

# Code of Conduct of



## CODE OF CONDUCT 2026

## Contents

|                                                                                                           |    |
|-----------------------------------------------------------------------------------------------------------|----|
| Introduction.....                                                                                         | 2  |
| Scope .....                                                                                               | 3  |
| General requirements in respect of conduct .....                                                          | 3  |
| Responsibility for the reputation of UAB Hi-Steel.....                                                    | 3  |
| Responsibility for the social basic rights and principles.....                                            | 3  |
| Equal opportunities and mutual respect.....                                                               | 3  |
| Employees and employee representation .....                                                               | 4  |
| Management culture and collaboration .....                                                                | 4  |
| Avoiding conflicts of interest and corruption.....                                                        | 4  |
| Conflicts of interest .....                                                                               | 4  |
| Sideline employment.....                                                                                  | 4  |
| Interests in other companies.....                                                                         | 5  |
| Combating corruption .....                                                                                | 5  |
| Regulations for handing out gifts .....                                                                   | 5  |
| Regulations for accepting gifts .....                                                                     | 6  |
| There are no exceptions to these regulations.....                                                         | 6  |
| Dealing with business partners and third parties .....                                                    | 6  |
| Fair competition .....                                                                                    | 6  |
| Dealing with donations and sponsoring.....                                                                | 6  |
| Safeguarding interests.....                                                                               | 6  |
| Laws and customs law .....                                                                                | 7  |
| Dealing with information .....                                                                            | 7  |
| Data protection and data security.....                                                                    | 7  |
| Secrecy.....                                                                                              | 7  |
| Work and health protection .....                                                                          | 8  |
| Environmental protection .....                                                                            | 8  |
| Protection and proper use of the property of UAB Hi-Steel and its customers.....                          | 9  |
| Applying the Code of Conduct.....                                                                         | 9  |
| Responsibility of suppliers for adequate implementation .....                                             | 9  |
| Responsibility for compliance .....                                                                       | 9  |
| Complaints in respect of compliance and implementation, Whistleblowing, Protection from retaliation ..... | 10 |

## Introduction

At UAB Hi-Steel, the introduction of the Code of Conduct set out below is a further consistent step towards accepting our global and local responsibility. In this context for the sake of public interest we undertake to shape the future with products that reflect individual requirements, ecological issues and economic demands. The company UAB Hi-Steel has set itself the goal of manufacturing products that meet customers' requirements and expectations. In that respect prime importance is attached to customer satisfaction. To that end methods, procedures and production facilities are used that are in line with the latest technological developments. All product development phases are carefully planned. In that respect, we comply with current standards, sets of agreements and statutory requirements. The statutory environmental protection regulations are our minimum requirement in that respect.

To achieve our goal

- We act responsibly for the benefit of our customers and employees,
- We consider compliance with international conventions, laws and internal regulations as the basis for sustainable, successful, economic operations,
- We act in line with our statements,
- We assume responsibility for our actions.

In addition to international conventions, laws and internal regulations, our actions are also based on our company values. The company values "customer proximity, maximum output, respect, responsibility and sustainability" form the basis of our collaboration and have been incorporated in our Code of Conduct.

By way of our Code of Conduct we are giving our employees a guideline that largely summarises the key basic principles of our actions and supports our employees in meeting the legal and ethical challenges of their daily work. The Code of Conduct constitutes a company-wide guiding principle that applies to all employees. Each individual employee is equally responsible for complying with the Code of Conduct. We stand for respectable and honest conduct in line with the regulations in day-to-day business operations and are committed to the Code of Conduct below.

Dainius Volskis



## Scope

The Code of Conduct applies to UAB Hi-Steel and specifies the fundamental principles. The subsidiary companies may issue their own Code of Conduct provided they are not contrary to the Code of Conduct of the parent company. When issuing an own Code of Conduct, the subsidiaries are to take into consideration corresponding involvement by the employee representatives.

## General requirements in respect of conduct

### Responsibility for the reputation of UAB Hi-Steel

The reputation of UAB Hi-Steel is largely characterised by the manner, actions and conduct of each individual employee. Inappropriate conduct by even a single employee can in itself seriously damage the company's reputation. Every employee is to ensure that their manner in public does not damage the reputation of UAB Hi-Steel. The way in which they perform their tasks must be geared towards this in all respects.

By responsible implementation of work content, we also accept financial responsibility for all actions. From our point of view, this includes "dumping prices" in offers, false components ("fake parts") in the context of purchased parts and "cheap offers" from suppliers. For this reason, internal guidelines have been drawn to counteract these issues. This includes agreements with customers and offer comparison.

### Responsibility for the social basic rights and principles

We respect the internationally-recognised human rights and support compliance with these. Our actions are based on the relevant requirements of the International Labour Organization. We acknowledge the basic right of all employees to establish trade unions and employee representation. We reject any wilful use of forced or compulsory labour. Child labour is prohibited. We comply with the minimum age for employment in accordance with the government obligations. The remuneration and services that are paid or rendered for the normal working week comply at least with the respective, national, statutory minimum standards or the minimum standards of the respective national economic sectors. The working hours correspond to the national legal requirements.

### Equal opportunities and mutual respect

We provide equal opportunities and equal treatment irrespective of ethnic origin, skin colour, sex, disability, ideology, religion, citizenship, sexual orientation, social origin or political views provided these are based on democratic principles and tolerance towards those who hold different views. As a matter of principle, our employees are selected, appointed and promoted on the basis of their qualification and capabilities. Every employee undertakes to refrain from any kind of discrimination (e.g. by way of discrimination, harassment or mobbing) and facilitate co-operation characterised by respect and partnership.

For this reason we would similarly like to draw attention to the fact that we use unisexual terms exclusively for the sake of better clarity in all documents, Social Media, activities or public

statements. We do this without discriminating against any group of persons and at all times mean male, female as well as other genders.

### Employees and employee representation

We create an environment that provides personal and occupational perspectives so that our employees can render outstanding services and obtain outstanding results. That environment also nurtures the employability of our staff. We invest in the qualification and skills of our employees. At the same time we expect that all our employees place high demands on themselves, their performance and health, and play an active role in their further development. We are committed to collaborating with employee representatives in a manner characterised by openness and trust, entering into constructive and co-operative dialogue and working towards a fair balance of interests. A professional approach to employee representation that is neither preferential nor discriminatory is part of our company culture.

### Management culture and collaboration

Every superior is responsible for their employees. Every superior should lead by example and base their actions, in particular, on the Code of Conduct. By way of furnishing regular information about and clarifying the obligations and powers relevant to the work area, superiors promote conduct of their employees in line with the regulations. Superiors place trust in their employees, agree on clear, ambitious and realistic goals and grant their employees as much own responsibility and freedom as possible. Superiors pay attention to the performance of their employees and acknowledge performance. They particularly appreciate maximum performance. As part of the management task, superiors prevent unacceptable conduct. They ensure that there are no violations of regulations in their area of responsibility that could have been prevented, or hampered, by way of appropriate supervision. Successful collaboration characterised by trust thrives amid mutual and open information and support. Superiors and employees inform each other in full of facts and operational contexts so that they can act and decide. Employees and, in particular, superiors ensure that information is exchanged quickly and smoothly. To promote collaboration, knowledge and information are to be forwarded without alteration, in a timely manner and in full as part of the given powers.

## Avoiding conflicts of interest and corruption

### Conflicts of interest

We attach importance to our employees not facing conflicts between their private interest and those of UAB Hi-Steel. Therefore, any situation that could result in a conflict of interest is to be avoided. Any type of corruption or prohibited agreements are strictly rejected.

### Sideline employment

Every employee undertakes to make their working capacity available and perform the tasks assigned to them to the best of their knowledge and ability. Sidelined employment that has a detrimental effect

on this obligation is not permitted. We support and promote honorary activities on the part of our employees.

### Interests in other companies

Every employee who is involved in companies that maintain business relations with UAB Hi-Steel, or works or renders services for these, is to report such activity independently to the Personnel Department or another relevant department. In the event of a risk of a conflict of interests, such involvement is to cease.

### Combating corruption

By way of the goal of a successful and sustainable business activity, we have a winning strategy in the market in the form of the quality and lasting value of our products and services. We support the national and international efforts of not influencing competition by way of bribery or falsifying information, and reject any corrupt conduct that has a detrimental effect on the company. None of our employees may exploit the business connections of the company for their own or third party benefit, or to the disadvantage of the company. This means, in particular, that in business dealings none of our employees grants or accepts unauthorised advantages (e.g. money, material assets or services) that are capable of influencing an appropriate decision. To avoid legal consequences for UAB Hi-Steel, for involved business partners but also for themselves, each employee should obtain information at their own responsibility about internal regulations before handing out or accepting gifts, or extending or accepting invitations or entertainment. Every employee undertakes to seek advice or assistance in the event of suspicious circumstances or legal doubt regarding the existence of corruption or white collar crime. Supervisors and the relevant internal specialist departments (e.g. Personnel Department) provide advice or assistance. In addition, all employee can also contact the Works Council.

### Regulations for handing out gifts

Promotional and courtesy gifts in the form of objects of material value with a low value (< €50/year/person) may be awarded to business partners. Approval is provided and responsibility is held by the respective heads of department. The names of the recipients must be indicated on the receipts submitted to the Accounts department. If possible, when giving a gratuity, it should be recognisable (e.g. due to logos, cards etc.) that the gratuity is from UAB Hi-STEEL.

Exceptions to these regulations are only possible if the company's management approves them in writing.

### Regulations for accepting gifts

Promotional and courtesy gifts in the form of objects of material value with a low value (< €50/year/person) may be received by any employee. The respective head of department must be informed of the receipt of a gratuity.

There are no exceptions to these regulations.

**Comment:** The company's management recommends that any gifts received be submitted as prizes in the Christmas raffle which takes place each year, so that all employees benefit from them.

## Dealing with business partners and third parties

### Fair competition

We are committed to fair dealings with our business partners and third parties, and support fair and unadulterated competition by way of complying with competition and cartel law. Every employee undertakes to comply with the competition and cartel law regulations. This means, for example, that none of our employees conducts discussions with competitors in which prices or capacities are agreed. Similarly, agreements with business partners and third parties regarding the waiving of competition, making sham offers in tenders or distributing customers, territories or production programmes are not permitted. Inappropriate preferential treatment or the exclusion of contracting parties are not permitted. Furthermore, we expect our business partners to act in full at their own responsibility to guarantee fair competition.

### Dealing with donations and sponsoring

We make donations, i.e. allowances on a voluntary basis without expecting counter-performance, and provide sponsorship money, only in line with the respective legal system and in compliance with the internal regulations that apply in that respect. We donate money and give contributions in kind for science and education, culture and sport and for social issues. We make donations only to recognised charitable organisations, or those that are authorised to accept donations as a result of special regulations. Donations are made transparently. The purpose, donation recipient and confirmation of the donation by the donation recipient are documented and verifiable. None of our employees makes donations that could damage the reputation of UAB Hi-Steel. Every employee who intends to make sponsoring arrangements is to approach the relevant company departments (e.g. Sales) in advance.

### Safeguarding interests

We safeguard our interests, and advertise accordingly, as a company and members of society. In that respect we incorporate the wishes and requirements of various interest groups in our considerations. We respect and follow the principles of freedom of expression, the principles of the right to obtain information, the independence of the media and protection of personal rights. Every employee is to ensure that their manner and expression of opinions in public do not damage the reputation of UAB Hi-Steel. In the case of expressing opinions, employees should refrain from referring to their own position or activity at the company. Every employee is to only use honest and legal means to

communicate and realise interests. We all undertake to state the truth in dealings with political institutions, the media and the public. Every employee is to respect the performance of their partners in a discussion and respect their professional standing and personal appearance.

#### [Laws and customs law](#)

We analyze our duties according to our created and constantly updated legal cadastre and determine the necessary measures based on it.

Our goods clearance partner ensures that the current legal situation (with regard to the valid export controls and any associated economic sanctions) is complied with.

If, for any reason, there are official requirements or instructions, these will be implemented by mutual agreement. If official instructions require the deployment of official or private emergency and security forces, we will actively cooperate.

## **Dealing with information**

#### [Data protection and data security](#)

Protecting confidential, secret and personal data ranks among the principles on the basis of which we organise our relations with our employees (including former employees) and their relatives, applicants, customers, suppliers and other groups of persons. We collect, process or use personal data only provided this is necessary for specified, clear and lawful purposes. We ensure that the use of data is transparent for the data subjects, and that their rights in respect of obtaining information and rectification and, where applicable, objecting, blocking and erasure are safeguarded. Every employee undertakes to comply with the data protection law provisions and the statutory and company regulations regarding information security, and to protect the confidential, secret and personal data entrusted to UAB Hi-Steel against misuse. We undertake to guarantee an appropriate standard in respect of securing the processing of information. All aspects of information processing must be secure to an extent that confidentiality, integrity, availability and verifiability of the information worthy of protection are guaranteed, and unauthorised internal and external use is prevented.

#### [Secrecy](#)

Every employee undertakes to maintain secrecy regarding business and company secrets entrusted to them as part of their professional activity, or of which they otherwise gain knowledge. Secrecy is to be maintained regarding work and procedures at the company that are key to UAB Hi-Steel or its business partners, and have not been placed in the public domain, e.g. in respect of developments, planning and trials.



## **Work and health protection**

We accept our responsibility for the health and safety of our employees. We guarantee work and health protection as part of the respective valid national provisions and on the basis of the health and safety policies in place at UAB Hi-Steel. We maintain and promote the health, efficiency and work satisfaction of our employees by way of continually improving the working environment and a variety of preventive and health-promoting measures. Every employee is to play a part in promoting their health, and is to comply with the work and health protection requirements.

## **Environmental protection**

Within the scope of our business operations, we take into account all legal and official requirements and conditions. This includes all applicable land, forest and water rights. On the basis of our legal framework, all influencing factors, such as noise, immissions, emissions (noise, air, water, production environment, soil quality) are analysed and taken into account in accordance with the requirements and specifications and, if possible, avoided. We also take into account issues that are of moral origin and not a legal requirement, such as biodiversity conservation and animal welfare, the lowest possible land use or the avoidance of deforestation. In the event of violations of safety and/or environmental regulations (e.g. violations of land, water, air rights), we agree to the necessary evictions in the event of official orders.

We are responsible for the continual improvement of the environmental-compatibility of our products or processes, and reducing the strain placed on natural resources with consideration given to economic aspects. We therefore use environmentally-efficient and progressive technologies. To that end energetic and other environmentally-relevant aspects and criteria are evaluated as part of acquisitions and the selection of bought-in materials. UAB HISTEEL is committed to reduce energy consumption and emission of gases, which cause greenhouse effect, also reduce violations of water and air quality to the absolute minimum and improve water and air quality.

With regard to the organisation of a socially and ecologically sustainable, positive, development, we engage as partners for society and politics at all locations. Every one of our employees is to use the natural resources expediently and economically, and ensure that their activities exert only the least possible influence on the environment.

### **Water quality**

Avoiding water pollution is an understandable course for us. All used water generated by the company is properly removed according to national laws. Removal via sewerage system or into open waters is strictly prohibited.

### **Air quality**

While purchasing new equipment, proper care is taken to avoid air emissions. Air emission that cannot be avoided are filtered out or neutralized. The company does not release any harmful air emissions into the environment.

#### Chemical management

Chemical and harmful substances are avoided in the company whenever is possible. Chemicals that have to be used in our production processes are used responsibly. This kind of materials are stored in accordance with national laws and safe work regulations and disposed of after usage. Handling of harmful substances corresponds to the national legal requirements. Employees are regularly trained on how to handle chemicals.

### **Protection and proper use of the property of UAB Hi-Steel and its customers**

Every employee is to use the property of UAB Hi-Steel, and that of our customers, for business purposes only provided special regulations do not permit private use. Every employee is to treat the property of UAB Hi-Steel and its customers appropriately and with due care and protect it against loss or destruction.

### **Applying the Code of Conduct**

#### [Responsibility of suppliers for adequate implementation](#)

The manner in which we prepare contacts with our suppliers means they undertake to implement this Code of Conduct accordingly in their own operations and apply it to their suppliers. In this respect the country-specific laws are to be supplemented and incorporated by way of analogy with the individual points of this Code of Conduct.

#### [Responsibility for compliance](#)

Each employee is to comply with the relevant laws and requirements, as well as internal regulations, which apply to their working environment, and shall take the company values and Code of Conduct as a basis for their actions. Every one of our employees who fails to act in line with the regulations must expect appropriate consequences as part of the company and statutory regulations, which may include termination of the employment relations and claims for damages. Each superior is to ensure that the employees in their division are aware of and comply with the Code of Conduct.

## Complaints in respect of compliance and implementation, Whistleblowing, Protection from retaliation

Complaints in the case of failure to comply in part or in full with this Code of Conduct as well any other kind of complaints may be made by any person directly to our management or the employee representatives.

All people who wish to stay anonymous with their complaints are assured of this at this point (applies to the principles of the EU Whistleblowing Directive).

In each case of a complaint, it is assured that person will not experience any form of retaliation (e.g. termination of work agreement, termination of supply contracts and etc.).

Therefore: Dare to point out violations.