

POLICIES OF ETHICAL EMPLOYMENT AND WORKING CONDITIONS

GENERAL PROVISIONS

AB Amber Grid (hereinafter referred to as the “Company”) as Lithuania’s natural gas transmission system operator that is responsible for a safe and reliable transmission of natural gas to system users and for the operation, maintenance and development of natural gas infrastructure, in pursuit of its strategic goals, consistently follows the recommendations of the International Standard ISO 26000–Guidance on Social Responsibility, the United Nations Global Agreement, BS OHSAS 18001:2007 Standard of the Occupational Safety and Health Management System, the International Labour Organisation (ILO) conventions and the applicable provisions of the national and international law. The Company seeks to be an employer that promotes equal opportunities and ensures a safe, healthy, professional and efficient working environment for all its employees.

The purpose of the Policies is to identify the main principles and requirements of the Company's ethical conduct in respect of its employees and to ensure full compliance with them.

CHILD LABOUR

Employment of children shall be strictly prohibited (ILO Conventions No. 79; 138; 182).

FORCED AND COERCED LABOUR

Forced employment shall be strictly prohibited (ILO Conventions No. 79; 29; 105).

The Company shall not practise any forms of forced or coerced labour, including any involuntary labour relations or any imposition of any specific conditions, or any withholdings of either collateral security, or personal documents, or any restraining of free movement.

HEALTH AND SAFETY

The Company shall ensure a safe and healthy working environment through a systematic assessment of potential hazards and through continuous measures to address the underlying causes (ILO Conventions No. 155, 164 and ILO-DSS-2001). With the aim of strengthening the safety and health of its employees, the Company has implemented an Occupational Safety and Health Management System and included all its employees in this activity.

FREEDOM OF ASSOCIATIONS AND RIGHT TO COLLECTIVE BARGAINING

The Company follows the United Nations provisions for human rights and workers' rights to freedom of association and collective bargaining. The Company undertakes not to apply any measures restricting the said rights of its employees (ILO Conventions No. 87; 98).

DISCRIMINATION

All forms of discrimination shall be strictly prohibited (ILO Conventions No. 100; 111).

The Company shall ensure equal rights for all its employees and shall not tolerate discrimination in employment, remuneration, training, career, termination of employment or retirement, or in other areas due to race, nationality, gender, sexual orientation, age, political views, or any other aspects which could give rise to discrimination, and it shall not tolerate any forms of bullying, harassment or exploitation among its employees.

DISCIPLINARY PRACTICES

The Company shall treat all its employees with respect and shall protect its employees' dignity. The Company shall not tolerate any physical or psychological abuse, crudity or insulting. Disciplinary liability applied shall comply with applicable provisions of legal acts of the Republic of Lithuania.

WORKING HOURS

The Company shall ensure compliance of its employees' working times with applicable provisions of legal acts of the Republic of Lithuania. At an employee's request, the beginning and the end of individual working times may be subject to adjustments, taking into consideration requirements of the work and rest regime, upon coordination with the direct supervisor of the employee in question. Overtime may be worked in cases as provided for by applicable legislation, and any such overtimes shall be compensated for in accordance with the procedure established by law.

REMUNERATION

All employees shall be paid a remuneration with the set periodicity and at the agreed rates. The remuneration paid shall be not lower than the statutory minimum wage.

FINAL PROVISIONS

The Company shall continuously monitor the implementation of the present Policies in day-to-day operations of the Company, to periodically review the relevance and adequacy of the Policies in order to improve them in line with any subsequent changes in regulatory provisions.

Upon noticing any instances of non-compliance with the present Policies, you are kindly requested to issue a notification by calling the Company's Confidence Hotline Tel. No.: +370 666 06 084; +370 5 2327787, E-mail sauga@ambergrid.lt or notify the the Company's Work Council.

The Company seeks to achieve that all existing and new persons involved in the Company's activities would also follow the principles established herein.