



APPROVED  
at AS "CleanR Grupa" Council meeting of 08 Apr 2026.  
Decision No 1

at AS "CleanR Grupa" Board meeting of 07 Apr 2026.  
Decision No 1

## **AS "CleanR Grupa" Fair Competition Policy**

### **1. Introduction**

AS "CleanR Grupa" (hereinafter CleanR Grupa or the Group) provides society with essential services. At the same time, the Group is aware that fair competition is an essential precondition for sustainable entrepreneurship, reputation, and trust on the part of clients, business partners, and society.

The Group undertakes to comply with the competition laws of the Republic of Latvia and the European Union, as well as best corporate governance standards, ensuring that its operations are independent, lawful, ethical, and fair.

### **2. Scope**

The Group's Fair Competition Policy (hereinafter the Policy) applies to all the companies directly or indirectly owned by CleanR Grupa where the Group is the majority shareholder or exercises full operational control.

### **3. Aim**

The aim of this Policy is to lay down fair competition principles and their enforcement mechanisms across the Group, preventing the risk of potential competition law violations and promoting ethical and fair entrepreneurship.

### **4. Fair competition principles**

The Group observes the following basic principles of fair competition:

Independent business transactions—all decisions regarding prices, offers, and other competition-related matters are taken independently.

Prohibition to conclude agreements restricting competition—price fixing, market division (including agreement to participate or not to participate in procurements) or any other unlawful cooperation with competitors is prohibited.

Protection of business secrets and confidential information—disclosure of business secrets or confidential information to competitors is not allowed, as well as information containing business secrets or confidential information is not solicited from competitors. Information which is not classified as a business secret but contains data that may potentially give a competitive edge if acquired is also regarded as a business secret.

Prohibition to exploit one's market position dishonestly—one's market position is not to be used to distort competition, including abusing procurements with an unjustifiably low bid, as well as it is prohibited to subject business partners to conditions that are disproportionate and incompatible with the generally accepted commercial or industry practice

Legal compliance—the EU competition law, the Competition Law of the Republic of Latvia, and the guidelines for fair competition of the Latvian Competition Council are to be observed.

Fair and equal pricing policy—discrimination of market players by subjecting them to unequal market conditions is prohibited.

Zero tolerance against corruption and a conflict of interest—giving or accepting any kind of benefits in exchange of more favourable conditions for cooperation is prohibited; a conflict of interests is precluded.

Transparency and responsibility—decisions are documented and verifiable.

## **5. Educational work and compliance control**

The board of each subsidiary company of the Group is responsible for the enforcement of the principles stipulated in this Policy at their company, as well as acquainting employees with them, and, together with the Group's Legal Department, introducing appropriate compliance control mechanisms.

Employees are acquainted with the principles of fair competition during onboarding as well as at the annual mandatory training sessions.

Additionally, no less than once a year, the board members of the Group's subsidiary companies take part in advanced trainings on the risks related to competition law violations.

## **6. Other provisions**

This Policy is binding to all subsidiary companies of the Group and their employees.

The employees of the CleanR Grupa subsidiary companies are encouraged to report on the violations of the fair competition principles stipulated in this Policy using the CleanR Grupa whistleblowing system "Trust Line", which may be accessed via the Group's homepage [www.cleanrgrupa.lv](http://www.cleanrgrupa.lv).