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Code of Ethics

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The Code of Ethics described in this document is **AE Partner Liepājas speciālās ekonomiskās zonas SIA** (hereinafter – Company, Organisation, AE Partner) moral framework setting the moral values, principles and norms of the Company. It serves as a guide for every employee of the Company to promote ethical and responsible behavior.

The Code of ethics applies first and foremost to everyone itself. It imposes a responsibility to ensure that unethical behavior is not encouraged and that the moral values of the company are not compromised. This Code of ethics helps to maintain ethical standards within the Organisation, promoting fair and just practices at all levels of AE Partner.

1. Behavior Guidelines

Provides a clear standard of behavior within the Organisation, making it clear what is expected in terms of ethical behavior.

- 1.1. I will comply with all the rules, instructions and policies that are binding on me, as it is defined by the Company.
- 1.2. I communicate and I am proactive¹ in sharing information in line with the AE Partner's values (honesty, openness, teamwork, commitment and mutual respect).
- 1.3. I behave and act in a professional and respectful manner, control my emotions, avoid abusive behaviour² and respect the culture of language and communication³.
- 1.4. I choose my clothing appropriate to the work environment, observing generally accepted professional etiquette and personal hygiene.
- 1.5. I respect the rights of my colleagues to their privacy and rest time.
- 1.6. I am focused on solving problems and mistakes, and do not turn a conflict to a colleague personally.
- 1.7. I respect the work of my colleagues and do not make noise or create other distractions at the shared workspace.

2. Hygiene In Decision-Making

It helps ethical decision-making by providing a framework and principles to guide decisions, especially in situations where ethical dilemmas may arise.

- 2.1. When taking a decision, I check all the available information, I base my decisions on facts and avoid emotional decisions or decisions that are based on my personal likings/preferences.
- 2.2. I make decisions based on the interests, values and strategy of AE Partner⁴.
- 2.3. When making decisions, I consider the interests and needs of the parties involved and seek a sustainable solution⁵.

3. Improved Accountability

The Code establishes accountability by stating that everyone is responsible for their own actions.

- 3.1. I am responsible for the decisions that I make as well as for the consequences of those decisions.
- 3.2. I will carry out my work responsibly and competently, ensuring fair treatment of the Company and colleagues, in accordance with this Code of ethics.

3.3. I do not condone, conceal or cover up unlawful or unethical conduct or decisions.

3.4. I take responsibility, maintain accuracy, admit my mistakes and improve my skills.

3.5. I communicate openly when receiving tasks that exceed my available time or expertise, ensuring they can be addressed in a timely and high-quality manner.

4. Strong Trust

Applying ethical standards in everyday life enables AE Partner to build trust with all stakeholders - customers, employees, investors and society.

4.1. I respect and accept the individuality and diversity of others.

4.2. I listen to different points of view without judgement or discrimination.

4.3. I give feedback constructively and empathetically.

4.4. I express criticism in private.

4.5. I do not misuse or damage the property or resources of colleagues or the Company.

4.6. I seek solutions that meet the interests of all parties⁶ and build mutual trust openly.

4.7. I communicate directly and openly, and do not use superior authority to advance my interests and resolve my conflicts.

5. Positive organisational culture

Promotes Company values such as integrity, honesty, respect and trust.

5.1. I am committed to building and maintaining a positive organisational culture based on openness, tolerance, fairness and inclusion.

5.2. I am committed to and contribute to the achievement of AE Partner objectives.

5.3. I am supportive and empathetic⁷, with fair treatment to all, regardless of gender, race, religion, sexual orientation, etc.

5.4. I am committed to a sustainable approach⁵, responsible for the Company's resources and the environment.

5.5. I care about and I am a part of the Company's reputation.

6. Risk mitigation

Help mitigate risks associated with unethical behavior, reputational risks, financial losses and legal penalties.

6.1. I do not disclose even potentially sensitive and confidential information⁸ to third parties.

6.2. I do not create rumors or disseminate information that may be misinterpreted.

7. Conflict of Interest

A conflict of interest is a situation in which an employee's private interests financial, personal, professional, or otherwise —may influence, or appear to influence, their ability to make objective, fair, and business-aligned decisions. Such situations may negatively affect the interests of both the company and the client.

7.1. Employees must avoid any situations that may create an actual or perceived conflict of interest, including interactions with suppliers, clients, partners, and other external parties.

7.2. Employees are prohibited from using their position, duties, information, or company resources for personal gain or for the benefit of individuals whose interests are not aligned with the company.

7.3. Any actual or potential conflict of interest must be reported immediately to the direct manager and the HR function for appropriate measures or restrictions to be determined.

7.4. Acceptance of gifts, hospitality, or invitations is allowed only when it is reasonable, transparent, and compliant with company policies, and when it does not create unequal treatment or the possibility of influencing decisions.

7.5. Employees must avoid external activities that could negatively affect the objectivity of their work duties, create competition with the company, or harm the company's reputation.

7.6. The company reserves the right to establish additional restrictions when necessary to ensure reputation, security, or regulatory compliance.

8. Actions in the Event of a Conflict of Interest

If a conflict of interest arises, the employee must stop all related activities and await management instructions. Failure to report an identified, detected or perceived conflict of interest is considered a violation of this regulation.

By each paragraph of the Code:

* I comply with the stated norms of the Code of Ethics not only within the Organisation but also outside of it.

** I am aware that compliance with the Code of Ethics is my personal responsibility and obligation.

*** I am bound by the Code of Ethics regardless of my position, nationality, age, gender, etc.

Explanatory dictionary:

1	Proactive	One who acts in anticipation of future problems, needs or changes, rather than merely reacting to what has happened.	Point 1.2.
2	Abusive behavior	Behavior that includes oppression, humiliation, hate speech, verbal or physical aggression, negative attitudes and comments that cause emotional or physical distress to another person.	Point 1.3.
3	Communication culture	Communication culture includes: *Speaking culture: - Non-verbal communication: appropriate gestures, posture, positive facial expressions. - Verbal communication: expressing thoughts accurately and clearly, avoiding redundancy, unmotivated pauses and repetition. Use of positive language. * Listening culture: listening to the speaker, taking an interest and maintaining attention. * Language culture: the traditions, norms and ways in which speakers use language to communicate and express their thoughts and emotions. This includes grammar, pronunciation of words, use and interpretation of expressions.	Point 1.3.
4	Organisation's interests, values, strategy	https://erp.aepartner.lv/intranet/page/tmg	Point 2.2.
5	Sustainable solution	One that serves both- today and the future and does not harm the environment or people.	Point 2.3. and 5.4.
6	Stakeholders	Employees, customers, partners and institutions.	Point 4.6.
7	Empathetic	Able to empathize with another person's situation and feelings, offering support and understanding.	Point 5.3.
8	Sensitive and confidential information	Information or data the unauthorized access, disclosure or use of which could cause significant harm or risk to an individual or an Organisation (confidential information may vary in content and availability across business units).	Point 6.1.

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