



APPROVED:
AB „ROKIŠKIO SŪRIS“
14 NOVEMBER 2022 BY THE
DIRECTOR
ORDER NO 60

ANTI-CORRUPTION POLICY

I GENERAL PROVISIONS

The purpose of the Anti-Corruption Policy of AB "Rokiškio sūris" (hereinafter - the Company) is to provide guidance on the fight against corruption and bribery, to define the Company's general attitudes and guidelines, and to create a corruption-resistant environment in the Company, to raise anti-corruption awareness, and to tolerate no corruption in any of its forms.

Definitions

1.1 *Corruption* is defined as the abuse of entrusted power to obtain personal gain for oneself or another person in return for the performance or non-performance of acts within the scope of one's official duties, as well as the act or omission of a person to seek, demand, or obtain a pecuniary or other personal gain for oneself or for another person, or the direct or indirect offer or granting of a pecuniary or other personal benefit (gift, favour, promise, privilege) to a person in return for the performance or non-performance of acts within the scope of one's official duties, or the mediation of any of the foregoing acts. Benefits may be financial or non-financial. Corruption includes all acts of a corrupt nature as defined in the applicable legislation of the Republic of Lithuania.

1.2 *Bribery* - the offering, giving, authorising, soliciting, accepting or receiving of a financial or other benefit with the intention of inducing the improper performance of functions or the abuse of a position. A bribe need not necessarily be in monetary form.

1.3 *Payments to facilitate business transactions* - payments to public officials to facilitate or expedite transactions.

1.4 *Gift* - a benefit, material or otherwise, to which the employee has no private right and which confers on him an advantage in a material or immaterial position.

1.5 *'Private Interest'* means a personal pecuniary or non-pecuniary interest of an employee of the Company or of his/her close associates

II ANTI-CORRUPTION POLICY PRINCIPLES

2.1 The Company's activities are guided by the principles of business practice:

2.1.1 Responsibility. 1.1.1.1 The Company shall conduct its business responsibly.

2.1.2 The principle of personal example of managers. The Company and its business unit managers are held to a higher standard of performance and responsibility than non-management employees. The Company's employees have a reasonable expectation that managers are not only more professionally qualified, but also act in accordance with higher standards of morality and ethics. The reputation, awareness, behaviour and attitude towards corruption of the managers, which form the Company's zero-tolerance culture towards corruption, can ensure the effective functioning of the anti-corruption management system.

2.1.3 Transparency and legality. The Company shall act responsibly, clearly and openly at all stages of its activities (in making selections, organising procurements, ensuring competition requirements, etc.), comply with the requirements of the legislation in force in the Republic of Lithuania, cooperate willingly with authorities and, if necessary, provide the required information specified in the legislation, and shall not tolerate direct and indirect manifestations of influence peddling, including illegal lobbying.

2.1.4 Principle of ethical behaviour. The Company seeks the trust, confidence, transparent declaration of interests and good reputation of its business partners, customers, employees and, therefore, shall not tolerate any actions and forms of corruption as provided for in the Policy which may adversely affect or damage the Company's reputation.

2.1.5 Principle of Integrity. Employees working for the Company shall be required to perform their functions and work in a fair and transparent manner, taking into account the principles of impartiality, priority of the Company's interests, legality and confidentiality.

2.1.6 Principle of Inclusion. Employees shall be kept informed about the Anti-Corruption Policy implemented by the Company and shall be involved in the implementation of individual anti-corruption control measures.

2.1.7 Principle of adequacy of anti-corruption control measures to the risk of corruption .Development and implementation of anti-corruption measures based on the criterion of effectiveness of the chosen measure and aiming at the lowest possible administrative burden.

2.1.8 Principle of inevitability of liability. Any employee of the Company who commits an act of a corrupt nature, irrespective of the position held, functions performed, merits to the Company, shall be held liable in accordance with the procedure established by legislation.

III POLICY IMPLEMENTATION

3.1 In order to implement these principles and values within the Company:

- No employee shall directly or indirectly offer, accept, authorise, give, solicit or receive a bribe;
- staff responsible for recruitment, training and promotion must ensure that competent personnel procedures are followed;
- it is prohibited to offer, transfer, authorise, give or promise, directly or indirectly, any gift to a public official, civil servant or other interested person which may suggest that it is intended to influence them and to gain personal or business advantage;
- the abuse of his/her official position, understood as the use of the rights, duties or powers conferred by the Staff Regulations to an extent contrary to the interests, principles and content of the post. Exceeding the powers conferred shall be prohibited.
- Employees must avoid circumstances and situations where their private interests may conflict with the interests of the Company. The Company expects employees to make sound, rational decisions at all times in the performance of their duties and not to seek personal gain.

3.2 In order to implement this policy, the Company seeks to demonstrate the credibility of its partnerships with its business partners, suppliers and customers and does not tolerate any form of corruption, and the Company's management publicly expresses its strong support for anti-corruption. Bribery or the offer or acceptance of any other form of gratuity is prohibited.

3.3 The anti-corruption provisions shall apply to all employees, agents, intermediaries, suppliers, subcontractors of the Company.

3.4 The supplier selection process shall not be based on gifts or personal preferences. Supplier selection must be based on a documented process that confirms the selection of a particular supplier. Purchases and sales shall be carried out in accordance with the law, with maximum transparency and fairness. Individual cases shall be investigated where necessary to avoid risks arising from bribery and corruption involving third parties.

3.5 In all cases, employees must exercise good judgment in giving or accepting business gifts and other benefits offered to them and must consider whether they are intended to have an undue influence and whether such gifts or other benefits offered to employees are within the bounds of normal practices inherent in fair business relationships.

3.6 Trading in influence is defined as the unlawful act of an employee of the Company using his/her position, authority, relationship and/or acquaintance in the work environment, or other likely influence, to influence other employees, other companies, institutions or organisations to act (or, conversely, to fail to act), whether lawfully or not, within the scope of their authority.

3.7 Events designed to build and strengthen relationships with business partners and suppliers, gifts, activities shall be organised in good faith, in accordance with applicable laws, the Company's local acts and this Policy.

3.8 The Vindication Director of the Company shall be responsible for stopping the implementation of the Policy.

IV NOTIFICATIONS OF INFRINGEMENTS

4.1 Information about any breach or suspected breach of the Policy must be reported to the Head or communicated confidentially through the following channels:

Email: socialline.atsakomybe@rokiskio.com

Tel. +370 458 55302

4.2 The Company undertakes not to disclose the identity of the person making the report.

4.3 The Company shall deal with the notifications received in accordance with the procedures in force at the Company: "Procedure for the submission and handling of complaints, problems, enquiries and requests" BP 10 P002-PS.