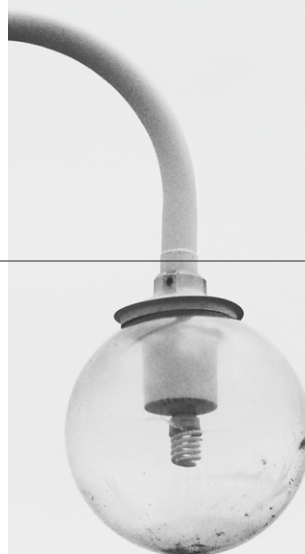


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# Information on compliance with transparency guidelines

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## Information on compliance with transparency guidelines

EPSO-G (hereinafter – **EPSO-G** or the **Company**) and its subsidiaries comply<sup>1</sup> with the Resolution No 1052 of the Government of the Republic of Lithuania as of 14 July 2010 on the Approval of the Description of the Guidelines for Ensuring the Transparency of State-Owned Enterprise Activities (hereinafter – the Transparency Guidelines). The Transparency Guidelines are subject to mandatory application by EPSO-G UAB, as EPSO-G UAB is a state-owned enterprise (hereinafter – **SOE**). To implement the compliance with the Transparency Guidelines in EPSO-G UAB group of companies, the policy of transparency and communication of the activities of EPSO-G UAB group of companies was adopted at the Group's level with a detailed regard to requirements set out in the Transparency Guidelines and their established application for the companies of EPSO-G UAB group of companies.

The implementation of the Transparency Guidelines by EPSO-G UAB is materially ensured through information disclosure in the annual report and ant the disclosure of the information on EPSO-G UAB website aiming to submit the information for stakeholders in an accessible and understandable format.

Article 3 of the Transparency Guidelines states that SOE shall comply with the provision of the Corporate Governance Code<sup>2</sup> for companies listed in Nasdaq Vilnius AB related to public disclosure of information. Information on EPSO-G compliance with the provisions of this Code is set out in Annex II to EPSO-G Annual Report, entitled "EPSO-G UAB Report on Compliance with the Corporate Governance Code for Listed Companies on Nasdaq Vilnius AB".

### Structured information on the implementation of the Transparency Guidelines is presented below:

<b>INFORMATION / OTHER REQUIREMENTS SUBJECT TO PUBLICATION ON EPSO-G WEBSITE (<a href="http://WWW.EPSOG.LT">WWW.EPSOG.LT</a>):</b>	
Name and code of the Company and register where data about the Company is stored and kept, address	Executed
Legal status subject to reorganization (the method of reorganization shall be indicated), liquidation or bankruptcy of EPSO-G	Not applicable
Information about the state representing institution, i.e. the Ministry of Energy and a link to its website	Executed
Operational goals, vision and mission	Executed
Structure	Executed
Data of Director General*	Executed
Data of Chairman and members of the Board*	Executed
Data of Chairman and members of the Supervisory Board*	Not applicable
Names of committees, details of their chairmen and members*	Executed
<b>*The following data is published:</b> name, surname, date of commencement of current positions, other current management positions in other legal entities, education, qualification, professional experience; it shall be indicated whether a member of the collegial body has been elected or appointed as an independent member.	
Amount (in euro to the nearest cent) and percentage of the nominal value of the state-owned shares in EPSO-G share capital	Executed
Special obligations are fulfilled, which are determined in accordance with the recommendations approved by the Minister of Economy and Innovation of the Republic of Lithuania: the objective of special obligations, the state budget appropriations allocated to them in the current calendar year and legal acts assigning SOEs with the performance of a special obligation are indicated, the conditions for the performance of the special obligation and / or regulated pricing are set.	Executed

<sup>1</sup> In accordance with Article 17.11 of the Transparency Guidelines, in the event of non-compliance with the Transparency Guidelines, explanations shall be provided.

<sup>2</sup> "The Corporate Governance Code for the Companies Listed on NASDAQ Vilnius" approved on 15 January 2019 by Board meeting of Nasdaq Vilnius AB, protocol No. 19-63

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**INFORMATION / OTHER REQUIREMENTS SUBJECT TO PUBLICATION ON EPSO-G WEBSITE (WWW.EPSOG.LT):**


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Information on social responsibility initiatives and measures, important ongoing or planned investment projects	Executed
If EPSO-G is a participant in other legal entities (does not apply to subsidiaries and downstream subsidiaries), the name, code and register of such legal entities in which the Company's data are collected and stored, registered office (address), website addresses	Not applicable
EPSO-G set of annual financial statements, EPSO-G annual report, and auditor's report on the annual financial statements of EPSO-G shall be published on EPSO-G website within 10 working days of the approval of the annual financial statements	Executed
EPSO-G set of interim financial statements, EPSO-G interim annual reports shall be published on the website not later the 2 months after reporting period	Executed

**CONSIDERING THAT EPSO-G IS PATRONIZING COMPANY ADDITIONAL INFORMATION SHALL BE PUBLISHED ON THE EPSO-G WEBSITE (WWW.EPSOG.LT):**


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Structure of EPSO-G group companies	Executed
<b>EPSO-G subsidiaries and downstream subsidiaries:</b>	
Name and code of the Company and register where data about the Company is stored and kept, registered office (address)	Executed
Website addresses	Executed
Percentage of EPSO-G shares in the companies' share capital	Executed
Consolidated financial statements and consolidated annual reports	Executed

**THE DOCUMENTS / OTHER REQUIREMENTS SUBJECT TO PUBLICATION ON EPSO-G WEBSITE (WWW.EPSOG.LT):**


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EPSO-G articles of association	Executed
Letter from the Ministry of Energy on the setting of state objectives and expectations for EPSO-G	Executed
Operational strategy or a summary in cases when it contains confidential information or information treated as a commercial (industrial) secret	Executed
Remuneration policy including the remuneration of EPSO-G management and the remuneration of members of collegiate bodies and committees set up by EPSO-G	Executed
EPSO-G annual and interim reports	Executed
The sets of annual and interim financial statements reports and auditor's reports on the annual financial statements for the period not less than j years	Executed
The documents listed above are published in PDF format and technical possibilities for printing	Executed

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**OTHER REQUIREMENTS SUBJECT TO PUBLICATION / IMPLEMENTATION IN THE ANNUAL REPORT AND THE SET OF FINANCIAL STATEMENTS:**


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The accounting of EPSO-G shall be administered according to the International Financial Reporting Standards.	Executed
EPSO-G is preparing a set of interim financial statements for six months	Executed
Additionally to annual report EPSO-G is preparing interim report for six months	Executed
<b>In addition to the requirements set by the Law on Financial Reporting of the Republic of Lithuania the EPSO-G annual report shall contain<sup>3</sup>:</b>	
Short description of EPSO-G business model	Executed
Information on major events during and after the financial year (prior to the preparation of the annual report) which had substantial impact on the activity of EPSO-G	Executed
Results of the implementation of the goals set in operational strategy	Executed
Ratios of profitability, liquidity, asset turnover and debt	Executed
Fulfilment of special obligations	Executed
Implementation of investments policy, investment projects in progress and planned and investments during the reporting period	Executed
Implementation of risk management policy applied by EPSO-G	Executed
Implementation of dividends policy	Executed
Implementation of the remuneration policy	Executed
General annual wage fund, average monthly salary according to position and (or) departments	Executed
For SOEs that are not required to prepare report of social responsibility it is recommended to provide information related to environmental, social and personnel, human rights, anti-corruption and bribery accordingly in annual report or annual activity report	Executed
Consolidated annual report contains structure of the group of companies, name and code of each subsidiary and the register where company data is stored and kept, registered office (address), part (percentage) of shares held in the authorized capital of the subsidiary, financial and non-financial results of the financial year	Executed
EPSO-G interim annual report contains short description of EPSO-G business model, analysis of financial operating results of the reporting period, information on major events of the reporting period, and also ratios of profitability, liquidity, asset turnover and debt including its changes in comparing to previous year period	Executed

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<sup>3</sup> If the information is treated as SOE's commercial (industrial) secret or confidential information, SOE shall not disclose such information, therefore it should be indicated in SOE's annual report including reason for non-disclosure..