

 LIETUVOS GELEŽINKELIAI	JSC Lietuvos geležinkeliai People and Culture
<i>Guidelines for the Prevention of Violence and Harassment and Ensuring Equal Opportunities</i>	Version 01

APPROVED
by Decision No. SPR-L2(KOPR)-177/2024
of the Director of People and Culture of
JSC Lietuvos geležinkeliai dated 6 December 2024

**GUIDELINES
FOR THE PREVENTION OF VIOLENCE AND HARASSMENT AND ENSURING EQUAL
OPPORTUNITIES IN JSC LIETUVOS GELEŽINKELIAI CORPORATE GROUP**

1. Objective and Scope of Application

- 1.1. The objectives of the Guidelines for the Prevention of Violence and Harassment and Ensuring Equal Opportunities in JSC Lietuvos geležinkeliai Corporate Group (hereinafter – the Guidelines):
 - 1.1.1. Ensure that the provisions of international human and civil rights documents and the laws of the Republic of Lithuania, which establish the equality of persons and the prohibition of restricting human rights and granting privileges to them based on identity features are implemented within the LTG Corporate Group, and prohibit any discrimination;
 - 1.1.2. Ensure a healthy and safe working environment for employees, encourage employees to contribute to the prevention of violence and harassment, and develop a respectful work culture.
- 1.2. The Guidelines define the most important Guidelines for ensuring, fostering and supervising the implementation of equal opportunities and the prevention of violence and harassment applied in the LTG Corporate Group, as well as the measures for implementing these Guidelines.
- 1.3. The Guidelines are prepared in accordance with European Union and national legislation.
- 1.4. Internal documents of the LTG Corporate Group related to the prevention of violence and harassment and ensuring equal opportunities must not contradict these Guidelines and, if necessary, must be updated in accordance with these Guidelines.
- 1.5. The Guidelines apply to all employees of the LTG Corporate Group, including trainees and persons performing internships or providing services in other legal forms within the LTG Corporate Group. The business partners of LTG Corporate Group are also encouraged to comply with the Guidelines.

2. Definitions

- 2.1. The following terms and abbreviations are used in these Guidelines.
- 2.2. Other terms used in the Guidelines must be understood as they are defined in the Labour Code of the Republic of Lithuania, the Law on Equal Opportunities of the Republic of Lithuania, the Law on Equal Opportunities for Men and Women of the Republic of Lithuania, other laws regulating the protection of equal opportunities, the LTG Principles of Labour and other internal legal acts of the LTG Corporate Group.

Term/Abbreviation	Definition/Explanation
Principles of Work in LTG	Principles of Work in JSC Lietuvos geležinkeliai Corporate Group. This is an internal document defining the norms of conduct and work procedure requirements applicable to all employees of the LTG Corporate Group.
Employee	An employee of an LTG group company with whom an employment contract has been concluded.
Discrimination	Direct and indirect discrimination, harassment, instruction to discriminate on the basis of gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or opinions, age, sexual orientation, disability, ethnicity, religion.
LTG	JSC Lietuvos geležinkeliai.
LTG Group Company	A company belonging to the JSC Lietuvos geležinkeliai Group, including JSC Lietuvos geležinkeliai.
LTG Corporate Group	A Corporate Group consisting of JSC Lietuvos geležinkeliai and its directly and indirectly controlled legal entities.

Term/Abbreviation	Definition/Explanation
Guidelines	Guidelines for Ensuring Equal Opportunities and the Prevention of Violence and Harassment.
Candidate	A natural person (citizen of the Republic of Lithuania and non-citizen of the Republic of Lithuania) seeking to hold the designated position in LTG Corporate Group. A candidate is also an employee of LTG Corporate Group who seeks to hold the designated position in LTG Corporate Group through an internal career path.
Competence	The ability of an employee to perform a certain activity based on the totality of acquired knowledge, skills, abilities, and values.
Equal Opportunities	Implementation of human rights enshrined in international human and civil rights documents and the laws of the Republic of Lithuania, regardless of gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or opinions, age, sexual orientation, disability, ethnicity, religion.
Violation of Equal Opportunities	Failure to comply with or improper compliance with the principles of implementation and fostering equal opportunities set out in these Guidelines and failure to perform or improper performance of obligations related to the implementation of these principles.
Mobbing	A form of psychological violence at work, manifested as any offensive, insulting or other type of repeated (in rare cases – of a one-time nature) unacceptable behavior directed against an individual employee, which violates his/her professional, social and/or psychological well-being, causes a negative impact on the employee's mental and/or physical health, reputation, and reduces productivity.
Indirect discrimination	An action or inaction, a legal norm or an apparently neutral condition or practice which is formally the same but which, when implemented or applied, results in or is likely to result in a de facto restriction on the exercise of rights or the granting of privileges, preference or advantage on the basis of identity characteristics, unless that act or inaction, legal norm or an assessment criterion, condition or practice is justified by a legitimate aim and that aim is achieved by appropriate and necessary means.
Whistleblowing Policy	Unified whistleblowing channel management model, principles and responsibilities operating within the LTG Corporate Group.
Harassment	Undesirable behavior that aims to offend or violates the dignity of a person on the basis of gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or opinions, age, sexual orientation, disability, ethnicity, religion and aims to create or creates an intimidating, hostile, degrading or offensive environment.
Psychosocial Risks	Risks to employees' mental and physical health and social well-being posed by psychosocial factors related to employment relationships.
Psychosocial Risk Factor	A factor that causes mental stress to an employee due to working conditions, work requirements, work organization, work content, relationships between employees or between a manager and an employee.

Term/Abbreviation	Definition/Explanation
Sexual Harassment	Undesirable behavior of a sexual nature towards a person, whether verbal, written or physical, where such conduct has the purpose or effect of violating the dignity of the person, in particular by creating an intimidating, hostile, degrading or offensive environment.
Violence	The act or inaction of an employee(s) to intentionally inflict physical, mental, sexual, or economic harm on another employee(s) related to work, resulting in or likely to result in non-material or material harm to the employee(s).
Stress	Employee's reaction to adverse psychosocial factors of working conditions, work requirements, work organization, work content, employee relations and/or relations with the employer and/or third parties.
Social Status	The situation of a person, which is determined by his/her family situation, acquired education, qualification or training and studies at scientific and educational institutions, property owned, income received, need for state support established in legal acts and/or other factors related to the person's financial situation.
Identity Features/Prohibited Grounds of Discrimination	Gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity, health status, marital and family status, membership in a political party, trade union or association, religion, intention to have a child, the employee's exercise of rights provided for in legal acts, circumstances not related to the employee's professional characteristics, or other things not related to the employee's professional characteristics.
Direct discrimination	Treatment of an employee where, on the basis of gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or opinions, age, sexual orientation, disability, ethnicity, religion, less favourable conditions are applied to him/her than are, were or would be applied to another person in similar circumstances, except for exceptions provided for by law.

3. Key principles of the guidelines

- 3.1. Direct or Indirect Discrimination, intent or instruction to discriminate, Harassment, Sexual Harassment, Harassment, as well as any insults, Violence, Mobbing, bullying, abuse of position or similar unfavorable behavior are prohibited and not tolerated in the LTG Corporate Group. Discriminatory actions or violations of honor and dignity towards other employees or third parties (e.g. customers, suppliers, business partners, etc.) during work or at the workplace are considered a gross violation of work duties.
- 3.2. In the companies of the Group, decisions related to employment relations are made taking into account the functions performed by employees, their competencies, performance results, professional and business qualities of employees, the values of the LTG Corporate Group, business needs and other objective criteria, but not the employee's identity traits that are not related to the work performed.
- 3.3. The LTG Corporate Group is creating a culture based on values, sustainability, Competence and results, in which the implementation and fostering of equal opportunities for employees, prevention of violence and harassment is an integral part of the life of the LTG Corporate Group.

- 3.4. The companies of the Group respect and protect the rights of each Candidate and employee, including the rights to private life and protection of personal data, respect the family obligations of employees, promote the personal and professional development of employees, promote a safety culture based on cooperation, ensure a safe and healthy work environment that meets the needs of employees, act respectfully and fairly when selecting and employing Candidates and at all stages of employees' work, aiming to ensure that no employee experiences any form of discrimination based on personal identity features.
- 3.5. LTG creates a respectful and open work environment where everyone can feel 100% themselves. It also strives for balance in the least represented employee groups in the organization.
- 3.6. The LTG Corporate Group does not consider the following special measures established by law to be unlawful discrimination, which aim to create and apply conditions and opportunities that guarantee and promote integration into the working environment, as well as special temporary measures that are applied to ensure equality and prevent violations of equal opportunities (positive discrimination):
 - 3.6.1. Age restrictions where it is justified by a legitimate aim and achieved by appropriate and necessary means;
 - 3.6.2. Requirement to know the state language;
 - 3.6.3. Prohibition of participation in political activities;
 - 3.6.4. Different rights apply due to citizenship;
 - 3.6.5. Special measures in the field of health protection, occupational safety, employment, and the labor market, in order to create and apply conditions and opportunities that guarantee and promote integration into the working environment;
 - 3.6.6. Special temporary measures applied to ensure equality and prevent violations of equal opportunities on the grounds of sex, race, nationality, citizenship, language, origin, social status, faith, beliefs or opinions, age, sexual orientation, disability, ethnic origin, religion;
 - 3.6.7. When, due to the nature of specific types of professional activities or the conditions in which they are carried out, a certain human characteristic constitutes an essential and determining occupational requirement, and this objective is legitimate and the requirement is proportionate;
 - 3.6.8. When the legal regulation of restrictions, special requirements or certain conditions due to a person's social situation is justified by a legitimate aim and this aim is pursued by appropriate and necessary means;
 - 3.6.9. The provision of additional benefits on the basis of age, disability and social situation, where this is justified by a legitimate aim and this aim is pursued by appropriate and necessary means.

4. Possible Forms of Discrimination, Violence and Harassment and Ways to Recognize Them

- 4. LTG Corporate Group does not tolerate any unacceptable behavior that is intended to harm/harms/may harm an employee's emotional, mental and/or physical health, or seeks to create/creates a hostile work environment. Such unacceptable behavior may take the form of: Discrimination, Violence and Harassment.
 - 4.1. Discrimination may occur due to an Employee's gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity, religion.
 - 4.2. Discrimination, Violence and Harassment can manifest itself in the form of: psychological pressure (including Mobbing), unethical, disrespectful behavior towards other employees, ignoring, bullying, unfounded remarks and criticism, shouting, insults, slander, manipulation, ridicule, bullying, underestimation of achievements, unethical comments, threats, intimidation, physical and/or sexual harassment (exploitation), other unacceptable behavior.
 - 4.3. Violence and Harassment can manifest themselves in: offensive and/or degrading comments, jokes; belittling or showing contempt for an employee; not sharing important information; isolating the individual from other colleagues, meetings or conferences; ignoring them; assigning tasks unrelated to work functions; unfounded criticism of completed tasks, humiliating/intending to offend them, etc.
 - 4.4. Violence and/or Harassment can also be considered any unwanted physical contact (for

example, physical touching, stroking, slapping, pinching, seeking to touch (hug), move closer to another person, etc.) or a demand for such physical contact; displaying or sending information of indecent content; intrusive interest in private life, intimate relationships; unwanted comments about appearance, body shape, clothing; gossip, rumors, offensive gestures; collection and/or dissemination of information unrelated to the employee's functions; behavior aimed at limiting a person's freedom of decision-making.

5. Scope of Implementation of the Guidelines

- 5.1. In order to ensure the implementation of the Guidelines, the LTG Corporate Group periodically shares information with employees, organizes training and consultations for managers and employees, thus promoting the awareness and knowledge of managers and employees about ensuring equal opportunities and the prevention of violence and harassment.
- 5.2. **The LTG Corporate Group adheres to the Guidelines in all areas related to employment relations:**
 - 5.2.1. In work, public or other private places, when the employee is at the employer's disposal and/or performs duties under an employment contract;
 - 5.2.2. During breaks for rest and meals or when using household, sanitary, hygiene (for example, changing rooms, showers, clothing and footwear storage rooms, relaxation areas) or other common employee facilities;
 - 5.2.3. Meetings (including those held remotely), as well as work-related outings, trips, trainings, seminars, events or other social activities;
 - 5.2.4. During communication via information and electronic communication technologies (e-mail, Teams channel, etc.)
 - 5.2.5. In other situations which are related to employment relations.
- 5.3. **Ensuring equal opportunities in hiring and firing:**
 - 5.3.1. All Candidates are subject to the same selection criteria and equal and non-discriminatory employment conditions, except where, due to the nature of the specific professional activity or the conditions in which it is carried out, a certain characteristic of human identity constitutes a genuine and determining occupational requirement, and this objective is legitimate and the requirement is proportionate.
 - 5.3.2. Job advertisements shall state requirements relating to the competencies required to perform a specific job function, based on objective and neutral professional criteria, including necessary professional qualities, skills or other requirements. Vacancy advertisements shall not contain requirements that directly or implicitly give preference to individuals on the basis of a certain identity feature.
 - 5.3.3. During the Candidate selection and/or job interview, all requirements and/or questions relate only to the employee's suitability to perform the job function, his/her competence, professionalism, experience, professional and subject-matter qualifications and other similar objective criteria related to the requirements for the specific position for which the person is applying. It is prohibited to request information from a Candidate or employee related to his/her family status or family plans, health status, except in cases where health requirements are directly related to the performance of job functions, or other circumstances unrelated to the direct performance of the job function.
 - 5.3.4. Uniform and objective grounds and criteria for dismissal are applied, which are related only to the employee's competence, performance of job duties and other circumstances provided for by law.
- 5.4. **Ensuring equal opportunities during employment relationships:**
 - 5.4.1. All employees are provided with a healthy and safe working environment, equal working conditions for performing work functions and provided with the necessary tools to perform the work (to the extent possible, taking into account the specifics of the work performed by the employee).

- 5.4.2. LTG Group companies take measures to ensure that employees do not experience harassment, sexual harassment, or instructions to discriminate in the workplace, and are not persecuted and are protected from hostile behavior or negative consequences if they file a complaint about discrimination or participate in a case about discrimination.
- 5.4.3. When determining the requirements for work clothing, the functions performed by employees and the needs arising from their identities are taken into account.
- 5.4.4. When coordinating the working time regime, determining the duration and schedule of working time, making decisions on leave and other options related to the working regime, the needs of the individual employee are taken into account, to the extent possible, taking into account the specifics of the work performed by the employee.
- 5.4.5. All employees are provided with equal opportunities to improve their competencies, pursue professional development, and gain practical work experience.
- 5.4.6. An employee's career in the LTG Corporate Group depends solely on the employee's competence, experience and knowledge, achieved work results, and quality of work.
- 5.4.7. Annual or other period-specific performance evaluation of employees is carried out for all employees by applying the same type of procedures and objective evaluation criteria directly related to job functions, which may differ only due to the specifics of the functions performed by certain positions or special requirements for a particular position.
- 5.5. Ensuring equal opportunities in determining wages:**
 - 5.5.1. The remuneration of employees is determined in accordance with the remuneration policy, implemented through the remuneration determination methodology. The specific amount of the employee's remuneration is determined in accordance with criteria related to the work functions performed by the employee, the degree of responsibility assigned to the employee, competence, performance results and other objective criteria. All employees are familiarized with the remuneration policy, and it is also publicly announced: <https://ltg.lt/en/about-us/corporate-governance/remuneration/>.
 - 5.5.2. Employees are paid wages determined according to uniform principles for the same or equivalent work. The same work means the performance of a certain work activity which, according to objective criteria, is the same or similar to another work activity to the extent that employees can be interchanged for it without greater costs to the employer. Equivalent work means work which, according to objective criteria, requires no less qualification and which is no less significant for the employer in achieving its business objectives than other comparable work. Salary determined according to uniform principles means salary determination within the salary ranges established for the respective position, after assessing the criteria specified in Clause 4.5.1.
 - 5.5.3. Additional earnings in cash or in kind, which employees directly or indirectly receive from the employer for their work (additional benefits and all other employee incentives), are allocated based on clear criteria known to employees. If the procedure for paying certain benefits or motivation measures is not discussed or approved within the LTG Corporate Group, when making such payments or applying motivation measures, the LTG Corporate Group shall be guided by the general principles of equal opportunities, fairness and reasonableness.

6. Measures to Ensure Equal Opportunities, Prevent Violence and Harassment

- 6.1. The following Equal Opportunities, Violence and Harassment Prevention measures are applied in the LTG Corporate Group:
 - 6.1.1. Primary prevention:**
 - 6.1.1.1. Improving the psychosocial and physical working environment, ensuring that work-related decisions are based on the principles of justice, fairness, equal opportunities and respect for people, that when organizing work, the workload is optimized, work is distributed evenly (taking into account the working time norm), good relations between employees are taken into account, emerging problems are effectively resolved and ongoing Stress situations are avoided. In order to manage Psychosocial risk factors, a Psychosocial risk assessment is organized, performed and updated if necessary/measures are planned to eliminate or reduce the risk;

- 6.1.1.2. Fostering organizational values and developing organizational culture, involving employees, providing feedback, creating flexible working conditions (taking into account the specifics of the activity and possibilities);
- 6.1.1.3. Communication between colleagues, employees and the manager based on respect, attentiveness and openness, manager's support for employees in solving problems that arise;
- 6.1.1.4. Clear principles of LTG Labor, which apply to employees of the LTG Corporate Group and members of collegial management bodies, interns and trainees.
- 6.1.1.5. Ensuring compliance with the principles of personal data processing and fostering a culture of personal data protection, in order to avoid cases of unlawful use (processing) of personal data, especially those revealing the characteristics of the Identity, which may cause a potential risk of Discrimination.

6.1.2. Secondary prevention:

- 6.1.2.1. Employees are trained on how to recognize, identify and respond to potential cases of Discrimination, Violence and Harassment, how to avoid or reduce these threats (for example, employees experiencing Stress or other conflict situations in the work environment are encouraged to talk about it with their immediate supervisor and seek common solutions that will help create working conditions that are favorable to emotional and mental health). Seminars, trainings and presentations on the topics of Equal Opportunities and Violence and Harassment are organized, information is shared during meetings and through other internal communication channels;
- 6.1.2.2. All employees working in the LTG Corporate Group or newly hired employees are introduced to the Guidelines, LTG Labor Principles and other local legal acts valid in the Group company. Employees are aware of work requirements, norms of behavior (work ethics);
- 6.1.2.3. Employees are encouraged not to tolerate unacceptable behavior from colleagues, managers or other persons and to report any Violence and/or Harassment and/or Violation of Equal Opportunities that may have been/is being applied to them or other persons and to the persons who have committed/are committing these actions.

6.1.3. Tertiary prevention:

- 6.1.3.1. Record and take active actions to investigate/control/eliminate all cases of violation of Equal Opportunities, Violence and Harassment. Analyze and identify possible violation of Equal Opportunities, causes of Violence and Harassment, persons who committed acts of Violence and/or Harassment, specific structural (functional) units of the company of the Group in which unacceptable employee behavior occurred. Taking this into account, provide effective and appropriate measures to protect employees from threats of undesirable behavior;
- 6.1.3.2. Upon detection of a case of violation of Equal Opportunities, Violence or Harassment, immediately take measures to provide the necessary assistance to the employee who has experienced the violation of Equal Opportunities, Violence and/or Harassment;
- 6.1.3.3. Violation of Equal Opportunities, Violence and/or Harassment, as well as the submission of a knowingly false report about a possible case of Violence and/or Harassment, with the aim of harming another employee, are considered serious violations of work duties, due to which the employee who committed the violation of Equal Opportunities, Violence and/or Harassment or the employee who submitted a knowingly false report about a possible case of violation of Equal Opportunities, Violence and/or Harassment, may be dismissed from work in accordance with the procedure established by the Labour Code of the Republic of Lithuania.

7. Whistleblowing and Investigation Procedures for Reporting Violations of Equal Opportunities, Violence or Harassment

- 7.1. All reports of violations of equal opportunities, violence and harassment are handled in accordance with the Whistleblowing Policy approved by the LTG Corporate Group, which establishes a unified procedure for submitting and investigating reports of violations within the LTG Corporate Group.
- 7.2. The purpose of the Whistleblowing Policy is to develop a system for reporting potential violations that would help foster a culture of integrity within the LTG Corporate Group and increase public trust in the LTG Corporate Group by creating an accessible system of

reporting channels, encouraging all employees and the public to report potential violations in a timely manner, maintaining the confidentiality of the Whistleblower and ensuring the prohibition of retaliatory actions against the Whistleblower.

- 7.3. All Employees shall be familiarized with the Whistleblowing Policy. The Policy is also publicly posted on the LTG Group website: <https://ltg.lt/en/protection-of-whistleblowers/>.
- 7.4. All reports received regarding possible violations of Equal Opportunities, Violence or Harassment shall be investigated. An employee who violates the provisions of the Guidelines may be dismissed from work in accordance with the procedure established by the Labour Code of the Republic of Lithuania.
- 7.5. An Employee may also submit a report on a violation of equal opportunities to the Office of the Controller of Equal Opportunities or another competent institution. LTG Corporate Group undertakes to cooperate with the investigating institution.

8. Supervision and Control of Guidelines

- 8.1. The Guidelines and their amendments are approved by the CEO's decision, after completing the information and consultation procedure with the works council or trade unions performing the functions of the works council.
 - 8.2. The Head of Organizational Development, Diversity and Inclusion of the LTG Corporate Group is responsible for initiating and coordinating the review and update of these Guidelines.
 - 8.3. The Guidelines are reviewed at least once a year, in the event of significant changes to the long-term strategy of the LTG Corporate Group, changes in the organizational management structure of the LTG Corporate Group, changes in operational functions, changes in legal acts of the European Union or the Republic of Lithuania, or due to other circumstances.
 - 8.4. The implementation of the Guidelines in each company of the Group is the responsibility of the managers of the Group's companies and heads of structural units, who, by their behavior and attitudes, ensure that activities in the areas of activity assigned to their responsibility are carried out in accordance with the provisions of the Guidelines. Employees have the right to submit proposals for the improvement of the provisions of the Guidelines.
 - 8.5. The Guidelines apply to the extent that they do not conflict with the laws of the Republic of Lithuania and/or other valid legal acts.
 - 8.6. The Guidelines are made public.
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