UAB „Plieno Spektras“

Company code 142150178 | Dubysos g. 37A, LT-91181 Klaipeda, Lithuania

CODE OF CONDUCT

Code of Ethical Conduct and Business Principles

Version 1.0 | Approved: 01-07-2026

1. Introduction

This Code of Conduct (the „Code“) sets out the fundamental standards of ethical conduct and business practice at UAB „Plieno Spektras“. The Code applies to all employees, managers and members of the company's governing bodies, regardless of position or type of work.

The Code reflects our values and our commitment to acting honestly, responsibly and respectfully in all situations. Every employee is required to familiarise themselves with this Code and to comply with it.

2. Core Values

- Integrity and transparency – we act openly and honour our commitments;
- Respect – we respect colleagues, clients, partners and society;
- Responsibility – we take responsibility for our actions and their consequences;
- Quality – we strive for the highest quality in everything we do;
- Professionalism – we continuously improve and work competently.

3. Working Environment and Relationships

3.1. Respect and Non-Discrimination

We foster a working environment in which everyone feels respected and valued. We do not tolerate any discrimination, harassment or bullying based on age, gender, race, nationality, religion, disability, sexual orientation or any other grounds.

3.2. Occupational Health and Safety

Employee safety is a priority. Everyone must comply with health and safety rules, use personal protective equipment and immediately report hazardous situations or incidents.

3.3. Prohibition of Forced and Child Labour

We strictly prohibit forced labour, child labour and human trafficking in any form, both in our own operations and in our supply chain.

4. Business Ethics

4.1. Anti-Corruption and Anti-Bribery

We do not tolerate any form of corruption, bribery or improper payments. Employees may not offer, give, request or accept improper benefits, gifts or services that could influence decisions or create a conflict of interest.

4.2. Conflicts of Interest

Employees must avoid situations in which personal interests conflict with those of the company, and must promptly inform management of any potential conflict of interest.

4.3. Gifts and Hospitality

Gifts or hospitality may only be accepted or offered where they are modest, consistent with business ethics and cannot be regarded as an attempt to influence decisions.

4.4. Fair Competition

We compete fairly and in compliance with competition law. We do not tolerate unlawful agreements, abuse of position or unfair practices.

5. Compliance with Laws and Sanctions

- We comply with all applicable laws of the Republic of Lithuania and the European Union;
- We comply with international sanctions, including EU, US (OFAC) and UN requirements, and with export-control rules;
- We do not tolerate money laundering and take measures to prevent it;
- We work only with reliable partners who comply with the law.

6. Protection of Information and Assets

6.1. Confidentiality and Data Protection

We protect the confidential information of the company, its clients and partners, as well as personal data, in accordance with the GDPR and other legislation. Confidential information may not be disclosed or used for personal purposes.

6.2. Use of Company Assets

We use company assets, equipment and resources responsibly, for their intended purpose and only for legitimate business objectives.

6.3. Intellectual Property

We respect our own and others' intellectual property. Technical solutions, drawings and technologies created by the company are protected as company property.

7. Reporting of Violations

Employees are encouraged to report possible breaches of this Code or of the law to management or through the designated internal channel. The company does not tolerate any retaliation against those who report in good faith. Reports are handled confidentially.

8. Compliance with the Code

Failure to comply with this Code may result in disciplinary action and, in serious cases, termination of employment or legal liability. Every employee is responsible for complying with the Code in their work.

Approved by the management of the company.

Artūras Marcinkus, Director

01-07-2026, Klaipėda, Lithuania