

## **AKROPOLIS GROUP, UAB**

### **EQUAL OPPORTUNITIES AND DIVERSITY POLICY**

#### **1. Purpose and scope**

- 1.1. The purpose of this Policy is to set out the core principles of the Group Companies for gender equality and non-discrimination on other grounds, along with guidelines for their implementation, adherence to which provides the conditions for practicing the highest standards of business ethics at the Group Company level.
- 1.2. The Policy applies to all Employees of Group Companies, regardless of the form or remuneration of their relationship with the Group Company in question.

#### **2. Terms and abbreviations used in the Policy**

In the Policy, these terms and/or abbreviations have the following meanings:

<b>The Group or the Group Companies</b>	AKROPOLIS GROUP, UAB and the legal entities it directly or indirectly controls.
<b>Employee</b>	A person who works or holds a position at a Group Company under an employment agreement, regardless of the form or remuneration of their relationship with the Group Company.
<b>The Policy</b>	This AKROPOLIS GROUP, UAB equal opportunities and diversity policy.
<b>Identity Traits</b>	Traits of a person related to gender, race, nationality, citizenship, language, ancestry, social status, age, sexual orientation, disability, ethnicity, membership in a political party or association, beliefs or views, health condition, religion, marital or family status, intention to have a child (children) or other things not related to an Employee's job characteristics.
<b>Discrimination</b>	The restriction or deprivation of rights on the basis of Identity Traits.
<b>Harassment</b>	Unwanted offensive behaviour toward a person, possibly sexual in nature, expressed verbally, in writing or by physical action, where the intention or effect of such behaviour is to violate the person's dignity, particularly by creating an intimidating, hostile, humiliating or offensive environment.

#### **3. Diversity and equal opportunities commitments**

- 3.1. The Group Companies recognize that diversity and equal opportunities are the foundation of an open, forward-looking and thriving society. They therefore aspire to create the kind of work environment where each person's dignity is fostered and safeguarded, people are respected regardless of individuals' Identity Traits, and Employees' work is assessed according to the results and the values demonstrated. The Group Companies apply a policy of zero tolerance for humiliation, harassment, discrimination and other forms of maltreatment.
- 3.2. In their operations, Group Companies practice the principles of gender equality and non-discrimination on other grounds, which enshrine the equality of persons and prohibit restricting human rights or giving privileges based on a person's Identity Traits. Direct or indirect discrimination, humiliation, harassment, sexual harassment and instruction to

discriminate are forbidden at Group Companies under any type of labour relations with Employees.

- 3.3. Members of management bodies of Group Companies and heads of structural divisions shall demonstrate by their own behaviour the standard of behaviour envisaged in the Policy and shall ensure that activities in the areas for which they are responsible are conducted in keeping with the provisions of the Policy.
- 3.4. The Group Companies practice equal opportunities regardless of an Employee's Identity Traits, therefore:
  - 3.4.1. In hiring they apply uniform selection criteria and conditions;
  - 3.4.2. They offer uniform working conditions and opportunities to raise qualifications, pursue professional training, requalify and gain practical work experience, and they also offer uniform benefits;
  - 3.4.3. They use uniform criteria to assess work performance;
  - 3.4.4. They use uniform criteria for dismissal;
  - 3.4.5. They pay the same wage for work that is the same or of equivalent value;
  - 3.4.6. They take measures to ensure that Employees do not experience harassment in the workplace and are not instructed to discriminate;
  - 3.4.7. They take measures to ensure that Employees do not experience sexual harassment;
  - 3.4.8. They take measures to ensure that no Employee who submits a complaint about discrimination or is involved in a court case on discrimination, nor any representative of theirs or person testifying or providing explanations regarding discrimination, is persecuted and that they are protected from hostile behaviour and negative consequences;
  - 3.4.9. They take suitable measures to create conditions in which persons with a disability can get a job, work, pursue a career or learn, including proper adaptation of premises, provided such measures do not impose a disproportionate burden on the company.
- 3.5. The principle of diversity shall be respected in job announcements as well as in organising the selection of new employees and candidates for positions as heads of Group Companies or as members of management or supervisory bodies or committees. During such selection processes, no requirements shall be stated that give any candidate priority on the basis of specific Identity Traits, nor shall information be requested about candidates' private life or family plans.
- 3.6. Exceptions from the application of uniform criteria and conditions are permitted in cases where it is adequate for the legal purpose reached as a result, as well as in cases when the legislation directly provides for it.

#### **4. Policy implementation, oversight, and control**

- 4.1. The managers of Group Companies are responsible for ensuring that the Policy is duly approved and that the Employees of their company are given the opportunity to get acquainted with it.
- 4.2. To ensure effective and timely implementation of the Policy, the Group Companies periodically share information among Employees or organise consultations for Employees, seeking to raise Employees' awareness and knowledge about equal opportunities and diversity, and to share news and encourage good practices.
- 4.3. Support is provided at Group Companies to Employees who report possible cases of discrimination, harassment, sexual harassment or other forms of maltreatment, and other violations of the Policy. Group Companies ensure such persons' confidentiality and personal identity protection as envisaged in the relevant legal acts.
- 4.4. Each Group Company ensures that all possible violations of the Policy are duly investigated by authorised and competent persons. The results, conclusions and recommendations of an

investigation are presented to the members of the management bodies of the Group Company in question.

- 4.5. Violation of the provisions of the Policy is considered a gross violation of labour discipline for which disciplinary action may be taken.
- 4.6. An Employee of a Group Company whose rights are violated has the right, in the manner established by the law, to claim compensation for pecuniary and non-pecuniary damages suffered.
- 4.7. Group Companies which in any manner receive information about a violation of gender equality or non-discrimination on other grounds, shall without delay, within a prudent time after learning about the violation, take actions to eliminate such violations and prevent their further occurrence.
- 4.8. Persons who think that their equal opportunities are being violated have the right to submit a written report to the Head of HR of AKROPOLIS GROUP, UAB for the investigation of their situation. The report may also be made via the Group trust line: [pasitikejimolinija@akropolis.lt](mailto:pasitikejimolinija@akropolis.lt). The Group Company is obliged to investigate such requests without delay, within a prudent time of receiving the request, and to provide a reasoned response. We encourage you to make the report by filling in the report form in Annex 1.
- 4.9. Policy on the Prevention of violence and harassment of AKROPOLIS GROUP, UAB regulates the prevention of violence and harassment in more detail, explains the definitions and means of violence and harassment.
- 4.10. The head of HR of AKROPOLIS GROUP, UAB is responsible for the implementation and updating of this Policy.
- 4.11. If you decide to contact the Group in the cases specified in this Policy, we will process your personal data for the purpose of examining the submitted report. You provide your data on the basis of consent, which is expressed by your active actions, i.e. contacting the Group.

## VIOLATION REPORT FORM

*We guarantee confidentiality.*

REPORT ABOUT VIOLATION	
<b>Data of the reporting person</b>	
Name, surname	
Position	
<b>Contact details of the reporting person</b>	
Phone number	
E-mail address	
<b>Data of the suspect</b>	
Name, surname	
Position	
Relationship with the reporting person (colleague, direct manager, company manager, etc.)	
<b>Description of the event (date, time, place and circumstances)</b>	
Factual circumstances	Consequences
<b>Evidence (e.g., emails from the suspect, text messages, etc.)</b>	
<b>Witnesses</b>	
Name, surname, contact details	
<b>Proposals of the reporting person</b>	
A proposal for a solution to the conflict/current situation	

Date: \_\_\_\_\_

Signature: \_\_\_\_\_