

UAB "SCT LUBRICANTS" ETHIC GUIDES

Updated January 2022

"THIS DOCUMENT PROVIDES A REFERENCE FOR THE EVERYDAY CONDUCT OF ALL UAB "SCT LUBRICANTS" EMPLOYEES"

This document provides a reference for the everyday conduct of all UAB "SCT Lubricants" employees, at all levels of the company and in all countries where it operates, since conducting our business as professionals, treating our customers with respect and meeting our responsibilities means, quite simply, doing our job properly.

CONTENT

OUR VALUES.....03

OUR RULES OF CONDUCT.....05

OUR ACTIONS.....07

OUR ORGANIZATION.....10

INTRODUCTION

This Ethics Guide is of vital importance for UAB "SCT Lubricants".

As the UAB "SCT Lubricants" values translate into both its rules of conduct and its actions, this involves creating the conditions for the day-to-day ethics that are a primary focus of its governance. UAB "SCT Lubricants" is an ethical orga nization and must be accountable for this and the values that it proclaims contribute to establishing its legitimacy as a company.

The Ethics Guide, by presenting the values that UAB "SCT Lubricants" wishes to promote internally, is a point of reference for ethical behavior. An instrument to guide behavior and a tool for internal cohesion.
Values as well as the rules of conduct and actions that stem from them are part of the general requirement for compliance, which aims to prevent legal and reputational risks. These are major strategic challenges for UAB "SCT Lubricants", as for any company.

Because environmental services are at the heart of its businesses, UAB "SCT Lubricants" contributes to environmental conservation and economic development and strives for continuous progress in the careful management of natural resources, the fight against climate change, pollution reduction, the preservation and development of biodiversity and the improvement of the health and well-being of the populations.

UAB "SCT Lubricants" is aware of its responsibilities and places great importance on upholding the values and rules of conduct described below with regard to its employees as well as fostering these values and rules with regard to its other stakeholders - particularly its customers, suppliers.

This guide, which integrates ethics into the UAB "SCT Lubricants" governance, aims to ensure compliance with:

- The values and rules of conduct specific to UAB "SCT Lubricants";
- International initiatives that the UAB "SCT Lubricants“ has joined, in particular the international human rights law and the OECD Guidelines for Enterprises;
- Local laws.

In a complex and multicultural world in constant change, this guide provides a basis for a shared set of ethics and serves as a reference for all employees. It should enable them to act as guarantors of these values and to perform their duties with full knowledge of their rights and obligations regarding the company and its stakeholders.

OUR VALUES

The UAB “SCT Lubricants” core values are responsibility, Community spirit, respect, innovation and customer focus. They form the base on which our economic, social and environmental performance is built.

RESPONSIBILITY

Externally, UAB “SCT Lubricants” intends to participate actively in building a society that is committed to sustainable development. As a key player in the field of environmental services, the UAB “SCT Lubricants” assumes responsibility on a day-to-day basis for the public good, in particular by:

- Promoting the harmonious development of territories;
- Improving the living conditions of popu- lations affected by its activities and protecting the environment, its core business.

Internally, UAB "SCT Lubricants" is committed to encouraging professional skills development and improving workplace health and safety for individuals (preventing workplace accidents), along with the security of all employees and facilities managed by the UAB "SCT Lubricants".

In return for this responsibility for employees, UAB "SCT Lubricants" expects them to be unwaveringly loyal to the company and comply with its values and the rules of conduct outlined in this guide.

With these actions, UAB "SCT Lubricants" strives for continuous progress with respect to all of these major issues.

“RESPONSIBILITY FOR COUNTRIES, POPULATIONS AND EMPLOYEES”

COMMUNITY SPIRIT

At UAB “SCT Lubricants”, whose activities serve collective and shared interests, this value applies to the relationships entered into with all stakeholders whose expectations the UAB “SCT Lubricants” endeavors to meet. This value is particularly demonstrated by the development of solutions that make it possible to provide essential services for all, which the UAB “SCT Lubricants” considers to be one of its societal responsibilities.

RESPECT

This value guides the individual conduct of all UAB “SCT Lubricants” employees and is expressed by compliance with the law and the UAB “SCT Lubricants” internal rules and through the respect shown to others. The subject of legal compliance is an opportunity to reemphasize the importance of integrity and honesty at UAB “SCT Lubricants”. These principles form the basis for the absolute prohibition of corruption in Lithuanian law, as is the case in most foreign legal systems.

INNOVATION

UAB “SCT Lubricants” has placed research and innovation at the center of its strategy in order to develop durable solutions for its customers, the environment and society. Through innovation, the UAB “SCT Lubricants” is able to seek ever-better efficiency and quality in its process of manufacture.

CUSTOMER FOCUS

We uphold codes of transparency and ethics that allow us to build long-lasting and trusting relationships with our customers based on integrity, mutual respect and non-discrimination. UAB “SCT Lubricants” listens to its customers and meets their technical, economic, environmental and societal expectations by providing adapted and innovative solutions.

“COMPLIANCE WITH THE LAW AND THE INTERNAL RULES AND RESPECT SHOWN TO OTHERS”

OUR RULES OF CONDUCT

UAB “SCT Lubricants” has adopted rules that apply to all employees and all levels of the company while carrying out its activities:

COMPLYING WITH LAWS AND REGULATIONS

For UAB “SCT Lubricants”, compliance is an essential requirement. This is demonstrated by the bodies and procedures put in place, which can detect legal risks by complying with the national, European and international standards that apply to the company.

Far from being seen as a constraint, compliance is proving itself to be an internal management and development tool. It is important for accountability and stren- gthens employee cohesion around a common culture of compliance, where respecting standards is seen as a value.

To do this, the UAB "SCT Lubricants" also makes its employees aware of applicable legislation and regulations.

COMBATING CORRUPTION OF PUBLIC AND PRIVATE OFFICIALS AND INFLUENCE PEDDLING

UAB “SCT Lubricants” intends to fight against corruption in all countries where it does business. UAB “SCT Lubricants” therefore regularly makes its employees aware of the regulations to which it is subject.

The code of conduct provided for by this law defines and illustrates the kinds of behavior to avoid that are typical of corrup- tion and influence peddling.

“COMPLIANCE WITH THE LAW AND THE INTERNAL RULES AND RESPECT SHOWN TO OTHERS”

PREVENTING CONFLICTS OF INTEREST

Employees must prevent or avoid any situation that creates or may create apparent conflict between their personal interests and those of the UAB “SCT Lubricants”.

An employee’s personal interest includes any benefit obtained for themselves or for family members, friends, close relations or persons or organizations with whom they have, or have had, a business relationship or shared interests. A conflict of interest arises when a personal interest could influence an employee’s decisions, casting doubt on their ability to carry out their professional duties and responsibilities in an impartial manner.

For example, invitations, from a public official, customer, supplier, subcontractor, commercial partner or competitor; if an employee directly or indirectly holds an equity stake, corporate office or personal financial interest in a company or organization with which the UAB “SCT Lubricants” has a business relationship or competes; or if an employee engages in outside activities with any such company or organization. If an employee has questions on any of these points, they should consult their supervisor, who will make the appro priate decisions to avoid this type of situation and protect the interests of the UAB “SCT Lubricants”.

ETHICAL COMMITMENTS IN ACCOUNTING AND FINANCIAL MATTERS

UAB "SCT Lubricants" deems it essential that its employees comply with ethical rules in financial matters, in particular when they use their expertise, make decisions and perform the tasks that are requested of them. This is important not only to prevent the risk of criminal penalties, but also to maintain the trust of the UAB "SCT Lubricants" partners, which is essential for our long-term success.

CONFIDENTIALITY

UAB "SCT Lubricants" endeavors to protect the confidentiality of all data, information, expertise, intellectual and industrial property rights and trade secrets related to its business activities, both within the UAB "SCT Lubricants" and while fulfilling its contracts.

SECURITY

Security of individuals and assets is a priority for UAB "SCT Lubricants". The company is committed to implementing measures to ensure that its employees are protected while carrying out their duties, along with those needed to protect its sites, facilities and intangible assets, all over the world. Similarly, particular attention is paid with regard to preventing any damage to the image and reputation of UAB "SCT Lubricants".

OUR ACTIONS

The Comapny's business units represent UAB "SCT Lubricants" and are therefore actively involved in both respecting values and applying the rules of behavior described in this guide regarding all stakeholders (employees, customers and service recipients, relevant local authorities and non-governmental organizations, civil society representatives, consumer and environmental protection groups, etc.).

EMPLOYEES

Each day, our employees tackle the environmental and urban challenges faced by our societies and contribute to the success of our company and strives to enable them to fulfill themselves professionally and personally by developing an effective and ambitious corporate model. Accordingly, UAB "SCT Lubricants" places great importance on basing its social initiatives on four key principles: equity, Community spirit, developing the employability of its employees and preventing health and safety risks.

Guaranteeing equity in the workplace This entails creating the conditions to best recognize what each employee contributes to the company's success, thereby enabling each individual to improve their performance. Convinced that the diversity of its employees is a significant asset for the success of its business, company strives to recognize the efforts and merits of each one and to share its project and values with them so that they feel that they have a stake in the company's performance.

“THE DIVERSITY OF THE COMPANY’S EMPLOYEES IS A SIGNIFICANT ASSET FOR THE SUCCESS OF ITS BUSINESS”

Feeling integrated, respected and equally treated is essential for employees' everyday commitment, in line with the promotion of diversity, nondiscrimination and the rejection of all forms of harassment.

Promoting Community spirit
By the nature of their jobs, UAB "SCT Lubricants" employees actively contribute to improving the living conditions of people where the company operates. UAB "SCT Lubricants" has naturally made Community spirit a primary focus of its corporate policy throughout the world. Promoting management-labor dialogue, offering support to the most fragile employees and focusing attention on the personal fulfillment of each employee are all important components of its human resources management.

Fostering the employability of employees
This entails supporting employees' skills development and encouraging employees to exchange, innovate and rise to professional challenges. In a service business, employee know-how is the primary resource. The company's aim to continuously improve the management of its human resources is bolstered by an active professional training and career support policy. UAB "SCT Lubricants" strives to continually improve its response to the constant changes in our businesses.

UAB "SCT Lubricants" encourages experience-sharing and offers motivating opportunities to its employees throughout their careers.

Being attentive to risk prevention and health and safety
This entails striving day after day to improve risk prevention policies by working closely with the employees responsible and social partners.

Our commitment, which is aligned with the health and safety guidelines of the International Labor Office, is based on our capacity to find ever-more effective solutions for improving everyday working conditions for our employees. Best practices in the areas of occupational diseases, managerial responsibility, employee awareness and worklife balance are identified and circulated throughout the company.

CUSTOMERS AND SERVICE RECIPIENTS

In its relationships with customers, UAB "SCT Lubricants" focuses above all on complying with its legal and contractual obligations.

Beyond its regulatory obligations, the company is fully committed to inventing and implementing solutions that meet the needs and expectations of its customers, both public and private, and of the beneficiaries of the services it is entrusted to provide.

Together with its customers and relevant organizations, UAB "SCT Lubricants" also strives to develop ways to improve access to essential services for all. Preserving and protecting asset integrity guarantees the quality of the company's services and performance.

SUPPLIERS AND SERVICE PROVIDERS

UAB "SCT Lubricants" sets objective criteria for selecting its suppliers and service providers in compliance with applicable laws.

These criteria are based on suppliers' performance, as well as on their observance of the ethical and sustainable development rules adopted by the company. The core values stressed in the supplier relations charter, which govern the choice of suppliers, include the prohibition of forced labor and child labor.

Combating the corruption of public and private officials is a major focus of the company's relations with suppliers, service providers and customers. In particular, company insists that its employees may only exceptionally give or receive invitations or gifts in its name. These gifts may not be financial and must be of little financial value. In the event of doubt company encourages employees to contact their supervisors.

OUR ORGANIZATION

In order to implement its values and rules of behavior, the company has set up a dedicated organization and internal procedures. This organization and these procedures mirror the various areas covered in this guide and are the subject of internal information and awareness-raising actions, as well as of legal and financial oversight and control rules.

Whistleblowing rights in UAB "SCT Lubricants"
If an employee suspects a breach of the rules of conduct set out in this Guide and thinks that informing their direct supervisors may create difficulties, or if they are not satisfied with their response, they may report the matter to the Ethics supervisor, an independent person, via the e-mail **pazeidimai@sct.lt.** This report should be carried out in compliance with the laws and rules applicable in the country where the employee lives and/or works.

The Ethics supervisor transfers alerts that come under the jurisdiction of compliance (corruption, influence peddling, anticom- petitive, practices, environmental legislation violations, money laundering, the financing of terrorism, and human rights violations) to the company Compliance Department. Company and the Ethics supervisor alike guarantee the complete confidentiality of information about employees, person s implicated by the alert and the events alleged within it.

Company undertakes that no employee will suffer any form of discrimination such as harassment or other reprisals as a consequence of exercising this whistleblowing right.



UAB „SCT LUBRICANTS“
Silutes st.119, 95112
Klaipeda, Lithuania
tel.: +370 46 340 345
e-mail: klaipeda@sct.lt

www.sct-lubricants.com