

CODE OF CONDUCT



The Code of Conduct sets out the principles that guide everything we do at Shibui with a strong ethical and moral conscience. This code is part of our long-term commitment to becoming a sustainable company.

When you are an employee of Shibui or have any working relationships with the company delivering products or services on its behalf, regardless of which country you work in, the Code of Conduct applies to you.

Our mission is to contribute to organisations and society by exploring a new set of ideas and ways of conducting organisational development.

We are providing value proposition by contributing:

- organisational development consultancy based on a group psychodynamics approach;
- management and team development training based on experiential learning;
- keynotes by internationally acknowledged scientists, sport and art personalities, raising awareness on social, environmental and governance sustainability.

Yours sincerely, Kęstutis Vingilis, Managing partner of Shibui



THE WAY WE DO BUSINESS



NO DISCRIMINATION

We are against any form of discrimination. We make sure that every single employee and service provider has the same opportunities regardless of gender, ethnicity, nationality, age, sexual orientation, political or religious affiliation, or physical capacity.

ANTI-HARASSMENT

It's a zero-tolerance policy. No form of physical, verbal or non-verbal harassment is ever accepted – whether it's unwelcome behaviour of a sexual nature, bullying, constantly or repeatedly ignoring a colleague, or any other form of hostile conduct.



CONFLICT OF INTEREST

Engaging in business with any company that is owned, managed by, or which employs the Shibui employee or service provider, or a close relationship (relatives) of Shibui's employee or service provider constitutes a conflict of interest, and must therefore be disclosed to the company.

INTELLECTUAL PROPERTY RIGHTS

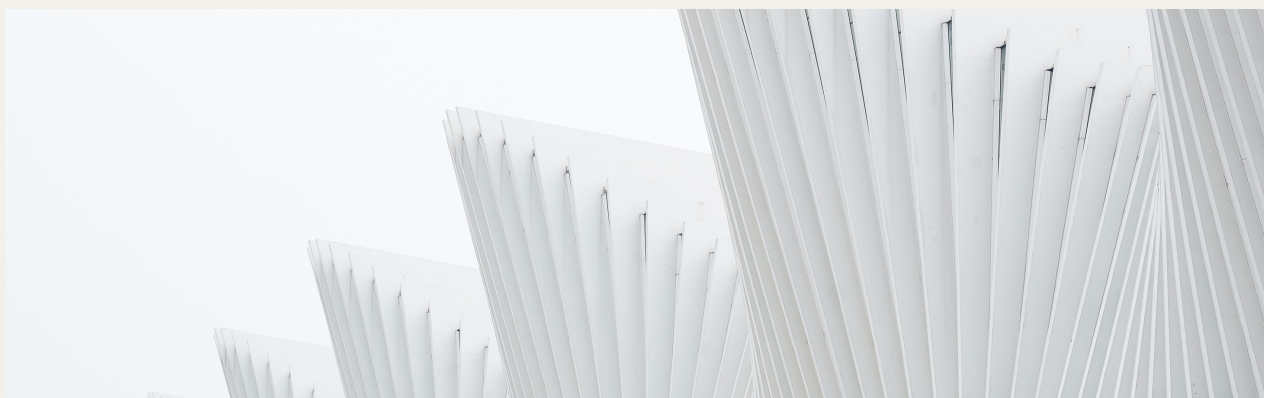
Shibui is committed to respecting the intellectual property rights of third parties. Shibui expects that all employees and service providers on behalf of Shibui take the intellectual property rights into consideration in their daily work.

ENVIRONMENTAL RESPONSIBILITY

Shibui commits to raising awareness, encouraging participation and educating employees and service providers in environmental and social sustainability issues. Progress on implementing environmental sustainability goals will be monitored, reviewed and reported on a regular basis.

BUSINESS INTEGRITY

Business integrity is defined as both the actual and perception of ethical behaviour in business that is in line with the Shibui Code of Conduct and our commitment to run our business in a socially responsible way. It means that we adhere to all applicable laws and regulations as well as standards set by Shibui.



DATA PRIVACY

The right to privacy is a fundamental human right and should be respected at all times. Shibui assumes accountability for the compliant processing of personal data by itself or by its trusted service and collaborative partners. Any information related to an identifiable person must be collected and processed according to the EU GDPR.

ACCURATE ACCOUNTING AND RECORD-KEEPING

We must ensure we follow all applicable standards, principles, laws and practices for accounting and financial reporting. As employees and service providers we must also ensure that no part of any payment is to be made for any purpose other than what is fully and accurately described in Shibui's books and records, we have zero tolerance for corruption.

HUMAN RIGHTS

At Shibui we are committed to acting responsibly and with respect to all the people affected by our operations – employees and service providers, subcontractors and, of course, the customers.

LEGAL COMPLIANCE

As a minimum requirement, Shibui is committed to full compliance with legal or regulatory requirements and industry standards.



EMPLOYEE DECLARATION

In order to ensure that employees are aware and abide to the Shibui Code of Conduct (the Code), an Employee Declaration shall be completed annually, or as requested by Shibui from time to time.

SHIBUI CODE OF CONDUCT EMPLOYEE DECLARATION

Shibui Code of Conduct (the Code) set out the policies for all Shibui personnel (including contract employees and partners) with respect to their relations with other employees, members, clients, suppliers and the community in general.

I declare:

1. I have read and understood the Code.
2. I am in compliance, to the best of my knowledge and belief, since the last annual declaration/commencement of employment or contractual relationship up to the date indicated below, with all policies as stated in the Code.
3. I am not aware of any breach of the Code.
4. I recognise that failure to conform to the Code may result in severe disciplinary measures.

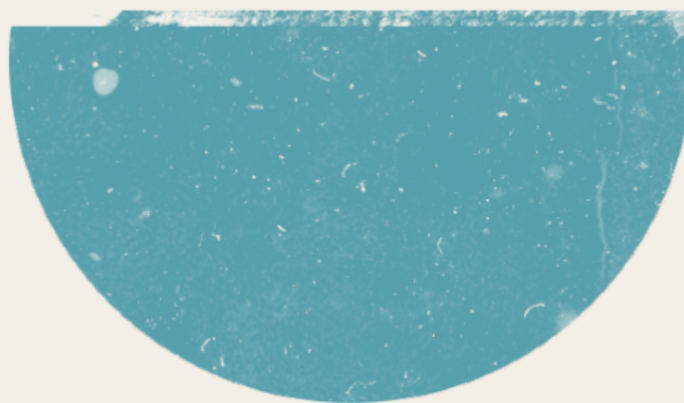
NAME, SURNAME AND SIGNATURE

DATE

SUPPLIER CODE OF CONDUCT

At Shibui we believe that companies have the same social and ethical responsibilities as individuals. Wherever we do business, we are committed to complying with existing laws and regulations and the purpose of the Supplier Code of Conduct is to ensure that all Shibui suppliers also operate in accordance with internationally recognised standards. It therefore covers all the basic requirements related to human rights, labour, environment and anti-corruption. Compliance with the terms of the Shibui Code of Conduct is part of our standard terms of business with suppliers. It is designed to apply primarily to our suppliers and their subcontractors; however, we do encourage our suppliers to implement the Code of Conduct upstream in their own value chain.

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SUPPLIER CODE OF CONDUCT

As a Shibui Supplier I hereby declare that we operate in accordance with internationally recognised standards. It therefore covers all the basic requirements related to human rights, labour, the environment and corruption prevention. By following this, we comply with the terms of the Shibui Supplier Code of Conduct stated below.

1. LEGAL COMPLIANCE

In addition to meeting the terms of the Shibui Code of Conduct, our suppliers should comply with all national laws and regulations. If any conflicts are detected, the suppliers must inform Shibui immediately. Shibui will then, in cooperation with our suppliers and the relevant stakeholders, agree on the most appropriate course of action that will help to foster respect for fundamental human rights, labour standards and the environment.

2. FORCED LABOUR AND DIGNITY AT WORK

Our suppliers must not participate in, or benefit from, any form of forced labour, including bonded labour, in accordance with the ILO (International Labour Organisation) Conventions Nos 29 and 105; also, suppliers should not engage in or benefit from the use of child labour in accordance with ILO Convention No 138. Our suppliers should respect and protect their employees from any acts of physical, verbal, sexual or psychological harassment, abuse or threats in the workplace, whether committed by managers or fellow workers. Shibui expects suppliers to care about employee well-being and make an effort to hear their voice and improve matters accordingly.

3. CORRUPTION PREVENTION

Our suppliers should have a corruption prevention programme, officer or guidelines in accordance with national corruption prevention law, and should propagate transparency policy in organisational behaviour and in purchasing or selling products or services. Our supplier should not use bribes, unlawful lobbying or in any other method to unjustly influence public or business officials, the judiciary or private parties.

4. DISCRIMINATION

Our suppliers must not engage in or support discrimination on the basis of race, colour, sex, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age, disability or other distinguishing characteristics, in accordance with the ILO Conventions Nos 100 and 111.

5. ENVIRONMENTAL AND SOCIAL SUSTAINABILITY

Shibui is taking action to reduce the environmental impacts of its activities and is also focusing on social responsibility. Therefore we expect that our suppliers should have their own sustainability agenda and guidelines (carbon footprint, waste, energy, paper policy, social) with clear targets and actions. Our suppliers must also comply with all applicable environmental regulations and laws in the country they are operating in.





SUPPLIER DECLARATION

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SHIBUI CODE OF CONDUCT SUPPLIER DECLARATION

The Shibui Code of Conduct (the Code) sets out the policies for all Shibui personnel (including contract employees and partners) with respect to their relations with other employees, members, clients, suppliers and the community in general.

I declare that:

1. I have read and understood the Code.
2. I am in compliance, to the best of my knowledge and belief, since the last declaration, or commencement of supplier or contractual relationship up to the date indicated below, with all policies as stated in the Code.
3. I am not aware of any breach of the Code.
4. I recognise that failure to conform to the Code may result in severe disciplinary measures.

NAME, SURNAME AND SIGNATURE

DATE