UAB "EPSO-G" GROUP OF COMPANIES BUSINESS PARTNERS IDENTIFICATION QUESTIONNAIRE

In order to encourage the business partners of the companies belonging to the "EPSO-G" group of companies[1] to comply with the principles of conduct set out in the "EPSO-G" group of companies' code of ethics (hereinafter - the Code) and to cooperate with business partners who comply with the provisions of the Code, as well as implementing the provisions of Section VI of the Description of Cyber Security Requirements, approved by the Resolution of the Government of the Republic of Lithuania On the Implementation of the Law on Cyber Security of the Republic of Lithuania, we kindly ask you to complete the questionnaire. The questionnaire is mandatory and will be used as a basis for deciding on further cooperation with the business partner.

1. GENERAL DATA

Name (or first and last name of a natural person, previous first and/or last name, if changed)		Country of registration (or nationality(-ies) of a natural person)	
Company code (or personal identification number of a natural person)		Registration address (of a legal entity)	
Legal form (of a legal entity)		Name, surname, nationality of the head (the head of a legal entity)	
Date of registration (of a legal entity)		Country of permanent residence of the head (the head of a legal entity)	

2. REGIONS WHERE ACTIVITIES ARE CARRIED OUT

Mark the appropriate option with a check mark.

The Republic of Lithuania	☐	The Russian Federation	☐
The European Economic Area, the European Union, NATO	☐	The United States of America	☐
The People's Republic of China	☐	Other (specify)	
The Republic of Belarus	☐		

3. INFORMATION ON POLITICALLY EXPOSED PERSONS (PEP))[2]

Has the head/representative of the business partner or their close family members[3] or close associates[4] held any significant public positions[5] at present or in the last 12 months?

☐ Yes ☐ No

(if you marked "Yes", provide the following information about the PEP below)

No.	Who is entrusted with important public duties?	Name	Surname	PEP position	Institution where he/she holds the position	Country where the person is a PEP
1.	Select from the list					

2.	Select from the list					
3.	Select from the list					

4. BENEFICIARIES[6]

Identify the natural persons who directly or indirectly own or control more than 25% of the shares (shares, parts etc.) or voting rights of the Business partner, including through nominee shares or otherwise control the Business partner.

No.	Name	Surname	Operation (directly/indirectly***)	Shares (shares, parts, etc.), voting rights, % or other method of control by the Business partner
1.			Select from the list	
2.			Select from the list	
3.			Select from the list	

*** Indirectly – through another legal entity that is a shareholder, partner, or participant in the legal entity

5. SHAREHOLDERS, PARTNERS, PARTICIPANTS

Provide information on all legal entities and individuals holding shares (shares, parts, etc.) of the business partner, voting rights

No.	Company name / first name, last name	Company code (if a legal entity)	Country of registration / nationality	Shares (shares, parts, etc.), voting rights, %
1.				
2.				
3.				

6. ANTI-CORRUPTION ACTIVITIES, INTERNATIONAL SANCTIONS, PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

Has an external audit/investigation into corruption-related violations been initiated or is currently being conducted in relation to the business partner or its subsidiary, parent company, representative office, branch, or similar entity, has an external audit/investigation been initiated or is currently being conducted in relation to a corruption-related violation or a violation of legislation regulating competition or money laundering prevention?

☐ Yes ☐ No

(if you have marked "Yes", provide information about such investigations/inspections below)

No.	Institution conducting/having conducted the investigation/inspection	Nature of the investigation/inspection	Date of completion/planned completion of the investigation/inspection	Results of the investigation/inspection and measures taken (if known)
1.				

2.				

Does the business partner implement anti-corruption measures to manage corruption risks and ensure the prevention of money laundering and terrorist financing?
☐ Yes ☐ No

(if you have marked "Yes", provide the requested information below)

Title of the document defining the measures applied / description of the measures	Reference to the publicly available document (if it is publicly available)

Are international sanctions[7] imposed on the business partner, its shareholders, partners, participants, beneficiaries, managers, or members of collegial bodies[7]?
☐ Yes ☐ No

(if you have marked "Yes", provide the requested information below)

Name, surname	Citizenship	Indicate which international sanctions apply

Do the business partner, its subsidiaries, parent companies, representative offices, branches, and other entities associated with the business partner operate in countries or parts of countries, territories (special status zones) subject to international sanctions?
☐ Yes ☐ No

(if you have marked "Yes", provide the requested information below)

No.	Company name	Company code	Country of registration of the company	Relationship with the business partner	Description of activities	Country or part thereof, territory (special status zone)
1.						
2.						

Do the beneficiaries, managers, and members of collegial bodies of the business partner live or reside in countries or parts of countries, territories (special status zones) subject to international sanctions?
☐ Yes ☐ No

(if you have marked "Yes", provide the requested information below)

No.	Name, surname	Citizenship	Country or part thereof, territory (special status zone)
1.			
2.			

Does the business partner have customers or business partners in countries or parts of countries, territories (special status zones) that are subject to international sanctions or are considered target territories[8]?
☐ Yes ☐ No

(if you have marked "Yes", provide the requested information below)

No.	Company name / first name, last name	Company code (if a legal entity)	Country of registration / nationality	Relationship with the business partner	Activities carried out	Country or part thereof, territory (special status zone), target territory
1.						
2.						

7. QUALITY, ENVIRONMENTAL PROTECTION, SOCIAL RESPONSIBILITY AND GOVERNANCE

Does the business partner have a quality management system based on ISO9001 or an equivalent standard?

☐ Yes ☐ No

(if you have marked "Yes", provide the requested information below)

Certificate name	Certificate No.	Date of issue

Does the business partner have and implement policies related to business sustainability, social responsibility, sustainability, etc. in areas related to ESG (environmental, social, and governance)?

☐ Yes ☐ No

(if you have marked "Yes", provide the requested information below)

Document name	Reference to the document (if publicly available)

Does the business partner or the group to which the operating partner belongs provide a sustainability report?

☐ Yes ☐ No

(if you have marked "Yes", provide the requested information below)

Document title	Reference to the document (if publicly available)

Has the business partner defined the principles of environmental compliance in its activities in its internal legislation (policies, rules, procedures, etc.)?

☐ Yes ☐ No

(if you selected "Yes", provide the information requested below)

Document title	Link to the document (if publicly available)

Does the business partner have greenhouse gas (GHG) emission reduction targets or plans in place?

☐ Yes ☐ No

(if you answered "Yes", specify your goals and/or plans below)

Does the business partner have a certified environmental management system based on ISO14001, EMAS, or another equivalent standard?

☐ Yes ☐ No

(if you selected "Yes", provide the information requested below)

Certificate name	Certificate No.	Date of issue

8. CERTIFICATES, LABELING

Check the box if the materials, products, or services you supply to us are certified with one of the following certificates/labels

ISO 14024 standards	☐	Fairtrade	☐
FSC labelling	☐	EcoVadis	☐
EU ecological labelling	☐	Other (specify)	

9. LABOR STANDARDS, HUMAN RIGHTS

Has the business partner defined the relationship between the employer and the employee in internal legal acts (policies, rules, procedures, etc.)?

☐ Yes ☐ No

(if you marked "Yes", indicate the name of the document below)

Does the business partner have a social accountability system in place based on SA8000 or another equivalent standard?

☐ Yes ☐ No

(if you selected "Yes", provide the information requested below)

Certificate name	Certificate No.	Date of issue

Does the business partner define the nature and working hours of employees under the age of 18 in its internal regulations (policies, rules, procedures, etc.)?

☐ Yes ☐ No

(if you marked "Yes", indicate the name of the document below)

Do you have a certified occupational health and safety management system based on ISO45001 or another equivalent standard?

☐ Yes ☐ No

(if you selected "Yes", provide the information requested below)

Certificate name	Certificate No.	Date of issue

10. INFORMATION SECURITY [9]

Does the business partner have requirements for information security and cybersecurity in its internal legal acts (policies, rules, procedures, etc.)?

☐ Yes ☐ No

(if you selected "Yes", provide the information requested below)

Document title	Link to the document (if publicly available)

Does the business partner have an information security management system in place in accordance with ISO/IEC 27001:2022 and hold a valid certificate?

☐ Yes ☐ No

(if you selected "Yes", provide the information requested below)

Certificate name	Certificate No.	Date of issue

If the answer to the above question is "No," has the business partner conducted an external information security cybersecurity audit in accordance with the requirements of ISO/IEC TS 27006-2:2021, during which compliance with at least 80% of the requirements was established?

☐ Yes ☐ No

(if you selected "Yes", provide the information requested below)

Date of audit	Audit subject	Name of the auditing company

Does the business partner implement an access control policy based on the principles of "need to know" and "least privilege access," use a multi-factor access authentication system, and can demonstrate this?

☐ Yes ☐ No

Does the business partner stipulate information security requirements in contracts with subcontractors and is able to prove this?

☐ Yes ☐ No

Has an external audit/investigation been initiated or is currently being conducted in relation to the business partner over the past 3 years for a crime against the security of electronic data and information systems (Article 96 of the Criminal Code of the Republic of Lithuania. Illegal interference with electronic data, Article 197. Illegal interference with an information system, Article 198. Illegal acquisition and use of electronic data, Article 1981. Illegal access to an information system, Article 1982. Illegal possession of devices, software, passwords, codes, and other data)?

☐ Yes ☐ No

(if you selected "Yes", please provide information about such investigations/checks below)

No.	Authority that conducted/is conducting the investigation/inspection	Nature of the investigation/inspection	Date of completion/planned completion of investigation/inspection	Results of the investigation/inspection and measures taken (if known)
1.				
2.				

11. CONFIRMATIONS

BY SIGNING THIS QUESTIONNAIRE, THE BUSINESS PARTNER CONFIRMS THAT:

- the information provided in the questionnaire is accurate and complete;
- the person completing the questionnaire has full authority to represent the business partner;
- Upon signing an agreement with any company belonging to the "EPSO-G" group of companies and changing the data provided in the questionnaire, inform us by email at tiekejuklausimai@epsog.lt or directly inform the person responsible for monitoring the performance of the agreement.

EXPLANATIONS

[1] **At the time of completing the questionnaire, the UAB "EPSO-G" group of companies consists of the following companies:** UAB "EPSO-G", UAB "EPSO-G" Invest", AB "Amber Grid", LITGRID AB, BALTPOOL, UAB, Energy cells, UAB, and UAB "TETAS".

[2] **Politically exposed persons** - natural persons who are or have been entrusted with prominent public functions, and their immediate family members or close associates.

[3] **Close family members** – spouse, cohabitant, person with whom a registered partnership has been established, parents, brothers, sisters, children and their spouses, children's cohabitants.

[4] **Close assistant:**

1) a natural person who is a participant in the same legal entity or organization without legal entity status as a person who holds or has held an important public position, or who maintains other business relations with such a person;

2) a natural person who is the sole beneficiary of a legal entity or an organization without legal personality established or operating de facto for the purpose of obtaining financial or other personal gain for a person who holds or has held an important public position.

[5] **Important public positions** – positions in the Republic of Lithuania, the European Union, international or foreign institutions:

1) the head of state, head of government, minister, deputy minister or assistant minister, secretary of state, chancellor of parliament, government or ministry;

2) member of parliament;

3) member of supreme courts, constitutional courts, or other supreme judicial institutions whose decisions cannot be appealed;

4) mayor of a municipality, director of a municipal administration;

5) a member of the governing body of the supreme audit and control institution of a state or the chairperson, deputy chairperson, or member of the board of the central bank;

6) ambassador, chargé d'affaires, commander of the Lithuanian Armed Forces, commanders of armed forces and units, chief of the Defense Headquarters, or high-ranking officers of the armed forces of foreign states;

7) a member of the management or supervisory body of a state-owned enterprise, joint-stock company, or closed joint-stock company, whose shares or part of shares, granting more than 1/2 of all votes at the general meeting of shareholders of these companies, are owned by the state;

8) municipal enterprises, public limited companies, private limited companies whose shares or part of shares, granting more than 1/2 of all votes at the general meeting of shareholders of these companies, are owned by the municipality and are considered large companies under the Law on Accounting of the Republic of Lithuania, a member of the management or supervisory body;
9) the head of an international intergovernmental organization, his or her deputy, or a member of its management or supervisory body;
10) the head of a political party, his or her deputy, or a member of its management body.
[6] **Beneficiary** – a natural person who is the owner of or controls the customer (legal entity or foreign company) and/or a natural person on whose behalf a transaction or activity is carried out. The beneficiary is considered to be:
1) in a legal entity:
a) a natural person who owns or controls a legal entity directly or indirectly by holding a sufficient percentage of the shares (stocks, parts, etc.) or voting rights of that legal entity, including through the management of registered shares; except for joint-stock companies whose securities are traded on regulated markets subject to disclosure requirements equivalent to those laid down in European Union legislation or equivalent international standards, or by controlling it in other ways. A natural person who holds 25 percent and one share (share, part, etc.) or more than 25 percent of the client's ownership interest is considered a direct owner. A natural person (persons) controlling a company or several companies that hold 25 percent and one share (share, part, etc.) or more than 25 percent of the client's ownership interest shall be considered indirect owner(s).
b) in a legal entity whose identity is established, the natural person who holds the position of senior manager, if the person referred to in point a) is not identified or if there are doubts that the identified person is the beneficiary;
2) in trust funds – all of the following persons:
a) the settlor(s);
b) the trustee(s);
c) the custodian(s), if any;
d) natural persons who benefit from a legal person or an entity without legal personality, or, if these persons are not yet identified, the persons whose interests that legal person or entity without legal personality is established or operates to represent;
e) any other natural person who effectively controls the trust fund through direct or indirect ownership or other means;
3) in a legal entity that administers and distributes funds, in a trust-like entity – a natural person performing duties equivalent to those specified in point 2.
[7] **International sanctions** – decisions of the European Union, the United Nations, and other international organizations of which the Republic of Lithuania is a member or in which it participates, which are directly applicable to the Republic of Lithuania or implemented in accordance with the procedure established by the Law on International Sanctions of the Republic of Lithuania.
[8] **Target territory** – a foreign country that meets the criteria set out in the Law on Income Tax of the Republic of Lithuania and is included in the list established by the Minister of Finance of the Republic of Lithuania. The list is available via this link - https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.157288/asr. A country is included in the list if it meets at least two criteria:
1) the equivalent tax rate in that territory is less than 75% of the rate set out in Article 5(1) clause 1 of this Law;
2) different rules for equivalent taxation are applied in that territory, depending on the state in which the controlling person is registered or otherwise organised;
3) different rules for equivalent taxation are applied in that territory, depending on the state in which activities are pursued;
4) the controlled taxable entity has concluded an agreement with the tax administrator of that state concerning the tax rate or tax base;
5) there is no effective exchange of information in that territory;
6) there is no financial and administrative transparency in that territory: the rules for tax administration are not entirely clear and the procedure for applying such rules is not presented to the tax administrators of other states.
[9] This part of the questionnaire applies to partners who will provide services, perform work, or supply equipment for purchases related to the design, development, implementation, maintenance, modernization, and/or cyber security of networks and information systems (regardless of the contract value) (procurement related to the design, implementation, maintenance, and modernization of networks and information systems also include the procurement of construction, reconstruction, operation works, and services, in the scope of which the partner will perform the installation, maintenance, and modernization of systems and/or equipment).