

# Code Of Ethical Employment OF UMEGA GROUP AB

We aim for every employee of the **Umega Group AB companies (Hennordic UAB, Hentech UAB, Umega Agro UAB, SnoiTherm UAB, SnoiValda UAB, Walter Th. Hennecke GmbH, Snoi Therm GmbH)** to feel respected, appreciated and safe. Respect, tolerance and caring for each other are the core values that underpin communication and collaboration in our companies. We have prepared this document so that all those who work at the companies of **Umega Group AB** (hereinafter referred to as “the Group”) can strive together to achieve the highest standards of ethical business and to base their daily activities on fundamental human values that reflect human rights, freedoms and equal opportunities for development and growth.

1. Employment is freely chosen. Employment with the Group is voluntary and it is possible to terminate the employment relationship without restrictions by notifying about it in accordance with the procedure provided for by the law.
2. The heads of the Group respect and support the employees' right to form peaceful associations and to bargain collectively. The Group shall not interfere in this activity, not discriminate against employee-elected representatives and allow them to carry out the representative functions in the company.
3. The Group companies shall ensure safe working conditions that meet the basic needs of human beings. Employees shall be made aware of the potential hazards inherent in manufacturing companies in this industry and their activities. The Group shall take all adequate steps to prevent accidents and injury to health of employees in their workplace. Employees shall receive regular and recorded health and safety training. Such training shall be repeated for new and reassigned employees. The Group strives to improve the working conditions of each employee as far as possible, so that they can feel dignity and not feel discomfort. If accommodation is provided, the employer undertakes to ensure that it is clean, safe and meets the basic needs of employees. Compliance with occupational health and safety standards within the Group is the responsibility of the heads of the companies.
4. The company shall not employ children. Young persons under 18 shall not be employed. The company shall comply with Lithuanian laws and labour legislation on the employment of minors.
5. The Group regularly reviews pays and ensures that employees are paid appropriately for their work. The guaranteed pay is not lower than the minimum wage. Before signing an employment contract, employees shall be provided with information on their working conditions and pay. Employees shall be provided with information about the particulars of their wages for the pay period concerned each time that they are paid. The company shall not impose disciplinary measures or any deductions from wages not provided for in the Labour Code of the Republic of Lithuania without the expressed permission of the employee concerned.
6. All overtime shall be voluntary within the company. Monitoring shall be carried out to ensure that employees work the number of working hours provided for by national legislation.

7. The Group respects each employee. The Group does not tolerate discrimination based on race, sex, nationality, language, origin, marital or social status, age, sexual orientation, disability, health, ethnic origin, membership of a political party or association, religion, belief, convictions or views. Employees shall not be discriminated in hiring, pay, access to training, promotion, termination of employment or retirement.
8. Employment relationships within the Group shall be based on respect and fairness and shall not contravene the laws of the country. The employer shall seek a permanent employment relationship and shall not enter into short-term contracts of employment with employees just to avoid obligations.
9. The company does not tolerate harsh or inhumane behaviour and prohibits any violence, threats thereof, harassment, abuse or any other form of degrading or offensive treatment.

This document, which has been prepared based on the ETI Base Code, Ethical Trading Initiative's code of labour practice, is publicly available, accessible to everyone and is published on the Group's website at [www.umegagroup.com](http://www.umegagroup.com), so all stakeholders can read it.

The implementation and monitoring of ethical employment standards within the Group is the responsibility of the **HR Manager**. The heads of the Group are obliged to communicate this code to their teams, suppliers and stakeholders with whom they work.

The Group undertakes to follow the ethical employment principles and monitors compliance with the provisions set out in this document. You can anonymously and confidentially report any questionable activities or violations of the provisions of this document by completing the form on our website or by sending an email to [skaidrumas@umegagroup.com](mailto:skaidrumas@umegagroup.com).

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/>

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 code, disciplinary measures shall be taken immediately.

This code 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.