

Approved by the Management Board of AB "Ignitis grupė"

Entered in to force: 17 / 02 / 2026

Code Owner – Group Sustainability

The Group Code of Ethics and Conduct



1. PURPOSE AND SCOPE

The purpose of the Group Code of Ethics and Conduct (hereinafter – **the Code**) is to define the principles business ethics and norms of conduct followed by AB “Ignitis grupė” and the companies of its group (hereinafter – **the Group**), and to set expectations for the daily conduct of the Group's employees, members of management and supervisory bodies in their work environment and when acting on behalf of the Group, cooperating with all Group business partners and other stakeholders.

The Code shall apply to all Group Companies to the extent that it does not contradict the legislative requirements of the Republic of Lithuania, other countries where its companies are registered and operating as well as the European Union (hereinafter – the EU). All Group employees and members of management and supervisory bodies must follow it.

2. MINDSETS

All Group Companies act towards a single purpose – to create a 100% green and secure energy ecosystem for current and future generations. This purpose both defines our business direction and reflects our commitment to the society and the environment. To achieve this, we have established common mindsets to boldly take on challenges, seek new solutions, constantly evolve and focus on what creates the greatest value for society.

The mindsets form the foundation of our conduct and help us ensure that every action we take aligns with the interests of the organisation and society. Therefore, before we start listing specific principles and standards of ethical conduct, we want to share with you what unites and inspires employees working at the Group:

United by purpose	With a shared purpose, we focus not only on individual goals but also on the goals of our colleagues, the entire organisation and society.
Owning the challenge	The determination to take proactive ownership with a can-do approach, driving results that matter.

Pursuing excellence	We focus our attention and efforts on creating the best value for customers and society. We ensure high quality where we make a meaningful impact.
Passion for reinvention	A proactive drive to embrace learning, adopt new technologies and innovations, and transform business models to foster growth and competitiveness.

These four mindsets provide a solid foundation for the principles and standards of ethical conduct we describe below, ensuring that all our actions meet both internal and external expectations and contribute to our common purpose.

3. LEGAL BASIS

This Code has been prepared in accordance with the laws of the Republic of Lithuania (hereinafter – RL), including, but not limited to, the laws on Equal Opportunities, Legal Protection of Personal Data, Prevention of Corruption, Adjustment of Public and Private Interests, the Labour Code and its implementing legislation as well as EU legislation and/or its implementing legislation in the RL (occupational health and safety, prevention of money laundering, competition, data protection, artificial intelligence, environmental protection and sustainability, etc.), as well as in accordance with international standards and best practices, including, but not limited to, the International Labour Organization Conventions, including Nos. 100, 111 and 155, the Universal Declaration of Human Rights, the United Nations (hereinafter – the UN) Guiding Principles on Business and Human Rights; the UN Convention against Corruption, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the OECD Recommendations on Artificial Intelligence.

The Code applies in conjunction with Group policies such as Anti-Corruption, Environmental, Remuneration, Occupational Health and Safety, Information Security, Equal Opportunities and Diversity, Abuse and Harassment Prevention, Sustainability, Human Rights policies, the Supplier Code of Ethics and other internal legal acts. The Code serves as a common framework for responsible, transparent and ethical management of our activities. The Group's operational documents relevant to the application of the Code are available on the Group's [website](#).

4. GROUP ETHICAL PRINCIPLES AND STANDARDS OF CONDUCT

4.1. RESPECT AND EQUAL OPPORTUNITIES

Respect for human rights

The Group respects and protects the rights and dignity of every person. The Group aims to ensure that its activities, decisions and relationships with business partners do not involve human rights violations, including forced labour, child labour or any form of violence, harassment or discrimination. The Group promotes a culture of respect, inclusion and equality in all its activities.

Diversity and equal opportunities

The Group promotes employee diversity and provides equal opportunities for all, regardless of age, gender, race, nationality, language, origin, social status, religion, beliefs, sexual orientation, gender identity, disability, ethnic origin, religion or other characteristics protected by law.

Discrimination prevention

No form of discrimination, harassment, bullying or abuse will be tolerated. The Group ensures that employees who report violations are protected from negative consequences or retaliation.

Fair employment relations

The Group's criteria used in all its processes related to recruitment, employment, termination of employment and remuneration are based on fairness, equality and transparency. The Group ensures that same - or same-value-creating work is compensated equally throughout the organisation.

Respect

Respect-based relationships and support from colleagues are the foundation of the Group's work culture. Guided by these principles, the Group strives to ensure that every team member feels valued and supported.

- We treat everyone as we would like to be treated ourselves – without discrimination or prejudice.
- We do not tolerate harassment, bullying, derogatory comments, or any form of violence, and we do not engage in such behavior ourselves.
- We always report if we experience or notice inappropriate behaviour.
- We value people for their competencies, skills and results – we ensure that everyone is paid equally for the same or equivalent work.

OUR CONDUCT

4.2. A CULTURE OF OCCUPATIONAL SAFETY AND GROWTH

Health and safety

The Group undertakes to ensure that the highest health and safety standards are followed in all countries, where it operates. It is proactively creating a safe working environment and taking preventive measures to protect the life and health of employees, partners and members of the public. It uses only reliable technologies and does not tolerate inappropriate or unsafe behaviour.

Employee wellbeing and resilience

The Group encourages employees to own the challenge and pursue excellence. This requires resilience, which is strengthened by focusing on common goals, mutual support and growing together. By taking care of the wellbeing of its employees, the Group empowers them and supports them where it is most needed.

Learning and cooperation

The Group's culture is based on constant learning, cooperation and openness. Sharing experiences, boldly asking for help, offering solutions and recognising mistakes as opportunities for improvement rather than pointing fingers is highly encouraged. The Group is creating an environment, where everyone feels supported, heard and valued both professionally and personally.

OUR CONDUCT

- We do not work under the influence of alcohol, drugs or other psychotropic substances.
 - We only use safe and reliable work equipment and comply with all health and safety instructions and preventive measures.
 - If we notice a situation that poses a threat to health, safety or the environment, we respond immediately. We exercise our right to stop work and report it to our manager or the person in charge.
 - We always respect and support our colleagues and partners. We offer help, especially when our colleagues are facing difficulties or experience emotional stress.
 - We promote psychological wellbeing and care for mental health. We talk openly about challenges, seek help and maintain an open dialogue.
- We take care of our physical and emotional resilience. We maintain a healthy work-life balance so that we can operate sustainably and have energy.
 - We are constantly growing and sharing our knowledge and experience with others. We boldly ask questions and seek help when needed.
 - We do not hide our mistakes but acknowledge them and learn from them so that they do not happen again.

4.3. OPEN AND FAIR CONDUCT IN THE MARKET

Fair competition and business practice

The Group strives to achieve a fair competitive advantage through innovation, quality and reliability. It carries out all purchase and sale transactions in a transparent and responsible manner, in accordance with established procedures, while ensuring the effective use of resources and accountability for every decision. The Group selects its partners based on the principles of legality, reliability, equality, proportionality and non-discrimination as well as based on shared values. The Group does not engage in activities or enter into business relationships with business partners who are directly included in the international sanctions lists established by the EU or other international organisations of which Lithuania is a member, or by countries cooperating with Lithuania (the United States, the United Kingdom), or who are directly or indirectly controlled by such persons.

Zero tolerance for corruption

The Group does not tolerate bribery, influence peddling, facilitating payments, conflicts of interest, illegal agreements with competitors or abuse of a dominant position. The Group responsibly manages conflicts of interest, gifts and hospitality and strives to ensure that all persons and partners acting on its behalf adhere to the same high transparency and integrity standards.

Responsibility and transparency

The Group protects confidential and inside information and prohibits its use for personal gain or market manipulation. The Group ensures that persons acting on its behalf immediately inform the competent authorities if they notice any actions that lack transparency or possible criminal activities.

Accountability and professionalism

The Group reports to shareholders, the public and supervisory authorities in accordance with international financial and non-financial reporting standards. Persons acting on behalf of the Group ensure professional conduct, take care of its reputation and build confidence in the Group while behaving in an ethical and responsible manner at every step.

- We understand our position and declare our private interests in a responsible manner, avoid conflicts of interest, and recuse ourselves when necessary.
- We adhere to competition rules, do not seek to gain an advantage through unfair means and do not enter into agreements with competitors.
- We carry out purchase and sale transactions in accordance with established procedures, use funds responsibly and supervise the performance of contracts.
- We only work with partners who follow the law, international standards and share our values.
- We do not conduct business with partners who are on international sanctions lists.
- We do not tolerate corruption, nepotism, cronyism, bribery, preferential treatment or undue influence and we understand the financial and reputational damage such actions can cause.
- We do not disclose confidential or inside information, use it for personal gain or publish misleading information.
- We conduct transparent and legal activities and provide clear, accurate and timely reporting in accordance with international standards.
- We only speak publicly to the extent we are authorised. We protect the organisation's reputation on social media and in the public eye.
- We understand that every employee represents the Group. With this in mind, we act consciously both during and after work.

OUR CONDUCT

4.4. RESPONSIBLE MANAGEMENT OF RESOURCES, THE ENVIRONMENT AND TECHNOLOGY

Responsible energy consumption and environmental protection initiatives

The Group promotes responsible energy consumption and sustainable mobility, cooperates with the public and actively participates in environmental initiatives, thereby strengthening stakeholder confidence in the Group, creating long-term value and ensuring sustainable energy development in the future.

Environmental commitments

The Group promotes efficient and responsible use of resources to ensure that they serve the common goal and interest for as long as possible. It complies with environmental standards and contributes to the international climate goals set out in the Paris Agreement and the Green Deal. The Group reduces its environmental impact by developing green capacities, investing in sustainable infrastructure, implementing smart and less-polluting solutions, managing waste responsibly and applying measures to promote the circular economy and preserve biodiversity.

Data protection and privacy

The Group respects individual's privacy and ensures that personal data is processed lawfully, transparently and securely, and that related information is adequately protected.

Ethics of artificial intelligence

When using artificial intelligence solutions at work, the Group ensures that the artificial intelligence solutions are developed and applied in an ethical, transparent and non-discriminatory manner and with respect for human rights. It always strives to ensure that technology enhances human decisions rather than replacing them, while maintaining accountability, security and data protection. The Group uses artificial intelligence only for clearly defined purposes, in accordance with legislation and the organisation's values, while ensuring that decisions are always made responsibly and reasonably.

- We handle the Group's information available to us responsibly, protect confidential information, ensure data protection and respect the privacy of every individual.
- We use the Group's resources responsibly and ensure that they serve the common goal.
- We conserve the environment, reduce our negative impact on the climate and support sustainable development of the energy sector.
- We use artificial intelligence responsibly and transparently. We ensure the security of the organisation's data, protect human rights and prevent discrimination.

OUR CONDUCT

4.5. ENABLING AND PROTECTING PARTNERSHIPS

Innovations and partnerships

The Group combines innovation and long-standing experience to create value for society, maintain energy independence and promote responsible cooperation on a global scale. It ensures that internal and external, national and international partnerships are transparent, inclusive and based on mutual respect and accountability.

Political neutrality

The Group does not participate in political activities, does not support political parties or organisations and does not seek any support from them. Group employees are free to participate in political activities, but this is their personal initiative and is not related to the Group's activities or responsibilities. The Group participates in legislative processes transparently, submits constructive proposals and positions on legislation that may affect its activities, employees, customers and shareholders being submitted in accordance with the procedure established by law, avoiding any undue influence.

Cooperation with authorities

The Group cooperates with supervisory and other authorities in an open, respectful and responsible manner. It responds to their inquiries in a timely manner, ensures that the necessary information is provided and participates constructively in inspections or supervisory processes.

Dialogue with communities

The Group maintains active dialogue with communities and non-governmental organisations, provides transparent reports on its activities and contributes to social development and the creation of common welfare. It encourages employees to volunteer and engage in civic initiatives, thereby strengthening social ties and creating trust-based partnerships.

- We present our proposals on legislation in a transparent and responsible manner, avoiding any undue influence or pressure on decision-makers.
- We cooperate with supervisory authorities in an open and respectful manner and provide all the necessary information in a timely manner.
- We maintain dialogue with communities and non-governmental organisations, share information and report on our activities.
- We contribute to the welfare of society, support social initiatives and encourage employee volunteering.

OUR CONDUCT

- We do not participate in any political activities on behalf of the Group and do not associate our personal political views with the Group's activities.

5. IMPLEMENTATION AND MONITORING

The Code Owner shall be responsible for preparing and revising it, consulting on its application and monitoring the implementation of the Code. The Code Owner shall also be responsible for organising periodic training sessions aimed at strengthening the culture of ethical conduct within the Group, testing knowledge and summarising the results. The Code Owner shall prepare and approve a standard governing the implementation of and compliance with this Code applicable to all Group companies.

Heads of Group Companies and Functions shall be responsible for the proper implementation and enforcement of the Code therein.

The following flowchart shall be followed:



A breach of this Code may be considered a serious violation of employment obligations.

Employees who observe violations of the Code shall immediately report them to their direct manager, the Code Owner, or via the Group’s internal whistleblowing channel (the Trust Line). Information on reporting methods and procedures is published on the Group’s [website](#).

The Code is published publicly on the Group’s website www.ignitisgrupe.lt.

6. TERMS AND ABBREVIATIONS

Employee	A person working at a Group Company under an employment contract.
Green Deal	On 11 December 2019, the European Commission presented a roadmap aimed at making Europe the first climate-neutral continent by 2050, boosting the economy, improving people's health and quality of life, caring for nature and leaving no one behind.
Cronyism	Favouritism toward friends.
Nepotism	Favouritism toward relatives.
Paris Agreement	An agreement between countries to strengthen the global response to the threats posed by climate change. The aim is to limit the increase in average global temperature to 2°C above pre-industrial levels and to pursue efforts to limit the increase to 1.5°C above pre-industrial levels.
Business partner	An external party (customers, consumers, external contractors, consultants, subcontractors, suppliers, sellers, advisers, agents, distributors, representatives, intermediaries, investors, etc.) with whom a Group Company has or intends to have business relations.