

APPROVED BY
The Order No. V-21/075 of
13 September 2021
of the General Manager of
UAB ALTAS komercinis transportas

COMPLIANCE RISK ASSESSMENT/ONGOING MONITORING POLICY

ALTAS komercinis transportas UAB (hereinafter referred to as the Company) has a compliance risk assessment and ongoing monitoring system.

Board oversight of compliance and risk issues

Manager, responsible for Compliance of Social Accountability Policy, is CEO of the Company Edvardas Radzevičius (Compliance manager).

Company Compliance Manager is responsible for monitoring the effectiveness of Social Accountability Policy and will review the implementation of it on a regular basis. The Company will assess its suitability, adequacy, and effectiveness in annual management review, and proceed with corrective actions accordingly. Any need for improvements will be applied as soon as possible, after evaluation of impact the changes to interested parties (employees, suppliers, business partners or public sociality).

Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Compliance Manager.

Whistleblower system, investigation and sanction process

If employee, business partner, supplier (direct or from whole supply chain), community, or other interested party have reason to believe or suspect that:

- an instance of bribery or corruption has occurred or will occur in the future that breaches declared Social Accountability Policy,
- the principle of equal opportunities has been violated or subjected to discriminatory actions, or has become the object of sexual harassment or harassment;
- the Company not follow the other principles declared in Social Accountability Policy,

they can notify by communications channels ("Compliance Line") below:

- the Compliance Manager by email report@altasauto.com;
- leave a note in the "Suggestions and complaints box" in the Company;
- either via phone, No +37069825442.

The confidentiality of the person reporting to the Compliance Line shall be ensured and the information shall be limited to the Compliance Manager. Relevant investigation will be supervised by Compliance Manager of the Company.

In all cases the persons reporting to the Compliance Line shall be protected from any threats, sanctions or mistreatment for merely reporting the information to the Compliance Line.

All information reported to the Compliance Line shall be assessed and appropriate actions shall be taken if considered as necessary.

This may include an informal internal inquiry or more formal investigation actions.

The person reporting to the Compliance Line shall be informed in the due course of investigation process.

If any employee or business partner breaches this policy, the investigation will be carried out in accordance with the laws of the Republic of Lithuania.

Company has the right to terminate a contractual relationship with an employee or a business partner if they breach this policy.
