

LITANA GROUP OF COMPANIES EQUAL RIGHTS POLICY AND IMPLEMENTATION PROGRAM

I. GENERAL PROVISIONS AND BASIC DEFINITIONS

1.1. The Group of Companies Litana follows The Equal Rights Policy and the Implementation Program (hereinafter referred to as the Policy) is a document that establishes the main principles of equal opportunities applied in the Company and the procedure for their implementation and this is applied to all companies belonging to a group of companies.

1.2. **The purpose of the policy** - ensure equal status of all employees of the Company and persons applying for employment both before and after concluding an employment contract, regardless of gender, race, nationality, language, origin, social status, faith or beliefs, age, sexual orientation, disability, ethnicity, religion.

1.3. The policy is **an internal document of the Company**, mandatory for all employees. All employees of the Company are acquainted with this Policy by signing. Employees must comply with the obligations and principles set out in the Policy when performing their work duties.

1.4. **Discrimination** - direct and indirect discrimination, harassment, instruction to discriminate on the basis of sex, race, nationality, language, origin, social status, faith or belief, age, sexual orientation, disability, ethnicity, religion.

1.5. **Equal opportunities** - implementation of human rights enshrined in international human and civil rights instruments and / or laws of the Republic of Lithuania and / or the Republic of Latvia regardless of gender, race, nationality, language, origin, social status, faith or beliefs, age, sexual orientation, disability, ethnicity, religion. Equal rights at work means equal treatment of workers regardless of their sex, race,

nationality, language, origin, social status, faith or belief, age, sexual orientation, disability, ethnicity or religion.

1.7. **Violation of equal rights** means direct and indirect discrimination, instruction to discriminate, harassment.

1.8. **Indirect discrimination** is a neutral act (omission), an assessment criterion that is formally the same, but their application may, does or could lead to a breach of equal opportunities.

1.9. **Harassment** is unwanted behavior that seeks to insult human dignity, create an intimidating environment, or that causes unpleasant consequences: insulting dignity, creating an intimidating environment.

1.10. **Sexual harassment** means unwanted sexual, personal, written or physical treatment of a person when such behavior is driven by purpose or its effects are detrimental to the dignity of the person, in particular by creating an intimidating, hostile, degrading or offensive environment.

1.1. **Social status** - education, qualification or training and studies acquired by a person in research and study institutions, property, income, need for state support established by legal acts and / or other factors related to the person's financial (economic) situation.

1.2. **Direct discrimination** means treating a person less favorably on grounds of sex, racial, nationality, language, origin, social status, faith or belief, age, sexual orientation, disability, national belonging or religion, than in comparable circumstances. have been or would be applied to another person, except as provided by law.



II. FUNDAMENTAL PRINCIPLES OF EQUAL OPPORTUNITIES POLICY

2.1. The Company does not tolerate forms of direct or indirect discrimination, as well as instructions to discriminate on the basis of gender, race, nationality, language, origin, social status, faith or beliefs, age, sexual orientation, disability, ethnicity or religion.
2.2.The company also does not tolerate any form of harassment, psychological violence, bullying, or abuse of position.
2.3. Decisions related to recruitment, training, compensation, payment for work and other benefits, promotion, leave and conduct at work shall be taken on the basis of objective criteria and factors and without discrimination.
2.4.The Company shall, in accordance with the available opportunities (considering the specifics of the provided services) and available financial resources, take measures to let disabled persons to apply for vacant positions in the Company, as well as to work, pursue a career or study.
2.5. It should be noted that not all cases of equal treatment of employees must be considered as discrimination or other violation of equal opportunities. So-called cases of positive discrimination are not considered discrimination:
2.5.1. special protection of women during pregnancy and childbirth and breastfeeding;
2.5.2. only women are subject to occupational safety requirements which, considering their physiological characteristics, are intended to preserve their health;
2.5.3. certain work that can only be done by a person of a particular gender;
2.5.4. age limits imposed by law, when justified by a legitimate aim and by appropriate and necessary means;
2.5.5. the requirement to know the state language is established by law;
2.5.6. in cases prescribed by law, different rights apply due to citizenship;
2.5.7. special measures established by law in the fields of health care, occupational safety, employment, labor market in order to create and apply conditions and opportunities that guarantee and promote the integration of the disabled into the working environment;
2.5.8. special temporary measures required by law to ensure equality and to prevent any violation of equal opportunities on grounds of age, sexual orientation, disability, racial or ethnic origin, religion or belief;



2.5.9. cases where, because of the nature of the particular professional activity or the conditions under which it is pursued, a particular human characteristic is a normal and decisive professional requirement and that purpose is lawful and the requirement is proportionate.

III. RECRUITMENT AND DISMISSAL

3.1. The Personnel Department is responsible for the Company's search, selection and recruitment process.
3.2.Employment is based on pre-announced criteria, considering the candidate's abilities, competencies, qualifications and knowledge.
3.3. Vacancies in the Company are announced publicly through specialized search portals and/or databases on the Company's website.
3.4. Job search advertisements specify the requirements related to the competencies, experience and abilities required to perform the job function. Vacancy notices shall be designed in such a way that they do not allow candidates to apply only of a particular sex, race, nationality, language, origin, social status, faith or belief, age, sexual orientation, disability, ethnicity or religion.
3.5. The job advertisement/job interview, all requirements/questions are related only to the employee's suitability to perform the job function, his/her competence, professionalism, experience and other similar criteria.
3.6. All questions asked to candidates for vacancies relate to the selection criteria. It is prohibited to request information from a candidate that is not related to his/her state of health, qualifications, or other circumstances unrelated to the direct performance of the job function. Personnel participating in the interview and/or other employees of the Company may not ask any questions about the candidate's gender, age, sexual orientation, social status, disability, race or ethnicity, religion, beliefs or faith, role of the candidate in the home or family, unless if it is directly related to the proper performance of work functions.



3.7. After the employment contract has been concluded with the candidate, the employees of the Company's personnel department inform the employee what information about his/her marital status he/she should provide in order to ensure the application of the guarantees provided by law. The employee may refuse to provide such information. In this case, the personnel department may inform the employee that without

providing the specified information or documents, the Company will not be able to ensure the application of the guarantees provided for in legal acts.
3.8. Bendrovėje taikomi darbuotojų atleidimo iš darbo kriterijai yra susiję tik su darbuotojo kvalifikacija, darbo pareigų netinkamu vykdymu ir kitomis aplinkybėmis numatytomis įstatymuose. Priimant sprendimą dėl darbuotojo atleidimo iš darbo visiems darbuotojams atleidimo kriterijai yra taikomi vienodai, atsižvelgiant į objektyvius kriterijus. The criteria applied in the Company for dismissal of employees are related only to the qualification of the employee, improper performance of work duties and other circumstances provided by law. When deciding on the dismissal of an employee, the dismissal criteria shall be applied equally to all employees, considering the objective criteria.

IV. WORKING CONDITIONS, TRAININGS, REMUNERATION PAYMENT AND PROMOTION OF EMPLOYEES

1.1. The company undertakes to create equal working conditions for all employees (as far as possible considering the specifics of the employee's work), as well as opportunities to improve qualifications, seek professional development, retrain, gain practical work experience, as well as provide equal benefits to employees.
1.2.The salaries of specific positions are set in the Company's remuneration system. The specific salary of a potential or current employee is determined on the basis of objective criteria relating to the employee's abilities, competence, qualifications, experience and knowledge.
1.3. All employees are paid the same for the same work.
1.4. Bonuses and all other employee incentives are based on clear criteria known to employees. If the procedure for the payment of certain benefits or motivational measures has not been discussed or approved by the Company, the Company follows the general principles of equal opportunities, fairness and reasonableness in granting such payments or motivational measures.
1.5.The opportunities for promotion of an employee in the Company depends only on the employee's competence, qualification, available experience and knowledge, achieved work results, quality of work and the Company's ability to provide a higher position to the employee.



V. PROTECTION OF WORKERS AGAINST DISCRIMINATION AND INFRINGEMENT OF EQUAL OPPORTUNITIES

5.1. All employees of the Company (candidates for vacancies) who believe that they have not been provided with equal opportunities or a situation of violation of equal opportunities have the right to file a complaint with the Company.

5.2. An employee may contact their line manager and/or the Head of Personnel Department to report discrimination or a violation of equal opportunities. The confidentiality of such notification/complaint must be guaranteed.

5.3. An employee may also report a violation of equal opportunities anonymously by sending an email to e-mail: personalas@litana-group.com.

5.4. Any employee who notices or receives information about a possible violation of equal opportunities may report it by e-mail personalas@litana-group.com and/or contact the Head of Personnel Department.

5.5. Upon receipt of information or notification of discrimination and violation of equal opportunities, the responsible employee of the Company must clarify the situation and submit the decision in writing as soon as possible, but not later than within 20 working days from the date of receipt of the information.

5.6. The Company ensures that the employee is protected from hostile behavior or negative consequences if the employee files a complaint of discrimination or violation of equal opportunities, or participates in a lawsuit against the Company, its employee or any other person related to the Company.

5.7. Any harassment or hostile treatment of an employee or candidate for a vacancy who has filed a complaint of discrimination and / or violation of equal opportunities is prohibited and is considered a serious breach of duty.

5.8. If it is established that an employee of the Company has committed a violation of equal opportunities, depending on the nature of the violation, measures such as warning of a serious violation of duties and/or dismissal may be applied.



5.9. An employee or candidate for a vacancy may lodge a complaint with the Office of the Equal Opportunities Ombudsman or another competent authority about a breach of equal opportunities. The company undertakes to cooperate with the investigating authority.

5.10. Where it becomes apparent that a complaint or report of a breach of equal opportunities was made in order to damage another employee's reputation, such conduct shall be considered a serious and intolerable breach of duty which may result in dismissal.

VI. POLICY IMPLEMENTATION AND EVALUATION OF EFFECTIVENESS

6.1. The employer shall, within 30 calendar days from the date of adoption of this Policy, instruct the employees of the Personnel Department to acquaint all employees with this Policy in writing, and the Head of the Personnel Department to monitor this Policy.

6.2. For monitoring the implementation of the Policy, the Head of the Personnel Department shall immediately submit a report on the implementation of this Policy to the Company in the event of any event related to this Policy.

6.3. Every employee of the Company has the right to express comments, feedback on the Policy, its effectiveness and to submit proposals for changes or additions to the Policy. Proposals are submitted in person or anonymously through an employee of the Company's Personnel Department responsible for monitoring the implementation of the Policy. For anonymity, suggestions and observations may also be submitted by e-mail: personalas@litana-group.com.

6.4. The effectiveness of the policy is assessed and possible changes and / or additions are discussed once a year and / or as needed.

