

Klaipėdos terminalo grupė, UAB CODE OF CORPORATE ETHICS

Approved by the Order of the Board of Klaipėdos Terminalo Grupė UAB of 17 August 2022.

INTRODUCTION

We are one of the largest and most economically stable group of companies in the Baltic States, providing complex cargo handling services at our port terminals.

In the course of our activities, we cooperate with various stakeholders - shareholders, employees, partners, customers, institutions, civil society organizations, and individuals. We encourage cooperation based on mutual respect and consideration of different opinions, and we apply extremely high standards of corporate ethics in our daily activities. We understand that our activities create a long-term impact on the general social environment and can contribute to the creation of a responsible business environment.

We aim to create benefits for our stakeholders as well, therefore we must be honest, act ethically and comply with applicable laws and regulations in our activities.

This Code of Corporate Ethics of Klaipėdos terminalo grupė (hereinafter - KTG) and its principles are applicable to all shareholders, board members, directors, management staff, and other employees of KTG and its subsidiaries:

Klaipėdos konteinerių terminalas, UAB

Malkų įlankos terminalas, UAB

Tarptautinės logistikos centras, UAB

SEIA, UAB

KTG Asset Management, UAB

KTG Minija, UAB

AIM Developing, LTD

The provisions of the Code are applied in their relations within KTG or with third parties, regardless of which KTG-owned company they work for, what positions they hold or what functions they perform (finance, accounting, legal, sales, marketing, production, etc.) on behalf of KTG interests.

PURPOSE

The purpose of the KTG Code of Corporate Ethics is to establish the basic principles and rules of corporate ethics in the company and its affiliates, which define ethical behaviour and good corporate practices. These principles are the foundation of our business relationship, helping to implement KTG's core values on a daily basis: reliability, improvement, speed/flexibility, and responsibility.

Our priorities are directed towards the development of KTG, increasing the well-being of employees, sustainable growth, and continuous implementation of innovations in the field.

As a responsible business, we aim to cooperate ethically and honestly with employees, society, authorities, partners, and customers. We expect the same from all stakeholders.

TREATMENT OF EMPLOYEES

Employee welfare is one of the priorities of KTG's activities. Equal opportunities for all, compliance with legal norms, and an ethical approach to other people and the wider social community are the basis of our work.

We respect our employees, encourage their involvement in KTG's activities, and process improvement. We support community spirit in the team and care for each other.

KTG supports and adheres to the principles described in the Universal Declaration of Human Rights and the United Nations Charter in its daily activities. Respect for fundamental human rights is a very important part of KTG's values.

According to our Code, all people working for KTG or otherwise providing services to it, directly or indirectly involved in the provision of services, must be treated with dignity, ethically, and with the utmost respect for their rights.

Equality of people

We do not tolerate any form of discrimination or intention to cause emotional, physical, or psychological fear. We are against humiliating and offensive behaviour. We do not tolerate

threats of violence or any other form of psychological, physical, or emotional intimidation, sexual or any other form of harassment with the purpose of offending the dignity of a person or with the purpose of creating an intimidating, hostile, humiliating, or offensive environment. We are tolerant of gender, expression, age, nationality, race, religion, belief or political opinion, ethnic or social origin, and education. We condemn any discrimination.

We implement the psychological violence and harassment prevention policy, which provides for the procedure for registering and investigating mobbing at work.

We speak out against a hostile work environment where one or more managers or employees seek to offend or offend an employee's dignity, or seek to negatively impact employee's emotional health. We condemn the intentional actions of a person(s) that cause physical, mental, sexual, and economic impact, related to work, on another person(s), as a result of which the employee suffers or may suffer non-monetary or monetary damage.

An employee, who believes that he or she is experiencing or may have experienced violence and harassment, has the right to report it verbally to the manager of the company where he or she works or to send the information by e-mail to the mailbox vek@ktgrupe.lt.

Open dialogue

KTG complies with applicable national laws and standards on employees' working hours, wages, and working environment. All obligations to employees stipulated in international conventions, national laws and regulations governing permanent employment relationships are duly fulfilled.

We support and encourage workers' freedom and right to collective agreements and negotiations. We fully support and encourage constructive dialogue between employees and KTG managers.

Free choice

We do not tolerate any practices of human trafficking, forced labour or forced labour for debt in our company and related supply chains, as well as in any other area of our business.

KTG complies with all applicable national laws and standards regarding the minimum age of employees. We are strongly against child labour and exploitation. The minimum age of employees must be at least 18 years.

Fair remuneration

All employees, regardless of the nature of their work or education, are given the same conditions and opportunities to improve their qualification. Employees are remunerated according to industry market standards and are given additional benefits based on performance. We encourage professional development and fund advanced training. We provide additional motivation for the achieved high performance results.

Work tools

KTG provides all the work tools needed to perform work tasks and basic employee functions. Persons responsible of the company must ensure that all programs used by KTG are purchased legally and are legal.

Company assets provided for the performance of work functions must be handled responsibly, it must be used for its intended purpose and rationally, in compliance with internal rules and instructions. All employees must manage company assets with due care and prevent its damage, loss, theft, or unauthorized use. The assets of the company are intended to meet the needs of the company and may be used for personal purposes only in exceptional circumstances and to the extent agreed with the management.

Health and safety

We feel responsible for our employees, so we provide them with all the necessary tools to enable them to perform their duties competently and safely. We strictly comply with established work safety requirements. We constantly invest in a safe working environment and work tools, as we aim to minimize factors that can negatively affect the safety and health of employees. We constantly remind employees to follow safety rules at every step to protect themselves, their co-workers, and company property.

We insure our employees with additional health insurance, and regularly perform preventive health checks.

Each employee must contribute to creating a safe working environment for himself and his colleagues by following all safety regulations and taking precautions to prevent accidents. Every employee is encouraged to inform KTG management if they see a threat to safety and

health in any area. All suggestions for improving the working environment are always and openly welcome, as we aim to completely avoid accidents at work.

In order to ensure the safety of employees and the quality of the work performed, KTG does not tolerate the use, storage or distribution of alcohol or other psychotropic substances at the workplace. It is strictly forbidden to arrive at the workplace while intoxicated. Failure to comply with this provision of the Code will result in a warning and may result in dismissal.

Information and confidentiality

We recognize the fundamental and inalienable right of every individual to the protection of his/her private life and personal data.

We implement the necessary procedures to ensure that the collection and processing of personal data carried out by KTG in the course of its activities is carried out in compliance with relevant laws and while respecting individuals and ensuring the security and confidentiality of their personal information.

All employees of KTG disclose to the employer only the private information that is necessary for the preparation of documents legalizing the employment relationship. This data is processed in accordance with the company's GDPR policy.

KTG guarantees the storage of confidential information about its employees and does not interfere in the personal lives of employees, but in their daily personal activities, employees must not damage the reputation of the employer, defame it and refrain from any actions that may cause distrust and dissatisfaction of the public, business partners, customers, or other employees.

Before commencement of work, each employee is informed and made aware that any information about KTG that is not disclosed or made public to the public is considered confidential. Employees must comply with all internal policies and procedures regarding the storage and protection of confidential business and personal information.

Each employee has the duty to ensure that confidential information is securely stored, not disclosed to third parties (i.e. not KTG employees), including their family members, and friends.

Confidential information and intellectual property of business partners, customers, and third parties must also be kept responsibly. Within KTG, this information can be shared only with

those employees who need to know such information to perform their main work functions and only to the extent necessary for that.

BEHAVIOUR IN THE SOCIETY

This Code of Corporate Ethics is the foundation of our fair and responsible business relationships. KTG expects that its business partners, customers, and suppliers will be guided by these values and adhere to this code unconditionally.

Operational transparency is one of the most important principles that create value for our company and help maintain the reputation of a reliable partner in the market.

Fair payment of taxes

We always follow the laws and regulations honestly, we openly and transparently provide all the necessary information about KTG's activities to the authorities. We aim to ensure that we as a business organization always pay our obligations to the State and taxes in a responsible, transparent and timely manner.

Prevention of corruption

KTG does not tolerate any form of bribery, as it goes against the concept of ethical business and our principles. We do not give or accept any gifts intended to gain any benefit or to influence decisions.

Neither on the initiative of individual employees nor on behalf of the company can any activity with manifestations of corruption be carried out. Employees must immediately inform the head of KTG about all suspicious cases and attempts to influence by illegal means. He/she, in turn, informs anti-corruption institutions of the State.

KTG and its employees do not participate in money laundering, terrorist financing, or other criminal activities.

Conflicts of interest

The decisions of our employees must primarily serve the interests of KTG, so all employees should avoid situations in which it could appear that their decisions were made primarily based on personal interests, and not the interests of the company.

The employee must immediately inform the manager if it turns out that his/her personal or other circumstances could influence the work in the interests and decisions of KTG or the decisions or work of colleagues.

We do not participate in politics

KTG does not participate in political activities. We do not finance or support political parties or their representatives in any non-financial form. While acting on behalf of the company, KTG employees cannot participate in any political activity or support election campaigns, politicians, political parties, or organizations.

Community Relations

We, KTG, do not have any illegal and unethical relations or connections with government authorities, business or other interested parties. We protect our reputation, so we try every day to maintain business-like and good relations with interested parties, based on honest and open cooperation.

Social Responsibility

We are socially responsible members of the community and genuinely care about maintaining and strengthening relationships with the local community. We provide financial support to various social initiatives and organizations that promote increasing the physical activity of children and youth. We cooperate with educational institutions, together we aim to train qualified employees who can easily enter the labour market. We support various initiatives promoting the cultural education of the community.

We aim to communicate responsibly and honestly about the company's performance, job vacancies, and other news relevant to the community on social networks and other publicly available information channels.

BEHAVIOR WITH PARTNERS AND CUSTOMERS

We strictly and fairly comply with applicable competition laws and regulations. We condemn any cartel agreements, market sharing, arrangements on prices or terms of service, agreements on the exchange of illegal or confidential information with other interested parties with illegal intentions.

We respect our competitors

We apply the principles of fair and ethical competition in our activities. We do not seek to attract customers by deception or unfair practices. Our efforts are aimed at more effective application of our know-how in business processes and by offering solutions that meet customer expectations.

We value partners and customers

Partnership and trust in partners and professional communication with customers directly contribute to the performance of KTG and the development of the company's reputation. We strive to build strong relationships with our customers, we prioritize honest and long-term cooperation. We fully value those partners and customers whose understanding of corporate ethics does not conflict with our values and complies with the principles of good business practice.

We are a growing company, so we are constantly expanding the circle of partners and customers and are open to new opportunities for cooperation. We honour our commitments and agreements and protect the confidential information of our partners and customers.

SUSTAINABLE GROWTH

We pay special attention to sustainable growth in KTG's daily activities, development strategy, and investment projects. KTG conducts its activities in compliance with the

requirements of the environmental protection laws of the Republic of Lithuania, and has all the necessary permits to carry out these activities.

Efficient energy consumption and reduction of CO2 emissions in operational processes are important to us. We invest in renewable energy sources. We aim to contribute to reducing our negative impact on the environment in line with our sustainable development guidelines. We prefer equipment and processes that can help reduce the environmental impact of our operations and improve the use of primary energy sources.

IMPLEMENTATION OF THE CODE

KTG's Code of Corporate Ethics is published on the public website www.ktgrupe.lt, so that customers, the community, and other interested parties for whom this information is important and relevant can familiarize themselves with it.

The head of the KTG and the managers of the companies belonging to the KTG are responsible for familiarising their employees with the Code within one year of its entry into force.

This Code shall be reviewed every three years and amended as necessary.

The KTG Code of Corporate Ethics is approved and, if necessary, amended by the KTG board. All reports on violations of the Code of Corporate Ethics can be submitted by sending information via e-mail to the address vek@ktgrupe.lt.

KTG undertakes not to disclose the data of the person who submitted the report, and handle it professionally and responsibly, as well as to properly protect the person and ensure the confidentiality of the information provided by him/her.