

## CODE OF ETHICAL EMPLOYMENT

We aim for every employee of the GBY Corporate Group (hereinafter – GBY) to feel respected, appreciated and safe, therefore we set ourselves the highest standards of ethical employment. Using the [ETI Base Code](#) of the global organization Ethical Trading Initiative, we have defined the principles of ethical employment that we follow and encourage our business partners and suppliers to follow:

1. Work is chosen freely. Employment at GBY is voluntary and it is possible to terminate the employment relationship without restrictions, in accordance with the requirements of legal acts, by notifying about it in accordance with the procedure provided for by law.
2. When employing a person, the laws of the Republic of Lithuania and the provisions of the Labor Code of the Republic of Lithuania are observed. No person is discriminated or singled out from others in recruitment processes. Equal conditions are created for everyone.
3. Employees have the right to rest. The company monitors that people do not work more than the law provides, the requirements set for the transport sector ensure the necessary balance of work and rest.
4. Employees cannot be forcefully or verbally forced to work. Employees have the right to terminate their employment and their employment contract with the company in accordance with the laws and provisions of the Labor Code of the Republic of Lithuania.
5. All employees of the company have equal rights to professional development, training, and career opportunities.
6. The company respects and supports the right of employees to join peaceful associations and the right to collective negotiations. The company does not interfere with this activity, does not discriminate against representatives elected by employees and allows them to perform the functions represented in the company.
7. The company respects and supports the right of employees to join peaceful professional associations.
8. The company guarantees safe working conditions that meet the basic human needs. Employees are introduced to potential dangers inherent in transport sector companies and their activities. The company takes all necessary measures to prevent accidents or damage to the health of employees at their workplace. Employees are trained in safety and health issues on a regular basis and recorded accordingly. The training is repeated for employees starting new positions and new employees. Special attention is also paid to evacuation training.
9. The company tries to improve the working conditions for each employee as much as possible, so that the person working here feels dignified and does not feel discomfort. If accommodation services are provided, the employer undertakes to guarantee that they will be clean, safe and meet the basic needs of the employees. The *Occupational Safety and Health Specialist* is responsible for compliance with the occupational safety and health norms in the company.
10. Employees have the right to speak and be heard about their working conditions. The company responds to employees' comments regarding the working conditions, which the company constantly improves, providing the necessary comfort to the employees. The employee has the right to report inappropriate or deteriorated working conditions to their *immediate supervisor*, who immediately reacts and resolves the situation in order to protect the employee from possible harm.
11. The company does not employ children. Young people under the age of 18 are not employed. The company complies with the laws and labor legislation in force in Lithuania.
12. The employer regularly reviews wages and ensures that employees are paid appropriately for their work. The guaranteed salary is not lower than the minimum wage. Before signing the employment contracts, the employee is introduced to the working conditions and salary. Every time a salary is paid, the employee also receives information about what the salary consists of and for what period it is paid. The company does not apply disciplinary measures or other deductions from wages not provided for in the Labor Code of the Republic of Lithuania.

13. Overtime in the company is voluntary. It is observed that the employees work the number of working hours provided for by the legal acts of the Republic of Lithuania or the international regulation provided for their work. It is observed that the working regime does not harm the health of the employees, and the established balance of rest and working hours is maintained.
14. Every employee is respected in the company. Discrimination based on race, gender, nationality, language, origin, marital or social status, age, sexual orientation, disability, medical condition, ethnicity, membership in a political party or association, religion, faith, belief or opinion is not tolerated here. Employees are not discriminated against in the areas of employment, pay, training, promotion, termination of employment or retirement.
15. In the company, working relations are based not only on respect, but also on honesty. Also, they do not contradict the laws in force in the country. The employer seeks permanent employment relationships, does not conclude short-term contracts with employees just to avoid obligations.
16. The company does not tolerate harsh or inhumane behavior, any violence (physical/psychological), threats, harassment, insults or other humiliating or hurtful actions are prohibited.
17. The company tries to maintain a gender balance as far as possible (and as far as the specifics of the transport sector allow) and supports the principles of equality and inclusion.
18. The company respects every employee and values everyone's contribution to the company's activities. The company pays special attention to human rights and their care. You can learn about the essential principles that the company adheres to in GBY's Human Rights Policy.
19. The company communicates with employees through mutually agreed communication channels acceptable to all. However, if necessary, the employee can express the need to communicate in another form or language that is more understandable, clearer and acceptable.
20. The company accepts employees' thoughts, ideas and suggestions related to the company's operations, working conditions, their improvement, and overall welfare creation within the company and in communication with interested parties.
21. Employees have the right and the opportunity to anonymously report possible violations of human rights, labor law, ethics and other violations within the company or in the supply chain.
22. Based on the laws of the Republic of Lithuania and international regulations, the company protects its data, that of its employees and partners, therefore employees are informed and trained on how to work to protect not only data related to the company's activities, but also their own data.

The code is public and available on the GBY website [www.gby.lt](http://www.gby.lt), as we aim for all interested parties to be aware of our operating principles and values. The Director of UAB GBY is responsible for compliance with the principles of ethical employment at GBY. Everyone who works for or with our company is made aware of this document so that they are aware of their rights and our commitment to respecting them.

You can report questionable activities or violations in the field of ethical employment 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 this code 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*