

UAB "SCT LUBRICANTS" ANTI-SLAVERY POLICY

V1 20.12.22

1. POLICY STATEMENT

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in our business dealings and relationships and are committed to preventing modern slavery in our own business and to helping prevent modern slavery in our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. Under the Modern Slavery Act 2015, we are legally required to disclose the steps we take to tackle modern slavery. We expect the same high standards from all of our employees and suppliers.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, suppliers, seconded workers, volunteers, and interns.

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1.5 This policy does not form part of any UAB “SCT Lubricants” employee's contract of employment and we may amend it at any time.

2. RESPONSIBILITY FOR THIS POLICY

2.1 The General director has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Legal and People departments have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal procedures.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Guidance on the policy can be obtained from the Legal and People teams.

3. COMPLIANCE WITH THIS POLICY

3.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.2 You must notify your manager (or your main point of contact at UAB "SCT Lubricants", if you are a supplier) as soon as possible if you believe or suspect that a breach of this policy has occurred, or may occur in the future.

3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains or any supplier tier at the earliest possible stage.

3.4 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager (or your main point of contact at UAB "SCT Lubricants", if you are a supplier) as soon as possible.

3.5 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitute any of the various forms of modern slavery, you should raise it with your manager (or your main point of contact at UAB "SCT Lubricants", if you are a supplier).

3.6 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment by UAB "SCT Lubricants" as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief People Officer immediately.

4. BREACHES OF THIS POLICY

4.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

4.2 We may terminate our relationship with other individuals and organizations working for us or on our behalf (including suppliers) if they breach this policy



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