

HUACI GRUPĖ, UAB ANTI – CORRUPTION POLICY

1. Purpose

- 1.1. The purpose of this Policy is to set out the Group's main anti – corruption principles and requirements along with guidelines for their implementation, thereby creating the context and conditions for compliance with the highest standards of business transparency throughout the Group.

2. Applicability

- 2.1. The Policy is applicable to all Employees of the Group, including the members of management and supervisory boards and committees of companies belonging to the Group, persons hired under civil law contracts, and retained consultants, intermediaries and other persons acting on behalf of companies that belong to the Group, regardless of the form or remuneration of their relationship with the corresponding company.

3. Terms and abbreviations used in the Policy

These terms and/or abbreviations are used in the Policy with the following meanings:

Representative	means an employee or member of a management or supervisory board or committee of any Group company, or a person hired under a civil law contract, or a consultant, intermediary or any other person who has the right to act on behalf of the Group or its separate companies.
Company	means HUACI GRUPĖ UAB, Iregistered addressSavanorių pr. 247, 02300 Vilnius, Lithuania.
Employee	means a person hired under an employment agreement or civil law contract or who on some other basis works or holds a position at one or more companies of the Group, including members of management or supervisory boards or committees of companies that belong to the Group, and including Representatives, regardless of the form or remuneration of their relationship with the corresponding company.
Gift	means an item, service, discount or other benefit of any value that is received or provided free of charge (such as money, drinks, tickets, services, trips, accommodation, etc.).
Group	means the Company and legal entity directly or indirectly controlled by the Company. In the Policy, a reference to the Group at the same time means a reference to each legal entity that belongs to the Group.
Conflict of Interest	means a situation where an Employee has to choose between performing duties of their position and/or functions entrusted to them, and a private interest of their own or of a third party.
Corruption	means any action involving the abuse of power entrusted by the Group seeking some advantage for oneself or third parties.
Policy	means this anti – corruption policy.
Foreign State	means 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.
Foreign Public Official	means 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. In addition, a person holding a position in a public legal entity or an international organisation is also considered as a foreign public official.

4. Anti – corruption commitments

- 4.1. The Group does not tolerate Corruption in any form and commits to take preventive measures to avert manifestations of Corruption in the Group and to fight against it.
- 4.2. Compliance with provisions of the law and norms of behaviour
 - 4.2.1. In its operations, the Group complies with all requirements of the law and of other legal acts applicable to the Group, 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 behaves 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 ensures that its activities and goals are transparent and clearly declared.
 - 4.3.2. The Group's accounting has to be accurate and correctly reflect all transactions and events, strictly complying with all applicable legislation and accounting standards.
 - 4.3.3. Management and oversight of the Group's documents have to be accurate and correct, conducted in strict compliance with applicable legislation. The Company and the Group 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. In its operations, the Group committed to conduct business in accordance with a principle of zero tolerance for Corruption. It applies the principle of zero tolerance for Corruption in relations with both the public and the private sectors.
 - 4.4.2. The Group oppose corruption in all forms of or acts of a corrupt nature which are specified in the laws and other legal acts applicable to the Group 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. The Group's business partners, suppliers, and other third parties that have relationships with the Group's companies also have to base their activities on the principles of ethical and responsible business and is committed to conduct business in accordance with the provisions of applicable legislation.

5. Sponsorship and donations

- 5.1. The Company and the Group refrain from any form of influence, direct or indirect, and from financing or in any other way providing support for politicians, political parties/movements, their representatives or their candidates, election campaigns, and foundations and other organisations established by politicians or persons associated with them.
- 5.2. The Group provides sponsorship and donations in accordance with the applicable legislation that regulates the granting of sponsorship and donations and the rules for granting sponsorship and donations that are in force within the Group.

6. Gifts and other benefits

- 6.1. Employees may not, directly or indirectly, accept any Gift related to the Group's activities, unless:
 - 6.1.1. the Gift is a business gift with promotional intent (usually marked with the trademark of the company giving the gift) that has little value (not exceeding EUR 30), or
 - 6.1.2. it is obvious that refusal of the Gift might offend the person giving the Gift and the Gift is offered and accepted without an explicit or implied undertaking of a commitment by the recipient of the Gift toward the giver of the Gift. In such a case, the recipient of the

Gift must without delay notify his or her direct manager and the person responsible for anti-corruption, and relinquish the received Gift to the Group, or

- 6.1.3. the Gift is received or presented during an official meeting or visit and corresponds to fair business practices and international protocol and to hospitality demands suited to maintaining a business relationship. In such a case, the presenter or recipient of the Gift must without delay notify his or her direct manager and the person responsible for anti-corruption about the Gift which has been given or received. When a Gift has been received, the recipient of the Gift must relinquish the received Gift to the Group;
- 6.2. It is forbidden for Employees to directly or indirectly demand Gifts and/or hospitality from interested third parties.
- 6.3. Employees may not, directly or indirectly, accept entertainment which may have an influence or could be understood as having an influence on the Employee's business decisions. Hospitality, including meals and entertainment, may be accepted if there are clear business reasons for the Company to participate in such events and such hospitality is normal and usually acceptable, is not of excessive value, and is 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 incurred by Employees in relation to such hospitality have to be paid for by the Group company in which the Employee works.
- 6.4. Invitations to paid events (conferences, seminars and similar) may be accepted only if they are related to Employees' official meetings and visits or if a Group company or its Employees are organisers or participants of the event (for example, they participate as speakers or sponsor the event). Invitations to events may also be accepted if the events are open and free of charge to all participants. In all other cases, participation must be approved by to Employee's direct manager and the person in the Group company who is responsible for anti-corruption.
- 6.5. Regarding offers of benefits (exclusive discounts, paid holidays, job offers, and so on), money, and gifts other than inexpensive business souvenirs, Employees have to without delay notify Employees' direct manager and the person responsible for anti-corruption.
- 6.6. The travel and accommodation costs of an Employee who visits existing or potential suppliers, partners or other third parties shall be paid for by the Group company where the Employee works.
- 6.7. Giving Gifts and other benefits:
 - 6.7.1. The rules related to the receipt of Gifts and other benefits also apply to the giving of gifts and other benefits on behalf of and in the interests of the Group. Employees shall not give gifts on behalf of and in the interests of the Group, except for business gifts with promotional intent (usually marked with the trademark of the Company and/or the Group) that have little value (not exceeding EUR 30);
 - 6.7.2. The business gifts used in the Company and the Group are intended only for strengthening the image of the Company and the Group, and it is forbidden to use them seeking to obtain favour in any other areas;
 - 6.7.3. Within the Company and the Group it is forbidden to give gifts of any form to regional and municipal officials, civil servants, or employees of foreign states, international organisations, or countries in which Group companies operate, or to employees or auditors of state or municipal companies, institutions, or organisations, including state-controlled and municipal-controlled companies, except in cases where that is required by international protocol and giving the Gift will not influence the Company's image or reputation. Any decision about giving Gifts to persons specified in this section must be approved by the person responsible for anti-corruption and receive an approval by the managing director of the respective Group company.
- 6.8. Gifts that are accepted, returned, and presented shall be registered in the manner established in the Company's internal procedures. All received Gifts, except for the inexpensive Gifts envisaged in section 6.1.1 of the Policy, have to be turned over without delay by the Employee to the person responsible for anti-corruption at the Group company where the Employee works, and such Gifts become the property of the Group company where the Employee works.

7. Conflicts of Interest

- 7.1. The Group's business decisions and actions are based on the principle of greatest benefit for the Group. Representatives must avoid any kind of Conflict of Interest, which could negatively influence the impartial and objective performance of their duties or functions.
- 7.2. The Group's 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. An Employee who faces a situation that may give rise to a Conflict of Interest or who notices a possible Conflict of Interest in other employees' activities must inform the person responsible for corruption prevention about that. Employees who find themselves in such a situation must always notify their direct manager and the person responsible for corruption prevention about that.

8. Foreign Public Officials

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.

9. Policy implementation, oversight, and control

- 9.1. The members of the management bodies of the Group's companies and the management of Group company 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.
- 9.2. The heads of the Group's companies and their structural divisions are responsible for ensuring that their subordinates and other persons reporting to them are properly acquainted with this Policy and internal Group company documents related to its implementation, and that the contents of these documents be clearly and understandably explained (for example, by organising periodic trainings and trainings for new employees, etc.). It is a duty of every manager every day to reinforce this Policy, communicate it to employees, and shape suitable behaviour.
- 9.3. A special *ad hoc* or permanent working group may be formed in the Company, or a person appointed, with responsibility for oversight and control of Corruption prevention issues at the Group level.
- 9.4. To ensure the effective and timely implementation of the Policy, the Group periodically organises trainings and consultations for Employees. It is done seeking to raise employees' anti-corruption awareness and encourage anti-corruption practices. The planning and implementation of trainings and the organisation of consultations is the responsibility of a special *ad hoc* working group formed by the Company or the person appointed as responsible for anti-corruption.
- 9.5. Information about the ongoing implementation of the Policy shall be provided in the Group's annual reports and activity reports.
- 9.6. The Group seeks that all of its suppliers, contractors, subcontractors, consultants, intermediaries, support recipients, Representatives, and other business partners abide by the requirements of this Policy, which for that reason is made public.
- 9.7. Support is provided in the Company for 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. The Company undertakes to protect the employee's anonymity and otherwise ensure the safety of their person and information, and to take measures to protect those who report violations of the Policy from any negative consequences. The Company ensures total confidentiality and personal identity protection, as is foreseen in relevant legal acts. Instances of Policy violation are made public via internal means of communication ensuring compliance with the legislation regulating personal data protection.
- 9.8. Employees must report possible violations of the Policy and suspicions to the employee performing prevention functions, or via, e-mail to hello@huaci.de. Other interested parties are encouraged to report possible violations of the Policy using the Help Line contact information provide on www.huaci.de.

- 9.9. The Company ensures that all possible violations of the Policy are properly investigated, and by authorised and competent persons. The results, conclusions and suggestions of an investigation are presented to the members of the Company's management bodies.
- 9.10. 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.
- 9.11. On detecting signs of criminal activity, Group companies inform the relevant law enforcement authorities.

10. Final provisions

- 10.1. The Policy applies to the Company directly and to other Group companies when approved by the corresponding Group company. Considering the specifics of each Group company's activities, for sound reasons a company may also approve supplementary or alternative Corruption Prevention Commitments as well as mechanisms and procedures for compliance with them and for their implementation, oversight and control.
- 10.2. Employees must be acquainted with the Corruption Prevention Policy and commit to abide by its provisions.
- 10.3. The Company seeks to ensure reliable partnership with suppliers, contractors and other business partners. In its relationships with them, the Group abides by the principles of transparency and honest ethical behaviour. All existing and potential partners of the Group may acquaint themselves with the provisions of the Policy. The Policy is published on the Company's website www.huaci.de and on the website of every company that it directly and/or indirectly owns.