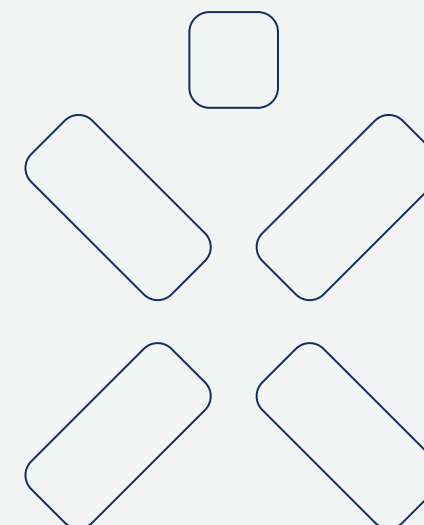


A wide-angle photograph of a rural landscape under a clear blue sky. In the foreground, there is a grassy field with some trees. In the middle ground, a line of trees with autumn foliage separates the foreground from the background. In the background, several tall, white wind turbines are visible against the sky. A small cluster of buildings, including a large white house, is visible in the lower left of the middle ground.

The alignment with the Taxonomy  
Regulation report 2024  
(EU Taxonomy report 2024)

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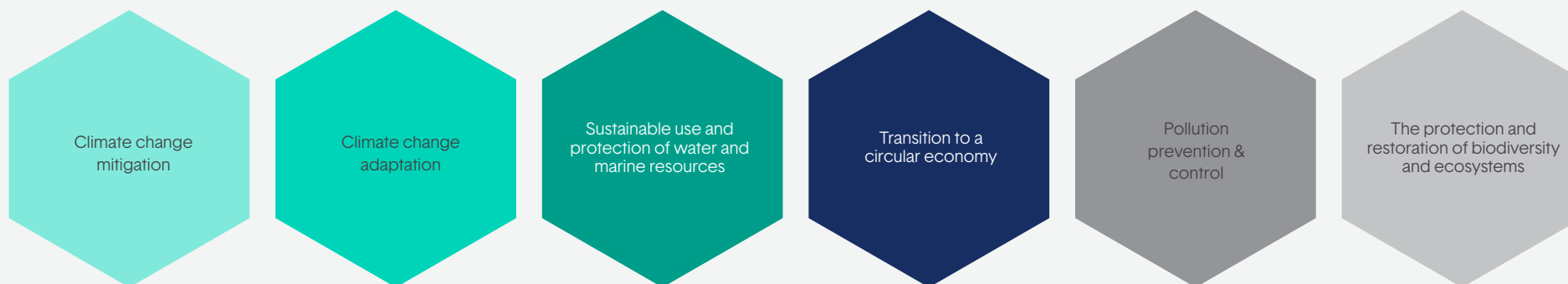
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# I. Introduction to the Taxonomy Regulation

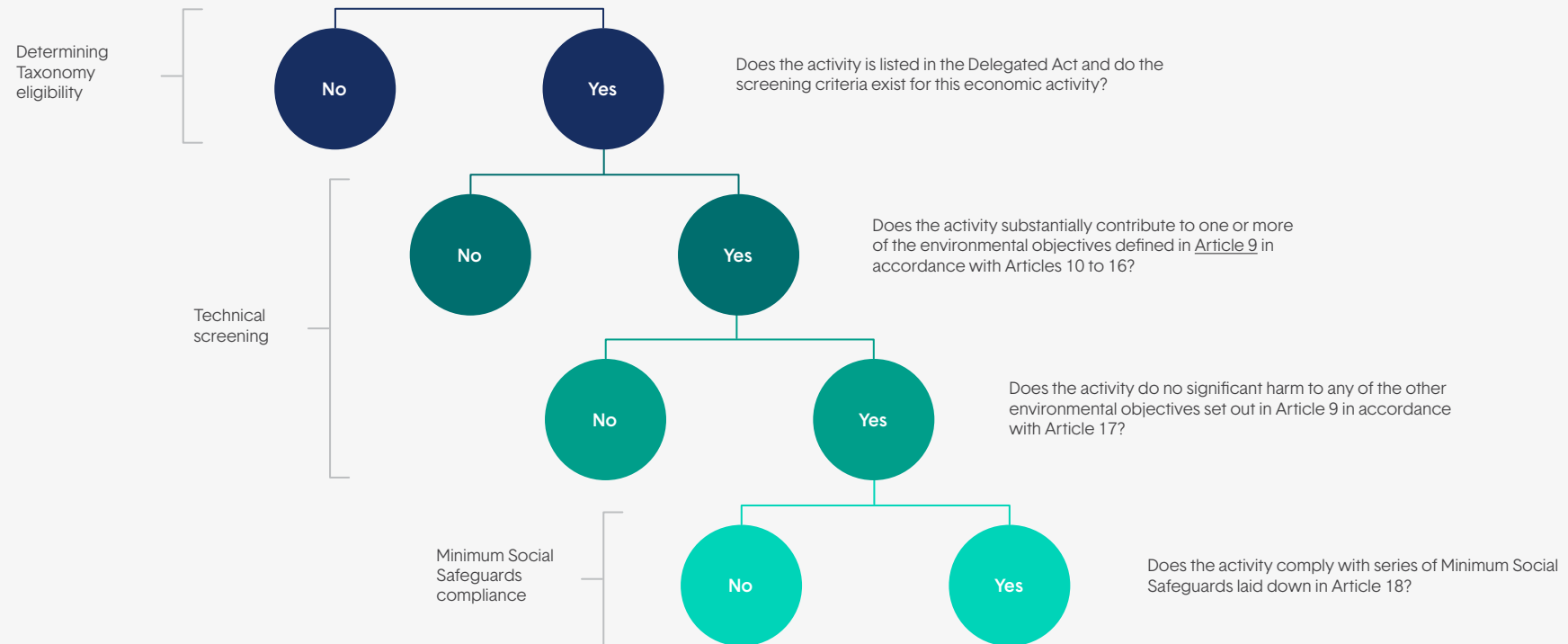
The EU Taxonomy Regulation (EU) 2020/852 aims to provide a common framework for the classification of environmentally sustainable economic activities. It creates a classification system, also known as the EU Taxonomy, that helps scale up sustainable investments, provide companies, investors and policymakers with appropriate definitions for which economic activities can be considered environmentally sustainable and, in this way, to help shift investments where they are the most needed.

The Taxonomy Regulation in Article 9 sets out six environmental objectives that an economic activity must contribute to in order to be considered environmentally sustainable. These objectives are:



Under the regulation, the list of environmentally sustainable activities with technical screening criteria for each environmental objective was developed and laid in Delegated Acts. A first [Delegated Act on sustainable activities for climate change mitigation and adaptation](#) objectives was published on 9 December 2021. On 9 March 2022, the Commission adopted a [Complementary Climate Delegated Act](#) including, under strict conditions, specific nuclear and gas energy activities in the list of economic activities covered by the EU Taxonomy. On 27 June 2023, [Environmental Delegated Act](#) setting criteria for economic activities making a substantial contribution to one or more of the non-climate environmental objectives has been adopted extending the list of Taxonomy-eligible activities.

These Delegated Acts clearly states what technical screening criteria for substantial contribution and do no significant harm need to be met for the activity to be environmentally sustainable, or green. In other word, the activity needs to be Taxonomy-aligned and the Taxonomy Regulation establishes clear conditions how to determine this alignment:



The Taxonomy Regulation also sets mandatory requirements on disclosure, with the aim of providing transparency on environmental performance. For the 2021 fiscal year, the Group disclosed under simplified rules of Taxonomy-eligible economic activities and their share of required KPIs: capital expenditures (Taxonomy CAPEX), operating expenses (Taxonomy OPEX) and revenue, in addition the Group voluntarily disclose Adjusted EBIDTA. Since 1 January 2023, the Group is disclosing a share of previously mentioned KPIs from Taxonomy-aligned economic activities.

## II. Application of the Taxonomy Regulation at the Group

The Group follows a clear steps-based process in analysing the alignment of its activities based on the Taxonomy Regulation. This process is overseen by the top management and involves the responsible functions of the Group and key roles operating the Taxonomy-eligible activities within the companies of the Group. The main steps of this process are:

- 1 **Identifying the Taxonomy-eligible economic activities of the Group.** The Delegated Act on sustainable activities for climate change adaptation and mitigation and the Complementary Climate Delegated Act have been carefully reviewed and analysed and all the activities within the Group's portfolio have been identified. This process is being constantly reviewed to have the up-to-date information. The list of Taxonomy-eligible activities of the Group has been extended, adding activities which were missed in the last annual report for the 2021 fiscal year;
- 2 **Examining the substantial contribution criteria.** All previously identified Taxonomy-eligible activities have been examined whether they meet the technical screening criteria and substantially contribute to the mitigation and/or adaptation objective. To verify the compliance with substantial contribution criteria, the existing operational procedures have been reviewed and, if necessary, specific technical criteria have been analysed;
- 3 **Examining the principle of doing no significant harm to other environmental objectives (DNSH).** It includes further assessment of technical screening criteria for Taxonomy-eligible activities. To verify the compliance with the DNSH, the existing environmental procedures, the waste management processes and other relevant procedures have been analysed;
- 4 **Verifying the compliance with minimum social safeguards.** It includes reviewing the alignment with the OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights of the Group, including each Taxonomy-eligible activity;
- 5 **Determining the alignment status.** Based on the previous steps, after examining substantial contribution and do no significant harm criteria, if Taxonomy-eligible activity meets them, we state that activity is Taxonomy-aligned. If not, we determine that activity is not Taxonomy-aligned. Later we further investigate gaps in alignment to improve its status. All this information is disclosed in the Taxonomy-alignment section of this report;
- 6 **Calculating the financial KPIs.** The financial metrics associated with the economic activities identified in this process have been calculated based on the accounting policies described.

### III. Identification of Taxonomy-eligible activities

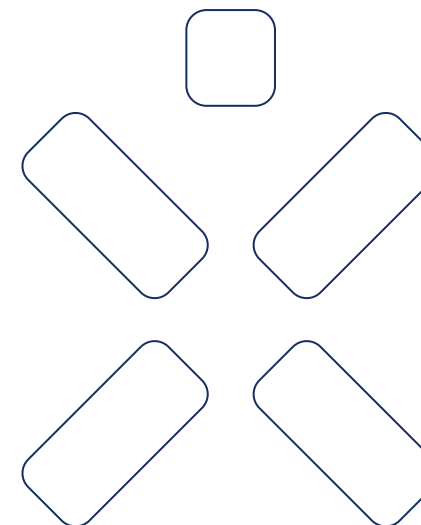
Eligibility of activities implies that an activity is included in the Delegated Acts: Climate, Complimentary Climate or Environmental. As defined in Article 1(5) of the Delegated Regulation (EU) 2021/2178, Taxonomy-eligible economic activity means an economic activity that is described in the delegated acts, irrespective of whether that economic activity meets any or all of the technical screening criteria laid down in those delegated acts. Being Taxonomy-eligible is merely an indication that a certain activity can make a substantial contribution to one of the six environmental objectives. In this respect, Taxonomy-non-eligible economic activity is simply not listed in any of the Delegated Acts.

Taxonomy-eligibility is a first step towards determining Taxonomy alignment and it helps to prepare for further assessment steps. After carefully reviewing Delegated Acts, it was concluded, that the Group performs the following Taxonomy-eligible activities under both mitigation and adaptation environmental objectives. No corresponding activities detected in Environmental Delegated Act.

New corresponding activity to '4.10 Storage of electricity' has been identified – Battery energy storage system at its early stage. In addition, after alignment assessment, it was determined, that few projects from activity '7.6 Installation, maintenance and repair of renewable energy technologies' do not meet on-site requirement, thus are eliminated and reported as non-eligible.

No other changes to the list of Taxonomy-eligible and aligned activities have been made since previous reporting period.

Taxonomy-non-eligible economic activities of the Group include supply of electricity and natural gas, distribution of natural gas, cogeneration of heat / cool and power from waste and other non-significant activities on the Group level.



## The list of Taxonomy-eligible activities

Activity listed in the Delegated Acts	Code	Activity description for climate change mitigation objective	Activity description for climate change adaptation	Group activity corresponding to the description	Business segment
<b>Electricity generation using solar photovoltaic technology</b>	CCM 4.1 / CCA 4.1	Construction or operation of electricity generation facilities that produce electricity using solar photovoltaic (PV) technology.	Construction or operation of electricity generation facilities that produce electricity using solar photovoltaic (PV) technology.	Solar parks	Green Capacities
<b>Electricity generation from wind power</b>	CCM 4.3 / CCA 4.3	Construction or operation of electricity generation facilities that produce electricity from wind power.	Construction or operation of electricity generation facilities that produce electricity from wind power.	Wind farms	Green Capacities
<b>Electricity generation from hydropower</b>	CCM 4.5 / CCA 4.5	Construction or operation of electricity generation facilities that produce electricity from hydropower.	Construction or operation of electricity generation facilities that produce electricity from hydropower.	Kaunas HPP	Green Capacities
<b>Transmission and distribution of electricity</b>	CCM 4.9 / CCA 4.9	Construction and operation of distribution systems that transport voltage and low-voltage distribution systems.	Construction and operation of distribution systems that transport electricity on high-voltage, medium-voltage and low-voltage distribution systems.	Electricity networks	Networks
	CCM 4.9 (f)	f) installation of equipment such as, but not limited to future smart metering systems or those replacing smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council(180), which meet the requirements of Article 20 of Directive (EU) 2019/944, able to carry information to users for remotely acting on consumption, including customer data hubs.	N/A	Installation of smart metering systems	Networks
<b>Storage of electricity</b>	CCM 4.10 / CCA 4.10	Construction and operation of facilities that store electricity and return it at a later time in the form of electricity. The activity includes pumped hydropower storage.	Construction and operation of facilities that store electricity and return it at a later time in the form of electricity. The activity includes pumped hydropower storage.	Kruonis PSHP	Green Capacities
<b>Cogeneration of heat/cool and power from bioenergy</b>	CCM 4.20 / CCA 4.20	Construction and operation of installations used for cogeneration of heat/cool and power exclusively from biomass, biogas or bioliquids, and excluding cogeneration from blending of renewable fuels with biogas or bioliquids (see Section 4.19 of this Annex).	Construction and operation of installations used for cogeneration of heat/cool and power exclusively from biomass, biogas, or bioliquids, excluding cogeneration from blending of renewable fuels with biogas or bioliquids (see Section 4.19 of this Annex).	Vilnius cogeneration biomass unit	Green Capacities

## The list of Taxonomy-eligible activities (cont.)

Activity listed in the Delegated Acts	Code	Activity description for climate change mitigation objective	Activity description for climate change adaptation	Group activity corresponding to the description	Business segment
<b>Production of heat/cool from bioenergy</b>	CCM 4.24 / CCA 4.24	Construction and operation of facilities that produce heat/cool exclusively from biomass, biogas or bioliquids, and excluding production of heat/cool from blending of renewable fuels with biogas or bioliquids (see Section 4.23 of this Annex).	Construction and operation of facilities that produce heat/cool exclusively from biomass, biogas or bioliquids, excluding production of heat/cool from blending of renewable fuels with biogas or bioliquids (see Section 4.23 of this Annex).	Elektrénai biomass unit	Green Capacities
<b>Electricity generation from fossil gaseous fuels</b>	CCM 4.29 / CCA 4.29	Construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels. This activity does not include electricity generation from the exclusive use of renewable non-fossil gaseous and liquid fuels as referred to in Section 4.7 of this Annex and biogas and bio-liquid fuels as referred to in Section 4.8 of this Annex.	Construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels that meet the criteria in point 1 (a) of Section 4.29 of Annex I. This activity does not include electricity generation from the exclusive use of renewable non-fossil gaseous and liquid fuels referred to in Section 4.7 of Annex I and biogas and bio-liquid fuels referred to in Section 4.8 of Annex I.	CCGT, 7 <sup>th</sup> and 8 <sup>th</sup> blocs at Elektrénai Complex	Reserve Capacities
<b>Transport by motorbikes, passenger cars and light commercial vehicles</b>	CCM 6.5 / CCA 6.5	Purchase, financing, renting, leasing and operation of vehicles designated as category M1, N1, both falling under the scope of Regulation (EC) No 715/2007 of the European Parliament and of the Council, or L (2- and 3-wheel vehicles and quadricycles)	Purchase, financing, renting, leasing and operation of vehicles designated as category M1, N1, both falling under the scope of Regulation (EC) No 715/2007 of the European Parliament and of the Council, or L (2- and 3-wheel vehicles and quadricycles)	Group owned vehicles	Networks and Other
<b>Infrastructure enabling low-carbon road transport and public transport</b>	CCM 6.15	Construction, modernisation, maintenance and operation of infrastructure that is required for zero tailpipe CO <sub>2</sub> operation of zero-emissions road transport, as well as infrastructure dedicated to transshipment, and infrastructure required for operating urban transport.	N/A	Ignitis ON EV network	Customers & Solutions
<b>Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)</b>	CCM 7.4 / CCA 7.4	Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings.	Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings.	EV station installation	Customers & Solutions



## The list of Taxonomy-eligible activities (cont.)

Activity listed in the Delegated Acts	Code	Activity description for climate change mitigation objective	Activity description for climate change adaptation	Group activity corresponding to the description	Business segment
Installation, maintenance and repair of renewable energy technologies	CCM 7.6 / CCA 7.6	Installation, maintenance and repair of renewable energy technologies, on-site	Installation, maintenance and repair of renewable energy technologies, on-site, consisting in one of the following individual measures, if installed on-site as technical building systems: a) installation, maintenance and repair of solar photovoltaic systems and the ancillary technical equipment; 2018/2001 and the ancillary technical equipment; d) installation, maintenance and repair of wind turbines and the ancillary technical equipment;	a) Solar PV installation	Customers & Solutions, Green Capacities
Acquisition and ownership of buildings	CCM 7.7 / CCA 7.7	Buying real estate and exercising ownership of that real estate.	Buying real estate and exercising ownership of that real estate.	Group owned buildings	Reserve Capacities and Other

## IV. Determining Taxonomy alignment

When all Taxonomy-eligible activities of the Group (table above) has been identified, the examination of substantial contribution criteria for climate change mitigation followed together with the examination of do no significant harm to other environmental objectives criteria. This process has allowed to determine the status of activity alignment. The list of the Taxonomy-aligned activities is presented in the table below and the description of how these activities meet required technical screening criteria follows. This year's assessment evaluated the climate change mitigation objective, which is more relevant for our activities at this moment.

### Taxonomy-aligned activities

Activity listed in the Delegated Acts	Codes	Corresponding activity in the Group	Business segment	Alignment with mitigation objective
Electricity generation using solar photovoltaic technology	CCM 4.1 / CCA 4.1	Construction and electricity generation of solar farms	Green Capacities	Aligned
Electricity generation from wind power	CCM 4.3 / CCA 4.3	Construction and electricity generation of wind farms	Green Capacities	Aligned
Electricity generation from hydropower	CCM 4.5 / CCA 4.5	Electricity generation in Kaunas HPP	Green Capacities	Aligned
Transmission and distribution of electricity	CCM 4.9 / CCA 4.9	Electricity distribution	Networks	Aligned
Installation of equipment such as, but not limited to future smart metering systems or those replacing smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council	CCM 4.9 (f)	Installation of smart metering systems	Networks	Aligned
Storage of electricity	CCM 4.10 / CCA 4.10	Storage of electricity in Kruonis PSHP and BESS	Green Capacities	Aligned
Cogeneration of heat/cool and power from bioenergy	CCM 4.20 / CCA 4.20	Cogeneration of heat and electricity in Vilnius CHP biomass	Green Capacities	Aligned
Production of heat/cool from bioenergy	CCM 4.24 / CCA 4.24	Production of heat in Elektrėnai biomass unit	Green Capacities	Aligned
Electricity generation from fossil gaseous fuels	CCM 4.29 / CCA 4.29	Electricity generation in Elektrėnai Complex 7, 8 units and CCGT	Reserve Capacities	Not aligned
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5 / CCA 6.5	Renting, leasing and operation of vehicles	Networks and Other	Partially aligned
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	EV charging stations network	Customers & Solutions	Aligned
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4 / CCA 7.4	EV installation	Customers & Solutions	Aligned
Installation, maintenance and repair of renewable energy technologies	CCM 7.6 / CCA 7.6	PV installation and maintenance	Customers & Solutions, Green Capacities	Aligned
Acquisition and ownership of buildings	CCM 7.7 / CCA 7.7	Rental of buildings	Reserve Capacities and Other	Not aligned

## Description of criteria alignment

### 4.1 Electricity generation using solar photovoltaic technology

Ignitis Group has solar PV projects under construction in Poland and Latvia. After completing construction stage, the Group will be generating electricity using solar photovoltaic (PV) technology. The PV project in Lithuania (Tauragė solar farm) has commenced its operations in 2024.

The Group is expanding its Green Capacities portfolio constantly. For more up to date information on the Group's Green Capacities portfolio, read section '2.3 Investment program' of the Group's [Integrated Annual Report 2024](#).

Furthermore, this activity does no significant harm to other environmental objectives.

#### Adaptation to climate change

See Climate Change Adaptation part.

#### Transition to a circular economy

The best available technologies on the market are considered when purchasing solar PV park projects or in construction planning stage, which includes consideration of the best technologies lasting for the whole project life cycle.

All waste generated during ongoing different stages of development of PV parks (including construction and operation) are being managed in accordance with national waste management requirements.

The Group is working on solar PV parks' end-of-life roadmap to develop a strategy for existing and new Ignitis Group renewable energy projects to take responsible actions and implement sustainable solutions at their end-of-life stages, based on circularity principles.

#### The protection and restoration of biodiversity and ecosystems

In all activities where we are legally obliged to carry out an Environmental Impact Assessment (EIA), an Environmental Impact Assessment Screening (EIA screening) or other mandatory procedure (this may include "Determination of the significance of the impact of the implementation of a planned economic activity on an established or potential Natura 2000 site", etc.), we shall ensure that any potential impacts on biodiversity and ecosystems are avoided, and, if they are unavoidable, are mitigated or appropriately removed.

### 4.3 Electricity generation from wind power

The Group operates onshore wind farms in Lithuania, Estonia and Poland. The Group also has onshore wind farms in under construction stages. The Group has won offshore wind tenders in Lithuania and Estonia in 2023, the projects are currently under development. The Group is a minority shareholder in offshore wind farm under construction in the UK. Thus, the Group either generates electricity from wind power with already operational farms or it will generate after completion of construction stage.

The Group is expanding its Green Capacities portfolio constantly. For more up to date information on the Group's Green Capacities portfolio, read

section '2.3 Investment program' of the Group's [Integrated Annual Report 2024](#).

#### Adaptation to climate change

See Climate Change Adaptation part.

#### Transition to a circular economy

The best available technologies on the market are considered when purchasing wind farm projects or in construction planning stage, which includes consideration of technologies for the whole project life cycle.

All waste generated during ongoing different stages of development (including construction and operation) are being managed in accordance with national waste management requirements. The first wind farm built by the Group started operating only in 2021. The Group is working on wind farms' end-of-life roadmap to develop a strategy for existing and new Ignitis Group renewable energy projects to take responsible actions and implement sustainable solutions at their end-of-life stages, based on circularity principles.

#### The protection and restoration of biodiversity and ecosystems

In all activities where we are legally required to conduct Environment Impact Assessment (EIA) or the screening of Environmental Impact Assessment (EIA screening) we ensure that potential impact on biodiversity and ecosystems is avoided, if it is not possible to avoid, then the impact is mitigated or eliminated as appropriate.

## 4.5 Electricity generation from hydropower

The Group operates electricity generation facility that produces electricity from hydropower – Kaunas Hydroelectric Power Plant (KHPP). Its capacity is 100.8 MW, consisting of 4 units of 25.2 MW each. After conducting the assessment, it was concluded, that the lifecycle GHG emissions from the generation of electricity from hydropower are lower than 100g CO<sub>2</sub>e/kWh, meaning that the activity meets substantial contribution criteria.

Furthermore, this activity does no significant harm to other environmental objectives.

#### Adaptation to climate change

See Climate Change Adaptation part.

#### Sustainable use and protection of water and marine resources

The Law on Water of the Republic of Lithuania, which regulates public relations arising from the use, management and protection of surface and underground water bodies and the water contained in them in the territory of the Republic of Lithuania, and which applies to persons who dispose of surface water bodies, manage, use and / or protect surface and / or underground water bodies and the water contained in them in the territory of the Republic of Lithuania, is the main national legal act transposing requirements of the Directive 2000/60/EC into national legislation. Based on Article 15 point 1 of the Law on Water, ponds are installed, and the maintenance of these surface water bodies are carried out in accordance with the description of the procedure approved by the Minister of the

Environment. The use and maintenance of ponds is regulated by Typical rules for use and maintenance of ponds (LAND 2-95), which sets the framework for water management rules. Based on this framework, the rules for the use and maintenance of Kaunas HPP lagoon have been prepared by Ignitis Gamyba (Green Capacities) and approved by the Environmental Protection Agency in 2016. These rules are a specific tool enabling environmental institutions to control activities in the lagoon. The annual reports of performance in accordance with the LAND 2-95 requirements are provided to the Lithuanian Environmental Protection Agency.

In addition, the fluctuation of the water level of Kaunas lagoon is limited in accordance with the rules for the use and maintenance of Kaunas HPP lagoon. Under normal conditions, the permitted change in water level cannot exceed 0.4 m per day. During fish spawning, fluctuations cannot exceed 0.2 m per day. The limitation of 0.2 m per day is permitted based on year-by-year research and monitoring data, which proves that no significant impact is made by such fluctuation. Without monitoring and scientists' evaluation, fluctuation would be limited to 0.1 m per day. Monthly data of water inflow of Kaunas lagoon and water used to generate electricity (outflow), shows that the difference is close to 1 percent, which is close to water volume stored in (or released from) Kruonis PSHP reservoir. This confirms that Kaunas HPP work regimes are close to natural flow of river Nemunas.

In accordance with Article 9 part 3 of the Law on Water, Kaunas HPP is a water user and has a mandatory Pollution permit, whose issuing procedure is regulated by the Law on Environmental Protection. Water indicators that are monitored and reported:

A. water intake (thousand m<sup>3</sup>):

- 1) groundwater;
- 2) municipal water supply or other water supply facilities;
- 3) surface waters;
- 4) extracted and reused (surface);

B. water consumption (thousand m<sup>3</sup>).

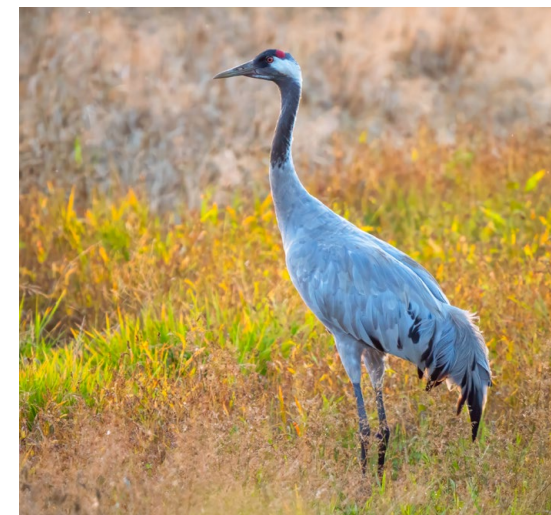
#### **The protection and restoration of biodiversity and ecosystems**

Kaunas HPP has a mandatory Pollution permit, whose issuing procedure is regulated by the Law on Environmental Protection. Kaunas HPP activity is also assessed through annual environmental monitoring of biodiversity of Kaunas lagoon, which is part of National monitoring programme.

The main impact on the natural environment in these areas is related to the fluctuation of the water level in Kaunas lagoon. The values and protected species of Special protection area under the Habitats Directive are not adversely affected by water level fluctuations in Kaunas lagoon.

During the activities of Kaunas HPP, safety requirements and typical rules for the use and maintenance of ponds are observed to ensure no significant impact on the state of fish and bird populations. Every year, between the month of March and July, the impact of water level fluctuations on fish and bird populations in the Kaunas lagoon are monitored by the scientists of Nature Research Centre.

Automatic water level recording facilities are installed tracking water level hourly, and operation is regulated accordingly based on the existing water levels.



Biodiversity in Group's wind and solar farms

## 4.9 Transmission and distribution of electricity

The Group, through its subsidiary, ESO (Networks) is the primary distributor of electricity in Lithuania, distributing electricity to approximately 1.8 million connection points. The distribution network in Lithuania distributes and provides electricity to the ultimate consumers of electricity over medium (35 to 10 kV) and low (10 to 0.4 kV) voltage grids (owned by the ESO). ESO (Networks) is connected to the high voltage (330 to 110 kV) transmission grid (owned by the TSO).

With this activity, the Group meets substantial contribution criteria being part of interconnected European system, i.e. the interconnected control areas of Member States, Norway, Switzerland and the United Kingdom, and its subordinated systems as it is described in the Delegated Acts.

No new direct connection or expansion of an existing direct connection between a substation or network and a power production plant that is more greenhouse gas intensive than 100 gCO<sub>2</sub>e/kWh measured on a life cycle basis was completed in 2024.

Furthermore, this activity does no significant harm to other environmental objectives.

### Adaptation to climate change

See Climate Change Adaptation part.

### Transition to a circular economy

A waste management process is clearly set for all waste generated during this activity and this process follows all existing requirements and laws. We support and seek to ensure maximal reuse and recycling of generated waste at the end of life in accordance with the waste hierarchy.

### Pollution prevention and control

The Group follows highest health and safety principles as required by national laws. The Group respects and follows applicable norms and regulations to limit impact of electromagnetic radiation on human health.

In 2003, to ensure that at that time old devices in distribution networks would not have polychlorinated biphenyls (PCBs), a separate study was conducted and concluded that PCBs are not used.

### The protection and restoration of biodiversity and ecosystems

Based on the Law on the Assessment of the Environmental Impact of planned economic activities in the Republic of Lithuania, distribution networks are not included to the activity list, that need Screening in Environmental Impact Assessment or Comprehensive Environmental Impact Assessment.

Nonetheless, the Group tries to assure minimum impact to biodiversity with its electricity distribution activity. For examples, to reduce the impact of maintenance of overhead lines in forested areas (cutting down trees and bushes, fragmenting habitats, disrupting animal migration, impoverishing the landscape), overhead lines are replaced by

underground cables - thus reducing the impact on the landscape and wildlife – maintenance of underground lines requires smaller protection zones, which reduce affected / altered area. An agreement with state authorities has been reached to reduce the number of trees removed from protection zones (the strip of land along the airline where the service and maintenance of the airline takes place) – only those trees that interfere with the maintenance work, poses a threat to networks or that have damaged the network and are necessary to be removed for repair purposes should be removed.

### The group also execute this activity, that are separately listed under this section:

f) installation of equipment such as, but not limited to future smart metering systems or those replacing smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council, which meet the requirements of Article 20 of Directive (EU) 2019/944, able to carry information to users for remotely acting on consumption, including customer data hubs – Installation of smart metering systems.

## f) Installation of smart metering systems

The Group replaces old meters with smart metering systems that are in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council, which meet the requirements of Article 20 of Directive (EU) 2019/944. The new smart meters are certified and meet the EU standards for smart metering.

Furthermore, this activity does no significant harm to other environmental objectives.

### Adaptation to climate change

See Climate Change Adaptation part.

### Transition to a circular economy

All waste generated during installation of smart meters is managed in accordance with waste management requirements in accordance with existing law. Old meters are collected by the utilisation company. The way of disposal is indicated in the contract, collectors are obliged to transfer them to the market intact. Part of old meters are returned to the warehouse for secondary use.

### Pollution prevention and control

Smart meters and their communication modules are manufactured and operated in accordance with the Directive 2014/53/EU (RED), which regulates the placing of radio communication equipment to the market. It ensures a common market for radio equipment by setting essential requirements for safety and health, electromagnetic compatibility, and efficient use of the radio spectrum.

### The protection and restoration of biodiversity and ecosystems

Based on the Law on the Assessment of the Environmental Impact of planned economic activities in the Republic of Lithuania, installation of smart metering is not included to the activity list, that need Screening in Environmental Impact Assessment or Comprehensive Environmental Impact Assessment.

The installation process is done in the existing building or other already existing infrastructure.

## 4.10 Storage of electricity

The Group owns and operates pumped storage hydropower facility - Kruonis PSHP. Its capacity is 900 MW of 4 units (225 MW each). Eight units of 200 MW were planned for the initially designed electrical capacity of 1600 MW, but later this amount was reduced to four units with increased capacity of 225 MW each. The Group is currently in under construction stage for the additional 5th unit next to the existing four, based on previously designed capacity.

Kruonis PSHP is primarily used to balance electricity supply and demand. The Group meets substantial contribution criteria by operating this pumped hydropower storage facility.

Furthermore, this activity does no significant harm to other environmental objectives.

### Adaptation to climate change

See Climate Change adaptation part.

### Sustainable use and protection of water and marine resources

The Law on Water of the Republic of Lithuania, which regulates public relations arising from the use, management and protection of surface and underground water bodies and the water contained in them in the territory of the Republic of Lithuania, and which applies to persons who dispose of surface water bodies, manage, use and / or protect surface and / or underground water bodies and the water contained in them in the territory of the Republic of Lithuania, is the main national legal act transposing requirements of the Directive 2000/60/

EC into national legislation. Based on Article 15 point 1 of the Law on Water, ponds are installed, and the maintenance of these surface water bodies are carried out in accordance with the description of the procedure approved by the Minister of the Environment. The use and maintenance of ponds is regulated by Typical rules for use and maintenance of ponds (LAND 2-95), which sets the framework for water management rules. Based on this framework, the rules for the use and maintenance of Kaunas HP lagoon have been prepared by Ignitis Gamyba (Green Capacities) and approved by the Environmental Protection Agency in 2016. These rules are a specific tool enabling environmental institutions to control activities in the pond. The annual reports of performance in accordance with the LAND 2-95 requirements are provided to the Lithuanian Environmental Protection Agency.

In accordance with the Article 9 part 3 of the Law on Water, Kruonis PSHP is a water user and has a mandatory Pollution permit, whose issuing procedure is regulated by the Law on Environmental Protection.

Water indicators that are monitored and reported:

- A. water intake (thousand m<sup>3</sup>):
- 1) groundwater;
  - 2) municipal water supply or other water supply facilities;
  - 3) surface waters;
  - 4) extracted and reused (surface);
- B. water consumption (thousand m<sup>3</sup>).

### Transition to a circular economy

All waste generated during the activity is managed in accordance with waste management requirements based on national law. A waste management plan is in place and ensures possible recycling. All waste

generated is handed over to the waste manager.

### The protection and restoration of biodiversity and ecosystems

It is important to note, that the construction of Kruonis PSHP started in 1978 and its operation began in 1992, before the network of protected areas were established. During the construction of Kruonis PSHP 4 units, all existing Environmental requirements and laws were assessed and met to complete the construction. In early 1990s, the impact to the environment were re-assessed to assure the required mitigation and compensation measures for protecting the environment to be implemented.

Currently, Kruonis PSHP has a mandatory Pollution permit, whose issuing procedure is regulated by the Law on Environmental Protection. Kruonis activity is assessed through the annual environmental monitoring of biodiversity of Kaunas lagoon, which is part of National monitoring programme.

The main impact on the natural environment in these areas is related to the fluctuation of the water level in the Kaunas lagoon. The values and protected species of special protection area under the Habitats Directive are not adversely affected by the fluctuations of water levels in Kaunas lagoon.

During the activities of Kruonis PSHP, safety requirements and typical rules for the use and maintenance of ponds are observed, so there is no significant impact on the state of fish and bird populations. Every year, between the month of March and July, the impact of water level fluctuations on fish and bird populations in the Kaunas lagoon are monitored by the scientists of Nature Research Centre.

Automatic water level recording facilities are installed, and operation is regulated accordingly based on existing water levels.

For the 5<sup>th</sup> unit, the Screening in Environmental Impact Assessment was conducted and the required mitigation and compensation measures for protecting the environment are implemented.

## 4.20 Cogeneration of heat / cool and power from bioenergy

Vilnius cogeneration unit (Vilnius CHP) has both, biomass and waste, boilers for heat and electricity production. The Vilnius CHP plant (both biomass and waste-to-energy) is among the most modern in Europe in terms of environmental protection and energy generation technologies. Only biomass plant is analysed for Taxonomy-alignment as only this activity is Taxonomy-eligible and have technical screening criteria.

Substantial contribution criteria for Vilnius CHP biomass plant have been carefully assessed and we conclude that this activity of the Group substantially contributes to climate change mitigation:

- 1) agricultural biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive;
- 2) the greenhouse gas emission savings from the use of biomass in cogeneration installations are at least 80 % in relation to the GHG emission saving methodology set out in Annex VI to Directive (EU) 2018/2001;
- 3) cogeneration in Vilnius CHP biomass plant does not rely on anaerobic digestion of organic material and this requirement is not relevant to Vilnius CHP biomass plant.

Furthermore, this activity does not have significant harm to other environmental objectives.

### Adaptation to climate change

See Climate Change Adaptation part.

### Sustainable use and protection of water and marine resources

Environmental degradation risks related to preserving water quality and avoiding water stress are identified and addressed. Surface and production wastewater does not enter the environment - it is directed to the networks of wastewater managers (as described in the EIA). Groundwater monitoring is also carried out. Furthermore, condensate is used for recirculation of water resources.

### Pollution prevention and control

After comparing the limits of emissions in Integrated pollution prevention and control permits and the latest relevant best available techniques (BAT) conclusions, it was concluded, that emissions are within or lower than the emission levels associated with the best available techniques (BAT-AEL) ranges.

### The protection and restoration of biodiversity and ecosystems

The Comprehensive Environmental Impact Assessment has been carried out and the activity complies with its requirements. Vilnius CHP biomass plant does not fall into the protected or Natura 2000 territories and has no boundaries with them. There is no valuable vegetation on the plot, and there are no animals and plant species included in the lists of protected species. There are no cultural heritage objects on the plot.



Kelmė wind farm, Lithuania

## 4.24 Production of heat / cool from bioenergy

The Elektrėnai Complex contains a biomass boiler house which produces only heat through the combustion of wood chip and has an installed thermal capacity of 40 MW.

Substantial contribution criteria for the biomass boiler in Elektrėnai Complex has been carefully assessed and we conclude that this activity of the Group substantially contributes to climate change mitigation:

1. Agricultural biomass used in the activity for the production of heat and cool complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive.
2. The greenhouse gas emission savings from the use of biomass in biomass boiler are at least 80% in relation to the GHG emission saving methodology and fossil fuel comparator set out in Annex VI to Directive (EU) 2018/2001.
3. Biomass boiler does not rely on anaerobic digestion of organic material, so this requirement is not relevant.

Furthermore, this activity does no significant harm to other environmental objectives.

### Adaptation to climate change

See Climate Change Adaptation part.

### Sustainable use and protection of water and marine resources

Environmental degradation risks related to preserving water quality and avoiding water stress are identified and addressed.

Water quality monitoring of discharged wastewater is being carried out. Surface and production wastewater is directed to the Streva River. Monthly samples of discharged wastewater from the outlet are taken by our chemical laboratory, which also prepares wastewater test protocols. A part of testing is ordered from a certified company (our chemical laboratory has the right to determine the concentration of some pollutants, others are determined by a third party). These tests of discharge wastewater are declared to the Environment Protection Agency. A Communal wastewater and wastewater from biomass boiler's economizers are directed to the biological treatment facilities of the city of Elektrėnai. The groundwater monitoring is also being carried out in the Elektrėnai Complex (near the biomass boiler site). Our B-5a Instruction on Avoidance of Discharge of Unauthorized Pollutants with Wastewater and Liquidation of Consequences are followed to ensure non-exceeding pollution of wastewater in the event of accidents.

### Pollution prevention and control

The biomass boiler has Integrated Pollution Prevention and Control Permit and emission limit values are set with it. These values do not meet

required limits, though, air monitoring are conducted and results of them are within required limits.

In addition, the impact of the biomass boiler plant on the environment is assessed according to the methodology provided by the Environmental Monitoring Program. Mathematical modelling of pollution is carried out at least once every 5 years.

### The protection and restoration of biodiversity and ecosystems

The Comprehensive Environmental Impact Assessment has been carried out and biomass boiler complies with it. The biomass boiler does not fall into the protected or "Natura 2000" territories and has no boundaries with them. There is no valuable vegetation on the plot, and there are no animals and plant species included in the lists of protected species. There are no cultural heritage objects on the plot.

## 6.5 Transport by motorbikes, passenger cars and light commercial vehicles

The Group has acquired electric vehicles (low- and zero-emission light-duty vehicles) that meet the substantial contribution criteria.

### Adaptation to climate change

See Climate Change Adaptation part.

### Transition to a circular economy

All purchased vehicles meet recyclability requirement.

### Pollution prevention and control

Vehicles comply with the most recent applicable light-duty vehicle emission requirements, as well as tyre rolling noise requirements.



## 6.15 Infrastructure enabling low-carbon road transport and public transport

The Group offers electric car charging solution for its customers, encompassing the biggest fast charging network for electric vehicles in Lithuania.

Furthermore, this activity does no significant harm to other environmental objectives.

### Adaptation to climate change

See Climate Change Adaptation part.

### Sustainable use and protection of water and marine resources

Installation of EV charging stations to the network are not impacting water resources and all procedures of the construction follows all necessary requirements in accordance with the existing law.

### Transition to a circular economy

All waste generated during installation of EV charging station is managed in accordance with waste management requirements set in the existing law.

### Pollution prevention and control

Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works in accordance with the existing law.

### The protection and restoration of biodiversity and ecosystems

Measures are taken in accordance with the existing requirements to carry EV charging station installation with minimum impact to biodiversity. Most of the EV stations are installed in the existing infrastructure.

## 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)

The Group offers electric vehicles (EV) charging stations for its customers together with installation services and other equipment needed for EV charging. By providing this service and operating this activity, the Group substantially contributes to climate change mitigation.

Furthermore, this activity does no significant harm to other environmental objectives.

### Adaptation to climate change

See Climate Change Adaptation part.

## 7.6 Installation, maintenance and repair of renewable energy technologies

The Group offers solar energy power plants (PV) installation for its customers, which consists of photovoltaic plant panels, inverters, mounting structures, installation services and all other needed equipment. The Group substantially contributes to climate change mitigation by offering installation, maintenance and repair of solar photovoltaic systems and the ancillary technical equipment.

Furthermore, this activity does no significant harm to other environmental objectives:

### Adaptation to climate change

See Climate Change Adaptation part.

## DNSH: Climate change adaptation

The energy sector is witnessing an increasing pressure from climate change. Global warming, more variable precipitation patterns, rising sea levels and extreme weather events already pose a significant challenge to the resilience of energy sector, and increase the likelihood of climate-related physical risks. Noting this increasing relevance of climate-related risks, both physical and transitional, the Group has fully integrated them into the overall risk management process. Our processes for identifying, assessing, and managing climate-related risks follow the same procedures as for assessing other risks (strategic, operational, financial, external). Our employees are trained and consulted on climate-related risks, their possible impact on business and processes, which increases the Group's ability to timely identify and manage climate-related risks.

For more information on Risk Management, read section '4.7 Risk management' of the Group's [Integrated Annual Report 2024](#).

The physical climate-related risks have a potential to adversely impact the Group's operations and interrupt the supply of energy to our customers. Changes in wind patterns or sunlight intensity can determine the output of our Green Capacities

Portfolio assets. Extreme weather events, such as winter storms, can impact the resilience of our distribution networks. Rising global temperature and occurrence of heat waves change patterns of energy demand. For all those reasons, the Group has management methods in place, such as monitoring short- and long-term weather forecasts, business continuity plans and investment programmes to improve its infrastructure resilience. Depending on the activity, climate-related resilience is covered in their investment plans, for example, Networks invest largely in cabling of overhead lines. All our Taxonomy-eligible activities, depending on their location and activity features, have discussed and if relevant identified possible climate-related risks and manage them if needed.

Noting that the Group's operations including Taxonomy-eligible activities are not immune to the effects of climate change, in 2023 the Group conducted a climate change scenario analysis (CSA). The Double Materiality Assessment (DMA) conducted in 2024 furthermore utilised assumptions that were used in CSA. In collaboration with a leading climate consultancy, the Group aimed to check its strategy resilience to climate-related issues and whether all opportunities have been identified. For more information on the climate change adaptation, read section '6.2 Environment' of the Group's [Integrated Annual Report 2024](#).

## Minimum social safeguards

The Group conducts activities by ensuring the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. The Group respects human rights and has established both the Group [Code of Ethics](#) and the [Group Supplier Code of Ethics](#). Under the Code of Ethics, the Group is committed to respect and protect human rights and freedoms, recognised in national and international legislation, disseminate and foster democratic values in accordance with the guidelines set forth in the Universal Declaration of Human Rights and International Labour Organization Conventions (including conventions on the worst forms of child labour, maternity protection, etc.). The Group Supplier Code of Ethics sets out the minimum standards of business conduct that we expect all our suppliers to adhere to and, where possible, exceed. We request our suppliers to carry out their activities under the Group Supplier Code of Ethics, including the suppliers respecting and protecting the human rights and freedoms.

In addition to that, the Group People and Culture Policy, Equal Opportunity and Diversity Policy, Occupational Health and Safety Policy, Anti-Corruption Policy, Market Abuse Prevention Policy and Information Security Policy cover different aspects of human rights or other aspects of social

safeguards that are at the highest importance to the Group. Please find the list of Group's public policies available [here](#).

The Group is actively working to enhancing its human rights due diligence process, not only to ensure the compliance with minimum social safeguards but also to begin preparation for the upcoming new regulations. The Group has prepared a roadmap for Corporate Sustainability Due Diligence Directive implementation and will work on its actions.

Together with our good governance practices and policies mentioned above, the Group implements ongoing systematic due diligence approach, encompassing identification, prevention, mitigation and accountability steps to ensure that we have robust minimum safeguards in place on human rights, anti-corruption, taxation, and fair competition. For more information on impact assessments and stakeholder involvement, read section '6.1 ESRS 2: General information', more on social impacts, read section '6.3 Social', more on business conduct, read section '6.4 Governance', more on risk management, read section '4.7 Risk Management' of the Group's [Integrated Annual Report 2024](#).

## Not Taxonomy-aligned activities

### 4.29 Electricity generation from fossil gaseous fuels

The Group operates Elektrėnai Complex, which contains two gas-fired reserve power units, units 7 and 8 (together, the "Reserve Power Units"), and the combined cycle gas turbine unit CCGT, with a combined gross installed capacity of 1,055 MW. The Reserve Power Units have an installed capacity of 300 MW each, while the CCGT unit has an installed capacity of 455 MW. The Reserve Power Units have an average asset useful life of more than 50 years, while the CCGT has an average asset useful life of 25 to 35 years.

The units in the Elektrėnai Complex have a diversified age profile. Construction of the CCGT unit was completed in October 2012 whereas the construction of the currently operational Reserve Power Units was completed between 1971 to 1972 (with a major refurbishment from 2003 to 2009). The Group has a schedule of regular repairs and overhauls for its power plants. Two power generation units in the Elektrėnai Complex (with a combined capacity of 300 MW) were decommissioned in 2012. Four additional units (with a combined capacity of 900 MW) were decommissioned in 2015 and 2016. The Group, through its subsidiary Ignitis Gamyba (Reserve Capacities), has permits for an indefinite term to engage in electricity generation activities at the Reserve Power Units and the CCGT unit.

Electricity generation from fossil gaseous fuels activity at the Group does not meet substantial contribution criteria and is concluded as not aligned. Even though, our combined cycle gas turbine has

replaced older ineffective fossil fuel fired units it is still not sufficient to meet the technical screening criteria. Furthermore, as of now, it is not possible to replace gas to renewable and / or low-carbon gaseous fuels, but we are following R&D in this field.

All three gas-fired plants have to meet strict national environmental requirements, they are operated in accordance with the conditions of permits for Integrated Pollution Prevention and Control issued by the Environmental Protection Agency. This permit is a way to ensure that the activities of companies have as little impact on the environment as a whole and to individual parts of it – all possible types of environmental impact of economic activities are analysed, and the impacts are properly managed during the performance of activities.

It is important to note, that Reserve Power Units and the combined cycle gas turbine unit (CCGT) takes an important role in assuring flexible generation and energy security in the Republic of Lithuania. These assets are used to provide power reserve and ancillary services to the transmission system operator TSO (Litgrid). The main goal of these services is to ensure the stability and flexibility of the energy system, help to prevent and respond to system emergencies and maintain the required power reserve in line with the established requirements for the quality and reliability of electricity supply.

Knowing that this business segment of the Group is largely regulated by the state, we aim to contribute to the synchronisation with the grid of continental Europe in 2025, before that no major changes are expected.

### 6.5 Transport by motorbikes, passenger cars and light commercial vehicles and 6.6 Freight transport services by road

Part of transport owned and operated by the Group companies do not meet the 6.5 substantial contribution criteria and is not assessed for DNSH further, therefore is considered as not aligned.

### 7.7 Acquisition and ownership of buildings

Most of the buildings owned by the Group are facilities there previously mentioned Taxonomy-eligible activities are operated. Nonetheless, we have reviewed all our ownership of buildings and conclude, that the Group owns one administrative building through its subsidiary company – Transporto Valdymas. This building is renovated but does not meet high energy efficiency class requested to meet substantial contribution criteria.

The Group also owns and rents other buildings through its subsidiary company – Ignitis Gamyba (Reserve Capacities and Green Capacities). These buildings do not have high energy efficiency and we consider them not aligned as well

## V. Accounting policies

### Main principles

Our accounting methodology for calculating the key performance indicators required to be disclosed by Taxonomy Regulation (KPI) is based on the Group's best interpretation of the EU Commission Delegated Regulation 2021/2178 and the currently available guidelines from the European Commission. With regards to the limited industry-specific guidance, the Group made several assumptions to practically implement the Taxonomy Regulation. With the new official guidance from the European Commission or the industry's best practices, these assumptions will be amended and disclosed accordingly, if needed.

While Taxonomy Regulation requires to disclose the share of revenue, Taxonomy OPEX and Taxonomy CAPEX KPIs that are Taxonomy-aligned and/or Taxonomy-eligible, the Group voluntarily discloses the Adjusted EBITDA metric as it provides coherence with other KPIs and better reflects how much the Group's growth is linked to Taxonomy-aligned and/or Taxonomy-eligible activities. Adjusted EBITDA is calculated based on the methodology determined by the Group as it's not part of the EU Commission Delegated Regulation 2021/2178.

Taxonomy-eligible/aligned KPIs are calculated as the KPIs associated to each specific Taxonomy-eligible/aligned activity divided by the Group's

total KPIs. While calculating the numerators, KPIs were allocated to Taxonomy-eligible/aligned activities based on the eligibility and the alignment assessment described in the previous paragraphs. The assumption was made that any revenue, Adjusted EBITDA, Taxonomy OPEX, or Taxonomy CAPEX that can be justifiably linked to an identified Taxonomy-eligible/aligned economic activity will be classified as Taxonomy-eligible/aligned accordingly. Revenue and Adjusted EBITDA KPIs are directly linked to the ratios used in the Group's Integrated Annual Report and financial statements, whereas Taxonomy OPEX and Taxonomy CAPEX refers to the type of costs or additions required by Taxonomy Regulation. For the consolidated EU Taxonomy figures, most consolidation adjustments are made in line with the principles used in the Consolidated financial statements.

### Double counting

All reported Taxonomy KPIs exclude double counting, as the numerator is allocated to different activities, which are either independent or proxies, to split the financial numbers into the applicable Taxonomy-eligible/aligned activities. The Group considers that all its Taxonomy-eligible economic activities contribute to a climate change mitigation, therefore, they are reported only under this objective.

### Proxies

Where the financial numbers cannot be directly allocated to a specific activity, proportional accounting has been used for the allocation. Proportional accounting is mostly related to the indirect costs where allocation is done using proxies primarily based on employee work time allocated to specific activities. These proxies are calculated while taking into consideration planned and/or current and/or historical data on employees' resources dedicated to an activity.

### Calculation of Taxonomy-eligible/aligned revenue

As defined in the EU Commission Delegated Regulation 2021/2178, the share of the Group's Taxonomy-eligible/aligned revenue is calculated as the revenue derived from products or services associated with Taxonomy-eligible/aligned economic activities divided by the Group's total revenue (see '8.1 Consolidated statement of profit or loss').

Revenue associated with the storage of electricity, electricity generation from hydropower, fossil gaseous fuels, wind power, electricity generation using solar photovoltaic technology, cogeneration of heat/cool and power from bioenergy includes revenue associated with Kruonis PSHP, Kaunas HPP,

CCGT, units 7 and 8 at Elektrėnai Complex, wind and solar farms and Vilnius CHP biomass unit, while also including the revenue of balancing activities and/or hedging, and/or regulatory activities, where the result includes figures not necessarily from the generation of electricity (for more information on regulatory activities, see section '6.4 Governance' of this report) but which are directly related to or necessary to perform Taxonomy-eligible/aligned activities. An exception was made for 2023 when classifying the sale of natural gas (EUR 30.9 million) as Taxonomy-non-eligible as it was acquired for fixing a positive forward Clean Spark Spread, but the transaction was mainly closed without physical delivery.

### Calculation of Taxonomy-eligible/aligned Taxonomy OPEX

As it is defined in the EU Commission Delegated Regulation 2021/2178, the share of the Group's Taxonomy-eligible/aligned OPEX is calculated as the Taxonomy OPEX related to assets or processes associated with Taxonomy-eligible/aligned economic activities divided by the total Taxonomy OPEX of the Group.

Taxonomy OPEX numerator includes operational expenses related to repairs & maintenance and short-term leases, whereas denominator additionally includes IT maintenance costs. Currently, the scope of OPEX included in the Article

8 of the Disclosures Delegated Act is open to interpretation, and there is a lack of industry-specific guidelines providing appropriate inclusions, therefore, the Group calculated Taxonomy OPEX based on the currently available information. Where the operating expenses were not material at the Group level, they may have been excluded from the numerator, while the total Taxonomy OPEX was included in the denominator. An example of such exclusion could be the Taxonomy OPEX related to administrative buildings owned and used by the Group (7.7 Acquisition and ownership of buildings) as they are often an integral part of generation units and the significance of such expenses at the Group level is low.

Due to lack of precise allocation tools within the Group's accounting system and the uncertainties mentioned before, there are temporary limitations to the Taxonomy OPEX calculations, which include the following:

- We cannot objectively evaluate the type of IT maintenance costs that could be justifiably included; thus, we use a conservative approach and include all IT maintenance costs to the denominator, but do not include any costs to the numerator.
- Operational expenses related to the cost of employees and/or third-party services to ensure the continued and effective functioning of these assets as well as repairs & maintenance expenses of transport vehicles are not included neither in the numerator, nor in the denominator.

In further reporting periods, the Group is planning to continue improving current processes to ensure a more precise reflection and consistent application of Taxonomy OPEX.

It should be noted that there are differences in methodologies used to calculate OPEX and Taxonomy OPEX (see the table on the right). Total OPEX reported by the Group in 2024 was EUR 329.6 million, whereas the total Taxonomy OPEX – EUR 78.6 million. For detailed definition of Taxonomy OPEX and OPEX formulas, see section '7.3 Alternative performance measures' of this report.

**Calculation of Taxonomy-eligible/aligned Adjusted EBITDA**

Taxonomy-eligible/aligned Adjusted EBITDA is disclosed on a voluntary basis and calculated based on the methodology determined by the Group as it is not part of the EU Commission Delegated Regulation 2021/2178. The share of the Group's Taxonomy-eligible/aligned Adjusted EBITDA is calculated as the Adjusted EBITDA associated with Taxonomy-eligible/aligned economic activities divided by the Group's total Adjusted EBITDA (see section '3.1 Annual results', part 'EBITDA'), whose calculation methodology is described in section '7.3 Alternative performance measures'. Inclusions and adjustments have been made mostly based on the principles described in the section above 'Calculation of Taxonomy-eligible/aligned revenue' and proxies were used, where appropriate.

**Calculation of Taxonomy-eligible/aligned Taxonomy CAPEX**

As defined in the EU Commission Delegated Regulation 2021/2178, the share of the Group's Taxonomy-eligible/aligned CAPEX is calculated as the CAPEX related to assets or processes associated with Taxonomy-eligible/aligned economic activities divided by the total Taxonomy CAPEX of the Group, which is calculated based on

	Investments <small>APM</small>	Taxonomy CAPEX <small>APM</small>
Additions of property, plant and equipment (PPE), including acquisitions through business combinations	✓	✓
Additions of Intangible assets (IA), including acquisitions through business combinations, except goodwill and contingent considerations	✓	✓
Goodwill	✓	
Contingent considerations (business combinations)		✓
Additions of investment property, including acquisitions through business combinations	✓	✓
Additions of right-of-use assets		✓
Additions of other financial assets, including acquisitions through business combinations	✓	
Prepayments for property, plant, and equipment (PPE) and non-current assets reclassified to additions of property, plant and equipment (PPE) or intangible assets (IA)	✓	
Capital granted (related with development projects with no controlling interest by the Group)	✓	

	OPEX <small>APM</small>	Taxonomy OPEX <small>APM</small>
Salaries and related expenses	✓	
Repair and maintenance expenses	✓	✓
Other expenses	✓	Only IT maintenance and short-term lease

IAS 16 (73: 1 (i) and (iii)), IAS 38 (118: (e) (i)), IAS 40 (76: (a)), and IFRS 16 (53: (h)) (see section '8 Consolidated financial statements', '11 Intangible assets' (under 'Additions' and 'Acquisition through business combination'), '12 Property, plant and equipment' (under 'Additions' and 'Acquisition through business combination'), '13 Right-of-use assets' (under 'Additions')). Goodwill acquired through business

combinations was excluded from the Taxonomy CAPEX KPI.

In this report, Taxonomy CAPEX related to Taxonomy-aligned activities was disclosed as follows, based on the circumstances:

- If the asset has become operational during the reported financial period, the Taxonomy CAPEX

related to expansion was reported as Taxonomy-aligned.

- If the project was not completed in the year 2024, but the Final Investment Decision (FID) was made regarding the project and it was a part of the Taxonomy CAPEX plan, Taxonomy CAPEX was reported as Taxonomy-aligned. In terms of the alignment with TSC for climate change mitigation, actions have been already taken and differ depending on the project's development stage to ensure the alignment of each project.
- Following the publication of an additional FAQ on the EU Taxonomy on 29 November 2024 (Section II, point 23), all the Taxonomy CAPEX related to the projects regarding which the Final Investment Decision (FID) was not made were conservatively treated as Taxonomy-non-eligible, even if the activity was assessed as Taxonomy-aligned during the eligibility and assessment analysis. Given the uncertainty in the interpretation of the above-mentioned FAQ, after further clarification, these assumptions might be modified and changes disclosed accordingly in the future reporting, if necessary.
- If the Taxonomy CAPEX is related to the activities where the amount of investment is small or fractional and, therefore, the timeframe to become partially/fully operational is short (e.g. electricity network expansion/maintenance, EV network expansion, investments in smart meters, etc.), it was reported as Taxonomy-aligned, assuming that 1) there is no or insignificant risk of non-completion and 2) compliance with the technical screening criteria (TSC) is determined through the general assessment of the Taxonomy-eligible activities.

It should be noted that there are differences in methodologies used to calculate Investments and Taxonomy CAPEX (see the table on the previous page). Total Investments reported by the Group in 2024 were EUR 812.0 million, whereas total Taxonomy CAPEX – EUR 896.9 million. For detailed definition of Taxonomy CAPEX and Investments formulas, see section '7.3 Alternative performance measures' of this report.

#### Changes in calculations

Following the annual revision, several changes have been made, which are related to more precise findings after thorough analysis or correction of minor technical errors, which, after corresponding recalculation of the 2023 figures, allow for more precise disclosure of the EU Taxonomy KPIs:

- Following the publication of an additional FAQ on the EU Taxonomy on 29 November 2024, the Taxonomy CAPEX as well as Taxonomy CAPEX plan have also been revised and corresponding changes have been made (activities '4.1 Electricity generation using solar photovoltaic technology', '4.3 Electricity generation from wind power', '4.10 Storage of electricity') for both 2023 and 2024 based on the best interpretation of new clarifications (see paragraph 'Calculation of Taxonomy-eligible/aligned Taxonomy CAPEX'). These changes affected the total amount of the Taxonomy CAPEX plan, the term of the Taxonomy CAPEX and the Taxonomy CAPEX KPI.
- Additions related to right-of-use assets for 2023 have been revised in both numerator and denominator due to a technical error identified, which in turn also slightly affected the Taxonomy CAPEX KPI.
- As it was mentioned in 'Eligibility assessment' paragraph of this section, after the annual eligibility and alignment assessment, part of financial figures previously reported under the activity '7.6 Installation, maintenance and repair of renewable energy technologies', were classified as Taxonomy-non-eligible.
- After revision of financial inclusions, it was noticed that part of the figures related to the '7.6 Installation, maintenance and repair of renewable energy technologies' and '6.15 Infrastructure enabling low-carbon road transport and public transport' activities were not included in the numerator, therefore both 2023 and 2024 data were recalculated respectively.
- Other minor changes are related to a more precise assessment of Taxonomy OPEX inclusions and other adjustments of technical origin made in both 2023 and 2024 data, which ensured a more precise disclosure.

## VI. Contextual information about Taxonomy Regulation KPIs

### Revenue KPI

Taxonomy-eligible share of revenue in 2024 was 45.9% (EUR 1,058.3 million) and increased by 14.5 pp compared to 2023, whereas Taxonomy-aligned share was 39.5% (EUR 912.1 million) and increased by 11.7 pp.

The key drivers behind the Taxonomy-aligned share of revenue increase were:

- the increase in revenue of Taxonomy-aligned activities, with major increases in: i) revenue of electricity transmission and distribution (EUR 118.7 million), mostly due to higher revenue from electricity transmission activities, ii) revenue of cogeneration of heat/cool and power from bioenergy (Vilnius CHP biomass unit) and electricity generation from wind power (wind farms) (EUR 78.7 million) due to the launch of new assets and higher captured electricity prices;
- the decrease in revenue of Taxonomy-non-eligible activities (EUR -499.6 million), which was mainly driven by a decrease in revenue of both natural gas and electricity supply;
- the increase was partly offset by higher revenue of Taxonomy-eligible but not aligned activities, which was mainly affected by electricity generation from fossil gaseous fuels, which in 2024 increased by EUR 53.2 million. The increase was mainly driven by favourable market conditions, utilisation of all three units at Elektrėnai Complex and increased

electricity generation related to provision of aFRR balancing capacity services, in relation to the synchronisation of the Baltic electricity systems with the Continental Europe Synchronous Area. This effect was also the main difference between Taxonomy-eligible and Taxonomy-aligned revenues.

Taxonomy-aligned revenue in 2024 consists only of revenue from contracts with customers. In 2024, there were no significant amounts related to Taxonomy-aligned activities pursued for the Group's own internal consumption.

Throughout the reporting period, the Group has not issued new environmentally sustainable bonds or debt securities with the purpose of financing Taxonomy-aligned activities. Nevertheless, it must be noted that the Group has issued two green bonds in 2017 and 2018, where part of the funds was used to finance Taxonomy-aligned activities.

### Taxonomy OPEX KPI

Taxonomy-eligible share of Taxonomy OPEX in 2024 was 74.7% (EUR 58.7 million) and increased by 0.1 pp compared to 2023. Taxonomy-aligned share of Taxonomy OPEX in 2024 was 66.7% (EUR 52.4 million) and remained stable compared to 2023.

Taxonomy-aligned share of OPEX was mostly affected by:

- the increase in repairs and maintenance expenses related to Taxonomy-aligned activities, which amounted to EUR 51.5 million and were EUR 4.3 million higher compared to 2023. The increase was mostly related to the start of commercial operations of Vilnius CHP biomass unit in Q2 2024;
- the increase in short-term lease expenditures associated with Taxonomy-aligned activities, which amounted to EUR 0.9 million and were EUR 0.4 million higher compared to 2023;
- the increase was partly offset by IT maintenance expenses, which increased by EUR 1.4 million and are all reported as Taxonomy-non-eligible (included in the denominator only), thus they have a negative effect on the Taxonomy-aligned OPEX KPI.

The difference between Taxonomy-eligible and Taxonomy-aligned OPEX is mostly related to electricity generation from fossil gaseous fuels, which is not Taxonomy-aligned.

Maintenance materials are reported together with other repairs and maintenance operational expenses. IT maintenance costs are included in the denominator only, whereas the salary expenses relating to the day-to-day servicing of the assets and the transport vehicle repair expenses are not included neither in the numerator, nor in the denominator, but are planned to be included in further reports with a fine-tuned reporting process.

### Adjusted EBITDA KPI

Taxonomy-eligible share of Adjusted EBITDA in 2024 was 80.0% (EUR 422.3 million) and increased by 13.9 pp compared to 2023. Taxonomy-aligned share of Adjusted EBITDA in 2024 was 72.0% (EUR 380.2 million) and increased by 10.5 pp compared to 2023.

The increase of Taxonomy-aligned share of Adjusted EBITDA was mostly driven by:

- the increase in Adjusted EBITDA of Taxonomy-aligned activities, with major increases in: i) Adjusted EBITDA of electricity distribution, mostly due to higher WACC and RAB, ii) Adjusted EBITDA of storage of electricity (Kruonis PSHP), cogeneration of heat/cool and power from bioenergy (Vilnius CHP biomass unit), electricity generation from wind power (wind farms), hydropower (Kaunas HPP) and using solar photovoltaic technology (solar farms) due to the launch of new assets and higher captured electricity prices;
- the decrease of the share generated by Taxonomy-non-eligible activities, mostly due to the lower Adjusted EBITDA of B2B natural gas supply business;
- the increase was partly offset by higher Adjusted EBITDA of Taxonomy-eligible but not aligned activities, which was majorly affected by higher result of electricity generation from fossil

gaseous fuels, driven by the utilised option to earn additional return in the market on top of the regulated return. This effect was also the main difference between the Taxonomy-eligible and the Taxonomy-aligned Adjusted EBITDA.

### Taxonomy CAPEX KPI

Taxonomy-eligible share of Taxonomy CAPEX in 2024 was 92.7% (EUR 831.3 million) and increased by 0.5 pp compared to 2023. Taxonomy-aligned share of Taxonomy CAPEX in 2024 was 92.0% (EUR 825.2 million) and increased by 0.4 pp compared to 2023.

The main effects related to the higher Taxonomy-aligned share of Taxonomy CAPEX were:

- the increase in additions related to property plant and equipment of Taxonomy-aligned activities, which amounted to EUR 775.4 million and were EUR 123.2 million higher compared to 2023. The increase was mostly related to the investments into electricity generation from wind power (wind farms), electricity generation using solar photovoltaic technology (solar farms), storage of electricity (Kruonis PSHP expansion project) and infrastructure enabling low-carbon road transport and public transport (EV network);
- the increase in additions related to right-of-use assets of Taxonomy-aligned activities, which accounted for EUR 26.9 million and were EUR 21.0 million higher compared to 2023, mainly due to the investments into electricity generation from wind power (wind farms), electricity generation using solar photovoltaic technology (solar farms) and infrastructure enabling low-carbon road transport and public transport (EV network).

- the increase was partly offset by lower acquisitions through business combinations related to Taxonomy-aligned activities, which amounted to EUR 15.4 million in 2024 and were EUR 112.2 million lower compared to 2023. The decrease was mainly related to electricity generation from wind power (wind farms);
- the increase was partly offset by a decrease in additions of intangible assets related to Taxonomy-aligned activities, which amounted to EUR 9.6 million in 2024 and were EUR 3.1 million lower compared to 2023. The decrease was mainly related to electricity generation using solar photovoltaic technology (solar farms) and installation of smart metering systems.

In 2024, Taxonomy CAPEX considered as Taxonomy-aligned in accordance with the Taxonomy CAPEX plan was EUR 278.7 million for Electricity generation from wind power (4.3CCM), EUR 114.5 million for Electricity generation using solar photovoltaic technology (4.1CCM), and EUR 26.2 million for Storage of electricity (4.10CCM) activities. In the period 2024–2027, the Taxonomy CAPEX plan for these activities is expected to be between EUR 0.8–1 billion. It is worth noting, that Taxonomy CAPEX plan does not include potential future Investments for the expansion of Taxonomy-aligned activities, that has not yet been started but might or might not be started in the future. It is also worth noting that the actual Taxonomy CAPEX amount incurred might differ from the estimate provided for future periods in the Taxonomy CAPEX plan due to external and internal factors (including but not limited to, inflation, project rescheduling, etc.). In addition to this, Taxonomy CAPEX, related

### Explanation of abbreviations (notes for the tables in the following pages)

	Y	Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
Substantial contribution criteria	N	No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective
	N/EL	Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective
DNSH criteria and Minimum safeguards	Y	Yes
	N	No
Objective	CCM	Climate change mitigation
	CCA	Climate change adaptation

to Taxonomy-aligned activities' expansion (4.1CCM, 4.3CCM, 4.10CCM), where the projects did not have the Final Investment Decision made, thus were not included in the Taxonomy CAPEX plan and the numerator of Taxonomy CAPEX KPI, in 2024 was EUR 23.5 million (EUR 29.9 million in 2023).

Throughout the reporting period, the Group has not issued new environmentally sustainable bonds or debt securities with the purpose of financing Taxonomy-aligned activities. Nevertheless, it must be noted that the Group has issued two green bonds in 2017 and 2018, where part of the funds was used to finance Taxonomy-aligned activities.



## VII. Revenue under the Taxonomy Regulation

### Revenue under the Taxonomy Regulation

Financial year 2024	2024	Substantial contribution criteria								DNSH criteria							Proportion of Taxonomy-aligned or eligible revenue 2023 <sup>2</sup>	Category enabling activity	Category transitional activity
Economic activities under Taxonomy Regulation	Codes	Revenue	Proportion of revenue	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity	Minimum safeguards			
		EURm	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N			
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Electricity generation using solar photovoltaic technology	CCM 4.1 / CCA 4.1	0.6	0.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	-	-	Y	Y	Y	-	-	-
Electricity generation from wind power	CCM 4.3 / CCA 4.3	79.4	3.4%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	-	-	Y	Y	Y	1.7%	-	-
Electricity generation from hydropower	CCM 4.5 / CCA 4.5	67.2	2.9%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	-	-	Y	Y	2.4%	-	-
Transmission and distribution of electricity	CCM 4.9 / CCA 4.9	589.5	25.6%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	Y	Y	18.5%	E	-
Installation of equipment such as, but not limited to future smart metering systems or those replacing smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council	CCM 4.9 (f)	-	-	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	Y	Y	-	E	-
Storage of electricity	CCM 4.10 / CCA 4.10	117.1	5.1%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	Y	-	Y	Y	Y	4.1%	E	-
Cogeneration of heat/cool and power from bioenergy	CCM 4.20 / CCA 4.20	51.0	2.2%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	-	Y	Y	0.3%	-	-
Production of heat/cool from bioenergy	CCM 4.24 / CCA 4.24	4.8	0.2%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	-	Y	Y	0.2%	-	-
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5 / CCA 6.5	-	-	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	-	Y	-	-	-

<sup>1</sup> The primary objective of our activities is to contribute to climate change mitigation, therefore they are not fully assessed for climate change adaptation and disclosed as not aligned.

<sup>2</sup> These figures have been restated compared to the Integrated Annual Report 2023. For more information, see section '7.2 Notes on restated figures' of this report.

Revenue under the Taxonomy Regulation (cont.)

Financial year 2024		2024		Substantial contribution criteria						DNSH criteria						Proportion of Taxonomy-aligned or eligible revenue 2023 <sup>1</sup>	Category enabling activity	Category transitional activity	
Economic activities under the Taxonomy Regulation	Codes	Revenue	Proportion of revenue	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity				Minimum safeguards
		millions of euro	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N				Y/N
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	1.3	0.1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	0.0%	E	-
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4 / CCA 7.4	0.0	0.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	-	-	-	Y	0.0%	E	-
Installation, maintenance and repair of renewable energy technologies	CCM 7.6 / CCA 7.6	1.2	0.1%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	-	-	-	Y	0.6%	E	-
<b>Revenue of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		912.1	39.5%														27.8%		
<b>Of which Enabling</b>		709.1	30.7%														23.1%	E	
<b>Of which Transitional</b>		-	-														-		T
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
Electricity generation from fossil gaseous fuels	CCM 4.29 / CCA 4.29	145.1	6.3%	EL	EL	N/EL	N/EL	N/EL	N/EL								3.6%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5 / CCA 6.5	0.1	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Acquisition and ownership of buildings	CCM 7.7 / CCA 7.7	1.0	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
<b>Revenue of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		146.2	6.4%														3.6%		
<b>Revenue of Taxonomy-eligible activities (A.1 + A.2)</b>		1,058.3	45.9%																
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>Revenue of Taxonomy-non-eligible activities</b>		1,248.7	54.1%																
<b>Total (A + B)</b>		2,307.0	100%																

<sup>1</sup> These figures have been restated compared to the Integrated Annual Report 2023. For more information, see section '7.2 Notes on restated figures' of this report.

# VIII. Capital expenditure (Taxonomy CAPEX <sup>APM</sup>) under the Taxonomy Regulation

## Capital expenditure (Taxonomy CAPEX <sup>APM</sup>) under the Taxonomy Regulation

Financial year 2024	2024	Substantial contribution criteria								DNSH criteria						Proportion of Taxonomy-aligned or eligible Taxonomy CAPEX 2023 <sup>2</sup>	Category enabling activity	Category transitional activity	
Economic activities under the Taxonomy Regulation	Codes	Taxonomy CAPEX	Proportion of Taxonomy CAPEX	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity				Minimum safeguards
		EURm	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N				Y/N
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Electricity generation using solar photovoltaic technology	CCM 4.1 / CCA 4.1	116.7	13.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	-	-	Y	Y	Y	3.2%	-	-
Electricity generation from wind power	CCM 4.3 / CCA 4.3	334.8	37.3%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	-	-	Y	Y	Y	42.1%	-	-
Electricity generation from hydropower	CCM 4.5 / CCA 4.5	0.1	0.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	-	-	Y	Y	0.0%	-	-
Transmission and distribution of electricity	CCM 4.9 / CCA 4.9	290.2	32.3%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	Y	Y	32.9%	E	-
Installation of equipment such as, but not limited to future smart metering systems or those replacing smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council	CCM 4.9 (f)	25.0	2.8%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	Y	Y	4.9%	E	-
Storage of electricity	CCM 4.10 / CCA 4.10	28.0	3.1%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	Y	-	Y	Y	Y	0.5%	E	-
Cogeneration of heat/cool and power from bioenergy	CCM 4.20 / CCA 4.20	7.7	0.9%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	-	Y	Y	6.6%	-	-
Production of heat/cool from bioenergy	CCM 4.24 / CCA 4.24	0.2	0.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	-	Y	Y	0.0%	-	-
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5 / CCA 6.5	0.9	0.1%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	-	Y	-	-	-

<sup>1</sup> The primary objective of our activities is to contribute to climate change mitigation, therefore they are not fully assessed for climate change adaptation and disclosed as not aligned.

<sup>2</sup> These figures have been restated compared to the Integrated Annual Report 2023. For more information, see section '7.2 Notes on restated figures' of this report.

**Capital expenditure (Taxonomy CAPEX <sup>(APM)</sup>) under the Taxonomy Regulation (cont.)**

Financial year 2024		2024		Substantial contribution criteria						DNSH criteria						Minimum safeguards	Proportion of Taxonomy-aligned or eligible Taxonomy CAPEX 2023 <sup>1</sup>	Category enabling activity	Category transitional activity
Economic activities under the Taxonomy Regulation	Codes	Taxonomy CAPEX	Proportion of Taxonomy CAPEX	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity				
		EURm	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N				
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	21.6	2.4%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	1.2%	E	-
Installation, maintenance, and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4 / CCA 7.4	0.0	0.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	-	-	-	Y	-	E	-
Installation, maintenance, and repair of renewable energy technologies	CCM 7.6 / CCA 7.6	-	-	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	-	-	-	Y	0.2%	E	-
<b>Taxonomy CAPEX of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		825.2	92.0%														91.6%		
<b>Of which Enabling</b>		364.8	40.7%														39.8%	E	
<b>Of which Transitional</b>		-	-														-		T
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
Electricity generation from fossil gaseous fuels	CCM 4.29 / CCA 4.29	1.8	0.2%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.6%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5 / CCA 6.5	4.2	0.5%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.0%		
Acquisition and ownership of buildings	CCM 7.7 / CCA 7.7	0.1	0.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								-		
<b>Taxonomy CAPEX of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		6.0	0.7%														0.6%		
<b>Taxonomy CAPEX of Taxonomy-eligible activities (A.1 + A.2)</b>		831.3	92.7%														92.2%		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>Taxonomy CAPEX of Taxonomy-non-eligible activities</b>		65.7	7.3%																
<b>Total (A + B)</b>		896.9	100%																

<sup>1</sup> These figures have been restated compared to the Integrated Annual Report 2023. For more information, see section '7.2 Notes on restated figures' of this report.

# IX. Operating expenses (Taxonomy OPEX <sup>APM</sup>) under the Taxonomy Regulation

## Operating expenses (Taxonomy OPEX <sup>APM</sup>) under the Taxonomy Regulation

Financial year 2024	2024	Substantial contribution criteria								DNSH criteria						Proportion of Taxonomy-aligned or eligible Taxonomy OPEX 2023 <sup>2</sup>	Category enabling activity	Category transitional activity	
Economic activities under the Taxonomy Regulation	Codes	Taxonomy OPEX	Proportion of Taxonomy OPEX	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity				Minimum safeguards
		EURm	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N				Y/N
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Electricity generation using solar photovoltaic technology	CCM 4.1 / CCA 4.1	0.0	0.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	-	-	Y	Y	Y	-	-	-
Electricity generation from wind power	CCM 4.3 / CCA 4.3	7.3	9.3%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	-	-	Y	Y	Y	6.1%	-	-
Electricity generation from hydropower	CCM 4.5 / CCA 4.5	0.4	0.5%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	-	-	Y	Y	0.2%	-	-
Transmission and distribution of electricity	CCM 4.9 / CCA 4.9	40.1	51.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	Y	Y	58.9%	E	-
Installation of equipment such as, but not limited to future smart metering systems or those replacing smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council	CCM 4.9 (f)	-	-	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	Y	Y	-	E	-
Storage of electricity	CCM 4.10 / CCA 4.10	0.5	0.6%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	-	Y	Y	-	Y	Y	Y	0.7%	E	-
Cogeneration of heat/cool and power from bioenergy	CCM 4.20 / CCA 4.20	3.6	4.6%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	-	Y	Y	0.6%	-	-
Production of heat/cool from bioenergy	CCM 4.24 / CCA 4.24	0.3	0.3%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	-	Y	Y	0.1%	-	-
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5 / CCA 6.5	-	-	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	Y	Y	-	Y	-	-	-

<sup>1</sup> The primary objective of our activities is to contribute to climate change mitigation, therefore they are not fully assessed for climate change adaptation and disclosed as not aligned.

<sup>2</sup> These figures have been restated compared to the Integrated Annual Report 2023. For more information, see section '7.2 Notes on restated figures' of this report.

**Operating expenses (Taxonomy OPEX <sup>APM</sup>) under the Taxonomy Regulation (cont.)**

Financial year 2024	2024	Substantial contribution criteria								DNSH criteria									
Economic activities under the Taxonomy Regulation	Codes	Taxonomy OPEX	Proportion of Taxonomy OPEX	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity	climate change mitigation	climate change adaptation	water	pollution	circularity	biodiversity	Minimum safeguards	Proportion of Taxonomy-aligned or eligible Taxonomy OPEX 2023 <sup>1</sup>	Category enabling activity	Category transitional activity
		EURm	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	0.2	0.3%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	0.0%	E	-
Installation, maintenance, and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4 / CCA 7.4	0.0	0.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	-	-	-	Y	-	E	-
Installation, maintenance, and repair of renewable energy technologies	CCM 7.6 / CCA 7.6	0.0	0.0%	Y	N <sup>1</sup>	N/EL	N/EL	N/EL	N/EL	Y	Y	-	-	-	-	Y	0.0%	E	-
<b>Taxonomy OPEX of environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		52.4	66.7%														66.7%		
<b>Of which Enabling</b>		40.9	52.0%														59.6%	E	
<b>Of which Transitional</b>		-	-														-		T
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>																			
Electricity generation from fossil gaseous fuels	CCM 4.29 / CCA 4.29	6.3	8.0%	EL	EL	N/EL	N/EL	N/EL	N/EL								7.8%		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5 / CCA 6.5	-	-	EL	EL	N/EL	N/EL	N/EL	N/EL								-		
Acquisition and ownership of buildings	CCM 7.7 / CCA 7.7	0.0	0.1%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.1%		
<b>Taxonomy OPEX of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)</b>		6.3	8.0%														7.9%		
<b>Taxonomy OPEX of Taxonomy-eligible activities (A.1 + A.2)</b>		58.7	74.7%														74.6%		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>Taxonomy OPEX of Taxonomy-non-eligible activities</b>		19.9	25.3%																
<b>Total (A + B)</b>		78.6	100%																

<sup>1</sup> These figures have been restated compared to the Integrated Annual Report 2023. For more information, see section '7.2 Notes on restated figures' of this report.

# X. Taxonomy tables for nuclear and gas as referred in Complimentary Climate Delegated Act

## Template 1. Nuclear and fossil gas related activities

Nuclear energy related activities		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

**Template 4. Taxonomy-eligible but not taxonomy-aligned economic activities****Revenue – Taxonomy-eligible but not taxonomy-aligned economic activities**

Economic activities	Amount and proportion					
	CCM+CCA		Climate change mitigation		Climate change adaptation	
	Amount	%	Amount	%	Amount	%
1. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	145.1	99.2%	145.1	99.2%	-	-
5. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7. <b>Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	1.1	0.8%	1.1	0.8%	-	-
8. <b>Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	146.2	100.0%	146.2	100.0%	-	-



**Taxonomy OPEX <sup>APM</sup> – Taxonomy-eligible but not taxonomy-aligned economic activities**

Economic activities	Amount and proportion					
	CCM+CCA		Climate change mitigation		Climate change adaptation	
	Amount	%	Amount	%	Amount	%
1. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	6.3	99.3%	6.3	99.3%	-	-
5. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7. <b>Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	0.0	0.7%	0.0	0.7%	-	-
8. <b>Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	6.3	100.0%	6.3	100.0%	-	-

**Taxonomy CAPEX <sup>APM</sup> – Taxonomy-eligible but not taxonomy-aligned economic activities**

Economic activities	Amount and proportion					
	CCM+CCA		Climate change mitigation		Climate change adaptation	
	Amount	%	Amount	%	Amount	%
1. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1.8	29.0%	1.8	29.0%	-	-
5. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6. Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7. <b>Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	4.3	71.0%	4.3	71.0%	-	-
8. <b>Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	6.0	100.0%	6.0	100.0%	-	-

Template 2. Eligible activities that are aligned (denominator), Template 3. Eligible activities that are aligned (numerator) and Template 5. Taxonomy-non-eligible economic activities as referred in Article 8 (6) and (7) of Complimentary Climate Delegated Act are not relevant for the Group, as it does not have any nuclear energy related activities (4.26-4.28) and fossil gas related activities (4.29-4.31) are already disclosed as Taxonomy-eligible but not aligned in template 4.

