



## CODE OF ETHICS

SIA ML Dvīņi adhere to the norms defined by ethical principles and acts at all levels and locations honestly and ethically.

ML DVĪŅI has a zero tolerance policy when it comes to unethical business behavior, such as bribery and corruption. We expect that all of our employees, suppliers and partners adhere to similar standards and act ethically. This ML Dvīņi Code of Conduct defines the main principles underlying our business activities.

Every employee of ML Dvīņi who notices or has suspicions relating to violations of the Code of Ethics must immediately notify their direct superior or company Member of the Board.

### 1. SAFE WORKING ENVIRONMENT

ML Dvīņi takes responsibility for its employees and strives to create a safe and healthy working environment for them.

Each individual employee has the responsibility to meet this commitment by following all health and safety procedures and by maintaining a safe and healthy workplace. All workplace accidents, unsafe equipment, unsafe practices and conditions must be reported to direct superior or person responsible for workplace safety. This includes use of alcohol and illegal drugs on the work place.

ML Dvīņi expects all of its employees, especially managerial staff, to be committed to uphold on-the-job safety at all times.

Each manager is responsible for providing employees of ML Dvīņi with appropriate health and safety information and training on how to evacuate from buildings safely, how to correctly handle equipment, tools and chemical substances in workplace.

### 2. FAIR WORKING CONDITIONS

ML Dvīņi ensures fair payment and reasonable working hours for its employees, and condemns every form of forced or child labour.

ML Dvīņi honours the privacy of it's employees and protects relevant information.

ML Dvīņi does not allow discrimination against employees, all employees have the right for fair and equal treatment. Employees who have same qualification, experience and work results must receive equal payment for equal amount of work.

Number of working hours must correspond to applicable laws. Regular working week does not exceed the norms derived from the laws of.

### **3. AVOIDING CONFLICT OF INTEREST**

ML Dvīṇi expects from its employees and to behave in such a way, that does not harm the interests and reputation of the company.

Outside work must not involve an ML Dvīṇi competitor nor should it involve the use of ML Dvīṇi equipment or proprietary information such as computers, software, customer information etc.

It is crucial that the selection of partners is based on objective criteria including integrity, quality and performance, and not personal interests.

### **4. DATA PROTECTION**

ML Dvīṇi shall process personal data only to the extent permitted by the applicable laws, in compliance with the principles of lawfulness and good faith.

ML Dvīṇi shall ensure that personal data is processed with appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage, through appropriate technical or organizational measures.

### **5. PROTECTING COMPANY ASSETS AND INFORMATION**

All employees are required to protect ML Dvīṇi assets and ensure their efficient use. They are to be used for legitimate purposes and for ML Dvīṇi business only.

It is forbidden to download or distribute any material that is illegal, offensive or could reflect negatively on ML Dvīṇi reputation. We should also exercise discretion and diligence when drafting e-mails to ensure that our communication is professional and appropriate.

The success of ML Dvīṇi as a business is based on the knowledge of its employees. Employees must ensure that the operational and business secrets of ML Dvīṇi as well as its business partners do not become known outside of the company. It is forbidden to publish operational or business secrets without permission, to pass them to third parties, or to utilise them for one's own purposes without permission.

### **6. PROTECTING THE ENVIRONMENT**

ML Dvīṇi considers itself committed to the sustainable use of natural resources. It is therefore natural that ML Dvīṇi upholds the legal regulations that apply to the protection of the environment.

At ML Dvīṇi, we are committed to ensuring that the impact of our daily activities is minimal and we will continue to monitor our activities in order to ensure continuous improvement.

ML Dvīṇi is committed to minimizing the environmental impact in all its activities, and will comply with the laws and regulations for environmental protection in all countries we operate in. Such commitment and compliance with it is required from all employees of ML Dvīṇi. ML Dvīṇi will continuously evaluate the environmental aspects of its activities to deliver services with no undue environmental impact.

## 7. STABLE AND SUSTAINABLE FORESTRY

ML Dvīṇi shall observe the forest certification principles of the FSC (Forest Stewardship Council), and SPB (Sustainable Biomass Programme) with long-term focus on stable production of timber, environmental protection, and social responsibility in accordance with social, health, and labour safety requirements. ML Dvīṇi business partners who sell or supply suitable goods shall comply with the corresponding certification requirements.

## 8. HANDLING THE MEDIA

Providing the public, including the media, with clear, dialogue-oriented and consistent information strengthens the global image of ML Dvīṇi. Official statements, especially to the media, may therefore only be made after consultation with the Member of the Board.

## 9. ANTI-CORRUPTION PRINCIPLES

### 9.1 ANTI-BRIBERY POLICY

**Bribery means:** paying money, promising to pay money, authorizing to pay money, or offering or promising anything of value to a person in a position of trust in order to unduly influence the judgment or conduct of that person.

ML Dvīṇi considers any form of bribery, extortion and corruption unacceptable.

ML Dvīṇi does not engage in the bribery of any public official, political candidate, party, party official, private sector employee or individual. Even where ML Dvīṇi is faced with extortion, in the form of a threat of financial harm or loss of business, bribery of any kind is not allowed. There are no exceptions for small amounts or the so called “facilitation-“ or “grease-“ payments. Furthermore, ML Dvīṇi also prohibits its employees from accepting or soliciting bribes or any other undue advantages.

### 9.2 CHARITABLE CONTRIBUTION POLICY

**Charitable contributions** are donations given to a reputable non-profit institution or organization, for example in the field of disaster relief, without the intent to achieve a business advantage other than goodwill and reputational benefits. Charitable contributions can be financial or in kind (e.g. services) and are often provided in the framework of a company’s corporate social responsibility activities.

ML Dvīṇi allows for charitable contributions only under restricted circumstances:

They are not made in order to secure a business deal;

They are made for a legitimate purpose;

They are given to a recognized and reputable charitable organization, not to an individual. In exceptional cases, with approval from ML Dvīṇi Member of the Board, charitable contributions may be made to public or government institutions (e.g. hospitals). Charitable contributions to public or government institutions must not be made to gain an improper business advantage;

The recipient of the charitable contribution has no business or private ties whatsoever with ML Dvīṇi and its employees;

The amount of the contribution is reasonable;

### **9.3 SPONSORSHIP POLICY**

**Sponsorships** are payments to an organization or an individual, made in cash or in kind. The purpose is to link ML Dvīṇi to a popular event (e.g. sports activity, concert, festival etc), or to a well-known person (e.g. a singer, sportsman, etc). The benefit to ML Dvīṇi is association of its name with the well-known and famous, an association which usually results in more publicity and a stronger brand. The business relationship between the sponsor and the receiving party as well as the commercial advantage for the sponsor distinguishes sponsorship from charitable contributions.

ML Dvīṇi allows for sponsorships only under restricted circumstances:

- The sponsored party can only be a recognized and reputable organization or individual;
- The sponsorship payments are made for the benefit of ML Dvīṇi and for a legitimate purpose;
- The sponsored party has no private ties with ML Dvīṇi employees, such as family relationship;
- The sponsorship payment is transparently documented in an agreement with the organization;
- The contribution can be financial or in-kind;
- The amount is reasonable and inline with local practices;
- Pre-approval by the company member of the boards.

### **9.4 POLITICAL CONTRIBUTION POLICY**

**A political contribution** (also referred to as political donation) is any contribution made to a politician or a political campaign or a political party. This includes payments made directly or indirectly (i.e. through an acquaintance or any other intermediary), and contributions in cash or in kind.

ML Dvīṇi employees are prohibited from making political contributions in any form for or on behalf of ML Dvīṇi. Personal contributions by ML Dvīṇi employees may be made in their own capacity, if they are not made with the intention or result of directly or indirectly benefiting ML Dvīṇi and if no ML Dvīṇi funds, resources, time or assets are involved.

Furthermore, ML Dvīṇi employees must not use third parties (i.e. agents, subcontractors, consultants or other intermediaries) to make political contributions on ML Dvīṇi's behalf.

## **10. APPLICATIONS OF THE CODE OF ETHICS**

ML dvīṇi employees shall organise their work and act in accordance with the principles provided for in this Code of Ethics, the internal guidelines and procedures of the company, as well as conventional norms of conduct and morality.

ML Dvīņi business partners shall follow the principles provided for in this Code of Ethics, as well as conventional norms of conduct and morality, and ensure that their subcontractors also follow these norms.

## 11. VIOLATIONS

Non-adherence to the Code of Ethics is followed by investigation of alleged violation, which can result in disciplinary measures as specified by law.

Every ML Dvīņi employee must immediately notify their direct superior of the violation of the Code of Ethics.

If you have information of a violation, please report to the ML Dvīņi commercial director, Māris Bērtulsons, at [maris@ml-dvini.lv](mailto:maris@ml-dvini.lv) or by phone +371 29130010.