

**SCHEDULE OF PROCEDURES FOR DISCLOSURE OF INFORMATION ABOUT WRONGDOINGS
(WHISTLEBLOWING) AT UAB Integre Trans**

1. GENERAL PROVISIONS

- 1.1. The Schedule of Procedures (hereinafter the Schedule of Procedures) for Disclosure of Information about Wrongdoings at UAB Integre Trans (hereinafter the Company) shall set forth the procedure for the disclosure of information about the potential wrongdoings being prepared, already committed or taking place, for accepting the reports thereon, for evaluating the information about a wrongdoing provided therein and for decision-making in regards thereto. The provisions of the Schedule of Procedures shall apply to the information to be disclosed by the employees via the Company's internal whistleblowing channel.
- 1.2. **A wrongdoing** shall mean a potential criminal offence, administrative offence or disciplinary offence being prepared, taking place or already committed, including a gross violation of the binding regulations of professional ethics or another breach of law, which constitutes a threat to the public interest or which is in violation thereof, that the whistleblower have become aware of due to their current or past employment or contractual relationship with the Company. Information about wrongdoings shall be disclosed in order to protect the public interest. Disclosure of information in order to protect purely personal interests shall not be considered whistleblowing.
- 1.3. The disclosures received by the Company shall be accepted, recorded and investigated and the safeguards for the whistleblowers shall be ensured by virtue of the Law on Protection of Whistleblowers of the Republic of Lithuania, other legislation and the Schedule of Procedures.
- 1.4. The Company's internal whistleblowing channel may be used for disclosing information about wrongdoings by the person who is or has been in the employment or contractual relationship (advisory, contracting, internship, traineeship, volunteering, etc.) with the Company.
- 1.5. The Company manager and the employees, who receive, evaluate and investigate information relating to the persons and/or the Company's employees disclosing information about wrongdoings, must ensure the confidentiality of such persons with the exceptions provided in the laws.

2. DISCLOSURE OF INFORMATION ABOUT WRONGDOINGS

- 2.1. Any information about wrongdoings shall be disclosed in writing in a free format. A person disclosing information about a wrongdoing is advised to complete a report thereof in the form prescribed by the Company.
- 2.2. Information about wrongdoings shall be disclosed in relation to the following:
 - 2.2.1. risk to public safety or health or a person's life or health;
 - 2.2.2. environmental hazard;
 - 2.2.3. obstruction or unlawful influence over the investigations carried out by law enforcement institutions or over the courts in the administration of justice;
 - 2.2.4. financing of illegal activities;
 - 2.2.5. illegal or non-transparent use of public funds or assets;
 - 2.2.6. illegally acquired assets;
 - 2.2.7. concealment of the implications of a committed wrongdoing or obstruction of the scope of implications being identified;
 - 2.2.8. other offences.
- 2.3. A person may disclose the information about a wrongdoing:
 - 2.3.1. via the Company's internal whistleblowing channel;
 - 2.3.2. directly to the competent authority (the Prosecutor's Office of the Republic of Lithuania);

- 2.3.3. in public.
- 2.4. A person disclosing information about a wrongdoing shall submit a report thereof to the Company in the following ways:**
- 2.4.1. directly on the arrival to see the Company manager at the following address: Sporto str. 18, Vilnius;**
- 2.4.2. by sending a report to the Company's email at pranesk@integretrans.lt**
- 2.5. If a person disclosing information about a wrongdoing does not follow the requirements of the form approved by the Company, the report must state that it is being provided in accordance with the Law on Protection of Whistleblowers of the Republic of Lithuania. A person disclosing information about a wrongdoing shall provide the following in their report: who committed, is committing or is intending to commit a wrongdoing, when, how and the nature of the wrongdoing, etc., the date they learnt about the wrongdoing and the circumstances thereof, their forename, surname, personal number, employer and other contact details, and, where possible, shall provide any available documents, data or information outlining the elements of the potential wrongdoing.
- 2.6. Where a person has become aware of the elements of a potential criminal offence taking place or already committed, it shall be reported directly to the Prosecutor's Office of the Republic of Lithuania.
- 2.7. In addition, the person must contact the Prosecutor's Office of the Republic of Lithuania directly in the event of at least one of the below circumstances:
- 2.7.1. a wrongdoing is of material importance to the public interest;
- 2.7.2. it is necessary to prevent the wrongdoing or terminate it as soon as possible because it can cause considerable damage;
- 2.7.3. senior management in employment or contractual relationship with the Company are committing or have committed potential wrongdoings;
- 2.7.4. information about the wrongdoing has been disclosed via the internal whistleblowing channel, but no response was received or no actions were taken in response to the information disclosed, or the measures taken were ineffective;
- 2.7.5. there is reason to believe that should the information about the wrongdoing be disclosed via the internal whistleblowing channel the whistleblower's anonymity or the person's confidentiality may be compromised or efforts will be put to conceal the disclosed wrongdoing;
- 2.7.6. the Company does not have a functioning internal whistleblowing channel;
- 2.7.7. the person cannot use the internal whistleblowing channel because they are no longer in employment or other legal relationship with the Company.

3. ACCEPTING AND RECORDING REPORTS

- 3.1. The reports shall be accepted and recorded by the responsible employee of the Company appointed following an order of the Company manager.
- 3.2. A report received at an email other than the one referred to in paragraph 2.4.2 of the Schedule of Procedures shall not be recorded and shall be forwarded, without delay, to the responsible employee of the Company appointed by the Company manager, at the email provided in paragraph 2.4.2 herein. Any such report received and/or forwarded by email must be deleted, without delay, but not later than within 1 working day from forwarding it to the email referred to in paragraph 2.4.2 herein.
- 3.3. If a report is received by post, the employee that carries out document management functions shall not record the report, but transfer it to the responsible employee of the Company appointed by the Company manager.

4. EVALUATION OF INFORMATION DISCLOSED IN THE WHISTLEBLOWING REPORT AND DECISION-MAKING

- 4.1. The responsible employee of the Company shall evaluate all reports submitted.
- 4.2. Following the evaluation of the information provided by the person disclosing information about a wrongdoing, the responsible employee of the Company shall take the following actions:
- 4.2.1. if the information received gives reason to believe that a criminal offence, an administrative offence or another offence is being prepared, taking place or has been committed, the responsible

- employee of the Company shall forward, without delay but not later than within **2 working days** of the day the information was received, the received information about the potential offences to the body authorised to investigate such information, without the consent of the person disclosing the information about a wrongdoing and shall notify the person thereof;
- 4.2.2. within **5 working days** after the written information about the wrongdoing was received, notify the person disclosing such information of the decision taken in relation to the investigation of the information. The decision not to investigate the information about a wrongdoing must be reasoned.
- 4.3. Following the completion of the investigation of the information about a wrongdoing, the responsible employee of the Company shall inform, without delay and in writing, the person disclosing information about a wrongdoing of the decision taken, the outcome of the investigation and the actions taken or anticipated, and shall detail the procedure for making an appeal against the decision. In cases where a wrongdoing has been identified, the responsible employee of the Company shall inform the person disclosing information about the wrongdoing of the liability imposed on the wrongdoers.
- 4.4. A decision not to investigate the information about a wrongdoing may only be taken in the following cases:
- 4.4.1. the report is based on clearly false information;
- 4.4.2. the person has contacted the Company in connection with the same set of circumstances, where the information about the wrongdoing had already been investigated following the procedure established in the present Schedule of Procedures and had a decision taken in connection therewith.
- 4.5. A person disclosing information about a wrongdoing may consult the responsible employee of the Company in relation to the potential or exerted adverse influence over them in connection with the information about a wrongdoing being disclosed, on the legal remedies or means available to them, also, by virtue of paragraph 2 of Article 11 of the Law on Protection of Whistleblowers of the Republic of Lithuania, they may make an application, to the competent authority, for the whistleblower status to be awarded.
- 4.6. In cases where the person disclosing information about a wrongdoing has not received a response or the Company has taken no actions in response to the disclosed information, they shall be entitled, by virtue of subparagraph 4 of paragraph 3 of Article 4 of the Law on Protection of Whistleblowers of the Republic of Lithuania, make an application directly to the competent authority – the Prosecutor’s Office of the Republic of Lithuania and submit a report of the wrongdoing in the prescribed form.

5. RESPONSIBLE EMPLOYEE OF THE COMPANY

- 5.1. The Company manager shall appoint a responsible person of the Company that shall manage the internal channel in the Company. A person whose reputation and qualifications are beyond doubt as regards their ability to implement the provisions of the Schedule of Procedures in a proper manner shall be appointed the responsible employee of the Company. The responsible employee of the Company implementing the requirements of the Schedule of Procedures may not be subject to any influence and may not be otherwise precluded from performing the functions provided in the present Schedule of Procedure.
- 5.2. When implementing the requirements of the Schedule of Procedures, the responsible employee of the Company shall carry out the below functions:
- 5.2.1. analyse and investigate the information about wrongdoings received via the internal channel;
- 5.2.2. ensure the confidentiality for the person disclosing information about a wrongdoing via the internal channel;
- 5.2.3. cooperate with the Company’s employees, departments and competent authorities providing and/or receiving the necessary information;
- 5.2.4. collect and store anonymised statistics about the number of the reports received and the outcome of their investigation;
- 5.2.5. perform other functions set forth in the Schedule of Procedures.
- 5.3. When undertaking the functions attributable to them, the responsible employee of the Company shall have the right to:
- 5.3.1. obtain the necessary information and data from the Company’s employees and departments other than those subordinate to them;

- 5.3.2. when investigating the information about a wrongdoing received via the internal channel, take decisions relating to the investigation, which shall be binding on all of the Company's employees and departments.
- 5.4. The information about the appointed responsible employee of the Company, their contacts as well as about the procedure for disclosing and investigating information about wrongdoings shall be published on the Company's intranet.

6. ENSURING CONFIDENTIALITY

- 6.1. The responsible employee of the Company shall ensure, from the moment the report is received, that the information about a wrongdoing received and any data associated with it, are kept securely and only authorised persons investigating the wrongdoing have access thereto.
- 6.2. Confidentiality shall be ensured regardless of the outcome of the investigation of the information about a wrongdoing received.
- 6.3. Confidentiality shall not be required where the person disclosing information about a wrongdoing requests so in writing or where the information disclosed by them is known to be false.
- 6.4. The provision of details and other information about the person disclosing information about a wrongdoing to pre-trial investigation or other competent authorities investigating offences, without disclosing these details within the Company, shall not be considered a breach of confidentiality. Upon receiving information about a wrongdoing via the internal channel, the responsible employee of the Company shall, provided the disclosing person requests so, notify the person, without delay and in writing, of the fact that such information has been received.

7. FINAL PROVISIONS

- 7.1. It shall be prohibited to take any of the following adverse measures against the person disclosing information from the date of the disclosure of the information: to dismiss them from work, to demote or transfer them to another job, to intimidate, harass, discriminate against or threaten them, to restrict their career opportunities, to cut their salary, to change their working time arrangements, to cast doubt on the competence, to share adverse information about them with third parties or to invoke any other adverse measures.
- 7.2. It shall also be prohibited to cause adverse effect on the family members of the person disclosing information about a wrongdoing, who work for the Company or for another legal person, which is subordinate to the Company, where a family member of the person disclosing information about a wrongdoing may suffer detriment as a result of the disclosure of information about a wrongdoing.
- 7.3. The person shall not suffer, as a result of the disclosure of information about a wrongdoing, any contractual or non-contractual (delictual) liability, including any liability for defamation or libel, where, disclosing the information about a wrongdoing under the Law on Protection of Whistleblowers of the Republic of Lithuania and the present Schedule of Procedures, they reasonably believed that they were disclosing true information.
- 7.4. The person shall be held liable for the damage caused by the disclosure of information about a wrongdoing only in the event where it has been proved that the person could not reasonably believe that the information to be disclosed was correct. A person who has disclosed the information known to be false or a commercial secret shall be held liable in accordance with the procedure established in the legislation.
- 7.5. The present Schedule of Procedures shall enter into force from the date it was approved and may be modified or supplemented by an order of the Company manager.
- 7.6. The responsible employee of the Company, who manages the internal channel in the Company, shall be made familiar with the present Schedule of Procedures against their signed acknowledgement, whereas other employees of the Company shall make themselves aware of the Schedule of Procedures, against their signed acknowledgement, when it is published on the Company's intranet.

REPORT OF WRONGDOING

_____ 20 ____

 (place)

Whistleblower's details	
Forename and surname	
Personal number	
Employer (current or past employment or contractual relationship with the Company)	
Position	
Telephone (notes for contact to be made)	
Personal email or residence address	
Information about the wrongdoing	
1. What wrongdoing are you disclosing? What is the nature of the wrongdoing?	
1. Who committed the wrongdoing? What motives could the person have had when committing the wrongdoing?	
2. Place and time of the wrongdoing.	
Details of the wrongdoer or wrongdoers	
Forename and surname	
Employer	
Position	
3. Are there any other persons that were involved or could have been involved in the wrongdoing? If so, please detail who they are.	
4. Are there any other witnesses of the wrongdoing? If so, please provide their contact details.	
Details of the witness or witnesses of the wrongdoing	
Forename and surname	
Position	
Employer	
Telephone	
Email	
5. When was the wrongdoing committed and when did you learn about or notice it?	

6. What details supporting the wrongdoing, which may assist the investigation of the wrongdoing, could you provide? Please detail the enclosed written and other information about the wrongdoing.
7. Have you reported the wrongdoing to anyone else? If so, who did you report it to and have you received any response? If you have received a response, please give the substance of it.
8. Additional observations and comments.

I hereby represent that I am familiar with the legal implications for providing false information and that the information I have provided is correct.

Date	Signature
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