

APPROVED

By the Resolution of the Board of AB Grigeo
of 6 April 2023
(Minutes No 23/03 of the Board Meeting of
6 April 2023)

CODE OF ETHICS OF AB GRIGEO GROUP

1. GENERAL PROVISIONS

- 1.1. The Code of Ethics of AB Grigeo Group (the '**Code of Ethics**') describes the values, principles and standards of conduct that guide the AB Grigeo Group companies in their business and in the organisation of their routine corporate activities.
- 1.2. The Code of Ethics applies to AB Grigeo Group, which consists of AB Grigeo (the '**Company**') and its subsidiaries, including but not limited to UAB Grigeo Packaging, UAB Grigeo Baltwood, AB Grigeo Klaipėda, UAB Grigeo Recycling, SIA Grigeo Recycling and AT Mena Pak (the '**Group**'). The Code of Ethics is intended for all employees of the Group, members of the management and supervisory bodies and committees of the Group companies.
- 1.3. The Code of Ethics informs the stakeholders of the principles and values that the Group's companies are guided by when establishing and maintaining relations with the Group's partners (customers, suppliers, public authorities, etc.), as well as of the conduct expected from the Group's partners.
- 1.4. Detailed provisions on the implementation of this Code of Ethics are set out in the Group's policies and in the internal regulations of the Group companies, which determine the rights and obligations of the Group company and its responsible employees in implementing the provisions of the Code of Ethics.

2. GROUP VALUES

- 2.1. The Group's business strategy is focused on our long-term mission of creating a circular future. Its implementation and the day-to-day operations of the Group companies are inextricably linked to four core values that underpin the Group's conduct and culture.



Responsible 360°

Whatever we do, let's always think about the impact on our environment because it's our home.
The best measurement of our work is a satisfied client.
Working like for ourselves makes us proud with the work done.



Agile

We grow faster than the market.
Even the best result can be better.
Every investor's euro that is targeted makes us more valuable.



Professional

A preconception is eliminated while considering proposed ideas.
Knowing everything is impossible – we improve by learning and sharing a good practice.
We speak the language of numbers and facts.



Team-based

Good result is a merit of a good team.
The team is as strong as you are in it.
Before demanding from others, demand more from ourselves.

3. RESPECT FOR HUMAN RIGHTS AND FREEDOMS

- 3.1. The Group respects and guarantees human rights and freedoms as defined in the Universal Declaration of Human Rights of the UN General Assembly, the Convention for the Protection of Human Rights and Fundamental Freedoms of the Council of Europe, the conventions of the International Labour Organisation and other human rights and freedoms recognised in international and national law.
- 3.2. The Group recognises the right of the child to be protected from economic exploitation, from performing hazardous work, and from work which interferes with education or which is harmful to health or to their physical, mental, spiritual, moral or social development. The Group shall not use the labour of children under the age of 16, nor shall it work with suppliers and sub-suppliers who use the labour of children under the age of 16, and shall immediately terminate its cooperation with suppliers and sub-suppliers if it is established that they use the labour of children under the age of 16. The Group shall not employ any person below the minimum age of legal capacity under the national laws applicable to the Group company. Persons between the ages of 16 and 18 may be employed only in strict compliance with the laws.
- 3.3. The Group shall not use forced or compulsory labour.
- 3.4. The Group shall not tolerate violence, harassment, unethical and disrespectful behaviour. Any gestures, words, comments, behaviour or other actions that are intended to insult or violate a person's dignity, are intended to affect or adversely affect the person's emotional health, and/or are intended to create or actually create a hostile, degrading or offensive environment shall be unacceptable and intolerable.
- 3.5. The Group opposes all direct and indirect discrimination, harassment, discrimination on the grounds of gender, race, nationality, citizenship, language, origin, social status, faith, belief or opinion, age, sexual orientation, disability, ethnicity, health, marital or family status, intention to have a child, membership of a political party, trade union, or association, or religion.
- 3.6. The Group encourages diversity among its employees and applies the same selection criteria and conditions for recruitment, based on job-specific requirements, as well as provides the same working conditions and guarantees in the course of employment to all persons in accordance with the principles of gender equality and non-discrimination on other grounds.
- 3.7. The Group shall not pay employees salaries which are lower than provided by the laws applicable to the employment relationships, collective agreements, other labour regulations or approved remuneration schemes.
- 3.8. The Group shall compensate employees fairly for the work they perform by paying them the same remuneration for similar work or work of equal value, taking into account the individual's functions, qualification, experience, the quality of the work performed and the results achieved. The Group shall apply the same conditions for evaluating the performance of its employees, taking into account their functions.
- 3.9. The Group shall respect the right of employees to join, to form or not to join associations, including the right to form and join trade unions for the protection of their interests. Employees shall be free to engage in collective bargaining.
- 3.10. The Group shall not use, promote or permit the use of corporal punishment, violence or any other forms of psychological or physical coercion, nor shall it use a system of public warnings or punishments.
- 3.11. The Group sets the highest standards to ensure the safety and health of the Group's and its partners' employees who operate within the Group companies.
- 3.12. The Group shall provide employees with safe and healthy working conditions to prevent work-related injuries and illnesses, and encourage employees to actively contribute to the improvement of the safety and health management system.
- 3.13. The Group shall not permit persons under the influence of alcohol, narcotic, psychotropic or toxic substances to work or be present at the place of business of the Group companies.

4. TRANSPARENCY, GOOD FAITH AND ANTI-CORRUPTION

- 4.1. The Group shall comply with laws and regulations.
- 4.2. The Group shall conduct its business in a transparent and fair manner, shall not engage in practices that restrict or threaten to restrict competition, shall pay its taxes as required, and shall be transparent with regard to payments to its employees and partners.
- 4.3. Any payments or other expenses not recorded in the relevant documents shall not be allowed.
- 4.4. The Group is strongly opposed to all forms of corruption, bribery and payoff.
- 4.5. In the performance of their functions, the Group's employees shall comply with the requirements of the applicable legislation, act transparently, in good faith, impartially, in line with the principles of confidentiality and cooperation, and without abusing their rights.
- 4.6. In the performance of their work functions, Group staff members shall not accept or give gratuitous goods, services or other benefits of any type or value.
- 4.7. In order to ensure transparency and objectivity in their dealings with suppliers and business partners, the Group companies shall not accept commercial offers that raise suspicions as to their legality.
- 4.8. The Group's business processes (procurement, sales, etc.) shall be governed by approved clear and transparent procedures and other internal regulations.

5. AVOIDING CONFLICTS OF INTEREST

- 5.1. Employees of the Group, members of the supervisory and management body shall act for the benefit and in the best interests of the Group, shall avoid situations where their personal interests conflict or may conflict with the interests of the Group and/or a Group company, shall declare their private interests in a proper and timely manner, where applicable, and shall inform the Group of any conflict of interest.
- 5.2. Members of the supervisory and management bodies of the Group companies and employees shall not participate in the preparation, discussion or adoption of decisions, contracts and/or agreements or shall abstain from making relevant decisions or performing other job duties, if the duties are or may be related to his/her personal interests.
- 5.3. Members of the supervisory and management bodies of the Group companies and employees shall not confuse the assets of a Group company, the use of which has not been specifically discussed with them, with their own property, or use such assets or the information they receive as a member of a body of a Group company or as an employee of a Group company for activities which are illegal under the laws of the Republic of Lithuania or for personal benefit or the benefit of a third party.

6. RESPECT FOR THE ENVIRONMENT AND THE PUBLIC

- 6.1. In its business, the Group seeks to balance environmental, social and economic considerations in order to pursue a responsible, sustainable and circular business model based on the Group's long-term strategy.
- 6.2. The Group recognises its environmental responsibilities, as the Group's operations are likely to have an environmental impact. In order to minimise the impact and to properly manage potential risks, the Group systematically works towards better environmental performance throughout the supply chain, assesses and monitors its environmental impact, sets targets, measures and communicates progress to its stakeholders.
- 6.3. The Group's employees are required to comply with all legislation and procedures applicable to the Group companies and to ensure that all processes are carried out in an environmentally friendly manner. The Group promotes its internal culture and values by building staff competence and developing a responsible approach to environmental protection.

- 6.4. The Group respects the local environment in which it operates and strives to maintain good relations with local communities.

7. CONFIDENTIALITY

- 7.1. Employees and members of the management and supervisory bodies shall respect and protect the confidential information of the Group companies, which they have received or become aware of in connection with their functions or services, and shall not disclose it to third parties or use it for their own or other persons' personal benefit.
- 7.2. The Company shall strictly adhere to the restrictions and prohibitions on the disclosure of confidential information. The Company shall inform persons who have access to confidential information in an appropriate and timely manner of the prohibition of unauthorised disclosure of confidential information and other applicable obligations.

8. REPORTING BREACHES OF THE CODE OF ETHICS AND ENSURING ITS EFFICIENCY

- 8.1. Employees may report breaches of this Code of Ethics, as well as address any questions and complaints related to this Code of Ethics to their line manager, the HR Manager or the CEO of the Group company.
- 8.2. A criminal offence, administrative offence, breach of job duties, gross violation of mandatory professional ethics or any other offence that threatens or violates the public interest, which is being possibly prepared or committed or has been committed in any of the Group companies, may be reported through the Group's internal whistleblowing channel by e-mail to pranesejuapsauga@grigeo.lt.
- 8.3. The management of each Group company shall be responsible for the implementation of the provisions of the Code of Ethics, as well as for intolerance and prompt and fair remedy of any actions that are inconsistent with the Code.
- 8.4. The Group shall support employees who comply with the provisions of the Code of Ethics in good faith, encourage other persons to comply with the Code of Ethics, does not tolerate and reports any non-compliance with the Code of Ethics.
- 8.5. Breaches shall be addressed with in accordance with the Group's internal regulations. To examine the information, the Group's CEO may designate responsible persons or form a committee of employees having expertise and responsibilities in the given problem situation.

9. FINAL PROVISIONS

- 9.1. This Code of Ethics shall be approved and amended by the Board of the Company.
 - 9.2. The responsibility for drafting and updating the Code of Ethics shall rest with the Head of Legal of the Company.
 - 9.3. The Code of Ethics or any amendments thereto shall be submitted to the Group companies and published on the Company's web site immediately after their approval by the Company's Board. The responsibility for the publication of the Code of Ethics and its amendments shall rest with the Head of Legal of the Company.
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