



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

EQUAL OPPORTUNITIES POLICY AND IMPLEMENTATION PROGRAMME

I. GENERAL PROVISIONS

1. AB "Rokiškio sūris" (hereinafter referred to as "the **Company**") has adopted the following Equal Opportunities Policy and Implementation Programme (hereinafter referred to as "the **Policy**"), which establishes the main principles of equal opportunities applied in the Company and the procedures for their implementation.
2. The aim of the policy is to ensure equal treatment of all employees and applicants for employment, both before and after the conclusion of the employment contract, regardless of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin, religion.

II. CONCEPTS

3. **Discrimination** - direct and indirect discrimination, harassment, or directing discrimination on the grounds of sex, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin, religion.
4. **Equal opportunities** - the implementation of human rights enshrined in international human and civil rights instruments and the laws of the Republic of Lithuania, regardless of gender, race, nationality, citizenship, language, origin, social status, faith, beliefs, or attitudes, age, sexual orientation, disability, ethnicity, religion. Equal opportunities at work means equal treatment of workers irrespective of the worker's sex, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin or religion.
5. **Equal opportunities offences** include direct and indirect discrimination, directing discrimination and harassment.
6. **Indirect discrimination** - an act or neutral act/omission, a rule of law or a criterion of assessment which is formally identical but which, when applied, may, does or could result in a breach of equal opportunities.
7. **Harassment** is unwanted behaviour that is intended to violate a person's dignity, create an intimidating environment, or cause unpleasant consequences.
8. **Sexual harassment** is unwanted abusive conduct of a sexual nature, whether verbal, written or physical, towards a person, where such conduct is motivated by the intention or effect of the conduct to violate the person's dignity, in particular by creating an intimidating, hostile, degrading or offensive environment.
9. **Social status** - a natural person's education, qualifications or training and studies at research and study institutions, possessions, income, need for state support as defined by law, and/or other factors related to the person's financial/economic situation.
10. **Direct discrimination** - treating a person less favourably on grounds of sex, race, nationality, citizenship, language, origin, social status, religion, religion, belief or opinion, age, sexual orientation, disability, ethnic origin, or belief, than another person is, has been, or would be treated in similar circumstances, subject to the exceptions provided for by law.

III. BASIC PRINCIPLES OF EQUAL OPPORTUNITIES POLICY

11. The Company does not tolerate direct or indirect forms of discrimination, including discrimination on the grounds of sex, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual

orientation, disability, ethnic origin or religion, health, marital or family status, membership of a political party, trade union or association, intention to have a child, or because the employee exercises or has exercised rights under the Labour Code of the Republic of Lithuania.

12. The company also does not tolerate harassment, psychological violence, bullying or abuse of position in any form.
13. Decisions relating to recruitment, training, competence development, remuneration and benefits, promotion, leave and conduct at work shall be taken on the basis of objective criteria and factors and without discrimination.
14. The Company shall take measures, within the limits of its capabilities (taking into account the specific nature of the services provided) and the financial resources available, to enable persons with disabilities to apply for vacant positions within the Company, as well as to work, pursue a career or undergo training.
15. It should be noted that not all cases of unequal treatment of employees should be considered discrimination or other violations of equal opportunities. Discrimination does not include so-called *positive* discrimination:
 - 22.1. Special protection for women during pregnancy and childbirth and breastfeeding;
 - 22.2. women only are subject to occupational safety requirements that aim to preserve their health by taking into account their physiological characteristics;
 - 22.3. a specific job that only a person of a particular gender can do;
 - 22.4. legal age limits, where a legitimate aim justifies it and that aim is pursued by appropriate and necessary means;
 - 22.5. a legal requirement to speak the national language;
 - 22.6. Different rights apply in different statutory cases because of your nationality;
 - 22.7. Special measures, established by law, in the fields of health, safety, employment and the labour market, to create and apply conditions and opportunities that guarantee and promote integration into the working environment for people with disabilities;
 - 22.8. special temporary measures imposed by law to ensure equality and prevent the violation of equal opportunities on grounds of age, sexual orientation, disability, racial or ethnic origin, religion or belief;
 - 22.9. cases where the nature of the professional activities in question, or the conditions in which they are carried out, make a particular human characteristic a normal and decisive occupational requirement, and where this objective is legitimate and the requirement is proportionate.

IV. RECRUITMENT AND DISMISSAL

16. The Personnel Department is responsible for the recruitment, selection and placement of staff within the Company Personnel Section.
17. Recruitment would be based on pre-publicised criteria, taking into account the candidate's abilities, competences, qualifications and knowledge.
18. Vacancies in the Company are advertised publicly through specialised search portals or databases.
19. Job advertisements specify the competences, experience and skills required for the job function.
20. In the job advertisement/interview, all requirements/questions are limited to the employee's suitability for the job function, his/her competence, professionalism, experience and other similar criteria.
21. All questions asked of candidates for vacant posts relate to the selection criteria. It is forbidden to ask a candidate for information that does not relate to his/her state of health, qualifications or other circumstances not related to the direct performance of the job function. Staff members present at the interview may not ask any questions about the candidate's sex, age, sexual orientation, social status, disability, race or ethnic origin, religion, beliefs or faith, or the candidate's role in the home or family, except where this is directly related to the proper performance of the job.
22. Once a job candidate has been awarded a contract of employment, the Company's HR staff should inform

the employee of the information he/she should provide about his/her marital status in order to ensure the application of the guarantees provided by law. The employee may refuse to provide such information. In such a case, the Human Resources Department may inform the employee that failure to provide the specified information or documents will prevent the Company from providing the employee with the guarantees provided for by the legislation.

23. The Company's criteria for dismissal are limited to the employee's qualifications, misconduct and other circumstances provided for by law. The criteria for dismissal shall be applied equally to all employees, taking into account objective criteria.

V. EMPLOYEE CONDITIONS, QUALIFICATION, PAYMENT AND REIMBURSEMENT

24. The Company undertakes to provide all employees with equal working conditions (as far as possible taking into account the specific nature of the work performed by the employee), as well as opportunities for further training, professional development, retraining, practical work experience, and equal benefits for employees.
25. The salary levels for specific posts are set out in the Company's remuneration system. The specific salary level for a potential or existing employee is determined on the basis of objective criteria relating to the employee's skills, competence, qualifications, experience and knowledge.
26. All employees are paid the same wage for the same or equivalent work.
27. An employee's opportunities for promotion within the Company depend solely on the employee's competence, qualifications, experience and knowledge, performance, quality of work and the Company's ability to promote the employee.

VII. PROTECTION OF WORKERS AGAINST DISCRIMINATION AND IN THE EVENT OF A BREACH OF EQUAL OPPORTUNITIES

28. Any employee of the Company (applicants for vacant positions) who feels that they have been denied equal opportunities or that a situation of violation of equal opportunities has arisen in relation to them has the right to lodge a complaint with the Company.
29. To report discrimination or a violation of equal opportunities, a staff member may contact Head of Unit or HR Manager. The confidentiality of such a report/complaint must be guaranteed.
30. Employees who report or become aware of an equal opportunities violation or a possible equal opportunities violation can also report it anonymously - email socialline. atsakomybe@rokiskio.com, tel. 8458 55302, and through the company's request, complaint and suggestion boxes.
31. The responsible employee of the Company shall, upon receipt of information or a report of discrimination and violation of equal opportunities, within the shortest possible time, but not later than within 15 working days from the date of receipt of the information, together with a committee set up by the Director of the Company, shall submit to the Director a reasoned conclusion stating whether the report is substantiated and, in such case, suggesting specific measures, both in the case of the offender and in general, to prevent the recurrence of such cases; or, whether the report is not substantiated; or, shall refer such complaint to the Office of the Ombudsman for Equality of Opportunities or to any other competent authority without delay for investigation. Information about such a complaint shall be treated as confidential and shall not be disclosed to persons who are not involved in the alleged violation or its investigation.
32. The Company shall ensure that an employee will be protected from hostile treatment or adverse consequences if the employee files a complaint of discrimination or violation of equal opportunity, or is involved in a discrimination lawsuit against the Company, an employee of the Company, or any other person in any way associated with the Company.
33. Any form of harassment or hostile behaviour against an employee or job applicant who has made a complaint of discrimination and/or violation of equal opportunities is prohibited and constitutes a serious breach of employment obligations.
34. An employee or candidate for a vacant post may lodge a complaint with the Office of the Equal Opportunities Ombudsman or other competent authority in respect of a breach of equal opportunities. The Company undertakes to cooperate with the investigating authority.

35. Where it appears that a complaint or report of a breach of equal opportunities has been made with the intention of bringing another employee into disrepute, such behaviour is considered serious and intolerable misconduct.

VIII. POLICY IMPLEMENTATION

36. Every employee of the Company shall have the right to express comments and feedback on the Policy, its effectiveness and to submit proposals for amending or supplementing the Policy. Suggestions shall be made in person or anonymously through the Company's employee responsible for monitoring the implementation of the Policy. In order to ensure anonymity, suggestions and comments may also be submitted by e-mail to socialine.atsakomybe@rokiskio.com, by phone to. 8458 55302, as well as through the Company's request, complaint and suggestion boxes.
37. The Policy is the Company's internal procedural document and is binding on all employees. Employees must comply with the obligations and principles set out in the Policy in the performance of their job functions.
38. This procedure shall be reviewed and, if necessary, updated, amended in the event of changes in mandatory legislation in the field of regulation of this policy, by order of the Director of the Company.
39. The Company shall have the right to amend this policy in part or in full. Amendments shall be communicated to employees and other responsible persons either by signature or electronic means.
40. This Policy shall enter into force on the date of its adoption.

Prepared by:
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