

ANTI-BRIBERY AND CORRUPTION POLICY

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Approved by: Tomas Rutkauskas, UAB Baltsoft CEO

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1.0	2021.06.11	Henrikas Šavela	Initial document creation

1. ABOUT THIS POLICY

1.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

1.2 Any employee who breaches this policy (or the spirit of this policy) will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. WHO MUST COMPLY WITH THIS POLICY?

2.1 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives, business partners and any other person associated with UAB Baltsoft.

3. WHAT IS BRIBERY?

3.1 **Bribe** means a financial or other inducement or reward for action, which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit that is intended to influence a decision or action.

3.2 **Bribery** includes offering, promising, giving, accepting or seeking a bribe.

3.3 **Corruption** means any form of abuse of power for business and/or personal gain and may include, but is not limited to, Bribery.

3.4 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with the CEO of UAB Baltsoft.

3.5 Specifically, you must not:

1. give or offer any payment, gift, hospitality or other benefit in the expectation or hope that a business advantage will be received in return, or to reward any business received;
2. accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
3. give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
4. engage in any other activity that might amount to Bribery or Corruption or otherwise lead to a breach of this policy.

3.6 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

4. GIFTS AND HOSPITALITY

4.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

4.2 UAB Baltsoft recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

4.3 A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

4.4 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in the company name, not your name.

4.5 Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

5. RECORD-KEEPING

5.1 You must declare and keep a written record of all hospitality or gifts given or received of value more than 100 Eur. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

5.2 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness.

Accounts must not be kept "off-book" to facilitate or conceal improper payments.

6. HOW TO RAISE A CONCERN

6.1 If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your line manager or report it to the CEO of UAB Baltsoft.

6.2 The prevention, detection and reporting of any form of Bribery and Corruption are the responsibility of all Employees. You must notify the CEO of UAB Baltsoft as soon as possible if you are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

6.3 If you encounter any of these red flags while working for us, you must report them promptly to the CEO of UAB Baltsoft:

1. You become aware that a Third Party engages in, or has been accused of engaging in, improper business practices.
2. A Third Party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us.
3. A Third Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
4. A Third Party requests that payment is made to a country or geographic location different from where the Third Party resides or conducts business.
5. A Third Party requests an unexpected additional fee or commission to "facilitate" a service.
6. A Third Party requests that a payment is made to "overlook" potential legal violations.
7. A Third Party requests or requires the use of an Agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
8. You are offered an unusually generous gift or offered lavish hospitality by a Third Party.