

## **CODE OF BUSINESS ETHICS OF UAB “VILNIAUS PREKYBA”**

We are a large business Group with an important presence in the Baltic States and Central European markets, therefore we understand our responsibility for our actions affecting our customers, employees, society and the environment around us.

In all markets and countries where we operate, we strive to develop our business in a fair and transparent manner and to maintain high standards of business ethics. We want all companies in our Group to adhere to these standards.

The directions of our responsible activities are defined by the Code of Business Ethics which discloses how we develop business relationships and adhere to standards of conduct in our dealings with employees, customers, partners, suppliers, government and other authorities, and the general public.

### **WHO IS THE CODE OF ETHICS APPLICABLE TO?**

The Code of Business Ethics is addressed to all Group employees in all markets, countries and areas in which “Vilniaus Prekyba” or its companies operate (all companies that comprise the “Vilniaus Prekyba” Group, hereinafter the “Company” or “Companies”).

### **ENFORCEMENT OF THE CODE**

Taking into account the best practices of business leaders, the Company provides information channels through which employees, customers, business partners, suppliers, and other stakeholders may report conduct that violates the principles set forth in the Code of Business Ethics.

### **BUSINESS ETHICS**

We conduct our business with integrity, ethics and compliance with all legal acts. This principle is followed by all companies in the Group.

In line with business ethics, we create added value for our employees, customers, shareholders, suppliers and partners, and society.

We respect human rights and advocate healthy working conditions, and do not tolerate corruption.

### **HONEST BEHAVIOUR IN THE COMPANY**

#### **RELATIONS WITH EMPLOYEES**

Our goal is to recruit, foster and retain talented and professional employees, and earn their loyalty. We strive to create and continually improve a safe and healthy work environment, create equal opportunities to become members of our team, develop as professionals, achieve good performance results, and be continuously involved in achieving our common goals.

#### **FAIR WORKING RELATIONS**

We comply with legal acts regulating labour relations. Seeking to be an attractive employer for current and future employees, we act appropriately. Our employees are chosen according to their competence, professionalism and values. All employees are trained to perform their duties and tasks and opportunities for improvement are present. We adequately remunerated for work and the results achieved, taking into account the responsibilities of the employees and the situation in the labour market. We part with our employees honourably.

#### **EQUALITY**

We adhere to the principle that respect is the basis of personal and business relationships. Our goal is to bring together a team of people of all nationalities, cultures, races, religions, political opinions, material backgrounds, education, age, sexual orientation, marital status, gender, appearance,

physical and intellectual abilities. We strive to create a work environment in which individuals are respected, regardless of individual differences, and employee performance is judged on performance results and behaviour based on values.

We do not tolerate discrimination, humiliation, harassment, violence, harassment of employees or anyone else we deal with in our activities. We treat all employees with respect and fairness.

#### HEALTH AND SAFETY

We strive to provide safe and healthy conditions at workplaces and to constantly improve them, we ensure the safety of work processes, we take into consideration the factors harmful to health or hazardous to the work environment, and implement preventive measures. Each Company's work environment is subject to the safety rules applicable to it, as determined by law and internal legal acts of the Company. Every employee must be aware of and adhere to his or her work environment and applicable safety rules.

#### PRIVACY OF EMPLOYEES

We respect the privacy of our employees. We collect, store and use personal information about our employees in accordance with the legal acts. We adhere to the principle that an employee's personal activities must not conflict with the Company's pursuit of legality and sustainability. In compliance with the law, the Company may review, regularly inspect and store all data, information and correspondence, monitor the employee's workplace and other locations within the Company, the employee's use of communication facilities provided by the Company.

#### ALCOHOL AND OTHER PSYCHOTROPIC SUBSTANCES IN THE WORKPLACE

We strive to create a safe and healthy environment for all our employees, partners and customers. Employees are prohibited from consuming alcohol, illegal drugs, or being intoxicated with alcohol, narcotics, or drug abuse at work.

#### CONFLICTS OF INTEREST

We do our best to ensure that our employees do not create conflicts of interest and that they express their interests openly and honestly. Employees must avoid activities that are contrary to the Company's legitimate interests or that raise doubts about the employee's loyalty. An employee must notify his or her manager if he or she intends to become employed, engage in any other occupation, become a member of the management bodies or engage in any other activity outside the Company's companies or organisations;

Employees should not have direct subordination over family members, relatives or any other persons with whom the employee has a close personal relationship. The employee should not have to make decisions at work which may directly impact the position of those persons.

#### ENTERTAINMENT AND GIFTS

We adhere to anti-corruption laws and regulations, therefore it is unacceptable for us, under any circumstances, to have our companies involved in non-transparent relationships with business or governmental institutions, or in their extreme form – bribery. A bribe may be a financial or other kind of giving or receiving valuable reward, therefore, in some circumstances, gifts and entertainment may be considered bribes.

We do not offer or accept gifts, cash, or hospitality aimed to encourage or reward any decision, but employees may accept and offer low value business gifts that are consistent with the hospitality and business relationship. Giving or receiving money, loans, support, travel, job offers, compensation,

discounts on merchandise or services or any other valuable reward shall not be considered gifts of hospitality and business communication.

#### ASSETS OF GROUP AND COMPANIES

The assets and resources of the Group and its companies are intended to meet the legitimate business objectives of the Group and its companies. In cases where employees are permitted to use the Company's assets for personal purposes, employees must ensure that the employee's activities are not contrary to law, public order and good morale, do not harm the Company's business interests and do not deplete the Company's resources.

#### INTELLECTUAL PROPERTY

Licensed or owned intellectual property is one of the most valuable assets of the Group and its companies. Therefore, employees must protect the intellectual property rights of their company. Intellectual property covers everything that employees create in the company during their working hours, at the company's expense or while performing their duties. The Group and its companies own the rights to everything that employees create while working for the company.

#### TECHNOLOGIES

We use only legally acquired software. Computer systems and equipment are intended for use in work-related purposes. Employees are not permitted to download from the Internet or store illegal materials or programs of an inappropriate content on employees' computers and on other corporate media.

#### CONFIDENTIAL INFORMATION

Companies collect and store confidential information about the activities of the Group and its affiliated companies, employees, customers and business partners. It is the duty of every employee to protect such confidential information from disclosure.

Employees can only share this non-public information with co-workers who need to know that information for work purposes. This information may be disclosed to third parties only if it is necessary for the Company's operations or is required by applicable legal acts to ensure the confidentiality of the recipients of the information.

Personal data is collected, stored, used and kept strictly in accordance with the legal acts.

#### BUSINESS AND FINANCIAL DOCUMENTS

Our goal is to ensure that all our business and financial documents are accurate.

The accuracy and completeness of business and financial records is the responsibility of each employee, not just of the staff of the accounting and finance departments. Company employees are strictly prohibited from falsifying documents, distorting or concealing the true nature of deals or transactions. Staff shall ensure that all reports submitted to the supervisory authorities are fair, accurate and timely.

#### HONEST CONDUCT IN THE COMMUNITY

Our goal is to ensure sustainable, long-term and successful business by aligning the interests of shareholders, the company, employees, customers, business partners and the general public. We want to recruit, foster and retain talented and professional employees and earn their loyalty. We communicate with a variety of stakeholders: clients, business partners, competitors, shareholders, state institutions, the media, communities, we are open to the public and the media, and other

stakeholders. Our communications and cooperation must be transparent and within the established confidentiality.

#### RELATIONS WITH CUSTOMERS

Our goal is to be the first choice for our customers. This means that we work to meet the needs and expectations of our customers, while being honest with our customers.

Customer is the most important person in our Company. We look forward to receiving an evaluation of our work from our clients. We take their comments into consideration and react quickly.

#### RELATIONS WITH BUSINESS PARTNERS

Our goal is to build constructive and mutually beneficial relationships with business partners. Therefore, we communicate in a constructive way, respecting business ethics and keeping in mind our goals.

We operate on the basis of trust and agreement.

We are ready to establish relations with new business partners.

We expect business partners to compete fairly in the field of their business.

We base our business decisions and actions on the principle of maximum benefit to our Company, our customers and our shareholders. Therefore, decisions cannot be made for personal purposes or interests, the latter does not have to influence our independent and rational judgment.

Business partners are not allowed to offer gifts or other benefits to our employees that may affect the objectivity of the Company's employees in terms of their business partners.

We keep confidential information entrusted to the Company by business partners and use it only to the extent agreed with the business partners or required by law.

#### RELATIONS WITH COMPETITORS

We do not seek to gain a competitive advantage through illegal or unethical means. We operate in competitive markets, therefore we are constantly competing in compliance with legal acts regulating competition and fair market.

Knowing our competitors is an important part of our business, ensuring our competitiveness in the market. We collect, use and share information about our competitors only through legal and ethical means.

#### RELATIONS WITH STATE AUTHORITIES AND REPRESENTATIVES OF THE GOVERNMENT

We operate under the laws of each country. Consistent compliance with the law and open and transparent communication with the state authorities ensure our stable operation. We strive to maintain good relations with the supervisory authorities of the countries where we operate.

#### INQUIRIES AND INSPECTIONS BY STATE AUTHORITIES

We provide information to all state authorities in a timely and appropriate manner, subject to the legal acts. Our staff is responsible for ensuring that the information, statements, and approvals provided to governmental institutions are true and complete.

We create appropriate conditions for government officials to audit the Company's activities and cooperate in the inspections. If any discrepancies in the Company's performance are identified, we promptly rectify them and take steps to prevent any such discrepancies from occurring in the future. Our employees are prohibited to hinder government officials from performing their statutory duties and from resisting their legitimate claims.

#### BRIBING

We do not tolerate offering or accepting bribes or any other form of improper rewards or the direct or indirect giving or offering of any valuable reward or benefit.

#### RELATIONS WITH THE COMMUNITY

Our business is directly related to the daily lives of many people. Being close to the population as suppliers of goods and services, we are also part of communities. We strive to foster a good neighbourhood, to be reliable partners and to be active participants in public life.

#### ENVIRONMENTAL PROTECTION

We recognize our responsibility for the protection of human health, the environment and natural resources.

We conduct our day-to-day operations in compliance with environmental laws, regulations and permits. We take into account the impact of our business decisions on operations we are involved in carrying out.

#### SUPPORT

We have a long-term sponsorship policy and, as representatives of the business community, are involved in shaping the future of the countries and communities in which we operate.

We support projects that meet our ethical standards, values, and company priorities. We do not support projects related to social exclusion and discrimination, political initiatives and the promotion of religious beliefs

#### POLITICAL ACTIVITIES

We are not involved in politics. Employees of the Group and its companies may not, on behalf of the Group or its companies, provide or support, directly or indirectly, political parties in the form of political support.

We respect the political views of our employees and do not limit their personal political activities.

Our employees are not allowed to use the reputation or resources of any of the Companies, including working hours, for the purposes of their political activities or political interests.

#### RELATIONS WITH SHAREHOLDERS

We protect the interests of our shareholders and strive to be profitable while developing a sustainable business. Our goal is to create long-term and sustainable value for our shareholders. We provide our shareholders with transparent and consistent information about the financial position of the Group and companies and about key changes in our operations that may affect their value. We are constantly in touch with our shareholders always taking their expectations into account and answering the emerging questions.