

Human Rights Policy of UMEGA GROUP AB

This policy, which has been prepared based on the United Nations' <u>Universal Declaration of Human Rights</u>, defines the basic principles that we follow in our activities in all the companies of **Umega Group AB** (hereinafter referred to as "the Group"): **Hennordic UAB, Hentech UAB, Umega Agro UAB, SnolTherm UAB, Snolvalda UAB, Walter Th. Hennecke GmbH, Snol Therm GmbH**.

We do not make exceptions based on the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust or under any limitation of sovereignty. Every person's human rights are respected equally.

Ensuring human rights is of utmost importance to us. We strive to do this in our own activities, but we also want our partners and suppliers to adhere to the following principles and monitor their compliance:

- 1. We respect the inherent freedom, dignity and right to equality of every human being.
- 2. We do not tolerate discrimination in any form. We accept and respect all people, without distinction as to their race, colour, sex, language, nationality, religion, political or other opinion, financial, social or other status. All are entitled to equal protection against all forms of discrimination and against any incitement to such discrimination.
- Our aim is to ensure that people feel safe and free to make decisions and express their
 opinions, and that they are not humiliated, physically or psychologically harmed or their dignity
 is not undermined.
- We are strongly opposed to, ready to react promptly and stop torture, cruel, inhuman or degrading treatment or punishment in our company or in the companies related to our activities.
- 5. All persons are equal before the law and are entitled without any discrimination to the equal protection of the law. Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted them by the constitution or by law.
- 6. No one shall be subjected to arbitrary arrest, detention or exile.
- 7. Everyone has the right to freedom of movement and residence within the borders of each country. Everyone has the right to leave any country, including their own, and to return to their country.
- 8. We respect the right of every person to be presumed innocent. Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which they have had all the guarantees necessary for their defence.
- 9. Everyone has the right to seek and to enjoy in other countries asylum from persecution, except in cases of persecution genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations and the law of the country.
- 10. No one shall be arbitrarily deprived of their nationality or denied the right to change their nationality.
- 11. We respect the right of every person to privacy. No one shall be subjected to arbitrary interference with their privacy, family, home or correspondence, nor to attacks upon their honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.

- 12. Everyone has the right to freedom of thought, conscience and religion. This right includes freedom to change their religion or belief, and freedom, either alone or in community with others and in public or private, to manifest their religion or belief in teaching, practice, worship and observance.
- 13. People who do the same or equivalent work and whose competencies, seniority or other objectively measurable indicator of performance or abilities match shall receive the same pay without any discrimination.
- 14. Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
- 15. Everyone who works has the right to just and favourable remuneration ensuring an existence worthy of human dignity for themselves.
- 16. Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.
- 17. We support and respect everyone's right and freedom of peaceful assembly and association, including trade unions.
- 18. Everyone has the right to freedom of opinion and expression. This right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.
- 19. In the exercise of their rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.

In order to make our principles and values known to all our stakeholders, this policy is publicly available on the Group's website at www.umegagroup.com.

The **HR Manager** is responsible for monitoring human rights 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. You can report any questionable activity related to human rights or violations of human rights by contacting the person responsible for this policy directly, or anonymously and confidentially by completing the form on our website or by sending an email to 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.

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 policy, disciplinary measures shall be taken immediately.

This policy is very important to us, is reviewed once a year and updated as necessary.

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