

CORRUPTION PREVENTION POLICY

Company's name:	AKROPOLIS GROUP, UAB
Approval date:	8 January, 2025
Approved by:	CEO's order No. AG-VI-1
Version:	2.

DOCUMENT CHANGE HISTORY

Version	Date	Brief description of the changes
1.	20 March, 2023	First version of the document
2.	8 January, 2025	The document has been supplemented with paragraphs 4.5 and 4.6

1. Objective

1.1. The purpose of this Policy is to set out the main Corruption prevention principles and requirements of the Group Companies along with guidelines for their implementation, thereby creating the context and conditions for compliance with the highest standards of business transparency throughout the Group Companies.

2. Document users

2.1. The Policy applies to all Employees of the Group Companies, including members of management and supervisory boards and committees as well as persons hired under civil law contracts and on other grounds, regardless of the form or remuneration of their relationship with the Group Company in question.

3. Terms and definitions

3.1. **Group Companies** – AKROPOLIS GROUP, UAB and all legal entities it directly or indirectly controls.

3.2. **Employee** - a person hired under an employment agreement or civil law contract or who on some other basis works or holds a position at a Group Company, including members of management or supervisory boards or committees, regardless of the form or remuneration of their relationship with the company in question.

3.3. **Gift** – an item, service or other benefit of any value that is received or provided free of charge (such as money, drinks, tickets, invitations, discounts, trips, services, accommodation, hospitality, etc.).

3.4. **Conflict of Interest** - a situation where an Employee, in performing his / her duties, makes or contributes to making a decision or carries out an order connected to private interests of his / her own or of a person close to him / her.

3.5. **Corruption** - any action involving the abuse of power entrusted by the Group Companies seeking some advantage for oneself or third parties.

3.6. **Policy** – this Corruption prevention policy.

3.7. **Foreign State** - any foreign country except the country where a Group Company operates, including all of a foreign country's institutions from the municipal to the national level. The notion of Foreign State also includes international organisations.

3.8. **Foreign Public Official** - any person holding a position in Foreign Public authorities which have legislative power or perform functions of public administration, including but not limited to judicial authorities, independently of whether the person is elected or appointed to the position. Additionally, a person who holds a position in a public legal entity or an international organisation is also considered to be a Foreign Public Official.

4. Anti-corruption commitments

4.1. The Group Companies do not tolerate Corruption in any form and take preventive measures to prevent manifestations of Corruption in the Group Companies.

4.2. Compliance with provisions of the law and norms of behaviour:

4.2.1. In their activities, the Group Companies and their Employees comply with all requirements of the law and other legal acts applicable to the Group Companies, including anti-corruption legislation.

4.2.2. In situations where this Policy, the law, and other legal acts do not specify the relevant norms of behaviour, the Group Companies and their Employees behave in such a way as to comply with what society accepts as the highest standards of reliability, honesty and transparency.

4.3. Disclosure of information and transparent accounting:

4.3.1. The Group Companies ensure that their activities and goals are transparent and clearly declared.

4.3.2. Group Companies' accounting must be accurate and correctly reflect all transactions and events, strictly complying with all applicable legislation and local business accounting standards / international financial reporting standards.

4.3.3. Management and oversight of Group Companies' documents must be accurate and correct, conducted in strict compliance with applicable legislation. The Group Companies do not tolerate and forbid any actions related to destroying, damaging, distorting or otherwise manipulating original documents.

4.4. Principle of zero tolerance for Corruption:

4.4.1. The Group Companies are committed to operating in accordance with the principle of zero tolerance for Corruption. They apply the principle of zero tolerance for Corruption in relations with both the public and the private sectors.

4.4.2. The Group Companies do not tolerate any form of Corruption or acts of a corrupt nature specified in laws or other legal acts applicable to the Group Companies or in this Policy, including such forms of Corruption as requesting or offering a bribe, trading in influence, facilitation payments, and other acts performed as a way of seeking/demanding or offering a bribe, trading in influence, facilitation payments, or of hiding such crimes with the nature of Corruption.

4.4.3. Group Companies' business partners, suppliers, and other third parties that have relationships with Group Companies also must base their activities on the principles of ethical and responsible business and abide by the anti-corruption provisions of applicable legislation.

4.5. Preventive measures for transparent activities before starting a business relationship with a natural or legal person (the list is not exhaustive, minimum preventive measures are provided):

4.5.1. the person responsible for signing the relevant agreement must ensure that the representative of the other party has the right/is duly authorized to represent the relevant entity;

4.5.2. the person responsible for signing the relevant agreement must check whether there is information in publicly available sources that raises suspicions about possible corrupt actions committed by the other party or persons related to it (i.e. cases where the other party or persons related to it, by illegally abusing their power (resources) seek benefits for themselves or related third parties, including, but not limited to, bribery);

4.5.3. in relation to rental relationships - ensure that the other party has an account with an entity registered in the Republic of Lithuania that has the status of a bank; if this criterion is not met, each situation is assessed individually;

4.5.4. comply with other requirements provided for in the procedures of the Group companies (for example, in the Sanctions Compliance Policy).

4.6. In the event that the circumstances specified in subparagraphs 4.5.1 – 4.5.4 above become apparent after the commencement of the business relationship, the person maintaining the relevant business relationship must immediately inform his/her direct manager and the Head of Legal of AKROPOLIS GROUP, UAB; in all cases, the situation is assessed individually, taking into account the information collected.

5. Sponsorship and donations

5.1. The Group Companies refrain from any form of influence, direct or indirect, and from financing or in any other way providing support for politicians, political parties or movements,

their representatives or their candidates, election campaigns, and foundations and other organisations established by politicians or persons associated with them.

- 5.2. Each Group Company is responsible for granting sponsorship and donations in keeping with the legislation in force and internal policies.

6. Gifts and other benefits

- 6.1. The Group Companies only accept and offer business Gifts that are within the normal standards of business relations and transparency. Group Companies do not tolerate any Gifts, payments or hospitality which encourage or reward a decision or which seek to obtain favour or special status in any matters related to Group Companies.
- 6.2. Employees are required not to directly or indirectly demand from third parties any Gift related to their responsibilities in a Group Company. Gifts and business hospitality may only be offered or accepted if done in complying with the law, this Policy and the internal rules of the Group Company concerned.
- 6.3. Group Companies only accept invitations to events, meals and entertainment if there are important business reasons for the Company to participate in such events and such hospitality is normal and usually acceptable, not of excessive value, and provided and received with no explicit or implicit commitment of any kind by the recipient of the hospitality to the provider. Travel, accommodation and other expenses related to such hospitality are paid by the relevant Group Company.
- 6.4. Each Group Company establishes the rules applicable to its Employees for accepting, receiving and offering Gifts and for behaviour with them.

7. Conflicts of Interest

- 7.1. Group Companies' business decisions and actions are based on the principle of greatest benefit for the Group Companies. Employees must avoid any kind of Conflict of Interest which could negatively influence the impartial and objective performance of their duties or functions.
- 7.2. Group Companies' work instruments, financial and material resources, and internal and confidential information may be used only for the performance of Employees' direct responsibilities, except in cases where another use is regulated clearly and in writing.
- 7.3. Each Group Company establishes the procedures applicable to its Employees for declaring Conflicts of Interest as well as measures for avoiding and for managing Conflicts of Interest.

8. Purchasing

- 8.1. The Group Companies ensure that all their purchases are conducted transparently, in accordance with the requirements of equal treatment, non-discrimination, mutual recognition, proportionality and objectivity.

9. Nepotism and cronyism

- 9.1. Favouring of family members or relatives (nepotism) or of friends or any other associates (cronism) is not tolerated within the Group Companies, nor are relationships of direct subordination or control among such persons tolerated. Employees are selected without discrimination, transparently, conscientiously, based on their competencies and in accordance with the law.

10. Foreign Public Officials

- 10.1. Employees who interact with Foreign Public Officials or operate in Foreign States must abide by principles of zero tolerance for Corruption and the provisions set out in the Policy, regardless of whether or not acts of a corrupt nature are punishable in the Foreign State.

11. Policy implementation, oversight, and control

- 11.1. The members of the Group Companies' management bodies and heads of structural divisions demonstrate by their own behaviour the standard of behaviour envisaged in this Policy and ensure that activities in the areas entrusted to their responsibility are conducted in keeping with the provisions of this Policy.
- 11.2. The legal function of AKROPOLIS GROUP, UAB is responsible for the supervision and control of the Group's Corruption prevention issues.
- 11.3. To ensure effective and timely implementation of this Policy, Group Companies periodically organise consultations for Employees, seeking to raise Employees' anti-corruption awareness and encourage anti-corruption practices. The head of HR of AKROPOLIS GROUP, UAB is responsible for organizing consultations.
- 11.4. Seeking to ensure the performance of the provisions of this Policy, prevent violations, and promote transparency and trust, the Group maintains a trust line that helps to create conditions in the Group Company in question for reporting violations of the Policy and for obtaining information needed for its implementation.
- 11.5. The principle of the trust line: a special e-mail address pastikejimolinija@akropolis.lt has been created, through which interested persons can report violations of the Policy. Only the legal and HR functions of AKROPOLIS GROUP, UAB have access to this mailbox, and they examine the submitted reports. All reports received through the trust line must be treated securely and confidentially. If you have any doubts regarding employees of legal and HR functions, you may submit a report to any function manager of AKROPOLIS GROUP, UAB, confidentiality is guaranteed in any case. We encourage you to submit the report by filling in the form in Annex 1.
- 11.6. The trust line shall be used only in good faith, the Group does not tolerate false reports made with the intention of causing harm. The trust line is also not intended for commercial or other general inquiries. In the event that a report is made in good faith, but it later turns out that a violation has not been committed, it is prohibited to take any retaliatory action against the person who submitted the report.
- 11.7. Support is provided at the Group Companies to Employees who report possible instances of Corruption and other violations of this Policy, such as giving, accepting, promising or offering unlawful recompense, harassment, Conflict of Interest, and so on. Group Companies ensure such persons' confidentiality and personal identity protection as envisaged in the relevant legal acts. Employees should not be in doubt or fear about their position when reporting, non-retaliation is a fundamental principle on which reports are investigated.
- 11.8. 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.
- 11.9. Group Companies seek that all their suppliers, contractors, subcontractors, consultants, intermediaries, support recipients and other business partners abide by the requirements of this Policy. For that reason, the Policy is published on the websites of the Group Companies.
- 11.10. A violation of the provisions of this Policy is considered to be a gross violation of labour discipline for which disciplinary action may be taken. On detecting signs of criminal activity, Group Companies inform the relevant law enforcement authorities.
- 11.11. This Policy applies to AKROPOLIS GROUP, UAB directly and to other Group Companies when approved by the head of the Group Company in question.
- 11.12. 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	
Data of the reporting person	
Name, surname	
Position	
Contact details of the reporting person	
Phone number	
E-mail address	
Data of the suspect	
Name, surname	
Position	
Relationship with the reporting person (colleague, direct manager, company manager, etc.)	
Description of the event (date, time, place and circumstances)	
Factual circumstances	Consequences
Evidence (e.g., emails from the suspect, text messages, etc.)	
Witnesses	
Name, surname, contact details	
Proposals of the reporting person	
A proposal for a solution to the conflict/current situation	

Date: _____

Signature: _____