



## **CODE OF CONDUCT** **FOR EMPLOYEES**

We aim to follow the principles of fair business, therefore we also set high standards of conduct for our employees, regardless of the geographic or economic context where we operate.

This Code of Conduct describes the principles of mutual cooperation and behavioral guidelines that we apply without exception to every employee of the GBY Corporate Group (hereinafter – GBY). We invite you to follow the principles and rules of conduct provided for in this code in your daily work activities and to disseminate this practice to all interested parties with whom you communicate.

### **What is expected from the employee?**

- Understand and follow the guidelines set out in GBY's Code of Conduct, adhere to the Human Rights, Equal Opportunities, Prevention of Violence and Harassment at Work and Ethical Employment policies and codes approved by GBY.
- Notice cases of misconduct, policy/code violations and report them through the reporting channels provided by GBY.
- Express their concerns or doubts about the situations that arise and discuss them with their immediate supervisor or the manager responsible for this code.
- Perform their work duties honestly, transparently and responsibly.
- Adhere to all behavioral guidelines set forth below.

**1. We act responsibly and transparently.** We comply with the laws of the Republic of Lithuania, policies and codes approved by GBY and other GBY's internal documents.

**2. We only give and accept gifts that do not conflict with GBY's business ethics.** We only give low-value, non-financial *gifts with the GBY logo* to business partners. We only accept low-value, non-financial gifts. We give and accept gifts only in cases where it is not related to the decision to be made, is not intended to influence business relations and is not considered a bribe. We do not offer or accept gifts or hospitality (travel, accommodation, meals) in exchange for a favorable decision, we do not give gifts to civil servants and officials.

**3. We avoid conflict of interest.** We avoid any possibility of a conflict of interest – that is, we avoid situations where GBY and your personal interests are intertwined. Personal interests include any benefit to yourself and your family members, relatives, persons or organizations with whom you have or have had business or family ties. An avoidable conflict of interest situation is a situation where your interests may affect your unbiased opinion or decisions in the performance of work duties. You must consult with your immediate supervisor. In the event of a potential conflict of interest, you must consult with your immediate supervisor.

**4. We support communities and activities based on business goals and social value.** When making a decision on the support of projects or activities, we take into account the company's strategy and sustainability directions, we assess the possible risks of reputation and corruption. Sponsorship decisions are made by the GBY Board/Management. We do not support political activities, politicians, political organizations and activities or organizations that do not meet GBY's ethical standards. Only such sponsorship projects are carried out, which can be confidently announced publicly.

**5. We avoid any manifestations of corruption.** We never offer, support or accept anything of value that could be sought to influence a business decision. We communicate transparently and openly with third parties. If you are in doubt or receive information about a possible case of corruption, report it to your immediate supervisor or the manager responsible for this code. We adhere to the highest ethical standards when communicating with government officials, and at least two GBY representatives attend

the scheduled meeting.

**6. We consider links to politics responsibly.** We do not prohibit employees from participating in political activities, but this must be clearly separated from duties and responsibilities while working for the company. An employee participating in politics must ensure that the political positions expressed or supported by the employee will be treated as a personal opinion and not as a position of the company. The employee must be sure that this political activity will not harm the company and its reputation.

**7. We protect sensitive information, personal data.** We ensure the confidentiality of contracts, customer data, internal company information, intellectual property, and commercial secrets. We treat all non-public information with care and caution. We use personal data only to perform work tasks, we do not collect, store or process personal data when the purpose of their processing/use is unclear. We use company information only to perform work tasks, not for personal purposes. We do not post any GBY-related information on social media unless you have permission to do so. We act responsibly on the Internet. If you have any doubts, please consult your manager. When accessing company information, we use only GBY-approved devices and software, and follow to the IT security policy. We do not use work devices for personal purposes. If we suspect a security incident, we immediately inform our immediate supervisor or the person responsible for IT.

**8. We publish information on social networks responsibly.** We act responsibly on the Internet, we do not share any internal GBY information on social networks, unless we have permission to do this from a direct supervisor. We do not publish images or recordings from the company's informal events and meetings on social networks, we only share the visual content of the events published on the company's official accounts. Content published on the Internet or public comments must not harm the company or cause a reputational risk for it. If you have any doubts, please consult your immediate supervisor.

**9. We strive for fair competition.** We support fair competition and anti-monopoly policy. We comply with the laws, regulations and requirements of each country in which we operate. We do not engage in prohibited agreements that threaten, distort or limit competition. We do not take actions that may harm customers, competitors or other stakeholders. When contacting or communicating with an existing or potential competitor, we carefully comply with the relevant competition legislation, never discuss the company's internal information, do not seek illegal agreements (prices, policy for their determination, formulas, marketing actions, etc.).

**10. We act with respect, follow the principles of equal opportunities and non-discrimination.** We value everyone's right to freedom, privacy and self-expression. We communicate respectfully and politely. When communicating both with each other and with third parties, we avoid any manifestations of discrimination, we follow the principles of diversity, non-discrimination and non-harassment (GBY's Equal Opportunities and Violence and Harassment Prevention Policies at Work). We appreciate everyone's efforts and involvement. We support vulnerable employees and focus on their growth.

**11. We cooperate and adhere to agreements.** We encourage sharing of ideas, introducing innovations and solving emerging professional challenges. We appreciate the knowledge of our colleagues. We comply with legal and contractual obligations, mutual agreements. We are attentive to our business customers, we strive to create customized and most suitable offers for them, therefore we constantly raise ideas, discuss changes in expectations and new opportunities to fulfill them.

**12. We buy responsibly.** We act in accordance with the assigned responsibilities and powers, we carry out procurements in accordance with the approved procurement procedure. We conduct procurement in accordance with the highest standards of ethics and procurement practices. When approving a procurement proposal, we make sure that the supplier complies with GBY's code of ethics for business partners. Procurement contracts are confidential information, the content of which we do not share with unrelated persons.

**13. We create a safe and healthy environment.** We create a work environment that meets the highest standards, we strive for a physically and psychologically healthy work environment. We understand the importance of this and take responsibility for following safety and health rules, procedures and requirements. We act without harming ourselves or those around us. We monitor the activities of those around us and do not remain indifferent to non-compliance with safety rules – we notify the Safety and

Health Specialist, thus avoiding possible incidents and accidents. We pay special attention to protecting the image and reputation of the company.

**14. We are responsible for our impact on the environment.** In the course of our activities, we comply with environmental laws and GBY requirements, conserve natural resources, properly sort waste, and avoid negative impact on the environment. We plan trips responsibly, assessing their necessity, cost and time consumption, we prefer communication via virtual means. We inform our immediate supervisor or the manager responsible for this code of any environmental violation, even if it is suspected.

**15. We adhere to the prevention of money laundering.** In carrying out our activities, we follow the standard processes adopted by GBY, we do not consult or negotiate with suspected criminals, we do not assist in the acquisition or management of criminal assets. We do not participate in transactions involving unrelated parties with unusual payment methods, terms or conditions.

**16. We foster a culture of zero tolerance for unethical behavior.** We notice questionable situations and wrongdoings and do not remain indifferent to them – we have zero tolerance for unethical behavior. We report questionable situations through GBY's internal messaging channel, inform our immediate supervisor or the manager responsible for this code.

GBY undertakes to adhere to ethical business principles and monitors that the guidelines for ethical behavior listed in this document are not violated. If these principles of ethical behavior are violated, the employer has the right to apply disciplinary measures, including termination of the employment contract.

The Director of UAB GBY is responsible for monitoring compliance with the principles of this code in GBY. Everyone who works in 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 conduct of employees by contacting the person responsible for this policy directly or by writing an e-mail to [trust@gby.lt](mailto: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*