

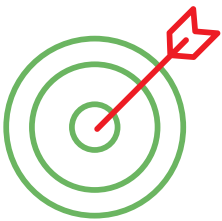
BARBORA



CORRUPTION
PREVENTION
POLICY

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PURPOSE

The purpose of the Policy is to lay down the main principles and requirements of the Company for the prevention of Corruption and the guidelines for ensuring compliance with them, the implementation of which creates the preconditions and facilitates the implementation of the highest standards of transparent conduct of business across the Company.



TARGETED AUDIENCE

The Policy applies to all Employees of the Company, including members of the management and supervisory bodies and committees, persons employed under civil contracts and persons holding positions on any other basis, irrespective of the form of their relationship with the Company and their remuneration.

TERMS AND DEFINITIONS



COMPANY

UAB Barbora and legal entities directly and indirectly controlled by it.



EMPLOYEE

Person, who works or holds a position with the Company under an employment contract, a civil contract or on any other basis, including members of management and supervisory bodies and committees, regardless of the form of the person's relationship with the relevant entity and his/her remuneration.



GIFT

Any item, service or other benefit of whatever value, which is received or given gratuitously (e.g., money, beverages, tickets, invitations, discounts, trips, services, accommodation, hospitality, etc.).



CONFLICT OF INTERESTS

Situation when the Employee, in the performance of his/her duties, makes or participates in making a decision, or carries out an assignment, which involves the private interests of the employee or of his/her close person.

TERMS AND DEFINITIONS



CORRUPTION

Abuse of power entrusted by the Company for individual or third party gain.



POLICY

This Corruption Prevention Policy.



FOREIGN COUNTRY

Any foreign country other than the country in which the Company operates, including all institutions of the foreign country from the municipal to the national level. The term of a foreign country also extends to international organisations.



FOREIGN OFFICIAL

Person holding an office with foreign public authorities that have legislative powers, exercise public administrative functions, including, but not limited to, judicial authorities, irrespective of whether the person is elected or appointed to the office. In addition, a person who holds an office with a legal entity or an international organisation in a foreign country is considered to be the foreign official.



COMMITMENT TO CORRUPTION PREVENTION

The Company does not tolerate Corruption in any form and will take measures to prevent manifestations of Corruption within the Company.

Compliance with legal provisions and standards of conduct:



In performing their activities, the Company and its Employees comply with all laws and regulations applicable to the Company, including those governing the prevention of Corruption.



Where the Policy, laws or regulations do not prescribe the relevant standards of conduct, the Company and its Employees must behave in a manner consistent with the highest standards of reliability, honesty and transparency acceptable to society.

COMMITMENT TO CORRUPTION PREVENTION

Disclosure of information and transparent accounting:



The Company's accounting must be kept accurately and reflect fairly all economic transactions and events in strict compliance with all applicable legal acts and local business accounting standards / international financial reporting standards.



The Company's records must be accounted and maintained accurately and correctly in strict compliance with all applicable legal acts. The Company does not tolerate and prohibits any actions involving destruction, mutilation, distortion of original documents or any other impact on them.

COMMITMENT TO CORRUPTION PREVENTION

Principle of zero tolerance of Corruption

In its business activities, the Company is guided by the principle of zero tolerance of Corruption. The principle of zero tolerance of Corruption is applied in relations with both the public and the private sector.

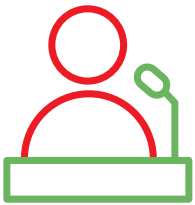


The Company does not tolerate any form of Corruption or corruptive acts within the meaning of laws and other legal acts and the Policy applicable to the Company, including forms of Corruption such as bribery, graft, trading in influence, facilitation payment, or any other acts whereby bribe, graft, influence peddling, facilitation payment, or concealment of any such corruptive acts are sought or demanded.

The Company's business partners, suppliers and other related third parties must also act on the basis of ethical and responsible business principles and comply with the anti-Corruption provisions stipulated by applicable legal acts.



PROVISION OF SUPPORT



The Company refrains from any form of influence, whether direct or indirect, and does not finance or otherwise support politicians, political parties and/or movements, their representatives or candidates, election campaigns, foundations or other organisations established by politicians (or their related persons).

The Company is responsible for granting aid in accordance with provisions of applicable legal acts and internal regulations.

GIFTS AND OTHER BENEFITS



The Company accepts and offers only such businesses Gifts that do not go beyond the standards of normal business relationships and transparency. The Company does not tolerate any Gifts, payments or hospitality that would encourage or reward a decision, or to gain favour or exclusive treatment in any activities pertaining to the Company.

Employees are prohibited from requesting, directly or indirectly, any Gifts from third parties in connection with their position within the Company. Gifts or business hospitality may only be offered or accepted if this is done with due regard to legal acts, the Policy and internal regulations of the relevant group company.

The Company accepts invitations to events, meals and entertainment only when it has good business reasons to attend such events and such hospitality is customary and generally acceptable, is not of excessive value and is given and accepted without any express or implied obligation on the part of the recipient of hospitality to its giver. Travel, accommodation and other expenses in connection with such hospitality are borne by the Company.

The Company establishes the rules for acceptance, receipt, provision and treatment of Gifts for its Employees.



CONFLICT OF INTERESTS



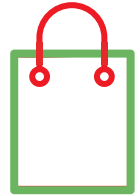
The Company's business decisions and actions are based on the principle of maximum benefit for the Company. Employees must avoid any Conflict of Interests which could adversely affect the impartial and objective performance of their duties or functions.

The working equipment, financial and material resources, internal and confidential information of the Company may be used the Employees only for the performance of their direct duties, unless other use is expressly regulated in writing.

The Company establishes the Conflict of Interest declaration procedure applicable to its Employees and the measures to avoid and manage the Conflicts of Interests.

PROCUREMENT

The Company ensures that all procurement is carried out transparently, according to the requirements of equality, non-discrimination, mutual recognition, proportionality and impartiality. The Company must have in place the internal control mechanism to ensure that these requirements are met.



NEPOTISM AND CRONYISM



The Company does not tolerate patronage of family members and relatives (nepotism), friends and other related persons (cronyism), or relationships of direct subordination or control between such persons. Employees are selected in a non-discriminatory, transparent and fair manner, on the basis of their competences and in accordance with legal acts.

FOREIGN OFFICIAL

Employees who cooperate with Foreign Officials or work in a foreign country must adhere to the principles of zero tolerance for Corruption and the provisions set out in this Policy, regardless of whether or not the liability for Corruption is established in the foreign country.



POLICY IMPLEMENTATION, SUPERVISION AND CONTROL

Members of the management bodies and heads of structural units of the Company through their conduct must shape the standard of conduct provided for in this Policy and ensure that activities in the areas of their responsibility are carried out in accordance with its provisions.



Management of the Company is responsible for ensuring that the Policy is properly communicated to the Employees of the Company.

POLICY IMPLEMENTATION, SUPERVISION AND CONTROL

The Company must designate a person responsible for the supervision and control of the Corruption prevention issues.



In order to ensure the effective and timely implementation of the Policy, the Company periodically organises training and consultations for Employees in order to increase their anti-corruption awareness and to promote anti-corruption practices. The person designated by the Company as responsible for the supervision and control of the Corruption prevention issues is in charge of the development, implementation and organisation of the training programme and consultations.



In order to ensure the implementation of provisions of the Policy, the prevention of violations, as well as the transparency and trust, the Company has established the helpline for reporting violations of the Policy and obtaining the necessary information related to its implementation.

POLICY IMPLEMENTATION, SUPERVISION AND CONTROL

Having received a report on possible violations of the Policy and suspicions concerning other related legal entities, the Employee of UAB Barbora, who performs Corruption prevention functions, must conduct the initial investigation and communicate its results to the CEO of UAB Barbora.



The Company supports the Employees, who report possible cases of Corruption and other violations of this Policy, such as giving or receiving, promising, offering, soliciting an undue reward, a Conflict of Interests, etc. The Company guarantees the confidentiality of such persons and protection of their personal identity as provided for by respective legal acts.

The Company ensures that all possible breaches of this Policy are properly investigated and dealt with by authorised and competent persons. The investigation results, conclusions and proposals are communicated to the respective members of the management bodies of UAB Barbora and related legal entities.



POLICY IMPLEMENTATION, SUPERVISION AND CONTROL

The Company aims to ensure that all its suppliers, contractors, subcontractors, consultants, agents, intermediaries, beneficiaries and other business partners comply with the requirements of this Policy, and, to this end, posts this Policy on its internet website.



Violation of provisions of this Policy is considered to constitute a serious breach of labour discipline, which may lead to imposition of disciplinary liability. If any indications of a criminal offence are discovered, the Company informs the relevant law enforcement bodies.

The Policy applies to UAB Barbora directly and to other directly or indirectly controlled legal entities – after its approval by the respective legal entity's manager.

