

CORPORATE SOCIAL RESPONSIBILITY POLICY

POLICY BRIEF AND ITS PURPOSE

1. UAB ALTAS komercinis transportas (hereafter – “the Company”, or “We”) aims to form fair, ethical and transparent relationships with our business partners, including suppliers, distributors and all other third parties as well as our employees.
2. Never stop moving – this simple yet universal thought stimulates us to continue improving. It prompts us to design new products, improve the production processes, search for new materials and develop our competences. It is an impulse to progress in a targeted direction where future awaits the perfectionists of automobile engineering.
3. Our Corporate Social Responsibility (CSR) company policy refers to our responsibility toward our environment. Our company’s existence is not lonely. It’s part of a bigger system of people, values, other organizations and nature. Our CSR policy outlines our efforts to give back to the world as it gives to us. CSR policy is designed to make sure our business acts ethically, considers human rights and is aware of the social, economic and environmental impacts of what we do — and acts on this.
4. This CSR policy applies to our company, involving our dealers, business partners, suppliers to make every effort and spread the same commitments further down the supply chain.
5. We want to be a responsible business that meets the high standards of ethics and professionalism.
6. Our company’s social responsibility falls under two categories: compliance and proactiveness. Compliance refers to our company’s commitment to legality and willingness to observe community values. Proactiveness is every initiative to promote human rights, help communities and protect our natural environment.

CORE VALUES OF OUR COMPANY

7. *Resolution.* I am seeking solutions, not restrictions. I am proactive, I want to act. I persevere in seeking goals. I am capable of involving others.
8. *Openness.* I speak up about problems openly. I accept and respect other persons’ opinion and constructively express my own opinion. I boldly offer new

ideas and express my views. I do not conceal and openly share relevant information.

9. *Responsibility.* I take rational decisions thinking about the consequences. I keep promises – I do as I say. I always strive for quality. I work in such a way as to save and earn extra money.
10. *Knowledge thirsty.* I deepen my knowledge in the area of interest independently. I apply the acquired knowledge in practice. I am happy with discoveries and new knowledge, I am open to them. I always ask 5 “why”?

COMPLIANCE WITH LEGAL ACTS

11. The Company shall comply with the applicable requirements of laws and other legal acts in its activities.
12. The Company, its employees, business partners must be thoroughly aware of the legal acts regulating the performance of its commercial and other activities. The Company provide its employees and representatives with all necessary explanations and advice in the field of application of the legal acts in performance of their working functions.
13. The Company is committed to act in compliance with non-discriminatory and fair operational standards, protect environment and ensure safety and health of its employees.
14. The Company shall follow all the laws and regulations related to healthcare, safety and environment, obtain all necessary permits and perform its works in compliance with the requirements of appropriate legal acts.
15. The Company shall never aim to gain business advantage by unlawful means. The Company shall never participate and encourage its business partners not to take part in any bid rigging, price fixing, cartel, trading in information, money laundering, theft of trade secrets, manipulation, improper influencing or other unfair competition practices.
16. Fair competition is the fundamental principle in the performance of the Company. Information on the activities of the competitors shall be collected only by lawful and publicly available information collection means.
17. The Company shall take reasonable actions in order to prevent any unlawful acts of any employee, customer, business partner or any third party, which would cause damage to the state and the public in general as well as to the Company, its customer, employee or business partner individually.

ANTI-BRIBERY

18. The Company has a zero-tolerance policy towards any form of corruption and financial irregularity. We are committed to fight corruption, including bribery and extortion, negligent financing of criminal activities and/or unethical practices.
19. The Company, its employees and representatives shall not offer, promise, give, request, agree, accept or receive any type of improper payments, gifts,

sponsorships, donations, bribes, entertainment, hospitality, or improper benefits directly or indirectly to obtain or retain a personal or business advantage from or to any public official or employee or representative of a state-owned or private enterprise.

20. An employee or representative of the Company who suspects that any third party (customer, supplier, colleague, etc.) is trying to involve or use him/her in conclusion of unlawful transaction, must report that to the management of the Company and *the Compliance line* (Para. 48; 49) of the Company.

HUMAN RIGHTS AND WORKING CONDITIONS

21. The Company is committed to protect and promote the human rights. The Company respect all internationally recognized human rights standards including the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
22. We do not practice and support child labour. Persons under the minimum statutory legal age cannot be employed. Young workers shall be employed for work that comply with the requirements of legal acts.
23. We respect freedom of association and the right to collective bargaining. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
24. Living wages are paid. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.
25. All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
26. Any kind of exploitation, including forced, coerced, bonded or compulsory labour and human trafficking are strictly prohibited. The employees must be free to leave their employment after reasonable notice as required by applicable law or contract. Employees must not be required to lodge deposits of money or identity papers with their employer.
27. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.
28. Working hours must comply with national laws. Working hours, excluding overtime, shall be defined by contract. All overtime shall be voluntary. Overtime shall be used responsibly and shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate. Working and rest time shall be determined by internal work regulations and followed as it is.

29. The Employees shall be treated with respect and dignity. All kinds of discrimination, in hiring or other employment practices, based on partiality or prejudice is prohibited.
30. Each employee has the right to be treated fairly, collegially and respectfully by his heads, subordinates and other employees performing the same or similar duties. The Company shall not tolerate any kind of discrimination and harassment on the basis of race, religion, beliefs, ethnic origin, gender, disability, age, etc. Competence of the employee and personal qualities (honesty, decency, etc.) are the key criteria based on which the Company shall make a decision on his/her employment.
31. The Company shall not tolerate political grounds, religion, sexual and private opinions as well as on marital or health situation or condition.
32. Equal pay for equal work is promoted by the Company.
33. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

WOMEN RIGHTS

34. Giving more attention to women in a company is not considered discrimination. The company celebrates 8 March, a day dedicated to women's solidarity.
35. There are no restrictions within the company that prevent women from holding managerial positions. Every staff member, regardless of sex, has the right to be treated fairly and with respect by his or her superiors, subordinates and other staff members performing the same or similar duties.
36. The salary for the post shall not be affected or reduced by the fact that the post is held by a woman.
37. Working conditions must be adapted for pregnant women and, where necessary, facilitated. The work performed by a pregnant woman must comply with the requirements of the Labour Code and not endanger the health or life of the woman or the foetus. Any physical work performed by a pregnant woman must be reviewed and adapted to her capabilities.
38. Women must have access to separate toilets, showers and changing rooms to ensure privacy in their working environment.
39. It is desirable to have at least one woman on the Labour Council and Safety and Health Committee to ensure women's equal participation and representation in labour, safety and health processes.

ETHICAL RECRUITING

40. The Company welcomes diversity in its workforce and seeks to ensure that all applicants are treated fairly and that they are recruited only on the basis of their abilities and qualifications.
41. Only the most suitable employees for the position shall be selected on the basis of their experience and qualifications. The selection process for new recruits shall be carried out systematically for all job offers at all levels. The selection criteria for all posts are clearly defined and detailed.
42. The Company's job advertisements are published on online job portals. Vacancy announcements shall be drafted in such a way that they do not give access to competition for a vacancy only to candidates of a particular gender, race, nationality, language, origin, social status, religion, belief or opinion, age, sexual orientation, disability, ethnicity, religion. The Company's job advertisements highlight the Company's commitment to equal opportunities.
43. Staff responsible for selecting, interviewing and appointing candidates shall be clearly informed of the selection criteria and the requirement to implement the equal opportunities policy. Whenever possible, at least two of the Company's recruitment staff shall be present at the interview with the candidate.
44. All questions asked of candidates for vacant posts shall relate to the selection criteria. The interviewing personnel shall not ask any questions about the candidate's gender, age, sexual orientation, social status, disability, race or ethnicity, religion, beliefs or faith, or make assumptions about the candidate's role in the home and family, insofar as these are not directly related to the application of the guarantees provided for in the Labour Code to the employee.
45. Candidates with disabilities who so indicate when applying for a vacancy will be provided with appropriate facilities during the interview process (e.g. easily accessible interview rooms or the assistance of a sign language interpreter) in order to ensure that such candidates are given equal opportunities with other candidates.

HEALTH AND SAFETY

46. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
47. Employees must be provided with appropriate health and safety information and training, including, but not limited to information on risks they are exposed to, arrangements for safe evacuations of buildings and correct handling and marking of chemicals and machinery.
48. The health and safety of the employees are one of priorities of the Company. A healthy and safe working environment must be provided for employees, in accordance with international standards and national laws.
49. The employer shall ensure regular estimation of risks in the workplace and shall take measures to achieve safe and healthy work, including, but not limited to:

- Employees including temporary workers and visitors must be provided with personal protective equipment for free.
- The Company shall ensure that all machinery and work equipment are suitable for purpose and properly maintained.
- All accidents, incidents and near-misses shall be recorded, significant events reported, investigated, and the findings shared in order to continually improve the health and safety performance.
- The Company shall take all measures to ensure emergency preparedness.
- The employer shall provide employees with ergonomic workplaces and shall openly accept their suggestions in order to practice good ergonomics in the workplace.
- Chemicals shall be used and stored in a place with a restricted access and it is accessible only to employees who have an appropriate knowledge to work with it.
- The Company shall ensure regular Fire Safety Risk Assessment and shall be prepared to react with appropriate measures in event of an accident.

ENVIRONMENTAL PROTECTION

50. The Company, as a stakeholder of the responsible business, undertakes to actively reduce its environmental impact, including regular measuring and evaluation of the impact on the environment. In order to reduce environmental impact in the most efficient way the Company shall constantly put reasonable efforts:
 - a. to reduce the amount of waste and promote recycling and waste sorting and where feasible repetitive use;
 - b. to optimize water consumption and reduce amount of waste materials in our wastewater;
 - c. to safe electric energy consumption and seek to use electric energy from renewable energy sources;
 - d. to reduce amounts of consumed gas and other natural resources;
 - e. to monitor air emission and implement modern technologies in order to reduce negative impact on the environment.
 - f. in case hazardous materials are used in the production it shall be done in accordance with the applicable legislation and hazardous waste are handled properly.
51. The Company has adopted ISO 14001 standard in order to ensure constant improvement of environmental efficiency.
52. The Company regularly identifies environmental issues, sets environmental targets and tasks which are incorporate into the general strategic and tactical plans of the Company. We regularly monitor the relevant results and audit processes in order to measure our activities against internal and external environmental standards.
53. The Company shall ensure that all the employees are adequately informed and trained on the issues related to the environmental requirements. Each employee must make all possible efforts to reduce the amount of waste and any other impact on the environment.

RELATION WITH THIRD PARTIES AND CONFLICT OF INTERESTS

54. Our relations with customers, partners and representatives of other institutions are based on respect, integrity, professionalism, mutual trust, justice, priority of customer interests, compliance with commitments, information sharing and the priority of negotiations against legal actions. We expect our business partners to share this view.
55. It is necessary to avoid the situations, where the conflict of interest between the employee's liability against the Company and/or the business partner and his/her private interests occurs. The employee must avoid any circumstances which might cause damage to the reputation of the Company or other material and immaterial interests of the Company.
56. We closely monitor where the goods are purchased from and our production is sold to. We aim to purchase products and services from ethical suppliers and ensure they only supply equally ethical consumers (whether B2C or B2B).
57. The Company respects and is committed to adhere to the applicable economic sanctions and export control regulations consistent with international norms and standards in the jurisdictions where it operates. The Company exercises due care in the screening of individuals and other entities in which it transacts to ensure it is not in breach of any economic sanctions and export regulations. Each new partner is checked in economic sanctions lists provided by authorities of European Union and United States. Shareholders of a potential business partners (e. g. stock owners, proprietors) are checked by using the internet links and the respective guidance or through a suitable compliance software in order to find out if it is not listed on: UN sanctions lists; on EU sanctions lists; as Specially Designated Nationals (SDN) by the U.S.; on the Sectoral Sanctions Identifications List (SSI) of the U.S. or on local sanctions lists applicable to the company. We are committed to complying with applicable export controls. Customs export trade laws require all exported goods to be accurately declared and the payment of duties and taxes, when applicable. When engaging in export activities, the Company must utilize accurate documentation, declare the proper valuation, along with commercial invoices and accurate transport waybills.
58. The Company seeks to work directly with the manufacturers of goods and maintain long-term relationships with them in order to prevent itself against usage of counterfeit parts.

CONTROL AND REPORTING

59. We expect our employees, representatives and business partners to comply with the CSR policy. The Company revises and updates the CSR policy from time to time.
60. Employees, business partners and its employees can report good faith concerns regarding suspected violations of applicable laws or CSR policy through *the Compliance line* of the Company by writing an email to the Compliance manager report@altasauto.com, via phone, No. +37069825442 or leave a note in the suggestions and complaints box.

61. Information about the *Compliance line* of the Company is available on the website of the Company at <http://www.altasauto.com>
62. We are committed to investigating all credible reports of potential compliance violations made in good faith.
63. The Company prohibits any discrimination or retaliation against individuals who report suspected violations in good faith.
64. The Company shall preserve the full confidentiality of the persons who reported the non-compliance to the norms of this CSR policy and ensure their protection as provided by laws.