



Normative internal legal act	Equal Opportunities and Diversity Policy of the Group
Title of the process	Equal Opportunities Management
Process owner (unit)	Diversity, Inclusion and Well-Being Unit at AB "Ignitis grupė"
Approving company	AB "Ignitis grupė"
Approving person/body	Management Board of AB "Ignitis grupė"
Date of entry into force	31 October 2024

EQUAL OPPORTUNITIES AND DIVERSITY POLICY OF THE GROUP

1. PURPOSE AND SCOPE

1.1. The purpose of the Policy is to regulate the principles of fostering, implementing and enforcing equal opportunities and diversity, as well as the main measures for the implementation of these principles in the Companies of the Group.

1.2. The Policy shall apply to all Companies of the Group.

2. TERMINOLOGY

2.1. **Employee** means a natural person who works at a Group Company under an employment contract.

2.2. **Large Company** means a company whose at least 2 indicators on the last day of the financial year exceed two of the following amounts: (1) the value of assets indicated in the balance sheet – 25,000,000 euros; (2) net sales revenue during the reporting financial year – 50,000,000 euros; (3) average annual number of employees during the reporting financial year – 250 employees, as defined in the Law of the Republic of Lithuania on the Reporting of Companies and Groups of Companies.

2.3. **Discrimination** means Direct and Indirect Discrimination, Harassment, Sexual Harassment, instruction to discriminate on the basis of gender, race, nationality, ethnicity, 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.

2.4. **Group** means AB "Ignitis grupė" and the legal entities it controls directly or indirectly.

2.5. **Company** means a company of AB "Ignitis grupė" group of companies.

2.6. **Collegial Body** means a collegial management body (Management Board/Board) and/or a collegial supervisory body (Supervisory Board), as specified in the documents of incorporation of a Group Company. The duties of a member of a Collegial Body also apply to the members of a committee established by a general meeting of shareholders, a supervisory and/or management body.

2.7. **Comparative Evaluation of Qualifications** means the evaluation of the qualifications and competences of candidates, results of their professional activity and suitability for a particular position by comparing them with one another during the selection of candidates for that particular position.

2.8. **Equal Opportunities and Diversity** means respect for human rights regardless of gender, race, nationality, citizenship, ethnicity, language, origin, social status, religion, faith, belief, convictions or views, age, sexual orientation, disability, state of health, membership in a political party or association, family or marital status, as set forth in international human and civil rights documents and laws of the Republic of Lithuania.

2.9. **Violation of Equal Opportunities and Diversity** means non-compliance with the principles and/or measures for the implementation of these principles as outlined in this Policy and/or failure to perform or improper performance of any related obligations.

2.10. **Principle of Equal Opportunities and Diversity** means the fundamental provision that regulates the implementation and supervision of the enforcement of Equal Opportunities and Diversity.

2.11. **Indirect Discrimination** means any act or omission, rule of law or assessment criterion, manifestly neutral condition or practice that is formally identical but the implementation or application of which results or may result in *de facto* restriction on the exercise of any rights or privileges or in the granting of preference or advantage based on gender, race, nationality, citizenship, language, origin, social status, faith, belief, convictions or views, age, sexual orientation, disability, state of health, ethnicity, religion, family or marital status, unless this act or omission, rule of law or assessment criterion, condition or practice is justified by a legitimate aim, and the means of achieving that aim are appropriate and necessary.

2.12. **Trust Line** means the Group's internal whistleblowing channel administered by the Group's Corporate Security functional area for anonymous and confidential reporting of violations of the law committed by the Group's employees or business partners that pose a threat or violate the public interest.

2.13. **Policy** means the Equal Opportunities and Diversity Policy of the Group, this document.

2.14. **Report** means information provided by the reporting person in any form (orally, in writing, by telephone or e-mail) about a violation of Equal Opportunities and Diversity that is likely to have been committed, is being committed or is anticipated.

2.15. **Sexual Harassment** means an unwanted offensive sexual behaviour directed at a particular person in an attempt to undermine that person's dignity, create an intimidating, hostile, degrading or offensive environment. Sexual Harassment can take the form of verbal, written or physical actions.

2.16. **Social Status** means a person's situation determined by their marital status, education, qualifications or training and studies at educational institutions, property ownership, income received, need for state support as defined by law and/or other factors related to the person's financial situation.

2.17. **Direct Discrimination** means the treatment of a person when, based on their gender, race, nationality, ethnicity, 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, they are subject to less favourable conditions than the conditions which are accorded, were accorded or would be accorded to any other person under similar circumstances, except as permitted by law.

2.18. **Executive Committee** means a body which is formed by the CEO of a Company, after obtaining agreement from the Management Board of the Group, to ensure efficient management of the Company and which, together with the CEO of the Company, organises and carries out the Company's economic and financial activities in a proper manner and makes decisions on matters specified in the Articles of Association of the Company, in the Regulations of the Executive Committee and in the internal legal acts of the Group and/or the Company.

3. PRINCIPLES OF EQUAL OPPORTUNITIES AND DIVERSITY

3.1. The Companies of the Group shall ensure Equal Opportunities and Diversity for their Employees and shall not tolerate any Direct or Indirect Discrimination in any areas of their activities.

3.2. The Companies of the Group shall promote a working environment that reflects the diversity of the society and shall implement the principles of tolerance and respect for diversity in their activities.

3.3. The Companies of the Group shall promote goodwill and mutual trust among their Employees and create an inclusive, productive and diversity-friendly atmosphere.

3.4. The Companies of the Group shall respect and protect the rights of their Employees, treat them fairly and respectfully, create safe working conditions that meet their needs, promote the best possible use and improvement of the Employees' abilities and shall not discriminate against their Employees in any form.

3.5. The Employees must be honest, objective, open to diversity, must not humiliate other Employees, must adhere to the highest principles of Equal Opportunities and respect for human rights.

3.6. The Employees' working conditions, salaries, additional benefits and other aspects of their work organisation shall be set in such a way as to create Equal Opportunities and help the Employees balance their work, private life and family responsibilities.

3.7. Every Employee, regardless of their gender, race, nationality, citizenship, language, origin, social status, faith, belief, convictions or views, age, sexual orientation, disability, status of health, ethnicity, membership in a political party or association, religion, family or marital status, shall have the right to receive remuneration for work in a Company, which depends on the functions performed, the quality of work, professional and subject-specific abilities, but not on the characteristics of the Employee that are not related to the work performed.

3.8. The Companies shall be responsible for implementing the Principles of Equal Opportunities and Diversity, disseminating information and performing regular progress reviews.

3.9. The violation of this Policy and the Principles of Equal Opportunities and Diversity may be considered a serious breach of job duties.

4. POLICY ON THE DIVERSITY OF COLLEGIAL BODIES AND EXECUTIVE COMMITTEES

4.1. The composition of the Group's Collegial Bodies and Executive Committees must aim to ensure demographic diversity among their members in terms of gender, age, and ethnic or cultural origin to the extent compatible with the legislation.

4.2. The composition of the Group's Collegial Bodies and Executive Committees must aim to ensure cognitive diversity among their members in terms of diversity of ideas, views, skills, professional experience, knowledge and ways of thinking to the extent compatible with the legislation.

4.3. Large Companies of the Group must aim to reach that persons of the underrepresented gender in the management and supervisory bodies of the Companies occupy at least 33% (but no more than 49%) of the positions of members of the Company's management and supervisory bodies. It should be noted that this aspiration should not be understood as a quota (i.e. a rule on how many persons of the underrepresented gender must be appointed to the specified positions), but only as a goal of diversity, which is pursued by means that do not discriminate against candidates.

4.4. Members of the Group's Collegial Bodies and Executive Committees shall be selected based on the comparative evaluation of the qualifications of each candidate, i.e. on the basis of their competence, experience and suitability for the position, ensuring a fair selection process based on the highest standards of transparency.

4.5. When the regulation of the Law on Equal Opportunities for Women and Men of the Republic of Lithuania applies to a Large Company of the Group, preference shall be given to the candidate of the underrepresented gender in the management and supervisory bodies of the Company when choosing among the candidates with the same qualifications, suitability for a particular position, competence and results of professional activity.

4.6. The Companies of the Group shall disclose information about the applied diversity policy and the gender equality report in accordance with the procedure established by legal acts.

4.7. Members of the Group's Collegial Bodies and Executive Committees shall respect and adhere to the highest Principles of Equal Opportunities and Diversity and respect for human rights and shall not tolerate any Direct or Indirect Discrimination in any areas of activities.

4.8. Members of the Group's Collegial Bodies and Executive Committees shall, by their example, demonstrate respect for Equal Opportunities and Diversity and shall, by their actions, support the creation of an inclusive and respectful work culture and promote an environment of equality, diversity and inclusion within the Companies.

5. MEASURES FOR THE IMPLEMENTATION OF THE PRINCIPLES OF EQUAL OPPORTUNITIES AND DIVERSITY

5.1. In implementing the Principles of Equal Opportunities and Diversity, the Companies shall:

5.1.1. apply uniform selection criteria and conditions in their recruitment processes, based on objective and impartial job-related professional criteria, except in cases where, due to the nature of particular types of professional activities or the conditions under which they are performed, a particular human characteristic is an essential and decisive professional requirement, provided that the aim is legitimate and the requirement is proportionate;

5.1.2. create equal working conditions and an equally safe and healthy working environment for the performance of relevant job functions, provide work equipment and tools necessary for the performance of work, as well as safety measures, depending on the nature of the activities, create opportunities for flexible working conditions and provide equal benefits;

5.1.3. create equal opportunities to progress at work, raise qualifications, retrain, gain practical work experience, participate in educational programs, let the professional and subject-specific potential unfold and develop a career based on professional competencies, experience and abilities;

5.1.4. provide additional benefits based on uniform criteria;

5.1.5. apply equal criteria and procedures for evaluating the performance of the Employees;

5.1.6. apply equal dismissal criteria;

5.1.7. provide equal pay for equal work or for work of equal value;

5.1.8. plan for the promotion of Employee diversity and evaluate the effectiveness of the resulting actions;

5.1.9. ensure that the Employees do not experience any Discrimination, Harassment, Sexual Harassment at the workplace and are not instructed to discriminate;

5.1.10. provide opportunities for the Employees and other interested persons to report any possible violations of the Principles of Equal Opportunities and Diversity and undertake to investigate them in accordance with the established procedure;

5.1.11. ensure that an Employee who has reported a possible violation of Equal Opportunities and Diversity or participates in the proceedings concerning Discrimination, their representative or an Employee who testifies and provides explanations concerning Discrimination is not persecuted and is protected from any retaliatory behaviour or negative consequences. These circumstances cannot be the grounds for the termination of employment with such an Employee;

5.1.12. take appropriate measures to make it possible for persons with disabilities to be recruited, work, pursue a career or study, including an appropriate adaptation of the premises, provided that such measures do not impose a disproportionate burden on the employer.

5.2. In implementing the Principles of Equal Opportunities and Diversity, the Employees shall:

5.2.1. follow the provisions of the Policy in their activities;

5.2.2. not tolerate any Discrimination, humiliation, Harassment, violence, insults against themselves, other Employees or other persons;

5.2.3. inform the employer about any possible violations of the Principles of Equal Opportunities and Diversity.

6. PROCEDURE FOR SUBMITTING AND EXAMINING A REPORT OF A VIOLATION OF EQUAL OPPORTUNITIES

6.1. The Employees or other interested persons must report a possible violation of the Principles of Equal Opportunities and Diversity to the contacts specified in Clause 6.2 of the Policy no later than within 1 (one) month from the date of the violation of Equal Opportunities and Diversity or from the date the violation becomes known.

6.2. Reports of possible violations of Equal Opportunities and Diversity may be submitted directly to the Head of Business Resilience at AB "Ignitis grupė" via e-mail or through the Trust Line by e-mail pasitikejimolinija@ignitis.lt, or by leaving a message on the answering machine at +370 640 88889. The principles for the operation of the Trust Line are set out in the *Standard for the Implementation and Operation of the Group's Internal Reporting Channels of Violations*.

6.3. A report of a possible violation of Equal Opportunities and Diversity must include the following information:

6.3.1. the name and surname of the reporting Employee or another interested person, the name of the Company in which the Employee is employed. If an Employee or another interested person submits a Report through the Trust Line, the information specified in this clause may be omitted;

6.3.2. the name, surname and job title of the Employee who has possibly violated Equal Opportunities and Diversity and the Company in which the Employee is employed;

6.3.3. a specific possible violation of Equal Opportunities and Diversity and its circumstances and the process that led to the possible violation of Equal Opportunities and Diversity.

6.4. A Report of a possible violation of Equal Opportunities and Diversity shall be examined in accordance with the procedure established by *the Rules of Procedure of the Investigation Commission of the Group*.

7. FINAL PROVISIONS

7.1. The Policy shall be approved and amended by a decision of the Management Board of AB "Ignitis grupė". Before deciding on the approval or amendment of the Policy, the Policy and/or its amendments shall be agreed upon with employee representatives (work councils and/or trade unions operating in the Companies). Employee representatives shall be periodically informed about the results of the implementation of the Policy in accordance with the procedure established in the Labour Code of the Republic of Lithuania and collective agreements made in the Companies.

7.2. The Diversity, Inclusion and Well-Being Unit at AB "Ignitis grupė" shall be responsible for preparing and updating the Policy.

7.3. The Head of Diversity, Inclusion and Well-Being at AB "Ignitis grupė" shall be responsible for compliance with the Principles of Equal Opportunities and Diversity and the implementation of the measures provided for in the Policy.

7.4. The CEO of a relevant Company shall ensure the implementation of the provisions of the Policy in the Companies.

7.5. The Policy shall be made publicly available.

8. RELATED LEGAL ACTS

8.1. [Labour Code of the Republic of Lithuania](#).

8.2. [Law on Equal Treatment of the Republic of Lithuania](#).

8.3. [Law on Equal Opportunities for Women and Men of the Republic of Lithuania](#).

8.4. [Standard for the Implementation and Operation of the Group's Internal Reporting Channels of Violations](#).

8.5. Rules of Procedure of the Investigation Commission of the Group.