

EMPLOYEES CODE OF CONDUCT OF BALTIC CLASSIFIEDS GROUP PLC

GENERAL PROVISIONS

The Employees Code of Conduct of Baltic Classifieds Group (hereinafter referred to as **Employees Code of Conduct**) shall establish the general requirements and principles, that encourage the employees of Baltic Classifieds Group companies in Lithuania, Latvia and Estonia, that is, UAB "Diginet LTU", Antler Group, UAB, Baltic Classifieds Group OÜ, Kinnisvaraportal OÜ, AllePal OÜ, VIN Solutions OÜ, and City24 SIA, Baltic Classifieds Group PLC and BCG HoldCo Limited (hereinafter referred to as the "**Companies**" and each the "**Company**"), to act in accordance with the highest ethical standards. Employees Code of Conduct shall be applicable to all employees of the Company.

Although this document cannot address every situation that may arise, it provides a framework for the business conduct expected of everyone who works at the Company. It is intended not only to meet, but also to exceed, minimum legal requirements. Employees are expected to conduct every aspect of the Company's business according to the laws and regulations that govern us and with the highest ethical standards.

COMPLIANCE WITH APPLICABLE LAWS

It is the Company's policy to obey all laws and regulations applicable to the Company's activities. An employee should not take any action on behalf of the Company with knowledge or suspicion that it may violate any law or regulation.

OBSERVANCE OF HIGH ETHICAL STANDARDS

All employees are expected to exercise the highest standards of ethical behaviour and good judgement when conducting business.

Examples include, but are not limited to:

Workplace environment

In BCG we value the safe environment for all of our colleagues and visitors. Therefore, all members of the workforce are required to take reasonable care for the health and safety of themselves and others and co-operate with Company instructions in relation to health and safety.

Members of the workforce are expected to arrive at and attend work fit to carry out their duties safely without any limitations due to the use or after effects of alcohol or drugs, including controlled drugs, psychoactive substances, or the misuse of prescribed or over-the-counter medication.

Conflicts of Interest

Employees should not put themselves in a position where personal interests or relationships could conflict or appear to conflict with the best interests of the Company. This means employees should avoid doing anything that would compromise or appear to compromise the Company or themselves.

Employees are expected to avoid any investment, interest, association, or relationship that might interfere with their ability to make independent judgments or decisions on behalf of the Company.

Any potential conflict of interest must be declared to the Company.

Inside Information

Unauthorised disclosure of the Company's trade secrets or confidential information is prohibited. The specific details are outlined in BCG Share Dealing Code. Any questions regarding what is considered confidential, trade secrets, or inside information should be referred to the employee's supervisor or a person responsible for the Company's legal matters.

Record Keeping and Data Integrity

The Company records are relied upon to produce reports to the Company's management, shareholders, creditors, governmental entities, regulatory agencies and others. All transactions must be recorded with care and honesty and must be supported by accurate documentation in sufficient detail to permit their review and audit. This includes not only financial and business transactions, but all organisation records, in whatever form recorded (e.g. written, electronic or otherwise).

Misappropriation and/or improper reporting of funds, other organisation assets or activities, falsification of data and intentional disclosure of confidential information represent unethical activities and are strictly prohibited.

Human rights

Human rights are paramount in the Baltic Classifieds Group, guided by the principles outlined in the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. In BCG, we are committed to upholding and promoting these principles in all aspects of our operations. Every employee is bound by these internationally recognized standards, ensuring compliance with laws and regulations that safeguard the dignity, equality, and freedoms of individuals irrespective of their background or characteristics. Employees are required to create and maintain a work environment that is free from discrimination, harassment, and exploitation, in line with these established principles. By integrating these requirements into our code of conduct, we demonstrate our commitment to upholding human rights both internally and externally, thereby contributing to a just and equitable society.

Unlawful and Questionable Payments

Making unlawful or improper payments, offering of expensive gifts, bribes or any other kind of payment to customers, suppliers, government officials or others is prohibited. The Company's services are sold on the merits of quality and price, and the Company does not want business obtained through deviation from these standards. For more guidance please check the BCG Anti-Bribery and Anti-Corruption Policy.

Sustainability

Sustainability is a fundamental principle for the Company. Employees are expected to promote sustainability in all their activities. This includes minimising waste, conserving resources, and reducing our environmental impact. Employees commit to making sustainable choices daily, whether it's through using reusable materials, reducing energy consumption, or supporting eco-friendly practices.

COMPLIANCE

All the Company's employees are required to comply with the Employees Code of Conduct. Violation of Employees Code of Conduct or failure to report violations will result in disciplinary action.

OUTSIDE EMPLOYMENT

While the Company does not prohibit employees from holding second jobs, it expects the employees to devote their primary work efforts to the business and operation of the Company. It is important that any other employment does not interfere with an employee's job responsibilities for the Company. All employees are expected to refrain from employment outside of the Company that:

- could be inconsistent with the interests of the Company;
- could have a derogatory or adverse effect on the Company;
- could require devoting so much time and effort to the job that their productivity, efficiency and/or work quality at the Company could be adversely affected;
- could require the performance of tasks or services for an organisation which is a competitor of the Company or which does business with the Company.

REPORTING CONCERNS AND VIOLATIONS

Employees are required to report any known or suspected violations of Employees Code of Conduct in a timely manner. Reports may be made to a supervisor or a more senior manager. Please follow the BCG Whistleblowing Policy for the guidance on reporting.

The Company will keep reports and investigations confidential to the fullest extent practical.

Any employee who reports a violation will be protected from retaliation for reporting such violations. Any supervisor or manager who is informed of a potential violation is required to escalate it to the Company's management.

FINAL PROVISIONS

The provisions of this Employees Code of Conduct are applicable in so far as employment relationship is not ratified under the laws and other legal acts of the jurisdiction of the Company employee is employed.

This Employees Code of Conduct is an inseparable and mandatory annex to the employment contract.
