



Code of Conduct



bité
Group

BITÉ GROUP'S CODE OF CONDUCT

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BITÉ GROUP'S CODE OF CONDUCT

INTRODUCTION

A message from the CEO

Dear Team,

BITÉ Group is a leading telecommunications and media group, thus our everyday life circles around the people we serve and work with. It is important to remember that people are also our the most important asset.

This Code of Conduct is one of the means through which our people put BITÉ Group's values into practice. Our values and our culture are shaped by our words and most importantly – by our actions every single day.

Therefore, we certify that when performing our job duties, we should all act lawfully, ethically, and in the best interests of BITÉ Group, its shareholders, employees, and the public.

Pranas Kuisys, CEO at BITÉ Group

Why do we have a code of conduct?

The BITÉ Group Code of Conduct (here after the Code of Conduct, or the Code) contains the principles by which BITÉ Groups' values and standards are put into practice. We expect all our employees to act in a fair and ethical way and to look out for each other and the environment on an everyday basis.

At BITÉ Group, we believe that good business conduct and responsible business starts from each of us. The purpose of this Code of Conduct is to help us all at BITÉ Group to make the right decisions and to provide guidance on how to live in accordance with our values and preserve our good reputation.

The Code of Conduct is here to help you to:

- Live in accordance with BITÉ Group's values / expectations & standards
- Make good decisions on an everyday basis
- Act honestly and ethically
- Uphold and protect BITÉ Group's reputation

Who is the code of conduct for? / what does it mean for me?

Applicability & expectations

The Code of Conduct applies to all of us at BITÉ Group: employees (regardless of the nature of employment), directors, and the members of the board, as well as any contractor, consultant, or similar working for us. The Code of Conduct also applies to the entire BITÉ Group, all the companies under it and all our business operations.

Everyone that the Code of Conduct applies to are expected to properly familiarize themselves with the Code and to act in accordance with it. We encourage everyone to take the time to discuss and reflect on the expectations set in this Code of Conduct – and to be in contact with you manager/supervisor in case you would have questions.

Speak-up

At BITÉ Group, we support a culture that is open and transparent – and everyone is encouraged to speak up when something feels wrong.



If you would happen to become aware of a potential or actual breach of the Code of Conduct, it is your duty to immediately raise your concerns, either by turning to your manager/supervisor, or by using our reporting channel, through which an anonymous e-mail can be sent to etika@bitegroup.net, or by using other contact points of whistleblowing system as indicated in the Transparency Policy.

What are the consequences of not complying?

Everyone covered by this Code of Conduct is expected to follow the principles set out in it. We take all violations of the Code of Conduct seriously, and non-compliance with it, or with laws and regulations in general, may lead to disciplinary actions, or even termination of the employment relationship.

Our mission & values

We believe smart solutions can make people's daily life easier. Our aim is to make those solutions so simple and comfortable, that they become an integral part of life.

Everything we do we base on these values:

Attention to People

Our greatest assets are people - employees, clients and partners. We strive to create long-lasting relationships based on honesty, openness, and trust.

We know that we will be successful only if we understand the needs, aspirations, and goals of every person. Only then will we be able to build strong and long-lasting relationships. This is our advantage and our DNA.

Teamwork

We act as a single, strong, and focused team. Together we strive for goals and we celebrate victories together.

Our team includes not only our own employees, but everyone who is with us in pursuit of ambitious goals - for us and for others. Unity makes us stronger, faster, and more efficient.

Creativity

By looking for the best solutions, we are able to look from the other corner and discover what others fail to notice.

In solving every problem, we strive for a fresh perspective and new ideas. Our thinking is unrestrained because we are curious and open-minded.

Excellence in Execution

The average result is not enough for us - we always strive for the best. Today we do better than yesterday, and tomorrow we will do better than today.

The constant desire to strive for perfection is our natural state of being. It is the only way for us to ensure the best possible quality for our clients.

Passion to Win

We strive for the highest goals with zeal and believe that everything is possible. And we do it with highest moral standards.

Victories ignite us and there will never be enough of them. We accept the biggest challenges because we know how to win and just love to celebrate victories.

WE DO BUSINESS THE RIGHT WAY

We believe in conducting business in a fair, transparent, and ethical way and in accordance with all applicable laws and regulations. This is the bottom line and something we expect all our employees to follow in their every-day operations.

Compliance with laws & regulations

We always follow applicable laws and regulations in everything we do and consider it to be a minimum starting point for having a 'license to operate'. Everyone at BITÉ Group should be aware of, understand and adhere to the laws and regulations related to their work. You are encouraged to be in contact with your supervisor/manager or the legal department in case you have questions on the expectations laws and regulations set on you in your work role.

Anti-corruption

At BITÉ Group, we are committed to operating and conducting our business in an open and transparent manner and we condemn corruption or bribery of any kind in the private or the public sector.

Bribes

At BITÉ Group, we have a zero tolerance towards bribes and do not accept bribery in any form. In practice this means, for example, that;

- we do not give any bribes to officials of state authorities (directly or indirectly) thus attempting to influence them in order to receive preferences or to retain business;
- we do not offer, promise or take (directly or indirectly) financial remuneration attempting to incite others to misconduct;
- we do not tolerate any wrongful payments inciting inappropriate decisions for the benefit of the Company.¹

Gifts and hospitality

BITÉ group recognizes that entertainment for customers and business partners may be an important means of presenting our company and our services. However, we are aware of that business courtesies, such a gifts and hospitalities, may be considered or perceived as bribes or create a situation of conflict of interest. Both the giving and receiving of gifts and hospitalities may never improperly influence, or appear to influence, our decisions or the decisions of our customers and business partners.

Gifts and hospitalities are only suitable and permitted when they follow and are in accordance with more detailed instructions in the *BITÉ Transparency Policy*, and with requirements set in local laws.

Fair competition

At BITÉ Group, we believe in competing fairly and in accordance with applicable laws and regulations. Fair competition is part of our way of doing business.

We expect everyone at BITÉ Group to comply with existing competition laws and we do not take any part in activities that restricts or impede effective competition. One example on activities that restricts effective competition is, for example, the entering into so called prohibited agreements with competitors. Violations of competition laws can lead to serious legal and financial consequences, but also seriously damage our reputation.

¹ The examples are copied from BITÉ Groups' own policies sent to KPMG

Everyone at BITÉ Group is further expected to read through, understand and follow our *Fair Competition Policy* (*Sqžiningo konkuravimo politika*)

Money laundering

We firmly oppose to all form of money-laundering and follow all applicable anti-money laundering laws, and we are committed to taking measures to prevent money-laundering activities within our sphere of influence.

Money laundering is a term used to describe the process by which criminals disguise the original ownership and control of the proceeds of criminal conduct by making such proceeds appear to have come from a legitimate source.

Working with third parties

BITÉ Group cooperate and work with several third parties, such as business partners and suppliers. We appreciate our third parties and value the cooperation highly. However, working with third parties can expose us to risk, both in form of legal and reputational risks.

Therefore, we only work with third parties that can commit to the same, or equivalent, standards as us. That is why we expect our suppliers to follow our Supplier Code of Conduct. We always make sure that all third parties that we cooperate with have gone through legal, financial and security screening processes, to evaluate the impact on data security and safety of our systems. Our aim is to in the future integrate and strengthen the role of sustainability aspects, especially related to climate, in the selection of our suppliers, e.g. by integrating sustainability requirements into our tendering processes.

WE CARE ABOUT THE PLANET

We believe that everyone has a shared responsibility to protect the planet, environment and the climate. This responsibility also includes us at BITÉ Group. We expect everyone to follow environmental laws and regulations that apply to them and our business, and to follow our environmental standards and commitments

We recognize that our day-to-day operations have a negative impact on the environment and we are committed to minimizing that impact, which we do by, for example, following the ISO 50001, the flagship International Standard for improving energy performance in BITÉ Group telecommunication networks.

The mitigation of climate change is a key focus area for us, and we seek to minimize greenhouse gas emissions that stems from our operations. We, for example, reduce emissions by only selecting renewable energy providers, replacing old and less energy-efficient technologies, implementing energy efficiency features in current operations, and by encouraging our employees to adopt electricity and fuel saving behaviours.

WE CARE DEEPLY ABOUT OUR PEOPLE

Our employees are our most valuable asset. The wellbeing of our employees is and will always be at the very center of our business. Taking care of each other and seeing to everyone's wellbeing at work is therefore essential for us at BITÉ Group.

At BITÉ Group, we are also committed to respecting internationally recognized human rights² in all our operations and we do not tolerate human rights violations in any form. We expect the same from all third parties that we cooperate with.

We respect and treat each other fairly

Equality and respect are fundamental values to us. We always treat one another with dignity and respect, regardless of who they are, or where they may come from.

At BITÉ Group, we do not tolerate any form of discrimination (direct or indirect) or harassment. We promote equality throughout the entire employment life cycle.

We foster diversity & inclusion

We believe that diversity among our employees is a valuable asset that makes us stronger. For us, diversity means various aspects of diversity, such as gender, age, skills, experiences, culture, and personality. We are committed to building a diverse and inclusive workplace, where everyone can thrive and be themselves.

We expect everyone to further acquaint themselves and comply with our *Diversity Policy (lygių galimybių politikos įgyvendinimo ir vykdymo priežiūros principų įgyvendinimo priemonės)*.

A secure working environment & just working conditions

Safe working environment

A healthy and safe working environment is a prerequisite for employees to be able to thrive at work. At BITÉ Group, we want to protect and improve the health and safety of everyone who works for or with us, wherever we operate.

It is BITÉ Group's responsibility as employer to provide all our employees with a safe working environment. We recognize a shared responsibility to encourage a healthy work culture that promotes the wellbeing of each other, and each one of us has the responsibility for maintaining a safe working environment by following all safety and health rules and practices. We expect employees to give feedback on any possible observations about unsafe behaviour and conditions.

Fair & just working conditions

We provide everyone with just and favorable working conditions and uphold the right to form and join trade unions and to bargain collectively.

WE CARE PASSIONATELY ABOUT OUR CUSTOMERS

Aspiring to excellence

² Internationally recognized human rights are generally understood to be the human rights contained in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), coupled with the principles concerning fundamental rights in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work.

Our customers are at center of everything we do, and we are passionate about exceeding our customers' expectations. Everyone at BITÉ Group have a role to play in ensuring that the services we provide meet and exceed the expectations of our customers.

Customer privacy & personal data

Our customers should feel secure and have confidence in us and our business. Protecting the privacy of our customers is central in order to earn and sustain our current and future customers' trust. We only collect personal data in the manner permitted by the law and subject to the orders issued by the authorities. We always process personal data in accordance with all applicable laws and regulations.

Personal data includes all information about a person whose identity is clear or can be established by obtaining and combining additional information.

WE CARE ABOUT OUR COMPANY

We care about our company's brand and reputation – and do not act in a way that could harm or endanger that.

Conflict of interest

At BITÉ Group, we expect everyone to act in the best interest of the company. It is everyone's responsibility to put BITÉ Group's legitimate business interests first, and to not let personal interests influence actions and decisions made on behalf of BITÉ Group.

In line with our commitment to conduct business responsibly, we avoid situations of conflicts of interest. A conflict of interest exists when our personal interest conflicts, or could be perceived to conflict, with the interests of BITÉ Group. Any potential or perceived conflict of interest must openly and transparently be disclosed.

Company assets

We all have a responsibility to protect and safeguard BITÉ Group's company assets. Simply put, company assets include everything that BITÉ Group owns and uses to conduct business and can be both tangible and intangible (such as intellectual property).

It is everyone's duty to protect and to never improperly disclose BITÉ Group's business secrets and any confidential information. Business secrets include, among other things, BITÉ Group's business plans, technical, functional, and commercial information on the network and services.

Insider trading

To ensure that BITÉ Group employees do not abuse, and do not place themselves under the suspicion of abusing, inside information which they may be thought to have, especially during periods leading up to an announcement of financial results, every holder of securities is obliged to follow BITÉ GROUP SECURITIES DEALING CODE. The BITÉ GROUP SECURITIES DEALING CODE prohibits an employee from dealing with covered securities during a results blackout period or any other period in which the employee has, or believes that the BITÉ Group may have, inside information.

BITÉ Group manager or other employee must not deal in the securities of any company of which he or she may have inside information, or disclose such information to anyone other than in the proper course of his or her employment.

Responsible external communication

We are thoughtful on how we communicate and act responsibly in our external communication with our stakeholders. We do our best to provide information in a transparent, accurate and honest manner and interact with our external stakeholders to maintain and build trust in us. Non-confidential information is distributed openly and equally to our customers on official information channels at BITÉ Group.

BITÉ Group encourages employees to share (non-confidential) news, such as milestones and advancements within the company, on their own personal social media channels. However, whenever using social media, we display good manners, and employees that use social media should ensure that any post reflects their personal views, and not the official view of BITÉ Group. Only mandated individuals are allowed to speak publicly on behalf of BITÉ Group and its companies.