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STONUS GROUP
ANTI-CORRUPTION POLICY

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APPROVED
CEO of UAB „STONUS Group“
15 April 2026 order No. V04-10/1

STONUS GROUP ANTI-CORRUPTION POLICY

1 PURPOSE AND SCOPE

- 1.1 The Anti-Corruption Policy (hereinafter – the Policy) establishes the principles of transparency and commitments applicable within the group of companies managed by UAB "STONUS Group" (hereinafter – the STONUS Group), with the aim of creating a corruption-resistant environment.
- 1.2 The purpose of the Policy is to ensure transparent, fair, and responsible operations of the STONUS Group by preventing corruption in all areas of the STONUS Group's activities.
- 1.3 The Policy shall apply to all employees of the STONUS Group.
- 1.4 The STONUS Group conducts its activities in compliance with the highest ethical standards and principles, guided by transparency, integrity, and ethical conduct, and seeks to ensure that all its business partners adhere to the requirements of the Policy.

2 KEY DEFINITIONS

- 2.1 **Employee** – a natural person employed by a company of the STONUS Group.
- 2.2 **Gift** – any item of civil rights having monetary or non-monetary value given or provided to an Employee for use free of charge, including but not limited to items, services, discounts, privileges, or any other material or non-material benefits that place the Employee in a more favorable material or non-material position.
- 2.3 **Conflict of interest** – a situation in which an Employee, in the performance of their duties or responsibilities, is required to make a decision, participate in decision-making, or take an action that may be influenced by their private interests.
- 2.4 **Corruption** – the abuse of entrusted authority for private gain, whether for oneself or for another person, in the public or private sector.
- 2.5 **Corruption Prevention** – a systematic activity aimed at increasing the company's resilience to corruption, including the identification, assessment, elimination and/or reduction of corruption risk factors through the development and implementation of a system of measures for creating a corruption-resistant environment.
- 2.6 **Bribe** – any material or non-material benefit that is promised, offered, given, or accepted with the intention of influencing a person's action or inaction in the performance of their duties.

3 GENERAL PROVISIONS

- 3.1 The STONUS Group, taking into account the Guidelines for Creating a Corruption-Resistant Environment for Businesses (<https://www.stt.lt>), best practices of corporate anti-corruption compliance, the OECD Guidelines for Multinational Enterprises, and the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions:
- approves this Anti-Corruption Policy;
 - commits to leading by example through its conduct;
 - ensures that Employees are informed of the importance of the Policy.
- 3.2 By approving the Policy, the STONUS Group commits to complying with applicable national and international legal acts regulating the Group's activities in the field of corruption prevention and to adhere to the principles of business ethics and transparency.
- 3.3 The STONUS Group strives to ensure that its activities and conduct comply with the highest standards of reliability, integrity, transparency, and business ethics accepted in society.
- 3.4 The STONUS Group has zero tolerance for any form of criminal activity or unethical business conduct, including:
- Requesting, accepting, giving, or authorizing a bribe, directly or indirectly, as well as trading in influence.
 - Bribery of officials of the Republic of Lithuania and foreign countries.
 - Participation in cartel agreements.
 - Facilitation payments.
 - Providing or accepting donations or other benefits that could influence unlawful decisions.
 - Improper accounting practices and tax evasion.
 - Participation in criminal or other activities inconsistent with business ethics.
- 3.5 Where the Policy, laws, or other legal acts do not establish specific rules of conduct, the behavior of the STONUS Group's Employees must comply with the highest standards of reliability, integrity, and transparency.

4 GENERAL PRINCIPLES FOR CREATING A CORRUPTION-RESISTANT ENVIRONMENT

- 4.1 In implementing the Anti-Corruption Policy, the STONUS Group is guided by the following principles for creating a corruption-resistant environment:

4.1.1 Zero tolerance for corruption

The STONUS Group follows a zero-tolerance approach to corruption in its activities, does not tolerate any form of corruption or related conduct, and commits to implementing measures to prevent corruption in all its forms.

4.1.2 Leadership by example

It is the responsibility of every manager to promote appropriate conduct by creating and maintaining a corruption-resistant environment and to ensure that the provisions of the Policy are properly implemented within the areas under their responsibility.

4.1.3 Avoidance of conflicts of interest

Employees must avoid any conflict of interest that could negatively affect the impartial and objective performance of their duties and functions, and must perform their duties with integrity, not using their position for personal gain or for the benefit of related persons.

4.1.4 Zero tolerance for bribery

The STONUS Group does not tolerate any form of bribery – giving or receiving a bribe, promising or agreeing to accept a bribe, demanding or soliciting a bribe.

4.1.5 Gifts Policy

The STONUS Group acknowledges that, for some of its business partners or other entities, it is customary to occasionally offer small-value gifts to a STONUS Group Employee with whom the partner or other entity has business relations. However, the STONUS Group emphasizes that such gifts must not influence the Employee's business decisions and/or create the impression that a business partner or other entity may improperly influence the decisions of a STONUS Group Employee or the STONUS Group itself. STONUS Group Employees are strictly prohibited from directly or indirectly requesting gifts.

To ensure clarity, the STONUS Group has adopted a Gift Policy, and all Employees are familiarized with its provisions.

4.1.6 Relations with foreign officials

Employees working with officials of foreign countries or operating in foreign countries must adhere to the principles of zero tolerance of corruption and comply with the provisions of the Policy. Facilitation payments are strictly prohibited, regardless of local practices or applicable laws.

5 REPORTING PROCEDURE

5.1 Employees of the STONUS Group, business partners, and other related persons are encouraged to report any observed or suspected cases of corruption, conflicts of interest, or other violations of the Policy.

5.2 Reports may be submitted as follows:

- by completing the incident or unsafe situation registration [form](#) available on the Company's website;
- by email to pranesk@vlantana.lt, using the reporting form available on the Company's website <https://vlantana.eu> under the Social Responsibility section;
- by post to Dvaro str. 1, Gobergiškė, Klaipėda district, Lithuania, indicating on the envelope: "Confidential: Vlantana Financial Crime Risk Management Group".

5.3 Reports received are reviewed by Employees designated to perform the functions of a competent entity and who ensure the proper assessment of the received information and the adoption of appropriate decisions.

- 5.4 The STONUS Group undertakes to protect the confidentiality of whistleblowers and to take all necessary measures to ensure that persons who report violations do not incur any adverse consequences as a result of their reports.
- 5.5 Persons who have submitted notifications may be subject to protection, promotion and assistance measures in accordance with the procedure established by the Law on the Protection of Whistleblowers of the Republic of Lithuania and other legal acts.

6 FINAL PROVISIONS

- 6.1 All current and newly hired Employees are required to familiarize themselves with the Policy and comply with its requirements.
- 6.2 Employees shall be familiarized with the Policy in accordance with the procedure established within the STONUS Group for communicating work-related information to Employees.
- 6.3 Employees are provided with periodic training on corruption prevention.
- 6.4 A breach of the provisions of this Policy may be considered a gross breach of work duties, for which Employees may be held liable in accordance with applicable laws.
- 6.5 UAB „STONUS Group” shall periodically, at least once a year, review the Policy and update it if necessary. Employees shall be informed of any amendments to the Policy.
- 6.6 The Head of the Human Resources division of the Administration Department of UAB “Vlantana”, a company of the STONUS Group, is responsible for ensuring that Employees are familiarized with the Policy.