#### CODE OF CONDUCT

#### 1. Scope

All businesses within the baltprom Group, as well as their staff members and our business partners, are subject to this code of conduct.

The values and tenets outlined in this CoC represent the beliefs of the baltprom Group and its standards for its business partners. It is mandatory for our staff members and business associates to adhere to the guidelines outlined in this document and fulfill their obligations.

### 2. Integrity and compliance with the law

The baltprom Group's core values are reflected in our commitment to upholding legal compliance in all spheres of activity. We establish the legal requirements in a methodical manner, recognize the statutory obligations they represent, and then make sure they are followed and evaluated on a regular basis. Each employee contributes, by their own actions, to the fulfillment of all legal and ethical requirements.

#### 3. Safety and health at work

For the baltprom Group, creating a safe and healthy work environment is of utmost importance. We take the necessary safety and health steps to shield employees from work-related risks. We also guarantee safe and healthy working environments. We constantly enhance our working conditions to lower occupational hazards and dangers, and we abide by all applicable rules and regulations to prevent accidents and health harm.

Employees of the baltprom Group are expected to work no more than 48 hours per week, including overtime, or the maximum amount of regular and overtime hours permitted by law or collective agreements.

Employees are entitled to legally mandated rest breaks and a minimum of one day off per seven days. When specifically covered by national or international law, certain employees with unusual working conditions may be exempted from this general requirement; however, over the course of 12 weeks, no employee shall be required to work more

than 40 hours per week on average, including overtime.

All commercial employees are equipped with protective equipment.

## 4. Environmental and social responsibility of corporations

The sustainability and preservation of the environment are major goals of the baltprom Group's CSR initiatives. We actively work to minimize our environmental impact and are dedicated to safeguarding natural resources. In an effort to increase energy efficiency and encourage the use of renewable energy sources, we invest in environmentally friendly technologies.

Additionally, as a specialized waste management company, we make sure that hazardous and non-hazardous waste is disposed of in an environmentally friendly manner and we assist with material reduction, reuse, and recycling. Protecting the soil and water is also one of our main concerns. We take action to protect the quality of soil and watercourses and to stop pollution of the soil and water.

We place a high value on ecologically friendly products, materials, and raw materials when selecting our suppliers. When it is feasible and economically feasible, we look critically at their additional processing, handling, storage, and labeling in an effort to identify sustainable alternatives. We are also actively searching for low-cost ways to reduce harmful emissions.

#### 5. Principles

The baltprom Group conducts business with partners in a sincere, cooperative, and exacting manner. We always behave fairly and in accordance with the letter and spirit of the law. We resolve disputes quickly and in a constructive manner. The harmonious blend of professionalism and enjoyment we employ in our daily work ought to permeate our partnerships as well.

Our most valuable asset is our workforce, in whom we have the utmost confidence and trust. Executives and staff

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communicate in a straightforward and understandable manner and promptly announce any innovations or changes. We regard market changes, unexpected events, conflicts and problems as an opportunity to develop. We respect our employees and help them achieve their training objectives. We promote each person's health and well-being by providing them with above-average and equal working conditions.

In our company, we continue to manage cooperatively. Decisions are made with plenty of time to spare, considering all available data, and executed with purpose. Apart from their general accountability for the organization, our executives are dedicated to guaranteeing that mutually established guidelines are followed and that encouraging assignments and endeavors are effectively completed, despite obstacles and hindrances.

Diversity is important to us because each individual brings fresh perspectives to the table. Wir schätzen Individualität und legen Wert darauf, die verschiedensten Mitarbeiter offen, unbefangen und völlig vorurteilsfrei in unser Team aufzunehmen. We cannot benefit from one another unless we treat one another with mutual respect.

Our ability to tailor our services to each individual business partner's needs sets us apart from the competition.

# 6. Confidential information and conflicts of interest, corruption and actions that hinder competition

It is forbidden for partners and employees to seek personal interests in a commercial partnership or to use their influence to that purpose. Such conflicts of interest must be avoided, or if they do arise, they must notify the baltprom Group right away. We keep sensitive information private and only use it to accomplish our mutual objectives or carry out the services that are specified in our contracts. We always behave justly and lawfully, abstaining from all types of corruption, especially bribery, and abiding by all applicable laws. That goes double for all of our business associates. We follow the rules of competition and antitrust

legislation because we are dedicated to fair competition.

#### 7. Quality

In order to ensure planned availability and proper quality, we, at the baltprom Group, offer our business partners a comprehensive range of products and services for the trade and logistics of biomass, different bulk goods, waste, logs by-products.

Our business partners can operate their own businesses with the desired and required quality and optimally meet their requirements thanks to this quality and the transparency of our services. Establishing and preserving long-term trading relationships is the aim.

The baltprom Group's company culture and effective internal communication are fundamentally based on training and IT-systems. We understand how critical it is to have ongoing training and information exchanges to uphold our high standards of quality and guarantee worker safety. All personnel are empowered and motivated to fulfill the ever-increasing expectations and adjust to the challenges of our contemporary business through focused training. The necessary safety standards, protocols, rules, and possible risks are all covered in staff training.

#### 8. Crisis management

The baltprom Group uses crises as an chance for learning. The business methodically examines the causes and consequences of crises and learns important lessons for upcoming difficulties. At the baltprom Group, creativity and resilience are fostered by a culture of constant improvement and learning from mistakes.

The baltprom Group demonstrates a remarkable capacity for crisis management and rapid crisis recovery.

## 9. Financial fraud, money laundering, and accounting

We follow all tax laws in the nations where we conduct business and maintain the highest standards of care for our books and records. Insider information is handled

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confidentially, and we don't participate in any insider trading. Additionally, the baltprom Group abides by all relevant laws regarding the prevention of financing of terrorism and money laundering.

# 10. Child labor, forced labor, equal opportunity, anti-discrimination, and human rights

Our behavior is guided by universally accepted ethical standards and ideals, including transparency, equality, integrity, honesty, and regard for human dignity.

Employees of baltprom Group must be at least 16 years old.

Young workers of legal working age are protected from employment and work that, by its very nature or the environment in which it is performed, could jeopardize their health, safety, or morality until the age of eighteen.

Discrimination on the basis of race, religion, gender, nationality, ethnicity, age, marital status, physical condition, appearance, sexual orientation, social standing, or any other objectionable distinguishing feature is not tolerated, either directly or indirectly.

We uphold the universally acknowledged rights of human beings and will not permit any behavior that incites or encourages the violation of such rights. We specifically do not accept any form of physical or psychological abuse, obscene or aggressive language, corporal punishment, or sexual harassment, among other cruel or demeaning behaviors. Both our business partners and ourselves forbid the use of child or forced labor in any manner.

The baltprom Group abides by all relevant labor and working time regulations, industry norms, minimum wage and fair pay obligations. We also provide a number of extra advantages to our staff members.

## 11. Sanctions, supply chain, import and export regulation

We guarantee proper customs clearance and abide by all applicable import and export control laws, including any sanctions that may be applicable to our operations. By carefully choosing our business partners before collaborating with them, we make sure of this. We anticipate that our business partners will make sure that the guidelines in this CoC and the requirements of their own supply chain are followed, and they will also demand that their suppliers and service providers do the same.

#### 12. Certification

baltprom Group has a number of certificates that attest to its dedication to quality control, environmental preservation, and adherence to international standards.

Priorities include supporting the circular economy, obtaining wood and other raw materials legally and responsibly, and maintaining open and equitable commercial relationships with all partners. Our authorization and proficiency in the professional transportation and disposal of waste products are certified by the EFB certificate.

Aside from the previously mentioned constant and continual application of environmental management, we also demonstrate our dedication to sustainability by the holding of certifications like FSC®, PEFC, SURE, SBP, and ENplus. We have GMP+ certification for feeding material transportation. We also adhere to the fundamental ideas of recycling and resource reuse.

#### 13. Whistleblowers

There is a whistleblower system in place within the baltprom Group. There are several approaches for reporting wrongdoing. Any employee can get in touch with the internal reporting office or their supervisor. Information can be reported anonymously by email, letter, phone, or in person, and it will be kept private.

Denys Vorotyntsev Managing Director