



VILVI GROUP CODE OF ETHICAL EMPLOYMENT

We have created this document so that everyone working in the Vilvi Group companies (hereinafter referred to as the Group) would work together to achieve the highest standards of ethical business and not forget the basic human values: respect, tolerance and caring for others. We aim for every employee to feel respected, valued and safe.

1. Work may be chosen freely. People are employed in the Group of their own free will and may freely terminate the employment relationship by notifying us thereof in accordance with the law.
2. Group leaders respect and support employees' right to peaceful association and collective bargaining. The Group does not interfere with this activity, does not discriminate against representatives elected by employees and allows them to perform the functions represented in the company.
3. In the companies of the Group, safe working conditions that meet the basic human needs are guaranteed. Employees are introduced to the possible dangers inherent in production companies in this area and their activities. The Group shall take all appropriate measures to prevent accidents or damage to the health of employees at their workplace. Employees shall be trained in safety and health issues on a regular basis and such training shall be recorded accordingly. The training shall be repeated for employees undertaking new positions and shall be provided to new employees. The Group aims to improve the working conditions of each employee as much as possible, so that the person working here feels dignified and does not feel discomfort. If accommodation services are provided, the employer undertakes that they shall be clean, safe and shall meet the basic needs of the employees. The head of the company shall be responsible for compliance with occupational safety and health norms in each company of the Group.
4. The company shall not employ children. Young people under the age of 18 shall not be recruited for night shifts or work in hazardous conditions. The company shall comply with the laws and labour legislation in force in Lithuania.
5. The Group shall regularly review salaries and ensure that employees are remunerated appropriately for their work. The guaranteed salary may not be lower than the minimum wage. Before signing the employment contracts, the employee shall be introduced to the working conditions and salary. Every time the salary is paid, the employee shall also receive information about what the salary consists of and for what period it is paid. The company shall not apply disciplinary measures or other deductions from wages not provided for in the Labour Code of the Republic of Lithuania without the consent of the employee.
6. Overtime in the company shall be voluntary. It shall be observed that employees work as many working hours as are provided by national legislation.
7. Every employee in the Group shall be respected. Discrimination based on race, gender, nationality, language, origin, marital or social status, age, sexual orientation, disability, medical condition, ethnicity, membership in a political party or association, religion, faith, belief or opinion shall not be tolerated here. Employees shall not be discriminated against in the fields of employment, remuneration, training, promotion, termination of employment relationship or retirement.

8. Labour relationships in the Group shall be based not only on respect, but also on honesty. Also, they shall not contradict the laws in force in the country. The employer shall seek permanent employment relationships, shall not conclude short-term contracts with employees in order to simply avoid obligations undertaken.
9. The company shall not tolerate harsh or inhumane behaviour, any kind of violence, threat of violence, harassment, insults or other means that humiliate or hurt a person shall be prohibited.

This document, prepared in accordance with the ETI Base Code work practice code of the Ethical Trading Initiative organisation, shall be public, accessible to everyone and published publicly on the Group's website, so anyone who wishes to may get acquainted therewith.

The director of the Management and Quality Department shall be responsible for the implementation and monitoring of ethical employment norms in the Group. Group managers shall be obliged to introduce this code to their teams, suppliers and stakeholders with whom they work.

The Group undertakes to adhere to the principles of ethical employment and shall ensure that the provisions listed in this document are not violated. You may anonymously and confidentially report questionable activities in the field of ethical employment by filling out the Trust Line form on our website www.vilvigroup.lt/pasitikejimo-linija or by e-mailing pasitikejimo.linija@vilvi.eu. You may confidentially report illegal actions in Group companies that pose a threat to the public interest by sending a report in accordance with the procedure provided for in the Republic of Lithuania Law on the Protection of Whistleblowers. You can find more information at www.vilvigroup.lt/praneseju-apsauga. All reports of possible violations shall be examined in accordance with the procedure for receiving and examining the information of the relevant reporting channel through which the information was received. Disciplinary measures shall be taken immediately upon detection of actions that do not comply with the provisions of the Code.

This Code shall be reviewed once a year and updated as necessary.

*Approved in the Vilvi Group companies,
by Order of the General Manager of AB Vilkyškių pieninė of 18 August 2022.*