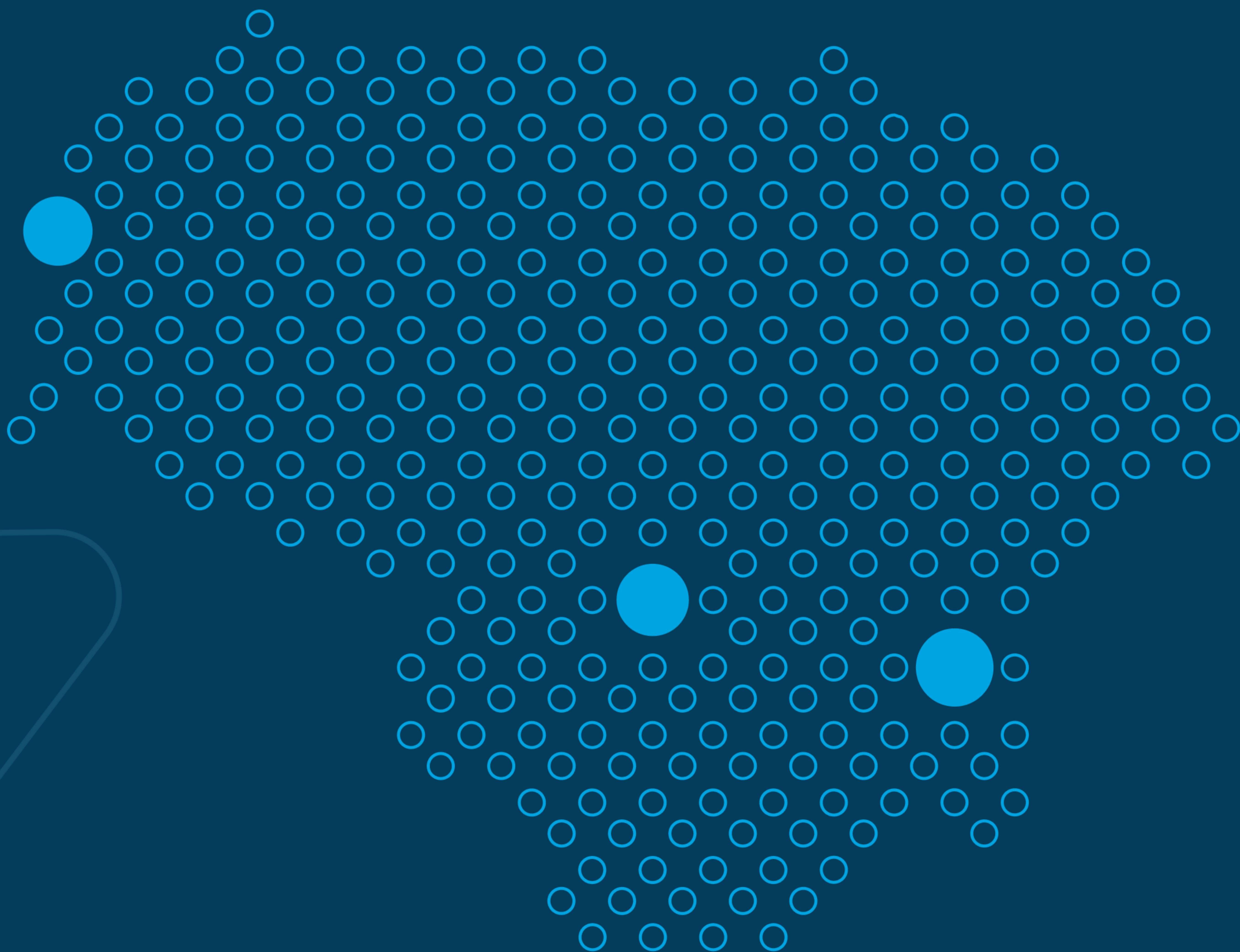


CODE OF ETHICS FOR THE OPERATING PARTNERS OF LITHUANIAN AIRPORTS

APPROVED

By Order No

of the General Director of
Lithuanian Airports



1. GENERAL PART

1.1. This Code of Ethics for the Operating Partners of Lithuanian Airports (hereinafter – the Code of Ethics) applies to the Operating Partners of Lithuanian Airports (hereinafter – LA).

1.2. Operating Partner – a natural person, legal entity, or any other entity that supplies goods, services, works or leases of LA assets, as well as partners, suppliers, subcontractors of the Operating Partner.

1.3. LA commits to be open and impartial to the Operating Partners in creating an attractive business environment and allows to implement mutually beneficial business models as well as encouraging the Operating Partners to adhere to their values – creativity, trust, and ownership.

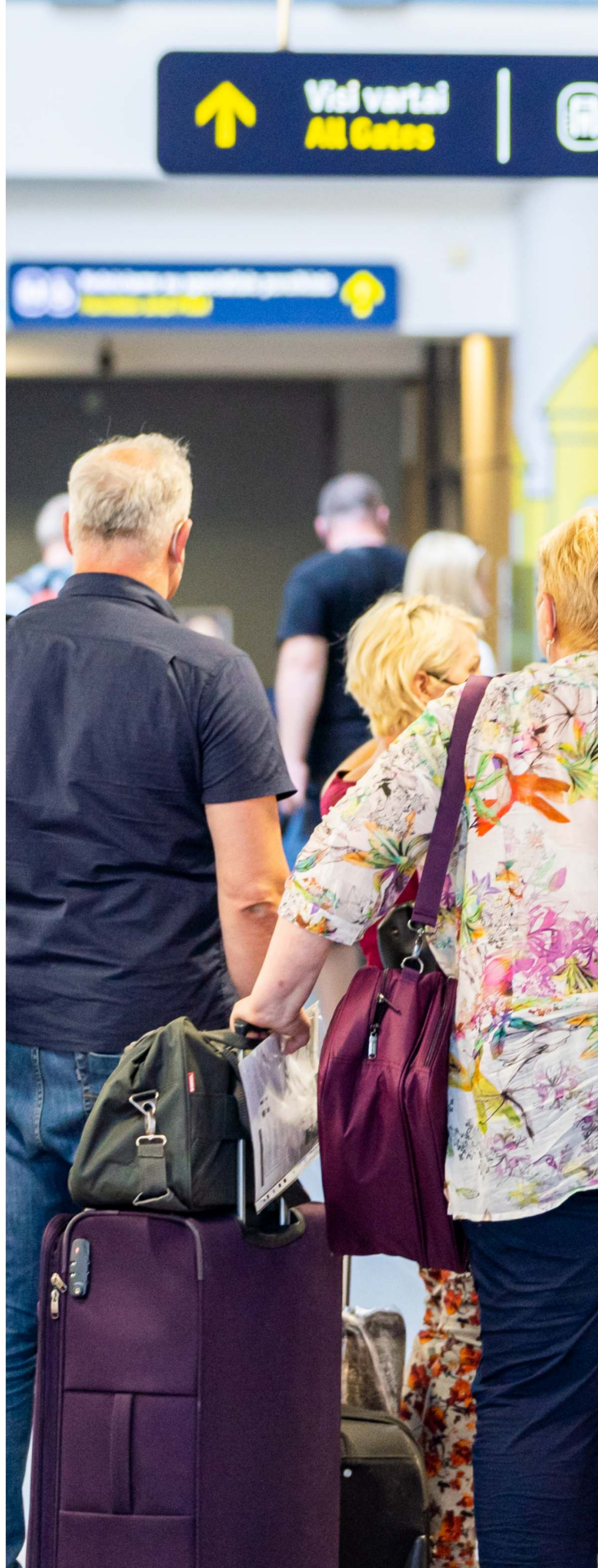
1.4. The aim – to set out in this Code of Ethics the provisions of conduct of the Operating Partners, compliance with which will help create preconditions and conditions for the implementation of the highest standards of business ethics.

1.5. Application – the Code of Ethics applies to all Operating Partners, and its application and implementation depends on mutual cooperation and trust between each of the Operating Partners and LA.

2. SELECTION OF AN OPERATING PARTNER

2.1. Operating Partners are selected on the basis of legal provisions. In the case of exceptions, to ensure compliance with the principles of equal treatment and competition, the selection of the Operating Partners is carried out in accordance with the general principles of justice, reasonableness, and fairness established by LA in accordance with other applicable legislation.

2.2. Operating Partners must comply with the legislation, standards, and good practices applicable to their activities. If during a specific procurement/competition the Operating Partners and/or their partners are asked to comply with specific operational standards, the Operating Partners must ensure that they are complied with during the duration of the agreement.



3. SAFETY AND SECURITY

3.1. Operating Partners must comply with the security culture and procedures fostered by LA, including the essential elements of the safety management system, and, in the event of an incident, act in accordance with the planned situation management plans, implementing the instructions of LA.

3.2. Operating Partners undertake to report safety incidents and protect the reporting persons as provided for in the safety management system of each Airport manager.

3.3. Operating Partners undertake to store the information entrusted to them and to process it in accordance with the procedure laid down in legal acts and LA information security documents, to comply with cybersecurity requirements and, in the event of any information security incident, to provide information immediately by email: itpagalba@ltou.lt

3.4. In the field of personal data protection, Operating Partners must:

- ensure technical and organisational security requirements specified in LA's personal data protection policy, which is published on the Company's website;
- protect the secret of personal data received from LA and not disclose them to third parties. Personal data that has become known in the performance of the functions defined in the contract must be used exclusively for purposes related to those functions, and must not be used for personal, financial gain. If the Business Partner notices or suspects the processing of personal data that violates the principles of personal data protection or excessive access rights to personal data that they do not need to perform direct functions, they must inform the personal data protection officer appointed by LA by email dap@ltou.lt





4. ENVIRONMENTAL PROTECTION

4.1. Operating Partners must carry out their activities in accordance with the provisions of environmental legislation.

4.2. LA hopes that in their activities Operating Partners ensure responsible and continuous environmental assessment and improvement by applying efficient environmental management systems or environmental management standards based on international standards.

4.3. LA hopes that in their activities Operating Partners aim to avoid pollutant emissions to air, water and soil and undertake to take all necessary measures to reduce toxic and resistant chemicals, energy and natural resources, including water consumption.

4.4. LA encourages Operating Partners to identify, monitor, and reduce greenhouse gas emissions and energy consumption during their operations and to take all necessary actions to reduce the impact on climate change.

4.5. LA hopes that Operating Partners support the concept of circular economy, responsibly use natural resources, ensure proper waste management, and adhere to the principles of the waste management hierarchy in order to minimise the amount of waste to be landfilled.

4.6. LA encourages Operating Partners to take responsibility and strive to minimise the environmental impact of the provided goods, services or works in one, several, or all stages of the life cycle of goods, services, or works.

4.7. LA encourages Operating Partners to develop and promote a culture that assesses the importance of environmental impact, promotes greater responsibility for the environment and implements measures to protect the environment in which they operate.

5. HUMAN RIGHTS

5.1. Operating Partners respect the following principles in the areas of human rights and labour rights:

- Operating Partners respect and do not violate internationally recognised human rights;
- Operating Partners do not use compulsory or forced labour;
- Operating Partners do not use child labour and seek to contribute to the destruction of child labour in an environment in which they can influence;
- Operating Partners do not discriminate and advocate equal rights for workers and equal opportunities at work regardless of gender, ethnic origin, race, nationality, social status, age, disability, religious beliefs, political opinions, or sexual orientation. Operating Partners also aim to contribute to the elimination of discrimination against workers, customers, and other stakeholders in an environment in which they can influence;
- Operating Partners must take care of the health of all their employees and provide them with safe working conditions and safe workplaces.

5.2. Operating Partners shall ensure that working conditions in their activities comply with the applicable legislation of the European Union and the Republic of Lithuania and ensure safe and attractive working conditions in relation to minimum wages, working hours, rest, leave, occupational safety and health, maternity/paternity protection, and an adequate work-life balance.

5.3. Operating Partners ensure that there is zero tolerance for alcohol and drug use in the workplace.



6. TRANSPARENCY

6.1. Operating Partners undertake not to tolerate any corruption or other unfair activities between them, as well as such activities with clients, partners, institutions, organisations, and other persons of Lithuanian and foreign countries.

6.2. Operating Partners must seek and make reasonable efforts to ensure that the transparency requirements and principles laid down also apply to partners, suppliers, and subcontractors of the Operating Partners.

6.3. Operating Partners must ensure that sufficient procedures are in place in their activities to avoid potential conflicts of interest and to ensure that business transaction reports and registers are kept accurately.

6.4. Operating Partners undertake to immediately report any possible illegal activity, violation of the law, unethical, unfair conduct, or conflict of interest of which they are aware by email pranesk@ltou.lt or other means indicated on the LA website.

6.5. Operating Partners do not tolerate any negative actions against their employees who report violations and guarantee the safety of those who report violations.

6.6. Operating Partners do not participate in any form of unlawful agreements or other mechanisms that restrict fair competition, do not enter into any form of cartel agreements that may affect prices, transaction conditions, operational strategies, participation, non-participation in tenders/purchases.

6.7. Operating Partners must make reasonable efforts to ensure that their employees adhere to the Zero Gift Policy and do not offer any gifts if such gifts are aimed at unfairly securing an advantage or bias in the decisions of the recipient vis-à-vis the Operating Partners.

6.8. Operating Partners must comply with the legal requirements regarding the provision of support and/or charity. Support and charitable measures may not be used for disguised promotion of interests. Support or charity shall be provided in accordance with the principles of transparency, impartiality, expediency, publicity, social responsibility.

6.9. Operating Partners must take all necessary measures to prevent direct or indirect terrorism, the financing of armed groups, etc.



7. FINAL PROVISIONS

7.1. The Operating Partner, when providing goods, services, or works, as well as performing the activities of LA, undertakes to comply with the provisions specified in the Code of Ethics. LA expects that the Operating Partners will encourage its partners, suppliers, and subcontractors to comply with the requirements set out in the Code of Ethics.

7.2. When the Operating Partner sees the risks that may arise from the compatibility of its activities with the Code of Ethics, immediately contact the representatives of LA and indicate all the circumstances and seek a joint decision. Email for enquiries: darnumas@ltou.lt

7.3. Any exceptions to the provisions of the Code of Ethics must be considered individually, in the form of separate agreements or in contracts for goods, services, works, activities or rentals.

7.4. The representatives of LA shall have the right to verify and supervise the compliance of Operating Partners with the provisions specified in the Code of Ethics. Operating Partners may be requested to provide additional information or reports related to compliance with these provisions for further assessment or audit.

7.5. LA reserves the right to apply sanctions in accordance with the procedure laid down by law in the case of established criminal offences and/or if Operating Partners have not taken appropriate actions to eliminate the violations within the prescribed period. This may result in the termination, suspension of all or part of the legal relationship with the Operating Partners, as well as termination of the contract or contracts, a claim for damages.

7.6. The provisions of this Code of Ethics may also be kept under constant review and updated in the light of changing legal regulations or any other relevant circumstances.

