

## ETHICAL EMPLOYMENT CODE

We seek to ensure that every employee of the GBY group of companies (hereinafter - the Company) feels respected, valued and safe; therefore, we set the highest standards of ethical employment for ourselves. By referring to the Ethical Trading Initiative's ETI Base Code on labour practices, we have defined the principles of ethical employment that we follow and encourage our business partners and suppliers to follow:

1. Employment is freely chosen. Employment in the Company is voluntary, and employees may freely terminate employment relations in accordance with legal requirements by giving notice in the manner prescribed by law.
2. When employing a person, the Company complies with the laws of the Republic of Lithuania and the provisions of the Labour Code of the Republic of Lithuania. No person is discriminated against or singled out in recruitment processes. Equal conditions are provided to everyone.
3. Employees have the right to rest. The Company monitors that people do not work more than is permitted by law and by the requirements applicable to the transport sector, ensuring the necessary work and rest balance.
4. Employees may not be forced to work by force or by verbal pressure. Employees have the right to cease work and terminate their employment contract with the Company in accordance with laws and the provisions of the Labour Code of the Republic of Lithuania.
5. All Company employees have equal rights to professional development, training and career opportunities.
6. The Company respects and supports employees' right to form peaceful associations and the right to collective bargaining. The Company does not obstruct this activity, does not discriminate against employees' elected representatives and allows them to perform their representative functions within the Company.
7. The Company respects and supports employees' right to form peaceful professional associations.
8. The Company ensures safe working conditions that meet essential human needs. Employees are familiarised with potential hazards characteristic of transport sector companies and their activities. The Company takes all necessary measures to avoid accidents or harm to employees' health at the workplace. Employees are regularly trained in occupational health and safety matters, with such training duly recorded. Training is repeated for employees taking up new positions and newly hired employees. Particular attention is also paid to evacuation training.
9. The Company seeks, to the extent possible, to improve each employee's working conditions so that the person working here feels dignified and does not experience discomfort. If accommodation services are provided, the employer undertakes to ensure that they are clean, safe and meet employees' essential needs. The Occupational Health and Safety Specialist is responsible for compliance with occupational health and safety standards in the Company.
10. Employees have the right to speak up and be heard regarding their working conditions. The Company responds to employees' comments on working conditions and continuously improves them, providing the necessary comfort for employees. An employee has the right to inform their immediate manager about unsuitable or deteriorated working conditions, and the manager must respond without delay and resolve 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 labour legislation in force in Lithuania.
12. The employer regularly reviews remuneration and ensures that employees receive appropriate pay for their work. Guaranteed remuneration is not lower than the minimum wage. Before signing employment contracts, employees are familiarised with working conditions and remuneration. Each time remuneration is paid, the employee also receives information on the components of the remuneration and the period for which it is paid. The Company does not apply disciplinary measures or other deductions from wages that are not provided for in the Labour Code of the Republic of Lithuania.
13. Overtime in the Company is voluntary. The Company monitors that employees work only the number of working hours permitted by the laws of the Republic of Lithuania or the international regulations applicable to their work. The Company ensures that the working regime does not harm employees' health and that the established balance of rest and working hours is maintained.

14. Every employee is respected in the Company. Discrimination on the basis of race, sex, nationality, language, origin, family or social status, age, sexual orientation, disability, health condition, ethnic origin, membership of a political party or association, religion, belief, convictions or views is not tolerated. Employees are not discriminated against in recruitment, remuneration, training, promotion, termination of employment or retirement.

15. Employment relations in the Company are based not only on respect but also on honesty. They are also consistent with the laws in force in the country. The employer seeks stable employment relations and does not conclude short-term contracts with employees merely to avoid obligations.

16. The Company does not tolerate harsh or inhuman treatment and prohibits any violence (physical or psychological), threats of violence, harassment, abuse or other actions that humiliate or hurt a person.

17. The Company seeks, to the extent possible and insofar as the specifics of the transport sector allow, to maintain gender balance and supports the principles of equality and inclusion.

18. The Company respects every employee and values every person's contribution to the Company's activities. The Company pays particular attention to human rights and their monitoring. The key principles followed by the Company are set out in the Company's Human Rights Policy.

19. Communication with employees in the Company takes place through commonly agreed and generally acceptable communication channels. However, where necessary, an employee may express a need to communicate in another form or language that is more understandable, clear and acceptable to them.

20. The Company accepts employees' thoughts, ideas and proposals related to the Company's activities, working conditions, their improvement and the creation of well-being generally within the Company and in communication with stakeholders.

21. Employees have the right and the opportunity to report anonymously on possible violations of human rights, labour law, ethics and other matters 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 own data and the data of employees and partners; therefore, employees are informed and trained on how to work in a manner that protects not only data related to the Company's activities, but also their own data.

This Code is public and available on the Company's website [www.gby.lt](http://www.gby.lt), 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 ethical employment principles in the Company. Every person working in or with our Company is familiarised with this document so that they know their rights and our commitment to respect them.

You may report any questionable activities or breaches in the field of ethical employment by contacting the person responsible for this Code directly, by writing to [trust@gby.lt](mailto:trust@gby.lt), 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.