

## **CHANNEL FOR REPORTING VIOLATIONS**

In accordance with the requirements of the Law on the Protection of Whistleblowers of the Republic of Lithuania (hereinafter - **the Law**) and other legal acts regulating the protection of whistleblowers, UAB Graina (hereinafter - **the Company**) operates an internal channel for reporting violations (hereinafter - **the Channel**).

The channel is intended for the presentation of information regarding any criminal act, administrative offense, official misconduct or violation of work duties that may be prepared, committed or committed in any Company, as well as gross violation of mandatory norms of professional ethics, attempts to conceal said violations or other threats to the public interest or the rights of the person who violates it violation of which the person became aware of as a result of his or her service, employment relationship or contractual relationship with any Company or during employment or other pre-contractual relationship (hereinafter - **Violation**).

### **I. COMPETENT SUBJECT**

All Violation reports received through the Channel are examined by the Competent Subject appointed by the Company.

Competent Subject – Jovita Morkevičienė, UAB Graina Director for Management Services.

### **II. CONFIDENTIAL CONSULTATION**

A person who intends to provide or has provided information about a Violation may consult with the Competent Subject regarding the submission of a notification of a violation or the possible or negative impact on him related to the fact of providing information about the Violation.

Confidential consultations are provided by contacting [pranesimai@graina.lt](mailto:pranesimai@graina.lt).

### **III. REPORTING OF VIOLATION**

Notifications about possible Violations are submitted through the Channel - e-mail. at the e-mail address [pranesimai@graina.lt](mailto:pranesimai@graina.lt).

The notification can be submitted in free form or by filling out the standard Violation Notification form (attached)

Please note that when submitting a report, it is necessary to specify and submit:

1. Information about who, when, in what way and what kind of violation they are planning to commit, are doing or have committed;
2. Information about the date and circumstances of learning about the violation;
3. Your name, surname, personal identification number or date of birth, if you do not have a personal identification number, workplace, other contact details;
4. Any available documents, data or information revealing signs of possible violation.

If all necessary information is not provided, the report will not be investigated and considered as a report of Violation, but this does not limit the right of the Competent Entity to take actions on its own initiative to prevent or terminate the violation in any Company.

All information received through the Channel is processed in accordance with the requirements of personal data protection and the principle of confidentiality, with the exception of exceptions and requirements provided for by law.

#### **IV. PROCEDURE FOR FILING AND RESEARCHING VIOLATIONS**

Within two working days from the submission of the notification, the person who submitted the information about the Violation will receive a confirmation of the receipt of the notification from the Competent Subject. The competent subject may ask the person who provided information about the Violation to provide additional or clarify the provided information. Within 10 working days from the confirmation of receipt of information, the Competent Entity will inform the person who submitted information about the Violation about the further steps of the investigation or the refusal to consider the report. During the entire investigation, the person who submitted information about the Violation can maintain contact with the Competent Subject and provide him with additional information, explanations or ask questions. If necessary, the Competent Subject will transfer the Violation to the competent authorities for investigation, and upon completion of the investigation, will inform the person who provided information about the Violation about the results of the investigation and the Company's actions.

#### **V. RIGHTS, WARRANTIES, REMEDIES AND LIABILITY OF THE PERSON PROVIDING INFORMATION**

The whistleblower has the right to confidentiality, non-infringement, compensation for valuable information, compensation, free legal aid, and immunity as provided by law. Providing information that constitutes a commercial (production) secret, professional secret, bank secret, confidential information or information about private life in accordance with the procedure established by law shall not be considered as such information being disclosed.

When a person who has provided information about a violation is adversely affected, this person can apply to the Competent Subject, as well as submit a report to the competent authority, which decides on the recognition of the person as a whistleblower, in accordance with the procedure provided by the Law. Persons recognized as whistleblowers may apply to the court for the consequences of negative impact measures.

Providing known false information, as well as information about a violation that constitutes a state, service or professional secret, does not give the person who submitted the information about the violation any guarantees according to the Law. A person who has provided known false information or disclosed a state, official or professional secret shall be liable in accordance with the procedure established by legal acts.

#### **VI. CHANNEL STATISTICS**

Information is being prepared and will be published later.