



EQUAL OPPORTUNITIES POLICY OF ISM UNIVERSITY OF MANAGEMENT AND ECONOMICS AND RELATED IMPLEMENTATION PROCEDURE

INTRODUCTION

1. By introducing this equal opportunities policy and its implementation procedure (hereinafter - the Procedure), ISM University of Management and Economics, UAB, (hereinafter - the University) hereby establishes the principles of equal opportunities at the University and the conditions and procedure for their implementation at work.
2. The purpose of this Procedure is to ensure that persons applying for a job or existing employees will be treated equally, unless it is related to the quality of the work performed or other expertise.

CHAPTER I DEFINITIONS

3. **Discrimination** - direct and indirect discrimination, harassment, instruction to discriminate on the grounds of sex, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion.
4. **Equal opportunities** - implementation of human rights enshrined in international human and civil rights documents and laws of the Republic of Lithuania, regardless of gender, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion.
5. **Indirect discrimination** - an action or omission, legal provision or assessment criterion, manifestly neutral condition or practice which is formally identical but the implementation or application of which results in or may result in restriction of the exercise of rights or privileges, preferences or advantages *de facto* based on sex, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion, unless the action or omission, legal provision or assessment criterion,

condition or practice is reasonably justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

6. **Harassment** - unwanted conduct that seeks to insult or insults the dignity of a person and seeks to create or creates an intimidating, hostile, degrading or offensive environment on grounds of sex, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity or religion.

7. **Social status** - education, qualification or training acquired by a natural person and studies in institutions that are part of the system of science and studies, property, income, need for state support as prescribed by law and / or other factors related to the person's financial (economic) situation.

8. **Direct discrimination** - less favourable treatment of a person compared to the previous or applicable treatment of any other person in comparable circumstances on grounds of sex, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity or religion, with the exception of:

- 1) statutory age restrictions where this is justified by a legitimate aim and is pursued by appropriate and necessary means;
- 2) statutory requirement to speak the state language;
- 3) prohibition to participate in political activities in cases prescribed by law;
- 4) different rights applicable on the grounds of nationality as prescribed by law;
- 5) special measures established by law in the field of health protection, occupational safety, employment, and labour market in order to create and apply conditions and opportunities guaranteeing and promoting integration into the working environment;
- 6) special temporary measures established by law to ensure equality and prevent the violation of equal opportunities on the grounds of sex, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion;
- 7) situations where, by reason of the nature of the particular professional activities or the conditions under which they are pursued, a particular human characteristic is an essential and decisive professional requirement, and that aim is legitimate and the requirement is proportionate;
- 8) situations where the regulation of restrictions, special requirements or certain conditions relating to a person's social situation is justified by a legitimate aim, and that aim is pursued by appropriate and necessary means.

CHAPTER II

GENERAL PROVISIONS

9. All employees are given equal opportunities. Recruitment and the course of recruitment are determined only on the basis of a person's expertise and criteria related to their work in a respective position. In all cases, the focus is on the ability to perform one's job functions well.

10. The University organises work so that all groups of the society are represented and each employee feels respected and can purposefully use their existing competencies and abilities.

11. In organising its activities, the University creates an environment in which the individual differences of all employees and their contribution are recognized and valued. Every employee has the right to work in an environment that promotes respect for the dignity of every person.

12. All employees are provided with opportunities to learn, develop their skills and pursue professional advancement.

13. The University organises its activities in such a way as to ensure equal working conditions for all employees, opportunities to improve their qualification, to seek professional development, and, if necessary, to requalify, and gain practical work experience. The University also provides equal benefits regardless of the gender, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion of the employees.

14. All employees must adhere to this policy to ensure equal opportunities and avoid discrimination. Employees must not discriminate against, harass, bully or intimidate other employees on the basis of their gender, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion, and must not persecute or take other sanctions against such employees who make unfounded suspicions.

15. Violation of this Procedure shall be considered a violation of job duties. Liability provided for in the Labour Code of the Republic of Lithuania shall apply to such violations. Cases of discrimination identified at the University are immediately referred to the University's Committee on Ethics for investigation, and, if necessary, to the Office of the Equal Opportunities Ombudsman and other competent authorities.

16. The University shall take measures to ensure that an employee who has filed a complaint of discrimination or is involved in a discrimination case, their representative or a person who testifies and provides explanations of discrimination is not persecuted and is protected from hostile behaviour or adverse consequences.

17. The University shall take measures to ensure that persons with disabilities have access to employment, work, careers or training, including appropriate adaptation of facilities, provided that such measures do not impose a disproportionate burden on the University.

CHAPTER III RECRUITMENT AND DISMISSAL OF EMPLOYEES

18. The University welcomes the diversity of staff who qualify for the position and seeks to ensure that all candidates seeking employment are treated fairly and that they are recruited only on the basis of their competencies, qualifications and abilities appropriate to the available position.

19. At the time of recruitment, the most suitable staff for the relevant position must be selected on the basis of their experience, competencies and qualifications.

20. The process of selecting new employees is carried out systematically for all job vacancies at all levels. The selection criteria for all jobs are clearly defined and described in detail.

21. The University's job advertisements are published on online job advertisement portals. Vacancy notices shall be drafted in such a way that they do not give rise to a competition for a vacancy based solely on sex, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity or religion.

22. The selection of new University staff is based on vacancies, suitability and ability to perform the job, and the information received from the candidates will be linked to the qualifications related to the requirements of the job and the match between the candidate's values and the University's culture.

23. The staff responsible for the selection of candidates, job interviews and their appointment are clearly informed about the selection criteria and the requirement to implement the equal opportunities policy. The interview with a candidate shall be attended by at least one member the HR selection staff.

24. All questions asked to candidates for vacancies shall be related to the selection criteria. Selection staff may not ask questions about the candidate's gender, age, sexual orientation, social status, disability or health status, race or ethnicity, religion, convictions or creed, or make assumptions about the candidate's role at home and in their family, if they are not directly related to the application of the guarantees provided for in the Labour Code to the employee.

25. Candidates with disabilities who indicate this when applying for a vacancy will be provided with appropriate facilities for interviews (e.g. easily accessible interview rooms) to ensure equal opportunities with other candidates.

26. When deciding on the dismissal of an employee, the dismissal criteria are applied equally to all employees regardless of gender, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion.

CHAPTER IV EMPLOYEE EDUCATION

27. The University, in view of its strategic goals and financial possibilities, organises training for its staff and informs the staff about it via electronic means; the training is aimed at:

- 1) improving the employees' understanding of the prevalence and harmfulness of discrimination and prejudices based on sex, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion;
- 2) acquainting employees with the direct and indirect nature of discrimination and the conditions under which it may occur and how it can be avoided;
- 3) acquainting employees with the current legislation and its application in the field of equal opportunities;
- 4) helping managers and employees to behave in a way that avoids violations of equal opportunities policies and legislation, as well as providing expertise in conflict resolution.

CHAPTER V DETERMINATION OF REMUNERATION AND PROMOTION

28. The remuneration of the University's employees is based on exclusively objective criteria related to the employee's qualifications, degree of responsibility undertaken by the

employee, the nature of work performed, related performance outcomes and other objective criteria set out in a separate document. When determining the salary, it is prohibited to take into account the employee's gender, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion.

29. All employees must be paid a salary calculated on the basis of the same criteria for the same or equivalent work regardless of the employee's gender, age, sexual orientation, social status, disability, race or ethnicity, religion, convictions or creed. The same work means work-related activities which, according to objective criteria, are the same or similar to other work-related activities to such an extent that the employees can switch their jobs at no cost increase to the employer. Equivalent work means that which, according to objective criteria, is no less qualified and no less important for the employer in achieving its operational objectives than other comparable work.

30. Promotion is linked to a person's abilities and the quality of the work performed and to their personal achievements in the professional field, and no employee may be discriminated against on grounds of sex, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, or religion.

31. Employee performance appraisals are conducted in accordance with and by applying the same criteria to all employees, regardless of their gender, race, nationality, language, origin, social status, creed, convictions or views, age, sexual orientation, disability, ethnicity, religion or other circumstances, which are not related to the employee's profession, performance of professional duties, professional achievements or personal performance.

CHAPTER VI

EMPLOYEE PROTECTION

32. The University shall take measures to ensure that employees are not harassed, sexually harassed or instructed to discriminate in the workplace, are not persecuted and are protected from hostile behaviour or adverse consequences if they file a complaint of discrimination or are involved in a discrimination case.

33. All University employees and candidates for vacancies who believe that their equal opportunities are violated or that they are discriminated against have the right to apply to

the President of the University and / or the Committee on Ethics and report on a person who allegedly violates their rights or discriminates against them.

34. Upon receipt of a complaint of an employee or a candidate for a vacancy regarding violation of equal opportunities or discrimination, the University shall immediately refer it to the University's Committee on Ethics, and, if need be, to the Office of the Equal Opportunities Ombudsman or other competent authority. All information about the complaint shall be considered confidential and shall not be disclosed to any persons who are not related to the alleged violation or its investigation.

35. During the investigation of an alleged violation, the University cooperates with the investigating institutions and provides all available information that is relevant to the investigation of an alleged violation.

36. Any persecution or hostile behaviour against an employee or candidate for a vacancy who has filed a complaint about discrimination or other violations of their equal opportunities is prohibited and is considered a breach of employment duties for which liability under the Labour Code of the Republic of Lithuania may apply.

CHAPTER VII

FINAL PROVISIONS

37. This procedure shall be reviewed and, if necessary, updated at least once a year or whenever there is a change in the mandatory legislation in the field covered by this policy.

38. Employees are acquainted with this policy by electronic means and must comply with the obligations prescribed in it and follow the principles set out in this policy when performing their work functions.

39. The University reserves the right to change this policy in whole or in part. Employees and other responsible persons shall be informed about the changes by electronic means.
