



CONFLICT OF INTEREST PREVENTION POLICY OF AS CLEANR GRUPA

1. SCOPE

The Conflict of Interest Prevention Policy of AS CleanR Grupa (hereinafter the Policy) applies to all the companies directly or indirectly owned by CleanR Grupa where CleanR Grupa is a majority shareholder and exercises full control.

2. CONFLICT OF INTEREST

2.1. A conflict of interest is a situation when a board member or employee of a capital company, while performing their work duties, has to take a decision, has to participate in the decision-making process, or has to perform other job-related activities which affect or may affect their own personal or material interests or personal or material interests of their family members or relatives, people they share the household with, or business partners.

3. PRINCIPLES OF CONDUCT OF THE BOARD AND EMPLOYEES

3.1. Board members and employees must act in a way that prevents a conflict of interest.

3.2. In case of a conflict of interest, board members and employees immediately inform their direct manager (the CleanR Grupa board members inform the Council, the board members of subsidiary companies inform the chairperson and the CleanR Grupa Board).

3.3. It is the duty of board members and employees to ensure that their activities outside the company do not negatively impact the performance of their duties at the company.

3.4. Board members and employees take decisions and act solely in the interests of the company.

3.5. Without a written consent from the employer (the CleanR Grupa board members—without a written consent from the Council; the other board members—without a written consent from the CleanR Grupa Board), employees may not occupy posts at other companies or their branches, state and municipal institutions etc., enter into an employment relationship with another employer or provide services using any form of cooperation.

3.6. Upon assuming the post and once a year until 31 May, all board members and employees submit a Conflict of Interest Statement to a human resources officer of their respective company, the latest version of which is available on the [Corporate governance](#) section of the CleanR Grupa homepage.

4. OTHER PROVISIONS

4.1. This Policy is reviewed as need arises but no less than once a year.

4.2. This Policy is accompanied by other operational principles of CleanR Grupa, which have been set out in its internal policy documents and procedures, for example, the CleanR Grupa Code of Professional Conduct, Human Resources Policy, Basic Principles of Marketing and Communication, etc., which are available on the [Corporate governance](#) section of the CleanR Grupa homepage.