

UAB „MANTINGA GROUP“ CODE OF CONDUCT

I. GENERAL PROVISIONS

1. UAB „MANTINGA GROUP“ (hereinafter - **the Group**) operates on the basis of the highest ethical, food safety, employee welfare and quality standards, strictly adheres to national and international legislation, and strives to implement sustainability principles.

2. This Code of Conduct (hereinafter - **the Code**) is adopted with the aim of building and strengthening transparent, ethical and sustainable relationships with any party throughout the Group's chain of business.

3. The Code applies directly to all Group companies, with Group companies joining the Code by order of the head of the company. The Code will be mandatory for all employees of the Group and for people acting on behalf of the Group or an individual Group company, irrespective of their relationship with the Group. A Supplier Code of Conduct has been established based on this Code, which obliges and aims to ensure, that the principles of the Group's Code of Conduct are also observed throughout the supply chain.

II. THE GROUP'S MAIN VALUES

4. The Group operates on the basis of three core values - creativity, flexibility and responsibility. These values are an integral part of this Code. The principles of ethical behaviour and other priorities of the Group as set out and explained in the Code are based on these values.

5. **Creativity** in the Group is understood as:

5.1. generating and presenting ideas that improve the Group's processes and relationships within the team;

5.2. the ability to express an opinion, even if it does not coincide with the opinion of others;

5.3. listening to and not underestimating unconventional, different ideas;

5.4. not being afraid to take unconventional decisions if they benefit the Group.

6. **Flexibility** in the Group is understood as:

6.1. adapting to different clients, colleagues and partners without compromising the Group's values;

6.2. developing a tolerant attitude;

6.3. flexible use of all available resources and opportunities;

6.4. adaptability to changing circumstances;

6.5. seeking solutions that are acceptable to all parties.

7. **Responsibility** in the group is understood as:

7.1. solving problems promptly, finding ways to prevent them from happening again (not looking for "the guilty");

- 7.2. a sense of responsibility for decisions and/or actions taken;
- 7.3. sharing information in a targeted way (at the right time and with the right people);
- 7.4. contributing to a good microclimate and respectful communication with colleagues;
- 7.5. keeping one's word and respecting agreed terms;
- 7.6. taking care of the environment, the working environment and the people around them, even if this is not a direct duty.

III. RESPECT AND EQUAL RIGHTS

8. The Group adheres to and respects internationally recognized human rights priorities and standards, and therefore the Group's activities:

8.1. creating a workplace based on respect and equal human rights, where workers have equal and fair access to proper working conditions or opportunities for development;

8.2. no discrimination of any kind, including but not limited to - discrimination on the grounds of ethnic origin, gender, sexual orientation, marital or social status, parental or maternity status, religion, political opinion, nationality, disability, age, or membership of a trade union or organisation;

8.3. any form of violence or harassment, such as bullying, disrespect, coercion, intimidation, manipulation, physical violence, and any other action, that creates an unsafe, hostile work environment, violates the psychosocial environment, violates the dignity of a person, or jeopardises a person's health is prohibited;

8.4. The Group complies with the Group's "Policy on Prevention of Psychological Violence/Mobbing and Harassment in the Work Environment".

IV. SOCIAL CONDITIONS

9. The Group complies with internationally recognised human rights and other applicable laws.

10. Employees' wages, holiday pay, overtime or incentive bonuses will be calculated fairly and paid in a timely manner, in accordance with all requirements for wages under national legislation.

11. The salary must not be less than the minimum wage set by national law.

12. Deduction from wages as a disciplinary measure that is not based on legal requirements is not applicable and is not tolerated.

13. Average working hours, including overtime and/or arrangements for additional work, must not exceed the requirements set out in national legislation.

14. Overtime is only available on a voluntary basis, without coercion or manipulation.

15. Every employee has the right to rest:

15.1. The Group encourages employees to take at least the minimum number of vacation days per year as provided for by national law - two weeks of uninterrupted rest;

15.2. breaks during working hours are planned and granted in accordance with national law. Rest areas will be made available to each staff member in shared rest areas.

16. The group does not tolerate any form of pressure:

16.1. workers choose to work of their own free will, punishments such as pay cuts cannot be manipulated, employers cannot manipulate workers' personal assets or the benefits of their work, or the theft of personal identification documents, etc.

17. The work of the Group's employees is organised in accordance with the "Rules of Procedure".

V. CHILD WORK

18. Children must not be exploited or engaged in any work, that may have a negative impact on their health, psychological well-being, or affect their access to education and development.

19. Children may only be employed in Group companies where it is in accordance with national legislation and Principle 5 of the UN Global Compact.¹

20. The Group tolerates cooperation and volunteering, where good intentions are pursued and it is ensured, that any activity will not have a negative impact on the child's overall well-being, development or education.

VI. BUSINESS ETHIC

21. Business is conducted in a legal and ethical manner, ensuring compliance with national and international laws, rules and regulations.

22. Choose to work with responsible partners and suppliers who comply with current legislation and meet the Group's key Code requirements.

23. Gifts will be accepted and given in a fair and transparent manner:

23.1. accepting or offering gifts of value to customers, potential customers, business partners or other interested parties is prohibited. Only commercial business gifts and business hospitality are acceptable to the Group (whether accepted or offered) where they are not intended to benefit the Group's decision-making or the decision-making of third parties, etc.

24. The Group's employees commit to perform their duties impartially, honestly, properly and to avoid taking decisions that may cause a conflict of interest.

VII. CONFIDENTIALITY AND DOCUMENT SAFETY

25. Confidentiality of information is a key focus for transparency, integrity and successful cooperation in the Group's operations. Confidential information is protected both within the Group and in cooperation with the Group's partners.

26. **Employees of the Group** commit to protecting the Group's confidential information and understand, that any information about the Group, that is not made public is confidential.

¹ UN Global Compact Principle 5 - <https://www.unglobalcompact.org/what-is-gc/mission/principles/principle-5>

27. Employees protect and defend the Group's reputation by not disclosing false information about the Group's activities and by informing the responsible persons if they become aware of the disclosure of false and/or confidential information about the Group's activities which may damage the Group's reputation.

28. The Group's employees comply with other established security norms as specified in confidentiality agreements.

29. A confidentiality agreement must be signed with suppliers of **services/raw materials** or other interested parties when the Group's confidential information is passed on.

30. The Group keeps personal data and information about its employees secure and will use it only when necessary and in accordance with the procedures provided by law. The Group complies with the Group's "Personal Data Protection Policy".

VIII. CORRUPTION PREVENTION

31. The Group strictly does not tolerate any form of corruption, including extortion, bribery, fraud, money laundering, abuse of position to obtain privileges or other benefits, or other forms of corruption.

32. The Group communicates openly and transparently with employees, partners, suppliers, government bodies, the public or other interested parties.

33. The Group commits to comply with the Group's "Anti-Corruption Policy".

34. Under no circumstances shall employees of the Group give or receive any improper advantage for the purpose of obtaining more favourable terms, deals, actions or other.

35. In case of a situation, where acts of corruption are detected or suspected, the Group's employees undertake to inform the responsible persons of such acts, who shall take further action to stop the illegal activities.

36. The Group requires suppliers, partners or other entities to take action to prevent corruption and recommends compliance with the principles set out in the Group's "Anti-Corruption Policy".

IX. LEGAL COMPLIANCE

37. The Group is committed to complying with the requirements of national and European Union legislation, the International Labour Organisation and the United Nations Conventions (hereinafter - **Legal Acts**).

38. All internal Laws and/or processes developed by the Group will comply with the provisions of the Code to the extent, that they do not conflict with the requirements of Legal Acts applicable to the Group. In the event of any conflict between this Code and the Legal Acts listed above, the requirements of the Legal Acts will be applicable.

X. SUSTAINABILITY

39. In the context of global issues and in order to reflect the Group's priorities and values, the Group adheres to the fundamental principles of sustainability, all relevant Legal Acts at national and international level. The Group shall take care of the environment, its employees, the quality and safety of its products, and shall communicate and cooperate with local communities or other interested parties.

40. The Group has approved and integrated a Sustainability Strategy into the overall Group strategy, based on key sustainability principles and considerations, taking into account the most significant areas of global and local (Group operations) importance for positive change.

XI. ENVIRONMENTAL PROTECTION

41. The Group is committed to ensuring, that its environmental activities comply with all Legal Acts at national and international level.

42. The protection of the environment and better solutions for the environment is one of the Group's priorities, and is taken into account in major issues and decisions. Therefore, the Group's manufacturing companies in Lithuania have implemented an environmental management system in accordance with the ISO14001 standard, which ensures that their activities are in line with environmental priorities.

43. Processes are monitored and controlled to protect all key environmental components - air, water, soil, noise pollution, waste, chemical management.

44. Responsible waste management principles are followed, such as sorting, continuously seeking the most affordable and legal ways to manage waste, and always giving priority to recycling wherever possible.

45. The Group is committed to conserving natural resources and using more sustainable electricity or heat, which is why green electricity is a priority for the Group.

46. More sustainable, environmentally friendly alternatives are being considered, non-recyclable packaging materials are gradually being replaced by recyclable ones, and other actions identified in the Group's Sustainability Policy and the Group's Sustainability Strategy are being taken, either by finding new or changing the raw materials used.

XII. JOB SAFETY AND HEALTH

47. Employees are an asset and it is the Group's responsibility to ensure safe and healthy working conditions, both in terms of the physical and psychological environment. The Group's long-term goal and ambition is zero tolerance of accidents.

48. In addition to the preventive measures required by law, the aim is to ensure safe and healthy working conditions and a suitable psychological environment, and to use non-standard risk management tools

such as PDCA (plan-do-check-act), marking of accident sites with special signs, the production of preventive posters, and the publication of incidents.

49. The aim is to improve employee understanding and involvement in processes relating to occupational safety and health.

50. Compliance with all relevant Legal Acts in creating and ensuring all necessary conditions (e.g. personal protective equipment in workplaces, mandatory and additional training, etc.).

51. All employees, even if they are only employed on a temporary basis, are instructed at the time of employment and are made aware of the Group's occupational health and safety rules and principles, which they must follow.

52. Employees of the Group are prohibited from working if they are drunk or under the influence of psychotropic substances.

53. All Group employees are insured against accidents (death, disability and injury) 24/7 worldwide.

54. There is ongoing discussion with staff, partners, customers, suppliers or other entities to share experiences and good practices, in order to motivate each other and strive for continuous improvement in this field.

XIII. FOOD SAFETY AND QUALITY

55. The aim is to ensure, that every product is safe, meets the highest quality standards, complies with all Legal Acts and is authentic, innovative and as sustainable as possible.

56. The Group's production companies in Lithuania have implemented the following quality standards - IFS Food (The International Featured Standard), BRCGS Food Safety (Global Food Safety Standard), which allow to ensure the compliance of products with all food safety and quality requirements and to help monitor and improve food safety management systems.

57. Complaints of all types from different stakeholders are not ignored, and any quality or health risks are addressed promptly, seriously and responsibly.

XIV. SOCIAL RESPONSIBILITY

58. Since its formation, the Group has aimed to have an open and close relationship with the communities and other stakeholders where it runs its business or carries out other activities and projects.

59. The aim is to develop and deliver a product, that not only delivers direct customer benefits, but also reflects the Group's core sustainability principles and values.

60. Contributing to society's social well-being, supporting diverse communities and non-profit organisations. The aim is to involve not only the Group's employees but also their families in social, community and other uniting activities.

61. Particular attention is paid to education and the younger generation, by supporting educational establishments, initiating innovative learning methods, focusing on staff and promoting excellence in learning, and by supporting health, culture, the arts and other areas of social importance.

XV. INVOLVEMENT OF STAKEHOLDERS

62. It is important to the Group, that all interested parties are made aware of this Code, its scope, therefore appropriate communication and engagement methods will be undertaken:

62.1. Employees will be informed of the entry into operation of the Code through the Group's internal policies platform or by signing a written agreement, the Code will also be available on the Group's internal communication channel (Intranet), where it will be available on a permanent basis, and on the Group's website (www.mantinga.lt).

62.2. The Group aims to inform and encourage the involvement of different stakeholders through the Code. The Code is available to any stakeholder and is made publicly available on the Group's website (www.mantinga.lt).

63. The aim is to ensure that all aspects listed in this Code are implemented throughout the supply chain of raw materials and services. The Group undertakes to make all suppliers of raw materials and services aware of the Group's "Supplier Code of Conduct", which has been developed in accordance with this Code, and to seek their involvement and compliance with its requirements.

XVI. ENFORCEMENT OF THE PRINCIPLES OF THE CODE

64. It is the responsibility of every employee of the Group to ensure, that the provisions of the Code are properly complied with in all markets, areas and countries in which the Group operates.

65. The Code will be reviewed and updated regularly at least every 2 years, and in line with changes in legislation, international best practice, including corruption, labour safety, environmental protection, food quality, sustainability, social responsibility.

66. Implementation and monitoring of the Code:

66.1. The Group is putting in place measures to prevent breaches of the Code both inside and outside the Group (expanding opportunities for staff to report anonymously and non-anonymously on possible breaches through surveys, complaint boxes, etc.);

66.2. Promoting ethical behaviour among staff through training and/or information and/or similar initiatives that contribute to the implementation of the Code;

66.3. Taking into account observations made during audits on possible non-compliance with the provisions of the Code, and recommending the involvement (if any) of the persons designated to oversee the Code.

XVII. WHISTLEBLOWER PROTECTION

67. A Group employee who suspects, that a violation of the Code is about to be committed, has been committed or is being committed will immediately inform his/her line manager and/or the Group person responsible for the implementation of the Code and/or apply the provisions of the Group's Whistleblowing and Whistleblowing Procedure.

68. Reports shall be dealt with in accordance with the provisions of the Whistleblowing Procedure adopted by the Group or Group companies.

69. The Group commits to protect the confidentiality of whistleblowers and to take all reasonable steps to ensure, that a person who reports a reasonably suspected breach of the Group Code does not suffer adverse consequences as a result of his or her report.

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

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

XVIII. FINAL PROVISIONS

72. The Code will be approved and amended by a decision of the Board of Directors of UAB „MANTINGA GROUP“

73. The Code is public and available to all interested parties and is published on the Group's website at www.mantinga.lt