

UAB „MANTINGA GROUP“ ANTI-CORRUPTION POLICY

I. GENERAL PROVISIONS

1. UAB „MANTINGA GROUP“ (hereinafter - **Group**) Anti-Corruption Policy (hereinafter - **Policy**) establishes and defines the obligations and rights of the Group and its employees with respect to the prevention of corruption and sets out the main guidelines for the implementation of the Policy.
2. This Group Policy contains general provisions, principles and guidelines for implementation and for the prevention of Corruption or the resolution of Conflicts of Interest.
3. The Policy applies to all Group companies directly, with Group companies joining the Policy by order of the CEO. The Policy shall be mandatory for all employees of the Group, individuals who act on behalf of the Group or Group companies, regardless of their relationship with the Group.
4. By approving the Policy, the Group commits to comply with national and international legislation governing the Group's activities in the area of prevention of corruption and to observe the principles of business ethics and transparency.

II. TERMS AND ABBREVIATIONS USED IN THE POLICY

5. **Corruption** - abuse of power to benefit oneself or another person.
6. **A bribe** - can be any illegally obtained benefit.
7. **Conflict of interest** - a situation where an employee, while doing his/her duties, decisions or other actions related to the Group's activities and interests, violates the Group's interests in order to satisfy his/her personal interests.
8. **A gift** - a voluntary transfer of one's own property to another person, without compensation. It is suggested that the concept of a gift should be synonymous with the word "gratuitous".
9. **Group or Group companies** - legal entities directly and indirectly controlled by UAB „MANTINGA GROUP“ for the purposes of this Policy, reference to the Group shall collectively refer to each legal entity belonging to the Group.
10. **Management Board** - the Management Board of UAB „MANTINGA GROUP“

III. ENGAGING IN CREATING A TRANSPARENT BUSINESS

11. **The Group's** activities are guided by legitimate business principles:
 - 11.1. The Group's activities must not conflict with the group's national and international laws of the country.
12. The personal example set by management is a key factor in building and implementing the Group's intolerance to Corruption:

12.1. the Board approves the Policy and ensures that the Group's strategy is aligned with the principles set out in the Policy;

12.2. members of the management organs of Group companies and heads of structural units of Group companies shall, by their behavior, shape the standard of conduct set out in the Policy and ensure that activities in the areas of their responsibility are carried out in accordance with the provisions of this Policy;

12.3. the day-to-day implementation of this Policy, including regular information and training on anti-corruption issues, and the monitoring of compliance with this Policy, is part of each manager's responsibility.

13. Involving staff in the implementation of the principles of the Policy:

13.1. staff is informed about the Policy and are involved in the implementation of individual anti-corruption control measures;

13.2. Group employees are responsible for adhering to the principles set out in the Policy and are encouraged to speak up about the problems and be interested in examples of good practice.

IV. APPLIED TRANSPARENT BUSINESS PRINCIPLES

14. The Group does not tolerate any form of **Corruption**, that directly or indirectly seeks any form of personal gain for oneself or for others, whether by accepting, giving, offering or demanding benefits (favours, money, privileges, promises, brokerage, or any other form of benefit).

15. The Group does not tolerate any form of **bribery** - accepting a Bribe, promising or agreeing to accept a Bribe, demanding a Bribe, soliciting a Bribe, receiving a Bribe. Obtaining, offering, giving or promising any financial or other benefit for oneself in order to influence or take advantage of various decisions will be considered an abuse of position.

16. Bribery can be any material or other non-material benefit, such as: beneficial Gifts, money, payment for entertainment or travel, leakage of valuable and important information, abuse of position, etc.

17. Group employees, suppliers of raw materials or services are prohibited from directly or indirectly offering, giving, accepting, soliciting or accepting a Bribe, and the same is prohibited through third parties.

18. The Group does not tolerate **Conflicts of Interest**. Employees of the Group agree to perform their duties impartially, honestly and properly, to abstain from making decisions, that may cause Conflict of Interest and to immediately report (in writing, by e-mail) the Conflict of Interest and their abstention to their line manager.

19. The Group does not tolerate - and does not offer or accept - **Gifts**, corporate hospitality and entertainment, that are designed to encourage decisions, that benefit either party and that may cause conflict of interest:

19.1. only commercial business Gifts and such business hospitality where it is not intended to favor the Group's or third parties' decision-making, and where they are provided freely and transparently, are acceptable to the Group;

19.2. the Gift giver or recipient must immediately inform his/her line manager of the Gift received;

19.3. employees of the Group are prohibited from directly or indirectly seeking or requesting Gifts from employees of the Group or interested third party entities.

20. The Group commits to grant support only on the basis of the legislation governing the granting of support and in compliance with the Group's priorities for the granting of support, in accordance with the terms and conditions set out in the Group's operational documents:

20.1. the Group supports social, educational, artistic, cultural, scientific, sporting activities and projects. The Group ensures, that its support reaches those target groups whose activities and initiatives are in line with the Group's values, strategy and/or highlight and promote initiatives of general interest.

21. The Group's **accounting** is carried out in strict compliance with all applicable laws, regulations and International Financial Reporting Standards in pursuit of the objective of presenting fairly all of the Group's transactions and events.

V. POLICY IMPLEMENTATION, MONITORING AND CONTROL

22. The Group is implementing preventive measures to avoid Corruption in the Group (expanding the possibilities for employees to report anonymously and non-anonymously possible violations of a Corrupt nature through surveys, complaint boxes, e-mail).

23. A Group employee who suspects, that a violation of the Policy is about to be committed, has been committed or is being committed, must immediately inform his/her line manager and/or the Group person responsible for the implementation of the Policy and/or apply the Group's "Procedure for the Submission and Handling of Reports of Violations of the Policy".

24. Employees' ethical behavior and anti-corruption awareness is developed through training and/or information and/or surveys to assess the level of tolerance of employees towards corruption etc.

25. The Group has developed and approved the Policy to ensure, that the Group's employees comply with the principles and standards set out in the Policy. Violation of the principles and standards set out in the Policy may lead to the application of legal liability, including dismissal.

VI. WHISTLEBLOWER PROTECTION

26. Reports of violations of the Policy shall be dealt with, in accordance with the provisions of the "Procedure for the Submission and Handling of Reports of Violations of the Policy" approved by the Group or by the Group companies.

27. The Group commits to protect the confidentiality of whistleblowers and to take all necessary measures to ensure, that a person who reports a suspected violation of the Group's Policy does not suffer any adverse consequences in connection with his/her report.

28. The whistleblower protection provisions also apply if it turns out that the information provided by the person has not been verified.

29. The Group provides all whistleblowers with a full guarantee of confidentiality, data protection, non-disclosure and non-reprisal.

VII. FINAL PROVISIONS

30. The Policy will be approved and changed by a decision of the Management Board.

31. The Policy will be reviewed at least every three years. A review may be initiated earlier by the Board and/or the CEO and/or by a decision of the Group or Group company responsible for the implementation of the Policy if it is determined, that there is a change in factors that may affect the Policy.

32. The Group seeks to ensure, that all its suppliers, contractors, subcontractors, consultants, intermediaries, beneficiaries, agents and other business partners comply with the principles set out in the Policy, and therefore the Policy is publicly available and freely accessible to all interested parties, and is published on the Group's website www.mantinga.lt