



Approved by:

CEO of the company Linas Karzinauskas
Dated 28-02-2025

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Introduction

KG Constructions Group UAB ("the Company") is committed to conducting its business with integrity, transparency, and in compliance with all applicable laws and regulations of the regions in which we operate. As part of this commitment, the Company has established this Anti-Bribery and Anti-Corruption Policy to outline its stance against bribery and corruption in any form.

This Policy is followed by the Company and its subsidiaries and/or otherwise related undertakings.

Policy Statement

The Company unequivocally opposes bribery and corruption and is committed to preventing, detecting, and addressing any instances of bribery or corruption within its operations. Bribery, whether involving public officials, private individuals, or business partners, is unacceptable and will not be tolerated under any circumstances.

Scope

This Policy applies to all employees, contractors, consultants, agents, sub-contractors and representatives of the Company, regardless of their position or level within the organization. It also extends to any subsidiaries, joint ventures, or other entities over which the Company exercises control. Any policies in place locally at any subsidiary, joint venture or other entity which the Company exercises control shall also apply in that region.

Compliance with Laws and Regulations

The Company is committed to complying with all applicable anti-bribery laws and regulations, including but not limited to the Lithuanian Law on the Prevention of Corruption and the UK Bribery Act 2010. Employees and representatives of the Company must familiarize themselves with these laws and adhere to their provisions at all times.



Prohibited Conduct

The following activities are strictly prohibited and will result in disciplinary action, up to and including termination of employment or contractual relationship:

- Offering, promising, or providing bribes, kickbacks, or other improper advantages to any individual, entity, or government official, whether directly or indirectly.
- Soliciting, accepting, or receiving bribes, kickbacks, or other improper advantages from any individual, entity, or government official, whether directly or indirectly.
- The offering or giving of a facilitating payment (small payments or bribes made to expedite routine government actions or services).
- Facilitating or condoning bribery or corruption in any form, including through third parties such as subcontractors, suppliers, or consultants.
- Engaging in any activities that may create the appearance of impropriety, conflict of interest or compromise the Company's reputation or integrity.

Gifts and Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality or gifts of a modest value, so long as they comply with applicable laws and regulations, are given openly and not in secret, and are for legitimate business purposes such as building relationships, maintaining the Company's image or reputation, or marketing our products and services. Employees must always avoid situations where the giving or receiving of gifts or hospitality could be perceived as attempts to influence business decisions improperly. Employees must follow all gifts and hospitality procedures applicable to their location in relation to approvals and recording of any gifts and hospitality given or received.

No sub-contractor, agent, service provider, consultant or any other third party representing or providing services to the Company is permitted to provide or receive any form of gift or hospitality to or from any other third party on behalf of the Company.

Sales Intermediaries

The Company prohibits the use of sales consultants or intermediaries for the purposes of seeking out and securing new work. Any exceptions to this must be approved by the Company's Chief Executive Officer.



Reporting and Non-Retaliation

Employees are encouraged to report any suspected or actual instances of bribery, corruption, or other unethical conduct promptly using the Company's whistleblowing tool available on the Company's website or directly to the Company's Compliance Officer (Vytenis Malaškevičius vytenis.malaskevicius@kgcgroup.com). The Company prohibits retaliation against individuals who make good faith reports of misconduct.

Training and Awareness

The Company will provide regular training and awareness programs to ensure that employees understand their obligations under this policy.

Policy Review and Updates

This Policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations. Any updates or revisions will be communicated to all employees and stakeholders in a timely manner.

Closing Statement

By adhering to this Policy, employees and representatives will contribute to the Company's commitment to ethical business practices, integrity, and transparency. Together, we safeguard our reputation, build trust with stakeholders, and promote a culture of compliance and accountability. Integrity builds trust, trust builds relationships, and relationships drive success.

