

PARTNER CODE OF ETHICS OF EPSO-G GROUP OF COMPANIES

Purpose:	Define minimum standards of conduct that EPSO-G group companies expect all their Partners to adhere to, thereby promoting lawful, professional, harmonious, and fair business practices that cover objectives of environmental protection, human rights, labour standards, and business ethics. The Partner Code of Ethics is based on the principles of the United Nations Global Compact.
Scope of application:	All Partners of the Group companies who, in the course of their activities, provide services, supply goods or perform work for the Group companies or carry out activities on their behalf or act under cooperation contracts, have concluded agreements on participation in administered exchanges (hereinafter referred to as the Partners).

1. General provisions

The sustainable activity objective of EPSO-G Group of Companies is to implement the transformation of the energy sector, by ensuring a harmonious balance between environmental, social, and economic objectives, and thereby contributing to the creation of a climate-neutral economy. The Group companies are responsible for the smooth implementation of strategic energy projects that are important to the Lithuanian state, in accordance with the highest standards of environmental protection, business ethics, transparency, and occupational health and safety. Therefore, the role of all partners is extremely important in EPSO-G's efforts to achieve sustainable operations.

The Group is committed to ensuring the implementation of sustainability principles in all its activities. Therefore, it seeks to create an organisational culture that is based on shared responsibility for occupational safety and health, human rights protection, transparency and business ethics, care for employees and local communities, environmental protection and conservation of natural resources at all stages of the activities. The EPSO-G Group of Companies strives to apply these principles in its cooperation with all its Partners.

The Group expects that its Partners will follow this Partner Code of Ethics and the principles set out therein, which will form the basis not only for constructive cooperation but also for greater progress in the field of sustainability.

The Partner Code of Ethics of EPSO-G Group of Companies has been prepared in accordance with the Group's approved policies, as well as with the Code of Ethics of the Group. The Partner Code of Ethics is also based on international agreements such as the United Nations Universal Declaration of Human

Rights, Conventions of the International Labour Organisation, the United Nations Aarhus Convention, the United Nations Global Compact, the United Nations Convention against Corruption.

2. Business ethics

In carrying out their activities, the Group Partners must comply with all laws and other regulatory acts applicable to them. The Partners must also adhere to the highest standards of business ethics and:

- 2.1. pursue their activities in accordance with the principles of fair competition, not to participate in any form of prohibited agreements (e.g. agreements on the division or allocation of markets or customers, or agreements on prices) that restrict fair competition.
- 2.2. avoid situations that could give rise to conflicts of interest in their activities. In the event of a potential or actual conflict of interest with the Group companies, immediately notify all parties concerned (including responsible persons of the Group companies) and promptly take measures to manage and/or eliminate the conflict of interest.
- 2.3. adhere to a zero-gift policy, both in accepting and giving gifts, except for gifts that comply with international protocol requirements and/or traditions, official business or representation gifts, provided that this is not prohibited by any applicable laws and regulations and such gifts are appropriate for maintaining business relations, avoid the provision of goods, services or work free of charge in order to obtain an unfair advantage;
- 2.4. refrain from making any unlawful payments to civil servants, political parties, politicians, candidates for political office or other persons;
- 2.5. comply with legal requirements relating to the provision of charity or support;
- 2.6. not tolerate bribery, corruption, influence peddling, money laundering, abuse of office or any other form of corruption; not to offer, pay or promise any unlawful remuneration or other unlawful benefits to its customers, Partners or their representatives, and not to accept such from them, not to cheat, deceive or otherwise refrain from unlawful acts;
- 2.7. seek to implement measures to manage the risk of corruption and, in accordance with the procedure established by applicable law, report possible cases of corruption to the responsible authorities and take measures to prevent the recurrence of corruption in the future;
- 2.8. assess the possibilities of implementing internationally recognized anti-corruption management systems, such as ISO 37001 or an equivalent international standard, especially in cases where the Partners have identified a high risk of corruption;
- 2.9. ensure the security and confidentiality of information entrusted to the Group companies, and process personal and other data in accordance with the law and the provisions of agreements signed with the Group companies.

- 2.10. ensure the implementation of international sanctions imposed by the laws of the Republic of Lithuania and the European Union, have no ties with persons subject to international sanctions or persons associated with them.
- 2.11. by means of activities carried out to support national security interests, avoid cooperation with economic entities, including manufacturers of goods, service providers, registered or established outside the European Union, the North Atlantic Treaty Organization, the European Economic Area, and (or) the Organization for Economic Cooperation and Development;
- 2.12. When carrying out activities and using artificial intelligence (AI) or other automated decision-making tools, follow the EU Act on Artificial Intelligence, the Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law, and the UNESCO Recommendation on Ethics of Artificial Intelligence.

3. Human rights

The Partners shall undertake to respect human rights and to treat all their employees with respect, without violating their dignity. The Partners shall ensure that their employees have all possibilities to enjoy fundamental human rights and undertake to:

- 3.1. have a clearly defined equal opportunities policy or internal rules that ensure equal opportunities for all employees. It is also recommended to periodically evaluate the effectiveness of these documents and update them when necessary.
- 3.2. ensure that recruitment, performance management, promotion, training, remuneration and dismissal processes are based on objective criteria, without discrimination on the basis of race, gender, age, disability, nationality, religion, family or social status, having children, sexual orientation or other characteristics.
- 3.3. ensure that no form of psychological, physical, sexual or verbal harassment, intimidation, threats, bullying or abuse is tolerated in their activities. The employees of the Partners should know how to report violations, and violations should be properly investigated and the offenders should face appropriate consequences.
- 3.4. respect employees' freedom of expression and their right to privacy, refrain from any action that could restrict or otherwise adversely affect the expression of these freedoms.
- 3.5. when collecting personal data or implementing employee monitoring measures respect the privacy rights of its employees, customers and other parties involved in these activities.
- 3.6. ensure the safety of persons reporting and witnessing human rights violations or similar incidents.
- 3.7. adhere to the principles of respect for cultural diversity, rights and practices of local communities, especially when operating internationally or in sensitive areas.

4. Work standards

The Partners shall undertake to adhere to high standards of work. The Partners shall create for their own employees and those of their subcontractors a working environment that would enable them to perform their work tasks safely, properly and productively, and shall undertake to:

- 4.1. conclude employment contracts with their employees that comply with legal requirements, which clearly define working conditions, the number of working hours, conditions for overtime pay, remuneration and the frequency of payment of wages.
- 4.2. pay wages on time to all their employees, and provide clear information on their wages and additional payments for each period;
- 4.3. respect the right of their employees to form and join trade unions, work councils, and conduct collective bargaining without fear of reprisals.
- 4.4. not tolerate any form of child labour (under the age of 14), and apply additional benefits and guarantees for employees under the age of 18.
- 4.5. ensure that no form of slavery, forced labour, prison labour, bonded labour, human trafficking or physical punishment is used in the activities.
- 4.6. ensure safe and healthy working conditions by implementing procedures, certified health and safety management systems, safety programmes and solutions aimed at eliminating the risk of accidents, injuries and illnesses related to work among the Partner's employees.
- 4.7. taking into account the specifics of the work performed by their employees, conduct occupational safety and health briefing, work safety training, ensure compliance with requirements and instructions, provide the employees with collective and personal protective equipment, appropriate work tools, organise training to improve qualifications as necessary.
- 4.8. enable their employees to report unsafe working conditions to the Partner's responsible persons, and to properly investigate the reports received and eliminate any non-compliance identified.

5. Environmental protection

The Partners shall pursue their activities with the aim of minimizing negative impacts on the environment. In compliance with environmental protection laws and regulations, the Partners shall also undertake to:

- 5.1. use as little as possible or no hazardous chemicals, or substances whose effects on human health and the environment are unclear, in the manufacture of goods, the provision of services and the performance of work, and not endanger human health or cause no harm to the environment;

- 5.2. ensure proper waste management and strive to reduce the amount of waste generated by its activities;
- 5.3. ensure the efficient use of natural resources and energy and increase the use of energy from renewable sources in their activities.
- 5.4. when applying the principles of the circular economy, strive for responsible, environmentally friendly raw material supply, seek to include environmental criteria in their procurement procedures, and when developing products, take into account criteria such as environmental friendliness, energy efficiency, reuse, or recyclability.
- 5.5. as far as possible and proportionate, carry out an assessment of the risks of the environmental impact of their activities and seek to prevent such risks from occurring, also set targets for the environmental impact of their activities, and implement appropriate measures.
- 5.6. when participating in public procurement procedures announced by Group companies, wherever possible, give priority to products with Type I eco-labelling (in accordance with LST EN ISO14024), and in the case of goods, services or works, give preference to those with more environmentally friendly characteristics, when assessed in terms of life cycle costs.
- 5.7. when performing work or providing services in areas and at Group facilities located near residential areas, operate in such a way as to avoid negative impacts on the environment, infrastructure or property important to local communities, and, where such impacts occur, implement proportionate remedial or compensatory measures to ensure that the interests of local communities and their living, social and economic environment are not adversely affected.
- 5.8. seek to systematically manage the negative impact on the environment by applying the environmental management standard LST EN ISO 14001 (or a similar European Union or other international standard) or by drawing up an environmental protection programme, that would assess risks of negative environmental impacts arising from activities and measures of their management.
- 5.9. set targets for reducing the climate impact of own activities, including greenhouse gas emissions accounting, and its reduction. It is also recommended to include these aspects in own operational plans and annual reports.
- 5.10. use raw materials and products that have a lower environmental impact throughout their life cycle, as well as integrating sustainability assessment criteria into their procuring and operational processes.

6. Monitoring compliance with the Partner Code of Ethics

- 6.1. Partners shall develop, implement and maintain effective measures to ensure compliance with the provisions of this Partner Code of Ethics, and, upon request, provide documentation

- confirming the effectiveness of the measures applied, data and other additional explanations required by the Group company. Such requests submitted by the Group companies and the measures applied by the Partners shall be proportionate to the size, complexity and risk environment of their business.
- 6.2. The Partner is encouraged to seek for its subcontractors to comply with this Partner Code of Ethics.
 - 6.3. The Group companies seek to cooperate with Partners that comply with the provisions of this Partner Code of Ethics. Therefore, before engaging Partners, they have the right to carry out their verification procedures in accordance with the procedures laid down in internal legislation, requesting them to complete questionnaires or provide other information. If a Partner fails to complete the questionnaire, the Group companies shall be entitled to take appropriate decisions regarding further cooperation.
 - 6.4. The Partner must take all possible measures to eliminate any non-compliance with the provisions of this Partner Code of Ethics identified or observed during the inspection of the Partner or of the Group companies, seek to remedy them within a reasonable period of time, and inform the responsible persons of the Group companies thereof.
 - 6.5. Refusal by the Partner to provide information or explanations, evasion or delay in providing them, provision of incorrect information, as well as avoiding rectifying the identified non-compliances may be considered a gross violation of this Partner Code of Ethics.
 - 6.6. In the event of a gross violation of the Partner Code of Ethics, the Group companies reserve the right to assess the consequences of such behaviour by the Partner within the scope of the contract concluded with the Partner (e.g., not to extend the term of the contract, to oblige to perform certain actions to eliminate the consequences of the violation, etc.).
 - 6.7. Partners must be able to ensure the traceability of their supply chain: identify sources of supply, subcontractors, and production sites, and provide information on the origin of raw materials.
 - 6.8. At the request of the Group company, the Partners provide information on environmental, social and governance (ESG) indicators of their activities, including occupational safety, environmental protection, diversity and management transparency.
 - 6.9. The Partners are encouraged to report, to the contact person of the Group specified in the contract or to the trust line of the Group, the suspected or actual violation of the provisions of this Partner Code of Ethics, or when encountering difficulties in correcting the recorded non-compliances:
 - 6.9.1. using the reporting form <https://pranesk.epsog.lt>;
 - 6.9.2. by e-mail – pranesk@epsog.lt;

- 6.9.3. by sending information by post to the address of the registered office of the Company – Laisvės pr. 10, Vilnius, to the Head of Business Resilience of “EPSO-G” Group with the additional note “confidential, do not open”;
- 6.9.4. using the contact details available on the website, when providing information to the Head of Business Resilience of “EPSO-G” Group: <https://www.epsog.lt/lt/apie-mus/pasitikejimo-linija>.