



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

## CODE OF ETHICS

AB "Rokiškio sūris" is a modern Company with a high working culture, producing the highest quality products that meet the requirements of international and Lithuanian standards. Rokiškio sūris is well aware of its responsibility to its customers, employees, partners, environment and society, and therefore conducts its business based on internationally recognised human and employee rights, applies the principles of socially responsible business, and operates in a transparent, trustworthy and fair manner.

### *Application of the Code*

The Code of Ethics aims to:

- Disclose and reinforce the Company's values, principles and standards of conduct.
- To set out the basic principles of the Company's relations with its customers, business partners, governmental authorities (their representatives), competitors, shareholders and employees.

This Code defines and sets out the principles and standards of business ethics that guide the Company and what it expects of its employees in their daily work. The Code applies to all employees of the Company regardless of their position.

For stakeholders, the Code sets out the principles of ethical and responsible business conduct that guide the Company's activities and the behaviour that the Company expects from its stakeholders.

### *I. Relations with employees*

We aim to be an attractive employer for current and future employees, attracting, developing and retaining skilled and motivated people in a professional working environment. We treat all employees with respect and fairness.

#### *1.1 Free choice of work*

We do not tolerate forced, compulsory or involuntary work. Employees are not required to leave a "deposit" or identity documents with their employer and are free to terminate their employment relationship with their employer with reasonable notice. We do not tolerate or contribute to human trafficking.

#### *1.2 Freedom of association and the right to collective bargaining*

We respect the right of workers to join or form a trade union of their choice and to bargain collectively on working conditions.

We undertake not to take any measures that restrict this right of workers and to enable and not to hinder the development of parallel arrangements for independent and free association and bargaining.

We do not discriminate against workers' representatives and allow them to exercise their functions in the workplace.

#### *1.3 Development and qualification*

The Company's organisation creates an environment in which the individual differences and contributions of all its employees are recognised and valued. Every employee has the right to work in an environment that promotes respect for the dignity of each individual.

All employees shall be provided with opportunities for learning, skill development and professional advancement.

The Company shall organise its activities in such a way as to ensure that all employees are provided with equal working conditions, opportunities for professional development, vocational training, retraining, practical work experience, and equal benefits regardless of their sex, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin, or religious belief.

#### *1.4 Health and safety*

We strive to provide a safe, hygienic and non-hazardous working environment by continuously taking adequate steps to prevent damage to health related to the employee's direct work or that may occur during work by minimising the causes of hazards inherent in the working environment.

To enhance safety and health, we involve the employees themselves by providing safety and health training to new and existing employees.

We make sure that employees' working and living quarters are equipped and maintained in accordance with the applicable laws and regulations, and that they meet their basic needs. We care not only for the physical health but also for each other's psychological well-being.

#### *1.5 Child labour*

We do not tolerate the exploitation of children, and children of employees are recruited in accordance with the statutory requirements for the age of employment. Children of employees are recruited to give them the opportunity to become familiar with the company and to link their future with the dairy industry, after expressing their willingness to work, obtaining written parental consent (in accordance with the laws of the Republic of Lithuania), and fulfilling all the requirements set out in the legislation of the Republic of Lithuania.

#### *1.6 Wages and benefits*

Employees shall be paid the agreed salary at the agreed time, which shall not be less than the minimum wage set by the Government and/or the minimum subsistence wage. We do not make any payroll deductions not provided for in the legislation of the Republic of Lithuania.

#### *1.7 Working hours*

We ensure that the hours worked by our employees comply with the provisions of the legislation of the Republic of Lithuania and the mandatory standards relating to working hours and overtime, breaks, rest hours, holidays, including maternity and paternity leave.

#### *1.8 Discrimination*

We do not tolerate discrimination in matters of employment, pay, training, career, labour relations. Opportunities for personal development and career advancement are provided equally to all employees.

We do not discriminate against employees on the grounds of sex, race, nationality, language, origin, social status, religion, belief or opinion, age, sexual orientation, disability, ethnic origin, religion or any other grounds.

#### *1.9 Granting permanent employment*

In all cases of employment of a permanent nature, we shall provide permanent employment based on a formal employment relationship established by the regulations and practices of the legislation of the Republic of Lithuania.

### *1.10 Prevention of rude and inhuman treatment, violence and harassment*

We do not tolerate any humiliation, degradation, insult, mockery, harassment, coaxing, blackmail, manipulation or other coercion of any employee which is contrary to law, conscience or other principles.

We aim to create a working environment in which the worker or a group of workers is not subjected to hostile, unethical, degrading, humiliating, aggressive, abusive, insulting, offensive, or offensive actions that violate the honour and dignity of an individual or a group of workers, or the physical or mental integrity of a person, or are intended to intimidate, embarrass, or disempower an individual or group of workers;

## ***II. Relationships with customers, partners, competitors, other authorities (control authorities, public authorities, various services)***

Our relations with clients, partners, competitors and other institutions are based on respect, honesty, professionalism, mutual trust, fairness, priority of the client's interests, compliance, information and the primacy of negotiation over legal action.

We strive to be a trusted partner in order to achieve long-term partnerships and healthy cooperation.

We strive to build constructive and mutually beneficial relationships.

We select and evaluate suppliers and subcontractors on the basis of predetermined criteria such as quality, price, availability, ability to deliver, reliability, service and corporate responsibility, including social and environmental aspects.

We expect our suppliers and contractors to comply with international standards on human rights, working conditions, the environment and anti-corruption.

We protect the confidential information entrusted to us by our business partners and use it only to the extent agreed with the business partner or required by law.

We do not discuss or collude with competitors on price fixing, market share or other illegal activities.

The company operates in accordance with the laws of the Republic of Lithuania and is open and transparent in its dealings with the authorities. It provides timely and appropriate information to all public authorities in accordance with the law.

Respond in a timely and appropriate manner to all referrals, inquiries and letters received from supervisory and other authorities, exchange information as required and cooperate with supervisory authorities in carrying out inspections or other supervisory functions.

The Company's employees shall do everything possible in the performance of their tasks to prevent any form of corruption.

## ***III. Relations with shareholders***

The Company provides shareholders with transparent and regular information on the Company's financial position and informs them of major changes in its business that may affect the value of its shares. We inform our shareholders and market participants simultaneously and transparently of the most important developments that affect the valuation of the Company.

We ensure that the information provided to the market is accurate and communicated in accordance with relevant legislation and stock exchange rules.

We publish complete, clear and accurate financial statements.

We only report data that is true to reality and information that is based on our knowledge, whether financial or non-financial.

#### ***IV. Public relations***

We aim to be reliable partners and active participants in public life.

We maintain close contacts with the communities in which we operate and develop our projects, and we actively contribute to the social development and well-being of society through cooperation with various organisations. We have a long-term policy of supporting projects that are in line with our ethical standards, values and priorities.

We encourage our employees to volunteer.

We recognise our responsibility to protect human health, the environment and natural resources, and we promote the rational management and use of resources and focus on waste segregation. We aim to reduce waste and CO2 emissions through our activities.

We ensure that our products are safe, authentic, of high quality and meet food safety standards. We continuously improve our food safety, quality and environmental management systems, making them efficient and effective.

#### ***V. Human rights***

The Company respects and promotes international human rights protection in its business activities and ensures the protection of human rights and opposes any violation thereof.

In order to create a positive working environment where everyone's dignity and rights are respected, we act with care to ensure that our activities do not infringe on the rights of others, and uphold our core values of respect for our employees, integrity and openness.

#### ***VI. Anti-corruption***

The Company's business practices are guided by the principles of responsibility, transparency, honesty and reliability.

Business transactions shall be conducted in the best interests of the Company. Neither a natural person nor a legal person having any relationship with an employee may take unfair advantage of the Company by taking advantage of his/her relationship or position.

We avoid situations that may create a conflict between the employee's responsibility towards the company and his/her personal interests. The employee must avoid any circumstances that could damage the Company's reputation or other tangible or intangible interests of the Company.

#### ***VII. Protecting the environment***

The company continuously works to prevent pollution and waste, dedicates resources to this, and seeks the most effective methods to minimise its environmental impact.

The Company uses advanced, energy and resource efficient measures and technologies to reduce the environmental impact of its activities.

Places great emphasis on reducing the consumption of natural resources. The company complies with the requirements of applicable laws and regulations. The quality and environmental management system is continuously improved.

It invests in and develops green energy production, ensures the proper management of waste generated by its operations and reduces greenhouse gas emissions.

When introducing new products, the Company assesses their environmental impact in accordance with the procedures of the Company's system, using materials and technological processes that have the least environmental impact.

### ***VIII. Data protection***

We only process personal data of employees, partners, customers, suppliers and other entities on a lawful basis and for a purpose. The processing is carried out in a manner that ensures privacy, security and confidentiality of the data, and appropriate technical and organisational measures are in place to protect against unauthorised access, disclosure, accidental loss, alteration, destruction or other unauthorised processing. The exchange of knowledge and experience between staff members shall be encouraged within the limits of confidentiality. Disclosure of data to third parties may be made only if required by applicable law or as necessary for the performance of the activity, provided that the recipients of the information are assured of confidentiality.

### ***IX. Monitoring and enforcement of compliance with the Code***

The management of the Company undertakes to comply with the legislation of the Republic of Lithuania, the Company's internal regulations in all areas of social responsibility, to periodically review the relevance and adequacy of this Code in order to improve the changing requirements, and to allocate the necessary resources to implement these provisions, and encourages all employees of the Company to follow a socially responsible policy.

Management undertakes to continuously monitor the implementation of this Code in its day-to-day activities.

We will communicate this Code to all employees and stakeholders (as appropriate) to ensure clarity and understanding of the commitment.

Every employee is required to work in accordance with this Code and is encouraged to report possible breaches of this Code and to provide examples of good practice. Regardless of the method of reporting, all reports made in good faith of possible violations of the Code will be promptly, fairly and thoroughly investigated.

We strive to ensure that our suppliers, partners and their supply chain also implement the ethical conduct provisions.

Violations of the Code of Conduct should be reported to the line manager or through the appropriate channels as set out in the "Procedure for Submitting and Handling Complaints, Suggestions, Inquiries and Requests" BP 10 P002-PS. Violations of the Code of Conduct should also be reported to [socialine.atsakomybe@rokiskio.com](mailto:socialine.atsakomybe@rokiskio.com)

Prepared by:  
Personnel Manager  
Rosita Laužadienė  
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