

Annex to the Whistleblowing Procedure

Following adoption of the resolution, in order to implement the Whistleblowing Procedure at UAB EMP Recycling, to ensure compliance with Lithuanian legal requirements, the Management Board hereby adopts the following annex.

§ 1

1. The § 8 section 11 of the Whistleblowing Procedure shall be amended and has the following meaning:

“11. Upon receipt of the Report, the Ethics Officer enters it in the Register of Reports, the template of which is attached as Annex No. 4 to this Procedure, carries out a preliminary verification of the Report, and then:

- a) closes the proceedings if he or she establishes that there is no irregularity referred to in this Procedure and specified in the received Report, as well as if the Report is obviously groundless, notifying the Whistleblower of the closure of the proceedings within 7 days from the date of receipt of the Report, as long as the Reporting Person has provided a contact address to which feedback should be sent; or
- b) informs the Whistleblower on proceeding with the examination of the Report within 2 working days from the date of receipt of the Report, as long as the Reporting Person has provided a contact address to which the confirmation should be sent, and at the same time forwards the Report for examination by the Irregularities Committee to start investigation activities.”

2. The § 9 section 4 of the Whistleblowing Procedure shall be amended and has the following meaning:

“4. An external report may be made directly to the competent authority in any of the following circumstances:

- a) the infringement is of substantial importance for the public interest;
- b) it is necessary to prevent or terminate the infringement as soon as possible because of the risk of serious damage;
- c) persons having a managerial, employment, service or contractual relationship with the institution may themselves be committing or have committed an infringement;



- d) the Report has been submitted through an internal whistleblowing channel but no response has been received or no action has been taken in response to the information submitted or the measures taken have been ineffective;
- e) there are grounds for believing that the submission of the Report through the internal whistleblowing channel may not guarantee the anonymity or confidentiality of the person who submitted the Report, or may have the effect of concealing the notified infringement or of adversely affecting the Whistleblower who submitted the Report;
- f) the institution does not have a functioning internal whistleblowing channel;
- g) the Whistleblower is unable to use the internal whistleblowing channel because he/she does not have an employment, service or other legal relationship with the institution."

Whistleblower shall contact the competent authority a form approved by the Government of the Republic of Lithuania or an institution authorised by it, or a free form notification, stating that the notification is submitted in accordance with the Law on the Protection of Whistleblowers."

3. The § 9 section 5 of the Whistleblowing Procedure shall be amended and has a following meaning:

"5. Public disclosure may be provided in order to report an imminent threat to human life, public health or the environment, where urgent action is necessary to prevent such a threat and time constraints do not allow the infringement to be reported in other ways or where the infringement has not been reported in other ways in a timely manner. Whistleblower who has made the public disclosure must apply to the competent authority in order to obtain the guarantees for whistleblowers provided for in the Law on the Protection of Whistleblowers."

4. The § 10 section 4 of the Whistleblowing Procedure shall be amended and has the following meaning:

"4. The data in the Register of Reports is stored for at least five years from the last decision made when examining this information; after this time it is deleted from the Register of Reports. The term for storing data in the Register of Reports can be extended by reasoned instruction of the competent authority."

§ 2

Other provisions of the Whistleblowing Procedure remain unchanged.