

ESEMDA Code of Conduct

1. Requirement: Legality and Integrity

As Esemda, we are committed to a comprehensive approach to legality and integrity. This includes, in particular, that laws, regulations and standards as well as contractual obligations shall be reliably complied with and that violations, evasions or deceptive practices be avoided.

a. Compliance with Applicable Law as a Minimum Standard

We abide by the laws and other relevant regulations applicable in the places where we operate. If a delivery or service is intended for export, the delivery or service must also comply with the legal provisions of the country of destination.

b. Corruption (Public Sector/Private Sector)

We do neither actively participate in any corruption nor tolerate any corruption. We take active precautions against corruption and consistently punish any corruption that is identified. This also applies to actions or arrangements that serve or lend themselves to the concealment of corruption or the circumvention of the prohibition of corruption.

We expect our employees to behave with integrity, to make business decisions exclusively on the basis of objective criteria and, in particular, not to let themselves become influenced by donations from business partners or third parties. Benefits may only be offered or granted in exceptional cases if they are appropriate, socially adequate, customary and of low value. The applicable provisions of criminal law and tax law must be observed.

c. Antitrust Law

We do behave fairly in competition and refrain from unfair competition. In particular, we comply with applicable national and international antitrust laws and other laws regulating competition.

d. Export Control

We, whenever importing and exporting, comply with all applicable national and international regulations of foreign trade law, and to abstain from participating in any violations, evasions or deceptions.

e. Money Laundering

We comply with national and international money laundering laws in all transactions and other services arising from or in connection with business relationships.

ESEMDA, UAB

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f. Secrecy and Data Protection

We respect the trade or company secrets and property rights of third parties and treat exchanged documents, data, offers, and prices confidentially.

We store confidential company related and personal data and information that is not in the public domain carefully and in accordance with national and international regulations on the protection of business secrets and comply with the applicable laws on data protection.

2. Requirement: Human Rights and Working Conditions

Esemnda respect universal human and fundamental rights, especially in the working environment. In particular, Esemnda considers the principles of the International Labor Organization of the United Nations (ILO) as well as the substance of the UN Civil Pact and the UN Social Pact to form a global minimum standard.

a. Freedom of Association

We respect the right to freedom of expression and freedom of association of their workers within the framework of the laws applicable at their place of business and place of employment. Employees shall not be discriminated against for forming or participating in trade unions or interest groups, nor for advocating for their rights or for improvements in their situation or working conditions.

b. Working Hours

We comply with the laws in force at their place of business and place of employment regarding working hours, in particular the maximum number of hours per day/week. It is ensured that employees have sufficient days off for recreation.

c. Wages

We pay to our employees appropriately and adequately and comply with applicable minimum wage and compensation regulations. This also includes that overtime is paid according to the applicable laws/collective agreements.

d. No Child Labor

We abide by the regulations of the United Nations on human and children's rights. Esemnda does not tolerate child labor.

e. No Slavery or Forced Labor

We abstain from practicing, economically benefitting from, or accepting any slavery, slavery-like conditions or forced labor. Any involuntary labor or service that is required of a person under a threat of punishment, such as prisoners and detainees, is deemed to qualify as forced labor.

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f. No Discrimination

We treat all people and in particular their employees with respect, without prejudice, and, in particular, without discrimination. Any form of discrimination or disadvantage, especially on the grounds of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief must be avoided.

g. Natural Resources and Protection Against Encroachment

We respect and protect the natural resources of mankind. Harmful pollution of soil, or water, or of air as well as noise emissions or water consumption, which, for example, prevent the basic supply of food, access to clean drinking water, or the appropriate use of sanitary facilities, must be avoided.

3. Requirement: Occupational Safety and Health Protection

Esemnda ensures that humans can perform their work safely and without permanent physical impairment.

a. Healthy and Safe Working

We provide a healthy and safe working environment for our employees.
We recognize, and minimize, the risks of physical integrity hazards.

b. Accident Prevention

We organize our work, the performance of work and services in such a way that the occurrence of accidents is precluded as far as reasonably possible, and the consequences of accidents are minimized as far as possible.

4. Requirement: Sustainability (Environmental and Climate Protection/ Energy/Natural Resources)

Esemnda strives to have as little impact on the environment as possible and proactively support the protection of the environment and the preservation of natural resources.

a. Environmental Regulations

We behave responsibly with respect to protecting the environment and conserving limited natural resources, and fully comply with environmental laws.
We encourage our Clients, Suppliers, Partners to support us in possible further environmental protection measures beyond the scope of the legal regulations and to submit suggestions for more environmentally friendly products or production processes as well as for works and services.

b. Sustainability

We handle the available natural resources in such a way that the next generations will not have to suffer from the current consumption.

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