



The Code of Business Conduct

acbaltica.com

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INTRODUCTION



Purpose and scope of application

The Code of Business Conduct sets standards for employees' behavior in all business, legal, and ethical aspects of their daily activities. It is a tool and guiding document in business relations with customers and partners and in interactions with competitors. This Code is part of the Company's policy and applies to all aspects of our operations, maintaining high standards of business ethics.

The Code of Business Conduct does not and cannot contain detailed instructions for all situations that might occur. Therefore, contact your supervisor, HR, or the Compliance Officer if you face any issues or a conflict.

We expect the managers to take all the necessary steps to ensure compliance with this Code of Business Conduct, particularly by demonstrating through their example and immediately reporting problem situations to the Compliance Officer for further investigation.

We encourage employees to inform their supervisors about any questions or concerns they have for the supervisors to take all measures to resolve conflicts of interest as soon as possible. Retaliation against an individual for asking questions or eliciting problems is unacceptable, even if the investigation does not clearly confirm the suspicion. And please note that in ACBaltica, we do not allow any kinds of dishonest, unfounded, and otherwise offensive complaints (e.g., false allegations); such actions may lead to repercussions.

We expect all employees to work diligently in compliance with the Code of Business Conduct for Employees to achieve the Company's goals and objectives set directly to them. Non-compliance with the provisions of this Code may result in appropriate investigation and other consequences under labor legislation. Besides, this may lead to civil action and liability. Employees will be notified of any changes to the Code of Business Conduct via intranet or email.

Grievance system (Whistleblower Tool)

We believe in maintaining transparency and accountability throughout our company, so we have established various channels for our employees, suppliers, and other stakeholders to report concerns they may have. We are committed to providing a confidential and anonymous grievance mechanism for individuals who may be impacted by our operations.

If you suspect any violations of our Code of Business Conduct, you can use the Whistleblower Reporting Tool in the Corporate Portal. Employees are also encouraged to contact their manager or our Compliance Officer to ask compliance-related questions or express their concerns. We take all allegations of misconduct seriously and carry out an independent and objective examination to address reported incidents appropriately. We treat employee complaints confidentially to ensure privacy and protect those who come forward.

It is important for employees to cooperate in corporate investigations, as refusal to do so may be considered a violation of our Code of Business Conduct. We strictly prohibit any form of retaliation against individuals who report suspicions or participate in an investigation. Furthermore, knowingly making false accusations, repeatedly reporting based on unfounded suspicions, or maliciously attacking individuals with false and defamatory information is strictly prohibited. Violations of these policies may result in disciplinary action.

If you have any questions about the investigative process, concerns about potential persecution, or suspicions of false accusations, please address them to our Compliance Officer. We are committed to fostering a culture of integrity and trust, and we appreciate your cooperation in maintaining ethical standards throughout our organization.

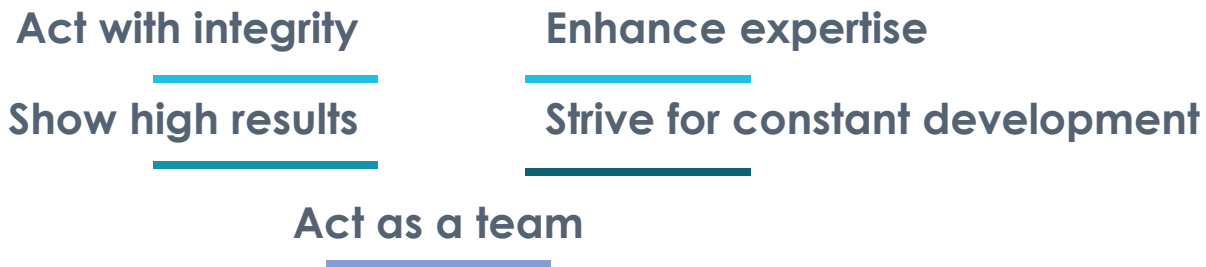
A group of diverse people, including men and women of various ethnicities, are smiling and looking towards the camera. They are dressed in professional or semi-formal attire. The background features a dark wall with a white hexagonal pattern. The text "OUR CULTURE" is overlaid in the center in a large, white, sans-serif font.

OUR CULTURE

ACBaltica's core values

At ACBaltica, our mission is to make a positive impact on how our customers do business. We contribute to their efficiency by providing business consulting services and implementing advanced automation solutions. However, the way we conduct business is just as important as the results we achieve.

At ACBaltica we bring together a team of highly qualified professionals who share the same values that define our approach to doing business:



These shared values guide us in everything we do at ACBaltica. We believe that by upholding these principles, we can create a positive and impactful experience for our customers while fostering a supportive and fulfilling work environment for our team.

Human Rights (incl. child and forced labor)

At ACBaltica, we deeply value and respect human rights. We believe every person deserves fundamental rights and freedoms and are committed to upholding these rights. We treat every individual with dignity and respect and strive to prevent complicity in human rights violations.

Our dedication to human rights is evident in our everyday business practices and the guidance we provide to our employees. We strictly adhere to labor laws in the countries where we operate, and we integrate internationally recognized principles of ethical business conduct.

We support the values outlined in the Universal Declaration of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. These principles serve as a compass for our actions and decision-making.

We constantly search for ways to promote human rights within our operations and influence. We actively work to minimize the risks of child labor, forced labor, modern slavery, human trafficking, and other human rights concerns. If we discover that our actions have resulted in negative impacts on human rights, we take immediate remedial measures within the bounds of the law.

Furthermore, we expect our business partners to share our commitment to human rights. By upholding human rights, we strive to create a fair and just environment for all individuals we interact with and to contribute positively to society.



PEOPLE AND THEIR WORKPLACE, LABOUR STANDARDS

Diversity, discrimination and harassment

Since we strongly believe in treating every employee with dignity and respect, we're committed to providing a work environment free from any form of unlawful discrimination or harassment; it includes behaviors such as intimidation, harassment, hostility, or insulting actions toward fellow employees. We strictly prohibit any conduct that could harm others or make them feel threatened.

Any examples of workplace violence, such as verbal or physical attacks, threats, hostility, intimidation, or aggression, are strictly forbidden. Additionally, making false, malicious, or unsupported accusations against others is also considered a form of workplace violence.

To ensure everyone's safety and well-being, working under the influence of alcohol or drugs is strictly prohibited. We also discourage using any substances or medications that may affect the quality of work.

ACBaltica embraces a policy of gender equality. We do not differentiate salaries or social security conditions based on gender. All employment and career development decisions are solely based on a person's competencies, including their expertise, performance, skills, and qualifications.

We expect all employees to adhere to public morality norms and principles. In ACBaltica, each individual is respected as a unique person with their own values, moral qualities, professional expertise, knowledge, faith, and worldview. Our team members are encouraged to be tolerant, value and respect each other's opinions, and refrain from judging based on mental, physical, or other characteristics.

We are dedicated to fostering a corporate culture built on trust and openness. We aim to improve the team's working environment continuously, promote professional growth, and retain talented employees at all levels. We strive to create a comfortable and supportive workplace for everyone.

Health and safety

In ACBaltica, we make every effort to maintain an environment that supports the physical and mental health of the employees. To ensure a safe and comfortable workplace for everyone, we have certain guidelines in place.

Firstly, we have a strict policy against the use of alcohol or any psychoactive substances while at work. Additionally, bringing weapons or other dangerous objects is prohibited. We believe in maintaining a respectful and safe atmosphere where everyone feels secure. Humiliation, threats, intimidation, or harm to another person or their property is unacceptable.

Since we place great importance on health and safety, all employees and managers receive regular training in this regard. We ensure everyone knows health and safety laws, regulations, policies, and procedures. Staff members are aware of their right to remove themselves without delay and without special permission from situations that threaten their health and safety.

To further support our employees, we provide proper working conditions and access to sufficient occupational medical care and consultations on health and safety. We conduct annual internal safety audits to monitor workplace conditions and make necessary improvements.

We value our employees' feedback and encourage their active involvement in building a healthy organization. Your input and suggestions are vital in helping us maintain a safe and supportive work environment. Together, we can create a workplace where everyone's well-being is a top priority. We appreciate your cooperation and dedication to fostering a healthy and safe atmosphere for all.

Wages and social benefits

In ACBaltica, we respect our employees' right to a reasonable wage that aligns with current market conditions – ensuring it is never less than the minimum wage required by law. When employees work overtime, we make sure they are appropriately compensated. It can be in the form of extra pay, as determined by law or the terms of their employment contract, or through the provision of corresponding time off. We value their dedication and want to ensure they are rewarded for their additional effort.

We pay wages regularly: our employees can expect to receive their salaries at least once a month within the time limits prescribed by applicable regulations. Additionally, we provide employees with detailed information on how their wages are calculated for the relevant pay period, ensuring transparency.

We are committed to supporting our employees' well-being beyond just their wages. They are entitled to paid annual leave, allowing them to take time off and recharge. We also provide various social benefits as mandated by law, further enhancing their work-life balance and overall satisfaction.

It's important to note that we do not endorse wage deductions as a disciplinary measure. We believe in addressing any issues or concerns through open communication and constructive feedback rather than penalizing employees financially.

Working hours

The health of our employees is of high priority to us, and that's why we take a responsible approach to developing our work schedule. We believe that striking a balance between work and personal life leads to increased productivity and a comfortable work environment.

We ensure our working hours align with national laws and relevant collective agreements. We are committed to maintaining a reasonable workload and discourage regular overtime. We closely monitor the total working hours, including overtime, to ensure they do not exceed 48 hours per week. We aim to prevent excessive work hours and promote a healthy work-life balance.

We understand the importance of breaks during the workday and guarantee our employees sufficient time for rest and rejuvenation.

Moreover, we respect the rights of our employees to have at least one day off per week, allowing them to recharge and enjoy personal time. Additionally, we honor statutory and religious public holidays, ensuring our employees can celebrate and spend time with their loved ones.

Career management and training

The most important asset of our company is our human capital. By providing our employees with training and development opportunities, we stimulate their personal and professional development and improve the quality of our services. Moreover, investing in employee training allows us to:

- Increase the motivation of our staff
- Improve our reputation as an employer
- Unlock talents within the company
- Create a culture of continuous professional learning

As part of our training and development program, we arrange subscriptions to training materials, news, articles, and other content that can enable our team to perform better. However, there are two requirements: subscription/material should be job-related, and all applicable fees must be within the amount budgeted for the company.

We enable our employees to prepare for changes that might occur during their employment (for instance, changes in the job description and required skills, technology development) with a wide range of training practices, such as refresher courses or corporate training. We hope our workers make the most of their training and find ways to apply the knowledge in their professional activities.

Employees can contact their manager or HR directly if they need any subscriptions or educational programs. This policy covers all company employees without discriminating against rank or protected characteristics.

INDIVIDUAL ACCOUNTABILITY



Conflicts of Interest

We value the loyalty of our employees, and it's essential for everyone to prioritize the best interests of the Company. Here are some guidelines to help maintain that loyalty:

- Avoid conflicts of interest: Employees should steer clear of situations where their personal or financial interests clash with those of the Company.
- Stay focused on company tasks: It's essential to refrain from pursuing personal gain or self-interest that conflicts with the Company's interests while performing your duties.
- Use business opportunities ethically: Directly or indirectly using company resources or opportunities to obtain personal benefits or create benefits for any person or organization outside the Company is unacceptable.

We understand that employees may have other business interests or engagements outside their work here. Employees are free to participate in other business areas as long as these activities align with our loyalty principles and within the boundaries of their employment agreements.

To give you a better idea, here are a few examples of situations that could potentially create conflicts of interest:

- Secondary employment, as well as work for a competitor company under any form of contract
- Executive positions in other companies
- Financial participation in other companies
- Hiring individuals who have close personal relationships with our employees.
- Employing individuals who have close personal relationships with employees of our customers, suppliers, subcontractors, competitors, or partners.

By being mindful of these principles and avoiding conflicts of interest, we can work together to ensure the continued success of our Company.

Secondary employment

We kindly ask our employees to prioritize their job duties at the Company and refrain from taking on additional work that may negatively impact their ability to fulfill their responsibilities here. If you consider accepting outside employment, we request that you inform your immediate supervisor and obtain written permission beforehand. We understand that unpaid volunteer work can be meaningful, and you do not need to report it separately as long as it does not interfere with your work for the Company or affect our competitive interests.

To maintain a fair and supportive work environment, we kindly request that you refrain from engaging in the following activities without the consent of the Company's management:

- Selling your own products or those of other organizations or providing services similar to what our Company offers.
- Participating in any activities that promote the marketing or sales of products and services offered by our competitors.

In certain cases, we may permit employees to pursue secondary employment with our customers, suppliers, or other business partners, as long as it does not harm the competitive interests of our Company.

Additionally, it is important that our employees do not act directly or indirectly as independent parties in contracts, consultations, or any other activities for our competitors.

If you are considering taking on additional employment with any of our customers, suppliers, or partners, we kindly request that you seek written permission from management, as this can affect the critical business interests of our Company.

Executive positions in other companies

Employees of the Company shall not hold managerial positions in a competitor company, as this generally poses a direct threat to the interests of the Company.

If you are considering accepting a managerial role as a customer, supplier, subcontractor, or partner of the Company, we kindly request that you seek preliminary consent from management. For executive officers of the Company, obtaining consent and prior permission from the Company's Board of Directors is necessary before assuming such a position for a client, supplier, subcontractor, or partner. The same rules apply to accepting similar positions in an organization that is engaged in marketing the products or services of the competitor companies.

An employee may be granted consent to assume a management position for a customer, supplier, or partner, but only under certain conditions:

Assurance that performing these functions will not compromise the employee's loyalty to the Company

The employee will give up the position in case of a severe and ongoing conflict of interest

The employee will abstain from voting on decisions that could directly or indirectly lead to a conflict of interest regarding their loyalty to the Company

The employee will not receive any personal benefits from employment with such an organization except for appropriate remuneration for the duties of the position

Financial participation in other companies

Company employees shall not have any financial interest in organizations that are customers, suppliers, competitors, or partners of the Company if this could or would lead to a conflict of loyalty.

Here are some examples of loyalty conflicts related to financial interest:

- When an employee, in connection with their employment at the Company, influences decisions regarding a customer, supplier, competitor, or partner that could lead to personal financial benefits for the employee;
- When an employee has a financial interest in the Company of a customer, supplier, subcontractor, competitor, or partner that exceeds 20% of the employee's financial resources

A share of more than 20% in the equity of a customer, supplier, subcontractor, competitor, or partner of the Company should be reported to the Compliance Officer immediately after the acquisition for written approval.

Employment of individuals who have a close personal relationship with Company employees

There are no restrictions to the employment of relatives, spouses, or other individuals who have a close personal relationship with the Company's employees unless this poses a risk of a conflict of interest.

To prevent conflicts of interest, we generally do not permit direct subordination between relatives, life partners (whether formalized or not), or other closely related individuals. This policy also applies when the chain of command between individuals with close personal relations includes an Executive.

In cases where such situations arise, we may request one or both of the employees with a close personal relationship to change positions within the Company. At the very least, one employee must be excluded from making decisions that could result in gaining or losing a benefit for the other employee who is closely related. This includes decisions related to hiring, performance evaluations, promotions or pay raises, allocation of responsibilities, and disciplinary actions, among others*.

If employees become aware of a potential conflict of interest, we encourage them to inform their direct supervisor. By doing so, we can take appropriate actions to protect the interests of the Company and its employees.

**Any exceptions to the situations described above must receive approval from the employee's immediate supervisor, the head of the department or unit where the employee works, and the Company Chief Executive. In the case of exceptions involving Company management, approval from the Company's Board of Directors is required.*

Employment of individuals who have close personal relationships with employees of the Company's customers, suppliers, subcontractors, competitors or partners

Relatives, spouses, and other individuals with close personal relationships with our employees are welcome to be employed by our customers, suppliers, subcontractors, competitors, or partners without any restrictions. However, it is important to ensure that these relationships do not result in any negative consequences for the Company. Such consequences could include:

- transmission of confidential information;
- biased decision-making.

In this regard, our employees need to ensure that the work of individuals with whom they have a close personal relationship does not compromise their loyalty to the Company or unduly influence the Company.

To uphold these principles, we require our employees to refrain from participating in decision-making processes involving individuals with whom they have a close personal relationship. This includes activities such as negotiating or finalizing contracts and approving payment documents. It is also important to note that influencing Company decisions when dealing with such individuals is strictly prohibited.

To further reinforce our commitment to avoiding conflicts of interest, we will request employees to sign a Declaration of No Conflict of Interest annually.



PROTECTING ASSETS AND INFORMATION

Confidential information

All documents and information related to the Company's business operations and not publicly available are the property of the Company and shall be considered confidential. It is crucial to maintain the utmost secrecy when it comes to information regarding pricing, product and service development, and trade secrets. Unauthorized disclosure of such data can have severe consequences, including potential harm to the Company, damage to our competitive position in the market, and even a breach of contractual obligations. Therefore, it is important that Company employees refrain from transferring company documents and information to third parties or providing access to company data to anyone outside the organization.

To ensure the protection of confidential information, we include clauses specifically addressing the non-disclosure of such information in all employment contracts. Violating this obligation may result in liability as specified in the employment contract. Additionally, we require each employee to sign a Non-disclosure Agreement to further emphasize the importance of maintaining confidentiality.

It's important to note that information created explicitly for public dissemination is not considered confidential.

As responsible employees, it is our collective responsibility to take necessary and appropriate measures to safeguard confidential and protected information from unauthorized individuals, both within and outside the Company.

Data protection. Right to privacy.

We highly prioritize protecting personal data and privacy rights for all individuals associated with the Company, including employees, job candidates, customers, suppliers, partners, and others whose personal data is stored or processed by us. Our employees need to comply with relevant legal regulations concerning personal data protection and privacy.

Collecting personal data should only be done for legitimate purposes that have been clearly defined prior to the storage process. Any processing of personal data should align with the stated purpose and be in accordance with applicable laws unless specific permissions are granted.

Each employee of the Company holds responsibility for all aspects of collecting, processing and using personal data, as well as providing access to such data in accordance with the law.

It is the duty of every employee, both collectively and individually, to maintain the secrecy and confidentiality of any personal data they have access to during their work. Employees have the right to collect, process, and use personal data or grant access to it only to the extent necessary to carry out their job responsibilities.

BUSINESS INTEGRITY



Bribery and Corruption

The Company has a zero-tolerance policy towards bribery and corruption in any form. It is strictly prohibited for employees to offer, promise, or provide anything of value to decision-makers to influence their decisions in favor of the Company.

We also emphasize that employees should not engage in bribery or corruption in connection with their job responsibilities. Gaining personal benefits or receiving privileges and advantages (excluding wages and fringe benefits determined by the management) from one's activities in the Company is prohibited. It is equally important that employees do not make offers to third parties with the intention of improperly influencing their business decisions.

When it comes to offering or accepting benefits, we adhere to the following principles:

- Legitimate business purpose. Benefits should serve a genuine business purpose and not be aimed at gaining an unfair advantage.
- Compliance with laws and internal policies. All benefits must be given and received in accordance with applicable laws and our internal policies.
- Transparency. The offering and accepting of benefits should be transparent, without hidden agendas or improper motives.

Gifts and invitations to events are part of building relationships and fostering openness with our employees, customers, and partners. However, it is important to note that gifts and social events should not create obligations, hinder objective decision-making, or be used to expedite decisions. Offering gifts to government officials or public sector employees is strictly prohibited.

We define facilitation payments as payments made to government officials that are not required by law or regulation and are intended to secure or expedite a governmental action. We do not permit such "speed-up" payments as a general rule. However, if there are exceptional circumstances where the security of our Company is at stake, such payments should be made and promptly reported to the Compliance Officer for further investigation. Ensuring the safety of our employees is our top priority.

Conduct with Partners and Suppliers

At our Company, we value partnership and collaboration in accordance with the laws of the Republic of Lithuania and international standards. When establishing relationships with business representatives, we prioritize mutual trust, openness, and a willingness to find effective solutions through cooperation.

It is important to note that we do not engage in business relationships with organizations associated with anti-social forces, terrorist activities, or criminal associations. Our commitment to ethical practices ensures we maintain integrity in all our partnerships.

When entering into business transactions, we carefully consider the needs of our partners and respect their corporate values. We strive to create mutually beneficial terms that foster both parties' long-term success. Additionally, we prioritize the confidentiality of information about our partners, ensuring that their sensitive data is protected.

We approach our obligations with a strong sense of responsibility, ensuring that we fulfill our commitments in a timely and professional manner and under the terms of contracts.

Principles of fair competition

At our Company, we believe in fair and transparent competition. To maintain our competitiveness, we focus on improving our performance, delivering high-quality services in accordance with ethical principles, and complying with the applicable laws of the Republic of Lithuania.

When it comes to doing business with competitors, we have clear guidelines in place:

- **Prohibition of Collusion.** We strictly prohibit any form of collusion among competitors. This includes agreements or arrangements that could indirectly impact prices or other terms of sale, such as discounts. Our employees are not allowed to engage in activities that involve setting maximum or minimum prices or exchanging pricing information with competitors.
- **Confidentiality of Company Information:** We emphasize the importance of keeping company-related information within the confines of our operations, including but not limited to:
 - personal information about our employees and their contacts;
 - any details about our organizational structure, positions, responsibilities, and internal processes.

Sharing such information with competitors is strictly prohibited.

- **Legitimate Competitive Intelligence.** We always adhere to legal and ethical means when gathering information about our competitors.
- **Protection of Confidential Information and Intellectual Property.** All employees have a responsibility to protect the confidential information and intellectual property rights of our Company.

Internal and external communication

We kindly request that our employees refrain from initiating direct communication with media representatives or financial analysts on their initiative unless they have appropriate authority. To ensure proper dissemination of business information, we have designated authorized employees responsible for internally and externally sharing information. This helps us maintain consistency and accuracy in our communication efforts. All contacts with the media or analysts must be coordinated and authorized by the Company's Public Affairs Officer or Investor Relations Officer. Company employees unauthorized to disseminate information are required to:

- Direct inquiries from the media to the Public Affairs Officer (Marketing Department), regardless of how the inquiry was received;
- Direct inquiries from financial analysts to the Investor Relations Officer (Finance Department), regardless of how the inquiry was received;
- Not to express their own opinion on behalf of the Company. In the event of expressing a personal opinion, employees shall make every effort to avoid leaving the impression that their opinion may in any way reflect the opinion of the Company.

We also have guidelines regarding the use of company email addresses. It is not permitted to use your corporate email to express political or religious beliefs or participate in consecutive mailings with political or religious content. Additionally, registering your corporate email address on any portals other than those necessary for work purposes is considered unacceptable. We encourage employees to separate personal and corporate accounts for sharing and publishing non-professional content.

Lastly, we expect all employees to take the necessary measures to protect confidential and sensitive information from unauthorized access, both within and outside the Company. By doing so, we maintain the integrity and security of our data and ensure that it remains within the appropriate channels.



ACBaltica UAB

Thanks for your attention!

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