



Approved by:

CEO of the company Linas Karzinauskas
Dated 01-02-2023

ANTI-MONEY LAUNDERING, ANTI-BRIBERY AND CORRUPTION POLICY

This Anti-Money Laundering, Anti-Bribery and Corruption Policy (hereinafter – Policy) applies to KG Constructions UAB and its related companies.

I. General Statement

We recognize the importance of preventing money laundering and terrorism financing and is committed to the highest standards of Anti-Money Laundering and Combating Terrorist Financing. We commit to abide by national and international anti-bribery, anti-corruption and anti-money laundering regulations, as well as any relevant ethics standards. We will ensure that this policy is reviewed periodically, communicated and accessible to all staff, including, directors, executives, management, supervisors, and staff, whether directly employed, contracted or otherwise representing the company and is publicly available, upon request.

This policy is aimed to prevent any company or individual from using our company for money laundering or terrorist financing activities and to prevent any employees, directors, business partners, contractors, consultants or advisers of our company from committing bribery or corruption. This policy requires any company or individual acting by our name detecting suspicious activity to report it immediately to the relevant authorities.

II. Definitions

Money Laundering is the process of any activity by which criminally obtained money or other assets (criminal property) are exchanged for “clean” money or other assets with no obvious link to their criminal origins.

Terrorism Financing is defined as providing, depositing, distributing or collection funds, directly or indirectly, intended to be used, or knowing that these funds are to be wholly or partially use, for the committing of terrorist acts.



Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

Corruption is the abuse of entrusted power or position for private gain.

III. Scope and Policy Guidelines

Our representatives are strictly prohibited to directly or indirectly place, offer, promise to give or obtain bribes to inappropriately influence business operations or reward an achieved business or personal advantage.

No payments, valuable gifts, lavish entertainment and hospitality, or favours or advantages offered by a third party, will be accepted or requested by our representatives for their personal use, or any other use not related directly to our company. Payments, hospitality or other services and favours accepted on behalf our company but received outside normal our company administrative procedures shall be reported clearly to our management at the earliest convenient moment.

Our company will not offer, provide, promise to give, or negotiate about any payment, gift, hospitality, favour or advantage to government officials and foreign public officials aimed at improperly influencing standard procedures or business performance.

Facilitation payments in order to obtain services, decisions or agreements, other than formally approved and publicly announced fees, are illegal and shall not be provided by our representatives.

It is forbidden for any our representative, and especially for company management, to threaten or exert undue pressure on any representative who has refused to take part in bribery activities or other corrupt behaviour, or who has communicated concerns about behaviour of others.

IV. Misconduct and Sanctions

Any violation of the terms in this policy by any our representative may be subject to disciplinary action, and in extreme cases to immediate termination of employment and/or a claim for payment of a damage. The same applies to any our representative knowing about any past or potential violations and failing to report those accordingly.