

CORRUPTION PREVENTION POLICY OF UAB LITESKO

I. PURPOSE AND SCOPE

- 1.1. All internal and external relations of UAB Litesko (the “Company”) are guided by applicable laws. The Company maintains high ethical standards in everything it does, respects the rights of employees and the principle of fairness towards customers, contractors, suppliers and other external partners.
- 1.2. The Corruption Prevention Policy (the “Policy”) is part of the Company’s Compliance Policy which sets out the key principles and requirements for the prevention of corruption and zero tolerance of all forms of bribery and corruption in all areas of the Company’s business with the aim of creating and conducting its business in a transparent environment. The Policy is detailed and to be applied in conjunction with the Anti-Corruption Code of Conduct of the Veolia Group and other internal procedures of the Company.
- 1.3. The Policy is consistent with and upholds the values of the Veolia Group and is in line with the Code of Ethics of the Veolia Group, the Anti-Corruption Code of Conduct, the Company’s internal documents and other legal procedures of the Veolia Group.
- 1.4. Where the Policy, laws or other external or internal legal acts do not provide for appropriate standards of conduct, the Company conducts itself in a manner consistent with the highest standards of trustworthiness, integrity and transparency accepted by the public.
- 1.5. The Policy applies to all employees of the Company, regardless of their position, type of employment contract, as well as to members of the management bodies, persons acting under other civil contracts, retained consultants, intermediaries and other persons acting on behalf of the Company, regardless of the form of the relationship and/or remuneration.
- 1.6. The Company aims to ensure that the Policy is complied with by all of its business partners, suppliers and other third parties dealing with the Company.
- 1.7. In order to implement a “zero tolerance to corruption” strategy for any manifestations of corrupt behaviour in its relations with both internal and external stakeholders, the Company is putting in place (has put in place) the ISO 37001:2016 anti-corruption management system and is committed to fulfilling the requirements of this system.
- 1.8. The senior management of the Company, together with all management personnel and all employees, are involved in creating a culture of integrity, transparency, openness and compliance. To this end, the Company undertakes to continuously monitor, evaluate, develop and improve its anti-corruption management system and to regularly (at least annually) conduct or review its existing corruption risk assessment which forms the basis for the implementation of the relevant corruption risk monitoring measures.
- 1.9. For the sake of clarity, job titles and other concepts as generalized titles in the Policy are used in the masculine gender as provided for in the grammar of the Lithuanian language, but in no way belong to and/or encourage any discrimination and/or gender inequality in the Company.

II. UNDERLYING PRINCIPLES AND ANTI-CORRUPTION COMMITMENTS

2.1. Zero tolerance of corruption:

- 2.1.1. The business of the Company is guided by a zero-tolerance approach to corruption, i.e. corruption is not tolerated in any form, including, but not limited to, forms such as bribery, kickbacks, trading in influence, facilitation payments or any other acts where the commission of such acts is aimed at soliciting or demanding bribes, kickbacks, trading in influence, facilitation payment or covering up acts of corrupt nature. This approach applies to relationships with both the public and the private sector.
- 2.1.2. The Company strictly prohibits any corrupt conduct towards public figures, businesses and individuals as well as any other activity that could be interpreted as such, in particular influencing. The Company prohibits any attempts to benefit from third parties in exchange for illegal services, whether promised, provided or implied.
- 2.1.3. The Company's business partners, suppliers and other third parties dealing with the Company must also act in accordance with the principles of ethical and responsible business and comply with the anti-corruption provisions of applicable legislation.
- 2.1.4. All employees, regardless of their position or nature of their employment relationship, must resist the solicitation of any form of corrupt activity, i.e. employees should decline requests for bribes or other rewards from a civil servant or any third party (supplier, partner, consultant, etc.) or any other attempt to obtain an undue reward.

2.2. Disclosure and transparent accounting:

- 2.2.1. The Company's books and records must be accurate and present fairly all economic transactions and events in strict compliance with all laws and financial accounting standards.
- 2.2.2. The records and maintenance of the Company's documents must be accurate and fair and carried out in strict compliance with all applicable legal acts. The Company does not tolerate and prohibits the destruction, damage, distortion or any other modification of original documents that is not in accordance with the legal acts.

2.3. Avoidance of conflicts of interest:

- 2.3.1. All employees must carry out their duties in good faith and not use their position for their personal benefit or that of their relatives.
- 2.3.2. If an employee is confronted with a situation which may give rise to a conflict of interest or if he or she becomes aware of a potential conflict of interest in the activities of other employees, he or she must report this in accordance with the Company's internal procedure.
- 2.3.3. The Company's working tools, financial and material resources, internal and confidential information can be used only for the performance of the direct duties of Employees, except as otherwise permitted by the Company.
- 2.3.4. The Company prohibits nepotism (favouring and patronising of one's family members, relatives and other close persons (including cohabitants, partners) using one's position, name and power) and cronyism (favouring and patronising of one's friends and buddies using one's position, name and power).

- 2.3.5. Other activities of the Employee that give rise to a conflict of interest with the Company are not acceptable to the Company.
- 2.3.6. Lobbying by employees of the Company is permitted in accordance with applicable laws and only if such activities do not give rise to a conflict of interest between the Employee and the Company or perceived conflict of interest. In all cases, an Employee who decides to engage in lobbying must notify the Company.
- 2.3.7. Employees participate and may participate in activities other than their employment with the Company (e.g., in associations, political parties or political activities, volunteering, etc.) only on their own behalf and not on behalf of the Company, unless the Company permits and/or authorises the Employee to participate in such additional activities on behalf of the Company.

2.4. Incentive or facilitation payments and extortion payments:

- 2.4.1. Payments for various transactions are limited to those and only those that are officially accepted and approved and that are applicable to all suppliers, partners or other entities for the same service and that are officially known and disclosed.
- 2.4.2. No other incentive payments or payments that facilitate and/or expedite a business transaction or operation that are not considered as legitimate and official payments are allowed.
- 2.4.3. In exceptional and extraordinary situations where there is a real threat of violence or personal harm, an employee may be forced to violate the provisions of this Policy. In cases where extortion is carried out under the threat of violence or personal harm, the health, safety and freedom of the Company's employee is the overriding factor in making a decision in such a situation. In such situations, corrective action will be taken in accordance with the legal acts and the principles of the Policy.
- 2.4.4. In the situation referred to in paragraph 2.4.3, an employee who has made a payment in order to avoid the risk of violence or personal harm must notify his or her line manager and the Compliance Officer as soon as possible.
- 2.4.5. In the event of a payment under paragraph 2.4.3, the Company must properly record such payment in its accounts and the Compliance Officer must take steps to investigate the event. If required by law, such payment must be reported to the relevant authorities.

2.5. Sponsorship, advantages and support for political parties

- 2.5.1. The Company does not sponsor, fund, or provide support to politicians, political parties/movements, their representatives or their candidates, election campaigns or other political organisations.
- 2.5.2. The Company sponsors only in accordance with the legal acts governing sponsorship, sponsorship procedures put in place within the Veolia Group and internal procedure of the Company.
- 2.5.3. Sponsorship must be granted in a transparent and legal manner. Sponsorship may not be granted for any purpose other than gratuitously (with the exception of cases provided for by law in respect of certain permissible obligations of the beneficiaries, such as advertising, etc.) to sponsor the activities and initiatives of the beneficiaries, to promote educational, social, cultural, community and other activities that are consistent with the legal acts and values of the Company and the Group.

- 2.5.4. Sponsorship must be accurately reflected in the financial records of the Company. Sponsorship may not be granted for purposes other than those set out in paragraph 2.5.3 such as payment for services or goods supplied, funding of political parties and/or campaigns, incentive or facilitation payments, donations and other consideration that would be of a kind that could be classified as an illegal (corrupt) payment or inaccurate (fraudulent) record keeping.

2.6. Gifts, hospitality and entertainment

- 2.6.1. The Company and its employees may only give and accept gifts, hospitality or entertainment in accordance with the rules adopted by the Company and Veolia Group. In any event, the Company's employees and representatives may only accept such gifts and hospitality provided that they do not exceed the limits set and are open, reasonable and appropriate to the nature of the business relationship.
- 2.6.2. No gift, hospitality or entertainment, regardless of their value or the Company's permissible limit, may be accepted if such acceptance would be granted in return for or in consideration of a business decision or if such gift or hospitality could be understood as affecting a business decision, patronising or creating a one-for-one exchange relationship.
- 2.6.3. Gifts, however small in value (as defined in the Company's Gift Policy) which are of a regular nature are considered gifts which an Employee cannot accept.
- 2.6.4. Employees of the Company must strictly comply with the requirements on providing gifts and hospitality to officials of the French Republic (and their entourage) as set out in the Company's Gift Policy.

2.7. Employee education

- 2.7.1. Employees receive anti-corruption education, awareness and training with the aim of raising their anti-corruption awareness and promoting anti-corruption practices. Employees may be educated in certain groups, depending on which positions and job functions are relevant to anti-corruption (e.g. procurement, commercial specialists). Training may be organised either by the Company itself or by the Veolia Group.
- 2.7.2. Training is mandatory for all employees who are included in the relevant training list.

2.8. Suppliers

- 2.8.1. Suppliers are selected on the basis of objective criteria and through procurement based on transparency, competition and objective decision-making.
- 2.8.2. The Company ensures that the procurement procedures and contract awards are guided by the principles of equality, non-discrimination, mutual recognition and transparency. The Company will not enter into contracts with suppliers if it transpires that they have a conviction for criminal offences of a corrupt nature which has not yet expired.

2.9. Bonuses

- 2.9.1. The Company's incentive/bonus system should not encourage Employees to commit corrupt or fraudulent acts. The fixed part of remuneration payable by the Company should (subject to certain exceptions and subject to control and supervision) be higher than the variable part (performance-related) of remuneration.

III. POLICY IMPLEMENTATION, MONITORING AND CONTROL

- 3.1.1. Members of the Company's management bodies, the CEO and heads of structural units shall, by their conduct, shape the standard of conduct set out in the Policy and ensure that the activities in the areas of their responsibility are carried out in accordance with the provisions of this Policy.
- 3.1.2. Heads of structural units of the Company are responsible for ensuring that this Policy and the internal documents implementing it are communicated to all subordinate employees and that subordinate employees take part in the relevant training.
- 3.1.3. This Policy is implemented in conjunction with the Code of Ethics of the Veolia Group, the Anti-Corruption Code of Conduct and the relevant Veolia Group legal procedures and/or internal procedures of the Company implementing them. The Company aims to ensure that this Policy and the Anti-Corruption Code of Conduct are complied with by all its suppliers, contractors, subcontractors, consultants, intermediaries, beneficiaries, business partners and others. The Policy and the Anti-Corruption Code of Conduct shall be made publicly available.
- 3.1.4. If employees have questions regarding the provisions of this Policy or other implementing internal legal acts or their implementation, they are encouraged to contact the Compliance Officer of the Company, their line managers or the Company's legal experts.
- 3.1.5. Employees who become aware of violations of this Policy are encouraged to report such violations either directly to the Compliance Officer or through the communication channels established by the Company.
- 3.1.6. Employees of the Company who report potential violations must act in good faith and on reasonable belief that a violation of the Policy has occurred, i.e. if the employee believes in good faith that the information is accurate under the circumstances of the situation.
- 3.1.7. The Company ensures that each report is properly scrutinised and clarified, and the internal investigation process guarantees the anonymity or confidentiality of the informant and a fair and objective assessment of the case. In any event, each violation is assessed first and foremost on the assumption that the employee made the report in good faith.
- 3.1.8. The Company may not retaliate against the employee who has reported a violation in accordance with the rules laid down in the relevant internal regulations.
- 3.1.9. Following the assessment of the report (even if the report is not considered to be a violation of this Policy after investigation), the Compliance Officer of the Company may take appropriate corrective measures to reduce the likelihood of risks, improve the anti-corruption management system at the Company, arrange for additional employee education, etc.
- 3.1.10. A violation of the rules set out in this Policy or other internal documents of Veolia may be a reason for legal or disciplinary action, including termination of the contract with the Company.
- 3.1.11. The imposition of disciplinary or legal penalties does not prevent the Company from pursuing claims for damages, including recourse claims, in respect of financial losses or reputational damage to the Company.
- 3.1.12. This Policy and any amendments thereto are subject to approval of the Board. Other internal documents of the Company implementing the Policy (unless otherwise provided) are approved by the CEO of the Company.

IV. POLICY FRAMEWORK

4.1. Key documents implementing and/or relating to the Policy:

- 4.1.1. Company's Compliance Policy;
 - 4.1.2. Veolia Ethics Guide;
 - 4.1.3. Veolia Anti-Corruption Code of Conduct;
 - 4.1.4. Company's Internal Labor Rules;
 - 4.1.5. The Company's gift policy or other internal legal act of the Company, establishing the procedure for giving and/or receiving gifts;
 - 4.1.6. Company's Sponsorship Procedure and Veolia Key Legal Procedure No 10;
 - 4.1.7. Veolia Key Legal Procedure No 16;
 - 4.1.8. The procedure for implementing the company's internal whistleblowing channel and investigation of whistleblowing reports;
 - 4.1.9. Other internal documents of the Company and/or legal procedures of the Veolia Group.
-