



Approved by:

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

MEASURES FOR THE IMPLEMENTATION OF THE PRINCIPLES OF IMPLEMENTATION AND ENFORCEMENT OF THE EQUAL OPPORTUNITIES POLICY OF KG CONSTRUCTIONS GROUP UAB

I. General provisions

1. Measures for the Implementation of the Principles of Implementation and Enforcement of the Equal Opportunities Policy of KG Constructions Group UAB (hereinafter - the Policy) governs the measures for gender equality and non-discrimination of employees of KG Constructions Group UAB (hereinafter - the Company) based on gender, race, nationality, language, origin, social status, health condition, belief, convictions or views, membership in a political party or association, age, sexual orientation, disability, ethnicity, religion, intent to have a child, circumstances not related to the employee's business qualities and the procedures for their implementation, as well as cases of violation of equal opportunities.
2. This Policy has been prepared in accordance with Article 26 of the Labour Code of the Republic of Lithuania, the Law on Equal Opportunities of the Republic of Lithuania and the Law on Equal Opportunities for Women and Men of the Republic of Lithuania, and other normative legal acts establishing equality of persons and prohibition to restrict human rights on discriminatory grounds.
3. The provisions of this Policy shall apply to the extent that they do not contradict the provisions of regulatory enactments.
4. The terms used in this Policy shall be understood as defined in the Law on Equal Opportunities of the Republic of Lithuania and the Law on Equal Opportunities for Women and Men of the Republic of Lithuania.
5. The Company shall act in strict accordance with the principles of gender equality and non-discrimination on other grounds. All employees of the Company, regardless of their position, must unconditionally follow the principles set forth in this paragraph.
6. This Policy aims to:
 - 6.1. Protect the Company's employees from possible violations of the principles of gender equality and non-discrimination on other grounds and to create a respectful work environment;
 - 6.2. Identify actions that are considered violations of this Policy;
 - 6.3. Inform the Company's employees about their rights;
 - 6.4. Determine the responsibilities of the Company in implementing this Policy;
 - 6.5. Establish an effective procedure for investigating possible infringements.
7. In order to ensure the implementation of the principles and rules set forth in this Policy, the Company shall indicate that the person responsible for monitoring the implementation of the Equal Opportunities Policy in the Company is the Human Resources Manager. Employees are informed about the Authorized Person and his / her contacts by the Company.



II. Obligations of the company in implementing the equal opportunities policy

8. In implementing the principles of gender equality and non-discrimination on other grounds, the Company, irrespective of gender, race, nationality, language, origin, social status, age, sexual orientation, disability, ethnic affiliation, political affiliation, religion, faith, convictions or views, intention to have a child/children, or on other grounds established by laws, shall:
 - 8.1. Apply equal selection criteria and conditions to the recruitment of persons;
 - 8.2. Create equal working conditions, opportunities to improve qualifications, pursue professional development, retrain, gain practical work experience, as well as receive equal benefits and other benefits provided to the Company's employees;
 - 8.3. Use equal work evaluation criteria and equal criteria for dismissal from work;
 - 8.4. Pay the same remuneration for the same work or work of the same value;
 - 8.5. Take measures to prevent harassment at the workplace;
 - 8.6. Take measures to prevent the employee from being sexually harassed;
 - 8.7. Take measures to ensure that employees are not discriminated against and no instructions are given to discriminate;
 - 8.8. Take measures to ensure that an employee who has lodged a complaint of discrimination or is involved in a case concerning discrimination, is not prosecuted and is protected from hostile behaviour or adverse consequences;
 - 8.9. Take appropriate measures for conditions to be created for people with disabilities to get a job, work, pursue a career or study, including the adequate adaptation of premises, provided that the duties of the employer are not disproportionately burdened by said measures.
9. In the job advertisements, the Company does not specify requirements that take precedence based on gender, race, nationality, language, origin, social status, age, sexual orientation, disability, ethnic affiliation, political affiliation, religion, faith, convictions or views, intention to have a child/children. Job advertisements do not require job seekers to provide information about their private lives or family plans.

III. Rights and obligations of employees

10. All employees must respect the principles of gender equality, non-discrimination and respect for each other, including but not limited to:
 - 10.1. Treat each other with respect and fairness, to respect the rights of all colleagues to privacy and dignity;
 - 10.2. Make every effort to ensure that the Company has a friendly and respectful environment in which all employees would enjoy working;
 - 10.3. Not tolerate discrimination;
 - 10.4. Adhere to manners of language and behaviour that do not create an offensive or hostile work environment, do not make others feel harassed, discriminated against or humiliated;
 - 10.5. When communicating with colleagues, not use uncensored words, express criticism / observations on work issues to colleagues constructively, politely and non-insultingly, try not to criticize colleagues in public, but express remarks in person;
 - 10.6. Be intolerant and not encourage observed cases of discrimination or harassment;



Refrain from any actions that would violate the rights of other employees, company partners, interested parties, customers.

11. Employees have the right and obligation to immediately inform the Company of any observed violations of the principles of gender equality and non-discrimination, regardless of whether such actions are performed against the employee or other employees. The information must be provided to the Authorized Person in accordance with the procedure established in the Policy.
12. Employees must cooperate with the Company in implementing the principles set out in this Policy and investigating possible violations.

IV. Breaches of the equal opportunity principle

13. Violation of this Policy shall mean any act or omission, whatever its form (including, but not limited to, verbal, written, physical, etc.) that violates the principles, measures enshrined in this Policy. A violation can be directed both, against one person and against a group of persons.

V. Measures for the implementation of the principle of equal opportunities and prevention of infringements

14. By implementing the obligations provided for in sub-paragraphs 8.1–8.9 of this Policy, the Company shall encourage employees not to tolerate violations of gender equality and discrimination and report them, inform employees about the possibilities of redress, cooperate with employees, taking into account the opinion of employees, take other measures to clarify the reasons for violation of the principle of gender equality and/or discrimination in the Company and prevent such cases from recurring in the future and apply sanctions
15. The Company shall oblige the heads of the divisions to promote a friendly, respectful and pleasant work environment in which discrimination or any form of harassment is not tolerated. Heads of units must monitor the psychological atmosphere in the units and react immediately if possible violations of the principles set out in this Policy are observed.
16. The Company shall encourage employees to express their opinion on possible improvements in working conditions.

VI. Investigation of violations of the principle of equal opportunities

17. Every employee of the Company, regardless of his/her position, who feels a violation of the principle of equal opportunities or discrimination, has the right and obligation to notify the Authorized Person by submitting a complaint orally or in writing. The complaint must specify: the employee's place of work, the essence and factual circumstances of the violation, the date (period) of the violation, the violator (if the actions of a particular person are complained about).
18. The Company shall promptly, but not later than within 20 days from the receipt of the information, investigate all notifications received regarding possible violations of the principles set out in the Policy.



19. If the complaint submitted by the employee does not comply with the requirements specified in Clause 17 of the Policy (there are defects), the Authorized Person informs the employee who submitted the complaint (except in the case of an anonymous complaint) about the identified deficiencies and proposes to correct them.
20. When investigating a complaint, the Company as far as possible in the specific case shall take measures to ensure the rights of the person who submitted the complaint (protect the confidentiality of the fact of the complaint and its content, take measures to suspend the execution of a possible violation, etc.).
21. After investigating the complaint, the Company no later than within 5 working days shall inform the employee about the results of the investigation and the decisions made (if any).
22. If it is established that the violation referred to in the complaint has been confirmed, the Company shall take measures to eliminate the identified violation and / or its consequences and shall take measures to punish the violator (if any).
23. The Company shall investigate possible violations of the principles of gender equality and non-discrimination also in the absence of employee complaints, i.e. if it receives information about a possible violation of equal opportunities in the Company in other ways (e.g. from customers, public sources, suggestions, remarks of other employees, institutions, etc.).

VII. Final provisions

24. Employees should be aware that breaches of this Policy may be subject to legal liability. Taking into account the seriousness of the violation and the consequences caused, persons who violate this Policy may be subject to administrative, criminal, civil and/or disciplinary liability in accordance with the procedure established by the legal acts of the Republic of Lithuania.
25. Violations of this Policy will also be considered breaches of employment duties. Employees may be dismissed for gross misconduct.
26. The Authorized person shall regularly (at least every 2 years) make an analysis of received employee complaints and of the results of their investigation in order to determine whether there are permanent cases of a similar nature in the Company and take measures to eliminate them.
27. The unit of the Company performing the personnel administration functions shall review, evaluate this Policy and, if necessary, amend its provisions at least once in 2 years.
28. This Policy is binding and applies to all employees of the Company, regardless of the type of employment contract and position held. This Policy is not a contractual obligation of the Company to its employees, but an internal document adopted at the Company's discretion. The Company has the right to change or revoke this Policy at its own discretion, to the extent that these rights are not restricted by the applicable mandatory Lithuanian laws, in accordance with the procedure established by legal acts. Employees will be notified of the acceptance, amendment, and revocation of this Policy in accordance with the procedure established by the Company. Other information related to the Company's equal opportunities policy is published on the information boards in the Company and (or) sent to the Company's employees by e-mail provided to them by the Company and hosted on the Company's server.
29. If the Company has a work council, the work council shall be informed before the approval / change / cancellation of the Policy and shall be consulted regarding the adoption / change / cancellation of this Policy.