

CODE OF CONDUCT

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Finèjas UAB (hereinafter referred to as organization) – socially responsible organisation with its activities oriented not only into adherence to effective legal acts but also to setting higher activity targets in daily activities.

The organisation voluntarily includes *social, environmental* and *transparent activity* principles into its internal processes, relations with employees and business partners. The organisation is continuously engaged in creation of safe and healthy working environment.

For these reasons, the organisation is being *developed following the principles of sustainability*, because we care about our future.

We exert efforts to ensure our business partners support our beliefs and values. Integral part of our business is *cooperation with socially responsible companies* that share our beliefs and values.

We encourage our employees and business partners to contribute to better future creation.

All employees of the organisation are responsible for observation of the requirements laid down in this document.

The code of conduct of the organisation is approved by the director's order.

Every employee is familiarised with this Code.

The purpose of the Code is to reveal and established the key values, activity principles and standards of conduct of the organisation.

Values:

- *Transparency and responsiveness*
- *Flexibility and timeliness*
- *Human and environment friendly*

Mission is timely and safe cargo delivery to the destination.

I. BUSINESS PRINCIPLES OF THE ORGANISATION

The Code of Conduct is the commitment and document of the organisation summarising our propagated values and business principles.

Based on the mission, values and policy of the organisation, we realise our social responsibility in following fields: relations with employees, business partners, environmental protection and transparent activity on the market.

II. ADHERENCE TO LAWS

Every employee must have thorough knowledge of legislation regulating his/her job functions.

Superiors must provide their subordinates with necessary clarifications and advice in the field of application of legislation when performing their functions.

III. HUMAN RIGHTS

We undertake an obligation to observe international law: *we recognise* and respect human rights.

The organisation adheres to all legal acts that guarantee equal rights to everyone irrespective of their gender, sexual orientation, race or nationality, disability, age, religion or beliefs.

IV. RESPECT OF EMPLOYEES

We recognise that our business success is determined by all our employees.

Relations with employees are based on long-term cooperation, mutual respect, openness and fulfilment of commitments.

We exert efforts to create favourable working conditions for employees, encourage mutual cooperation and help to each other.

We help to improve and raise qualifications.

We encourage our employees to try themselves in different job positions, allow them to choose the position where their individual capacities are best revealed.

All employees must behave professionally: be correct, polite, follow the rules of communication ethics and refrain from conduct that would cause harm to business reputation of the company.

Responsiveness, polite and tactful communication, avoidance of conflicts, mutual respect are the fundamental principles of co-workers' communication.

Demonstration of negative emotions, raising voice when talking to colleagues or business partners will never be tolerated.

We try to ensure that colleagues are willing to help one another at work, exchange experience and knowledge.

V. BUSINESS POLICY

The organisation speaks clearly against any form of bribery and corruption.

Our goal is that all business transactions are transparent and fair.

When performing job functions, employees are prohibited to offer/promise/give presents (bribes) to third parties (business partners, representatives of the state or municipalities, public institutions and other third parties) and to request for or accept presents (bribes) in pursuit of personal benefits for themselves or the company.

Business lunch and business presents must comply with the general business expenditure policy: small value presents (attributes of the company) aimed at establishing and strengthening relations with clients, organised in good will, adhering to this code.

Business presents are not aimed at direct benefits for the company or making impact on business partners regarding decision-making. All business presents with the presumed value of over EUR 10 must be registered and the head of the Human Resources Division must be informed about any presents of EUR 10 received. Upon making a decision, a present can be accepted or returned to the sender.

We avoid conflict of interests: situations, in which an employee must choose between the interests of the organisation, business partners or his/her own interests.

Pursuit of personal financial interests when performing job functions at the expense of the organisation or business partners is not tolerated in the organisation.

Business transactions are carried out to ensure maximum compliance with the interests of the organisation.

Either natural or legal person may not benefit from the company unfairly, by misusing his/her relations with an employee or his/her office.

Charity activity is carried out in good will, following the principles of this code of conduct and without pursuing personal benefits.

The organisation does not support any political parties, politicians or political campaigns: the resources of the organisation, its logo are not used to give financial support to political campaigns.

Suppliers' selection may not be based on presents received.

Supplier must be chosen according to the optimum offer criteria (ratio between price and quality).

New suppliers are familiarised with our code of conducts and informed that our internal policy prohibits bribery and corruption. When conducting competitions or starting cooperation with new suppliers, every supplier must sign the supplier's declaration of honour.

We guarantee equal provision of the quality of services for all clients, without distinguishing any of them and granting better conditions for him/her.

Corruption is a serious and intolerable breach of legal acts.

VI. EMPLOYEES' APPEARANCE

Office worker must have neat, business-like appearance, observe hygienic requirements, and refrain from distracting the attention of employees around him/her.

Daily business style code of dressing is observed in the organisation. Employee's appearance must show respect to the culture and colleagues of the company.

Proper apparel elements: Polo tea-shirt, smooth texture pullovers, formal blouses, classic trousers or jeans; classic shorts (down to knees or longer), dresses down to knees (or longer), skirts of the same length; not too tight clothes suiting employee's figure; clean, neat footwear; conservative makeup, neat hairdo, neat beard for men.

Improper elements: sharp perfume, too short skirts or dresses, clothes with too low-cut neckline, revealing shoulders, back or waist; see-through clothes; short casual sports shorts; slippers, slip on shoes; torn, brightly decorated jeans; massive jewellery; bright manicure, makeup or its elements.

Employees holding managerial posts, in addition to the above-mentioned requirements, should not wear shorts, clothes with large logos, slogans.

VII. FORCED (HOSTAGE) WORK

The internal policy of the organisation prohibits employment of persons in detention establishments.

Persons willing to cancel the employment contract are allowed to do so considering the agreed term of notice, without applying any penalties, salary reductions.

Employees are not granted loans for which they would be forced to work.

VIII. CHILDREN'S WORK

The organisation does not employ children, we support children's rights to grow and develop healthily, to acquire mandatory education.

According to the laws of the Republic of Lithuania, a person under sixteen is considered a child.

IX. DISCRIMINATION, HARASSMENT, ABUSE

The organisation does not tolerate any form of discrimination, harassment or abuse.

When employing employees or pursuing career, everyone is provided with equal opportunities: no priority is given for certain gender, race, age, disability, nationality, marital status, sexual orientation, beliefs or religion.

Gender harassment is a serious infringement of the person's right to dignity, integrity.

It means that any form of harassment is incompatible with the fundamental values and prohibited in the organisation.

Sexual harassment of colleagues is a serious breach of ethics and work discipline.

We do not tolerate any form of abuse or bullying aimed at intended insult of the other.

Managers are directly responsible for creation and cherish of respectful relations in their groups based on teamwork, cooperation between the units is promoted.

X. FREEDOM OF ASSOCIATIONS, COLLECTIVE NEGOTIATIONS

Freedom of associations and collective negotiations is one of the fundamental human rights.

We respect employees' right to choose to be represented by trade unions in collective negotiations.

Neither employee exercising this right should be discriminated.

XI. QUALITY, RELATIONS WITH BUSINESS PARTNERS

We respect our business partners; we undertake an obligation to act respectfully and fairly without giving grounds to question reliability of cooperation.

Our goal is to develop relations with business partners based on long-term cooperation and mutual benefits.

We provide high quality service: we observe all obligations, ensure safety and accurate delivery of clients' cargoes we transport.

We do not use unfair modes offering our services.

We never trespass the limits of commercial confidentiality.

The organisation can terminate further cooperation with business partners if effective legal acts are breached in their company.

In case of unlawful actions, we inform responsible institutions about any breaches detected or potential without any delay.

We do not maintain contacts with business partners who can damage the reputation of the company.

XII. SAFE AND HEALTHY WORKING ENVIRONMENT

We are creating safe and healthy working environment, ensure safety of work processes.

For this purpose, we prepare safety instructions and carry out employees' training on a continuous basis.

We exert efforts to prevent potential damage.

The organisation creates safe working conditions for every employee, exerts all possible efforts within its control to prevent employee's exposure to stress and to make them feel safe.

Consumption, possession of alcohol, narcotic, psychotropic or other substances with psychic effect at work is prohibited.

Working while being under intoxication with narcotic substances or alcohol is one of the major threats for an accident to happen.

The company exerts preventive measures checking employees' sobriety on a preventive basis.

XIII. ENVIRONMENTAL PROTECTION

Being one of the largest transport organisations in Lithuania, we exert active measures to minimise adverse impact of our business on environment.

Our goal is to ensure that all employees are properly informed and trained on environmental requirements.

We recycle and utilise any produced waste responsibly.

At the same time we promote all employees to use other natural resources (water, electricity) responsibly and to contribute to reduction of produced waste.

The largest impact on environment caused by our organisation is air pollution. Reduction of greenhouse gas (CO₂) emitted by trucks is one of the major goals of the organisation.

We contribute to cleaner environment by buying brand new trucks and teaching drivers of economical driving.

These factors allow us to reduce fuel consumption and emitted CO₂ levels in air on a consistent basis.

XIV. CONFIDENTIALITY, USE OF INFORMATION TECHNOLOGIES

All our employees must prevent illegitimate disclosure of confidential information of the organisation, installation of any software into work computers without the superior's permission is prohibited.

At the same time, we strive for openness, encourage exchange of knowledge and experience without trespassing confidentiality limits.

Use of illegitimate information and storage in IT equipment and data collection media in the premises of the organisation are prohibited. We encourage our employees to use information technologies responsibly (computers, IT networks, mobile phones, email, and internet).

XV. EXAMINATION OF COMPLAINTS, OPINIONS

Employees of the organisation having discovered or suspecting any potential breach of the principles of the code of ethics inside the organisation, business partners' company must inform their immediate and/or higher level superiors without any delay.

We propagate the working environment in which employees would not fear to report any suspected breaches of internal and external laws, legal acts or unethical conduct.

Superiors ensure exertion of all necessary actions to eliminate prohibited actions in accordance with effective legal acts.

If needed, information is forwarded to responsible state institutions (in case of corruption, bribery).

All employees of the organisation, business partners can express their opinions, requests or complaints anonymously, by dropping their letters into the **box of opinions** (available on every floor next to the transport division and garage) or by sending an email to: info@finejas.lt, specifying that information is confidential.

Anonymity is guaranteed.

All suggestions, requests and opinions regarding working conditions can be voiced to the **Health and Safety Committee** in the organisation, by sending an email to gediminas@finejas.lt.
