Approved by:

CEO of the company Linas Karzinauskas
Dated 15-01-2022

KG CONSTRUCTIONS GROUP, UAB WHISTLERBLOWER POLICY

I. PURPOSE

1.1 KG Constructions Group (hereinafter – **the Company/the Group**) is committed to high standards of ethical and legal business conduct. In line with this commitment, KG Constructions Group has implemented this Whistleblower Policy (hereinafter - **the Whistleblower Policy**) for the purpose of:

- providing a smooth and swift mechanism for employees, board members and other persons affiliated with the Company to safely report illegal activities or serious misconduct,
- supporting compliance with relevant laws and code of conduct applicable to the Company,
- preventing or detecting illegal and/or serious misconduct, and
- setting up a general procedure for handling such reports and suspicions.

1.2 This Whistleblower Policy sets out the guidelines on how to make reports through the whistleblower system as well as the procedure for handling reports received according to this Whistleblower Policy.

1.3 KG Constructions Group, UAB operates from Lithuania and is a holding company of the following companies: 1) KG Energija, UAB, 2) KG TRANSPORTAS, UAB; 3) KG Constructions, UAB; 4) Lignas, UAB; 5) KG Service, UAB; 6) KGC Sweden AB; 7) KGC Denmark, ApS; 8) KGC Facades UK Ltd; 9) KGC Switzerland AG; 10) Lignas Sweden AB (hereinafter – the **Group**). The Whistleblower can choose if he/she wants to report the possible violation to the employer only by address or email, to the parent company KG Constructions Group by address Pramonės st. 15, Parapijoniškių k., or email report@kgcgroup.com or via internal channel.

1.4 The main general activities of the Group are aluminium and timber unitized curtain walling design and engineering, production, delivery and installation for residential, commercial and public buildings.

1.5 The Group operates in Lithuania, Latvia, Finland, Sweden, Denmark, Norway, the United Kingdom and Switzerland. One-off projects are also being launched in other European countries (Poland, Portugal, etc.).

II. SCOPE OF THE WHISTLEBLOWER POLICY

2.1. This Whistleblower Policy applies for all Group companies, specified in Section 1.3. The Group companies, which are established outside the Republic of Lithuania, may hold their own Whistleblower and policies, as required under local law.

2.2. Not all concerns may be reported through the Whistleblower Policy. The Whistleblower Policy only applies to material and serious illegal activities and violations on public interest. The reports that may be made according to this Whistleblower Policy (collectively hereinafter referred to as Suspected Misconduct) include the following:

1) Danger to public safety or health, life or health of a person;
2) danger to the environment;
3) obstruction or unlawful interference with the investigation or administration of justice by law enforcement authorities;
4) financing of illegal activities;
5) illegal or non-transparent use of public funds or property;
6) illegally acquired property;
7) concealment of the consequences of the committed violation, obstruction of determining the extent of the consequences;
8) other violations, because of which public interest is violated.

2.3. Concerns regarding other issues, such as bullying, cooperation problems, incompetence, absence, violations of internal policies drugs and alcohol, usage of internet and emails, internal regulations on work organization etc., are not covered by this Whistleblower Policy. Such concerns should instead be raised directly with the relevant manager. In any case, notification of internal violations through the internal channel is possible. Only then does the Company investigate such a report as a possible breach of duty / internal order.

2.4. Reports according to the Whistleblower Policy may be submitted by any person affiliated with KG Constructions Group. Including employees, members of the management, shareholders, external consultants, etc.

2.5. Reports made according to the Whistleblower Policy must concern at least one of the following groups:

2.5.1. Employees of KG Constructions Group companies;
2.5.2. Members of management of KG Constructions Group companies;
2.5.3. Shareholders of KG Constructions Group companies;
2.5.4. External consultants;
2.5.5. Other groups of persons affiliated with the Company and Group companies, etc.

III. PROCEDURE

2.6. Under the Whistleblower Policy, Company's and Group companies' employee, management member or other person affiliated with the Company, may submit a concern a complaint (hereinafter – the Reported violation) regarding Suspected Misconduct to internal auditing by a member of HR team (hereinafter – Internal Audit).

2.7. The Company has adopted the following rules and procedures to facilitate the

submission of Reported Violation under the Whistleblower Policy.

2.8. The submission

2.8.1. The Whistleblower should submit the Reported Violation directly to Internal Audit by using the Company's Whistleblower Reporting Form. The Whistleblower shall describe in this form: (i) the nature of the incident; (ii) the time and place of the incident; (iii) persons involved in the incident; (iv) other facts related with the incident; (v) contact details (not necessary). The Company's Whistleblower Reporting Form is available https://kgcgroup.com/home/whistleblowing/:

2.8.2. Reported Violations can be submitted in the following ways:

i) Via ordinary mail which shall be sealed envelope to:
Pramones g. 15, Parapijoniskes, LT-13241 Vilniaus r.;

ii) By e-mail to: report@kgcgroup.com , or
Via internal channel: https://kgcgroup.com/home/whistleblowing/.

The subject field should be named "Submitted pursuant to KG Constructions Group Policy" Whistleblower Policy" *(English)*.

2.8.3. Whereas the Company encourages any Whistleblower to state the name and contact details in relation to submitting Reported Violation according to this Whistleblower Policy, the Whistleblower may choose to remain anonymous if he/she prefers so. In order to remain anonymous, the Whistleblower must submit the Reported Violation by ordinary mail only (e-mail would compromise anonymity) and should not reveal his/her identity or any personally identifiable information (e. g. email, phone number, etc.) when submitting the Reported Violation. If the notifier wishes to be recognized as a notifier, he / she must indicate this in the notification.

2.8.4. Whether the Reported Violation is submitted via ordinary mail or email all necessary or available documentation supporting the Reported Violation must be enclosed (if any). Proper documentation is especially important in relation to Reported Violations submitted anonymously.

2.9. Screening

2.9.1. When a notice of violation falling within the scope of this Policy is received, the Company shall in all cases provide the received information to the competent entity no later than within 2 (two) business days. If the notifier wishes to be recognized as a notifier, the Company shall not examine such notices in accordance with the procedure provided for in this Policy and shall immediately forward them to the competent entity, only examine the possible breach of duty / internal order. If the notifier does not wish to be recognized as the notifier, the Company shall send the received information to the competent entity within the term specified in this clause and shall conduct an internal investigation in accordance with the procedure established in this Policy.

2.10. Initiating the Investigation

2.10.1. If the Reported Violation falls within the scope of this Whistleblower Policy and is not obviously without basis, the Internal Audit will inform the respective CEO of the specific

company of the Group.

If the Reported Violation concerns the respective CEO of any of the Group companies, the Internal Audit will inform the shareholder and may include external advisors without including the respective CEO.

2.11. The Investigation Team

Internal Audit will along with the respective CEO (hereinafter - the Investigation Team) upon receipt ofthe Reported Violation evaluate the need for further investigation and the form hereof.

In further investigation is needed the Investigation Team (which includes at least an in-house lawyer (if there is one) and the HR manager) will involve relevant external advisors (e. g. a law firm, an accountancy firm, a consulting firm, etc.). The Investigation Team in each case will evaluate if (and what kind of) external advisors will be relevant to include in relation to the specific Reported Violation. If the Reported Violation concerns a person from the Investigation Team, the Investigation Team may choose to include relevant persons from the Group to participate in the investigation, if necessary.

In case the Reported Violation concerns the Investigation Team or the respective CEO, the investigation will be determined upon by the shareholder. If the Reported Violation concerns the shareholders of the respective Company and/or board members, the respective CEO and the remaining board members/shareholders will determine further investigation.

2.12. The Investigation

2.12.1. The Investigation Team will investigate the Reported Violation in order to establish whether the Suspected Misconduct has actually taken place, and in order to learn the details and the nature of the Suspected Misconduct. The Investigation Team may come to the decision that the Reported Violation does not take place for investigation if: (i) information provided is clearly false; (ii) there is an ongoing investigation on the same matter; (iii) information provided does not fit the grounds of Whistleblower Policy or Whistleblower legal acts, etc.

2.12.2. The investigations of any Reported Violation will be conducted as discretely as possible and in a confidential manner to the extent possible for making a thorough and complete investigation.

2.12.3. The Investigation Team may enlist Company's employees and/or other external advisors, as appropriate, to conduct the investigation of Reported Violations. Such involvement of employees and/or advisors will only take place to the extent necessary.

2.12.4. Any Reported Violation and the subsequent investigation are considered strictly confidential and will be handled strictly confidential by the Investigation Team and any other person, body or company involved in the handling of the Reported Violation. All reasonable efforts will be made in order to protect the confidentiality of the Whistleblowerand the person(s) concerned in the Reported Violation.

2.1.3. Finalizing the investigation

2.1.3.1. Once all aspects of the Reported Violation have been investigated and considered the Investigation Team will summarize the result of the investigation.

2.1.4. Decision

2.1.4.1. Based on the results of the investigation the Investigation Team will make a joint decision. The decision may contain that the notification is groundless and that the decision is related to the appropriate disciplinary sanctions to be taken towards the person(s) involved in theSuspected Misconduct internally.

2.1.4.2. The Investigation Team also informs the Whistleblower about the decision if Whistleblower's contacts are provided within 2 (two) business days after the decision.

2.1.5. Sanction

2.1.5.1. The Investigation Team will, based on the results of the investigation, determine the sanction and any corrective actions to be taken as a consequence of the Reported Violation.

2.1.5.2. Sanctions to be taken as a consequence of a Suspected Misconduct may for the employees of the Company be disciplinary sanctions, including written warnings, termination of employment, and in very gross circumstances summary dismissal. For other persons affiliated with KG Constructions Group the sanction will depend on the nature of theconnection between KG Constructions Group and the said person and the severity of the Suspected Misconduct.

2.1.5.3. If the Whistleblower has chosen not to remain anonymous the Whistleblower may, if deemed necessary by the Investigation Team, receive a reply to whether his/her submission of a Suspected Misconduct has led to an investigation.

2.1.5.4. If sanction concerns a person in one of the Group companies, the Investigation Team may transfer relevant data to such person's superior manager.

IV. PERSONAL DATA

2.1.6. In relation to this Whistleblower Policy, the Company may receive information on both the Whistleblower and persons involved in the Suspected Misconduct. Such information may contain sensitive information on suspected criminal or administrative behavior and other personal matters.

2.1.7. All information received according to the Whistleblower Policy will be handled in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and in accordance with the Directive (EU) 2019/1937 of the European Parliament and of the Council on the protectionwho report breahes of Union law on 23 October, 2019.

V. DELETION

2.1.8. Generally, all information received according to the Whistleblower Policy will only be retained for as long as it is necessary. The Company will store the information according to the guidelines below and according to the legal acts on archiving the documents and legal provision on Whistleblower protection:

2.1.8.1. Reported Violations without basis or outside the scope of the Whistleblower Policy:

(i) If a Reported Violation submitted under the Whistleblower Policy in the initial screening process is considered to be obviously without basis or outside the scope of the Whistleblower Policy, the Reported Violation will not be considered or investigated further. The Internal Audit will in such case annihilate the Reported Violation and the information received in this regard immediately and will, if possible, encourage the Whistleblower to raise the concern directly with the relevant manager or in another appropriate way.

2.1.8.2. Investigated Reported Violations

(i) If the investigation demonstrates that the Reported Violation is without basis, all information received by the Investigation Team and otherwise generated through their investigations will be archived.

(ii) In such a case, all information obtained under this Infringement Reporting Policy, including information obtained by the Investigation Team in the course of an investigation, shall be retained until the competent authorities have completed their investigations, provided that the competent authorities continue to examine the information received. The information will be archived once the authority has closed its investigation and examined the case.

(iii) When the case concerns an employee, the outcome of the investigation may also result in disciplinary action, including written notice, termination of employment, and so on. In such cases, the information gathered during the investigation may be retained for the duration of the investigation into the alleged breach of duty. In addition, the information may also be stored in the employee's file. The information stored in the employee's file will be stored for at least 3 years after the termination of the employment relationship.

The Whistleblower is any case shall not be subject to any measures adversely affecting the person from the date of the provision of such information: dismissal because of the notification, harassment, discrimination, threat of retaliation, restriction of career opportunities to reduce wages, change working hours, raise doubts about competence, pass on negative information about it to third parties or apply any other negative measures.

VI. SAFEGUARDS

2.1.9. Company's aim is to establish a safe environment for persons affiliated with KG Constructions Group to raise concerns regarding issues of material importance for KG Constructions Group. Thus, retaliation or harassment of the Whistleblowers for reporting concerns in good faith under the Whistleblower Policy will not be tolerated by KG Constructions Group.

2.1.10. KG Constructions Group encourages individuals to include their names in the Whistleblower Reporting Form when filing a Suspected Misconduct according to this Whistleblower Policy because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Furthermore, it is vital that the provide as many details about the Suspected Misconduct as possible in order to help facilitate the assessment of the same and to improve the efficiency and effectiveness of the corresponding investigation.

2.1.11. Whistleblower may, however, elect to remain anonymous according to Para 2.8.4.

2.1.12. Reported Violations filed anonymously will be investigated appropriately, but

consideration will be given to:

i. The seriousness of the Suspected Misconduct; and
ii. The likelihood of confirming the allegation from attributable sources.

2.1.13. Even where the Whistleblower elects to include his/her name (not remain anonymous), his/her confidentiality will still be appropriately safeguarded and every reasonable effort will be made to preserve it.

2.1.14. All reports submitted according to the Whistleblower Policy will be handled confidentially and with discretion both by the Investigation Team and any other person, body or company involved in the whistleblower reporting process.

It is also essential for KG Construction Group to protect and to avoid damage to the reputation of any person who are the subject of a Reported Violation. For this reason, the Investigation Team will conduct their investigations of any Reported Violation as discretely as possible and in a confidential manner to the extent possible for making a thoroughand complete investigation.

VII. FINAL PROVISIONS

19. This policy and procedures can be reviewed at any time and changed. If the changes are made, employees to whom this policy is applicable, shall be acknowledged with it again.