

APPROVED

By the Resolution of the Board of AB Grigeo
of 24 January 2024

(Minutes No 24/02 of the Board Meeting of
24 January 2024)

EQUAL OPPORTUNITY POLICY OF AB GRIGEO GROUP

1. GENERAL PROVISIONS

- 1.1. The Equal Opportunity Policy of AB Grigeo Group (the '**Policy**') describes the main equal opportunity principles applicable by the companies of AB Grigeo Group as well as their implementation.
- 1.2. The Policy applies to AB Grigeo Group, which consists of AB Grigeo (the '**Company**') and its subsidiaries, including but not limited to UAB Grigeo Hygiene, UAB Grigeo Tissue, UAB Grigeo Packaging, UAB Grigeo Baltwood, AB Grigeo Klaipėda, UAB Grigeo Recycling, SIA Grigeo Recycling and AT Mena Pak (the '**Group**').
- 1.3. Detailed provisions on the implementation of this Policy are set out in legal opportunity policy implementation and supervision procedures adopted by separate Group companies. To give effect to the principles of this Policy, Group companies may also adopt other internal regulations implementing the provisions of this Policy.
- 1.4. Main terms used in this Policy:
 - 1.4.1. **Discrimination** – direct or indirect discrimination, harassment, instruction to discriminate against persons on the grounds of sex, race, nationality, citizenship, language, origin, skin colour, social status, faith, conviction, political or other opinion, age, sexual orientation, gender identity, disability, ethnicity, or religion.
 - 1.4.2. **Equal Opportunities** – the implementation of human rights enshrined in international instruments on human and civil rights as well as laws of the Republic of Lithuania, irrespective of sex, race, nationality, citizenship, language, origin, skin colour, social status, faith, conviction, political or other opinion, age, sexual orientation, gender identity, disability, ethnicity, or religion.
 - 1.4.3. **Harassment** – an unwanted conduct related to a person's sex, race, nationality, citizenship, language, origin, social status, faith, conviction or other opinion, age, sexual orientation, disability, ethnicity, or religion, which occurs with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, or offensive environment.

2. MAIN PRINCIPLES OF EQUAL OPPORTUNITIES

- 2.1. Any direct or indirect discrimination, harassment, sexual harassment, instruction to discriminate against persons on the grounds of sex, race, nationality, citizenship, language, origin, skin colour, social status, faith, conviction, political or other opinion, age, sexual orientation, gender identity, disability, ethnicity, religion, or any other circumstance provided for in legal acts applicable to Group companies, shall be prohibited and shall not be tolerated.
- 2.2. Group companies shall organise their activity in a way that all employees are ensured equal work conditions and equal opportunities for qualification, vocational training, retraining, practical experience, as well as equal benefits irrespective of the employees' sex, race, nationality, language, origin, social status, faith, conviction or opinion, age, sexual orientation, gender identity, disability, ethnicity, religion, or any other grounds provided for in legal acts.

- 2.3. Decisions taken by Group companies shall be based on the employees' skill, qualification, professionalism, experience, and other criteria related only to professional characteristics of an employee.

3. ENSURING EQUAL OPPORTUNITIES IN GROUP COMPANIES

- 3.1. Group companies shall ensure equal and fair opportunities for all persons to be employed in Group companies, which shall only be determined by their education, professional qualification, experience, skill, professional and personal characteristics and criteria required for proper and high quality performance of a certain job.
- 3.2. All persons aspiring to work in Group companies shall be subject to unified selection criteria and standards in accordance with the requirements applicable to a specific job, except where, by reason of the nature of particular occupational activities or the conditions in which they are carried out, such a characteristic constitutes a genuine and determining occupational requirement, provided that the objective is legitimate and the requirement is proportionate.
- 3.3. Advertisements about vacancies shall not contain requirements giving preference on the grounds of sex, race, nationality, citizenship, language, origin, social status, faith, conviction or opinion, age, sexual orientation, disability, ethnicity, or religion, or other grounds provided for in laws, except for cases specified in applicable legislation.
- 3.4. Group companies shall ensure equal pay for the same or equivalent work depending on work functions, quality, professional and business skills, taking into account the criteria and conditions provided for in internal regulations of Group companies implementing the Policy.
- 3.5. Remuneration and bonuses for work shall be established on objective criteria such as the employee's education, qualifications, experience, degree of responsibility falling to the employee, nature of their work functions, performance, and other objective criteria. When setting the remuneration for each employee working in a different country or different territories or regions of the same country, Group companies shall take into account the labour market and economic conditions in the relevant area.
- 3.6. Group companies shall ensure that criteria for selecting candidates for promotion would only relate to their personal skills, qualifications, quality of work performed by them, and personal achievements in professional area.
- 3.7. Group companies shall ensure that employees performing the same work or holding the same position have equal working conditions, as well as equal opportunities for training, professional development, retraining, or practical experience.
- 3.8. Group companies shall ensure that equal criteria are adhered to when taking a decision regarding termination of employment relations with each employee.

4. REPORTING BREACHES OF THE POLICY AND ENSURING ITS EFFICIENCY

- 4.1. Employees of the Group companies and candidates to vacancies in Group companies who believe that their opportunities have been breached or they have been discriminated against, shall have the right to file a complaint to the Group company or a competent authority.
- 4.2. Breaches of this Policy may be reported through the Group's internal whistleblowing channel by e-mail to pranesejuapsauga@grigeo.lt.
- 4.3. Breaches shall be addressed in accordance with the Group's internal regulations. To examine the information, the Group's CEO may designate responsible persons or set up a committee of employees having expertise and responsibilities in the given problem situation.
- 4.4. All information related to the filed complaint on a breach of equal opportunities shall be deemed confidential and may not be disclosed to third persons unrelated to the alleged breach or its investigation.

- 4.5. Group companies shall take measures to ensure that no employee is subject to discrimination, harassment, sexual harassment, or instruction to discriminate in the workplace, and that the employee is protected from persecution, adverse treatment, or adverse consequences as a reaction to a complaint or participation in legal proceedings against discrimination.
- 4.6. HR Department of the Company shall be responsible for the implementation of this Policy in Group companies as well as zero tolerance to and prompt and fair remediation of any actions inconsistent with the provisions of the Policy.

5. FINAL PROVISIONS

- 5.1. This Policy shall be approved and amended by the Board of the Company.
 - 5.2. The responsibility for drafting and updating the Policy shall rest with the Legal Department of the Company.
 - 5.3. The Policy 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 Policy and its amendments shall rest with the Legal Department of the Company.
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