

AB VILNIAUS PERGALĖ'S PARTNERS' CODE OF CONDUCT

The AB VILNIAUS PERGALĖ's (hereinafter - VILNIAUS PERGALĖ) Partners' Code of Conduct (hereinafter - Code of Conduct) stipulates the basic principles governing the cooperation with business partners that latter shall respect and meet within their own operations and within their supply chain.

These principles based on Universal Declaration of Human Rights, United Nations (hereinafter – UN) Convention on the Rights of the Child; UN Convention on the Elimination of All Forms of Discrimination against Women, International Labour Organisation (hereinafter – ILO) Declaration on Fundamental Principles and Rights at Work and act as minimum standards for our business relationships.

VILNIAUS PERGALĖ expect from its Partners honest communications, mutual respect, and delivering on commitments. Bribery and any other forms of corruption are prohibited. VILNIAUS PERGALĖ's Partners shall furthermore comply with all professional standards applicable in the industry in which it operates.

COMPLIANCE WITH LEGAL REQUIREMENTS

VILNIAUS PERGALĖ looks forward from its Partners to comply with all applicable national laws and regulations, industry minimum standards and any other relevant legal requirements of the countries in which they operate. In case there is conflict between this Code of Conduct and national legislation, it is recommended to treat legal requirements as a minimum standard.

FORCED LABOUR

VILNIAUS PERGALĖ's Partners shall not use any form of forced and ensure that no rough or cruel treatment occurs in the workplace. This particularly includes sexual harassment, corporal punishment, mental and physical coercion and the verbal abuse of employees. No such conduct may be threatened against employees either.

CHILD LABOR AND THE PROTECTION OF MINORS

VILNIAUS PERGALĖ's Partners shall not use child labor. No child younger than 15 years is allowed to work, subject to exceptions allowed by national or international law. National laws and international standards on the protection of minors must be complied with. Nor may young workers work during night hours.

PROHIBITION OF DISCRIMINATION

All employees shall be treated with respect and dignity, based on their individual ability and qualifications. Any form of discrimination in hiring and employment practices, on the ground of race, gender, age, religion, caste, national origin, disability, political affiliation, sexual orientation, pregnancy, family responsibilities, marital status or union membership, must not be tolerated.

Equal opportunity for women and men must be ensured in all aspects of training, as well as personal and professional development.

Employees may not be prosecuted and must be protected from hostile behavior or adverse consequences if they file a complaint of discrimination or participate in a discrimination case.

FREEDOM OF ASSOCIATION

VILNIAUS PERGALĖ's Partners guarantee its employees the right to freedom of association. Employees have the right to hold meetings in accordance with applicable laws and to establish or join unions and

representative bodies. Employees also have the right to engage in collective bargaining in order to resolve workplace and wage issues.

FAIR REMUNERATION AND BENEFITS

All employees shall be timely paid at least the national legal minimum wages. They must be clearly defined and paid and/or provided at regular intervals. The obligations arising out of the employment relationship must be set out in text form and provided to the employee in the form of an employment agreement. Deductions from remunerations and benefits as a disciplinary measure shall not be permitted.

WORKING HOURS

Employees shall not work for longer than the working hours permitted by law. Official public holidays shall be observed. Overtime shall be voluntary, and always be compensated at a premium rate as defined by national law or with compensatory time. Every employee is entitled to at least one day off after six consecutive workdays. In addition, employees must be guaranteed a minimum daily and weekly rest periods.

SAFE AND HEALTHY WORKING CONDITIONS

VILNIAUS PERGALĖ's Partners shall ensure a safe working environment. Workplaces and work equipment must comply with applicable laws and requirements. Any violations of human rights in the workplace and in operational facilities shall be prohibited. In particular, fire safety and emergency care standards must also be complied with. Employees shall be provided health and safety training in the workplace on a regular basis. It must also be ensured that workplaces are sufficiently hygienic. A management representative shall be appointed to be responsible for ensuring a safe and healthy workplace environment for all employees and for introducing and implementing health and safety standards in the workplace.

DISCIPLINARY ACTION

Disciplinary action must be in accordance with national law and internationally recognized human rights. No unreasonable disciplinary action may be taken, particularly including withholding pay, social security contributions or documents or placing a ban on leaving the workplace.

ENVIRONMENT

VILNIAUS PERGALĖ's Partners shall comply with applicable environmental laws and regulations. Also they shall have knowledge of the environmental impacts of its operations and supply chain and shall continuously strive to reduce impacts and improve environmental performance.

Pollution of the environment shall be avoided to the extent reasonably possible, or at least minimized. Where this can be achieved by proportionate measures, any effects on the environment must be avoided or reduced. Protection of the environment, climate and promoting biodiversity is an ongoing challenge which can only be met by consistently improving the level of protection, achieved by permanently reducing the consumption of resources, level of pollution and emissions and reducing waste. The business partner shall make a reasonable effort to do this in the course of its business activities.

AUDITS

Partners will allow its compliance with the Code of Conduct to be audited. For this purpose, it shall provide written responses to queries and shall allow on-site inspections of its business to be conducted. The business partner shall grant access to relevant documentation to the extent required for the purpose of the respective audit. Third parties (e.g., auditors) may be engaged to carry out the audit. Upon request, the

business partner shall require subcontractors it engages to provide the services to grant corresponding rights of audit.

IMPLEMENTATION

VILNIAUS PERGALĖ Partners shall be expected to implement the principles described in this Code of Conduct in its own business or have at least equivalent standards adopted and conduct its business in accordance with those standards. Partners shall inform subcontractors of the provisions of this Code of Conduct and shall require them to meet the requirements and standards set forth herein.

FINAL PROVISIONS

In the event of any breach of the obligations provided in this Code of Conduct, the partner may be given a reasonable period within which to remedy the breach or, if this is not possible due to the nature of the breach, may be issued with a notice of breach. If partners fails to remedy the breach within the set period or repeatedly breaches the Code of Conduct, the agreement may be terminated without notice. In the case of repeated or serious breaches, the agreement may be terminated without notice, without setting a grace period or issuing a notice of breach. Further rights, particularly any potential claim for damages, shall remain unaffected.