

RESPONSIBLE PROCUREMENT POLICY

Viciunai Group is a producer of products from surimi, fish, seafood, salads, flour-based products in Lithuania and other countries worldwide, as well as trading and logistics companies operating across Europe, North America and Canada.

The purpose of this policy is to establish the principles and guidelines followed by the Viciunai Group in conducting procurement activities, thereby contributing to responsible business practices, environmental objectives, and the development of a sustainable supply chain.

This policy is an integral part of the Viciunai Group vision and values, as well as its policies on Employee Health and Safety, Human Rights and Social Responsibility, Environment, Transparency and Business Ethics, and Information Security. It applies to all employees engaged in work relationships within the Viciunai Group companies, as well as in the company's interactions with third parties, including clients, suppliers, partners, and governmental or municipal institutions and agencies.

The policy is publicly available to all employees, clients, suppliers, business partners, the public, and other stakeholders.

In the procurement process for products and services, the Viciunai Group adheres to the following principles:

Transparency and Integrity

- All procurement processes are carried out transparently, in compliance with applicable legislation and internal procedures, avoiding conflicts of interest and ensuring fair competition for all suppliers.
- Any form of bribery or corruption is strictly prohibited.
- We cooperate only with reliable business partners who are not subject to international sanctions or restrictions and who apply anti-corruption measures to ensure transparency in their operations.

Quality and Food Safety

- We purchase high-quality raw materials and products. Priority is given to raw materials and products certified under GFSI-recognised certification schemes.
- We collaborate with suppliers who ensure full product traceability, prevention of food fraud, and food defence throughout the entire supply chain.
- All purchased raw materials, products, and services must comply with national and international food safety requirements.

Environmental Protection and Sustainability

We seek cooperation with suppliers who:

- apply environmentally friendly production processes and circular economy principles;
- implement measures to control air and water pollution and ensure responsible water use;
- contribute to the preservation of biodiversity and avoid negative impacts on ecosystems;
- reduce waste generation and promote recycling;
- monitor their CO₂ footprint and have registered climate change mitigation targets with the SBTi platform.

Social responsibility

We cooperate with suppliers who:

- respect human rights, ensure safe and decent working conditions, and comply with local and international labour laws;
- ensure employee health and safety, fair working hours, and adequate rest periods;
- pay fair wages that comply with legal requirements and support a decent standard of living;
- We do not tolerate child labour, forced labour, discrimination, or any form of human rights violations.

Support for Local Communities

- Wherever possible, we seek to cooperate with local suppliers and partners, provided that their products or services meet our requirements in terms of food safety, pricing, quality, environmental protection, responsible business conduct, and sustainability.

Supplier Selection and Evaluation

- When selecting suppliers, we assess not only price but also quality, environmental performance, social responsibility, and business transparency. Priority is given to suppliers certified according to GFSI-recognised food safety standards, as well as those demonstrating strong governance, environmental, and social responsibility practices.
- We conduct periodic supplier risk assessments. Based on the assessed level of risk, decisions are made regarding additional compliance assurance measures.
- Suppliers formally commit in writing to comply with the Viciunai Group Supplier Code of Conduct, which reflects the principles set out in this Policy.

POLICY IMPLEMENTATION, MONITORING AND CONTROL

Viciunai Group management is committed to allocating necessary resources to implement this Policy and to continuously monitor compliance with its commitments in the daily operations.

All employees involved in the procurement process are familiar with this Policy and adhere to its statements when carrying out procurement activities. Compliance with the policy statements is continuously monitored through the analysis of operational performance indicators.

To prevent breaches of this Policy, ensure transparency, and maintain trust, a Whistleblowing Line has been established, accessible by phone at +37052103300 or by email at transparency@vici.eu, for reporting any Policy violations. The management of the Viciunai Group guarantees the confidentiality of reporting individuals and protection against any potential adverse consequences.

This Policy is reviewed considering changes in legislation, international best practices, and the company's strategic objectives, but at least once a year during the management review. The Policy is approved by the Management Board.