

Normative internal legal act	<b>Anti-Corruption Policy of the Group</b>
Process name	Management of anti-corruption controls
Approved by	AB Ignitis Group
Process owner (unit)	Group Business Resilience
Approving person / body	Ignitis Group AB Board
Decision number and approval date	Decision No PR_2022-50 of 16-08- 2022
Enforcement date	16-08-2022

## ANTI-CORRUPTION POLICY OF THE GROUP

### 1. PURPOSE AND SCOPE

- 1.1. The Anti-Corruption Policy of the Group (hereinafter – the Policy) is the main document setting out the principles and obligations of creating a transparent environment for the Group of companies of AB Ignitis Group (hereinafter – the Group), the implementation, supervision and control of the Policy.
- 1.2. The Policy shall apply to all employees of the Group, as well as to members of the management and supervisory bodies and committees of the Group companies, persons acting under civil contracts, retained consultants, intermediaries and other persons acting on behalf of entities that belong to the Group, irrespective of the form of the relationship and the nature of the remuneration (***Principle of Universal Obligation***).
- 1.3. The Group conducts its activities in accordance with the highest standards and principles of ethics, being guided by the principles of transparency, integrity and ethical conduct. The Group seeks to ensure that all its business partners comply with requirements of this Policy.

### 2. DEFINITIONS

2.1. Terms used in the Policy:

- 2.1.1. **Anti-Corruption Management System (ACMS)** – means the anti-corruption management system implemented in the Company the requirements of which are fully implemented in the Company and applied to other Entities to the extent provided for by legal acts regulating individual ACMS processes and by separate instructions of the Company to the Entities.
- 2.1.2. **Company** – means AB Ignitis grupė, legal entity code 30184404444.
- 2.1.3. **Employee** – means the person who works with the Entity of the Group under an employment contract. The Policy shall apply to the other persons referred to in paragraph 1.2 hereof as to Employees, unless otherwise stated in the Policy.
- 2.1.4. **Gift** – means any asset, right or service given or received without consideration. The concept of “gift” shall include tangible objects and other types of benefits that can be valued in monetary terms, e.g., goods, services, entertainment, discounts, gift vouchers, loans, invitations to events, hospitality and entertainment, etc.
- 2.1.5. **Group** – means the Company and legal entities directly and indirectly controlled by it.
- 2.1.6. **Ethics Code of the Group** – means the Code of Ethics of AB Ignitis Group.
- 2.1.7. **Conflict of interest** – means a situation where an employee, who, in performing the official duties or carrying out the assignment, must take or participate in taking the decision, or carry out the assignment that are also related to his (her) private interests.
- 2.1.8. **Entity** – means any entity of the Group other than the Company.
- 2.1.9. **Corruption** – means the abuse of powers for own or other persons’ benefit, to the detriment of the interests of the State or individual natural or legal persons.
- 2.1.10. **Nepotism** – means using one’s position to patronize relatives or friends.
- 2.1.11. **Facilitation payment** – means low-value unofficial payments made in connection with the performance of a normal routine task that the Company or the Entity should/could receive under the law.

- 2.1.12. **Stakeholders** – means natural or legal persons and groups of such persons or institutions affected or likely to be affected by the Group’s activities (e.g., shareholders, suppliers of goods, providers or recipients of services, etc.).
- 2.1.13. **Business Partner** – means an external party (customers, consumers, outsourced contractors, consultants, subcontractors, suppliers, vendors, advisors, consultants, agents, distributors, representatives, intermediaries, investors, etc.) with whom the Company or the Entity has or intends to enter into a particular business relationship.
- 2.1.14. **Business security** – means a functional area within the Group that carries out corruption prevention and monitors national security interests, physical security and security of information (content).
- 2.2. Other terms used in the Policy shall have the meaning assigned to them by the Criminal Code of the Republic of Lithuania, the Republic of Lithuania Law on Prevention of Corruption and other legal acts.

### **3. GENERAL PROVISIONS**

- 3.1. The Group has in place the certified ACMS to support the effective prevention of corruption, to prevent corruption or to facilitate the detection of the cases of corruption.
- 3.2. The Group designs and implements corruption prevention measures and assesses the implementation of corruption resilience requirements.
- 3.3. In order to continuously improve the Anti-Corruption Management System, the Group regularly monitors the implementation of anti-corruption measures and assesses the effectiveness of the anti-corruption policy.
- 3.4. The Group conducts corruption risk assessment aimed at preventive identification of risks (including corruption risks), i.e. their identification before they occur through the establishment of preventive risk management measures to avoid or minimise the identified risks to the acceptable level.
- 3.5. The Group creates the transparent, corruption-resilient environment in accordance with requirements of the Anti-Corruption Management System, the Code of Ethics, provisions of this Policy and other legal acts (***Principle of Legality***).
- 3.6. In the event of any conflict between this Policy and other legal acts, the provisions of the legal acts shall prevail.
- 3.7. Where the Policy, laws or regulations do not prescribe the appropriate standards of conduct, the Group undertakes to behave in the manner consistent with the highest standards of trustworthiness, integrity and transparency acceptable to the society.

### **4. COMMON PRINCIPLES AND COMMITMENTS FOR CREATING A TRANSPARENT ENVIRONMENT**

#### **4.1. General principles for creating a transparent environment**

- 4.1.1. The Group operates on the ***Principle of Zero Tolerance for Corruption***, i.e. the Group does not tolerate any form of corruption or corrupt practices, including, but not limited to, forms of corruption such as bribery, graft, influence peddling, facilitation payments, or any other practices committed for the purpose of soliciting or requesting a bribe, bribery, influence peddling, facilitation payment, or for concealing the commission of such practices of corruption. This principle shall apply in relations with both public and private sectors.
- 4.1.2. All Employees must avoid nepotism.
- 4.1.3. The Group does not tolerate illegal lobbying.
- 4.1.4. All employees of the Group must carry out their duties in good faith, without taking advantage of their position for personal gain or for the benefit of their close persons, and without otherwise

engaging in activities that are detrimental to the interests of the Group or to the public interest (***Principle of Avoidance of Conflicts of Interest***).

- 4.1.5. The Group's business partners and other parties that maintain relations with the Group's entities must also base their activities on the principles of ***Ethical and Responsible Business Conduct***, and comply with the anti-corruption provisions set out in the applicable legal acts.
- 4.1.6. The Group ensures the disclosure and transparency of information and aims at making the Group's main documents available to the public while ensuring the adequate disclosure of information (***Principle of Business Transparency***). Notwithstanding this undertaking, the Group shall protect confidential information and information constituting a trade (production) secret, personal data of customers and other persons and shall not disclose such information to any person who has no right to access it.

#### 4.2. Management of interests

- 4.2.1. The Group's business decisions and actions shall be based on the ***Principles of Mutual Trust, Objectivity, Impartiality, and Primacy of Public Interests***. Employees must avoid any conflict of interest that could adversely affect the impartial and objective performance of their duties and functions. In the performance of their duties, employees undertake not to seek personal gain for themselves or for their relatives.
- 4.2.2. The Group has in place the internal Procedure for the Declaration of Private Interests of Employees, which regulates the obligation of Employees to declare their private interests, and has established the process for suspension and recusal from decision making.
- 4.2.3. The Employee who is exposed to a situation which may give rise to a Conflict of Interest, or who becomes aware of any potential Conflict of Interest in the activities of other Employees, must report this to his (her) line manager and the Business Security Officer.
- 4.2.4. Work equipment, financial and material resources, internal and confidential information shall be used only for the direct performance of current duties, unless other use is expressly regulated in writing.

#### 4.3. Gifts, hospitality and other benefits

- 4.3.1. Within the Group, we refuse to provide any Gifts to business partners, except where required by customary international protocol practice (***Zero Gifts Policy***).
- 4.3.2. The Group does not tolerate any Gifts or hospitality that could be construed, directly or indirectly, as rewards, influence or patronage. For the sake of clarity, only symbolic business Gifts customary in business practice are accepted. Gifts accepted, returned, given shall be recorded in the manner set out in the internal regulations of the Group.
- 4.3.3. Employees shall be prohibited from soliciting, directly or indirectly, gifts and/or hospitality from interested parties and business partners.

#### 4.4. Provision of support

- 4.4.1. The Group shall refrain from any form of influence, whether direct or indirect, and does not fund or otherwise support politicians, political parties / movements, their representatives or their candidates, election campaigns, foundations or other organisations set up by politicians (or their related persons).
- 4.4.2. The Group shall provide support only on the basis of legal acts regulating the provision of support and in accordance with the Group's rules on the provision of support.

#### 4.5. Relations with foreign officials

- 4.5.1. Employees working with officials of foreign countries or operating in foreign countries must adhere to the principles of zero tolerance of corruption and to the provisions set out in the Policy,

regardless of whether or not the foreign country has provisions for liability for acts of a corrupt nature.

## **5. IMPLEMENTATION, MONITORING AND CONTROL OF THE POLICY**

- 5.1. Members of the supervisory and/or management bodies of the Company and Entities, heads of structural units shall, by their conduct, shape the standard of conduct set out in the Policy, ensure that activities in the areas of their responsibility are carried out in accordance with provisions of this Policy.
- 5.2. The heads of the Company, Entities and their structural units are responsible for ensuring that the Policy and internal legal acts of the Group implementing it are properly communicated to the Employees or other accountable persons, and that their content is clearly and understandably disclosed (e.g., periodic training, training for new employees, etc.). It is the responsibility of every manager – the day-to-day implementation of the Policy, communicating it to Employees and shaping appropriate behaviour.
- 5.3. In order to ensure the effective creation of an anti-corruption environment and the timely implementation of the Policy, the Business Security shall periodically organise training and consultations for Employees. This is aimed at raising the anti-corruption awareness among Employees, encouraging their involvement in the activities designed to create the anti-corruption environment. Business Security personnel shall be responsible for designing, implementing and organising the training programme.
- 5.4. Employees shall be encouraged to report any observed, suspected and/or possible cases of corruption and other violations of this Policy. Employees are encouraged to report any observed, suspected and/or possible cases of corruption and other violations of this Policy. Such reporting may be made to the Employee performing Business Security functions, the Helpline at +370 640 88889, or by email at [pasitikeijmoliniija@ignitis.lt](mailto:pasitikeijmoliniija@ignitis.lt) or by filling in the report [form](#). Reporting by other interested parties is also encouraged via the Helpline contacts.
- 5.5. In all cases, the anonymity of the whistleblower, the security of the person and the information shall be ensured and measures shall be taken to protect whistleblowers from any adverse consequences of violations of the Policy. The Business Security shall ensure full confidentiality, protection of personal identity, in line with the relevant legal acts.
- 5.6. The Business Security shall ensure that all potential breaches of the Policy are dealt with appropriately and by authorised and competent persons.
- 5.7. If any signs of criminal activity are detected, the Group shall notify the relevant law enforcement bodies.
- 5.8. Violation of provisions of this Policy shall be considered as a serious breach of employment obligations, which may entail the consequences set out in the Labour Code of the Republic of Lithuania, including but not limited to the termination of employment on the initiative of the employer for the employee's fault.
- 5.9. Cases of breach of the Policy shall be disclosed through the Group's internal communication channels, ensuring the protection of personal data.

## **6. FINAL PROVISIONS**

- 6.1. All existing and newly recruited Employees must familiarise themselves with the Policy and comply with its requirements.
- 6.2. Persons representing the interests of the Company or Entity or acting on behalf of the Company or Entity, even if they are not Employees, must also be familiar with the Policy and undertake to comply with its provisions.
- 6.3. Information on the implementation of the Policy and the ACMS is provided in the Social Responsibility Report of the Company and the Group. The Social Responsibility Report may be audited by an independent audit company.

- 6.4. The Policy is published on the Company's website.
- 6.5. The Policy and its amendments shall be approved by the Board of the Company.

## **7. RELATED LEGAL ACTS**

[Republic of Lithuania Law on Prevention of Corruption](#)  
[Code of Ethics of Ignitis Group](#)