



CODE OF ETHICAL CONDUCT FOR BUSINESS PARTNERS

As representatives of the transport sector, we seek not only to reduce our climate impact, but also to protect and uphold human rights, follow the principles of ethical and fair business conduct, and ensure transparent operations and fair competition.

We apply these ethical principles not only in the activities of the GBY group of companies (hereinafter - GBY), but also seek and monitor that our partners and suppliers adhere to them. This Code for Business Partners describes the principles of cooperation and the expectations related to human rights and environmental protection that the GBY group of companies sets for its business partners. Therefore, all companies that have business relationships with GBY are invited to follow the principles set out in this Code in their day-to-day activities and to promote this practice throughout their supply chains.

This Code has been prepared on the basis of the United Nations Universal Declaration of Human Rights, the United Nations Global Compact and the Ethical Trading Initiative's ETI Base Code.

Through this Code of Ethics, GBY also encourages its business partners and clients to comply with the laws of the Republic of Lithuania and the laws of the country in which they operate. Bribery and any other form of corruption are prohibited. Business partners must also comply with all other professional standards applicable to their sectors of activity.

1. Prohibition of Discrimination

Business partners must ensure equal rights and opportunities for their employees and avoid any form of discrimination. Discrimination must be avoided in all areas and processes of activity: recruitment, training, professional development, remuneration, incentive measures, dismissal, parental leave, sickness, retirement and disciplinary measures. No person may be discriminated against or have fewer opportunities on the grounds of age, disability, ethnic origin, family status, sex, skin colour, membership of employee organisations, nationality, political opinions, religion or belief, sexual orientation, pregnancy, social status, property status, other personal characteristics or other objectively unjustified reasons.

2. Equality and Fairness

People who perform the same or equivalent work and whose competencies, length of service or other measurable indicators of performance or ability are equivalent must, without any discrimination, receive equal remuneration. All persons who have the required education, work experience, skills and competencies must be given equal opportunities to develop and pursue a career in the company.

3. Fair and Respectful Conduct

The inherent freedom, dignity and right to equality of every person must be respected. It must be ensured that no person is subjected to harsh or cruel treatment in the workplace or while performing their work elsewhere, nor to sexual harassment, corporal punishment, psychological or physical violence, bullying, insults or threats. Employees must feel safe and free to make decisions and freely express their opinions, without being humiliated, having their dignity diminished, or being harmed physically or psychologically.

4. No Forced Labour

Business partners may not use forced labour. It must be ensured that employees or other persons associated with the company's activities are not forced to work against their will through threats or blackmail. Work must be freely chosen, while 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 or modern slavery in the company.

5. Child Labour Is Prohibited

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

6. Remuneration and Working Time

Remuneration must be paid in accordance with the laws of the country in which activities are carried out and employees are hired, and with the employment contract, which may not conflict with applicable legislation. Statutory social benefits must also be paid. Employees must be regularly informed of the structure of their remuneration in a form they understand. All obligations arising from employment relations must be set out in writing in the employee's employment contract.

Employees must not work longer than is permitted under laws regulating working time and must have the right to statutory breaks.

Overtime must be voluntary and paid in accordance with the procedure established by law, or compensated with time off, provided that the employee does not object.

7. Freedom of Association and Right to Collective Bargaining

The right to freedom of association and collective bargaining must be guaranteed. Employees have the right, in accordance with legislation, to hold meetings, establish or join trade unions and employee representative bodies. Employees also have the right to collective bargaining and the statutory right to strike.

The exercise of these rights may not be penalised by any measures.

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 other legal acts. Any violation of fundamental human rights in the workplace, on company premises or when acting on behalf of the company is prohibited. Compliance with fire safety and emergency first-aid requirements is particularly important.

Employees must have the skills and qualifications required for the work performed and must be regularly trained in health and safety matters at the workplace. Appropriate cleanliness and hygiene must also be ensured at the workplace. If accommodation is provided to employees, the same requirements apply to such premises accordingly.

An employee health and safety representative responsible for establishing and ensuring compliance with health and safety standards at the workplace must be appointed.

9. Disciplinary Measures

Disciplinary measures must be applied in compliance with the requirements of national legislation and internationally recognised human rights. No unjustified disciplinary measures may be applied, especially refusing to pay wages or social benefits, withholding personal documents or prohibiting a person from leaving the workplace.

When engaging private security service providers, business partners must ensure appropriate supervision, control and briefing measures, primarily to prevent torture, cruel, inhuman and degrading treatment, injuries and deaths, and violations of the rights to freedom of association.

10. Trust, Fair Partnership and Competition

Work with clients, business partners and suppliers is based on mutual trust. Common agreements and confidentiality are respected. Both in Lithuania and abroad, laws, international agreements and legal acts that ensure fair competition and conduct must be complied with. A respectful relationship with competitors is maintained. Companies must act in accordance with competition laws and follow the principles of fair, transparent and ethical business.

11. Transparency

Transparency, trust, responsibility and cooperation are values that we seek to maintain, foster and protect in our operations. No form of corruption is tolerated. Employees whose positions and activities in companies may be more vulnerable from the perspective of transparency and corruption must be trained during meetings on how they should act so that their actions are not regarded as potentially non-transparent (bribery, attempted bribery, pressure, etc.) and could not damage the company's reputation or undermine the trust of society and employees themselves. Employees do not give or accept gifts that are offered in order to obtain any benefit. Every employee has the right and opportunity to report if they suspect or observe that someone in the company is acting non-transparently or violating the law.

Safeguards must be monitored and established to avoid conflicts of interest in the company. Every person who is being considered for employment must inform the company of any potential conflict of interest that may arise when they start working. Employees are encouraged to avoid situations that could create a conflict of interest. If doubts arise or a suspicious situation is observed, the employee must report it to their manager or to the person responsible for transparency in the company's activities, who ensures confidentiality.

12. Political Involvement

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

13. Confidentiality

Every employee must be informed and clearly explained that any internal company information that is not publicly disclosed is confidential, protected by the company, and may not be disclosed to third parties - family members, friends or others who do not work for the company. Disclosure of confidential company information may result in legal liability for the employee. The obligation to protect confidential company information and legal liability for breaching this obligation remain in force after the employee has left the company. Without the permission of the person responsible for communications in the company, employees may not comment, make statements or express opinions in the media or public space, including social networks, on matters related to the company's activities. Even if the published information or opinion is not directly related to the company's activities, an employee may not comment or publicly express thoughts that would offend or demean other persons or groups of persons and could thereby damage the company's reputation. Respect is necessary both within the company and in relations with stakeholders.

14. Supervisory Authorities

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

15. Relationship with Communities

The company's activities may cover not only different regions of the country but also locations in other countries. Therefore, close cooperation with people living in the territories where activities related to the company are carried out is very important.

16. Environmental Protection

All environmental laws and regulations must be complied with. The company's activities must comply with legal requirements relating to waste management, emissions control, protection of water resources and pollution. Companies must comply with all legal requirements concerning hazardous substances, their storage, handling and disposal. Employees must be trained on how to properly manage and handle hazardous substances, as well as how to properly sort other waste and deliver it to recyclers and waste management operators.

17. Natural Resources and Environmental Impact

It must be ensured that the company's activities do not harm soil, pollute water or air, generate harmful noise or use excessive amounts of water in a way that would threaten access to clean drinking water, make access to sanitary facilities more difficult or harm people's health. Efforts must be made to reduce resource use and the amount of waste.

Other forms of environmental pollution must also be avoided, or at least efforts must be made to reduce them. 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 complied with throughout their supply chain and that their business partners also comply with them.

19. Reporting System

Companies must establish an internal reporting system for violations of the standards set out in this Code of Ethical Conduct. Persons who report violations must not suffer negative consequences or be discriminated against. Confidentiality must be guaranteed.

20. Remediation

If there is a risk that a violation of this Code of Ethical Conduct may occur or has already occurred in the operations of companies or in their supply chain, companies must immediately take all possible measures to terminate, stop, prevent or minimise the impact of the violation as quickly as possible. In the event of any violation of this Code of Ethical Conduct, please inform GBY.

21. Audits

GBY has the right, on a risk-based basis and to the extent actually necessary, to verify compliance with this Code of Ethical Conduct. Business partners must provide all necessary information and explanations and enable GBY to carry out on-site inspections at the business partner's company, provided that the business partner has been duly informed in advance of such inspection. GBY may also entrust this inspection to a third party that has committed to confidentiality. During such inspections, applicable personal data protection requirements under law are complied with, and the business partner's business and commercial secrets are protected.



22. Violations

In the event of a breach of the obligations arising from this Code of Ethical Conduct, GBY has the right to set an appropriate deadline for remedying the breach and, if the breach is not remedied within this deadline or if remediation is refused, GBY has the right to withdraw from or terminate the contract. If the breach is serious, setting a deadline is not required. If GBY withdraws from or terminates the contract, GBY will not be obliged to compensate the business partner for damage related to the withdrawal from or termination of the contract. GBY undertakes to follow ethical business principles and monitors that the provisions listed in this document are not violated.

The Director of UAB GBY is responsible at GBY for monitoring compliance with the principles of this Code. Every person working in or with our company is familiarised with this document so that they know our operating principles and our objective to pursue them.

You may report any questionable activity or breaches in the field of ethical business conduct by contacting the person responsible for this Code directly, by writing to trust@gby.lt, or anonymously through GBY's internal reporting channels available on GBY's website. All reports of potential breaches are examined confidentially in accordance with the reporting channel's procedure for receiving and examining information. If actions inconsistent with the provisions of this Code are identified, disciplinary measures are taken without delay.

This Code is reviewed once a year and updated where necessary.

Approved:

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