

MT GROUP

Supplier's Code of Conduct

Contents

Introduction	3
Purpose	4
General Expectations	7
Specific Expectations	8
Business Integrity	8
Human Rights including Labor Rights	8
Anticorruption	9
Prevention of Child Labor	10
Remuneration	10
Forced Labour	11
Working Hours	11
Health and Safety	12
Nondiscrimination	13
Freedom of Association and Right to Collective Bargaining	13
Protection of Data, Business Secrets and Company Assets	14
Environment	15



Introduction

MT Group is one of the fastest-growing European EPC contractors specializing in the development and execution of strategic energy infrastructure.

Headquartered in Lithuania, MT Group delivers complex Engineering, Procurement and Construction (EPC) projects across Europe, supporting governments, utilities, energy developers and industrial clients in building the next generation of resilient energy systems.
Company has established a strong track record in LNG terminals, natural gas transmission infrastructure, hydrogen production and storage, carbon capture, battery energy storage systems (BESS), renewable energy infrastructure and electrical, instrumentation & control (E&I&C) solutions for critical infrastructure.

Through a recent strategic acquisition, MT Group has also expanded into advanced defense technologies and critical infrastructure engineering, strengthening its capability to deliver highly secure dual-use infrastructure.



Purpose

UAB MT Group stands for and is committed to integrity, high standards and right conduct. We believe that acting responsibly is a fundamental basis in the way we do business and for creating long-term value. This entails being a responsible company, having high integrity in our business relationships and acting with care for the societies and environments in which we operate.

Corporate sustainability starts with a company's value system and a principled approach to doing business. Seeking to develop a collective awareness and universal principles in terms of common action marked by integrity and responsibility, this Code of Conduct for Suppliers provides guidance and support to suppliers, subcontractors, partners of UAB MT Group and other third parties who have a contractual obligation to comply with the code for making decisions and carrying out their work based on responsible ethical, social and environmental practice.



Purpose

In order to identify and address potential breaches of our Code of Conduct, UAB MT Group performs suppliers' systematic risk-based due diligence, which includes screening of suppliers, supplier self-assessments and audits. If breaches are identified, the supplier and UAB MT Group will collaborate and agree on an action plan of appropriate improvement measures. These shall mitigate and remedy the adverse impacts caused by the breaches and enable the supplier to identify and prevent similar occurrences in the future. We require our suppliers to engage actively and without reservation in these activities. We are aware that improving ethical, social and environmental performance requires time and resources.



Purpose

However, if a supplier by intention or repeated negligence fails to live up to this Code in a manner that is explicit and severe, or if the supplier demonstrates a continual refusal to engage in due diligence activities or a lack of commitment to make progress on issues identified, UAB MT Group reserves the right to pursue a termination of the business relationship.

We request the supplier to communicate this Supplier Code to those of his employees concerned with our business. In addition, the supplier must request the same or equivalent compliance standards from the suppliers and business partners he uses or intends using to deliver supplies or services to us.



General Expectations

Keeping up with the requirements of integrity, high standards and right conduct, companies are not only upholding their basic responsibilities to people and planet, but also setting the stage for long-term success. We expect that our suppliers - whether signatories or not - share this fundamental principle. Therefore, we seek to prevent or mitigate any adverse impacts related to our operations, products or services, even if these impacts have been carried out by suppliers or business partners.

It is essential for the supplier to periodically evaluate any and all risks for environment and employees and other related persons. We expect for suppliers' continuous performance improvement in human rights, labor rights, environment, and anti-corruption. Furthermore, our suppliers shall comply with all applicable national laws, rules and regulations. The supplier shall adhere to national regulation while seeking to honor the international rights and principles reflected in the following chapter.



Specific Expectations

BUSINESS INTEGRITY

The supplier shall conduct business in compliance with legal requirements and to adhere to internationally agreed standards of business ethics. It must be ensured that suppliers do not discuss topics that could violate, or appear to violate, competition laws by price-fixing; terms of sale; bid-rigging; division of markets, territories or customers; tying and bundling products; using deceptive trade practices; or abusing a dominant market position.

HUMAN RIGHTS INCLUDING LABOR RIGHTS

We expect suppliers to respect and support human rights. Respecting human rights means a business should use due diligence to avoid infringing human rights (“do no harm”) and should address adverse human rights impacts with which they are involved. In addition, beyond respecting human rights, business is encouraged to take action to support human rights. This means seeing the opportunity to take voluntary action to make a positive contribution towards the protection and fulfillment of human rights.



Specific Expectations

ANTICORRUPTION

Suppliers working with MT Group must comply with the following anticorruption requirements:

- not engage in any form of corrupt practices, including extortion, fraud, or bribery whether direct or indirect.
- to adhere to the principles of fair competition and an open market;
- to neither directly nor indirectly offer, give, solicit, or accept any personal payments or any other equivalent of monetary value (e.g., gifts, discount coupons, vouchers, tickets to cultural, entertainment, or sporting events, etc.), nor gifts intended to influence a business transaction or gain a business or personal advantage;
- to avoid conflicts of interest within the scope of the agreement with UAB MT Group or the contents of the Purchase Order;
- to inform all employees working under the agreement (purchase order) with UAB MT Group of these requirements and to ensure that these requirements are met;
- in addition to the requirements of applicable law, we expect the supplier to introduce these anticorruption requirements within their organizations and their business operations and to report any case of corruption to the local authorities.



Specific Expectations

PREVENTION OF CHILD LABOR

We expect that the supplier ensures that no person shall be employed at an age younger than 15, or the legal minimum working age in the country of operation, whichever is higher. The supplier should protect young workers of legal working age, up to the age of 18, from any type of work which is likely to harm the health, safety or morals of the child as a consequence of its nature or the circumstances under which it is carried out. If a child is found working, the supplier must act in the best interest of the child, and any measures taken should aim at improving the child's situation.

REMUNERATION

We expect the supplier to comply with all wage and benefit laws and regulations, including those pertaining to minimum wages, overtime wages, sick leave, piece rates and other elements of compensation. The supplier shall also comply with lawful collective agreements on wages and benefits.



Specific Expectations

FORCED LABOUR

Prevention of forced labour. Suppliers shall not use any form of forced, bonded or involuntary labour, including human trafficking. Workers shall be free to leave their employment on reasonable notice, and suppliers shall not retain identity documents or require recruitment fees or deposits.

WORKING HOURS

The Supplier shall comply with the relevant legal regulations for health and safety in the workplace and to support the further development and improvement of working conditions. Working hours correspond at least to the respective national legal standards or the minimum standards of the respective national economic sectors.



Specific Expectations

HEALTH AND SAFETY

We expect the supplier to ensure that the workplace is safe and contains no health hazards, establish appropriate organizational structures and procedures for the effective management of health and safety risks, and train employees on these procedures. Suitable procedures and plans shall be developed and published. The supplier shall take appropriate precautionary measures to protect employees from work related hazards and anticipated dangers in the workplace. The supplier shall comply with all applicable local Laws and regulations to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities.



Specific Expectations

NONDISCRIMINATION

We expect that the supplier's employees are selected on the basis of their ability to do the job and that there is no distinction, exclusion or preference made on other grounds. Discrimination may not occur in access to employment, to particular occupations, promotions and to training and vocational guidance, or with respect to the terms and conditions of the employment (recruitment, remuneration, hours of work and rest/paid holidays, maternity protection, security of tenure, job assignments, performance assessment and advancement, training and opportunities, job prospects, social security, occupational safety and health, etc.).

FREEDOM OF ASSOCIATION AND THE RIGHT OF COLLECTIVE BARGAINING

We expect that the supplier does not prevent employees and other workers from associating freely and voluntarily establish and join groups for the promotion and defence of their occupational interests.

Suppliers shall respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law.



Specific Expectations

PROTECTION OF DATA, BUSINESS SECRETS, AND COMPANY ASSETS

Confidential data, business secrets, and company assets have to be protected. The supplier shall observe all laws in force to protect the personal data of employees, customers, suppliers, and other parties concerned.

Suppliers shall respect the know-how, patents, trade and business secrets of UAB MT Group and third parties and do not pass such information on to third parties without the express prior written consent of UAB MT Group or in a way that is otherwise inadmissible.



Specific Expectations

ENVIRONMENT

The Supplier shall comply with all applicable local and national environmental laws and regulations and maintain all required licences, registrations and permits. Beyond legal compliance, we encourage suppliers to:

- take a precautionary approach to environmental risks;
- identify and minimise the environmental impacts of their operations, including by preventing pollution from hazardous substances, waste, effluents and air emissions;
- use natural resources, energy and land efficiently, and protect biodiversity;
- operate an environmental management system (e.g. ISO 14001 or equivalent) at their worksites.

CLIMATE AND ENERGY

We encourage suppliers to measure and reduce their greenhouse gas emissions. Where available, we ask suppliers of carbon-intensive materials to provide Environmental Product Declarations (EPDs) according to EN 15804 or ISO 14025, or to indicate whether one is under development, and to share product carbon data on request.

Approved by order no. VA26-269 on 2026/11/13





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