

EMPLOYEE CODE OF ETHICS CHAPTER I GENERAL PROVISIONS

1. The Code of Ethics for Employees (hereinafter referred to as "the Code of Ethics ") of UAB Transvera (hereinafter referred to as "the Company") sets out general rules of conduct that promote a culture of trust and transparent and open relations within the Company. The implementation of the Code of Ethics is aimed at building confidence in the professional conduct of the Company.

2. Key concepts of this Code of Ethics:

2.1. **ethical violation** - an act performed in violation of the principles set out in this Code of Ethics and generally accepted ethical standards;

2.2. **customer** means a person to whom the Company's services and any of the Company's business products are provided. Customers also include business partners, customers, carriers, service providers, suppliers of goods, contractors, designers, etc.

2.3. other terms shall be as defined in the law.

3. The Code of Ethics applies to all employees of the Company and others acting on behalf of the Company.

4. Key principles for ethical business conduct:

4.1. **responsibility**. Company employees must be accountable for the decisions they make, the actions they take and the consequences of those actions. Employees must use their behavior to create a positive image of the company;

4.2. **cooperation**. Employees are encouraged to work as a team to achieve a common goal, to share their experience and knowledge in good faith and to seek mutual understanding.

4.3. **efficiency**. Employees must achieve their performance at the lowest possible expenses and use the allocated resources to improve work performance in other ways;

4.4. **innovation**. The company encourages employees to strive for improvement and change, to seek new and more advanced working tools and methods, and to understand that innovation is the key to the success of the company. Employees must strive for innovation;

4.5. **meeting customer needs**. Each employee must contribute to the quality of the services provided, responding to the needs of the customer and thereby increasing the value and productivity of the company;

4.6. **equality, respect and dignity**. Employees must treat all people equally, regardless of their nationality, race, gender, language, origin, social status, religious beliefs, political opinions, etc.;

4.7. **objectivity**. The decision-making and other actions of the Company's employees must be impartial, based on the facts and not on subjective judgement;

4.8. **transparency and openness**. The activities of the company must be public and open to evaluation, without prejudice to the confidential information of the company and its customers, including trade secrets. Employees must ensure the transparency of their actions, decisions and work, avoid conflicts between public and private interests, and provide information to public authorities and the general public in the cases provided for by law, in accordance with the confidentiality obligation;

4.9. **legality**. Employees must respect individuals, their rights and freedoms and comply with the law and the requirements of the company's internal regulations in their work;

4.10. **confidentiality**. Employees of the Company must ensure the protection of the confidential information of the Company and its customers.

4.11. **fair competition**. The Company and its employees shall deal with competitors in a transparent, respectful, trustworthy and fair manner, in accordance with their statutory obligations to compete fairly.

4.12. **environmental protection.** The Company shall promote the sustainable use of nature and its resources. The Company is aware that being a haulier burns a lot of fuel and emits a significant amount of CO2 into the air, therefore the Company is constantly updating its fleet of trucks and chooses those trucks which are built according to EURO6 standards and which emit less CO2 into the environment. The company promotes all campaigns, initiatives and measures to save the environment. Employees are obliged to moderate their use of office paper, stationery, tissues, electricity, water, heating and other resources that can be reduced or are not necessary, and to strive for recycling and sustainable consumption habits, both inside and outside the office;

4.13. **donations and charitable giving.** The Company shall, to the best of its ability, support non-profit organizations, educational institutions, and charitable donations to those in need. Cash, any other tangible assets, works, services shall be carried out on behalf of all employees of the company.

5. Employees undertake to abide by the Code of Ethics and the principles set out therein. Employees shall conduct themselves in such a way that they can be trusted from the point of view of a person of integrity and that there is no reason to believe that they are in breach of this Code of Ethics or any other legal requirements.

6. The provisions of the Code of Ethics shall apply to the extent that ethical norms are not laid down by the laws and other legal acts of the Republic of Lithuania.

CHAPTER II STANDARDS OF BEHAVIOUR

7. Employees know that the customer's impression of each employee is important. The company operates in a way that gives customers confidence in the company. In their dealings with customers, employees:

7.1. behave in a friendly, respectful and courteous manner, without prejudice, showing sympathy, antipathy or special consideration, and without giving the appearance of undue favoritism towards some, or ignoring or discriminating against others;

7.2. provide quality work and services regardless of the national, racial, social, religious, age or other differences of the clients;

7.3. cooperate in partnership and for mutual benefit;

7.4. deliver on promises on time;

7.5. avoid actions that could be perceived as expecting gifts;

7.6. respect privacy, handle personal client information responsibly, and protect secrets and confidential information even after the end of the contractual relationship;

7.7. be empathetic and responsive to the needs of the client, try to prevent problems, and resolve disputes and conflicts amicably;

7.8. provide correct information about the services provided by the company and their prices;

7.9. avoid misleading and categorical statements.

8. Relationships within the company are based on the following norms of behavior:

8.1. employees:

8.1.1. do not restrict each other's rights or grant privileges on the basis of sex, origin, language, social status, religion, age, beliefs, opinions or other differences;

8.1.2. treat each other with respect, irrespective of individual differences, abilities or personal characteristics;

8.1.3. observe the principles of goodwill and endeavor to establish mutual trust. Harassment, discrimination or other inappropriate behavior in the workplace is not tolerated. Avoided in relations with colleagues:

8.1.3.2. humiliating or offensive behavior;

8.1.3.2. public discussion of personal characteristics;

8.1.3.3. denigration of work;

8.1.3.4. incitement to discord;

8.1.3.5. psychological tension;

8.1.3.6. mobbing (mobbing is defined as prolonged, systematic psychological violence at work, perpetrated

by a group of workers against one individual);

8.1.3.7. voice raising;

8.1.3.8. public displays of negative emotions;

8.1.3.9. other improper behavior.

8.1.4. shall not derive personal benefit at the expense of the Company. No person shall take unfair advantage of the company through his/her connections or position. Conflicts of interest shall be managed on the following principles:

8.1.4.1. avoid circumstances arising from personal relationships that would be prejudicial to the interests of the enterprise;

8.1.4.2. if the possibility of a conflict of interest arises, recuse himself/herself and inform the Head of the undertaking;

8.1.4.3. not to perform other undertakings for other persons 'or companies' benefits during work.

8.1.4.4. not to use company assets in the performance of secondary duties;

8.1.4.5. not to use the name, information, assets or contacts of the Company for personal gain;

8.1.4.6. declare potential conflicts of interest in accordance with the established procedures and take steps to resolve any conflict situation promptly and decisively.

8.2. managers:

8.2.1. treat employees under their authority with respect and restraint. Instructions, orders, comments to subordinates shall be correct;

8.2.2. show respect for each other by ensuring that physical, psychological or other forms of violence are not used at work;

8.2.3. strive to create a working and friendly environment, to prevent conflicts and to eliminate the causes of disagreements;

8.2.4. objectively assess the qualities and performance of subordinates and other employees;

8.2.5. provide explanations to subordinate employees on the application of the Company's internal legislation;

8.2.6. demonstrate that the views of employee member are valued;

8.2.7. give due recognition and appreciation to the performance of employee's members;

8.2.8. to strengthen and develop a good company culture where employees are free to express their opinions and ideas;

8.3. company:

8.3.1. the selection and promotion of employees is based solely on competence and performance;

8.3.2. develop appropriate and effective internal rules, procedures, a suitable working environment and non-discriminatory labour standards;

8.3.3. introducing employees with the internal/local regulations of the company;

8.3.4. seek to inform and train employees on environmental requirements and encourage them to reduce any environmental impact by conserving natural resources, raw materials and energy, and by properly managing and reducing waste;

8.3.5. provide safe working conditions, prevent potential damage, and make efforts to ensure that employees are safe and stress-free at work.

9. The acceptance and provision of benefits, understood as gifts, gratuities, hospitality, employment, services, discounts, concessions, privileges, no cost, information, etc., shall be based on the following provisions:

9.1. prohibited:

9.1.1. the granting and acceptance of benefits where the purpose of the benefit is to influence the actions or decisions of the employee;

9.1.2. accepting benefits if they are provided by potential or actual participants in the Company's purchasing or sales procedures;

9.1.3. accept benefits if they could create a conflict of interest or the appearance of a conflict of interest;

9.1.4. accept and give gifts of money;

9.1.5. accept and provide benefits, gifts in the form of alcoholic beverages, other than moderate business

gifts in the form of alcoholic beverages provided/received by the Company itself, and which are a token of appreciation;

9.1.6. induce in any way the solicitation of benefits from clients or other persons.

9.2. the expenses incurred by the Company's employees in visiting business partners, attending seminars, conferences, exhibitions, etc. shall be borne by the Company. The cost of an employee's attendance may be borne by the interested party, subject to the written approval of the Head of the Company.

CHAPTER III FINAL PROVISIONS

10. Compliance with the Code of Ethics is a matter of honour. The Code of Conduct is based on the self-awareness and conscience of the staff, the weight and moral authority of public opinion, and not on sanctions. Violations of the Code of Conduct shall be decided by the Head of the Company.

11. The disclosure of information about its activities shall be based on authenticity, regularity and objectivity. Information shall be provided on behalf of the company only by the head of the company or an employee authorized by him.