



APPROVED
by the Decision of the Board of
Lietuvos Energija UAB of 27
December 2016
Minutes of the Meeting No PR_2016-67

COMPLIANCE MANAGEMENT POLICY OF LIETUVOS ENERGIJA UAB GROUP OF COMPANIES

Objective: To regulate the compliance management principles of Lietuvos Energija UAB Group of Companies.

Scope: For the Companies of Lietuvos Energija UAB Group of Companies.

Concept of compliance and the principles of compliance management

1. Compliance within the Group is understood as the compliance of the activities of the Group and of the Companies with the Group's values, national legislation, European Union legislation and accompanying documents, and other guidelines and recommendations which are relevant to the activities of the Companies to ensure transparency and legitimacy of activities.
2. The compliance management (coordination) is based on the following key principles:
 - 2.1. **Compliance management is an integral part of the activities of the Companies.** Compliance management is a continuous and integral part of all Group processes and must be executed continuously.
 - 2.2. **Compliance management is dynamic and responsive to the activities of the Companies and / or of the Group.** Compliance management at Group level is conducted in accordance with section 4 of the present Policy. Where circumstances are identified in the internal and external environment that could potentially lead to a risk of non-compliance and this may cause damage to the Group and / or the Company, the priorities of the function may be reviewed during the year.
 - 2.3. **Independence of compliance management function.** Compliance management is self-contained activity that is independent of other functions. However, combining the compliance management function with other control functions of the same level (defence lines II) may be accepted provided that this does not result in a conflict of interest or does not compromise the effectiveness of the compliance management function.
 - 2.4. **Compliance management is carried out subject to proportionality to the objectives pursued.** Transparency and compliance with legislation are the objectives of the main compliance management functions. The proportionality of the measures must also be taken into account in pursuing these goals.
 - 2.5. **Responsibility.** Compliance is implemented by all employees of the Group, i.e. the employees of the Company themselves ensure compliance in the daily processes curated/implemented by them.