Approved By:
Director of Gridinta UAB
4th of October, 2019, Procedure Nr.P1-3

GRIDINTA UAB
PROCEDURE FOR THE IMPLEMENTATION AND ENFORCEMENT OF EQUAL OPPORTUNITIES (NON-DISCRIMINATION) POLICY

1. GENERAL PROVISIONS

1.1. Gridinta UAB, legal entity code 304722729 (hereinafter - the Company), Procedures for the Implementation and Enforcement of Equal Opportunities (Non-Discrimination) Policy (hereinafter - the Procedure) establishes provisions for the implementation of the principles of equal opportunities (non-discrimination) in the Company.

1.2. The procedure is prepared in accordance with Article 26 of the Labor Code of the Republic of Lithuania, the Law on Equal Opportunities, the Law on Equal Opportunities for Women and Men and other regulatory enactments that establishes gender equality and prohibits to restrict human rights on discriminatory grounds.

1.3. The purpose of the policy is to ensure that, during the recruitment process, the employment as well as the termination of employment process, the Company complies with the principle of equal opportunities and prohibits restrictions of workers' rights or extension of privileges on the grounds of gender, race, nationality, origin, language, social status, religion, convictions or views, age, sexual orientation, disability, ethnicity, etc,.

2. DEFINITIONS

2.1. **Equal Opportunities** means the implementation of human rights enshrined in the international human rights instruments as well as in the laws of the Republic of Lithuania, irrespective of gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion.

2.2. **Discrimination** is direct or indirect discrimination, harassment, instruction to discriminate on the grounds of gender, race, nationality, language, origin, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion.

2.3. **Direct discrimination** is a behavior that results in situation where one person is treated less favorably than the other is, has been or would be treated in a comparable situation on the grounds of gender, race, nationality, language, origin, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion except for when the applicable restrictions, prohibitions or requirements are applied to a person by law and / or the restrictions, prohibitions or requirements pursue a legitimate aim in a proportionate and necessary manner.

2.4. **Indirect discrimination** means any act or omission, assessment criterion or, apparently neutral provision or practice that formally are the same however their implementation or application results or would result in actual restrictions on the exercise of rights or extensions of privileges, preferences or advantages on the grounds of gender, race, nationality, language, origin, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion, unless that act or omission, legal provision or assessment criterion, provision or practice is justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

2.5. **Harassment** means any unwanted conduct (discrimination) which occurs with the purpose of insulting or offending the dignity of a person, and of creating an intimidating, hostile, humiliating or offensive environment on the grounds of gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion.

2.6. Other terms used in this Procedure shall be understood and interpreted as defined in the Law on Equal Opportunities of the Republic of Lithuania and/or other legal acts of the Republic of Lithuania.

3. IMPLEMENTATION OF EQUAL OPPORTUNITIES WHEN RECRUITING

3.1. In the Company all individuals shall have equal and fair access to employment, regardless of gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin, religion or other grounds, i.e. employment opportunities are determined by one's education, work qualification, experience, skills, abilities, business-like and personal qualities and other criteria relevant to the Company which are related to the ability to perform work promptly and qualitatively (performing duties assigned to the position for which the person is applying).

3.2. While ensuring equal opportunities and non-discrimination, a clear and precise criterion must be established during the recruitment process, based on substantive requirements for applicants. In all cases, the Company gives priority to the individual's ability to perform duties well.

3.3. The Company does not impose Vacancy Announcement requirements and / or restrictions that restrict access / gives priority to take the vacancy on the grounds of gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion.

3.4. Employees of the Company, engaged in the recruitment process shall be familiar with this Procedure and shall adhere to it during the recruitment process, as well as ensure the application of clear selection criteria.

4. IMPLEMENTATION OF EQUAL OPPORTUNITIES IN THE FIELD OF EMPLOYMENT

4.1. Through its activities and procedures, The Company shall create a working environment that recognizes and appreciates the individual differences of all its employees and their contribution to the achievement of common goals.

4.2. According to the legislation, the employees of the Company are provided with equal working conditions, opportunities to improve qualification, to pursue professional development, retraining, practice, vacation, benefits, if applicable, regardless of gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion, or other bases.

4.3. In its employment relationship, in the same or equivalent job (based on their position, requirements) the Company shall use the same employee assessment criteria, regardless of their gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin or religion, or other circumstances not related to the employee's occupation, job performance, professional achievement, personal performance.

4.4. The Company's employees may not discriminate, harass, bully, and/or disrespectfully treat other employees on the grounds of gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin, religion or other backgrounds. Failure to comply with the prohibition, set forth in this Clause of the Procedure shall be treated as a serious violation of duty.

4.5. The Company shall take all reasonable steps to ensure that persons with disabilities (if employed by the Company) have access to a proper workplace environment, career development, training, including appropriate accommodation, provided such measures do not disproportionately burden the Company.

4.6. When determining and/or changing remuneration for specific employees, the Company shall apply criteria relating to the qualification of the employee, level of responsibility, nature and complexity of work performed, achieved results and other objective criteria set by the Company's employee pay system and/or other local legislation.

4.7. For the same or equivalent work, the employees shall be remunerated with equal pay regardless of their gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin, religion or other backgrounds. The same work shall mean performance of work which, based on objective criteria, is equivalent or similar to other work to the extent where employees can switch places between them at no higher cost to the Company. To the Company's achievement of its business objectives, based on objective criteria, work of equal value means that it is no less qualified and no less relevant than other comparable work.

4.8. The Company shall ensure that any employee who complains about Discrimination or takes part in a Discrimination case is not persecuted and is protected from any adverse treatment at work or any negative consequences.

4.9. Upon their request, Company's employees can familiarize with legal acts regulating equal opportunities and the right to be non-discriminated.

5. IMPLEMENTATION OF EQUAL OPPORTUNITIES WHEN TERMINATING EMPLOYMENT

5.1. All Company 's employees are subject to the same legislation of termination of employment as well as the criteria related to employee qualifications, the performance of duties, etc. The criteria for termination of employment shall be the same for all employees regardless of their gender, race, nationality, origin, language, social status, belief, convictions or views, age, sexual orientation, disability, ethnic origin, religion or other backgrounds.

6. SUPERVISION OF THE IMPLEMENTATION OF THE EQUAL OPPORTUNITIES POLICY

6.1. The Company regularly monitors the state of implementation of the Equal Opportunities (Non-discrimination) policy. Compliance with the Equal Opportunities Policy (according to provisions laid down in this Procedure), during the recruitment process, the employment as well as the termination of the employment process, is monitored by appointed person.

6.2. All employees (both permanent or temporary) who believe their equal opportunities are/have been violated have the right to address the issue in writing to the Head of the Company, requesting to investigate the situation.

6.3. In any case, upon receipt of information on violation of the Equal Opportunities (Non-Discrimination) Policy, without delay but not later than within 15 calendar days from the moment the Company becomes aware of possible violations / receives a written request, the Company shall take action to investigate and eliminate such potential violations (should such violations be identified).

6.4. Employees of the Company (both permanent and temporary) who believe their equal opportunities have been violated, in accordance with the procedure established by the Republic of Lithuania Law on Equal Opportunities, have the right to apply to the Equal Opportunities Ombudsperson, regardless of whether the issue was addressed to the entities identified in this Procedure. Following the legislation, resort to the Equal Opportunities Ombudsperson does not limit the employees to uphold their rights in court.

6.5. Any persecution, harassment or hostile behavior towards employee who has complained about Discrimination or any other potential violations of the Equal Opportunities as well as witnesses of such cases, is prohibited. Failure to comply shall be recognized as a serious violation of duties which, under the Labor Code of the Republic of Lithuania, may have legal consequences.

7. FINAL PROVISIONS

7.1. The Procedure is effective from the date of its approval. It shall be reviewed and, if necessary, updated due to changes in mandatory legislation on the provisions covered in this Procedure, as well as due to ineffectiveness of the implementation measures of Equal Opportunities laid out in the Procedure.

7.2. Company's employees shall be familiarized with this Procedure, conforming by their signature or by electronic means (familiarization with the Procedure is a mandatory procedure during the training of employees) and shall comply with the obligations set forth therein, i.e. while performing their duties and while communicating with the other staff members, as well as follow the principles established in this Procedure.

7.3. The Company has the right to amend this Procedure entirely or partially. The employees and other responsible persons shall be informed about the amendments in the manner specified in this Procedure.

7.4. Without limiting the cases mentioned in this Procedure, the violation of this Procedure, considering its specific circumstances, may be considered as a serious violation of duty. Employees liability in case of non compliance shall be treated in accordance with the provisions of the Labor Code of the Republic of Lithuania.

Director Tomas Andriulevičius