

APPROVED BY
the Order No. 2018/VK-42 of 19 June 2018 of
P. Žukas, CEO of Grainmore UAB

GRAINMORE UAB

CORRUPTION PREVENTION POLICY

I. GENERAL PROVISIONS

1. The objective of the Corruption Prevention Policy (hereinafter – the Policy) is to define the responsibilities of Grainmore UAB (hereinafter – the Company) and its employees regarding the prevention of corruption, as well as to establish guidelines to ensure compliance with these responsibilities.

2. Definitions used in the Policy:

Conflict of interest – a situation in which a person, in the course of performing their duties or work, must carry out an action or activity that relates not only to their professional responsibilities but also involves their private interests.

Bribery – the act of offering, giving, permitting, requesting, accepting, or receiving a financial or other benefit with the intent of encouraging improper performance of duties or functions, or exploiting a person's position.

Corruption – the abuse of entrusted power for personal gain.

Corruption prevention – the process of identifying and eliminating the causes and conditions that enable corruption, including developing and implementing a system of effective measures and influencing individuals to prevent criminal acts of a corrupt nature.

Hospitality – a considerate and supportive approach to welcoming, hosting, or serving individuals, which includes both tangible elements (such as food, beverages, and accommodation) and intangible elements (such as service quality, atmosphere, and image).

3. The Policy applies to all employees of the Company, regardless of their positions or type of employment contract.

4. Objectives of the Policy:

- a) to strengthen compliance with the principles of openness and transparency within the Company;
- b) to enhance the legal awareness and accountability of the Company's employees regarding corruption prevention;
- c) to reduce the probability of corruption;
- d) to strengthen the trust of clients, partners, and the public in the Company's activities.

5. The Company strictly follows this Policy, conducting all activities with integrity and ethics. Bribery and corruption are not tolerated, and the Company is committed to conducting all

transactions professionally, ethically, and transparently.

6. Bribery is defined as any incentive or reward that is offered, promised, or provided with the intent to obtain a commercial, contractual, or personal benefit, or to gain an advantage over other business partners.

II. COMMITMENTS TO CORRUPTION PREVENTION

7. The Company does not tolerate corruption in any form and is committed to implementing preventive measures to combat any instances of corruption. The Company adheres to the following rules:

7.1. Compliance with legal provisions: the Company conducts its activities in full compliance with all applicable legal requirements. In situations where this Policy, laws, or other legal acts do not specify particular standards of conduct, the Company commits to acting with the highest standards of reliability, honesty, and transparency.

7.2. Gifts and hospitality: the Company permits giving and receiving only modest business gifts and hospitality that adhere to standard business practices and transparency standards, remaining symbolic and representative in nature. The Company strictly prohibits any gifts, payments, or hospitality that could influence or reward decision-making or seek to gain favour or preferential treatment in Company-related matters. When accepting gifts, employees must assess whether these actions could be intended to have an illegal effect. This Policy does not prohibit the Company from organising or attending regular events with third parties. However, in all cases, it must be evaluated whether such gifts or events are appropriate, justified, and align with their intended purposes.

7.3. Information disclosure and transparent accounting: the Company ensures that its activities and objectives are transparent and clearly declared, with its key documents made publicly available to facilitate sufficient information disclosure. Despite this obligation to transparency, the Company protects trade secrets, confidential information, and the personal data of clients and partners, refraining from disclosing such information to unauthorised individuals. The Company's accounting practices must be accurate and must correctly reflect all economic transactions and events, in compliance with applicable laws and accounting standards.

7.4. Incentive and gratitude fees: the Company does not pay or accept any incentive or gratitude fees from other entities. All employees must avoid any actions that could create the impression that the Company pays or accepts such fees.

7.5. Donations (support or charity): donations to any political institution or charitable organisation are permitted only with the prior approval of the Company's Board.

7.6. Abuse of official position: it refers to the misuse of the rights, duties, and powers granted by one's official role, as well as applicable laws, staff regulations, or other internal legal acts of the Company, in a manner that contradicts the interests of the position and the Company, the principles and objectives of its activities, as well as exceeding the granted authority. All employees must perform their duties honestly and must not use their official position for personal or related benefit, nor engage

in any activities that could harm the Company.

7.7. Trading in influence (impact): trading in influence (impact) is not tolerated within the Company. This refers to any illegal actions that use one's duties, powers, or other potential influences to sway an institution or organisation, compelling them to act or refrain from acting in the exercise of their powers, whether legally or illegally. The Company does not tolerate illegal lobbying in any form.

7.8. Purchases: the Company ensures that all purchases are conducted transparently and in compliance with the principles of equality, non-discrimination, mutual recognition, proportionality, and impartiality while using the Company's funds rationally. Purchases and supplier selections are made in accordance with applicable legal requirements. In cases where legal regulations do not govern specific purchases, these transactions must still adhere to the aforementioned principles, ensuring equal and non-discriminatory conditions throughout both the purchasing process and the execution of contracts. If it is determined that the actions or conduct of third-party representatives violate the provisions of this Policy, the Company reserves the right to take appropriate measures, including terminating contractual obligations in accordance with established legal procedures.

7.9. Conflict of interest: the Company's business decisions and actions are guided by the principle of maximizing benefits for the Company. Employees are expected to avoid any conflicts of interest that could negatively impact their ability to perform their duties and functions impartially and objectively. Employees commit to not seeking personal benefits for themselves or their relatives, covering personal expenses at the Company's expense, using their positions to advance personal interests or those of related parties in the Company's transactions, or exploiting the Company's name and reputation for personal gain.

7.10. Prohibition of bribery: the Company declares that it does not tolerate any form of bribery. It does not directly or indirectly offer, give, or permit bribes to be given, nor does it request or accept them. If an employee detects any signs of bribery within the Company or receives a request to give or an offer to accept a bribe, they must immediately inform their direct manager.

7.11. Nepotism: employees involved in making employment decisions must not show favouritism toward family members, relatives, or other close associates. The Company is committed to hiring only the best specialists in their respective fields, and all candidates are evaluated solely based on their professional qualifications, competence, and achievements, without exception.

III. THE PROCEDURE FOR INVESTIGATING REPORTS OF POSSIBLE CASES OF CORRUPTION

8. Reports on potential cases of corruption may be submitted in the following ways:

8.1. By email: info@grainmore.com.

8.2. By mail: Grainmore UAB, Plačioji g. 27, Senieji Trakai.

8.3. In person: by visiting Grainmore UAB at Plačioji g. 27, Senieji Trakai, and submitting a report directly.

9. Reports on cases of corruption must be clear, legible, and understandable, and should be signed if they are not submitted anonymously. Reports should aim to describe the violation in as much detail as possible, including the location, time, and other relevant information about the violator and the nature of the violation.

10. Anonymous reports may be submitted.

11. Only reports related to the direct activities of Grainmore UAB will be investigated.

12. Upon receiving a report, it will be registered and forwarded to the CEO of the Company. The CEO will then establish a commission to investigate the report for each specific case (hereinafter – the Commission). The Commission shall not include any employee whose actions or inactions are the subject of the complaint. Such individuals will not participate in the investigation process or in making decisions related to the report.

13. The employee whose actions or inactions are the subject of the complaint is prohibited from disclosing any information that could identify the person who submitted the report.

14. The Commission is responsible for retaining the report and all documentation related to the investigation. The Chairman of the Commission must ensure that these documents are not accessible to the employee whose actions or inactions are the subject of the complaint, nor to any other employees who do not require this information to perform their duties.

15. Within 15 business days from the date of receipt of the report, the applicant who has provided their personal data will be informed of the results of the verification of the information provided, as well as any sanctions imposed on the violator.

IV. DUTIES AND RESPONSIBILITIES OF EMPLOYEES

16. Employees have the following duties:

16.1. to inform about any manifestations of corruption within the Company;

16.2. to avoid any actions that may lead to a violation of this Policy;

16.3. to report suspected acts of bribery and corruption, attempts to commit such acts, or any suspected or actual violations of this Policy, as well as breaches of standards established within the internal system.

17. A violation of this Policy is considered a breach of labour discipline, subjecting the employee to disciplinary action.

18. The Company ensures that there will be no discrimination against employees who refuse to participate in corrupt activities or who honestly report suspicions of actual or potential acts of corruption.

V. FINAL PROVISIONS

19. To ensure the effective implementation of this Policy and to promote the prevention of violations, transparency, and trust, the Company establishes accessible measures for reporting violations and obtaining necessary information related to its enforcement. Employees and other

individuals, including natural and legal persons, are encouraged to anonymously report any suspected violations of this Policy using the methods outlined in Clause 8. The Company guarantees complete confidentiality, data protection, non-disclosure, and protection against retaliation for all individuals who report.

20. The Company ensures that all reported violations of this Policy will be investigated.

21. Upon detecting actions that violate the provisions of this Policy or exhibit signs of corruption, the Company will take immediate disciplinary measures. If signs of a criminal act are identified, the Company will notify the appropriate law enforcement authorities.

22. This Policy applies directly to the Company. Given the specific nature of the Company's activities, the Company may establish additional commitments to corruption prevention, including mechanisms and procedures for compliance, implementation, supervision, and control, when valid reasons exist.
