

APPROVED BY  
the Order No. 2018/VK-41 of 19 June 2018 of  
P. Žukas, CEO of Grainmore UAB

## **GRAINMORE UAB CODE OF CONDUCT**

1. Grainmore UAB operates in accordance with this Code of Conduct, taking responsibility for its actions and their impact on clients, employees, society, and the environment.

2. In all markets and countries where it operates, Grainmore UAB is committed to conducting its activities with honesty and transparency, following high standards of business ethics.

3. This Code of Conduct defines the principles of responsible activity, outlining how the Company establishes business relationships and adheres to standards of conduct when engaging with employees, clients, partners, suppliers, competitors, state authorities, law enforcement, other institutions, organisations, and the public.

### **I. APPLICABILITY OF THE CODE OF CONDUCT**

4. This Code of Conduct applies to all employees of Grainmore UAB across all markets, countries, and regions where the Company operates.

### **II. ENSURING COMPLIANCE WITH THE CODE**

5. Grainmore UAB, following best practices, provides communication channels for employees, clients, business partners, suppliers, and other stakeholders to report any behaviour that violates the principles outlined in the Code of Conduct.

### **III. ACTIVITY AND BUSINESS ETHICS**

6. Grainmore UAB conducts its activities with honesty, integrity, and in full compliance with all applicable laws. By adhering to ethical business practices, we create added value for our employees, clients, shareholders, suppliers, partners, and society as a whole.

7. We respect human rights, promote healthy and safe working conditions for employees, and maintain a zero-tolerance policy toward corruption.

### **IV. RELATIONS WITH EMPLOYEES**

8. Grainmore UAB aims to recruit, develop and retain skilled, responsible professionals, fostering their loyalty. We strive to create and continuously improve a safe, healthy work environment, provide equal opportunities to join our team, support professional growth, encourage achieving good results and constantly engage in achieving shared goals.

### **V. FAIR EMPLOYMENT RELATIONS**

9. We follow all legal regulations governing employment relations. We aim to be an attractive employer for current and prospective employees by selecting candidates based on their competence, professionalism, and values.

We provide training to each employee to help them perform their duties effectively and offer opportunities for improvement. We fairly reward work and achievements, considering employees' responsibilities and current labour market conditions. In employment relations, we adhere to the following legal principles: legal certainty; protection of legitimate expectations; defence of labour rights; ensuring safe and healthy working conditions; stability of employment relations; freedom to choose one's work; fair remuneration for work; equality among all labour law subjects, regardless of gender, sexual orientation, race, nationality, language, origin, social status, religion, intention to have a child (children), marital and family status, age, beliefs or views, affiliation to political parties and associations; any circumstances unrelated to an employee's professional qualifications; freedom of association; the right to engage in collective bargaining and take collective action.

10. In all cases, we aim for a respectful and honourable termination of employment relations with our employees.

## **VI. EQUALITY**

11. We uphold the principle that respect is fundamental to both personal and business relations. Our goal is to build a team that includes individuals of diverse nationalities, cultures, races, origins, religions, political beliefs, social and economic statuses, education levels, ages, sexual orientations, marital statuses, genders, appearances, and abilities—both physical and intellectual. We strive to create a work environment where all individuals are respected, regardless of their differences, and where employees are valued based on their efforts, achievements, and adherence to our core values.

12. We do not tolerate discrimination, humiliation, harassment, violence, or insults directed at employees or any individuals we encounter in our activities. We are committed to treating all employees with respect and fairness.

## **VII. HEALTH AND SAFETY**

13. We strive to provide and continually improve safe and healthy working conditions. We ensure the safety of work processes by considering health hazards and dangerous factors in the work environment and implementing preventive measures as necessary. The working environment at Grainmore UAB is subject to safety regulations established by laws, other normative legal acts, and our internal policies. Each employee must be aware of and comply with the safety rules applicable to their work environment.

## **VIII. EMPLOYEE PRIVACY**

14. We respect the privacy of our employees. We collect, store, and use their personal data in accordance with legal requirements. We adhere to the principle that an employee's personal activities must not conflict with Grainmore UAB's commitment to ensuring the legality and continuity of our operations. In compliance with the law, Grainmore UAB reserves the right to review, regularly check, and store all data, information, and correspondence, as well as to monitor the employee's workplace and the use of communication tools provided by the Company.

## **IX. ALCOHOL AND OTHER PSYCHOTROPIC SUBSTANCES IN THE WORKPLACE**

15. We aim to create a safe and healthy environment for all employees, partners, and clients. Employees are prohibited from possessing or using alcohol and illegal narcotic substances, as well as from being under the influence of alcohol, narcotics, toxic substances, or improperly used medications while at work. An employee's appearance while intoxicated or under the influence of narcotic, toxic, or psychotropic substances during work hours, unless such intoxication results from the performance of professional duties, will be considered a serious violation of work duties.

## **X. CONFLICTS OF INTEREST**

16. We aim to ensure that employees avoid conflicts of interest and express their interests openly and honestly. Employees must refrain from engaging in activities that contradict the legitimate interests of Grainmore UAB or raise concerns about their loyalty. If an employee intends to seek additional employment, engage in other professional activities, join management bodies, or participate in any active pursuits outside of Grainmore UAB, they must notify their manager to determine whether such activities may lead to a conflict of interest.

17. Employees should not supervise family members, relatives, or others with whom they have a close personal relationship. Additionally, employees must avoid making decisions at work that could directly impact the employment status of the aforementioned individuals.

## **XI. ENTERTAINMENT AND GIFTS**

18. We comply with all laws and regulations related to the prevention of corruption, and we consider it unacceptable for Grainmore UAB to engage in non-transparent relationships with business or state institutions, including its extreme form - bribery. A bribe may involve the giving or receiving of financial or other valuable considerations. Therefore, gifts and entertainment can be deemed bribes under certain circumstances.

19. We do not offer or accept gifts, money, or hospitality to influence or reward any decision. However, employees may accept and give small business gifts that are appropriate for fostering hospitality and maintaining business relationships. Any exchange of money, loans, support, travel, job offers, compensation, discounted goods, services, or other valuable considerations should not be classified as gifts of hospitality or business relationships.

## **XII. COMPANY ASSETS**

20. The assets and resources of Grainmore UAB are intended solely for the legitimate business objectives of the Company. When employees are permitted to use Grainmore UAB assets for personal purposes, they must ensure that their activities comply with the law, public order, and ethical standards, do not harm the business interests of Grainmore UAB and do not waste the Company's resources.

### **XIII. INTELLECTUAL PROPERTY**

21. The intellectual property licensed or owned by Grainmore UAB is one of the most valuable assets of the Company. Therefore, employees are responsible for protecting the intellectual property rights of Grainmore UAB. Intellectual property encompasses all creations made by employees during working hours, at the expense of Grainmore UAB, or while fulfilling their duties/staff responsibilities. Grainmore UAB retains ownership rights to everything developed by employees during their employment with the Company.

### **XIV. TECHNOLOGIES**

22. We only use legally purchased software. Computer systems and equipment are designated for purposes directly related to the work of Grainmore UAB. Employees are prohibited from sending or storing illegal or inappropriate content or software from the Internet on their computers or any other Company media.

### **XV. CONFIDENTIAL INFORMATION**

23. Grainmore UAB collects and stores confidential information regarding the Company's operations, employees, clients, and business partners. It is the responsibility of each employee to protect such confidential information from disclosure.

24. Employees may share non-public information only with co-workers who require that information for work-related purposes. Disclosure to third parties is permitted only when necessary for the Company's operations or required by applicable legislation, provided that the recipients of the information are obligated to maintain its confidentiality. Personal data is collected, stored, used, and protected in strict compliance with legal regulations.

### **XVI. BUSINESS AND FINANCIAL DOCUMENTS**

25. Grainmore UAB aims to ensure the accuracy of all business and financial documents of the Company.

26. The accuracy and completeness of business and financial documents are the responsibility of every employee, not just those in the accounting and finance departments. Grainmore UAB employees are strictly prohibited from falsifying documents or distorting or concealing the true nature of transactions or operations. Employees must ensure that all reports submitted to supervisory authorities are accurate, correct, and submitted in a timely manner.

### **XVII. HONEST BEHAVIOUR IN THE COMMUNITY**

27. Grainmore UAB is dedicated to ensuring sustainable, long-term success by balancing the interests of shareholders, the Company, employees, clients, business partners, and society. We aim to recruit, develop, and retain talented professionals while earning their loyalty. We engage with various stakeholders, including clients, business partners, competitors, shareholders, state institutions, media, and communities, maintaining openness with the public and media. Our communications and relationships must be transparent while respecting established confidentiality limits.

## **XVIII. RELATIONS WITH CLIENTS**

28. Grainmore UAB aims to be the first choice for its clients. This means that we work to meet their needs and expectations while maintaining honesty.

29. The client is the most important person at Grainmore UAB. We encourage our clients to evaluate our work and efforts.

## **XIX. RELATIONS WITH BUSINESS PARTNERS**

30. Grainmore UAB aims to build constructive and mutually beneficial relations with our business partners. To achieve this, we communicate professionally, adhere to business ethics, and remain focused on our goals.

31. We operate on the basis of trust and commitment to our agreements. We are open to establishing relationships with new business partners and expect them to engage in fair competition within their respective fields.

32. We base our business decisions and actions on the principle of maximising benefits for Grainmore UAB, our clients, and our shareholders. Therefore, decisions must not be made for personal purposes or interests, and personal interests should not influence the independent and rational assessment of Grainmore UAB.

33. Business partners should not offer gifts or other benefits to employees of Grainmore UAB that could compromise the objectivity of our employees in their dealings with business partners.

34. We protect the confidential information entrusted to Grainmore UAB by our business partners and use it only as agreed upon with the partner or as required by law.

## **XX. RELATIONS WITH COMPETITORS**

35. We do not pursue competitive advantage through illegal or unethical means. Operating in competitive markets, we consistently adhere to the laws governing competition and fair market practices.

36. Understanding our competitors is essential to maintaining our competitiveness in the market. We collect, use, and share information about our competitors solely through legal and ethical means.

## **XXI. RELATIONS WITH STATE INSTITUTIONS AND THEIR REPRESENTATIVES**

37. Grainmore UAB complies with all applicable laws in its operations. Adhering to these laws and maintaining open and transparent communication with authorities contribute to the stable functioning of Grainmore UAB. We aim to maintain positive relationships with the regulatory authorities in the countries where we operate.

## **XXII. INQUIRIES AND INSPECTIONS BY STATE AUTHORITIES**

38. We provide information to all state authorities in a timely and appropriate manner, in accordance with legal requirements. Employees of Grainmore UAB must ensure that the information, statements, and confirmations submitted to state authorities are accurate and complete.

39. We ensure suitable conditions for government officials to inspect the activities of Grainmore UAB and cooperate during these inspections. If any discrepancies in our operations are identified, we immediately correct them and implement measures to prevent similar issues from occurring in the future.

40. Employees of Grainmore UAB are prohibited from obstructing government officials in the performance of their legally established duties or opposing their legitimate requests.

#### **XXIII. BRIBERY**

41. We do not tolerate the offering or acceptance of bribes or any other form of improper benefit, nor the direct or indirect provision or offer of any valuable consideration or benefit of any kind.

#### **XXIV. RELATIONS WITH COMMUNITY**

42. Grainmore UAB's business is directly connected to the daily lives of many people. As suppliers of goods, we engage closely with residents and become integral members of the communities we serve. We strive to cultivate positive relationships, act as reliable partners, and actively participate in public life.

#### **XXV. ENVIRONMENTAL PROTECTION**

43. We recognise our responsibility to protect people's health, the environment, and natural resources. We conduct our daily operations in compliance with environmental laws, regulations, and permits. Additionally, we consider the impact of our business decisions.

#### **XXVI. SUPPORT**

44. We are committed to a long-term support policy and actively participate as representatives of the business community in shaping the future of the communities where we operate. We support projects that align with our ethical standards, values, and company priorities, and we do not support initiatives that promote social exclusion, discrimination, political agendas, or the promotion of religious beliefs.

#### **XXVII. POLITICAL ACTIVITY**

45. We do not engage in politics. Employees of Grainmore UAB are prohibited from providing direct or indirect political support or funding to political parties on behalf of the Company. We respect our employees' political views and do not restrict their personal political activities. However, employees may not use the reputation or resources of Grainmore UAB, including working hours, for their political activities or interests.

#### **XXVIII. RELATIONS WITH SHAREHOLDERS**

46. We protect the interests of Grainmore UAB's shareholders by aiming for profitable operations while developing a sustainable business model. Our goal is to achieve long-term and sustainable growth in shareholder value. We provide shareholders with transparent and timely information about the financial condition of Grainmore UAB, including significant changes in our activities that may impact the value of their shares. We maintain ongoing communication with our shareholders, taking their expectations into account and addressing any questions they may have.

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