

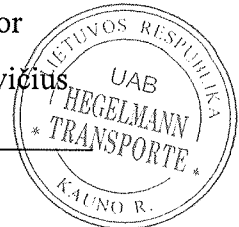
**UAB "HEGELMANN TRANSPORTE", 300022163**

CONFIRM

General Direktor

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**EQUAL OPPORTUNITIES POLICY AND  
IMPLEMENTATION PROCEDURE**

## CHAPTER I INTRODUCTION

1. The equal opportunities policy of UAB “HEGELMANN TRANSPORTE” (hereinafter - the Company) and the procedure for its implementation (hereinafter - the Procedure) determine the principles of equal opportunities in the Company and the conditions and procedure for their implementation at work.

2. The purpose of this Procedure is to ensure that the provisions of Article 29 of the Constitution of the Republic of Lithuania, which establishes the equality of persons and the prohibition to restrict human rights and privileges on the basis of gender, race, nationality, language, origin, social status, faith, convictions or views, are implemented in the Company. Also, that job applicants or existing employees will not be treated less favourably if this is not related to the quality of the work they do or to other qualities.

3. The Labour Council has been informed and consulted on the adoption of this Procedure (when the Labour Council will be formed).

## CHAPTER II CONCEPTS

4. **Discrimination** - direct and indirect discrimination, harassment, or directing discrimination on the grounds of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin, religion.

5. **Ethos** - a set of beliefs, values, moral attitudes and traditions that determine the behaviour or norms of a person or a group of persons.

6. **Equal opportunities** - the implementation of human rights enshrined in international human and civil rights instruments and the laws of the Republic of Lithuania regardless of gender, race, nationality, language, origin, social status, faith, beliefs or opinions, age, sexual orientation, disability, ethnicity, religion.

7. **Indirect discrimination** - an act or omission, a rule of law or criterion of assessment, a facially neutral condition or a practice which is formally identical but which, when implemented or applied, results or is likely to result in an actual or potential actual restriction of the enjoyment of rights, or in the granting of a preference, advantage or preference on grounds of gender, race, nationality, language, origin, social status, religion, belief or opinion, age, sexual orientation, disability, ethnic origin, religion, unless the act or omission, rule of law or criterion of assessment,

condition or practice is justified by a legitimate aim and is pursued by appropriate and necessary methods.

8. **Harassment** - unwanted conduct which, on the grounds of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin, religion, is intended to offend or violate the dignity of a person and is intended to create or creates an intimidating, hostile, degrading or offensive environment.

9. **Sexual harassment** - unwanted abusive conduct of a sexual nature, whether verbal, written or physical, towards a person, where such conduct is motivated by the intention or effect of such conduct to violate the dignity of a person, in particular by creating an intimidating, hostile, degrading or offensive environment.

10. **Social status** - a person's situation, which is determined by his or her marital status, education, qualifications or training and studies at research and study institutions, possessions, income, need for state support as defined by law, and/or other factors related to the person's financial situation.

11. **Direct discrimination** - treatment of a person on the grounds of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin, or religion, whereby he or she is treated less favourably than another person is, has been, or would be treated in similar circumstances, with the exception of:

1) age restrictions imposed by law where a legitimate aim justifies it and that aim is pursued by appropriate and necessary methods;

2) the legal requirement to speak the national language;

3) in cases provided for by law, exclusion from political activity;

4) different statutory rights based on nationality;

5) special measures have been established in the field of health protection, occupational safety, employment, and the labor market in order to create and apply conditions and opportunities that guarantee and encourage integration into the work environment;

6) special temporary measures provided for by law to ensure equality and prevent violations of equal opportunities on the grounds of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin or religion;

7) where the nature of the professional activities in question, or the conditions under which they are carried out, make a particular human characteristic an essential and decisive occupational requirement, and where that aim is legitimate and the requirement is proportionate;

8) where a legitimate aim justifies the imposition of restrictions, special requirements or conditions on the basis of a person's social situation, and this aim is pursued by appropriate and necessary methods;

9) the granting of benefits on the grounds of age, disability and social status, where this is justified by a legitimate aim and that aim is pursued by appropriate and necessary means.

### **CHAPTER III GENERAL PROVISIONS**

12. The employer must implement the principles of gender equality and non-discrimination on other grounds. This means that direct and indirect discrimination, harassment, sexual harassment, instruction to discriminate on the grounds of gender, race, nationality, language, origin, social status, age, sexual orientation, disability, ethnicity, membership of a political party or association, religion, belief or opinion, except in relation to a person's religion, shall be prohibited in any relationship between the employer and employees, religion, belief or conviction, in the case of employees working in religious communities, societies or centres, where it is customary, lawful and justified to require an employee to have a religion, belief or conviction on the basis of the religion, belief or conviction of the person concerned, in the light of the ethos of the religious community, society or centre, on the basis of the intention to have a child/children, on the basis of circumstances unrelated to the employee's personality or on any other grounds laid down by the law, are prohibited.

13. In order to implement equal opportunities, the employer shall apply the same selection criteria and conditions for admission to employment, irrespective of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin, religion, except as provided for in paragraph 11(7). Recruitment and the recruitment process shall be determined solely on the basis of a person's personal qualities and the criteria relevant to the work of the post concerned. In all cases, the focus shall be on the ability to perform the job well.

14. All employees are given equal opportunities during working hours. For the purposes of pay discrimination cases, remuneration is defined as the wages or any other remuneration, including remuneration in cash or in kind, which an employee receives directly or indirectly from an employer in return for his or her work..

15. **UAB "HEGELMANN TRANSPORTE"** organises its work in such a way that all sectors of society are represented in the workforce, and that every employee feels respected and able to make the most of his or her skills.

16. The Company's organisation creates an environment in which the individual differences and contributions of all its employees are recognised and valued. Every employee has the right to work in an environment that promotes respect for the dignity of each individual. In cases of gender equality and non-discrimination on other grounds in the employment relationship, where an

employee has alleged circumstances which suggest that the employee has been discriminated against, the employer has the burden of proving that there has been no discrimination.

17. All employees are given opportunities to learn, develop their skills and advance professionally.

18. **UAB "HEGELMANN TRANSPORTE"** organises its activities in such a way as to ensure equal working conditions for all its employees, to provide them with the opportunity to improve their qualifications, to undertake vocational training, to retrain, to acquire practical work experience, and to provide them with equal benefits irrespective of their gender, race, nationality, language, origin, social status, religion, beliefs, or opinions, age, sexual orientation, disability, ethnic origin, or religious belief.

19. All employees must comply with this policy to ensure equal opportunities and avoid discrimination. Employees shall not discriminate against, harass, bully or intimidate other employees on the basis of their gender, race, nationality, language, origin, social status, religion, belief or opinion, age, sexual orientation, disability, ethnicity, religion, and shall not harass or take any other form of action against such employees who make unfounded allegations.

20. Violation of this Procedure will be considered as a breach of employment obligations. Such violations will be subject to the penalties provided for in the Labour Code of the Republic of Lithuania. Cases of discrimination detected within the Company will be immediately referred to the Equal Opportunities Ombudsman or other competent authorities for investigation.

21. The Company shall take measures to ensure that an employee who files a complaint of discrimination or who is involved in a case of discrimination, or his or her representative, or a person testifying and providing explanations regarding discrimination, is not subject to harassment and is protected from hostile treatment or adverse consequences.

22. **UAB "HEGELMANN TRANSPORTE"** shall take reasonable steps to ensure that persons with disabilities are able to obtain employment, work, pursue a career or receive training, including reasonable accommodation, provided that such measures do not result in a disproportionate impairment of the Company's obligations.

23. The Company shall take measures to ensure that employees are not discriminated against in the workplace with regard to the granting of paternity leave, parental leave, unpaid leave to care for a sick family member or for the care of a person living with the employee or civil servant, and the provision of flexible working arrangements.

**CHAPTER IV**  
**RECRUITING NEW EMPLOYEES AND DISMISSING CURRENT EMPLOYEES**

24. **UAB „HEGELMANN TRANSPORTE“** welcomes diversity in its workforce and strives to ensure that all applicants are treated fairly and that they are recruited only on the basis of their abilities and qualifications.

25. At the time of recruitment, only the most suitable candidates for the position must be selected, taking into account their experience and qualifications.

26. The selection process for new employees is carried out systematically for all job offers at all levels. The selection criteria for all vacancies are clearly defined and described in detail.

27. The company's job offers are published on online job portals. Vacancy announcements are prepared in such a way that they do not allow only candidates of a particular gender, race, nationality, language, origin, social status, religion, belief or opinion, age, sexual orientation, disability, ethnicity, religion to compete for a vacancy. The Company's job advertisements highlight the Company's commitment to equal opportunities.

28. The selection of new employees of the Company is based on vacancies, suitability and ability to perform the job, and the information obtained from candidates will be limited to qualifications relevant to the requirements of the job.

29. Employees responsible for selecting, interviewing and appointing candidates are clearly informed of the selection criteria and the requirement to implement an equal opportunities policy. At least two members of **UAB „HEGELMANN TRANSPORTE“** recruitment staff shall be present at the interview whenever possible.

30. All questions asked of candidates for vacant posts relate to the selection criteria. The interviewing personnel may not ask any questions about the candidate's gender, age, sexual orientation, social status, disability, race or ethnic origin, religion, beliefs or faith, or make assumptions about the candidate's role in the home and family, insofar as these are not directly related to the application of the guarantees provided for in the Labour Code to the employee.

31. Candidates with disabilities who so indicate when applying for a vacancy will be provided with appropriate facilities during the interview process (e.g. easily accessible interview rooms or the assistance of a sign language interpreter) in order to ensure that they are given equal opportunities with other candidates.

32. In deciding whether to fire an employee, the criteria for firing are applied equally to all employees, regardless of gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin or religion.

## **CHAPTER V**

### **EMPLOYEE EDUCATION**

33. In line with its strategic objectives and financial capacity, the company organises training for its employees to:

33.1. Raise staff awareness of the prevalence and harmfulness of discrimination and prejudice based on gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnicity, religion;

33.2. Educate employees about the direct and indirect nature of discrimination and the conditions under which it can occur and how it can be avoided;

33.3. Familiarise employees with the legislation in force and its application in the field of equal opportunities;

33.4. Assist managers and employees to avoid breaches of equal opportunities policies and legislation and provide training in conflict resolution.

## **CHAPTER VI**

### **SALARY SETTING AND PROMOTION**

34. **UAB “HEGELMANN TRANSPORTE”** must have a procedure for determining, allocating and calculating the salary.

35. In determining the remuneration of specific employees, the Company shall be guided exclusively by objective criteria relating to the qualifications of the employee, the degree of responsibility of the employee, the nature of the work to be performed, the results to be achieved and other objective criteria, which shall be set out in a separate document. It shall be prohibited to take into account a worker's gender, race, nationality, language, origin, social status, religion, beliefs or opinions, age, sexual orientation, disability, ethnic origin, religion in determining remuneration.

36. All workers must be paid the same salary for the same or equivalent work, regardless of their gender, age, sexual orientation, social status, disability, race or ethnic origin, religion, belief or faith. Same work means the performance of a work activity that is, according to objective criteria, identical or similar to another work activity to the extent that the two workers can be interchanged without significant cost to the employer. Equivalent work means that it is, according to objective criteria, no less skilled and no less important to the employer's achievement of its performance objectives than the other comparable work.

37. The criteria used for the selection of candidates for promotion shall relate solely to an individual's abilities and the quality of his/her work and his/her personal achievements in his/her professional field, and no member of staff shall be, or shall be subject to, any discrimination on the grounds of gender, race, ethnic origin, language, origin, social status, religion, belief, creed, or opinion, age, sexual orientation, disability, nationality, or ethnic or religious origin.

38. Annual or other periodic performance appraisals shall be carried out on the basis of the same criteria for all employees, irrespective of the employee's sex, race, nationality, language, origin, social status, religion, creed or belief, age, sexual orientation, disability, ethnic origin, religion or any other circumstance unrelated to the occupation of the employee's position in the performance of his/her job duties, his/her occupational achievements or his/her individual performance.

## **CHAPTER VII PROTECTION OF EMPLOYEES**

39. **UAB "HEGELMANN TRANSPORTE"** take steps to ensure that the employee is not subjected to harassment, sexual harassment, or instructions to discriminate in the workplace, and is not victimised and is protected from hostile treatment or adverse consequences if he or she makes a complaint or is involved in a case concerning discrimination.

40. All employees of the Company and applicants for vacancies who believe that their equal opportunities are being violated or that they are being discriminated against shall have the right to contact the Head of the Company and to identify the person who may be violating the employee's rights or who may be discriminating against the employee.

41. The Company, having received a complaint from an employee or a candidate for a vacant position regarding a violation of equal opportunities or discrimination, shall immediately refer such complaint to the Office of the Equal Opportunities Ombudsman or other competent authority for investigation. Information concerning such a complaint shall be treated as confidential and shall not be disclosed to persons who are not involved in the alleged infringement or its investigation.

42. **UAB "HEGELMANN TRANSPORTE"** cooperate with the investigating authorities during the investigation of a possible infringement, providing all available information relevant to the investigation of a possible infringement.

43. Any form of harassment or hostile behaviour against an employee or applicant for a vacancy who has complained about discrimination or any other violation of his/her equal



opportunities is prohibited and constitutes a violation of employment obligations, which may be punishable by the Lithuanian Labour Code.

## **CHAPTER VIII CONCLUDING PROVISIONS**

44. These procedures shall be reviewed and, if necessary, updated at least once every two years or in the event of changes in the mandatory legislation governing this policy area.

45. Employees shall be made aware of this Policy, either by signature or by electronic means, and shall comply with the obligations set out in this Policy and shall be guided by the principles set out in this Policy in the performance of their job functions.

46. **UAB “HEGELMANN TRANSPORTE”** have the right to amend this policy in part or in full. Amendments shall be communicated to employees and other responsible persons either by signature or electronic means.