

UAB MT GROUP ANTI-BRIBERY POLICY

1. INTRODUCTION

UAB „MT Group“ is committed to conducting its business with the highest ethical standards. This policy outlines our commitment to prevent bribery and corruption in all our activities, including design, construction and manufacturing, project management, business development, representation and employment. Our company operates in various energy and industrial sectors including, but not limited to LNG, natural gas, hydrogen, carbon capture, renewable energy, port development and others.

2. DEFINITION OF BRIBERY

Bribery is the offering, promising, giving, or accepting of an undue advantage (financial or otherwise) to improperly influence the action of another person. This can include:

- Offering, giving, receiving, or soliciting: Bribery involves various actions, including offering or giving bribes to others, as well as receiving or soliciting bribes from others.
- Exchange of something of value: Bribery typically involves the exchange of something of value, which can include money, gifts, favors, benefits, or other forms of compensation.
- Influence on decision-making: The primary purpose of bribery is to influence the actions or decisions of individuals in positions of power or authority, often in business, government, or official capacities.
- Corruption of integrity: Bribery undermines the integrity of decision-making processes by introducing considerations other than merit, fairness, or legality.
- Breach of trust: Bribery violates the trust placed in individuals occupying positions of responsibility and authority, whether in the public or private sector.
- Illegitimate gain: Bribery seeks to obtain advantages or benefits that would not be attainable through legitimate means, such as securing contracts, favorable treatment, or preferential outcomes.
- Adverse impact: Bribery can have far-reaching negative consequences, including distorting competition, damaging reputations, fostering a culture of corruption, and undermining the rule of law.
- Legal and ethical implications: Bribery is not only illegal in many jurisdictions but also widely condemned on ethical grounds due to its harmful effects on society, fairness, and justice.

- Complexity and concealment: Bribery schemes can be intricate and may involve attempts to conceal the true nature of the exchange, making detection and prosecution challenging.
- Responsibility and accountability: Individuals and organizations involved in bribery can face legal consequences, financial penalties, reputational damage, and loss of trust from stakeholders.

3. OUR COMMITMENT

UAB „MT Group“ prohibits all forms of bribery, whether directly or indirectly, by our employees, freelancers hired by our company or third-party representatives. We will not tolerate any activity that could be perceived as an attempt to gain an unfair advantage through bribery.

4. KEY PRINCIPLES

- **Integrity:** We will conduct all business dealings with honesty, fairness, and transparency.
- **Compliance:** We will comply with all applicable anti-bribery laws and regulations in the countries where we operate.
- **Due Diligence:** We will conduct thorough due diligence on all third-party partners before entering into business relationships.
- **Gifts and Hospitality:** We will offer and accept gifts and hospitality only in accordance with our internal Gifts and Hospitality Rules.
- **Facilitation Payments:** We strictly prohibit offering or accepting facilitation payments (payments intended to expedite routine government actions).
- **Record Keeping:** We will maintain accurate records of all financial transactions.
- **Reporting:** We encourage employees to report any suspected instances of bribery through our anonymous reporting tool (see MT Group [Whistleblowing Procedure](#)).

5. EMPLOYEE RESPONSIBILITIES

- All employees are responsible for understanding and complying with this policy.
- Employees must not engage in any activities that could be construed as bribery.
- Employees must report any suspected instances of bribery to their supervisor or through the anonymous reporting hotline.
- Employees must cooperate fully with any investigations into potential bribery.

6. TRAINING AND AWARENESS

UAB „MT Group“ shall provide regular training on anti-bribery policies and procedures to all employees.



7. ENFORCEMENT

Any employee found to be in violation of this policy will be subject to disciplinary action, up to and including immediate termination of employment.

8. REVIEW

This policy will be reviewed periodically to ensure its continued effectiveness.

9. REPORTING SUSPECTED BRIBERY

As set in company's Whistleblowing Procedure, Employees or anyone else can report suspected bribery anonymously through the following methods:

- By filling in the contact us section on the website (any language understood by the employee and MT Group administration).
- Sending a letter to Compliance department (any language any language understood by the employee and MT Group administration).
- By filling in an anonymous form (in Lithuanian only).

Approved by: General Manager Simonas Kunickas

Date: 25.04.2024