



PUBLIC INSTITUTIONS "EKOAGROS" ANTI-CORRUPTION POLICY

CHAPTER I GENERAL PROVISIONS

1. The Anti-Corruption Policy of the Public Institution "Ekoagros" (hereinafter – the Institution) is an internal document of the Anti-Corruption Management System (hereinafter – ACMS), which establishes the objectives, tasks and principles of the Anti-Corruption Policy, the subjects responsible for its formation and implementation, their main functions, encourages reporting violations of the Anti-Corruption Policy, and stipulates liability for non-compliance with its provisions.

2. Key concepts:

2.1. **conflict of interest** – a situation where an employee, in the performance of his / her job duties, is required to perform a certain action, but that action (activity) is related not only to his / her duties, but also to his / her private interest;

2.2. **bribery** – a promise or agreement by a civil servant or equivalent person, either personally or through an intermediary, to accept an illegal or unjustified reward (material or immaterial, with or without economic value on the market), i.e. a bribe for a desired act (action or inaction) , and a demand or provocation to give a bribe and the acceptance of a bribe;

2.3. **unethical behavior** – behavior that contradicts the provisions on employee ethics and behavior set out in the Code of Ethics (Conduct) of the Public Institution "Ekoagros";

2.4. **nepotism** – the protection and patronage of one's family members, relatives and other close persons (and cohabitants, partners) by using one's current position, name and power;

2.5. **illegal gifts** – any items, money, gift vouchers, services, exclusive benefits or discounts provided to an employee in connection with the performance of his duties, except for gifts received or provided in accordance with international protocol or traditions that are usually related to the duties of a person working in a public service or institution, as well as gifts intended for representation (state, institution, company and other symbols, calendars, books and other informational publications);

2.6. **bribery** – any items, money, gift certificates, services, exclusive benefits or discounts provided to an employee in connection with his / her duties, except for gifts received in accordance with international protocol or traditions that are usually related to the

employee's duties, and gifts intended for representation (state, institutional and other symbols, calendars, books and other informational publications);

2.7. **trading in influence** – illegal actions using one's position, authority or other probable influence in order to influence an institution, organization, civil servant, etc., so that they act or refrain from acting legally or illegally in the exercise of their authority;

2.8. **abuse of office** – an employee (action or inaction) when the official position is used not in the interests of the service or not in accordance with laws or other legal acts, or for selfish purposes (illegally misappropriated or transferred to others property, funds, etc.), or due to other personal incentives, and actions of the employee that exceed the granted powers or are arbitrary;

2.9. **business partner** – an external party with which the institution has established or intends to establish relevant legal relationships (clients, users, contractors, consultants, subcontractors, suppliers, vendors, advisors, representatives, intermediaries, etc.).

Other concepts are defined in the Lithuanian standard LST/ISO 37001:2017 (“Anti-corruption management systems. Requirements and guidelines for use”) with subsequent amendments and / or supplements (hereinafter referred to as the Standard), the Law on Prevention of Corruption of the Republic of Lithuania and other legal acts.

3. The Institution by means of this Anti-Corruption Policy undertakes to comply with the requirements of the laws and other legal acts of the Republic of Lithuania in the field of corruption prevention, the requirements of the anti-corruption management system implemented in the Institution, as well as other legal acts of the Republic of Lithuania, and not to tolerate any forms of corruption - conflict of interest, bribery, unethical behavior, nepotism, illegal gifts, bribery, trading in influence, abuse of office or other acts of a corrupt nature.

4. The provisions of the Anti-Corruption Policy apply to all employees of the Institution. All relationships with clients, business partners, and public sector representatives are also based on the principles established in the Anti-Corruption Policy and in accordance with the provisions of the ACMS implemented in the Institution.

5. The anti-corruption policy was prepared in accordance with the Standard, the Law on the Prevention of Corruption of the Republic of Lithuania, and also took into account the specifics of the Institution's activities, mission and values.

CHAPTER II APPLICABLE PRINCIPLES

6. The institution, when formulating and implementing the Anti-Corruption Policy and ACMS, is guided by the following principles:

6.1. **legality**. The implemented ACMS measures may not contradict the laws of the Republic of Lithuania and other legal acts regulating anti-corruption activities;

6.2. **personal example of managers**. The personal example of managers is a key factor in the formation of intolerance to corruption in a cultural institution and a guarantee of the implementation of an effective ACMS;

6.3. **employee involvement.** Constantly informing employees about the Anti-Corruption Policy implemented by the Institution and involving them in the implementation of individual anti-corruption control measures;

6.4. **adequacy of anti-corruption controls to the risk of corruption.** Development and implementation of new anti-corruption controls to reduce the risk of corruption, taking into account the level of corruption risks identified;

6.5. **effectiveness of the implementation of anti-corruption control measures.** Anti-corruption control measures applied in the Institution must be effective, evidence-based, operate not formally, but in practice, and be periodically checked and improved;

6.6. **inevitability of liability.** Every employee of the institution who has committed an act of a corrupt nature, regardless of the position held, functions performed or merits, is liable to the institution in accordance with the procedure established by legal acts;

6.7. **continuous control, monitoring and improvement.** In order to continuously improve the ACMS, the institution regularly monitors the implemented anti-corruption measures and assesses the effectiveness of the Anti-Corruption Policy;

6.8. **transparency.** Decision-making processes, public procurement, employee activities and relations with external partners must be carried out openly, ensuring transparency and the ability to verify the validity of actions;

6.9. **impartiality.** All decisions must be made objectively, based on facts and legal norms, regardless of personal relationships, political or other interests;

6.10. **proportionality.** The applied control measures and the level of responsibility must be proportionate to the identified corruption risk or nature of the violation.

CHAPTER III

THE GOAL, OBJECTIVES OF ANTI-CORRUPTION POLICY, ITS FORMATION AND IMPLEMENTATION SUBJECTS AND THEIR FUNCTIONS IN IMPLEMENTING THE ACMS

7. The goal of the Anti-Corruption Policy is to create an effective ACMS in the Institution, which would provide an opportunity to identify the corruption risk arising in the operational processes and, after assessing it, select proportionate and effective anti-corruption and other control measures that provide an opportunity to reduce the identified and currently unacceptable corruption risk to an acceptable corruption risk level.

8. The objectives of the Anti-Corruption Policy and the measures planned to implement them for a specific period are approved by order of the director of the Institution.

9. The main entities involved in the formation and implementation of the Institution's Anti-Corruption Policy and ACMS are the Institution's board, the Institution's director, the anti-corruption compliance function executive appointed by order of the Institution's director (hereinafter referred to as the anti-corruption compliance function executive), employees appointed by order of the Institution's director, responsible for separate anti-corruption compliance functions (if necessary), and heads of structural units.

10. The board of the institution is responsible for approving the institution's Anti-Corruption Policy, ensuring that the institution's strategy and Anti-Corruption Policy are

consistent with each other, providing proposals to the director of the institution on sufficient and appropriate resources necessary for the effective operation of the ACMS, and providing reasonable supervision of the implementation of the ACMS by the director of the institution and its effectiveness.

11. The director of the Institution is responsible for the implementation of the ACMS in the Institution and its compliance with the Standard and ensures that sufficient resources are allocated and the functions necessary for the effective and efficient implementation of the ACMS are properly distributed. The functions of the director of the Institution in implementing the ACMS are detailed in the Anti-Corruption Management System Manual of the Public Institution "Ekoagros" (hereinafter referred to as the ACMS Manual) and in other internal documents of the institution regulating the ACMS processes.

12. The anti-corruption compliance function executive has to supervise the implementation of the Institution's ACMS. In implementing this task, if necessary, the anti-corruption compliance function executive has the right to directly address the director of the Institution. The powers of the anti-corruption compliance function executive are detailed in the ACMS manual and other internal documents of the institution regulating ACMS processes.

13. If necessary, the director of the Institution may appoint employees responsible for the implementation of individual anti-corruption compliance functions, setting specific tasks and functions for them. These employees coordinate their activities in the field of Anti-Corruption Policy and ACMS implementation with anti-corruption compliance function executive.

14. The heads of the structural units of the institution must ensure that the requirements of the Anti-Corruption Policy and ACMS are applied and that these requirements are complied with in the structural units under their management.

15. All employees of the institution are personally responsible for understanding, implementing and applying the Anti-Corruption Policy and ACM requirements that are relevant to their duties in the institution.

16. The institution ensures that all employees are regularly provided with training, seminars or informational messages on the provisions, changes and practical implementation of the Anti-Corruption Policy.

CHAPTER IV EXPRESSION OF CONCERN

17. The institution's employees are encouraged to be vigilant in implementing the ACMS and, in cases where they learn of or suspect a possible attempt to commit or commit an act of corruption, a violation of public and private interests or established rules of conduct, to express their concern by informing the anti-corruption compliance function executive or the director of the institution or in accordance with the procedure established in the Description of the Procedure for Providing Information on Violations in the Public Institution "Ekoagros" (TV-29).

18. Employees who encounter an unclear situation or have questions about a possible violation have the opportunity to consult with the anti-corruption compliance function executive confidentially, without submitting a formal report.

19. The institution supports employees who express concerns about violations of the Anti-Corruption Policy and ACMS requirements, possible cases of corruption, violations of public and private interests or established rules of conduct. The institution undertakes to ensure the anonymity of the employee (at his / her request) and otherwise protect the person and information and take measures to ensure that an employee who expresses concerns about a possible violation of the institution's Anti-Corruption Policy, a case of corruption, a violation of public and private interests or established rules of conduct does not experience retaliation, discrimination or otherwise be dealt with.

20. The Institution also encourages its clients, business partners and all other interested parties to report violations or suspected violations of the Anti-Corruption Policy implemented by the Institution by submitting a report to the institution's anti-corruption compliance function executive by telephone or e-mail (contact details are published on the institution's website www.ekoagros.lt in the "About Us" section, in the "Corruption Prevention" section). The institution guarantees that it will not disclose the identity of the person who submitted the report and will take all measures to protect persons reporting violations of the Anti-Corruption Policy from any possible negative consequences.

21. The provisions on whistleblower protection specified in paragraphs 17-18 of this Anti-Corruption Policy also apply in cases where it turns out that the information provided by a person is incorrect or unconfirmed.

22. Received reports, taking into account their content, are investigated, analyzed and responses are provided to the persons who submitted the report in accordance with the procedure established by the institution's internal legal acts. Reports may not be forwarded to the structural unit or employee about whose actions the reporter expressed concern. The process of examining reports is based on the principles of transparency, confidentiality and impartiality. The institution ensures that all received reports are properly investigated.

CHAPTER V RESPONSIBILITY

23. The institution's Anti-Corruption Policy is an important part of the formation of organizational culture and employee behavioral norms, therefore the director of the institution encourages and obliges all employees to comply with the provisions of the implemented Anti-Corruption Policy.

24. Violation of the provisions of the Anti-Corruption Policy is considered a violation of work duties and is subject to liability established in the legal acts of the Republic of Lithuania and the internal legal acts of the institution.

25. In cases where a violation of the Anti-Corruption Policy has the characteristics of a criminal act, the competent authorities are notified and the liability provided for in the legal acts of the Republic of Lithuania is applied for these acts.

26. All cases of violations of the Anti-Corruption Policy committed by the institution's employees are published on the institution's website www.ekoagros.lt in the "About Us" section, in the "Corruption Prevention" area. When publishing violations of the Anti-Corruption Policy, the principles of confidentiality, personal data protection and presumption of innocence are observed.

CHAPTER VI FINAL PROVISIONS

27. All existing and newly hired employees of the institution must familiarize themselves with and confirm in writing that they have familiarized themselves with the Anti-Corruption Policy and undertake to comply with its provisions.

28. The institution seeks to ensure that all of its business partners and clients comply with the requirements set out in this Anti-Corruption Policy, therefore the Anti-Corruption Policy is publicly announced.

29. Representatives of the institution, i.e. persons representing the interests of the institution or acting on its behalf, but who are not employees of the institution, are required to be familiarized with the Anti-Corruption Policy and undertake to comply with its provisions.

30. The institution's Anti-Corruption Policy is approved by the institution's board and must be reviewed at least once a year and, if necessary, updated, taking into account changed legal requirements, ACMS audit results, practical implementation challenges, or suggestions received from employees and external parties.