

Approved on 28/22/2022  
by Order No V-22/03  
of the Director General of  
Vilniaus Pergalė AB

## VILNIAUS PERGALĖ PUBLIC LIMITED LIABILITY COMPANY

### DESCRIPTION OF THE PROCEDURE FOR SUPERVISING THE IMPLEMENTATION AND ENFORCEMENT OF THE EQUAL OPPORTUNITIES POLICY

#### SECTION I

##### GENERAL PROVISIONS

1. The Description of the Procedure for Supervising the Implementation and Enforcement of the Equal Opportunities Policy (hereinafter 'the Policy') of Vilniaus Pergalė public limited liability company (hereinafter 'the Company') sets out the provisions for the implementation of the principles of equal opportunities in the Company and the supervision of their implementation.

2. The purpose of the Policy is to set out the main principles and requirements of the Company for gender equality and non-discrimination on other grounds, including the guidelines for their implementation. Violation of the provisions of this Policy shall be treated as a breach of labour discipline for which a disciplinary action may be taken.

3. All employees of the Company (hereinafter 'the Employees') shall be obliged to comply with the provisions of the Policy.

4. The purpose of the Description is to ensure that the principle of equal opportunities and the prohibition of restricting the rights of employees or granting them privileges based on gender, race, nationality, citizenship, language, origin, social status, religion, beliefs or views, age, sexual orientation, disability, ethnicity, religion and other grounds are complied with in the Company during employee recruitment process, validity of employment relations and termination thereof.

#### SECTION II

##### TERMS AND DEFINITIONS

5. **Employee** shall mean a person working or holding a position in the Company under an employment contract, regardless of the form of his/her relationship with the respective company and remuneration.

6. **Candidates** shall mean persons seeking employment with the Company.

7. **Equal opportunities** shall mean implementation of human rights regardless of gender, race, nationality, citizenship, language, origin, social status, religion, beliefs or views, age, sexual orientation, disability, ethnicity, religion and other grounds enshrined in the international treaties or laws of the Republic of Lithuania.

8. **Discrimination** shall mean direct or indirect discrimination, harassment, instruction to discriminate against persons on the grounds of sex, race, nationality, citizenship, language, origin, social status, religion, belief or views, age, sexual orientation, disability, ethnicity, and religion.

9. **Harassment** shall mean unwanted conduct (discrimination) based on sex, race, nationality, citizenship, language, origin, social status, religion, belief or views, age, sexual orientation, disability, ethnic origin and religion seeking to insult or insulting the dignity of an individual and seeking to create or creating an intimidating, hostile, degrading or offensive environment.

10. Other terms used in this Description shall be understood and interpreted as defined in the Republic of Lithuania Law on Equal Opportunities and other legal acts of the Republic of Lithuania.

### SECTION III

#### IMPLEMENTATION OF EQUAL OPPORTUNITIES POLICY DURING EMPLOYMENT

11. All Candidates shall be provided with equal and fair employment opportunities in the Company in accordance with the requirements of legal acts, regardless of their gender, race, nationality, citizenship, language, origin, social status, religion, beliefs or views, age, sexual orientation, disability, ethnicity, religion or other characteristics, and shall be determined only by their education, work qualifications, experience, skills, abilities, business and personal characteristics and criteria for the prompt and high-quality performance of certain work.

12. It shall be prohibited to indicate in the Company's job advertisements requirements that give priority on the ground of gender, race, nationality, citizenship, language, origin, social status, religion, belief or views, age, sexual orientation, disability, ethnicity, religion and other grounds, except in cases provided by law.

13. The selection criteria for employment in the Company must be clear, precise, comprehensive, based only on the business requirements for the Candidates and ensuring equal opportunities and non-discrimination, except in cases established by law. The questions asked to the person participating in the selection must relate only to the selection criteria and the performance of future job functions.

14. When hiring employees, the Company must apply the same objective evaluation selection criteria and conditions adapted to a specific position, unless due to the nature of specific professional activities or the conditions of their performance a certain human characteristic is an essential and decisive professional requirement, and this goal is lawful and the requirement is proportionate.

### SECTION IV

#### IMPLEMENTATION OF EQUAL OPPORTUNITIES POLICY IN THE FIELD OF LABOUR RELATIONS

15. The members of the Company's management bodies and heads of divisions shall ensure by their conduct that the activities in the areas of activity assigned to their responsibilities are carried out in accordance with the provisions of the Policy.

16. All Employees shall be guaranteed under the requirements of the legal acts equal working conditions, equal opportunities for qualification improvement and education, retraining, gaining practical work experience, remuneration or bonuses, and leave, regardless of their gender, race, nationality, citizenship, language, origin, social status, religion, beliefs or views, age, sexual orientation, disability, ethnicity, religion or other grounds.

17. The Employees shall not discriminate, harass, bully or intimidate other Employees on the basis of their gender, race, nationality, citizenship, language, origin, social status, religion, beliefs or views, age, sexual orientation, disability, ethnicity, religion or other grounds.

18. The Employees must immediately inform the Personnel Director of the Company or another person authorised by him/her about cases of discrimination, harassment and sexual harassment with Employees and other persons related to work.

19. The Company shall take appropriate measures to enable persons with disabilities to obtain employment, to work, pursue career or study, including the appropriate adaptation of the premises, provided that such measures do not place a disproportionate burden on the Company.

20. The Employees of the Company performing the selection of employees must be acquainted with the procedure for supervision of the implementation and enforcement of the Policy, observe it in the process of selection of employees and must ensure the application of clear selection criteria.

21. All Employees shall be subject to the same grounds and criteria for dismissal established in the legal acts, related to the employee's qualification and performance of work duties. When deciding on the dismissal of the Employee, the dismissal criteria shall apply equally to all employees regardless of their gender, race, nationality, citizenship, language, origin, social status, religion, belief or views, age, sexual orientation, disability, ethnicity, religion or other grounds.

## SECTION V

### ENSURING EQUAL OPPORTUNITIES IN ESTABLISHING REMUNERATION AND CAREER CONDITIONS

22. Remuneration for specific Employees shall be determined in accordance with the criteria related to their qualification, the degree of responsibility attributed to the employee, the nature of the work performed, the results achieved and other objective criteria that may be established in separate documents. Determination of remuneration shall not take into account the employee's gender, race, nationality, citizenship, language, origin, social status, religion, beliefs or views, age, sexual orientation, disability, ethnicity, religion or other grounds.

23. The Employees must be paid the equal wages for the same or equivalent work regardless of the employee's gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity, religion or other grounds. The same work shall mean performance of work activities that, according to the objective criteria, are the same or similar to other work activities to such an extent that both employees can be replaced without higher costs of the Company. Equivalent work shall mean that, according to the objective criteria, it is no less qualified and no less significant for the Company in achieving its business objectives than other comparable work.

## **SECTION VI**

### **SUPERVISION OF THE POLICY OF EQUAL OPPORTUNITIES**

24. The Company's Personnel Manager or another person authorised by him/her shall be responsible for ensuring that the requirements of the procedure for supervision of the implementation and enforcement of the equal opportunities policy are fulfilled in the Company both in the process of hiring, employment and dismissal.

25. The Employees of the Company and the Candidates who believe that their equal opportunities are violated or are discriminated against shall have the right to contact the Personnel Manager of the Company or another person authorised by him/her and identify the person who possibly violated his/her rights or discriminated against him/her. The Kaizen box installed on the Company's canteen may be used to provide anonymous reporting of cases of discrimination and harassment. The Company's Personnel Manager or another person authorised by him/her undertakes to check the Kaizen box at least once a calendar month.

26. Upon receipt of a complaint of the Employee or the Candidate regarding violation of equal opportunities or discrimination, the Company's Personnel Manager or another person authorised by him/her undertakes to investigate such complaint immediately, within a reasonable time from the date of its receipt and to provide a reasoned response. Information about this complaint shall be considered confidential and may not be disclosed to persons who are not involved in the alleged violation or its investigation.

27. The Employees of the Company who believe that their equal opportunities have been violated shall have the right to apply to the equal opportunities ombudsman in accordance with the procedure established by the Republic of Lithuania Law on Equal Opportunities, regardless of whether the Company's Personnel Manager has been contacted. An appeal to the equal opportunities ombudsman shall not restrict the possibility to defend one's rights in court in accordance with the procedure established by legal acts.

28. Upon receipt of information on any violation of the principles of gender equality and non-discrimination on other grounds, the Company shall immediately, within a reasonable time from the moment of becoming aware of the violation, take action to eliminate such violations and prevent their occurrence.

## **SECTION VII**

### **FINAL PROVISIONS**

29. The Company shall have the right to partially or completely change the procedure for supervising the implementation and enforcement of the equal opportunities policy established in this Description, insofar as it does not contradict the Republic of Lithuania Law on Equal Opportunities, the Law on Equal Opportunities for Women and Men and other legal acts.

30. The Employees shall be acquainted with the approved procedure for supervising the implementation and enforcement of the equal opportunities policy and its amendments by signing or sending a notice by e-mail.

31. The procedure for supervision of the implementation and enforcement of the equal opportunities policy shall be reviewed and, if necessary, updated in the event of changes in the mandatory legal acts governing regulation of this policy. The Company's Personnel Manager shall be responsible for periodically reviewing the procedure for supervising the implementation and enforcement of the equal opportunities policy and, if necessary, submitting it to the Head of the Company's for an update.

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