

APPROVED  
By director of Public  
Institution "Ekoagros"  
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## **PUBLIC INSTITUTION "EKOAGROS"**

### **ANTI-CORRUPTION POLICY**

#### **CHAPTER I**

#### **GENERAL PROVISIONS**

1. The anti-corruption policy (hereinafter referred to as the Anti-Corruption Policy) of the public institution "Ekoagros" (hereinafter referred to as the institution) is an internal document of the anti-corruption management system (hereinafter referred to as the AMS), which establishes the goals, objectives and principles of the Anti-Corruption Policy, the entities involved in the formation and implementation of the Anti-Corruption Policy, their main functions, encourages reporting of violations of the Anti-Corruption Policy and provides for liability for non-compliance with the provisions of the Anti-Corruption Policy.

2. Key concepts:

2.1. **conflict of interest** – a situation where an employee, in the performance of his/her job duties, is required to perform a certain action, but that action (activity) is related not only to his/her duties, but also to his/her private interest ;

2.2. **bribery** – a promise or agreement by a civil servant or equivalent person, either personally or through an intermediary, to accept an illegal or unjustified reward (material or immaterial, with or without economic value on the market), i.e. a bribe for a desired act (action or inaction) , and a demand or provocation to give a bribe and the acceptance of a bribe;

2.3. **unethical behavior** – behavior that contradicts the provisions of employee ethics and behavior set out in the Code of Ethics (Conduct) of the Public Institution "Ekoagros" ;

2.4. **nepotism** – of your family members, relatives and other close people (and cohabitants, partners) guardianship and patronage, using current position, name and power;

2.5. **illegal gifts** – any items, money, gift vouchers, services, exclusive benefits or discounts provided to an employee in connection with the performance of his duties, except for gifts received or provided in accordance with international protocol or traditions that are

usually related to the duties of a person working in a public service or institution, as well as gifts intended for representation (state, institution, company and other symbols, calendars, books and other informational publications);

2.6. **bribery** – any items, money, gift certificates, services, exclusive benefits or discounts provided to an employee in connection with his/her duties, except for gifts received in accordance with international protocol or traditions that are usually related to the employee's duties, and gifts intended for representation (state, institutional and other symbols, calendars, books and other informational publications);

2.7. **trading in influence** – illegal actions using one's position, authority or other probable influence in order to influence an institution, organization, civil servant, etc., so that they act or refrain from acting legally or illegally in the exercise of their authority;

2.8. **abuse** – an employee (action or inaction) when the official position is used not in the interests of the service or not in accordance with laws or other legal acts, or for selfish purposes (illegally misappropriated or transferred to others property, funds, etc.), or due to other personal incentives, and actions of the employee that exceed the granted powers or are arbitrary ;

2.9. **business partner** – an external party with which the institution has established or intends to establish relevant legal relationships (clients, users, contractors, consultants, subcontractors, suppliers, vendors, advisors, representatives, intermediaries, etc.);

Other concepts are defined in the Lithuanian standard LST/ISO 37001:2017 ( "Anti-corruption management systems. Requirements and guidelines for use") (hereinafter referred to as the Standard), the Law of the Republic of Lithuania on the Prevention of Corruption and other legal acts.

3. By means of this Anti-Corruption Policy, to comply with the requirements of the laws and other legal acts of the Republic of Lithuania in the field of corruption prevention, the requirements of the anti-corruption management system implemented in the institution, as well as other legal acts of the Republic of Lithuania, and not to tolerate any forms of corruption - conflict of interest, bribery, unethical behavior, nepotism, illegal gifts, bribery, trading in influence, abuse or other acts of a corrupt nature.

4. The provisions of the Anti-Corruption Policy apply to all employees of the institution. All relations with clients, business partners, and public sector representatives are

also based on the principles established in the Anti-Corruption Policy and in accordance with the provisions of the EMS implemented in the Institution .

5. The anti-corruption policy has been prepared in accordance with the Standards, the Law on the Prevention of Corruption of the Republic of Lithuania, and also takes into account the specifics of the agency's activities, mission and values.

## **CHAPTER II APPLICABLE PRINCIPLES**

6. The institution, when formulating and implementing the Anti-Corruption Policy and AMS, is guided by the following principles:

6.1. **Legality.** The implemented AMS measures may not contradict the laws of the Republic of Lithuania and other legal acts regulating anti-corruption activities.

6.2. **Personal example of managers.** The personal example of managers is a key factor in forming intolerance to corruption in a cultural institution and a guarantee of the implementation of an effective EMS.

6.3. **Employee involvement.** Constantly informing employees about the Anti-Corruption Policy implemented in the company and involving them in the implementation of individual anti-corruption control measures.

6.4. **adequacy of anti-corruption controls to the risk of corruption.** Development and implementation of new anti-corruption controls to reduce the risk of corruption, taking into account the level of identified corruption risks.

6.5. **effectiveness of the implementation of anti-corruption control measures.** The institution gives priority to such anti-corruption control measures, the implementation of which is not complicated, the impact is likely to yield significant benefits and their implementation will not become a burden for the institution.

6.6. **Inevitability of liability.** Every employee of the institution who has committed an act of a corrupt nature, regardless of the position held, functions performed or merits, is liable to the institution in accordance with the procedure established by legal acts.

6.7. **continuous control, monitoring and improvement** . In order to continuously improve the EMS, the institution regularly monitors the implemented anti-corruption measures and assesses the effectiveness of the Anti-Corruption Policy.

**CHAPTER III**  
**THE GOAL, OBJECTIVES OF ANTI-CORRUPTION POLICY, ITS FORMATION AND IMPLEMENTATION SUBJECTS AND THEIR FUNCTIONS IN IMPLEMENTING THE EMS**

7. The goal of the anti-corruption policy is to create an effective AMS in the institution, which would provide an opportunity to identify the corruption risk arising in the operational processes and, after assessing it, select proportionate and effective anti-corruption and other control measures that provide an opportunity to reduce the identified and currently unacceptable corruption risk to an acceptable corruption risk level.

8. The objectives of the anti-corruption policy and the measures planned to implement them for a specific period are approved by order of the director of the institution.

9. The main entities responsible for the formation and implementation of the Anti-Corruption Policy and EMS of the Institution are the Director of the Institution, the Executive Officer of the Anti-Corruption Compliance Function appointed by order of the Director of the Institution (hereinafter referred to as the Executive Officer of the Anti-Corruption Compliance Function), employees appointed by order of the Director of the Institution , responsible for separate anti-corruption compliance functions (if necessary) , and heads of structural departments .

10. The director of the institution is responsible for the implementation of the AMS in the institution and its compliance with the Standard and ensures that sufficient resources are allocated and the functions necessary for the effective and efficient implementation of the AMS are properly distributed. The functions of the director of the institution in implementing the AMS are detailed in the Anti-Corruption Management System guide of the Public Institution "Ekoagros" (hereinafter referred to as the AMS Manual) and in other internal documents of the institution regulating the AMS processes.

11. The anti-corruption compliance officer is to supervise the implementation of the institution's EMS. In implementing this task, if necessary, the anti-corruption compliance officer has the right to directly address the director of the institution. The powers of the anti-corruption compliance officer are detailed in the AMS guide and other internal documents of the institution regulating AMS processes.

12. If necessary, the director may appoint employees responsible for the implementation of individual anti-corruption compliance functions, setting specific tasks and

functions for them. These employees coordinate their activities in the field of anti-corruption policy and AMS implementation with the executive of the anti-corruption compliance function.

13. The Heads of the structural departments of the institution must ensure that the requirements of the Anti-Corruption Policy and AMS are applied and that these requirements are complied with in the structural units under their management.

14. All employees of the institution are personally responsible for understanding, implementing and applying the Anti-Corruption Policy and AMS requirements that are relevant to their duties in the institution.

#### **CHAPTER IV EXPRESSION OF CONCERN**

15. The institution's employees are encouraged to be vigilant in implementing the AMS and, in cases where they learn or suspect a possible attempt to commit or commit an act of corruption, a violation of public and private interests or established rules of conduct, to express their concern by informing the anti-corruption compliance function executive or the director of the institution or in accordance with the procedure established in the Description of the Procedure for Providing Information on Violations in the Public Institution " Ekoagros" (TV-29).

16. The institution supports employees who express concerns about violations of the Anti-Corruption Policy and AMS requirements, possible cases of corruption, violations of public and private interests or established rules of conduct. The institution undertakes to ensure the anonymity of the employee (at his/her request) and otherwise protect the person and information and take measures to ensure that an employee who expresses concerns about a possible violation of the institution's Anti-Corruption Policy, a case of corruption, a violation of public and private interests or established rules of conduct does not experience retaliation, discrimination or otherwise be dealt with.

17. The Institution also encourages its clients, business partners and all other interested parties to report violations or suspected violations of the Anti-Corruption Policy implemented by the Institution by submitting a report to the Institution's trust line by phone No. +370 700 55006 or by e-mail [ekoagros@ekoagros.lt](mailto:ekoagros@ekoagros.lt). The Institution guarantees that it will not disclose the identity of the person submitting the report and will take all measures to protect persons reporting violations of the Anti-Corruption Policy from any possible negative consequences.

18. The provisions on whistleblower protection specified in paragraphs 16–17 of this Anti-Corruption Policy also apply in cases where it turns out that the information provided by a person is incorrect or unconfirmed.

19. Received reports, taking into account their content, are investigated, analyzed and responses are provided to the persons who submitted the report in accordance with the procedure established by the institution's internal legal acts. Reports may not be forwarded to the structural unit or employee about whose actions the reporter expressed concern.

## **CHAPTER V RESPONSIBILITY**

20. The institution's Anti-Corruption Policy is an important part of the formation of organizational culture and employee behavioral norms, therefore the director of the institution encourages and obliges all employees to comply with the provisions of the implemented Anti-Corruption Policy.

21. Violation of the provisions of the anti-corruption policy is considered a violation of work duties and is subject to liability established in the laws of the Republic of Lithuania and the internal legal acts of the institution .

22. In cases where a violation of the Anti-Corruption Policy has the characteristics of a criminal act, the competent authorities are notified and the liability provided for in the laws of the Republic of Lithuania is applied for these acts.

23. All cases of violations of the Anti-Corruption Policy committed by the institution's employees are made public.

## **CHAPTER VI FINAL PROVISIONS**

24. All existing and newly hired employees of the institution must familiarize themselves with and confirm in writing that they have familiarized themselves with the Anti-Corruption Policy and undertake to comply with its provisions.

25. The institution seeks to ensure that all of its business partners and clients comply with the requirements set out in this Anti-Corruption Policy, therefore the Anti-Corruption Policy is publicly announced.

26. Representative of the Institution, i.e., persons representing its interests or acting on its behalf, who are not employed at the Institution, shall familiarize themselves with the Description of the Anti-Corruption Policy and undertake to comply with the provisions thereof.