



## VILVI GROUP CODE OF ETHICS

In order to be a socially responsible, transparent and ethical company, we set requirements for ourselves and our colleagues, which are reflected in this Code. We are convinced that, above all, business must operate transparently, honestly, both with respect to people and the environment. We have created this Code, which is intended for all Vilvi Group (hereinafter referred to as Group) companies, their employees, partners and suppliers. We have chosen the path of a socially responsible company, therefore, we invite our partners to follow it together. The purpose of this Code: to draw guidelines for cooperation – both inside and outside the Group – and thus avoid possible conflicts of interest and violation of ethical business regulations. We aim for all persons acting on behalf of the Group to adhere to the principles set out in this Code.

1. Our employees. We take care of our people, we try to hear what they need. We base our communication on the principles of trust, honesty, responsibility, equality and respect. We encourage open communication and a close collegial relationship throughout the Group. The cooperation of the Group's employees shall be defined in more detail in the "Code of Ethical Employment".
2. Our customers, consumers and business partners.
  - 2.1. We create high-quality and safe food products, therefore positive feedback from consumers and their trust is very important to us. Our products reach even the most distant lands, so we try to take into account not only the needs of the people of Lithuania, but also the people of other countries and respond to their expectations.
  - 2.2. Working with customers, business partners and suppliers is based on mutual trust. We respect collective agreements and confidentiality. Both when operating in Lithuania and abroad, we comply with laws, international agreements and legal acts that guarantee fair competition and trade.
3. Our cooperation with supervisory authorities. We operate transparently, comply with the laws of the Republic of Lithuania and pay our due taxes. Cooperation with supervisory authorities is based on trust and respect.
4. Our community. The Group's factories operate in the regions of the country, therefore cooperation with local people, a significant number of whom work in our Group, is very important to us. We strive to build community and close ties as well as maintain the trust of local people.
5. Our shareholders and investors. The Group's shares are traded on the stock exchange, therefore transparency, openness and responsibility are fundamental things on which our daily activities are based and this allows us to preserve the trust of shareholders and investors. We provide them with reports, information about activities and material changes in the Group.
6. Our competitors. We maintain a respectful relationship with our competitors. We operate in accordance with competition laws and adhere to fair, transparent and ethical business principles.
7. Principles of our work: transparency, trust, responsibility and cooperation. These are the values that we strive to maintain, cherish and protect in the performance

of our activities.

- 7.1. No form of corruption is tolerated in the Group. Employees whose duties and activities in the Group may be more vulnerable in terms of transparency and corruption shall be trained on how to behave so that their actions are not treated as potentially non-transparent (bribery, attempted bribery, pressure, etc.) and which could harm the Group's reputation and destroy the trust of the public and the employees themselves. Group employees shall not give or accept gifts that are provided for any kind of benefit. Every employee shall have the right and opportunity to report if they suspect or notice that someone in the Group is acting in a non-transparent manner or is violating the law.
- 7.2. We ensure that conflicts of interest shall be avoided in the Group. Every person who is going to be employed must inform about a possible conflict of interest when he/she starts working for the Group. Employees are encouraged to avoid situations that may lead to a conflict of interest. In case of doubt or upon noticing a suspicious situation, the employee must report it to his/her manager or the person responsible for the transparency of the Group's activities, who must guarantee complete confidentiality. We trust our employees and hope that their behaviour and personal interests will not clash with the Group's principles of transparent and ethical business.
- 7.3. The Group does not support political parties and does not participate in political activities. Employees are not prohibited from participating in political activities, but this must be clearly separated from the duties and responsibilities while working in the Group. An employee involved in politics must ensure that the political positions expressed or supported by him/her shall be treated as a personal opinion and not as a position of the Group. The employee must be sure that his/her political activities shall not harm the Group and its reputation.
- 7.4. Each employee shall be informed and clearly told that any internal information of the Group that is not made public shall be considered to be confidential, protected by the Group itself, and may not be disclosed to third parties, i.e. family members, friends or others who do not work for the Group. Upon disclosing the Group's confidential information, the employee may be subject to legal liability. The obligation to protect the Group's confidential information and the legal liability for violation of this obligation shall remain in force even after the employee leaves the Group. Employees, without the permission of the person responsible for communication in the Group, may not comment, speak or express opinions on issues related to the activities of the Group in the media and public space (including social networks). Even if the published information or opinion is not directly related to the Group's activities, the employee may not comment or publicly express thoughts that would offend or humiliate other persons, their groups, and thus could damage the Group's reputation. Respect is essential and must be maintained both in relationships within the Group as well as with stakeholders.



This Code is public and available on the Group's website so that every employee, customer, business partner, supplier or any of the interested parties may get acquainted therewith and know the Group's ethical business principles so that ethical business practices become a natural and inviolable process. The Sustainability Manager shall be responsible for the implementation and monitoring of business ethics norms in the Group. Group managers shall be obliged to acquaint their team members with this document so that everyone working in the Group is aware of the principles of ethical business and follows them. We aim to make our activities relevant and useful to people inside and outside the company, as we wish to remain a socially responsible company both in our country and respected by our foreign partners and consumers.

The Group undertakes to adhere to the principles of ethical business 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 business by filling out the Trust Line form on our website [www.vilvigroup.lt/pasitikejimo-linija](http://www.vilvigroup.lt/pasitikejimo-linija) or by e-mail [pasitikejimo.linija@vilvi.eu](mailto: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](http://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.*