

UAB "HEGELMANN TRANSPORTE", 300022163

ANTI-CORRUPTION POLICY

I. TERMS AND CONDITIONS

1. UAB "Hegelmann Transporte" anti-corruption policy (further in the text policy) defines and describes general corruption standards in the company UAB "Hegelmann Transporte" (further in the text company) and defines the most important guidelines for the implementation of this policy.

2. The company undertakes to adhere to the highest standards of business conduct. We act responsibly, we strive to provide fair services that ensure open competition and ethical conditions, in accordance with the norms of the legal system of the country in which we operate.

3. **Company's anti-corruption position.** The company clearly combats all forms of bribery and corruption. The company does not tolerate any form of corruption, either directly or indirectly, and no corrupt acts. We do not pay, do not offer, and prohibit bribes or other valuable consideration in order to win or retain a company, or to promote a decision or compensation. We avoid all situations that speak against or can speak against our professional responsibilities.

4. The policy applies to all company employees (including people who negotiate on behalf of the company, regardless of the form of the relationship with the company concerned and the remuneration) and, insofar as it is coordinated with the provisions of the policy, to third parties (suppliers, Contractors, business partners, etc.).

5. Definitions:

5.1. **Corruption** - An act or inactivity that: a) directly or indirectly exercises property or other personal benefits (gifts, services, promises, privileges) on yourself or another person for the performance or non-fulfilment of your duties, or b) directly or indirectly proposes to grant a person personal or other personal advantages for the fulfilment or non-fulfilment of their duties, (c) mediation in the acts mentioned under letters a and b.

5.2. **Private interests** - the company's employees or their dependents' personal belongings of individuals or immaterial interests that could influence their decisions.



TAPA
Transport Asset Protection Association

FSSC 22000

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Agronomijos g. 55,
LT-47480 Kaunas, Lietuva

Transporto skyrius:
UAB Hegelmann Transporte
Pramonės pr. 13,
LT-51327 Kaunas, Lietuva

5.3. **Third parties** - private and legal persons who are not employees of the company.

II. ROLES AND RESPONSIBILITIES

6. The employees of the company are responsible for adhering to the policy and are asked to state the problems and to follow the examples of good practice.

7. It is the responsibility of each direct leader to ensure that each team member has the opportunity to become familiar with the policies and key anti-corruption principles. He is also responsible for ensuring that the appropriate measures and internal control measures are implemented to prevent bribery and corruption.

8. Daily consolidation of this policy, providing regular information and training on anti-corruption issues and monitoring compliance with this policy is part of responsibility of the direct manager.

9. Bribery

9.1. The company does not tolerate any bribery forms.

9.2. Bribery is the receipt, offering, or promise of property or other personal benefit to yourself or another person to influence actions or decisions, promote inappropriate performance, or abuse of the person's position. Bribery can take many forms, including, but not limited to, transferring cash, valuable gifts, travel, lodging, career opportunities, and / or providing valuable, commercially relevant information, etc.

9.3. Company employees must not, directly or indirectly, accept, offer, receive or promise a bribe, including from third parties.

10. Conflict of interest

10.1. Conflict of interest is considered to be a situation in which a company's employee makes decisions, participates in them, or takes other actions contrary to the company's interests when performing his or her duties.

10.2. Employees must avoid situations in which their private interests may be in the interests of the company. The company takes all legal control measures and expects employees to make appropriate and sensible decisions in their tasks - in all cases, they will not make a personal profit.

10.3. The Company does not tolerate activities by employees that are in the interests of the Company from a competitive point of view and does not expect that persons who are employed by companies to engage in any other activities of the Company in competition with the Society



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or otherwise in connection with their activities by companies, organizations or institutions (not permitted without the written consent of one's own company ("UAB Hegelmann Transporte")) and do not use the company's assets for non-fulfilment functions and / or do not otherwise infringe the legitimate interests of the company.

10.4. In the event of a conflict of interest and / or suspicion that such a conflict may arise, the employee must immediately inform his or her line manager or the person authorized by him and refrain from discussing problems and accepting decisions in connection with a clear conflict of interest.

11. Misuse of duties

11.1. The company does not tolerate employee abuse of authority with regard to assigned powers of attorney through internal documentation.

11.2. The work equipment, financial and material resources provided by the company are used only in accordance with the procedure specified in the company's internal regulations and other documents. Company employees must protect, if necessary, take actions to prevent the unlawful use of property, damage or any other illegal activity.

12. Business agreements facilitating payments

12.1. Payments facilitating business agreements are payments to civil servants with the aim of implementing the usual procedure or being implemented in a shorter time.

12.2. All employees are prohibited from making or accepting payments that facilitate business agreements.

13. Gifts and hospitality

13.1. A gift is understood to mean all property or property rights transferred free of charge.

13.2. Company employees may not tolerate or accept gifts that may result in a conflict of interest or that go beyond normal business practice and assume that this is an attempt to attract company employees and decisions in the performance of their duties to influence the employee.

13.3. The Company prohibits offering gifts of any kind, if they are given, in an unjustified manner to ensure the benefit or bias of the recipient's decisions regarding the Company.

13.4. Company employees can accept and offer official promotional gifts (e.g. souvenirs), gifts for presentations and gifts in accordance with international business protocols or traditions and the proposed business hospitality (e.g. business lunches, official dinners, exhibitions, conferences, etc.) assume, if such gifts / demonstrable entertainment are suitable to maintain

the business relationship, have clearly expressed the goal of maintaining business relationships, to strengthen the services of the company, brand awareness and the image of the company.

13.5. Regardless of the amount, the money may not be accepted or given as a gift.

13.6. When company employees attend events of other business partners, customers, etc., their business travel related expenses and other expenses are determined in accordance with the requirements of the company's internal laws and other documents that govern the business trips of costs, their release, expenses for the payment of business travel expenses and the costs of business trips. Under objective circumstances, such as when an employee is invited to non-profit events, and where part of the business travel expenses are borne by the inviting party in accordance with normal business practice, expenses related to (acceptable under the law), or part of, business trips may be incurred not only be paid by the company.

13.7. In all cases, employees, in the form of business gifts or other values offered to them, must follow the principle of reasonableness and assess whether they should unduly influence the benefits of such gifts or other types of work beyond the normal practice of fair business relationships.

14. Support and other benefits

14.1. The support of private and / or legal persons (companies, institutions, organizations) with beneficiary status is provided in accordance with the company's internal procedures. In all cases, the granting of support is coordinated with the company's management.

14.2. The company supports social, educational, artistic, cultural, scientific, sporting activities and projects. The company wants to ensure that its support reaches those target groups whose activities and initiatives are important with the corporate values, the guidelines for social responsibility, strategy and (or) and emphasize and promote important things for the state.

14.3. Support cannot be used as a covert measure for bribery and / or trade.

14.4. The company waives all forms of political party support: support is not granted and cannot be used to fund political parties or political election campaigns.

15. Trade with influence

15.1. The company does not tolerate trade in influence forms.

15.2. Trading with influence is understood as an illegal act by the employee of the company in the exercise of its duties, powers, kinship and / or knowledge in the work environment or any



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other probable influence in order to influence other employees, other companies, institutions or organizations in order to be lawful or illegal to act (or vice versa - do not act).

16. Transparent procurement

16.1. The company demands that all procurements are transparent.

16.2. Whole activity related to procurement should follow internal procedure (Procurement Procedure) that describes the main criteria of the supplier selection.

16.3. Suppliers must be selected on the basis of the economically most advantageous offer or the lowest price criterion under equal and non-discriminatory conditions for suppliers, both when placing the order and when executing it.

16.4. In all cases, the company takes immediate action if, with the help of internal control mechanisms and other measures, it is established that the behaviour of the representatives of third parties who supply the company with goods, services or works violates the company's anti-corruption and procurement procedures.

III. POLICY IMPLEMENTATION

17. The company has approved this policy so that all employees adhere to the principles and standards set out therein. In the event of a violation of the regulations, employees can be punished for the statutory penalties, including dismissal.

18. Every employee of the company who suspects violations of these regulations must immediately and properly react to all violations of these regulations and inform the managing director of the company. For all applicants, the company gives a clear and unambiguous guarantee of complete confidentiality, data protection and confidentiality.

Approved by: CEO Tomas Jurgelevičius

Date valid from: 2022-01-03



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