



UAB GBY EQUAL OPPORTUNITIES POLICY

I CHAPTER GENERAL PROVISIONS

1. The aim of the Equal Opportunities Policy of UAB GBY (hereinafter referred to as “the Company”) is to regulate the equal opportunities policy in the Company, to ensure that the provisions of the Constitution of the Republic of Lithuania, the Law on Equal Opportunities of the Republic of Lithuania and other legal acts establishing the implementation of the principles of equal rights of persons, equal opportunities and nondiscrimination, by developing tolerance in the company, by prohibiting the restriction of the rights of persons and the provision of privileges to them.

2. Key concepts of the Company’s equal opportunities policy:

2.1. Company, employer - **UAB GBY**;

2.2. Employee – a person who works in **the Company, UAB GBY**, under an employment contract;

2.3. **Discrimination** – direct or indirect discrimination, harassment, instruction to discriminate persons on the basis of their gender, race, nationality, language, origin, social status, belief, opinion, age, sexual orientation, disability, ethnicity and religion.

2.4. **Ethos** – a set of beliefs, values, moral attitudes and traditions that determine the behaviour or norms of a person or group of persons;

2.5. **Direct discrimination** – treatment of a person who, on the grounds of their gender, race, nationality, language, origin, social status, belief, opinion, age, sexual orientation, disability, ethnicity and religion, is subject to less favorable conditions than other person was/is/would be in comparable circumstances, except:

2.6. **Indirect discrimination** – action or inaction, legal norm or a valuation criterion, apparently neutral condition or practice, which is all formally identical but the actual exercise or application of such rights creates or may give rise to actual restrictions on rights or granting of privileges, preferences or superiority to gender, race, nationality, language, origin, social status, belief, opinion, age, sexual orientation, disability, ethnicity and religion, unless this action or inaction, legal norm or a valuation criterion, condition or practice is justified by a legitimate objectives and the means of achieving those objectives are appropriate and necessary.

2.7. **Equal opportunities** – implementation of human rights enshrined in international human and citizen's rights instruments and laws of the Republic of Lithuania with regards to gender, race, nationality, language, origin, social status, belief, opinion, age, sexual orientation, disability, ethnicity and religion.

2.8. Harassment – unwanted behavior where gender, race, nationality, language, origin, social status, belief, opinion, age, sexual orientation, disability, ethnicity and religion is aimed to offend or insult personal dignity and seek to create or develop an intimidating, hostile, degrading, humiliating or offensive environment.

2.9. **Sexual harassment** – unwanted abusive conduct of a sexual nature, whether verbal, written or physical, towards a person, where such conduct is motivated by the intention or effect of such conduct to violate the dignity of a person, in particular by creating an intimidating, hostile, degrading or offensive environment;

2.10. other terms used in the document correspond to the terms used in the Law on Equal Opportunities of the Republic of Lithuania and the Law on Equal Opportunities for Women and Men of the Republic of Lithuania.

II CHAPTER RESPONSIBILITIES FOR EQUAL OPPORTUNITIES AT WORK

3. The Company aims to have a workforce that represents all sections of society and to ensure that every employee feels respected and able to use his or her full potential.

4. Recruitment is based on job vacancies, suitability, ability to perform work functions, and information received from candidates will only relate to qualifications associated with the work requirements.

5. The Company is committed to creating an environment where the individual differences and contributions of all its employees are recognised and valued. Every employee has the right to work in an environment that promotes respect towards dignity of every person.

6. The Company, in implementing the principles of equality of persons, equal opportunities and non-discrimination, must:

6.1. make job adverts that do not restrict access to candidates of a particular gender, age, sexual orientation, social status, disability, race or ethnic origin, nationality, religion, belief or faith;

6.2. ensure that all local laws and regulations provide for equal rights and opportunities regardless of gender, race, nationality, citizenship, language, origin, social status, faith, belief or opinion, age, sexual orientation, disability, ethnicity, religion or any other legal ground;

6.3. apply uniform selection criteria and conditions for recruitment. All questions asked to candidates of vacancies must relate to the selection criteria. The interviewing personnel may not ask questions regarding candidate's gender, race, nationality, language, origin, social status, belief, opinion, age, sexual orientation, disability, ethnicity and religion, or to make assumptions towards the candidate's role in home and family, insofar as this is not directly related to the application of the guarantees for an employee provided by the Labor Code of the Republic of Lithuania.

6.4. create equal working conditions, opportunities for further training, professional development, retraining, obtaining practical work experience, education, skills development and equal benefits;

6.5. apply the same motivational and incentive measures, regardless of the sex of the worker, as well as the same statutory criteria for the award of bonuses, incentives and allowances to men and women, based on competences, skills and performance; apply the same criteria for performance appraisal and dismissal;

6.6. equally pay for work of equal value;

6.7. take measures to prevent any harassment, sexual harassment and discrimination, or instructions to discriminate in the workplace, as well as to prevent prosecution and protect against adverse treatment or adverse consequences in the event of a complaint against discrimination or participation in a case of discrimination.

6.8. apply the same flexible working arrangements to both genders: teleworking, individual working time schedules, part-time working arrangements and other measures;

6.9. encourage both genders to take advantage of additional benefits: raising awareness of the right of men and women to benefit from social security, encouraging workers of both genders with children to take advantage of the legal and workplace benefits, and informing them about the procedures for accessing benefits;

6.10. take appropriate measures to enable disabled people to access employment, work, careers or training, including reasonable accommodation, provided that such measures do not result in a disproportionate burden on the employer;

6.11. introduce the possibility to report anonymously a possible case of sexual harassment or discrimination in the workplace;

6.12. ensure the confidentiality of the person making the complaint and the data concerning possible violations of gender equality;

6.13. ensure that the law is applied to those to whom it is differentially applied in order to achieve positive, socially relevant objectives.

7. The remuneration of specific employees of the Company is based exclusively on objective criteria relating to the qualifications of the employee, the degree of responsibility assigned to the employee, the nature of the work to be performed, the results achieved and other objective criteria.

8. The criteria used to select candidates for promotion relate exclusively to the individual's ability and quality of work and personal professional achievement.

III CHAPTER EMPLOYEES' DUTIES IN IMPLEMENTING EQUAL OPPORTUNITIES AT WORK

9. In implementing the principles of equality of persons, equal opportunities and non-discrimination, employees must:

9.1. not discriminate against, harass, ridicule or intimidate other employees on the basis of their sex, race, nationality, language, origin, social status, faith, beliefs or opinions, age, sexual orientation, disability, ethnicity, nationality, or religion, and not to victimise or take any other form of reprisal or other action against any such employee who makes unfounded allegations;

9.2. not to violate human rights and dignity, not to discriminate against a person on the grounds of sex, race, nationality, citizenship, language, origin, social status, faith, beliefs or opinions, age, sexual orientation, disability, ethnicity, religion, or any other grounds provided for by law;

9.3. not to restrict each other's rights or grant privileges on grounds of sex, origin, language, social status, religion, age, beliefs or opinions;

9.4. create a working atmosphere of trust and confidence in each other in the Company;

9.5. treat all employees with respect and fairness;

9.6. treat all customers equally;

9.7. objectively assess subordinates' qualities and performance;

9.8. inform the Company's manager about cases of discrimination, harassment, sexual harassment against employees and customers.

10. The following is considered unacceptable conduct by an employee of the Company:

10.1. sexual harassment;

10.2. harassment;

10.3. abusive language;

10.4. racial, ethnic, sexual or religious references;

10.5. humiliating or insulting a person;

10.6. incitement to discord;

10.7. intimidating or threatening behaviour;

10.8. hostility towards others because of personal characteristics;

10.9. other behaviour that discriminates against people.

IV CHAPTER VIOLATION OF EQUAL OPPORTUNITIES POLICY

11. An employee who believes that his/her equal opportunities have been violated has the right to report through the Employer's reporting channels - Transparency Line, available at www.gby.lt/skaidrumolinija or the Reporting Channel, available at www.gby.lt/pranesimukanalas and/or by contacting the Equal Opportunities Ombudsman's Office (address: Gedimino g. 11, LT-01103, Vilnius, Tel.: 8 52 727 719; mob. tel.: 8 706 63899; lygybe@lygybe.lt).

12. Upon receipt of an employee's complaint, the Employer shall deal with the report in accordance with the approved procedures for dealing with complaints from the reporting channels - the Procedure for dealing with reports received by the GBY Transparency Line, or the UAB GBY Procedure for submitting and examining the Law on Whistleblower Protection of the Republic of Lithuania.

13. Employees who have suffered discrimination have the right to claim compensation for material and non-material damage from the persons responsible, in accordance with the procedures laid down by law.

14. Employees who complain about discrimination or who are involved in a discrimination case, their representative or a person who testifies and gives explanations about discrimination may not be subject to harassment or adverse employment consequences.

**V CHAPTER
FINAL PROVISIONS**

15. The Equal Opportunities Policy applies to all «imones_tipas» employees from the date of its approval.

16. This document and/or any amendments thereto shall be communicated to employees either by signature or by electronic means.

17. Failure to comply with the Equal Opportunities Policy is considered a serious breach of an employee's employment duties, which may lead to termination of employment.

18. The Company shall have the right to amend this policy in part or in full.

APPROVED BY
UAB GBY Director, 20.11.2024