply chain	Opportunity	Company and value chain	Medium and long term
	Responsible media	Opportunity	Company and value chain	Short to long term
	Intellectual property protection and media piracy	Risk	Company	Short to long term
Local regulations and guidelines	Risk	Company	Short to long term	

As part of our strategic vision and goal is to be a responsible and attractive employer and also regional leader in the industry, we have identified several IROs under business conduct, that are relevant for both our operations and also our value chain. As these IROs in part are covered by multiple aspects, we have further aggregated the IROs into several topics: Ethical business conduct, Responsible media, Intellectual property and Media piracy, Supply chain management and Competitive behavior.

### G1-1 BUSINESS CONDUCT AND CORPORATE CULTURE

In Ekspress Grupp, we take responsibility for our business operations. As a large, listed enterprise, we have significant influence in the society, and thus the credibility and impeccable reputation of all group entities must be consistently upheld. We promote financially, ecologically, socially and culturally sustainable development both in our own operations and as part of the broader industry, and we also promote the characteristics of corporate responsibility in the industry, such as the reliability of media content and digital services, environmental responsibility and promoting freedom of speech.

The role and responsibility of media is to bring relevant and challenging themes to the public. Coverage of social challenges highlights processes requiring change to achieve positive outcomes.

Ekspress Grupp assumes a Group-wide role and accountability for driving impactful changes that support sustainable development, particularly in alignment with the UN Sustainable Development Goals. To serve the public interest, 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.

ESG strategy	
<b>Ambition</b>	<ul style="list-style-type: none"> <li>➤ 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.</li> <li>➤ We want to contribute to the development of the media sector more broadly in order to maintain and promote the good level of media freedom in the Baltic States.</li> <li>➤ Our ambition is to be a leading reporter of sustainability issues in the Baltics.</li> </ul>
<b>Target</b>	<ul style="list-style-type: none"> <li>➤ Publications of Ekspress Grupp do not publish unethical or irresponsible information.</li> <li>➤ Zero violations of Ekspress Grupp's journalism code of ethics (in preparation).</li> </ul>
<b>Strategic activities</b>	<ul style="list-style-type: none"> <li>➤ We actively work to ensure that our journalistic content is independent, ethical and of high quality.</li> <li>➤ We contribute to the development of media literacy and information literacy in cooperation with relevant stakeholders.</li> <li>➤ We connect publications with socially material focus themes and create and develop media platforms focused on sustainability topics.</li> </ul>

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.

Responsible governance and ethical business conduct is an industry-agnostic issue that every large company must address. For Ekspress Grupp, it is our utmost duty to ensure regulatory compliance, ethics, transparency and integrity in governance matters. This applies to all our employees, with the greatest focus on members of leadership bodies and other employees who

can make, or influence decisions related to our stakeholders. Any mistake or vagueness in responsible governance might seriously impact our credibility as a media house.

## Our Code of Conduct

We have created, adopted, and communicated company specific internal policies which aim to foster a corporate culture of responsible business conduct throughout our organisation as a media company. At the core of this corporate culture lies our Code of Conduct, which prescribes compliance with applicable legislation and describes the ethical standards and values we are committed to upholding and encouraging. The consolidated nature of our Code of Conduct reflects our approach to achieving effective policies and to ensure that all relevant topics for ethical behaviour and corporate culture are covered.

In creating our Code of Conduct, we have adhered to and aim to reflect the ethical standards of internationally recognised guidelines and conventions such as the OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights and the UN Declaration of Human Rights, as well as local legislation when applicable. Our Code of Conduct is publicly available and is communicated to our own workforce through an onboarding process.

The principles outlined in the Code of Conduct set also expectations to our partners and stakeholders in our value chain with the aim to raise awareness and create leverage in terms of upholding sustainability standards. To decrease the amount of documentation created and to ensure that all relevant ethical standards and topics are covered for our stakeholder in a centralised location, our Code of Conduct among other things includes principles on media integrity and pluralism, anti-corruption behaviour, protection of intellectual property and media piracy, collaboration with partners.

The Code of Conduct is supervised by the Executive Management and the Board of Directors and is amended when needed. Going forward, this is done considering the results of the sustainability due diligence processes and the DMA, including in response to any significant IROs identified within the value chain.

## Supplier relationship management

In Ekspress Grupp, we are committed to practising fair behaviour in our management of suppliers and cooperation partners. Significant part of our environmental impact comes from our value chain. To manage this impact, we must consciously choose our suppliers and service providers as well as 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 served as an important first step and we have continued our efforts to expand these criteria during the last year. As our activities cover multiple different sectors throughout the value chain, in 2024, we have started to increasingly prioritise our suppliers' commitment towards ESG matters. During 2024, Delfi Meedia assessed their suppliers' activities towards ESG and on a Group level, we are planning to commit to the assessment 2025. As we do not currently have a specific policy document for supplier engagement, relationship or procurement, we aim to develop and disseminate it during 2025, which going forward allows us to create a better understanding of our value chain partners and the necessary criteria our suppliers need to meet in terms of environmental, social and governance aspects, but also general engagement with business relationships.

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, adhering to both environmental and social topics.

## Prevention of misconduct

In 2024, we continued to promote an open and transparent management culture. Throughout our companies, 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 to firstly mitigate the probability of ill-behaviour incidents and secondly to solve them efficiently. Corruption and bribery cases are dealt by following the principles of the UN Convention against Corruption and the Estonian Anti-corruption Act, 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. There are no set guidelines or rules for the members as part of the committee, but depending on the case it can include the related person's direct supervisor and the member of the board of the respective company. Any cases of corruption

or suspicion of ill-behaviour will be communicated to the respective management board member and considering the severity of the case can escalate the issue to the group's management board.

While we have multiple people as part of the group and each subsidiary's management and other relevant employees like journalists and marketing people among others, who can be considered as at-risk functions, we have not in detailed implemented a centralised approach to mapping the specific positions of functions at risk nor conducted Group wide centralised additional trainings on anti-corruption and bribery that go beyond the guidelines on behavioural principles, outlined in our Code of Conduct. Considerations for at-risk functions falls currently under the responsibility of each subsidiary and trainings are conducted as deemed necessary, due to which the figures presented below are an underestimation of the actual situation.

At-risk positions and anti-corruption training	2024
Total number of employees at risk	452
Number of employees at risk who have taken the training	236
Share of employees at risk in respect of corruption/bribery covered by anti-corruption / anti-bribery training programme	52.2%

In 2024, there were no cases of corruption at Ekspres Grupp. Throughout the year, we dealt with minor violations of business ethics through the Press Council. As here, in Ekspres Grupp, we value our people and employees, any accusations on misconduct towards specific people will be supported by the underlying media house in solving the case. As mentioned before, in many cases a mutual agreement was reached or the case rejected. In the case of minor violations, additional business ethics trainings are reinforced and in more severe cases, warnings issued to the employees. In 2024, two warnings were issued related to our Code of Conduct.

Data protection	2023	2024	Target for 2026
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

Incidents that are in conflict with the principles of business ethics or other values of Ekspres Grupp can be reported through the group-wide anonymous notification channel. To ensure confidentiality, the notification channel is managed by an external partner (WhistleB). The regulation of the whistleblower policy is guided by our Code of Conduct, which sets the boundaries and opportunities for the use of said channel. If an incident is reported, notifications are sent over an encrypted connection and are password-protected. All reports of misconduct are handled with utmost confidentiality, and we do not condone any retaliation or countermeasures against individuals who submit a whistleblower report. In 2024, 6 notifications were submitted there, but during the processing of the complaints, it became clear that the accusations were unfounded, and further investigation was not needed.

Corruption and bribery incidents	2024	2023
Number of convictions for violation of anti-corruption and anti-bribery laws	0	0
Fines for violation of anti-corruption and anti-bribery laws (EUR)	0	0

In determining the metrics relevant for corruption and bribery, we have not made any assumptions but base on the numerical data gathered by our group data protection specialists who is the responsible person for the whistleblower channel. Additional metrics include convictions and fines of our group entity by a court of law, determined during the reporting year. For the validation and verification of the calculations and the underlying results, we have not used external resources.

## G1-6 PAYMENT PRACTICES

Our standard payment terms are 30 days, with some subsidiaries having longer or shorter terms. We have not set a centralised group policy nor terms for the payment practices as the companies are present in different sub-sectors and countries and have the freedom to set their own policies. Due to the same reason, we do not have a centralised policy for late payments that is focused on SMEs. On average, 90% of all the payments are aligned with the said terms or other negotiated terms. Prolonged supplier negotiations or lost invoices have affected the proportion of aligned payments negatively. In 2024 there were 22 cases where an overdue payment resulted in a minor fine for our subsidiaries. In total, 3 800 EUR were issued as fines to our media

and advertisement companies. Minor deviations of late payment were solved with fines, and we have not been involved in any legal proceedings related to late payments.

Payment practices	2024	2023
Average days of payment to suppliers	26	21
Percentage of payments aligned with agreed terms	91.5%	93.46%
Fines for late payments (EUR)	3799	3640

The average number of days for payments to suppliers are done before or after the due date is calculated by determining the difference between the due dates and the payment dates for all invoices paid within the year across our companies. The share of payments aligned accounts for the payments that have been made on the given terms, dividend by all payments made. If for some overdue payments fines have been issued, the monetary amount is extracted from the internal accounting and data collection systems. For the validation and verification of the calculations and the underlying results, we have not used external resources.