

Midnight Communications Limited Human Rights Policy

Purpose

Midnight Communications is committed to conducting business in a manner that respects and supports internationally recognised human rights. This policy outlines our approach to upholding human rights across our operations, supply chain and client relationships.

Our commitment

We align our approach with the following internationally recognised frameworks:

- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The Universal Declaration of Human Rights and the International Bill of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work

We commit to respecting human rights in all aspects of our business and to avoiding causing, contributing to or being directly linked to adverse human rights impacts.

We are also a signatory to the UN Women's Empowerment Principles (WEPs), which guide our approach to advancing gender equality across our business.

Scope

This policy applies to all employees, contractors and associates of Midnight Communications. It also informs how we engage with suppliers, partners and clients.

Key focus areas

Given the nature and scale of our business, we prioritise the following areas:

- **Fair and respectful workplace:** We provide a workplace free from discrimination, harassment and unfair treatment and promote equality, diversity, and inclusion.
- **Labour standards:** We uphold fair working conditions, including appropriate pay, working hours and the right to dignity at work.
- **Health and wellbeing:** We maintain a safe and supportive working environment for all employees.
- **Responsible business relationships:** We seek to work with suppliers and clients who share our commitment to ethical conduct and human rights.
- **Client and content responsibility:** As a PR agency, we are mindful of the societal impact of our work and aim to avoid supporting activities that could contribute to harm.

Implementation

- This policy is supported by our Employee Handbook, Code of Ethics and related policies.
- Human rights considerations are incorporated into relevant business decisions, including supplier selection and client engagement.
- Responsibility for oversight sits with senior leadership, with day-to-day implementation embedded across the team.

Raising concerns

We encourage employees and external stakeholders to raise concerns related to human rights or ethical conduct. Reports can be made through our grievance procedure (accessible [here](#)), and any concerns will be taken seriously and handled appropriately.

Monitoring and Review

We will review this policy annually and update it as needed to reflect best practice and the evolving nature of our business.

Approval

This policy is approved by the leadership team of Midnight Communications and is publicly available on our website.