



Supplier Code of Conduct

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1. Purpose

The purpose of this supplier code of conduct (hereinafter – the Code of Conduct) is to set out the key requirements of HUACI GRUPÉ UAB and the legal entities it directly and indirectly controls (hereinafter – the Group or the Group Companies) for suppliers, to create the preconditions for implementing the highest standards of business ethics in the supply chain. The Code of Conduct reflects the effort of the Group Companies to strengthen sustainable collaboration with suppliers, promoting practices that are lawful, professional and fair, including respect for human rights, business ethics and environmental protection.

2. Provisions of the Code of Conduct

The Group is a large business entity with an important presence in the Baltic region and Central European markets, thus we recognize that not just we but our suppliers also shall take the responsibility over their actions, which have an impact on economic growth, social welfare and the quality of the environment. In 2019 the Group joined the United Nations Global Compact (hereinafter – the Global Compact)¹, which is based on principles of human rights, labour, environment and anti-corruption that are relevant to this Code of Conduct. The Code of Conduct was prepared in light of the Group's norms of business ethics, relevant legislation, and the values of the Global Compact.

2.1. Business ethics

All the Group Companies conduct their activities fairly, ethically and according to the law. In each country, they operate according to that country's laws. The Group Companies work to maintain good relations with the supervisory institutions of the countries where they operate, and thus expect suppliers:

- i. to behave fairly, always seeking to comply with the highest standards of ethics and all relevant legal requirements in their areas of operation, including but not limited to corporate governance, the work environment, ethics standards and environmental protection;
- ii. to behave ethically and professionally when interacting with the Group Companies and other stakeholders, and to report violations of the Code of Conduct's standards and risks of violations;
- iii. when requested, to provide accurate information about their activities and their labour, health, safety and environmental practices, without falsifying or hiding facts;
- iv. to avoid any type of conflicts of interest and not to participate in behaviour forbidden by the law;
- v. to not tolerate bribes or other type of illegal payments, the offering or acceptance of gifts of any kind, hospitality or other types of illegal benefit, or the direct or indirect giving, promising, agreeing on or acceptance of any kind of valuable compensation or of any other benefit.

2.2. Human rights

The Group Companies abide by the principle that respect is the foundation of personal and business relationships, and thus expect suppliers:

- i. to respect human rights and comply with all relevant legislation and regulations in the countries where they operate;
- ii. to behave fairly, respectfully and justly with their employees.

2.3. Forced and child labour

The Group Companies strongly oppose forced and child labour and thus expect suppliers:

- i. to ban forced labour in their operations, including the work of prisoners, child labour, debt bondage and other forms of compulsory labour;

¹ The Global Compact is the world's largest voluntary social responsibility initiative, active since 1999. At the basis of the Global Compact are 10 principles in the areas of human rights, environment, labour and anti-corruption, and the 17 Sustainable Development Goals underpinning the UN's "2030 Agenda for Sustainable Development". More about the Global Compact: www.unglobalcompact.org, the 10 Principles of the Global Compact: <https://www.unglobalcompact.org/principles>, the 17 Sustainable Development Goals: <https://www.un.org/17sdg>.

- ii. to only hire employees who meet the applicable minimum age requirements;
- iii. to comply with the laws in force regarding the prohibition of forced and child labour.

2.4. Remuneration and working hours

Group Companies duly remunerate for work and achieved results, considering employees' responsibilities and the situation in the labour market, and provide conditions for growth. They thus expect suppliers:

- i. to determine working hours, wages and overtime policy in compliance with all applicable local laws;
- ii. to pay all employees at least the minimum wage as defined in local legislation.

2.5. Working conditions

Group Companies seek to create a safe and healthy work environment, provide equal opportunities for growth, strive for good performance, and constantly contribute to common goals, and thus expect suppliers:

- i. to provide their employees with a safe and healthy work environment;
- ii. to comply with all applicable laws and regulations related to ensuring suitable working conditions;
- iii. to prevent the use of or participation in situations that could give rise to the threat of physical and psychological violence, verbal or psychological harassment and/or sexual abuse and coercion.

2.6. Freedom of association

The Group Companies expect suppliers:

- i. to recognize employees' right to freely join together with others in associations, to establish and join (or refrain from joining) organizations of their choice, and to take part in collective bargaining, and the exercise of this right should not be discriminatory;
- ii. to ensure that employees have the possibility of reporting grievances and other workplace complaints.

2.7. Occupational health and safety

The Group Companies provide and continually improve safe and healthy conditions in the workplace, also ensuring the safety of work processes and implementing preventive measures, and thus expect suppliers:

- i. to comply with all relevant legislation, including occupational safety requirements;
- ii. to give importance to the occupational health and safety of employees in all their operations;
- iii. to take suitable measures for the prevention of occupational illnesses and work-related accidents and to provide employees with a safe and healthy workplace.

2.8. Equal opportunities and diversity

The Group Companies do not tolerate discrimination, humiliation, harassment, violence or insults against employees or other persons. The Group Companies' employees treat partners and suppliers respectfully and fairly, and thus expect suppliers:

- i. to create and maintain an environment where all employees are treated with dignity and respect;
- ii. in hiring and throughout employment, to not discriminate against any employee on the basis of identity traits related to gender, race, nationality, language, ancestry, social status, age, sexual orientation, (dis)ability, ethnicity, membership in a political party or association, religion, beliefs, convictions or views, intention to have a child (children) or other non-job-related characteristics;
- iii. to forbid any physical, sexual, psychological or verbal harassment or coercion of employees.

2.9. Environmental protection

Group Companies conduct their operations in keeping with environmental protection laws, regulations and permits. They encourage suppliers to reduce their environmental impact, and thus expect suppliers:

- i. to comply with relevant and applicable environmental protection laws, regulations and standards;
- ii. to take responsibility for the environmental impact of their operations;
- iii. to install and use technologies that are not harmful to the environment and to follow environmentally friendly business practices.

2.10. Continuous improvement

The provisions of this Code of Conduct set out the most essential standards expected of Group companies' suppliers. A supplier's role begins but does not end in complying with this Code of Conduct. Thus the Group Companies expect:

- i. that if compliance problems or doubts arise with a risk of non-compliance with the standards of business ethics set out in the Code of Ethics, it is the responsibility of the supplier to communicate openly with the Group Company in question;
- ii. that suppliers, in working with their own suppliers and subcontractors, seek that they also comply with the principles of this Code of Conduct;
- iii. that suppliers will continually improve their practices according to the highest standards of business ethics.

3. Sustainable partnership

The Group Companies' goal is to maintain constructive and mutually beneficial relations with all business partners. The Group operates on the basis of trust and agreements and supports the principle of supplier diversity, both in establishing new relationships and in working with local companies and businesses.