



Version: 4

Approved by the Board of AUGA group, AB on March 24, 2026

HUMAN RIGHTS, EQUAL OPPORTUNITY (DIVERSITY) NON-DISCRIMINATION, CHILD LABOUR AND FORCED LABOUR POLICY

1. GENERAL PROVISIONS

- 1.1. This human rights, equal opportunity (diversity), non-discrimination, child labour and forced labour policy (**the Policy**) shall apply to AUGA Group AB (**the Company**) and its subsidiaries (**the Group**).
- 1.2. The Group respect human rights and seeks to prevent their violation. The Group seek to create value for customers, employees, society, and other stakeholders, thus, in all areas of activity it pays special attention to fair business practices, appropriate working conditions, and strives to comply with the most important international human rights principles.
- 1.3. The purpose of the Policy is to establish the principles of monitoring the promotion, implementation and enforcement of human rights and the main measures for the implementation of these principles in the Group . Also, to ensure a respectful, safe, and inclusive working environment where all employees and job applicants are provided with equal opportunities, regardless of their personal characteristics or social status.
- 1.4. The Policy is developed in accordance with The Charter of Fundamental Rights of the European Union, European Convention for the Protection of Human Rights and Fundamental Freedoms, the International Covenant on Civil and Political Rights, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the core conventions of the International Labour Organization and other legislation of the Republic of Lithuania and international law.

2. PROTECTION OF HUMAN RIGHTS

- 2.1. The Group respect the human rights enshrined in the legislation referred to in paragraph 1.4 of the Policy. The principles of the protection of human rights are applied and ensured in all areas of activities.
- 2.2. The Group's activities are based on the principle of respect for human rights, which recognises the universality and integrity of human rights, and ensures that activities do not directly or indirectly violate human rights.
- 2.3. We apply the principles of the protection of human rights to ourselves and to all stakeholders. We aim not to have a business relationship with partners who do not adhere to the principles set out in this Policy. Our partners, suppliers and contractors are encouraged to adhere to the core standards of the protection of human rights.

3. EQUAL OPPORTUNITY (DIVERSITY) AND NON-DISCRIMINATION

- 3.1. The Group adhere to and implement the principles of gender equality and non-discrimination on other grounds established in the legislation of the Republic of Lithuania and international law. The Group do not tolerate discrimination, humiliation, harassment or insults based on employees' gender, age, nationality, race, language, origin, social status, sexual orientation, disability, health status, ethnicity, religious or political beliefs or views, or other personal characteristics. The Group promote a work environment that reflects the diversity of society and implement the principles of tolerance and respect for diversity across their operations.
- 3.2. Any form of discrimination within the Group is prohibited on the grounds of sex, race or ethnic origin, nationality or citizenship, language, religion or belief, age, disability, state of health, sexual orientation, social status, marital status, trade union membership, political views, intention to have children, or the

exercise of employee rights under applicable legislation.

- 3.3. The Group seek to ensure diversity within collegial bodies and key management positions with respect to gender, age, and ethnic or cultural background. In the composition of the Group's collegial bodies and key management teams, efforts must be made to ensure diversity of perspectives, self-expression, skills, professional experience, knowledge, and ways of thinking. The Company aims to ensure that individuals of the underrepresented gender hold no less than 33% (and no more than 49%) of the positions within its governing bodies. This objective must not be interpreted as a quota (i.e., a rule determining how many individuals of the underrepresented gender must be appointed to specific positions), but rather as a diversity goal pursued through non-discriminatory measures. When selecting candidates for governing bodies or key management positions whose qualifications, suitability for the role, competencies, and professional performance are equivalent, preference shall be given to the candidate of the underrepresented gender.
- 3.4. Employee recruitment processes within the Group are implemented and carried out on the basis of objective, job-related criteria. Job advertisements must be prepared in a neutral and non-discriminatory manner. Only criteria directly related to the performance of job functions are assessed during the selection process, including professional qualifications, work experience, competencies, and the ability to perform the required duties. Candidates may not be asked questions regarding marital status, plans to have children, religion, political views, or any other aspects of their private life that are not related to job functions.
- 3.5. Employee performance is assessed using uniform procedures and clear, measurable and/or quantifiable, reliable and easily verifiable criteria known to employees. The Group's employees are paid the same salary for the same or equivalent work. The amount of remuneration for a potential or current employee is determined in accordance with the wage limits set for the employee's job level and in accordance with objective criteria related to the employee's performance (applicable to existing employees), abilities, competence, qualifications, experience and knowledge. The Group ensure equal pay for work of equal value. Decisions regarding employee promotion or career opportunities are based on professional competencies, job performance, and professional potential.
- 3.6. Employees with fixed-term employment contracts are guaranteed equal working conditions, including remuneration, as employees with open-ended employment contracts who are performing the same or a similar job function according to their qualifications or abilities.
- 3.7. All employees of the Group have the right to form or join associations of their choice as far as the employer-employee relationship is concerned and right to collective bargaining. The Group opposes disciplinary or discriminatory action against employees who choose to form or join associations peacefully and legally. The Group's employees are prohibited from using any form of intimidation to prevent other employees from exercising their right to form associations or to belong to any association.
- 3.8. Every employee of the Group is encouraged to comply with the requirements of mutual tolerance and respect for human rights in accordance with the principles provided for in the legislation of the Republic of Lithuania and international law, as well as this Policy.

4. CHILD LABOUR AND FORCED LABOUR

- 4.1. The Group comply with the prohibitions and restrictions on child labour and forced labour set forth in the legislation of the Republic of Lithuania and international law.
- 4.2. The Group do not employ persons who are younger than the minimum age set by the legislation of the Republic of Lithuania.
- 4.3. The Group do not engage in any form of forced labour, including involuntary employment or certain conditions related to lodging of a security or seizure of identity documents, and restriction of free movement. The Group do not tolerate or contribute to human trafficking.

5. IMPLEMENTATION OF THE POLICY AND CONTROL OF THE IMPLEMENTATION

- 5.1. The Policy is published on the Group's website so that it can be accessed and complied with by any of the Group's business partners, service providers, consultants and other third parties with whom the

Group's employees have dealings.

- 5.2. The Group shall provide conditions for notifying violations of the Policy and receiving required information connected with implementation of the Policy by e-mailing to etika@auga.lt. The Group shall implement all measures to protect persons notifying violations of the Policy against any negative consequences: the e-mail address referred to above shall only be accessed by the head of the HR Department of the Company, who shall assume the obligation to not disclose the identity of notifying persons to any employees or other third parties.
- 5.3. All reports of possible violations of the Policy must be properly investigated by persons appointed by the Head of the Company's Human Resources Department.
- 5.4. The Head of HR Department of the Company shall collect summarised information about notices, inquiries and complaints received in the preceding calendar year according to this Policy and prepare a report to the Board of the Company on implementation of the Policy and the need to adjust it (if required) and provide it for consideration to the Board of the Company before the ordinary general meeting of shareholders of the Company of the respective year.

6. FINAL PROVISIONS

- 6.1. This Policy shall be approved and, where needed, amended by the Board of the Company.
- 6.2. Any person shall notify the possible need to adjust the Policy, explaining the need and its circumstances, to the Head of HR Department of the Company, who, after considering the received notification and deciding that the adjustment would be recommended, shall make appropriate recommendations to the Board of the Company.
- 6.3. All current and new employees must familiarise themselves with the Policy and adhere to its requirements.
- 6.4. The Policy shall apply to the extent it is not in conflict with laws and/or other enforced legal acts of the Republic of Lithuania.