

10-1-14 Anti-Corruption Policy

Valid from: 2025-11-20 Release: Version 2

Policy prepared by: Quality Manager

Policy approved by: CEO

Publication: Private Public

Commented [VS1]: Turbūt reiktų pavadinti Anti-corruption policy, nes Business Ethics mano supratimu yra daug platesnis terminas, apimantis bendrai, kaip verslas elgiasi, o anti-korupcija ir kyšininkavimas yra dalis to.

ANTI-CORRUPTION POLICY

1. General provisions

Axioma Metering (hereinafter – the Company) is committed to conducting business responsibly, transparently, and sustainably. The Company maintains a zero-tolerance stance toward any form of corruption and promotes fair business practices and open communication with all stakeholders.

In its activities, the Company voluntarily relies on the Law on Prevention of Corruption and the Law on Whistleblower Protection of the Republic of Lithuania.

The Anti-Corruption Policy (hereinafter – the Policy) is the primary framework for creating an anti-corruption environment, establishing the applicable principles, obligations and procedures necessary to ensure transparency, as well as the implementation, supervision and control of the Policy.

The Policy applies to all employees of Axioma Metering.

Commented [VS2]: Turbūt ir Axioma Trade reiktų įtraukti?

Commented [MB3R2]: Atskira politika jiems (Copy - Paste)

2. Objectives of The Policy

The Policy sets out the general principles and obligations for creating a transparent corruption-resistant environment:

Legality: a transparent, corruption-resistant environment is created in accordance with the requirements of this Policy and other legal acts.

Zero tolerance for corruption: the company does not tolerate any form of corruption or corruptive actions. This principle is applied in relations with both the public and private sectors.

Avoiding conflicts of interest: all employees must perform their duties honestly, without using their current positions for personal or family benefit, and without performing activities that are otherwise detrimental to the Company or public interests.

Transparency of activities: The Company ensures openness and clarity in its activities. Key policies are made publicly available to promote accountability and trust.

Gifts and Hospitality: Refusal to provide and/or receive gifts that could be directly or indirectly understood as a reward, influence, or patronage to/from business partners.

Commented [VB4]: Mes lyg ir neskelbiam viešai? Bet jeigu bus patvirtinta tada tokį kaip šis galima skelbti. Ką dar skelbsime?

Commented [MB5R4]: Politikas skelbsime.

Commented [VB6]: Šiaip ta nulinė politika praktikoje kelia kurioziškas situacijas - esmė, kad nedovanojame ir beje nepriimame irgi dovanų, kurių vertė ar turinys gali sukelti interesų konfliktą ar jos yra susiję su siekiu daryti įtaką sprendimams etc. Nevadinčiau zero gift policy, nes ko gero privačiame versle kiek laisviau galima traktuoti. Esmė ko gero skaidrumas - gaunam/duodam dovanas viešai (praktinis įgyvendinimas gali būti dovanų registras).

Low-value promotional or protocol gifts (up to €150 or an equivalent value) that are customary and do not influence business decisions are not considered risky or corrupt.

3. Risk management

- Risk Assessments: Corruption and fraud risk assessments are carried out regularly and whenever significant changes occur in the Company's structure, operations, or external environment.
- Monitoring and Control: Top management sets risk acceptance criteria, oversees regular risk evaluations, and implements measures to mitigate corruption risks in line with the Company's risk management process (see PR-ST-10-1 Risk Management).

4. Whistleblowing and whistleblower protection

Employees have access to a confidential and secure reporting channel korupcija@axioma.eu to report suspected corruption, fraud, conflicts of interest, or money laundering.

According to Article 4 of the Law on the Protection of Whistleblowers of the Republic of Lithuania, the Company shall, no later than within 5 working days from the receipt of information about a violation, notify the person about the progress of the examination of the information provided by him or her or the refusal to examine this information. Having examined the information provided by the person, the Company shall immediately notify the person about the results of the examination.

In the report, the person shall indicate the information known to him or her:

- 1) specific factual circumstances of the violation,
- 2) the person who is preparing, participating in or participated in the commission of the violation,
- 3) whether the person has already reported this violation; if so, to whom it was reported and whether a response was received,
- 4) his or her name, surname, and contact details.

The person shall, if possible, attach to the report written or other available data about the violation. The Company, having received or examined information about the violation, shall ensure the confidentiality of the person who has submitted information about the violation.

The Company does not take any negative measures against the employee(s) who provided the information, such as dismissal, transfer to a lower position or another workplace, intimidation, harassment, discrimination, threats of violence, restriction of career opportunities, reduction of salary, change of working hours, or raising doubts about competence.

According to Article 3 of the Law on the Protection of Whistleblowers of the Republic of Lithuania, information about violations is provided due to:

- 1) danger to public safety or health, life or health of a person,
- 2) danger to the environment,
- 3) obstruction or unlawful influence on investigations conducted by law enforcement agencies or courts in the administration of justice,
- 4) financing of illegal activities,

- 5) illegal or non-transparent use of public funds or property,
- 6) illegally acquired property,
- 7) concealment of the consequences of the committed violation, obstruction of determining the extent of the consequences,
- 8) other violations.

Persons who knowingly provide false information are liable in accordance with the laws of the Republic of Lithuania. Violations of this policy may result in disciplinary action against Company employees, including dismissal.

5. Commitment

- Maintain zero tolerance for unethical behavior, illegal gifts, nepotism, bribery, kickbacks, influence peddling, abuse of power, or any form of corruption.
- Reject money laundering activities and avoid any relationship with suppliers, business partners, or customers involved in money laundering.
- Oppose terrorism financing and refrain from business relationships with state sponsors of terrorism.
- Avoid political influence: The Company does not make direct or indirect contributions to politicians, political parties, election campaigns, or organizations established by or linked to political figures.
- Comply with all applicable national and international anti-corruption and anti-bribery laws in every country where the Company operates.

6. Validity and document management

This Policy is reviewed at least once a year or whenever significant violations or changes arise.

The Policy is available to all interested parties.

All employees are introduced to the Policy and its amendments through the document management system (DMS) or equivalent communication channels.

7. History

Version No.	Date	Description	Reason	Released by (department)
1.	2025-04-11	Released document	New	Finance
2.	2025-11-20	Updated document	Gift price threshold established (2 Cl.), reporting channel indicated (4 Cl.), whistleblower protection added (4 Cl.)	Finance