

Approved by the Management Board of AB "Ignitis grupė"

Effective as of: 04 / 02 / 2026

Policy owner – Group Sustainability

# The Group Human Rights Policy



## 1. PURPOSE AND SCOPE

1.1. **The purpose of the policy** is to establish common human rights principles and commitments, and to ensure they are implemented by organising, planning, executing and assessing the activities of AB “Ignitis grupė” group of companies (the “Group”).

1.2. **The Policy shall apply** to all Group Companies to the extent that it does not contradict the legislative requirements of the Republic of Lithuania, the European Union (EU) and other countries where the Group Companies are registered and operating.

1.3. The Policy is aligned and integrated with other Group policies that address human rights matters, ensuring a consistent and comprehensive framework.

## 2. HUMAN RIGHTS PRINCIPLES

2.1. The Group commits to respect human rights and uphold internationally recognised human rights principles as defined in the following universally recognised documents:

- International Bill of Human Rights, adopted by the United Nations (UN), comprises the [Universal Declaration of Human Rights](#) (1948), the [International Covenant on Civil and Political Rights](#) (1966), and the [International Covenant on Economic, Social and Cultural Rights](#) (1966). Together, they establish universal standards for civil, political, economic, social, and cultural rights, forming the foundation of international human rights law.
- [Guiding Principles on Business and Human Rights of the UN](#), adopted on 2011 by the UN Human Rights Council, establish three key pillars: the state duty to protect human rights, the corporate responsibility to respect human rights and provide access to effective remedies.
- [International Labour Organisation \(ILO\) conventions](#) are agreements designed to establish fundamental labour rights, including non-discrimination, prohibition of forced and child labour and the right to join trade unions.
- [ILO Declaration on Fundamental Principles and Rights at Work](#) adopted in 1998 and amended in 2022, is an expression of commitment by governments, employers' and workers' organizations to uphold basic human values – values that are vital to our social and economic lives.
- [The Organisation for Economic Co-operation and Development Guidelines for Multinational Enterprises on Responsible Business Conduct](#) promote

responsible and transparent business conduct in the entire supply chain, including human rights, labour standards, environmental, anti-corruption and consumer protection principles.

- [Charter of Fundamental Rights of the EU](#) defines and protects the fundamental rights and freedoms people enjoy in the EU in order to protect human dignity, freedoms, equality, solidarity and justice in the entire EU.

2.2. The Group aims to manage significant human rights impacts identified in its core value chains by conducting ongoing human rights impact assessment.

2.3. The Group aims to implement its human rights commitments by working with all stakeholders, including employees, business partners, and communities.

2.4. The Group's expectations of its suppliers in relation to human rights are set out in the [Ignitis Group Supplier Code of Ethics](#). The Group also expects its suppliers to encourage their own business partners involved in their supply chains.

## 3. HUMAN RIGHTS AREAS

The Group identifies the following key areas of human rights: labour practices, data protection and privacy, environmental protection, and community wellbeing.

### 3.1. EMPLOYEMENT PRACTICES

#### 3.1.1. Non-discrimination and equal opportunities

The Group commits to not tolerate any form of discrimination, direct or indirect, in any area of its activities. The Group shall undertake to create an inclusive working environment based on respect, where every employee has equal opportunities to grow, improve and be valued irrespective of their gender, age, nationality, religion, disability, sexual orientation, gender identity or other aspects of their personal identity.

[The Group Equal Opportunities and Diversity Policy](#) defines the key principles that guide its efforts to promote diversity, ensure equal opportunities for all Group employees, and continuously monitor the implementation of these principles.

#### 3.1.2. Abuse and harassment prevention

The Group commits to ensure a working environment free from any form of abuse or harassment. In order to protect its employees, the Group shall endeavour to prevent inappropriate physical, psychological or sexual behaviour. [The Group Abuse and Harassment Prevention Policy](#) establishes zero tolerance for manifestations of abuse and harassment by setting out preventive measures to protect employees from abuse and harassment, helping them to clearly

understand the signs of such behaviour at work, the limits of responsibility and the course of action in cases of inappropriate behaviour.

### 3.1.3. Occupational health and safety

The Group commits to ensure a safe and healthy working environment as a fundamental human right. This commitment aims to prevent work-related injuries and occupational illnesses and to support the overall well-being, dignity, and productivity of employees.

Occupational health and safety are an integral part of the [Group's strategy](#) and management systems, with clear objectives and measures in place to identify, assess, and mitigate risks related to work activities.

The Group does not tolerate unsafe working conditions or practices and expects full compliance with applicable occupational health and safety legislation and internal requirements.

[The Group Occupational Health and Safety Policy](#) sets out the principles and framework for embedding a strong health and safety culture across the Group, promoting consistent application of good practices, transparency, and continuous improvement.

### 3.1.4. Remuneration and other working conditions

The Group commits to ensure fair and competitive working environment, including right to equal remuneration for the same or equivalent work of equal value, fair and just working conditions, working hours and rest periods and additional benefits.

The Group shall create favourable conditions for employees to balance their family and work commitments by offering various measures that promote work-life balance.

[Remuneration Policy](#) ensures the transparency, internal fairness and external competitiveness of the remuneration system.

### 3.1.5. Right to join associations and right to collective bargaining

The Group commits to promote and support constructive social dialogue with employee representatives while respecting their right to form associations, engage in collective bargaining and lawful protests. Participation in trade unions shall not serve as grounds for discrimination or retaliatory actions.

These principles are set out in the [Group People and Culture Policy](#), which, among other things, aims to promote and maintain social dialogue with employee representatives.

### 3.1.6. Forced labour

The Group strongly opposes all forms of forced labour and all manifestations of slavery, including modern slavery. Employment practices within the Group comply with the ILO Convention including [No. 105](#) and uphold the Employer pays principle, ensuring that no worker pays recruitment fees or related costs for employment. All recruitment expenses are borne by the employer to prevent debt bondage and protect workers from exploitation.

### 3.1.7. Child labour

The Group commits to ensure the abolition of all forms of child labour as defined in ILO Convention including [182](#).

### 3.1.8. Ethics of artificial intelligence

The Group commits to create, install and use artificial intelligence (AI) solutions in a responsible manner while ensuring that they are ethical, transparent and respect human rights. All AI solutions shall be based on the principles of fairness, non-discrimination, data protection and responsibility that align with international standards and good practice.

### 3.1.9. Just transition

The Group commits to ensure that the transition to a green economy is socially just and leave no vulnerable social groups or employees behind. The Group shall strive for the transition to be based on inclusion, social dialogue and economic security while ensuring adequate support for employees during the transition period. This principle enables employee upskilling, improving their qualifications, reskilling and taking advantage of social protection measures that will help them adapt to the changes and remain in the labour market.

## 3.2. DATA PROTECTION AND PRIVACY

3.2.1. The Group commits to respect every person's right to personal data protection and privacy.

3.2.2. The Group commits to process information and personal data relating to employees, customers and other persons in a responsible and lawful manner. The main data protection principles are set out in the [Group Personal Data Protection Policy](#).

### 3.3. ENVIRONMENTAL PROTECTION

3.3.1. The Group recognises that a clean, healthy, and sustainable environment is an essential component of human rights and commits to preventing, reducing, and mitigating its environmental impacts in a responsible and transparent manner.

3.3.2. The Group commits to comply with applicable environmental legislation, applying internationally recognized standards and best practices, and supporting the achievement of the United Nations Sustainable Development Goals, in line with the principles set out in the [Group Environmental Policy](#).

3.3.3. The Group seeks to minimize its contribution to climate change, protect nature and biodiversity, and promote the efficient and responsible use of natural resources, taking into account the needs of present and future generations.

### 3.4. COMMUNITY WELL-BEING

3.4.1. The Group shall commit to engaging with local communities, including vulnerable groups and indigenous peoples, while minimising negative impacts and strengthening trust-based [The Group Community Engagement and Relations Management Guidelines](#) ensure that communication and partnerships with communities are based on the Group's mindsets, strategic goals and mutual benefit.

## 4. HUMAN RIGHTS DUE DILIGENCE

4.1. The Group commits to regularly and systematically identify, assess and manage human rights risks and adverse impacts by applying a risk-based approach in human rights areas where, upon identification of higher risk, a due diligence process is applied. The Group shall strive to ensure that this process covers the main value chains of the Group and is integrated into key business decision-making and management processes.

4.2. The human rights due diligence shall include the following key stages:

- assessing risks to identify in advance any potential or existing negative impact on human rights in the Group's operations, supply chain and business relationships;
- managing risks to stop, prevent or mitigate identified negative impact;
- monitoring and assessing the implementation and results of planned actions while ensuring the continuous improvement of process;
- communicating on how negative impact on human rights is managed within the Group and what actions are planned for the future.

4.3. The Group shall also strive to involve stakeholders, particularly those most at risk of negative impact, at all stages of the process.

4.4. The human rights due diligence process shall be continuously reviewed and improved while taking into account regulatory changes, business context, expert recommendations and best international practices.

## 5. REPORTING VIOLATIONS

5.1. Reports of possible human rights violations can be submitted via the Group's internal whistleblowing channel (the Trust line). Information on reporting methods and procedures is published on the [Group's website](#).

## 6. IMPLEMENTATION AND MONITORING

6.1.The Policy shall be approved by the Management Board of AB “Ignitis grupė”.

6.2.The Policy Owner (Group sustainability) shall be responsible for preparing the Policy, revising its provisions, consulting on the application of the Policy’s provisions and monitoring the implementation of the Policy.

6.3.Heads of Group Companies and Functions shall be responsible for the implementation and enforcement of the Policy therein. When implementing the Policy, they shall cooperate with the Policy Owner.

6.4.The implementation of the Policy shall be detailed in the internal Group human rights implementation and compliance monitoring standard approved by Head of Group Sustainability.

6.5.The Policy is published publicly.

## 7. TERMS AND ABBREVIATIONS

<b>Remuneration</b>	The totality of financial and non-financial measures that a Group Company uses to attract, motivate and retain employees.
<b>Sustainable Development Goals</b>	Global goals set by the UN to promote sustainable social, economic and environmental development.
<b>AI</b>	Artificial intelligence.
<b>EU</b>	European Union
<b>Group</b>	AB “Ignitis grupė” and the legal entities it controls directly or indirectly.
<b>Company</b>	A company of the Group.
<b>Due diligence</b>	A thorough assessment of the organisation’s activities, risks, and impacts on human rights and the environment, conducted on the basis of comprehensive data and analyses.
<b>UN</b>	The United Nations.
<b>Vulnerable groups</b>	Groups of persons or communities that, due to their social, economic or health-related circumstances, face a greater risk of their rights being violated or not being ensured properly.
<b>ILO</b>	International Labour Organisation.
<b>Indigenous peoples</b>	Historical communities that have lived in a particular area since ancient times, have a unique culture, language, traditions and often have a special connection to the land and nature.