

Approved by the Management Board of AB "Ignitis grupė"

Effective as of: 21/04/2026

Policy owner: Group Health, Safety and Environment Function

Group Environmental Policy



1. PURPOSE AND SCOPE

The purpose of the Group Environmental Policy is to ensure that the Group's operations are conducted in compliance with all applicable environmental legal requirements, permits, and standards, by systematically managing environmental risks and applying environmental management principles at all stages of operations.

This document is the Group's official commitment to actively manage environmental risks and integrate environmental requirements into the Group's operational decisions, with the aim of ensuring that the Group's operations, expansion, and projects contribute to the creation of a 100% green and secure energy ecosystem.

The Policy applies to all Group Companies to the extent that it does not conflict with the requirements set out in the legislation of the Republic of Lithuania, the European Union (EU) and other countries where the Group Companies are registered and operate.

The principles of this Policy are incorporated into contracts with Contractors at any stage of the operational cycle, including planning, construction, operation, maintenance, and decommissioning.

2. GENERAL PROVISIONS

Environmental protection is one of the top priorities for all Group Companies.

Group Companies are committed to collaborating and exchanging best practices to minimise environmental impact and strengthen a shared environmental culture. The Group's environmental practices comply with applicable EU and national legislation and are aligned with international principles of responsible business conduct, including the principles of the United Nations Global Compact.

To ensure consistent improvement in environmental management, Group Companies implement and maintain environmental management systems in accordance with the ISO 14001 standard.

3. ENVIRONMENTAL MANAGEMENT PRINCIPLES

Management and Compliance	Compliance with legal and regulatory requirements and alignment of operations with best market practices form a robust management system.
Operational Risk Management	Systematic identification, assessment, and mitigation of potential risks in the organisation's processes.
Culture and Leadership	Managers responsible for environmental matters within the company foster an environmental culture through their example and take the lead in implementing environmental principles.
People and Capabilities	Appropriate resources, training, and equipment help ensure that all employees have the necessary knowledge, skills, and tools to apply environmental principles in their work.
Monitoring and Continuous Improvement	Regular assessment of environmental performance and a commitment to continuously improve environmental practices, including the adoption of innovative solutions and technologies, enable the Group to adapt and respond to emerging environmental challenges.

4. GROUP COMMITMENTS

The Group is committed to:

- Establishing clear principles for operational planning;
- Helping ensure a smooth running of day-to-day operations;
- Ensuring consistent and effective management of environmental incidents.

Commitments during the preparation phase:

- **Ensure the allocation of responsibilities**
The Group defines employees' responsibilities in environmental activities, coordinates processes, organises inspections, and ensures that companies submit environmental reports that are prepared on time and comply with legal requirements.
- **Ensure meaningful engagement**
by promoting transparent and accountable environmental activities among all stakeholders, fostering open dialogue with communities to raise environmental awareness among communities and stakeholders and develop local initiatives.
- **Incorporate environmental considerations into decision-making**
by integrating environmental impact and risk assessments into planning, design, and operational processes to ensure a long service life of all assets and compliance with requirements.
- **Apply the latest and most reliable scientific knowledge available**
by collaborating with scientists and research institutions to ensure environmentally friendly solutions.

Commitments on day-to-day operations:

- **Ensure full compliance and monitoring of indicators**
in accordance with all applicable environmental legislation, industrial pollution permits, standards, monitoring programs, and the requirements set out in the internal documents of the Group Health, Safety and Environment Function, including the performance of specified laboratory tests and the evaluation of their results.
- **Minimise the environmental impact of operations**
by systematically deepening the understanding of the impact of operations, assessing its scope and priority areas, implementing data and risk-based prevention and mitigation measures, continuously

improving operational practices and ensuring a high standard of environmental management.

- **Ensure the elimination of non-compliances with environmental requirements**
by establishing a procedure under which non-compliances with environmental requirements are identified, investigated, and addressed through corrective and preventive measures to prevent recurrence.
- **Ensure waste management**
by implementing waste sorting and management in accordance with the core principles (reduce, reuse, recycle, recover), transferring waste to licensed waste management operators, and establishing waste collection sites in accordance with applicable environmental requirements.
- **Ensure the management of chemical substances**
by implementing the principles for reducing the use of resources, applying requirements for safe use, storage, labelling, and disposal, and ensuring that chemical substances are managed in accordance with applicable legislation and risk mitigation measures.
- **Prevent pollution**
by applying preventive measures and ensuring responsible use of hazardous substances and equipment, as well as conducting regular risk assessments and control measures. The Group is committed to using water responsibly and properly managing wastewater, preventing pollutants from entering the environment, and managing air pollution, noise, and vibrations in accordance with legal requirements and impact mitigation measures.
- **Protect terrestrial and aquatic habitats and the environment**
by implementing impact mitigation and environmental restoration measures, and, where necessary, applying compensatory measures.

Commitments to responses to incidents and emergencies:

- **Ensure response to incidents and emergencies**
by developing accident prevention and response plans, ensuring response capabilities, investigating environmental incidents, addressing environmental non-compliance, and implementing corrective and preventive measures.

5. ROLES AND RESPONSIBILITIES IN ENVIRONMENTAL MATTERS

CEOs of Group Companies are leaders in environmental activities and ensure top-level accountability for compliance with environmental requirements.

The Head of Group Health, Safety and Environment is responsible for detailing the provisions of the Policy in the Group's other internal normative legal acts, including, but not limited to, those related to the use, monitoring, calculation, reporting, and analysis of environmental indicators across the Group, as well as the reporting and investigation of environmental incidents.

Managers responsible for environmental matters within the company are responsible for implementing this Policy, providing resources for environmental initiatives, and ensuring compliance with legal requirements. Managers must lead by example and foster an environment where environmental awareness, compliance, and continuous improvement are an integral part of day-to-day operations.

Employees are responsible for applying environmental principles in accordance with internal procedures and environmental legislation requirements, using resources responsibly, and reporting any environmental risk factors, compliance breaches, or incidents. Active participation in improving environmental processes is encouraged.

Environmental Specialists are responsible for developing, implementing, and monitoring compliance with internal environmental requirements, including permits, monitoring programs, licences, training, and monitoring of legal and compliance requirements, incident investigations, and continuous improvement initiatives to ensure effective environmental management and protection.

Contractors must comply with the Group's requirements, including requirements for relevant decisions on environmental impact assessments, training, incident reporting, and inspection procedures, as specified in contracts between Contractors and Group Companies. Group Companies are responsible for ensuring Contractor compliance through pre-qualification, training, and active monitoring.

6. IMPLEMENTATION AND MONITORING

The Policy owner is responsible for preparing the Policy, reviewing it, providing guidance on the application of its provisions, as well as monitoring its implementation.

The CEOs of Group Companies and the Heads of Functions and/or the people delegated by them are responsible for the implementation and enforcement of the Policy within their respective Companies and Functions. They shall cooperate with the Policy owner in implementing the Policy.

The Policy is publicly available on AB "Ignitis grupė" [website](#).

Failure to comply with the requirements of this Policy may be considered a material breach of contractual obligations and may result in the application of contractual sanctions against Contractors and their subcontractors (if provided for in contracts with Contractors and/or subcontractors).

TERMS AND DEFINITIONS

Contractor	A contractor or service provider, i.e., an entity (a natural person, a private or public legal entity, another organisation and its division, or a group of such persons/entities) with whom a specific Group Company has entered into a contract for the performance of works or the provision of services and where it is possible to estimate the specific hours spent performing the works or providing the services for a specific Company, and where the works are performed or the services are provided on the Company's premises or at its site. The definition of a Contractor does not include suppliers of goods.
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Environmental Incident	An unplanned event that causes or may cause harm – the release of pollutants into the air, soil, or water; unlawful use of resources; waste management violations; breach of an environmental permit or legal requirement; a significant negative impact on the environment or biodiversity.
Environmental Impact Assessment	The process of identifying, describing, and drawing conclusions regarding the potential environmental impacts of planned economic activities.
Environmental Non-Compliance	Any failure to comply with environmental legal requirements, permit conditions, monitoring requirements, or internal environmental requirements.
Environmental Specialist	Environmental specialists appointed by a company to perform environmental functions and provide environmental services to the company under a service contract.
Employee	A person working at a Group Company under an employment or internship contract, as well as a member of a Group Company's collegial body.
Group	AB "Ignitis grupė" and the legal entities it controls directly and indirectly.
Group Company	A company of AB "Ignitis grupė" group of companies, including AB "Ignitis grupė".
ISO 14001 standard	An international standard specifying the requirements for an environmental management system.
Manager	A person responsible for supervising and coordinating the work of other Employees.
Policy	Group Environmental Policy, this document.
Risk	The likelihood that an environmental incident or other potential environmental damage will occur.
Risk Assessment	A process during which hazards and risk factors, the extent of potential damage, and the likelihood of such damage are identified, taking into account applicable protective measures; the risk level is determined; a decision is made on the acceptability of the risk, i.e., whether the risk is

acceptable, tolerable, or unacceptable, and on the application of preventive measures.

