

GND Advisory
EQUAL OPPORTUNITY POLICY



Approved by:	GND Advisory Management
Approved on:	March 2022
References to external policies:	The EU Gender Equality Strategy 2020-2025 United Nations' Sustainable Development Goal (SDG) 5 The Labour Code of the Republic of Lithuania The Law on Equal Treatment of the Republic of Lithuania The Law on Equal Opportunities for Women and Men of the Republic of Lithuania
References to internal policies:	Business Code of Conduct and Ethics

Contents

- 1. The Firm3
- 2. General Provisions3
- 3. Definitions.....3
- 4. Fundamental Principles4
- 5. Working Conditions, Training, Remuneration and Promotion.....4
- 6. Protection of Employees against Discrimination and Infringement of Equal Opportunities5
- 7. Periodic Policy Assessment.....5
- 8. Approval.....6

1. The Firm

GND Advisory (hereinafter referred to as the Company) is an autonomous advisory firm registered in the Republic of Lithuania. The records of the Company are kept at the State Enterprise Centre of Registers.¹ GND Advisory and each of its majority-owned subsidiaries and affiliated entities (together with the Company hereinafter referred to as GND) conducts its operations in compliance with the EU and Lithuanian Law, Regulations, and its internal Code of Conduct.

2. General Provisions

- 2.1. GND is guided by the principles of gender equality and non-discrimination. GND ensures equal treatment of all employees of GND and persons applying for employment both before and after the conclusion of the employment contract, regardless of their gender, sex, race, nationality, language, origin, social status, age, sexual orientation, disability, ethnicity, membership of a political party or association, religion, faith, belief or opinion, or intention to have a child (children). The Company has approved this Equal Opportunities Policy (hereinafter referred to as the Policy) establishing the main principles of equal opportunities applied in GND.
- 2.2. The principles of gender equality and non-discrimination are respected by GND in all areas related to employment:
 - during the recruitment process;
 - providing opportunities for further training or retraining;
 - when deciding on promotion or transfer;
 - providing the opportunity to gain work experience;
 - in the payment of wages;
 - by providing additional leave and other benefits;
 - adjusting the working time arrangements;
 - evaluation of work performed;
 - the imposition of sanctions or dismissal;
 - upon termination of the employment contract or at the end of it.
- 2.3. The Policy is an internal document of GND, binding on all employees and is made available on the Intranet and public website. GND introduces all employees to the Policy by email during the onboarding process. Employees must comply with the obligations and principles set out in the Policy when performing their work functions.

3. Definitions

- 3.1. **Discrimination** - direct and/or indirect discrimination, harassment, instruction to discriminate on the grounds of gender, sex, race, nationality, language, origin, social status, religion, faith, belief or opinion, age, sexual orientation, disability, ethnicity, membership of a political party or association, or intention to have a child (children).
- 3.2. **Equal opportunities** - implementation of human rights enshrined in international human and civil rights documents and laws of the Republic of Lithuania, equal treatment of employees regardless of their gender, sex, race, nationality, language, origin, social status, religion, faith, belief or opinion, age, sexual orientation, disability, ethnicity, membership of a political party or association, or intention to have a child (children).
- 3.3. **Violation of equal opportunities** - direct and indirect discrimination, instruction to discriminate, harassment.
- 3.4. **Indirect discrimination** - neutral action (inaction), evaluation criteria, which are formally the same, but their application may cause violation of equal opportunities.

¹ State Enterprise Centre of Registers. https://www.registrucentras.lt/jar/index_en.php

- 3.5. **Harassment** means any unwanted systematic, degrading behaviour insulting human dignity, creating an intimidating environment or causing unpleasant consequences.
- 3.6. **Sexual harassment** means any unwanted acts of a sexual nature, expressed through verbal, oral, written or physical action, where such conduct has the purpose or effect of violating the dignity of the individual, in particular by creating an intimidating, hostile, degrading or offensive environment.
- 3.7. **Social status** - education, qualification or training and studies in research and study institutions acquired by a natural person, possessions, income, the need for state support established by legal acts and / or other factors related to the person's financial (economic) situation.
- 3.8. **Direct discrimination** - treatment of a person on the grounds of gender, sex, race, nationality, language, origin, social status, religion, faith, belief or opinion, age, sexual orientation, disability, ethnicity, membership of a political party or association, or intention to have a child (children) less favourably than in comparable circumstances is, has been or would apply to another person, except as provided by law.
- 3.9. **Instruction to discriminate** - is an instruction to an employee to treat another employee or a candidate less favourably because of their gender, sex, race, nationality, language, origin, social status, religion, faith, belief or opinion, age, sexual orientation, disability, ethnicity, membership of a political party or association, or intention to have a child (children).

4. Fundamental Principles

- 4.1. GND does not tolerate forms of direct or indirect discrimination, as well as instructions to discriminate on the basis of gender, sex, race, nationality, language, origin, social status, religion, faith, belief or opinion, age, sexual orientation, disability, ethnicity, membership of a political party or association, or intention to have a child (children).
- 4.2. GND does not tolerate any form of harassment, psychological violence, bullying, or use of occupied position.
- 4.3. GND helps employees reconcile work and family responsibilities. Employees with family responsibilities or caring for a close relative are given the option of flexible working hours.
- 4.4. GND aims to adapt working conditions for employees with disabilities so that everyone has equal opportunities to work and fulfil their potential. Decisions on the adaptation of working conditions are taken on an individual basis, taking into account the needs of the employee, the nature and functions of the work and the costs necessary to adapt the conditions.
- 4.5. Decisions relating to recruitment, training, compensation, remuneration and other benefits, promotion, leave and conduct at work shall be based on objective criteria and factors and shall be non-discriminatory.

5. Working Conditions, Training, Remuneration and Promotion

- 5.1. GND undertakes to create equal working conditions for all employees (taking into account the specifics of the employee's work), as well as opportunities to improve qualifications, seek professional development, retrain, gain practical work experience, as well as provide equal benefits to employees.
- 5.2. The salaries for specific positions are determined in GND's remuneration system. The specific amount of remuneration for a potential or current employee shall be determined on the basis of objective criteria relating to the employee's abilities, competence, qualifications, experience and knowledge.
- 5.3. All employees are paid the same pay for the same or equivalent work.
- 5.4. Bonuses, benefits and other incentives for employees are applied on the basis of clear criteria known to employees. If the procedure for the payment of certain benefits or incentives is not discussed or approved by the Company's management, GND follows the general principles of equal opportunities, fairness and reasonableness in granting such payments or incentives.

- 5.5. The opportunities for promotion of an employee in GND depend only on the employee's competence, qualification, available experience and knowledge, achieved work results, quality of work and GND's ability to give a higher position to the employee.
- 5.6. Employee evaluations in GND are organized and performed in accordance with the specified procedure, criteria or principles according to which the evaluation of the results and improvement achieved by the employees is performed.

6. Protection of Employees against Discrimination and Infringement of Equal Opportunities

- 6.1. All employees of GND (or candidates for vacancies) who believe that they have not been provided with equal opportunities or have been in a situation of violation of equal opportunities have the right to file a complaint with the Company.
- 6.2. An employee may contact the Company management to report discrimination or a violation of equal opportunities. The confidentiality of such an employee's report (complaint) must be guaranteed.
- 6.3. Any employee who becomes aware of or receives information about a possible violation of equal opportunities may report it to the Company's management.
- 6.4. Upon receipt of the information or notification of discrimination and violation of equal opportunities, the responsible employee of the Company shall, within the shortest possible time, but not later than within 10 working days from the receipt of the information investigate the case and ensure a safe working environment for the complainant during the investigation of the complaint. Any harassment or hostile treatment against an employee or candidate for a vacancy who has complained of discrimination and / or violation of equal opportunities is prohibited and is considered a serious breach of duty.
- 6.5. The Company ensures that the employee is protected from hostile behaviour or negative consequences if the employee complains about discrimination or violation of equal opportunities, or participates in a lawsuit against the Company, its employee or any other person related to the Company.
- 6.6. All complaints shall be dealt with in good faith and in accordance with the principles of objectivity and impartiality. The parties to the complaint must provide explanations of the circumstances of the case to the responsible employee of the Company. The privacy and confidentiality of the parties to the complaint and of third parties involved in the complaint shall be protected during the handling of the complaint.
- 6.7. If necessary, the staff member complained of may be removed from office for up to 30 calendar days in the form of remuneration or, if they so agrees, transferred to another job. If the complaint is found to be well-founded, the offender may be subject to the following sanctions, depending on the seriousness of the violation: warning, termination of the employment contract.
- 6.8. An employee or a candidate for a vacancy may file a complaint regarding the violation of equal opportunities with the Office of the Equal Opportunities Ombudsman or another competent authority. The Company undertakes to cooperate with the investigating authority.
- 6.9. Where it emerges that a complaint or report of a breach of equal opportunities was made in order to damage another employee's reputation, such conduct is considered to be a serious and intolerable breach of duty which may lead to warning, termination of the employment contract.

7. Periodic Policy Assessment

- 7.1. Every employee of the Company has the right to express comments, provide feedback on the Policy, its effectiveness and to submit proposals for changes or additions to the Policy. Proposals are submitted in person to the management of the Company.

7.2. The effectiveness of the Policy shall be assessed and possible amendments and/or additions shall be considered at least quarterly.

8. Approval

I have read, accept and fully understand the responsibilities detailed under this Equal Opportunity Policy.

I approve this Policy.

Donatas DITKUS
GND Advisory Representative
