

**GROUP OF COMPANIES OF UAB “MANTINGA GROUP”
EQUAL OPPORTUNITIES POLICY AND ITS IMPLEMENTATION**

1. GENERAL PROVISIONS

1.1. The objective of the Equal Opportunities Policy (hereinafter - the **Policy**) of UAB “MANTINGA GROUP” Group of Companies (hereinafter - the **Group**) and the procedure for its implementation is to set out and consolidate the basic principles of equal opportunities applied within the Group, compliance with which enables not only to meet but also to implement the highest standards of business ethics at the Group level.

1.2. Scope of Application and Tasks

1.2.1 Ensure that all employees of the Group, whether current or candidates have equal working conditions both before and after employment, regardless of their gender, race, nationality, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnic origin, religion, membership in a political party or association, intention to have a child (children), state of health, circumstances not related to the professional qualities of employees, on other grounds provided for by law.

1.2.2. Ensure an inclusive and diversity-friendly working environment in which an employee or a group of employees is not exposed to hostility, unethical, humiliating, insulting and intimidating behaviour that violates the dignity, physical or psychological integrity of an individual employee or a group of employees.

1.2.3. The Policy shall be an internal procedure document of the Group binding on all employees. This Policy shall be communicated to all employees of the Group in the manner specified in the internal rules of procedure. In performing their duties, employees must observe the obligations and principles outlined in the Policy.

1.3. Basic Requirements for the Group Employees

1.3.1. Follow the requirements set out in this Policy and thus contribute to ensuring equal opportunities and diversity and avoid possible cases of discrimination.

1.3.2. Strictly avoid discrimination, harassment, bullying, do not humiliate other employees on the grounds of their sex, race, nationality, language, origin, social status, faiths, beliefs or views, age, sexual orientation, disability, ethnicity or religion, and employees who have experienced possible manifestations of discrimination shall not persecute them or take other measures of influence against such employees who raise unfounded suspicions.

1.3.3. Respect the dignity of another person, communicate with each other politely and respectfully, and ensure a friendly and non-discriminatory working environment in which the other person is not subjected to hostile, unethical, humiliating, aggressive, abusive or offensive actions.

1.3.4. Do not harass or tolerate other people’s inappropriate behaviour, both towards themselves and towards others (e.g. clients, apprentices, etc.), resulting in violence, and unethical and disrespectful treatment.

1.3.5. Immediately inform the authorised person of the Group responsible for the implementation of the Policy about the observed violations of equal opportunities and diversity.

2. CONCEPTS USED IN THE POLICY

Concept, abbreviation	Definition
Discrimination	Direct and indirect discrimination, harassment, instruction to discriminate based on sex, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity, religion
Equal opportunities	Implementation of human rights enshrined in international human and civil rights documents and laws of the Republic of Lithuania regardless of gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity, religion
Violation of equal opportunities	Failure to perform or improper performance of the duties outlined in this Policy and non-compliance with prohibitions
Indirect discrimination	An act or omission, a rule of law or an assessment criterion, an apparently neutral condition or practice that is formally the same but the implementation or application of which results or is likely to result in an actual limitation of the exercise of rights or the granting of privileges, preferences or advantages on grounds of sex, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity or religion, unless that act or omission, rule of law or assessment criterion, condition or practice is justified by a legitimate aim and the means of achieving that aim are appropriate and necessary
Harassment	Undesirable conduct when, based on sex, race, nationality, citizenship, language, descent, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity or religion, the intention is to insult or the dignity of a person is offended and the intention is to create, or an intimidating, hostile, degrading, humiliating or offensive environment is created
Sexual harassment	Undesirable conduct of a sexual, offensive, verbal nature expressed in writing or through a physical act towards a person, resulting from an aim or effect that undermines the dignity of the person, in particular by creating an intimidating, hostile, insulting, humiliating or offensive environment
Social status	A person's status, which is determined by his/her family situation, education, qualification or training acquired and studies at higher education and research institutions, property owned, income received, need for state support provided for in legal acts and/or other factors related to the person's property situation
Direct discrimination	Treatment of a person where less favourable conditions are applied or created based on sex, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity or religion than are, have been or would be applied to another person under similar circumstances, except for the cases provided for by the laws

3. FUNDAMENTAL PRINCIPLES OF EQUAL OPPORTUNITIES AND DIVERSITY POLICY

3.1. The Group shall not tolerate any form of discrimination and any form of violence and harassment (bullying, disrespect, coercion, intimidation, manipulation, physical violence, humiliation, etc.) and any other actions that create an unsafe, hostile working environment, violate the psychological environment, human dignity or endanger human health in respect of employees of the Group's companies and third parties.

3.2. The principles, culture and values of the Group's activities, as well as the procedures, policies and other decisions regulating the Group's activities, must meet objective and uniform criteria in the following areas of activity related to employment relations:

3.2.1. Attracting, selecting, recruiting and dismissing candidates:

3.2.1.1. job-search advertisements shall specify requirements relating to the competences required for the performance of the job function. Adverts of vacancies shall be drafted in such a way that they do not create an opportunity to apply for a position only to candidates of a certain gender, race, nationality, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity or religion (except for the cases provided for by the laws);

3.2.1.2. during the job interview, all questions asked to the candidate shall relate only to the assessment of his/her suitability to perform a particular job function;

3.2.1.3. vacancies in the Group shall be published on specialised job search portals and the Group's website. Available vacancies shall be published on the Intranet of the Group, and the information shall be updated weekly or less frequently if there are no changes;

3.2.1.4. when concluding an employment contract with a candidate, the employee responsible for personnel management (hereinafter - the responsible employee) shall inform the candidate of the information that he/she should provide on his/her family situation to ensure the application of the guarantees provided for in legal acts. The candidate may refuse to provide such information. In such a case, the responsible employee shall inform the candidate that, if the specified information or documents are not submitted, the Group will not be able to ensure the application of the guarantees provided for in legal acts to the employee;

3.2.1.5. The criteria for dismissal of employees applied in the Group shall be related only to the competence of the employee, his/her values, violation of labour discipline and/or other circumstances provided for in the Labour Code of the Republic of Lithuania. When adopting a decision on the dismissal of an employee, the principles of dismissal shall be applied equally to all employees, taking into account objective criteria.

3.2.1.6. in the event of circumstances requiring the dismissal of a group of employees at the initiative of the employer through no fault of their own (Article 57(3) of the Labour Code), the Group shall undertake to set up a selection committee and draw up and coordinate the criteria for the selection of workers to be dismissed with the Labour Council;

3.2.2. Working conditions, remuneration and promotion, training and career development of employees:

3.2.2.1. The Group shall undertake to provide all employees with working conditions based on uniform principles (considering the employee's competence, and performance outcomes), as well as opportunities to develop, pursue a sustainable career or retrain, gain work experience and promote;

3.2.2.2. the basic rates of remuneration for specific position groups (Fixed Remuneration Part – FRP) shall be set in the remuneration systems of the Group administration and, separately, production personnel;

- 3.2.2.3. bonuses, premiums and other employee incentive payments shall be applied based on clear criteria described in the remuneration systems. If the procedure for payment of certain benefits or motivational measures has not been discussed or approved in the Group, when allocating such payments or motivational measures, the Group shall be guided by the general principles of equal opportunities, fairness and reasonableness;
- 3.2.2.4. the career opportunities of an employee in the Group shall depend on the employee's competence, achieved performance outcomes and the Group's ability to provide the employee with a higher position;
- 3.2.2.5. the assessments of employees in the Group shall be carried out following the rules approved by the Director of the Group for administration and separately for production employees, considering the competence and performance outcomes of the employees.

3.3. The Group, taking into account the specifics of the activities, shall take measures to enable persons with disabilities to apply for vacant positions in the Group, as well as ensure the implementation of uniform conditions set out in clause 3.2 of the Policy, provided that such measures do not impose a disproportionate burden on the employer's obligations.

3.4. The Group shall help employees to balance work and family responsibilities. Employees with family responsibilities or patronising/caring for a close person shall be allowed to choose a flexible working time regime, in coordination with their immediate supervisor.

3.5. The following cases of so-called 'positive discrimination' shall not be considered discrimination within the Group:

- 3.5.1. special protection of women during pregnancy and childbirth and breastfeeding of the child;
- 3.5.2. women are subject to requirements concerning the safety of persons at work which aim to preserve their health, taking into account their physiological characteristics;
- 3.5.3. age limits provided for by law, where this is justified by a legitimate aim and the means of achieving that aim is appropriate and necessary;
- 3.5.4. the requirement laid down by law to know the official language;
- 3.5.5. in the cases established by the laws, different rights are applied regarding the citizenship;
- 3.5.6. special interim measures laid down by the laws are applied to ensure equality and prevent violations of equal opportunities on grounds of age, sexual orientation, disability, racial or ethnicity, religion or beliefs;
- 3.5.7. Other cases provided for in Lithuanian legislation.

3.6. Every employee shall have the right to freedom of peaceful gatherings and to freedom to join with others in associations at all levels, particularly, in the political, professional and civic spheres, including the right to form and join trade unions to defend his/her interests.

3.7. The Group shall provide an opportunity and create favourable conditions for employees and other interested persons to react and report violations of the principles of equal opportunities promptly and undertake to examine them following the established procedure.

3.8. The Group shall ensure that an employee or other interested person who has reported a potential violation of Equal Opportunities and Diversity is protected against hostile treatment or adverse consequences and shall ensure confidentiality. These circumstances may not constitute grounds for termination of the employment relationship with such an employee.

4. PROCEDURES FOR REPORTING AND EXAMINING POTENTIAL VIOLATIONS OF EQUAL OPPORTUNITIES

4.1. An employee of the Group who suspects that violations of this Policy are planned to be committed, have been committed or are being committed must immediately inform his/her immediate supervisor and/or the person of the Group responsible for the implementation of the Policy and/or through the application of the provisions of the procedure for reporting violations and their examination approved by the Group. An employee or other interested person must report a possible violation of the principles of equal opportunities as soon as possible.

4.3. Reports shall be examined following the provisions of the Procedure for reporting violations and their examination approved by the Group or the companies of the Group. Reports shall be examined by the principle of goodwill, following the principle of promptness, ensuring the objectivity and impartiality of the procedure and the decision-makers, allowing the parties to the complaint to express their version of the assessment and interpretation of actions and events.

4.4. The Group shall undertake to protect the confidentiality of whistle-blowers and take all possible measures so that a person who has reported a reasonably suspected violation of the Group's Policy does not suffer negative consequences related to his/her report.

4.5. The Group shall provide all reporting persons with a guarantee of complete confidentiality, data protection, non-disclosure and non-application of retaliation.

4.6. An employee or a candidate for a vacancy may lodge a complaint with the [Office of the Equal Opportunities Ombudsperson](#) or another competent authority regarding a violation of equal opportunities. The Group shall undertake to cooperate with the investigating authority.

4.7. After examination of the report, the same report submitted repeatedly shall not be examined, except for the cases where new circumstances are indicated or new facts that emerged and/or were determined after the investigation of the violation are presented.

4.8. The Group has developed and adopted the Policy to oblige the Group's employees to properly follow the principles and norms enshrined therein. In case of violation of the principles and requirements established in the Policy, which is considered a serious violation of work duties, employees may be subject to the liability provided for in the Labour Code of the Republic of Lithuania.

4.9. Representatives of the Labour Council may participate in the investigation of reports related to the violation of the principles of equal opportunities.

5. FINAL PROVISIONS

5.1. When approving the Policy, the employer shall, by order, appoint an employee who is responsible for familiarising employees with this Policy, as well as for monitoring the implementation of this Policy.

5.2. To ensure effective and timely implementation of the Policy, the Group periodically informs employees or organises training and consultations on equal opportunities and diversity seeking to

raise consciousness and awareness of equal opportunities and diversity among employees, share current affairs and ensure good practices.

5.3. The Group will regularly monitor the state of implementation of the principles of equal opportunities within the Group. The head of the Department of People and Culture or an employee designated by him shall be responsible for regular monitoring of observance of the principles of equal opportunities.

5.4. Before taking decisions on the approval of the Policy or its update, or amendment, the Policy and/or its amendments shall be coordinated with the representatives of the employees.

5.6. This Policy must be brought to the attention of all employees of the Group.

5.7. The Policy is translated into Russian and English, taking into account that the Group also employs citizens who arrived from other countries.

5.8. The Policy is publicly available on the Group's website www.mantinga.lt and is freely available to all interested parties.