



CODE OF CONDUCT **FOR BUSINESS PARTNERS**

As representatives of the transport sector, we aim not only to reduce our impact on the climate, but also to protect and defend human rights, to follow the principles of ethical and fair business, which ensure transparent company operations and fair competition.

We follow these principles of ethical operation not only in the activities of the GBY Corporate Group (hereinafter – GBY), but we also seek and monitor that our partners and suppliers follow them. This code describes the principles of cooperation for business partners and the expectations related to human rights and environmental protection that the GBY Corporate Group places on its business partners. Therefore, all companies involved in business relations with GBY are invited to follow the principles provided for in this code in their daily activities and to spread this practice in their supply chains.

The Code was prepared based on the [Universal Declaration of Human Rights](#) of the United Nations, the United Nations [Global Compact](#) and the [ETI Base Code](#) of the Ethical Trading Initiative organization.

With this Code of Ethics, GBY also urges its business partners and customers to comply with the laws of the Republic of Lithuania and the laws of the country in which it operates. Bribery and any other form of corruption is prohibited. Business partners must also follow all other professional standards that apply in their sectors of activity.

1. Discrimination is prohibited

Business partners must ensure equal rights and opportunities for their employees and avoid discrimination of any kind. Discrimination must be avoided in all areas of activity and processes: recruitment, training, upgrading of qualification, salary, incentives, dismissal, parental leave, sick leave, retirement and disciplinary measures. No person may be discriminated against or have fewer opportunities because of their age, disability, ethnic origin, marital status, sex, skin colour, trade union membership, nationality, political beliefs, religion or belief, sexual orientation, pregnancy, social status, financial status, other personal characteristics or other objectively unjustified reasons.

2. Equality and justice

People who do the same or equivalent work and whose competencies, seniority or other measurable indicator of performance or ability correspond – without any discrimination – must receive the same salary. Everyone who has the necessary education, work experience, abilities and competences must be given the same conditions to develop and pursue a career in the company.

3. Fair and respectful behavior

It is necessary to respect the natural freedom, dignity and right to equality of every person. It must be ensured that no person experiences harsh or cruel treatment at the workplace or while performing their work elsewhere, as well as sexual harassment, physical punishment, psychological and physical abuse, bullying or insults, threats. Employees must feel safe and free to make decisions, express their opinions freely, so that no one humiliates them, demeans their dignity, or harms them either physically or psychologically.

4. No forced labor

Business partners may not use forced labor. It must be ensured that employees or other persons related to the company's activities are not forced to work against their will by means of threats and blackmail. Work must be freely chosen, maintaining the person's right to terminate the employment contract in accordance with applicable laws.

It must be ensured that there are no manifestations of oppression, exploitation, humiliation and modern slavery in the company.

5. Child labor is prohibited

Any form of child labor is prohibited. Business partners must comply with national laws and international legislation and declarations related to the protection of minors. Persons who have not reached the age of majority are not employed.

6. Wages and working hours

Wages must be paid in accordance with the laws and employment contract of the country where the activities are carried out and employees are hired, and the employment contract cannot conflict with the applicable legal acts. Social benefits provided for in legal acts must also be paid. The salary structure must be communicated to employees regularly and in a form that they understand. All obligations arising from the employment relationship must be set out in writing in the employee's employment contract.

Employees must work no longer than is allowed by the laws governing working hours, and have the right to take breaks provided by law.

Overtime must be voluntary and paid in accordance with the law, or it must be compensated with free time, if the employee does not object to it.

7. Freedom of association and the right to collective negotiations

The right to freedom of association and collective negotiations must be guaranteed. Employees have the right to organize meetings, to establish trade unions and employee representatives or to join them in accordance with legal acts. Employees also have the right to collective negotiations and the statutory right to strike.

The exercise of these rights cannot be penalized by any means.

8. Safe environment and health

Business partners must ensure a safe working environment and compliance with applicable safety standards. The workplace must comply with applicable laws and regulations. Any violation of fundamental human rights at the workplace, on company premises or while acting on behalf of the company is prohibited. It is particularly important to comply with fire safety and first aid requirements in emergency situations.

Employees must have the skills and qualifications required for the work being performed and be regularly trained in health and safety issues at the workplace. Adequate cleanliness and hygiene must also be ensured at the workplace. Where staff accommodation is provided, the same requirements apply to these premises accordingly.

An occupational health and safety representative must be appointed to be responsible for setting and enforcing health and safety standards in the workplace.

9. Disciplinary measures

Disciplinary measures must be applied in accordance with the requirements of national legislation and internationally recognized human rights. Any unreasonable disciplinary measures may not be applied, especially refusing to pay wages, social benefits, not returning personal documents or forbidding to leave the workplace.

When hiring private security service providers, business partners must ensure adequate supervision, control and training of them, in particular to prevent torture, cruel, inhuman and degrading treatment, injury and death, and violations of the right to freedom of association.

10. Trust, fair partnership and competition

The work with customers, business partners and suppliers is based on mutual trust. Mutual agreements and confidentiality are respected. Both when operating in Lithuania and abroad, laws, international agreements and legal acts that guarantee fair competition and activity must be observed. A respectful relationship with competitors must be maintained. Companies must operate in accordance with competition legislation and adhere to fair, transparent and ethical business principles.

11. Transparency

Transparency, trust, responsibility and cooperation – these are the values that we strive to maintain, nurture and protect in our activities. No form of corruption is tolerated. Employees whose duties and activities in companies may be more vulnerable to transparency and corruption must be trained during the interview on how to behave so that their actions are not treated as potentially non-transparent (bribery, attempted bribery, pressure, etc.) and could damage the company's reputation and destroy the trust of the public and the employees themselves. Employees do not give or accept gifts that are provided for any benefit. Every employee has the right and opportunity to report if they suspect or notice that someone in the company is acting in a non-transparent manner or is violating the law.

It is necessary to monitor and set safeguards to avoid conflict of interest in the company. Every person who is going to be employed must inform about a possible conflict of interest when he starts working for the company. Employees are encouraged to avoid situations that may lead to a conflict of interest. In case of doubt or noticing a suspicious situation, the employee must report it to their manager or the person responsible for the transparency of the company's activities, who guarantees confidentiality.

12. Links to politics

We do not support political parties and as a company we do not participate in political activities in any form, therefore we invite our business partners to adhere to these principles.

13. Confidentiality

Every employee must be introduced and clearly told that any internal company information that is not made public is confidential, protected by the company itself, and cannot be disclosed to third parties – family members, friends or others who do not work for the company. Disclosure of confidential company information may expose the employee to legal liability. The obligation to protect the company's confidential information and the legal liability for breach of this obligation remain even after the employee leaves the company. Employees cannot comment, speak or express an opinion on issues related to the company's activities in the media and public space (including social networks) without the permission of the person responsible for communication in the company. Even if the published information or opinion is not directly related to the company's activities, the employee may not comment or publicly express thoughts that would offend, humiliate other persons, their groups, and thus could damage the company's reputation. Respect is essential both within the company and with interested parties.

14. Supervisory authorities

We operate transparently, comply with the laws of the Republic of Lithuania and pay our due taxes. Cooperation with supervisory authorities is based on trust and respect.

15. Relationship with communities

The company's activities can include not only different regions of the country, but also locations in other countries. Therefore, close cooperation with people who live in the territories where company-related activities are carried out is very important.

16. Environmental protection

All laws and regulations related to environmental protection must be followed. The company's activities must comply with the requirements of legal acts regarding waste management, emission control, protection of water resources and pollution. Companies must comply with all legal requirements regarding hazardous materials, their storage, handling and disposal. Employees must be trained in the correct dealing and handling of hazardous materials, as well as in the correct sorting and delivery of other waste to recyclers and waste managers.

17. Natural resources and impact on the environment

It must be ensured that the company's activities do not harm the soil, do not pollute waters, air, do not emit harmful noise, and do not use excessive amounts of water, so as not to threaten access to clean drinking water, hinder access to sanitary facilities, and harm people's health. Efforts must be made to reduce resource use and waste.

Other environmental pollution must also be avoided or at least tried to be reduced. It must be ensured that the company's activities do not harm biodiversity.

18. Responsible supply chain

Companies must ensure that the provisions of this Code of Ethical Conduct are properly followed throughout their supply chain and that they are followed by their business partners.

19. Notification system

Companies must implement an internal reporting system for violations of the standards established in this Code of Ethical Conduct. Persons reporting violations cannot suffer or be discriminated against. Confidentiality must be guaranteed.

20. Help

If there is a threat that a violation of this Code of Ethical Conduct will be committed or has already been committed in the activities of companies or in their supply chain, companies must immediately take all possible actions to terminate, stop, prevent or minimize the impact of the violation as soon as possible. In the event of any violation of this Code of Ethical Conduct, please report it to GBY.

21. Audits

GBY has the right to monitor compliance with this Code of Ethical Conduct on a risk-adjusted basis and to the extent actually necessary. Business partners must provide all necessary information and explanations and allow GBY to carry out on-site inspections at the business partner's company, provided that it has been duly informed of such inspection in advance. GBY may entrust this inspection to a third party bound by confidentiality. During such inspections, there is an obligation to comply with the protection of personal data provided by law, as well as to protect the business and commercial secrets of the business partner.

22. Violations

In the event of a violation of obligations arising from this Code of Ethical Conduct, GBY has the right to set an appropriate deadline for remedying the violation, and if the violation is not rectified or is refused within this deadline, GBY has the right to refuse or terminate the contract. If the violation is serious, there is no need to set a deadline. Upon withdrawal or termination of the contract, GBY shall not be obliged to compensate the business partner for damages related to the withdrawal or termination of the contract.

GBY is committed to ethical business principles and monitors that the provisions listed in this document are not violated.

The Director of UAB GBY is responsible for monitoring compliance with the principles of this code in GBY. Everyone who works in or with our company is introduced to this document so that they know our operating principles and our goal to achieve them.

You can report questionable activities or violations in the field of ethical business conduct by contacting the person responsible for this code directly or by writing an e-mail to trust@gby.lt or anonymously – through GBY's internal message channels available on the GBY website. All reports of possible violations are treated with confidentiality, in accordance with the procedure for receiving and examining the information of the reporting channel. If actions that do not comply with the provisions of the policy are identified, disciplinary measures are taken immediately.

This code is reviewed once a year and updated as necessary.

Approved by:

Resolution of the Board of UAB GBY dated 23-02-2023