



Code of Ethics of Ignitis Group

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Statement by the executive



We have defined in Ignitis Group Strategy 2030 **WHAT** we do in the long term: we aim to become a globally competitive energy company creating value for Lithuania. In this Code of Ethics, we agree on another important issue: **HOW** we do that.

We are ambitious. We strive for leadership in the global energy market through our actions, responsibility and transparency. I am convinced that this is the only way to stand out and to maintain the trust of all stakeholders in us, which is necessary for successful operation.

A number of priorities sit behind the firm foundation of the organisation's values: equal opportunities for employees, creating a culture of improvement, open and fair market participation, responsibility and transparency, partnership and cooperation with local communities and organisations, and with society as a whole.

This Code sets out the principles that provide a clear understanding of what our shareholders, partners and the society can expect from the employees of Ignitis Group companies, and what its employees can expect from the organisation.

Dear colleagues, let us be guided by this Code and share it with others. Let it become a vital part of our organization's culture and daily activities.

A handwritten signature in black ink, appearing to read 'Darius Maikštėnas'.

Darius Maikštėnas
Chairman of the Board and CEO
Ignitis Group

Application of the Code



- ✓ This Code of Ethics (hereinafter – the Code) defines the principles and standards of business ethics and conduct followed by Ignitis Group companies and expected from our employees in their daily work.
- ✓ The Code covers all companies within Ignitis Group which hereinafter are collectively referred to as the Group. We apply the Code to all employees and members of the supervisory and management bodies of the Group companies, irrespective of their position, the company or country in which they work, and to the partners of the Group.
- ✓ This Code helps employees to manage their conduct in accordance with the expectations of the Group. The Code delivers our values of ethical and responsible conducts which are carried out in our business practices by the Group companies and reflects what can be expected from us by all our stakeholders.

Values

In our vision, Ignitis Group aims to become a globally competitive energy company creating value for Lithuania.

We are united by the mission to make the world more energy smart.

Every day we aim to furnish increasingly effective, efficient and user-friendly energy solutions. Responsibility, partnership, openness and development are the things that unite, inspire and motivate us. The principles of our ethical conduct, that are described below, are based on these values.



RESPONSIBILITY

Care. Do. For Earth.
Start with myself.



OPENNESS

See. Understand. Share.
Open to the world.



PARTNERSHIP

Different. Strong.
Together.

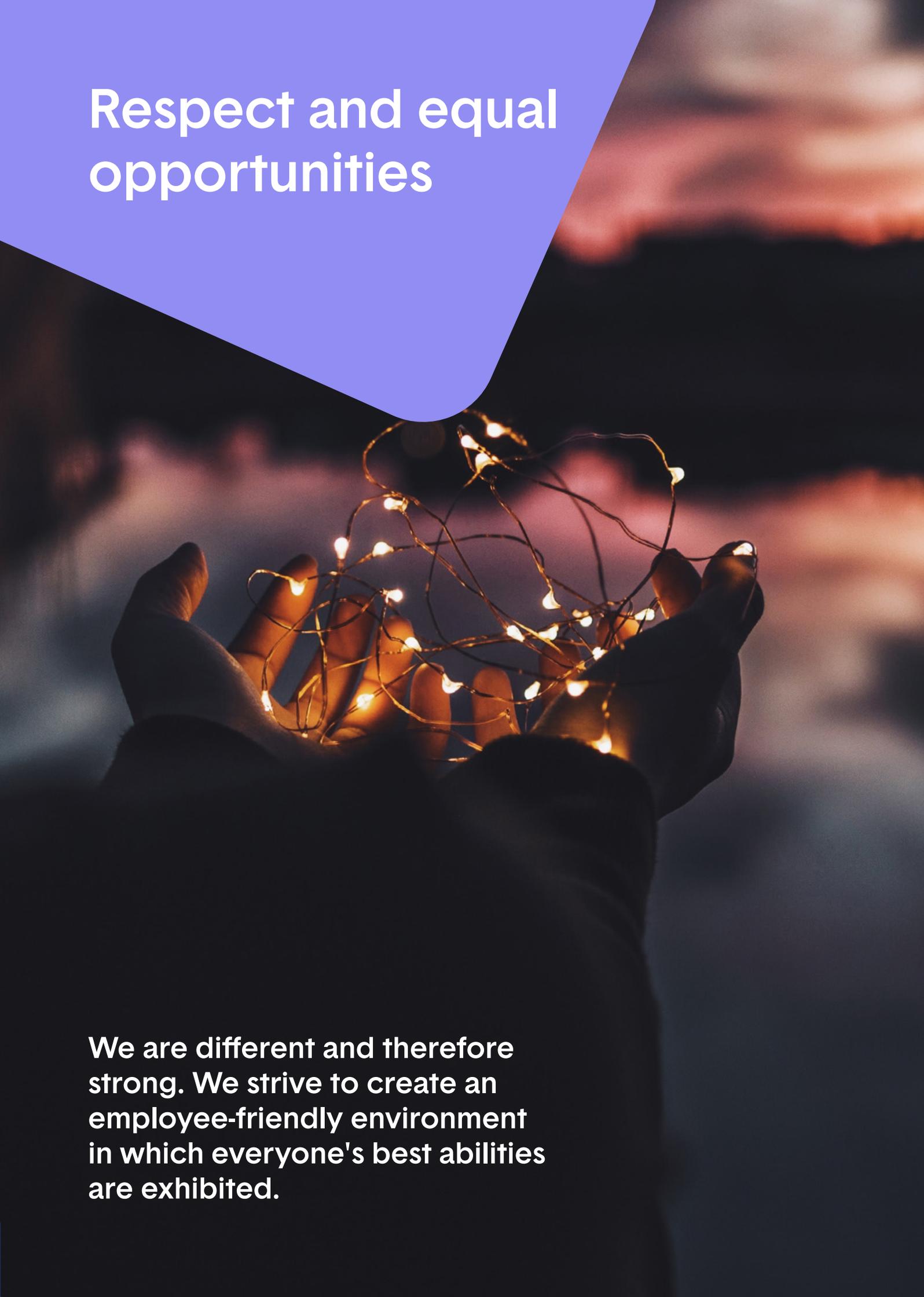


IMPROVEMENT

Curious. Bold.
Everyday.



Respect and equal opportunities

A pair of hands is shown from the bottom, cupping a tangled string of warm white lights. The lights are glowing and creating a soft, warm atmosphere. The background is dark with blurred bokeh lights in shades of orange and red, suggesting an indoor setting with festive or warm lighting. A large, light blue shape is in the top left corner, containing the text.

We are different and therefore strong. We strive to create an employee-friendly environment in which everyone's best abilities are exhibited.

We ensure respect for human rights

We respect and protect human rights and freedoms, we disseminate and foster democratic values in accordance with the guidelines set forth in the Universal Declaration of Human Rights.

By our words, actions and proposed solutions we demonstrate goodwill and mutual trust, and create an employee-friendly and work-conducive atmosphere.

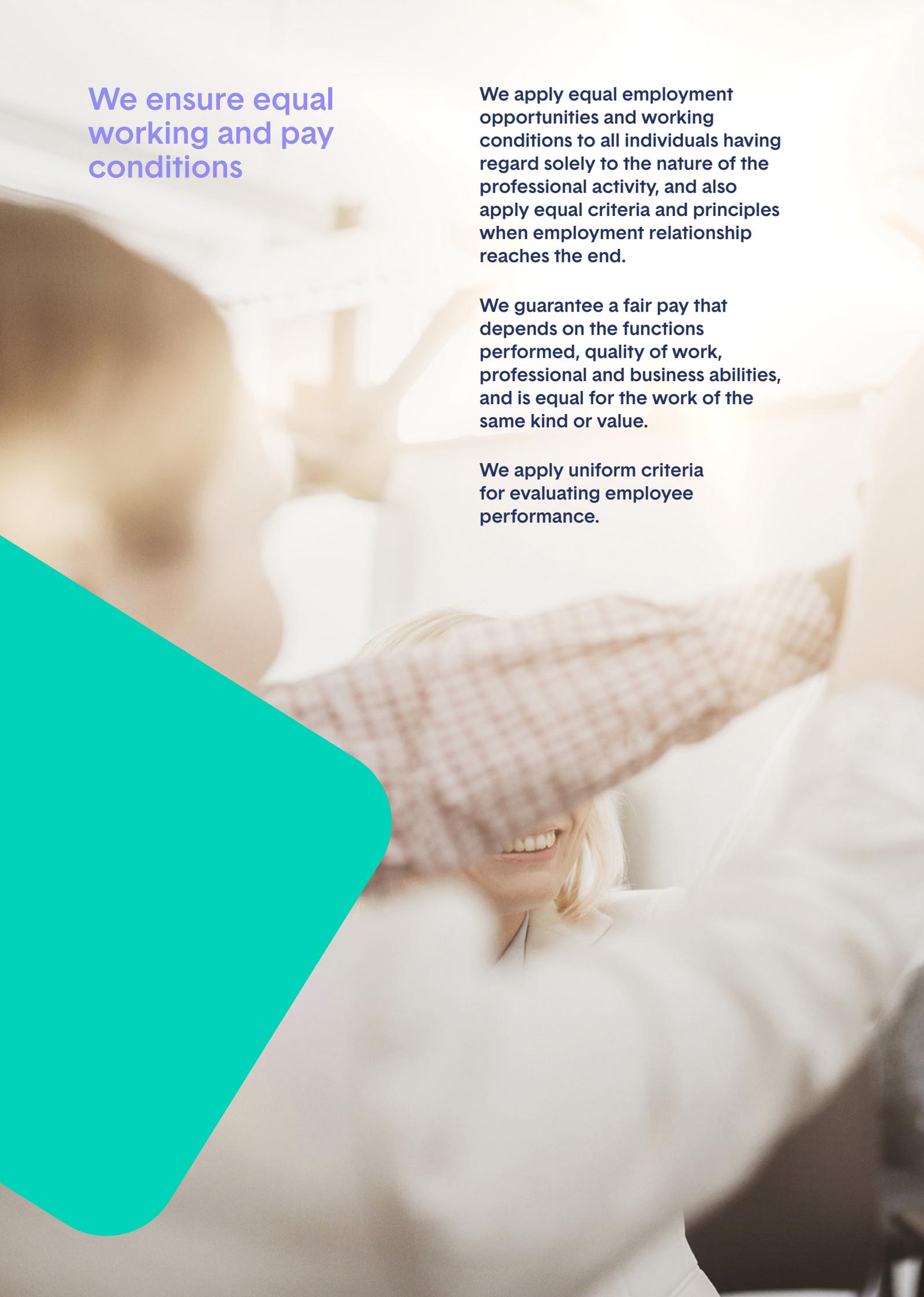
We are fair and objective, we rely on facts and data, and ask others to behave the same way.

We do not tolerate discrimination, harassment, bullying

We encourage diversity among employees, and do not tolerate any form of discrimination, including, but not limited to, discrimination based on age, gender, race, nationality, language, origin, social status, opinion, thought or belief, sexual orientation, disability, ethnicity, religion, and / or other characteristics protected by law.

We do not tolerate harassment, violence, humiliation or bullying in any form.

We protect the employees who report or testify of any issues or incidents and their representatives from hostile behaviour and adverse consequences including retaliation.



We ensure equal working and pay conditions

We apply equal employment opportunities and working conditions to all individuals having regard solely to the nature of the professional activity, and also apply equal criteria and principles when employment relationship reaches the end.

We guarantee a fair pay that depends on the functions performed, quality of work, professional and business abilities, and is equal for the work of the same kind or value.

We apply uniform criteria for evaluating employee performance.



Culture of safe work and improvement



In creating the
energy of the
future we think
and act globally.
We are proud
of our activities
and strive to
work safely and
efficiently.

We take care to ensure that work is safe

We take preventative measures to ensure a safe working environment, so that the health and life of our colleagues, contractors and other stakeholders are not endangered.

We use modern, reliable and safe measures that are necessary to perform the job functions in a reliable quality.

We strictly prohibit any employee to be engaged in any work activity when he or she is under the influence of any psychotropic substance, including but not limited to alcohol and illegal drugs.

Having noticed inappropriate or unsafe behaviour in the workplace, we immediately report this to our line manager or responsible person.

We are constantly improving and learning from each other

We see opportunities and problems, propose solutions and implement them. We look for the causes of problems and ask what is important to the customer.

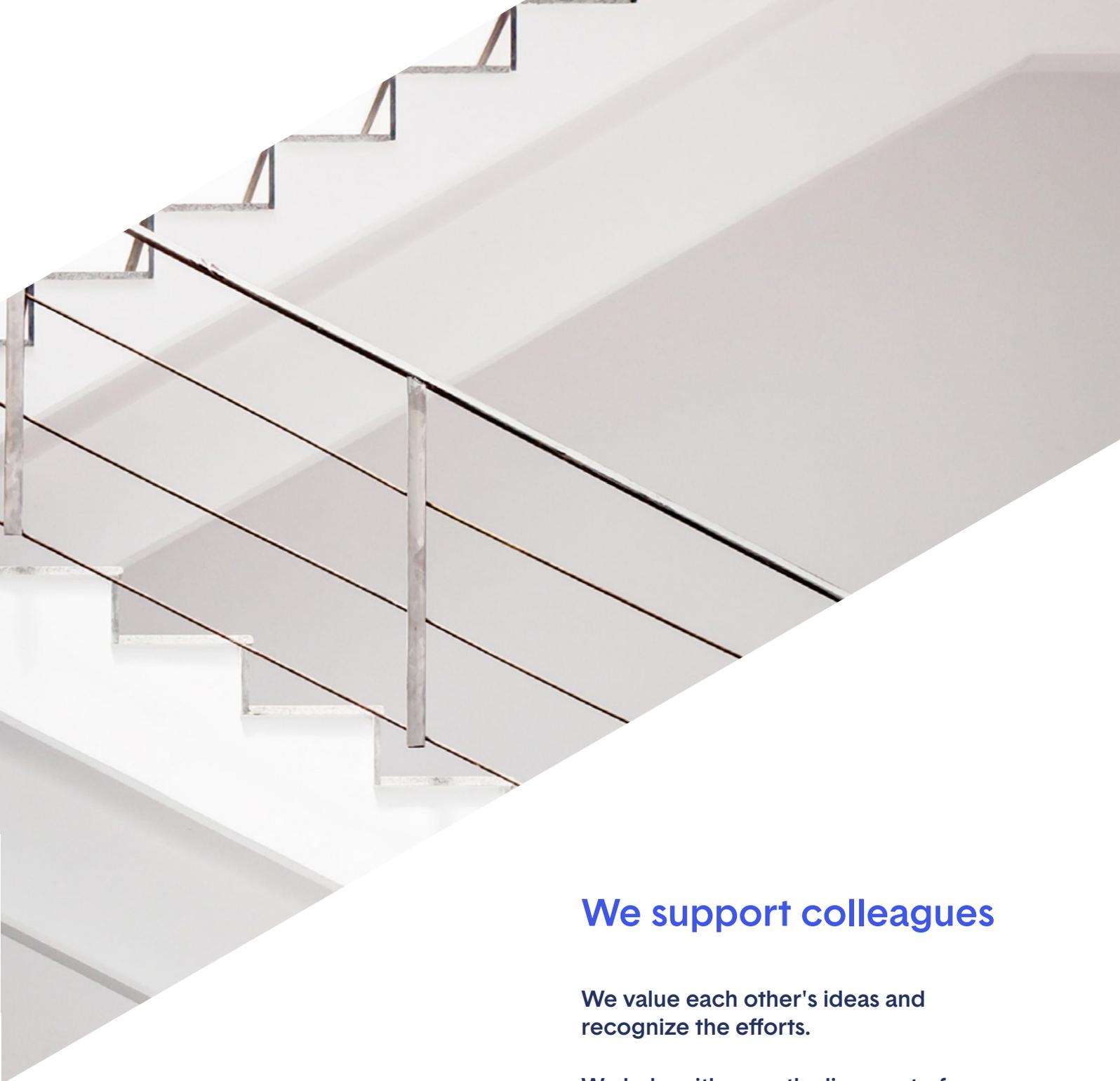
We improve the best skills of the employees and help them to upgrade the qualification.

We perform our duties in a responsible manner, and are ready to cooperate and help others.

We share experiences and competencies, we provide advice, and, when necessary, we ask and seek help.

We do not blame anyone if a mistake occurs. We analyse the situation and process to find the cause of the mistake, and make efforts to prevent it from happening again. We do not hide mistakes, but talk about them so others can learn from them.





We support colleagues

We value each other's ideas and recognize the efforts.

We help with smooth alignment of work activities and personal life.

We support representatives of the employees and voluntary membership in trade unions.

We express feelings of compassion and help colleagues when they are going through a difficult time in their personal lives.

Open and fair activities in the market

We maintain open and fair competition, and relationships with customers, suppliers and other partners based on mutual value creation.

We compete fairly

We seek competitive advantage in the market by increasing our operational excellence and by improving performance, by investing in innovation, development and quality, and by creating attractive services.

We do not act in the way and do not tolerate actions that jeopardize fair competition or harm the customers (agreements with competitors, unlawful restrictions on the activities of customers or suppliers, unlawful disclosure or exchange of confidential and commercially significant information, manipulation of trading orders, transactions or information, abuse of a dominant or exclusive position).

We conduct purchases and sales in a responsible way

We conduct all purchases and sales in accordance with established procedures in a transparent and efficient manner.

We ensure an accountable use of funds to purchase goods or services.

We closely overlook the performance of contracts in accordance with all requirements.



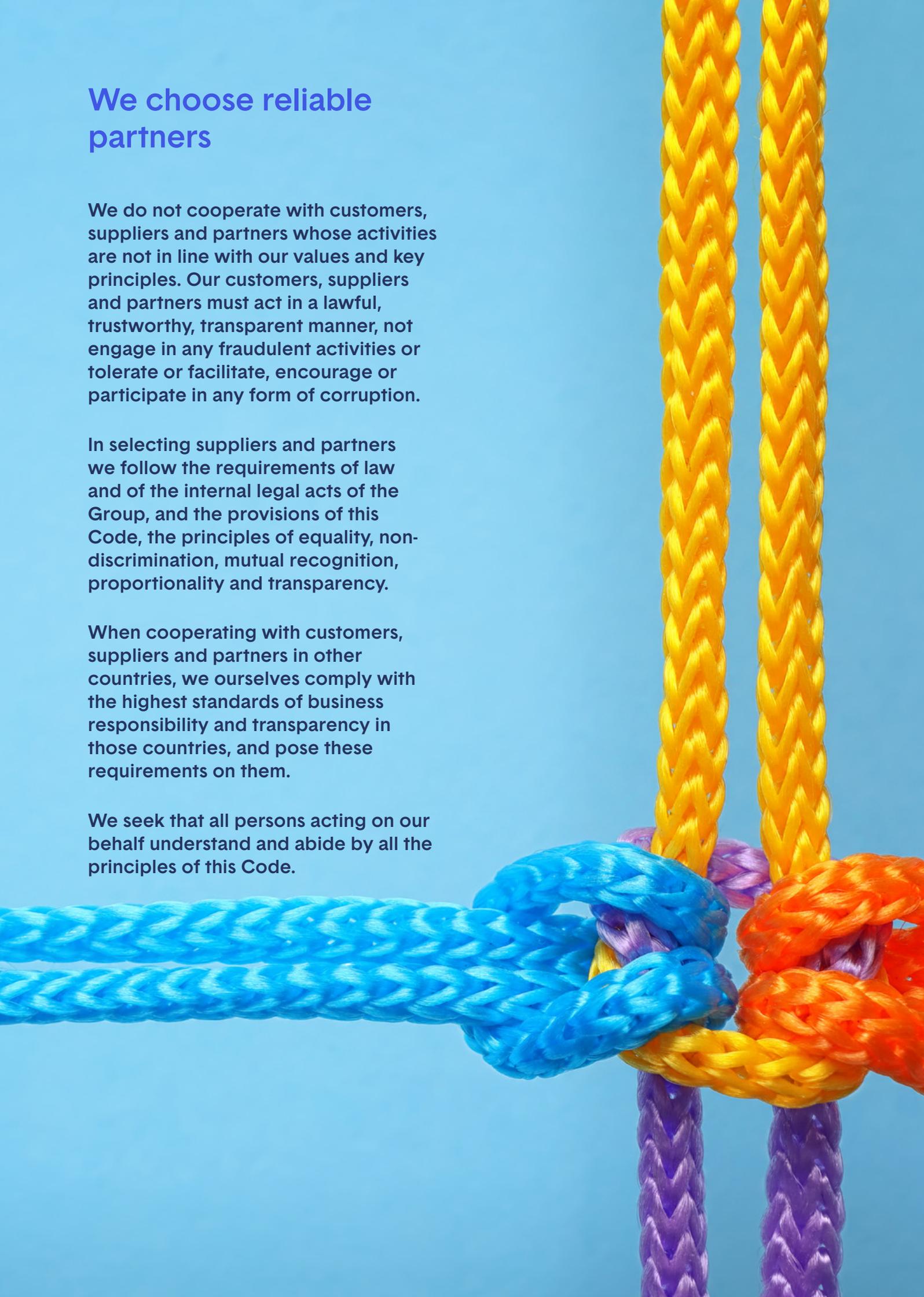
We choose reliable partners

We do not cooperate with customers, suppliers and partners whose activities are not in line with our values and key principles. Our customers, suppliers and partners must act in a lawful, trustworthy, transparent manner, not engage in any fraudulent activities or tolerate or facilitate, encourage or participate in any form of corruption.

In selecting suppliers and partners we follow the requirements of law and of the internal legal acts of the Group, and the provisions of this Code, the principles of equality, non-discrimination, mutual recognition, proportionality and transparency.

When cooperating with customers, suppliers and partners in other countries, we ourselves comply with the highest standards of business responsibility and transparency in those countries, and pose these requirements on them.

We seek that all persons acting on our behalf understand and abide by all the principles of this Code.



We protect insider information

We do not disclose confidential information received in relation to any business activities or insider information (even if obtained inadvertently) to unauthorized persons, especially if the disclosure of such information could affect the price of the Group companies' shares.

We do not engage in any dealings of shares or other securities with insider information.

We do not disseminate unverified information or mislead others with inaccurate information.

We are accountable for our activities

We report publicly to our shareholders and to the society, by providing operational and financial results in a timely, clear and comprehensive manner.

We prepare financial statements and activity reports in accordance with international standards and the highest transparency requirements.

Through transparency and public reporting we ensure that we earn revenue ethically and lawfully through our processes and procedures we work to prevent money laundering¹ and terrorist financing.

¹ Money laundering is a criminal activity by which the proceeds of crime are disguised as legitimate assets or funds.

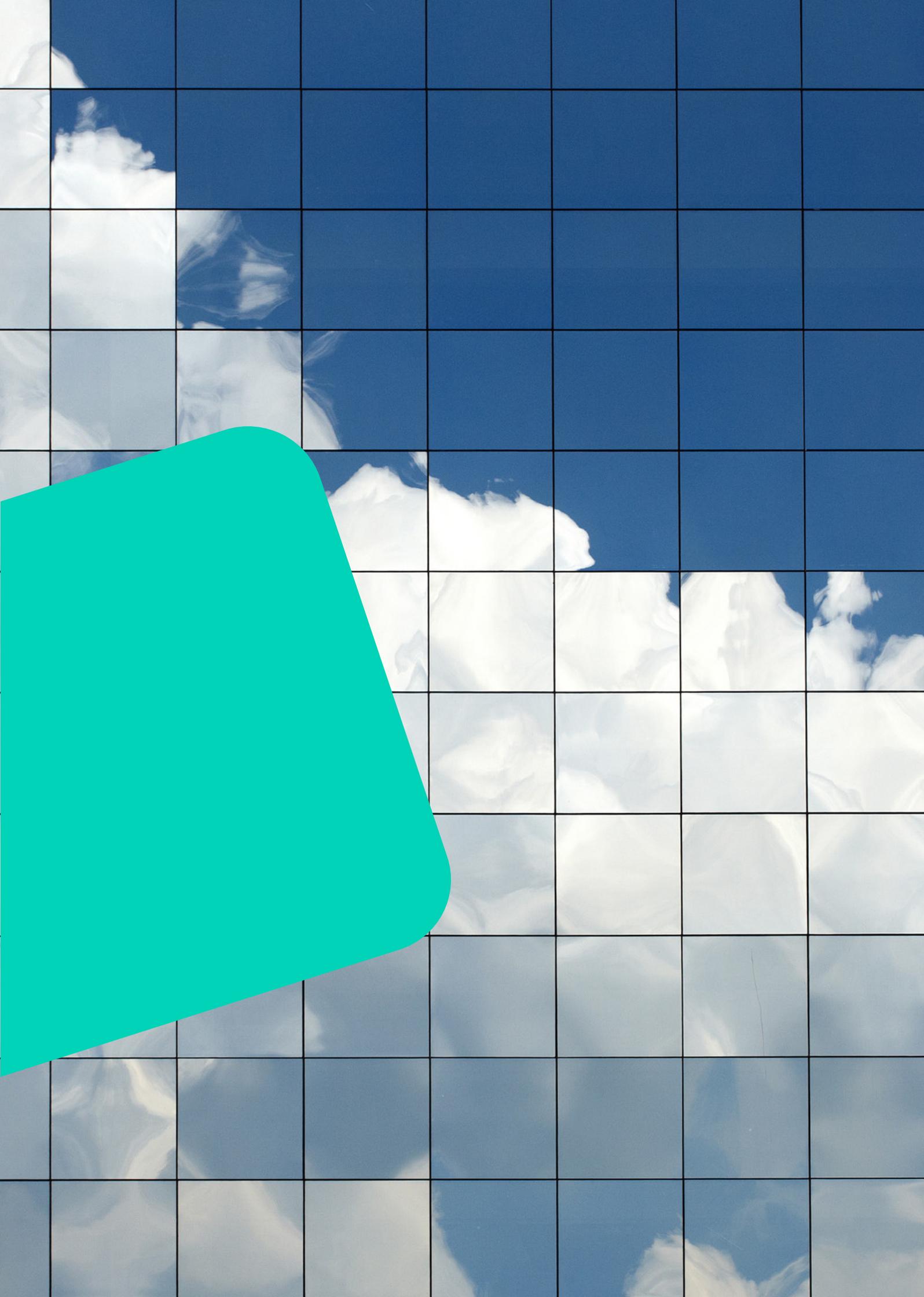
We professionally represent the interests of the Group

We do not tolerate any use of the name of the Group companies or of other circumstances arising from representation in pursuing goals that are not in the best interests of the Group companies, or the personal goals of the representative.

Where any personnel identify, or have a suspicion of, an incident or other event in any company of the Group, that is of significance to employees or others, or that is in violation of this Code or any relevant laws, we immediately report this to the executives and to the employees of compliance and communication functions, and, within the time frames prescribed by law, to the relevant authorities (if applicable).

Comments related to the activities of the Group companies are made publicly available by the heads of the companies or other employees who have such authority; we convey to them questions received from journalists or other stakeholders.

When sharing job-related information on the personal accounts of social networking websites, we care about the reputation of the Group companies. We do not share confidential work information, photos and videos that capture images from places where making photos and filming are prohibited.



Responsibility and transparency

We are one of the largest groups of energy companies in the Baltic States, and we contribute to enshrining global benchmark of transparency and responsible activities.



We ensure the interests of the shareholders

When performing their functions and managing the risks faced by the Group, the management and supervisory bodies seek to properly safeguard the property and non-property rights of shareholders, including the interests of minority shareholders.

We have zero tolerance for corruption

We follow the provisions of the Anti-corruption Policy and we do not tolerate bribery, improper payments, influence peddling, money laundering, abuse of position and / or other forms of corruption.

We do not ourselves or through intermediaries, directly or indirectly, offer, promise, give, require or encourage the giving or receiving of a bribe.

We do not pay or tolerate any form of facilitation payment².

We strive that our partners follow the principles of zero tolerance for corruption, we pass on our experience in the fight against corruption to other companies: we share experience, initiate discussions and trainings.

We always uphold the duty to report any information in relation to an identified crime to the relevant law enforcement authorities.

²Facilitation payment – low value informal payments that are made for carrying out a routine task that the company should / could receive in accordance with the law.

We avoid conflicts of interest

We openly and honestly disclose our private interests by completing and updating timely declarations of interest, we inform in advance of situations that may give rise to a conflict of interest.

We do not participate in making and enforcement of any decision that causes or may cause a conflict of interest.

We do not engage in activities that would be contrary to the interests of the Group companies or would cast doubt on objectivity, we do not request or transmit information which is not necessary for the performance of duties.

If we suspect that decisions made are possibly affected by a conflict of interest, we pass information about this to responsible persons or competent authorities.

We do not give or accept valuable gifts

We follow the Anti-corruption Policy and know that we can accept and donate only representative and / or low value symbolic gifts, and hospitality that is consistent with normal business or international practice. We register all gifts received.

During procurement processes, we do not accept from suppliers and do not provide them ourselves with gifts, services, entertainment, hospitality and other benefits.

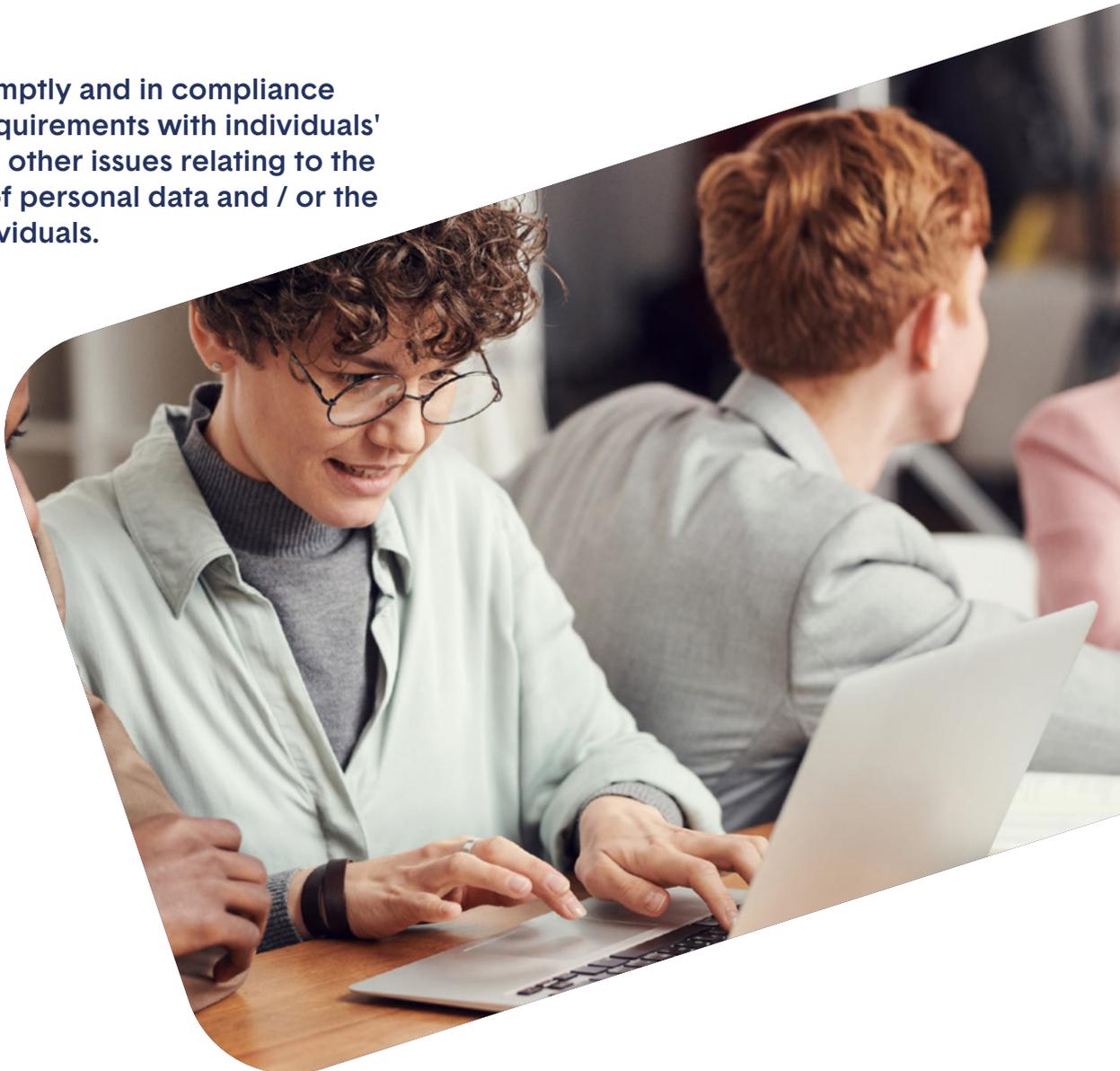
We do not provide gifts or other similar benefits to the clerks, employees, officers of state and municipal institutions, politicians or other public figures, and / or persons who have administrative or public authority.

We guarantee the privacy of the individual and protection of his/her data

We process personal data of the customers, employees, partners and other entities only when there is a legal basis and purpose for doing that.

We process data by ensuring its privacy, safety and confidentiality, and appropriate technical and organizational measures to protect the data against unauthorized access, disclosure, accidental loss, alteration, destruction or other unlawful processing.

We deal promptly and in compliance with legal requirements with individuals' requests and other issues relating to the processing of personal data and / or the rights of individuals.



We ensure confidentiality of information

We protect against any unlawful disclosure of information marked with any indication of confidentiality about company operations, employees, customers and business partners that is collected in the Group companies and that has come to light in the exercise of job functions.

In collecting, storing and sharing information we follow the “need-to-know” principle³.

We protect confidential information entrusted to us by customers, suppliers, partners and any other party as our own.

We use resources responsibly⁴

We protect the resources of the Group companies and use them for their intended purpose, by saving them and sharing with each other.

We notify responsible persons of misuse of the resources of the Group companies, damaged or lost asset.

If we have ideas on how to use the Organization's resources more efficiently, we propose them to our immediate manager.

³ “Need-to-know” principle – in accordance with the procedures laid down in the internal legislation, confidential information shall be disclosed only to individuals who need to know it for the purpose of performing direct activities, or where it is necessary for the operation of the company, or required by applicable law.

⁴ Resources of the organization – tangible assets (infrastructure, equipment, vehicles, raw materials and funds) and intangible assets (confidential information, time, information systems, intellectual property) using which the employees perform their work and achieve the goals of the organization. Their inappropriate use or wastage cause damage to the organization.



More information:

Anti-corruption Policy

Dividend Policy

We care about protecting the environment

We use advanced, energy and resource efficient tools and technologies that help reduce environmental impact of the activities, we implement processes that meet environmental standards.

We invest in and develop green energy production, take care to increase the efficiency of the distribution network and to develop smart solutions.

We ensure the proper management of waste generated in operations and reduce greenhouse gas emissions.

We give priority to less polluting transport, enable our employees to ride bikes and scooters to work and meetings, to choose public transport.

We encourage the residents and business to use energy sources efficiently and to protect the environment.

We actively participate in eco-initiatives and preventive programmes that ensure environmental protection.



Enabling and protecting partnership

In creating value for society, we combine innovation and many years of experience, we open up to the world and maintain energy independence.



We strive to remain apolitical

The Group is not involved in political activities, does not support or expect any support from political parties, organizations or individuals otherwise involved in politics.

We do not limit the personal initiative of the employees of participating in political activities. However, such personal actions of the employees must be clearly separated and not related to the activities, position and responsibilities of the Group companies.

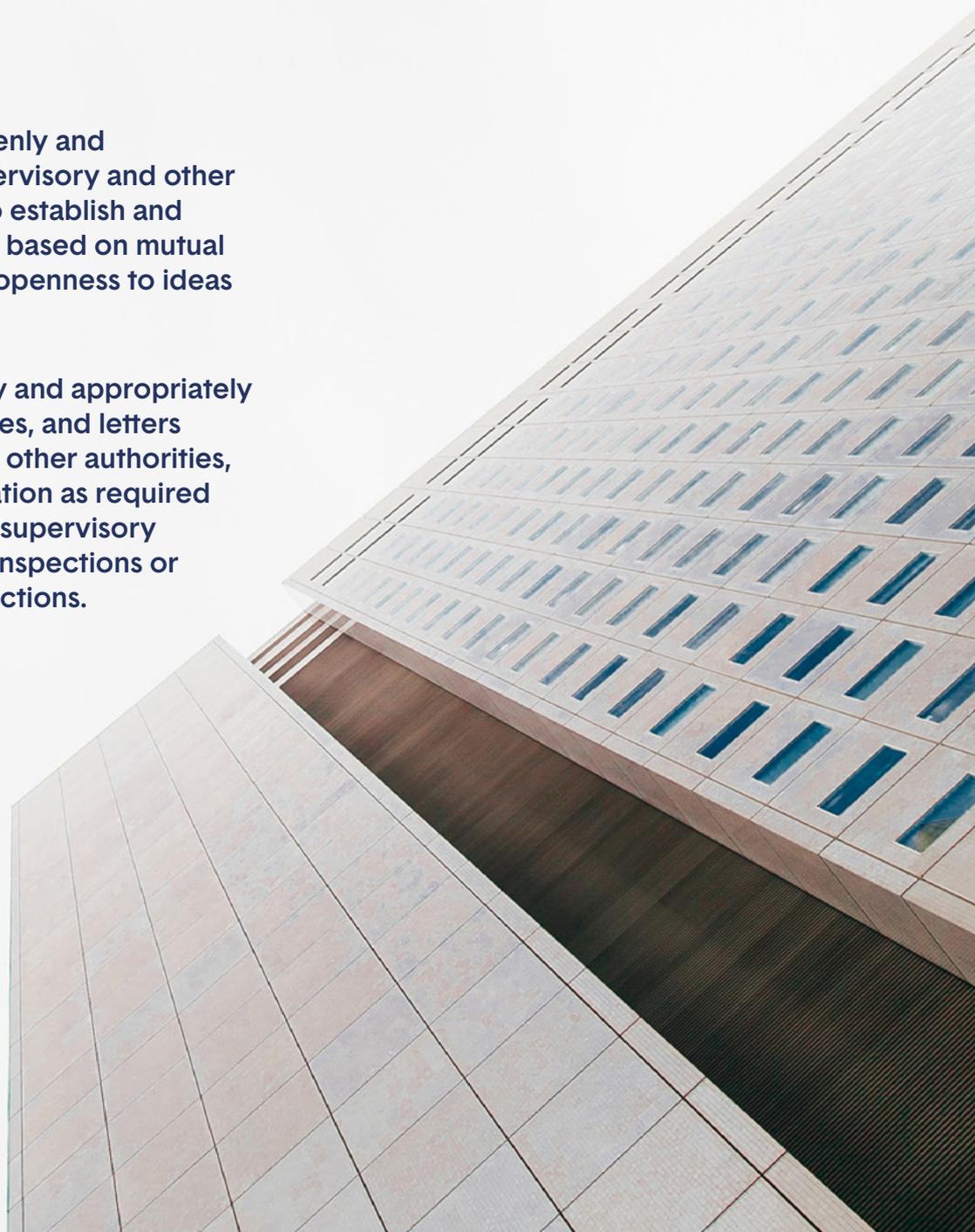
We do not illegally influence legislators. We provide our comments, proposals and position on draft legislation that could affect the operations, employees, customers and shareholders of the Group companies in a transparent manner.



We cooperate with supervisory and other institutions

We communicate openly and respectfully with supervisory and other authorities in order to establish and maintain cooperation based on mutual understanding, trust, openness to ideas and opinions.

We respond promptly and appropriately to all requests, inquiries, and letters from supervisory and other authorities, we exchange information as required and cooperate when supervisory authorities carry out inspections or other supervisory functions.



We maintain relationship with communities and non-governmental organizations

We strive for open dialogue and maintain close contacts with the communities in the environment of which we operate and develop projects. We account for our activities in a consistent and transparent manner, and, in cooperation with various organizations, we actively contribute to the social development of the society and wealth creation.

We encourage employees to engage in volunteering.



**More
information:**

Social
Responsibility

Monitoring compliance with the Code

All employees of the Group companies are responsible for the proper compliance with the provisions of the Code.

Ensuring and monitoring of proper compliance with the provisions of the Code is the responsibility of the managers of various levels that work in the Group and of the staff of compliance and audit functions, as well as of the Committee for Risk Assessment and Operational Ethics in accordance with the scheme presented below:

Line **3**

The Committee for Risk Assessment and Operational Ethics under the Supervisory Board of Ignitis Group.

Function: Evaluation of results of Code compliance and making recommendations.

Line **2**

Staff of compliance and audit functions working in the Group companies.

Function: Monitoring compliance with the Code, knowledge testing, generalization of results.

Line **1**

Managers of various levels of the Group companies.

Function: Introducing provisions of the Code to the employees, collecting feedback.

Notification of breaches of the Code

You have doubts as to whether your decision is in breach of the provisions of the Code?

Consult your line manager or representative of the related functional area!

Do you suspect that the provisions of this Code are in breach?

Notify via the Trust Line.



E-mail pasitikejimolinija@ignitis.lt



Phone **+370 640 88889**

Trust Line guarantees anonymity of whistleblowers and meets the requirements of the Law on Whistleblower Protection.

This Code was approved and can be amended by the Board of the parent company UAB Ignitis Grupė of Ignitis Group. By its decision the Code is made publicly available.

The Code is approved on 23th March of 2020.

