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| Title of the normative internal legal act | Abuse and harassment prevention policy of the Group |
| Title of the process | People and culture |
| Process owner (unit) | People Well-being, Diversity and Inclusion unit at AB "Ignitis grupė" |
| Approving company | AB "Ignitis grupė" |
| Approving person/body | Management Board of AB "Ignitis grupė" |
| Date of entry into force | 2023 02 22 |

ABUSE AND HARASSMENT PREVENTION POLICY OF THE GROUP

1. PURPOSE AND SCOPE

1.1. The purpose of the Policy is to provide and implement effective prevention measures in order to protect Employees from Abuse and Harassment and help employees clearly understand potential manifestations of Abuse and Harassment at work, recognise their signs and be aware of legal defence methods.

1.2. The Policy shall apply to all Group Companies.

1.3. The Policy shall apply to the Group Companies registered and operating abroad to the extent it does not contradict the provisions of legislation of the respective country.

2. TERMINOLOGY

2.1. General terminology described in the Glossary: Group, Company, Employee, Direct Manager.

2.2. **Abuse and Harassment** shall mean any inappropriate behaviour, including psychological abuse, abuse and harassment related to gender (abuse and harassment related to a person's gender or unproportionally affecting a specific gender, including sexual harassment) or a threat thereof, regardless if the inappropriate behaviour affecting a person physically, psychologically, sexually or economically occurs once or repeatedly, or such inappropriate behaviour leads to actual or potential impact on the person, or such behaviour undermines that person's dignity or creates an intimidating, hostile, degrading or offensive environment and/or results in actual or potential physical, material and/or non-material damage.

2.3. **Commission** shall mean a commission formed, in accordance with the procedure set out in the Rules of Procedure of the Commission of Inquiry, to investigate a specific potential violation of legal acts.

2.4. **Discrimination** shall mean direct and indirect discrimination, harassment, sexual harassment, instruction to discriminate on the basis of gender, race, nationality, ethnic origin, language, origin, social status, religion, faith, belief, convictions or views, age, sexual orientation, disability, state of health, family or marital status, membership in a political party or association or discrimination based on other grounds set out in the law.

2.5. **Emotional Support Line** shall mean a special number, which Employees of the Group Companies can call in order to receive a confidential consultation from a psychologist free of charge. This number shall be published on the Group's intranet.

2.6. **Employee Representatives** shall mean representatives of trade union(s) and work councils operating in the Company.

2.7. **Labour Code** shall mean the Labour Code of the Republic of Lithuania.

2.8. **Policy** shall mean the policy on Abuse and Harassment prevention, this document.

2.9. **Report** shall mean information about a violation of the Policy, which is likely to have been committed, is being committed or is anticipated, submitted in any form (orally, in writing, by phone or e-mail) according to the procedure set out in the Policy.

2.10. **Trust Line** shall mean a general description of means for submitting Reports of possible violations of the Policy.

2.11. **Well-being Mentors** shall mean Employees of Group Companies who are trained to provide emotional support, lead team discussions on well-being topics.

3. PROHIBITION AND METHODS OF RECOGNITION OF ABUSE AND HARASSMENT

3.1. Abuse and harassment shall be prohibited:

3.1.1. in the workplace, including public and private workplace when an Employee is at the employer's disposal or performs his/her obligations under his/her employment contract;

3.1.2. during rest and lunch breaks or when using utility, sanitary and hygiene facilities;

3.1.3. during work-related outings, trips, training, events or social activities;

3.1.4. during work-related communications, including communications via information and electronic technologies;

3.1.5. in an accommodation provided by the employer;

3.1.6. during commute to and from work.

3.2. Companies shall take measures to create a work environment where an Employee or a group of Employees do not experience hostile, unethical, degrading, insulting, offensive behaviour which would threaten the Employee's or the group of Employees' honour and dignity, adversely affect employee(s) physically or mentally, or behaviour intended to intimidate, belittle the Employee or a group of Employees or put him/her/them in a defenceless and helpless position.

3.3. The Companies shall not tolerate Abuse and Harassment at work and shall take any measures necessary to ensure Abuse and Harassment prevention as well as take active measures to support the persons who experienced Abuse or Harassment:

3.3.1. considering the potential dangers of Abuse and Harassment, they shall take the following elimination and/or control measures:

3.3.1.1. prepare a memo for Employees that would help them choose an appropriate form of behaviour after a conflict takes place;

3.3.1.2. introduce Employees to the internal legal acts governing the behaviour expected from Employees: the Group's Code of Ethics, Equal Opportunities and Diversity Policy, this Policy, etc.;

3.3.1.3. create an emotionally safe workplace culture, inform Employees about the importance of feeling good at work, ensuring work-life balance, emotional support provision at the Group Companies (Emotional Support Line, Well-being Mentors);

3.3.1.4. share information via internal communication channels about potential situations of psychological abuse, solutions, norms of behaviour preventing conflicts at work;

3.3.1.5. inquire about Employees' well-being, motivation, work environment during periodical meetings between Employees and their Direct Managers;

3.3.1.6. organise discussions in structural units where cases of Abuse and/or Harassment were identified, during which the inappropriate behaviour shall be discussed;

3.3.1.7. provide support to Employees who experienced Abuse and/or Harassment by encouraging them to contact the Emotional Support Line, Well-being Mentors, granting leave, transferring to a different workplace, etc.;

3.3.1.8. ensure the Employees who violated the provisions of this Policy are liable in accordance with the Labour Code, Rules of Procedure of the Companies and other legislation;

3.3.2. establish the procedure of submitting and examining the Reports on Abuse and Harassment and introduce it to the Employees;

3.3.3. organise trainings for Employees on the dangers of Abuse and Harassment, preventive measures, rights and obligations of Employees related to Abuse and Harassment.

3.4. Heads of Companies (and if the head of the Company was the one who engaged in Abuse and Harassment, the collegial body of the Company that appointed him/her) shall ensure that the received Reports on Policy violations or suspicion of potential violation are investigated, the prohibited behaviour is stopped, and the culprits are held accountable.

3.5. Employees must communicate with each other, solve various situations peacefully, treat colleagues in an ethical and respectful manner, and in case of conflicts or disputes, contact their Direct Manager, senior manager, personnel business partner or the Trust Line.

3.6. Violating this Policy may be treated as a material breach of employment obligations.

4. POTENTIAL FORMS OF ABUSE AND HARASSMENT

4.1. Potential forms of psychological abuse are the following:

4.1.1. direct or indirect threats or accusations, thus leading to emotional or physical pain or loss (for example, threatening to dismiss, to create harmful working conditions using work schedule, etc.);

4.1.2. dismissing achievements (for example, ungrounded criticism of an Employee regarding the performance of his/her tasks, thus humiliating, offending him/her, etc.);

4.1.3. slander (for example, disseminating false information which could damage person's honour and dignity, etc.);

4.1.4. ignoring (for example, isolating, separating a person from the colleagues without any grounds, refusing to share information, constantly ignoring, denying Employee's requests and needs, etc.);

4.1.5. manipulation (for example, an Employee is allocated unreasonable workload, is set impossible requirements, etc.);

4.1.6. mocking (for example, Employee or group of Employees are engaged in behaviour where personal or professional attributes of another person are presented for collective mockery, snide remarks or associative jokes are made about an Employee, or hostile and unethical environment is created where Employee is being insulted, humiliated, etc.);

4.1.7. shouting (for example, communicating with a raised tone, demonstrating uncontrolled emotions, etc.);

4.1.8. public humiliation (for example, humiliating comments about an Employee, comments used to humiliate, belittle, disparage, etc.);

4.1.9. insults destroying Employee's self-confidence, including public humiliation;

4.1.10. demeaning actions, statements or gestures directed towards Employee's self-esteem.

4.2. Potential forms of harassment are the following:

4.2.1. unacceptable or unwanted physical contact (for example, physical touch, caressing, spanking, grabbing, trying to touch (hug), draw closer to another person, etc.) or requesting such physical contact;

4.2.2. demonstrating or sending obscene content;

4.2.3. obsessive interest about Employee's private life, intimate relationships;

4.2.4. unsolicited comments about Employee's appearance, body, clothing;

4.2.5. offensive jokes, bullying, gossip, rumours, slander, offensive gestures, hate speech;

4.2.6. deliberate isolation of an Employee in a work environment;

4.2.7. collecting and/or disseminating information about an Employee that is not related to his/her work functions;

4.2.8. behaviour restricting person's freedom of self-determination;

4.2.9. exerting impact on an Employee to force him/her to perform specific functions (services) that are not related to his/her work.

4.3. The following shall not be considered as Abuse or Harassment:

4.3.1. criticism or comments related to an Employee regarding his/her work activities or when evaluating his/her performance if the criticism or comments were not expressed in degrading or offensive manner;

4.3.2. reasonable request of Employee to comply with the provisions of the employment contract, rules of procedure of work or requirements of other internal legal acts, etc.;

4.3.3. discussions arising from differences in opinions, points of view, if Employee is not being insulted or disparaged in the process.

5. PROCEDURE FOR SUBMITTING AND EXAMINING REPORTS ON ABUSE AND HARASSMENT

5.1. Investigation of Reports on Abuse and Harassment shall be based on the following key principles:

5.1.1. direct involvement – all persons involved (the affected, the accused and the witness(es) shall be given every opportunity to submit explanations for their behaviour);

5.1.2. effectiveness – Reports shall be examined in the shortest amount of time possible;

5.1.3. support to the affected – after receiving the Report on Abuse and Harassment, the affected Employee shall be provided with psychologically safe working conditions;

5.1.4. objectivity and impartiality – the investigation shall be carried out in an objective manner, without prejudice of circumstances;

5.1.5. innocence – the accused shall be assumed not guilty until a decision is made regarding the violation or his/her improper behaviour.

5.2. Reports on Abuse and Harassment may be submitted by Employees who suffered, witnessed it or who heard about it, also their Direct Managers, senior managers or Employee Representatives.

5.3. Employees may report on Abuse and Harassment or other potential violations of the Policy to his/her Direct Manager, Direct Manager of a person who suffered or who engaged in Abuse or Harassment, senior manager, personnel business partner, or contact the Trust Line in accordance with the procedure described in Paragraph 5.5 of the Policy.

5.4. After receiving information on Abuse and Harassment or another potential violation of the Policy, the Direct Manager, senior manager or personnel business partner shall initiate the investigation of the Report on Abuse and Harassment in accordance with the procedure for investigating violations of employment obligations set out in the rules of procedure of work.

5.5. Employees may submit Reports on Abuse and Harassment or other potential violations of the Policy in confidence and anonymously by the following means:

5.5.1. email pasitikejimolinija@ignitis.lt;

5.5.2. filling in a Trust Line report [form](#);

5.5.3. leaving a message in the voicemail of the Trust Line (tel. +37064088889);

5.5.4. sending a letter to AB “Ignitis grupė” at Laisvės Ave. 10, Vilnius. When sending a letter, please indicate “TO BE READ ONLY BY THE COMPETENT RECIPIENT”;

5.5.5. handing it directly to any employee of the Corporate Security functional area.

5.6. After receiving a Report on Abuse and Harassment via one of the means described in Paragraph 5.5 of the Policy, the Report shall be immediately registered in JIRA system, section “Verification of Trust Line reports”, the access rights to which shall be granted to an employee of Corporate Security functional area supervising the Trust Line, and an initial assessment of the received information shall be initiated.

5.7. The initial assessment and investigation of the received information shall be performed in accordance with the Group's Rules of Procedure of the Investigation Commission.

5.8. When carrying out the investigation of Reports on Abuse and Harassment and other potential violations of the Policy, the Employee Representatives of the Company whose Employee(s) have allegedly committed a violation, who are entitled to participate in the investigation in accordance with the procedure set out in the Rules of Procedure of the Investigation Commission of the Group, shall be informed thereof.

5.9. The Direct Manager, senior manager, personnel business partner or the responsible employee of Corporate Security functional area shall inform the Diversity, Inclusion and Well-being unit about all Employee Reports regarding potential Abuse and Harassment for monitoring purposes.

6. PROTECTION MEASURES OF PERSONS WHO REPORTED ON AND WHO SUFFERED ABUSE AND HARASSEMENT AND THE SUPPORT PROVIDED TO THEM

6.1. Employees who suffered Abuse and Harassment may contact the Emotional Support Line and receive a consultation from a psychologist as well as contact Well-being Mentors. In both cases Employees are guaranteed confidentiality.

6.2. Employees who suffered Abuse and Harassment may be provided with other support measures, i.e., granted leave, transferred to a different workplace, etc.

6.3. The Direct Manager or a senior manager, or Employee Representatives shall inform the Employee or a group of Employees about the support measures available in the Group Companies and shall initiate the provision thereof.

7. RULES OF EMPLOYEE BEHAVIOUR (WORK ETHICS)

7.1. Employees of the Group Companies shall observe the principles of behaviour specified in the Group's Code of Ethics and the Equal Opportunities and Diversity Policy of the Group. The Group encourages behaviour at the workplace that is based on the Group's values, respect and equal opportunities. Employees must honour human rights and freedoms, and have zero tolerance for any form of Discrimination, Abuse and Harassment or bullying.

7.2. Employees, after witnessing improper behaviour in respect of an Employee or a group of Employees, must not remain passive witnesses or justify, belittle or encourage such behaviour (by smiling, laughing or other indirectly supporting actions), but warn those involved immediately that their behaviour does not comply with the Group's Code of Ethics, the provisions of this Policy or other internal legal acts regulating norms of ethical conduct in the organisation, and may report it in accordance with the procedure set out in the Policy.

7.3. The Employee who was affected by improper behaviour with signs of Abuse and Harassment, must inform the person engaging in Abuse and Harassment that such behaviour is unacceptable and must be stopped, and that such behaviour may be reported in accordance with the procedure set out in the Policy.

8. OTHER INFORMATION RELATED TO PREVENTION OF ABUSE AND HARASSMENT

8.1. If the Employee who suffered Abuse and Harassment does not wish to report on it in accordance with the procedure set out in the Policy in order to start the investigation on the Abuse and Harassment, but wishes to discipline the Employee who engaged in Abuse and Harassment, the Employee who suffered Abuse and Harassment may contact his/her Direct Manager, senior manager or personnel business partner in order to apply the following measures:

8.1.1. have informal conversation with the Employee who had engaged in Abuse and Harassment, which will be moderated by the Direct Manager of the Employee or another senior manager. If necessary, the conversation can involve a psychologist or a Well-being Mentor;

8.1.2. have a discussion organised by a Well-being Mentor or a psychologist in a structural unit where Abuse or Harassment took place or improper behaviour was observed in order to discuss the problematic behaviour with Employees and prevent it from happening in the future.

9. FINAL PROVISIONS

9.1. The Policy shall be approved and amended by the decision of the Management Board of AB "Ignitis grupė".

9.2. Diversity, Inclusion and Well-being unit of AB "Ignitis grupė" shall be responsible for preparing and revising the Policy.

9.3. Head of Group Business Resilience of AB "Ignitis grupė" shall be responsible for implementation of the procedure of submitting and examining Reports established in the Policy, and the Head of

Diversity, Inclusion and Well-being shall be responsible for implementation of Abuse and Harassment prevention measures. The heads of the Companies shall be responsible for implementation of the Policy at the Companies.

9.4. The Policy shall be revised in accordance with the Reports received on Abuse and Harassment or identified cases of Abuse and Harassment should the potential dangers thereof change or there are new dangers identified, or if requested by a labour inspector of the State Labour Inspectorate of the Republic of Lithuania.

9.5. Before making a decision on the approval or amendment of the Policy, the Policy and/or its amendments shall be coordinated with Employee Representatives (work councils and/or trade unions operating in the Companies). Employee Representatives shall be periodically informed about the progress of implementation of the Policy in accordance with the procedure set out in the Labour Code and collective agreements concluded with the Companies. Employees of the Companies shall be introduced to the Policy using the document management system "Operations Manual".

9.6. The Policy shall be made publicly available on the Group's website www.ignitisgrupe.lt.

10. RELATED LEGAL ACTS

10.1. The Labour Code of the Republic of Lithuania;

10.2. The Group Code of Ethics;

10.3. The Group Equal Opportunities and Diversity Policy;

10.4. The Group standard for implementing internal communication channels for reporting violations and their functions;

10.5. Rules of Procedure of the Investigation Commission.