CODE OF ETHICS AND CONDUCT
UAB GLASSBEL BALTIC

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1. Message from the Management

GLASSBEL, we work in a fast-changing, ambitious environment – where innovation, precision, and responsibility go hand in hand. We aim to create value not only through our products but also through how we treat each other, our clients, our environment, and society. We believe that doing business responsibly is the only way to ensure sustainable growth and earn respect from our partners, customers, and communities. Our success lies in combining advanced technologies with ethical decision-making.

Shared values build clarity and confidence. That's why we, as management, fully support this Code and encourage every team member, as well as our partners and suppliers, to read it, understand it, and turn it into real, practical actions.

By following these principles, we protect what we've built, we earn the trust of others, and we create long-term value – together with everyone we work with.

We invite all who represent or work with GLASSBEL to act in the spirit of this Code and help us uphold the standards we believe in.

CEO & Executive Team

2. Our purpose and ethical foundations

Our purpose goes beyond manufacturing premium-quality architectural glass. We aim to shape a transparent, innovative, and sustainable future. Every day through our choices and actions, we reflect who we are and what we stand for. Acting ethically is an essential part of our work and culture.

This Code is built on the principle that each action reflects GLASSBEL's values and brand. From product development and operations to client interactions and procurement, we act according to shared principles that define our way of working:

- We take ownership – we make thoughtful, informed decisions and take full responsibility for their outcomes.
- We stay open and honest – we share information clearly and build trust through transparent communication with colleagues, clients, and partners.
- We treat people with fairness and respect – from recruitment to career growth, we ensure equal opportunities and a safe, inclusive environment for all.
- We do business with integrity – we follow the rules, act ethically, and never compromise our values for short-term gain.
- We keep the bigger picture in mind – we consider the impact of our work on customers, communities, and the environment, working for sustainable and long-term value.

3. Scope of application

This Code applies to:

- All employees of GLASSBEL, regardless of position or location
- Contractors, consultants, and temporary workers
- Suppliers and third parties acting on GLASSBEL's behalf

Every individual affiliated with GLASSBEL is expected to comply with this Code. Suppliers and partners are encouraged to align with these values as part of their cooperation with us.

4. Our core values: living the GLASSBEL Culture

Top Quality

We apply the highest standards throughout all aspects of our work – from glass processing to customer service and delivery. Quality is embedded at every stage, ensuring compliance with standards, specifications and safety requirements, delivering design excellence and a seamless experience for our clients.

Innovation

Innovation is an integral part of how we think and work. We continuously seek smarter, more effective ways to improve our products, services, and internal processes. By staying attuned to market trends and anticipating both current and future client needs, we constantly evolve and explore new applications to meet the demands of tomorrow's architecture.

Brand

GLASSBEL brand reflects the high standards that our clients and partners associate with our name – reliability, technical excellence, and long-term value. This reputation is earned through the way each employee approaches their work: with professionalism, ethical behavior, and attention to detail.

Raising People

We support continuous growth not only through internal training and upskilling but also by engaging employees in challenging projects, cross-functional collaboration, and knowledge-sharing with leading experts – both inside the company and from external partners. We encourage curiosity, initiative, and development through experience – both professionally and culturally. Wherever possible, we promote from within.

Sustainability

We treat sustainability as an integral part of quality and innovation. We use green energy, reduce emissions, and continually seek smarter, more efficient ways to operate. From developing new circular products to supporting digital processes and nature-friendly design, we aim to reduce our footprint through greener architecture and more conscious work practices.

Culture

At GLASSBEL, culture means more than just workplace atmosphere – it reflects how we think, interact, and grow. We value openness, mutual respect, and fairness, with no place for discrimination or favoritism. We believe that professionalism is shaped not only by skills, but also by curiosity, reflection, and exposure to broader artistic and cultural experiences. For us, culture is where innovation, responsibility, and human development naturally connect.

5. Compliance with laws, regulations & Internal policies

We operate in full compliance with the laws of the Republic of Lithuania and the European Union. This includes all applicable standards related to product quality, labor conditions, environmental protection, and ethical business practices.

As a company working with international clients, we also respect established principles of international trade – including fair competition, responsible sourcing, and non-discrimination. Where

specific technical or legal standards are required by clients from other jurisdictions, we follow those requirements when contractually agreed, provided they do not conflict with EU law.

Although we do not follow non-EU legislation as a rule, we ensure that our practices meet or exceed the expectations of widely recognized international frameworks – including those related to anti-corruption, forced labor, child protection, and human rights.

We expect all employees to follow these legal obligations and internal rules in their daily work. Any uncertainties should be addressed with management or the relevant department.

6. Fair Employment, Human Rights & Inclusion

We promote equality, diversity, and fairness in all aspects of employment – including recruitment, compensation, development, and promotion. We recognize the value each person brings and work to create a workplace where everyone has the opportunity to grow, contribute, and be treated with dignity.

GLASSBEL strictly prohibits:

- Child or forced labor
- Any form of workplace harassment, abuse, or disrespect
- Discrimination in any form – including unfair treatment based on gender, age, race, disability, religion, sexual orientation, or other aspects of identity

We are committed to providing a safe, inclusive, and respectful environment, where individual rights are protected, and fair pay for fair work is ensured. Our approach aligns with EU labor law, international labor standards, and the UN Guiding Principles on Business and Human Rights, all of which we integrate into our daily practices.

7. Health, Safety & Environmental commitment

We treat health, safety, and environmental responsibility as essential parts of how we work – not just formal requirements, but everyday priorities. We provide ongoing training, invest in equipment, and maintain safety procedures to reduce risks and promote a safe working environment for everyone.

While some risks can never be fully eliminated, we stay focused on prevention and act responsibly when challenges arise – always learning and looking for better ways to protect our people and improve our practices.

All employees are trained in:

- Occupational health and safety (OH&S) protocols
- Fire safety and emergency response
- Proper use of personal protective equipment.

Our environmental approach reflects a broader respect for nature. We work to reduce emissions, minimize waste, and use resources efficiently – including efforts toward circular material use and sustainable product development. We also consider the relationship between our glass solutions and the natural environment, exploring ways to reduce impact on ecosystems and support biodiversity.

8. Business integrity & anti-corruption

We conduct our business with honesty, transparency, and accountability. All employees, suppliers, and business partners are expected to act with integrity and avoid any form of unethical behavior.

GLASSBEL does not tolerate:

- Bribery or facilitation payments
- Hidden commissions, personal rewards or unofficial benefits
- Undisclosed conflicts of interest
- Fraud, document falsification, or misuse of company assets

We comply with anti-corruption laws in Lithuania, the European Union, and other relevant jurisdictions. Employees must never offer, request, or accept anything that could improperly influence business decisions.

We recognize that professional hospitality – such as client entertainment or occasional symbolic gifts – can be part of respectful business relationships. Such gestures are acceptable when they are proportionate, transparent, and not linked to any expected advantage or decision.

Any concerns about unethical conduct should be reported to management or through designated internal channels. GLASSBEL does not tolerate any negative consequences for employees who report concerns in good faith. All reports are treated confidentially, and anonymous reporting is available where permitted. Every concern is taken seriously and addressed appropriately.

9. Fair competition & antitrust

GLASSBEL is committed to fair, transparent, and lawful competition. We comply with EU and international antitrust regulations and do not engage in any practices that distort or restrict fair market dynamics.

This includes a strict prohibition of price fixing, market allocation, and the sharing of sensitive pricing or commercial information with competitors. All business decisions – including pricing, sales terms, and customer relationships – are made independently, based on the value we offer and the needs of each project.

We compete with integrity, focusing on quality, innovation, and long-term trust – never on unfair advantage or manipulation.

10. Conflict of interest management

At GLASSBEL, we believe that business decisions should be based on professional judgment, free from personal influence or outside interests. A conflict of interest can arise when personal relationships, financial involvement, or external activities affect – or appear to affect – someone's ability to act in the company's best interest.

Such situations may include financial ties to suppliers, close personal connections that influence commercial decisions, or external work that competes with responsibilities at GLASSBEL.

While not all conflicts imply misconduct, they must be disclosed in a timely and transparent manner. Identifying and managing such situations helps preserve trust, fairness, and the integrity of our operations.

11. Confidentiality, intellectual property & data privacy

At GLASSBEL, we work with advanced technologies, custom-engineered solutions, and long-term partnerships. Trust is essential – and we protect it by safeguarding confidential information, intellectual property, and personal data.

Employees are expected to keep all non-public business information strictly confidential, including technical know-how, client data, project documentation, pricing, and internal processes. This obligation applies during employment and continues after the working relationship ends.

We also respect the privacy of our clients, partners, and colleagues. All personal data is processed in line with applicable data protection laws, including the EU General Data Protection Regulation (GDPR).

12. Responsible use of GLASSBEL assets

We are all responsible for protecting company resources and using them with care, efficiency, and respect. This includes both physical and non-physical assets – tools, equipment, time, information, and reputation.

Company property should be used only for legitimate business purposes, unless otherwise authorized. Misuse, negligence, or unauthorized personal use can harm our operations and compromise trust.

Digital security policies must also be followed to protect data, IT systems, and infrastructure.

13. Financial integrity & transparent record-keeping

GLASSBEL is committed to accurate, honest, and transparent financial practices. All records – including invoices, timesheets, contracts, and accounting entries – must reflect actual transactions and comply with applicable laws and internal procedures.

We do not allow any false or misleading documentation. Financial data must be maintained in a way that ensures accountability, traceability, and clarity for both internal and external stakeholders.

Everyone involved in financial processes is responsible for upholding the highest standards of integrity. Reliable records are essential to sound decision-making, legal compliance, and the trust of our clients, partners, and institutions.

14. Commitment to quality, innovation & customer trust

Quality and innovation are part of our everyday responsibility: not just towards clients, but also towards the work we do and the standards we represent. Each solution bearing the GLASSBEL name must meet high expectations in terms of performance, precision, and long-term value.

We commit to:

- ISO 9001-certified quality systems
- Traceable production, clear documentation, and technical transparency
- Reliable data on product characteristics, warranties, and use conditions

We listen to our clients, respond with expertise, and aim to provide solutions that are effective, sustainable and built to last. We believe that real quality is built by people: it depends on the knowledge, care, and ethical approach of every team member. This is how we earn trust and maintain it.

15. Environmental responsibility & sustainability

Environmental responsibility at GLASSBEL begins with how we plan, produce and innovate, and it continues in the choices we make to reduce impact and preserve resources.

We are ISO 14001 certified and committed to reducing our environmental impact through resource efficiency, waste reduction, and the use of renewable energy. We invest in technologies that support circular solutions, including material reuse and nature-conscious product design.

Sustainability for us means balancing innovation and performance with respect for natural resources, climate goals, and future generations. Every team member contributes to this effort – by following responsible practices, thinking long term, and supporting our shared environmental values.

16. Communication, media & brand responsibility

The way we communicate reflects who we are. Whether it's an internal message or an external announcement, every word plays a role in shaping our reputation. That's why we expect communication to be clear, respectful, and aligned with our values and brand identity.

Only designated representatives may speak on behalf of GLASSBEL to the media, in public forums, or when addressing external audiences. This includes press interviews, publications, social media posts, and formal presentations. Employees must not disclose confidential information, present personal views as company positions, or engage in public discussions that could damage our credibility.

The GLASSBEL brand is built on quality, innovation, and professionalism. We maintain this reputation by communicating responsibly across all channels, whether interacting with clients, sharing content online, or representing the company at events.

17. People growth, workplace culture & internal dialogue

We believe that the development of people is key to the long-term strength of our company. Growth at GLASSBEL is not limited to formal training – it also happens through daily collaboration, responsibility, exchange of ideas, and learning from others. Everyone should have the opportunity to grow, contribute, and be supported in their development.

We value a workplace culture based on respect, fairness, and openness. There is no place for discrimination, harassment, or favoritism. We encourage curiosity, dialogue, and shared accountability, knowing that a healthy work environment depends on mutual trust and professionalism.

Internal communication is a two-way street. Everyone is encouraged to speak up, ask questions, and take part in conversations that shape how we work and improve together.

18. Social responsibility & supply chain ethics

Social responsibility means acting with awareness of how business decisions affect people, communities, and the environment. It includes respect for human rights, responsible resource use, and fair working conditions throughout the value chain.

Ethical conduct is expected not only within our company, but also across our supply chain. We work with partners who uphold similar principles – from labor standards and environmental responsibility to transparency and anti-corruption.

Long-term relationships are built on trust and shared values. Wherever possible, we support local communities, promote responsible sourcing, and take part in initiatives that contribute to sustainability and social progress.

19. Reporting violations & whistleblower protection

Everyone has a role in maintaining our ethical standards. If you see or suspect behavior that goes against this Code, company policies, or legal obligations, you are encouraged to report it through internal channels or directly to management.

All concerns will be taken seriously and treated confidentially. Reports made in good faith will not result in retaliation, even if the concern turns out to be unfounded. Protecting those who speak up is essential to an open, responsible culture.

Clear, timely reporting helps us prevent misconduct, correct mistakes, and improve our organization. When in doubt – ask, raise the issue, or seek guidance.

20. Responding to violations

Compliance with this Code is expected from all employees, as well as business partners acting on GLASSBELs behalf. When breaches occur, appropriate action is taken, based on the nature of the situation and with respect for fairness and consistency. The goal is not to punish, but to protect our culture, uphold our values, and ensure accountability.

21. Acknowledgment & continuous improvement

Understanding and applying this Code is part of everyone's responsibility. New employees are introduced to it during onboarding and may be asked to confirm their awareness in writing.

We value open dialogue and welcome feedback, questions, or suggestions that help keep our standards clear, relevant, and practical.

10.09.2025, Klaipeda