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SUSTAINABILITY POLICY

Purpose This Sustainability Policy outlines the core principles, corresponding implementation measures, and the responsibility framework for sustainability management within MAXIMA Group.

Scope of application For all Group Companies.

Definitions

Policy	This Sustainability Policy of MAXIMA Group companies.
Assurance services provider	An entity elected by the Holding Company's General Meeting is responsible for providing limited assurance services on the Consolidated Sustainability Statement.
Holding Company	MAXIMA GRUPĖ, UAB, a company incorporated and operating under the laws of the Republic of Lithuania, legal entity code 301066547.
MAXIMA Group	Group of companies consisting of the Holding Company and all its directly and (or) indirectly controlled subsidiaries.
Group Company or Company	Any company of MAXIMA Group.
Global Compact	The Global Compact is the world's largest voluntary social responsibility initiative, active since 1999. At the basis of the Global Compact are 10 principles in the areas of human rights, environment, labour and anti-corruption, and the 17 Sustainable Development Goals underpinning the UN's "2030 Agenda for Sustainable Development". More about the Global Compact: www.unglobalcompact.org
European Green Deal	A roadmap for action presented by the European Commission on 11 December 2019, aiming to make Europe the first climate-neutral continent by 2050, boosting the economy, improving human health and the quality of life, caring for nature and leaving no one behind
Paris Agreement	A global agreement among nations to combat climate change, with the key objective to limit the increase in the average temperature of the earth to 2 °C compared to the pre-industrial level and to continue

	to aim to limit the increase of the average earth temperature to no higher than 1.5 °C.
Taxonomy Report	A regulatory disclosure under the EU Taxonomy Regulation ¹ , presenting a company's economic activities and their conformity with established environmental sustainability criteria. This aims to provide transparent data for sustainable investment.
Sustainability targets	MAXIMA Group-wide targets, and individual Company-level targets related to management of sustainability impacts, risks and opportunities.

1. General provisions

- 1.1. The Policy establishes MAXIMA Group's commitment to embedding sustainability as one of its core values and strategic priority across all business activities. The Group Companies pursue not only to minimizing negative impacts but also to actively fostering a healthier planet and a more equitable society.
- 1.2. This Policy shall be implemented in all MAXIMA Group Companies, taking into account each Company's operational context, business maturity, local context, management systems, internal practices, procedures, and national regulations.
- 1.3. Results arising from the implementation of this Policy will be monitored and reported under the applicable standards, in line with agreed processes and respective regulations.

2. Sustainability principles and main measures for their implementation

- 2.1. The MAXIMA Group as a large business entity with an important presence in the Baltic region markets acknowledges that each Company has to take the responsibility over their actions, which have an impact on the environmental protection, social welfare, good governance, economic viability and long-term value creation. For this reason, the Group Companies aim to create long-term value in a sustainable way that strengthens synergies between financial and non-financial return goals.

Environmental Protection

- 2.2. Each Group Company shall contribute to the implementation of the European Green Deal and the Paris Agreement by committing to reduce gross CO₂e emissions in the near-term.
- 2.3. MAXIMA Group acknowledges the importance of management its environmental impact, and therefore:
 - 2.3.1. sets climate change mitigation goals aligned with the Paris Agreement;
 - 2.3.2. monitors Companies' activities related to circularity for both food and non-food streams, and implements concrete measures to reduce negative impacts and enhance positive outcomes;
 - 2.3.3. strives for a reasonable contribution to sustainable material use through packaging solutions, especially for its private label products, by prioritising designs and materials that minimise packaging-related waste and maximise recyclability or reusability.
- 2.4. The Group Companies are committed to continuously assessing their environmental footprint and undertaking additional measures in other areas of environmental protection where a significant impact, risk or opportunity is identified.

¹ Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

Social Welfare and Ethical Conduct

- 2.5. MAXIMA Group is dedicated to upholding the highest ethical standards, ensuring fairness in labour practices, respecting human rights, and promoting diversity, equality, and inclusion, for this reason Companies follow the principles set out in the following international documents:
- 2.5.1. the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct²;
 - 2.5.2. the United Nations (UN) Guiding Principles on Business and Human Rights³;
 - 2.5.3. the Declaration of the International Labour Organisation (ILO), as well as 8 fundamental conventions of the ILO⁴;
 - 2.5.4. the International Bill of Human Rights⁵.
- 2.6. MAXIMA Group recognises its responsibility to engage with and contribute positively to the communities in which it operates, striving to be a responsible corporate citizen.
- 2.7. MAXIMA Group is also commits to respect ten principles of the Global Compact in the areas of human rights, labour rights, environmental protection and the fight against corruption.

Good Governance

- 2.8. Effective sustainability governance at MAXIMA Group includes the proactive identification, assessment, and management of environmental, social, and governance (ESG) impacts, risks and opportunities (IRO). These considerations are part of periodically conducted double materiality assessment, which form the backbone for sustainability goals and long-term value creation.
- 2.9. Each Group Company is responsible for integrating material sustainability-related impacts, risks and opportunities (IRO) into its business strategy, risk management and key decision-making processes, in accordance with its local operational context.
- 2.10. MAXIMA Group is committed to robust and effective governance that integrates sustainability considerations, starting from its core business strategy and extending across all levels of its main operations.
- 2.11. Group Companies, when adopting new internal processes or updating existing ones, evaluate the need for additional roles and responsibilities related to sustainability activities.
- 2.12. Group Companies also take sustainability practices into account while ensuring compliance with relevant laws and regulations.

Economic Prosperity and Long-Term Value Creation

- 2.13. MAXIMA Group is committed to achieving sustained financial success and growth, recognising that this is intrinsically linked to its environmental and social performance. This principle guides towards a commitment to profitable operations, efficient resource utilisation, and continuous innovation.
- 2.14. MAXIMA Group acknowledges the critical role of comprehensive stakeholder engagement in driving sustainable development. We strive for sustainable, ethical, transparent, and honest cooperation with all stakeholders, including customers, employees, suppliers, communities, media and other stakeholders.

² More information is available at: [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | en | OECD](#)

³ More information is available at: [GuidingPrinciplesBusinessHR_EN.pdf \(ohchr.org\)](#)

⁴ More information is available at: [The text of the Declaration and its follow-up | International Labour Organization \(ilo.org\)](#) and [Conventions, Protocols and Recommendations | International Labour Organization \(ilo.org\)](#)

⁵ More information is available at: [International Bill of Human Rights | OHCHR](#)

- 2.15. Group Companies foster innovation and continuous improvement across all operations to enhance our sustainability performance, develop sustainable solutions, and adapt to evolving environmental and social challenges.

3. Main Roles and Responsibilities for Sustainability Policy Implementation

3.1. The Management Board of the Holding Company:

- 3.1.1. establishes strategic sustainability guidelines during the approval of MAXIMA Group strategy (if such a strategy is adopted);
- 3.1.2. approves MAXIMA Group-wide sustainability targets and oversees their implementation;
- 3.1.3. approves MAXIMA Group-wide sustainability related policies;
- 3.1.4. evaluates the main considerations of double materiality assessment and approves its outcomes;
- 3.1.5. evaluates and approves a consolidated sustainability statement;
- 3.1.6. adopts the decision that each Group Company shall issue a separate sustainability statement if legally required.

- 3.2. **Audit Committee** responsibilities related to sustainability management is established in the Regulations of the Audit Committee. Among other the main responsibility is to oversee the sustainability reporting process and the independence of the assurance provider.

3.3. Holding Company:

- 3.3.1. together with the Companies, conducts and periodically reviews the double materiality assessment;
 - 3.3.2. develops MAXIMA Group-wide sustainability targets;
 - 3.3.3. oversees and coordinates the implementation of the MAXIMA Group-wide sustainability targets;
 - 3.3.4. establishes a unified framework for sustainability reporting and data control to facilitate the preparation of a consolidated sustainability statement;
 - 3.3.5. performs limited verification of the quantitative ESG data submitted by the Group Companies;
 - 3.3.6. based on information and data provided by the Group Companies, prepares a consolidated sustainability statement, including Taxonomy report;
 - 3.3.7. coordinates compliance with the significant sustainability-related requirements across the MAXIMA Group.
- 3.4. As the centralised internal audit function for the MAXIMA Group, the Internal audit department periodically evaluates the effectiveness of internal controls supporting sustainability reporting within all Group Companies.

3.5. Group Company:

- 3.5.1. is responsible for proactive management of sustainability impacts, risks and opportunities (IRO) and its integration into key business functions and operational decision-making;
- 3.5.2. adopts decisions to implement the Management Board approved policies and other related internal documents;
- 3.5.3. provides the necessary information and data to the Holding Company to facilitate its periodic reviews of the double materiality assessment;

- 3.5.4. sets individual Company-level sustainability targets;
 - 3.5.5. implements effective measures that ensure MAXIMA Group-level and individual Company-level sustainability targets are met;
 - 3.5.6. collects, reviews, and verifies the ESG data necessary for the Consolidated Sustainability Statement, and provide it to the Holding Company or to the Assurance services provider;
 - 3.5.7. establishes internal responsibilities for sustainability, including the designation of accountable roles or functions, and ensures adequate capacity and resources to implement sustainability commitments;
 - 3.5.8. regularly reviews the practical applicability of this Policy at the Company level and informs the Holding Company of any significant challenges, misalignments or capacity gaps in its implementation.
4. The Owner of the Policy in the Holding Company is the Administrative department which is responsible for:
 - 4.1. properly implementing the Policy's provisions;
 - 4.2. initiating a periodical review of the Policy;
 - 4.3. submitting the updated Policy for approval to the competent body.
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