

ALLIVE EUROPE UAB CODE OF CONDUCT

A MESSAGE FROM OUR LEADERSHIP

Allive Europe UAB was built on a simple conviction: that premium quality and genuine responsibility must go hand in hand. As a global leader in hemp cultivation and manufacturing, combining Lithuania's deep agricultural heritage with modern processing expertise, and operating across Europe, North America and Asia, we understand that every decision we make leaves a mark on people, communities and the natural world.

This Code of Conduct is our public commitment. It sets out the principles that guide how we treat the people who work for us, how we engage with our suppliers and business partners, and how we manage our impact on the environment. It applies equally to our employees in Lithuania, Canada and the United States, and to every organisation that works with us in our supply chain.

We hold ourselves to the same standards we ask of others. Where international standards exceed local law, we apply the higher bar. Where local law is stricter, we follow it.

Skirmantas Nikštelė

Founder and CEO of Allive Europe UAB

1. SCOPE AND PURPOSE

This Code of Conduct (the "Code") sets out the ethical, social and environmental principles that guide the daily business of Allive Europe UAB ("Allive"). These principles provide a framework for responsible conduct in our interactions with each other, in our treatment of the people and communities affected by our operations, and in managing our impact on the natural world.

Allive is committed to conducting its business in a sustainable and responsible manner. We recognise that long-term success depends on more than just the quality of our products; it also depends on the trust of our employees, customers, suppliers, and the communities in which we operate.

All Allive employees, including management at all levels, are expected to comply with the principles of this Code and to take personal responsibility for upholding them in their day-to-day work. The Code also applies to contractors, labour agencies and service providers engaged by Allive.

Allive also expects its suppliers, subcontractors, and business partners to operate in accordance with the principles of this Code or equivalent standards of their own. Business partners are responsible for communicating the requirements of this Code within their own organisations and cascading equivalent expectations to their own suppliers and subcontractors.

2. INTERNATIONAL FOUNDATIONS

Allive conducts its business in full compliance with all applicable national laws and regulations in each country where it operates, including Lithuanian, Canadian and United States legislation governing employment, health and safety, environmental protection and trade.

The following internationally recognised frameworks inform the principles in this Code:

- United Nations Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- The ten principles of the UN Global Compact (UNGC)
- OECD Guidelines for Multinational Enterprises

Allive is also attentive to the EU Corporate Sustainability Due Diligence Directive (CSDDD) as an expression of direction for responsible business conduct across European supply chains.

3. HUMAN RIGHTS AND DIGNITY

Allive recognises its responsibility to respect human rights across its own operations and throughout its supply chain, and does not tolerate any violation of fundamental human rights in connection with its activities or those of its business partners.

3.1 No Forced, Bonded or Prison Labour

Allive prohibits all forms of modern slavery, including forced labour, bonded labour, human trafficking and involuntary prison labour.

All work at Allive and across our supply chain is freely chosen and voluntary. No individual may be forced to work through the use of violence, intimidation, deception, threats, debt bondage or any other form of pressure. The use of prison labour, including individuals on work-release or rehabilitation programmes, is prohibited.

Employees must retain possession of their own identity and travel documents at all times.

No deposits, recruitment fees or any other financial obligations may be imposed on employees as a condition of employment. Where such fees are found to have been paid, they must be reimbursed. Recruitment agencies must comply with this Code.

Employees are free to terminate their employment in accordance with applicable law, without penalty or retaliation.

Actual working conditions must correspond to those communicated at the time of recruitment.

3.2 Protection of Young Employees and Prohibition of Child Labour

Allive does not employ any person below the minimum working age established by the laws of the country where work is performed. Where local law does not set a minimum age, employees must be at least fourteen (14) years old.

Where young persons between 14 and 16 years of age are employed, they may only perform light work that is appropriate to their physical capacity, does not harm their health, safety or development, and does not interfere with their school attendance or education. Strict compliance with applicable working hour limits for this age group is required at all times.

Regardless of the minimum hiring age applied, employees under the age of 18 shall not:

- perform work at dangerous heights or in confined spaces;
- work with hazardous substances, dangerous machinery, equipment or tools;
- perform work involving the manual handling or transport of heavy loads;
- perform any work involving the production, handling, distribution or sale of alcohol at any stage of the process;
- work night shifts or perform any comparable activity harmful to their health, safety, morals or development.

3.3 No Discrimination

Allive is committed to equal treatment and equal opportunity. Discrimination in hiring, compensation, access to training, promotion, disciplinary action or termination based on any of the following is prohibited:

- race, colour, ethnic or national origin, nationality or caste;
- gender, gender identity or expression, pregnancy or maternity;
- age, disability, religion or belief, political opinion;
- sexual orientation, marital or family status;
- trade union membership or activities;

- any other characteristic protected by applicable law.

Medical tests, including pregnancy or HIV tests, shall not be required as a condition of employment. Hiring and employment decisions are based solely on professional qualifications, skills and performance.

3.4 Dignity at Work — No Abuse or Harassment

Everyone working at or with Allive is entitled to be treated with dignity and respect. Physical, sexual, verbal and psychological abuse; coercion; threats; intimidation; and all forms of harassment are strictly prohibited. Any disciplinary measures must be proportionate, legally compliant and clearly communicated. No monetary fines, physical punishment, humiliation or intimidation shall be used as disciplinary measures.

4. EMPLOYEE RIGHTS AND WORKING CONDITIONS

4.1 Employment Terms

All employment relationships at Allive are based on a written employment contract concluded in accordance with local law and provided in a language understood by the employee. Contracts clearly set out working hours, wages, duties, notice periods and applicable benefits. Any changes to employment terms must be agreed in writing.

- Allive verifies the legal right to work of each employee prior to hire.
- Termination of employment is carried out in full compliance with the applicable national legislation.
- Allive maintains accurate and confidential personnel records in line with applicable data protection requirements.

4.2 Wages and Benefits

All employees receive wages that meet or exceed the statutory minimum wage in force at the time of payment. Allive recognises that fair wages are essential to the wellbeing of employees and their families and aims to pay above minimum levels in line with skill, responsibility and market benchmarks.

- Wages are paid monthly, directly to an employee-controlled bank account, within legally prescribed deadlines.
- Each employee receives a detailed payslip covering the pay period, regular and overtime hours, rate of pay, applicable bonuses and all deductions.
- Overtime work is compensated at the legally mandated premium rate. Deductions from wages are permitted only as required by law and may not reduce net pay below the applicable minimum wage.
- All employees receive legally mandated benefits, including social insurance contributions, annual leave, maternity/paternity leave and sick leave.

4.3 Working Hours and Rest

Working hours are regulated in accordance with applicable national legislation. The normal working week does not exceed 40 hours. The combined average of regular and overtime hours does not exceed 48 hours per week over any reference period, and in no circumstances exceeds the absolute ceiling of 60 hours in any seven-day period.

- Overtime requires the prior written consent of the employee. Employees may decline overtime without any negative consequences.
- Employees are informed about overtime obligations before the start of employment and in advance of each overtime shift.
- Overtime hours are subject to the limits established by applicable national legislation in each country of operation. Employees and their managers are responsible for ensuring compliance with the working

hour limits prescribed by the laws of the country where work is performed (including, where applicable, limits on daily, weekly and annual overtime hours).

- A minimum uninterrupted rest period of 11 hours between working days and 35 hours per week is guaranteed.
- At least one rest day per seven-day working week is provided.
- Employees under 18 years of age may not work overtime or night shifts.

4.4 Freedom of Association and Collective Bargaining

Allive respects the right of all employees to freely form, join or not join trade unions and employees' organisations of their choice, and to engage in collective bargaining, without interference, discrimination or retaliation. Employees' representatives have reasonable access to the workplace and are not subjected to disadvantageous treatment as a result of their representative activities.

4.5 Grievance Mechanism

Allive provides a confidential and anonymous channel through which any employee, contractor or business partner may raise concerns about potential violations of this Code or other workplace issues without fear of retaliation. All submissions are registered, tracked and addressed in a timely manner. The identity of reporters is protected to the fullest extent possible. Retaliation in any form is prohibited.

- HR & Administration Director (internal, confidential): hr@allive.com
- Anonymous grievance box: available at the Allive Kaunas facility
- Dedicated mailbox: konfidencialu@allive.com

Reports may also be submitted anonymously by suppliers, agency employees and temporary employees.

5. HEALTH, SAFETY AND WELLBEING

Allive operates a production facility in Kaunas, Lithuania, and takes health and safety seriously across all areas, from the pressing lines and packaging floors to the warehouse, laboratory and administration.

5.1 Safe Working Environment

Allive maintains a proactive health and safety management system in line with applicable national legislation and international best practice. We identify, assess and mitigate occupational risks before they result in harm.

- All employees receive documented quality, health and safety induction training before or on their first day of work, and job-specific training before commencing each new task.
- Annual refresher training covers personal protective equipment (PPE), evacuation procedures, first aid, chemical handling and equipment safety.
- Certified first-aid personnel are available on every shift.
- Accidents, incidents and near-misses are recorded, investigated and used to improve prevention measures.
- PPE appropriate to each workstation is provided at no cost to employees.

5.2 Fire Safety and Emergency Preparedness

All emergency exits are clearly marked, unobstructed and operable by a single movement in the direction of travel. Emergency lighting covers all evacuation routes independently of exit signage. Evacuation drills are conducted at least once every 12 months, covering all shifts and all areas. Fire extinguishers are inspected periodically.

5.3 Workplace Facilities

Allive provides clean drinking water freely accessible to all employees throughout every shift. Sanitary facilities are maintained in good condition, well-lit, ventilated and separated by gender. Working areas are adequately ventilated, heated and lit in compliance with applicable standards.

6. ENVIRONMENTAL RESPONSIBILITY

As a certified organic producer holding EU Organic and USDA Organic, environmental stewardship is at the core of what Allive does. We process raw materials that come from the earth, and we recognise our obligation to return value to it. We comply with all applicable environmental laws and continuously work to reduce our footprint.

- Waste is sorted, minimised and recycled wherever possible; corrugated cardboard and plastic packaging waste are recycled as standard practice.
- Chemicals and potentially hazardous materials are stored, handled and disposed of in compliance with legal requirements. Employees handling such materials receive specific training.
- No actions that knowingly cause pollution to air, water or soil are permitted.
- All required environmental permits are maintained and kept current.

We encourage our suppliers to adopt similarly responsible environmental practices and to measure and report on their environmental performance where feasible.

7. BUSINESS ETHICS AND INTEGRITY

Allive competes on the quality and sustainability of its products — never through improper means. Integrity is not a compliance obligation at Allive; it is a business value that we apply in every transaction and every relationship.

7.1 Anti-Corruption and Anti-Bribery

Bribery, corruption, extortion, money laundering and all forms of improper payment are prohibited, whether involving public officials, customers, suppliers or any other party. Gifts and hospitality may only be offered or accepted when they are modest in value, customary in context and could not reasonably be construed as an attempt to influence business decisions.

- Any suspicion of corruption — whether involving Allive employees, suppliers or business partners — must be reported without delay.
- Allive employees must not offer, promise or accept any benefit that could compromise, or could reasonably appear to compromise, their professional judgement.

7.2 Fair Competition

Allive competes fairly and in full compliance with competition law. Employees must not participate in price-fixing, market allocation, bid-rigging or any other anticompetitive practice.

7.3 Conflicts of Interest

Employees must avoid situations where personal interests conflict — or could appear to conflict — with the interests of Allive. Any potential conflict of interest must be disclosed promptly to the employee's direct manager or to the CEO.

7.4 Accurate Records

All business records, financial statements and product documentation must accurately reflect the underlying reality. Falsification, concealment or destruction of records is prohibited. This includes documentation provided during audits or to regulatory authorities.

7.5 Data Privacy and Confidentiality

Allive handles personal data and confidential business information in accordance with the EU General Data Protection Regulation (GDPR) and applicable Lithuanian legislation. Confidential information — whether belonging to Allive, its employees, customers or suppliers — may not be disclosed to third parties without proper authorisation.

8. RESPONSIBLE SUPPLY CHAIN

Allive operates a traceable supply chain: from the certified organic hemp seed sourced from contracted growers, through our own processing and manufacturing operations in Kaunas, to finished products delivered to retail partners worldwide. We take responsibility for the social and environmental conduct of those with whom we do business.

- All suppliers and sub-contractors are expected to operate in accordance with the principles of this Code or equivalent standards of their own.
- Allive maintains the ability to trace all components and ingredients of its merchandise to their source and will provide this information to customers and auditors upon request.
- All production facilities engaged in the manufacture of Allive products must be disclosed to, and approved by, our major retail clients.
- We will not knowingly engage a supplier that uses forced labour, child labour or any other practice that violates fundamental human rights.
- Allive encourages its suppliers to implement their own codes of conduct and to cascade the principles of this Code to their own sub-contractors.
- Allive reserves the right to assess suppliers through questionnaires, document reviews or on-site audits where appropriate.

9. REPORTING CONCERNS AND VIOLATIONS

Anyone who becomes aware of a potential violation of this Code, whether an employee, a contractor, a supplier or any other party, is encouraged to report it. Allive does not tolerate retaliation against anyone who raises a concern in good faith.

How to report:

- HR & Administration Department (internal, confidential): hr@allive.com
- Anonymous grievance box: available at the Allive Kaunas facility
- Dedicated mailbox: konfidencialu@allive.com

All reports are reviewed and addressed in a timely manner. The reporter's identity is protected to the extent permitted by law. Where a violation is confirmed, appropriate corrective action will be taken, which may include disciplinary measures or termination of the business relationship.

10. GOVERNANCE AND REVIEW

This Code is approved by the CEO of Allive Europe UAB and takes effect upon formal adoption by management order. All current employees are familiarised with the Code within a defined period following adoption; new employees are familiarised upon joining and sign a written acknowledgement. Employees receive periodic Code of Conduct training appropriate to their role.

The Code is reviewed at least every two years, or earlier, whenever significant legal or operational changes occur.
