Miltton Oy

United Nations Global Compact
Communication on Progress Report
December 2015 - November 2016
To our stakeholders,

Milton Oy is part of Milton Group. Milton Group is an ambitious, forward-looking communications group that has expanded from PR and corporate communications to encompass public affairs, investor relations, advertising and leadership consulting. One of our core services is sustainability consultation. We help our customers in improving their sustainability work and communications.

I am pleased to confirm that Milton Oy reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. We are committed to high business ethics and sustainable operations to reflect these principles, both in our own and client work.

In this Communications on Progress report, we describe our policies concerning the Global Compact’s Ten Principles and how we implement and monitor them in practice. We aim to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders.

Sincerely yours,

Mathias Järnström

Managing Director
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Human rights

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

**Assessment, policy and goals**

In the Finnish business environment, it is not common that basic human rights become an issue. Finland is a democratic welfare country that has advanced legislation in terms of human rights, and Miltton Oy is subject to Finnish legislation. Human rights are guaranteed by the Finnish constitution.

Finland has signed and ratified the following covenants:

- Universal Declaration of Human Rights
- United Nations International Covenant on Civil and Political Rights
- United Nations International Covenant on Economic, Social and Cultural Rights
- ILO Convention (nr 182) concerning child labour and immediate actions in banning and eliminating child labour

Miltton Oy is committed to high standards of ethical conduct and complies with all applicable national and international laws and regulations. Miltton Group’s Code of Conduct is a written policy that is signed by every employee as a part of the employment contract. It includes guidelines on human rights issues such as equality, responsible sourcing and respecting legislation. The Code of Conduct also states that employees have a right to refrain from work that compromises their personal ethics or beliefs. Miltton’s equality plan is under way and it aims to ensure that every employee is treated alike.

Miltton Oy’s main market areas are Finland and the Nordic countries. Miltton Oy provides services also to global companies who operate in more risky markets, where human rights need to be carefully considered. Through our services, our customers can have a better approach to understand, manage and communicate their human rights impacts to their stakeholders.

Miltton Oy is a member of Finnish Business & Society (FiBS), United Nations Global Compact and Global Reporting Initiative (GRI). Miltton Oy requires its business partners, subcontractors, and suppliers to comply with all applicable laws and regulation. However, Miltton Oy encourages its partners to strive beyond legal compliance.

**Implementation**

All employees sign Miltton Group’s Code of Conduct as an attachment to their employment contract. The Code of Conduct defines the standards and behaviour that is expected from every employee. Employees shall respect and follow the Code in their daily work and report any incidences of non-compliance they may be aware of. In the event an employee’s job appears to
contradict the Code or he/she becomes aware of a breach to the Code, employees shall immediately alert their superior or HR. If an employee wants to report or disclose a matter in confidence, there is also an anonymous whistleblowing channel. If an employee has been found to have acted against the Code, the employee’s contract may be terminated at the discretion of the management team.

Employees are selected and promoted based on qualifications and merit, without discrimination or concern for race, religion, national origin, colour, sex, sexual orientation, age or disability.

Miltton Oy conducts annually employee and equality surveys and takes action based on the findings.

**Measurement of outcomes**

Miltton Oy has not been involved in any legal cases or other relevant incidents related to the contravention of the Global Compact Human Rights Principles. No offences or incidents of discrimination have come up through the whistleblowing channel.

Human rights principles are essential to how Miltton Oy conducts business and treats its employees and other stakeholders. Respecting human rights is fundamental to our success. Our reputation is one way to measure human rights performance. Miltton’s reputation is excellent according to a reputation research survey conducted annually by Finnish marketing publication Markkinointi & Mainonta.

Annual equality and employee survey results are used to plan measures, and senior management monitors the fulfillment of this equality plan. For example, Miltton Oy organises monthly updates, which are transparent occasions where the Managing Director is present and every employee is invited.

Miltton Oy helps its customers and partners to operate in a more sustainable way. Through our services, our customers can improve their sustainability work, communications initiatives and stakeholder engagement. These can lead to greater responsibility for human rights, labour, environment and anti-corruption.
Labour

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

**Assessment, policy and goals**

Labour conditions are generally of a high standard in Finland. Violations of labour are usually minor. Finland is a democratic welfare country that has advanced legislation in terms of labour practices, and Milton Oy is subject to Finnish legislation. Fair working conditions are guaranteed by the Finnish constitution.

Finland has signed and ratified the following covenants:

- Universal Declaration of Human Rights
- United Nations International Covenant on Civil and Political Rights
- United Nations International Covenant on Economic, Social and Cultural Rights
- ILO Convention (nr 182) concerning child labour and immediate actions in banning and eliminating child labour

The Constitution of Finland guarantees freedom of association, that expressly includes the freedom to establish trade union. Trade unions have the right to pursue occupational benefits for their members through collective bargaining, and they are rather active in Finland.

Milton Oy is committed to high standards of ethical conduct and complies with all applicable national and international laws and regulations, including those relating to freedom of association. Employees have the right to refrain from work that compromises their personal ethics and beliefs.

Milton Oy does not employ child or forced labour, nor will we tolerate working conditions that conflict with international conventions and practices. We respect laws pertaining to wages and salaries as well as working time. No one should be discriminated against because of their age, ethnicity, nationality, language, religion, views, opinion, health, disability, sexual orientation or any other reason relating to their person.

Milton Oy requires its business partners, subcontractors, and suppliers to comply with all applicable laws and regulation. However, Milton Oy encourages its partners to strive beyond legal compliance.

The Code of Conduct and Employee Manual are written policies that guide our actions. Milton’s gender equality plan is also currently being updated into a more comprehensive equality plan.
Implementation

Milton Oy selects and promotes employees based on their qualifications and merit, without discrimination or concern for race, religion, national origin, colour, sex, sexual orientation, age or disability.

Milton conducted an equality assessment in 2016 and is currently updating its equality plan to include more than just gender equality. The equality plan will be finished in January 2017. All employees are familiarised with internal policies and the Code of Conduct.

Milton Oy helps its customers and partners to operate in a more sustainable manner. Through our services, our customers can improve their sustainability work, communications and stakeholder engagement. These can lead to greater responsibility for human rights, labour, environment and anti-corruption.

Milton Oy’s contract of employment does not involve a trade union. All employees have the freedom of association and they can join any union they prefer.

Superiors are responsible for implementing labour legislation correctly in the workplace. If a supervisor or an HR & Administration Director observes irregularities or for example absenteeism, it then becomes their responsibility to intervene. Working hours are recorded by every employee. These records are regularly monitored by supervisors and HR in order to avoid excessive overtime. The ultimate responsibility for legal compliance lies with the Managing Director. We have an anonymous whistleblowing channel to report concerns.

Measurement of outcomes

Milton Oy has not been involved in any investigations, legal cases or other events related to offences against Global Compact Labour Principles. No serious offences have come up through the whistleblowing channel.

Supervisors and human resources monitor working hours regularly and take actions accordingly.

Milton Oy conducts annual employee and equality surveys to find out possible topics of concern. Milton Oy listens to this feedback and matters are taken seriously. One example is that based on survey results, a new person has been hired to improve HR development. Senior Management set relevant targets, share these with supervisors, and monitor implementation and goal follow-up. Possible changes and plan checks are agreed together with personnel and reported in internal newsletters.
Environment

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

**Assessment, policy and goals**

Miltton Oy does not use substantial amounts of natural resources. Due to the nature of our business, however, our company utilises resources such as electricity and relies on paper and printing products, among other office items. Miltton employees travel regularly to meet clients, although travel is mostly short-distance. Conserving natural resources and supporting their sustainable use are important for us, too.

While Miltton Oy does not have a written policy for environmental management, the company aims to function in an environmentally friendly way, and some measures have been taken.

According to our Code of Conduct, in our client work all communication must be honest, truthful and accurate. No green or white washing is allowed.

**Implementation**

We use 100% green energy and have taken measures to reduce our energy consumption. For example, we use energy saving settings in our lighting, and heating and air conditioning are used thoughtfully.

We can also make an impact by choosing sustainable products and food supplies for the office. We favor organic fruits, smoothies and coffee, and local products at our meetings. Miltton Oy aims to strike a balance between consuming necessary office supplies and making our workplace more sustainable. For example, it is not possible to cut out printing entirely in our business, but Miltton Oy can choose its printing settings and paper. Miltton Oy recycles and sorts its waste thoroughly.

We help our customers understand stakeholder expectations for environmental responsibility and develop their environmental work and communications accordingly.

Truthfulness benefits all sides. Miltton Oy avoids implementing whitewashing and green washing practices in communication and advises clients against doing so. All communication should be honest and accurate. Miltton Oy will not knowingly produce work that contains statements, suggestions or images that are false or misleading.

**Measurement of outcomes**
Miltton Oy has not been involved in any legal cases or other relevant incidents related to the contravention of the Global Compact Environmental Principles.

Miltton Oy does not separately monitor environmental indicators. Our electricity company is Nordic Green Electricity and our electricity is from 100% renewable sources.
Anti-Corruption

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

**Assessment, policy and goals**

Milton Oy and its employees shall never offer, give, ask for, accept or receive any form of bribery. A bribe occurs when someone attempts to influence a decision by offering some form of undue or improper advantage, favour or incentive.

The Code of Conduct and Conflicting Interest Governance Guidelines are the company’s written policies concerning Anti-Corruption. Insider trading is addressed in our Employee Manual.

**Implementation**

Milton Oy complies with laws and regulations, and does not accept any illegal or morally questionable activities in any measures. In public bidding processes, the company plays by the mutual rules and act as openly as possible in the situation.

All employees sign Milton Group’s Code of Conduct that defines the standards and behaviour expected from every employee. Employees shall respect and follow this Code of Conduct. They help to promote the principles promoted in the Code. Employees shall report any incidences of non-compliance they may be aware of. In the event an employee’s job seems to contradict the Code or he/she becomes aware of a breach to the Code, employees shall immediately alert their superior or HR. If an employee has been found to have acted against the Code, the employee’s contract may be terminated at the discretion of the management team.

The use of confidential information in insider trading is strictly prohibited. We have an insider register that prohibits employees to talk about or comment the customer in any media or buy or sell shares during the period we possess critical information.

**Measurement of outcomes**

Milton Oy has not been involved in any investigations, legal cases or other relevant events related to offences against Global Compact Anti-Corruption Principles. No offences have come up through the whistleblowing channel.

We do not offer any cash or cash equivalents as gifts. Milton Oy’s employees shall not accept bribes in any form. These conditions are written in the Code of Conduct, which is signed by every employee.