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Public information

## Supplier Code of Conduct of MAXIMA Group Companies

<b>Purpose</b>	This Supplier Code of Conduct sets forth the minimum standards of conduct that Group Companies expect all their Suppliers to adhere to in order to: (i) implement the highest standards of business ethics in the supply chain, (ii) strengthen sustainable collaboration, (iii) promote legitimate, professional and fair practices that incorporate the objectives of respect for human rights, business ethics and the environmental protection.	
<b>Scope of application</b>	For all Suppliers of the Group Companies.	
<b>Definitions</b>	<b>Code</b>	This Supplier Code of Conduct.
	<b>Company</b>	MAXIMA GRUPĖ, UAB, a company incorporated and operating under the laws of the Republic of Lithuania, legal entity code 301066547.
	<b>MAXIMA Group</b>	Group of companies consisting of the holding Company and all its directly and (or) indirectly controlled subsidiaries.
	<b>Group Company</b>	Any company of MAXIMA Group.
	<b>Regulation<sup>1</sup></b>	Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010.
	<b>Supplier</b>	Any business partner (supplier) of the Group Companies which, in the course of its business, provides services and (or) goods and (or) works to the Group Companies or acts on their behalf (subcontractor).

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<sup>1</sup> More information is available at: [Regulation - 2023/1115 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/legislation/summary/regulation/eu/2023/1115_en.htm)

## 1. General provisions

- 1.1. MAXIMA Group is a large business entity with an important presence in the Baltic region and Central European markets, thus we recognize that not just we, but our Suppliers also shall take the responsibility over their actions, which have an impact on economic growth, social welfare and the quality of the environment.
- 1.2. The Group Companies' goal is to maintain constructive and mutually beneficial relations with the Suppliers. MAXIMA Group operates on the basis of trust and agreements, as well as supports the principle of Supplier diversity, both in establishing new relationships and in cooperating with local companies and businesses.
- 1.3. MAXIMA Group is the participant of the United Nations Global Compact (hereinafter referred to as "the Global Compact")<sup>2</sup>, which is based on principles of human rights, labour, environment and anti-corruption that are relevant to this Code.
- 1.4. The Code was prepared in the light of MAXIMA Group norms of business ethics, applicable legislation, and the values of the Global Compact.
- 1.5. Since the Group Companies follow the principles set out in the below mentioned international documents, **we expect the Suppliers**, to the extent consistent with the size of the entity and the nature of its business, will also carry out their economic activity to ensure the alignment with:
  - 1.5.1. the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct<sup>3</sup>;
  - 1.5.2. the United Nations (UN) Guiding Principles on Business and Human Rights<sup>4</sup>;
  - 1.5.3. the Declaration of the International Labour Organisation (ILO), as well as 8 fundamental conventions of the ILO<sup>5</sup>;
  - 1.5.4. the International Bill of Human Rights<sup>6</sup>.

## 2. Business Ethics

- 2.1. All the Group Companies conduct their activities fairly, transparently, ethically and according to the legal acts. In each country, they operate according to the laws of that country. The Group Companies work to maintain good relations with the supervisory institutions of the countries where they operate, and thus **expect the Suppliers**:
  - 2.1.1. to behave fairly, always seeking to comply with the highest standards of ethics and all relevant legal requirements in their areas of operation, including, but not limited to, corporate governance, the work environment, ethics standards and environmental protection;
  - 2.1.2. to behave ethically and professionally when interacting with the Group Companies and other stakeholders, and to report breaches of the Code standards and risks of such breaches;
  - 2.1.3. when requested, to provide accurate information on their activities and their labour, health and safety, as well as environmental protection practices, without falsifying or hiding facts;
  - 2.1.4. to avoid any type of conflicts of interest and not to participate in activities forbidden by the laws;
  - 2.1.5. to not tolerate bribes or other type of illegal payments, the offer, promise, agreement or acceptance of gifts of any type, hospitality or any other types of illegal benefit, or the promise, agreement, giving or offering, directly or indirectly, of any valuable compensation or of any other benefit whatsoever;
  - 2.1.6. to conduct their business in accordance with the principles of fair competition, and do not engage in any form of prohibited agreements (for example, the sharing or allocation of markets or customers, or price fixing) that restrict fair competition.

## 3. Human Rights

- 3.1. The Group Companies abide by the principle that respect is the foundation of personal and business relationships, and thus **expect the Suppliers**:

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<sup>2</sup> The Global Compact is the world's largest voluntary social responsibility initiative, active since 1999. At the basis of the Global Compact are 10 principles in the areas of human rights, environment, labour and anti-corruption, and the 17 Sustainable Development Goals underpinning the UN's "2030 Agenda for Sustainable Development". More about the Global Compact: [www.unglobalcompact.org](http://www.unglobalcompact.org).

<sup>3</sup> More information is available at: [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | en | OECD](#)

<sup>4</sup> More information is available at: [GuidingPrinciplesBusinessHR\\_EN.pdf \(ohchr.org\)](#)

<sup>5</sup> More information is available at: [The text of the Declaration and its follow-up | International Labour Organization \(ilo.org\)](#) and [Conventions, Protocols and Recommendations | International Labour Organization \(ilo.org\)](#)

<sup>6</sup> More information is available at: [International Bill of Human Rights | OHCHR](#)

- 3.1.1. to respect human rights and comply with all relevant applicable legal acts (including, but not limited to the laws of the country where they operate);
- 3.1.2. to behave fairly, respectfully and justly with their employees;
- 3.1.3. to implement an appropriate human rights due diligence process that is proportionate to the size of the entity, the risk of severe human rights impacts, the nature and context of its operations and is in line with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights. Suppliers shall develop particular due diligence policies and management systems in order to identify applicable human rights violation risks in their companies and in all supply chain and take appropriate steps to mitigate them.

#### **4. Forced and Child Labour, Human Trafficking**

- 4.1. The Group Companies strongly oppose forced and child labour, human trafficking and thus **expect the Suppliers:**
  - 4.1.1. to prohibit forced labour in their operations, including the prison labour, child labour, debt bondage and other forms of compulsory labour, as well as human trafficking;
  - 4.1.2. to hire only those employees who meet the applicable minimum age requirements for such work;
  - 4.1.3. to comply with the legal acts in force on the prohibition of forced and child labour, human trafficking.

#### **5. Remuneration and Working Hours**

- 5.1. The Group Companies duly remunerate for work and achieved results, considering employees' responsibilities and the labour market situation, and provide opportunities for growth. They thus **expect the Suppliers:**
  - 5.1.1. to determine working hours, remuneration and overtime policy in compliance with all applicable legal acts in force;
  - 5.1.2. to pay all employees the agreed remuneration, which shall not be less than the minimum remuneration as defined in the applicable legislation, on time.

#### **6. Working Conditions**

- 6.1. The Group Companies seek to create a safe and healthy work environment, to provide employees with equal opportunities for growth, strive for good performance, and participate continuously in the achievement of common goals, and thus **expect the Suppliers:**
  - 6.1.1. to create a safe and healthy work environment for their employees;
  - 6.1.2. to comply with all applicable legal acts in force relating to the provision of adequate working conditions;
  - 6.1.3. to prohibit involvement in situations where there may be a threat of physical or psychological violence, verbal or psychological harassment and (or) sexual exploitation and abuse.

#### **7. Freedom of Associations and Collective Bargaining**

- 7.1. The Group Companies **expect the Suppliers:**
  - 7.1.1. to recognize the employees' right to freely join together with others in associations, trade unions or similar employees' representative organisations, form, establish and (or) join (or refrain from joining) organisations of their choice and participate in collective bargaining, and, after exercising such rights, employees are not subject to any form of discrimination, persecution, punishment or other forms of harassment;
  - 7.1.2. to ensure that employees have the possibility to report grievances in the workplace.

#### **8. Occupational Health and Safety**

- 8.1. The Group Companies provide and continuously improve safe and healthy conditions in the workplace, as well as ensure the safety of work processes and implement preventive measures, and thus **expect the Suppliers:**
  - 8.1.1. to comply with all related applicable legislation, including occupational safety and health requirements of the employees;
  - 8.1.2. to give importance to the occupational health and safety of employees in all their operations;
  - 8.1.3. to take suitable measures for the prevention of occupational illnesses and work-related accidents and to provide employees with a safe and healthy workplace.

## 9. Equal Opportunities and Diversity

- 9.1. The Group Companies do not tolerate discrimination, humiliation, harassment, violence or insults against employees or other persons. The Group Companies' employees treat the Suppliers respectfully and with dignity, and thus **expect the Suppliers**:
- 9.1.1. to create and maintain the environment where all employees are treated with dignity and respect;
  - 9.1.2. in hiring and throughout employment, not to discriminate any employee on the basis of personal identity characteristics related to gender, gender identity, race, colour, nationality, language, origin, marital or social status, age, sexual orientation, (dis)ability, ethnicity, membership in a political party, trade union or associations, religion, faith, beliefs or views (including, but not limited, to political), intention to have a child (children) or other non-job-related characteristic;
  - 9.1.3. to forbid any physical, sexual, psychological or verbal harassment or violence against employees.

## 10. Environmental Protection

- 10.1. The Group Companies conduct their day-to-day operations in compliance with environmental protection legislation and permits. They encourage the Suppliers to reduce their environmental impact, and thus **expect the Suppliers**:
- 10.1.1. to comply with environmental protection laws, rules, standards and permits in force;
  - 10.1.2. to take responsibility for the environmental impact of their operations;
  - 10.1.3. to install and use environmentally friendly technologies and to develop environmentally responsible business practices.
- 10.2. The Group Companies **expect the Suppliers** to reduce their environmental impact (their greenhouse gas emissions) by setting science-based targets by the end of 2026. These targets shall be consistent with the Paris Agreement to reduce greenhouse gas emissions and limit the global average temperature increase to no more than 1.5°C above pre-industrial levels. Agreements with the certain Suppliers may establish specific undertakings.

## 11. Continuous Improvement

- 11.1. The provisions of this Code set out the minimum standards **expected of the Suppliers**. The role of the Supplier begins but does not end with compliance with this Code. Thus, the Group Companies **expect**:
- 11.1.1. that if any circumstances arise that risk non-compliance with the standards and principles set out in the Code, the Supplier is responsible for open and timely communication with the relevant Group Company;
  - 11.1.2. that Suppliers, while working with their own suppliers and subcontractors, seek to ensure that they also comply with the principles of this Code;
  - 11.1.3. that Suppliers continuously improve their practices in line with the highest standards of business ethics.

## 12. Sustainable Supply Chain

- 12.1. Among other obligations for supply chains stipulated in this Code the Group Companies **expect the Suppliers** supplying them with the relevant commodities and/or relevant products referred to in the Regulation (hereinafter collectively referred to as the "Products") will ensure that:
- 12.1.1. the Products comply with all the requirements set out in the Regulation; and
  - 12.1.2. the Products have been subject to due diligence in accordance with the provisions of the Regulation and the conclusion of such due diligence is that the Products comply with all the requirements of the Regulation; and
  - 12.1.3. the relevant Group Company will be granted with a right to verify in detail, in accordance with the Regulation: the compliance of the Products with the requirements of the Regulation; and (or) the process of the Supplier's due diligence in ensuring the compliance of the Products with the requirements of the Regulation.

## 13. Monitoring Compliance with the Code and Final Provisions

- 13.1. The Supplier shall be responsible for the continuous and uninterrupted compliance of its business operations with the provisions of this Code. When engaging a subcontractor, the Supplier shall seek that the subcontractor also complies with the provisions of this Code.

- 13.2. In order to have business relations only with those Suppliers that comply with the provisions of this Code, Group Companies may, in accordance with the procedures established by the Group Companies' internal regulations, carry out procedures on assessment or inspection of the Supplier: to inspect the Suppliers using commercially available software, to request the Suppliers' information and necessary explanations (including documentation and data confirming Suppliers' implementation of this Code), and to initiate visits to the Supplier's premises and (or) places of business.
- 13.3. Non-compliance with the Code, refusal, evasion or delay by the Supplier to provide information or explanations, provision of false information, or obstruction of the Group Companies in carrying out an inspection of the Supplier's compliance with the provisions of this Code, as well as denying physical access to the Supplier's premises and (or) places of business to representatives of the Group Companies, or failing to remedy any non-compliance identified, may be considered as a material breach of this Code. The Group Companies reserve the right to assess the consequences of such Supplier's behaviour for further cooperation, taking into consideration the nature and extent of breach made by the Supplier.
- 13.4. Suppliers are encouraged to report suspected, possible (if there is a risk) or actual breaches of the provisions of this Code, or in the event of facing difficulties in rectifying identified non-compliance with the provisions of the Code, fairly and in a good faith to the contact person of the Group Company identified in the agreement or to the trust line stipulated in the publicly available Corruption Prevention Policy of the relevant Group Company.
- 13.5. The Owner of the Code in the Company is the Legal and Sustainability unit that is responsible for the proper implementation of the Code's provisions within the Company, initiating the review of the Code, and submitting the updated Code for approval to the competent body.