



JOINT-STOCK COMPANY “VIRŠI-A” SUPPLIER CODE OF CONDUCT

2025



General Provisions

AS VIRŠI-A, SIA VIRŠI Renergy and SIA VIRŠI Loģistika are committed to ensuring sustainability in all areas of business and strive to apply the highest ethical standards.

This Supplier Code of Conduct (hereinafter – Code) sets out the ethical principles and requirements that AS VIRŠI-A, SIA VIRŠI Renergy and SIA VIRŠI Loģistika (hereinafter – VIRŠI) expect from their suppliers and service providers to ensure sustainable, fair and responsible cooperation. The Code is based on corporate responsibility standards and business ethics. VIRŠI is committed to acting responsibly and ethically and expects the same from its partners.

The Code applies to all VIRŠI suppliers, service providers and their partners (hereinafter – suppliers). Suppliers must ensure that suppliers in their supply chain also comply with the principles of this Code.

VIRŠI has the right to verify compliance with this Code and the principles through audits or surveys. If the suppliers do not comply with the requirements set out in this document, VIRŠI may require the suppliers to take immediate corrective measures. In the event of a serious breach, VIRŠI reserves the right to unilaterally terminate the cooperation and contract with the supplier.





Ethics

Suppliers must operate honestly and responsibly in accordance with the following basic ethical principles.

Fair Competition.

Suppliers must conduct their business in accordance with the principles of fair competition and comply with the laws and regulations governing competition.

Animal Welfare.

Suppliers must ensure that animal products are produced responsibly and ethically, respecting the natural needs of each species. This means that animals must be kept in healthy and suitable conditions, with preventive veterinary care.

Protection and Privacy of Information and Data.

Suppliers must protect confidential information. The Supplier must protect the privacy rights of employees and the protection, security and lawful use of personal data.

Prevention of Conflicts of Interest.

Suppliers must be able to recognise, avoid and manage situations where conflicts of interest may arise between the supplier and VIRŠI. If such a conflict already exists or is likely to arise, VIRŠI must be informed immediately.





Human Rights and Working Conditions

Suppliers must ensure respect for the human rights of employees, as set out in the UN Universal Declaration of Human Rights, and treat employees with respect. Suppliers must adhere to the following principles:

Voluntary Employment.

Employees must work voluntarily – suppliers must not use forced labour, prison labour or be involved in human trafficking. Employees must be free to accept or refuse a job offer. Employees must not be forced to pay to get a job and must not be denied freedom of movement.

Children and Youth Employment.

Suppliers are prohibited from employing children. Suppliers may employ young people under the age of 18, but only in work that is not harmful to their health, safety or psychological development, and only if they are over the minimum working age or the age of compulsory school leaving set by the State.

Equality and Inclusion.

Suppliers must provide equal opportunities and a work environment free from discrimination, regardless of race, colour, age, gender, sexual orientation, ethnic origin, disability, religion, political beliefs, trade union membership or marital status.

Respectful Treatment at Work.

The workplace must be a respectful and safe environment. All forms of violence and abusive behaviour – including sexual or physical violence, punishment, threats or psychological abuse – must be excluded.

Fair Pay and Working Conditions.

Suppliers must pay workers wages in accordance with the minimum wage standards set by law and employment contracts that include overtime and compulsory social benefits. Remuneration should reflect the skills, performance and experience of the employee, taking local labour market conditions into account. Overtime may only be voluntary and must comply with legal and regulatory requirements.

Right to Association and Collective Agreement.

Open communication and direct dialogue with employees to address working conditions and remuneration should be encouraged. Suppliers should respect the right of workers to freely join or not join trade unions and to conclude collective agreements. The Supplier must not interfere with or obstruct the formation of trade unions or collective bargaining. Employee representatives are not discriminated against and are given the opportunity to exercise their rights. Employees must be able to communicate freely with management about working conditions without fear of sanctions.





Health and Safety

Suppliers have a duty to provide a safe, healthy working environment for workers and to support their physical and mental well-being. The key health and safety principles are:

Safe Working Environment.

To guarantee the safety of the working environment, suppliers must perform appropriate risk assessments and draw up emergency plans. Suppliers must provide appropriate equipment, facilities and services that support the safety, health and general well-being of employees. Suppliers should set an example by having a well-organised working environment and promoting a safety culture.

Emergency Preparedness.

Suppliers must be able to identify and assess potential emergencies in all areas of activity and mitigate their potential consequences. This includes providing the necessary equipment and materials, developing emergency plans and providing regular training.





Environment

Suppliers should work in an environmentally responsible and resource-efficient way to minimise negative environmental impacts and help their suppliers to do the same. The key principles in this area are:

Compliance with Environmental Legislation.

Suppliers must comply with all applicable local, national and international environmental laws and regulations in the countries where they operate. Obtain all necessary environmental permits, licences, information registrations, chemical registrations, etc., and ensure compliance and reporting.

Waste and Emissions Management.

Any waste, sewage or emissions that could harm human health or the environment must be managed, monitored and cleaned up before being released into the environment. This includes controlling the release of chemicals or pharmaceuticals into the environment.

Climate Change.

Suppliers should, where possible, assess and disclose their greenhouse gas emissions (Scope 1, 2 and 3) and set reduction targets. Suppliers must disclose information on the climate impact of products and services at the request of VIRŠI. Suppliers should move towards meeting their own climate mitigation targets and promote a similar approach among their suppliers.

Resource Efficiency.

Suppliers should aim for a circular economy by developing solutions that reduce waste and promote the more efficient use of resources (including water), giving preference to renewable and sustainable sources. Reuse and recycling measures should also be taken.

Hazardous Substance Management.

Suppliers should help VIRŠI to reduce the impact of chemicals on the environment and people by avoiding the use of banned materials. Suppliers must provide accurate information on products and their composition.

Economic Sustainability.

Suppliers are encouraged to play an active role in the social and economic development of the communities in which they operate by promoting sustainable and socially beneficial business practices.





Governance

Suppliers should use effective management systems that help ensure compliance with the Code and promote process improvement. The key principles in this area are:

Responsible Culture and Management Engagement.

Suppliers must demonstrate their commitment to the principles set out in this document by ensuring that they are adequately resourced and by identifying responsible employees at the senior management level.

Legislative Compliance.

Suppliers must ensure that all applicable laws, regulations, industry standards and best business practices are identified and followed in the transaction management process.

Corruption and Bribery Prevention.

VIRŠI does not tolerate any corrupt behaviour, including bribery in both public and private sectors (commercial bribery), whether active or passive. Extortion, fraud, embezzlement, theft or the granting or acceptance of any undue advantage is also unacceptable. Such advantages may take the form of undue discounts, undue payments or gifts. Suppliers should have effective systems in place to help prevent such behaviour and ensure compliance with the laws and regulations.

Fair Tax Payment.

The Supplier is obliged to comply in full and on time with all applicable tax obligations in accordance with applicable laws and regulations. Payment of taxes must reflect genuine economic activity, with no tax avoidance or aggressive tax planning practices.

International Sanctions Compliance.

The Supplier is obliged to comply with all the applicable international and national sanctions regimes, including but not limited to sanctions imposed by the United Nations, the European Union and other jurisdictions (if applicable under the laws and regulations binding on the Supplier). The Supplier undertakes not to deal with persons, organisations or entities subject to sanctions and to conduct appropriate checks to prevent the risk of a possible breach of sanctions.

Risk Management.

Suppliers must develop systems to help identify and control potential risks in a timely manner in all areas covered by this Code. These systems should be regularly evaluated and improved. Suppliers must establish risk management systems that identify, assess and mitigate risks in all areas exposed to risks.

Transparency and Traceability.

Suppliers must be able to review and trace the stages of their supply chain, from raw material sources to deliveries. If necessary, they should be able to provide VIRŠI with detailed information on these deliveries. Suppliers should be able to clearly and transparently indicate both the composition and



the origin of their products, including information on the packaging in which the products are packed. Declarations of the composition of the goods must be clear and provide information on the country of origin and production. Packaging materials must be labelled, indicating the nature of the material and the type of processing.

Staff Training and Competence.

Suppliers must implement a training programme to ensure that managers and employees have the appropriate knowledge, skills and abilities to meet the requirements set out in this document.

Detection and Reporting of Deficiencies.

Arrangements must be in place so that anyone, inside or outside the company, can safely report possible breaches without fear of sanctions. Such reports should be carefully considered and, where necessary, appropriate corrective action should be taken.

The Supplier acknowledges that it has read this Code of Conduct and undertakes to comply with it.

