

**PUBLIC LIMITED LIABILITY COMPANY LIETUVOS PAŠTAS**  
**CODE OF CONDUCT AND ETHICS**

The basis of Lietuvos Paštas (hereinafter referred to as the Company) activities is the practice of honest, transparent, open and ethical business. The Company adheres to international standards on human rights, working conditions, as well as the environment protection and anti-corruption standards. We apply national and international best practices in our operations and strive to be a business with an excellent reputation in the market.

This Code of Conduct and Ethics (hereinafter referred to as the "Code") defines the values, principles, professional and peer ethical standards that guide the Company. The Code helps employees to behave in accordance with the Company's expectations. For other stakeholders, the Code demonstrates the principles of ethical and responsible business conduct that guide the Company's activities and the behaviour that the Company expects from its business partners.

**I. Values and principles**

Our vision: a modern and reliable post office that connects Lithuania to the world.

Our mission: to conveniently receive and send. To all.

*Values of LLC Lietuvos paštas*

*WE COOPERATE:* • I know what result we are achieving together and what our customer expects; • I understand my part in achieving the common goal; • I share experience and knowledge so that we create higher value for our customers; • I notice, react and assess.

*WE ACCEPT RESPONSIBILITY:* • I adhere to agreements and rules; • I perform what I have promised to employees and customers; • I act respectfully with colleagues and customers; • I create an environment where it is easy to be and work.

*WE ARE CHANGING:* • We boldly change to work more efficiently and create more value for our clients; • We are positive and open to change; • I provide proposals on improving our operations; • I take initiative and act.

Cooperation, acceptance of responsibility, openness and courage to change are the values that unite the Company and underpin the provisions of this Code.

Every employee of the Company shall conduct his business in a **fair, impartial, objective and transparent manner**. We are constantly evolving and changing, looking for new, more advanced working tools and methods, understanding that innovative solutions are the basis for the success of the Company's activities. We are therefore striving to become **a more efficient and innovative Company**, and **sustainability and social responsibility** are always at the heart of every decision we make.

## **II. Relations with employees**

The success of our business is caused by our employees. We aim to be an attractive employer, able to attract and retain skilled and motivated staff, helping them to develop and build professional competences in a working environment. We uphold international human rights and respect the dignity of all workers, as defined in the United Nations Universal Declaration of Human Rights and the core conventions of the International Labour Organisation. We create a values-based organisational culture with mutual respect, equal opportunities and a motivating work environment as its foundation.

### **Respect for human rights**

We respect and guarantee human rights and freedoms, and uphold democratic values, in line with the guidelines set out in the Universal Declaration of Human Rights. Through our words, actions and proposed solutions, we show goodwill, mutual trust and respect for each other, and create a supportive and working atmosphere for our employees.

### **Equal opportunities**

We create a values-based organisational culture, advocating for equal rights and opportunities at work, regardless of gender, ethnicity, race, nationality, citizenship, language, social status, age, disability, health, political opinion, political party or association membership, religious belief, sexual orientation, etc.

### **Working conditions**

We aim to increase employee engagement, motivation and professional development, ensuring fair, market-oriented pay and a motivating work environment. For more information, see the [Payroll system](#).

We make sure work is safe, ensure safe work processes, and use reliable and safe tools to carry out our job well.

We are continuously improving, strengthening the skills of our employees and investing in their professional development.

## **III. Relations with the outside world**

We build and maintain open and constructive relationships with all stakeholders. We are accountable to our shareholders and the public for our performance. The Company ensures the provision of

services of general public interest, such as universal postal services and the delivery of periodicals to subscribers in rural areas, as defined in legislation and the Company's contracts.

The Company is accountable through publicity, regular reporting on its activities and financial statements.

### **Customer relations**

We strive for our customers to be able to conveniently send and receive parcels in the way they prefer: via the post office, LP EXPRESS couriers or a network of parcel lockers.

Customer cooperation is fostered by every employee of the Company. Our responsibility is not only to ensure the continuity of our services, but also to ensure the quality of our services by helping you get the right product, service or goods. Customers are served according to the highest quality standards, ensuring customer satisfaction and the long-term success of the Company.

### **Relations with operational partners and institutions**

We communicate openly with our operational partners, regulators and other authorities to establish and maintain a partnership based on mutual understanding and trust. We respond appropriately and in a timely manner to all requests, enquiries and letters from authorities and institutions, exchanging information and cooperating with supervisory authorities carrying out inspections or other oversight functions.

It is important to us that our business partners behave with integrity, act lawfully and transparently, are accountable for their actions to society, employees and the environment, and contribute to the prevention of corruption, as well as for fair competition. We encourage them to behave in accordance with [the Code of Conduct for Operating Partners](#).

### **Relations with competitors**

We hold our relationships with competitors to the highest standards of integrity. We do not tolerate practices that restrict fair competition.

We increase our competitive advantage in the market by introducing innovative solutions that improve the quality of our services and create added value for our customers. In the competitive market, the Company shall act in good faith in accordance with the provisions of ethical behaviour and morality, the Law on Competition and other legal acts in force in the Republic of Lithuania. We respect our competitors and treat them as we would like to be treated.

### **Relations with the media**

We build and maintain open and constructive relationships with the media, respond appropriately to media enquiries, and uphold the highest standards of transparency and openness.

The Company's principles of cooperation with the media are described in the Company's [Corporate communications policy](#).

### **Relations with political organisations**

The Company does not engage in political activities, nor does it endorse or receive any support from any political party, organisation or other person involved in politics.

We do not limit employees' personal initiative to participate in political activities, but employees' personal actions must be clearly distinguished and not linked to the Company's activities, position and responsibilities.

We provide timely and transparent comments, suggestions and positions on draft legislation that could affect the Company's operations, employees, the public and shareholders.

### **Public relations**

We are accountable to the public for our performance and results: consistent and transparent reporting on our activities and timely financial reporting. We promote dialogue with the public, education about our activities and developments.

We contribute to the well-being of society by working with a wide range of organisations and following the Company's [Corporate social responsibility guidelines](#).

## **IV. Transparent, open and honest operations**

Transparent, open and honest operations are one of the most important principles of "Lietuvos paštas", and we adhere to the highest standards in this area. We promote transparent, responsible and ethical market conduct.

### **Prevention of corruption**

In accordance with the provisions of the [Corruption prevention policy](#), we publicly disclose and undertake not to give or accept bribes, not to tolerate bribery, influence peddling, nepotism, unlawful pre-agreements, abuse of authority, dishonesty, or any such or similar activity with our customers, business partners, institutions, organisations or other persons in Lithuania or abroad. The Company shall notify the competent authorities if it detects evidence of a criminal offence.

As part of our commitment as a responsible business, which aims to increase public trust in the public sector and the decisions it makes, we do not accept or provide gifts that are not acceptable under the law.

The Company's employees are aware of the unacceptable gifts and inform the donor of the Company's [Gift policy](#). We record all cases of giving, receiving and refusing gifts in the [Gift Register](#) and inform the Company's Security and prevention department if we have any suspicions about a gift.

### **Conflicts of interest**

We pay particular attention to the coordination and control of public and private interests.

We declare our private interests publicly and honestly, avoiding potential conflicts of interest and recusing ourselves when they arise. We make decisions impartially and objectively, without bias or personality, based on facts and data.

Employees with declared private interests shall disclose their private interests openly and honestly by completing and updating their declarations of interest in a timely manner and by disclosing potential conflicts of interest in advance. Company employees shall not be involved in the making or execution of decisions that give rise to or may give rise to a conflict of interest.

## **Making transactions**

We conduct all purchases and sales in accordance with the principles of equality, non-discrimination, mutual recognition, proportionality and transparency and in accordance with established procedures.

We are guided by the principles of honesty and fairness in all our dealings with third parties in the field of real estate management.

The Company complies with legal requirements, the principles of fair and transparent competition, fair value for money and transparency in procurement procedures, quality requirements and deadlines, and responsible use of natural resources.

## **Data protection**

We only process personal data of customers, employees, business partners and other entities on the basis of business need, legal basis and purpose. We ensure the security of confidential information by taking appropriate technical and organisational measures to protect against unauthorised access, disclosure, accidental loss, alteration, destruction or other unauthorised processing.

We deal promptly with requests from individuals and other issues related to the processing of personal data and/or the rights of individuals.

## **V. Sustainability and social responsibility**

We strive to balance economic, social and environmental considerations to ensure sustainable and efficient operations, allowing us to contribute to society. The Company reaches almost everyone in Lithuania every day, so we are an integral part of many various communities. We aim to be open to community initiatives and to deliver maximum returns in the field of social responsibility.

The Company's services are provided responsibly, taking into account the expectations and interests of stakeholders, introducing measures to prevent corruption and improve the business climate. Based on best practices and the experience of international organisations, the Company improves its business practices, introduces a modern human resources management system, applies technologies that conserve natural resources, and facilitates working conditions by automating operational processes.

We protect the Company's resources and assets by conserving them and using them efficiently, and we report misconduct to those responsible.

We understand that our activities can have an impact on the environment, so we make decisions based on conservation of natural resources, energy reduction and other environmentally friendly factors. Decisions are made in accordance with the Company's [Social responsibility guidelines](#).

We follow the principles of social responsibility, both in our internal processes and in our relations with colleagues and/or stakeholders.

## **VI. Overseeing compliance with the Code of Conduct and Ethics**

The Code is published in the Company's internal and external communication channels.

Compliance with and implementation of the provisions of the Code is the responsibility of each employee of the Company.

The Code is the responsibility of the Company's management, which initiates periodic (at least once a year) reviews of the provisions and any necessary corrections. It is the responsibility of every Head of the Company to familiarize his employees with the Code and to ensure that its provisions are observed in their daily activities.

Proper oversight of compliance with the provisions of the Code shall be exercised by all levels of management.

Employees are encouraged to report possible violations of the Code to the Company's Helpline - by email at [pranesk@post.lt](mailto:pranesk@post.lt), to their direct manager, to the Head of the Security and prevention department or to any member of that department. In all cases, we guarantee confidentiality and the anonymity of whistleblowers.

This Code was approved on 22 February 2021.