

APPROVED

by the order No. V-108 of the Director
of Public Institution Ekoagros
of 27 August 2020

PUBLIC INSTITUTION EKOAGROS ANTI-CORRUPTION POLICY

CHAPTER I GENERAL PROVISIONS

1. Description of the anti-corruption policy (hereinafter referred to as the Description of Anti-Corruption Policy) of the Public Institution ‘Ekoagros’ is an internal document of the anti-corruption management system, which specifies goals, tasks and principles of the anti-corruption policy, subjects responsible for the development and implementation of the Description of Anti-Corruption Policy, and the consequences for the failure to comply therewith.

2. Key terms:

2.1. **Conflict of interest** – a situation where an employee, acting in order to discharge his/her duties, is obliged to perform a certain action, which is related not only with his/her direct duties, but also with his/her private interests.

2.2. **Bribery** shall be understood as a promise or agreement to accept illegitimate or unjustified remuneration (material or immaterial, remuneration which does or does not have any economic value on the market, etc.) by a public servant, an equivalent person, or an intermediary, i.e., a bribe offered in exchange for desired actions, as well as a demand for, or provocation intended to elicit the giving of, a bribe, or the acceptance thereof.

2.3. **Unethical conduct** shall be interpreted as a conduct, which contradicts professional ethics and rules of conduct applicable at the Public Institution ‘Ekoagros’.

2.4. **Nepotism** shall mean the patronage and protectionism of own family members, relatives and other close persons (including cohabitants and life partners) using one’s position, name and power.

2.5. **Illegitimate gifts** are any items, money, gift vouchers, services, exclusive benefits or discounts provided to the employees for the performance of their duties, except gifts received or provided in accordance with international protocols or traditions, which are usually related to the position of the person in civil service or employed at the Institution, as well as gifts given for the purposes of representation (symbols of countries, institutions, companies, etc., also calendars, books or other printings of an informational nature).

2.6. **Subornation** shall mean any items, money, gift vouchers, services, exclusive benefits or discounts provided to the employees for the performance of their duties, except gifts received in accordance with international protocols or traditions, which are usually related to the position of the employee, as well as gifts given for the purposes of representation (symbols of countries, institutions, companies, etc., also calendars, books or other printings of an informational nature).

2.7. **Trading in influence** shall be understood as illegitimate actions performed by abusing one’s position, authorisations or other likely influence designed to induce an establishment, an organisation, a public servant, etc. to take legal or illegal action, or lack thereof, in performing his/duties.

2.8. **Abuse** shall be understood as employee’s (act or omission) exploitation of his/her occupational status for purposes other than the interests of the service or not in accordance with the

laws or other legal acts, or for selfish purposes (misappropriation or transfer of foreign property, funds, etc.) or for other personal reasons, and employee's actions exceeding his/her powers or arbitrariness.

2.9. **Operating partner** is an external party, which Public Institution 'Ekoagros' (hereinafter referred to as the Institution) has established or intends to establish appropriate legal relations with (clients, consumers, subcontractors, consultants, suppliers, sellers, advisors, representatives, intermediaries, etc.).

Other terms are defined in the Lithuanian standard LST/ISO 37001:2017 (Anti-corruption Management Systems. Requirements and Guidelines for Use) (hereinafter referred to as the Standard), the Law on Prevention of Corruption of the Republic of Lithuania, and other legislation.

3. By adopting the Anti-Corruption Policy, the Institution undertakes to comply with the corruption prevention legislation of the Republic of Lithuania and other legislation, and the anti-corruption management system deployed at the Institution, and to show no tolerance towards any form of corruption, including conflicts of interest, bribery, unethical conduct, nepotism, illegitimate gifts, subornation, trading in influence, abuse of office, and other corrupt activities.

4. Provisions of Anti-Corruption Policy shall be fully applicable to all employees of the Institution. All relationships with clients, business partners, and public sector representatives shall also be based on the principles established in the Description of the Anti-Corruption Policy, as well as in compliance with the provisions of the anti-corruption management system deployed at the Institution.

5. The Description of the Anti-Corruption Policy has been drawn up in accordance with the Standard, the Law on Prevention of Corruption of the Republic of Lithuania, as well as having regard to the specifics of the Institution's operation.

CHAPTER II APPLICABLE PRINCIPLES

6. In developing and implementing its anti-corruption policy and the anti-corruption management system, the Institution shall have regard to the following principles:

6.1. The principle of legality. Implemented measures of the anti-corruption management system shall not contradict the laws of the Republic of Lithuania, and other legislation regulating anti-corruption activities.

6.2. The principle of personal example. The good personal example set by managers shall be regarded as a key factor in the development of a culture intolerant to corruption at the Institution and the guarantor of the implementation of an effective anti-corruption management system.

6.3. The employee involvement principle. The continuous notification of employees of the anti-corruption policies implemented by the Institution and their inclusion into the implementation of individual anti-corruption control measures.

6.4. The principle of the adequacy of anti-corruption control measures to the risk of corruption. The development and deployment of new anti-corruption measures, designed to decrease the risk of corruption, having regard to the actual risk of corruption.

6.5. The principle of the effectiveness of the implementation of anti-corruption control measures. The Institution prioritises anti-corruption control measures which are easy to implement, likely to have a significant impact, and unlikely to become a burden to the Institution during the implementation.

6.6. The principle of the inevitability of liability. Every employee of the Institution which has become involved in corrupt activities shall be held liable in accordance with the procedure specified in legislation, regardless of his/her position, functions, merits to the Institution, etc.

6.7. The principle of continuous control, monitoring and improvement. In order to continuously improve the anti-corruption management system, the control of anti-corruption measures implemented at the Institution, and the assessment of the effectiveness of anti-corruption policies shall be conducted on a regular basis.

CHAPTER III

THE GOAL AND TASKS OF THE ANTI-CORRUPTION POLICY, THE SUBJECTS OF THE DEVELOPMENT AND IMPLEMENTATION THEREOF, AND THEIR FUNCTIONS DURING THE IMPLEMENTATION OF THE ANTI-CORRUPTION MANAGEMENT SYSTEM

7. The goal of the anti-corruption policy is to provide the Institution with an effective anti-corruption management system capable of rendering the conditions necessary for the determination and assessment of the risk of corruption arising during normal operation, and the selection of proportionate and effective anti-corruption, as well as other control-related, measures that allow for the reduction in the actual level of corruption, which the Institution finds unacceptable, bringing it down to a more manageable level.

8. The tasks of the anti-corruption policy and the measures planned for their implementation for a specific period shall be approved by the order of the Director of the Institution.

9. The main subjects of the development and implementation of the anti-corruption policy and the anti-corruption management system of the Institution are as follows: the Director of the Institution, the operator of the anti-corruption compliance function appointed by the Director of the Institution (hereinafter referred to as the operator of the anti-corruption compliance function), employees authorised by the Director of the Institution to perform individual functions related to anti-corruption compliance (if necessary), and Heads of the Departments.

10. The Director of the Institution shall be responsible for the implementation of the anti-corruption management system in the Institution and its compliance to the Standard, and also ensures allocation of sufficient resources and relevant appointment of functions necessary for the effective operation of the anti-corruption management system. The functions of the Director of the Institution when implementing the anti-corruption management system shall be specified in the Anti-Corruption Management System Guide of the Public Institution 'Ekoagros' (hereinafter referred to as the Anti-Corruption Management System Guide) and in other documents establishing the anti-corruption management system.

11. The main task of the operator of the anti-corruption compliance function shall be supervision of the development and implementation of the anti-corruption management system. In exercising this task, if necessary, the operator of the anti-corruption compliance function shall have the right to directly communicate with the Director of the Institution. The authorisations of the operator of the anti-corruption compliance function shall be specified in the Anti-Corruption Management System Guide and other internal legislation of the Institution establishing the procedures related to the anti-corruption management system.

12. If necessary, the Director of the Institution shall appoint employees responsible to discharge specific anti-corruption compliance functions by assigning them specific tasks and functions. These employees shall coordinate their activities in the field of the implementation of the anti-corruption policy and the anti-corruption management system with the operator of the anti-corruption compliance function.

13. The Heads of the Departments of the Institution shall ensure the application of the requirements of the anti-corruption policy and the anti-corruption management system and that these requirements are followed in the Departments under their management.

14. All the employees of the Institution shall be held individually responsible for the understanding, performance and application of the requirements of the anti-corruption management system related to their duties at the Institution.

CHAPTER IV THE EXPRESSION OF CONCERN

15. Employees of the Institution shall be encouraged to abstain from being indifferent to the implemented anti-corruption management system, in cases when they find out or suspect potentially corrupt actions, or an attempt to perform such, or violations of private and public interests, or set rules of conduct, and express their concerns by notifying the operator of the anti-corruption compliance function or the Director of the Institution, or doing so in accordance with the rules set forth in the Description of the Procedure for Providing Information on Violations in the Public Institution Ekoagros (TV-29).

16. The Institution encourages people who express their concern over violations of the requirements applicable to the anti-corruption policy and the anti-corruption management system, potential cases of corruption, and violations of public and private interests, and set rules of conduct. The Institution shall hereby undertake to protect and ensure the anonymity of its employees (in case such is requested), as well as their information, to take all measures necessary to ensure that employees who have voiced concerns regarding potential violations of the anti-corruption policy of the Institution, an instance of corruption, a violation of public and private interests, or set rules of conduct, and to make sure that such employees are not subject to retribution, discrimination or any other types of abuse.

17. The Institution shall also encourage its clients, partners and all parties concerned to report both actual and suspected violations of the anti-corruption policy implemented by the Institution by using a trust line +370 700 55006 or by e-mail address ekoagros@ekoagros.lt. The Institution shall hereby guarantee that it will not disclose the identity of whistle-blowers, and that it will take all measures necessary to protect those providing information on violations of the anti-corruption policy from any negative consequences.

18. Provisions regarding the protection of whistle-blowers specified in Clauses 16-17 of the Description shall be applicable even in cases where the information submitted by the person in question turn out to have been incorrect.

19. Depending on their contents, reports shall be inspected and examined, and persons behind the reports notified, in accordance with the internal legislation of the Institution. Reports shall not be transferred to the departments or employees that have been implicated by the persons who have expressed their concerns.

CHAPTER V RESPONSIBILITY

20. The anti-corruption policy of the Institution plays an important role in the development of its organisational culture and rules on occupational conduct. The Institution shall encourage and obligate all of its employees to comply with the provisions of the implemented anti-corruption policy.

21. Violations of the provisions laid out in the Description shall be deemed a grievous violation of occupational duties and shall incur liability set out in the legislation of the Republic of Lithuania and the internal legislation of the Institution.

22. In cases where a violation of the anti-corruption policy contains features of a criminal act, information regarding such shall be relayed to competent authorities and shall incur liability specified in the legislation of the Republic of Lithuania

23. All cases where employees of the Institution violate the anti-corruption policy shall be made public.

CHAPTER VI FINAL PROVISIONS

24. All current and new employees of the Institution shall familiarise themselves with the Description of the Anti-Corruption Policy, confirming such in writing, as well as undertake to comply with the provisions thereof.

25. Given the Institution's undertaking to make every effort to ensure that requirements specified in the Description of the Anti-Corruption Policy are upheld by all of its partners and clients said Description the Anti-Corruption Policy shall be made available to the public.

26. Representative of the Institution, i.e., persons representing its interests or acting on its behalf, who are not employed at the Institution, shall familiarise themselves with the Description of the Anti-Corruption Policy and undertake to comply with the provisions thereof.
