

Violence And Harassment Prevention Policy of UMEGA GROUP AB

CHAPTER I

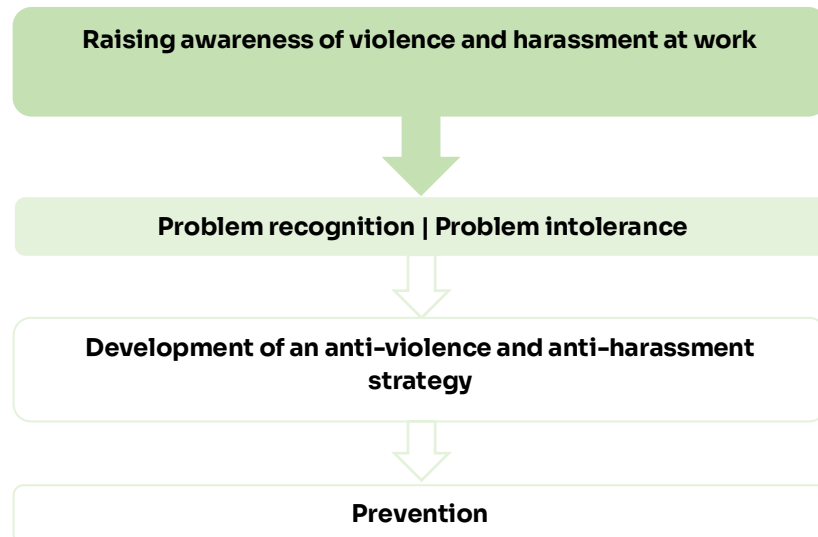
GENERAL

1. The purpose of the Violence and Harassment Prevention Policy (hereinafter referred to as the "Policy") is to provide for and implement effective and efficient preventive measures to protect the employees of the companies of **Umega Group AB (Hennordic UAB, Hentech UAB, Umega Agro UAB, SnoiTherm UAB, SnoiValda UAB, Walter Th. Hennecke GmbH and Snoi Therm GmbH)** from violence and harassment, and to help the employees to clearly and accurately understand the possible manifestations of violence and harassment at work, to recognise their signs and know the remedies.
2. The Policy applies to employees of all the companies of **Umega Group AB** (hereinafter referred to as the "Group"), regardless of their position or type of employment contract.
3. Key terms in this Policy:
 - 3.1. **responsible person** means a person appointed by a head of the Group who is responsible for the prevention of violence and harassment in the Group companies and who examines cases of violence and harassment at work in accordance with the established procedures;
 - 3.2. **employer** means the Group companies: **Hennordic UAB, Hentech UAB, Umega Agro UAB, SnoiTherm UAB, SnoiValda UAB, Walter Th. Hennecke GmbH and Snoi Therm GmbH**;
 - 3.3. **employee** means a person who works for the Group under an employment contract;
 - 3.4. **victim** means an employee of the Group who has experienced or may have experienced violence and harassment at work;
 - 3.5. **report** means provision of information about violence and harassment at work, either verbally or in writing;
 - 3.6. **psychosocial factor** is a factor that causes mental stress experienced by an employee as a result of working conditions, work requirements, work organisation, work content, relationships between employees or the relationship between the employer and the employee;
 - 3.7. **violence and harassment** (including psychological violence, gender-based violence and harassment) means **any unacceptable conduct or threat thereof**, whether isolated or recurring, which is intended to have, has or can have a physical, psychological, sexual or economic effect, violates the dignity of an employee or creates an intimidating, hostile, degrading or offensive environment and/or has caused or can cause physical, material and/or non-material damage;
 - 3.8. **gender-based violence and harassment** means violence and harassment directed against employees based on their gender or disproportionately affecting employees of a particular gender, including sexual harassment;
 - 3.9. other terms are the same as those used in the legislation.

CHAPTER II

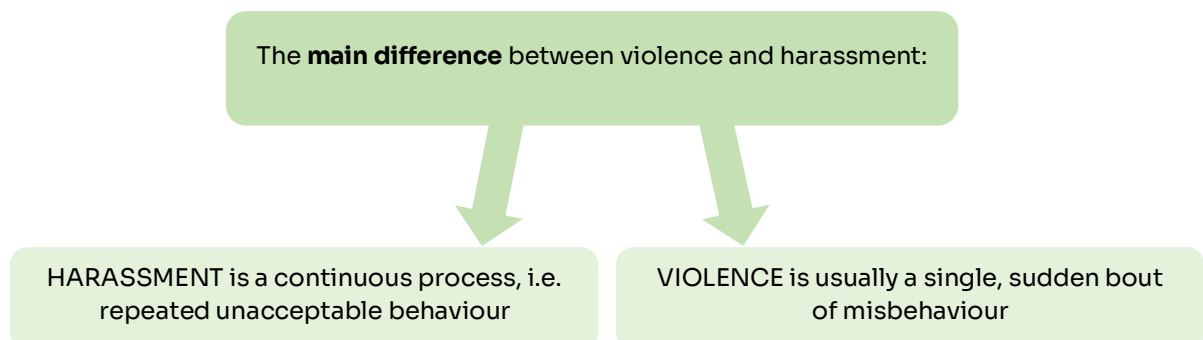
VIOLENCE AND HARASSMENT AT WORK

4. Awareness of violence and harassment at work:



5. Recognising violence and harassment:

- 5.1. **violence and harassment** means unacceptable conduct of one or more persons that can manifest itself in various forms;
- 5.2. **harassment** means unwelcome conduct with the purpose or effect of violating the dignity of a person, and of creating an intimidating, hostile, degrading or offensive environment based on sex, race, nationality, citizenship, language, origin, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion. Harassment can be expressed verbally, in writing or, less commonly, through physical actions;
- 5.3. **sexual harassment** is unwelcome abusive conduct of sexual nature, whether it is expressed verbally, in writing or through physical actions, towards a person, with the purpose of violating the dignity of the person, especially by creating an intimidating, hostile, degrading or offensive environment;
- 5.4. **violence** is the action or inaction of a person or persons causing work-related intentional physical, mental, sexual, economic effect on another person, as a result of which the employee suffers or may suffer non-material or material damage.



The most common expressions (forms) of violence and harassment

Psychological pressure | Unethical, disrespectful conduct towards other employees | Insults | Unwarranted remarks and criticism | Threats | Prohibitions | Unethical comments | Intimidation | Degradation | Abuse | Dismissing achievements | Defamation | Ignoring | Oppression | Manipulation | Sarcasm | Desire to ridicule | Insults | Shouting | Other unacceptable conduct intended to hurt, intimidate or belittle an employee

Possible abusers

An employee | A group of employees | Customers | Other third parties

Warranted work-related criticism – the employer has the right to evaluate an employee's performance or professional qualities. During the employee's appraisal, the employer may identify their work strengths and weaknesses and provide feedback.

What is not considered violence and harassment?

The most common instances where legitimate employer actions may be wrongly considered violence and harassment:

Strictness: the employer may check if an employee is fulfilling the duties assigned to them in the employment contract and may demand compliance with local legislative requirements (arriving at work on time, not leaving the workplace without the line manager's permission, etc.).

Misconceptions about violence and harassment: an employee may not be aware of the legislative requirements they must comply with and may not be properly familiar with the company's internal regulations, etc.

Misunderstandings/discussions/differences of opinion between the employer and an employee cannot be automatically regarded as violence and harassment.

6. **Violence and harassment are prohibited:**
 - 6.1. in workplaces, including public and private places where the employee is at the employer's disposal or carries out their duties under an employment contract;
 - 6.2. during rest and meal breaks, or when using domestic, sanitary and hygiene facilities;
 - 6.3. during work-related trips, travel, training, events or social activities;
 - 6.4. through work-related communication, including communication via information and electronic communication technologies;
 - 6.5. in the accommodation provided by the employer;
 - 6.6. commuting to or from work.
7. The anti-violence and anti-harassment strategy is set out in Annex 1.
8. The action diagram for employees who have experienced or may have experienced violence and harassment at work is provided in Annex 2.

CHAPTER III

RULES OF CONDUCT (ETHICS) FOR EMPLOYEES

9. All employees of the Group companies shall comply with the rules of conduct (ethical rules) set out in the Group's Code of Conduct, which aims to create a work environment that defends and protects the honour and dignity, physical or psychological integrity of any employee or group of employees.
10. The basic rules of conduct for employees are set out in Annex 3.

CHAPTER IV

PROCEDURE FOR SUBMITTING AND EXAMINING REPORTS OF VIOLENCE AND HARASSMENT

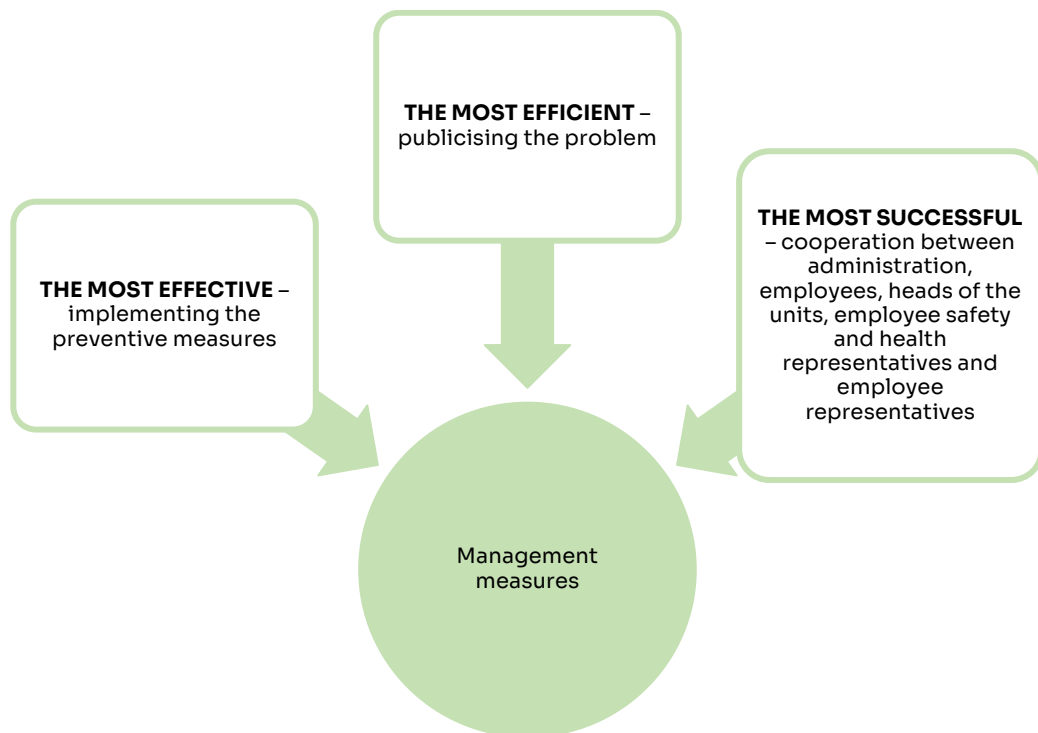
11. Any employee who reasonably believes that they have or may have experienced violence and harassment has the right to report it, either verbally or in writing, to the person responsible.
12. It is recommended that the employee includes the following information in their report:
 - 12.1. the situation, manifestations and circumstances of the incident;
 - 12.2. whether the unacceptable behaviour was committed by an employee or another person (customer, etc.) and, if known, their details (name, surname, etc.);
 - 12.3. any possible witnesses;
 - 12.4. any other available information (sound recordings made in a lawful manner, correspondence, etc.).
13. All reports (both verbal and written) must be recorded and examined. The responsible person shall record the reports in a non-public register (Annex 4).
14. The employee performing the document management function shall not register a report if it is received by post. It shall be handed over immediately, but not later than the next working day, to the person responsible, who shall record it in the designated register.
15. The responsible person shall report the information received to the head of the company without delay, but no later than the next working day.
16. After assessing the situation, the manifestations and the circumstances of the incident described in the report, the head of the company shall instruct the responsible person to examine the case of violence and harassment at work.
17. The main functions of the responsible person:
 - 17.1. assessing the information received on violence and harassment as soon as possible, but no later than 5 working days from the date of receipt of the report;
 - 17.2. interviewing the person who submitted the report and the person who is the subject of the complaint (the parties have to be interviewed separately). If needed, interviewing other persons who can provide additional information, if requested by the person who submitted the report;
 - 17.3. if needed, gathering additional information related to the report and ascertain additional circumstances of the incident;
 - 17.4. examining the case of violence and harassment at work as soon as possible, but no later than 1 month from the date of receipt of the report;
 - 17.5. after the examination of the case of violence and harassment at work, providing the findings to the head of the company who shall decide on further action and/or measures. Informing the employee who submitted the report of the decision (if the employee has requested this).
18. The responsible person has the right to:
 - 18.1. suggest to the head of the company that the victim be allowed to be absent from the workplace while the report is being examined;
 - 18.2. consult a psychologist, in agreement with the head of the company, if it is difficult to ascertain the circumstances of the unacceptable behaviour or if there is doubt about the validity of the report of unacceptable behaviour;
 - 18.3. make suggestions to the head of the company on further action to be taken in relation to the victim and the person who has behaved in an unacceptable manner or who has subjected the employee to violence and harassment;
 - 18.4. recommend to the head of the company that the report be dismissed as unfounded.
19. **Principles for the examination of the report:**
 - 19.1. presumption of innocence – a person shall be presumed innocent until a decision has been taken on their unacceptable behaviour;
 - 19.2. promptness – the case shall be examined in the shortest possible time;

- 19.3. direct involvement – all persons involved in the case (the victim, the employee who has or may have behaved unacceptably, witness/es) shall be afforded every opportunity to provide explanations;
- 19.4. impartiality – the case shall be examined in an objective manner, with no preconceived notions about the assessment of the circumstances.
- 20. **Confidentiality:**
 - 20.1. to ensure confidentiality, the responsible person must sign a confidentiality undertaking. It is prohibited to disclose any information relating to the examination of the case of violence and harassment at work to any person not involved in the examination;
 - 20.2. confidentiality of the employee who submitted the report shall be ensured;
 - 20.3. any persecution or hostile treatment of the employee who has submitted the report on the violence and harassment experienced is prohibited and constitutes a gross misconduct.

CHAPTER V

PREVENTIVE MEASURES

- 21. Measures to manage psychosocial risk factors must be identified and implemented in order to reduce and/or address violence and harassment in the work environment.



- 22. The company has identified key preventive measures:
 - 22.1. **improving the psychosocial work environment:**
 - 22.1.1. ensuring justice and a sense of safety in the workplace. Respectfully and objectively assessing employees' capabilities and performance, fairly allocating company resources and the equitable remuneration for work. Aiming to ensure that the workload of employees is optimal and they have sufficient time to complete tasks;
 - 22.1.2. ensuring a safe and healthy work environment in all aspects related to the employment relationship;
 - 22.1.3. improving the work-life balance of employees;
 - 22.1.4. organising various leisure activities and cultural events;
 - 22.1.5. taking into account the collaboration of employees (whether they like working together, whether they get along and work in a unified manner, whether the work is evenly distributed, how well employees from different

- professions work together, whether conflicts are frequent);
 - 22.1.6. employees must be certain about the work-related expectations of them. The job has to be clearly defined and employees have to be adequately trained for the job;
 - 22.1.7. employees have to trust their line manager, and the line manager has to be interested in how their subordinates feel;
 - 22.1.8. avoiding prolonged stressful situations and monitoring cases of sickness absence to prevent an increase in violence and harassment in the workplace;
- 22.2. **improving the physical work environment:**
 - 22.2.1. ensuring that workplaces are comfortable and safe by meeting the legislative requirements for workplaces;
 - 22.2.2. ensuring that work equipment is in good working order and maintained;
- 22.3. **recording and examining cases of violence and harassment at work:**
 - 22.3.1. employees shall be informed of the possibility of reporting violence and harassment they have or may have experienced at work;
 - 22.3.2. cases of workplace violence and harassment shall be recorded and examined in accordance with the procedures established by the company;
- 22.4. **informing and training employees and managers:**
 - 22.4.1. awareness materials (posters, leaflets, booklets, etc.) shall be made available to employees to provide them with information on violence and harassment at work and its effects, preventive measures, who to contact in case of unacceptable behaviour, etc.;
 - 22.4.2. all employees shall be familiarised with (through conferences, meetings or other public means) the Policy, the anti-violence and anti-harassment strategy, the rules of expected positive behaviour, the measures implemented, the remedies, etc.;
 - 22.4.3. all employees shall be made aware that violence and harassment are not tolerated;
 - 22.4.4. employees must be periodically reminded of potential situations of violence and harassment, decisions made in the examined cases of violence and harassment at work, and acceptable behaviour to help avoid and/or reduce conflicts at work;
 - 22.4.5. employees and managers shall receive training on stress and conflict management, understanding violence and harassment and its dangers, preventive measures, improving communication skills, etc.;
 - 22.4.6. managers shall receive training to improve their competence so that they can recognise unwelcome behaviour of employees, assess potential consequences of conflict at work and identify measures to prevent violence and harassment from occurring, help employees who have experienced violence and harassment at work, ensure the confidentiality of information on employees who have experienced violence in accordance with current legislation, and foster a work environment based on mutual respect;
- 22.5. **cooperation:**
 - 22.5.1. employees shall be encouraged to talk about violence and harassment at work openly and create respectful communication, etc.;
 - 22.5.2. employees and their representatives (trade unions) shall be involved to ensure the effective and successful implementation and execution of the Policy;
 - 22.5.3. collaboration between employees and managers must be based on respect and openness;
- 22.6. **assigning the responsible person:**
 - 22.6.1. the responsible person shall:
 - 22.6.1.1. inform an employee who has experienced violence and harassment at work of the assistance available to them and organise the assistance they need;
 - 22.6.1.2. advise employees on issues of violence and harassment at work or in the event of conflict;
 - 22.6.1.3. listen to employees' concerns and organise internal communication (informing employees about cases of psychological violence at work and how they were resolved, the possible dangers of psychological violence and how to protect themselves);
 - 22.6.1.4. ensure the provision of feedback;
 - 22.6.1.5. carry out any other functions assigned by the head of the company relating

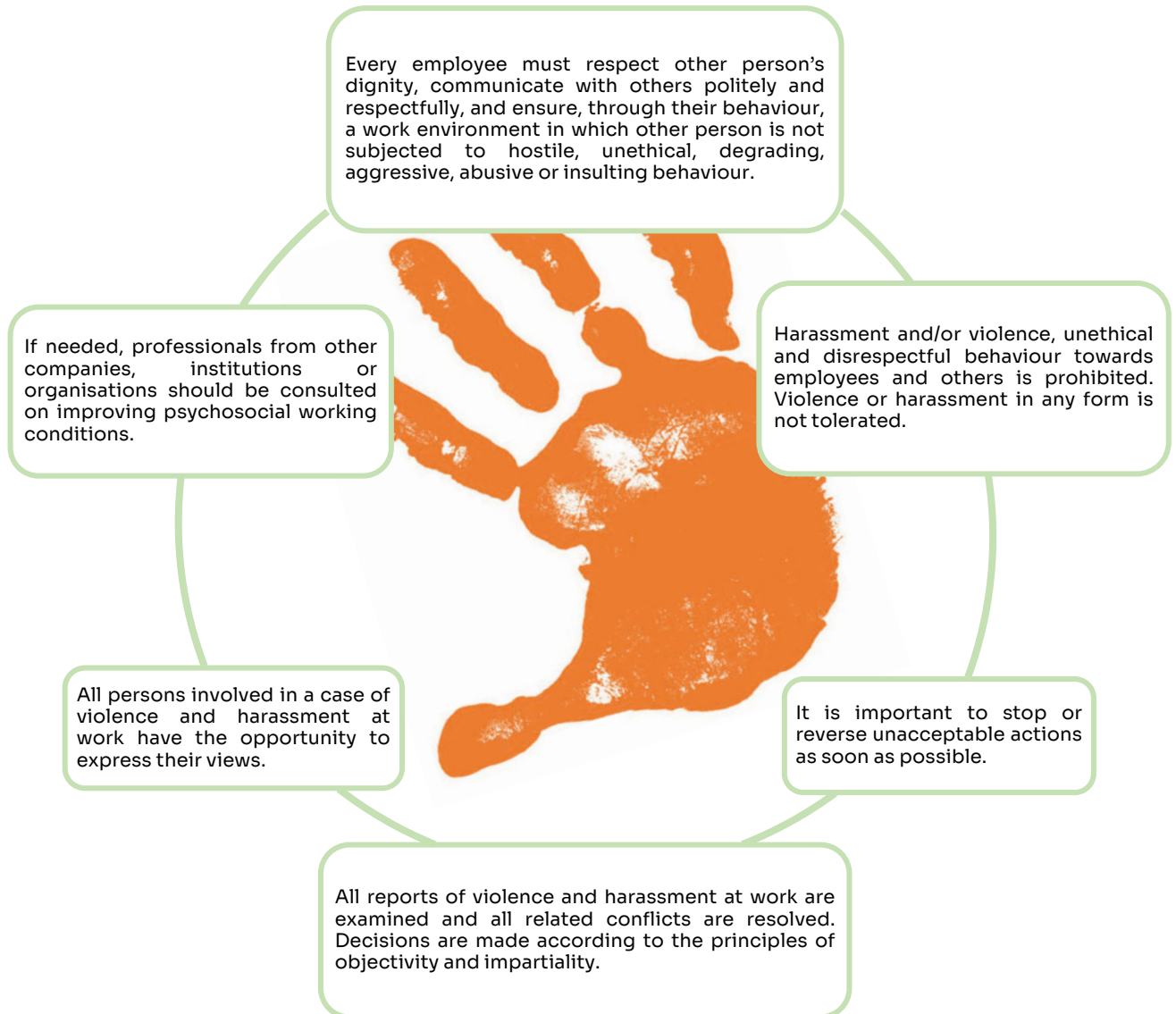
- to violence and harassment prevention;
- 22.7. **providing assistance to victims of violence and harassment at work:**
 - 22.7.1. ensuring that help of all necessary professionals (psychologists, psychiatrists, etc.) is provided to the victim who may be experiencing anxiety, fear, irritability, sleep disorders, anger, irritation, etc.
 - 22.7.2. ensuring the victim's reintegration into the workplace or relocation, granting leave;
 - 22.7.3. if necessary, helping the victim to take their case to court;
 - 22.8. **applying extreme measures against the perpetrator:**
 - 22.8.1. reacquainting with the Policy and other relevant documents, drawing additional attention to what was complained about;
 - 22.8.2. written warnings, transfer to another department or position, dismissal. Before applying these measures, both parties shall be heard objectively (taking into account the explanations, circumstances and the perpetrator's past behaviour), an informal conversation with the perpetrator shall be initiated, and psychological counselling shall be arranged.
- 23. The head of the company shall appoint the person(s) responsible for organising and implementing the preventive measures.
 - 24. The preventive measures may be applied all at once or implemented in stages, in order of priority.
 - 25. The preventive measures must be reviewed (taking into account the manifestations of violence and harassment at work identified in the company) and, if necessary, updated.
 - 26. Additional preventive measures may be provided following the examination of a case of violence and harassment at work.

CHAPTER VI FINAL PROVISIONS

- 27. The Policy shall be reviewed and updated in light of received reports of violence and harassment, identified cases of violence and harassment, changes in the potential risks of violence and harassment, or the emergence of new risks, or at the request of the labour inspector of the State Labour Inspectorate of Lithuania.
- 28. Failure to comply with the Policy is considered a gross misconduct and may result in termination of the employment contract.
- 29. Employees shall be held liable for false reports in accordance with the procedures established by legislation of the Republic of Lithuania.
- 30. Employees have the right to make suggestions for improving the provisions of the Policy.

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

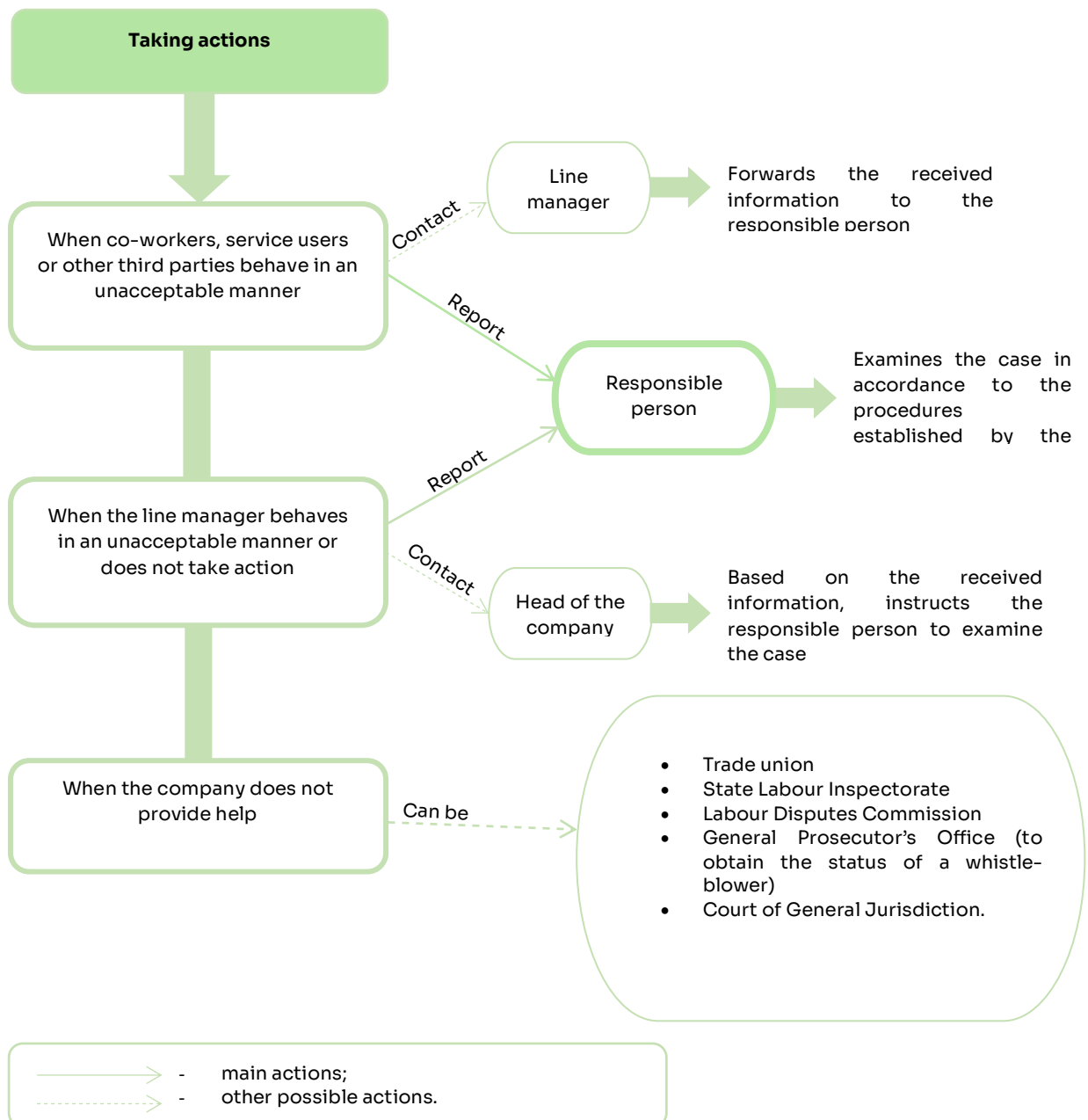
**ANTI-VIOLENCE AND ANTI-HARASSMENT STRATEGY
OF UMEGA GROUP AB**



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

ACTION DIAGRAM FOR EMPLOYEES WHO HAVE OR MAY HAVE EXPERIENCED VIOLENCE AND HARASSMENT AT WORK

OF UMEGA GROUP AB



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

RULES OF CONDUCT FOR EMPLOYEES. EMPLOYEE GUIDE

OF UMEGA GROUP AB



Unacceptable conduct *(the list is not exhaustive):*

Worsening working conditions, etc. | Unwarranted criticism of the tasks carried out, etc. | Spreading information that is false and may harm the honour and dignity of an employee, etc. | Unpleasant various comments, etc. | Separating an employee from the team and shared activities, etc. | Not sharing information, etc. | Constantly disregarding and denying an employee's requests and needs, etc. | Giving an inappropriate amount of work, etc. | Manipulating the pay, etc. | Threats related to an employee's finances, etc. | Making unrealistic demands, etc. | Vicious mockery, snide irony, etc. | Making derisive remarks or associative jokes about an employee, etc. | Talking in a raised tone, uncontrolled emotions, etc. | Scorning, public comments intended to humiliate, belittle, etc. | Insults intended to undermine an employee's self-confidence, etc. | Actions, statements or gestures directed against the self-respect and self-esteem of an employee with the intention of degrading them | Unlawful, deliberate physical effect on an employee's body against their will | ...



Acceptable conduct *(the list is not exhaustive):*

Open and fair communication | Making mutually beneficial decisions in conflicts | Willingness to compromise | Valuing opinions | Listening without personal prejudice | Respectful and tolerant behaviour towards colleagues | Behaviour that makes others feel physically and emotionally safe at work | Helping other colleagues in their professional activities | Sharing experience and knowledge | Acknowledging one's own professional mistakes | Not abusing power or authority | ...



Keep in mind that you have the right to:

Work in a safe work environment free from violence and harassment | Have clearly defined job functions and responsibilities | Receive training on the prevention of violence and harassment | Be involved in nurturing your workplace culture and ensuring communication quality | Reconcile your work and personal life needs | Participate in assessing occupational risks | Participate in developing and implementing an anti-violence strategy | Make suggestions on violence and harassment prevention | Use the measures provided to prevent violence and harassment.



Violence or harassment, including psychological violence and gender-based violence or harassment (violence and harassment directed against employees based on their gender or disproportionately affecting employees of a particular gender, including sexual harassment), acts of a discriminatory nature or violation of the honour and dignity in respect of other employees or third parties during work or at the workplace is considered a gross misconduct *(in accordance with Article 58(3)(4) of the Labour Code of the Republic of Lithuania)*.

Treat your colleagues as you would want to be treated by them!

REGISTER OF REPORTS OF VIOLENCE AND HARASSMENT AT WORK

OF UMEGA GROUP AB

No.	Name and surname of the person submitting the report	Date of submission	Short description of the case of violence and harassment at work	The decision made

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