



CODE OF CONDUCT FOR EMPLOYEES

We seek to follow the principles of fair business; therefore, we also set high standards of conduct for our employees, regardless of the geographical or economic context in which we operate.

This Code of Conduct describes the principles of mutual cooperation and the guidelines for conduct that we apply without exception to every employee of the GBY group of companies (hereinafter - the Company). We invite you to follow the principles and rules of conduct set out in this Code in your daily work and to promote this practice among all stakeholders with whom you communicate.

What is expected of an employee?

- To understand and comply with the guidelines set out in this Code of Conduct and to comply with the Human Rights, Equal Opportunities, Violence and Harassment at Work Prevention and Ethical Employment policies and codes approved by the Company.
- To notice improper conduct and breaches of policies/codes and report them through the Company's designated reporting channels.
- To express concerns or doubts regarding situations that arise and consult with one's immediate manager or with the manager responsible for this Code.
- To perform work duties honestly, transparently and responsibly.
- To comply with all conduct guidelines set out below.

1. We act responsibly and transparently. We comply with the laws of the Republic of Lithuania, the policies, codes and other internal documents approved by the Company.
2. We give and accept only gifts that are consistent with the Company's business ethics. We give business partners only low-value, non-financial gifts bearing the Company logo. We accept only low-value, non-financial gifts. We give and accept gifts only where this is not related to a decision being made, where there is no intention to influence business relations and where it is not considered a bribe. We do not offer or accept gifts or hospitality (travel, accommodation, meals) in exchange for a favourable decision, and we do not provide gifts to civil servants or public officials.
3. We avoid conflicts of interest. We avoid any appearance of a conflict of interest, i.e. situations in which the Company's interests and your personal interests overlap. Personal interests include any benefit for yourself and your family members, close relatives, persons or organisations with which you have or have had business or family ties. A situation to be avoided as a conflict of interest is a situation in which your interests may affect your impartial opinion or decisions in performing work duties. In the event of a potential conflict of interest, you must consult your immediate manager.
4. We support communities and activities in line with business objectives and social value. When deciding on support for projects or activities, we take into account the Company's strategy and sustainability directions and assess potential reputational and corruption risks. Sponsorship decisions are made by the Company's board/management. We do not support political activities, politicians, political organisations, or activities or organisations that do not meet the Company's ethical standards. Only sponsorship projects that can be openly disclosed publicly are carried out.
5. We avoid any manifestations of corruption. We never offer, support or accept anything of value that could be intended to influence a business decision. We communicate transparently and openly with third parties. If you have doubts or receive information about a possible case of corruption, report it to your immediate manager or to the manager responsible for this Code. When communicating with

public authorities, we follow the highest ethical standards and at least two Company representatives attend scheduled meetings.

6. We assess links with politics responsibly. Employees are not prohibited from participating in political activities; however, such activities must be clearly separated from duties and responsibilities in the Company. An employee participating in politics must ensure that their political positions expressed or supported are treated as personal opinions and not as the Company's position. The employee must be certain that their political activity will not harm the Company or its reputation.
7. We protect sensitive information and personal data. We ensure the confidentiality of contracts, client data, internal Company information, intellectual property and trade secrets. We handle all non-public information carefully and prudently. Personal data is used only for work tasks; we do not collect, store or process personal data where the purpose of processing/use is unclear. We use Company information only to perform work tasks and not for personal purposes. We do not publish any information related to the Company on social networks unless we have permission. We act responsibly online. If in doubt, we consult our manager. When accessing Company information, we use only devices and software approved by the Company and comply with the IT security policy. We do not use work devices for personal purposes. If we suspect a security incident, we immediately inform our immediate manager or the person responsible for IT.
8. We publish information responsibly on social networks. We act responsibly online and do not share any internal Company information on social networks unless we have permission from our immediate manager. We do not publish images or recordings from informal Company events or meetings on social networks; we share only visual content from events published on the Company's official accounts. Content or public comments published online must not harm the Company or create reputational risk. If in doubt, please consult your immediate manager.
9. We pursue fair competition. We support fair competition and antitrust policy. We comply with the laws, regulations and requirements of each country in which we operate. We do not engage in prohibited agreements that could threaten, distort or restrict competition. We do not take actions that may harm clients, competitors or other stakeholders. When contacting or communicating with an existing or potential competitor, we carefully follow the relevant competition law requirements, never discuss the Company's internal information and do not seek unlawful agreements (prices, pricing policies, formulas, marketing actions, etc.).
10. We act with respect and follow the principles of equal opportunities and non-discrimination. We value every person'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 and follow the principles of diversity, non-discrimination and non-harassment (the Company's Equal Opportunities and Violence and Harassment at Work Prevention policies). We value everyone's efforts and involvement. We support vulnerable employees and pay attention to their development.
11. We cooperate and comply with agreements. We encourage the sharing of ideas, implement innovations and solve professional challenges that arise. We value colleagues' knowledge. We comply with legal and contractual obligations and mutual agreements. We are attentive to our business clients and seek to create tailored and most suitable offers for them; therefore, we continuously generate ideas and discuss changing expectations and new opportunities to meet them.
12. We purchase responsibly. We act within the responsibilities and authorisations granted to us and carry out procurement in accordance with the approved procurement procedure. We conduct procurement in line with the highest standards of ethics and procurement practice. When approving a purchase offer, we ensure that the supplier complies with the Company's Business Partner Code



of Ethics. Procurement contracts are confidential information and their content is not shared with unrelated persons.

13. We create a safe and healthy environment. We create a working environment that meets the highest standards and seek both a physically and psychologically healthy workplace. We understand its importance and take responsibility by following occupational health and safety rules, procedures and requirements. We act without harming ourselves or others. We monitor the actions of others and do not remain indifferent to non-compliance with safety rules - we report to the Occupational Health and Safety Specialist, thereby helping to avoid possible incidents and accidents. We pay particular attention to protecting the Company's image and reputation.
14. We are responsible for our environmental impact. In carrying out our activities, we comply with environmental laws and Company requirements, conserve natural resources, sort waste properly and avoid negative environmental impacts. We plan trips responsibly, assessing their necessity and the related cost and time expenditure, giving priority to more sustainable solutions wherever possible.
15. We prevent money laundering and terrorist financing. We conduct business only with reliable partners and clients and assess their reputation and activities. We do not participate in transactions where the source of funds or assets is unclear or suspicious. If any suspicions arise regarding the legality of transactions, we immediately inform the responsible manager.
16. We do not tolerate unethical conduct. We do not tolerate any conduct that could harm the Company, employees, partners, clients or other stakeholders, including harassment, discrimination, intimidation, threats, bullying, violence, violations of confidentiality, breaches of law or other conduct inconsistent with the Company's values.

This Code is public and available on the Company's website www.gby.it, as we seek to ensure that all stakeholders are aware of our operating principles and values. The Company's Director is responsible for compliance with this Code of Conduct. Every person working in or with our Company is familiarised with this document.

You may report any questionable activities or breaches by contacting the person responsible for this Code directly, by writing to trust@gby.it, or anonymously through the Company's internal reporting channels available on the Company's website. All reports of potential breaches are examined confidentially in accordance with the procedure for receiving and examining information through the reporting channel.