



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 function at AB "Ignitis grupė"
Approving company	AB "Ignitis grupė"
Approving person/body	Management Board of AB "Ignitis grupė"
Date of approval, decision No.	19 August 2025 meeting, minutes No. HLD_PR 2025-064
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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, HR Business Partner.

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) any unacceptable behaviour or threat thereof by the employer (natural person or head of legal entity) or other Employees, 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. Company managers 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. Company managers 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. Through periodic meetings organised between Employees and their Direct Managers, they encourage Direct Managers to enquire about Employees' well-being, motivation, and work environment;

3.3.2. In structural units where cases of Abuse and/or harassment have been identified, they initiate discussions to address inappropriate behaviour. If the cases of Abuse and/or harassment investigated in structural units are not confirmed, the Direct Manager of that structural unit, following the principle of proportionality, sends a letter, message, or a reminder or link to the intranet page to the Employees of that unit regarding the signs and manifestations of Abuse and/or harassment at work, respectful behaviour standards, and other relevant matters;

3.3.3. Encourages Employees who have experienced Abuse and/or harassment to seek help: advises contacting the Emotional support line, consulting Well-being mentors, grants leave, transfers to another workplace (in compliance with legal provisions) or takes similar measures;

3.3.4. Employees who have violated the provisions of this Policy are subject to liability established in the Labour Code, the Internal Rules of Procedure of the Companies and other legal acts.

3.4. Other parties, taking into account potential risks of Abuse and harassment, implement measures for their elimination and/or control:

3.4.1. The Group's people well-being, diversity, and inclusion function:

3.4.1.1. Prepares a memo for employees to help them choose appropriate behaviour during conflicts;

3.4.1.2. Initiates and updates training on the risks of Abuse and harassment, preventive measures, and employees' rights and obligations. The training aims to help Employees identify, understand and effectively respond to cases of Abuse and harassment, recognise the forms of Abuse and harassment at work, understand their consequences, learn the methods of proper (ethical) communication and the protection of violated rights, and uses case analysis to help employees acquire the necessary knowledge of appropriate workplace communication and behaviour.

3.4.1.2.1. Training must be organised periodically, at least once every 3 calendar years.

3.4.1.2.2. Training is mandatory for all employees. If due to objective reasons (urgent or pre-planned performance of essential official functions, incapacity for work, leave, business trips, etc.) An Employee is unable to complete the training at the designated time, they must be given the opportunity to do so within 5 working days from the end of the mentioned circumstances. Newly recruited Employees must be given the opportunity to complete the training no later than within 1 month from the date of employment. The fact of completed training is recorded in the Company's internal documents (in the minutes, document management system, etc.). The internal control of the completion of the training is the responsibility of the Group's people well-being, diversity and inclusion function.

3.4.1.2.3. Failure to complete the training on time without objective reasons may be considered a breach of work duties.

3.4.2. HR Business Partners provide opportunities for Employees who have encountered manifestations of Abuse and/or harassment to seek help; they consult Employees during conflicts, listen to concerns, introduce measures in the event of inappropriate behaviour, as specified in subparagraph 8.1 of this Policy; they inform Employees about the methods specified in subparagraph 5.5 of this Policy for submitting reports about Abuse and harassment.

3.4.3. The internal communications functional area, using content prepared by the Group's People Wellbeing, Diversity and Inclusion function, informs Employees about the importance of well-being at work, the need to ensure work-life balance, the emotional support provided in Group Companies (Emotional support line, Well-being mentors), and shares information about potential situations of psychological abuse, solutions, and behaviour methods that help to prevent workplace conflicts.

3.4.4. The responsible parties overseeing the drafting and updating of legal acts inform Employees about internal legal acts regulating the expected behaviour: the Group Code of Ethics, the Group Equal Opportunities and Diversity Policy, this Policy, etc.

3.5. 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.

3.6. 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, HR Business Partner or the Trust Line.

3.7. 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. 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, HR Business Partner, or contact the Trust Line in accordance with the procedure described in subparagraph 5.5 of the Policy.

5.4. Upon receiving information about Abuse and harassment or another potential Policy violation, the Direct Manager, higher-level manager or HR Business Partner shall inform the Employee of the reporting methods set out in subparagraph 5.5 of this Policy. In the event that the Employee does not wish to report the Abuse and harassment but only wants to discipline the offending Employee, the affected Employee shall be informed of the measures set out in subparagraph 8.1 of this Policy.

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. By visiting the Competent entity in person during working hours;

5.5.5. By sending a signed Report to the Company by post to the address Laisvės pr. 10, LT-04215 Vilnius. If the notification is sent by post, the envelope must be marked "To the Competent Body in person" after the name of the Company.

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".

5.6. An Employee may submit a Report of a violation under the Republic of Lithuania Law on the Protection of Whistleblowers (hereinafter the Law) by the following means:

5.6.1. By completing and submitting, via email to pranesejuapsauga@ignitis.lt, a report of a violation in the form prescribed by the Law;

5.6.2. By submitting a signed free-form Report via email to pranesejuapsauga@ignitis.lt, indicating that the report is being submitted in accordance with the Law.

5.7. After receiving a Report on Abuse and harassment via one of the means described in subparagraph 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.

5.8. The investigation is carried out by a commission established by decision of the Head of the People Well-being, Diversity, and Inclusion function, in accordance with the Group's Investigation Commission Rules of Procedure.

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 free 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 (in compliance with legal provisions), 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 HR 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. The Group's Well-being, Diversity and Inclusion function is responsible for the preparation and updating of the Policy.

9.3. The Head of the Business Resilience function is responsible for implementing the procedure for the submission and examination of reports as set out in the Policy within the Group, and the Head of the People Well-being, Diversity and Inclusion function is responsible for the implementation of Abuse and harassment prevention measures. Company Managers are responsible for the implementation of the Policy within 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. Rules of Procedure of the Investigation Commission.