

# Equal Opportunities Policy of UMEGA GROUP AB

Umega Group AB (Hennordic UAB, Hentech UAB, Umega Agro UAB, SnolTherm UAB, Snolvalda UAB, Walter Th. Hennecke GmbH, Snol Therm GmbH) operates and is managed according to the principles of gender equality and non-discrimination. Everyone shall be treated equally in the workplace, regardless of their sex, race, nationality, language, origin, social status, age, sexual orientation, disability, ethnic origin, membership of a political party or association, religion, belief, convictions or views, or intention to have a child or children. This document has been prepared following the recommendations of the Office of the Equal Opportunities Ombudsperson of the Republic of Lithuania.

The principles of gender equality and non-discrimination in Umega Group AB (hereinafter referred to as “the Group”) shall be observed in all areas related to the employment relationship:

- recruitment;
- providing opportunities for refresher training or retraining;
- making decisions on promotions or reassignments;
- providing opportunities for work experience;
- payment of salaries;
- granting additional leave and other benefits;
  - adjusting working time;
- appraisals;
- imposing sanctions or dismissals;
- after the termination or expiry of an employment contract.

**Balancing work and family commitments.** We help our employees balance their work and family commitments. Employees who have family commitments or are caring for a close relative can choose to work flexible hours.

**Adjusting working conditions for employees with disabilities.** We aim to adjust working conditions for employees with disabilities so that everyone has the same opportunities to work and fulfil their potential. Decisions on adjustments to working conditions are made on an individual basis, taking into account the needs of the employee, the nature and functions of their job and the cost arising from adjusting working conditions.

**Discrimination and harassment.** Gender equality, non-discrimination and a culture of respect are an integral part of our organisational ethics. All forms of harassment, sexual harassment and instructions to discriminate are prohibited within our Group.

**Instructions to discriminate are prohibited.** Instructions to discriminate are instructions to treat another employee or a job candidate less favourably on the basis of their sex, race, nationality, language, origin, social status, age, sexual orientation, disability, ethnic origin, membership of a political party or association, religion, belief, convictions or views, or intention to have a child or children.

**Harassment is prohibited.** Harassment is the systematic humiliating treatment of an employee based on their sex, race, nationality, language, origin, social status, age, sexual orientation, disability, ethnic

origin, membership of a political party or association, religion, belief, convictions or views, or intention to have a child or children.

**Sexual harassment is prohibited.** Sexual harassment is any unwelcome sexual conduct with the purpose or effect of violating the dignity of a person, in particular by creating an intimidating, hostile, degrading or offensive environment. Sexual harassment can be expressed verbally, in writing or through physical actions.

**Lodging a complaint.** We encourage you to report cases of discrimination, harassment and sexual harassment to your line manager, **HR Manager**, either verbally or in writing ([skaidrumas@umegagroup.com](mailto:skaidrumas@umegagroup.com)) or by completing the form on our website.

You can confidentially report any unlawful actions in the Group companies that threaten the public interest by sending a report in accordance with the procedure provided for in the Law on the Protection of Whistleblowers of the Republic of Lithuania to: [praneseju.apsauga@umegagroup.com](mailto:praneseju.apsauga@umegagroup.com).

More information: <http://umega.wam.lt/reporting/>

The provisions of this Equal Opportunities Policy apply to all current and potential employees and job candidates.

All reports of possible violations shall be examined in accordance with the procedure for receiving and examining information of the relevant reporting channel through which the information was received. If any actions are found to be in violation of the policy, disciplinary measures shall be taken immediately.

The **HR Manager** is responsible for monitoring equal opportunities within the Group.

Everyone who works for or with our Group company shall be familiarised with this document so that they are aware of their rights and our commitment to respect them.

The Group respects human rights in all its areas of activity and monitors compliance with the fundamental values set out in this document. This policy is very important to us, is reviewed annually and updated if needed.

Approved in Umega Group AB,  
by the Order of 21 February 2025 of  
Gediminas Čeika, CEO of Umega Group AB.