

PRINCIPLES OF ETHICS AND EXPECTATIONS FOR PARTNERS

1 Introduction

- 1.1 The principles of ethics and expectations for partners of the Port of Tallinn (hereinafter **the principles of ethics**) determine the requirements that apply to all partners and third parties of Port of Tallinn Ltd and group companies (hereinafter **the Port of Tallinn**) who have a contractual relationship with the Port of Tallinn or cooperate with the Port of Tallinn (hereinafter **the partner**).
- 1.2 The Port of Tallinn has undertaken to comply with a number of international guidelines regarding human rights, labor laws, the fight against corruption, environmental responsibility, personal data processing, and imposing sanctions. We strive to follow the guidelines and principles of the International Labor Organization (ILO) core conventions, the UN Guiding Principles on Business and Human Rights (UNGP), and the international guidelines for countries of the Organization for Economic Co-operation and Development (OECD). The code of ethics of the Port of Tallinn is available on the company's website.
- 1.3 The Port of Tallinn cooperates with partners who share our ambitions and commitment to sustainability and agree to cooperate with us in a transparent manner, even if the cooperation stipulates higher standards than those required by regulatory requirements.
- 1.4 The Port of Tallinn expects its partners to accept and follow the principles of ethics in their business activities both in their organizations around the world and by applying them in their supply chains. Partners undertake to conduct their business in compliance with all relevant national and international laws on topics such as, but not limited to, human rights, environmental protection, working conditions, and anti-corruption.

2 Principles

- 2.1 **Working conditions and employee rights.** The partner must ensure high-quality working conditions for its employees and respect the applicable labor law legislation in the place where services and works are provided. In fulfilling the rights of its employees and subcontractors' employees, the partner undertakes to ensure:
 - 2.1.1 **treating employees with respect and dignity**, protecting them from any kind of abuse, harassment, violence, or workplace bullying (e.g., physical, verbal, mental, sexual), and identifying possible incidents and immediately responding to them with adequate and proper measures;
 - 2.1.2 **providing a workplace and working conditions that ensure the health and safety of employees in accordance with all relevant legislation and permits, including ensuring occupational health and safety guidance, training, and the provision of necessary work tools;**
 - 2.1.3 **the exclusion of the misuse of child labor** and compliance with the sub-requirements for the age and working conditions of the workforce stipulated in ILO conventions and

national legislation, and the work performed must not harm their safety and health, or physical, mental, moral or social development;

- 2.1.4 **exclusion of human trafficking and illegal labor.** The partner must act ethically to exclude any human rights violations;
 - 2.1.5 **excluding any discrimination by ensuring** equal opportunities and treatment for employees, regardless of their nationality, country of origin, skin color, social background, disability, sexual orientation, pregnancy or maternity, political or religious beliefs, gender, age, family or civil partnership status;
 - 2.1.6 **ensuring a fair and transparently paid and taxed salary and work volume that complies with the law,** at the same time meeting at least the established national minimum wage, trade union agreements, and industry standards. The partner undertakes not to recruit or force anyone to work against their will or in a situation where the working may be forced and exploited;
 - 2.1.7 **the right of employees to form trade unions** or similar employee representative organizations and join them (or not join) and the right to collective bargaining, and open and constructive dialogue, if necessary, with employee representatives;
 - 2.1.8 **privacy of individuals and freedom of expression.** The partner must ensure that products, services, and business processes are structured in a way that respects the privacy and freedom of expression of individuals.
- 2.2 **Sustainable development.** The Port of Tallinn prefers a partner who:
- 2.2.1 is proactive and systematic in environmental work and consistently reduces (as low as reasonably feasible) the negative impact of its activities on the environment, society, and economy (especially in relation to resource efficiency, emission reduction, and waste management) and increases the use and offer of ideas and innovative solutions that enable a positive impact;
 - 2.2.2 actively seeks opportunities to reduce its environmental footprint, values the economical use of materials and energy, and follows environmentally friendly work practices;
 - 2.2.3 contributes, if possible, to the reduction of CO₂ emissions.
- 2.3 **Corruption prevention and other requirements**
- 2.3.1 The partner uses the necessary measures to prevent corruption and economic crimes, by means of which the abuse of power for personal gain in daily business activities, the intentional distortion of order, principles, and trust, the giving or taking of bribes or accepting any other form of illegal payment are excluded.
 - 2.3.2 The partner undertakes not to participate in agreements that limit fair competition, including agreements that limit fair competition in bidding procedures, and any form of cartel agreements with competitors, such as sharing or allocating markets or customers or fixing prices.
 - 2.3.3 The partner undertakes to comply with the sanctions established by the Council of the European Union and the sanctions arising from UN Security Council resolutions or other legislation imposing obligations on Estonia or the partner's country of location/place of business, therefor must be avoided any cooperation with persons and companies subject to international sanctions (i.e., it is obliged to stop all kinds of relationships/activities with persons who knowingly or intentionally directly or indirectly participate in activities related to sanctioned persons), and handling and delivery of sanctioned goods and prevented their own intentional or unintentional participation in money laundering.

- 2.3.4 The partner undertakes to ensure compliance with the laws and directives regulating the protection, transmission, retention, and access to personal data, including in accordance with the General Data Protection Regulation (GDPR, EU 2016/679).

3 Responsibility

- 3.1 The partner is responsible for enforcing and controlling compliance with regulatory requirements and the principles of ethics in its operations.
- 3.2 The Port of Tallinn reserves the right to check compliance with the principles of ethics using a combination of internal and/or external evaluation mechanisms. The partner is obliged to cooperate and contribute to the audit.
- 3.3 Any violation of the principles set forth in the principles of ethics is considered a breach of contract by the partner.
- 3.4 In case of violation of any requirement stated in the principles of ethics, if it is possible due to the nature of the violation, the Port of Tallinn will give the partner a reasonable time to remedy the violation. If the partner is unable to remedy the violation within the set deadline or violates repeatedly, the Port of Tallinn can apply the legal remedies provided in contracts and by law.

4 Informing the Port of Tallinn about non-compliance with the principles of ethics

Partners can inform the Port of Tallinn about an existing and/or suspected violation of regulatory requirements and the principles of ethics through the corresponding notification channel. Detailed instructions for using the external notification channel are provided on the website of the Port of Tallinn.