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BUSINESS CODE OF ETHICS

1. The business of Green Genius International B.V. and its directly and indirectly controlled entities (hereinafter collectively or individually referred to as the Group or Group companies) are based on transparency, integrity and ethical business standards. The Group believes that responsible and transparent behaviour serves the best interest not only the Group, but also all the Group's stakeholders.
2. The Group adheres to international standards on human rights, working conditions, the environment and anti-corruption, including the Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises (MNEs), the Guiding Principles of the United Nations (UN) on Business and Human Rights, the Principles of the 8 Conventions of the International Labour Organisation's (ILO's) Declaration on Fundamental Principles and Rights at Work, the Principles and Rights enshrined in the International Charter of Human Rights and the principles of the UN Global Compact. These international standards form the basis for this Business Code of Ethics (hereinafter referred to as the **Code**) and other policies and rules.
3. The Code sets out the principles, values and ethical standards that Group companies are guided by in the conduct of their business and the expectations they have of their employees, members of their management and supervisory bodies, irrespective of their position, the company or the country in which they work, as well as the Group's partners.
4. The Code shall apply to all employees of the Group (including persons acting on behalf of the Group companies under civil contracts (including employees, consultants) who may influence the rights and obligations of the Group companies) in their relationships within the Group or with third parties, irrespective of the position they hold or the role they play.
5. The Group expects and strives to ensure that the principles set out in the Code are shared by its business partners.

Respect for Human Rights

6. The Group respects and guarantees human rights and freedoms and respectful and dignified relations with all stakeholders, is guided by democratic values, and complies with the human rights requirements of the above-mentioned international conventions and agreements as well as national legislation.
7. The Group aims to ensure that:
 - (a) The Group's activities would not violate human rights and freedoms. When a risk of violation arises, the Group will seek to address any negative consequences of violations of human rights and freedoms and to ensure that they do not happen again;
 - (b) The Group's activities would not have a negative impact on human rights. In the event of such a risk, the Group will take measures to address the adverse effects;
 - (c) The Group seeks ways to avoid adverse impacts on human rights and freedoms that are directly related to the Group's activities, goods or services as a result of a business relationship, even if the Group is not contributing to such adverse impacts through its actions.

Work and Employee Relations

8. The Group complies with all requirements relating to working conditions and employee relations, including, but not limited to, the age requirements set out in the above-mentioned international agreements and conventions as well as national legislation. All employees are treated equally and fairly. The aim is to create a working environment where employees feel valued and

respected, regardless of their individual differences, abilities or personal qualities, and where their work is evaluated based on performance and values.

9. The Group promotes diversity among its employees and does not tolerate any form of discrimination, including, but not limited to, bullying, humiliation, harassment, violence (including psychological violence), or insulting behaviour towards employees or any other person encountered in the course of its activities on the grounds of their age, race, skin colour, gender, language, religion, political or other opinion, national or social origin, economic or other status, disability, nationality, sexual orientation, marital or family status.
10. The Group respects the right of collective representation of employees and encourages consultation and cooperation between employers, workers and their representatives on issues of mutual concern.
11. Employees are remunerated for the work performed fairly and transparently. Fair pay is guaranteed, which depends on the functions performed, the quality of the work, and professional and subject-related ability, and is the same for the same or work of equal value.
12. The Group creates and continuously improves a safe and healthy working environment by ensuring the safety of work processes, preventing potential harm and responding to unhealthy conditions, and by supporting measures to promote health and well-being.
13. The Group promotes a responsible attitude among its employees towards internal and external policies, respect for the environment, safety and health.
14. The Group respects its employees and feels responsible for them. Everyone is asked to do the same: respect for each other and responsibility.
15. The Group carries out its duties responsibly and is ready to cooperate and help others. It regularly shares its experience and expertise, provides advice and, where necessary, asks for help itself. When a mistake is made, the situation and the process are analysed, instead of blaming, in order to find the cause of the mistake and to make sure it does not happen again. Mistakes are discussed so that others may learn from them.

Environmental protection

16. At Group's activities a significant emphasis is placed on reducing environmental impacts and developing environmentally friendly solutions.
17. The Group conducts its day-to-day operations in compliance with all environmental laws, has all the necessary permits to operate and is committed to improving the environmental performance of the Group's businesses.
18. The Group complies with statutory transparency requirements when providing information on the environmental impact of the Group's activities.
19. Before making an investment decision, the Group assesses and takes into account the foreseeable potential environmental, health and safety impacts associated with the economic activities in which it invests. The aim is to avoid or, where this is not possible, reduce negative impacts.
20. The Group's resources are protected and used in a sustainable way, by protecting them and sharing them with each other.
21. The Group promotes a higher level of environmental awareness with partners and customers, encourages the use of environmentally friendly products and educates about the environmental impact of activities.
22. The Group aims to contribute to the development of technological progress, both within the Group and in the country, and to participate in sustainable initiatives and programmes to protect the environment.

Fight Against Corruption

23. The Group conducts its business honestly, fairly and with due professionalism. The Group does not tolerate any form of corruption including, but not limited to, bribery, graft, influence peddling, money laundering, abuse of office in the Group's activities, and has adopted a binding Anti-Corruption Policy and complies with the obligations set out therein.

24. Employees of the Group and members of the management and supervisory bodies are prohibited from offering, promising, soliciting, demanding or accepting unnecessary gratuities or other benefits from public officials or from the employees of, or persons related to, business partners. The Group does not use third parties to transfer unnecessary monetary consideration or other benefits.
25. The investment decision-making process also assesses corruption risks on a case-by-case basis for each potential investment.
26. Group employees are encouraged to take an interest in and comply with the Group's internal policies, procedures and the Code.
27. The Group does not endorse or otherwise assist political parties or other political organisations or individual candidates for public office.
28. The Group only accepts and donates representative and/or low-value symbolic gifts and hospitality consistent with normal business or international practice. Gifts, services, entertainment, hospitality and other benefits shall not be accepted or provided from suppliers in procurement processes.
29. The Group is committed to zero tolerance of corruption.

Taxation

30. The Group complies with all applicable tax laws and strives to ensure that its obligations to the State are met in a transparent, accountable and timely manner.
31. The Group and its companies do not tolerate or use any tax avoidance schemes and do not work with partners who use such schemes in their business.

Fair Competition

32. The Group complies with all applicable competition laws and related regulations and does not enter into anti-competitive agreements. It also does not engage in or tolerate conduct (agreements with competitors, illegal restrictions on the activities of customers or suppliers, illegal disclosure or exchange of confidential and commercially significant information, manipulation of trade orders, transactions or information, abuse of a dominant or exclusive position) which threaten fair competition or may cause damage to customers.
33. The Group respects its competitors and uses only fair and ethical methods of competition.

Avoidance of Conflicts of Interest

34. The Group follows the principle that the personal activities and interests of employees of Group companies must not interfere with the Group's objective of ensuring the legality and continuity of its activities. Employees of the Group must avoid any contact or activity that is contrary to the legitimate interests of the Group, its controlled entities and their investors, if any, or that calls into question the loyalty of employees.
35. All employees of Group companies are required to comply with an approved conflict of interest management policy in the performance of their duties.
36. In all business relationships, employees must act impartially, not provide impermissible benefits to other business entities, not get involved in situations that cause or may potentially cause a conflict of interest, have a negative impact on the freedom of their own actions or decisions related to the performance of work functions.

Investor and Customer Relations

37. Honest, professional relations are maintained with all investors, partners and customers of Group companies. The needs and comments of such persons are taken into account.
38. It is ensured that the services provided comply with all legally binding requirements applicable to the activities of the relevant Group companies.

39. Customers are provided with accurate, verifiable, timely and clear information, and customers are educated with all possible information about the business, services, sustainability and objectives.
40. The Group encourages and seeks to resolve disputes with customers through out-of-court forms of dispute resolution.

Relations with Business Partners and the Public

41. The Group is constantly expanding its circle of partners, both in Lithuania and abroad, and working to strengthen relationships. Preference is given to partners whose understanding of business ethics does not conflict with the Group's principles of business ethics.
42. Suppliers are selected on the basis of fair, predetermined criteria, through a transparent and competitive bidding process, taking into account the supplier's qualifications, including the principles of the Code and the requirements set out in other documents.
43. Commitments are strictly adhered to, and partners are required to do the same. The security of partners' confidential information is ensured.

Relations with Government Officials and State Institutions

44. The law is always respected, and authorities are provided with all the information they require. The standards of transparency in dealings with public authorities and public representatives are extremely strict and high.

Preservation of Confidential Information

45. Employees are made aware of the definition of confidential information and the rules and procedures on the protection of it.
46. Employees are encouraged to share knowledge and experience within the boundaries of confidentiality – they may only share non-public information with colleagues who need to know that information for work purposes. This information may be disclosed to third parties only if it is necessary for the performance of activities or is required by applicable legislation, by ensuring that the recipients of the information ensure the confidentiality of the information received.
47. Documents containing confidential and non-public information and any personal data (whether about the Group's employees, investors or any third parties) must be retained or destroyed in accordance with the document retention and destruction requirements.
48. The obligation to protect and not disclose confidential information shall remain after the termination of the employee's employment relationship with the Group company.

Personal Data Protection

49. Personal data of customers, employees, partners and other subjects shall only be processed on a lawful basis and for a lawful purpose, ensuring their privacy, security and confidentiality, and with appropriate technical and organisational measures in place to protect against unauthorised access, disclosure, accidental loss, alteration, destruction or other unauthorised processing or loss of data.
50. Requests from individuals and other issues related to the processing of personal data and/or the rights of individuals are dealt with promptly and in accordance with the requirements of the law.

Business Documents and Settlement

51. All Group documents are prepared in accordance with legal requirements and good business practice.
52. The Group does not tolerate falsification of documents. Each employee must ensure that the documents meet the applicable requirements, are properly stored and protected. The accuracy, completeness and compliance of documents with legal acts is the responsibility of every employee.

53. Documents are part of the Group's assets and must be handled as responsibly by each employee as any other work tool.
54. The Group reports its performance and financial results in a timely and understandable manner and ensures that it earns its revenues ethically and legally and does not share inaccurate or unverified information.

Presentation of the Group

55. Employees should avoid speaking in public about the Group's activities unless they are related to their direct competences and unless they have a direct mandate to speak publicly. Inquiries from the media should be directed to the Group's employees responsible for communicating with such individuals. When speaking on important issues, the position must be agreed upon with the relevant Group company's management.
56. It is important to avoid speaking on behalf of the Group if a personal opinion or view is expressed in such a way. This principle shall also be applied when it comes to statements in the social space, on the Internet.

Implementation Procedure

57. The Code is made publicly available on the Group's website (<https://greengenius.com/>) so that it may be seen and complied with by any of the Group's employees, business associates, business partners, service providers, consultants and any other third parties with whom the Group's representatives, and any person acting on their behalf, have dealings.
58. It is the responsibility of the managers of each of the Group's structural divisions to ensure that the Code is communicated to their subordinates and persons reporting to them. All Group employees and members of the management and supervisory bodies are responsible for the proper implementation of this Code.
59. The Group facilitates the reporting of violations of the Code or the provision of relevant information relating to its enforcement by contacting trustline@greengenius.com or through the anonymous reporting channels specified in the Whistleblower Protection Policy. Whistleblowers who are employees of the Group (current and former), their family members, service providers of the Group or parties to other contractual and pre-contractual relationships, members of the management and supervisory bodies, shareholders, any other persons working under the supervision of the Group's contractors, sub-contractors, and suppliers shall be subject to the Whistleblower Protection Policy for the protection of whistleblowers from unreasonable adverse consequences.
60. All reports of possible violations of the Code must be dealt with appropriately in accordance with the procedures set out in the Whistleblower Protection Policy. If actions that do not comply with the provisions of the Code are identified, disciplinary measures shall be immediately taken, including temporary suspension from the current position or dismissal from work or termination of the contract with a third party.