

PLASTA HOLDINGS GROUP WHISTLEBLOWER PROCEDURE

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Misconduct affects us all. Violations of compliance can cause serious damage to the reputation of UAB "Plasta Holdings" ('the Company') and its subsidiaries ('the Group', 'the Companies of the Group') and material damage. For this reason, the Management of the Company has approved the following Whistleblower Procedure (the **Procedure**).

1. General Provisions

- 1.1 This Whistleblower Procedure (the Procedure) defines procedures for the receiving, consideration, investigation and responding actions to reports and notices on the actual or suspected violations in all Group Companies.
- 1.2 Violations may relate to non-compliance with the ethical norms and values established by the PLASTA Group, such as:
 - Human Rights, Discrimination, Transparency in Employment;
 - Health and safety standards;
 - Environmental protection;
 - Crimes committed by management staff, corruption;
 - Conflicts of interest, breaches of trust;
 - Theft, fraud, sabotage, betrayal of business or company trade secrets;
 - Data protection, and data breaches;
 - Other violations and breaches of the Code of Ethics and approved Policies.
- 1.3 The Procedure shall apply to all responsible persons identified in the Corruption and Bribery Prevention Policy and/or appointed by separate orders of every Group's Company General Manager ("GM") to implement the provisions of this Procedure in the performance of their assigned duties and/or job functions.

2. Receipt of Reports and Notifications

- 2.1 All notices shall be received electronically in the mailboxes created for this purpose for each Group Company as specified in Annex 1 to the Regulations and published on the Group's website www.plastagroup.com . Access to the mentioned mailbox shall be limited, only by each Group Company's GM appointed responsible persons ("the Responsible Person"), shall have access to the respective mailbox and ensure full confidentiality of the Whistleblower and protection of his/her identity, as provided for in the relevant legislation.
- 2.2 If reports or notifications are received by channels other than those set out in the Procedure, they shall be immediately forwarded to the Responsible Person.

- 2.3 Following an evaluation of the reports received, the Responsible Person shall forward them to the Group Company's GM, unless otherwise specified in these Procedures.
- 2.4 Upon receipt of a notification/complaint by email, the Responsible Person must, within 2 working days at the latest, send to the sender of the notification an acknowledgement that the notification has been received and will be dealt with in accordance with the terms and procedures set out in the Procedure and reassure the person who made the notification that the provisions of the Whistleblower Protection Regulations will apply in the event of the information provided by the person not being proven true.
- 2.5 The Whistleblower must also be informed that the fact of making the report and the identity of the person who made the report will not be disclosed to any third party, except if deemed needed to the Group Company's GM and those responsible for the investigation of the incident, and only in compliance with the law, the Code of Ethics and other policies of the Group, and the requirements of the internal regulations.
- 2.6 In all cases, the anonymity of the Whistleblower, the security of the person and the information shall be ensured, and measures shall be taken to protect Whistleblower from any negative consequences.

3. Investigation

- 3.1 All reports shall be investigated in accordance with the principles of objectivity and fairness.
- 3.2 The investigation shall aim to fully and completely investigate the facts, to establish the violation of a particular provision of the Policy or Code, and to identify the person(s) who committed the violation, as well as those who contributed to or benefited from the violation.
- 3.3 Investigations based on a report received shall be led by the Group Company's GM, assisted by the Responsible Person, unless the report is made by the Group Company's GM or the Responsible Person or his/her relatives. If necessary, legal counsel representing the Group Company may be involved in the Investigation.
- 3.4 If the report relates to, or there are reasonable grounds to suspect that the report relates to, a Group Company CEO or the investigation relates in any way to any of his/her relatives, the investigation shall be led by the lawyer representing the Group Company. The Group Company's GM shall notify the lawyer representing the Group Company in writing of his/her conflict of interest as soon as he/she becomes aware of it and shall refrain from further participation in the investigation unless he/she is invited to participate.
- 3.5 The Responsible Person shall inform the President of the Group Company's trade union (if any) of the receipt of the report, and the President of the Group Company's trade union shall appoint a trade union representative to the Investigation Team.
- 3.6 The person or employee conducting the investigation may delegate certain investigative activities to other employees of the Group Company, employees of the Group and/or external persons such as detectives, law firms, accounting or auditing experts and other professionals, provided that such employees or persons have no interest in the outcome of the investigation and are bound by confidentiality obligations.
- 3.7 Persons participating in the investigation shall have the right to access the Group Company's documents and information, to enter the premises, and to meet with the Group Company's employees, including confidential meetings. The Group Company's GM must ensure that the staff provides the necessary support and assistance for the investigation.
- 3.8 Without prejudice to the principles of the investigation, the investigation must be concluded as soon as possible. Normally, each case should be investigated within 45 (forty-five) days of receipt of the report. If a particular investigation cannot be completed within the specified time limit for objective reasons, the time limit may be extended by up to six (6) months by informing the Whistleblower.
- 3.9 The Person in charge of the investigation shall draw up his/her conclusions on the results of the investigation and submit them to the Board of the Company. The Whistleblower may be informed of the results of the investigation without being provided with a copy of the findings of the investigation, unless such information may prejudice legal proceedings following the investigation.

3.10 Any violations discovered during the investigation that may result in administrative or criminal liability will be reported to the appropriate law enforcement authorities. Any other violations will be considered a breach of employment duties and will result in disciplinary action as provided by law and the Group Company's internal rules (if any).

4. Documentation

- 4.1 All reports and other documents and materials (the **Documentation**) relating to a particular investigation shall be stored in the each Group Company's Documentation Archive (see Annex No.1) within the following terms:
- 25 (twenty-five) years from the date of the report, if the specific investigation reveals a breach of the Policy;
 - 2 (two) years from the date of notification, if the investigation in the particular case did not reveal an illegal act, or if the investigation was closed without sufficient information or for other reasons.
- 4.2 Access to Documentation shall be restricted and granted only with the written permission of the Group Company's GM. Copies of such Documentation shall be retained by the Company's Responsible Person for the same period of time as set out in paragraph No.4.1 and such material may only be disclosed to third parties in exceptional circumstances.

ANNEX 1 Basic information –responsible persons, contacts of the Group Companies

Plasta AB responsible persons, contacts

Channels for reporting violations	etika@plasta.lt
Ensuring confidentiality of reports, administration of reports	HR Project Manager
Investigation of policy violations	General Manager, HR Project Manager
Documentation of Whistleblowing investigation storage	HR Documentation Archive

Rullpack AB responsible persons, contacts

Channels for reporting Policy violations	ethics@rullpack.se
Ensuring confidentiality of reports, administration of reports	General Manager
Investigation of policy violations	General Manager
Documentation of Whistleblowing investigation storage	Personel Documentation Archive

Plasta GmbH responsible persons, contacts

Channels for reporting Policy violations	loretta.schnell@plastagmbh.de
Ensuring confidentiality of reports, administration of reports	General Manager of the Plasta GmbH
Investigation of policy violations	General Manager of the Plasta GmbH
Documentation of Whistleblowing investigation storage	Plasta GmbH Documentation Archive

Plasta Holdings UAB responsible persons, contacts

Channels for reporting Policy violations	maciejp@plasta.lt
Ensuring confidentiality of reports, administration of reports	CEO
Investigation of policy violations	CEO
Documentation of Whistleblowing investigation storage	Plasta Holdings Documentation Archive

Gelpod UAB responsible persons, contacts

Channels for reporting Policy violations	etika@gelpod.eu
Ensuring confidentiality of reports, administration of reports	General Manager
Investigation of policy violations	General Manager
Documentation of Whistleblowing investigation storage	Gelpod UAB Documentation Archive

Plasta Business Park AB responsible persons, contacts

Channels for reporting Policy violations	linab@plasta.lt
Ensuring confidentiality of reports, administration of reports	General Manager
Investigation of policy violations	General Manager
Documentation of Whistleblowing investigation storage	Plasta Business Park AB Documentation Archive