

VIOLENCE AND HARASSMENT PREVENTION POLICY

Company's name:	AKROPOLIS GROUP, UAB
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Version:	3.

DOCUMENT CHANGE HISTORY

Version	Date	Brief description of the changes
1.	21 December 2022	First version of the document
2.	8 January 2025	The document was supplemented according to newly established legal acts, including the addition of paragraphs 9.2, 9.3, and the addition of paragraph 10
3.	28 January 2025	Supplemented paragraph 9.2

1. AKROPOLIS GROUP, UAB (the **Company**), with a view of creating a working environment in which employees do not experience hostile, unethical, humiliating, aggressive, insulting, or offensive actions which encroach on the honour and dignity, physical or psychological integrity of an individual employee or a group of employees, or which are aimed at intimidating, degrading an employee or their group or placing them in a helpless or powerless situation, has adopted this *Violence and Harassment Prevention Policy* (the **Policy**).
2. The Policy has been prepared in accordance with the Labour Code of the Republic of Lithuania (the **Labour Code**), the recommendations of the State Labour Inspectorate, the Description of Measures for the Prevention of Violence and Harassment at Work approved by the Order No. EV-221 of the Chief State Labour Inspector of 17 December 2024 "On the Approval of the Description of Measures for the Prevention of Violence and Harassment at Work", the Law of the Republic of Lithuania on Safety and Health at Work, and other applicable legal acts. The Policy applies to all employees of the Company without exception, regardless of their official duties or the type of their employment contracts.
3. The Policy determines methods of recognizing/identifying violence and harassment, possible forms of violence and harassment, the procedure for reporting and examining cases of violence and harassment, protective measures for, and the assistance provided to, persons reporting violence and harassment or victims of violence and harassment, rules of conduct for employees, and other information related to the prevention of violence and harassment.
4. The purpose of this Policy is to encourage and help employees to report their concerns. No employee should have doubts or fear for their position in the Company when reporting a concern. No retaliation or reprisals against a person who makes a report under this Policy is a fundamental principle.
5. To ensure that employees understand the main concepts of the Policy, the manifestations and forms of violence and harassment, the main definitions which provide the necessary information in detail so that employees have sufficient knowledge to comply with and apply the Policy, are presented in this Policy below:

The Labour Code establishes:

Violence and harassment, including psychological violence, violence and harassment on the basis of gender (violence and harassment against persons on the basis of their gender or disproportionately affecting persons of a particular gender, including sexual harassment), is any unacceptable conduct or a threat of such conduct of the employer (natural person or the manager of legal entity) or other employees, regardless of whether the unacceptable conduct is intended to cause a physical, psychological, sexual, or economic impact once or repeatedly, the unacceptable conduct causes or may cause this effect, such conduct violates the dignity of a person or creates an intimidating, hostile, humiliating or offensive environment and/or physical, material and/or non-material damage has arisen or may arise.

Explanations of definitions:

Violence and harassment mean unacceptable conduct of one or more persons, which may manifest itself in various forms; it is the conduct where one or more managers or employees act with the purpose or effect of violating a person's dignity, having a negative impact on the employee's emotional health and/or creating a hostile work environment.

Violence is an act or omission by a person(s) causing an intentional physical, mental, sexual, or economic effect on another person(s) in connection with his/her job, as a result of which the employee suffers or may suffer non-material or material damage.

Physical violence could be understood as an act with the purpose of causing pain and/or injury. Physical violence may include (but is not limited to) beating, pushing, choking, hitting, shaking, pulling, smashing objects during an argument, throwing objects when angry, destroying property, injuring, or causing bodily harm.

Economic violence could be understood as an employee's humiliation due to economic dependence and/or suffered/being suffered economic damage caused by the coercion of the abuser. Such violence can manifest itself in (but is not limited to) the effect of dealing with the

employee financially, threats not to award incentives or stop paying them, devaluing the employee according to his/her merits and qualifications, suspending him/her from work, etc.

Sexual violence could be understood as an attack not only on a person's health and the inviolability of a person's body but also on social freedom, personal honour and dignity, i.e. at the same time, sexual violence has characteristics of physical and psychological violence. Such violence manifests itself in various forms, for example, jokes or making fun of another employee's sexuality or body, making offensive statements, insulting, calling names because of a person's sexual attitudes/conduct, etc.

Psychological violence is usually understood as insulting a person, making unfounded comments, threats, prohibitions, intimidation, humiliation, insults and other inappropriate conduct with the purpose of hurting, intimidating, disparaging or putting an employee in a helpless and powerless situation, forcing the person to feel dependence/performance a certain action/obey the abuser. For example, threats are used to suppress potential resistance from the victim.

Harassment means unwanted conduct related to the gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity, or religion of a person that occurs with the purpose or effect of violating the dignity of the person, and of creating an intimidating, hostile, humiliating or offensive environment.

Harassment can manifest itself verbally and in writing, less often through physical actions. Harassment can include insulting comments, jokes, humiliation, not sharing important information, excluding a person from other colleagues, meetings or consultations, being ignored, assigning tasks unrelated to work functions, etc.

The main difference between violence and harassment is that harassment is a continuous process, i.e. repeated unacceptable conduct, and violence is usually a one-time, sudden (acute) outbreak of inappropriate conduct.

Sexual harassment means any form of unwanted and insulting verbal, written or physical conduct of a sexual nature with a person, with the purpose of violating the dignity of the person, in particular, where an intimidating, hostile, humiliating or offensive environment is created.

In order to assess whether a situation qualifies as sexual harassment, it is worth paying attention to the main aspects listed below (*the list is not exhaustive*):

- Does the conduct degrade the dignity of a person (make a person feel uncomfortable, embarrassed)?
- Does the conduct create an intimidating, hostile, humiliating or offensive environment?
- Is the verbal, written or physical conduct unwanted or offensive?
- Is the verbal, written or physical conduct of an intimate nature?

Violence and harassment are prohibited (including, but not limited to):

- at work, including public and private places, when the employee is at the disposal of the employer or performs duties under the employment contract;
- during rest and meal breaks or when using household, sanitary, and hygiene facilities;
- during work-related outings, trips, training, events or social activities;
- during work-related communication, including communication through information and electronic communication technologies;
- in housing provided by the employer;
- on the way to or from work.

Linguistically, the word '**threat**' is understood as a threatening situation or danger, including various formidable events. This word is not yet considered unacceptable, but there is a real possibility that it will be (for example, verbal attacks by the employer, line manager, other employees or third parties, different conduct causing concerns).

When analysing a potential threat(s), which may be obvious or implicit, a key element is the consequences of the threat. These can be various forms of violence, punishments, disregard, isolation, harassment, oppression, bullying, etc.

The following are model threat situations (*the list is not exhaustive*):

- The practice applied by a company, institution, or organisation regarding the setting of work schedules without observing the terms laid down by the Labour Code is considered *a threat*, for example, not informing an employee in a timely manner about the changed work schedule, malicious manipulation of work schedules, the setting of which depends directly on the will of the line manager (all employees are the affected group).
- *Obvious threats* are, for example, persecution/stalking of an employee during work and/or after work hours or dissemination of a mocking video or e-mail via the internal network of a company, institution, or organization, where these threats may pose a real risk of harassment and/or violence to a specific employee.
- *An implicit threat* could be a situation where an unresolved conflict(s) can become the cause of inappropriate conduct at work, negatively affect the emotional working environment and productivity of work, and as a result, in the future, when emotional tension has increased significantly, a treat of real violence and/or harassment, as well as other situations that can increase an employee's vulnerability, can arise.

6. Most common forms of psychological violence at work (*the list is not exhaustive*):

- direct or indirect threats or accusations with the purpose of causing emotional or physical pain or loss (*for example, threats of dismissal, worsening working conditions, or when setting work schedules, etc.*);
- devaluation of achievements (*for example, unsubstantiated criticism of an employee for the tasks performed, with the purpose of humiliating, insulting him/her, etc.*);
- defamation (*for example, spreading untrue information that may damage a person's honour and dignity, etc.*);
- repeated negative comments (*for example, unpleasant comments of different content, etc.*);
- ignoring (*for example, isolation, exclusion from the team and joint activities, not sharing information, constant disregard, denial of an employee's requests and needs, etc.*);
- manipulation (*for example, cases where an inadequate workload is determined for an employee, manipulation of remuneration, introduction of requirements that cannot be achieved, etc.*);
- sarcasm (*for example, angry mockery, bitter irony, etc.*);
- a desire to mock (*for example, the conduct of an employee or a group of employees, where the personal and professional qualities of another person are exposed to collective ridicule, derisive comments about an employee or making associative jokes, creating a hostile and unethical environment in which the employee feels abused, humiliated, etc.*);
- screaming/shouting (*for example, communicating in a raised voice, uncontrolled emotions, etc.*);
- public humiliation (*for example, humiliating comments towards an employee, comments with the purpose of humiliating, belittling an employee, contempt, etc.*);
- insults with the purpose of undermining an employee's self-confidence, including public humiliation;
- using actions, statements or gestures that focus on an employee's self-esteem and self-respect with the purpose of humiliating.

Examples of expressions of unacceptable conduct are also presented below:

- unacceptable or unwanted physical contact (for example, physical touching, petting, slapping, groping, reaching out to touch (hug), pulling close to another person, etc.) or demanding such physical contact;
- displaying or sending information of obscene content;
- obsessive interest in private life and intimate relationships;
- unwanted comments about appearance, body shape or clothing;
- offensive jokes, bullying, gossip, rumours, slander, offensive gestures;
- intentional isolation of an employee in work activities;
- collecting and/or distributing information about an employee that is not related to the employee's functions;
- conduct aimed at restricting a person's freedom of self-determination;
- impact on an employee, in order to make the employee perform certain functions (services) not related to work.

7. **What is not considered psychological violence?** An essential feature distinguishing psychological violence from a conflict at work is the aspiration of the abuser to psychologically prevail over the victim of violence. The identification of psychological violence at work depends on the subjective perception of the environment by the employee or the manager, so there may be situations (*the list is not exhaustive*):

- where an employee may mistakenly recognise/identify psychological violence due to his/her education, acquired competencies or other circumstances, for example, an employee may not know the legal requirements that he/she must comply with, is not properly familiar with the internal (normative) legal acts of a company, institution or organisation, etc.;
- where the evaluation of employees' performance takes place, the weaknesses and advantages of the work performed by an employee can be named, comments can be made. The employer has the right to assess an employee's professional qualities and performance results, therefore it is necessary to understand the employer's reasonable assessment (work criticism) and evaluate whether in a specific case such criticism is expressed in a humiliating or mocking manner;
- the employer can check whether an employee complies with the duties assigned under the employment contract, and demand compliance with the requirements of local legislation (arriving at work on time, prohibiting leaving the workplace without the direct permission of the manager, etc.). The employer's strictness with an employee, in general, cannot be considered psychological violence, however, unreasonably increased strictness towards only one employee can be treated as psychological violence;
- misunderstandings/discussions/disagreements in views between the employer and an employee cannot in themselves be regarded as psychological violence.

8. **Employees' duties.** In order to ensure a safe working environment, each employee must (in addition to other duties specified in the Company's internal documents):

- in the relationship with colleagues, act in such a way as to ensure mutual respect and the dignity of each person;
- communicate politely and respectfully, ensuring with his/her conduct a working environment where no person experiences hostile, unethical, humiliating, aggressive, insulting, or offensive actions;
- refrain from any acts of harassment and violence towards colleagues;
- refrain from any actions that could create a humiliating or offensive work environment;
- immediately inform the Responsible Person about any observed cases of violence and harassment, take actions within his/her control to stop such conduct;

- having noticed unacceptable conduct, not tolerate it, not consider it a joke or lame banter, not encourage such conduct with an approving smile, laugh or other actions that support unacceptable conduct.

9. Procedure for submitting and examining reports of violence and harassment:

9.1. The examination of reports is based on the following basic principles:

- *immediacy* – all related persons (the victim, the alleged perpetrator, a witness(es)) are given all the opportunities to provide explanations for their actions;
- *expediency* – reports are examined and processed in the shortest possible time;
- *assistance to the victim* – psychologically safe working conditions are created upon receipt of a report of harassment and/or violence;
- *objectivity and impartiality* – an investigation is carried out objectively, without prejudices regarding the assessment of the circumstances;
- *presumption of innocence* – the alleged perpetrator is presumed innocent until a decision on a violation or his/her misconduct is made.

9.2. Procedure for submitting and examining reports:

- The responsibility for the examination of reports in the Company is vested in the Human Resources Manager (the **Responsible Person**).
- An employee who reasonably believes that he/she or another person is being exposed to harassment and/or violence can submit a report to the Responsible Person by delivering it directly or by e-mail, filling out [Annex No. 1](#) to the Policy.
- In all cases, a report can be addressed to the CEO of the Company directly. The report can also be submitted via the Company's trust line channel at pasitikejimolinija@akropolis.lt;
- An employee who has experienced violence and harassment by a company manager has the right to apply:
 - to the person who appointed the manager or the founder of the legal entity (in the case of a Company, to the Board (if the manager is also a member of the Board, other members of the Board shall be addressed) or the Company's shareholder) for an assessment of the manager's behaviour;
 - to the State Labor Inspectorate of the Republic of Lithuania under the Ministry of Social Security and Labor - for identification of the situation and application of impact measures;
 - to institutions investigating individual labour disputes or service disputes - for compensation for damage;
- In order for the Company to conduct a thorough investigation, we encourage you not to submit anonymous messages. During the investigation, the Responsible Person may apply for clarification of certain circumstances; in addition, in such a case, the Company may not be able to ensure safe conditions and/or take measures without knowing the identity of the reporting person.
- The report must indicate the following: what kind of unwanted conduct or its threat the employee has experienced; how that conduct has manifested itself; how often the employee is exposed to such conduct; which employees, when and under what circumstances, acted in this way; whether there are other employees who saw or know about it; whether there is other evidence confirming the stated circumstances.
- The factual circumstances indicated by the employee must be based on objective evidence (for example, correspondence).
- It is recommended to submit a report within the shortest possible time from the day the complained actions were committed or became apparent.

- The Responsible Person, upon receiving a report, immediately (but no later than within 2 (two) business days from the date of receipt of the report) assesses the nature of the report and having consulted with the Company's CEO, appoints a commission (the **Commission**) to investigate the report.
- The examination of a report is refused if the report is based on information that is clearly untrue or the person applies repeatedly for the same circumstances, where the previously submitted report was examined and a decision was made on it. The Responsible Person informs the reporting person about the refusal to examine the report.
- The Commission is formed according to the following principle: The Commission in all cases consists of 3 (three) members; the chairperson of the Commission is the Responsible Person (unless another person is appointed by the decision of the Company's CEO, taking into account the specific situation); it is recommended to include one in-house lawyer in the Commission; other members of the Commission is selected subject to the nature of the report, taking into account the necessary competences. The member of the Commission does not necessarily have to be an employee of the Company, for example, a psychologist can be invited. In the event that the Responsible Person and/or the Company's CEO believes that a larger number of Commission members is needed to investigate a specific report, a larger Commission may be formed. In all cases, the Commission shall be composed of an odd number of members to avoid situations where votes are tied.
- Any investigation conducted by the Commission (including ongoing meetings) must be put down in the form of minutes; the Responsible Person oversees the preparation of the minutes.
- Any report must be examined as soon as possible, but, in any case, no later than within 1 (one) month from its receipt.
- When investigating reports, the **confidentiality** of the reporting person must be ensured in all cases. The members of the Commission are prohibited from disclosing any information related to the investigation to persons not participating in the investigation procedure. Before starting work, the members of the Commission shall sign a confidentiality undertaking to protect and not disclose information that has become known to them in connection with the case under consideration. Also, any persons who have obtained information about the report or its investigation must ensure the confidentiality of the reporting person and the content of the report.
- The reporting person may not be subject to any adverse impact measures/sanctions, including those related to employment at the Company.
- Reports must be made in good faith. In the event it is determined that a person has provided false information knowingly and/or with the intention of harming another person, appropriate measures may be taken against such a person. The Company implements the 'zero tolerance' policy against providing false information.
- After conducting the investigation, the Commission adopts a conclusion. The head of the company, having assessed the Commission's conclusion, makes a decision to approve or disapprove the conclusion. The responsible person shall, no later than within 3 (three) working days from the adoption of such a decision, submit this decision and the Commission's conclusion (or an extract thereof, ensuring the protection of personal data) in writing to the employee who reported the violence and harassment experienced, and to the employee whose behavior was the subject of the investigation;
- An employee who disagrees with the Company's decision has the right to appeal it in accordance with the procedure established for the consideration of individual or service disputes;

- The head of the company (or his authorized person), having approved the Commission's conclusion recognizing the existence of violence and harassment at work: (i) decides on the issue of applying disciplinary measures to the employee who has used violence and harassment; (ii) organizes a seminar, discussion or training for employees on a topic relevant to the specific case or applies other available measures to reduce the escalation of the incident and its possible consequences;
- The head of the company (or his authorized person), having approved the Commission's conclusion, which does not recognize the existence of the fact of violence and harassment at work, in accordance with the principle of proportionality, additionally reminds (for example, sends e-mails, organizes a seminar, discussion, training) employees about the signs, manifestations, standards of respectful behavior and other relevant issues of violence and harassment at work.

9.3. **Actions/measures that may be taken following an investigation.** The Company notes that each case is individual and, in each case, the Company will take the necessary measures for the specific case to ensure a safe working environment and provide assistance to the employee who has experienced violence. Such actions/measures can be (*a model list*):

- the Company points out that, according to the Labour Code, violence or harassment, including psychological violence or gender-based harassment, is considered a gross violation of discipline at work (where it is objectively proven, explanations have been taken into account, etc.), which may result in the termination of the employment contract on the employer's initiative due to the fault of the employee;
- employees who have experienced violence and harassment have been provided with the opportunity to receive legal and emotional support, as well as to use the services of all necessary specialists (psychologists, psychiatrists, etc.); the services of those specialists have been paid for (in accordance with the principle of reasonableness);
- granting of leave;
- written warning to the perpetrator;
- conversation with the perpetrator;
- training for employees in order to educate, raise company culture, develop skills to solve conflict situations, etc.

10. Trainings

10.1. The responsible person shall periodically, at least once every three calendar years, and as needed, organize training for employees on the risks of violence and harassment, preventive measures, and employees' rights and obligations in the field of violence and harassment. The training must be designed to help employees identify, understand and effectively respond to cases of violence and harassment and must include topics related to the forms of violence and harassment at work, their consequences, appropriate (ethical) communication, methods of protecting violated rights, case analysis and discussions that help employees acquire the necessary knowledge of appropriate communication and behavior in the workplace.

10.2. Training is mandatory for all employees. If an employee is unable to participate in training due to objective reasons, he/she must be provided with the opportunity to familiarize himself/herself with the training materials within five working days from the date of termination of such objective reasons. Newly hired employees must be provided with the opportunity to familiarize themselves with the training materials no later than one month from the date of employment.

10.3. The fact of training is recorded in the Company's internal documents.

11. Persons overseeing the Policy, amendment of the Policy and other related issues:

- 11.1. The Responsible Person is responsible for the implementation of the Policy. The Policy applies from the date specified in the order of the Company's CEO on the adoption of the Policy. The Responsible Person must initiate an update of the Policy if additional risk factors emerge, new forms of violence and/or harassment are identified, new duties for employees are established, applicable legal acts change, etc. In any case, the Responsible Person must review the Policy at least once per calendar year.
 - 11.2. In the event that any provision of the Policy conflicts with legal acts, valid and applicable legal acts apply.
 - 11.3. If you decide to apply to the Company in the cases specified in this Policy, the Company will process your personal data for the purpose of examining a submitted report. You provide your data to the Company on the basis of consent, which is expressed by your active actions, i.e. by your application to the Company.
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Confidentiality ensured

REPORT ON VIOLENCE/HARASSMENT AT WORK	
Data of the reporting person	
Name, surname	
Job title	
Contact details of the reporting person	
Telephone number	
E-mail address	
Data of the alleged perpetrator	
Name, surname	
Job title	
Relationship with the reporting person (<i>colleague, line manager, head of the company, etc.</i>)	
Description of the event (date, time, place and circumstances)	
Facts	Implications
Evidence (e.g., e-mails from the suspect [alleged perpetrator], text messages, etc.)	
Witnesses	
Name, surname and contact details	
Proposals of the reporting person	
A proposal for a solution to the conflict/current situation	

Date: _____

Signature: _____