



Integrated Annual Report

2025



Annual Management Report, Sustainability Report, and the Company's Financial Statements prepared in accordance with International Financial Reporting Standards as adopted by the European Union, for the financial year ended 31 December 2025.

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Chairman's Foreword

Dear all,

In 2025, our targeted efforts were focused on strengthening infrastructure, competencies, and organizational resilience. We opened the year with the selection of a new Company's CEO, where Nemunas Biknius was appointed. This gave an opportunity to continue with the planned strategic directions.

Particular attention is paid to the security of the main gas pipeline. We have performed internal diagnostics and spearheaded long-term solutions, ensuring sound operation of the gas transmission system in the future. The incident at the Pabradė Training Area in the spring proves the relevance of reinforcing prevention, and enhancing public and institutional relations to avoid undue risks posed by activities near the infrastructure.

Proceeding with further infrastructure modernization, we have opened a new System Control Centre, signed a contract for the electrification of the Jauniūnai Compressor Station, and have launched the procurement of the reconstruction of the Panevėžys Gas Compressor Station. We have engaged in a dialogue with the regulator on relining critical gas pipeline sections as required to ensure the reliability of the system.

For the first time, Amber Grid has prepared and presented a network optimization plan to the Board, and has initiated joint electricity, gas, and hydrogen system development scenarios as the basis for ten-year development plans. Our aim is to ensure effective use and development of transmission system meeting the actual needs for both, Lithuania and the region.

The completed sale of GET Baltic is also worth mentioning. From now on, Baltic gas suppliers form an integral part of a single trading system, the European Energy Exchange AG. This has strengthened gas market integration and improved regional competitiveness.

We have kept our efforts continued our focus on green gas, progressing to the next phase of the Hydrogen Corridor and initiating technical and economic feasibility studies, financially supported by the European Union. The Company is strengthening its excellence in green hydrogen and synthetic fuels, and has carried out and published an analysis of the potential for synthetic fuel production, export and storage. To make decisions driven by market demand and trends, we conduct market surveys on a regular basis. We also observe the upwards trend in the biomethane sector, while the connection to the AIB Hub has paved the way for further green gas development and opened up international biomethane trading opportunities.

We continue to extend our support to Ukraine: 55 vehicles and 4 generators were handed over to Ukrainian emergency services in 2025. From the outbreak of large-scale war in 2022, we have provided support and humanitarian assistance to Ukraine for EUR 172 thousand.

Looking ahead to 2026 and beyond, we see definite trends. Gas consumption in Lithuania does not show any decrease, marking the start of the year with new record-high consumption and transmission levels. Cold spells further underscored the importance of gas infrastructure for the Lithuanian and European economy and resilience.

We will maintain the Company's focus on strengthening the resilience of the system by investing in physical and cyber security, business continuity plans, and employee professional development. Occupational safety and competency building also remains a priority.

I thank all - employees, management personnel and the Board for the trust and joint efforts. Through consistent implementation of the Amber Grid's Strategy, we continue to strengthen the Company as a solid pillar of the



energy system and an active player in the development of green gas and new technologies.

Yours faithfully,

Chairman of the Board of Amber Grid

Paulius Butkus

CEO statement

Dear colleagues, partners and customers,

In this Amber Grid Integrated Annual Report, we present a comprehensive overview of the year 2025 – our operating principles, values, key operational and financial indicators, and the strategic directions we continue to pursue.

The past year was marked by significant structural changes in the national gas sector. Although overall gas consumption in Lithuania decreased due to lower demand from the fertilizer industry, international gas flows increased, further strengthening the strategic importance of our system: gas flows to Latvia and Poland grew substantially, while export volumes were driven by rising demand in Ukraine.

Imports through the Klaipėda LNG terminal reached 30.5 TWh, enabling an increase in international flows. Gas flows to Latvia grew by nearly one-third, and to Poland – almost twofold. The latter increase was driven by the opportunity to redirect part of the gas to meet newly emerging demand in Ukraine. Overall, international gas flows grew by 15 percent last year. In the coming years, we aim to fully leverage the system's potential by attracting new clients from across Europe.

In 2025, we completed the strategic process launched in early 2023 – the transfer of GET Baltic shares to our partner, European Energy Exchange AG (EEX). The integration of GET Baltic into one of Europe's largest energy exchanges strengthened regional market liquidity, increased competition, and provided market participants with access to more advanced trading tools and a broader range of services. This is an important step for the development of the gas markets in Lithuania, Latvia, Estonia and Finland.

The geopolitical situation remains tense, so we place particular emphasis on the safety and reliability of the gas transmission system. Energy security is the foundation of the country's sustainable development. We continuously carry out technical inspections, maintenance and restoration works, and business resilience remains a priority in our daily operations. Last year, for the first time, we held national-level complex emergency exercises at the Jauniūnai gas compressor station, where together with responsible institutions we tested preparedness for extreme and hybrid incident scenarios.

The year was also important for hydrogen-related legislation. A working group of the Ministry of Energy began drafting the Hydrogen Law and amendments to energy legislation, transposing EU directives and creating conditions for the development of the hydrogen market and infrastructure. The draft outlines a clear framework for sector organisation, licensing, network development and compensation, and includes the necessary legal analysis for hydrogen network design and construction. Parliamentary deliberations are planned for the spring – a significant step in Lithuania's energy transition and the strengthening of the green economy.

In 2026, we will devote considerable attention to preparing secondary legislation on network operation, installation and protection, and we will participate in the development of the EU Network Package, which will accelerate the expansion of cross-border energy networks, reduce administrative burdens and enable financing for critical infrastructure security and resilience.

Another important direction is the biomethane market. Five biomethane producers are already connected to Lithuania's transmission system, one to the distribution system, and nine more are preparing to connect within the next couple of years. In 2025, around 277 GWh of biomethane was injected into the transmission and distribution systems, and by 2028 injection volumes are expected to reach approximately 815 GWh. Trade and investment will be



further stimulated by Lithuania's 2025 accession to the international biomethane guarantees of origin trading platform.

With increasing attention to sustainable operations, Amber Grid has begun monitoring a broader range of sustainability indicators. We aim to adhere to the highest sustainability governance standards so that these principles are not only declared but genuinely integrated into strategic decisions and daily activities. We prepare our sustainability report voluntarily, seeking to align as closely as possible with European sustainability reporting standards.

These ambitious goals cannot be achieved alone. That is why I highly value Amber Grid's membership in the EPSO-G group of companies. Together we can achieve far more than individually. Cooperation and synergy within the group bring significantly greater benefits than working in separate areas.

Looking back at 2025, I would like to sincerely thank the Amber Grid team for their dedication, professionalism and consistent work in the energy sector. I also thank our clients, partners and shareholders for their trust and cooperation. The year 2026 has already begun with new ideas, planned investments and necessary changes. As we pursue long-term goals, we are ready to seize emerging opportunities, overcome upcoming challenges and create value for both our clients and the state. I am confident that together we will be even stronger.

Sincerely,

Nemunas Biknius

CEO of Amber Grid

01

„Amber Grid“ – who we are



- 1.1. Basic details
- 1.2. Performance indicators
- 1.3. Membership

1. „Amber Grid“ – who we are

The management report covers the reporting period for the year 2025.

1.1. Basic details

Company name	Amber Grid AB (hereinafter “Amber Grid” or the “Company”)
Legal form	Public limited liability company
Date of registration and name of register	25 June 2013, Register of Legal Entities
Legal entity code	303090867
Manager of the Register of Legal Entities	State Enterprise Centre of Registers
Issued capital	EUR 51,730,929.06
LEI code	097900BGMP0000061061
Registered office address	Laisvės ave. 10, LT-04215 Vilnius, Lithuania
Phone	+370 5 236 0855
Email address	info@ambergrid.lt
Website	www.ambergrid.lt

Amber Grid is the gas transmission system operator in Lithuania, which ensures reliable and safe transporting of natural gas to its consumers through high pressure gas pipelines. The Company is responsible for the operation, maintenance and development of the Lithuanian gas transmission infrastructure consisting of a network of nearly 2,300 km-long gas pipelines and two gas compressor stations. A well-developed gas transmission infrastructure in Lithuania is convenient for transporting large volumes of energy to Poland, the Baltic States and Finland.

As part of its decarbonisation goals, Amber Grid takes active measures to look into innovative technological and market solutions and to facilitate adaptation of the Lithuanian gas transmission system to transporting green gas, including hydrogen. Amber Grid also administers the National Register of Guarantees of Origin for gas produced from renewable energy sources (RES).

Amber Grid is a part of the EPSO-G UAB group of companies (hereinafter “EPSO-G” or the “EPSO-G Group”). EPSO-G is a state-owned group of energy transmission and exchange companies, and EPSO-G UAB acts as a holding company of the EPSO-G Group, with its shareholder’s rights and obligations implemented by the Ministry of Energy of the Republic of Lithuania. For more information about EPSO-G UAB and the EPSO-G Group, see www.epsog.lt.

The Company has no branches or representative offices.

1.2. Performance indicators

The Company’s performance indicators in 2022–2025

	2025	2024	2023	2022
Quantity of gas transported to domestic exit point and used for own needs, GWh	15,901	16,947	14,913	15,576
Quantity of gas transported to adjacent transmission systems, GWh	37,414	38,361	46,326	48,213
Number of systems users at the end of the period	97	88	127	122
Length of main gas pipelines, km	2,288	2,288	2285	2285
Gas distribution stations and gas metering stations (number of units)	68	68	68	68
Number of employees at the end of the period	368	345	327	327

1.3. Membership

The Company is a member and/or participant of the following organisations: European Network of Transmission System Operators for Gas ENTSG (www.entsoe.eu), National Lithuanian Energy Association, Association Polish and Lithuanian Chamber of Commerce, EASEE-gas Association, European Renewable Gas Registry (ERGaR) and Association of Issuing Bodies (AIB),

European Clean Hydrogen Alliance, Lithuanian Hydrogen Platform, Lithuanian Hydrogen Energy Association, and other associations and initiatives relative to the Company’s business.

 <p>Association „EASEE-gas“ www.easee-gas.eu</p>	 <p>European Green Hydrogen Alliance www.europa.eu/...</p>	 <p>European Hydrogen Network Operators Association – www.ennoh.eu</p>
 <p>European Network of Transmission System Operators for Gas www.entsog.eu</p>	 <p>European Renewable Gas Registry www.ergar.org</p>	 <p>National Lithuanian Energy Association (NLEA) – www.nlea.lt</p>
 <p>Association „Infobalt“ – www.infobalt.lt</p>	 <p>Oil & Gas Methane Partnership 2.0 – www.ogmpartnership.com/</p>	 <p>Polish-Lithuanian Chamber of Commerce – www.plcc.lt</p>
 <p>„European hydrogen backbone“ initiative – www.ehb.eu</p>	<p>LITHUANIAN CO₂ PLATFORM</p> <p>Lithuanian CO₂ Platform- enmin.lrv.lt/...</p>	<p>LITHUANIAN HYDROGEN PLATFORM</p> <p>Lithuanian Hydrogen Platform – enmin.lrv.lt/...</p>
 <p>Hydrogen energy association - www.h2lt.eu</p>	 <p>Association of issuing bodies - www.aib-net.org</p>	

02

Operating Environment and Regulatory Framework



2.1. Business environment and forecast

2.2. Regulatory environment

2.3. Significant events

2. Operating Environment and Regulatory Framework

2.1. Business environment and forecast

In pursuit of full energy independence from the Russian gas, and in response to Russia's blackmailing of Europe over energy and the outbreak of war in Ukraine, as of 1 April 2022, Lithuania has weaned itself off Russian gas: the Lithuanian gas transmission system operates without imported Russian gas. Lithuania's entire gas demand is met through Klaipėda Liquefied Natural Gas (LNG) terminal, and Santaka entry point for gas from Poland, and Kiemėnai entry point for gas from Latvia.

Gas is continued to be transported to the Kaliningrad Region by transit through Lithuania, however, in an unusual technical mode, which ensures transmission of gas only to the extent necessary for the transit.

During 2025, 33.9 terawatt hours (TWh) of gas was supplied to Lithuania, excluding gas transported to the Kaliningrad Region. This was 14.6% more compared to the total quantity supplied in 2024, when 29.6 TWh of gas was transported to Lithuania. The pipeline connection to Latvia transported 12.7 TWh of gas for the needs of other Baltic States and Finland, which is by 31.3% more than 10.0 TWh transported towards the Baltic States in 2024. The pipeline connection to Poland transported 5.0 TWh of gas, which was 95.0% more compared to 2.5 TWh transported towards Poland in 2024.

Decrease in gas consumption in Lithuania in 2025 was marginal. In total 15.9 TWh of gas was consumed in Lithuania during 2025, which was 6.2% less than 16.9 TWh of gas demand in 2024.

More stringent EU environmental policy requirements introduced in the context of combating climate change, promotion and development of renewable energy sources, and more efficient use of energy will reduce consumption of natural gas for both energetic and industrial domestic needs. However, due to the limited number of alternatives in some of the industries and segments of the transport sector, and due to competitiveness while rendering balancing, reservation services in the heat and electricity sectors, natural gas will play an important role as a transitional source of energy in pursuance of pan-European and national goals to reduce greenhouse gas emissions. At the same time, gas transported via the pipelines will face changes, with green gas making up an increasing share: biomethane and gas generated through the process of conversion of green electricity – green hydrogen and synthetic methane.

On 28 June 2024, the Parliament (Seimas) of the Republic of Lithuania adopted the resolution on the Approval of the National Climate Change Management Agenda Regarding the National Energy Independence Strategy (NEIS). In its NEIS, Lithuania has set ambitious goals that will contribute significantly to the implementation of the United Nations' 2030 Agenda for Sustainable Development, and implementation of the goals set forth in the Paris Agreement, and the goals set forth in the EU's 2030 Climate and Energy Framework. They aim to increase the share of renewable energy sources (including biomethane and other RES-produced gas) in the country's total final energy consumption. The Law on Energy from Renewable Sources of the Republic of Lithuania sets a target of at least 55% of renewable energy sources in the country's total final energy consumption by 2030, with a further increase in this share.

In Lithuania, similarly as in the EU, it is expected that natural gas will continue to play an important role in the energy mix at the time of transition to a low-carbon economy. The domestic annual demand for natural gas will reach around 17 TWh by 2030, of which more than 50% will represent demand for gas as a raw material in the fertilizer production industry.

There is an urgency to transform Europe's energy system:

In response to the difficulties and disruptions in the global energy market caused by Russia's invasion of Ukraine, the European Commission (EC) launched the RePowerEU plan in 2022 to gradually phase out Russian fossil fuel imports.

As foreseen in the REPowerEU Plan, the objectives will be pursued by:

- energy savings,
- diversification of energy supplies,
- accelerated roll-out of renewable energy

Klaipėda LNG terminal continues to be the most important source of gas supply for Lithuania and the Baltic States.

During 2025, 30.5 TWh of gas or 90.0% was supplied from the terminal, 2.6 TWh or 7.5% – from Latvia, 0.6 TWh or 1.7% – from Poland, and 0.3 TWh or 0.8% from biogas producers of total gas input. Klaipėda LNG terminal capacity is fully booked until 2033, i.e. each year, 33 TWh of its capacity will be allocated to the terminal's customers.

The guarantees of origin were also issued for the biomethane which has been produced in Lithuania and fed into transmission network since the summer of 2023. By the end of 2023, 47 GWh of biomethane had been produced in Lithuania and fed into the Amber Grid's transmission system. During 2024 and 2025, 127 GWh and 277 GWh, respectively, had been fed into the natural gas transmission and distribution systems.

In 2025, three biogas producer systems were connected to the Amber Grid's transmission network, and one to the natural gas distribution network.

The gas sector and networks can effectively contribute to the creation and development of the European hydrogen economy as envisaged in the EU Hydrogen Strategy. The European Commission envisages two phases – the transition period until 2030 and the period until the hydrogen market is established in 2050.

On 13 June 2024, the hydrogen and gas decarbonisation package was adopted (hereinafter the “Gas Package”). The Package comprises a Regulation and a Directive. The aim of the initiative of the proposals stipulated in the Directive and the Regulation is to facilitate the integration of renewable and low-carbon gas, particularly hydrogen and biomethane, into the energy system. The objective is a 55% reduction in methane emissions compared to 1990 by 2030 and the achievement of the climate-neutral economy in the EU by 2050.

One of the main objectives of the Gas Package is to create the hydrogen market, develop a proper environment for investments and facilitate the development of the related infrastructure and trade with the third parties. Firstly, the access to the hydrogen infrastructure, segregation of the hydrogen production and transport activities and setting the tariffs will be governed by the market rules.

The year 2025 was dedicated to transposing the provisions of the Gas Package into Lithuanian legislation. The inter-institutional working group established by the Minister of Energy prepared the draft Law on Hydrogen and Law on Electricity, which were published at the end of the year for comments from the stakeholders.

On 13 June 2024, the EU regulation on the reduction of methane emissions in the energy sector was adopted and officially entered into force on 5 August 2024. The requirements in this Regulation aim to increase the transparency of imports of fossil energy (e.g. natural gas, oil and coal) into the EU, promote the wider application of measures to reduce methane emissions in the energy sector, and harmonize comprehensive standards for the measurement, reporting and verification (MRV) of methane emissions and guidelines. The requirements of this Regulation will have a great impact on the organization of the Company’s activities.

On December 10, 2025, the European Commission published the EU Grid Package. It presents proposals aimed at promoting investments in networks, accelerating permitting procedures for infrastructure development projects, and improving coordination of network planning at the EU level. Significant attention is given to the resilience and security of energy networks. Member States are currently submitting their positions on the package.

2.2. Regulatory environment

In December 2024, the public consultation initiated by NERC on the principles of the pricing methodology applicable from the 2026 tariff period was closed on 14 February 2025.

In May 2025, taking into account the results of the finalised public consultation, NERC updated the Methodology for Determining Revenue From and Prices for Regulated Natural Gas Transmission Activities. The updated methodology also considers the implementation of the provisions of the Regulation on Decarbonisation announced during the public consultation, which provides for a 100% discount to be applied to the internal entry point, i.e. the point for entry of green gas (biogas, hydrogen) into the transmission system.

The updated methodology will be applicable from the 2026 tariff period. There were no other significant changes in the regulatory framework in 2025.

2.3. Significant events

01
JANUARY

1st January. Acting as the administrator of LNG terminal funds and in accordance with the LNGT funds administration procedure amended by the National Energy Regulatory Council (VERT), and implementing VERT Resolution No. O3E-1469 of 27 November 2024, which established a negative additional natural gas supply security component of –25.55 EUR/(MWh/day/year) to the natural gas transmission price (taking into account the LNGT activity results of KN Energies), Amber Grid returned LNGT maintenance funds to their payers (users of the natural gas transmission system) from the beginning of 2025 until June 30.

02
FEBRUARY

14th February. In 2024, the public consultation opened by NERC regarding the reference price methodology for determining the tariffs of services provided by Amber Grid as of 2026 was ended. Some of the envisaged pricing amendments are also driven by the provisions of the Regulation on Decarbonisation, adopted in mid-2024. Taking into account comments and recommendations received through the public consultation, in 2025, NERC updated the Methodology for Determining Revenue from and Prices for Regulated Natural Gas Transmission Activities and introduced new principles of calculating prices, which were applied when setting prices for 2026.

03

MARCH

20th March, the new System Control Centre (SCC) was opened. Approximately EUR 1.6 million was invested in the project, which was completed in a year and a half. This is an important strategic investment that strengthens the country's energy security, independence, gas transmission reliability, and resilience to emergency situations.

The new System Control Centre is equipped with a modern SCADA system that enables remote monitoring and control of the entire Lithuanian gas transmission network. Continuous monitoring of gas parameters and real-time operational control ensure stable and safe management of natural and green gas flows. Using the SCADA system, engineers can operate pipeline valves in real time, allowing them to respond efficiently to system disruptions or emergency situations and reduce gas release into the atmosphere in the event of an incident.

04

APRIL

4th April. The Board of Amber Grid appointed Nemunas Biknius as the Company's CEO for a new 5-year term of office. Mr. Biknius has been in charge of the Company since April 2020, having served as interim manager for almost six months by then. Previously Mr. Biknius served as a Strategy and Development Director at EPSO-G, the shareholder of Amber Grid.

30th April. The ordinary General Meeting of Shareholders of Amber Grid resolved to distribute the Company's profit for 2024 and to grant a dividend of EUR 0.0599 per share. In total, EUR 10.7 million in dividends was paid.

05

MAY

29th May. The National Energy Regulatory Council approved natural gas transmission service prices effective from 1st January 2026. The average price for transmission services for Lithuanian consumers in 2026 will decrease by 5% to EUR 1.52/MWh compared to the 2025 price for Lithuanian consumers (1.60 EUR/MWh). The gas transmission service price makes up only a few percent of the final price paid by consumers for gas.

29th May. NERC approved a security component, with the effect from 1st January 2025, which is set negative at -43 EUR (MWh/day/year), reducing transmission tariff.

06

JUNE

25th June. By implementing the Action Plan for the Implementation of the Guidelines for Hydrogen Development in Lithuania 2025-2027 and seeking to ensure the smooth transposition of Directive (EU) 2024/1788 of the European Parliament and of the Council of 13 June 2024 on common rules for the internal markets for renewable gas, natural gas and hydrogen, amending Directive (EU) 2023/1791 and repealing Directive 2009/73/EC into national legislation, the Minister of Energy of the Republic of Lithuania established an inter-institutional working group to create a legal regulatory framework for green hydrogen and its derivatives in Lithuania.

The working group is tasked with drafting laws on the transposition of the EU Directives into national legislation and submitting a proposals for legislation necessary to establish the European hydrogen network corridor in Lithuania, which will connect Finland with Germany (Nordic-Baltic Hydrogen Corridor), as well as submitting proposals for other legislation necessary to create a favourable legal regulatory environment for green hydrogen and its derivatives.

07

JULY

1st July. The project promoters of the Nordic-Baltic Hydrogen Corridor (NBHC), Finland's "Gasgrid vetyverkot Oy", Estonia's "Elering", Latvia's "Conexus Baltic Grid", Lithuania's "Amber Grid", Poland's "GAZ-SYSTEM", Germany's "ONTRAS Gastransport", and the European Climate, Infrastructure and Environment Executive Agency (CINEA), signed an agreement for the European Union's (EU) financial support for the Nordic-Baltic Hydrogen Corridor. A maximum amount of EUR 6.8 million will be earmarked for the feasibility study phase of the Nordic-Baltic Hydrogen Corridor. Amber Grid submitted a 10-year network development plan for the gas transmission system operator to NERC following a public consultation in June. Key elements of the plan include: upgrading existing gas infrastructure, ensuring security, increasing resilience to crisis situations, developing alternative energy sources, integrating renewable energy, developing a hydrogen transport network, synergies between the gas and electricity sectors, and reducing greenhouse gas (GHG) emissions.

08

AUGUST

13th August. NERC set the weighted average cost of capital (WACC) to be applied to Amber Grid from 2026. WACC will decrease from 5.63 in 2025 to 5.58% in 2026.

09

SEPTEMBER

10th September, Amber Grid and MR Group signed a contract for the installation of a new electric compressor at the Jauniūnai Compressor Station. The contract is valued at EUR 30.9 million (EUR 37.4 million including VAT). The works will last 42 months and will begin in September this year.

Under the agreement, design and construction works will be carried out, including the installation of an integrated electric gas compressor with a capacity of around 5 MW, along with all associated equipment. A new high-voltage power line will also be built from Širvintos to the Jauniūnai Compressor Station to ensure the required electrical capacity.

22nd September. A new Guarantees of Origin registry for renewable energy sources was launched. The service will be provided by Grexel Systems Oy, a Finish company. Amber Grid selected Grexel Systems Oy as a new service provider for the Guarantees of Origin registry for renewable energy sources. The new registry was launched on 22 September.

10

OCTOBER

13th October. The European Energy Exchange AG (EEX) and the Lithuanian gas transmission system operator Amber Grid completed the strategic process started back in 2023 – the transfer of shares of GET Baltic to the partner that won the international public tender. In the first phase, in 2023, after approval from Amber Grid's Board and General Meeting of Shareholders, and having evaluated GET Baltic's financial results, 66% of the shares were sold for EUR 6.5 million. The current transaction for the remaining 34% of shares has been valued at EUR 3.8 million.

11

NOVEMBER

1st November. The Nordic-Baltic Hydrogen Corridor was included by the European Commission in the second list of Projects of Common Interest (PCI) and Projects of Mutual Interest (PMI) of the European Union.

12

DECEMBER

19th December. The Association of Issuing Bodies (AIB) officially confirmed the connection of the gas transmission system operator Amber Grid to the AIB Hub, which enables the exchange of guarantees of origin for gas produced from renewable energy sources between member states. From now on, guarantees of origin issued in Lithuania and recognized internationally under the European Energy Certificate System (EECS) will be transferred via the AIB hub. Membership in the AIB Gas Scheme Group enables the exchange of guarantees of origin between registries of different EU countries, thereby ensuring conditions for biomethane market participants to trade renewable gas across the entire European Union.

22nd December. Amber Grid concluded a tripartite debt transfer agreement with UAB EPSO-G and the Nordic Investment Bank. Under the agreement, UAB EPSO-G assumes a loan of EUR 10.9 million granted under the loan agreement concluded on August 19, 2015, between AB Amber Grid and NIB, which was intended to finance the Klaipėda–Kiemėnai gas pipeline capacity expansion project (construction of the Klaipėda–Kuršėnai gas pipeline). In addition, AB Amber Grid and UAB EPSO-G concluded an internal loan agreement under the same terms as those set out in the original agreement.

25th December. The Ministry of Energy of the Republic of Lithuania launched an informal public consultation on the draft Law on Hydrogen.

29th December. Amber Grid signed an agreement on the natural gas transit to the Kaliningrad Region through the Republic of Lithuania. The gas transit is organized based on international agreements, the EU regulations and the Law on Natural Gas of the Republic of Lithuania.

The new transit service conditions are set for five years – until 31st December 2030. The service prices are set by the National Energy Regulatory Council, with the permissible revenue level for 2026 set at about EUR 30 million. The current transit agreement was valid from 1st January 2016 to 31 December 2025.

Events after the reporting period

01

JANUARY

7th January, a public consultation was launched on a 10-year joint development scenario for electricity, gas, and hydrogen networks. It was closed on January 21. The inputs from the market participants are currently being assessed. The 10-year joint development scenario for electricity, gas, and hydrogen networks will form an integral part of the new ten-year network development plan (2026–2035) to be prepared in 2026.

02

FEBRUARY

19th February, the Amber Gas Corridor online seminar took place, presenting a regional natural gas transmission initiative aimed at making more efficient use of the existing gas transmission infrastructure and regional interconnections. The initiative links the gas markets of Finland and the Baltic States with Poland, creating a reliable basis for bidirectional gas transportation between Finland, the Baltic States, Poland, and Central and Eastern Europe. The initiative is jointly developed by Amber Grid (Lithuania), KN Energies (Lithuania), Conexus Baltic Grid (Latvia), Elering (Estonia), Gasgrid Finland (Finland) and GAZ-SYSTEM (Poland).

On the 25th the tripartite agreement with UAB EPSO-G and the Nordic Investment Bank regarding the transfer of debt entered into force. Together with this agreement, the internal loan agreement concluded with EPSO-G on December 22, 2025, also entered into force.

03

Operational strategy and planned investments



3.1. Vision, mission, obligations and priorities

3.2. Operating and financial objectives

3.3. 10-year network development plan

3. Operational strategy and planned investments

3.1. Vision, mission, obligations, priorities

In early 2025, Amber Grid’s updated Strategy to 2035 was approved, where the Company together with the EPSO-G Group companies highlights the Group’s common mission to accelerate energy independence and increase system reliability, and its vision to enable green transformation simultaneously safeguarding energy and national security interests. To achieve objectives, the main directions have been outlined: to build the infrastructure of the future, to ensure reliability and security, and to be vital and skilled strategic partner. To deliver strategic changes and objectives, we will rely on a range of empowerment tools: financing, innovation and digitalisation, partnerships, asset development and management, improvement of supply chains and procurement. In this journey of change, Amber Grid sees itself as a trusted partner, building the hydrogen network, the carbon ecosystem, continuing to actively extend green gas connections to the transmission network, developing markets and strengthening relationships with existing and future customers.



We exist

OUR PURPOSE

To power a green and confident future in an everchanging world



We seek

OUR VISION

To enable green transformation simultaneously safeguarding energy and national security interests



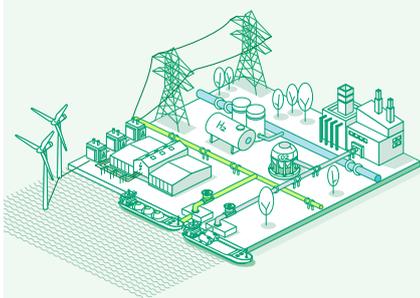
Our action now

OUR MISSION

To accelerate energy independence and enhance system security

Our commitments and lines of business

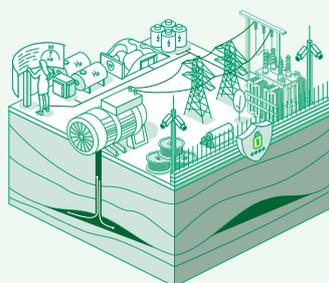
Driver of tomorrow’s infrastructure



1

We see the energy transition as a **fundamental change**. Our goal is to **build the infrastructure** upon which the **net-zero energy system** will be based

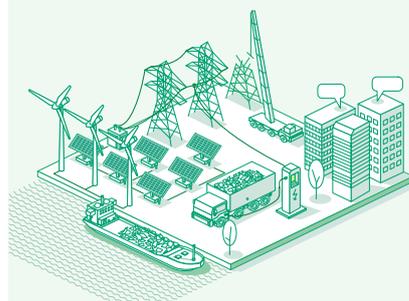
Provider of security and reliability



2

We aim to **enhance security and reliability** within and beyond the energy sector, strengthening **system flexibility and national security**. Our work is essential for a reliable future.

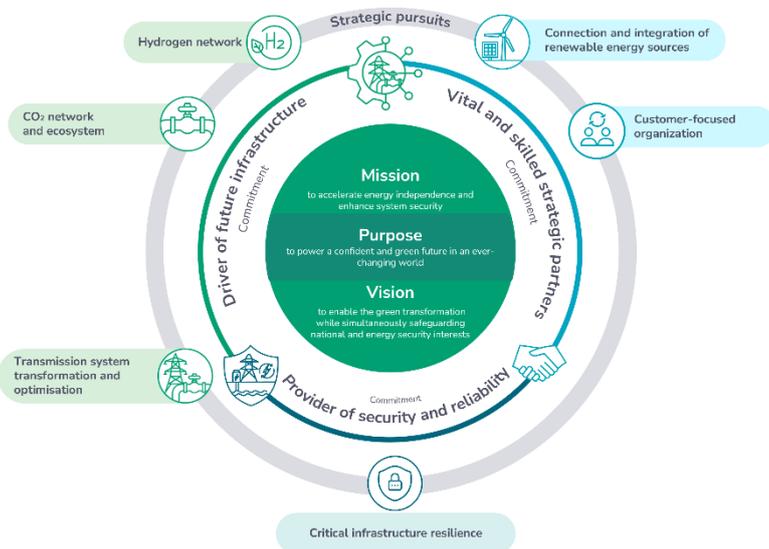
Vital strategic partner



3

Energy **transition** requires a **close cooperation** of various industry peers, investors and governments. Our goal is to be a **vital partner** in developing low-carbon infrastructure and markets.

Our strategic commitments consist of expanding our current core activities and developing new ones. Their interconnections are reflected in the strategy structure.



Describing 2035 success: value proposition for stakeholders

1 Society
Thrives in a sustainable economy

- 50%**
GHG gas emission (Scope 1 and 2) reduction by 2030, reaching net-zero by 2050
- Ensured safety of people**
0 accidents for those living near gas infrastructure

2 Clients
Experience seamless and high-quality services

- ≥ 80 points**
Global Customer Satisfaction Index (GCSI) as a leading companies rating scores
- 0 unplanned gas interruptions**
Uninterrupted gas transmission and fast fault recovery

3 Our people
Are empowered

- Safe and positive workspace and culture**
0 severe and fatal accidents for employees and/or contractors
- ≥70%**
Employee engagement rate maintained
- Top Employer certificate**

4 Founders and investors
Unlock new possibilities and reap the rewards

- ≥84 M EUR**
Group's adj. EBITDA 2035
- 90–110%**
Execution of the CAPEX plan
- High single digit**
Average adj. ROE

5 Partners
Closely collaborate for success

- ~1.4 TWh**
Of RES gas injected into the gas grid in 2035 (0.13 TWh in 2024)
- ≥26 TWh / year**
Enhanced international transmission capacity for H₂ by 2035
- ≥1.6 Mt CO₂**
Enhanced international transmission capacity for CO₂ by 2035

Below is an overview of the implementation of the Company’s Strategy to 2035 set for 2025.

In implementing our mission and pursuing our vision, we highlight three fundamental commitments, which we refer to as key business directions for implementing strategic changes. We have also supplemented these directions with the commitment of enabling sustainable and effective progress with the aim of implementing the Strategy.

The key directions were used as the basis for defining objectives, measures and strategic performance indicators within a short-term horizon of three years.

Implementation of the mission, pursuit of the vision and all activities of the Company are based on the fundamental human and professional values: we are open, responsible and reliable.

Map of strategic directions, goals and key indicators to 2035

	Driver of tomorrow’s infrastructure	Provider of security and reliability	Vital strategic partner	Architects of sustainable and efficient progress
Strategic direction and ambition	To build the infrastructure upon which the future of energy will be based	To enhance security and reliability within and beyond the energy sector, strengthening system flexibility and national security	Be a vital partner in developing low-carbon infrastructure and markets	Create sustainable and efficient progress through our actions, fostering financial stability, sustainable performance and continuous improvement
Strategic objectives	<ul style="list-style-type: none"> Optimise transmission networks, considering growing gas consumption needs Develop hydrogen activities Develop CO₂ activities 	<ul style="list-style-type: none"> Ensure resilient energy system 	<ul style="list-style-type: none"> Ensure RES and cross-sector integration Create a customer-oriented organisation 	<ul style="list-style-type: none"> Operate with sustainably and responsibly in mind Effectively manage finances and resources Build progressive business environment Build a unified, sought-after organisation
Strategic objective KPIs and target values	<ul style="list-style-type: none"> Developed H₂ transmission network with capacity of 26 TWh/year Developed CO₂ transmission network with capacity of 1.6 Mt/year 	<ul style="list-style-type: none"> Number of unplanned interruptions due to operator’s fault Duration of unplanned interruptions due to operator’s fault, hrs and mins 	<ul style="list-style-type: none"> 1.4 TWh of gas fed into the gas transmission network from renewable energy sources Customer satisfaction indicator (GCSI) ≥ 80 	<ul style="list-style-type: none"> Environmental impact of the Company’s activities reduced to the extent specified Average adjusted ROE ≥8% 90-110% CAPEX achievement 0 severe and fatal accidents during the operation, reconstruction of existing and construction of new gas transmission networks; 0 accidents for those living near gas infrastructure Engagement of the Group employees ≥70 Top Employer certificate
Key results (targets) to 2035	<ul style="list-style-type: none"> Built the first green H₂ transport network in the region Built the first network for transporting CO₂ captured by cement producers in Lithuania and Latvia via pipelines Transmission network optimised, considering gas consumption needs and security 	<ul style="list-style-type: none"> Implemented measures ensuring national security Ensured secure and reliable gas transmission 	<ul style="list-style-type: none"> Volume of RES achieved as specified in national documentation Ensured positive customer experience 	<ul style="list-style-type: none"> Developed GHG emission reduction scenarios and implemented measures to achieve 50% Scope 1 and 2 GHG reduction targets by 2030 Implemented measures ensuring occupational safety Empowered employees to work smart by increasing effectiveness and automation of the processes, and innovating Implemented financial measures to ensure the

				Company's financial stability, sustainable return on capital, and solid credit rating <ul style="list-style-type: none"> Developed and implemented a program for improving employee image and competency-based leadership
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In pursuit of its goals, Amber Grid continuously evaluates the implementation and progress of the Strategy. A detailed information on the Company's strategy is available on the Company's website at **Strategy | Amber Grid**.

The following represents the status of implementation of the strategy set for 2025.

Implementation of the Company's strategy

Strategic direction	Strategic objectives	Strategic objective KPIs and target values	Planned for 2025	Actual progress in 2025
Driver of tomorrow's infrastructure	Development of hydrogen activities	Developed H ₂ transmission network capacity, TWh/year	Implementation of preparatory work (actions) ≥90%	
	Development of CO ₂ activities	Developed CO ₂ transmission network capacity, Mt/year		
Provider of security and reliability	Ensure resilient energy system	Number of unplanned interruptions due to operator's fault	0	0
		Duration of unplanned interruptions due to operator's fault, hrs and mins		
Reliable and skilled strategic partner	Ensure RES and cross-sector integration	Volume of gas from renewable energy sources fed into the gas network, TWh	0.5	0.277
	To create a customer-oriented organisation	Customer satisfaction rating among the companies of the leading standard (GCSI) (score)	≥80	86
	Enabled functioning of new markets	Connection of the Lithuanian Register of Guarantees of Origin of gas produced from RES to European systems	Preparatory work completed 100%	95% delivery of planned work
Architects of sustainable and efficient progress	Effective finance and resource management	Adjusted ROE, %	5.4	6.0
		Adjusted EBITDA, EUR million	27.2	27.8
		Actual CapEx (EUR/year) / planned CapEx (EUR/year), %	90–110%	109%
	Operate with sustainably and responsibly in mind	Reduction of GHG emissions from activities compared to 2019, %	10%	51 %
		Number of severe and fatal accidents (including contractors whose work is used in group facilities for operation, reconstruction of existing and construction of new gas transmission networks)	0	0
	Build a unified, sought-after organisation	Engagement of the Company's employees	≥70%	75%
Top Employer certificate		Implementation of preparatory work (actions) ≥90%		

No precise strategic measurement indicators are set for strategic objectives "Gas network optimisation, considering gas consumption needs and security", "Strengthen national security", and "Develop progressive business environment", as the nature of their activities leaves no choice in setting long-term, measurable, comprehensive indicators, therefore they are addressed through the specific measures.

3.2. Operating and financial objectives

The Board of Amber Grid set and approved the annual operating objectives to be implemented by the Company in 2025. Both financial and non-financial objectives set for the Company and the objectives of the Company's CEO are identical. The Company's CEO reports to the Board for the achievement of the set objectives.

The table below presents the status on the implementation of the Company's objectives set for 2025.

Annual objective	Target values for the indicator	Weight of the goal	Assessment of goal achievement
Development of hydrogen and CO ₂ activities.	<ol style="list-style-type: none"> 1) The <i>Nordic-Baltic Hydrogen Corridor</i> project is developed using the EU funding 2) The development of CO₂ pipeline transportation service is subject to further analysis 	21%	17.4%
Gas network optimisation, considering gas consumption needs and security	<ol style="list-style-type: none"> 1) Projects for modernisation of the Jauniūnai and Panevėžys gas compressor stations are delivered in timely manner and within the planned scope 2) Transmission system assets are subject to analysis, a plan is developed for the safe gas infrastructure optimization 	14%	13.2%
Ensuring the resilience of the energy system	<ol style="list-style-type: none"> 1) The measures for the energy infrastructure resilience are implemented within the planned scope 2) The plan of long-term measures for ensuring the security of gas pipelines is implemented within the planned time and scope 3) Rebuilding critical gas pipelines 4) Implementing investment programme 	35%	28.8%
Enabling functioning of new markets	Connection of the Lithuanian Register of Guarantees of Origin of gas produced from RES to European schemes	5%	4.8%
Effective finance and resource management	Adj. ROE ≥ 5.4% Adj. EBITDA > EUR 27.2 million OPEX ≤ EUR 35.8 million	12%	11.7%
Sustainable and responsible business management	Realisation of GHG reduction targets and further comprehensive scenario modelling to achieve net zero	5%	5%
Building a unified, sought-after organisation	<ol style="list-style-type: none"> 1) Development of the Group leadership and general competency programmes in cooperation with the Group 2) Implementation of the engineering competency-building programme 	8%	7.6%

The objectives set for the Company are identical to those of the Company's CEO. The Board of the Company annually assesses the progress achieved in respect of the implementation of the objectives. The result is used as one of the components when awarding annual financial incentive to the Company's CEO and other Company's employees.

Objectives are available on Amber Grid's website at [Amber Grid performance objectives](#).

Based on the Board's assessment, the objectives set for the Company for 2025 were achieved at **88.5%**

3.3. 10-year network development plan

In January 2026, Amber Grid updated its strategy, which outlines significant investments in the renewal of existing infrastructure and the development of new infrastructure. To properly plan infrastructure needs and the investments required to meet them, and following best practices, in 2026 for the first time Litgrid and Amber Grid carried out a public consultation on a joint development scenario for electricity, gas, and hydrogen networks. During the consultation, planned investment projects and their preliminary values were also presented. The proposals and comments received from market participants are currently being analysed and coordinated with stakeholders; the assessment will be made public. Based on the agreed development scenario for electricity, gas, and hydrogen networks, the transmission system operators' network development plans will be updated, with publication planned for early in the second half of 2026. Below are the network development plans prepared in 2024 and valid in 2025, which are currently being updated.

In accordance with the provisions of the Natural Gas Act, Amber Grid prepares a ten-year transmission system operator network development plan every two years. The currently valid plan is the ten-year (2024–2033) network development plan prepared by Amber Grid in 2024, which was approved by the National Energy Regulatory Council (VERT) in October 2024. The main aspects of Amber Grid's ten-year network development plan include:

- modernisation of existing gas infrastructure elements, ensuring security and increasing resilience to crisis situations,
- development of alternative energy sources and integration of renewable energy,

- creation of a hydrogen transmission network and synergy between the gas and electricity sectors,
- reduction of greenhouse gas (GHG) emissions.

One of the commitments highlighted in the plan is the modernisation of the national gas transmission infrastructure, taking into account Lithuania's energy independence goals, European energy and decarbonisation policies, and the needs of green energy project developers and market participants. Considerable attention is given to the integration and diversification of renewable energy sources (RES), including biomethane and green hydrogen. When preparing the integrated hydrogen network plan within the ten-year network development plan, the needs of potential customers were taken into account. Possible network solutions were coordinated with the electricity transmission system operator Litgrid and its network development plans.

Key investment projects implemented by the Company in 2025 were as follows:

A project to rebuild sections of the main gas pipeline (due to non-compliance with local class requirements) has been launched and will continue in 2026. During the project, separate sections of the gas pipeline are planned to be rebuilt in several locations in Lithuania to meet the requirements for higher area classes, thereby improving their safety. The value of the project is more than EUR 10 million;

The project for the reconstruction of the Jauniūnai gas compressor station (GCS), which will continue in 2026. Following the project, the reliability of GCS will be optimized by installing an electrically powered compressor. The value of the project is EUR 30.9 million;

The reconstruction of the Elektrėnai gas distribution station (DSS). The project will continue in 2026 and envisages the renovation of the GDS by installing new technological equipment. The value of the project is EUR 2.1 million;

The project preparatory work for the reconstruction of the Panevėžys gas compressor station has been initiated. During the project, new compressor units are planned to be installed to comply with environmental requirements.

04

Our performance results



- 4.1. Transmission system
- 4.2. Maintenance, reconstruction and modernisation
- 4.3. Market for the services provided
- 4.4. Customers
- 4.5. Services provided
- 4.6. Green gas activities
- 4.7. Research & development activities
- 4.8. Business plans and prospects
- 4.9. Financial report

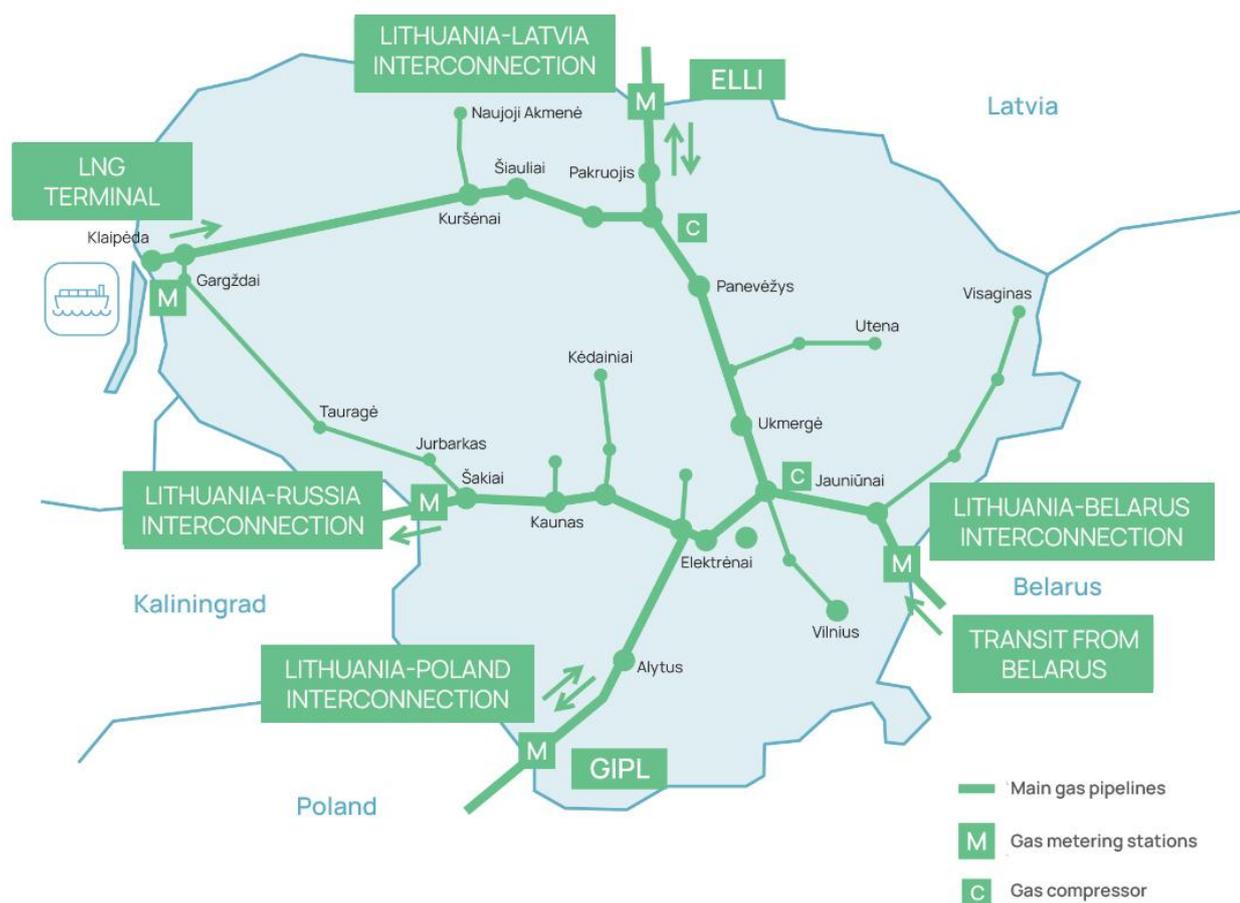
4. Our performance results

4.1. Transmission system

The natural gas transmission system consists of the gas transmission pipelines, gas compressor stations, gas distribution stations, gas metering stations, anti-corrosion equipment for protection of pipelines, data transmission and communication systems, and other facilities belonging to the transmission system. The Lithuanian gas transmission system is connected to the gas transmission systems of the Republic of Poland, the Republic of Latvia, the Republic of Belarus, the Kaliningrad Region of the Russian Federation, and the Klaipėda LNG terminal.

The Company operates 64 gas distribution stations (GDS), 4 gas metering stations (GMS), 2 gas compressor stations (GCS), and 5 connections with the customer biogas metering stations (BGMS). The length of the operated pipelines is 2288 km, and the diameter ranges between 100 and 1220 mm. The design pressure in the larger part of the transmission system is 54 bar.

Lithuanian gas transmission system



4.2. Maintenance, reconstruction and modernisation

Maintenance of the main gas pipelines is regulated under the legal acts and is carried out strictly in compliance with the requirements set forth therein. Maintenance and repair works are conducted continuously to ensure a reliable and safe transmission system.

127 km of the gas transmission pipelines were inspected by way of internal diagnostics: Pabradė - Visaginas and a branch to Vandžiogala and Kėdainiai GDS. 52 km of the pipeline Ivacevičiai-Vilnius-Ryga with internal welding rings were inspected for patency by way of internal diagnostics.

Contactless diagnostics was used to inspect 40 km of the following pipelines: branches to Elektrėnai, Grigiškės, Butrimonys, Zapyškiai, Prienai, Panevėžys, Gargždai GDS and the connection between Ivacevičiai-Vilnius-Ryga and Vilnius-Kaunas.

515 km of pipelines were inspected for the integrity of the protective coating and the effectiveness of the cathodic protection.

During 2025, the Company carried out the following reconstruction and modernisation works:

- replacement of insertions of main gas transmission pipelines, taking into account the technical condition of main gas transmission pipelines and the results of diagnostics;

- project for optimising the capacity of the Jauniūnai gas compressor station;
- replacement of shut-off devices and connection to the remote control system in the branches to: Butrimonys GDS, Ukmergė GDS, Radviliškis GDS; in the main gas pipelines: Šiauliai-Klaipėda, Vilnius-Kaunas and to the Kaliningrad Region;
- project for reconstructing Elektrėnai GDS;
- reconstruction of the dispatcher building;
- upgrading of control metering stations;
- upgrading and developing the Asset Management System;
- upgrading special purpose vehicle and special machinery fleet.

4.3. Market for the services provided

Amber Grid provides natural gas transmission services to the system users, other operators, biogas producers and gas market participants in the territory of Lithuania: it transmits gas to the domestic consumers, also transports natural gas to Latvia, Poland and transit to the Kaliningrad Region of the Russian Federation. Gas is supplied to the system via the LNG terminal in Klaipėda and gas entry points from Latvia, Poland and for the transit needs from Belarus. As of the summer 2023, the biomethane produced in Lithuania has also been injected into the transmission system. With effect from 1 April 2022, gas supply for domestic consumption was discontinued from Russia.

Amber Grid is also responsible for balancing gas flows in the transmission system and administering the Klaipėda LNG terminal, its infrastructure, installation of the interconnector and the funds (LNGT funds) to compensate for fixed operating costs and the nominated supplier's reasonable costs of supplying the necessary volume of liquefied natural gas. The Company actively works with its partners to create conditions for efficient functioning of the natural gas market by increasing the competitiveness and liquidity of the gas market and by ensuring attractive conditions for customers to operate in the natural gas market.

Amber Grid administers the National Register of Guarantees of Origin for gas produced from renewable energy sources, i.e. fulfils the following functions: issuance, transfer and cancellation of the guarantees of origin, supervision and monitoring of the use of the guarantees of origin, and recognition of the guarantees of origin issued in other states as acceptable in Lithuania. Green gas is produced from biomass and other RES. The guarantee of origin is granted per unit of energy: one megawatt-hour (MWh) supplied to the gas transmission and distribution network. The guarantee of origin system enables identification, registration and monitoring of the biomethane produced, while the end-users of such fuel can be assured that the gas they use is produced from renewable energy sources.

4.4. Customers

The customers of Amber Grid's services of natural gas transmission via gas transmission pipelines and balancing of natural gas flows in the transmission system are large Lithuanian electricity and district heating companies, industrial and medium-size businesses in Lithuania, energy and natural gas supply companies in the Baltic and third countries that receive natural gas transmission services.

At the end of 2022 and H1 2023, the Company received a number of requests from biomethane producers for the issuance of preliminary connection conditions, following the adoption of amendments to Article 32 of the Law of the Republic of Lithuania on Renewable Energy Resources in 2022, which entered into force on 1 November 2022, which provide that a biogas producer, after coordinating with the gas system operator, shall have the right to design and/or construct / install and perform works in the gas system on behalf of the gas system operator, according to the procedure, terms and conditions set out in the gas system service agreement for connection of the biogas production facilities to the gas system.

The new legal framework has significantly boosted the initiatives of biogas producers to connect to Amber Grid's gas transmission system. More information thereon is available in the Section "Green gas activities".

4.5. Services provided

The Company provides the following services to system users, other operators and gas market participants:

- gas transmission in the territory of Lithuania;
- balancing gas flows in the transmission system;
- administration of LNGT funds;
- administering the register of guarantees of origin for gas produced from renewable energy sources.
- connecting new consumers, including biomethane producers, to the transmission system.

4.5.1. Gas transmission

Gas transmission quantities

In 2025, 30540 GWh of natural gas was injected into Amber Grid's gas transmission system from Klaipėda LNG terminal for consumers of Lithuania and EU Member States; 2552 GWh was transported from Latvia to Lithuania and 565 GWh – from Poland

to Lithuania. In 2025, 277 GWh of biomethane had been produced in Lithuania and injected into the transmission system in Lithuania. Klaipėda LNG terminal supplied 90.0% of the total required quantity of gas for consumers of Lithuania and EU Member States.

In 2025, 15901 GWh of gas was transported through the domestic exit point for the gas consumers in Lithuania. Compared to 16947 GWh of gas transported during 2024, gas transmission quantities decreased by 6.2%.

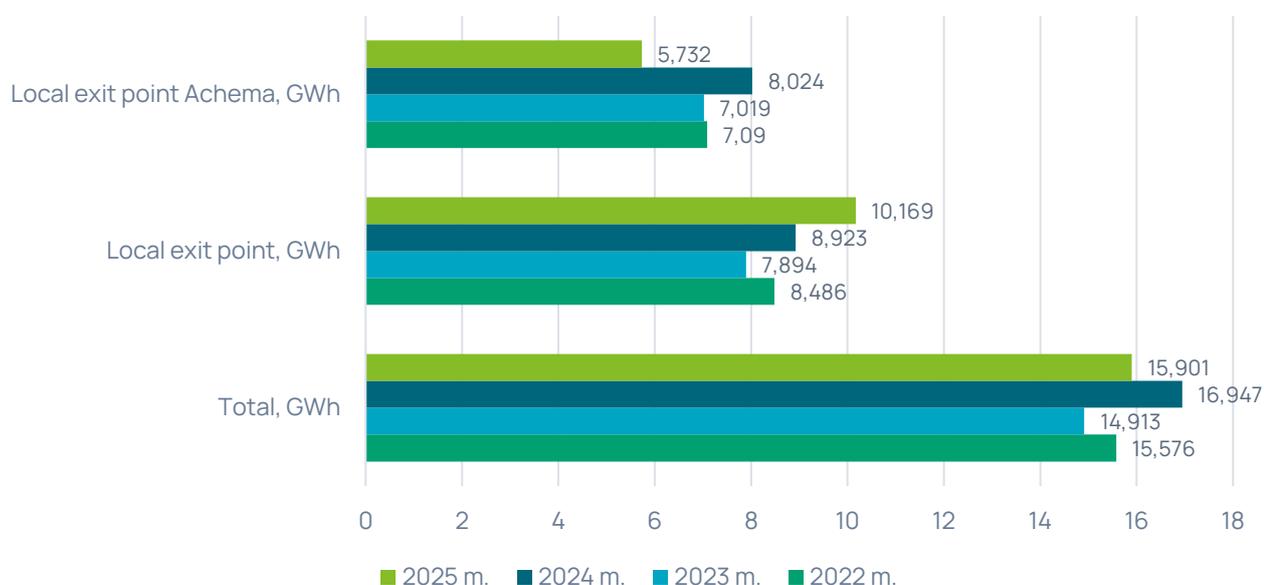
In 2025, 12,718 GWh of gas was transported from the Lithuanian transmission system to Latvia through the Kiemėnai gas metering station, i.e. 31.3% more than in 2024 (9,688 GWh).

In 2025, 4,969 GWh of gas was transported from Lithuania to Poland via Santaka gas metering station, i.e. 95.0% more than in 2024 (2,548 GWh).

During the reporting period, 19727 GWh of gas was transported to the Kaliningrad Region of the Russian Federation (2024: 26125 GWh).

As at 31 December 2025, the Company had 97 agreements on natural gas transmission services with the transmission system users (gas consumers, gas distribution system operators, importers, gas suppliers supplying gas up to the consumer systems), of which 73 system users used the transmission capacity during the reporting period. The Company had 1 natural gas balancing agreement with the market participants trading natural gas via the virtual trading point, but not transporting it via the transmission system.

Gas volumes transported at the domestic exit point by transmission system user in Lithuania



Regulation of prices for the gas transmission system operator’s services

The network code on harmonised transmission tariff structures for gas (TAR NC) set by the European Commission Regulation (EU) 2017/460 of 16 March 2017 has been applied to pricing of transmission services since 2020.

Regulation of gas transmission prices is conducted by NERC through setting the revenue cap, the pricing methodology, and through approval of the specific prices set by the Company. The revenue caps for regulated activities can be annually adjusted by the decision of NERC in accordance with the procedure established in the Methodology for determining revenue from and prices for regulated natural gas transmission activities.

A 5-year regulatory period, which started in 2024, will end at the end of 2028. The revenue cap set by NERC for the regulated activity for 2025 was EUR 63.83 million (by 4.75% lower than the one set for 2024, which was EUR 67.01 million). In April 2025, NERC set a revenue cap of 82.95 million euros for the gas transmission system operator Amber Grid for the year 2026, which is 30% higher than in 2025. Compared to 2025, regulated costs in all categories will increase by a total of ~10% in 2026 due to inflation and investments made. The final part of compensation to the Polish gas transmission system operator, which increases costs by ~3%, has also been included for the implemented Lithuania-Poland interconnection project of common interest. The estimated deviations in revenue, costs and return on investment for previous periods are another significant reason for the increase in the revenue ceiling (~17%).

At the beginning of 2025, when setting the transmission tariffs for 2025, 64.4 TWh of natural gas was forecast to be transported through the Lithuanian gas transmission system, which is 1.4% less than the estimate for 2025 (65.3 TWh) and 16.5% more than the actual transport in 2025 (55.3 TWh). It is forecasted that Lithuanian gas consumption will decrease by 1.1% next year: from 16.9 TWh, which were estimated when setting prices for 2025, to 16.7 TWh calculated for 2026.

The prices were set taking into account the regulatory revenue cap approved by NERC and the approved changes to the methodology applicable to the calculation of transmission service prices from 2026. The average price of gas transmission services for Lithuanian consumers in 2026 will be 1.52 EUR/MWh. This is 5% less than the gas transmission price valid in 2025, which was 1.60 EUR/MWh. In 2025, at all gas entry points, including the Klaipėda entry point, transmission service prices were standardised and aligned with the entry prices applied in the neighbouring tariff zone of Latvia, Estonia and Finland. The same pricing approach is maintained in 2026. In addition, as of 2026, a 100% discount will apply at the connection point of the Lithuanian transmission system with biogas production facilities.

Detailed information on the prices of gas transmission services is available on Amber Grid's website.

4.5.2. Balancing of gas flows in the transmission system

Amber Grid ensures the balancing of natural gas flows in the transmission system. By following the Rules for Natural Gas Transmission System Balancing, the Company purchases balancing gas from a gas market participant when there occurs gas surplus in the transmission system, and the Company sells balancing gas to a gas market participant when there occurs gas shortage in the transmission system.

The Rules for Balancing the Natural Gas Transmission System enforced on 1 March 2022 stipulate that the virtual trading point cannot trade in day-ahead products, which has increased the number of market participants causing imbalances. The Transmission system operator calculates a neutrality fee for each market participant to ensure financial neutrality for the reporting period. The amendments have been drafted in accordance with the provisions of Commission Regulation (EU) No 312/2014 of 26 March 2014 establishing a Network Code on Gas Balancing of Transmission Networks.

During 2025, due to the imbalance caused by the system users, the Company bought 633.1 GWh and sold 478.4 GWh of gas.

Following the amendments to Amber Grid's Rules for Balancing the Natural Gas Transmission System rules enforced on 1 March 2022, Amber Grid calculates a neutrality fee for market participants to ensure financial neutrality. In 2025, EUR 4.7 million was refunded to system users and EUR 0.1 million was collected from them.

Transmission of gas by transit from/to third countries causes mixing of physical gas flows in the transmission system, which in turn results in a difference between the gross calorific value of gas at the entry and exit points of the gas transmission system. In 2025, the gas transmission to the Kaliningrad Region resulted in a difference of 225.1 GWh at the entry and exit points of the transmission system, which was bought from the Company through the settlement of the third country to third country transmission services provided.

Apart from balancing of gas flows of the system users and other gas market participants, the quantity of natural gas contained in the pipelines of the Company's transmission system fluctuates due to technical and technological characteristics of the transmission system.

4.5.3. Administration of funds intended for compensation of construction costs and fixed operating costs of the LNG terminal, its infrastructure and the connector, and for compensation of reasonable costs incurred by the designated supplier.

In order to ensure compliance with the requirements of the legal acts (the Law on Liquefied Natural Gas Terminal and the supplementing legal acts), the Company collects, administers and pays out the LNGT funds to their payers in accordance with the procedure prescribed by laws. These funds are used to compensate Amber Grid for the costs of administration of the LNGT funds.

The security component set for 2025 is EUR -25.55/ MWh/ day/ year (in accordance with Resolution No O3E-1469 of NERC of 27 November 2024). It applied from 1 January to 30 June 2025. The security component set for 2025 was EUR -43.00/ MWh/ day/ year (in accordance with Resolution No O3E-791 of NERC of 29 May 2025). It applied from 1 July to 31 December 2025. Acting as the administrator of the LNGT funds and in accordance with the description of the procedure for the administration of the LNGT funds, as amended by NERC, the Company will have to repay the LNGT funds to their payers (transmission system users) in 2025.

The proportions of the allocation of LNGT funds applicable to their beneficiaries (applied in 2023 and as of 1 January 2024, respectively) and agreed with NERC, are presented in Table. Additionally, the proportions of the allocation of LNGT funds applicable to their beneficiaries and agreed with NERC, effective as of 1 January 2025, are presented in Table.

Information on the allocation of the LNGT funds collected in 2023-2025 among the beneficiaries of LNGT funds

Components	Proportion 01/01/2023- 30/06/2023	Proportion 01/07/2023- 31/12/2023	Proportion 01/01/2024- 31/12/2024	Proportion 01/01/2025- 31/12/2025*
Liquefied natural gas regasification component	0%	0%	0.000%	97.01%
Administrative cost component	0%*	0%	0.401%	-

Reasonable costs' component for supplying the necessary quantity to the LNGT	0%	100%	99.599%	2.99%
In total:	-	100%	100%	100%

* The proportion was estimated based on the information about the fund amounts provided for in Resolution No O3E-1469 of NERC of 27 January 2024.

Due to funds unpaid to the LNGT, the Company currently has one civil case pending regarding the award of LNGT funds and default interest from AB Achema.

By the decision of Kaunas Regional Court of 20 January 2022, the proceedings were suspended in respect of the claimed LNGT extra charges of EUR 4,678 thousand and late interest of EUR 55 thousand arising from the natural gas transmission service contract of 22 December 2014, as it was pending the decision of the European Commission regarding the compatibility of the LNGT extra charges, collected during the period from 1 January 2016 to 31 December 2018, with the state aid rules under the EU law. By decision of 17 March 2022, the Lithuanian Court of Appeal left the decision of Kaunas Regional Court of 20 January 2022 unchanged.

By the decision of the Kaunas Regional Court of 20 September 2022, the proceedings concerning late interest of EUR 763 thousand under the natural gas transmission service contract of 21 December 2012, as well as AB Achema's counterclaim challenging the calculation of late interest and the allocation of payments, were suspended pending a decision of the European Commission on the compatibility of LNG terminal funds during the period from 1 January 2016 to 31 December 2018, with the state aid rules under the EU law. The Company appealed this decision; however, by its ruling of 8 September 2022, the Lithuanian Court of Appeal upheld the decision of the Kaunas Regional Court. As the European Commission has not yet adopted a decision, the proceedings remain stayed.

On 8 August 2025, the Company submitted a statement to the Kaunas District Court regarding the increase of the claim (hereinafter the "Statement"), asking the court to award EUR 763,119.55 of default interest from Achema AB in favour of the Company based on the natural gas transmission service contract dated 21 December 2012, EUR 7,510,828.66 of LNG extra charges and EUR 640,180.35 of default interest under the natural gas transmission service contract dated 22 December 2014. The issue of acceptance of the Company's Statement will be decided by the Kaunas District Court after resuming the proceedings.

4.6. Green gas activities

Guidelines for hydrogen development in Lithuania in 2024-2050

The Guidelines for Hydrogen Development in Lithuania 2024-2050 (hereinafter – H2 Guidelines) were approved by Order No 1-81 of the Minister of Energy of the Republic of Lithuania of 26 April 2024. The H2 Guidelines set out a vision for hydrogen development in Lithuania, defining strategic directions and stages of hydrogen development, the business environment and challenges. The H2 Guidelines document identifies the hydrogen network from Finland to Germany as one of the main hydrogen transport projects, which will run through Lithuania and will enable the export or import of hydrogen from other EU countries. The implementation of this project will allow Lithuania to benefit from underground hydrogen storage facilities planned in other Member States. Hydrogen blending in the natural gas network is identified in the H2 Guidelines as a transitional measure to stimulate the emergence of a green hydrogen market and to create the first hydrogen transport capacities. In order to exploit the potential of green hydrogen and its derivatives in the Lithuanian economy and export markets, at least one hydrogen valley is planned to be established in the first stage, later increasing this number to two. According to the H2 Guidelines, the installation of a 1.3 GW electrolysis plant in Lithuania would produce 129,000 tonnes of green hydrogen per year from 2030. Taking into account Lithuania's GHG reduction targets and its international commitments, it is estimated that the demand for green hydrogen in Lithuania could reach 110,000 tonnes per year in 2030. In addition, around 33,000 tonnes could be available for export.

On 27 June 2024, the Seimas of the Republic of Lithuania approved the National Energy Independence Strategy, designed to implement fundamental changes in the energy sector, ensuring that the amount of energy produced in Lithuania matches the amount consumed and that the energy sector becomes completely climate-neutral by 2050.

In order to contribute more significantly to the promotion of hydrogen and Power-to-Gas technologies at local and regional level, the Company further participates in the Lithuanian Hydrogen Platform established by the Ministry of Energy, and is a member of the European Clean Hydrogen Alliance and the Lithuanian Hydrogen Energy Association. The Company has continued to participate in the European Hydrogen Backbone initiative, which brings together more than 30 transmission system operators from across Europe to develop a vision, analyse alternatives, and draw up implementation plans for a nationwide interconnected hydrogen transport/storage infrastructure.

Nordic-Baltic Hydrogen Corridor project

On 1 July 2025, the project promoters of the Nordic-Baltic Hydrogen Corridor (NBHC), Finland's "Gasgrid vetyverkot Oy", Estonia's "Elering", Latvia's "Conexus Baltic Grid", Lithuania's "Amber Grid", Poland's "GAZ-SYSTEM", Germany's "ONTRAS Gastransport", and the European Climate, Infrastructure and Environment Executive Agency (CINEA), signed an agreement for the European Union's (EU) financial support for the Nordic-Baltic Hydrogen Corridor. A maximum amount of EUR 6.8 million is earmarked for the feasibility study phase of the Nordic-Baltic Hydrogen Corridor.

This collaboration reinforces the competitiveness of the Baltics in the hydrogen sector and confirms the project partners' commitment to both national and international hydrogen infrastructure development. The Corridor aims to support the development of clean hydrogen markets and integrate them into Europe's future energy system. The co-financing from the Connecting Europe Facility (CEF) for cross-border energy infrastructure projects under the Trans-European Networks for Energy (TEN-E) will allow NBHC project partners to conduct in-depth feasibility studies that examine the technical, economic, regulatory and environmental aspects of building a large-scale hydrogen pipeline network in the Baltic Sea region.

The NBHC represents a significant step towards building the European hydrogen backbone, a strategic vision for connecting hydrogen production and consumption across the continent. By supporting renewable hydrogen transmission, the corridor will enhance energy security, and accelerate Europe's transition to a decarbonised economy.

By 2040, the corridor is projected to transport up to 2.7 million tons (Mt) of renewable hydrogen annually between the countries. The pre-feasibility study indicated that the NBHC can be one of the first operational cross-border hydrogen pipelines in Europe. The NBHC pipeline is currently planned to be 1,200 mm in diameter, with several compressor stations and spanning approximately 2,500 km. The feasibility study phase, launched in 2025, is expected to be completed early in 2027. It will lay the groundwork for subsequent project development phases.

NBHC commissioning is expected around 2033.

- In December 2022, six gas transmission system operators, the project partners, signed a cooperation agreement on promoting the project together.
- In April 2024, the Nordic-Baltic Hydrogen Corridor was granted the status of the project of common interest (PCI) by the European Commission.
- In June 2024, the project partners completed a pre-feasibility study.
- In October 2024, transmission system operators applied for funding under the Connecting Europe Facility (CEF).
- In July 2025, the grant under CEF was allocated to the Nordic-Baltic Hydrogen Corridor.
- In December 2025, the Nordic-Baltic Hydrogen Corridor was included by the European Commission in the second list of Projects of Common Interest (PCI).



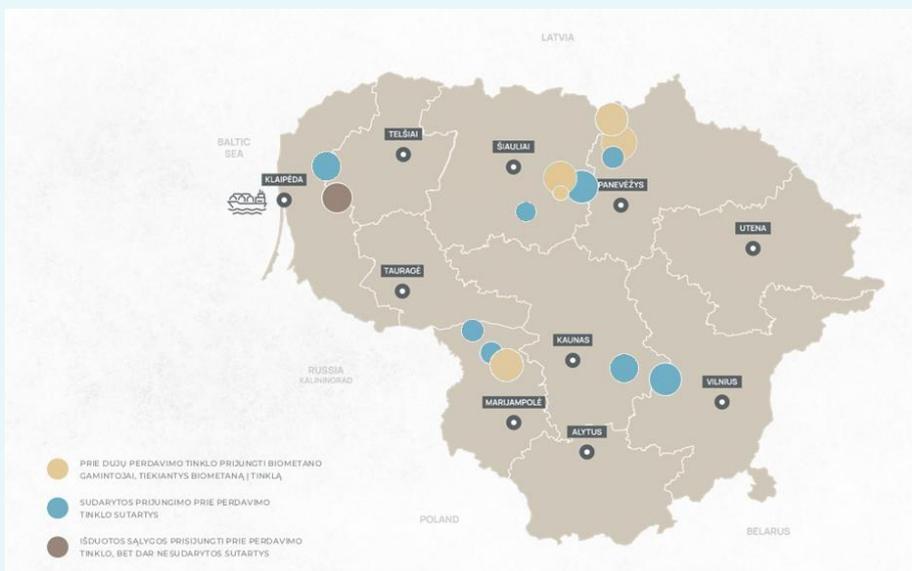
Development of biomethane production

As Lithuania’s economy grows and the country moves towards achieving the European green energy transformation goals, there is a growing need to look for possibilities to utilize renewable energy resources in the country. Recently, the emergence of biogas and biomethane in the gas system has played one of the most significant roles in this context.

In Lithuania, investments in biomethane production is also growing rapidly. Large industrial companies and new entrants are actively exploring the possibility of installing biomethane plants, connecting them to the gas transmission and distribution system, and supplying the biomethane produced to the domestic and foreign markets through the Green Gas Guarantee of Origin (GO). The integration of biomethane into the common energy system is now a key energy objective for European countries, and is therefore a significant future opportunity for the Company’s customers.

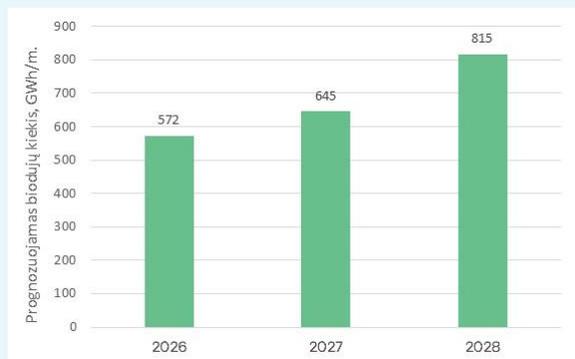
The Lithuanian government has recognised the potential of biomethane and has already implemented certain policy measures to support its development. For example, the Alternative Fuels Act sets ambitious goals for the use of renewable fuels in the transport sector, providing a strong incentive to build new biomethane plants. The government has allocated funds to support biomethane projects, demonstrating its commitment to transitioning to a more sustainable energy system.

Distribution of biomethane connection conditions by location and projected scope of biomethane inlet into the transmission network in 2026-2028, MWh/m.



At the beginning of 2025, biomethane was fed into the transmission network by biomethane plant operating in Pasvalys district and biogas plant in Radviliškis district. In May of the same year, another biomethane plant in the Pasvalys district was connected to the natural gas transmission network, with a biomethane plant in the Šakiai district connected in July. In 2025, a total of 0.258 TWh of biogas was supplied to the natural gas transmission network these biomethane plant (excluding the amount of biogas supplied to the distribution network).

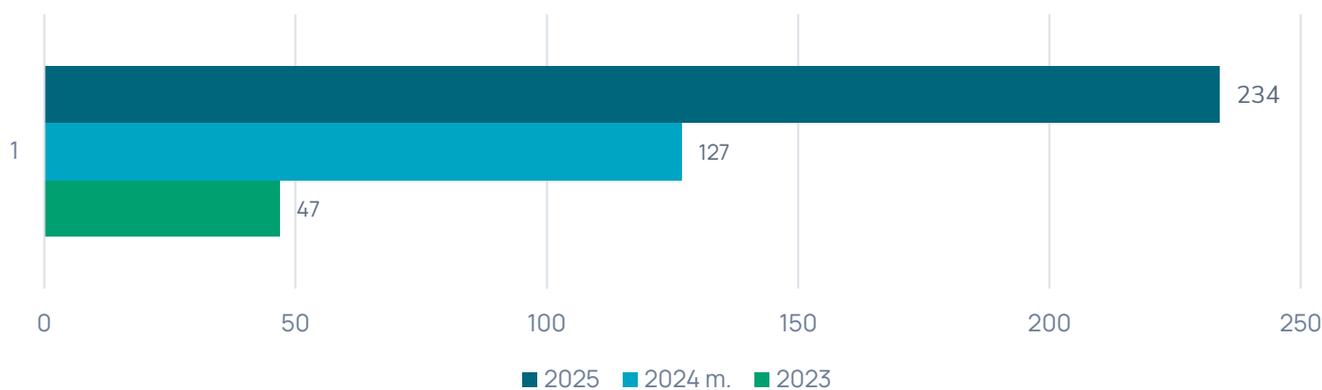
Thus, based on data from beginning of 2026, biomethane from five customers' plants is fed into the transmission system, eight customer connection contracts are being implemented, and preliminary conditions for connection issued to one customer are in force. Most of them are planning to connect their systems in 2026-2028. In 2026, the amount of biomethane to be fed into the transmission network is expected to be ~0.572 TWh/m. Later on, a steady increase in biomethane feed-in capacity is planned, based on the signed connection contracts, reaching ~0.815 TWh in 2028.



Amber Grid administers the National Register of Guarantees of Origin of green gas necessary for the accounting and traceability of the green gas injected into the transmission system.

In 2025, biomethane plants operating in Lithuania produced and injected 234 gigawatt-hours (GWh) of renewable gas into the gas transmission and distribution networks, for which guarantees of origin were issued.

Guarantees of origin issued, GWh, 2025



The system for guarantees of origin is beneficial for energy consumers who want to use renewable energy produced in Lithuania or another EU country in their activities. Amber Grid is a member of organizations uniting European issuing bodies for guarantees of origin, such as the AIB (Association of Issuing Bodies) and ERGaR (European Renewable Gas Registry). European Renewable Gas Registry.

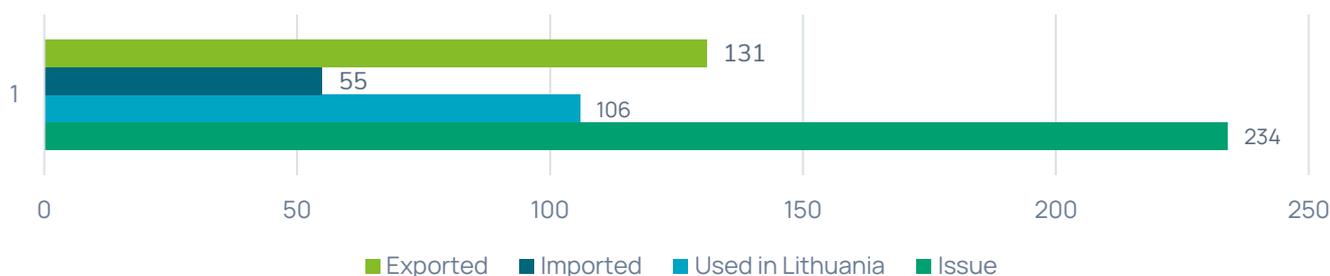
On 28 August 2025, AIB approved Amber Grid’s gas sector protocol in Lithuania, and Amber Grid became an official member of the AIB Gas Scheme Group. The protocol sets out the rules for administering guarantees of origin, enabling the issuance of internationally compliant guarantees of origin for gas produced from renewable energy sources, namely EECS guarantees of origin.

On 19 December 2025, AIB association officially confirmed the connection of the gas transmission system operator Amber Grid to the AIB Hub, which enables the exchange of guarantees of origin for gas produced from renewable energy sources between member states.

From now on, guarantees of origin issued in Lithuania and recognized internationally under the European Energy Certificate System (EECS) will be transferred via the AIB hub. Membership in the AIB Gas Scheme Group enables the exchange of guarantees of origin between registries of EU countries, connect to the AIB Hub, thereby ensuring conditions for biomethane market participants to trade renewable gas across the EU.

By joining European platforms, Amber Grid strengthens its role in the energy transition and creates more favourable conditions for cross-border trade in sustainable gas.

Transactions for guarantees of origin, GWh, 2025



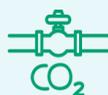
In 2025, more than 55 GWh of green gas was imported into Lithuania via the guarantees of origin system, and in 2024, more than 50 GWh. Both imported and domestically produced biomethane is used as fuel in transport, and the guarantees of origin are used in the renewable fuel unit system to cover the obligations of fuel suppliers regarding the share of renewable fuels in the final fuel mix.

4.7. Research & development activities



Northern and Baltic Hydrogen Corridor (NBHC)

In 2025, TSO's from six countries started working on more comprehensive feasibility studies across the partner countries, as well as technical and commercial cross-border studies. The results of the cross-border studies are expected to be available by the end of Q1 2027 and will form the basis for the design and construction of a pipeline from Finland to Germany.



Creation of the CO₂ capture, utilization, and storage value chain

Carbon capture, utilisation, and storage is the main instrument for reducing carbon dioxide emissions in industrial sectors where it is difficult to reduce greenhouse gas (GHG) emissions. Creating a value chain for carbon capture, utilisation, and storage is a prerequisite for achieving the EU's 2050 climate neutrality target.

CCS Baltic Consortium was formed in 2022, bringing together AB KN Energies, Lithuanian (Akmenės Cementas) and Latvian (SCHWENK) cement producers, as well as shipping companies (Larvik Shipping (Norway) and Mitsui O.S.K. Lines (Japan)). The aim of the Consortium is to build a carbon capture and storage value chain in Lithuania and Latvia for capturing CO₂ from industrial sources and transporting to the port of Klaipėda and then to disposal sites. In 2024, Amber Grid and Conexus Baltic Grid, Latvia's natural gas transmission system operator, joined the CCS Baltic Consortium as partners to assess the feasibility of installing a pipeline for CO₂ transportation via an onshore pipeline.

In 2024, the European Commission granted the CCS Baltic Consortium project the status of a Project of Common Interest (PCI), recognizing it as an important cross-border infrastructure project that makes a significant contribution to the implementation of the EU energy policy and climate objectives.

In 2025, Amber Grid continued its cooperation with the CCS Baltic Consortium: in H1 2025, a preliminary commercial and technical feasibility study commissioned by the Consortium was carried out, which, in addition to carbon dioxide reloading and storage activities, analysed various CO₂ onshore transportation alternatives: by rail, road, and pipeline. In 2026, efforts will be targeted towards legal developments necessary for the implementation of the CCS Baltic Consortium project.



Analysis of synthetic fuels

Amber Grid AB prepared an Analysis of the Possibilities for the Production, Export, and Storage of Synthetic Fuels (from Hydrogen and CO₂) in accordance with the Action Plan for the Implementation of the Hydrogen Development Guidelines in Lithuania 2025-2027 approved by Resolution No 1070 of the Government of the Republic of Lithuania of 11 December 2024.

The demand for synthetic fuels is driven by European Union regulatory policy, including RED III, ReFuelEU Aviation, FuelEU Maritime and the EU Emissions Trading System (ETS). The highest demand for synthetic fuels is forecast in the aviation, maritime transport and heavy road transport sectors, where electrification remains limited. In these sectors, e-methane, e-methanol, e-SAF, e-diesel and e-ammonia can become an important alternative to fossil fuels.

Biogenic CO₂ and green hydrogen are the major input to produce sustainable synthetic fuels. Amber Grid projects that, by 2040, Lithuania could harness 3.5 million tonnes of biogenic CO₂ each year. According to Amber Grid's survey of hydrogen market participants, Lithuania could reach a 5.9 GW green hydrogen production capacity by 2040. This creates prerequisite for the production of synthetic fuels using domestic resources.

During the analysis, synthetic fuel production in Lithuania was modelled using biogenic CO₂ to its full potential (by 2040, around 3.5 million tons per year). It is estimated that between 2030 and 2060, the development of the synthetic fuels sector in Lithuania could require around EUR 3.4 billion in investments, nearly half of which would be for the electrolysis capacity extension. A large-scale amount of renewable electricity (around 27 TWh per year by 2040), significant hydrogen production capacities and efficient CO₂ capture from biogenic sources would also be required.

It is estimated that the development of the synthetic fuels sector could directly and indirectly generate added economic value of up to EUR 40 billion, including greenhouse gas emission reductions, added value creation, and tax revenues across the value chain.

The transition to synthetic fuels would contribute to strengthening energy independence, reducing fossil fuel imports, reducing emissions, while creating new jobs and promoting the supply chain development in Lithuania.



Electricity system flexibility

Amber Grid carried out the Analysis of the Interaction between Green Hydrogen Ecosystem and Electricity Sector. The analysis was prepared in accordance with the measure "Conduct an analysis of the interaction between green hydrogen ecosystem and electricity sector, assessing power-to-gas technologies and their application in providing electricity system flexibility services" under the Action Plan for the Implementation of the Hydrogen Development Guidelines in Lithuania 2025-2027.

The analysis shows that power-to-hydrogen technologies (electrolysis units) have the technical capacity to provide electricity system flexibility services, except for services not related to frequency regulation.

The presence of green hydrogen producers in electricity flexibility markets will be associated with the aim of reducing final hydrogen price and optimising operating costs, but the main source of revenue will remain green hydrogen sales, whereas the hydrogen production profile will be associated with the needs of the green hydrogen end user. The analysis also identifies economic, technological, and regulatory barriers due to interaction between these sectors, which could be reduced through three key measures by: creating hydrogen transportation infrastructure, implementing dynamic electricity transmission tariff, and clearly defining flexibility needs and national targets.

4.8. Business plans and prospects

By contributing to Lithuania's ambitious goals for a greater share of renewable energy in the domestic energy balance, the Company participates in a number of initiatives and projects that enable its specialists to develop competencies in the field of RES gas. The Company's membership in the ERGaR (European Renewable Gas Registry) association and in the Association of Issuing Bodies (AIB), besides the aforementioned goals, enables to develop new competencies, and to contribute to the EU-wide legislative and related initiative development, thereby contributing to the promotion of green gas production and market development in Lithuania in the future, safeguarding the business continuity of the Company, and implementation of the National Energy Strategy. Looking at the outlook for gas transmission, in 2026, the Company expects to transport about 17.4 TWh to domestic gas exit points, 9.4 TWh to Poland, around 26 TWh to Kaliningrad Region, and 13.4 TWh to Latvia. As estimated for 2025, the bigger part of the natural gas quantity for consumers of Lithuania and other Baltic States is forecast to come from Klaipėda LNG terminal.

4.9. Financial report

Company	2025	2024	2023
Financial performance (EUR thousand)			
Revenue	69,716	74,583	81,337
EBITDA	17,319	26,520	25,739
Adjusted EBITDA	27,436	27,366	24,680
Profit (loss) before taxation	11,165	9,502	13,992
Net profit (loss)	1,360	8,306	13,425
Adjusted net profit (loss)	9,983	10,073	9,236
Net cash flows from operating activities	15,059	34,594	39,940
Investments	21,782	6,405	35,703
Net debt	125,224	82,534	95,175
Profitability indicators (%)			
EBITDA margin (%)	24,8	35,6	31,6
Net profit (loss) margin	2,0	11,1	16,5
Average return on assets (ROA)	0,4	2,5	4,0
Average return on equity (ROE)	0,8	4,6	7,2
Average adjusted return on equity (ROE)	5,8	5,5	5,0
Liquidity indicators			
Total liquidity ratio	0,29	0,39	0,43
Fixed assets turnover	0,24	0,27	0,28
Capital structure indicators			
Equity-to-assets ratio	0,51	0,54	0,56
Net debt to equity ratio	0,75	0,47	0,51
Net debt to EBITDA ratio, times	7,23	3,11	3,70
Net debt to adj. EBITDA ratio, times	4,56	3,02	3,86
Market value indicators			
Share price to earnings per share ratio (P/E), in times	170,5	24,9	14,6
Net earning (loss) per share, EUR	0,01	0,05	0,08

Formulas for calculating indicators:

EBITDA margin = EBITDA/revenue

Net profit (loss) margin = net profit (loss)/revenue

ROA = net profit (loss)/average asset value

ROE = net profit (loss)/average equity value

Current ratio = current assets/current liabilities

Turnover of non-current assets = revenue/property, plant and equipment and intangible assets

Equity-to-assets ratio = equity/assets

Financial debt-to-equity ratio = financial debt/equity

Financial debt-to-EBITDA ratio = financial debt/EBITDA

Share price/earnings per share ratio = share price at the end of period/(net earnings/number of shares)

Investments (additions of property, plant and equipment and intangible assets)

Adjusted indicators were calculated by restating revenues, expenses, and profitability metrics to reflect temporary regulatory deviations from the regulated rate of return approved by NERC, the effects of non current asset revaluation, and other non recurring gains or losses.

Revenue

In 2025, the revenue totalled EUR 69.7 thousand, i.e. increased by 7% compared to 2024 (EUR 4.9 million). Revenue was lower than in 2024 due to a 12% decrease in the volume of gas transmitted and a 35% decrease in the demand for balancing gas.

Balancing product revenue are generated from technological balancing of the transmission system determined by the features of the technological transmission system and the deviations in gas flows (imbalances) arising for technical reasons.

Revenue structure, %; EUR million



Expenses

Operating expenses (excluding depreciation, other non-cash items) amounted to EUR 52.4 million in 2025, an increase of 9% compared to 2024. The increased was a result of higher operating expenses.

Wages and salaries and related expenses amounted to EUR 17.3 million (33% of total expenses), an increase of 12% compared to 2024. Repair and maintenance costs amounted to EUR 3.5 million (7% of the total costs).

Natural gas expenses amounted to EUR 15.1 million and accounted for 29% of total expenses Compared to 2024, the natural gas expenses decreased by 9% due to o lower gas prices and volumes.

Operating costs; EUR million

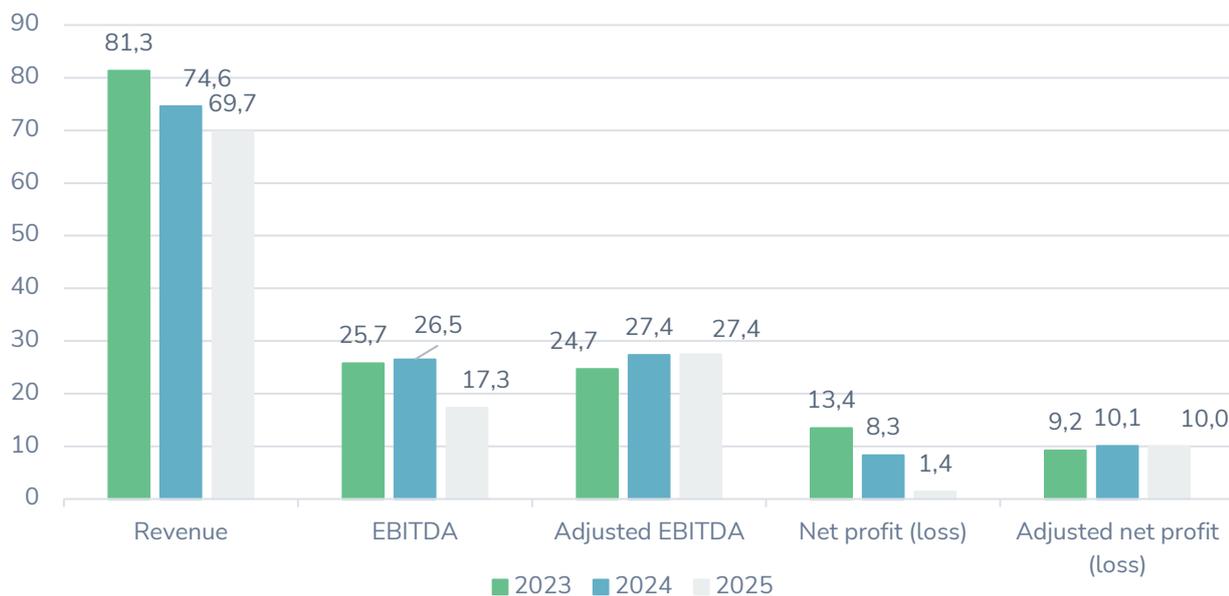


Operating results

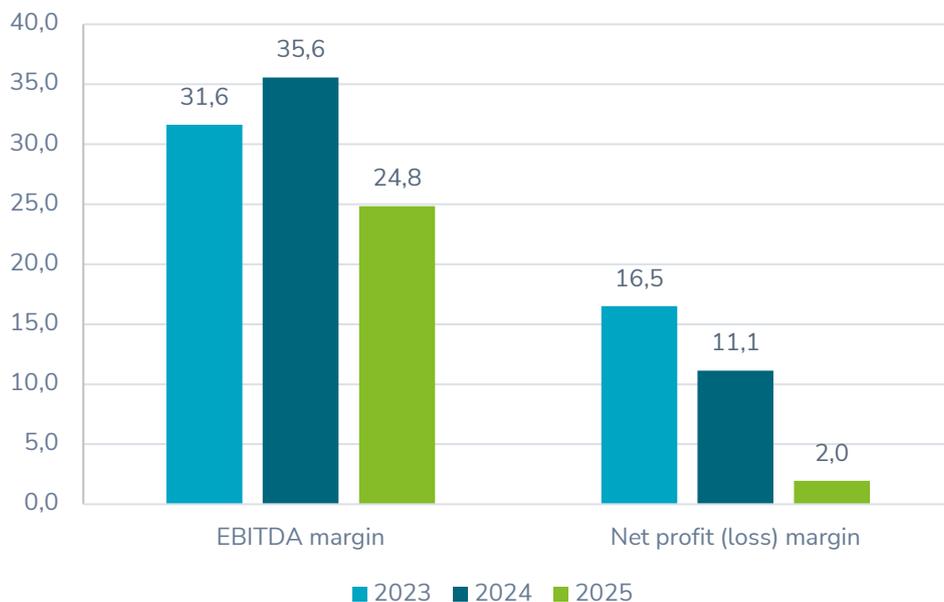
In 2025, net profit totalled EUR 1.4 million, i.e. decreased by 6.1% compared to 2024 (EUR 8.3 million). The Company's earnings before taxes, interest, depreciation and amortisation (EBITDA) amounted to EUR 17.3 million (2024: EUR 26.5 million).

In 2025, the decrease in net profit and EBITDA was a result of higher operating expenses. The adjusted indicators remained stable.

Operating results, EUR million



Profitability, %

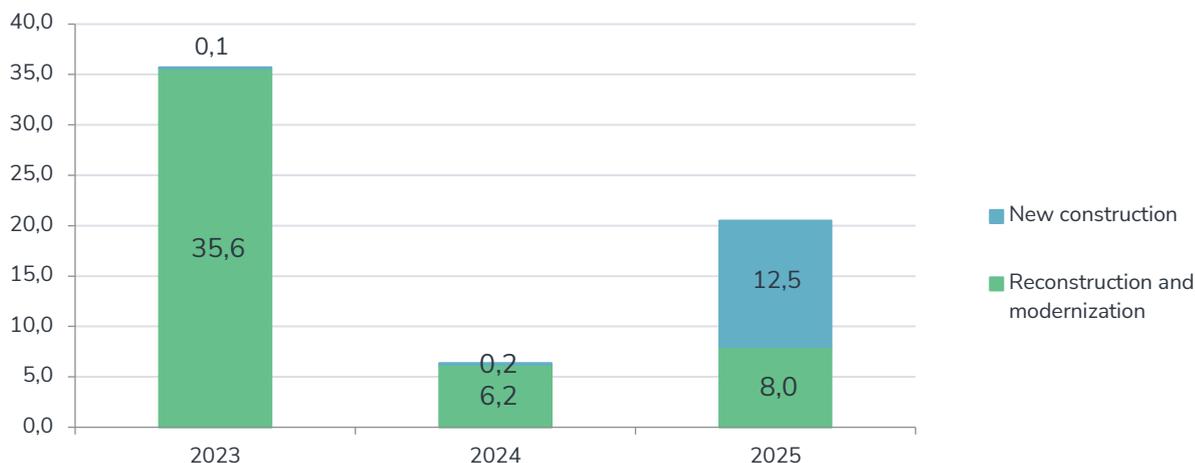


Investments

In 2025, investments amounted to EUR 20.5 million and were by EUR 14.1 million higher than in 2024 (EUR 6.4 million). The investments were increased due to the launch of the construction of the Jauniūnai electric compressor (EUR 12.5 million). A more detailed description of investments under way and planned is provided in sections 3.3 and 4.2 of this report.

In planning and executing investments, the Company is guided by the Technological Assets Development and Operation Policy, which aims to justify and prioritise investments in the natural gas transmission system infrastructure by applying cost-benefit analysis. Investments in the gas transmission system ensure the safe, reliable, economically and environmentally efficient transmission of natural gas to customers and consumers.

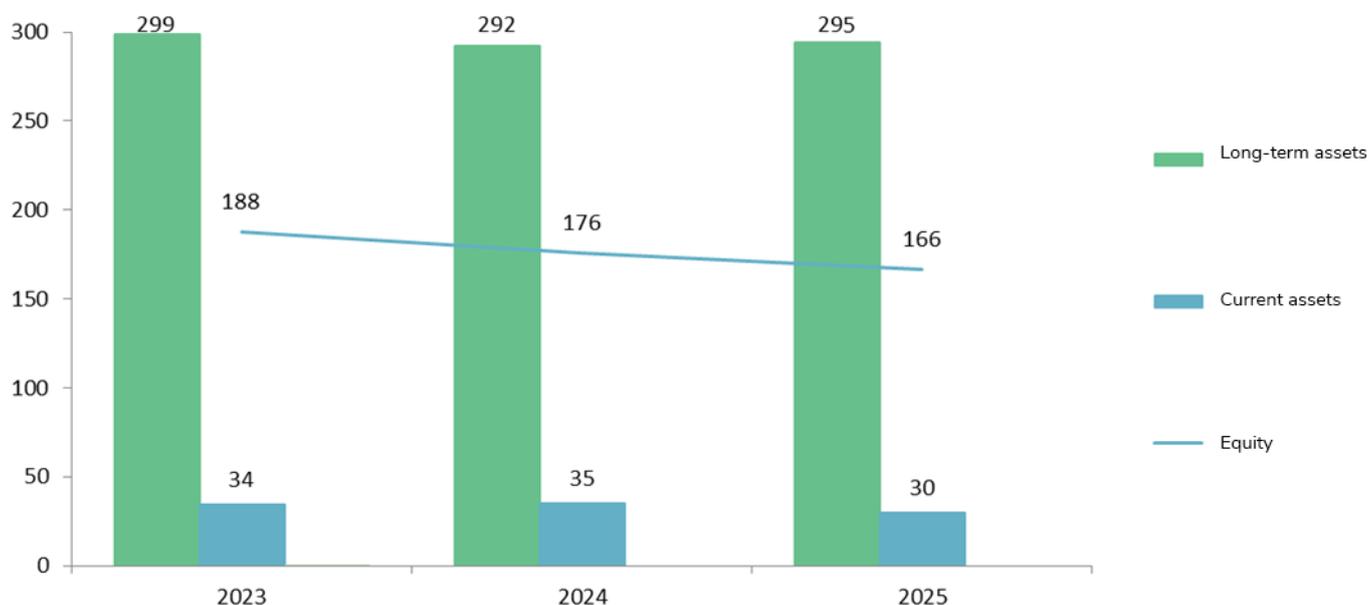
Investments, EUR million



Assets

As at 31 December 2025, assets amounted to EUR 324.7 million: non-current assets accounted for 91% and current assets 9% of the total assets. Non-current assets increased by 1% to EUR 294.9 million in 2025 due to investments above depreciation. As at 31 December 2025, current assets amounted to EUR 29.9 million. During 2025, their value decreased by 15% due to lower amount of LNGT funds received and decrease in financial assets.

Assets and equity, EUR million



Equity and liabilities

During 2025, equity decreased by 5% due to dividends paid above the profit earned in 2025, and, at the end of the reporting period, amounted to EUR 166.3 million. At the end of the reporting period, equity represented 51% of the total assets. As at 31 December 2025, payables and liabilities amounted to EUR 158.5 million, an increase of 5% during the year. As at 31 December 2025, the financial debt (loans) amounted to EUR 123.7 million, an increase of EUR 38.9 million due to rise in payments for non-current assets during the reporting period. Net debt-to-equity ratio was 76%.

Cash flows

In 2025, net cash flows from operating activities amounted to EUR 15.1 million (2024: EUR 34.6 million). Capital investments amounted to EUR 49.6 million (2024: EUR 6.1 million). The investments were increased due to the CBCA contribution paid to the Polish transmission system operator (EUR 28.8 million) and the payment made for the electric gas compressor (EUR 11.8 million).

Adjusted indicators

Adjusted performance indicators are presented to reflect the Company's performance more accurately in a given period and to provide a more objective comparison with prior periods. Regulated revenue, expense and profitability indicators were adjusted due to temporary regulatory deviations from the regulatory profitability approved by NERC, also eliminating atypical/one-off transactions (sale of shares in GET Baltic UAB).

The adjustments to the indicators are:

- The profitability adjustment (temporary regulatory differences for previous periods) approved by the NERC's decision for the reporting period;
- A projected NERC's adjustment for the next period due to deviations in the current period's regulated profitability (temporary regulatory differences for reporting period);
- Other non-ordinary transactions, income tax adjustments.

Company's adjusted indicators, Eur million

	2025	2024
EBITDA	17.3	26.5
Temporary regulatory differences for previous period	4.6	2.0
Temporary regulatory differences for reporting period	5.5	-1.1
Adjusted EBITDA	27.4	27.4
Net profit	1,4	8,3
Temporary regulatory differences for previous period	4.6	2.0
Temporary regulatory differences for reporting period	4.5	-0.3
Other (non-ordinary transactions, income tax adjustments)	-0.5	0.1
Adjusted net profit	10.0	10.1

References to and additional explanations of data reported in the financial statements

Other information has been disclosed in the notes to the financial statements of Amber Grid for the year 2025.

Information on significant events after the end of the reporting period

Significant events after the end of the reporting period have been disclosed in the notes to the financial statements of Amber Grid for the year 2025.

Information on any financial assistance

On 30 April 2025, the Company's General Meeting of Shareholders allocated EUR 500 thousand of distributable profit to support. The humanitarian aid to Ukraine for the reconstruction of Ukraine's energy facilities damaged by the war amounted to EUR 45 thousand.

The Company's support and humanitarian policy in Lithuanian is publicly available at: [Politikos | Amber Grid](#)

Information on related-party transactions, significant arrangements and detrimental transactions

Information on related-party transactions is presented in the financial statements of Amber Grid for the year 2025.

During the reporting period, the Company neither entered into any detrimental transactions (transactions that are inconsistent with the Company's objectives or standard market terms, that infringe on interests of shareholders or any other stakeholders, etc.), nor into any transactions giving rise to conflict of interests in respect of responsibilities fulfilled by the Company's management, controlling shareholders or any other related parties, also in respect of the Company's interests and their private interest and/or other responsibilities.

The Audit Committee of EPSO-G, which operates at the group level and performs the functions of the Audit Committee of Amber Grid, expresses opinion on each related-party transaction of Amber Grid. The Audit Committee assesses whether the respective related-party transaction has been concluded on market terms, and whether the transaction is fair from the standpoint of all the shareholders.

Amber Grid's related-party transactions, 2025

Agreement No	Type of relationship	Name of related party	Details of related party	Agreement effective date	Type	Subject of agreement	Estimated value, excl. VAT
14-177-2013	SOE	KN Energies AB	Company code 110648893, Burių st. 19, LT-92276 Klaipėda	20/02/2025	Cooperation agreements	Additional agreement on the amendment of the payment of funds of liquefied natural gas terminal no 14-177-2013	0.00
	SOE	Ignitis renewables UAB	Company code 304988904, Laisvės ave. 10, LT-04215 Vilnius	02/01/2025	Non-disclosure agreement	Mutual non-disclosure agreement	0.00
CPO348354	SOE	Žemės ūkio duomenų centras VĮ	Company code 306205513, Vinco Kudirkos st. 18-1, LT-03105 Vilnius	27/06/2025	Purchase of services	(VPP-388) cadastral measurements and cadastral file compilation (incl. Verification) services for engineering structures (access routes) located in Šiauliai distr. Mun., Šiauliai rural eld., Vinkšnėnai vlg. Ir Ukmergė distr. Mun., Vidiškės eld., tvarkai vlg.	890.89
SUT-K-2025-0016	EPSO-G Group	Tetas UAB	Company code 300513148, senamiesčio st. 102b, LT-35116 Panevėžys	12/06/2025	Financial agreements	Tax loss transfer and takeover (2024)	1000000.00
	EPSO-G Group	EPSO-G UAB	Company code 302826889, Laisvės ave. 10, LT-04215 Vilnius	12/06/2025	Financial agreements	Regarding tax loss transfer and takeover (2024)	6200000.00
Centre of Registers No PS-1212 (10.46 E)	SOE	State enterprise centre of registers	Company code 124110246, Lvivo st. 25-101, LT-09320 Vilnius	02/06/2025	Other than public procurement contracts	Agreement on the provision of data from the register of legal entities and the address register of the republic of Lithuania	0.00
CPO274751	SOE	Lietuvos paštas AB	Company code 121215587, J.Balčikonio st.3, LT-03500, Vilnius	07/05/2025	Purchase of services	Courier services	0.00
SUT-2016/1	SOE	Ignitis UAB	Company code 303383884, Laisvės ave. 10, LT-04215 Vilnius	27/08/2025	Cooperation agreements	Additional agreement on the payment of funds of liquefied natural gas terminal	0.00
2025-SUT-071	EPSO-G Group	EPSO-G UAB	Company code 302826889, Laisvės ave. 10, LT-04215 Vilnius	27/08/2025	Financial agreements	Lending and borrowing	0.00
2025-SUT-061	EPSO-G Group	EPSO-G UAB	Company code 302826889, Laisvės ave. 10, LT-04215 Vilnius	01/08/2025	Financial agreements	Long-term loan agreement	58415000.00

PS-1615 (10.46 E)	SOE	State enterprise centre of registers	Company code 124110246, Lvivo st. 25-101, LT-09320 Vilnius	31/07/2025	Other than public procurement contracts	Agreement for the provision of address identification and information services	999,999.00
VPP-556	SOE	Žemės ūkio duomenų centras VĮ	Company code 306205513, Vinco Kudirkos st. 18-1, LT-03105 Vilnius	18/12/2025	Purchase of services	(VPP-556) design plan of the real estate unit (engineering structure) located in Telšiai, Geležinkelio st., subdivided into separate structures and cadastral surveying file compilation (incl. Verification) services for these engineering structures	224,000.00
4291955/1	SOE	Ignitis UAB	Company code 303383884, Laisvės ave. 10, LT-04215 Vilnius	18/11/2025	Purchase of services	EV charging at public charging stations	12,800.00
4291955/2	SOE	Ignitis UAB	Company code 303383884, Laisvės ave. 10, LT-04215 Vilnius	18/11/2025	Purchase of services	EV charging at public charging stations	4200.00
4291955/3	SOE	Ignitis UAB	Company code 303383884, Laisvės ave. 10, LT-04215 Vilnius	18/11/2025	Purchase of services	EV charging at public charging stations	10000.00
CPO274751	SOE	Lietuvos paštas AB	Company code 121215587, J.Balčikonio st.3, LT-03500, Vilnius	07/11/2025	Purchase of services	Courier services	2548.00
	SOE	AB Oro navigacija	Company code 210060460, B. Karvelio st.25, LT-02184, Vilnius	03/11/2025	Cooperation agreements	Cooperation agreement	0.00
	SOE	Via Lietuva AB	Company code 188710638, Kauno st. 22-202, LT-03212 Vilnius	29/10/2025	Design/works/contracting services purchase agreements	Preparation of a project for the gas transmission system reconstruction (relocation) (branch to Girininkai GDS)	0.00

05

How we make decisions



- 5.1. Management structure
- 5.2. How we make decisions
- 5.3. Amber Grid operational system and documents
- 5.4. Information on compliance with the corporate governance code
- 5.5. Issued capital
- 5.6. Shares and shareholder rights
- 5.7. Shareholders
- 5.8. Trading in securities on regulated markets
- 5.9. Dividends
- 5.10. Agreements with intermediaries of public trading in securities
- 5.11. Risk management framework
- 5.12. Key risks and their management

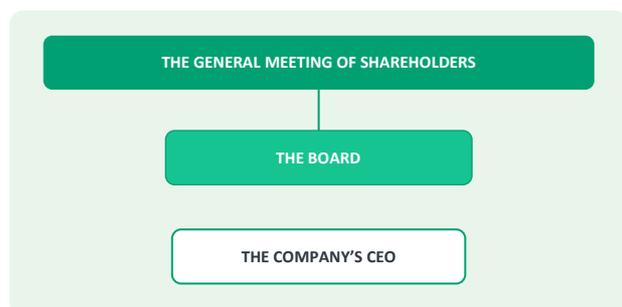
5. How we make decisions

5.1. Management structure

The Company's activities are governed by the Law on Companies and the Law on Securities, the Company's Articles of Association, and other legal acts of the Republic of Lithuania. The competence of the General Meeting of Shareholders, the rights of shareholders and their enforcement are defined in the Law on Companies and in the Company's Articles of Association. The Company's Articles of Association are available at <https://ambergrid.lt/en/doclib/q0ofcjrmdma13vm5v29pr98tuuskjkh>

The Articles of Association provide that they may be amended in accordance with the procedure laid down in the Law on Companies.

The Company's bodies provided for in the Articles of Association



General Meeting of Shareholders

The Company's procedure for convening the General Meeting of Shareholder, decision-making process, and the powers of the General Meeting of Shareholders are consistent with those stipulated in the Law on Companies, except for the additional powers of the General Meeting of Shareholders stipulated in Article 25 of the Company's Articles of Association.

Article 25 of the Articles of Association provides that the General Meeting of Shareholders shall also decide on (additional competence of the Meeting):

- appointment and removal of the Board members, remuneration of the Board members, conclusion of contracts with the Board members and standard terms and conditions;
- suspension or non-suspension of members of the Board and the adoption of a decision in the event of a conflict of interest between members of the Board, in the cases provided for in Article 48 of the Articles of Association;
- approval of decisions of the Board referred to in Article 36 (iii) to (vii) of the Articles of Association, if the value, price or amount of the transaction concerned exceeds EUR 20,000,000 (twenty million euro), and the decisions referred to in Article 36(viii) to (ix) of the Articles of Association.

Board

The Articles of Association of Amber Grid stipulate that the Company's Board consists of five members appointed by the General Meeting of Shareholders for a term of four years. Two members of the Board shall be independent members. A continuous term of office of a Board member shall be no longer than two consecutive terms of office and, in any case, may not hold the Board member's position for more than 10 (ten) consecutive years. The selection of the Board members shall be carried out in accordance with the Description of the Procedure for the Selection of Candidates to the Collegial Supervisory Body or Management Body of Municipal Enterprise, State or Municipal Company or Subsidiary approved by Resolution No 631 of 17 June 2015 of the Government of the Republic of Lithuania. The powers of the Board of the Company are consistent with those stipulated in the Law on Companies, except for the additional powers stipulated in Articles 34–41 and Article 43 of the Articles of Association. Additional powers of the Board encompass approval of the fundamental documents of the Company (strategy, annual performance targets, budget, etc.), determination of employment terms and conditions of the Company's CEO, determination of prices for gas transmission services and other regulated services, approval of disposal of the Company's assets, conclusion of material transactions stipulated in the Articles of Association.

The Board of the Company also fulfils the following supervisory functions:

- approves or opposes the conclusion of related party transactions, considering the opinion of AC;
- approves the description of the procedure and conditions for the valuation of transactions with related parties concluded on an arm's length basis in the ordinary course of business, as provided for in the Law on Companies;
- supervises the performance of CEO, provides feedback and proposals to the Meeting on CEO's performance;
- considers whether CEO is fit to hold the office in case the Company is operating at a loss;
- proposes to CEO to revoke his decisions that are contrary to laws and regulations, the Articles of Association, decisions of the Meeting or the Board;
- decides on other matters pertaining to supervision of activities of the Company and the Company's CEO that are assigned to the authority of the Board under the Articles of Association or by the decision of the Meeting.

4 If the Board is unable to adopt a decision that is directly or indirectly related to the personal interests of a respective Board member, because none of the Board members may vote on the matter due to a conflict of interest, the respective decision shall be taken by the General Meeting of Shareholders. (iii) decisions on the acquisition of long-term assets for a price exceeding EUR 2,000,000 (two million euros) (if the price exceeds EUR 20,000,000 (twenty million euros), the approval of the General Meeting is required); (iv) decisions on investing, transferring or leasing Company assets with a carrying amount exceeding EUR 2,000,000 (two million euros) (calculated separately for each type of transaction) (if the value exceeds EUR 20,000,000 (twenty million euros), the approval of the General Meeting is required); (v) decisions on pledging or mortgaging Company assets with a carrying amount exceeding EUR 2,000,000 (two million euros) (calculated as the total amount of transactions) (if the value exceeds EUR 20,000,000 (twenty million euros), the approval of the General Meeting is required); (vi) decisions on guaranteeing or providing surety for the obligations of other persons in an amount exceeding EUR 2,000,000 (two million euros) (if the amount exceeds EUR 20,000,000 (twenty million euros), the approval of the General Meeting is required); (vii) decisions to conclude any other transactions/agreements (not mentioned in separate Articles of the Articles of Association) under which the Company acquires goods, services or works with a value expressed in monetary terms exceeding EUR 2,000,000 (two million euros) (if the value exceeds EUR 20,000,000 (twenty million euros), the approval of the General Meeting is required); (viii) decisions on the transfer, pledge, change of legal status or encumbrance of disposal of assets owned by the Company that are included in the list of installations and assets important for ensuring national security, as defined in the Law on the Protection of Objects Important for National Security of the Republic of Lithuania, if the value of such installations exceeds 1/20 of the Company's share capital; (ix) decisions on the transfer of shares or rights granted by shares, or on any other encumbrance of disposal, of companies directly or indirectly controlled by the Company that own, develop, operate or otherwise use the installations referred to in subparagraph (viii), as well as decisions on increasing or reducing the share capital of such companies or other actions that may change the structure of their share capital (e.g., issuance of convertible bonds), and decisions on the reorganisation, division, restructuring, liquidation, transformation or other actions changing the legal status of such companies.

Information on Amber Grid's Board members, CEO and Chief Accountant



**Karolis
Švaikauskas**

Board member since 20 April 2020 (re-elected on 20 April 2022). The term of office ended on 20 April 2024. Re-elected as a board member for a new term on 30 April 2024.

Education: Vytautas Magnus University – Bachelor's degree in History; Master's degree in Political Science and Baltic Region Studies. Humboldt University of Berlin – Scandinavian and Northern European Studies.

Other positions: Head of the Energy Competitiveness Group at the Ministry of Energy.

Experience: K. Švaikauskas has 15 years of experience in implementing national energy policy, strategic planning, and developing cross-border cooperation. His nine years of service on the boards of state-owned enterprises, including listed joint-stock companies, representing the state as a shareholder, provided him with strong expertise in corporate governance, risk management, and business transformation. As the head of the Energy Competitiveness Group, he significantly contributed to the development of energy resource markets, increased competition, improved the investment environment, and supported major changes in the energy sector.

Does not own shares in Amber Grid.



**Paulius
Butkus**

Chair of the Board since 10 May 2024. Board member from 11 April 2023 to 20 April 2024. Re-elected to a new term of the Board on 30 April 2024.

Education: Vilnius University – Bachelor's degree in Nuclear Physics; Vilnius Gediminas Technical University – Master's degree in Electrical Engineering and PhD in Electrical and Electronic Engineering.

Other positions: Head of Development and Innovation at UAB "EPSO-G".

Experience: Paulius Butkus is an energy sector executive with more than 12 years of international experience in energy system operations, markets, innovation, infrastructure, and strategy development. He serves as Head of Strategy at EPSO-G, where he oversees group-wide strategic development, risk management, sustainability and innovation governance, and data analytics. He supervises major future infrastructure development projects and is Chairman of the Board of Amber Grid and Chairman of the Board of Energy Cells. He holds a Bachelor's degree in Nuclear Physics, a Master's degree in Electrical Engineering, and a PhD in Electrical and Electronic Engineering.

Does not own shares in Amber Grid.



**Peter Loof
Helth**

Board member since 30 April 2024.

Education: Master's studies in Mathematics and Economics; Executive Leadership Programme at Copenhagen Business School.

Other positions: Senior Product Manager at Sweco Danmark (CVR: 48233511).

Experience: P. Helth has competencies in digitalization and energy industry transformation, with experience across public, private, and shareholder-owned sectors. He has held key roles in strategy, finance, and digital technology at Ørsted (formerly DONG Energy), a major driver of Denmark's green energy transition. He currently leads product management for software solutions serving the public sector and critical infrastructure operators at Sweco Denmark.

Does not own shares in Amber Grid.



**Darius
Kašauskas**

Board member since 20 April 2020 (re-elected on 20 April 2022). The term of office ended on 20 April 2024. Re-elected as a board member for a new term on 30 April 2024.

Education: Vilnius University, Master's degree in Economics; ISM University of Management and Economics, Master's degree in Management; BI Norwegian Business School, Master's degree in Management; ISM University of Management and Economics, Doctoral studies in Social Sciences (Economics).

Other positions: Chief Financial Officer of EPSO-G Group (UAB); Chairman of the Board at Tetras (UAB).

Experience: D. Kašauskas has long-standing experience in corporate finance and treasury management, strategic planning and management, regulation of energy and infrastructure companies, mergers and reorganizations, as well as corporate governance.

Does not own shares in Amber Grid.



Alexander
Feindt

Board member since 30 April 2024.

Education: University of Konstanz – Master’s degree in Politics and Management.

Other positions: Head of Regulatory Affairs at NeuConnect.

Experience: Alexander F. has extensive international management experience in the energy, power, gas, and maritime industries. His career includes roles at Shell and Everllence (MAN Energy Solutions). He has also served as Chairman of the Board of the German Maritime LNG Platform and Chairman of the Board of the EU Renewable and Low-Carbon Fuels Industry Alliance.

Does not own shares in Amber Grid.

Nemunas
Biknius

Chief Executive Officer since 8 April 2020.

Education: Vilnius Gediminas Technical University – Master’s degree in Energy and Thermal Engineering; Aalborg University (Denmark) – Environmental Management studies; ISM University – MBA studies.

Other positions: Independent member of the Supervisory Board and Audit and Risk Committee at the Public Institution Klaipėda State Seaport Authority; Member of the Council of the National Lithuanian Energy Association (NLEA).

Owns 0.001505% of Amber Grid shares.

Rasa
Baltaragienė

Head of the Accounting Department since 2 December 2019.

Does not own shares in Amber Grid.

5.2. How we make decisions

In 2025, corporate governance of the EPSO-G Group is carried out in accordance with the version of the EPSO-G Group Corporate Governance Guidelines approved on 29 December 2022 by the Ministry of Energy of the Republic of Lithuania, which exercises the rights and duties of the sole shareholder of EPSO-G. The guidelines establish corporate governance principles applied uniformly across all EPSO-G Group companies, regulate the governance model, management structure, and the system for ensuring management, control, and accountability.

The corporate governance policy sets out the following seven core corporate governance principles:

- **Principle of creating conditions for effective corporate governance**, aimed at ensuring that Group management and necessary decisions are made efficiently;
- **Proportionality principle**, aimed at ensuring that the governance methods applied by EPSO-G are proportionate and do not create an excessive administrative burden;
- **Shareholder rights implementation principle**, aimed at ensuring appropriate conditions for all shareholders to exercise their rights and legitimate interests;
- **Stakeholder engagement principle**, which acknowledges the rights and expectations of stakeholders;
- **Transparency principle**, aimed at ensuring that the Group’s governance is conducted transparently, with proper disclosure of material information;
- **Accountability and responsibility of governing bodies**, aimed at ensuring that governing bodies properly and responsibly perform their functions and act impartially toward their members and shareholders;
- **Integrity principle**, aimed at ensuring both vertical and horizontal integrity.

The Company adheres to good governance practices presented in the recommendations issued by the Organisation for Economic Co-operation and Development (OECD), the United Nations, *Nasdaq Vilnius*, and other internationally recognized standards and good governance guidelines. Their main objective is to ensure that state-owned enterprises are governed transparently and efficiently.

By consistently working to earn trust in ongoing strategic projects and dedicating significant attention to operational transparency and accountability, the overall governance quality of the *EPSO-G* Group and the Company received an **“A” rating** in the GOOD GOVERNANCE INDEX for 2024/2025 by VKC. By consistently working to earn trust in ongoing strategic projects and dedicating significant attention to operational transparency and accountability, the overall governance quality of the *EPSO-G* Group received an **“A” rating** in the VKC Good Governance Index for 2024/2025.



A

Amber Grid corporate governance results (overall good governance rating: A)

- Transparency: A
- Strategic Management: A+
- Sustainability: A
- Shareholder Actions: A

5.3. Amber Grid operational system and documents

Board meeting attendance in 2025

During the reporting period, 22 board meetings were held.

No.	Board Member	Meeting Attendance
1.	Karolis Švaikauskas	22/22
2.	Paulius Butkus	22/22
3.	Alexander Feindt	22/22
4.	Darius Kašauskas	22/22
5.	Peter Loof Helth	22/22

Major decisions adopted by the Board in 2025

01
JANUARY

2 January. Initiation of the Company's CEO selection and approval of the list of requirements for the Company's CEO selection.

14 January. Approval of Amber Grid AB Strategy for 2025-2035 and Budget for 2025.

24 January. Approval of the Company's CEO objectives for 2025, which are identical to those of the Company's CEO.

02
FEBRUARY

25 February. Assessment of Alexander Paul Gudmund Feindt and Peter Loof Helth, independent members of the Board, for their independence. A decision was made to consider these members of the Board independent. A decision was made to conclude a contract for the design services and contract works for the reconstruction of sections of Vilnius-Kaunas (DN350) main gas pipeline, including, if necessary, the preparation of a territorial planning document, and to approve the essential terms of the contract.

03
MARCH

12 March. Setting the percentage of achievement of the Company's performance targets, which are identical to those of the Company's CEO.

04
APRIL

3 April. Selection of Nemunas Biknius as the Company's CEO for a second term and approval of the terms of employment contract.

7 April. Approval of the levels of top-level management positions applicable from 01/05/2025. Voting at the ordinary general meeting of shareholders of UAB GET Baltic on the approval of the financial statements audited by an independent auditor and profit (loss) distribution project. Approval of the Company's consolidated Management

Report 2024 and the Information on Remuneration 2024, which is part of the AB Amber Grid's Consolidated Management Report 2024. Approval of the Company's financial statements 2024 and the Company's profit (loss) distribution project 2024. A decision was made to convene the Company's Ordinary General Meeting of Shareholders on 30 April 2025 at 10 a.m., at the Company's premises (address Laisvės ave. 10, Vilnius). Approval of the agenda and proposed decisions of the General Meeting of Shareholders. Approval of the Report on the Implementation of the Company's Strategy.

23 April. Conducting the evaluation of the performance of the Company's CEO and awarding financial incentive.

05

MAY

23 May. Approval of the Company's gas transmission service prices for 2026 and submission to the National Energy Regulatory Council for approval.

06

JUNE

20 June. A decision was made to conclude the contract for the procurement of the object part I (POD I) of the design services and construction works of the replacement/installation of closing devices and the reconstruction of the installation of operational remote control (SCADA), and to approve the essential terms of the contract.

07

JULY

22 July. A decision was made to conclude a loan agreement with UAB EPSO-G and to approve the essential terms of the agreement. Approval of the change in the annual interest rate and bank margin set in the loan agreement of 19/08/2015 between Amber Grid AB and Nordic Investment Bank.

08

AUGUST

20 August. A decision was made to conclude the contract for the design services and construction works for the installation and reconstruction of the electric gas compressor at the Jauniūnai Gas Compressor Station, and to approve the essential terms of the contract, subject to the approval of the General Meeting of Shareholders.

26 August. Termination of the intercompany lending and borrowing agreement with EPSO-G UAB from 31/08/2025, conclusion of the intercompany lending and borrowing agreement between Amber Grid UAB, LITGRID AB, EPSO-G UAB, TETAS UAB, Energy cells, UAB, and BALTPPOOL UAB, and approval of the essential terms of the agreement.

09

SEPTEMBER

29 September. Approval of the amendments to the deadline for fulfilling obligations under the works contract for the reconstruction of the Elektrėnai gas distribution station. Approval of the list of the Company's information constituting confidential and commercial (trade) secret.

10

OCTOBER

7 October. Voting at the Ordinary General Meeting of Shareholders of UAB GET Baltic on the approval of the interim condensed financial statements for the eight-month period ended 31 August 2025 and the draft profit (loss) distribution for the eight-month period ended 31 August 2024.

30 October. Approval of the updated draft version of Amber Grid AB Strategy 2035 and its submission to public undertaking Governance Coordination Centre for review.

11

NOVEMBER

18 November. Approval of the updated management structure of AB Amber Grid.

12

DECEMBER

5 December. A decision was made to conclude a service agreement for the natural gas transmission through the Republic of Lithuania to the Kaliningrad region, and to approve the essential terms of the agreement.

18 December. A decision was made to conclude a loan agreement with Nordic Investment Bank and to sign a tripartite debt transfer agreement between Amber Grid AB, EPSO-G UAB and Nordic Investment Bank, and to approve the essential terms of the agreement. A decision was made to change lending and borrowing limits and applicable interest rates under the intercompany lending and borrowing agreement between Amber Grid AB, EPSO-G UAB, LITGRID AB, TETAS UAB, Energy Cells UAB and BALTPPOOL UAB. Conclude two contracts for vehicle rental and maintenance services and approve the essential terms of the contracts. A decision was made to convene the Company's Extraordinary General Meeting of Shareholders on 9 January 2026 at 10 a.m., at the Company's premises (address Laisvės ave. 10, Vilnius). Approval of the agenda and proposed decisions of the General Meeting of Shareholders.

In view of the Guidelines on the Annual Self-Assessment of the Activities of the Group's Collegial Management Bodies approved by the Remuneration and Nomination Committee, at the beginning of 2026, the Company's Board performed the self-assessment of its activities for 2025, and discussed aspects of the implementation of the action plan for 2025. The summarised assessments of each member of the Board were discussed during the session on the self-assessment of the activities of the Board, during which the areas for improvement were identified and directions for improving business processes were determined by setting up an action plan for 2026, agreeing to focus on resilience, the Board's work optimization, trainings of the Board members, and improved sharing of the Group information with the Board members.

Based on the Company's Articles of Association, the Audit Committee's functions at Amber Grid are fulfilled by the Audit Committee of the parent company EPSO-G UAB.

Amber Grid has the following committees acting jointly within the EPSO-G Group:

- Remuneration and Nomination Committee
- Audit Committee

EPSO-G's Remuneration and Nomination Committee

Under the current Articles of Association of EPSO-G, the Remuneration and Nomination Committee shall be composed of at least three members appointed by the Board for a period of up to four years by a reasoned decision. The nomination of members of the Remuneration and Nomination Committee ensures that this Committee has at least one independent member. The continuous term of office of a member of the Remuneration and Nomination Committee shall not exceed two consecutive terms of office. The term of office of the Committee coincides with the term of office of the Board. Only an independent member may be elected to chair the Audit Committee.

During the reporting period, the Remuneration and Nomination Committee had the following members: Robertas Vyšniauskas, Ramūnas Bagdonas (until 31 October 2025), Dovilė Kavaliauskienė (since 2 June 2025) and Liudas Liutkevičius (from 5 November 2025 to 6 January 2026).

EPSO-G's Remuneration and Nomination Committee's responsibilities:

- Assists in carrying out the selections of candidates to the members of the bodies in all companies of the Group;
- Provides the companies of the Group with recommendations regarding the nomination of the members of the management bodies, entry into contracts with them and setting remuneration;
- Makes recommendations on the Group's corporate governance documents relating to the selection, appointment and determination of independence criteria for the governing bodies, senior management;
- Makes recommendations on the system for succession of the Group's managers and critical positions;
- Makes recommendations on the system of equal opportunities, inclusion and diversity promotion within the Group;
- etc.

EPSO-G's Audit Committee

According to the current version of the Articles of Association of EPSO-G, the Audit Committee shall be composed of at least three members appointed by the sole shareholder of EPSO-G for a maximum period of four years, subject to the recommendations (if any) of the Remuneration and Nomination Committee. The continuous term of office of a member of the Audit Committee shall not exceed two consecutive terms. Only an independent member may be elected to chair the Audit Committee.

During the reporting period, the Audit Committee had two independent members: Rasa Balevičienė and Vytenis Lazauskas. Dainius Bražiūnas was nominated by the Ministry of Energy y as a member of the Audit Committee.

EPSO-G's Audit Committee's responsibilities:

- Carries out the monitoring of the preparation and auditing of the financial statements of the Group companies;
- Takes responsibility for the ensuring of the observance of the independence and objectivity principles by the auditors of the Group companies and of audit firms;
- Takes responsibility for the monitoring of effectiveness of the internal control of the Group companies, compliance and risk management, and internal audit, activity processes;
- Takes responsibility for the control of provision of non-audit services by the auditor of the Group companies and / or audit firm;
- Evaluates the transactions concluded by the Group companies, the shares of which are admitted to trading on a regulated market, with the parties concerned.

To ensure transparency and efficiency of its operations, the EPSO-G Group has implemented a centralised internal audit system. It means that the internal audit unit fulfils the assigned functions at the Group level, and is directly accountable to the Board of EPSO-G UAB, the majority of which are independent members. The auditors of EPSO-G UAB are not subordinate to the administration personnel of the auditee.

<https://www.epsog.lt/lt/apie-mus/valdymas/vidaus-auditas-1>

^[1] Information on the professional experience of the members of the Board, the Company's CEO and other senior executives is available at (in Lithuanian) <https://ambergrid.lt/mes/amber-grid/vadovybe/3>

Audit of the financial statements

On 30 August 2023, the General Meeting of Shareholders selected PricewaterhouseCoopers UAB as the audit company that will perform the audit of the financial statements for the period of 2023-2025. The remuneration for the audit of the Company's financial statements was set of no more than EUR 413.7 thousand.

PricewaterhouseCoopers UAB conducted audit of the Company's and its subsidiaries' annual financial statements (including regulated activity verification) for the year ended 31 December 2025 and 2024.

The fee for the audit services of PricewaterhouseCoopers UAB for the years ended 31 December 2024 was EUR 75 thousand.

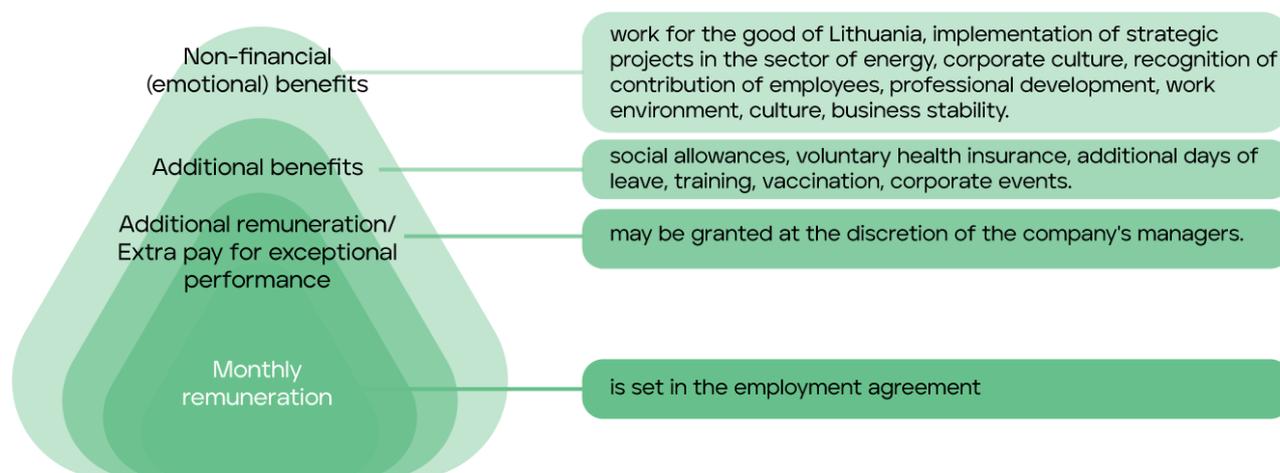
In 2025 and 2024, the non-audit services (regulated activity verification and other services) provided to the Company by PricewaterhouseCoopers UAB amounted to EUR 17 thousand and EUR 18 thousand, respectively.

Remuneration management

On 7 December 2025, the EPSO-G's Group Employee Remuneration, Performance Appraisal and Self-development Policy (hereinafter the "Policy") came into force. It was approved by decision of EPSO-G's Board of 28 October 2025 and applies to all employees of the Company and is available on the Company's website. The Policy is approved by decision of EPSO-G's Board considering the recommendations of the EPSO-G's Remuneration and Nomination Committee. EPSO-G's Remuneration and Nomination Committee periodically evaluates the provisions of the remuneration policy, its effectiveness, implementation, and application. The aim of the policy is to manage remuneration costs in an efficient, clear, and transparent way and, at the same time, to create motivational incentives and to encourage staff to perform better, to contribute more actively to the achievement of objectives, to go beyond the formal performance of their duties, to develop innovative, out-of-the-box solutions, and to improve performance.

The remuneration of EPSO-G Group employees consists of the following components: monthly remuneration; fringe benefits provided for in the Labour Code of the Republic of Lithuania, internal regulations and collective agreements of the Companies; financial incentives; project incentives; incentives for exceptional performance and innovation; fringe benefits; recognition and emotional reward.

Remuneration structure



Components of remuneration

Monthly remuneration is the largest and most important part of the monetary remuneration, which depends on the level of the post, determined for each post according to a methodology used in international practice. The monthly remuneration of staff members is set within the limits of the remuneration scales for the grade of the post concerned, taking into account the staff member's skills (including social and emotional skills), qualification (competences), experience, knowledge, level of accountability and independence in performing the functions assigned to the post, and performance.

Financial incentives are determined by reference to the following standard criteria for assessing the employee's performance: the results of the assessment of the employee's achievement of his/her objectives, the assessment of the employee's value-based behaviour, the results of the assessment of the employee's quality of performance. Financial incentives for the Company's CEO are allocated by the Board of the Company, and for other employees – by the Company's CEO. The financial incentive is paid once a year when the Board of the Company approves the audited financial results of the Company and when they are confirmed by the resolution of the General Meeting of Shareholders.

A one-off bonus for exceptional performance may be payable by the decision of the Company's CEO. For the purpose of maintaining continuous progress, different incentives may be payable to encourage innovation initiatives across the EPSO-G UAB Group. Such incentives may be payable for innovation-driven approach and creativity of employees as they present their innovative ideas.

Amber Grid's average monthly remuneration by category of employees in 2025 (EUR/month):

Groups of job positions	2025	2024
Company's CEO	14,889	14,137
Top-level managers	9,424	9,458
Middle and first-level managers	5,306	5,107
Expert professionals	3,116	3,270
Workers	2,447	1,965
Total:	3,550	3,228
Total annual wage guarantee fund, EUR thousand	16,641	14,652

Remuneration policy for members of collegial management bodies and CEO

On 20 April 2020, the General Meeting of Shareholders of the Company approved the Remuneration Policy for CEO and Board Members of Amber Grid (the updated policy was approved by decision of the Company's General Meeting of Shareholders of 30 April 2024) aimed at establishing common, clear and transparent principles of monetary reward for work of the Company's CEO and Board members and the remuneration system based on these principles in order to effectively manage the Company's operating costs and to create motivational incentives for the CEO and Board members to contribute to the achievement of the Company's mission, vision, values and objectives. The principles of remuneration of members of the Company's management

bodies are also regulated by the Guidelines for determining the remuneration of members of the management bodies of the EPSO-G Group companies approved by the sole shareholder of EPSO-G.

When determining the remuneration for the management bodies, the Company follows a principle that the size of the remuneration and its payment procedure should: promote creation of a long-term and sustainable corporate value of the Company and the entire EPSO-G Group; match the workload of individual bodies of the Company and their individual members; reflect as much as possible the actual situation in the market, i.e. it has to be competitive in terms of the work pay offered in the market for the professionals in the respective fields; ensure remuneration for responsibility undertaken by the management bodies; ensure independence of the independent Board members; encourage attraction of high-level professionals from the respective areas to join the Company's management. Remuneration for the functions fulfilled in the Company's Board may be payable only to those Board members of the Company who meet the criteria set forth in the effective legal acts of the Republic of Lithuania and the Guidelines for Determining the Remuneration for Fulfilment of Functions in the Bodies of EPSO-G UAB and the EPSO-G UAB Group.

By decision of the Extraordinary General Meeting of Shareholders of 30 April 2024, the following fixed monthly remunerations, before tax, were fixed as from the date of adoption of the decision of the General Meeting of Shareholders:

Monthly fixed remuneration before tax

Job position	Monthly fixed pay component (EUR)
Chairman of the Board (independent)	4,600
Member of the Board (independent)	3,500
Member of the Board (civil servant), if the civil servant <u>neither holds the position nor engages</u> in activities of the collegial body of another SE/SOE and/or ME/MOE* ¹	2,800
Member of the Board (civil servant), if the civil servant <u>holds the position and engages</u> in activities of the collegial body of another SE/SOE and/or ME/MOE	1,800

In addition, by the said decision of the General Meeting of Shareholders of 30 April 2024, the total annual budget for 2024 for the remuneration of the Company's Board members and additional expenses to ensure activities of the Board were set at EUR 129.4 thousand.

The tables below present information on remuneration of the members of the management bodies, and annual changes in the remuneration amounts.

Remuneration of the Company's CEO

Position	Full name	Date of appointment	Components of remuneration	Gross wage (EUR)						
				2019	2020	2021	2022	2023	2024	2025
Company's CEO	Nemunas Biknius	October 2019 Appointed for new term of office in April 2025	Total, EUR	20,075	117,192	148,586	159,410	188,090	169,649	178,670
			Variable component, EUR	-	4,581	33,488	38,603	55,462	23,000	24,200
			Variable component, %	-	4%	23%	24%	29%	14%	14%

The amounts of the remuneration paid to the Company's CEO were in line with the Remuneration Policy, and the variable remuneration component was s paid based on the implementation of the annual objectives of the Company set by the Board.

The Company's CEO do not receive a remuneration based on shares of the Company.

* SE - state enterprise, SOE - state-owned enterprise, ME - municipal enterprise, MOE - municipality-owned enterprise

Remuneration of Board members

Position	Full name	Remuneration for work in the Board (EUR)	
		2024	2025
Board member. Re-elected to the Board from 30/04/2024. Chair of the Board from 10/05/2024	Paulius Butkus	-	-
Board member Term of office ended on 20/04/2024 Re-elected to the Board on 30/04/2024	Karolis Švaikauskas	20,118	21,600
Member of the Board from 30/04/2024	Peter Loof Helth	28,167	42,000
Member of the Board from 30/04/2024	Darius Kašauskas	-	-
Member of the Board from 30/04/2024	Alexander Feindt	28,167	42,000

A fixed monthly salary paid to the Board members of the Company is not depend on the financial or non-financial performance of the Company. No variable component or other bonuses are paid to the Board members of the Company. The Board members of the Company also do not receive any share-based payment awarding shares of the Company

[1] The Policy is available on the Company's website at www.ambergrid.lt

Privacy

The Group has a Personal Data Protection Policy based on the principles of the General Data Protection Regulation, which defines the measures taken by the Group companies to ensure the security of personal data processed and the roles and responsibilities of individuals ensuring compliance with the personal data protection requirements.

The personal data processing requirements are covered in more detail in the internal legislation of all Group companies. These Group-wide documents, drawn up on a uniform basis, form a consistent practice across the Group companies when managing personal data security incidents, entering into personal data processing agreements, transferring personal data to third parties, and in other processes.

The Group adheres to the principle of accountability laid down in the General Data Protection Regulation. The Group companies keep records of their personal data processing activities, prepare privacy notices, and carry out and document other actions required by the General Data Protection Regulation.

Personal data protection risks are managed by implementing technical and organisational measures, conducting compliance audits to assess the adequacy of these measures, as well as by unifying personal data protection across the Group.

During the reporting period, three compliance audits were conduct in the Group, in the area of personal data protection. Although these audits did not identify significant non-compliance issues, they highlighted the areas of personal data processing agreements concluded with data processors where improvement is needed.

Compliance Management

The EPSO-G Group has compliance management system in place designed to:

- protect the Group companies from financial or reputational damage that may result from behaviour that does not meet internal and external requirements;
- manage the risks of non-compliance and mitigate their impact and likelihood of occurrence;
- promote a culture of compliance, i. e. encourage the Group's employees to work in accordance with the set requirements and to justify their application on the Group's values.

The Group's compliance is based on the Three Lines Principle and principle governing the use of the risk-based approach.

Compliance activities are governed by the Group's Compliance Management Policy. On 25 of April 2025, the EPSO-G Board approved a new version of the Compliance Management Policy, introducing the establishment of a three-year compliance

management programme and the preparation of annual compliance management plans in the Group companies. The Policy clarifies and supplements the main compliance management processes and specifies the responsibilities of entities participating in compliance management.

During the reporting period, training was organized for experts of the Compliance Management function to increase the level of expertise. The Compliance Management Register was launched, which will allow for effective management of information related to compliance management actions. During the reporting period, the process of developing the Group's three-year compliance management programme and the process of drawing up and monitoring the implementation of the Group's annual Compliance Management Action Plan were approved.

Compliance with sustainability requirements

An action plan for the sustainability compliance priority area for 2024 has been developed. A list of key legislation relevant to sustainability has been drawn up and is included in the Company's monitoring of legislation.

Operation/Materials Control

In 2024, the Company developed and approved the Description of Control on Bringing Materials and Equipment into Operation. Identification and assessment of the likelihood of corruption has been carried out and a conclusion on the 'Control of Materials Input During Construction Works for Amber Grid' has been issued. Employees received continuing training (technicians) on 'Changes in the Law on Construction 2023-2024'.

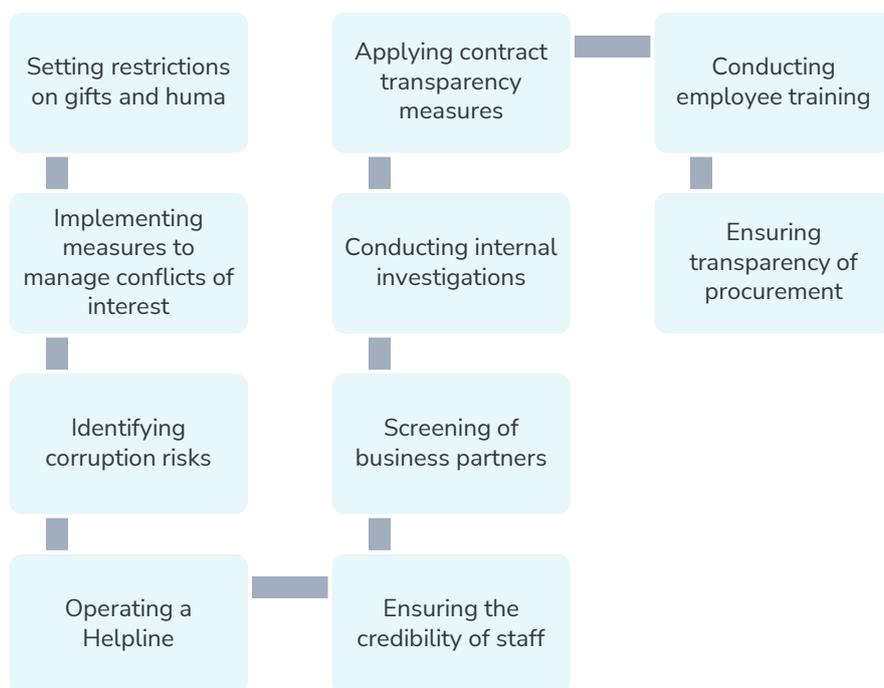
To improve compliance management, in 2024, with the joint efforts of the Group companies, the Compliance Management Methodology was updated, the key compliance management indicators were defined and the compliance management maturity assessment methodology was established. The methodology guided the compliance management maturity assessment of Amber Grid AB during the reporting period. In view of the outcome of this assessment and the drive for a higher level of maturity, the Company's strategy priorities, shareholder expectations and regulatory developments, the Group has, for the first time, the Compliance Management Framework 2025-2027 was established at the Group level, outlining the key priorities and directions for these activities over a three-year period. To promote a culture of compliance, as it was every year, we communicated with employees on external and internal regulatory requirements, organised training, and encouraged to report non-compliance.

In 2024, no significant non-compliance issues were identified in Amber Grid.

Corruption prevention

The EPSO-G Group's business decisions are guided by the principles of objectivity, impartiality, transparency, accountability and the rule of law, combined with the Group's zero tolerance to corruption or any other forms and manifestations thereof. We aim to build a transparent and trust-based Group, therefore continuously assess corruption risks and implement measures to manage these risks.

The EPSO-G Group's anti-corruption activities are based on the international standard ISO 37001:2016 Anti-bribery management systems — Requirements with guidance for use, as well as the following measures implemented in the Group companies:



The following were approved during the reporting period: the Description of the Helpline Operation and Administration Procedure, the Description of the Business Partner Screening Procedure, the Description of the Interest Management Procedure, applicable in the Group companies. In addition, the anti-corruption management systems of the Group successfully completed the recertification process in accordance with ISO 37001:2017.

Corruption risk assessment is carried out in the Company on annual basis in accordance with the Group’s Risk Management Policy and methodology, and the status of implementation of the measures identified to manage corruption risk is assessed on quarterly basis. To improve the management of third-party corruption risks, the Group company has a business partner screening system in place.

In 2025, the Company identified the following corruption-related risks that could have an impact on the Company’s reputation or financial position:

- Corruption-related risks
- Risk of improper management of conflicts of interest
- Risk of recruiting and employing individuals that do not satisfy regulatory requirements

Anti-corruption education of employees is an important part of our Company’s anti-corruption activities, delivered in various forms: training sessions for external or in-house coaches, and communication messages on the current anti-corruption related issues. To ensure consistent anti-corruption awareness-rising among employees, interactive mandatory anti-corruption trainings were developed in the Company. As of 2025, all employees of the Company are required to complete the trainings, which will also be included in the set of mandatory trainings for newcomers.

On 9-20 December 2025, Amber Grid organised an Anti-Corruption Week, during which employees were actively involved in various discussions, training sessions and a survey. The employee tolerance to corruption survey was conducted to determine employees approach to corruption and to identify aspects of anti-corruption requiring improvement. The employees’ participation rate remained similar to recent years (121 employee in 2025, 120 in 2024, and 119 in 2023). Results of the key survey questions remain high: the percentage of employees who have not encountered any forms corruption in their work (97% in 2025, 98% in 2024, 98% in 2023, and 97% in 2022), the percentage of employees who know where to go to report a case of corruption (90% in 2025, 95% in 2024, 98% in 2023, and 97% in 2022).

Key anti-corruption indicators:

2023-2025: no any cases of corruption identified; no any corruption-related cases filed against the Company/employees; no any corruption cases identified due to which contracts with business partners are not concluded.

The Company has Helpline – pranesk@epsog.lt.

The Company's employees and other stakeholders can directly or anonymously report, without fear of negative consequences, via Helpline pranesk@epsog.lt, by completing [online reporting form](#), by mail – to the Company's registered office at Laisvės ave. 10, Vilnius, may report suspected violations, unethical or unfair behaviour to the designated person or to other employees of Prevention Department. No reports related to manifestations of corruption were received in 2025.

Management of Conflicts of Interest

The Company's governance framework promotes avoidance of conflicts of interest among and members of collegial bodies, and ensures a transparent and an effective conflict of interest disclosure mechanism. The Company has an integrated model for the declaration of private interests as defined in the Policy of Management of Interests of Employees and Members of Collegial Bodies. It requires to disclose all private interests of the Company's employees and members of the collegiate bodies in an internal declaration form prescribed by the Group, and, when applicable to the job position and functions, in PINREG, the register of private interests.

Amber Grid implements active monitoring, control and supervision of private interests: assessing potential conflict of interest situations during the job application process, reviewing and analysing declarations, recommending on potential conflicts of interest management and actions and/or decisions requiring refraining.

The Company's anti-corruption activities are targeted to managing corruption risks in Lithuania and abroad. The Company's employees cooperating with foreign officials or officials acting in foreign countries shall be guided in their activities by the principles set in the Anti-Corruption Policy, including the principle of zero tolerance to corruption.

In 2025, no cases of bribery of officials in international business transactions, corruption or other corruption manifestations abroad or in Lithuania were detected in EPSO-G and its subsidiaries.

At the end of the reporting period:

- The members of the collegial management bodies, administrative staff and the Group companies' CEOs have not acquired any shares in EPSO-G group companies, except for Nemunas Biknius, CEO of Amber Grid, who holds 0.001055% of shares in Amber Grid. His shareholding remained unchanged during the reporting period.
- The declarations of interests of all members of the collegial management bodies, members of the Board and the Company's CEO, are submitted and published in the Register of Private Interests (PINREG), on the website of the Chief Official Ethics Commission (COEC) and at www.epsog.lt. All CEO's of EPSO-G Group companies have submitted declarations of interest to the holding company to the extent and according to the procedure set out in the Group's Policy of Management of Interests of Employees and Members of Collegial Bodies, which is available at www.epsog.lt in the menu item "Operating Policies".
- No any conflicts of interest among members of the collegial management bodies and the Group companies' CEOs .
- Members of the collegial management bodies and Group companies' CEOs have not been convicted of any criminal offence, have not been subject to any indictment or sanction by any regulatory authority in the last five years, have not been barred by a court from holding any office as a member of the Company's administrative, management or supervisory bodies of the Company or from holding any managerial position or from managing the affairs of any issuer.
- EPSO-G, Amber Grid has not entered into any transactions with the above-mentioned persons which are outside the operating activities of the Company or which have not been duly notified to and authorised by EPSO-G, Amber Grid's collegiate management bodies.

5.4. Information on compliance with the corporate governance code

Amber Grid complies with the Corporate Governance Code for Companies Listed on NASDAQ Vilnius Stock Exchange (available at www.nasdaqbaltic.com; hereinafter "the Code"). The Code applies to the extent that the Articles of Association of the Company do not provide otherwise. The Company has disclosed its compliance with the requirements of the Code, and such information is available on the Company's website at <http://www.ambergrid.lt>, and on the Central Storage Facility at www.crib.lt.

5.5. Issued capital

The Company's issued capital amounts to EUR 51,730,929.06. It is divided into 178,382,514 ordinary registered shares with nominal value of EUR 0.29 each. One ordinary registered share with the nominal value of EUR 0.29 gives one vote at the General Meeting of Shareholders. All shares are fully paid up. There were no changes in the Company's shareholder structure during 2025. EPSO-G UAB retained its 96.58% shareholding in the Company and was the only shareholder holding more than 5% of the Company's shares. EPSO-G UAB has a casting vote in the decision-making process at the General Meeting of Shareholders.

5.6. Shares and shareholder rights

The number of the Company's shares that entitle their holders to vote at the General Meeting of Shareholders matches the number of shares in issue, which is equal to 178,382,514 shares. All property and non-property rights conferred by the shares of Amber Grid are equal, and none of the Company's shareholders has special control rights. Pursuant to Article 20 of the Law on Companies of the Republic of Lithuania (hereinafter the "Law on Companies"), only the General Meeting of Shareholders of the Company may take decisions on the issuance of new shares and the purchase of its own shares. The Company is not aware of any arrangements between shareholders that may restrict the transfer of securities and/or voting rights. There are no restrictions imposed on the voting rights at the Company. In 2025, the Company did not acquire any own shares and did not enter in any transactions involving the acquisition or disposal of own shares.

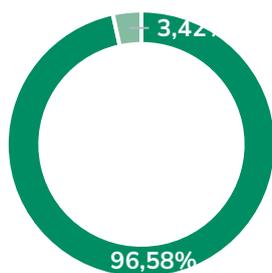
5.7. Shareholders

As at 31 December 2025, Amber Grid had over 2700 shareholders (Lithuanian and foreign natural and legal persons), whereof 1 (one) shareholder held more than 5% of the Company's shares.

Shareholders of the Company

Shareholder	Registered office address/company code	Ownership interest, number of shares
EPSO-G UAB	Laisvės ave. 10, Vilnius, Lithuania, 302826889	172,279,125
Minority shareholders		6,103,389
In total:		178,382,514

Shareholder structure as at 31 December 2025



■ UAB EPSO-G ■ Small shareholders

5.8. Trading in securities on regulated markets

Since 1 August 2013, the Company's shares have been traded on a regulated market and quoted on the Secondary List of NASDAQ Vilnius Stock Exchange.

Main data on Amber Grid's shares	
ISIN code	LT0000128696
LEI code	097900BGMP0000061061
Ticker	AMG1L
Issue size (units)	178,382,514

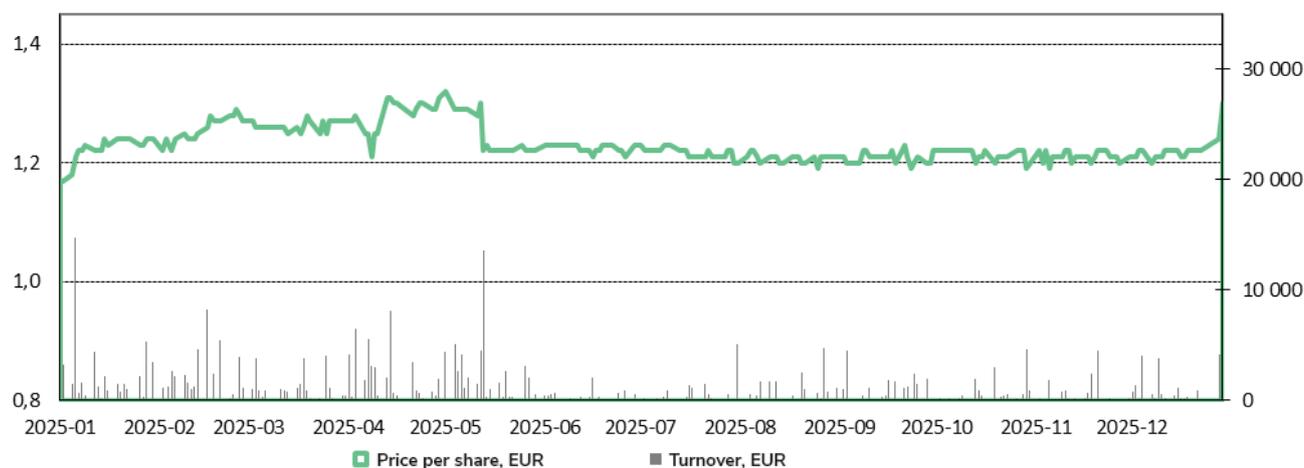
In 2025, the Company's turnover of trading in shares amounted to EUR 0.339 million (2024: EUR 0.393 million), 274,524 shares were transferred by way of transactions (2024: 349,855 shares).

As at 31 December 2025, the Company's share market capitalisation amounted to EUR 231.89 million.

Share price dynamics on NASDAQ Vilnius, 2025



Amber Grid's share price and turnover, 2025



5.9. Dividends

The EPSO-G Group's and Amber Grid's Dividend Policy² stipulates uniform rules for estimation, payment and declaration of dividends across all companies of the EPSO-G Group. The main purpose of the Dividend Policy³ is to set clear guidelines regarding the expected return on equity for the existing and potential shareholders through sustainable corporate value growth of the Group and its companies, and development of the strategic projects, thereby consistently strengthening trust in the whole group of energy transmission and exchange companies.

On 30 April 2025, the Ordinary General Meeting of Shareholders made the decision to pay out dividends in total amount of EUR 10.6 million or EUR 0.0599 per share.

On 30 April 2024, the Ordinary General Meeting of Shareholders made the decision to pay out dividends in total amount of EUR 20.17 million or EUR 0.1131 per share.

5.10. Agreements with intermediaries of public trading in securities

Amber Grid has an agreement with SEB Bankas AB for provision of accounting and related services of the Company's securities.

² The Company's and the Group's Dividend Policy <https://ambergrid.lt/mes/investuotojams/dividendai/605>

The Company also has an agreement with AB SEB Bank on dividend payment/distribution to minority shareholders came into force, under which AB SEB Bank calculates and pays dividends to all shareholders of the Company.

Bank details

Details of AB SEB Bankas	
Company code	112021238
Registered office address	Konstitucijos ave. 24, LT-08105 Vilnius, Lithuania
Phone	+370 5 268 2800
Email	info@seb.lt
Website	www.seb.lt

5.11. Risk management framework

The Company views risk management as a structured approach to managing uncertainties by methodically assessing the impact and likelihood of risks and applying appropriate risk management tools. In 2025, the Company followed the Risk Management Policy and Risk Management Methodology of the EPSO-G Group approved by the Board. These documents embedded a uniform risk management system that is based on common principles and meeting good practice according to COSO ERM (Committee of Sponsoring Organisations of the Treadway Commission Enterprise Risk Management) methodology applicable in the international practice. The Risk Management Policy defines the key risk management principles and responsibilities for the EPSO-G Group companies to ensure a unified corporate risk management process based on common principles. The EPSO-G Group companies define risk management principles and responsibilities in the Risk Management Policy. The Policy is publicly available on EPSO-G website.

The Company's risk appetite, as defined in the Risk Management Policy, is the level of risk that is below the highest level of risk that is equal to or greater than a score of 15 (the product of the probability and the impact of the risk on the Company), or the level of risk the Company's governing bodies willing to accept to achieve the strategy and performance objectives set. Risks exceeding the score set for the risk appetite are subject to additional management measures.

The Company has in place the following risk management process (stages):

- 1. Identification of environment.** The Company identifies aspects that may have an impact on the Company's failure to achieve its goals based on the Company's internal and external environment, planning documents, the Risk Assessment history and the monitoring of the implementation of the risk management measures. Regular environmental assessments are carried out to adapt to changes and to prepare in advance for unexpected threats.
- 2. Risk assessment.** The Company identifies, analyses and assesses risks on regular basis, identifies Key Risk Indicators, and prepares the List of Risks. The Company also identifies the risk appetite, and categorizes risks according to their priority and the appetite identified.
- 3. Developing a Plan on risk Management Measures.** The Company develops a Plan on Risk Management Measures for risks exceeding risk appetite.
- 4. Monitoring of risks and the implementation of the Plan on Risk Management Measures.** This process involves continuous monitoring of the Company's List of Risks and the Plan on Risk Management Measures, as well as monitoring of the Group-level risks and the list of the Group-level risks management measures.
- 5. Communication and information.** Regular and effective sharing of information among the participants in the Risk Management process that has impact on the assessment of the companies' risks and their management. Relevant information on risks and their management is communicated to the Company's employees during staff meetings.

The Company identified operational risks for 2025, assessed them, set risk monitoring indicators and provided risk management measures.

After assessing the risks identified and managed in the Company and their level (impact on the Company's activities), the Board of Amber Grid approved the group-level risk list.

In each quarter of 2025, the Audit Committee of EPSO-G assessed the changes in the key risk indicators of the Company, the effectiveness of risk management, and presented its conclusions and recommendations to the Boards of Amber Grid.

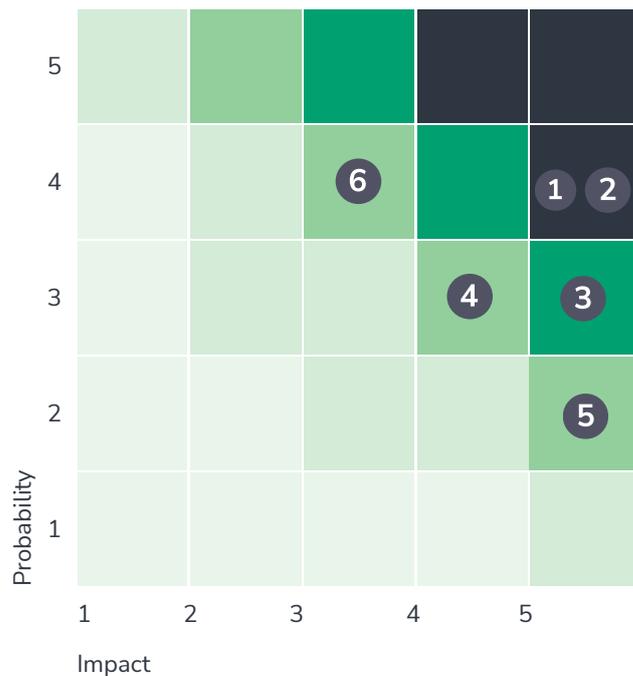
To improve risk management and integrity within the Group, Power App, the Risk Management Information System, has been installed. Using the tool, users can enter relevant risk information, depending on their role, to generate relevant content from a common dataset, and to send reminders or comments related to risk management.

5.12. Key risks and their management

Group's risk map

ASV	1	Risk of delays in strategic projects	■
	2	Risk of disruption to systems used in core business	■
ASV	3	Risk of non-compliance with occupational safety requirements	■
ASV	4	Cybersecurity risk	■
	5	Risk of failing to meet the budget	■
ASV	6	Environmental impact mitigation risk	■

ESG – environmental protection, social sphere, governance



Trends in a risk level:

- ▲ Increase
- No change
- ▼ Decrease

Risk scale:

Very high	20-25
High	15-19
Medium	10-14
Low	5-9
Very low	0-4

Full description of the Group's risks

1. Risk of delays in strategic projects



Risk level

VERY HIGH



Risk factors

External - technological
Internal - processes

Risk impact

Finances, business continuity

ESG type

Governance

Risk area

Strategy and business planning

Risk description

The Company implements complex, large-scale projects at national level included in strategic planning documents, which are crucial to the development of Lithuania's energy system, and to the availability of additional opportunities for market participants to choose to consume climate-neutral energy. Delays in government and the Company's projects have a negative impact on the achievement of the Company's and/or the Group's strategic objectives.

Management measures

- With existing measures, structural changes have been made to ensure faster development of hydrogen transport activities: a separate Energy Transformation Center has been established and cooperation on the implementation of green transformation has been maintained with national authorities (Ministry of Energy, NERC, etc.), as well as with the authorities and companies in neighbouring countries, and the European Commission.
- Planned development of the Nordic-Baltic Hydrogen Corridor, a cross-border H2 infrastructure corridor (by 2030)

2. Risk of disruption to systems used in core business



Risk level

VERY HIGH



Risk factors

External - political, technological
Internal - personnel, infrastructure

Risk impact

Finances, reputation, business continuity

ESG type

-

Risk area

Electricity and natural gas system management
Management of the assets attributed to the transmission system

Risk description

One of the key roles and responsibilities of the Company is to ensure secure, reliable, and efficient operation of natural gas and electricity transmission systems. Technological risk management aims to avoid disruptions to operations and the disconnection of gas or electricity to consumers.

Management measures

- To ensure reliable operation of transmission systems, the Company implement specialized information systems, modern business management systems, update accident and technological disruption and emergency management, business continuity plans on a continuous basis, and set high standards for the contractors.
- To avoid disruptions to the transmission systems, the systems are continuously monitored, maintenance plans are drawn up accordingly, and the necessary new investments in network upgrades are planned in time.



3. Risk of non-compliance with occupational safety requirements

Risk level

HIGH



Risk description

The Company places great emphasis on occupational safety. Given the applicable and most relevant occupational health and safety (OHS) requirements and the current implementation situation, there is a risk of non-compliance with the OHS requirements.

Management measures

- Proper installation of workstations, timely maintenance and control of systems, equipment, work tools.
- Internal documents on health and safety have been approved.
- Staff training, certification and briefings on safety and health issues.
- Continuous monitoring and supervision of employees' and contractors' compliance with OHS requirements.

Risk factors

Internal - personnel

Risk impact

Human health, finances, reputation

ESG type

Corporate Social Responsibility

Risk area

Occupational Safety



4. Cyber security risk

Risk level

MEDIUM



Risk description

The information and data managed by the Company are of strategic importance for the security of Lithuania, therefore, loss of such information or data, illegal change or disclosure, damage thereof, or termination of the data flow which is necessary for a secure operation of transmission systems may cause disturbances of the activities of the Company, cause damage to other natural persons and legal entities.

Management measures

- In order to prevent cyber incidents, threats to the information systems, physical protection and security management systems of the Company are regularly assessed, existing security measures, systems and/or tools are constantly updated and new ones are introduced to comply with the strict requirements of the EU and the Republic of Lithuania's legislation on information security.
- The Company's employees actively participate in cybersecurity exercises intended to train them to manage and respond to cyber incidents targeting critical information systems and networks, and to ensure the functioning of their services.

Risk factors

External - technological
Internal - personnel

Risk impact

Finances, reputation, business continuity

ESG type

Governance

Risk area

Information security



5. Risk of failing to meet the budget

Risk level

MEDIUM



Risk description

Management measures



Risk factors

External - economic
Internal - processes, personnel

Risk impact

Finances, reputation

ESG type

-

Risk area

Finance management

There is a risk that the Company will fail to meet their budgets and financial plans, which will adversely affect their ability to meet the commitments of specific companies and EPSO-G as the Group's, as well as ability to meet financial covenants and other obligations, and to pay dividends.

- Performance control (monitoring by EPSO-G, the Boards) as part of the Integrated Planning and Monitoring Policy.
- For the purpose of regulated activities, comments and recommendations, as appropriate, on decisions related to recognition of expenses, changes in a methodology, and development of a common Group position.
- For the purpose of non-regulated activities, review of, amendments to the action plan, where appropriate.

6. Environmental impact mitigation risk



Risk level

MEDIUM



Risk factors

Internal - processes, personnel

Risk impact

Environment, reputation, finances

ESG type

Environment protection

Risk area

Environment protection
Sustainability development

Risk description

The Company is committed to reducing GHG emissions throughout its value chain, contributing to climate change mitigation. There is a risk of failing to achieve Amber Grid's long-term strategic goal, unless the regulatory approval of the necessary investments in GHG reduction measures is obtained or the investments (measures implemented) prove to be effective.

In addition, the Methane Regulation, effective as of 2026, impose stricter requirements for methane emission monitoring (Article 12), leak detection and repair (Article 14), and controlled venting and flaring (Articles 15 and 16). This requires a sufficient number qualified specialists responsible for: measurement planning and execution (LDAR surveys), data entry, analysis and reporting to competent authorities, controlling repair and monitoring schedules, and organising work.

Management measures

- Preparation and implementation of a GHG emissions reduction plan
- Solution for GHG emission calculation software
- 2025 was a preparatory year prior to the planned entry into force of the Methane Regulation in 2026 Risks are managed using both existing and additional risk management measures. The existing measure was used to prepare the process description. Additional measures include resource planning and the procurement of services for the inventory count and measurement of methane pollution sources.

In 2025, corruption, compliance, going concern risks were included in the Company's key risk register. All of these risks are medium or low level because of applied effective risk management measures. Being aware of the importance of these risks for the achievement of the sustainability objectives, the Company pays particular attention to the management and disclosure of these risks.

06

Sustainability report



6.1. ESRS 2 General information

6.2. Environmental area

6.3. Social area

6.4. Governance area

6.5. Annexes

6. Sustainability report

6.1. ESRS 2 General information

BP-1 General basis for preparation of sustainability statements

In this section, we present sustainability information for Amber Grid (the “Company”) for the reporting year 2025.

The Report reviews our environmental, social, and governance (ESG) achievements and objectives. Information is presented in a clear and comprehensible manner, grounded in facts and data.

Following the structure specified in the first standard (1 ESRS), the sustainability report consists of five sections:

1. General information (ESRS 2 General disclosures);
2. Environmental information (E1 Climate change, E2 Pollution, E4 Biodiversity and ecosystems, E5 Resource use and circular economy);
3. Social information (S1 Own workforce, S3 Affected communities and S4 Consumers and end-users);
4. Governance information (G1 Business ethics);
5. Annexes.

This Report is not yet subject to the provisions of the Corporate Sustainability Reporting Directive (CSRD); it was developed on a voluntary basis as a transitional document to support our preparation for the future application of the CSRD. The Report is aligned with the European Sustainability Reporting Standards (ESRS).

The Company is part of the EPSO-G group of companies. Our sustainability information is included in the consolidated Sustainability Report of the EPSO-G group, prepared in accordance with ESRS and verified by an independent external auditor. This Report complements the Group report by disclosing the Company’s operational specifics and priorities.

The Report provides information on the Company’s activities and its entire value chain, from the supply chain (upstream), through its direct operations, to its relationships with customers and partners (downstream). The entire value chain was assessed using a Double Materiality Assessment (DMA). Based on its results, the Report discloses information on those parts of the value chain, impacts, risks, and opportunities that have been identified as material.

Sustainability information was selected based on materiality. The double materiality assessment was carried out at the Company level, using the EPSO-G Group methodology. Based on the results of the assessment, we have selected and compiled all the information presented in the Report.

The Report is published as part of the Integrated annual report. It is aimed at our employees, partners, decision-makers and other stakeholders. The Report helps to provide a clearer understanding of our contribution to a sustainable energy transition.

In preparing the Report, we deliberately did not make use of the non-disclosure exemptions allowed by ESRS. This is to ensure maximum transparency and consistent application of accountability principles.

BP-2 Disclosures in relation to specific circumstances

There were no specific circumstances in 2025 that had a material impact on the sustainability information presented in the Report or its comparability.

The Report is aligned with the ESRS time horizons. The short-term time horizon is up to 1 year, the medium-term time horizon is 1–5 years and the long-term time horizon is more than 5 years. These periods correspond to the practice applied in the EPSO-G group.

In addition to the information required by the ESRS, we have included tables of the European Union Taxonomy Indicators in the Report. They are based on the templates in Commission Delegated Regulation (EU) 2021/2178. The scope and methodology of the EU Taxonomy indicators have not changed significantly in 2025.

The indicators are presented on a comparative basis for the period 2023–2025. The greenhouse gas (GHG) figures are from the base year 2019. The base year was recalculated in 2024. Comparability between periods is ensured.

In 2025, the Report structure was improved to make the information clearer and more consistent. Indicators are presented more effectively, and the structure was aligned with ESRS logic. These changes had no impact on data comparability.

The methodology for calculating Scope 3 greenhouse gas emissions is presented in section E1 “Climate change.” As a member of the EPSO-G group the Company does not fall under the exemptions for companies with fewer than 750 employees. Although the Company has 368 employees, we deliberately present the full material E4, S1, S3 and S4 ESRS information for coherency and consistency with the Group's report.

Sustainability Governance

GOV-1 The role of the administrative, management and supervisory bodies

Amber Grid aims to actively contribute to the transformation of the energy sector by striking a balance between environmental, social and economic objectives. The company strives to comply with the best sustainability management practices and principles, ensuring that sustainability considerations are integrated into strategic decisions and day-to-day operations.

The composition of the administrative, management and supervisory bodies

Amber Grid's sustainability management is based on a clear allocation of responsibilities and the integration of sustainability into strategic decisions. Sustainability directions and objectives in the Company are formulated and approved by decisions of the Amber Grid Board. They are aligned with EPSO-G's strategic orientations to ensure coherence at Group level.

The Articles of Association provide for the governing bodies of the Company:

- General Meeting of Shareholders.
- The Board.
- Company CEO.

According to the legal acts of the Republic of Lithuania, the majority of the members of the Board consist of independent members and public officials. In total, the Amber Grid Board consists of 5 members elected for a 4-year term: two members delegated by the parent company EPSO-G, two independent Board members, and one public official. There are no executive members, employee representatives, or other worker representatives in the management and supervisory bodies. Detailed information about the Company's management and composition of governing bodies is provided in Sections 7 and 8 of the Integrated Annual Report and [on the Company's website](#).

EPSO-G's corporate sustainability governance structure is in line with the Group's corporate governance structure. Management, supervisory and advisory bodies oversee and manage sustainability matters by their respective areas of responsibility and competencies. Detailed information on sustainability management and monitoring at the Group level is provided in EPSO-G Integrated Annual Report 2025, section “Sustainability Governance”.

Amber Grid implements the Group's strategic sustainability objectives, prepares sustainability reports and ensures regulatory compliance. Environmental, social responsibility and governance objectives are allocated to the relevant functional units according to their responsibilities. The Company has a person responsible for the implementation of equal opportunities principles.

Sustainability governance and monitoring

Administrative, management and supervisory bodies of the Company	Key responsibilities
Amber Grid Board	<ul style="list-style-type: none"> • Approves the Company's strategy, which integrates sustainability objectives and indicators; • Approves the Company's objectives, including sustainability goals; • Periodically reviews progress on the sustainability indicators; • Reviews the Company's operational risks, including sustainability-related risks; • Receives periodic reports on the implementation of sustainability topics; • Takes decisions on the resources needed to implement sustainability initiatives.
Amber Grid CEO	<ul style="list-style-type: none"> • Ensures the implementation of strategic sustainability decisions and coordinates sustainability activities within the Company.
Company functions	<ul style="list-style-type: none"> • Coordinate and implement sustainability activities through the relevant functions and units within their respective competences.

Administrative, management and supervisory bodies of the Company	Key responsibilities
Group Sustainability Function	<ul style="list-style-type: none"> Coordinates the implementation of sustainability-related policies and reporting at Group level.

Sustainability-related knowledge and experience of governing bodies

The experience of the Company's Board members, the CEO and the management team is publicly available [on the Company's website](#).

Board members and the management team have expertise in energy, risk management and strategic planning, all of which are directly relevant to sustainability matters. Sustainability competences are strengthened through periodic reviews of sustainability indicators and the discussion of sustainability-related issues in the governing bodies.

To ensure comprehensive and integrated sustainability management, the Company is actively investing in strengthening sustainability-related knowledge, developing competencies and attracting experts.

The Company regularly organises training and presentations on sustainability topics and uses external consultancy to ensure a high level of expertise. In 2025, sustainability indicators were presented twice at the Company's quarterly management meetings. Managers are regularly briefed on sustainability policies, legislative developments and key initiatives in this area.

Sustainability education and the involvement of managers not only helps to achieve the objectives more effectively, but also strengthens their competencies by promoting a conscious and responsible approach to sustainable practices.

GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Company's governing bodies are periodically informed about material sustainability matters, including impacts, risks, and opportunities in the environmental, social, and governance areas. Sustainability matters are included on the Company's Board agenda and discussed at least twice a year. When the operational strategy and its results are reviewed annually, material impacts, risks, and opportunities are assessed, and, based on the assessment, sustainability-related objectives and actions are updated.

Sustainability matters, plans, and targets are regularly presented and reviewed by the Company's Technology and Innovation Committee (TIC), which includes all top managers and the Company's CEO.

More information on sustainability matters discussed during the reporting period at the Group's collegial bodies' meetings is provided in the EPSO-G Integrated Annual Report 2025, in the Sustainability Report section "ESRS 2 General Disclosures."

GOV-3 Integration of sustainability-related performance in incentive schemes

The Company has no separate incentive system for management bodies directly linked to sustainability indicators; however, sustainability goals are integrated into the company's annual business objectives. Managers' salary is linked to the achievement of annual goals, which also include sustainability-related commitments.

Amber Grid's remuneration policy is set out in the Integrated Annual Report, part "Report on the Implementation of the Remuneration Policy".

GOV-4 Statement on due diligence

The Company is not subject to legal requirements for comprehensive sustainability due diligence; therefore, a formalised due diligence system is not in place. The existing processes are considered adequate given the nature and scale of the Company's activities and the Group's governance model.

Nevertheless, the Company continuously assesses the potential negative impacts on the environment, people and governance in its operations and value chain. Assessment is carried out through existing management processes, aimed at identifying potential adverse impacts in a timely manner, preventing or mitigating them, and, if such impacts occur, collaborating to address them.

Despite the absence of a due diligence system, some elements of it are already applied in the Company's operations. They are coordinated by the Risk and Compliance function, in cooperation with other departments of the Company according to their

competences. Responsibilities are allocated on a functional basis, but there is no single designated person (or department) responsible.

Negative impacts are identified and assessed through a number of interrelated processes, including Double Materiality Assessment, risk management, stakeholder engagement and other topical assessments applied to the Company's operations.

The table below shows how the main aspects and steps of the due diligence process as defined in ESRS Chapter 4 are reflected in the Company's sustainability report.

Key aspects and steps of the due diligence process

Key elements of the due diligence	Parts of the sustainability report
a) Integrating due diligence into governance, strategy and business model.	GOV-1, GOV-2, GOV-3, SBM-3
b) Engagement of affected stakeholders in all key stages of due diligence.	GOV-2, SBM-2, IRO-1, MDR-P, E1, E2, E4, E5, S1, S3, S4, G1
c) Identification and assessment of negative impacts.	IRO-1, SBM-3
d) Taking action to address these negative impacts.	E1, E2, E4, E5, S1, S3, S4, G1
e) Monitoring and communicating the effectiveness of these efforts.	E1, E2, E4, E5, S1, S3, S4, G1

GOV-5 Risk management and internal controls over sustainability reporting

Sustainability-related accountability is integrated into the compliance, risk management, and internal control processes applied by Amber Grid. During internal control of sustainability reporting, risks are identified and analyzed, and appropriate attention is given to the most significant identified risks.

The Sustainability Report is coordinated by the Communication Department, which cooperates with the Occupational Safety and Environment, Finance, Administration, People and Culture, Business Resilience, Legal and other units. These units are responsible for preparing and presenting sustainability-related information within their respective competences.

Main sustainability reporting risks are related to human errors and data incompatibility. These risks are assessed when developing a sustainability report and planning control actions.

Internal control over sustainability reporting is implemented through the following key mechanisms:

- responsibilities for collecting and reporting indicators are clearly defined;
- data are reviewed and reconciled across departments;
- before being included in the sustainability report, the information is approved by management.

Information on sustainability reporting risks and their management is provided periodically to the Company's management and the Board. These bodies consider and assess the risks identified and monitor the adequacy of the control measures in place.

The reliability of the Sustainability Report and the information contained therein is the responsibility of the Company's management. The current sustainability reporting risk management and internal control system is deemed adequate. Nevertheless, it is subject to periodic review in light of changing requirements and practical experience.

Sustainability-related risks, including climate change risks, are identified, assessed, and prioritized in accordance with the Group's risk management policy and methodology, applying a unified principle for evaluating likelihood, impact, and materiality. This process is integrated into the overall risk management framework and is used in conjunction with financial, operational, compliance and other risk assessments. More detailed information about risk management is provided in the EPSO-G Integrated Annual Report 2025, Part 5 "Risk Management System".

Strategy, business model and value chain

SBM-1 Strategy, business model and value chain

Amber Grid is the operator of the Lithuanian natural gas transmission system, responsible for the transmission of natural gas to consumers and the operation, maintenance and development of infrastructure. The Company's business model contributes energy

security, ensures the reliability and stability of the transmission system and enables the transformation of the energy system. This value is important for the state, society and energy market participants.

Sustainability directions and targets

The sustainability directions and objectives are based on the Company's business model, value chain and the results of a Double Materiality Assessment. They highlight the areas where the Company's activities have the greatest impact on the environment, people, and governance, as well as areas strategically important for long-term value creation.

The updated Amber Grid strategy, aligned with the EPSO-G group companies, establishes a shared mission to accelerate energy independence and enhance system reliability. Our vision is to facilitate the green transition, while safeguarding energy and national security interests. These provisions form the basis of the Company's sustainability directions and goals.

 Environmental	 Social	 Governance
<p>In the environmental area, the Company is committed to mitigating climate change and reducing its negative impact on the environment. The key environmental priority is the transformation of the transmission system, aimed at reducing operational greenhouse gas emissions and enabling the integration of renewable energy sources, including biomethane and hydrogen. We also aim to prevent the loss of biodiversity during infrastructure development and operation.</p>	<p>In the social area, we focus on health and safety, creating a positive working environment and managing our impact on communities. The Company's operations are grounded in high occupational safety standards, continuous employee competence development, and the promotion of equal opportunities. Within the value chain, special emphasis is placed on safety during infrastructure operation and expansion, including work carried out by contractors.</p>	<p>In the governance area, the Company's priorities are to operate transparently and responsibly, manage the supply chain, and make sustainable financial decisions. The governance direction covers corruption prevention, the application of responsible procurement principles, supplier assessment, and compliance with requirements across the entire value chain.</p>



Link to objectives and progress

These sustainability directions form the basis for the Company's specific targets and metrics, which are set based on the results of the Double Materiality Assessment. Progress towards the targets for 2023–2025 is presented in the table below. Below the table, the target-setting methodology is presented. The methodology outlines the principles and processes the Company follows when defining and reviewing its sustainability targets.

Company sustainability directions and goals are integrated into the long-term strategy of the EPSO-G group. The strategy was updated in 2024. More information on the Group's strategic sustainability objectives is provided in the EPSO-G Integrated Annual Report 2025, in the Sustainability Report section "Strategy, business model, and value chain."

Key Company sustainability goals (targets) and performance results

The table below summarizes the key sustainability-related goals, their implementation results for 2023–2025, and the methodology used to set the targets. The Company's sustainability targets are defined in line with the EPSO-G group's strategic

directions, applicable international standards, and national policy provisions. Data-driven methodology is applied for formulating goals, assessing the nature of the Company's activities, stakeholders' expectations, and long-term sustainability priorities. When setting targets, stakeholders or their representatives do not participate directly; however, they have the opportunity to provide feedback – targets are set taking their input into account and aiming to address their expectations as effectively as possible.

Topic	Sub-topic	Targets	Results			Methodology for setting targets
			2025	2024	2023	
Climate change	Energy	-10% in 2025, -30% in 2026,				The targets are based on the modelling of GHG emissions carried out by EPSO-G. Emissions are calculated according to the GHG Protocol methodology. The directions are aligned with the objectives of the European Green Deal and the Paris Agreement.
	Climate change mitigation Climate change adaptation	-50 % in 2030 reduction of scope 1 and 2 GHG emissions, Net Zero by 2050.	-51%	-55%	-36%	
		Zero environmental incidents.	0	0	2	
Pollution	Air pollution	-40% in 2029, -60% in 2029 reduction in total annual air pollution emissions (CO and NO _x).	CO -26,5% NO _x -50%	CO -37% NO _x -50%	CO -30% NO _x -40%	The targets are based on national environmental requirements and the principle of prevention of negative impact.
Biodiversity and ecosystems	Land-Use Change, Fresh Water-Use Change, Sea-Use Change, Species Population Size Land degradation	Net zero biodiversity loss in new projects. ¹	In 2026–2027, it is planned to develop the metric calculation methodology and an action plan to achieve the commitment.			The commitments were approved in 2024 together with the updated Group strategy; therefore, historical and reporting year values have not been established. Targets are set in line with EU policy and preventive principles, taking into account the impact of new projects on ecosystems.
Circular economy	Waste Resource inflows, including resource use	Implementing the circular procurement model from 2035. ¹	In 2026–2027, it is planned to develop the metric calculation methodology and an action plan to achieve the commitment.			The targets are based on circular economy principles, EU policies and the drive to reduce resource consumption. The methodology for the circular procurement model will be established at the Group level in 2026–2027.
Own workforce	Diversity, equality and inclusion (incl. Gender equality and Equal pay for work of equal value;	Women in top management positions: ≥ 21% by 2027 ≥ 30% by 2035	9% ¹	9%	9%	Diversity and inclusion in the organization contribute to greater operational efficiency, higher-quality decision-making, and

Topic	Sub-topic	Targets	Results			Methodology for setting targets
			2025	2024	2023	
	Diversity; Employment, Inclusion of people with disabilities)	Diversity of age groups: percentage of employees under 30 and over 60: 10% in each group by 2028.	under 30 years – 9.51%, over 60 years – 10.64%	under 30 years – 7.25%, over 60 years – 10.72%	under 30 years – 8.12%, over 60 years – 11.59%	increased innovation potential; therefore, the Company seeks to promote women’s leadership and ensure equal opportunities for all employees. The targets are based on the principles of the UN Global Compact, the OECD Guidelines and international best practice.
		100% success rate in recruiting for the right positions.	100%	100%	N/A	The targets are set on the basis of an analysis of critical competences and replacement. Strategic positions are assessed, along with risks related to skills shortages and opportunities to ensure internal talent development and business continuity. Positions are considered critical when essential positions lack sufficient replacement capacity, i.e. there is no other employee whose competence and readiness level reaches at least 80% of the required functions.
		70% of critical positions are filled by internal candidates.	67% ²	65%	N/A	
	Training and skills development	All critical positions have at least one replacement candidate. ¹	100%	N/A	N/A	
		Zero cases where the Company’s annual targets were not achieved or were only partially achieved due to a lack of competencies or personnel.	0 cases	0 cases	0 cases	
	Health and safety	Zero serious or fatal occupational accidents involving our employees and/or contractors.	0	0	0	The targets are based on the principle of zero tolerance to incidents. Consideration is given to national security requirements, Company risk assessments, and contractor safety standards.
	Employee engagement (incl. Working hours; Work-life balance; Adequate wages)	≥ 70% high employee engagement level maintained.	75%	69%	72%	The targets are developed based on internationally recognised employee engagement assessment methodologies and the results of regular employee surveys, with the aim of maintaining a high level of engagement.

Topic	Sub-topic	Targets	Results			Methodology for setting targets
			2025	2024	2023	
	Human rights	Zero human rights violations.	0	0	0	The targets are set in line with the UN Guiding Principles on Business and Human Rights and the principle of zero tolerance for violations.
Affected communities	Water and Sanitation Land-related and security-related impacts	Zero accidents to people living close to gas infrastructure.	0	0	0	The targets are based on the activity risk profile and the need to ensure the safety of people in the vicinity of gas infrastructure. Preventive approach is applied.
Users and end users	Access to products and services; Access to (quality) information; Health and safety	≥ 80 points Global Customer Satisfaction Index (GCSI) – among the world's leading companies.	86%	90%	83%	The targets are based on the Global Customer Satisfaction Index (GCSI) and industry best practice. Consideration is given to the importance of uninterrupted gas transmission and rapid disruption response.
		Zero unplanned gas transmission disruptions; maintaining uninterrupted gas transmission and ensuring fast troubleshooting.	0	0	0	
Business ethics	Corporate culture; Corruption and bribery Protection of whistleblowers	Zero confirmed incidents of corruption.	0	0	0	The objectives are formulated in accordance with the principle of zero tolerance to corruption, in line with the legislation of the Republic of Lithuania.
	Supplier relationship management, including payment practices	100% of procurements must follow green criteria, and at least 7% of procurements must meet social criteria (from 2026, the target for socially responsible procurements is 10%).	Green 100%	Green 100%	Green 100%	The targets are set on the basis of implementing green procurement and increasing the share of socially responsible procurement, in line with the legal framework for public procurement in the Republic of Lithuania and the EU public procurement guidelines.

¹ The indicator remains stable. Its increase occurs naturally through employee turnover, which during the reporting period has not been significant enough to drive faster change.

² In 2024–2025, a positive change in the indicator was observed. The gap between the target (70%) and the actual result (67%) is attributable to employee turnover.

³ The methodology for evaluating critical positions and their backups was revised in 2025; as a result, the metrics cannot be compared with prior years. The updated methodology identifies key roles and assesses the readiness of other employees to assume these functions, with a target of ≥80% coverage. This updated assessment shows that all critical roles have at least one replacement candidate, resulting in a score of 100% in 2025.

⁴ The target has not yet been achieved (6.3%); however, we observe a steady increase in the share of socially responsible procurement from 0% in 2023. The criteria continue to be integrated into procurement processes.

The link between the business model and the value chain

The Company's business model consists of clear value chain stages: upstream (supply chain), direct activity, and downstream. The picture below shows the main parts of the supply chain, the main services provided, the resources used and the dependencies.

The business model puts climate change, energy system transformation, infrastructure and worker safety, and community impact at the heart of the Company's Sustainability matters. During the double materiality assessment, these topics were identified as material and critical – sustainability information is subsequently disclosed based on them.

Upstream

- The transmission system receives gas flows from national and cross-border interconnectors, the LNG terminal and connected biomethane producers.
- Our operations rely on technical maintenance, repair, and infrastructure development services provided by contractors.

Direct activities

- We create direct value by operating and maintaining transmission infrastructure. The Company conducts network monitoring, ensures accident prevention, and carries out development projects.
- The most material environmental, safety and social impacts and risks arise during the operation and development of the transmission infrastructure, including activities carried out by contractors. These activities drive the Company's key sustainability topics.

Downstream

- Outputs of our value chain – energy is transmitted safely and reliably to end users, gas supply companies, and the transmission systems of neighboring countries.
- At the end of the value chain, we hand over the generated waste for disposal – mostly construction and demolition waste, generated during the reconstruction of main gas pipelines.

The Company does not engage in natural gas production or trading. We operate solely as a transmission system operator. The transmission system consists of main gas pipelines, compressor stations, metering and distribution stations, corrosion protection facilities and data transmission and communication systems.

Our customers are Lithuania's enterprises and companies supplying natural gas. Detailed information on customers and services is available in Amber Grid's Integrated Annual Report 2025, section 4.

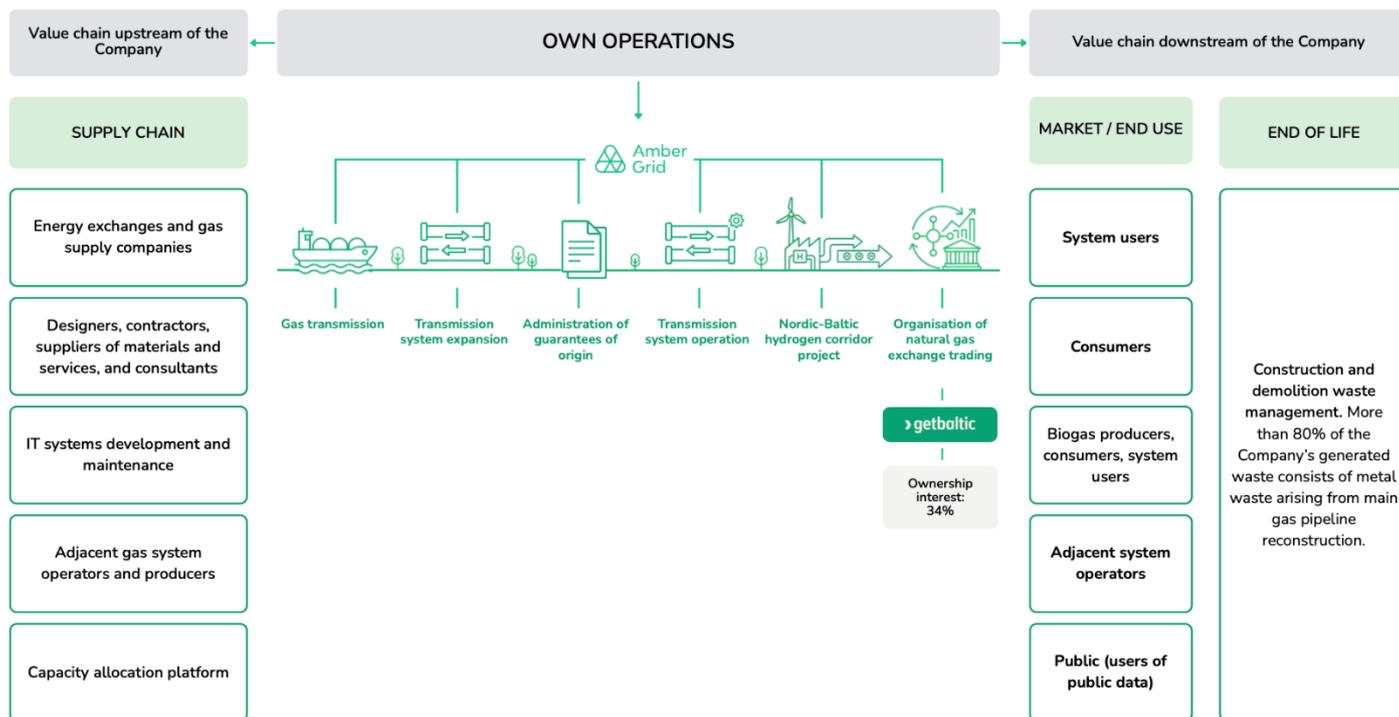
At the end of the reporting period 2025, the Company employed 368 employees. They have many years of experience in operating, maintaining and managing the transmission system.

Value chain diagram

The diagram below provides a detailed overview of the Company's value chain – from the upstream stage, covering key suppliers and resources, through Amber Grid's core operations, to the downstream stage, where value is created for customers and society. The value chain serves as the basis for identifying the impacts of the company's activities on the environment, people, and governance, and for defining sustainability directions and targets.

The diagram covers the Company's main activities, the resources used, dependencies and stakeholders involved in the value chain. The most material impacts and associated risks arise during the operation and development phases of transmission infrastructure, as well as from contractors' activities and the use of energy and other natural resources.

The impact, risk and opportunity points identified across the value chain were assessed through the Double Materiality Assessment. The results of this assessment formed the basis for identifying material sustainability topics, defining sustainability directions, and establishing specific Company goals and indicators, which are presented in the following sections of the report.



RESOURCES AND KEY DEPENDENCIES

- Energy:** gas, electricity, fuel
- Assets:** vehicle fleet, heavy equipment
- Information technology (IT):** IT systems, security systems
- Materials:** steel, concrete
- Real estate:** buildings/offices, gas pipeline infrastructure
- Purchased services:** consulting, construction and reconstruction works, security
- Natural resources:** gas, renewable energy, fuels from renewable energy sources
- Human resources:** 36% of employees work in offices, 64% in field conditions
- Financial resources:** profit from operations, sustainability-linked bonds ("EPSO-G"), loans

STAKEHOLDERS



Composition of Amber Grid

We have been in business since 2013 and became a natural gas transmission system operator in 2015. The Company is part of the state-owned energy transmission and exchange group EPSO-G. It is a member of the European Network of Transmission System Operators for Gas ENTSOG.

By October 2025, Amber Grid held 34% Of GET Baltic shares. The latter organises and develops natural gas exchange trading in Lithuania, Latvia, Estonia and Finland. GET Baltic is majority-owned by *European Energy Exchange AG* (EEX). In October 2025, Amber Grid transferred all of its shares in GET Baltic to EEX.

Information on the sector of activity

The Company operates in the fossil fuel (gas) sector, i.e., it generates revenue from the distribution of fossil fuels (as defined in Article 2 of Regulation (EU) 2018/1999 of the European Parliament and of the Council p. 62.), including transportation, storage, and trading.

The revenue arising from this activity is disclosed in the company’s financial statements. A breakdown of the revenues generated from taxonomy-aligned activities related to fossil gas is disclosed in section *EU Taxonomy Regulation Indicators*.

SBM-2 Interests and views of stakeholders

We maintain an ongoing dialogue with our stakeholders to achieve our strategic objectives and ensure sustainable operations. Stakeholders are groups whose activities have a significant impact on the Company or which may be significantly impacted by the Company.

|| The Group's long-term strategy has been developed in response to the expectations of stakeholders to enable the transformation of Lithuania's energy sector and to ensure sustainable and innovative development of the Group's companies. We continuously seek ways to enhance the involvement of our stakeholders in strategy development and other operational improvement processes. We periodically review our dialogue and information tools in response to changing expectations.

In preparing this Sustainability Report, the Company took into consideration the insights, needs and expectations of its key stakeholders. Their opinions are considered to assess impacts, risks and opportunities, and to decide on sustainability directions and targets.

The table below highlights the main stakeholder groups, their expectations, the ways in which they are engaged and how these expectations are integrated into the Company's strategy and governance. Analysis of engagement results was used in conducting the Double Materiality Assessment.

Stakeholders' expectations and emerging issues are communicated to the Company's administrative, management, and supervisory bodies as necessary. This ensures that decision-making takes into account material impacts and long-term interests.

The engagement of stakeholders in the Double Materiality Assessment process is described in more detail in the section “Double Materiality Assessment”.

Key stakeholders and ways of their engagement

Stakeholder	Key expectations	Ways in which expectations are integrated into Amber Grid: strategy and governance	Further steps
Shareholders and investors	<ul style="list-style-type: none"> Long-term, clear strategic direction of EPSO-G group and Amber Grid (safety, reliability, green course). Stable financial returns; efficient use of capital. Transparent and comparable information on GHG and methane emissions, climate risks, infrastructure resilience. 	<ul style="list-style-type: none"> The analysis of the Group's shareholder's expectations (EPSO-G strategy, Ministry of Energy's letter of expectations) has been integrated into Amber Grid's 2025–2035 strategy. The Board periodically discusses climate risks, the implementation of the methane regulation, and the progress of major projects (NBHC, CO₂ and H₂ infrastructure). Investor insights gathered from the Double Materiality Assessment are used to prioritise sustainability topics and KPIs. Updated structure of disclosed information is based on feedback from investors and lenders. 	Maintain the periodic dialogue, update information in line with changing expectations and systematically assess the feedback.
Operational supervisors and regulators (National)	<ul style="list-style-type: none"> Timely and reliable data (financial, technical, GHG, methane). 	<ul style="list-style-type: none"> The Sustainability Report provides key indicators to the regulator, showing progress on methane, GHG emission reductions and efficiency. 	Ensure consistent cooperation and timely information delivery, respond

Stakeholder	Key expectations	Ways in which expectations are integrated into Amber Grid: strategy and governance	Further steps
Energy Regulatory Council, other supervisory authorities)	<ul style="list-style-type: none"> • Transparency and predictability in tariff calculation. • Compliance with EU and national requirements (including Methane Regulation, safety, environmental standards). 	<ul style="list-style-type: none"> • Changes in tariff methodology and consultation results are used to plan investments and efficiency measures. 	to changes in the regulatory environment.
State representatives, policy makers	<ul style="list-style-type: none"> • Strengthening energy security and independence. • Progress on strategic projects. • Delivering a sustainable energy transformation. 	<ul style="list-style-type: none"> • National energy policy priorities are translated into Amber Grid's strategic objectives (infrastructure reliability, interconnections, green projects). • Participation in working groups to agree project timelines, financing models and climate targets. 	<ul style="list-style-type: none"> • Participate in institutional working groups and provide information on “Amber Grid “activities as required. • Continue providing information on the progress of key projects and on impact management measures. • Comply with public administration requirements when providing data and ensure transparent communication.
Affected communities	<ul style="list-style-type: none"> • Information about planned and ongoing projects near residential areas. • Safety; noise, pollution and traffic impact management. • Appropriate compensation and grievance handling mechanisms. 	<ul style="list-style-type: none"> • Project planning processes include mandatory communication with communities (meetings, announcements in municipalities, website). • Feedback obtained is used to optimise work schedules, routes, and temporary safety measures. 	Continue dialogue during projects and inform about planned works and impact management measures.
Public and media	<ul style="list-style-type: none"> • Understandable narrative about “Amber Grid's role in the energy system and green transformation. • Clearly presented sustainability initiatives, methane and GHG emission reduction measures. • Open, quick response to negative information or crises. 	<ul style="list-style-type: none"> • A questionnaire for the media in 2025 showed that Amber Grid's sustainability communication is mostly related to energy security and infrastructure reliability, but more specific data is needed on GHG emission reductions and social impacts. These insights have been integrated into the communication strategy. • The Sustainability Report and annual disclosures are tailored for the general public through enhanced visualizations, explanatory graphics, and storytelling. 	Maintain regular communication through channels that ensure access to the general public. Provide a clearer and more detailed presentation of ecological footprint reduction plans and their specific outcomes.
Company employees	<ul style="list-style-type: none"> • Safe working environment, clear OHS standards. • Fair pay, career opportunities, work-life balance. • Modern training programs (H₂, CO₂, IT/OT, data analytics). • An inclusive, respectful organisational culture. 	<ul style="list-style-type: none"> • The results of the Employee Engagement and Well-being Survey are directly fed into the development of the People Management Strategy and the Annual Action Plans. • During the DMA, employees expressed their priorities in a separate stakeholder group. The priorities were safety, well-being, and competences, – these topics became strategic objectives. 	<ul style="list-style-type: none"> • Conduct regular annual engagement surveys; develop and implement action plans to enhance engagement in identified areas for improvement. • Continue organising and delivering training for employees. • Implement the transparent remuneration directive. • Gradually increase remuneration in line with the Company's financial capabilities.
Labour unions	<ul style="list-style-type: none"> • Social dialogue and inclusive participation in addressing 	<ul style="list-style-type: none"> • Labour unions are involved in changes to OSH, pay and work organisation; they are consulted in the preparation of collective 	Continue consulting and social dialogue as needed.

Stakeholder	Key expectations	Ways in which expectations are integrated into Amber Grid: strategy and governance	Further steps
	employee and OHS-related matters. <ul style="list-style-type: none"> • Transparent, collectively bargained commitments. 	agreements and important internal documents.	
Suppliers and suppliers' representatives (other than construction contractors)	<ul style="list-style-type: none"> • Clear procurement criteria and conditions, transparency. • Preparing and publishing procurement plans. • Proportionate and understandable application of sustainability requirements. 	<ul style="list-style-type: none"> • Insights from supplier surveys and consultations are applied to update procurement documentation and contractual terms. • Socially responsible procurement criteria (safety, environmental protection, working conditions) are integrated into policies and linked to sustainability goals. 	Maintain communication and keep up-to-date on relevant procurement developments.
Contractors (construction, repair, services)	<ul style="list-style-type: none"> • Uniform, clear OHS standards, clearly defined responsibilities. • Smooth, timely communication of work plans and changes. 	<ul style="list-style-type: none"> • Contractors' safety performance is included in Amber Grid's KPIs. • Contractor incident analysis is used to update safety requirements and control procedures. 	Continue cooperation, clarify requirements and perform consistent monitoring.
B2B customers (suppliers, traders, DC operators, large consumers)	<ul style="list-style-type: none"> • Reliable capacity allocation and clear capacity planning. • Digital services, fast response to queries. • Transparent information on tariffs, connection and repair plans. 	<ul style="list-style-type: none"> • Customer feedback is used to improve capacity planning and customer service processes. 	Maintain a regular dialogue and keep informed about developments in infrastructure and capacity.
International partners (ENTSOG, TSOs in other countries, market operators)	<ul style="list-style-type: none"> • Coordination, technical compatibility of high-pressure network infrastructure. • Seamless data and capacity coordination, gas flow management, crisis coordination. 	<ul style="list-style-type: none"> • Common scenarios and best practices are used to inform Amber Grid's investment planning and sustainability measures. 	Participate in joint working groups and share information in line with international schedule.

Double Materiality Assessment

SBM-3, IRO-1 Material impacts, risks and opportunities and their interaction with strategy and business model – description of the processes to identify and assess material impacts, risks and opportunities

In line with the EU Corporate Sustainability Reporting Directive (CSRD), Amber Grid conducted an independent Double Materiality Assessment at the Company level in 2025. The assessment was carried out at the EPSO-G group level in 2024 and was reviewed and further detailed in 2025 to reflect the specific nature of the Company's operations. It was tailored to the specific features of Company's operations, infrastructure, and value chain, separately from the Group's consolidated assessment.

The assessment identified and evaluated material impacts on the environment and society, as well as potential risks and opportunities that may have a financial impact on the Company. The assessment was undertaken in accordance with the European Sustainability Reporting Standards (ESRS) and EFRAG's implementation guidelines.

It was conducted by the Company's management, heads of departments and responsible employees, in consultation with external experts.

The Double Materiality Assessment was carried out in three main steps:

1. Setting the context and scope of the assessment

In the first step, we defined the scope of the assessment, taking into account the Company's business areas, business model, value chain and key stakeholders. We developed value chain and stakeholder maps, which served as the basis for the impact and financial materiality assessment.

Stakeholders were identified in accordance with ESRS classification, distinguishing between:

- Affected stakeholders;
- Users of sustainability information.

The assessment used three time horizons:

- short-term – up to 1 year,
- medium-term – from 1 to 5 years,
- long-term – more than 5 years.

Stakeholder engagement in the double materiality assessment

Location in the value chain	Stakeholder	Ways of engagement in the DMA process	Engagement results (relevant sustainability topics and expectations)
Comprehensive materiality	Shareholder, regulator	<ul style="list-style-type: none"> • Analysis of shareholder expectations; • Regulatory review and qualitative questions submitted in writing to the Company representative responsible for relations with the regulator. 	Sustainable, climate-neutral operations; clear commitments and progress; infrastructure development for climate-neutral energy; compliance with legislation; operational transparency; regulatory requirements and audit results.
	Media	Questions in writing to Amber Grid representative of the Communications Unit.	Sustainability initiatives and progress; carbon footprint reduction; integration of renewable gases (especially biomethane); energy efficiency; transparent and clear information on projects and environmental impacts.
	Associations	Analysis of Amber Grid's current associations and their key documents.	Clean energy and decarbonisation; hydrogen integration and supply efficiency; cross-sectoral integration of the energy system; contribution to EU energy and climate policy.
	Affected communities	Questions in writing to Amber Grid representative, responsible for working with communities.	Clear communication about projects; public consultation; mitigation of impacts (noise, traffic, construction); work planning in line with local needs; considering community feedback and expectations.
	Nature (silent stakeholder)	Analysis of regulations, scientific articles, internal company documents and other sources.	All environmentally material topics.
Company activities	Employees	<ul style="list-style-type: none"> • Overview of the results of the Employee Engagement Survey 2024; • Written questions to the Labour Union and the Employee Representative. 	Fair pay; work/leisure balance; clear working conditions and workload; career opportunities; flexible working hours; fringe benefits and collective agreement; training and skills development.
Supply chain	Suppliers	Document analysis: publicly available information from major suppliers, reports.	Occupational health and safety in contracting; environmental commitments; climate impact reduction; adherence to work practices and sustainability principles.
End users	Customers (B2B)	Document analysis – publicly available information and reports of Amber Grid's key customers.	Sustainable energy and CO ₂ reduction; environmental and governance standards; plans for CO ₂ transport and storage; safe and secure gas supply (including LNG).

2. Preliminary assessment – Identification of potentially material sustainability issues

In the second step, we carried out a pre-assessment to identify potentially relevant sustainability matters. The assessment was based on the topics and sub-topics of ESRS 1, Annex A.

We used the following sources of information:

- The results of internal company questionnaires;
- publicly available industry and stakeholders information;
- independent research;
- the relevant regulatory context, including the objectives of the European Green Deal.

Our assessment took into account the characteristics of the Company's value chain, including its operations in sensitive areas and its dependence on critical suppliers and service providers.

3. Materiality assessment

In the third step, we assessed the impact and financial materiality. We assessed the impact materiality for both actual and potential impacts using the following criteria:

- scale,
- scope,
- irreparability,
- likelihood (for potential impacts).

For human rights-related cases, materiality was evaluated according to the severity of the impact, irrespective of its likelihood. Stakeholder engagement at this stage was carried out in line with the principles of the AA1000 *Stakeholder Engagement Standard*.

The financial materiality was evaluated considering both the potential impact magnitude and likelihood, applying the EPSO-G Group's risk assessment methodology tailored to Amber Grid's operational context. Where possible, financial impacts were assessed quantitatively; in other cases, expert judgment was applied.

Identification of material topics

The final list of material topics was drawn up by assessing each topic in terms of impact and financial significance. A topic was considered material if:

- At least one dimension of materiality was rated as critical;
- Both dimensions were rated as material;
- The topic was of strategic importance to the Company's operations.

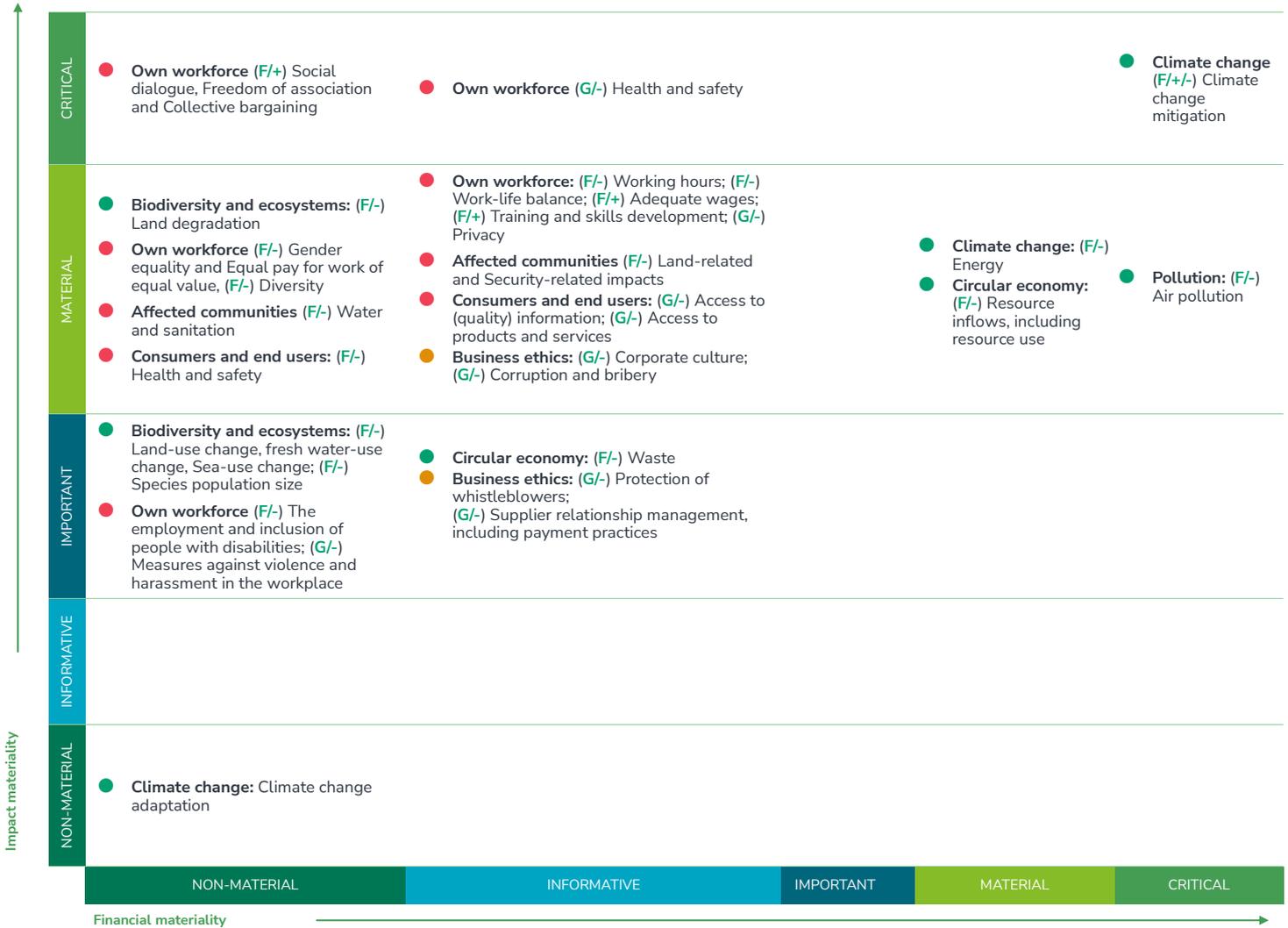
This ensured that the final list of topics reflects not only the quantitative assessment results but also the Company's strategic priorities and stakeholder expectations.

Double materiality matrix

The Double Materiality Matrix presents the environmental, social, and governance topics material to the Company. The vertical axis represents impact materiality, while the horizontal axis represents financial materiality.

Although climate change adaptation appears as less material in the Matrix, the topic has been included in the list of material topics in consideration of the Company's strategic priorities and the conducted climate risk assessment.

Amber Grid double materiality matrix



- Environmental area
- Governance
- Social area
- F Actual impact
- G Potential impact
- + Positive impact
- Negative impact

The table below summarises the total number of significant impacts, risks and opportunities (IRO), as identified in the Double Materiality Assessment. Each IRO is described in terms of its nature, its location in the value chain and its time horizon, and is linked to the Company’s strategy and business model, including how the Company addresses and manages these aspects. The table presents concise descriptions only; detailed accounts of the management of material sustainability topics are provided in subsequent sections of the report, organised by individual topics.

Subtopic	Impacts, risks and opportunities	Location of the value chain	Time horizon of occurrence ¹	Link to strategy and business model / management principles	
E1 Climate Change					
Climate change mitigation	 Actual positive impact	Transforming the natural gas system for the safe transport of renewable energy sources (contributing to climate change mitigation and green energy development).	Direct activities	The impact has already materialised.	The basis for the company's long-term strategy.
	 Actual negative impact	GHG emissions, mainly due to methane leakage during gas transport (increasing the Company's negative climate impact).	The whole value chain	The impact has already materialised.	Arises from the business model (business as usual). The company undertakes to comply with the objectives of the EU Green Deal and the Paris Agreement. The Company's strategy includes GHG reduction and Net Zero targets, the status of which is assessed annually. Implementation of GHG mitigation action plan.
	 Risks	In implementing the requirements of the EU Methane Regulation, significant investments in technological solutions may be required, even if they do not yield a rapid return on investment.	Direct activities	Long-term	The Company aims to implement the requirements of the EU Methane Regulation, which includes carrying out measurements, preparing and submitting reports, and implementing risk management measures.
Energy	 Actual negative impact	The production of materials such as steel or cement requires large amounts of energy (increasing the Company's indirect environmental impact).	Upstream	The impact has already materialised.	Arises from the business model (business as usual). The Group will aim to achieve its established objective of transitioning to circular procurement by 2035 (with the action plan scheduled to be developed in 2026–2027).
	 Actual negative impact	Energy consumption in the operation of the gas transmission system (increasing the Company's environmental impact).	Direct activities	The impact has already materialised.	Arises from the business model (business as usual). Implementation of GHG mitigation action plan.
	 Risks	Changes in EU legislation and the related environmental taxes (which may require the implementation of new technologies, potentially leading to a significant increase in the Company's operating costs).	Direct activities	Long-term	Implementation of GHG mitigation action plan. During the implementation of investment projects, all technological alternatives are assessed, with the most economically advantageous option selected. Planned investments and the ongoing modernisation projects of the Jauniūnai and Panevėžys gas compressor stations (GCS).

Subtopic	Impacts, risks and opportunities		Location of the value chain	Time horizon of occurrence ¹	Link to strategy and business model / management principles
Climate change adaptation	 Risks	Extreme weather events and long-term temperature changes, which may necessitate additional investments in resilient infrastructure and more frequent maintenance, thereby increasing costs.	Direct activities	Short-term	Infrastructure condition diagnosis is periodically performed, based on which a plan of reconstruction works for the infrastructure is developed. Continuous market research is conducted to identify and test new, more durable and economically viable materials that could be used in operations.
E2 Pollution					
Air pollution	 Actual negative impact	Air pollutant emissions from fuel combustion plants (compressors, boilers, generators) emitting NOx, CO and other pollutants that affect air quality.	Direct activities	The impact has already materialised.	Arises from the business model (business as usual). A GHG emissions reduction action plan is being implemented, with the measures set out therein also contributing to the reduction of NOx and CO emissions. Compliance with environmental requirements is ensured, with ongoing monitoring of air pollution sources.
E4 Biodiversity and ecosystems					
Land-use changes	 Actual negative impact	The use of primary, non-renewable raw materials in infrastructure construction, linked to the environmental impacts of raw material extraction.	Upstream	The impact has already materialised.	Arises from the business model (business as usual). The Company will pursue a Group-level goal of transitioning to circular procurement by 2035, with the action plan scheduled for development in 2026–2027.
	 Actual negative impact	Changes in land structure and use due to pipeline construction (requiring excavation works that impact land and territories).	Direct activities	The impact has already materialised.	Arises from the business model (business as usual). The Company will pursue a Group-level goal of achieving no net loss of biodiversity, with the action plan scheduled for development in 2026–2027.
	 Risks	Ecosystem disturbance during infrastructure development (may require implementation of biodiversity restoration measures, which could increase project costs).	Direct activities	Short-term	Arises from the business model (business as usual). The Company is committed to achieving the Group-level target of zero net biodiversity loss. The necessity of restoration measures will be determined during each individual project and will depend on the specific location.
Species population size	 Actual negative impact	Fragmentation of ecosystems and habitats due to the pipeline network, potentially affecting species population sizes.	Direct activities	The impact has already materialised.	Arises from the business model (business as usual). The Company is committed to achieving the Group-level target of zero net biodiversity loss.
	 Risks	Implementation of legal requirements, including Environmental Impact Assessment (EIA) procedures and taxes (may	Direct activities	Medium-term	Continuous monitoring of environmental legislation and the impact of changed requirements on the Company's operations. During the investment project, it is also assessed whether a SEA screening or EIA will be required, and

Subtopic	Impacts, risks and opportunities		Location of the value chain	Time horizon of occurrence ¹	Link to strategy and business model / management principles
		increase project costs and extend timelines).			consultations with the relevant authorities are conducted prior to project implementation.
Land degradation	 Actual negative impact	Compaction of soil and mixing of soil horizons (layers) during pipeline installation and maintenance.	Direct activities	The impact has already materialised.	Arises from the business model (business as usual). The Company is committed to achieving the Group-level target of zero net biodiversity loss.
	 Risks	Soil changes and erosion, which may require additional investment in slope stabilization measures for infrastructure development.	Direct activities	Medium-term	Arises from the business model (business as usual). The Company is committed to achieving the Group-level target of zero net biodiversity loss. The need for stabilization measures is assessed for each individual project based on local conditions, and, where necessary, can also be determined through post-construction monitoring.
E5 Resource use and circular economy					
Resource inflows	 Actual negative impact	High demand for equipment and raw materials required for gas transmission infrastructure, resulting in environmental impacts.	Upstream and direct activities	The impact has already materialised.	Arises from the business model (business as usual). The Company will pursue a Group-level goal of transitioning to circular procurement by 2035, with the action plan scheduled for development in 2026–2027. There is a continuous effort to source raw materials and equipment made from more environmentally friendly, recycled materials that meet standards requirements and are available at economically viable prices.
	 Risks	Price increases in resources such as steel and metals, leading to higher infrastructure project costs.	Direct activities	Long-term	
Waste	 Actual negative impact	Generation of waste and hazardous waste from direct activities.	Direct activities	The impact has already materialised.	Arises from the business model (business as usual). Implementation of the Group's Environmental Policy. The Company commits to applying pollution prevention principles, reducing waste volumes, and ensuring the safe and responsible management of waste.
	 Risks	Although small waste volumes and recycling opportunities can reduce risks and create a positive impact (with a large share of waste being directed to recycling), non-recyclable waste is still generated.	Direct activities	Short-term	The Company will pursue a Group-level goal of transitioning to circular procurement by 2035, with the action plan scheduled for development in 2026–2027. There is a continuous effort to source raw materials and equipment made from more environmentally friendly, recycled materials that meet standards requirements and are available at economically viable prices. Efforts are made to purchase products with recyclable packaging, aiming to increase recycling potential through proper sorting and agreements with

Subtopic	Impacts, risks and opportunities		Location of the value chain	Time horizon of occurrence ¹	Link to strategy and business model / management principles
					waste management companies focused on recycling.
S1 Own workforce					
Working hours; work-life balance	⊖ Actual negative impact	High workload, shift work, and on-call duties, particularly in technical positions, may affect employee well-being and work-life balance.	Direct activities	The impact has already materialised.	The Company's HR management practices focus on employee well-being, diversity and equality of opportunity, favourable working conditions (including a healthy work-rest balance).
	⚠ Risks	Employee turnover due to poor work-life balance (which may lead to project delays, additional costs, and potential reputational damage for the Company).	Direct activities	Short-term	
Adequate wages	⊕ Actual positive impact	Transparent and fair remuneration system, above the minimum wage, published average salaries.	Direct activities	The impact has already materialised.	An essential part of the Company's HR practices and strategy.
	⚠ Risks	Rising demand for energy sector employees may necessitate higher salaries, thereby increasing costs for talent attraction and retention, raising operational expenditures, and potentially reducing profitability.	Direct activities	Short-term	The company applies a transparent remuneration system and follows a unified Remuneration, Performance Evaluation, and Development policy.
Social dialogue, freedom of association and collective bargaining	⊕ Actual positive impact	Collective agreements, labour unions, and open communication enhance employee engagement.	Direct activities	The impact has already materialised.	An essential part of the Company's HR practices and strategy.
	⚠ Risks	Insufficient social dialogue (may lead to disputes, increase employee turnover, delay projects, pose financing risks).	Direct activities	Medium-term	The Company's HR management practices effectively implement measures to promote and ensure social dialogue, managing the associated risk.

Subtopic	Impacts, risks and opportunities		Location of the value chain	Time horizon of occurrence ¹	Link to strategy and business model / management principles
Health and safety	 Possible negative impact	Accidents at facilities may harm employee health and the Company's reputation.	Direct activities	Medium-term	Arises from the business model (business as usual). The Company aims to achieve the Group-level target of zero accidents.
	 Risks	Non-compliance with safety and health requirements may result in sanctions due to workplace accidents, increase insurance costs, and damage the Company's reputation.	Direct activities	Short-term	The risk is related to the Company's strategic objective of ensuring compliance with legal requirements, creating a safe working environment, and conducting operations reliably. Failure to comply with safety and health requirements may result in sanctions and financial losses, as well as damage the Company's reputation. Therefore, risk management is based on ensuring compliance, prevention, management accountability, and the continuous strengthening of safety culture as an integral part of the business model.
Training and skills development	 Actual positive impact	Access to training and development programs enhances employee skills and engagement.	Direct activities	The impact has already materialised.	An essential part of the Company's HR practices and strategy. The corporate culture at Amber Grid, focused on equal opportunities for skills development, enhances attractiveness to top talent and helps retain them. This not only contributes to the Company's long-term competitiveness but also ensures the availability of qualified specialists capable of achieving strategic objectives and ensuring project success.
	 Opportunity	Competency development initiatives (e.g., collaboration with EMNIM??) help retain specialists and reduce the need for new hires.	Direct activities	Short-term	
Gender equality and equal pay for work of equal value	 Actual negative impact	Gender imbalance and disparities in remuneration between men and women in equivalent positions.	Direct activities	The impact has already materialised.	The Group-level Diversity and Inclusion Strategy is implemented to prevent related risks and generate positive impact.
	 Risks	Violations of equal opportunities can harm the Company's reputation, increase employee turnover, and result in lawsuits.	Direct activities	Short-term	The Group's Remuneration Policy is applied to ensure transparency, fairness, and equal accessibility of remuneration for all employees, irrespective of personal characteristics or social attributes.
Employment and inclusion of people with disabilities	 Actual negative impact	Limited inclusion of people with disabilities in the Company.	Direct activities	The impact has already materialised.	The Group-level Diversity and Inclusion Strategy is implemented to increase the representation of persons with disabilities within the Company.
	 Opportunity	By promoting inclusion and diversity, the Company can enhance its reputation, increase employee engagement, and reduce recruitment costs.	Direct activities	Short-term	

Subtopic	Impacts, risks and opportunities		Location of the value chain	Time horizon of occurrence ¹	Link to strategy and business model / management principles
Diversity	 Actual negative impact	Gender imbalance and disparities in remuneration observed in some positions.	Direct activities	The impact has already materialised.	Gender imbalance arises due to sector-specific factors. The Group-level Diversity and Inclusion Strategy is implemented to prevent related risks and generate positive impact.
	 Risks	A lack of diversity may result in skills and talent gaps, making project implementation more challenging.	Direct activities	Short-term	
Measures to combat violence and harassment in the workplace	 Possible negative impact	Gender imbalance and potential instances of inappropriate behaviour may negatively impact employees' emotional well-being and retention.	Direct activities	Short-term	The Group-level Diversity and Inclusion Strategy is implemented to prevent related risks and generate positive impact.
Privacy	 Possible negative impact	Improper handling of personal data or cybersecurity breaches may violate employees' rights.	Direct activities	Short-term	The Company complies with the requirements set out in the General Data Protection Regulation and consistently strengthens its personal data protection management.
	 Risks	Financial risk of personal data breaches (which may result in substantial fines and claims from data subjects for compensation).	Direct activities	Medium-term	

S3 Affected communities

Land and security related impacts	 Actual negative impact	Direct activities (construction, maintenance) have an impact on communities: noise, vibration, dust, traffic restrictions, etc.	Direct activities	The impact has already materialised.	Arises from the business model (business as usual). Within the Company, impacts on local communities and related risks are managed on a project-by-project basis, taking into account specific circumstances and in compliance with the EPSO-G Code of Ethics.
	 Risks	Management and compensation of negative impact on communities (may require damage compensation and technological investments).	Direct activities	Long-term	
	 Risks	Cyber-attacks, infrastructure failures, and accidents can result in financial losses and damage the Company's reputation.	Direct activities	Long-term	The Company continuously assesses potential risks and has prepared an Emergency Management Plan and a Security Plan covering physical, cyber, and operational security measures.

S4 Consumers and end users

Subtopic	Impacts, risks and opportunities		Location of the value chain	Time horizon of occurrence ¹	Link to strategy and business model / management principles
Access to (quality) information	 Possible negative impact	Outdated or unavailable information on services can have a negative impact on consumers.	Direct activities	Short-term	Arises from the business model (the Company is responsible for the availability of information and its impact on direct customers and end users). The Company consistently manages this aspect through its long-term strategy and implementation of legislation.
	 Risks	Failure to provide necessary information to the public or stakeholders may result in claims and fines against the Company.	Direct activities	Medium-term	
Access to products and services	 Possible negative impact	In peripheral areas, inadequate infrastructure, system disruptions or fluctuations in gas prices can affect consumer access to services.	Downstream	Short-term	Arises from the business model (the Company is committed to organizing its operations to ensure continuous and stable service delivery to customers and end users). Potential adverse impacts and risks are managed through a long-term strategy and compliance with legislation.
	 Risks	Energy transmission disruptions may lead to infrastructure restoration costs and potential claims.	Direct activities	Short-term	
G1 Business ethics					
Corporate culture	 Possible negative impact	Failure to adhere to transparency, accountability, ethics, or inclusivity principles can have a negative impact on employees and stakeholders.	The whole value chain	Short-term	The Company actively promotes business ethics and fosters a responsible organizational culture, based on Group-level approved policy documents. The risk is managed through the consistent implementation and strengthening of the Company's best sustainability management practices.
	 Risks	Failure to implement sustainability policies and comply with legislation may negatively affect investors, financing, and the Company's value.	Direct activities	Medium-term	
Protection of whistleblowers	 Possible negative impact	An ineffective whistleblower protection system can lead to breaches of confidentiality, discrimination and undermine trust in the Company.	The whole value chain	Short-term	The Company complies with the Whistleblower Protection Act and ensures effective whistleblower protection.
	 Risks	Failure to comply with whistleblower protection requirements may significantly damage the Company's reputation.	Direct activities	Medium-term	
Supplier relationship management, including payment practices	 Possible negative impact	In very rare cases, supplier non-compliance may cause project delays or stoppages, or may require terminating the collaboration entirely.	Direct activities and upstream value chain	Short-term	The procurement process incorporates a contract performance and control mechanism that enables monitoring of supplier activities, evaluation of their

Subtopic	Impacts, risks and opportunities		Location of the value chain	Time horizon of occurrence ¹	Link to strategy and business model / management principles
	 Risks	Selecting an unreliable supplier (inefficient procurement may lead to additional costs and project delays).	Direct activities	Medium-term	capacity to meet contractual obligations, and timely detection of potential issues.
Corruption and bribery	 Possible negative impact	Corrupt or unethical behaviour can infringe the rights of stakeholders.	Direct activities	Short-term	The Company has implemented the ISO 37001:2016 Anti-Corruption Management System.
	 Risks	The reputational risk associated with corruption and bribery may lead to financial losses, disruption of projects, and diminished trust in the Company.	Direct activities	Medium-term	

Note: Materiality time horizon: short-term – up to 1 year; medium-term – 2–5 years; long-term – more than 5 years.

Financial impact of significant sustainability topics

The sustainability-related risks and opportunities had no impact on the Company's financial position, business results, or cash flows. No risks or opportunities have been identified that are expected to have a significant impact on the Company's asset or liability balances in the near term. The resilience of the Company's strategy and business model in addressing material impacts, risks, and opportunities was assessed during the Double Materiality Assessment and the climate risk assessment. No separate analysis of strategy and business model resilience was conducted.

IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The Sustainability Report was prepared in accordance with the ESRS disclosure requirements identified as applicable to the Company based on the Double Materiality Assessment results.

The list of ESRS disclosure requirements followed in preparing this report is presented in the section "ESRS Index." This section also specifies all data units required under other EU legislation listed in the ESRS, Appendix B.

Climate change is a material topic for the Company. The scope and content of the information to be disclosed were determined based on the results of the Double Materiality Assessment.

MDR Minimum Disclosure Requirements

We apply the ESRS Minimum Disclosure Requirements (MDRs) when preparing our Sustainability Report. We disclose information on policies (MDR-P), actions (MDR-A), metrics (MDR-M) and targets (MDR-T).

These Minimum Disclosure Requirements are presented alongside the relevant topical ESRS disclosures in the subsequent sections of the report and form their structural basis.

MDR-P Policies adopted for the management of material sustainability matters

The table below provides an overview of the key policies applied within the Group. They are applied directly within the Company's operations. Where relevant, they also cover partners, suppliers, and other stakeholders affected by the Company's activities. This ensures consistent application of sustainability principles across the Company's operational environment.

The implementation of the policies is the responsibility of the Company's CEO. At the Group level, policies are developed or reviewed with consideration of the interests and views of key stakeholders. Internationally recognized tools and (or) guidelines are also used to support this process. Detailed information about operational policies is provided in the EPSO-G website, section "Operating Policies".

Policy	Policy description	Linkage with internationally recognised tools and/or guidelines	Link to the ESRS sustainability topic
Supplier Code of Conduct (SCoC)	The policy defines minimum standards of conduct. These are the basic conduct norms	UN Universal Declaration of Human Rights;	G1 Management of relationships with suppliers;

Policy	Policy description	Linkage with internationally recognised tools and/or guidelines	Link to the ESRS sustainability topic
	expected from all partners of the EPSO-G group companies. This promotes lawful, professional, sustainable, and fair business practices, covering principles of environmental protection, climate neutrality, human rights, labor standards, and business ethics.	International Labour Organization Conventions; UN Aarhus Convention; UN Global Compact; UN Convention against Corruption.	E1 Climate change; E5 Resource use and circular economy; S3 Affected communities.
Sustainability Policy	The Policy outlines the Group's overarching sustainability principles that guide the development of the Group's corporate activities and foster a progressive organisational culture.	UN Global Compact; UN Framework Convention on Climate Change.	E1 Climate change; S3 Affected communities; E2 Pollution.
Code of Conduct	The Code sets out the ethical principles and standards followed by EPSO-G group companies in carrying out their operations and maintaining relations with the shareholder, the public, business partners, and other stakeholders. The Code is followed in daily operations by employees of the Group companies, members of collegial bodies, and other individuals acting on behalf of the Group. The principles set out in the Code are intended to become an integral part of the work culture and to be consistently applied in line with the Group's strategies and values.	-	G1 Business ethics; S4 Consumers and end-users.
Environmental policy	The policy sets out the key environmental principles applied by the Group, aimed at reducing the environmental impact of its operations and promoting a culture based on sustainable development principles within the Group and its surrounding environment.	UN Framework Convention on Climate Change; EU Green Deal; UN Agenda for Sustainable Development.	E1 Climate change; E4 Biodiversity and ecosystems; E2 Pollution; S3 Affected communities.
Policy on support and humanitarian aid	The policy sets out the key principles for providing support and (or) humanitarian aid, the essential criteria, and the requirements to ensure the transparency and accountability of the assistance provided.	-	S3 Affected communities.
Anti-corruption policy	The policy defines the principles, responsibilities, and measures for anti-corruption activities applied within the Group, aimed at creating a corruption-resistant environment.	ISO 37001:2016 Anti-bribery management systems. Requirements with guidance for use.	G1 Business ethics; G1 Corruption and bribery.
Employee remuneration, performance management and development policy	The policy establishes clear and transparent principles for employee compensation and performance evaluation, a compensation system based on these principles, as well as guidelines for employee development, skills enhancement, and professional growth.	-	S1 Own workforce.
Occupational health and safety policy	The policy defines the Group's fundamental principles for occupational health and safety and provides guidelines for their implementation, aimed at protecting employees' well-being and creating a safe, healthy, and productive work environment.	ISO 45001 – Occupational health and safety management systems: requirements with guidance for use	S1 Own workforce.
Equal opportunities policy	The Policy defines the key principles applicable across the Group's companies to ensure compliance with the principles of equal	UN Agenda for Sustainable Development.	S1 Own workforce.

Policy	Policy description	Linkage with internationally recognised tools and/or guidelines	Link to the ESRS sustainability topic
	opportunities and non-discrimination in all areas of employment relationships.		
Procurement policy	The Policy sets out the unified principles governing the Group’s procurement, strategic planning, coordination, contract performance, and oversight.	-	G1 Management of relationships with suppliers.

6.2. Environmental area

E1 Climate change

The Company’s activities include the development and operation of energy infrastructure and therefore have both positive and negative impacts on the climate. Given its role in the transformation of the energy system, the Company considers climate change as a priority area and integrates GHG emission reduction and climate change adaptation aspects into its long-term business planning. Based on the results of the Double Materiality Assessment, climate change mitigation, energy, and climate change adaptation have been identified as material topics due to generated emissions, energy consumption, as well as physical and transition risks. An overview of the actual positive and negative impacts and associated risks in these areas is given below.

Impacts, risks and opportunities

Sub-topic: Climate change mitigation		
	Actual positive impact	Transforming the natural gas system for the safe transport of renewable energy sources (contributing to climate change mitigation and green energy development).
	Actual negative impact	GHG emissions, mainly due to methane leakage during gas transport.
	Risk	In implementing the requirements of the EU Methane Regulation, significant investments in technological solutions may be required, even if they do not yield a rapid return on investment.
Sub-topic: Energy		
	Actual negative impact	The production of materials such as steel or cement requires large amounts of energy (increasing the Company’s indirect environmental impact).
	Actual negative impact	Energy consumption in gas transmission system operation.
	Risk	Changes in EU legislation and the related environmental taxes (which may require the implementation of new technologies, potentially leading to a significant increase in the Company’s operating costs).
Sub-topic: Climate change adaptation		
	Risk	Extreme weather events and long-term temperature changes, which may necessitate additional investments in resilient infrastructure and more frequent maintenance, thereby increasing costs.

E1-1 Transition plan for climate change mitigation

The overall direction of Amber Grid’s transition plan is to consistently reduce GHG emissions generated by the Company’s operations while transforming the gas transmission system to ensure its compatibility with a green energy future.

We are committed to contributing to climate change mitigation and the transformation of the energy sector, guided by the Paris Agreement and the National Energy Independence Strategy. At the beginning of 2025, the Board approved an updated long-term strategy through 2035, which sets targets that support the achievement of the Company’s climate and sustainability objectives.

Strategic objectives and steps to mitigate climate change:



Improving energy efficiency across all production processes: implementing new technologies and optimising energy consumption in order to reduce direct and indirect greenhouse gas (GHG) emissions (Scope 1 and Scope 2) **by 30% by 2026** and **by 50% by 2030** (compared to the 2019 base year). The GHG emission reduction targets are disclosed in accordance with Disclosure Requirement E1-4.



Development of renewable energy sources (RES) in technological processes. In the future, the Company plans to use green hydrogen (H₂) and biogas for its operations in order to reduce the use of fossil fuels, minimise its negative environmental impact, and increase the consumption of clean energy.



Transformation of the natural gas system and integration into the European market. The natural gas system is set to be radically transformed by 2050 to transport renewable gas and H₂. The Company aims to integrate into the single European energy market, ensuring clean energy for consumers and helping the state comply with the European Green Deal.



Enabling Green Transformation. In line with the changes envisaged by the State in the National Energy Strategy, the Company aims to foster the enabling environment for stakeholders. The Company will undertake the following actions:

- develop hydrogen (H₂) transportation infrastructure, thereby contributing to the creation of an ecosystem for carbon dioxide (CO₂) capture, transport, storage, and utilization;
- create favourable conditions for green gas producers to access the gas transmission system.

Integrating the Transition Plan into strategy and financial planning

The Transition Plan is an integral part of the Company's strategy and long-term investment plan. Approximately EUR 103.69 million is planned to be allocated for the implementation of GHG emission reduction measures in 2025–2030 (excluding other strategic projects).

The annual budget is prepared each year in line with strategic priorities and investments. The following priorities have been set for 2025–2027 in the operational plan approved by the Board:

- building the infrastructure for reliable clean energy supply;
- ensuring energy and national security;
- strengthening the Company's role for clients – being a trusted strategic partner in the energy transformation.

The Board regularly assesses the progress of the plan's implementation and updates strategic documents in response to changes in the operating environment.

For detailed information on the Amber Grid strategy, see [„EPSO-G“ group strategy 2035. „Amber Grid“](#).

GHG mitigation action plan

To contribute to climate change mitigation goals, Amber Grid consistently implements its GHG Mitigation Action Plan (GHG MAP).

The main decarbonization levers (actions for 2025–2030 that will reduce Scope 1 and 2 GHG emissions; the planned reduction by decarbonization lever is disclosed alongside the E1-4 disclosure):

- increasing energy efficiency;
- apply gas flaring systems during operational activities;
- reconstructing gas compressor stations;
- installing fixed and mobile leak detection systems to monitor methane (CH₄) emissions;
- integrating biogas into the Company's gas facility system and using it for combustion;
- using a new mobile GD compressor for repair work;
- applying special equipment (stopple, couplings) during main pipeline repair works.

Key decarbonisation levers (actions during 2025–2030 time horizon).

GHG reductions (Scope)	Decarbonisation lever	Key actions 2025–2030
Scope 1	Reconstruction of gas compressor stations	We will electrify and modernize compressor stations, reducing natural gas consumption and decreasing methane emissions.
	Installing fixed and mobile leak detection systems	We will deploy technologies to quickly detect methane leaks and reduce direct GHG emissions.
	Applying gas flaring systems during operational activities	We will install new gas flaring systems, allowing us to release less methane during maintenance and reconstruction activities.
	Incorporation of biogas into the gas plant system and its combustion	We will use biogas as an alternative fuel for boilers and compressors.
	Application of special equipment (stopple, couplings) during the repair works	Specialized equipment allows repairing pipelines without shutting off the gas and releasing it into the environment. These measures will significantly contribute to reducing direct Scope 1 emissions.

The Company's progress in implementing the GHG MAP in 2025 is disclosed in accordance with disclosure requirement E1-4.

Amber Grid owns and operates the NG (natural gas) transmission infrastructure and conducts repairs and refurbishments resulting in **locked-in** GHG emissions of approximately 183,314 tonnes of CO₂e by 2030. This figure includes energy generation in Company's own facilities, fuel consumption in mobile equipment, NG leaks, and other situations that directly or indirectly contribute to GHG emissions.

These locked-in GHG emissions may make it challenging to meet the Company's 2030 targets, particularly if mitigation measures, including infrastructure upgrades, alternative energy use, advanced technology implementation, and methane emission reductions, are not undertaken.

In 2025, we conducted Group-wide modelling of Scope 1 and 2 GHG emissions and reduction measures up to 2050, along with scenario assessments. In 2026, we plan to extend the modelling to include an assessment of Scope 3 GHG emissions up to 2050. This way, we will strive to comprehensively assess the impact of the Group's value chain on the climate and to define a consistent pathway toward achieving the Group's net-zero greenhouse gas emissions balance.

Preparation for grid transformation

Preparations are underway for the transformation and optimisation of the transmission system. The following stages are planned:

Stage	Ongoing and planned actions
1. Optimisation of the gas transmission grid.	<p>In response to the long-term decline in gas demand for domestic use in Lithuania, since the beginning of 2025 we have started preparing a plan for the safe optimization of gas infrastructure. Under this plan, we will restructure the infrastructure to ensure more efficient use of the grid. We also plan to dismantle gas distribution stations (GDS) and make more effective use of their resources.</p> <p>In addition, Amber Grid intends to assess the necessary technical modifications to the infrastructure to adapt the grid for green gas products, including synthetic gases such as green hydrogen and synthetic methanol. This will make the gas transmission grid more flexible and better suited to meet evolving energy needs in the future.</p>
2. Changes to the H ₂ infrastructure system.	<p>In 2025–2027, a comprehensive feasibility study of hydrogen (H₂) infrastructure is being carried out, which will form the basis for future stages of grid development. After 2033, the first H₂ producers and consumers are planned to be connected, and Lithuania's hydrogen grid will be integrated into the common Nordic-Baltic Hydrogen Corridor (NBHC) system, extending from Finland to Germany.</p> <p>During the period from 2033 to 2040, we seek to connect consumers and producers in north-western Lithuania to the NBHC and to develop a national hydrogen grid connecting the Baltic Sea coast to the H₂ corridor.</p>

Stage	Ongoing and planned actions
3. Achieving the Company's strategic objective to support the development of the CO ₂ capture and storage value chain.	<p>The company is dedicated to fostering the development of the CO₂ capture and storage (CCS) value chain through initiatives that will aid in achieving regional decarbonisation goals. One of the key measures to achieve this goal is participation in the CCS Baltic consortium project, which aims to create a value chain for CO₂ capture, transport, utilization, and storage value chain.</p> <p>If the consortium selects pipeline transport for CO₂, comprehensive feasibility studies of the grid and ecosystem will be carried out, and the required CO₂ transport infrastructure will be developed. A comprehensive feasibility study and action plan are planned for 2026–2027. The connection of producers to the CO₂ grid is expected to occur from 2035 onwards.</p> <p>The implementation of decarbonization objectives alongside the value chain being developed by the CCS Baltic consortium is likely to stimulate the emergence of new carbon capture, utilization, and storage (CCS/CCUS) value chains. The Company will assess each opportunity to participate in these initiatives on a case-by-case basis, taking into account its long-term strategy and market needs.</p>

Nordic-Baltic Hydrogen Corridor Project

Amber Grid, together with gas transmission system operators from Lithuania, Finland, Estonia, Latvia, Poland, and Germany, is participating in the Nordic-Baltic Hydrogen Corridor (NBHC) initiative. The initiative aims to develop international hydrogen transport infrastructure connecting the Baltic Sea region with Central Europe.

A pre-feasibility study was successfully completed in 2024. It confirmed that the project is technically and economically viable and that there is a demand for such a project in the region. Based on these results, the project partners decided to proceed with a comprehensive feasibility study, which is planned to be completed by the end of 2026 or the beginning of 2027. This phase is crucial in preparing for future infrastructure development decisions.

In 2024, the NBHC project was granted Project of Common Interest (PCI) status by the European Commission, ensuring strategic priority at the EU level and creating more favourable conditions for funding and permitting. In 2025, the project received EUR 6.8 million in funding from the Connecting Europe Facility (CEF) for the feasibility study phase.

These funds will enable detailed technical and economic analyses, including the selection of pipeline routes, planning of compressor stations, assessment of environmental and safety aspects, and preparation of the project implementation schedule. This will help ensure sustainable and economically sound development of the NBHC network and contribute to the rapid growth of the hydrogen market in the Baltic region.

Implementation of the EU Methane Regulation requirements

From 2025, the Company is required to comply with the strict provisions of the EU Methane Regulation. The regulation promotes the adoption of a **zero-methane (CH₄) emissions culture** and significantly impacts the organization of maintenance activities as well as other operational aspects.

To implement the requirements of the EU Methane Regulation, the Company carried out the following activities in 2025:

- Developing the first Leak Detection and Repair Programme (LDRP);
- Preparing the first Leak and Repair Report and the 2024 annual methane emissions report;
- Conducting an inventory of all leaks, emissions, and incomplete flaring sources;
- Measuring all potential leak sources and emissions from equipment in operation at that time;
- Estimating the annual emissions of detected leakages;
- Performing drone-based methane emission measurements at the Jauniūnai Compressor Station (DKS) facility level;
- Preparing a comparative report of source-level and facility-level measurements at Jauniūnai DKS;
- Preparing procurement documents for 2026 for services related to methane leak measurements for all sources and significant facility-level emission measurements and reporting.

In 2026, the Company plans to continue implementing the EU Methane Regulation requirements. Regular leak measurements will be carried out in accordance with the LDAR program, while facility-level measurements at all significant locations will be conducted using drones and other smart technologies. Comparative reports of source-level and facility-level measurement results will be prepared, and the data from these reports will be used to produce a higher-accuracy annual methane emissions report for 2026. In parallel, leak, repair, venting, and annual methane emissions reports for 2025 will be prepared to maintain compliance with the EU Methane Regulation. In line with regulatory requirements, the 2026 annual methane emissions report will be submitted for independent verification and delivered to the competent authority starting in 2027.

Implementing these changes will require modern gas leak control systems, advanced maintenance solutions, and more efficient data processing tools. To reduce uncontrolled emissions of natural gas, which consists of approximately 95% CH₄, the Company will seek and deploy advanced stationary methane leak detection technologies.

Moreover, in 2026, additional GHG reduction measures will be applied. During repair works, the Company will make use of the available mobile compressor, stopple, and gas flaring systems. These measures will reduce the need to vent gases during repairs, which will contribute to greater reductions in methane emissions.

Climate change adaptation

In 2023, we carried out a comprehensive Group-wide assessment of climate-related risks and opportunities in line with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). The purpose of the assessment was to evaluate the resilience of our strategy and business model to climate change and to identify opportunities to enhance adaptation measures. The assessment was based on the 2023 study prepared by the Lithuanian Hydrometeorological Service „[Klimato kaitos rizikos XXI a. viduriui studija](#)“ (*Study on climate change risks by the middle of the 21st century*), which presents the projected levels of physical risks in Lithuania under future climate conditions.

To better understand the likelihood of climate-related risks materialising, the analysis was conducted over short-term (up to 2026), medium-term (up to 2030), and long-term (up to 2050) horizons, following international best practices for climate risk assessment. The assessment considered two socio-economic scenarios from the Intergovernmental Panel on Climate Change (IPCC):

- the Paris Agreement-conforming scenario for the increase in mean temperature, limited to 1.5/2 °C (SSP1–2.6), and
- a business-as-usual scenario in which the average temperature could rise above 4 °C (SSP5–8.5).

Assumptions of physical risk under these socio-economic scenarios differ only slightly until 2050, but they vary significantly in terms of the scale of energy system transformation. Consequently, the likelihood of transitional risks differs substantially between the Paris-aligned and business-as-usual scenarios. The assessment of transformation risks relevant to the energy sector was also informed by expert evaluations from external consultants, based on IPCC scenario assumptions.

The results indicate that physical risks over the short, medium, and long term (up to 2050) are expected to have a relatively limited impact on Group activities, except for potentially greater impacts from floods and extreme water level fluctuations. Transitional risks at the Group level are also assessed as limited, although they vary at the individual company level; in the case of Amber Grid, these risks are more material. This preliminary assessment serves as a starting point for further analysis to more comprehensively evaluate and disclose the potential impact of climate-related risks on our financial performance and cash flows. The main risks are described in the "Risk Management Framework" section of EPSO-G's Integrated Annual Report 2025.

The table below gives an overview of the climate-related physical risks and their relevance to Amber Grid.

Risk type	Impact on the Paris Agreement objective and business model	Risks that may affect Amber Grid
Acute physical risks		
Heat wave, cold wave/freeze, fires, storms, wind gusts, lightning, drought, heavy precipitation, flooding, snow and ice load, landslide, subsidence	Across all assessed periods, the impact of all climate risks is very low, while flood risk is assessed as moderate.	Heatwave; cold wave/cold; fires; storms, wind gusts, lightning; drought; heavy rainfall; flooding; snow and ice load; landslide; sedimentation.
Chronic physical risks		
Changing temperatures, changing precipitation patterns, precipitation or hydrological variability, saltwater intrusion, sea level rise, water stress, geographical hazards, soil erosion	Across all assessed periods, the impact of all climate risks is very low.	Changing temperatures; precipitation or hydrological variability; saltwater intrusion; sea level rise; water stress; geographical hazards; soil erosion.

The table below gives an overview of transitional risks and their relevance to Amber Grid.

Risk type	Impact on the Paris Agreement objective and business model	Risks that may affect Amber Grid
Political and legal		
The regulatory environment, disorderly energy transition risks of potentially distortive measures, legal liability and governance accountability	Across all assessed periods, the impact of all climate risks is very low.	Regulatory environment; disorderly energy transition; legal liability and governance accountability.
Technological		
Low carbon transition costs, transition risk for older assets, asset depreciation risk	The risk associated with the costs of transitioning to low-carbon technologies is low across all periods. The risks related to the transition of older assets and asset impairment are low in the medium term (until 2030) and moderate in the long term (until 2050).	Costs of transitioning to low-carbon technologies; Transition risk on older assets, depreciation risk.
Market		
Uncertainty in consumer behaviour, market signals and changes in supply chain, raw material and energy prices.	Across all assessed periods, the impact of all risks is very low.	Uncertainty about consumer behaviour, market signals and the supply chain. Changes in raw material and energy prices.
Reputational		

<p>Transmission system reliability, expectations related to climate risk management, expectations related to disclosure of non-financial information</p>	<p>The risk to transmission system reliability is low across all assessed periods. The risk related to expectations for climate risk management and non-financial disclosure is low in the medium term (until 2030) and moderate in the long term (until 2050).</p>	<p>Transmission system reliability; expectations for climate risk management; expectations relating to disclosure of non-financial information.</p>
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We have identified [measures to manage](#) physical and transition risks; however, due to their currently low relevance, these risks have not yet been integrated into risk management plans. In 2026, we plan to update the Group's climate risk assessment and develop updated risk management plans.

E1-2 Policies related to climate change mitigation and adaptation

The energy sector is one of the most important sectors for climate policy, and as a group of energy transmission and exchange companies, EPSO-G plays an important role in ensuring a smooth and reliable transformation of the energy system in Lithuania. This transformation aims to develop renewable energy sources and integrate them into the energy system, reduce dependence on fossil fuels, initiate interconnection projects, and create more favourable conditions for climate-neutral energy exchanges.

The Group has set ambitious strategic targets for reducing its GHG Scope 1 and 2 emissions. It should be noted that these objectives are also linked to EPSO-G's long-term Sustainability-linked finance framework and sustainability-linked bond prospectus. The framework has been independently evaluated by CICERO Shades of Green, an international climate and environmental research centre. In the presented independent assessment, the sustainability targets outlined in the EPSO-G financing program were identified as ambitious compared to the sustainability targets set by other comparable companies operating in Europe.

As a manager of strategically important energy infrastructure, the Group seeks to contribute to the fulfilment of the climate change and environmental commitments laid out in the Paris Agreement, the European Green Deal, the National Energy Independence Strategy and the National Climate Change Mitigation Agenda.

E1-3 Actions and resources in relation to climate change policies

GHG emission reduction actions planned up to 2030 (Scope 1 and Scope 2 emission reductions)

Amber Grid plans to implement a range of GHG emission reduction measures to reduce Scope 1 and Scope 2 emissions by 2030. Specific actions, broken down by year, are listed below:

<p>2025 (actions undertaken)</p>	<ol style="list-style-type: none"> 1. Signing a contract for the installation and design of an electric compressor required for the reconstruction of the Jauniūnai Gas Compressor Station (GCS) and initiating design works. 2. Announcing an international market survey and initiating the procurement process for a new mobile compressor. 3. Signing a contract for the acquisition of gas flaring systems. 4. Signing a contract for the acquisition of stopple, starting production, and conducting employee training. 5. Initiating the purchase of biogas for combustion at the Company's facilities (for boilers and compressor operation). 6. Receiving the Environmental Protection Agency's screening opinion <i>On the Environmental Impact Assessment of the Panevėžys Gas Compressor Station Modernization</i>. 7. Conducting facility-level methane emission measurements (using drones) at Jauniūnai GCS.
<p>2026</p>	<ol style="list-style-type: none"> 1. Designing the Jauniūnai GCS and initiating its reconstruction. 2. Procuring a new mobile compressor. 3. Conducting employee training and operating gas flaring systems. 4. Burning biogas at the Company's facilities (for boilers and compressor operation). 5. Designing the modernization works for the Panevėžys GCS. 6. Searching for stationary leak detection systems and procuring facility-level leak detection services. 7. Using electricity from RES for all Company's needs.
<p>2027</p>	<ol style="list-style-type: none"> 1. Reconstructing the Jauniūnai GCS and installing the electric compressor. 2. Further usage of biogas.

	<ol style="list-style-type: none"> 3. Reducing the number of polluting transport vehicles. 4. Using electricity from RES for all Company's needs.
2028	<ol style="list-style-type: none"> 1. Reconstructing the Jauniūnai GCS and installing the electric compressor. 2. Modernisation of the Panevėžys GCS. 3. Further usage of biogas. 4. Further usage of stopple, compressor and other special measures. 5. Using electricity from RES for all Company's needs.
2029	<ol style="list-style-type: none"> 1. Operating the electric compressors at Jauniūnai GCS at full capacity. 2. Modernisation of the Panevėžys GCS. 3. Using all previously mentioned measures during maintenance, leak detection, and identification activities. 4. Using biogas or H₂. 5. Using electricity from RES for all Company's needs.
2030	<ol style="list-style-type: none"> 1. Operating the electric compressors at GCS at full capacity. 2. Using all previously mentioned measures during maintenance, leak detection, and identification activities. 3. Using biogas or H₂. 4. Using electricity from RES for all Company's needs.

The GHG emissions reduction plan is continuously updated and revised, so the measures outlined may change depending on the Company's situation and market conditions. Amber Grid holds quarterly meetings with responsible employees to share information on new measures, market analyses, and the status of project implementation. On 24 November 2025, the updated rules of the Company's Technology and Innovation Committee were approved, stipulating that the implementation of the GHG emissions reduction plan must be presented and analysed in the Committee twice a year. Based on the information provided, the Company will initiate pilot projects, prepare investment projects, conduct market reviews, organize procurements, and carry out other significant activities.

Financing the Action Plan

Amber Grid finances its GHG emissions reduction measures using its own funds, consisting of revenues generated from operations, as well as borrowed funds. The Company's source of borrowing is the Group's parent company, EPSO-G, which lends to its subsidiaries both from its own funds and from borrowings. EPSO-G finances its activities with sustainable financial instruments and has also issued a sustainability bond.

Amber Grid plans to allocate approximately €103 million for investments and around €1.2 million for operating costs in 2025–2030 to achieve its GHG emissions reduction targets.

These funds will be used for:

All GHG emission reduction measures are included in the long-term Procurement Plan “Network Operating Costs and Fixed Asset Investments”. In the financial statements, these investments are shown under **fixed assets**, without specifically distinguishing them as measures aimed at reducing GHG emissions.

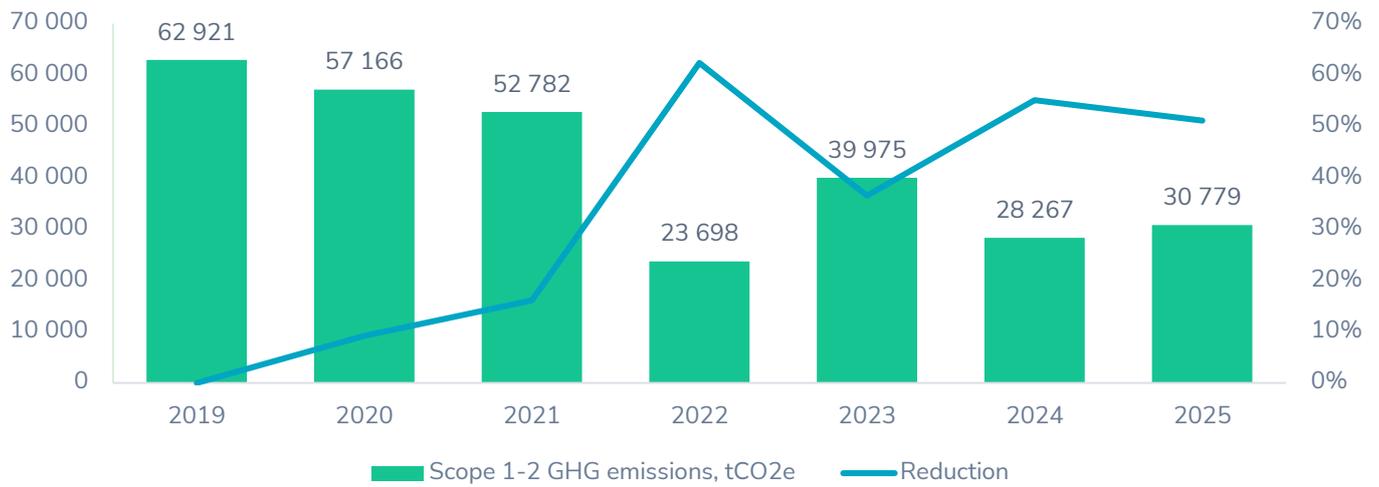
Progress in reducing GHG emissions in previous periods

GHG emissions vary from year to year, as the Company's direct emissions depend on the scale of the work it carries out, including reconstruction, new projects and other activities that affect the level of emissions.

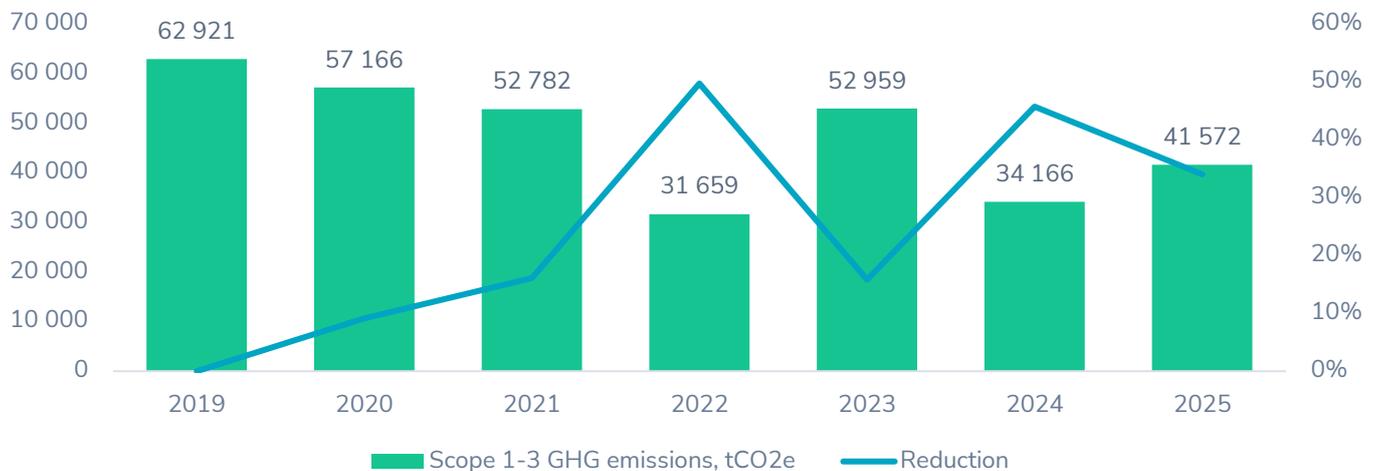
Reducing emissions is primarily driven by the transfer of natural gas using a mobile gas compressor during main gas pipeline repair works and by ensuring the efficient operation of compressor equipment. The introduction of new, cleaner technologies and the reduction of natural gas consumption for process use not only reduce GHG emissions but also increase operational efficiency, contributing to CO_{2e} reduction and sustainability objectives.

To ensure the safe operation of the transmission system, the Company must continuously maintain and upgrade its infrastructure. Accordingly, annual maintenance works on the main gas pipeline are carried out, with the scope varying depending on the condition of the infrastructure and technological requirements.

GHG emission reductions achieved since the base year (Scope 1 and 2, tCO2e)



GHG emission reductions achieved since the base year (Scope 1, 2 and 3, tCO2e)



In 2021, the Company carried out a GHG emissions inventory and a general environmental impact assessment. In 2022, based on the inventory results, it prepared and approved an Environmental Impact Mitigation Plan (EIMP) until 2030.

In 2024–2025, the GHG targets and measures plan was updated following the modelling of the Group's GHG targets and measures. Although most elements of the plan remained unchanged, in 2024 we decided not to proceed with the H₂ pilot project, which had envisaged injecting a mixture of natural gas and hydrogen (up to 2%) into the gas supply system. In 2025, we also decided not to replace gas boilers with electric ones at gas distribution stations and instead chose to develop biogas utilisation at these facilities.

Reasons for rejection of the projects:

- Limited market demand. The survey indicated that the market demand for injecting H₂ into the gas network is limited, and therefore there are no prospects for this service in the future.
- High costs. Installing electric boilers at gas distribution stations and adapting the transmission system for H₂ blending is costly. Therefore, the Company decided to use biogas at the distribution stations and plan for dedicated H₂ transportation infrastructure, which will be more efficient.

- Electric boilers are unreliable in the event of a power outage. Ensuring continuous electricity supply at gas distribution stations would require installing diesel generators alongside the electric boilers, which would limit any significant reduction in environmental impact.

It cannot be ruled out that, in the future, as market conditions evolve and technologies develop rapidly, there may be a need to blend H₂ or electrify the gas distribution stations. In such a case, the projects may be reconsidered. The company continuously monitors changes in the regulatory environment and analyses the needs, demand and prices in the market to be ready to respond to possible future changes.

RES energy

In 2021, Amber Grid built 1.45 MW of solar parks at three of the Company's facilities. In February 2022, these renewable energy parks became fully operational. Some of the electricity generated covers the electricity costs of the administrative buildings, contributing to sustainable operations and energy efficiency.

Since 2023, the Company has fully replaced all electricity previously generated from non-renewable sources with green electricity produced from renewable energy sources (RES).

Replacing vehicles with less polluting ones

In 2024, the Company replaced its polluting diesel and petrol cars with less polluting hybrid cars and less polluting electric cars. 119 polluting cars were replaced. Amber Grid currently operates 50 hybrid cars and 20 zero-emission electric vehicles.

Electric vehicles are charged using infrastructure located at three facilities: Vilnius, Jauniūnai, and Panevėžys. They are equipped with charging stations of various capacities: 11 kW, 22 kW, 44 kW, and 150 kW.

In 2025, the Company's electric vehicles and plug-in hybrids were charged exclusively with renewable electricity, both at public charging stations and using electricity generated by the Company's solar parks. During the summer months, the solar parks fully covered the electricity demand for charging electric vehicles.

Combustion of biogas with guarantees of origin

In 2025, Amber Grid consulted with biogas suppliers, independent evaluators of the annual GHG reports under the EU Emissions Trading System, and sustainability report auditors, and analysed market opportunities and prices for purchasing biogas with guarantees of origin. Taking into account the conducted analysis, we have prepared procurement documents and initiated the purchase of biogas with guarantees of origin for our own use in 2026. We plan to use biogas with guarantees of origin to operate the boilers at our compressor and gas distribution stations. By replacing natural gas with biogas with guarantees of origin, GHG emissions could be reduced by up to 1.35% in 2026. In the future, it is planned to purchase and use a greater volume of biogas with guarantees of origin.

Technological tools

To reduce direct GHG emissions, in 2025 we invested in technological measures that help effectively reduce Scope 1 emissions. In 2025, the company procured stopple for pipeline repair works, acquired site-level (drone-based) methane leak detection and emissions assessment services, and invested in the modernization of the Jauniūnai gas compressor station.

In 2026, we plan to invest in the following key measures: stopple, a new mobile compressor, and gas flaring equipment. These will be used for the reconstruction and repair of the main gas pipeline to reduce emissions and optimize gas usage. We are also procuring site-level (remote) methane leak detection, emissions assessment, and benchmarking analysis services. All of these measures are crucial for complying with the Methane Regulation and contribute to developing a sustainable and environmentally friendly gas transmission system.

In 2026, we will continue investing in the ongoing modernisation of the Jauniūnai GCS. The upgraded compressor station will operate more efficiently, consume less natural gas, and consequently reduce GHG emissions (CO_{2e}) as well as air pollutants (NO_x, CO).

Mobile compressor efficiency

The mobile compressor is one of the key environmental mitigation measures to reduce GHG emissions. Its use is effective wherever the technology can be applied, especially during the repair and reconstruction of main gas pipelines. The use of the mobile gas compressor has resulted in the following savings (avoided emissions released into the environment):

- 2025 – 1.078 million m³ of natural gas, equivalent to approximately 21.89 thousand tons of CO_{2e};
- 2024 – 1.4 million m³ of natural gas, or 29.25 thousand tonnes of CO_{2e};
- 2023 – 2.3 million m³ of natural gas, equivalent to approximately 48.81 thousand tons of CO_{2e};
- 2022 – 783.2 million m³ of natural gas, or 15.94 thousand tonnes of CO_{2e};
- 2021 – 2.118 million m³ of natural gas, or 43.10 thousand tonnes of CO_{2e};
- 2020 – 2.03 million m³ of natural gas, or 41.31 thousand tonnes of CO_{2e};

The amount of savings depends on the scope of repair and reconstruction works, the applicability of the mobile compressor, and the effectiveness of other measures (e.g., stopple), so results may vary from year to year.

To minimize environmental impact, we strive to use the mobile compressor as frequently and efficiently as possible each year. This equipment is one of the key Scope 1 emission reduction measures implemented by the Company and included in the GHG MAP. By using this compressor, we can optimize gas losses, reduce GHG emissions, and contribute to the implementation of sustainable business practices.

Methane leak detection technologies

In 2025, we outsourced the inventory and measurement of methane leakage sources. The service providers used a combination of flame ionisation detectors or laser spectroscopy instruments (FID/PID), optical gas imaging (OGI), high flow sampling (HFS) and drone technology for site-level measurements to detect methane leaks and assess emissions at source level.

The stationary methane leak detection technologies tested in practice so far (acoustic camera, optical gas imaging camera) have not been effective in meeting the requirements of the Methane Regulation and have not significantly improved methane leak control. In 2026, we will explore other technologies to conduct monitoring more quickly, accurately, and efficiently.

It is expected that in 2026 the European Commission will issue implementing acts that will not only provide clearer technical guidance on the use of methane leak detection technologies but also facilitate their application and ensure well-defined technical requirements.

Optimising gas compressor capacity (electric compressors)

The GHG MAP also includes more efficient use of fuels, as well as switching equipment from fuel-burning to electric compressors or to cleaner fuels (e.g. biogas, green hydrogen).

In 2023, an efficiency improvement analysis carried out by external consultants on the Jauniūnai and Panevėžys GCS showed that the most appropriate way to reduce fuel consumption and emissions at these stations is to introduce new electric driven technologies. In the same year, the purchase of a new electric compressor for the Jauniūnai GCS was initiated.

In 2024, we launched a tender for the procurement of equipment, design, and construction works for the Jauniūnai GCS electric compressor, and in 2025, the contract was signed. The contract value is EUR 30.9 million (EUR 37.4 million including VAT), with works scheduled over 42 months, and construction began in autumn 2025.

In 2025, a screening assessment of the environmental impact of the Panevėžys GCS modernization was conducted. The Environmental Protection Agency concluded that an environmental impact assessment was not required and approved the modernization conditions. The modernization includes the installation of two electric compressors to replace the gas compressors and significantly reduce natural gas consumption.

It is expected that the new electric compressor at the Jauniūnai GCS will take over most of the gas compressors' operational load from 2029, and at the Panevėžys GCS from 2030. This will significantly reduce GHG emissions and the air pollutants generated by the compressor stations.

E1-4 Targets related to climate change

Amber Grid implements GHG emission reduction initiatives and continuously reviews its environmental impact reduction plans to minimise its negative environmental impacts and to meet stakeholders' expectations. In 2021, the Company carried out a GHG emissions inventory and an overall environmental impact assessment, and in 2022, on the ground of the inventory results, a plan of mitigation measures up to 2030 was prepared and approved.

Every year, including 2025, based on annual plans and expected works, we reviewed the GHG MAP and updated the projected emissions savings forecasts. Most elements of the plan remained unchanged; however, in 2025, we abandoned the solution of replacing gas boilers with electric ones at gas distribution stations. Instead, we decided to develop biogas combustion solutions, which will contribute to reducing GHG emissions. We were also unable to identify a reliable stationary remote methane leak monitoring system; therefore, in 2026, we will continue to explore new technologies to enable faster, more accurate, and more efficient monitoring.

The Company carried out GHG emissions modelling up to 2040 under various scenarios, including a climate scenario in which global warming is limited to 1.5°C.

The company's GHG emission reduction targets for 2030 (see table below) are based on the implementation of these initiatives and legislation:

- The **Paris Agreement** and the **EU Green Deal**, both of which provide for a reduction of at least 55% of greenhouse gas emissions by 2030 (compared to 1990 EU levels) and achieving climate neutrality by 2050.
- The EU and US Global Methane Pledge aiming to reduce global methane emissions by 30% in all emitting sectors by 2030 (compared to 2020 levels).
- 2021–2030 **National Energy and Climate Action Plan**, with targets by 2030 including:
 - Reducing GHG emissions by 40% (compared to 1990);
 - Improving energy efficiency by at least 32.5%;
 - Increasing the share of renewable energy sources (RES) in the total energy mix to 32%.
- The **Methane Regulation**, drawn up by the European Parliament and the Council, imposes stringent methane emission management requirements on the gas transmission sector to reduce methane leakage and ensure the sustainable

Science-based GHG reduction targets

Amber Grid aims to ensure that its GHG emission reduction targets are scientifically sound and compatible with the global goal of limiting global warming to 1.5 °C.

The Company's emission reduction targets have been set in accordance with the **Science Based Targets Initiative (SBTi)** methodology, which is globally recognised and used to set targets that are consistent with climate change mitigation requirements. This methodology was applied at the Group level to ensure consistency and a science-based approach across all Group companies.

Key GHG emission reduction targets

	Target		Base year and value	Progress			Status
	2026	2030		2025	2024	2023	
Scope 1 and 2 emissions, tCO2e	44,044	31,460	62,921	30,779	28,267	39,975	Target in progress
Reduced Scope 1 and Scope 2 emissions compared to 2019, %	-30%	-50%	N/A	-51%	- 55 %	- 36 %	Target in progress

Detailed GHG emission reduction targets and results for 2025

	2019 Base year	2025 Targets	2025 Actuals	2026 Targets	2027 Targets	2028 Targets	2029 Targets	2030 targets
GHG emissions before abatement actions (Scope 1-2) (tCO2e)	62,921	-	-	-	-	-	-	-
GHG emission abatement in respective years (Scope 1-2) (tCO2e)	-	56,628.6	30,779	44,044	44,044	44,044	37,752	31,460
Reduced Scope 1-2 emissions compared to the 2019 base, %	-	-10%	-51%	-30%	-30%	-30%	-40%	-50%

	2019 Base year	2025 Targets	2025 Actuals	2026 Targets	2027 Targets	2028 Targets	2029 Targets	2030 targets
Reconstruction/repair of gas pipelines, use of stopple	–	0	-2,529	-1,250	-17,536	-1,209	0	-1,072
Optimising gas compressor capacity (electric compressors)	–	0	0	0	0	0	-6,240	-7,323
Acquisition of a new mobile compressor	–	0	0	0	0	-3,274	-3,274	-3,274
Gas combustion	–	0	0	-7,864	-7,186	-7,520	-6,578	-6,578
Biogas for gas and space heating in GDS	–	0	0	0	-474	-664	-854	-1,139
Combustion of biogas with guarantees of origin in compressors and (or) other gas equipment	–	0	0	-848	-848	-848	-848	-848
Replacing vehicles with less polluting ones	–	-332	-332	-322	-322	-322	-322	-322
100% of electricity consumption is generated from renewable sources	–	-2,089	-2,089	-2,089	-2,089	-2,089	-8,851	-19,528
Mobile compressor available	–	0	-21,891	-3,007	-4,392	0	0	0

In 2025, Scope 1 and 2 GHG emissions decreased by 51% (compared to 2019), mainly due to the use of a mobile compressor, stopple and couplings during gas pipeline reconstruction and maintenance; 100% of electricity consumed was generated from renewable energy sources, including solar panels operated by Amber Grid; and the increased use of less polluting electric and hybrid vehicles. Comparing the 2025 results with 2024, an increase in GHG emissions is observed – driven by more intensive operations at the Jauniūnai GCT and by the comprehensive site leak inventory and measurements conducted in 2025 in accordance with the Methane Regulation requirements.

Update of the emission calculation methodology

In 2024, electricity and methane (CH₄) emission factors were updated to enable more accurate emissions assessment and better planning of reduction measures. In June 2024, the Amber Grid methodology “Natural Gas Consumption for Technological Needs in AB Amber Grid Gas Transmission System” was revised (and further refined in 2025), which affects the assessment of uncontrolled natural gas quantities (Scope 1 emissions). The methodology was refined taking into account evolving legislation and European Parliament and Council Regulation (EU) No 2024/1787 on the reduction of methane emissions in the energy sector, which partially amends Regulation (EU) 2019/942 (hereinafter – the Methane Regulation), as well as the recommended guidance set out therein.

After revising the calculation methodology, to ensure data comparability, the baseline and subsequent year values submitted to the SBTi were recalculated solely using mathematical adjustments. The recalculation of the emission factors and the change in the methodology resulted in a 17% reduction in base year emissions compared to the previously established value. In 2025, we refined the emissions assessment methodology and, in accordance with the Methane Regulation requirements, wherever possible, evaluated emissions using actual measurement data.

Monitoring of GHG emission reduction measures and risk management

All measures included in the GHG emission reduction plan are documented and systematically monitored. Quarterly meetings are held with responsible personnel to ensure that measures are implemented and deadlines are met. On 24 November 2025, the updated rules of the Company’s Technology and Innovation Committee were approved, specifying that the implementation of the GHG Emissions Reduction Action Plan must be presented and reviewed by the Technology and Innovation Committee once every six months. The Company’s Board evaluates annually the achievement of the set targets. The evaluation results form part of the annual financial incentive scheme for both managers and employees.

Plans and related risks are managed and have been incorporated into the Amber Grid risk management register. Potential risks include: untimely or inaccurate collection and reporting of sustainability-related indicators; inaccurate calculation of GHG emissions from the Company's operations; delays in reporting on commitments to institutional investors. Such risks may result in sanctions from regulatory authorities (for example, stock exchange supervisory bodies) and financial penalties for non-compliance with commitments.

The risk that the regulator's disapproval of necessary investments in environmental mitigation measures (e.g. GHG emission reductions) due to regulatory constraints or economic disadvantage may prevent the achievement of long-term strategic objectives and commitments.

Scope 3 GHG reduction targets

Amber Grid is currently focusing on reducing Scope 1 and Scope 2 emissions, as these are the areas with the highest GHG emissions. The plan was designed to regulate activities in the most environmentally damaging areas. The Company has identified the most significant contributors to GHG emissions. These are controlled and uncontrolled releases of CH₄ from operations and stationary installations using natural gas (NG) for technological purposes.

Scope 3 emissions were calculated for the first time in 2023 and accounted for **21%** of total GHG emissions. In 2026, we plan to extend the modelling at the Group level to include a Scope 3 assessment of GHG emissions up to 2050. This will allow us to comprehensively evaluate the climate impact of the Group's value chain and define a consistent pathway toward achieving net-zero GHG emissions.

E1-5 Energy consumption and mix

Energy consumption and mix



Methodology for calculating energy consumption. Consumption of crude oil and petroleum products (MWh) was calculated based on fuel used by vehicles and mobile equipment. Natural gas fuel consumption (MWh) was calculated by including the amount of gas consumed at gas distribution stations for process purposes. Consumption of purchased fossil-based electricity, heat, steam, and cooling (MWh) was calculated by summing the amounts used for own needs, technical losses, offices, and heating. Consumption of purchased renewable electricity, heat, steam, and cooling (MWh) was calculated based on the amounts of certified renewable electricity consumed. Consumption of self-generated renewable energy (MWh) was calculated based on electricity produced for own needs from solar power plants. Energy consumption data is obtained from commercial invoices and (or) accounting systems. Data constraints for energy consumption and energy mix are indicated by "N/A".

Methodological limitations and uncertainties. Initial data are recorded in different units (e.g., liters, m³, kWh), so the final MWh values depend on the applied conversion factors. This may result in calculation uncertainties.

Energy consumption and mix	2021	2022	Change 2022/21 %	2023	Change 2023/22 %	2024	Change 2024/23 %	2025	Change 2025/24 %
(1) Fuel consumption from coal and coal products (MWh)	0	0	0	0	0	0	0	0	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	2,832.47	2,593.5	-8.4	2,877	10.9	2,216.4	-23	2,339.4	5.55
(3) Fuel consumption from natural gas (MWh)	64,843.7	89,803	38.5	93,223	3.81	86,915	-6.77	105,930	21.9
(4) Fuel consumption from other fossil sources (MWh)	0	0	0	0	0	0	0	0	0
5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	3,248.40	2,211.94	-31.9	57.3	-97.4	55.28	-3.5	71.92	30.1
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	70,924.6	94,608.6	33.4	96,157.1	1.6	89,186.8	-7.2	108,341.6	21.5

Energy consumption and mix	2021	2022	Change 2022/21 %	2023	Change 2023/22 %	2024	Change 2024/23 %	2025	Change 2025/24 %
Share of fossil sources in total energy consumption (%)	100	99.67	-0.33	97.6	-2.1	97.4	-0.17	98.0	0.66
(7) Consumption from nuclear sources (MWh)	0	0	0	0	0	0	0	0	0
Share of consumption from nuclear sources in total energy consumption (%)	0	0	0	0	0	0	0	0	0
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	0	0	0	0	0	0	0	0	0
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	0	23.24	N/A	1,913.18	N/A	1,874.18	-2.04	1,756.2	-6.29
(10) The consumption of self-generated non-fuel renewable energy (MWh)	0	288.5	N/A	492.71	70.78	512.32	3.98	412.37	-19.5
(11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	0	311.8	N/A	2,405.9	N/A	2,386.5	-0.8	2,168.6	-9.1
Share of renewable sources in total energy consumption (%)	0	0.33	N/A	2.44	N/A	2.61	6.77	1.96	-24.7
Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)	70,924.57	94,920.4	33.8%	98,563	3.8%	91,573.26	-7.1%	110,510	20.7%

Notes: 1) Uncontrolled leaks in 2024 were recalculated solely using a mathematical approach, based on the new methodology "Natural Gas Consumption for Technological Needs in AB Amber Grid Gas Transmission System."

2) The Company does not produce its own non-renewable energy, but uses NG that is transported. The Company generates only electricity for its own use, using renewable energy sources (solar energy). The quantities of electricity generated were as follows: 70.08 MWh in 2021, 1,426.195 MWh in 2022, 1,478.375 MWh in 2023, 1,440.102 MWh in 2024, and 1213.22 MWh in 2025

In 2025, fossil energy consumption increased by 21.5% compared to 2024. This was due to more intensive operation of compressors at the Jauniūnai GCT, with gasoline and diesel consumption 5.55% higher than in 2024. Fossil based heat consumption also rose by 30% due to colder weather conditions and other factors. As a result, the share of fossil fuel energy within total energy consumption also increased. At the same time, consumption of renewable electricity decreased by 9.1% in 2025.

Energy intensity

Methodology for calculating energy consumption intensity per net revenue

The energy intensity is calculated by dividing the total energy consumption (MWh) for the reporting year by the net revenue (EUR) attributable to activities with high climate impact.

Financial data on net revenue are taken from the Consolidated and separate financial statements, Section 12.2 "Consolidated Statement of Total Revenue."

Methodological limitations and uncertainties. When calculating net revenue, activities of Amber Grid that do not have high climate impact are excluded.



Energy intensity per net revenue	2021	2022	Change 2022/21	2023	Change 2023/22	2024	Change 2024/23	2025	Change 2025/24
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/Monetary unit)	0.001	0.00098	-7.26%	0.0012	23.4%	0.00122	1.3%	0.00159	29%

Notes:

1) According to the NACE codes, the Company's activities are classified under the following sectors, all of which are recognised having a significant impact on the climate: Transportation of natural gas – **D.35.22** Distribution of gaseous fuels through mains; Construction – **F.42.99** construction of other civil engineering works n.e.c.

2) The following lines of the financial accounting records are used to calculate the amount of cash receipts: Revenue from contracts with customers: Transmission of natural gas in the territory of Lithuania, Balancing revenue in the transmission system, Connection of new customers (deferred revenue), Other revenue, Revenue not attributable to contracts with customers, Revenue from administration of LNGt (Liquified Natural Gas terminal) funds.

Compared to 2024, energy intensity increased by 29% in 2025, due to lower revenue and higher energy demand for gas compressor operations.

E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions

GHG inventory methodology

Scope 1-3 emissions are calculated in accordance with the "[Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard](#)".

Data sources used:

- Input data (performance metrics) are obtained from the internal accounting system;
- Emission factors are derived from databases and sources: EXIOBASE, DEFRA, AIB, Gijos, etc.

Methodological limitations and uncertainties:

- Scope 3 GHG emissions calculation using supplier data. Direct data from suppliers is not used due to data availability and reliability challenges; currently, a spend-based method is applied, which is not accurate. In the future, we plan to switch to actual calculations and collect data directly from suppliers.

GHG intensity inventory methodology

GHG intensity is calculated by dividing the total GHG emissions for the reporting year (tCO_{2e}) by net revenue (EUR). The calculations use financial data from the financial statements.



The calculation was based on the knowledge and methodologies of the market financial institutions and suppliers of energy resources. The assessment includes not only carbon dioxide (CO₂) but also other greenhouse gases – methane (CH₄) and fluorinated gases (HFCs) – converted into CO₂ equivalents using standard conversion factors. Emission consolidation method: operational control.

GHG calculation base year is 2019, as this was the first year when Amber Grid began systematically assessing and calculating the emissions generated.

2019 Scope 1 and 2 GHG emissions were recalculated per updated emission factors and a revised GHG calculation methodology in 2024. Similar recalculation has been carried out for the GHG emission data from 2020 to 2023 to ensure comparability of the data and to track the progress of the Group accurately. This update allows for a more accurate assessment of emission changes, consistent monitoring of emission reductions in line with the SBTi methodology and compliance with industry best practices and regulatory requirements.

Emission factors (EFs) have been selected based on reliable sources and national and international guidelines, with preference given to the geographically closest data. When selecting which factors to use, priority is given to emission factors (EFs) provided by the supplier; if these are unavailable, the closest location-specific EFs are used (with preference for Lithuanian data), and if those are also not available, the most recent accessible EFs are selected.

Calculation and reporting coverage of Scope 3 GHG emissions

The disclosure of Scope 3 GHG emissions is subject to reporting coverage and methods for calculating GHG emissions:

Scope 3 GHG emissions	
Category 1: Purchased goods and services	Emissions from third-party production of goods and services used in operations. A spend-based method was used for the calculations.
Category 2: Fixed assets	Emissions arising from the acquisition of fixed assets. A spend-based method was used for the calculations. Emissions from tangible assets received from third parties are not included in the calculations, as they are carried out using the Standard spend-based method.
Category 3: Extraction and transport of fuels (not accounted for in emission Scopes 1 and 2)	Third party emissions from the extraction, production and transport of fuels consumed by the Company and emissions from fuel preparation required to generate the electricity and heat (central heating) consumed. The method of averaging data was used for the calculations.
Category 5: Waste generated by the Group's activities	Based on actual and estimated waste volumes of the Company. The method used for the calculations is tailored to the type of waste.
Category 6: Business traveling	Emissions related to flights and overnight stays of employees on business trips. The distance-based method was used for the calculations.
Category 7: Employee commuting	The method of averaging data was used for the calculations.

Category 11: Use of sold products is excluded from Amber Grid's scope 3 GHG emissions. The Company's GHG accounting strictly adheres to the Greenhouse Gas Protocol guidelines. Since Amber Grid does not own or sell the natural gas it transports, emissions from the combustion of the gas are not included in the Company's Scope 3 emissions.

Calculation of Scope 3 Category 11 emissions and the reduction targets applied to this category are a specific SBTi requirement for companies that sell and transport fossil fuels. In 2024, the EPSO-G group submitted an application to join the SBTi. However, in 2025, during the GHG emissions target alignment process, it became clear that the EPSO-G Group, like other natural gas infrastructure operators, is required under the SBTi methodology to set Scope 3 GHG emissions reduction targets covering the entire volume of natural gas transported.

Under European Union legislation, gas transmission system operators are obliged to ensure security of supply and third party access to infrastructure, and are therefore not able to limit the volumes of natural gas transported in order to reduce Scope 3 emissions. In light of this, the EPSO-G group submitted a decision to the CSTI not to proceed with the alignment of objectives. If in the future the SBTi adopts methodological changes allowing Scope 3 targets not to be linked to the entire volume of natural gas transported, the EPSO-G group will assess the possibility of resuming the GHG emissions reduction target alignment process under this initiative.

However, Amber Grid voluntarily calculates Scope 3 Category 11 GHG emissions and discloses them outside of Scope 3. These emissions amount to 11,018.35 thousand tCO₂e in 2024 and 10,452.29 thousand tCO₂e in 2025.

GHG emissions

Emission type	Base year 2019	Retrospective					Change 2025/ 2019
		2021	2022	2023	2024	2025	
Scope 1 GHG emissions							
Gross Scope 1 GHG emissions (tCO ₂ eq)	61,772.29	51,569.15	22,694.96	39,971.75	28,261.99	30,755.21	30,997
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	7.19	0.79	12.04	35.64	23.51	66.0	817.9
Scope 2 GHG emissions							
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	1,148.39	1,212.66	1,003.22	2.83	4.53	3.96	-1,144.4
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	483.50	795.00	515.40	289.20	283.30	401.6	-81.9
Emission type	Base year 2022			2023	2024	2025	Change 2025/ 2022
Material scope 3 GHG emissions							
Total Gross indirect (Scope 3) GHG emissions (tCO ₂ eq)	-	-	7,972.99	12,984.50	6,007.670	10,792.5	2,833.79
1. Purchased goods and services	-	-	936.49	1,670.54	1,220.405	1,589.8	653.3
[Optional subcategory: Cloud computing and data centre services]	-	-	-	-	-	-	-
2. Tangible fixed assets	-	-	3,706.97	8,158.01	1,584.387	5,282.1	1,575.2
3. Fuel and energy related activities (not included in Scope 1 or 2).	-	-	2,975.50	2,815.62	2,839	3,626.0	652.8
4. Upstream transportation and distribution	-	-	-	-	-	-	-
5. Waste generated in operations	-	-	32.73	66.52	3.7	1.6	-19.1
6. Business traveling	-	-	53.98	24.69	39.029	71.8	17.8
7. Employee commuting	-	-	267.32	249.12	367.004	221.2	-46.1
8. Upstream leased assets	-	-	-	-	-	-	-
9. Downstream transportation	-	-	-	-	-	-	-

10. Processing of sold products	-	-	-	-	-	-	-
11. Use of sold products	-	-	-	-	-	-	-
12. End-of-life treatment of sold products	-	-	-	-	-	-	-
13. Downstream leased assets	-	-	-	-	-	-	-
14. Franchises	-	-	-	-	-	-	-
15. Investments	-	-	-	-	-	-	-

Emission type	Base year 2019	2021	2022	2023	2024	2025	Change 2025/2019
Total GHG emissions (tCO2e)							
Total GHG emissions (location-based) (tCO2e)	62,255.8	52,364.2	31,183.3	53,245.4	34,552.95	41 973,4	-20 282,4
Total GHG emissions (market-based) (tCO2e)	62,920.7	52,781.8	31,671.2	52,959.1	34,274.2	41 571,7	-21 349

Note: Amber Grid does not own any other companies and therefore does not allocate additional GHG emissions. The definition of the Company and its value chain has not changed substantially since the base year, so there is no impact on GHG comparability.

Based on the performed Scope 1–3 calculations, total GHG emissions in 2025 increased by 22% compared to 2024, but decreased by 33.9% using the local method compared to 2019. Due to more intensive operation of the Jauniūnai GCS gas compressors in 2025, fuel consumption for stationary equipment increased by 24.8% compared to 2024. Fuel consumption for mobile transport increased slightly. With fewer pipeline reconstruction projects in 2025 than in previous years, there were also fewer controlled releases of natural gas.

On the other hand, in 2025, a full inventory and measurement of all potential leak sources was carried out in accordance with the Methane Regulation requirements. A total of 138,006 leak sources were identified and measured, of which 1,274 leaks were detected and their volumes quantified. Where possible, leaks were promptly repaired. According to the Oil and Gas Methane Partnership 2.0 (OGMP 2.0), technical guidance has been used to determine the duration of leaks and estimate the magnitude of emissions.

It is important to note that, for the first time, when assessing the duration of leaks across the entire inventory in accordance with OGMP 2.0 technical guidance, the leak start date was set as 1 January 2025 (the beginning of the reporting year), unless other information on the leak start date was available. The end of a leak was considered to be either the recorded repair completion time and date or the end of the reporting year (31 December 2025). Due to this assessment of leak duration and the comprehensive inventory of potential leak sources, uncontrolled natural gas emissions increased by 733 tCO2e compared to 2024. However, the emissions are slightly overestimated. In 2026, following the Methane Regulation and OGMP 2.0 technical guidance, and taking into account the dates of the most recent measurements, leak start times, and durations, we will estimate leaks more accurately, so emissions from uncontrolled natural gas releases are expected to decrease and stabilize.

There have been no significant changes in Scope 2. Compared to 2024, electricity and heat consumption is slightly higher. In 2025, all electricity consumed came from renewable sources, resulting in a 99.7% reduction in emissions calculated using the market-based method compared to the 2019 baseline.

Scope 3 emissions increased by 35.6% compared to the 2022 baseline. This was driven by changes in Categories 1, 2, 3, and 6. In 2025, we carried out more building renovation projects, resulting in higher purchases of goods and increased expenses related to long-term assets. Information technology systems have also been introduced and developed more intensively. Since Scope 1

emissions increased compared to previous years due to higher fuel consumption in gas compressors, Scope 3 Category 3 emissions (“Fuel Extraction and Transport”) also correspondingly increased. Compared to the base year, emissions from Business Travel increased by 17.8 tCO₂e.

In the remaining Scope 3 categories (5 and 7), emissions have decreased compared to previous years. As mentioned earlier, in 2025 building renovations were carried out, but relatively few gas pipeline infrastructure reconstructions took place, resulting in less waste generated. No waste and/or spare parts stored from earlier renovation projects were disposed of. The decrease in Category 5 emissions is also related to the fact that more waste is directed to recovery or recycling processes rather than disposal.

The methodology for estimating Scope 3 Scope 7 emissions was updated in 2025. In January 2026, we conducted an employee survey on commuting, with responses from 241 employees out of 368. The results were extrapolated to the entire workforce, providing a more accurate emissions estimate. Due to the methodology update, calculated emissions decreased by 17.3% (~468 tCO₂e) compared to the base year.

GHG intensity

GHG intensity per net revenue	2021	2022	Change 2022/21	2023	Change 2023/22	2024	Change 2024/23	2025	Change 2025/24
Total GHG emissions (location-based) per net revenue (tCO ₂ e/Eur)	0.00078	0.00032	-58.7%	0.00065	102.9%	0.00046	-29.2%	0.0006	29.9
Total GHG emissions (market-based) per net revenue (tCO ₂ e/Eur)	0.00079	0.00033	-58.4%	0.00065	98.7%	0.00046	-29.4%	0.00059	29.8

Note: Lines in the financial statements disclosing the amount of revenue used to calculate the GHG intensity indicator: Data for 2025 are available on the [website](#).

E1-7 GHG removals and GHG mitigation projects financed through carbon credits

This practice is not carried out by the Company, and disclosure of relevant information is not applicable.

E1-8 Internal carbon pricing

This practice is not carried out by the Company, and disclosure of relevant information is not applicable.

E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

In line with the option for phased disclosure, we do not currently provide a quantitative assessment of the impact of financially material climate-related physical and transition risks and opportunities.

E2 Pollution

The Company's combustion plants generate emissions of air pollutants that affect ambient air quality, and therefore the Company considers air pollution prevention to be an important area of its activities and has measures in place to manage the impacts and associated risks. Based on the results of the Double Materiality Assessment, the air pollution topic was found to be material for emissions from compressors, boilers and generators. The following section provides an overview of the actual negative impacts associated with air pollution.

Impacts, risks and opportunities

Sub-topic: Air pollution		
	Actual negative impact	Air pollutant emissions from fuel combustion plants (compressors, boilers, generators) emitting NOx, CO and other pollutants that affect air quality.

E2-1 Policies related to pollution

Policies applied to manage environmental air pollution are described in the section “MDR-P Policies adopted to manage material sustainability matters”. Impacts related to environmental air pollution are managed through the implementation of the Group’s environmental and sustainability policies.

In our Environmental Policy, we are committed to implementing modern technologies and measures that reduce environmental impact, as well as fostering and strengthening a zero-tolerance culture towards environmental pollution.

In our Sustainability Policy, we have defined the key environmental principles and directions – we aim for climate-neutral energy and consistently reduce the environmental impact of our activities.

When implementing projects, the Company sets additional environmental requirements in the area of pollution prevention to ensure that partners (contractors) are not only informed but also effectively apply measures to prevent air, water and soil pollution, as well as waste generation and noise.

Other procedures in place at the Company for pollution incidents and/or management actions in the event of an emergency:

Emergency Management Plan. The purpose of this plan is to ensure an adequate response in the event of an emergency (fire, explosion or chemical spill at NG transmission system facilities). The Plan details coordination, communication plans, scope of emergency work, the scale, the sequence of rescue operations, the forces and resources required, etc.

Rules for Compliance with Environmental Protection Requirements. These rules define the management of environmental incidents involving spills of chemicals into the living environment, unplanned releases of NG during repairs of the main pipelines or accidents that may cause environmental hazards. The Rules provide for measures to manage these incidents, the Company’s actions and procedures for informing stakeholders.

E2-2 Actions and resources related to pollution

Modernisation of Jauniūnai and Panevėžys Gas Compressor Stations

In 2023, an efficiency improvement analysis of the Jauniūnai and Panevėžys gas compressor stations carried out by external consultants showed that the most appropriate way to reduce fuel consumption and emissions to ambient air at the stations was through the installation of new electrical units. In 2025, a contract was signed for the modernisation of the Jauniūnai gas compressor station; the works will last 42 months and commenced in autumn 2025. From 2029, the gas compressor units at the Jauniūnai compressor station will be replaced by new electric compressors that will not use fossil fuels and will take over the majority of the workload from the two remaining gas-fired compressors, which is expected to significantly reduce air pollution generated by this facility.

In accordance with Directive (EU) 2015/2193, as of 1 January 2030, emission limit values will apply to the compressor units or existing medium combustion plants at the Panevėžys gas compressor station (GCS). The permitted emission level of nitrogen oxides (NO_x) as of 1 January 2030 will be 250 mg/Nm³. Consequently, in order to comply with the new environmental requirements, replace technologically obsolete equipment and optimise the operation of the transmission system, Amber Grid will initiate the replacement of compressor units at the Panevėžys gas compressor station (installed since 1974) with new electrically driven gas compressors.

In 2025, an environmental impact assessment screening was carried out for the modernisation of the Panevėžys GCS. At the PDKS, the installation of one new electric compressor unit with an approximate nominal capacity of ~10 MW is planned, together with the associated equipment and construction works. In addition, the relocation of a compressor unit with a mechanical capacity of 11.5 MW from the Jauniūnai Gas Compressor Station to the Panevėžys Gas Compressor Station is planned.. The PGCS electric compressors are planned to be operational in 2030.

Resources allocated for the implementation of actions

The Company annually plans and allocates financial resources for air pollution monitoring in accordance with the frequency and scope established by legal requirements. The Occupational Safety and Environmental Department assesses the required scope of measurements, sets the budget, plans procurements, and carries out air pollution monitoring in accordance with valid contracts. These costs are budgeted annually along with other environmental monitoring measures.

E2-3 Targets related to pollution

Amber Grid has set targets to reduce air pollution by 2030. These targets are linked to Amber Grid’s long-term strategic direction to increase energy efficiency across all production processes and to the requirements of Directive (EU) 2015/2193, ensuring that emitted pollutants do not exceed the established limit values.

Below we provide information on the actions implemented in 2025 related to reducing and preventing air pollution, as well as progress made toward achieving the set objectives.

Area	Target	Base year, air pollution emission values	Target value	Actions carried out in 2025
Reduction of air pollution	Modernising the Jauniūnai GCS by 2029.	Base year 2022. Base year emissions: CO – 73 t. NO _x – 59 t.	Reducing Amber Grid's total annual air pollution emissions: CO – 40%, NO _x – 40%, compared to 2022.	Contract signed for the modernisation of the Jauniūnai GCS – design and installation of an electric compressor. Design and preparatory works initiated.
	Modernising the Panevėžys DKS by 2030	Base year 2022. Base year emissions: CO – 73 t. NO _x – 59 t.	Reducing Amber Grid's total annual air pollution emissions: CO – 60%, NO _x – 60%, compared to 2022.	Screening for Environmental Impact Assessment (EIA) carried out for the modernisation of the Panevėžys GCS. The EPA has taken a decision - no EIA is required. At the PDKS, the installation of one new electric compressor unit with an approximate nominal capacity of ~10 MW is planned, together with the associated equipment and construction works. In addition, the relocation of a compressor unit with a mechanical capacity of 11.5 MW from the Jauniūnai Gas Compressor Station to the Panevėžys Gas Compressor Station is planned.
Prevention of air pollution	Monitoring of emitted air pollutants	–	Ensuring that emissions comply with emission standards	The monitoring of emissions from the Panevėžys and Jauniūnai LCAs was carried out in accordance with monitoring programmes approved by the EPA. No exceedances of the established limits were recorded.

Note: Information on the financial resources for the implementation of the tasks (modernisation of the Jauniūnai and Panevėžys GCSs) is not provided in this section. These projects are included in the Group's GHG Emissions Reduction Measures Plan; therefore, to avoid double disclosure, data on financial resources allocated to these projects in the reporting year are presented under the climate change (E1) disclosures.

E2-4 Pollution of air, water and soil

The table below shows the emissions from the Company's air pollution sources as specified in Regulation (EU) 166/2006. Emission levels 2022–2025 remained within the limits established by this Regulation.

In 2025, emissions to ambient air were lower than in 2022, but higher than in 2024. In 2022, following the newly constructed GIPL (Gas Interconnection Poland – Lithuania) connection, the operation of the facilities had not yet stabilised and become fully clear; as a result, fuel consumption of the stationary units was higher, and accordingly, emissions to ambient air increased. From 2023 to 2025, stationary units at gas compressor stations, gas distribution stations, and in Vilnius operated more steadily, resulting in more efficient fuel usage. Nevertheless, in 2025, fuel-burning units at the Jauniūnai GCS operated more intensively than in 2023 or 2024, resulting in a slight increase in Amber Grid's total emissions to ambient air in recent years.



Calculation methodology. Data on air pollutants are collected using calculation methodologies specified in the IPPC and the Emission Permits, as approved by the Environmental Protection Agency (EPA). Air pollutant calculations are carried out on a monthly basis and the data is monitored and published in the Company's internal system reports.

Pollutants (excluding greenhouse gases)

Pollutant	Threshold for releases*	Pollutants released to air (kg/year)			
		2025	2024	2023	2022
Carbon monoxide (CO)	500,000	53,862	46,029	51,010	73,300
Nitrogen oxides (NO _x / NO ₂)	100,000	29,305	29,254	35,000	58,600

* In accordance with the release threshold laid down in Annex II to Regulation (EC) No 166/2006.

Monitoring of air pollution sources at the Panevėžys and Jauniūnai GCS is carried out in accordance with monitoring programs approved by the Environmental Protection Agency (EPA), following the requirements set out in the Environmental Monitoring Law and taking into account the conditions and requirements of the Integrated Pollution Prevention and Control (IPPC) system and the Emission Permits (EP). Monitoring of stationary sources of air pollution is carried out twice a year, in accordance with the approved monitoring programmes and taking into account the operating hours of the compressors.

Depending on the capacity of the facility, gas distribution stations measure air emissions from stationary air pollution sources (boilers) every 3–5 years to ensure proper operation of the equipment.

Periodic measurements are carried out by a laboratory authorised to carry out the necessary tests using accredited methods.

E2-6 Anticipated financial effects from pollution-related impacts, risks and opportunities

In line with the option for phased disclosure, the expected financial impacts related to pollution, risks, and opportunities are not disclosed at this time.

E4 Biodiversity

The Company’s infrastructure development and operation impact land and biodiversity, particularly during pipeline construction and maintenance activities. Therefore, the Company considers these topics as priorities and applies measures to manage impacts and related risks, which are described in the following sections of the report. Based on the results of the Double Materiality Assessment, the topics of land use changes, species population sizes, and land degradation were recognised as significant due to the use of primary raw materials, land restructuring, habitat fragmentation, and potential soil changes. This section provides an overview of the actual negative impacts and associated risks in these areas.

Impacts, risks and opportunities

Sub-topic: Land-use changes		
	Actual negative impact	The use of primary, non-renewable raw materials in infrastructure construction, linked to the environmental impacts of raw material extraction.*
	Actual negative impact	Changes in land structure and use due to pipeline construction (requiring excavation works that impact land and territories).
	Risk	Infrastructure development may disrupt ecosystems, potentially requiring biodiversity restoration measures that increase project costs.
Sub-topic: Species population size		
	Actual negative impact	Fragmentation of ecosystems and habitats due to the pipeline network, potentially affecting species population sizes.
	Risk	Implementation of legislative requirements, including EIA procedures and fees, can increase project costs and timeframes.
Sub-topic: Land degradation		
	Actual negative impact	Compaction of soil and mixing of soil horizons (layers) during pipeline installation and maintenance.
	Risk	Soil changes and erosion may occur when infrastructure installation requires additional slope reinforcement measures and investments.

Note: *For information on these impacts, see chapter E5 Circular economy (sub-topic: resource inputs).

For sustainability management and reporting purposes, this report provides an overall description of the management of the E4 Biodiversity topic, without breaking down actions and objectives into more detailed subtopics. At present, the Company does not have separate management measures applied to each sub-topic.

E4-1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model

Biodiversity conservation is one of the strategic objectives at the EPSO-G group level, aimed at ensuring that operations do not negatively impact biodiversity. In the Group's strategy, we are committed to achieving **zero net biodiversity loss in new projects**. To implement this strategic commitment, we plan to conduct a biodiversity and ecosystem assessment in 2026–2027 and develop an action plan outlining specific objectives, measures, monitoring indicators, and potential resources required to avoid and (or) mitigate negative impacts, as well as to restore and (or) compensate for biodiversity.

E4-2 Policies related to biodiversity and ecosystems

Policies applied to manage biodiversity topic are described in the section “MDR-P Policies adopted to manage material sustainability matters”.

In its **Environmental Policy**, the Company is committed to protecting biodiversity, monitoring it, and, when necessary, applying impact mitigation and compensation measures while developing and operating energy infrastructure. In its Sustainability Policy, the Company is committed to reducing the environmental impact of its activities.

The Group undertakes to protect biodiversity by monitoring biodiversity where necessary and, in the event of unavoidable objective circumstances, by providing and applying mitigation or compensation measures. These commitments aim to minimise or fully offset Amber Grid's impacts on biodiversity and ecosystems.

At present, it has not been determined whether our direct activities negatively affect species at risk of extinction. Species protection measures are implemented during the Environmental Impact Assessment (EIA) processes.

Following the principles of responsible operations, the Company is committed to addressing social consequences arising from impacts on biodiversity and ecosystems. Risks are continuously assessed, prevention plans are developed and a culture of zero environmental incidents is fostered. Attention is given to enhancing employees' environmental competencies and collaborating with local communities, stakeholders, and partners to ensure their engagement. Implemented environmental initiatives are publicly disclosed. The Company actively carries out environmental initiatives, engaging employees and enhancing their competencies in biodiversity conservation.

Pipeline and its protection zone adjacent to protected areas

The Company has identified no negative impacts on biodiversity from its sites adjacent to areas of vulnerable biodiversity. Based on the State Cadastre of Protected Areas, the table below provides information on Amber Grid's gas compressor stations (GCS), gas distribution stations (GDS), gas metering stations, and pipelines that, with a 25 m protection zone, enter, border, or cross protected areas and sites.

In total, the Company's stations are adjacent to 3 protected areas and, in accordance with the Cadastre of Rivers, Lakes and Ponds of the Republic of Lithuania, cross the Luponė stream.

The Company's main pipeline is located across the entire territory of Lithuania: it crosses 414 rivers, 9 ponds, enters the territory of 41 nature reserves, 2 botanical natural heritage sites, 5 biosphere polygons and 52 areas important for habitat protection.

When planning infrastructure reconstruction or expansion within our operations, the need for an Environmental Impact Assessment (EIA) or EIA screening is evaluated during the investment planning stage. If an EIA or EIA screening is required for a project, it is carried out during the project planning stage. Based on the results of the EIA or EIA screening, the potential impact on biodiversity is assessed and measures for prevention, mitigation, compensation, and restoration of impacts are identified. Where necessary, post-construction monitoring is also conducted in order to observe and ensure the recovery processes of the natural environment. Monitoring carried out from 2021 to 2025 for the GIPL pipeline showed that construction did not cause material negative environmental impacts. The studies have shown that the construction of the Polish-Lithuanian gas pipeline link has not materially affected existing natural grassland habitats of European Community (EC) importance. The vegetation of the EU-designated natural habitat near Vizgailiai village in the Lazdijai district was lost due to other human economic activities, when the area was ploughed and the field planted with corn. Biodiversity in GIPL areas recovers naturally: disturbed meadow areas regenerate naturally.

A balance of vegetation, green space and soil sealing is maintained in most Amber Grid sites and their surroundings. The sites are not fully paved – permeable gravel is widely used, and vegetation is maintained to the extent allowed by pipeline operation, fire safety, and legal requirements.

Boundaries of the pipeline and its buffer zone with protected areas

	Stations and protection zones	Gas pipeline and protection zone
Territories important for the protection of habitats	Out of scope	Valley of Minija River, Gerviraistis Swamp II, Anykščiai Pinewood, Daugyvenės neighbouring areas, Alioniai Swamp II, Marijampolis neighbouring areas, Gižai neighbouring areas, Noris River, Novėžis lower reaches, Kiemeliškės village neighbouring areas, Visinčia River near Gudeliai, Lapynai neighbouring areas, Karšuva Forest, Šešuvis River below Pašešuvis, Verknė middle reaches II, Rietavas Forests, Merkys River, Šventoji River midstream, Minijos River, Žalioji Forest, Pamūšiai, Žeimena river, Babtai-Varluva Forests, Būda and Pravieniškės Forests, Prienai Pinewood II, Noris loop neighbouring areas, Virinta River, Kazlų Rūda Forest IV, Minija River upper reaches, Žėbiškiai and Lomanka Forests, Veiviržas and Šalpė Rivers and valleys, Sabališkiai Forest, Kaunas Lagoon, Nomunas loops, Mera River and its valley, Širvinta River valleys II, Taujėnai-Užulėnis Forests, and Karajimiškis village neighbouring areas, Labūnava Forest, Laukesa I, Pagramantis Regional Park, Ažuolija Forest, Lavoriškiai Forest, Čerkiškė neighbouring areas, Strošiūnai Pinewood, Gubernija Forest, Naujakiemis neighbouring areas, Naujasis Lentvaris neighbouring areas, Kernavė neighbouring areas, Strošiūnai Pinewood II, Būdai Forest, Šešuoliai Forest
Biosphere polygons	Out of scope	Babtai-Varluva Forest Biosphere Polygon, Gubernija Forest Biosphere Polygon, Labunava Forest Biosphere Polygon, Būda-Pravieniškės Forest Biosphere Polygon, Taujėnai-Užulėnis Forest Biosphere Polygon
Biosphere reserves	Out of scope	Out of scope
Botanical objects of natural heritage	Out of scope	The areas of the Uogintai oak and Triliemenis oak.
Reserves	Karajimiškis landscape reserve	Veiviržas Ichthyological Reserve, Anykščiai Pinewood Landscape Reserve, Jūra Landscape Reserve, Kurkliai Geomorphological Reserve, Geomorphological Reserve of Vokė Old Valley Slopes, Punia Landscape Reserve, Merkys Ichthyological Reserve, Drubengis Botanical Reserve, Landscape Reserve of Minija Old Valley, Novėžis Landscape Reserve, Strošiūnai Landscape Reserve, Šventoji Ichthyological Reserve, Minija Ichthyological Reserve, Karajimiškis Landscape Reserve, Kulis (Grabijolai) Landscape Reserve, Judinis Geomorphological Reserve, Žeimena Ichthyological Reserve, the Great Nomunas Loops Hydrographic Reserve, Upytė Hydrographical Reserve, Šventininkai Botanical Reserve, Virinta Landscape Reserve, Daumėnai Geological Reserve, Tatula Landscape Reserve, Sabališkės Pedological Reserve, Pamūšiai Landscape Reserve, Minija River Breach Landscape Reserve, Praviena Hydrographical Reserve, Baravykinė Landscape Reserve, Daugyvenė Hydrographical Reserve, Verdeikiai Geomorphological Reserve, Jūra Ichthyological Reserve, Vokė
Parks	Biržai Regional Park Anykščiai Regional Park	Neris Regional Park, Biržai Regional Park, Varniai Regional Park, Anykščiai Regional Park, Sirvėta Regional Park, Nomunas Loops Regional Park, Pagramantis Regional Park, Kaunas Lagoon Regional Park

E4-3 Actions and resources related to biodiversity and ecosystems

Environmental monitoring after construction of the GILP pipeline

Amber Grid assesses and manages the impact of its operations on biodiversity through various measures: conducting environmental monitoring, preparing Environmental Impact Assessment (EIA) documents, and carrying out significance assessments for Natura 2000 sites. The Company complies with legal requirements, monitors environmental impacts and actively engages with stakeholders.

After the completion of the GIPL pipeline construction in 2022, a four-year post-construction monitoring of individual project sections was conducted in accordance with the environmental monitoring program agreed with the Environmental Protection Agency in 2016. Since the construction stages of the GIPL were completed at different times, the four-year post-construction monitoring for each section also took place over different periods, spanning 2021–2025.

The monitoring plan is not limited to monitoring the status of surface water bodies (the rivers Musė, Strėva and Lapainia). It also covers monitoring of the landscape and state of birds (western marsh harrier, Montagu's harrier, spotted crane, common crane, lesser spotted eagle, black stork, middle spotted woodpecker), fish (protected species in the Strėva, Verknė and Lapainis rivers: Thymallus thymallus, Alburnoides bipunctatus, Amur bitterling, Spined loach, European bullhead), insects Geranium argus, False heath fritillary, Woodland brown, Large white-faced darter, Large copper) reptiles European pond turtle, European fire-bellied

toad); emergence, spread, and vegetation cover of invasive species (*Heracleum sosnowskyi*, Boxelder maple, Large-leaved lupine, Canada goldenrod).

Changes to natural habitats of European Community (EC) importance in the area affected by the pipeline are also being recorded and assessed following the construction of the GIPL link. The number of plant species remained almost unchanged during the monitoring period, and no significant changes in the composition of the flora were detected. This indicates that the damaged part of the habitat meadow is recovering and that the restoration process has already started.

In the monitored habitats along the GIPL sections, the soil was ploughed, leveled, and seeded with a grass mixture after construction. In the first year of monitoring, some sections showed signs of water erosion and remaining tracks from construction machinery.

During the 2022 monitoring, herbaceous vegetation along the pipeline route on the right bank of the Stréva River had not fully regrown, and shallow rills caused by water erosion (30 × 5 m) were observed. The geotextile laid in place served an anti-erosion function. Few signs of erosion were observed on the left bank of the Stréva River. The slopes of the Dindžiaké and Punelė river valleys were reinforced with geotextile and field stones. By 2022, they were becoming overgrown with tussock grasses, and the turfing process helped protect the soil from erosion. In the Verknės River, no signs of landscape or shoreline disturbance were observed, and no erosion was observed.

Re-monitoring of the vegetation cover in 2024 showed that the meadow areas disturbed during construction are naturally recovering, the renaturalization process has already begun, and typical grass species are starting to reappear. Data from the four-year monitoring of different stages (2021–2025) indicate that the construction of the main gas pipeline connection between Poland and Lithuania did not have a significant impact on vegetation or soil, and these environmental components are naturally recovering.

During construction or reconstruction works, we always plan how the soil and vegetation will be preserved—or restored where preservation is not possible. The conditions for these processes are specified in the Environmental Impact Assessment, the EIA screening, the construction work plan, and other related documents. Before commencing construction or reconstruction works, during the project design stage (and in some cases—already in the investment project), we assess all potential environmental impacts, including those on soil, and identify possible preventive or mitigation measures to address negative effects. The Company always aims first to prevent pollution or other negative environmental impacts, and where this is not possible, to minimise such impacts.

Resources allocated for the implementation of actions

The Company plans and uses financial resources for biodiversity impact management according to project needs. During the investment project preparation stage, we assess whether an Environmental Impact Assessment (EIA) is required and preliminarily plan its budget. If an EIA is necessary, the project manager includes the relevant costs in the project budget and coordinates the preparation of the EIA. Environmental monitoring (e.g., for the GIPL) is planned in accordance with legal requirements and carried out according to pre-arranged contracts.

The total costs of EIAs and monitoring for 2022–2025 are presented in the table. For ongoing projects, no EIA is currently required, and therefore no additional resources have been allocated.

Expenditure for Environmental Impact Assessment and post-construction monitoring

Year	For EIA preparation and screening, Eur (excl. VAT)	GIPL for post-construction monitoring, Eur (excl. VAT)
2022	6,428	4,300
2023	0	4,300
2024	0	4,300
2025	14,212	2,800

E4-4 Targets related to biodiversity and ecosystems

The Company’s key objectives and the methodology for their determination are disclosed in the “Strategy, Business Model, and Value Chain” section of this report.

Currently, we have not set specific objectives or allocated resources to systematically manage the negative impacts of our operations on biodiversity and ecosystems. At the Group level, our strategy is to ensure zero net biodiversity loss in new projects. To implement this strategic commitment, we plan to develop a Biodiversity and Ecosystem Analysis and Action Plan between 2026 and 2027, which will identify specific targets, measures, monitoring metrics and potential resources needed to avoid, mitigate, restore and (or) compensate for negative impacts.

The Group aims to prevent adverse impacts on biodiversity by following a hierarchy of avoidance and mitigation measures and by implementing the commitments described under disclosure requirement E4-1.

E4-5 Impacts metrics

The Company has not yet established impact metrics related to biodiversity and ecosystems. We monitor and manage our impacts on biodiversity and ecosystems (see E4-2 and E4-3). Amber Grid organizes its operations in accordance with an environmental management system compliant with ISO 14001, which ensures compliance with legal requirements, identifies and controls negative environmental impacts, continuously improves environmental performance, and manages risks and emergency situations.

E4-6 Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities projected

In accordance with the permitted phased disclosure provisions, the expected financial impacts related to Biodiversity, risks, and opportunities are not disclosed at this time.

E5 Circular economy

The development and operation of gas transmission infrastructure require significant equipment and raw material resources, and generate waste during operations. Therefore, the Company considers these topics important for both operational efficiency and environmental impact. Accordingly, when planning its activities, the Company integrates resource use and waste management aspects and applies measures to manage impacts and associated risks. Based on the results of the Double Materiality Assessment, the topics of resource inflows and waste were identified as material due to the high material demand for infrastructure projects, waste generation, and potential cost fluctuations. The following provides an overview of the actual negative impacts and associated risks in these areas.

Impacts, risks and opportunities

Sub-topic: Resource inflows		
	Actual negative impact	Developing and operating gas transmission infrastructure is equipment-intensive and consumes a lot of raw materials.
	Risk	Price increases in resources such as steel and metals, leading to higher infrastructure project costs.
Sub-topic: Waste		
	Actual negative impact	Generation of hazardous and non-hazardous waste during direct operations.
	Risk	Although small waste volumes and recycling opportunities can reduce risks and create a positive impact (with a large share of waste being directed to recycling), non-recyclable waste is still generated.

E5-1 Policies related circular economy

Policies applied to manage use of resources and circular economy are described in the section “MDR-P Policies adopted to manage material sustainability matters”. We manage the impacts related to resource use and the circular economy by implementing the Group’s Environmental Policy, Sustainability Policy, and Partner Code of Conduct.

In the Environmental Policy, we commit to following pollution prevention principles, reducing the amount of waste generated in our operations, and ensuring its safe and responsible management. The Sustainability Policy emphasizes consistently minimizing the environmental impact of our activities. We also promote the application of these principles throughout our supply chain.

The Partner Code of Conduct sets out obligations for partners to apply circular economy principles, pursue responsible and environmentally sustainable sourcing of raw materials, encourage reuse, use secondary raw materials, ensure efficient use of natural resources, manage waste properly, and strive to reduce the amount of waste generated by their operations.

The Group’s strategy prioritises circular procurement practices. Efficient resource use and the implementation of circular economy principles are key aspects of our sustainability direction. However, at present, we do not have a Group-level business model integrating circularity principles. In the future, we plan to strengthen this area by detailing policies, objectives and implementation measures.

E5-2 Actions and resources related to resource use and circular economy

We do not currently have an approved action plan for resource use and the development of the circular economy; however, we are already implementing circular economy principles in our operations, focusing on waste prevention, reuse, recycling, and extending the lifecycle of resources.

Reuse and recycling of resources



- During maintenance and repair of natural gas pipelines, removed components (e.g. metal pipes) are directed for recycling. All metals from the pipelines replaced between 2024 and 2025 have been transferred to metal recyclers.
- We only pass on end-of-life pipeline components to waste managers when the materials no longer meet the specified technical requirements. This reduces the need for primary raw materials and promotes closed-loop solutions.

Reuse of office assets



When replacing office furniture, we organize auctions for decommissioned assets, allowing employees to purchase items and give them a second life. Unsold furniture is handed over to waste management companies for recycling. In 2025, 50 office furniture items and 29 IT equipment units were sold, and 46 vehicles were donated to Ukraine; in 2024, 98 office furniture items and equipment were sold; and in 2023, 50 units of decommissioned assets (trailers, car parts, etc.) were sold.

Waste management and contractors' obligation



- Waste generated during operations is sorted and handed over to waste management companies. We prioritise recycling and reuse, aiming to return as much material as possible to the economic cycle.
- Dismantled equipment parts suitable for reuse are stored and reused in maintenance and repair activities, reducing the need for new raw materials.
- Contractors working at our infrastructure sites are required to sort waste at the point of generation and report its transfer to waste management companies.

Strengthening a Sustainable Supply Chain



- In 2025, we developed the Group’s Partner Code of Conduct, updated the partner due diligence process, and upgraded supplier evaluation information systems, integrating circular economy and resource efficiency principles.
- At the Group level, in 2025 we launched the development of a sustainable supplier engagement program, carrying out an initial analysis and defining new sustainability and economic efficiency criteria for supplier selection.
- From 2026 to 2028, we plan to further expand sustainable procurement practices and the application of circular solutions throughout the supply chain.

E5-3 Targets related to circular economy

The Company's key targets and the methodology for setting them are disclosed in the "Strategy, Business Model and Value Chain" section of this report.

At present, the Group has not set quantitative or time-bound targets for systematically implementing circular economy principles and improving resource efficiency. Recognising the materiality of this sustainability topic and its links to reducing environmental impact, operational efficiency, and value chain resilience, we plan to strengthen this area in the future.

Although targets have not yet been established, we already monitor the effectiveness of managing this topic through operational indicators and processes. Within the Group, we regularly collect and analyse data on the use of key resources and the generation and management of waste, including:

- Quantities of materials to be consumed (E5-4 Resource inflows);
- Quantities of waste generated and the ways in which it is managed (E5-5 Resource outflows);
- Application of measures for reuse, recycling, and extending the lifecycle of resources (E5-2).

These metrics provide an assessment of trends and developments and provide a basis for setting future targets for the circular economy and resource efficiency.

We monitor and manage resource use and waste generation and related impacts. Amber Grid organises its operations in accordance with an environmental management system compliant with ISO 14001, which ensures compliance with legal requirements, identifies and controls significant impacts related to the use of raw materials, resources, and waste, continuously promotes more efficient resource use, prevents waste generation, and encourages recycling.

E5-4 Resource inflows

To ensure the safe and reliable operation, maintenance, and repair of the gas transmission network, the Company uses various technical and chemical materials, as well as equipment, in its operations. These are selected and used in accordance with high quality and sustainability standards, aiming to optimize operational processes and minimize environmental impact.

An analysis of Amber Grid's resource inflows data for 2025 highlights the most material inflows by weight in the following categories:

Resource inflows	Measurement units	2024 ¹	2025	Change 2025/2024, %
Construction and plumbing materials	t	N/A	115.36	–
Gas transmission system infrastructure materials		N/A	81.24	–
Chemicals		N/A	15.66	–
Medicines, hygiene products, etc.		N/A	1.59	–
Non-capitalised inventories, tools, and other items		N/A	0.86	–
Protective clothing, footwear, and other personal protective equipment		N/A	0.45	–
Electrical materials and electrical appliances		N/A	0.19	–

¹No data were collected for resource inflows in 2024, so no historical data are available. In 2026, an analysis will be carried out to obtain resource inflows data for historical resources.

Main technical materials used (resource inflows):

- Building and plumbing materials: materials needed for the reconstruction of building infrastructure, sand, rubble, pipes;
- Gas transmission infrastructure materials (metal parts): pipeline sections, valves, couplings and other critical components needed to maintain and upgrade network infrastructure; insulation materials and sealants used to protect and seal pipelines;
- Chemicals: lubricants for equipment, odorants, paints, and other chemical agents, the use of which is optimized to minimize environmental impact;
- medicines, hygiene products: providing outdoor workers with towels, wipes, over-the-counter medicines, first-aid kits, peroxide for wound cleaning, etc;

- Non-revenue inventories, tools, other: miscellaneous spare parts, nozzles, tapes, buckets, batteries, small tools (brooms, grinding wheels, etc.), larger tools and appliances (saws, pumps, soldering irons, gas detectors, etc.);
- Special workwear, footwear, and other protective equipment: gloves (for welding, mechanical protection, insulated, etc.), helmets, half-boots, shirts, vests, trousers, jackets, goggles, protective suits, rescue ropes, etc.;
- Electrical goods, electrical appliances: cordless angle grinders, chainsaws, blowers, battery amplifiers, heaters, voltage inverters, other battery-powered equipment, batteries, and a variety of cables for electrical work.

Major equipment used for network maintenance and repair:

- Heavy machinery required for pipeline installation, refurbishment, and earthworks: excavators and cranes;
- Equipment to support operations: compressor units, boilers, generators, and other devices required to maintain energy supply and network stability;
- Vehicles: trucks, specialised vehicles for transporting equipment and materials to the sites; cars for employee mobility;
- IT equipment: digital monitoring systems for real-time network monitoring, data analysis and rapid response to disturbances.

The Company continuously reviews and improves the processes for the use of materials and equipment to ensure operational efficiency, comply with environmental requirements, and contribute to the sustainable development of the gas transmission network.

The main resource required for the Company's operations is natural gas. In 2024, 87,159 MWh of natural gas was consumed for technological and other needs, and in 2025 – 106,163 MWh.

Methodology for calculating resource inflows

The Company records resource inflows or purchased materials and services in the Asset Management System. In 2025, data on purchases, quantities and additional information (name, item group) were exported from the Asset Management System.

Some goods were purchased by weight (kilograms or tonnes), therefore their weights are presented without additional calculations. Other goods were purchased in various units (units, metres, cubic metres, pairs, packages, etc.); therefore, an analysis was carried out for those items whose weight could be calculated, and an assessment was made to determine which goods were purchased in the largest quantities (by units).

The following weight estimation and (or) calculation actions were performed:

- all chemical substances purchased in litres (e.g. lubricants) have safety data sheets, which are publicly available or stored in the Company's operations manual. Safety data sheets specify the density of chemical substances, which is used to calculate their weight;
- bulk purchases of medicines and hygiene products were evaluated by weighing a single package and multiplying it by the total quantity purchased. Some medicines and products have their weights written on the packaging, so they were not weighed;
- special workwear, footwear and other protective equipment purchased in large quantities were evaluated by weighing a single pair or package and multiplying it by the total quantity purchased. The weights of some protective equipment are indicated on the packaging; therefore, they were not weighed;
- electrical goods (cables) purchased in bulk were assessed based on the weight per metre or kilometre provided in the manufacturer's publicly available technical specifications, multiplied by the total length of cable purchased.

In 2026, efforts will be made to further improve the methodology for identifying significant resource inflows and for calculating and estimating their weights, as well as to disclose additional categories of goods.

E5-5 Resource outflows

The company operates in the natural gas transmission sector and therefore deals with specific waste streams, including metal, construction, insulation materials, oil products, and electronic waste. All waste is sorted and transferred to certified waste recyclers or managed in accordance with hazardous waste management requirements. In this way, we aim to reduce environmental impact and promote the implementation of circular economy principles.

Metal waste generated during the replacement of sections of the main gas pipeline is handed over to specialised metal collectors. We regularly receive waste stream data from waste managers and recyclers, based on official waste transfer notes from contractors and licensed waste collectors.

These processes ensure transparent waste management and contribute to the Company’s commitment to operate responsibly and sustainably, reduce environmental impact, and use natural resources efficiently.



Calculation methodology. The amount of hazardous and non-hazardous waste generated is recorded in the Unified Product, Packaging and Waste Record Keeping Information System (GPAIS). The consolidated data were processed on the basis of the Company's GPAIS reporting data and information received from waste managers and (or) collectors on recycling and (or) other forms of waste management.

Waste from operations

Waste generated in tonnes				
	2025	2024	2023	2022
Total quantity	194.83	456.74	3,076.75	1,170.24
Hazardous	12.88	25.61	40.76	28.66
Non-hazardous	181.96	431.13	3,035.99	1,141.58
Waste diverted for recycling				
Total quantity	134.28	402.89	3,041.63	1,102.63
Hazardous	0.17	0.00	13.79	12.53
Non-hazardous	134.11	402.89	3,027.84	1,090.11
Waste diverted to secondary recovery				
Total quantity	not available	not available	not available	not available
Waste diverted to other recovery operations*				
Total quantity	41.81	14.83	0.00	0.00
Hazardous	9.96	0.88	0.00	0.00
Non-hazardous	31.85	13.95	0.00	0.00
Waste sent for disposal (incineration with energy recovery)				
Total quantity	16.95	28.38	32.77	39.57
Hazardous	2.75	15.72	26.97	16.14
Non-hazardous	14.20	12.66	5.80	23.43
Waste sent for disposal (landfill)				
Total quantity	1.79	1.57	2.35	28.04
Hazardous	0.00	0.00	0.00	0.00
Non-hazardous	1.79	1.57	2.35	28.04

Notes: The Company's operations do not generate radioactive waste.

According to the report provided by the waste recycler, and in accordance with the Waste Management Rules and waste disposal codes, most of the waste is classified under code R12. This means that the waste is directed to other recovery operations – it is either recycled or its composition is modified before any of the R1–R11 operations are carried out. R codes (R1–R12) refer to waste recovery – this can include recycling, regeneration, or other forms of reuse.

In 2025, compared to 2024, the amount of hazardous waste was reduced by half, and accordingly, the total quantity of waste also decreased by more than half. The waste flow and its quantity largely depend on the projects and maintenance works carried out during the reporting year. Considering the smaller scope of MD reconstruction projects carried out in 2025, a lower amount of waste generated was also recorded. In addition, when purchasing goods for the Company’s operations, we seek more environmentally friendly alternatives for both the products and their packaging. This allows us to reduce hazardous waste and divert more waste to recycling or other recovery operations.

More than 51% of the waste generated by the Company consists of iron and steel waste, which arises during the reconstruction of the Company’s infrastructure. Approximately 27% of the total waste consists of inert non-hazardous concrete and mixed construction and demolition waste. 43% of this waste is sent for recycling, while the remaining 56% is directed to other recovery operations (e.g., shredding), after which it can be used in road construction or other applications. Approximately 13% consists of mixed municipal waste – after additional sorting, 56% of this waste is sent for incineration to recover energy.



As in previous periods, in 2025 the majority (90%) of waste was diverted to recycling and other recovery operations.

Non-recycled waste

Non-recycled waste		
	Total quantity, t	Share, %
2025	18.75	9.62
2024	29.95	6.56
2023	32.12	1.14
2022	67.61	5.78

Notes: Non-recycled waste refers to the amount of waste sent for disposal. In this case, according to the ETAS standard definition, non-recycled waste refers to waste that was not directed to recycling or recovery operations, but was disposed of.

The amount of non-recycled waste decreases each year, which means that waste is being directed to other management methods, maximizing the recovery of useful resources whenever possible. Although the share of non-recyclable waste in the total stream was higher in 2025 than in previous years, the overall quantity of waste is decreasing, the quality of sorting is improving, and a responsible approach to waste management by the Company and its contractors is being established.

E5-6 Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities

In accordance with the permitted phased disclosure provisions, information related to financial impact is not currently provided.

6.3. Social area

S1 Own workforce

The operations of Amber Grid are based on the competencies of highly qualified employees, a safe working environment, and a responsible approach to employee well-being. Based on the results of the Double Materiality Assessment, sustainability topics related to the Company’s own workforce were recognised as material, as they directly affect employee well-being, business continuity, service reliability, and the Company’s ability to achieve its strategic objectives.

For sustainability management and reporting purposes, the Company’s material sustainability topics and subtopics related to its own workforce are grouped in this report into the following main areas:

- 1. Employee well-being and working conditions.** This area covers matters related to fair and safe working conditions, employee engagement, professional development, and social protection, including:
 - Gender equality and equal pay for work of equal value;
 - Diversity and non-discrimination;
 - Employment and inclusion of people with disabilities;
 - Working hours and Work-life balance;
 - Fair remuneration;
 - Training and skills development;
 - Compliance with human rights in employment relationships.
- 2. Safety and health.** Considering that the Company’s operations involve technologically complex processes and potentially hazardous infrastructure, occupational safety and health are among the priority sustainability topics. This area encompasses both occupational risk management and preventive measures aimed at reducing accidents, occupational diseases, and work-related stress.

3. **Privacy.** The Company recognises and protects employees' right to privacy and protection of personal data. The topic of privacy covers the processing of personal data in employment relationships, the use of information systems and the security of employee data.

Employee well-being and working conditions

The following section presents an analysis of the impacts, risks, and opportunities in the area of employee well-being and working conditions. It was prepared based on the results of the Double Materiality Assessment and covers both actual and potential negative and positive impacts, associated risks, and identified opportunities.

Sub-topic: Working hours; work-life balance		
	Actual negative impact	High workload, shift work and on-call duties, particularly in technical positions, may affect employee well-being and work-life balance.
	Risk	Employee turnover due to poor work-life balance (which may lead to project delays, additional costs, and potential reputational damage for the Company).
Sub-topic: Adequate wages		
	Actual positive impact	Transparent and fair remuneration system, above the minimum wage, published average salaries.
	Risk	As the demand for energy sector workers grows, attraction and retention costs may increase.
Sub-topic: Social dialogue, freedom of association and collective bargaining		
	Actual positive impact	Collective agreements, trade unions, and open communication enhance employee engagement.
	Risk	Insufficient social dialogue (may lead to disputes, increased employee turnover, project delays, and potential funding risks).
Sub-topic: Training and skills development		
	Actual positive impact	Access to training and development programs enhances employee skills and engagement.
	Opportunity	Competency development initiatives (e.g., collaboration with Lithuanian Ministry of Energy) help retain specialists and reduce the need for new hires.
Sub-topic: Gender equality and equal pay for work of equal value		
	Actual negative impact	Risk of gender imbalances and pay gaps in the same or similar positions.
	Risk	Violations of equal opportunities (may harm the Company's reputation, lead to lawsuits, and increase employee turnover).
Sub-topic: Employment and inclusion of people with disabilities		
	Actual negative impact	Limited inclusion of people with disabilities, considering the nature of operations and specific infrastructure.
	Opportunity	Increasing inclusion and diversity can improve the Company's reputation, boost employee engagement, and reduce recruitment costs.
Sub-topic: Diversity		
	Actual negative impact	Limited diversity in age, experience or competences in certain functions.

	Risks	Shortages of skills and talent due to insufficient diversity (may hinder project implementation).
Sub-topic: Measures to combat violence and harassment in the workplace		
	Potential negative impact	Potential cases of misconduct, harassment, or psychological abuse may affect employees' well-being and retention.

S1-1 Policies related to employee well-being and working conditions

The key principles guiding our efforts to ensure employee well-being and proper working conditions are established in the Equal opportunities policy, the Employee remuneration, performance management and development policy, and the Partner Code of Ethics. Further information on the implementation of these policies is provided in the section “MDR-P Policies adopted to manage material sustainability matters”.

The Employee Equal Opportunities Policy establishes the Group's commitment to ensuring that the principles of equal opportunities and non-discrimination are applied across all areas of employment (including non-discrimination on the grounds of racial or ethnic origin, skin colour, sexual orientation, gender identity, disability, age, religion, political opinion, nationality or social origin, and other forms of discrimination), and that employment-related decisions are based on competence, qualifications and professional merit. We maintain a zero-tolerance approach to any form of discrimination, harassment or violence, ensure safe, respectful and inclusive working conditions, and implement preventive and response measures, including confidential reporting channels and whistleblower protection.

In line with **Employee remuneration, performance management and development policy**, we ensure a fair, transparent and equal opportunities-based remuneration and career framework applicable to all employees. Performance management and development are aligned with clear objectives, competence enhancement and professional growth, with the aim of attracting,

We apply not only internal policies but also a consistent program framework that ensures employee growth, leadership development, an inclusive organizational culture, and business continuity.

Inclusion and human rights

- **Diversity and inclusion strategy.** We aim to create an inclusive, respectful and equal opportunities-based working environment, promote tolerance, value diverse experiences, and foster a strong organisational culture.
- **Human rights management.** We have embedded human rights governance in our Equal opportunities policy, while measures for the prevention, monitoring and remediation of human rights impacts are described in the section “Processes, measures and mechanisms for monitoring, protecting and remediating equal opportunities, human rights harm, and impacts on particularly vulnerable and marginalized groups”.

Competence and leadership development

- **Future competence building programme.** We identify the priority competencies needed to implement the business strategy and purposefully invest in their development.
- **Replacement programme.** We ensure continuity of leadership and critical positions, develop internal leaders and build a sustainable talent pool, and strengthen the Group's ability to respond to continuous change.
- **Mentoring programme.** We strengthen the leadership competencies of future leaders and specialists, promote the transfer of experience, and foster consistent talent growth within the Group.
- **Learning Directory.** We implement a learning program aimed at developing employees' leadership, professional, and general competencies.

Work organisation and social dialogue

- **Remote work arrangement.** We establish principles for granting and organising remote work, define employees' rights and responsibilities, and set requirements for information and cyber security, creating conditions for flexible and secure work.
- **Collective bargaining agreement.** Collective bargaining agreement establishes additional social benefits, employee rights, and principles of social dialogue, ensuring fair and transparent working conditions.

No risks of human trafficking, forced labor, or child labor have been identified in our operations, and they are not considered significant. Therefore, we do not currently apply separate policies on these topics, in accordance with national and international legislation.

S1-2 Processes for engaging about impacts and S1-3 Processes and channels for remediation of negative impacts

The Company implements consistent employee engagement processes to identify, understand, and manage actual or potential impacts on employees, while enabling them to influence decisions regarding working conditions, well-being, and their rights. The inclusion processes apply to all employees of the Company, regardless of their position or workplace. Every employee is free to express their opinions, make suggestions, and raise work-related issues without fear of negative consequences.

The main systematic employee engagement tool is the annual employee engagement survey, which assesses engagement levels, empowerment, satisfaction with the work environment, leadership, and organizational culture. The survey results are presented to the Company’s management, analysed to identify risks and areas for improvement, and used to enhance business processes and internal decision-making.

Additionally, employee engagement is ensured through staff meetings, roundtable discussions, annual one-on-one meetings with their line managers, trade union activities and the collective bargaining agreement, as well as anonymous reporting channels.

These processes allow for the systematic collection of employee feedback, the identification of potential negative impacts, and the timely implementation of preventive or corrective actions. An overview of the engagement processes is given in the table below.

Processes and channels	Description
Annual employee engagement survey and other surveys	<p>To systematically assess organizational culture, employee experience, and identify areas for improvement, the organization conducts an annual employee engagement survey. The survey measures whether employees feel involved in decision-making, the extent of their engagement and empowerment, how effectively the Company ensures equal opportunities, and whether a tolerant and respectful workplace culture is maintained. Employees can comment anonymously and share their views. The survey invites employees to assess not only the Company but also their direct supervisor, their empowerment, and their level of engagement.</p> <p>All employees are eligible to participate in the survey, so this tool provides a comprehensive overview of employees' views and opinions on a wide range of matters. The survey results are presented to both employee representatives and all employees, and are subsequently analysed and used to improve business processes.</p>
Employee meetings	<p>The Company periodically holds staff meetings to present key updates, share news, communicate achievements, and outline objectives. During the meetings, employees are encouraged to participate actively, ask questions of concern, and share their views, thereby fostering a culture of open dialogue and communication.</p>
Roundtable discussions	<p>This is a new form of engaging employees and their representatives in discussions on various topics relevant to them. Its purpose is to gather broader opinions and suggestions in an informal meeting format, and to apply this feedback to improve processes or inform decision-making.</p>
Equal opportunities policy and Diversity and inclusion strategy	<p>Employee representatives are encouraged to engage in the implementation of the Equal opportunities policy, promote diversity, and raise awareness on the topic. The Diversity and inclusion strategy provides for the comprehensive integration of employee engagement measures - incorporating employee representatives in assessing employee needs and in discussions on how to improve the work environment and adapt it to the needs of individuals with diverse requirements.</p>
Code of Conduct	<p>The Code promotes cooperation between employees and management based on respect, transparency and openness.</p>
Anonymous reporting channels	<p>The Company has anonymous reporting channels. These channels provide employees with the opportunity to anonymously report issues related to the work environment or potential violations of their rights, the Code of Conduct, or the Equal opportunities policy.</p>

Processes and channels	Description
Annual interviews with line managers	Individual meetings to discuss the employee's contribution, professional development and aspects of improving the working environment.
Collective bargaining agreement	The Company has a collective bargaining agreement with the trade union (employee representatives) that specifies cases in which information must be provided and consultations held regarding planned workforce changes. This includes reorganizations, changes to the compensation policy, and other decisions that may affect employees' interests. Collaboration is coordinated by the Head of the Organizational Development Department. From 2023 to 2025, quarterly meetings were held with trade union representatives. These meetings covered the implementation of the collective bargaining agreement, Employee engagement survey results, Remuneration policy, and other important topics.

Amber Grid has implemented processes to prevent, identify, address, and remediate negative impacts on employees. If the Company's activities cause negative impacts or instances of misconduct occur, employees are provided with safe, confidential, and consequence-free opportunities to raise concerns and report them.

Processes, measures, and mechanisms for monitoring and remediation related to equal opportunities, human rights impacts, and the protection of particularly vulnerable and marginalised groups

We implement comprehensive mechanisms to ensure and strengthen the principles of equal opportunities, inclusion, human rights, and the protection of vulnerable groups:

- Adhering to the Equal opportunities policy, the Procedure for the prevention of discrimination, harassment and violence, the Code of Conduct, the Diversity and inclusion strategy, and the Labour Code of the Republic of Lithuania. These documents establish the principles of non-discrimination, respect, inclusion, and equal opportunities applicable to all employees and candidates, and ensure the right to participate in decision-making and to have equal career opportunities.
- Organising regular training for managers and employees on equal opportunities, diversity, and human rights, enhancing competencies and preventing discrimination and inappropriate conduct. Adapting working conditions, working hours, and the work environment to individual employee needs where required, using flexible arrangements and technical solutions.
- Ensuring social dialogue through functioning works councils and trade unions, representing employees' interests and engaging in consultations with the employer. Publishing policies, procedures, and training materials on the intranet, providing all employees with easy access to relevant information.
- Integrating human rights, non-discrimination, and workplace ethics principles into supply chain management and the partner Code of Conduct, setting requirements for suppliers and other business partners.
- Monitoring the implementation and effectiveness of policies to ensure a safe and respectful work environment, conducting annual employee engagement surveys to identify risks and issues, and applying corrective measures.
- Appointing responsible persons for human rights and equal opportunities matters, ensuring that all potential violations are properly investigated and, if confirmed, corrective measures are applied, including consultations, psychological support, and adjustments to working conditions.

- Implementing anonymous and confidential whistleblowing systems, enabling employees to safely report potential violations, recording and investigating received information according to established procedures, and using the results to improve processes and prevent negative impacts.

Whistleblowing channels

Reports of potential violations or negative impacts can be submitted through the following channels:

Amber Grid Trust line: sauga@ambergrid.lt

EPSO-G Trust line: pranesk@epsog.lt

E-reporting form: <https://pranesk.epsog.lt>

Telephone: +370 612 70606

Mail: Company's registered office at (Laisvės pr. 10, Vilnius)

Directly to responsible persons:

- prevention specialist (employee responsible for corruption prevention),
- employee responsible for ensuring equal opportunities,
- employees acting as deputies, in case the responsible persons are temporarily unavailable.

To the line manager, when the issue relates to the work environment, interpersonal relationships, or business processes.

These channels are available to all Company employees. Reports can be submitted by individuals who have directly experienced a negative impact, as well as by employees who have observed misconduct or received information about potential violations. Reports can be submitted anonymously or with the reporter's identity disclosed, depending on the chosen channel.

Additionally, employee suggestions and concerns are conveyed to the Company by the **trade union**, ensuring constructive dialogue between employees and management.

Handling of Reports

The Company, through integrated monitoring and effectiveness-assurance processes, strives to ensure that reporting channels are lawful, accessible, transparent, and grounded in the protection of employees' rights. All received reports are reviewed using mechanisms established at the EPSO-G group level. This ensures timely responses, objective assessment of the situation, application of proportionate corrective actions, and, when systemic risk factors are identified, strengthening of preventive measures.

Protection of whistleblowers

We protect whistleblowers in accordance with applicable legislation and Group-wide requirements. The Company guarantees that reports will be handled safely and confidentially, and that individuals submitting information about potential violations will be protected from any negative consequences. Detailed information on whistleblower protection principles and applied mechanisms is provided in the G1-1 disclosure section of this report.

S1-4 Actions taken for managing matters related to own workforce

The Company implements consistent and purposeful actions to manage impacts, risks, and opportunities related to employees. These actions aim to ensure employee well-being, promote professional development, create a safe and supportive work environment, and guarantee equal opportunities.

Diversity, equality and inclusion

The implemented initiatives have helped increase employee engagement, strengthen trust in the organization, and consistently apply policies related to equal opportunities and inclusion in practice.

Area	Actions and initiatives implemented in 2025
Diversity, equality and inclusion	<ul style="list-style-type: none"> Ongoing implementation of the Diversity and inclusion strategy. To foster a culture of respect, equality and inclusion, the Group became a member of the Diversity Charter Association.
	<ul style="list-style-type: none"> Amber Grid was recognised for its consistent work in the field of equal opportunities and was awarded three Equal Opportunities Wings.
	<ul style="list-style-type: none"> Continuation of the annual Diversity, equal opportunities, and inclusion month initiative. In November 2025, themed events on gender equality, stereotype awareness, mental health, and respectful workplace culture were held, promoting open dialogue, knowledge sharing, and raising employee awareness.
	<ul style="list-style-type: none"> The Group also held a discussion on the situation of equal opportunities, diversity and inclusion, where employees shared experiences, discussed key issues, and identified areas for improvement. Insights from the discussion informed the planning of further initiatives.
	<ul style="list-style-type: none"> Amber Grid has joined DUOday, an international initiative to include people with disabilities into the labour market. Participation in the initiative has helped to practically apply inclusion principles while strengthening the organization’s culture of openness.

The Company had no confirmed cases of discrimination, harassment, or mobbing between 2023 and 2025.

The actions implemented provide a foundation for further strengthening equal opportunities and inclusion, and will continue to be pursued in the future, taking into account employee needs, gathered insights, and identified risks. We plan to continue the ongoing initiatives and take new actions to enhance equal opportunities, transparency, and inclusion.

Area	Plans for 2026
Diversity, equality and inclusion	<ul style="list-style-type: none"> Start implementing the requirements of the Pay Transparency Directive: develop and implement a pay transparency monitoring methodology, conduct a pay analysis, and integrate pay transparency principles into core HR management processes.
	<ul style="list-style-type: none"> Begin monitoring gender-based shift coverage, track the dynamics of female representation, and monitor leadership-related shift indicators, including the representation of women in managerial roles.
	<ul style="list-style-type: none"> Launch the training cycle “Collaboration and inclusive communication,” and incorporate the “Inclusive language” workshop into the Company’s ongoing employee development catalogue.

Employee engagement

To systematically assess organizational culture, gauge employee satisfaction with their work and the Company, evaluate recent changes, and identify areas for improvement, the Company conducts an annual employee engagement survey. The Company aims to implement measures that ensure a minimum employee engagement level of 70%.



The employee engagement rate was 75% in 2025, 69% in 2024 and 72% in 2023.

In 2025, 94% of employees participated in the survey. This shows that employees are highly engaged, interested and willing to contribute to the organisation's improvement.

The survey assesses key aspects of the working environment. These include cooperation, performance, empowerment, corporate image, career opportunities, communication, psychological security, recognition and working with one’s line manager. These areas allow for a comprehensive assessment of the employee experience and provide a basis for planning targeted actions.

Area	Actions and initiatives implemented in 2025
Employee engagement	<ul style="list-style-type: none"> Conducted the annual employee engagement survey and, based on its results, implemented a Company-wide action plan. Developed and implemented the Employee Value Proposition program. Established the Company's behavioural values to strengthen organisational culture.

Area	Plans for 2026
Employee engagement	<ul style="list-style-type: none"> Conducting a <i>Top Employer</i> certification audit to have staff experience and HR management practices assessed by independent experts.

Work-life balance

Based on the results of the 2025 engagement survey, employees positively evaluated the hybrid work-leisure model, which allows them to work remotely for part of their working hours. This enables employees to flexibly balance professional and personal needs and contributes to a better work-life balance.

Since 2021, the Company has allowed employees to work remotely from abroad for a limited period. In 2025, 13 employees' requests to work **remotely from abroad** were approved (10 in 2024, 12 in 2023, 8 in 2022, 3 in 2021). Employees consider this opportunity convenient and believe it enhances their motivation and engagement.

To ensure work-life balance, **fixed working and rest hours** are continuously monitored and recorded in the timekeeping registers. Since early 2024, monthly reports accessible to each department manager have been prepared to enhance transparency. In 2025, this practice was fully implemented. Systematic monitoring has produced tangible results, with working time limits being exceeded far less frequently. This has led to an improved work-life balance and increased employee well-being.

In 2025, we substantially completed the updating of our working time and rest time documents in response to changing organisational needs and legislative changes, which we started in 2024. In 2025, the procedures for completing timesheets, On-call duty at home, and the Cumulative working time accounting system were reviewed, updated, and approved. The internal workplace regulations will also be updated in the near future. The updated documents are expected to further strengthen employees' work-life balance and contribute to fostering a positive work environment.

Remuneration

In 2025, the Company successfully fulfilled all its commitments to employees under the applicable **Remuneration policy**:

- Remuneration ranges were reviewed to ensure their competitiveness in the market.
- Monthly salaries were increased.
- Bonuses for outstanding achievements and innovation, as well as annual financial incentives, were paid.

The remuneration system in place at the Company ensures that pay is transparent, fair, and equally accessible to all, regardless of personal characteristics or social attributes.

Key principles of the remuneration system:

- Right to pay review and financial incentives – employees can be considered for salary increases based on their achieved results and contribution to organizational goals.
- Transparent remuneration ranges – established salary bands are publicly available to all employees through their line manager.
- Performance-based incentives – bonuses and additional incentives are awarded for outstanding achievements and innovative solutions.

These principles ensure that employees are properly recognized, motivated, and have clear prospects for career and financial growth within the Company.

Employee performance evaluation

The Company conducts an annual employee performance evaluation process. The purpose of this process is to create motivating incentives and conditions that encourage employees to achieve better performance results and actively contribute to the goals of the Company and the EPSO-G Group of Companies. The employee performance evaluation process consists of the following components: achievement of employee(s) objectives, quality of work, competencies, adherence to values, and calibration.

Employee performance is evaluated and individual objectives are set in accordance with the following principles:

- Principle of Alignment – the strategic objectives of EPSO-G are consistently cascaded through all management levels of the Company – from the Company’s CEO to first-level managers and employees – ensuring a strong connection with the Group’s strategic goals and their implementation.
- Principle of Smart Objectives – objectives are formulated to reflect continuous progress and value creation and must be specific, measurable, attainable, realistic, timely, evaluated, reviewed (S.M.A.R.T.E.R.).
- Principle of value-based goal achievement – objectives must be pursued in a way that ensures each action is guided by value-driven behaviours.
- Principle of mutual understanding of expectations – employees understand what results the Company expects from them, while the Company is aware of employees’ expectations in return. Mutual agreement is reached on the objectives employees commit to achieve, their responsibilities, and how the Company will respond to employees’ expectations.
- Principle of impartiality – all stages, criteria, and procedures of performance evaluation are applied consistently, transparently, and impartially to all employees.
- Principle of mutual respect – an open relationship based on mutual respect and trust between managers and employees is encouraged.
- Principle of responsibility – employees are responsible for achieving agreed-upon objectives in compliance with internal and external legal requirements, while managers are responsible for creating conditions that enable the achievement of these objectives.
- Principle of continuous mutual feedback – managers and their subordinates provide ongoing feedback to one another.

To ensure internal organizational fairness, all employees, regardless of their position or job specifics, are evaluated according to the same criteria. The process also strengthens transparency and consistency across different divisions. Responsible and honest feedback is promoted to support employee development. Annual employee performance calibration sessions are conducted to achieve these goals. During these sessions, the Company’s managers review the preliminary evaluation results of their subordinates. They analyse the distribution of these results and calibrate them across divisions.

Training and skills development

Amber Grid strategically invests in employee training and skills development to ensure the organization’s long-term resilience, business continuity, and readiness for the transformation of the energy sector. Strengthening employee competencies is considered one of the key measures for managing workforce-related risks and creating long-term value for the organization.

Area	Actions and initiatives implemented in 2025
Training and skills development	<ul style="list-style-type: none"> • We implemented the Level_UP II programme to strengthen engineering competencies. The program focused on welding, quality control, and technical standards competencies. It supports the safe operation of infrastructure and helps reduce technical risks. It supports the safe operation of infrastructure and helps reduce technical risks.
	<ul style="list-style-type: none"> • We reviewed and updated the succession programme, designed to identify and develop employees capable of taking on critical and managerial roles. The programme trains participants to assess business continuity risks, analyse talent readiness, and create individual development plans.
	<ul style="list-style-type: none"> • We developed a future competencies map, covering competencies for both existing and new infrastructure, and prepared a corresponding acquisition plan. Based on this map, we created individual employee development plans, which are regularly reviewed and updated. We also launched an internal training cycle, “Shaping Energy!” („Keičiam energiją!“), focused on energy transition and hydrogen (H₂) infrastructure topics.
	<ul style="list-style-type: none"> • Professional competency matrices were reviewed and updated to systematically manage departmental competencies and plan development activities. Additionally, manager clubs were organized, and a leadership competency development programme was implemented to enhance managerial skills.

Area	Actions and initiatives implemented in 2025
	<ul style="list-style-type: none"> • Training was provided to all employees on digital literacy, artificial intelligence applications, anti-corruption, emotional well-being, and performance efficiency. Targeted training programmes were delivered to specific employee groups based on professional needs. The e-learning system continued to be actively used as a flexible learning tool. <hr/> <ul style="list-style-type: none"> • We continued initiatives to share best practices, fostering knowledge exchange, collaboration, and continuous learning across the organization.

Area	Plans for 2026
Training and skills development	<ul style="list-style-type: none"> • Continuing ongoing training and development initiatives, including the mentorship programme, implementing programmes to strengthen general and leadership competencies, rolling out the “Energy of Customer Experience” programme for employees serving clients, and enhancing existing development activities. These measures are ensuring the continuity of employee competencies, supporting readiness for change, and strengthening the organization’s long-term resilience.

Monitoring the effectiveness of actions and initiatives

The Company consistently monitors and evaluates the effectiveness of its initiatives through various metrics and employee feedback.

We use the following methods to ensure a quality working environment and employee engagement:

1. Employee engagement surveys. Annual surveys monitor changes in the metrics and assess how the measures contribute to employee satisfaction and engagement.
2. Analysis of key performance indicators (KPIs). Monitoring changes in KPIs helps to assess the result of the actions implemented.
3. Evaluation of training outcomes. The number of participants and their feedback on the usefulness and applicability of the training in daily work are evaluated.
4. Analysis of reports on potential violations. Continuously recorded reports allow for evaluating the effectiveness of preventive measures and, when necessary, taking additional actions to ensure a safe, transparent, and respectful work environment.

Ensuring employee well-being involves an important role for the trade union. During regular meetings, employees’ needs, challenges, and expectations are discussed, and information related to planned and implemented initiatives is analysed.

Based on employee feedback and collected data, the Company continuously reviews and updates existing policy and strategy guidelines, such as the Equal opportunities policy and the Diversity and inclusion strategy. This ensures that decisions are aligned with real needs and contribute to creating a positive work environment.

The results indicate that the measures and initiatives in place are effective – employees value the opportunity to contribute to decision-making processes and share their observations.

Prevention of negative impacts

The Company applies consistent processes for preventing and managing adverse impacts related to employees. These processes are based on applicable laws, internal policies, and relevant international standards, aiming to identify risks in a timely manner and prevent potential violations. For more information, see the disclosure section of this report **S1-2 and S1-3**.

Resources allocated for action plan implementation

The Company ensures that sufficient human and financial resources are allocated for the implementation of workforce-related actions and initiatives. Resources are planned and distributed based on identified impacts, risks, opportunities, and the approved priorities of the S1 action plan.

A separate budget is allocated for measures related to employee well-being, skills development, and workplace safety. The allocation and use of these resources are periodically reviewed to ensure alignment with planned actions and organizational needs.

In addition to direct investments in employees, the Company invests in the development of internal information systems, including reporting channels, document management, and other internal systems. These systems help ensure smooth operation of employee-related processes and accessibility of information. They are also used to manage reports related to adverse impacts.

Planned resources are used to continue and expand measures related to employee well-being, skills development, and workplace safety, taking into account identified needs and the priorities of the action plan.

Actual resources 2025	Resources planned for 2026
<p>In 2025, the following financial resources were allocated for the implementation of workforce-related actions:</p> <ul style="list-style-type: none"> • Training – €262 thousand (2024 – €222 thousand); • Health insurance – €178 thousand (2024 – €165 thousand); • Occupational safety and health (OSH) – €154.2 thousand (2024 – €133.1 thousand). 	<p>In 2026, the Company plans to allocate the following financial resources:</p> <ul style="list-style-type: none"> • Training – €328.3 thousand; • Health insurance – €218 thousand; • Occupational Safety and Health (OSH) – €160.8 thousand.

S1-5 Targets related to managing material impacts

The Company’s key workforce-related targets and the methodology for their determination are presented in the “Strategy, Business Model, and Value Chain” section of this report. This section presents more detailed objectives that complement and expand the main goals described in the “Strategy, Business Model, and Value Chain” section.

The sustainability targets set by Amber Grid are closely linked to strategic goals promoting diversity, inclusion, and a strong organizational culture. Through these targets, we aim to create a unified and engaging work environment, develop employee competencies, and strengthen long-term employee engagement.

The 2025–2028 objectives are aligned with the Company’s sustainable development principles, taking into account the organization’s long-term aspirations.

Target	Progress	Status
Women in top management positions*	<p>≥ 21 % by 2027 ≥ 30 % by 2035</p> <p>In 2025, women accounted for 9% of top-level management positions (2024 – 9%). The indicator remains stable. Its increase occurs naturally through employee turnover, which during the reporting period has not been significant enough to drive faster change.</p>	Below target
Employee engagement rate**	<p>≥ 70%</p> <p>In 2025, employee engagement rate reached 75% (2024 – 69%).</p>	Above target
Successful recruitment for required positions	<p>100% by 2025</p> <p>2025: 100%; 2024: 100%.</p>	At target
Filling critical positions with internal candidates	<p>≥70% by 2025</p> <p>2025: 67%; 2024: 65%.</p>	Close to target, with a positive trend observed
All key roles included in the replacement plan have a ready successor.	<p>≥80%</p> <p>New metric, no data available for previous years</p>	New metric
Turnover of the succession pool for key roles	<p><10 proc.</p> <p>New metric, no data available for previous years</p>	New metric
Critical positions in the Replacement plan without a ready successor	<p><20 proc.</p> <p>New metric, no data available for previous years</p>	New metric
Career progression to managerial positions from the replacement pool	<p>≥50 proc.</p> <p>New metric, no data available for previous years</p>	New metric

* Top management positions include board members, CEO, and senior executives.

** Calculation is based on the Engaged Performance Survey©

Changes to the methodologies for targets and metrics

In the period 2024–2025, the Company reviewed and updated the methodologies for setting and measuring workforce-related objectives and indicators to ensure they are more precise, relevant, and better aligned with evolving national and international sustainability reporting requirements.

To better reflect the context of sustainability objectives and ensure their measurability, the following key changes were implemented:

- Gender diversity indicators were updated by setting gradual and clearly defined targets for increasing the share of women in managerial positions: 19% in 2026, 20% in 2027 and 21% in 2028;
- Employee engagement and diversity survey methodologies were reviewed by expanding questionnaires and strengthening result analysis to obtain more detailed and reliable feedback on employee experiences and expectations.

To improve data reliability and strengthen indicator monitoring, the methodologies were further enhanced by:

- Introducing a centralized digital data management system, enabling more consistent collection, processing, and analysis of employee-related data and ensuring the accuracy of indicator monitoring;
- applying a mixed assessment model combining both quantitative and qualitative indicators: quantitative indicators (e.g., percentage changes in gender representation) enable objective tracking of progress, while qualitative indicators (e.g., feedback from employee engagement surveys) provide deeper insights into employee experience, organizational culture, and areas for improvement.

The methodologies were reviewed taking into account the Company's strategic priorities, the results of the double materiality assessment, stakeholder engagement outcomes, and practical experience in applying the metrics. The purpose of these changes is to enable consistent and evidence-based monitoring of progress in areas identified as material for employees and the sustainability of the Company's operations.

S1-6 Characteristics of the Undertaking's Employees

This section provides information on the composition of the Company's employees by key demographic characteristics. The data present the distribution of employees by gender and cover a three-year period, enabling the monitoring of structural changes and trends in the Company's workforce.



Methodology. Employee headcount data are presented as of the end of the reporting year (31 December) and include all employees of the Company working under employment contracts, including those on maternity, paternity, parental leave, caregiving leave, or other types of leave provided by applicable legislation. All metrics are calculated based on data from the Company's HR registration systems, with the number of employees determined as of the end of the reporting year. This calculation methodology is applied consistently across all tables and metrics in this section.

Data on employees' gender are presented in accordance with categories defined by applicable legislation; information on other gender identities is neither collected nor disclosed.

Breakdown of employees by gender:

Gender	Number of employees		
	2025	2024	2023
Men	269	261	264
Women	99	91	87
Other**	Not applicable	Not applicable	Not applicable
N/A	0	0	0
Total	368	352	351

Compared to 2023, the total number of employees in the Company shows moderate growth in 2025, while the gender structure is gradually changing. In 2023, the Company employed 351 employees, of whom 264 were men and 87 were women. In 2025, the total number of employees increased to 368, including 269 men and 99 women. Over the two-year period, the number of male employees increased by 5, while the number of female employees grew by 12.

In 2025, the share of women in the total workforce increased compared to 2023. The proportion of men remained dominant, reflecting the nature of the Company's activities and the specifics of the sector.

Breakdown of the number of employees by gender and type of contract

2025					
Number of employees					
	Women	Men	Other	Not disclosed	Total
Number of employees	99	269	-	0	368
Number of permanent employees	92	262	-	0	354
Number of temporary employees	7	7	-	0	14
Number of non-guaranteed hours employees	Not applicable				

2024					
Number of employees					
	Women	Men	Other	Not disclosed	Total
Number of employees	91	261	-	0	352
Number of permanent employees	86	258	-	0	344
Number of temporary employees	5	3	-	0	8
Number of non-guaranteed hours employees	Not applicable				

2023					
Number of employees					
	Women	Men	Other	Not disclosed	Total
Number of employees	87	264	-	0	351
Number of permanent employees	82	263	-	0	345
Number of temporary employees	5	1	-	0	6
Number of non-guaranteed hours employees	Not applicable				

The Company's employment contracts are mainly permanent. When needed, employees are also hired under fixed-term contracts, for example, to cover staff on parental leave, to carry out project-based work, or to perform additional tasks. The type of employment contract is chosen based on the specific needs of the situation and mutual agreement, without discrimination based on gender, age, or other personal characteristics.

Compared to 2023, the number of employees in the Company increased from 351 to 368 in 2025, indicating organizational growth and a rising demand for staff.

The majority of employees continue to be permanent staff - 354 in 2025 compared to 345 in 2023 - confirming that the Company ensures stable employment relationships. This helps maintain competencies, ensure operational continuity, and manage staff turnover.

The number of temporary employees increased to 14 in 2025 (6 in 2023). This number increased because the Company implemented the Junior Engineers Program, during which employees were hired on a fixed-term basis. Temporary employment remains a small portion of the total workforce and is not the dominant form of employment.

During the 2023–2025 period, the Company had no employees working unrecorded hours. This ensures transparency in working time tracking and compliance with legal requirements.

Employee turnover



Methodology: The Employee Turnover Ratio is calculated by dividing the number of employees who left the Company voluntarily, were dismissed, retired, or passed away while in service by the total number of employees.

Employee turnover			
	2025	2024	2023
Employees who quit or were made redundant	44	53	36
Employee Turnover Ratio	0.13	0.15	0.1

During the 2023–2025 period, the Company experienced moderate fluctuations in the employee turnover ratio, which remained stable and did not exceed market and sector averages. In 2023, the employee turnover rate was 0.11. A temporary increase to 0.15 in 2024 is fixed. In 2025, the ratio drops to 0.13.

The increase in employee turnover in 2024 is due to natural turnover, including retirements, individual career choices and labour market dynamics. The decrease in the metric in 2025 indicates that the Company’s measures to enhance employee engagement, retention, and skills development contribute to organizational stability.

The Company uses the employee turnover ratio as an internal monitoring measure to assess the organization’s attractiveness, the competitiveness of working conditions, and the effectiveness of human resources management.

S1-7 Characteristics of non-employees in the undertaking’s own workforce

Non-employed personnel classified as part of the Company’s workforce



Definition of non-employees. Non-employees are defined as persons who have entered contracts with the Company for the provision of labour ("self-employed persons") or persons provided by companies mainly engaged in recruitment activities.

Number of non-employees		
2025	2024	2023
0	0	0

During 2023–2025, the Company had no non-employees.

S1-8 Collective bargaining coverage and social dialogue

In 2023, a collective agreement was approved, applicable to all Company employees, including members of the trade union. There are no agreements with employees regarding their representation in the European Works Council, the European Company (SE) Works Council, or the European Cooperative Society (SCE) Works Council.

Collective bargaining coverage and social dialogue

Coverage of collective agreements			Social dialogue
Part of the coverage	Employees EEA	Employees – non-EEA	Workplace representation (EEA only)
0–19%			
20–39%			
40–59%			
60–79%		Not applicable – The Company has no employees outside the EEA.	
80–100%			
80–100%	Lithuania (100%)		Lithuania (100%)

Note: EEA - European Economic Area.

S1-9 Diversity metrics

Gender distribution of employees at top management level

Gender distribution of employees at top management level								
	2025		2024		2023		2022	
	Number of employees	Employee share, %.						
Men	5	83%	5	83%	5	83%	5	83%
Women	1	17%	1	17%	1	17%	1	17%
Total	6	100%	6	100%	6	100%	6	100%

Note: The term "top management" refers to all senior-level managers and the Company's CEO.

During the 2023–2025 period, the composition of the Company's top management remained stable, with no changes in gender distribution. Throughout the analysed period, the top management team consisted of six individuals, of whom five were men (83%) and one was a woman (17%).

These figures reflect the structural gender imbalance in top-level management positions, which is characteristic of the energy sector and technically oriented organizations. At the same time, it is identified as a material area in the context of diversity and inclusion, which the Company takes into account when setting its long-term gender diversity objectives.

Gender distribution metrics in top-level management are continuously monitored, and the data are used to assess the organization's progress in gender diversity and to plan future changes.

Distribution of employees by age groups

	2025		2024		2023	
	Number of employees	Employee share, %.	Number of employees	Employee share, %.	Number of employees	Employee share, %.
Under 30 years old	35	9.51%	26	7.39%	28	7.98%
30–50 years old	212	57.61%	211	59.94%	205	58.4%
Over 50 years old	121	32.88%	115	32.67%	118	33.62%
Total	368	100%	352	100%	351	100%

During the 2023–2025 period, the age structure of the Company’s employees remained stable, with the majority of employees belonging to the 30–50 age group. In 2025, employees in this age group accounted for 57.61% of the total workforce. This group forms the core of the organization’s competencies and is essential for ensuring operational continuity.

Employees over 50 years old accounted for 32.88% of the total workforce in 2025, with their share remaining similar throughout the 2023–2025 period. This indicates that a significant portion of the Company’s workforce consists of employees with substantial accumulated knowledge and experience. At the same time, this ensures opportunities for replacement and knowledge transfer, particularly in critical technical positions.

Employees under 30 years old accounted for 9.51% in 2025, representing an increase compared to previous years. This trend indicates that the Company’s efforts to attract employees from this age group and increase their numbers are proving successful. To address the need for age diversity, the Company should increase the number of employees under 30 years old—this would create opportunities to acquire new competencies and achieve succession objectives.

The overall age structure of employees provides a foundation for succession planning, allowing the continuity of experience to be balanced with gradual workforce renewal and ensuring the continuity of critical functions over the medium and long term.

S1-10 Adequate Wages

In 2025, all Company employees received fair remuneration, not less than the nationally established minimum wage. Based on applicable legislation and market benchmarks, the reference amount for fair remuneration in 2025 in the Republic of Lithuania was the minimum gross monthly wage – €1,038 per month.

The Company’s remuneration system is based on the principles of the EPSO-G group and ensures that all employees receive competitive pay aligned with market conditions. In 2025, the Company’s wage level significantly exceeded the national minimum—according to publicly available data, the median remuneration was approximately €3,000 gross.

The Company’s remuneration levels are periodically reviewed through market benchmarking and with the support of external consultants. This approach ensures that the remuneration system remains fair, competitive, and supportive of employee attraction and retention.

S1-11 Social protection

All Company employees are provided with social protection, ensuring financial security in the event of significant life events—such as illness, workplace accidents, disability, termination of employment, parental leave, or retirement. Social protection is provided in accordance with the legislation of the Republic of Lithuania and supplemented by additional measures implemented by the Company.

The Company has a collective agreement in place, which provides additional social benefits for employees. Under this agreement, the Company provides additional retirement benefits to employees based on their continuous service with the Company, even in cases where such payments are not required by the Labour Code.

If the employment relationship is terminated by mutual agreement when the employee becomes entitled to full old-age pension, the following severance payments are provided:

- 10–19 years of service – a severance payment of at least 3 times the average monthly salary;
- 20–29 years of service – a severance payment of at least 4 times the average monthly salary;
- 30 or more years of service - at least 5 average salaries.

In addition, the Company provides financial support to employees in these circumstances:

- Upon the birth of an employee’s child;
- In the event of the death of the employee (support is provided to family members);
- In the event of the death of a relative of the employee;
- for employees with three or more children or a disabled child.

All employees are provided with additional health insurance after the end of their probationary period.

These measures contribute to employees’ financial security, well-being, and long-term trust in the Company, while also enhancing the organization’s attractiveness in the labour market.

S1-12 Persons with disabilities

Share of employees with disabilities

	2025	2024	2023
Share of employees with disabilities, %	0.27	0.57	0

Notes: The data is based only on information provided by employees, subject to restrictions on the collection of such information.

In 2023, no employees in the Company reported a disability. In 2024, employees with disabilities accounted for 0.57% of the total workforce, and in 2025, they accounted for 0.27%.

Fluctuations in the metric are related to the small absolute number of employees, so even individual changes are reflected significantly in percentage terms. The data are based on information voluntarily provided by employees, so the metric may not reflect the total number of employees with disabilities.

The Company monitors this metric as part of its diversity and inclusion efforts; however, percentage changes are not interpreted as a structural trend, given the nature of its operations and the specifics of data collection.

S1-13 Training and skills development metrics

Percentage of employees who participated in regular performance and career development reviews

Percentage of employees who participated in regular performance and career development reviews.			
	2025	2024	2023
Total number of employees	100%	100%	100%
Men	100%	100%	100%
Women	100%	100%	100%

100% of the Company's employees have annual and interim meetings with their direct supervisors, during which their performance, growth, and career opportunities are discussed. Employees who were on parental leave, whose probationary period had not ended during the reporting period, or whose employment ended during the goal-setting period did not participate in the performance review.

The annual performance review is conducted once a year; however, depending on the nature of the employee's role and responsibilities, it may be carried out at different intervals.

Average number of training hours per employee, by gender

Average number of hours of training per employee			
	2025	2024**	2023**
Total number of employees	68	71	79
Men	68	84	83
Women	66	34	67

Note: Calculations are based on the actual number of employees who participated in training. Participation in in-person training is recorded using signed attendance sheets; for remote training, participation reports generated by the Teams platform are used; and e-learning data are collected from the Moodle system. The duration of e-learning courses is determined based on the average time required to review and absorb the training material.

** Due to technical errors in the 2024 consolidated management report, adjusted calculations are provided.

The lower number of training hours for women is related to the nature of the work - more mandatory training is organised in engineering fields to obtain or renew professional certifications. Since these areas are male dominated within the organization (approximately 74% of all employees), this affects the overall distribution of training hours by gender.

Work-life balance metrics

Percentage of employees who took leave for family reasons, by gender

	Percentage of employees who took leave for family reasons		
	2025	2024	2023
Total number of employees	4.1%	4%	3.4%
Men	2,6%	1.5%	2,7%
Women	8,1%	11%	5,7%

Note: In accordance with the social policy, all Company employees are entitled to leave for family reasons.

In 2025, **4.1% of employees** took leave for family reasons. This figure remained similar to 2024 (4%) and was higher than in 2023 (3.4%). By gender, **8.1% of women** and **2.6% of men** used this type of leave in 2025. Although the share of women decreased compared to the previous year, it remained significantly higher than that of men, while the share of men increased compared to 2024.

This indicates that family-related responsibilities are still more often assumed by women, although men's involvement is gradually increasing. The Company ensures that all employees have access to these social guarantees, contributing to a better work-life balance.

S1-16 Remuneration metrics (pay gap and total remuneration)

Gender pay gap



Methodology. Formula used to calculate the gender pay gap: (Male employees' average hourly wage before taxes - female employees' average hourly wage before taxes) ÷ Male employees' average hourly wage before taxes × 100.

	Gender pay gap, %		
	2025	2024	2023
Total number of employees	-1	-4.27	-4.76

In 2025, the average hourly wage of women was approximately 1% higher than that of men, resulting in a gender pay gap of -1% (-4.27% in 2024 and -4.76% in 2023). The pay gap is influenced not by gender discrimination, but by the wage structure across job categories. In the 2023–2025 period, lower-paid positions within the worker categories were predominantly occupied by men, while the share of women in these roles was very small. Conversely, in higher-skilled and administrative positions, which are associated with higher hourly wages, the proportion of women is greater, which is reflected in the average hourly wage metrics.

Annual total remuneration ratio



Methodology. Annual total remuneration of the company's highest-paid individual ÷ Average annual total remuneration of all other employees (excluding the highest-paid individual).

Ratio of the annual total remuneration of the highest-paid individual to the average annual total remuneration of all other employees (excluding the highest-paid individual).		
2025	2024	2023
4.15	4.24	4.28

The total annual remuneration ratio remained stable over the 2023–2025 period and stood at 4.15 in 2025. Compared to previous years, the ratio slightly decreased, indicating a moderate pay gap between the highest-paid individual and the average remuneration of the remaining employees. This ratio aligns with the Company's remuneration policy and principles of proportionality.

S1-17 Incidents, complaints and severe human rights impacts

No discrimination claims were made, and no such cases were identified in the Company during the 2022–2025 period. No major human rights incidents related to the workforce occurred in the company during the reporting period.

Health and safety

Impacts, risks and opportunities

Sub-topic: Health and safety		
	Possible negative impact	Accidents on company premises can affect employee health and the company's reputation.
	Risks	Failure to comply with safety and health requirements (which may result in sanctions, increased insurance costs, and damage to the company's reputation).

S1-1 Health and safety policies

The main operational principles aimed at ensuring employee safety and health are established in the Occupational safety and health policy and the Partner Code of Ethics. Further information on the implementation of these policies is provided in the section “MDR-P Policies adopted to manage material sustainability matters”.

In the Occupational safety and health policy, we commit to ensuring safe and healthy working conditions, preventing workplace accidents and occupational diseases, implementing advanced technologies and work methods that reduce risk factors, and continuously strengthening the safety and health culture.

These principles are likewise applied in our collaboration with partners. In the Partner Code of Ethics, we require our partners to ensure safe and healthy working conditions for their employees, implement employee safety and health management

S1-2 Processes for engaging about impacts and S1-3 Processes and channels for remediation of negative impacts

Employees are systematically involved in discussions on work-related safety and health impacts, with opportunities to provide feedback, propose improvements, and participate in occupational risk assessments and decisions to enhance working conditions. Employee involvement is facilitated through formal consultation and participation mechanisms, ensuring that their feedback is taken into account when designing preventive measures.

We provide employees with accessible and trustworthy channels to report occupational safety and health risks, violations, or any other work-related concerns. All received reports are documented and examined, with corrective and preventive actions taken as needed to eliminate identified causes and prevent workplace incidents. Below are the main channels through which employees can raise and report issues related to occupational safety and health. It is the responsibility of the Company's CEO to involve employees in the management of potential negative impacts.

Processes and channels	Description
Occupational safety and health information system (DARSIS)	In 2024, the Company implemented a specialised Occupational safety and health information system DARSIS. It assesses occupational risks, provides coaching and encourages workers to record incidents, health and safety violations and unsafe working environments, as well as to report the need for additional protective measures. The system collects information on compulsory health checks, vaccinations offered by the employer, the results of occupational risk assessments and risk reduction measures. To ensure proper work authorization and that only adequately prepared employees work under hazardous or harmful conditions, the Company added a Work Authorization module to DARSIS at the end of 2025.
Employee representatives for health and safety	The Company appoints employee representatives for health and safety and maintains an active system of such representatives, ensuring that the interests of every employee are represented in this area. Elections were held in 2025, and currently this function is performed by 13 employee representatives, who are empowered to actively contribute to creating a safe and healthy work environment.

Processes and channels	Description
Employee safety and health committee	In 2025, a newly appointed Employee safety and health committee was established. To continuously improve safety processes, the committee works closely with employee health and safety representatives. All employees are encouraged to provide feedback, suggestions, or questions related to employee safety and health.

S1-4 Taking action on material impacts

Based on the identified significant impacts and risks in employee safety and health, in 2025 we implemented targeted measures focused on employees working under higher-risk conditions, particularly at infrastructure facilities and in outdoor environments. The following outlines the key measures implemented in 2025 addressing the identified adverse impacts and risks.

Management tools	
Occupational safety and health management system	Amber Grid has implemented an Occupational safety and health management system, certified in accordance with the ISO 45001 standard. It is integrated into all activities and applies to 100% of employees. The system is based on prevention, data-driven risk management, and continuous improvement, with employee engagement and management accountability considered essential elements of the safety culture. Safety requirements for employees and contractors are consistently enforced throughout the value chain, ensuring consistent standards and uninterrupted operations. In 2025, the management system was successfully recertified for a new 3-year certification cycle.
Assessment of occupational risks	The company has assessed the occupational risks for all employees, identified potential adverse health impacts, and established effective risk mitigation and management measures. Occupational risk is assessed individually for each employee and promptly reviewed whenever working conditions, technologies, workplace, job nature change, or new hazards are identified. When risks change, applicable preventive measures are updated, additional instructions or training are provided to employees, the scope of health checks is adjusted if necessary, and alternative personal protective equipment is selected. Occupational risks are assessed using the DARSIS Occupational safety and health information system, where each employee is assigned the necessary risk mitigation measures—such as health screenings, briefings, training, and personal protective equipment—based on the nature and level of the risk. This safety management system ensures that Amber Grid's employees are well prepared, informed and protected in challenging conditions.
Activities involving increased risk	Company employees working outdoors, in engineering structures (e.g., DSS, DKS), and in the protection zones of these facilities are exposed to a higher-risk work environment. Therefore, Amber Grid places special emphasis on their safety, preparedness, and professional development. To ensure the highest safety standards, employees regularly receive mandatory, specialised professional and technical training to keep their knowledge and skills up to date. Practical exercises are conducted, allowing employees to acquire skills that correspond to real-life situations. Managers are directly responsible for implementing these measures and ensuring employee preparedness, and they must collaborate with employee safety and health specialists. This ensures clear accountability and effective safety management when performing higher-risk tasks.
Risk assessment and management	Amber Grid has conducted a comprehensive analysis of potential hazards and risks related to external impacts on the natural gas transmission system and employees, as well as the effects of transmission system disruptions on third parties. In addition, an Emergency Management Plan has been developed to organize incident containment and mitigation activities, as well as a Security Plan outlining the Company's physical and cybersecurity measures and operational protection protocols. Personnel involved in these procedures are properly trained and instructed, and practical emergency and comprehensive drills are conducted annually to enhance employees' preparedness for responding to critical situations.
Supplementary health insurance	<p>In 2025, the Company continued to provide employees with voluntary health insurance benefits, offering an expanded and more favorable health insurance service package. Health insurance remains one of the key measures for employee motivation and well-being. The company continuously monitors the health services market and strives to ensure that employees have access to the best healthcare options, contributing to their long-term well-being and job satisfaction.</p> <p>This measure helps reduce work-related health risks, contributes to the early prevention and timely treatment of health issues, and creates conditions to maintain employees' long-term ability to work and enhance productivity.</p>
Assessment of psychosocial risk factors	The company carries out a psychosocial risk assessment every two years, allowing for a systematic evaluation of how the work environment affects employees' emotional health

Management tools	
	<p>and well-being. The latest assessment took place in 2024, involving 208 employees, which accounted for 61.3% of the company’s workforce.</p> <p>In comparison with the 2022 assessment, the results indicated positive developments: improved colleague relationships, increased job satisfaction, and higher evaluations of work flexibility. The outcomes of the assessment are utilized to design targeted initiatives, enhance managerial and team involvement, and support the prevention of psychosocial risks. This practice will continue in 2026 to consistently monitor employee well-being and target improvements in the working environment.</p>
Actions carried out in 2025	
Safety and health culture maturity survey	<p>In October 2025, the Company carried out a survey of 179 employees to assess the maturity of the safety and health culture. The results of the survey showed that employees have a positive attitude towards:</p> <ul style="list-style-type: none"> • organization of occupational safety and health within the company; • dissemination of information regarding safety issues; • managerial involvement. <p>The outcomes of the survey were communicated to all employees to provide transparent feedback and foster a common understanding of the safety culture’s strengths and development opportunities. Drawing on the survey findings, the company prepared a 2026 plan to enhance the Employee safety and health culture. It will be implemented in a targeted way across the Company to achieve a more mature safety culture.</p>

Resources for implementing the action plan

The budget for the implementation of management measures in the field of occupational safety and health in 2025 is €154.2 thousand (€133.1 thousand in 2024). EUR 160.8 thousand is foreseen for 2026.

These financial resources are allocated to occupational safety and health preventive measures, training, risk assessment, and control. They directly contribute to the achievement of the goal—zero serious or fatal workplace accidents.

The financial resources allocated to this goal are being steadily increased and directed toward employee safety and health preventive measures, training, risk assessment, and control. By increasing the budget, we can target prevention and introduce more effective safety solutions that reduce the risk of accidents. This ensures the long-term improvement of employee safety levels and the sustainable development of a safe work environment.

S1-5 Targets related to managing material impacts

Our long-term strategy sets the course for fostering a safe and positive work environment and enhancing the safety culture. We consider serious and fatal accidents to be material negative impacts, and therefore we aim to eliminate them entirely in the activities of both our employees and contractors. The table below presents the established employee safety and health target, its intended value, and the progress achieved.

Target	2025	Status
The number of serious or fatal accidents to our employees or contractors.	0	Target in progress

S1-14 Health and safety metrics

Health and safety metrics

	2025	2024	2023
Number of work-related fatalities and occupational health cases.	0	0	0
Number of recordable work-related accidents	0	1	1
The total number of hours worked by all employees	609,336	587,068	590,247
Rate of recordable work-related accidents	0	1.70	1.69
Number of cases of recordable work-related ill health.	0	0	0
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health.	0	7	6
Number of fatalities due to work-related injuries and work-related ill-health among non-employees working at the Company's sites	0	0	0

Note: The company's occupational health and safety management system is applied to all employees.

The data for 2023-2025 show a consistently high level of occupational safety in the Company and positive trends in recent years. No deaths from work-related injuries or occupational health disorders were recorded during the reporting period. This confirms that the Company's prevention system is effective. The number of recorded work-related accidents between 2023 and 2025 is very low, with only a few isolated incidents. The accident rate remains very low. There were no occupational accidents recorded in 2025. No work-related health problems were recorded during this period. The number of lost workdays decreased between 2023 and 2024, with 2025 data showing further improvement. This allows the conclusion that the implemented occupational health and safety measures are consistent and effective. Safety requirements apply not only to employees but also to non-employees working at the Company's sites. The Company is committed to maintaining a safe working environment and to continuously improving its safety performance.

Privacy

Impacts, risks and opportunities

Sub-topic: Privacy		
	Possible negative impact	Inappropriate handling of personal data or cybersecurity breaches can affect employees' rights.
	Risk	Financial risk of personal data breaches (which may result in substantial fines and claims from data subjects for compensation).

S1-1 Policies related to employee privacy

The key operating principles aimed at ensuring employee privacy and data protection are set out in the Personal data protection policy. Further information on the implementation of this policy is provided in the section “MDR-P Policies adopted to manage material sustainability matters”.

In our personal data protection policy, we commit to processing employee data in accordance with the principles of lawfulness, transparency, data minimisation, and security, and to implementing organisational and technical measures to ensure data confidentiality and protection in line with the requirements of the EU General Data Protection Regulation. We also ensure that data are processed solely for clearly defined purposes, retained for a limited period, and that each data subject is able to exercise their rights

S1-2 Processes for engaging about impacts and S1-3 Processes and channels for remediation of negative impacts

Area	Ways of management
Privacy	Employees are regularly informed about privacy and personal data protection requirements, and consultations are provided as needed. The Company prepares guidance materials and presentations on key personal data protection topics and promotes employee engagement and awareness in this area. These processes help to ensure prevention and timely identification of potential privacy risks in our daily activities.

S1-4 Taking action on material topics

To manage privacy-related risks and ensure compliance with personal data protection requirements, we implemented the actions described in the table below, thereby strengthening privacy risk management and personal data protection.

Area	Actions carried out in 2025
Data protection	<ul style="list-style-type: none"> Mandatory e-learning on personal data protection was developed and implemented for employees. Personal data protection compliance audits were conducted, which identified no significant non-compliances; however, areas for improvement were identified and corresponding actions were planned.

S1-5 Targets related to managing material impacts

The company complies with the accountability principle established in the EU General data protection regulation and consistently strengthens personal data protection management. Group companies maintain records of personal data processing activities, prepare privacy notices, carry out other mandatory actions, and ensure that these are properly documented.

We manage personal data protection risks by implementing technical and organizational measures and conducting compliance audits, which assess the effectiveness of those measures. To ensure a consistent approach, personal data protection processes are being further standardized across the Group.

In 2024–2025, no significant personal data security breaches were identified in the Company.

Target	Status
Human rights violations (including moderate/high impact personal data breaches)	0 Target in progress

S3 Affected communities

The Company’s construction and infrastructure maintenance activities may impact local communities, and the reliable operation of its systems is important for public safety and service continuity. The Company considers this topic material and applies measures to manage community impact and safety-related risks. Based on the results of the Double Materiality Assessment, the topic related to land and safety was identified as material due to its potential impact on communities, infrastructure reliability, cybersecurity, and operational risks. An overview of actual negative impacts and related risks is provided below.

Impacts, risks and opportunities

Sub-topic: Land and security related impacts		
	Possible negative impact	Direct activities (construction, maintenance) may impact communities (noise, vibration, dust, traffic restrictions, etc.),
	Risks	Management and mitigation of negative impacts on communities (may require compensation for damages or technological investments).
	Risks	Cyber-attacks, infrastructure failures and disasters can negatively affect communities if services are disrupted, security incidents occur, or provision becomes unreliable.

S3-1 Policies related to affected communities

Based on the Double Materiality Assessment, it was determined that the Company’s activities have a material actual negative impact on local communities in terms of land use and safety, related to infrastructure construction, reconstruction, operation, and maintenance works. This impact manifests as temporary physical inconveniences, such as noise, vibration, dust, traffic restrictions, or temporary limitations on land use.

The key operational principles aimed at reducing community impact are established in the Environmental Protection, Sustainability, Support and Humanitarian Aid Policies, as well as in the Partners’ Code of Ethics. Further information on the implementation of these policies is provided in the section “MDR-P Policies adopted to manage material sustainability matters”.

In our Environmental Protection Policy, we commit to reducing the impact of our activities on communities, providing opportunities for their engagement in project planning at early stages, collaborating on environmental issues, and ensuring transparent communication on progress in environmental protection.

The **Sustainability policy** sets out that in planning and implementing sustainable development actions, we seek the full involvement of stakeholders, and promote transparent and fair cooperation and dialogue with communities.

In our Support and Humanitarian Aid Policy, we commit to collaborating with communities in whose environment we carry out activities or implement projects and programs. We place particular emphasis on initiatives that contribute to improving the well-being of those communities. The requirements for providing support are defined in the Support And Humanitarian Aid Provision Rules.

Commitments to protecting **human rights** in communities are integrated into the Group’s Code of Ethics. It establishes commitments to respect human rights and freedoms, comply with the Universal Declaration of Human Rights and International Labour Organization conventions, and fully prohibit discrimination, violence, and harassment. Although no systemic human rights violations in communities have been identified as a result of the Company’s activities, potential local or temporary negative impacts are identified, assessed, and managed through preventive and mitigation measures.

The impact on local communities is managed at the project level, taking into account specific territorial, technical, and social conditions, and in compliance with the policy principles applied across the Group. Amber Grid aims to ensure that, when planning and implementing projects, solutions that reduce impacts on the environment and communities are applied systematically:

- **Waste management.** Contractors working on construction projects are obliged to manage waste properly by collecting, sorting and handing it over to licensed waste handlers. The movement of waste is recorded and controlled, and chemical substances are handled to prevent their release into soil or groundwater.
- **Managing noise and physical impacts.** During works, the impact of noise and vibration on local communities is assessed; noisy operations are carried out only during designated periods, with residents and stakeholders informed in advance.

- Environmental impact assessment.** Before starting projects, environmental impact assessments are conducted. These assessments identify potential negative factors and plan mitigation measures, including the management of working hours, traffic flows, and equipment use.

Environmental and community-related actions are planned in advance to minimize negative impacts and ensure the quality of life in the areas where the Company operates. The Company continuously monitors the impact of its activities on local communities and takes corrective actions when necessary. During the 2022–2025 period, the Company received no reports of human rights violations in communities related to its activities. This indicates that the applied impact management and prevention measures were effective.

S3-2 Processes for engaging with affected communities about impacts

To timely identify, discuss, and manage impacts related to the Company’s activities and to minimize potential negative effects on community quality of life and the environment, Amber Grid applies consistent local community engagement processes. Community engagement is considered an essential part of project planning and implementation.

Engagement processes and channels	Description
Trust line	We have implemented whistleblowing channels through which communities can report concerns (e.g., acts of corruption, non-compliance, environmental violations, etc.). We ensure the confidentiality and safety of whistleblowers, record and investigate all received reports, provide responses to the submitters, and protect whistleblowers from adverse consequences. For more details, see section "G1-1 Corporate culture and business conduct policies".
Meetings with communities	We organize meetings with communities and local government representatives to present planned energy projects, potential negative impacts, and the measures in place to manage them. We provide opportunities for communities to engage at early stages of project implementation, raise questions, and submit comments and suggestions for mitigating negative impacts, while providing responses to their relevant questions during the meetings. Meetings are scheduled at times convenient for the communities.
Informing through local or national media	Depending on the number of affected individuals or households and the scale of the impact, we inform about planned projects and activities via local and/or national media outlets as well as community social media groups, ensuring accessibility and dissemination of information.
Direct contact with project managers	We provide community representatives with the opportunity to communicate directly with project managers via email or phone during the implementation of energy projects, report issues, and express concerns about ongoing works and their potential impacts. Such direct dialogue allows for the prompt resolution of issues important to the communities.

These engagement processes help ensure that local communities are not only informed but also genuinely involved in decisions related to the Company’s impact on their environment. This strengthens trust and social dialogue. If community members identify negative impacts during project implementation or believe that their feedback has not been properly considered, they have the opportunity to use formal channels for remedying negative impacts and submitting complaints, as described in section S3-3.

The Company’s CEO is responsible for ensuring that representatives of affected communities and other stakeholders are engaged in the management of actual negative impacts and in decision-making. We do not separately assess the effectiveness of community engagement.

S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns

This section describes the processes and channels applied in cases where negative impacts identified during community engagement cannot be fully avoided or where potential negative impacts are identified during project implementation.

The Company and the EPSO-G Group have implemented formal, secure, and confidential channels through which affected communities can provide information on potential negative impacts, express concerns, or report possible violations. These channels form an integral part of the Company's impact management system and complement the community engagement processes.

Community members can report issues related to:

- Potential environmental violations,
- Safety incidents or risks,
- Inappropriate conduct during project implementation,
- Other factors that may have a negative impact on communities or their quality of life.

Reports can be submitted anonymously or with the reporter's identity disclosed, depending on the chosen channel.

All received reports are reviewed in accordance with mechanisms established at the Group level, ensuring:

- Confidentiality,
- impartial and responsible handling,
- protection of whistleblowers from any potential adverse consequences.

Channels for delivering the message:

- **Amber Grid Trust line:** sauga@ambergrid.lt
- **EPSO-G Trust line:** pranesk@epsog.lt
- **Online:** <https://pranesk.epsog.lt>
- **Phone:** +370 612 70606
- **Mail:** Amber Grid, Laisvės pr. 10, Vilnius.
- **Other methods:** are disclosed in this report in accordance with the disclosure requirement **G1-1**.

The information received, depending on its nature, is used to plan corrective or preventive actions to remediate identified negative impacts or to prevent their recurrence in the future.

S3-4 Taking action on material topics

Community impact management is integrated into the Company's project planning, implementation, and monitoring processes and is applied on a practical, project-based principle.

Actions aimed at identifying, mitigating, and managing negative impacts on affected communities are implemented during each project, taking into account the specific location, nature of the works, and potential impacts.

Key measures applied:

- Identification of potential impacts on communities during the project planning stage (noise, vibration, dust, traffic restrictions, safety);
- Informing and engaging communities before and during the execution of works (see S3-2);
- Applying technical and organizational measures to mitigate negative impacts on the environment and local communities;
- Monitoring contractor activities to ensure compliance with environmental, safety, and waste management requirements;
- Responding to community comments, complaints, or reports through established channels for remedying negative impacts (see S3-3).

These measures are applied consistently in practice and reviewed during each project to ensure that the Company's activities do not cause undue negative impacts on local communities and their safety.

The actions implemented by the Company to manage and mitigate negative impacts have been integrated into regular operational processes and are funded from the overall operating budget. Implementation of these actions does not require any significant investment or operational expenses and does not involve external funding. We use internal human and organisational resources to implement our actions. The specific amounts of allocated financial resources are not separately identified or disclosed.

S3-5 Targets related to managing material impacts

Currently, at the Group level, we have not established quantitative targets for managing community-related impacts. The Company manages community-related issues through applicable policies, actions, and ongoing monitoring, taking into account the scale, nature, and potential impacts of the energy projects being implemented.

The Company consistently assesses the impact of its activities on local communities and, upon identifying potential material negative impacts, risks, or changes, takes appropriate measures to protect community interests and ensure sustainable operational development.

Key targets related to affected communities include:

- Ensuring that infrastructure construction, maintenance, and development works do not cause undue negative impacts on the safety, health, or quality of life of local communities;
- Timely identification and management of land-related impacts (noise, dust, traffic restrictions, temporary inconveniences) through preventive and mitigation measures;
- Ensuring transparent communication with local communities and providing opportunities for them to express feedback or concerns during project planning and implementation;
- Preventing incidents that could threaten human safety or infrastructure reliability.

These targets are applied continuously and evaluated throughout the entire project lifecycle—from planning, through implementation, to project completion. The Company periodically reviews the impact management measures in place and, where necessary, adjusts them based on actual impacts, community feedback, and the operational risk profile.

A continuous priority for the Company is to ensure that communities living near gas infrastructure are not exposed to health or safety risks and that no accidents occur due to the actions of the Company or its partners.

Target		Status
Zero accidents affecting people living near gas infrastructure as a result of the Company’s activities	0	Target in progress

S4 Consumers and end-users

Reliable information on system performance and uninterrupted energy service delivery are essential factors influencing consumer trust in the energy system. Considering the potential impact of information gaps or service disruptions on end users, the Company regards these topics as material and integrates information disclosure and service continuity aspects into its operational management. Based on the results of the Double Materiality Assessment, the topics of access to information and access to products and services were identified as material due to their potential impact on consumers, as well as related legal, financial, and reputational risks. An overview of potential negative impacts and associated risks in these areas is provided below.

Impacts, risks and opportunities

Sub-topic: Access to (quality) information		
	Potential negative impact	Untimely, insufficient, or difficult-to-access information about service delivery and system performance may negatively affect consumers and end users, reducing trust in the energy system.
	Risk	Insufficient disclosure of information to the public or stakeholders may lead to lawsuits, fines, and damage to the Company’s reputation.
Sub-topic: Access to products and services		

	Possible negative impact	Infrastructure disruptions, limited system expansion in peripheral areas or market volatility can affect end-users' access to energy services.
	Risk	Disruptions in energy transmission may result in significant infrastructure restoration costs, require compensation mechanisms, and lead to potential legal consequences.

S4-1 Policies related to consumers and end-users

The key operating principles for managing impacts and risks to consumers and end-users are enshrined in our policy documents. For more information, see "MDR-P Policies adopted to manage material sustainability matters".

The Code of Ethics sets out the key principles and standards of conduct that guide our operations and the way we maintain relationships with stakeholders. We apply principles that ensure the protection of end users' rights and interests: respecting human rights, maintaining transparency, providing information responsibly, avoiding discrimination, and safeguarding personal data.

To standardize interactions with market participants across the Group and follow best practices, we plan to develop common customer service guidelines in the future. Additionally, recognizing the importance of managing consumer and end-user issues and the potential negative impacts in this area, we will seek to review the management and policies related to this topic in the future.

S4-2 Processes for engaging with consumers and end-users about impacts

We operate on a Business-to-Business (B2B) basis, so the interests and expectations of end energy users are incorporated into the decision-making process through direct market participants – gas producers, large energy consumers, and other entities in the energy sector. Based on the insights, needs, and feedback of these stakeholders, we assess the potential impact of our activities on end users and identify areas for improvement.

Annually, at the Group level, we conduct surveys of market participants (customers) to evaluate service quality, the effectiveness of collaboration and communication, and other aspects related to service provision. Survey results are used to improve operational and management processes and enhance engagement with market participants, thereby indirectly reducing potential negative impacts on end users.

We engage stakeholders following established governance principles. We apply various engagement methods, including consultations, dialogue, meetings, surveys, and feedback collection. These processes help ensure that the views of market participants—and, through them, end users—are heard and considered in decision-making.

The Company's CEO is responsible for ensuring that consumers and end users are engaged in the management of potential negative impacts and in decision-making.

S3-3 Processes and channels to remediate negative impacts

Amber Grid and EPSO-G have established **Trust Lines**. These channels are intended to allow consumers, end users, and other stakeholders to safely and, if desired, anonymously report potential violations or raise concerns. They are used to report possible cases of corruption, environmental violations, non-compliance, or other issues that could have a negative impact on consumers, end users, or the public.

All reports are handled in accordance with the **principles of confidentiality, impartiality and whistleblower protection**, and the information provided is assessed in accordance with the Group's internal procedures. Where necessary, corrective or preventive actions are taken to remedy identified violations and mitigate potential negative impacts.

Whistleblowing channel:

- Amber Grid Trust line: sauga@ambergrid.lt
- EPSO-G Group Trust line: pranesk@epsog.lt
- **Online:** <https://pranesk.epsog.lt>
- **By phone:** +370 612 70606
- **By mail:** "Amber Grid, Laisvės pr. 10, Vilnius.
- **Other methods** are disclosed in this report in accordance with the disclosure requirement **G1-1**.

Other communication channels

We ensure that consumers and end users have accessible, transparent, and effective channels to submit complaints, claims, report potential negative impacts, or provide feedback on our activities. These channels enable timely identification of issues, assessment of their causes, and, when necessary, the implementation of corrective measures. Below, we present the main channels through which stakeholders can get in touch.

Processes and channels	Description
Email	We provide stakeholders with the opportunity to submit inquiries, complaints, or feedback via a general email address. We have also provided specialized contacts for specific issues (e.g., infrastructure, data protection, incidents, or land use).
Telephone contact	We provide customer and stakeholder support through telephone lines, enabling prompt reporting of issues or access to the necessary information.
Written and oral appeals	We accept formal complaints, claims and requests in writing or orally, in person at the Company's office.
Direct contacts	On our website, we publish the contacts of responsible departments and employees so that stakeholders can directly address specific technical, regional, or operational impact issues.

S4-4 Taking action on material topics

Area	Management methods
Access to products and services	<p>Amber Grid operates on a business-to-business (B2B) model and does not supply products or services directly to end-users. The Company's services reach end users indirectly—through energy transmission, exchange, and other market operators.</p> <p>Within this operating model, the Company manages its impact on end-users by operating the infrastructure in a reliable, safe and uninterrupted manner, in compliance with legislation, technical standards and regulatory requirements. This contributes to the stable functioning of the energy supply chain and protects the interests of end-users.</p> <p>Detailed information on the EPSO-G Group's strategic objectives, operational metrics, and management principles related to service accessibility and energy security is provided in the "Operational Strategy and Implementation Progress" section of the EPSO-G 2025 Management Report.</p>
Access to (quality) information	<p>The Company recognizes that the accessibility and quality of information are material factors affecting both direct and end users. Although the Company does not interact directly with energy end users, it ensures that reliable and timely information is provided to the public and stakeholders in accordance with applicable legislation and internal procedures.</p> <p>Information is disclosed and communicated in line with principles of transparency, accuracy, and accountability. All stakeholders can submit inquiries or reports through both anonymous and non-anonymous channels. In this report, the procedures for submitting and handling reports are disclosed in accordance with the G1-1 disclosure requirement.</p>

S4-5 Targets related to managing material impacts

At the Group level, we have not currently set specific targets related to managing material negative impacts on consumers and end users. Recognizing the importance of this topic and based on the results of a gap analysis, we plan to review the management practices and policies in this area in the future and establish corresponding targets.

The Company consistently monitors the impact of its activities on consumers and end users through systematic risk management, incident analysis, and stakeholder feedback.

Amber Grid’s targets related to uninterrupted service delivery and customer satisfaction are presented in the table below.

Target	Progress	Status
≥ 80 points Global Customer Satisfaction Index (GCSI) – among the world's leading companies	86 Excellent results were achieved in 2023–2025, exceeding the set target.	Target in progress
Zero unplanned gas transmission disruptions; Continuous gas transmission was maintained, and rapid fault resolution was ensured	0 No unplanned disruptions occurred in 2023–2025.	Target in progress

6.4. Governance area

G1 Business ethics

Based on the results of the Double Materiality Assessment, Business Ethics has been identified as a material topic for the company from a governance (G) perspective. The assessment determined that areas related to corporate culture, whistleblower protection, supplier relationship management (including payment practices), and the prevention of corruption and bribery may have a significant adverse impact on the company’s transparency, reliability, and stakeholder trust, as well as lead to reputational, legal, and financial risks.

The information below outlines the key identified impacts and risks, structured according to the material subtopics defined in the Double Materiality Assessment.

Impacts, risks and opportunities

Sub-topic: Corporate culture		
	Potential negative impact	Insufficient application of the principles of transparency, accountability, ethics, and inclusion may negatively affect employee trust, organizational culture, and relationships with stakeholders.
	Risk	Failure to implement sustainability policies, internal ethical standards, and legal requirements may damage the Company’s reputation and reduce its access to financing and long-term value.
Sub-topic: Protection of whistleblowers		
	Potential negative impact	Ineffective reporting and whistleblower protection mechanisms may lead to breaches of confidentiality and adverse consequences for whistleblowers. This may undermine the confidence of employees and other stakeholders in the Company.
	Risk	Failure to implement whistleblower protection requirements can damage a company's reputation, reduce the use of whistleblowing systems and make them less effective.

Subtopic Supplier relationship management, including payment practices		
	Potential negative impact	<p>Supplier non-compliance or insufficient application of responsible sourcing principles may negatively affect project implementation, service continuity, and the Company's operational efficiency.</p> <hr/> <p>Selecting unreliable suppliers or conducting procurement inefficiently may lead to additional costs, project delays, or disruptions in the supply chain.</p>
Subtopic Corruption and bribery		
	Potential negative impact	Corruption or other unethical conduct may violate the rights of employees, partners, and other stakeholders and undermine trust in the Company.
	Risk	Corruption and bribery can disrupt the Company's operations, lead to legal consequences, financial losses and damage the Company's reputation.

The actions implemented by the Group to manage and mitigate negative impacts are integrated into our normal business processes and are financed from our overall operating budget. The implementation of these actions does not require material additional capital or operating expenditure and is not linked to external financing. The implementation of these actions relies on internal human and organizational resources. The specific amounts of financial resources allocated are not separately identified or disclosed.

G1-1 Corporate culture and business conduct policies

The Company actively promotes business ethics and fosters a responsible organizational culture, based on Group-level policy documents disclosed in the section "MDR-P Policies adopted to manage material sustainability matters".

Our governance is based on the Group's values and Code of Conduct, which sets out basic standards and principles of conduct. We consistently emphasize the importance of these principles to employees through training, internal meetings, and daily operations, with the aim of fostering an ethical, transparent, and responsible organizational culture.

Shaping the Company's culture

The Company actively fosters its organizational culture with the aim of creating an inclusive work environment that promotes respect and trust. The culture is developed in a targeted manner through various initiatives and measures that strengthen employee engagement, a sense of community, and shared responsibility for common goals.

Organizational culture is promoted through the following measures:

- **Targeted actions to promote culture.** The Company organizes topical initiatives, such as Equal Opportunities Month, highlighting respect for diversity, inclusion, and equal opportunities. These initiatives enhance employee awareness and contribute to a harmonious and inclusive workplace.
- **Training and education.** The Company conducts training and communication campaigns on anti-corruption, ethics, and compliance. Employees are familiarized with the Group's Code of Conduct and take part in practical workshops designed to reinforce the importance of responsible and ethical behaviour.
- **Activities for the benefit of society.** Events promoting a sense of community and social responsibility are organized, such as volunteering initiatives and tree-planting campaigns. These efforts enhance team cohesion and contribute to positive developments within local communities.

Fostering organizational culture starts at the highest level of management. In line with the Group's Code of Conduct, managers are expected to demonstrate personal leadership, uphold ethical standards of conduct, and embed these principles within their teams. Leadership plays a key role in creating a transparent, fair, and respectful work environment. The Company has defined core values that provide a common foundation for all organizational activities.

Our governance is grounded in the ethical principles set out in the Group's Code of Conduct, which consistently guide our day-to-day operations and decision-making:

- Respect for human rights;
- Sharing of information and experience;
- Ensuring diversity, inclusion, and equal opportunities;
- Care for employee health, safety, and well-being;
- Commitment to climate action, environmental protection, and societal well-being;
- Cooperation with communities, supervisory authorities, and organizations;
- Compliance with legal requirements;
- Avoidance of conflicts of interest;
- Protection of personal data and information;
- Zero tolerance for corruption;
- Adherence to a zero-gift rule;

The Company fosters an environment resilient to corruption, where every employee plays an important role. Therefore, all employees—regardless of their position or functions—are trained in anti-corruption conduct principles.

In 2024, Amber Grid was awarded the International Standard ISO 37001:2016 Anti-bribery management systems – Requirements with guidance for use certificate confirming that Amber Grid actively promotes business ethics and fosters a responsible organisational culture.

Whistleblowing channel

A Trust Line is in place at Amber Grid and throughout the Group, providing employees and other stakeholders with a secure and anonymous channel to report potential violations. Reports may relate to various areas, such as corruption-related activities, compliance breaches, non-compliance with environmental requirements, or other irregularities.

Employees of the Company and other stakeholders may, without fear of adverse consequences, report suspected violations, unethical or dishonest conduct either directly or anonymously to the designated responsible person or other employees of the Prevention Unit through the following channels:

Whistleblowing channels:

- **Amber Grid Trust line:** sauga@ambergid.lt
- **EPSO-G Trust line:** pranesk@epsog.lt
- **Online:** Safety Line
- **By phone:** +37061270606
- **By mail:** Amber Grid's registered office at Laisvės pr. 10, Vilnius

No reports related to corruption were received in 2024–2025.

The operating principles of the Trust Line and information on the protection of reporting persons are described in detail in the Group's **Anticorruption Policy**.

These channels enable employees and other stakeholders to report potential violations, unethical, or dishonest conduct in a safe and confidential manner. The Company ensures that every report is duly examined in accordance with the highest standards of transparency and confidentiality.

Information on reporting channels and available methods is published on the websites of the Group companies and in the internal intranet section accessible to employees. The procedure for handling reports is regulated by clearly defined internal policies, ensuring that all received reports are assessed objectively, professionally, and confidentially, and that appropriate actions are taken.

Protection of whistleblowers

In accordance with national legislation and internal regulations, the Company ensures that whistleblowers who provide information through the Trust Line are protected from any potential adverse consequences. The confidentiality of whistleblowers is guaranteed at all stages. Where requested, full anonymity is granted. These safeguards apply in all cases, regardless of whether the reported information is substantiated.

In line with national legal requirements and the Company's internal procedures, whistleblowers are provided with a broad range of protection guarantees. These safeguards apply not only to the whistleblower, but also to his/her family members, protecting them from any potential negative impact resulting from the disclosure. Retaliation in any form is prohibited, including, but not limited to, the following actions:

- Temporary suspension from duties or unlawful dismissal;
- Restriction of career development, such as denial of promotion opportunities or suspension of a planned promotion;
- Reassignment, where the whistleblower is transferred to a lower role or a different workplace without objective reasons;
- Unjustified modification of contract terms, e. g., failure to offer a permanent employment contract to an employee who has a legitimate expectation of receiving one.

Business ethics and anti-corruption

All employees are familiarized with the Group's Code of Conduct, the primary internal regulation governing business ethics, which establishes standards for fair, transparent, and responsible conduct.

To ensure adherence to these principles, training sessions are conducted covering business ethics and anti-corruption topics. In addition, various events are organized to present the Company's values, principles of conduct, and other key cultural aspects.

Positions at risk of corruption

In accordance with national legislation and the Company's internal regulations, positions with the highest exposure to corruption risk have been identified and included in a dedicated list of screened roles. To ensure transparency and public awareness, the list of screened positions is publicly available on the Company's website. This enables both employees and stakeholders to understand which areas of activity receive particular attention in terms of corruption prevention.

G1-2 Management of relationships with suppliers

The Company considers the procurement function to be one of the strategic areas of its operations, contributing to sustainable growth and effective risk management across the Group. Procurement activities are based on long-term planning, digitalisation, strengthening of operational resilience, and the application of sustainability principles.

To ensure transparency and responsible supply chain management, suppliers are required, prior to signing contracts, to familiarise themselves with the Partner Code of Conduct and confirm their commitment to complying with the principles set out therein. They are also required to complete a dedicated questionnaire designed to identify supplier behaviour patterns and potential risks. All suppliers must meet the established requirements and must not have committed environmental or social violations that would result in their exclusion from procurement procedures.

The primary focus is on procurement quality and process compliance; therefore, the most significant procurements are carried out by employees holding official procurement specialist certifications. This practice helps manage risks related to the procurement process and ensures a high level of competence.

Contract enforcement

The procurement process incorporates a contract performance and control mechanism that enables monitoring of supplier activities, evaluation of their capacity to meet contractual obligations, and timely detection of potential issues. Particular attention is given to working with more vulnerable supplier groups in order to ensure fair competition and long-term cooperation.

In our contracts with partners, we stipulate that:

- Partners, in fulfilling their obligations, comply with the requirements of the Partner Code of Conduct;
- Contracts include enforcement mechanisms such as fines, penalties, and bank guarantees;
- Environmental, social and governance requirements are met.

We follow the payment obligations set out in contracts and the Law of the Republic of Lithuania on the Prevention of Late Payment in Commercial Transactions in order to ensure proper and timely payments. The most substantial purchases are made by employees certified as Procurement Officers, thereby managing compliance risk.

International and national sanctions

We systematically implement international sanctions requirements. In all ongoing procurements, we screen the partners with whom we plan to conclude contracts for the applicability of sanctions. If a partner is found to be subject to international sanctions, we do not enter into contracts, and if such a fact becomes apparent during contract performance, we take steps to terminate the contracts.

In line with the national security policy direction, the Group refrains from awarding or executing procurement contracts with suppliers linked to hostile states or territories:

- We apply additional requirements for the procurement of technical equipment, software, and maintenance or support services;
- We also seek to reduce dependence on product manufacturers and suppliers that do not meet the criteria of European and transatlantic integration, i.e. those not established or registered in Member States of the EU, the North Atlantic Treaty Organization, the European Economic Area, and/or the Organisation for Economic Co-operation and Development.

Contractual obligations of the partners as set out in the Code of Conduct

Zero tolerance of bribery, graft, influence peddling, money laundering, abuse of office and (or) other forms of corruption.

Avoid engaging in any illegal agreements or arrangements that hinder fair competition, including entering into cartels with competitors, such as sharing or allocating markets or customers, or colluding on prices.

Reducing dependence on product manufacturers and suppliers which do not meet the criteria for European and transatlantic integration, i.e. are not established or registered in the Member States of the European Union, the North Atlantic Treaty Organisation, the European Economic Area and (or) the Organisation for Economic Co-operation and Development.

Maintaining transparent, harmonious and cooperative business relationships in line with the PCE and the Anti-Corruption Policy.

Measures for the implementation of the Partner Code of Conduct

The Code of Conduct is publicly disclosed and accessible to all partners.

Partners confirm their commitment to complying with the provisions of the Code of Conduct when entering into contracts.

Partners complete compliance due diligence questionnaires.

An information system is used for the screening process, ensuring data collection and monitoring.

The collected data are analysed, and based on the results, recommendations are provided and improvement measures are identified.

Partners are offered informational and training events aimed at strengthening the implementation of the provisions of the Code of Conduct.

Sustainable supply chain

We aim to manage risks and reduce negative impacts on participants in the value and supply chains; therefore, in the Group’s long-term operational strategy approved in 2025, we have set a strategic direction – ensuring a sustainable supply chain. This direction includes the implementation of sustainable and responsible business practices and active cooperation with operational partners to achieve common sustainability objectives. We are committed to transitioning to circular procurement by 2035, i.e. integrating circularity principles into the procurement process, under which the life-cycle costs of the goods, services, and works procured will be assessed and other established circularity criteria (e.g. recyclability, etc.) will be applied. We will also seek to encourage partners to set and implement GHG reduction targets in accordance with a methodology to be developed in the near term (2026–2027) in cooperation with experts and partners.

Procurement is carried out in accordance with the requirements set out in the Law of the Republic of Lithuania on Public Procurement and the Law of the Republic of Lithuania on Procurement by Contracting Entities Operating in the Water Management, Energy, Transport or Postal Services Sectors. Therefore, only partners that meet the environmental and/or social requirements set by law can participate in procurement. At least one green criterion is applied in all public procurements; therefore, 100% of the public procurements carried out are considered green. Since 2024, we have also applied social criteria; in 2025, such procurements accounted for more than 6.3% in the Company.

We organise internal employee training on social and environmental performance topics in order to improve their skills and knowledge in the area of sustainability-driven procurement and the related procurement processes.

It should be noted that the majority of the Group’s suppliers are local businesses – accounting for more than 80% by number of contracts concluded (more than in 2024). This promotes local economic growth and cooperation with reliable and socially responsible partners.

In 2025, we received a letter of appreciation from the Public Procurement Office for promoting socially responsible procurement within the EPSO-G group of companies. This recognition reflects the consistent efforts of the entire Group – including the Company – to integrate social responsibility principles into procurement processes.

Target	Target value	Progress towards targets	Status
Reduce GHG emissions in the supply chain	Include at least 50% of suppliers in GHG reduction requirements by 2035	The application of criteria is planned to start in 2027	New target
Transition to circular procurement: integrate circularity principles and criteria into procurement	Implement circular procurement from 2035	The application of criteria is planned to start in 2027	New target
Increase the number of green procurements	100% of procurements must meet green procurement requirements	In 2025, all procurements were carried out applying green criteria	Target in progress
Increase the number of procurements applying social criteria	Social criteria must be applied to more than 7% of procurements	In 2025, social criteria were applied in more than 6.3% of procurements. The target has not yet been achieved; however, we observe a steady increase in the indicator from 0% in 2023 and continue to integrate the criteria into procurement processes.	Target not achieved

G1-3 Prevention and detection of corruption and bribery

We are committed to operating transparently, openly, and lawfully; therefore, we apply a zero-tolerance approach to corruption in our activities – we do not tolerate corruption or any related practices. We continuously assess potential corruption risks and, once identified, implement measures to manage them.

Anti-corruption activities are carried out in accordance with legal requirements, best practice, and by implementing the principles of an anti-corruption management system in line with the international standard ISO 37001:2016.

The **Anti-Corruption Policy** is the key document governing our anti-corruption activities, setting out the principles of anti-corruption and defining the rights and responsibilities of persons involved in these activities. This policy has been developed in accordance with the above-mentioned international standard ISO 37001:2016, the United Nations Convention against Corruption, the legal acts of the Republic of Lithuania regulating anti-corruption activities, and good practice. We introduce this policy to stakeholders by publishing it on our website, and in contracts concluded with partners we have established an obligation to familiarise themselves with and comply with it.

Employees are trained on corruption prevention and anti-corruption behaviour using measures approved at Group level. Our general corruption prevention training includes the analysis of practical situations and examples that help identify corruption risks and conduct that may raise concerns regarding transparency.

We continuously identify and assess corruption risk factors, implement measures to manage them and analyse their effectiveness. Company executives do not participate in the examination of incidents potentially related to corruption. This is intended to ensure objectivity and impartiality. This function is carried out by a dedicated organisational unit with the necessary competences and authority to conduct investigations in accordance with established procedures and confidentiality principles.

In line with the Procedure for Conducting Internal Investigations, an Internal Investigation Report is prepared and submitted to the Chief Executive Officer. Where necessary, it may also be provided to the heads of relevant units, but only to the extent required for the performance of their functions and for decision-making related to the investigation findings.

In order to identify, assess and manage potential corruption risks, the Company implements the measures set out in the Anti-Corruption Policy. These measures ensure transparent, accountable, and ethical operations and help strengthen organisational culture:

- **Restrictions on the acceptance and giving of gifts.** To prevent potential conflicts of interest, the Company has established rules governing the acceptance and giving of gifts as well as the provision of support.
- **Measures to management of interests.** Measures ensuring the primacy of the Group's interests are implemented to enable transparent and objective decision-making, and the interests of employees and members of collegial bodies are managed.
- **Screening of business partners.** To avoid cooperation with dishonest or unreliable companies, an assessment of partners' reliability is carried out.
- **Ensuring personnel integrity.** Procedures are applied to assess the honesty and reliability of employees, particularly when filling positions associated with a higher risk of corruption.
- **Trust Line** A functioning channel through which employees and other stakeholders can anonymously report potential violations or indications of corruption.
- **Internal investigations.** All potential violations, including those that may have indications of corruption, are investigated in accordance with the established procedure for internal investigations.
- **Transparency of transactions.** Transactions are subject to transparency measures to avoid possible manipulation or opaque arrangements.
- **Anti-corruption awareness.** Through training, communication, and targeted actions, employees are encouraged to maintain zero tolerance for corruption and are equipped with the skills to act responsibly.
- **Transparent procurement.** Procurements within the Group's companies are carried out in accordance with the principles of transparency, competitiveness, and fairness.

A dedicated **Corruption Prevention** section has been created on the Company's website, where stakeholders can find key information about the Company's anti-corruption activities. This section provides:

- Legal acts governing anti-corruption activities.
- Measures applied for the prevention and control of corruption.
- Links to relevant documents providing detailed information on applicable ethical and transparency standards.
- Contact information for those wishing to submit enquiries or reports.

All this information is available in Lithuanian and English to ensure accessibility for both local and international stakeholders. Information related to anti-corruption activities is provided to employees through an internal communication channel – the intranet

To ensure that suppliers comply with the highest ethical standards, Amber Grid introduces them to the Group's Partner Code of Conduct during the procurement process. This Code sets out the key principles of ethical conduct, including anti-corruption provisions, which the Company expects all its partners and suppliers to comply with.

– in a dedicated section. Employees are regularly informed about relevant corruption prevention issues as needed. In addition, all employees are formally introduced, through the document management system, to the legal acts governing anti-corruption activities.

These measures ensure that both the Company's employees and external partners have a clear understanding of the principles of anti-corruption, their importance and the responsibility for compliance with them.

Corruption prevention measures and training

To foster a culture of transparency and responsibility within the company, Amber Grid consistently organises targeted anti-corruption training. Employee development includes a range of activities designed both for all employees and for specific target groups:

- **Training for all newly hired employees.** Each new employee is introduced to the principles of anti-corruption, the Code of Conduct, and the anti-corruption standards established by the Company.
- **Events and seminars with guest speakers.** Seminars and events with experts and guest speakers are organised on a regular basis to present practical aspects of corruption prevention and share good practice.
- **Ad hoc training.** Targeted training is organised for all employees or specific groups depending on their roles and areas of responsibility. These trainings help to improve knowledge and skills related to corruption prevention.
- **Communication through newsletters and meetings.** Regular communication on corruption prevention issues is carried out through newsletters, emails and working meetings. This helps continuously remind employees of their responsibility to comply with ethics and transparency standards.

Anonymous Zero Tolerance for Corruption Survey An anonymous survey is carried out annually to assess the level of anti-corruption culture in the company and identify areas for improvement. The survey results help further enhance training programmes and related measures.

G1-4 Incidents of corruption or bribery

During the period 2022–2025, no corruption cases were identified or confirmed at Amber Grid. No convictions for violations of anti-corruption or anti-bribery laws were issued during this period. The Company was also not subject to any fines or other sanctions related to such violations.

These results confirm Amber Grid's consistent efforts to implement the principles of transparency and responsible conduct, ensuring that all processes comply with the highest ethical standards.

Anti-corruption metrics

	2025	2024	2023
Confirmed incidents of corruption	0	0	0
Staff members sanctioned or dismissed for corruption	0	0	0
Corruption-related lawsuits against the Company / employees	0	0	0
Identified corruption cases that resulted in contracts with business partners not being concluded or renewed	0	0	0

G1-5 Lobbying activities

We do not engage in lobbying or political activities.

G1-6 Payment practices

The Company aims to ensure clear and transparent payment terms that allow for smooth cooperation with suppliers. In 2025, the Company's average payment period for all invoices was 27.3 days (2024: 27.4 days).

Main contractual payment terms:

- 8 calendar days from the date of invoicing – applies to 2.7% of all invoices.
- 14 calendar days from the date of invoicing – applies to 3.6% of all invoices.
- 17 calendar days from the date of invoicing - applies to 10.9% of all invoices.
- 30 calendar days from the date of invoicing – applies to 82.8% of all invoices.

The payment analysis covers all payments made in 2025, including invoices issued in previous periods. Advance payments and advances paid to accountable persons are not included in the calculations.

The company currently has no ongoing disputes over late payments to suppliers.

To ensure financial stability in the supply chain, the Company follows a responsible payment policy. Clearly defined payment terms enable suppliers to plan their cash flows, while timely payments contribute to trust-based business relationships.

We comply with the payment terms set out in contracts with business partners and apply the principle of non-discrimination; therefore, small and medium-sized enterprises are subject to the same payment conditions as large companies.

6.5. Annexes

EU Taxonomy regulation indicators

The European Union (EU) Taxonomy Regulation (EU) 2020/852 and its associated delegated acts (hereinafter referred to as the Taxonomy) establish a classification system for environmentally sustainable economic activities. This system aims to promote private investment in activities that contribute to achieving the goals of the European Green Deal. The Taxonomy sets out science-based criteria for assessing the sustainability of economic activities and establishes corporate accountability and reporting obligations.

Amber Grid's identification of taxonomy-aligned economic activities, assessment of compliance with technical screening criteria, evaluation of climate-related risks and vulnerabilities, assessment of compliance with minimum safeguards, and calculation of taxonomy-non-eligible activity indicators are presented in EPSO-G's Integrated Annual Report 2025, in the section "Disclosure under the EU Taxonomy Regulation".

Below are the tables of Amber Grid's Taxonomy indicators (revenue, capital expenditure, and operating expenditure), prepared in accordance with the requirements and templates of the European Commission's Delegated Regulation (EU) 2021/2178.

Turnover according to EU Taxonomy, 2025

Economic activity	Code	Turnover	Proportion of turnover year 2025	Substantial contribution criteria						Do no significant harm criteria						Proportion of taxonomy-aligned turnover, 2024 (%)	Enabling activities (E)	Transition activities (T)	
				Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity				Minimum safeguards
A. TAXONOMY ELIGIBLE ACTIVITIES		million Eur	%	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	%	E	T
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation using solar photovoltaic technology	CCM 4.1. / CCA 4.1.	0	0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	-	
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14. / CCA 4.14.	0.3	0.4%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.2%	-	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4. / CCA 7.4.	0	0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	E	
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.3	0.4%	-	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0.2%		

Of which: enabling activities	0	0	-	N	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E
Of which: Transitional activities	-	-	-							-	-	-	-	-	-	-	-	
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																		
Transport by motorbikes, passenger cars and light commercial vehicles.	CCM 6.5. / CCA 6.5.	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%
Renovation of existing buildings	CCM 7.2. / CCA 7.2.	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	%	-	-	-	-	-	-									0%
Turnover of Taxonomy-eligible activities (A.1+A.2)		0.3	0.4%	-	-	-	-	-	-									0.2%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
Turnover of Taxonomy-non-eligible activities		69.4	99.6%															99.8%
Total (A+B)		69.7	100%															100%

Explanation of abbreviations:

EL – Taxonomy-eligible activity for the relevant objective

N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

Capital Expenditure (CapEx) under the EU Taxonomy 2025

Economic activity	Code	CapEx	Proportion of CapEx, 2025	Climate change		Substantial contribution criteria				Do no significant harm criteria					Proportion of taxonomy-aligned CapEx, 2024 (%)	Enabling activities (E)	Transition activities (T)			
				mitigation	adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy				Biodiversity	Minimum safeguards	
A. TAXONOMY ACTIVITIES	ELIGIBLE	million Eur	%	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	%	E	T
A.1 Environmentally sustainable activities (Taxonomy-aligned)																				
Electricity generation using solar photovoltaic technology	CCM 4.1. / CCA 4.1.	0.02	0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%	-	
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14. / CCA 4.14.	0	0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%	-	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4. / CCA 7.4.	0	0.5%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0.7%	E	
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.1	0.5%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0.7%		

Of which: enabling activities	0	0	-	N	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E
Of which: Transitional activities	-	-	-							-	-	-	-	-	-	-	-	-
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																		
Transport by motorbikes, passenger cars and light commercial vehicles.	CCM 6.5. / CCA 6.5.	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									1.4%
Renovation of existing buildings	CCM 7.2. / CCA 7.2.	0.3	1.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									19.4%
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0.3	1.6%	0	-	-	-	-	-									20.8%
CapEx of Taxonomy-eligible activities (A.1+A.2)		0.4	2.1%	0	-	-	-	-	-									21.5%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
Capex of Taxonomy-non-eligible activities		16.7	99.7%															78.5%
Total (A+B)		16.8	100%															100%

Explanation of abbreviations:

EL – Taxonomy-eligible activity for the relevant objective

Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective



N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

Operating Expenditure (OpEx) under the EU Taxonomy 2025

Economic activity	Code	OpEx	Proportion of OpEx, 2025	Substantial contribution criteria						Do no significant harm criteria						Percentage of taxonomy-aligned activity expenditure, 2024 (%)	Enabling activities (E)	Transition activities (T)	
				Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Pollution	Circular economy	Biodiversity				Minimum safeguards
A. TAXONOMY ELIGIBLE ACTIVITIES		million Eur	%	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N/ N/EL	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	Y/ N	%	E	T
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Electricity generation using solar photovoltaic technology	CCM 4.1. / CCA 4.1.	0.0	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	-	
Transmission and distribution networks for renewable and low-carbon gases	CCM 4.14. / CCA 4.14.	0.0	0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	-	
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4. / CCA 7.4.	0.1	0%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	E	
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.1	0.1%	Y	N	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%		

Of which: enabling activities	0	0	-	N	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0	E
Of which: Transitional activities	-	-	-							-	-	-	-	-	-	-	-	-
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																		
Transport by motorbikes, passenger cars and light commercial vehicles.	CCM 6.5. / CCA 6.5.	0.03	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0.2%
Renovation of existing buildings	CCM 7.2. / CCA 7.2.	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0.03	0.2%	0	-	-	-	-	-									0.2%
OpEx of Taxonomy-eligible activities (A.1+A.2)		0.05	0.3%	0	-	-	-	-	-									0.2%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
OpEx of Taxonomy-non-eligible activities		20.5	100%															99.8%
Total (A+B)		20.9	100%															100%

Explanation of abbreviations:

- EL – Taxonomy-eligible activity for the relevant objective
- N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective
- Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
- N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective
- N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

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Strategy		

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List of data points from horizontal and topical standards required under other EU legislation

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ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		65
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		65
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				67
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU)	Delegated Regulation (EU) 2020/1816, Annex II		68

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		2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk			
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 ⁷ , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	91
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		91
ESRS E1-4 GHG emission reduction targets	paragraph 34 Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		102
ESRS E1-5 Energy consumption from fossil sources disaggregated	Indicator number 5 Table #1 and Indicator n. 5				105

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by sources (only high climate impact sectors) paragraph 38	Table #2 of Annex 1				
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				105
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				105
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		107
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate Change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		107
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	111
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Phased-in disclosure requirement
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change			Phased-in disclosure requirement

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
		physical risk: Exposures subject to physical risk.			
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book - Climate Change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Phased-in disclosure requirement
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Phased-in disclosure requirement
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				113
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material
ESRS 2 SBM-3 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				115
ESRS 2 SBM-3 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				115
ESRS 2 SBM-3 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				115
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Not applicable
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Not applicable
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Not applicable
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				122
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				122
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ESRS S1-1 Due diligence policies on issues addressed by the			Delegated Regulation (EU) 2020/1816, Annex II		126

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
fundamental International Labor Organisation Conventions 1 to 8, paragraph 21					
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ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Not material
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Not material

Disclosure requirement and related data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Page
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material
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ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		80
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ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	94
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Non-material
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book-Climate change physical risk: Exposures subject to physical risk.			Non-material
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book-Climate Change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Non-material

ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69			Commission Delegated Regulation (EU) 2020/1818, Annex II		Non-material
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				96
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ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table #2 of Annex 1				Non-material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Non-material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Non-material
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Non-material
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				77
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ESRS 2- SBM3 - S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Non-material
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Non-material
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Non-material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Non-material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Commission Delegated Regulation (EU) 2020/1816, Annex II		Non-material
ESRS S2-4 Human rights issues and incidents connected to its	Indicator number 14 Table #3 of Annex 1				Non-material

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ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				121
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		121
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				123
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Non-material
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Non-material
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Non-material
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				125
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				125
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ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				129

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Significant events during the reporting period



8. Significant events during the reporting period

In fulfilling its obligations under legal acts governing the securities market applicable to it, the Company publishes significant events and other regulated information at the EU level. This information is accessible on the Company's website (www.ambergrid.lt/lt/apie_mus/rubrika-investuotojams/esminiai-ivykiai) and on the website of NASDAQ Vilnius Stock Exchange (www.nasdaqbaltic.com).

Significant events during the reporting period

Date	Material events during the reporting period
13/01/2025	Announcement of the selection of candidates for the position of CEO of Amber Grid
15/01/2025	Approval of Amber Grid Strategy 2035
28/02/2025	Amber Grid AB Operating Results for the year 2024
26/03/2025	Correction: Amber Grid investor calendar for 2024
04/04/2025	Amber Grid Board appointed Nemunas Biknius as the CEO of the Company for the new term
07/04/2025	Notice on Convening of the Ordinary General Meeting of Shareholders of AB Amber Grid
30/04/2025	On Natural Gas Transmission System Operator's Revenue Cap of Regulated Activities for 2026
30/04/2025	Decisions adopted in the Ordinary General Meeting of Shareholders of AB Amber Grid
30/04/2025	Annual Information of Amber Grid for 2024
02/05/2025	Ex-Dividend Date
09/05/2025	Amber Grid AB Operating Results for Q1 2025
09/05/2024	Procedure for the payment of AB Amber Grid dividends for 2024
29/05/2025	Approval of new prices for natural gas transmission services
29/05/2025	Correction: Approval of new prices for natural gas transmission services
01/08/2025	EPSO-G will refinance short term Amber Grid financial debt
08/08/2025	AB Amber Grid Operating Results for the first half of 2025
20/08/2025	Notice on Convening of the Extraordinary General Meeting of Shareholders of AB Amber Grid
10/09/2025	Decisions adopted in the Extraordinary General Meeting of Shareholders of AB Amber Grid
10/10/2025	Amber Grid and EEX have completed the transfer of GET Baltic's operations
07/11/2025	AB Amber Grid Operating Results for 9 months of 2025
18/12/2025	Notice on Convening of the Extraordinary General Meeting of Shareholders of AB Amber Grid
22/12/2025	AB Amber Grid entered into a tripartite loan transfer agreement and a new internal loan agreement with UAB EPSO-G
29/12/2025	Agreement Signed on Gas Transit to Kaliningrad

All notices that are made available to public according to the procedure defined in legal acts can be found in an electronic publication of the Manager of the Register of Legal Entities. All notices on convening the Company's General Meeting of Shareholders and other material events are announced on the Central Storage Facility at www.crib.lt and on the Company's official website www.ambergrid.lt in accordance with the procedure established in the Law on Securities. The shareholders whose shares entitle them to at least 10% of total voting rights, receive notices on convocation of the General Meetings of Shareholders in accordance with the procedure established in the Company's Articles of Association.

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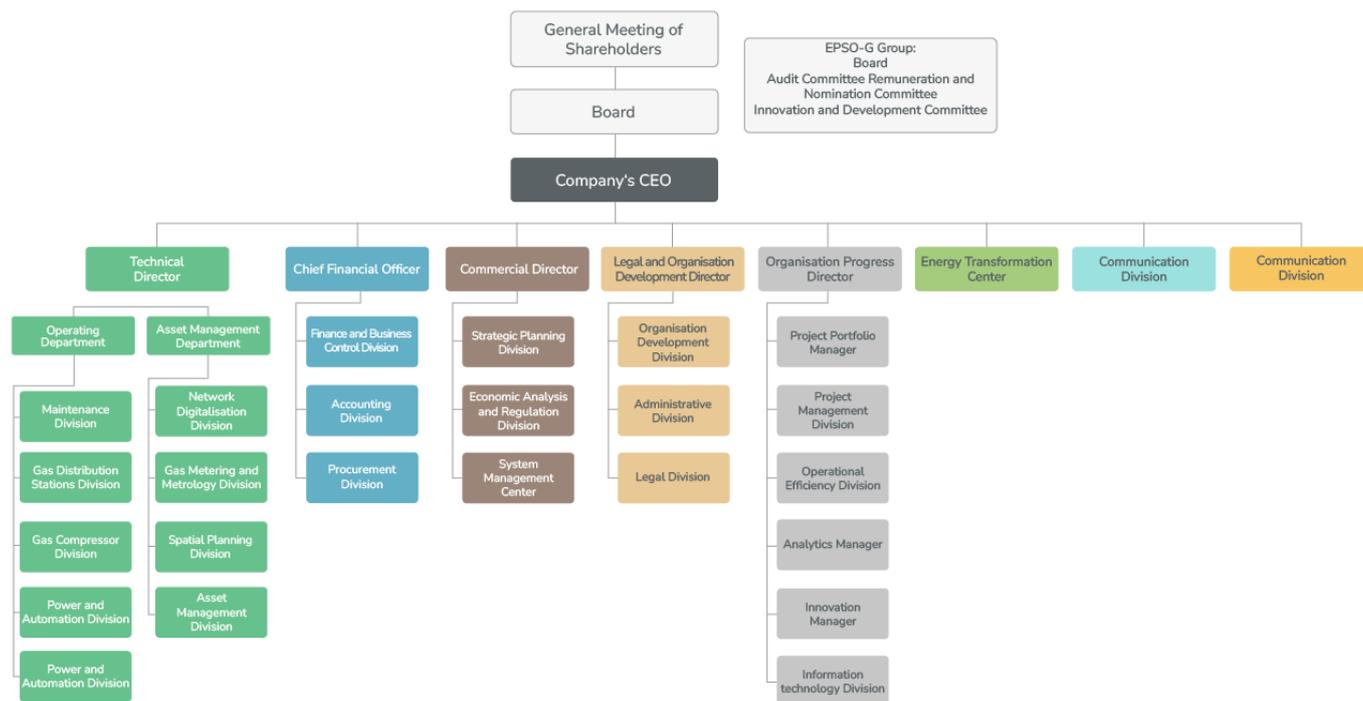
Annexes



9. Annexes

Annex 1

Amber Grid Management Structure



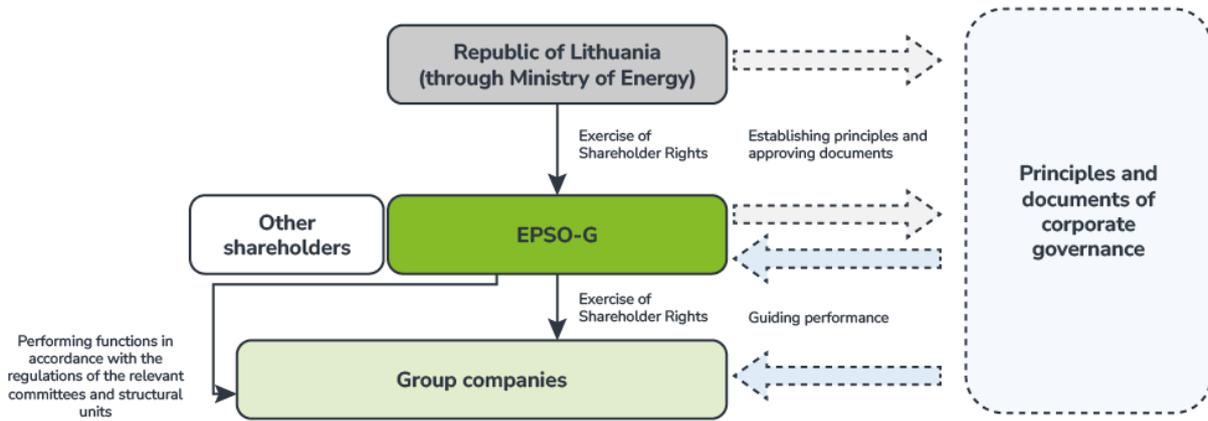
Annex 2

Amber Grid AB statement of compliance with the Corporate Governance Code for the Companies Listed on NASDAQ OMX AB

In line with Article 12(3) of the Law on Securities of the Republic of Lithuania and paragraph 24.5 of the Listing Rules of Nasdaq Vilnius AB, Amber Grid AB (the “**Company**”) has disclosed its compliance with the Corporate Governance Code for the Companies Listed on Nasdaq Vilnius and its specific provisions or recommendations. In case of non-compliance with the Code or some of its provisions or recommendations, the specific provisions or recommendations that are not complied with must be indicated, the reasons for such non-compliance must be specified, and other explanatory information indicated in this form must be presented.

1 Summary of the Company’s Corporate Governance Report:

Amber Grid AB is a part of the EPSO-G Group companies (“the Group”). The Company’s management structure and governance model are determined by the Company’s Articles of Association, the Corporate Governance Guidelines of the EPSO-G Group approved on 29 December 2022 by the Ministry of Energy (the ME), the sole shareholder of the parent company EPSO-G UAB, and the Corporate Governance Policy of the EPSO-G Group. All these documents are available on the Company’s website (www.ambergrid.lt) and EPSO-G’s website (www.epsog.lt).



Being a part of the Group does not affect the Company’s independence. The Company operates independently as it seeks to achieve the objectives set in the Company’s Articles of Association, and it has the obligation to independently assess whether compliance with the Group’s corporate governance documents does not harm the interests of the Company, its creditors, shareholders or other stakeholders.

Corporate governance structure



The Group has a centralised internal audit function. In order to ensure the independence of the internal audit, it is established that the head of the internal audit function is appointed and dismissed by the Board of EPSO-G UAB, which is mainly composed of independent members. The internal audit function is also accountable to the Audit Committee, which also consists mostly of independent members. The internal audit recommendations are analysed by the Company’s Board, which also approves the plan of measures for implementation of audit recommendations.

On the basis of the Risk Management Policy of the EPSO-G Group, a uniform risk management system of the Group has been implemented at the Company according to the COSO ERM standards applicable in a global practice, which set out the risk identification, assessment and management principles and responsibilities. Risk management coordination is performed at the Group level.

The purpose of the Group’s operating policies is to introduce a consistent and effective organisation management system that helps employees successfully implement important strategic projects and create value to local private and business customers in a transparent and effective manner. To ensure the effectiveness of the operating policies, the Company annually reports on the progress achieved with the implementation of the operating policies.

The operating policies that are currently effective at the Company



In the Report on Corporate Governance of State-Owned Enterprises, the Group states that it has implemented and complies with the principles of good governance. The Group is awarded the highest A+ rating. The standards of transparency, formed collegial bodies and the strategy are carried out at the highest scores. Corporate governance is awarded A rating.

Principles/recommendations	Yes/No/Not Applicable	Comments
1 Principle: General Meeting of Shareholders, fair treatment of shareholders and shareholders' rights The corporate governance system should ensure fair treatment of all shareholders. The corporate governance system should protect shareholders' rights.		
1.1.All shareholders should have equal access to the information and/or documents provided for by law and should be able to participate in decisions that are important for the company.	Yes	Pursuant to the Law on Companies of the Republic of Lithuania and Chapter IX of the Company's Articles of Association, information on general meetings of shareholders being convened, their draft decisions and decisions made is published on the Company's website and on NASDAQ OMX Vilnius stock exchange in the Lithuanian and English languages. The Company ensures equal opportunities to its shareholders to vote on the adoption of relevant decisions at the General Meetings of Shareholders (by completing the general voting ballot, representing a shareholder by proxy, etc.).
1.2.It is recommended that a company's capital should consist only of shares that give their holders equal voting, ownership, dividend and other rights.	Yes	The Company's issued capital is divided into ordinary registered shares with the nominal value of EUR 0.29 each. All the shares grant the same rights to voting, ownership, dividend and other rights to their holders in proportion to the number of shares held. All shares are intangible and recorded in the personal securities accounts of the shareholders managed by the securities account manager contracted to manage the share accounting.
1.3.It is recommended that investors should have access to the information concerning the rights attached to the shares of the new issue or those issued earlier in advance, i.e. before they purchase shares.	Yes	Please see paragraph 1.2. Including the rights and obligations of the shareholders are stipulated in Chapter IV of the Company's Articles of Association that are made available to public.
1.4.Exceptional transactions of major importance, such as the disposal of all or almost all of the company's assets, which would effectively amount to a disposal of the company, should be subject to the approval of the General Meeting of Shareholders.	Yes	Paragraph 38 of the Company's Articles of Association specifies the cases when a transaction requires approval of the Board or the General Meeting of Shareholders.

<p>1.5.The procedures for organising and participating in the General Meeting of Shareholders should give shareholders equal opportunities to participate in the General Meeting of Shareholders and should not prejudice the rights and interests of shareholders. The choice of the place, date and time of the General Meeting should not preclude the active participation of shareholders in the General Meeting. In the notice of the General Meeting, the company should indicate the latest date on which the proposed draft resolutions can be submitted.</p>	Yes	<p>The Company convenes the General Meetings of Shareholders and implements other meeting-related procedures in accordance with the procedure established in the Law on Companies of the Republic of Lithuania. In addition, each time the General Meeting of Shareholders is convened, the general rights of the shareholders and the deadlines for exercising such rights are published on the Notice of Convening the General Meeting of Shareholders and on the Company's website.</p>
<p>1.6.In order to ensure the right of shareholders living abroad to access information, it is recommended that, where possible, the documents prepared for the General Meeting of Shareholders be made public in advance not only in Lithuanian, but also in English and/or in other foreign languages. It is also recommended that the minutes of the General Meeting of Shareholders, after signing, and/or the decisions adopted be made public not only in Lithuanian but also in English and/or other foreign languages. It is recommended that this information be published on the company's website. Not all documents may be made publicly available if their public disclosure would be prejudicial to the company or would disclose the company's business secrets.</p>	Yes	<p>Information on the general meetings of shareholders being convened, their draft decisions and decisions made are published on the Company's website and on NASDAQ Vilnius stock exchange in the Lithuanian and English languages, by indicating location, date and time of the meeting.</p>
<p>1.7.Shareholders entitled to vote should be able to vote at the meeting of shareholders, either present or absent in person. Shareholders should not be prevented from voting in advance in writing by completing a single ballot paper.</p>	Yes	<p>A notice of convening the General Meeting of Shareholders always indicates a possibility for the shareholders to vote in writing by filling in the attached form of a voting ballot or to vote by proxy.</p>
<p>1.8.In order to increase shareholders' ability to participate in General Meetings of Shareholders, it is recommended that companies should make greater use of modern technology to enable shareholders to participate and vote in General Meetings of Shareholders by electronic means. In such cases, the security of the information transmitted must be guaranteed and the identity of the person who participated and voted must be identifiable.</p>	No	<p>Given the challenges in ensuring the security of the information transmitted and the establishment of the identity of shareholders, these options are not yet available to shareholders. However, shareholders are provided with other opportunities to exercise their rights: to vote in the General Meeting of Shareholders in person; to vote by proxy; to vote by concluding voting rights entrustment agreement; voting in writing in advance by completing the general voting ballot.</p>
<p>1.9.It is recommended to disclose in the notice of the draft decisions of the convened General Meeting of the Shareholder the new nominations of the members of the collegial body, the remuneration proposed for them, the proposed appointment of the audit company, if these issues are included in the agenda of the General Meeting of Shareholders. When proposing to elect a new member of the collegial body, it is recommended that the member's educational background, work experience and other management positions held (or proposed to be held) be disclosed.</p>	Yes	<p>A notice of convening the General Meeting of Shareholders always specifies the draft decisions containing information required by the Law on Companies of the Republic of Lithuania, including new candidatures of members of the collegial bodies, the proposed remuneration, the proposed audit firm and the proposed audit fee.</p>
<p>1.10.Members of the Company's collegial management body, heads of the administration⁴ or other competent persons related to the Company who can provide information related to the agenda of the general meeting of shareholders should take part in the general meeting of shareholders.</p> <p>1.11.Proposed candidates to member of the collegial body should also participate in the general meeting of shareholders in case the election of new members is included into the agenda of the general meeting of shareholders.</p>	Yes No	<p>Relevant competent persons who can provide information related to the agenda of the General Meeting of Shareholders always attend the General Meeting of Shareholders. The proposed candidates to the members of the collegial bodies do not always attend the General Meetings of Shareholders.</p>
<p>2. Establishment of the Supervisory Council</p>		
<p>2.1. The procedure for the establishment of the Supervisory Council should ensure that conflicts of interest are properly managed and that the company is governed efficiently and fairly.</p>		
<p>2.1.1.The members of the Supervisory Council elected by the General Meeting of Shareholders should collectively ensure a diversity of qualifications, professional experience and competences, as well as a gender balance. In order to maintain an appropriate balance between the qualifications of the members of the Supervisory Council, it should be ensured that the members of the Supervisory Council as a whole have a broad range of knowledge, views and experience to perform their tasks properly.</p>	Not applicable	<p>Supervisory Council is not formed at the Company.</p>

⁴ For the purposes of this Code, heads of the administration are the employees of the company who hold top level management positions.

<p>2.1.2. Members of the Supervisory Council should be appointed for a fixed term, with the possibility of individual re-election for a new term, in order to ensure the necessary growth in professional experience.</p>	<p>Not applicable</p>	<p>Supervisory Council is not formed at the Company.</p>
<p>2.1.3. The Chair of the Supervisory Council should be a person whose current or former position would not be an obstacle to the impartial exercise of his/her functions. A former CEO or the Board member of the company should not immediately be appointed as a Chair of the Supervisory Council. Where a company chooses not to comply with these recommendations, information should be provided on the measures taken to ensure operational impartiality.</p>	<p>Not applicable</p>	<p>Supervisory Council is not formed at the Company.</p>
<p>2.1.4. Each member should devote sufficient time and attention to his/her duties as a member of the Supervisory Council. Each member of the Supervisory Council should undertake to limit his/her other professional commitments (in particular management positions in other companies) in such a way that they do not interfere with the proper performance of his/her duties as a member of the Supervisory Council. If a member of the Supervisory Council attended less than half of the Supervisory Council meetings during the company's financial year, the company's shareholders should be informed.</p>	<p>Not applicable</p>	<p>Supervisory Council is not formed at the Company.</p>
<p>2.1.5. Where the appointment of a member of the Supervisory Council is proposed, it should be disclosed which members of the Supervisory Board are considered independent. The Supervisory Council may decide that, despite the fact that a particular member meets all the criteria of independence, he/she cannot be considered independent due to special personal or company-related circumstances.</p>	<p>Not applicable</p>	<p>Supervisory Council is not formed at the Company.</p>
<p>2.1.6. The amount of remuneration for members of the Supervisory Council should be approved by the company's General Meeting of Shareholders for their activities and participation in the meetings of the Supervisory Council.</p>	<p>Not applicable</p>	<p>Supervisory Council is not formed at the Company.</p>
<p>2.1.7. The Supervisory Council should carry out an evaluation of its own performance each year. It should include an assessment of the structure, organisation and ability to act as a group, as well as an assessment of the competence and effectiveness of each member of the Supervisory Council and an assessment of whether the Supervisory Council has achieved its stated performance objectives. The Supervisory Council should publish, at least once a year, relevant information on its internal structure and operating procedures.</p>	<p>Not applicable</p>	<p>Supervisory Council is not formed at the Company.</p>
<p>3 Principle: Board 3.1. Functions and responsibilities of the Board The Board should ensure the implementation of the company's strategy, as well as good corporate governance, taking into account the interests of shareholders, employees and other stakeholders.</p>		
<p>3.1.1. The Board should ensure the implementation of the company's strategy, as approved by the Supervisory Council, if it is established. In cases where the Supervisory Council is not established, the Board is also responsible for approving the company's strategy.</p>	<p>Yes</p>	<p>Paragraph 34 of the Company's Articles of Association stipulates the power of the Company's Board to approve the Company's strategy and supervise its implementation. In addition, in carrying out its supervisory function the Board regularly reviews reports on the implementation of the strategy.</p>

<p>3.1.2.The Board, as the collegial management body of the company, performs the functions assigned to it by the Law and the company’s Articles of Association and, in cases where the company does not have a Supervisory Board, also performs the supervisory functions provided for in the Law. In carrying out its functions, the Board should take into account the needs of the company, shareholders, employees and other stakeholders, as appropriate, in order to build a sustainable business.</p>	<p>Yes</p>	<p>Section 7.3 of the Company’s Articles of Association stipulates that the Company’s Board undertakes the supervisory functions. By performing the functions assigned to it, the Board takes into account the Audit Committee’s recommendations, as well as the needs of the company’s shareholders, employees and other stakeholders.</p>
<p>3.1.3.The Board should ensure compliance with the laws and internal company policies applicable to the company or group of companies to which it belongs. It should also put in place appropriate risk management and control measures to ensure regular and direct accountability of executives.</p>	<p>Yes</p>	<p>Article 36 paragraph (xxi) of the Company’s Articles of Association provides that the Board takes decisions on the non-application to the Company or the application with exceptions of the documents applicable at the level of the Group of companies approved by the Board of the parent company.</p> <p>The Board ensures and regularly monitors the implementation of the documents it approves (strategy, performance plans, budget, etc.) within the Company.</p>
<p>3.1.4.Moreover, the management board should ensure that the measures included into the OECD Good Practice Guidance⁵ on Internal Controls, Ethics and Compliance are applied at the company in order to ensure adherence to the applicable laws, rules and standards.</p>	<p>Yes</p>	<p>The Company’s Board ensures and monitors implementation of internal controls, ethics and compliance measures as follows:</p> <ul style="list-style-type: none"> - there is an internal audit function at the group level; - the Audit Committee is formed at the group level, mostly consisting of independent members, with the internal audit function accountable to it; - there is the Code of Conduct and the EPSO-G Group Anti-Corruption Policy, the EPSO-G Group Sponsorship and Charity Policy, Sponsorship and Charity Policy, and the EPSO-G Group Conflict of Interest Management Policy in place.
<p>3.1.5.In appointing the Company’s CEO, the Board should take into account the appropriate balance of qualifications, experience and competence of the candidate.</p>	<p>Yes</p>	<p>When the Board appoints the head of the Company, it follows the procedure approved by Resolution of the Government of the Republic of Lithuania for the selection of candidates to a collegial supervisory or management body of a state-owned or municipal enterprise or of a company or its subsidiary owned by a state-owned or municipal enterprise, also takes into account the recommendations of the Remuneration and Nomination Committee (Clause 53 of the Company’s Articles of Association), and the appropriate balance between the candidate’s qualification, experience and competence.</p> <p>Article 55 of the Company’s Articles of Association provides that, when assessing the suitability of a candidate for the position of CEO, the Board shall assess the candidate’s compliance with the requirements set out in the Articles of Association and applicable legislation and may, for that purpose, require the candidate to submit documents substantiating such compliance and/or request the competent public authorities to provide the necessary information about the candidate.</p>

3.2.Establishment of the Board

⁵ For the purposes of this Code, heads of the administration are the employees of the company who hold top level management positions.

For the purposes of this Code, the criteria of independence of members of the supervisory council are interpreted as the criteria of unrelated parties defined in Article 31(7) and (8) of the Law on Companies of the Republic of Lithuania.

<p>3.2.1.The members of the Board elected by the Supervisory Board or by the General Meeting of Shareholders if no Supervisory Council is established should collectively ensure a diversity of qualifications, professional experience and competences, and strive for gender balance. In order to maintain an appropriate balance between the qualifications of the members of the Board, it should be ensured that the members of the Board as a whole have a wide range of knowledge, views and experience to perform their tasks adequately.</p>	<p>Yes</p>	<p>Paragraph 27 of the Company’s Articles of Association stipulates that in the process of selection of the Board members it is ensured that the Board consists of at least 2 (two) independent members. Their independence is established in accordance with the criteria laid down in the Corporate Governance Code and the Policy for Management of Interests of Members of Collegial Bodies, Executives and Employees of the Group, as well as the requirements set forth in other applicable legal acts. It is aimed that the Board members have competences that are required in the areas of responsibility and functions of the Board.</p> <p>The selection of the Company’s Board members is carried out by the Remuneration and Nomination Committee in accordance with the approved matrix of the Board competences.</p> <p>The Board members carry out their performance assessment on annual basis. In addition, the Remuneration and Nomination Committee evaluates the performance of the Board on an annual basis and provides recommendations on performance improvement.</p>
<p>3.2.2.The names of the candidates for election to the Board, their education, qualifications, professional experience, positions held, other relevant professional commitments and potential conflicts of interest should be disclosed, without prejudice to the requirements of the legislation governing the processing of personal data, at the meeting of the Supervisory Council at which the Board or its individual members will be elected. If the Supervisory Council is not established, the information set out in this point should be submitted to the General Meeting of Shareholders.</p> <p>The Board should compile the data on its members referred to in this point each year and disclose it in the company’s annual report.</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company’s interim and annual report and on the Company’s official website.</p>
<p>3.2.3.All new members of the Board should be briefed on their duties, the company’s structure and its activities.</p>	<p>Yes</p>	<p>The Board members are introduced to their duties, the structure and activities of the Company by sharing with them the Company’s corporate documents – a set of such documents is sent by email to the newly elected Board members.</p>
<p>3.2.4.Members of the Board should be appointed for a fixed term, with the possibility of individual re-election, in order to ensure the necessary growth in professional experience and sufficiently frequent reconfirmation of their status.</p>	<p>Yes</p>	<p>Paragraph 26 of the Company’s Articles of Association stipulates that the Board is a collegial management body of the Company consisting of five members. The members of the Board are elected for a four-year term of office by the General Meeting of Shareholders, to which the Board is accountable. A member of the Board may not serve as a member of the Board for more than two consecutive full Board terms and in any case may not serve as a member of the Board for more than 10 (ten) consecutive years.</p>
<p>3.2.5.The Chair of the Board should be a person whose current or former position would not be an obstacle to the impartial conduct of business. A former CEO of the company should not immediately be appointed as a Chair of the Board. Where a company chooses not to comply with these recommendations, information should be provided on the measures taken to ensure operational impartiality.</p>	<p>Yes</p>	<p>Paragraph 28 of the Company’s Articles of Association stipulates the criteria prohibiting a person to be elected as a member of the Board.</p> <p>Article 28 of the Company’s Articles of Association provides the criteria according to which a person cannot be elected as a member of the Board. Article 46 of the Company’s Articles of Association provides that the chairperson of the Board should be elected from among the Board members nominated by the parent company.</p>
<p>3.2.6.Each member should devote sufficient time and attention to his or her duties as a Board member. If a member of the Board has attended less than half of the meetings of the Board during the company’s financial year, the company’s Supervisory Council should be informed, or, if there is no Supervisory Council, the General Meeting of Shareholders.</p>	<p>Yes</p>	<p>The Board members actively attend the meetings, and the minutes of the meetings provide records of attendance and voting by the Board members during the decision-making process.</p> <p>As provided for in Paragraph 51 of the Company’s Articles of Association, the Board of the Company shall account for its activities by providing the General Meeting of Shareholders with its annual report of activities on the Board, including information about adopted resolutions and the annual self-assessment. The report can be submitted within the framework of the annual report of the Company.</p>
<p>3.2.7.If, in the cases provided for in the Law, when the Board is elected in the absence of a Supervisory Council, some of the members of the Board</p>	<p>Yes</p>	<p>The Company’s website and the annual report contain information about the Company’s Board members, with specific indication of which members are independent.</p>

<p>will be independent⁶, it should be published which members of the Board are considered independent. The Board may decide that a particular member of the Board, although fulfilling all the criteria for independence set out in the Law, may not be considered independent because of special personal or company-related circumstances.</p>		<p>At each Board meeting, the Board members are required to declare potential conflicts of interest related to the agenda items.</p>
<p>3.2.8. The amount of remuneration to be paid to members of the Board for their activities and participation in Board meetings should be approved by the company's General Meeting of Shareholders.</p>	<p>Yes</p>	<p>Article 25 of the Company's Articles of Association provides that the General Meeting of Shareholders decides on the appointment and removal of Board members, fixing the remuneration of Board members, conclusion of contracts with Board members and their standard terms and conditions. Based on the decision of the General Meeting of Shareholders, a fixed monthly pay for service at the Board and for activities at the group's committees has been set only for independent Board members.</p>
<p>3.2.9. Board members should act honestly, diligently and responsibly in the best interests of the company and its shareholders and represent their interests, taking into account other interest holders. They should not pursue personal interests in their decision-making, should be subject to non-competition agreements, and should not, to the detriment of the company's interests, take advantage of business information and opportunities that are relevant to the company's activities.</p>	<p>Yes</p>	<p>Taking into account the objective to monitor the absence of conflicts of interest of the Company's Board members, each year the Board members update their declarations of interests, and the independent members are assessed for their independence. In addition, paragraph 31 of the Company's Articles of Association stipulates that the Board members may be employed elsewhere or hold other job position compatible with their activities in the Board, including but not limited to executive positions in other legal entities, a job in a state or statutory service, duties at the Company and other legal entities (in view of the restrictions set in paragraph 28 of the Articles of Association), as well as in legal entities where the Company or the parent company acts as a member, only by providing a prior notice to the Company's Board. The Company has adopted the Policy of Management of Interests of Members of Collegial Bodies, Executives and Employees of EPSO-G Group. Members of the Boards have signed commitments to protect the information confidential. No-compete agreements are not concluded with the members of the Board. The need for such agreements was not established because the Company conducts a monopoly business.</p>
<p>3.2.10. Every year the management board should carry out an assessment of its activities. It should include an assessment of the structure, organisation and ability to act as a group, as well as an assessment of the competence and effectiveness of each member of the Board and an assessment of whether the Board has achieved its stated performance objectives. The management board should, at least once a year, make public respective information about its internal structure and working procedures in observance of the legal acts regulating the processing of personal data.</p>	<p>Yes</p>	<p>The Board carries out a self-assessment of its activities annually, and on its basis prepares a performance improvement plan. In addition, the Remuneration and Nomination Committee and the Audit Committee, acting at the EPSO-G Group level, evaluate annually decisions made by the Board and provide recommendations on performance improvement. The results of assessment of the Board's activities are presented in the Company's annual report.</p>
<p>4 Principle: Working procedures of the Company's Supervisory Council and the Board The company's procedures for the work of the Supervisory Council, if established, and the Board should ensure the effective work and decision-making of these bodies and promote active cooperation between the company's bodies.</p>		
<p>4.1. The Board and the Supervisory Council, if established, should work closely together for the benefit of both the company and its shareholders. Good corporate governance requires an open discussion between the management board and the supervisory board. The Board should regularly and, if necessary, promptly inform the Supervisory Council of all matters of importance to the company in relation to planning, business development, risk management and control, and compliance with the company's obligations. The Board should inform the supervisory board about any derogations in its business development from the previously formulated plans and objectives by specifying the reasons for this.</p>	<p>Not applicable</p>	<p>The Supervisory Council is not formed at the Company.</p>

<p>4.2. It is recommended that meetings of the company’s collegial bodies be held at appropriate intervals in accordance with a pre-approved schedule. It is up to each company to decide on the frequency of meetings of the collegial bodies, but it is recommended that they should be held at such a frequency as to ensure the uninterrupted discussion of the company’s key governance issues. Meetings of the company’s collegial bodies should be convened at least once a quarter of the year.</p>	<p>Yes</p>	<p>Article 45 of the Company’s Article of Association provides that the Board shall adopt its resolutions at the meetings of the Board. The regulation of the convocation of Board meetings and the voting procedure, as well as other procedural issues shall be as provided by the Law on Companies and related legal acts, and shall be defined in detail in the rules of procedure of the Board, which shall be approved by the Board.</p> <p>At the end/beginning of each year, the Company’s Board approves the schedule and activity plan (a preliminary agenda for the respective Board meeting) for the upcoming/current year.</p>
<p>4.3. The members of the collegial body should be informed in advance of the convening of the meeting in order to allow sufficient time for adequate preparation of the issues to be discussed at the meeting and for the discussion leading to the adoption of decisions. The members of the collegial body should be provided with all relevant material relating to the agenda of the meeting together with the notice of the meeting. The agenda should not be amended or supplemented during a meeting unless all members of the collegial body are present and agree to such amendment or supplementation or unless there is an urgent need to deal with important matters of the company.</p>	<p>Yes</p>	<p>The work of the Board is guided by the Rules of Procedure of the Board, governing the convening of meetings, the information of the Board members, the submission of material and other procedural issues.</p> <p>According to the Board’s Rules of Procedure, the material must be submitted to the Board five working days before the regular meeting.</p> <p>The Board follows the recommendation to amend the agenda.</p>
<p>4.4. In order to coordinate the work of the company’s collegial bodies and to ensure an efficient decision-making process, the chairpersons of the company’s collegial supervisory and management bodies should coordinate the dates and agendas of the meetings to be convened and should cooperate closely on other issues related to the company’s management. Meetings of the company’s Supervisory Council should be open to the members of the company’s Board, in particular where the meeting deals with matters relating to the removal of members of the Board, their liability and the determination of remuneration.</p>	<p>Not applicable</p>	<p>The Supervisory Council is not formed at the Company.</p>

<p>5 Principle: Nomination, Remuneration and Audit Committees</p>		
<p>5.1. Purpose and composition of committees</p>		
<p>The committees established within the company should enhance the effectiveness of the Supervisory Council and, if the Supervisory Council is not established, of the Board, which performs supervisory functions, by ensuring that decisions are taken after due deliberation and by helping to organise the work in such a way as to ensure that decisions are not affected by material conflicts of interest.</p>		
<p>The Committees should act independently and in a principled manner and make recommendations related to the decision of the collegial body, but the final decision is taken by the collegial body itself.</p>		
<p>5.1.1. Depending on the specific circumstances of the company and the governance structure chosen, the company’s Supervisory Council and, if the Supervisory Council not established, the Board, which performs the supervisory functions, form committees. It is recommended that the collegial body form Nomination, Remuneration and Audit committees⁷.</p>	<p>Yes</p>	<p>The Company has the Remuneration and Nomination Committee at the Group level, which is formed by the Board of EPSO-G UAB and acts in accordance with the regulations approved by the body that forms it, and the Audit Committee at the Group level, which is formed by the sole shareholder EPSO-G UAB and acts in accordance with the regulations approved by the body that forms it.</p>
<p>5.1.2. Companies may decide to have fewer than three committees. In this case, companies should provide an explanation as to why they have chosen the alternative approach and how the chosen approach meets the objectives set by the three separate Committees.</p>	<p>Yes</p>	<p>Given the close links between remuneration and nomination issues and the need for experts with the same qualifications, it has been decided to form a single Remuneration and Nomination Committee.</p>

⁷ The legal acts may provide for the obligation to form a respective committee. For example, the Law on the Audit of Financial Statements of the Republic of Lithuania provides that public-interest entities (including but not limited to public limited liability companies whose securities are traded on a regulated market of the Republic of Lithuania and/or of any other Member State) are under the obligation to set up an audit committee (the legal acts provide for the exemptions where the functions of the audit committee may be carried out by the collegial body performing the supervisory functions).

<p>5.1.3. The functions assigned to the committees formed in companies may be performed by the collegial body itself in the cases provided for by law. In such a case, the provisions of this Code relating to committees (in particular as regards their role, functioning and transparency) should, where appropriate, apply to the collegiate body as a whole.</p>	<p>Not applicable</p>	<p>Please see par. 5.1.1.</p>
<p>5.1.4. Committees established by the collegial body should normally be composed of at least three members. Subject to the requirements of the legal acts, committees could be comprised only of two members as well. Members of each committee should be selected on the basis of their competences by giving priority to independent members of the collegial body. The chair of the management board should not serve as the chair of committees.</p>	<p>Yes</p>	<p>Paragraphs 7.8 and 7.9 of the Articles of Association of EPSO-G UAB regulate the formation of committees at the EPSO-G Group level and the areas of their competence.</p> <p>The aforementioned statutes state that the Remuneration and Nomination and Audit Committees shall consist of at least three members.</p> <p>It is ensured that from among three members there is at least one independent member in the Remuneration and Nomination Committee, and more than half of the members in the Audit Committee.</p> <p>Not all members of the Remuneration and Nomination Committee and the Audit Committee are appointed from the Board of EPSO-G. One member to each of the committees is appointed on the basis of competence when performing the external selection of an independent member of the committee.</p>
<p>5.1.5. The authority of each committee formed should be determined by the collegial body itself. Committees should perform their duties according to the authority delegated to them and regularly report to the collegial body on their activities and performance on a regular basis. The Rules of Procedure of each committee, defining its role and specifying its rights and duties, should be published at least once a year (as part of the information that the company publishes annually about its governance structure and practices).</p> <p>Companies should also publish each year in their annual report, without prejudice to the requirements of the legislation on the processing of personal data, the composition, number of meetings and attendance of members of the existing committees during the previous year, as well as the main operational goals and their performance.</p>	<p>Yes</p>	<p>The authority of the committees is determined in the Articles of Association of EPSO-G UAB and under the decision of the body forming the committee – the Regulations of the Remuneration and Nomination Committee are approved by the decision of the Board of EPSO-G UAB, and the Regulations of the Audit Committee are approved by the decision of the sole shareholder EPSO-G UAB, as it is permitted by the Requirements for Members of the Audit Committee approved by the Bank of Lithuania (Article 10).</p> <p>The Regulations of the Committees are available on EPSO-G UAB website. Information about the composition, activities of the committees and other information is presented in the consolidated Group’s annual report.</p>
<p>5.1.6. In order to ensure the independence and objectivity of committees, members of the collegial body who are not members of the committee should normally be entitled to attend committee meetings only at the invitation of the committee. The Committee may invite or require the attendance of certain employees or experts of the Company. The Chair of each committee should be able to communicate directly with shareholders. The cases in which this should be done should be specified in the rules governing the operation of the Committee.</p>	<p>Yes</p>	<p>The Regulations of the Committees provide for the right of the members of the Committees to invite, at their discretion, to their meetings the members of the bodies of the companies of the EPSO-G UAB group of companies, employees, representatives, candidates for certain positions or other persons and to obtain from them the necessary explanations within their competence as well as require for that purpose that necessary actions would be carried out needed for the performance of the functions of the Committees.</p>
<p>5.2. Nomination committee.</p>		
<p>5.2.1. The key functions of the nomination committee should be the following:</p> <p>(1) to select candidates to fill vacancies in the membership of supervisory and management bodies and the administration and recommend the collegial body to approve them. The Nomination Committee should assess the balance of skills, knowledge and experience in the governing body, develop a description of the functions and skills required for the specific position and assess the time required to complete the assignment;</p> <p>(2) to assess, on a regular basis, the structure, size and composition of the supervisory and management bodies as well as the skills, knowledge and activity of its members, and provide the collegial body with recommendations on how the required changes should be sought;</p> <p>(3) to devote the attention necessary to ensure succession planning.</p>	<p>Yes</p>	<p>The Remuneration and Nomination Committee of EPSO-G UAB serves as the advisory body to the Board of EPSO-G UAB and to the Company’s Board. The main functions of the Committee are as follows:</p> <p>assistance in the selection of candidates to members of the bodies in all the group companies;</p> <p>provision of recommendations for the group companies on appointment of members to the management bodies, conclusion of contracts with them and determination of remuneration for them;</p> <p>provision of recommendations on the policies of the group companies that govern the remuneration policy and employee performance assessment;</p> <p>provision of recommendations on the system of succession of critical positions;</p> <p>makes recommendations on the system of equal opportunities, inclusion and diversity promotion within the Group;</p> <p>etc.</p>

<p>5.2.2.The Company’s CEO should be consulted on matters relating to members of the collegial body who have an employment relationship with the company and to the Senior Management, with the right to make proposals to the Nomination Committee.</p>	<p>Yes</p>	<p>The Regulations establish that the right of initiative to convene the Remuneration and Nomination Committee is exercised by the boards or CEOs of the Group of companies that also propose the agenda of the meeting by submitting issue-related materials and draft resolutions.</p> <p>Currently, the Company’s Board has no members who have employment relations with the Company.</p>
<p>5.3.Remuneration Committee.</p>		
<p>The main functions of the Remuneration Committee should be: submit to the collegial body proposals on the remuneration policy applied to members of the supervisory and management bodies and the heads of the administration for approval. Such policies should cover all forms of remuneration, including fixed remuneration, performance-related remuneration, financial incentive schemes, pension schemes, severance payments, as well as conditions that would allow the company to recover amounts or suspend payments, indicating the circumstances that would make it appropriate; submit to the collegial body proposals regarding individual remuneration for members of the collegial bodies and the heads of the administration in order to ensure that they would be consistent with the company's remuneration policy and the evaluation of the performance of the persons concerned; review, on a regular basis, the remuneration policy and its implementation.</p>	<p>Yes</p>	<p>The Company has a single Remuneration and Nomination Committee, with functions described in detail in point 5.2.1.</p>
<p>5.4.Audit Committee.</p>		
<p>5.4.1.The key functions of the audit committee are defined in the legal acts regulating the activities of the audit committee⁸.</p>	<p>Yes</p>	<p>The Audit Committee of EPSO-G UAB serves as the advisory body to the Board of EPSO-G UAB and to the Company’s Board. The main functions of the Committee are as follows: supervision of the preparation of the financial statements of the companies of the Group and performance of their audit; ensuring compliance with the principles of independence and objectivity by the auditors and audit firms of the companies of the Group; oversight of the effectiveness of the Group companies’ internal control, risk management and internal audit systems and business processes; responsibility for control over provision of non-audit services by the auditor and/or audit firm of the Group companies; ensuring the functioning of the complaints system and complaints handling; evaluation of transactions with related parties.</p>
<p>5.4.2.All members of the committee should be provided with detailed information on specific issues of the company’s accounting system, finances and operations. The Audit Committee should be informed by the company’s executives of the accounting treatment of significant and unusual transactions, which may be accounted for in different ways.</p>		<p>Please see par. 5.4.1.</p>
<p>5.4.3.The Audit Committee should decide whether the participation of the chair of the management board, CEO of the Company, the chief finance officer (or senior employees responsible for finance and accounting), the internal and external auditors in its meetings is required</p>	<p>Yes</p>	<p>The Regulations of the Audit Committee stipulate that the members of the Committee, at their own discretion, may invite to their meetings the members of the bodies of the companies of the group, their employees, representatives, candidates for</p>

⁸ For the purposes of this Code, heads of the administration are the employees of the company who hold top level management positions.

For the purposes of this Code, the criteria of independence of members of the supervisory council are interpreted as the criteria of unrelated parties defined in Article 31(7) and (8) of the Law on Companies of the Republic of Lithuania.

Issues related to the activities of audit committees are regulated by Regulation No 537/2014 of the European Parliament and the Council of 16 April 2014 on specific requirements regarding statutory audit of public-interest entities, the Law on the Audit of Financial Statements of the Republic of Lithuania, and the Rules Regulating the Activities of Audit Committees approved by the Bank of Lithuania.

<p>(and, if required, when). The Committee should be able to meet the persons concerned, if necessary, without the presence of members of the management bodies.</p>		<p>certain positions or other persons, and obtain from them the necessary explanations within their competence, as well as require for that purpose that necessary actions would be taken for the performance of the functions of the Committee.</p>
<p>5.4.4.The Audit Committee should be informed about the internal auditor’s work programme and should be furnished with internal audit reports or periodic summaries. The Audit Committee should also be informed of the work programme of the external auditors and should receive a report from the audit firm describing any relationship between the independent audit company and the company and its group.</p>	<p>Yes</p>	<p>Please see par. 5.4.3.</p> <p>The Audit Committee is regularly, at least quarterly, informed about the internal audit reports and at least once every six months, with the internal audit plan and it may provide recommendations with regard to them to the boards of the companies of the EPSO-G Group. The Audit Committee organises meetings with the external auditors to discuss the auditors’ work programme and uncertainties arising during the audit, and after the performance of the external audit, their conclusions and recommendations are discussed with the external auditors. Each year, before the start of annual audits, the audit firm submits its declaration of independence to the Audit Committee and to the companies.</p>
<p>5.4.5.The Audit Committee should examine whether the company complies with the applicable provisions regulating the possibility of lodging a complaint or reporting anonymously his/her suspicions of potential violations committed at the company and should also ensure that there is a procedure in place for proportionate and independent investigation of such issues and appropriate follow-up actions.</p>	<p>Yes</p>	<p>The Regulations of the Audit Committee stipulate that the Audit Committee ensures the effective functioning of the complaints system and the proportionate and independent investigation of submitted complaints. In the implementation of this function, the Chairperson of the Audit Committee is immediately informed about significant complaints received. In addition, the Audit Committee is regularly reported on all complaints received by the companies of the EPSO-G Group, their investigation and decisions made on the basis of the findings of investigations carried out.</p>
<p>5.4.6.The Audit Committee should submit to the supervisory board or, where the supervisory board is not formed, to the management board its activity report at least once in every six months, at the time that annual and half-yearly reports are approved.</p>	<p>Yes</p>	<p>The Regulations of the Audit Committee stipulate that the Audit Committee submits quarterly activity reports to the Board.</p> <p>In addition, it submit a consolidated activity report to the Ordinary General Meeting of Shareholders and to the Board of EPSO-G UAB.</p>
<p>6 Principle: Avoidance and disclosure of conflicts of interest</p> <p>The corporate governance framework should encourage members of the company’s supervisory and management bodies to avoid conflicts of interest and ensure a transparent and effective mechanism of disclosure of conflicts of interest related to members of the supervisory and management bodies. The corporate governance system should recognise the rights of stakeholders as established by law and promote active cooperation between the company and stakeholders to create wealth, jobs and financial stability. In the context of this principle, stakeholders include investors, employees, creditors, suppliers, customers, the local community and others with an interest in the company.</p>		
<p>A member of a company’s supervisory and management body should avoid a situation where his or her personal interests conflict or may conflict with the interests of the company. If such a situation does arise, a member of the supervisory or management body of the company should, within a reasonable period of time, inform the other members of the same body, or the body of the company that elected him or her, or the shareholders of the company of the existence of such a conflict of interests, indicating the nature of the interests and, where possible, the value.</p>	<p>Yes</p>	<p>This obligation is set out in paragraphs 56-57 of the Company’s Articles of Association, the Regulations of the management bodies, and the Policy of Management of Interests of Members of Collegial Bodies, Executives and Employees of EPSO-G Group.</p> <p>Article 30 of the Company’s Articles of Association stipulates that upon emergence of new circumstances, which may lead to a conflict of interests of a member of the Board, the member of the Board must notify the Board and the Company of such new circumstances without any undue delay.</p>
<p>7 Principle: Company’s remuneration policy</p> <p>The company’s remuneration policy and the procedures for its review and disclosure should prevent potential conflicts of interest and abuse in determining the remuneration of the members of the collegiate bodies and of the executives, and ensure the openness and transparency of the company’s remuneration policy, as well as the company’s long-term strategy.</p>		
<p>7.1.The company should approve and post the remuneration policy on the website of the company; such policy should be reviewed on a regular basis and be consistent with the company’s long-term strategy.</p>	<p>Yes</p>	<p>The Company applies the Guidelines for Determining the Remuneration for Service at the Bodies of EPSO-G UAB and EPSO-G UAB Group Companies, which are approved by the sole shareholder EPSO-G UAB and are available to public.</p> <p>The Company applies in full EPSO-G Group’s Remuneration, Performance Appraisal and Training Policy. The Remuneration Policy is available to the public.</p>

<p>7.2.The remuneration policy should include all forms of remuneration, including the fixed-rate remuneration, performance-based remuneration, financial incentive schemes, pension arrangements and termination payments as well as the conditions specifying the cases where the company can recover the disbursed amounts or suspend the payments.</p>	<p>Yes</p>	<p>All possible forms of remuneration for collegiate bodies and employees are set out in the Guidelines for determining remuneration for activities in the corporate bodies of EPSO-G UAB and EPSO-G Group and in the Remuneration, Performance Assessment and Development Policy of the EPSO-G Group. Both documents are made public.</p>
<p>7.3.With a view to avoid potential conflicts of interest, the remuneration policy should provide that members of the collegial bodies which perform the supervisory functions should not receive remuneration based on the company's performance.</p>	<p>Yes</p>	<p>The Company applies the Guidelines for Determining the Remuneration for Service at the Bodies of EPSO-G UAB and the EPSO-G Group Companies, which define a fixed remuneration for independent members of the collegial bodies. The members of the Board do not receive remuneration (bonuses) based on the Company's performance.</p>
<p>7.4.The remuneration policy should provide sufficient information on the policy regarding termination payments. Termination payments should not exceed a fixed amount or a fixed number of annual salaries and should generally not exceed a fraction of two years' fixed remuneration or its equivalent. Termination payments should not be paid if the contract is terminated because of poor performance.</p>	<p>No</p>	<p>The Remuneration, Performance Appraisal and Training Policy of the EPSO-G Group stipulates that the Group companies do not enter into advance agreements on the amounts of termination benefits (except for the heads of the companies whose terms of employment are determined by the Board). The amounts of termination benefits are determined by taking into account the mandatory minimum amounts of such benefits established by the provisions of labour law, except for exceptional cases when there are objective reasons for the agreement on higher amounts of benefits. The Board of the company shall be informed about the payment of such benefits and the grounds for their payment during the upcoming meeting</p>
<p>7.5.In the event that the financial incentive scheme is applied at the company, the remuneration policy should contain sufficient information about the retention of shares after the award thereof. In the case of a share-based award, the shares should not vest for at least three years after the award. After vesting, members of the collegiate bodies and executives should retain a certain number of shares until the end of their term of office, depending on the need to cover any costs associated with the acquisition of shares.</p>	<p>Not applicable</p>	<p>No such schemes are applied at the Company.</p>
<p>7.6.The Company should publish information about the implementation of the remuneration policy on its website, with a key focus on the remuneration policy in respect of the collegial bodies and managers in the next and, where relevant, subsequent financial years. It should also provide an overview of how the remuneration policy was implemented in the previous financial year. This type of information should not contain information of commercial value. Particular attention should be paid to significant changes in the company's remuneration policy compared to the previous financial year.</p>	<p>Yes</p>	<p>General information on the implementation of the Remuneration Policy and average salary levels by each category of employees are disclosed to public in the Company's annual report.</p> <p>According to Article 25(5) of the Law on Energy of the Republic of Lithuania, the Company discloses remuneration of the members of the Company's management bodies, and other benefits related to the functions of the members of the management bodies.</p> <p>Information on employee remuneration is made available to public on a quarterly basis on the Company's website.</p>
<p>7.7.It is recommended that the remuneration policy or any major change of the policy should be included on the agenda of the general meeting of shareholders.</p> <p>Schemes where members of the collegial body and employees are remunerated in shares or share options should be approved by the General Meeting of Shareholders.</p>	<p>Yes</p> <p>Not applicable</p>	<p>The remuneration of the members of the Company's Board is determined by the General Meeting of Shareholders of the Company. When determining the remuneration, the Company follows the Guidelines for Determining the Remuneration for Service at the Bodies of EPSO-G UAB and the EPSO-G Group Companies, which are approved by the sole shareholder EPSO-G UAB.</p> <p>Such schemes are not applied at the Company.</p>

8 Principle: Role of stakeholders in corporate governance

The corporate governance framework should recognise the rights of stakeholders entrenched in the laws or mutual agreements and encourage active cooperation between the company and stakeholders in creating the company value, jobs and financial sustainability. In the context of this principle, stakeholders include investors, employees, creditors, suppliers, customers, the local community and others with an interest in the company.

<p>8.1.The corporate governance framework should ensure that the rights and lawful interests of stakeholders are protected.</p>	<p>Yes</p>	<p>The Company has adopted the Transparency and Communication Policy of the EPSO-G Group of Companies, which establishes goals to increase awareness and understanding of stakeholders about the activities of the EPSO-G Group of companies and individual group companies; to ensure employee engagement; to create and maintain sustainable relationship with stakeholders based on mutual respect.</p>
<p>8.2.The corporate governance framework should create conditions for stakeholders to participate in corporate governance in the manner prescribed by law. Examples of participation by stakeholders in corporate governance include the participation of employees or their representatives in the adoption of decisions that are important for the company, consultations with employees or their representatives on corporate governance and other important matters, participation of employees in the company’s authorised capital, involvement of creditors in corporate governance in the cases of the company’s insolvency, etc.</p>	<p>Yes</p>	<p>The Company, together with the representatives of the Company’s employees, conducts consultations, negotiations and briefings on the processes for improving efficiency of the Company’s operations.</p> <p>Stakeholders can take part in the corporate governance to the extent permitted by law.</p>
<p>8.3.Where stakeholders participate in the corporate governance process, they should have access to relevant information.</p>	<p>Yes</p>	<p>The stakeholders are provided with the conditions to familiarise themselves with the required information.</p>
<p>8.4.Stakeholders should be provided with the possibility of reporting confidentially any illegal or unethical practices to the collegial body performing the supervisory function.</p>	<p>Yes</p>	<p>The Company’s Trust Line contacts are available to public on the Company’s official website. The contacts can be used by the stakeholders to report any incidents of violation of environmental, occupational health and safety requirements, unethical or inappropriate work practices, violation of anti-corruption requirements. The stakeholders are introduced to the possibility to contact directly the head of the Company or the chairperson of the Board.</p> <p>The Audit Committee operating at the level of the EPSO-G Group of companies ensures the functioning of the system of lodging complaints and their handling.</p>

9 Principle: Disclosure of information
 The corporate governance framework should ensure that timely and accurate disclosures are made on all material matters concerning the company, including its financial position, performance and corporate governance.

<p>9.1.Without prejudice to the Company’s procedures for confidential information and trade secrets, as well as to the requirements of the legislation governing the processing of personal data, the Company’s public disclosures should include, but not be limited to:</p>	<p>Yes</p>	<p>The Company applies the Transparency and Communication Policy of the EPSO-G Group, based on which the essential financial and non-financial information is disclosed to public in the Company’s interim and annual report and on the Company’s official website.</p>
<p>9.2.the company’s performance and financial results;</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company’s interim and annual report and on the Company’s official website.</p>
<p>9.3.the company’s business objectives and non-financial information;</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company’s interim and annual report and on the Company’s official website.</p>
<p>9.4.the persons owning or controlling a shareholding in the company, directly and/or indirectly and/or jointly with associated persons, as well as the structure of the group of companies and the interrelationships between them, with an indication of the ultimate beneficial owner;</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company’s interim and annual reports and on the Company’s and/or the Group companies’ website.</p>
<p>9.5.the members of the Company’s supervisory and management bodies, which of them are considered independent, the Company’s CEO, their shareholdings or votes in the Company, and their involvement in the management of other companies, their competence and remuneration;</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company’s interim and annual report and on the Company’s official website.</p>

<p>9.6. reports from existing committees on their composition, number of meetings and attendance of members during the previous year, as well as on their main activities and results;</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company's interim and annual reports and on the Company's and/or the Group companies' website.</p>
<p>9.7. the potential key risk factors, the company's risk management and supervision policy;</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company's interim and annual report and on the Company's official website.</p>
<p>9.8. the company's transactions with related parties;</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company's interim and annual report and on the Company's official website.</p>
<p>9.9. key issues relating to employees and other stakeholders (e.g. human resources policies, employee participation in the management of the company, incentives in the form of shares or share options, relations with creditors, suppliers, the local community, etc.);</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company's interim and annual report and on the Company's official website.</p>
<p>9.10. the company's governance structure and strategy;</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company's interim and annual report and on the Company's official website.</p>
<p>9.11. Initiatives and measures of social responsibility policy and anti-corruption fight, significant current or planned investment projects. This list is deemed minimum and companies are encouraged not to restrict themselves to the disclosure of information included into this list. This principle of the Code does not relieve a company of its obligation to disclose information as required by law.</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company's interim and annual report and on the Company's official website.</p>
<p>9.12. When disclosing the information specified in Item 9.1.1 of recommendation 9.1, it is recommended that the company which is a parent company in respect of other companies should disclose information about the consolidated results of the whole group of companies.</p>	<p>Yes</p>	<p>EPSO-G UAB, as a parent company, discloses consolidated information in the consolidated annual report.</p>
<p>9.13. When disclosing the information specified in Item 9.1.4 of recommendation 9.1, it is recommended that the information on the professional experience and qualifications of members of the Company's supervisory and management bodies and the manager of the company as well as potential conflicts of interest which could affect their decisions should be provided. It is further recommended that the remuneration or other income of members of the company's supervisory and management bodies and CEO of the company should be disclosed, as provided for in greater detail in Principle 7.</p>	<p>Yes</p>	<p>Information is disclosed to public in the Company's interim and annual report and on the Company's official website.</p>
<p>9.14. Information should be disclosed in such manner that no shareholders or investors are discriminated in terms of the method of receipt and scope of information. Information should be disclosed to all parties concerned at the same time.</p>	<p>Yes</p>	<p>The Company discloses the information via the information disclosure system used by the NASDAQ Vilnius stock exchange in the Lithuanian and English languages simultaneously. The Company discloses information prior to or after a trading session at NASDAQ Vilnius Stock Exchange and presents it simultaneously to all the markets in which the Company's stock is traded. The Company does not disclose information that may affect the price of its stock in any comments, interviews or by any other means until such information is provided through the information disclosure system of the stock exchange.</p>
<p>10 Principle: Selection of the Company's audit firm The Company's audit firm selection mechanism should ensure the independence of the report and opinion of the audit firm.</p>		
<p>10.1. With a view to obtain an objective opinion on the company's financial position and financial performance results, the company's annual financial statements and the financial information provided in its annual report should be audited by an independent audit firm.</p>	<p>Yes</p>	<p>The Company's financial information is audited by an independent audit firm. The independent auditor is appointed by the General Meeting of Shareholders.</p>

<p>10.2.It is recommended that the audit firm would be proposed to the general meeting of shareholders by the supervisory board or, if the supervisory board is not formed at the company, by the management board of the company.</p>	<p>Yes</p>	<p>The Audit Committee operating at the Group level takes part in the selection process of an auditor, by recommending a candidate for the independent auditor to the Company's Board. As the Board assesses the candidate proposed by the Audit Committee, it proposes the candidate for the approval by the General Meeting of Shareholders.</p>
<p>10.3.In the event that the audit firm has received remuneration from the company for the non-audit services provided, the company should disclose this publicly. This information should also be available to the Supervisory Council or, if the Supervisory Council is not formed at the company, by the management board of the company when considering which audit firm should be proposed to the general meeting of shareholders.</p>	<p>Yes</p>	<p>The fee for non-audit services received by the audit firm is made available to public by the Company. The non-audit services provided by the audit company shall be in accordance with the policy approved by the Audit Committee of EPSO-G Group on the purchase of non-audit services from the audit company or from any network to which the audit company belongs.</p> <p>The provision of non-audit services is supervised by the Audit Committee operating at the Group level, which has all the necessary information about the auditor to provide recommends to the Board on a candidate for the independent auditor.</p>

Annex 3

Information on compliance with transparency guidelines

EPSO-G UAB and its subsidiaries comply with Resolution No 1052 of the Government of 14 July 2010 On the Approval of the Description of the Guidelines for Ensuring the Transparency of the Activities of State-Owned Enterprises (hereinafter the "Transparency Guidelines"). The application of the Transparency Guidelines is mandatory to EPSO-G as it is a state-owned enterprise (hereinafter the "SOE"). In order to ensure compliance with the Transparency Guidelines across EPSO-G Group, the Business Transparency and Communication Policy of the EPSO-G Group was approved at the Group level, which considers in detail the requirements set forth in the Transparency Guidelines, and defines their applicability to the EPSO-G Group companies. Implementation of the Transparency Guidelines is largely ensured by Amber Grid AB through disclosure of information in the annual report and on the official website of Amber Grid, where information is disclosed in the format that is acceptable and comprehensible to the stakeholders.

Article 3 of the Transparency Guidelines stipulates that SOE complies with the provisions of the Corporate Governance Code for the Companies Listed on Nasdaq Vilnius AB that are related to public disclosure of information. Information on how Amber Grid complies with the provisions of the Code is provided in Annex to Amber Grid's Annual Report - Amber Grid Notice of Compliance with the Corporate Governance Code for the Companies Listed on Nasdaq Vilnius AB.

Below is structured information on the implementation of the Transparency Guidelines:

The following information must be published/other requirements must be implemented on Amber Grid's website (www.ambergrid.lt):

Company name, company code and the register in which the data on the Company is collected and stored, registered office	Implemented
Legal form, in case Amber Grid is restructured, reorganised (the way of reorganisation is to be indicated), under liquidation, in the process of bankruptcy or bankrupt	Not applicable
Information on the authority representing the State, i.e. the Ministry of Energy, and link to its official website	Implemented
Operational objectives, vision and mission	Implemented
Structure	Implemented
CEO's details*	Implemented
Data on the chair and members of the Board*	Implemented
Details of the chair and members of the Supervisory Council*	Not applicable
Names of committees, their chairs and members*	Not applicable
*The following details are published: name, surname, date of commencement of duties, other management positions held in other legal entities, education, qualifications, professional experience; whether the member of the collegial body is elected or appointed as an independent member.	
Total amount of the nominal values of the shares owned by the State (to the nearest euro cent) and the percentage of Amber Grid's issued capital	Implemented

Implementation of special obligations established under the recommendations approved by the Minister of Economy and Innovations of the Republic of Lithuania: the purpose of special obligations, budget allocations in the current calendar year for fulfilment of special obligations, and the legal acts under which the SOE is assigned to fulfil special obligation, the terms for fulfilment of special obligation and/or the regulated pricing	Implemented
Information on corporate social responsibility initiatives and measures, major investment projects underway or planned	Implemented
If Amber Grid is a member of other legal entities (not applicable to subsidiaries and second-tier subsidiaries), the name, code, and register in which data on the Company is compiled and stored, registered address, and official websites of such legal entities	Not applicable
A set of Amber Grid's annual financial statements, Amber Grid's annual report, as well as an auditor's report on Amber Grid's annual financial statements must be published on Amber Grid's website within 10 working days from the date of approval of the set of annual financial statements	Implemented
The sets of Amber Grid's interim financial statements and Amber Grid's interim reports must be published on website not later than within 2 months after the end of the reporting period	Implemented
The following documents must be provided/other requirements must be implemented on Amber Grid's website (www.ambergrid.lt):	
Amber Grid's Articles of Association	Implemented
Official Letter of the Ministry of Energy on determining the State's goals and expectations for Amber Grid	Not applicable
The business strategy or a summary thereof where the business strategy contains confidential information or information considered to be a commercial/industrial secret	Implemented
Remuneration policy that covers determination of remuneration for CEO and members of collegial bodies and committees of Amber Grid	Implemented
Amber Grid annual and interim reports	Implemented
Sets of annual and interim financial statements for a period of at least five years and auditor's reports on the annual financial statements	Implemented
The above documents are published in PDF format and are technically printable	Implemented
Other requirements must be met/published in the financial statements and reports:	
Amber Grid keeps its accounting records in a way that ensures preparation of the financial statements in accordance with the International Accounting Standards	Implemented
Amber Grid prepares a set of financial statements for the period of 6 months.	Implemented
In addition to annual report, Amber Grid prepares an interim report for the period 6 months.	Implemented
In addition to the content requirements set forth in the Law on Financial Reporting by Undertakings of the Republic of Lithuania, the following information must be disclosed by Amber Grid :	
Brief description of Amber Grid's business model	Implemented
Information on significant events occurring during the financial year and after the end of the financial year (until the date of preparation of annual report) that had material impact on the activities of Amber Grid	Implemented
Results for the objectives set out in the Operational Strategy	Implemented
Profitability, liquidity, asset turnover, debt ratios	Implemented
Compliance with specific obligations	Implemented
Implementation of the investment policy, ongoing and planned investment projects and investments during the year	Implemented
Implementation of the risk management policy applied by Amber Grid	Implemented
Implementation of the dividend policy	Implemented
Implementation of the remuneration policy	Implemented
Total annual salary bill, average monthly salary by position and/or department	Implemented
It is recommended that SOEs that are not required to prepare a corporate social responsibility, include information on environmental, social and human resources, human rights, anti-corruption and anti-bribery issues in their annual report or annual activity report, as appropriate	Implemented

<p>The consolidated annual report shall include the structure of the group, the name, code and register number of each subsidiary company in which data on the Company are collected and stored, the registered office (address), the percentage of shares held in the subsidiary company's issued capital, and the financial and non-financial performance of the financial year</p>	Not applicable
<p>The interim report of Amber Grid includes the following information: a brief description of Amber Grid's business model, analysis of financial performance during the reporting period, information on significant events occurring during the reporting period, profitability, liquidity, asset turnover and debt ratios and changes therein compared to the respective period in the previous year</p>	Implemented

FINANCIAL STATEMENTS

Prepared for the year ended 31 December 2025 in accordance with International Financial Reporting Standards as adopted by the European Union



Statement of Financial Position

Statement of Comprehensive Income

Statement of Changes in Equity

Statement of Cash Flows

Notes to the Financial Statements

Statement of Financial Position

Statement of Comprehensive Income

Statement of Changes in Equity

Statement of Cash Flows

Notes to the Financial Statements

Statement of financial position

(All amounts are in EUR '000 unless otherwise stated)

	Notes	As at 31 December 2025	As at 31 December 2024 (reclassified)	As at 1 January 2024 (reclassified)
ASSETS				
Non-current assets				
Intangible assets	6	3,106	2,210	2,559
Property, plant and equipment	7	283,924	276,754	284,353
Right-of-use assets	8	3,304	4,281	3,100
Investments in associates and joint ventures	31	-	3,560	3,644
Deferred tax asset	33	4,479	3,931	4,086
Other financial assets at amortised cost		-	-	-
Derivative assets at FVTPL	31	-	1,153	1,226
Other non-financial assets		64	-	-
Total non-current assets		294,877	291,889	298,968
Current assets				
Inventories	9	4,125	4,761	4,874
Contract assets	10	3,663	1,220	1,798
Trade receivables	11	10,196	9,763	9,030
Other financial assets at amortised cost	12	836	6,820	1,030
Other non-financial assets	13	9,072	12,712	17,568
Prepaid income tax		28	-	-
Cash and cash equivalents	14	1,942	31	121
Total current assets		29,862	35,307	34,421
Total assets		324,739	327,196	333,389
EQUITY AND LIABILITIES				
Equity				
Issued capital	15	51,731	51,731	51,731
Legal reserve	17	5,173	5,173	5,173
Other reserves	17	500	403	114,430
Revaluation reserve	17	2,247	2,479	2,767
Retained earnings		106,625	115,842	13,425
Total equity		166,276	175,628	187,526
Non-current liabilities				
Borrowings from credit institutions	19	-	55,312	60,962
Borrowings from group companies	19	50,000	-	-
Lease liabilities	20	2,485	3,492	2,933
Contract liabilities		2,311	1,700	1,530
Provisions	22	707	937	667
Total non-current liabilities		55,503	61,441	66,092
Current liabilities				
Borrowings	19	55,475	5,919	5,988
Borrowings from group companies	19	18,191	23,563	25,096
Lease liabilities	20	1,015	986	317
Trade payables	23	5,076	6,367	5,317
Other financial liabilities at amortised cost	24	2,855	29,300	28,820
Provisions	22	6,160	5,971	463
Income tax liability		317	1,071	-
Derivative liability at FVTPL	31	-	654	364
Other non-financial liabilities	25	13,871	16,296	13,406
Total current liabilities		102,960	90,127	79,771
Total equity and liabilities		324,739	327,196	333,389

The accompanying notes form an integral part of these financial statements.

Statement of comprehensive income

(All amounts are in EUR '000 unless otherwise stated)

	Notes	2025	2024
Revenue	26	69,578	74,310
Other income	27	138	273
		69,716	74,583
Purchases of natural gas and related services	28	(14,600)	(16,079)
Impact of the changes in gas inventory balances	28	(452)	(430)
Wages and salaries, and related expenses	29	(17,290)	(15,501)
Purchases of repair and maintenance services		(3,525)	(2,612)
Other expenses	30	(16,530)	(13,441)
		(52,397)	(48,063)
EBITDA		17,319	26,520
Depreciation and amortisation	6,7,8	(14,669)	(14,932)
Loss on impairment and write-off of property, plant and equipment		(23)	(43)
Other gain (loss), net	31	178	(364)
Operating profit (EBIT)		2,805	11,181
Finance income		178	186
Finance costs		(2,242)	(2,345)
Total finance costs, net	32	(2,064)	(2,159)
Share of results of associates	31	424	480
Profit before tax		1,165	9,502
Income tax			
Current year income tax expense		(380)	(1,071)
Deferred income tax benefit (expense)		575	(125)
Total income tax	33	195	(1,196)
Net profit		1,360	8,306
Other comprehensive income			
Items that will not be reclassified to profit or loss			
Deferred tax (expenses)	17	(27)	(30)
Total other comprehensive income		(27)	(30)
Total comprehensive income for the period		1,333	8,276
Basic and diluted earnings per share (EUR)	34	0.01	0.05

The accompanying notes form an integral part of these financial statements.

Statement of changes in equity

(All amounts are in EUR '000 unless otherwise stated)

	Notes	Issued capital	Legal reserve	Other reserves	Revaluation reserve	Retained earnings	Total
Balance as at 31 December 2023		51,731	5,173	114,430	2,767	13,425	187,526
Depreciation of revaluation reserve and write-offs	17	-	-	-	(258)	258	-
Transfers to/from reserves	17	-	-	(114,027)	-	114,027	-
Dividends	16	-	-	-	-	(20,174)	(20,174)
Total transactions with owners		-	-	(114,027)	(258)	94,111	(20,174)
<i>Net profit for the year</i>		-	-	-	-	8,306	8,306
Other comprehensive income	17	-	-	-	(30)	-	(30)
Total comprehensive income for the period		-	-	-	(30)	8,306	8,276
Balance as at 31 December 2024		51,731	5,173	403	2,479	115,842	175,628
Depreciation of revaluation reserve and write-offs	17	-	-	-	(205)	205	-
Transfers to/from reserves	17	-	-	97	-	(97)	-
Dividends	16	-	-	-	-	(10,685)	(10,685)
Total transactions with owners		-	-	97	(205)	(10,577)	(10,685)
<i>Net profit for the year</i>		-	-	-	-	1,360	1,360
Other comprehensive income	17	-	-	-	(27)	-	(27)
Total comprehensive income for the period		-	-	-	(27)	1,360	1,333
Balance as at 31 December 2025		51,731	5,173	500	2,247	106,625	166,276

The accompanying notes form an integral part of these financial statements.

Statement of cash flows

(All amounts are in EUR '000 unless otherwise stated)

	Notes	2025	2024
I. Cash flows from operating activities			
I.1.		1,360	8,306
Adjustments for non-cash items and other corrections:			
I.2.	6,7,8	14,669	14,932
I.3.		-	-
I.4.		23	41
I.5.		240	(132)
I.6.		(195)	1,196
I.7.		(4)	(4)
I.8.		4	5,834
I.9.		17	-
Elimination of results of financing and investing activities:			
I.10.	31	(178)	364
I.11.	31	(424)	(480)
I.12.	32	2,064	2,159
Changes in working capital:			
I.13.		454	255
I.14.		(420)	(738)
I.15.		995	(1,376)
I.16.		(812)	980
I.17.		(851)	3,259
I.18.		(722)	(2)
I.19.		(1,161)	-
Net cash flows from operating activities		15,059	34,594
II. Cash flows from investing activities			
II.1.		(49,633)	(6,072)
II.2.		1	340
II.3.	18	-	7,192
II.4.	31	3,824	-
II.5.		-	-
II.6.		229	135
II.7.		837	564
II.8.	12	6,708	(6,205)
Net cash flows used in investing activities		(38,034)	(4,046)
III. Cash flows from financing activities			
III.1.		(10,678)	(20,166)
III.2.		50,000	-
III.3.		(5,649)	(5,649)
III.4.		(5,638)	(1,526)
III.5.		(2,160)	(2,415)
III.6.		(989)	(876)
III.7.		-	(6)
Cash flows from/used in financing activities		24,886	(30,638)
IV. Net increase (decrease) in cash and cash equivalents		1,911	(90)
V. Cash and cash equivalents at the beginning of the year		31	121
VI. Cash and cash equivalents at the end of the period		1,942	31

The accompanying notes form an integral part of these financial statements.
(cont'd on the next page)

Notes to the financial statements

(All amounts are in EUR '000 unless otherwise stated)

1. General information

Amber Grid AB (hereinafter the “Company”) is a public limited liability company registered in the Republic of Lithuania. registered office address:

Laisvės ave. 10,
LT – 04215, Vilnius,
Lithuania.

Amber Grid AB was registered on 25 June 2013 as a result of unbundling of natural gas transmission activity (including assets, rights and obligations attributed thereto) from Lietuvos Dujos AB. The Company has been actively operating since 1 August 2013. After obtaining a favourable decision from the European Commission, on 10 April 2015 the National Control Commission for Prices and Energy (the National Energy Regulatory Council (NERC) as from 1 July 2019) granted to the Company an energy operator licence No L2-3 (GDP) to engage in natural gas transmission activities for indefinite term in the territory of Lithuania.

Acting as a natural gas transmission system operator, the Company provides the following services to the system users, other operators and gas market participants:

- natural gas transmission in the territory of Lithuania;
- natural gas flow balancing within the transmission system;
- administration of funds intended to compensate the construction and fixed operating expenses of the liquefied natural gas terminal (hereinafter - “LNGT”), its infrastructure, connector, and the reasonable supply costs of the required quantity of liquefied natural gas incurred by the designated supplier;
- administration of the register of guarantees of origin of gas produced from renewable energy sources.

All the shares of the Company are ordinary registered shares with the nominal value of EUR 0.29 each. As at 31 December 2025 and 31 December 2024, all the shares had been fully paid. The Company had no its own shares. Since 1 August 2013, the Company’s shares have been traded on stock exchange and have been quoted on the Baltic Secondary List of NASDAQ Vilnius. (ISIN – LT0000128696, LEI code 097900BGMP0000061061, ticker AMG1L).

As at 31 December 2025 and 31 December 2024, the Company’s shareholders were as follows:

	Number of shares held	Ownership interest, (%)
EPSO-G UAB (company code 302826889, Laisvės ave. 10, Vilnius)	172.279.125	96.58
Other shareholders	6.103.389	3.42
	178.382.514	100

EPSO-G UAB (hereinafter “EPSO-G”) is a state-owned group of energy transmission and exchange companies (www.epsog.lt). The rights and duties of the sole shareholder of the holding company EPSO-G UAB are exercised by the Ministry of Energy of the Republic of Lithuania (www.enmin.lt).

On 10 October 2025, the Company disposed the remaining shareholding in the associate GET Baltic UAB (hereinafter “GET Baltic”). Until 31 May 2023, GET Baltic was the subsidiary of the Company. On 31 May 2023, upon sale of 66% shares in GET Baltic, the Company lost control in GET Baltic. For more information on the disposal of remaining shareholding in GET Baltic see Note 31.

Information on the shareholding of GET Baltic as at 31 December 2025 and 31 December 2024 is presented below:

Company name	Company’s registered office	Shareholding		Profile of activities
		As at 31 December 2025	As at 31 December 2024	
GET Baltic UAB	Geležinio Vilko st. 18A, LT-08104 Vilnius, the Republic of Lithuania	0%	34%	Licensed activities of natural gas market operator trading natural gas short-term and long-term products.

As at 31 December 2025, the number of employees on payroll at the Company was 368 (31 December 2024: 352).

2. Summary of material accounting policies

The principal accounting policies applied in the preparation of the Company's financial statements for the year ended 31 December 2025 are set out below:

2.1 Basis of preparation

The Company's financial statements for the year ended 31 December 2025 have been prepared in accordance with International Financial Reporting Standards (IFRS), as adopted by the European Union, and are in compliance thereof.

The financial statements have been prepared on a historical cost basis, except for property, plant and equipment which is recorded at revalued amount, less estimated impairment loss, and derivatives accounted for at fair value.

In accordance with the accounting principles of non-current assets of EPSO–G UAB group companies, the non-current assets are accounted at revalued amount less accumulated depreciation and impairment losses, whereas grants are accounted for by reducing the carrying amount of the related asset.

The Company's financial year coincides with the calendar year.

The Company's management approved these financial statements on 24 March 2026. The shareholders of the Company have a statutory right to approve or not to approve these financial statements and require that management prepare a new set of financial statements.

Accounting policies adopted in the preparation of the financial statements are consistent with those of the previous financial year except as follows:

- a. Adoption of new and/or amended IFRSs and interpretations of the International Financial Reporting Interpretations Committee (IFRIC)

In the year ended 31 December 2025, the following IFRSs, amendments and IFRIC interpretations were adopted by the Company:

Amendments to IAS 21: Lack of Exchangeability (issued on 15 August 2023 and effective for annual periods beginning on or after 1 January 2025). Amendments to IAS 21 to help entities assess exchangeability between two currencies and determine the spot exchange rate, when exchangeability is lacking. An entity is impacted by the amendments when it has a transaction or an operation in a foreign currency that is not exchangeable into another currency at a measurement date for a specified purpose. The amendments to IAS 21 do not provide detailed requirements on how to estimate the spot exchange rate. Instead, they set out a framework under which an entity can determine the spot exchange rate at the measurement date. When applying the new requirements, it is not permitted to restate comparative information. It is required to translate the affected amounts at estimated spot exchange rates at the date of initial application, with an adjustment to retained earnings or to the reserve for cumulative translation differences. The amendments had no impact on the Company's financial statements.

- b. The following standards, amendments and interpretations endorsed by the European Union, but have not been early adopted by the Company:

Amendments to the Classification and Measurement of Financial Instruments - Amendments to IFRS 9 and IFRS 7 (issued on 30 May 2024 and effective for annual periods beginning on or after 1 January 2026).

On 30 May 2024, the IASB issued amendments to IFRS 9 and IFRS 7 to:

- (a) clarify the date of recognition and derecognition of some financial assets and liabilities, with a new exception for some financial liabilities settled through an electronic cash transfer system;
- (b) clarify and add further guidance for assessing whether a financial asset meets the solely payments of principal and interest (SPPI) criterion;
- (c) add new disclosures for certain instruments with contractual terms that can change cash flows (such as some instruments with features linked to the achievement of environment, social and governance (ESG) targets); and

(d) update the disclosures for equity instruments designated at fair value through other comprehensive income (FVOCI). Based on the Company's assessment, these amendments will not have significant impact on the financial statements.

Annual Improvements to IFRS Accounting Standards (issued in July 2024, effective for annual reporting periods beginning on or after 1 January 2026). IFRS 1 was clarified that a hedge should be discontinued upon transition to IFRS Accounting Standards if it does not meet the 'qualifying criteria', rather than 'conditions' for hedge accounting. IFRS 7 requires disclosures about a gain or loss on derecognition relating to financial assets in which the entity has a continuing involvement, including whether fair value measurements included 'significant unobservable inputs'. This new phrase replaced reference to 'significant inputs that were not based on observable market data'. IFRS 16 was amended to clarify that when a lessee has determined that a lease liability has been extinguished in accordance with IFRS 9, the lessee is required to apply IFRS 9 guidance to recognise any resulting gain or loss in profit or loss. This clarification applies to lease liabilities that are extinguished on or after the beginning of the annual reporting period in which the entity first applies that amendment. In order to resolve an inconsistency between IFRS 9 and IFRS 15, trade receivables are now required to be initially recognised at 'the amount determined by applying IFRS 15' instead of at 'their transaction price (as defined in IFRS 15)'. IFRS 10 was amended to use less conclusive language when an entity is a 'de-facto agent' and to clarify that the relationship described in paragraph B74 of IFRS 10 is just one example of a circumstance in which judgement is required to determine whether a party is acting as a de-facto agent. IAS 7 was corrected to delete references to 'cost method' that was removed from IFRS Accounting Standards in May 2008 when the IASB issued amendment Cost of an Investment in a Subsidiary, Jointly Controlled Entity or Associate.

The Company is currently assessing the impact of these amendments on its financial statements.

Amendments to IFRS 9 and IFRS 7 - Contracts Referencing Nature-dependent Electricity (issued on 18 December 2024 and effective for annual periods beginning on or after 1 January 2026). The IASB issued amendments to help companies better report the financial effects of nature-dependent electricity contracts, which are often structured as power purchase agreements (PPAs). Current accounting requirements may not adequately capture how these contracts affect a company's performance. To allow companies to better reflect these contracts in the financial statements, the IASB issued the related amendments to IFRS 9 *Financial Instruments* and IFRS 7 *Financial Instruments. Disclosure*. The targeted amendments include: (a) clarifying the application of the 'own-use' requirements; (b) permitting hedge accounting if these contracts are used as hedging instruments; and (c) adding new disclosure requirements to enable investors to understand the effect of these contracts on a company's financial performance and cash flows.

Based on the Company's assessment, these amendments will not have significant impact on the financial statements.

- c. Standards, interpretations and amendments thereto that have not been endorsed by the European Union and early adopted by the Company:

IFRS 18 Presentation and Disclosures in Financial Statements (issued on 9 April 2024 and effective for annual periods beginning on or after 1 January 2027). In April 2024, the IASB has issued IFRS 18, the new standard on presentation and disclosure in financial statements, with a focus on the statement of profit or loss. The key new concepts introduced in IFRS 18 relate to:

- the structure of the statement of profit or loss;
- required disclosures in the financial statements for certain profit or loss performance measures that are reported outside an entity's financial statements (that is, management-defined performance measures);
- enhanced principles on aggregation and disaggregation which apply to the primary financial statements and notes in general.

IFRS 18 will replace IAS 1; many of the other existing principles in IAS 1 are retained, with limited changes. IFRS 18 will not impact the recognition or measurement of items in the financial statements, but it might change what an entity reports as its 'operating profit or loss'. IFRS 18 will apply for reporting periods beginning on or after 1 January 2027 and also applies to comparative information.

The Company's management is currently assessing the impact of IFRS 18 on the financial statements.

2.2 Presentation currency

All amounts in these financial statements have been measured and presented in the euros (EUR), which is an official currency of the Republic of Lithuania. These financial statements are presented in EUR '000 unless otherwise stated.

2.3 Intangible assets

The Company's intangible assets are recognised if it is probable that future economic benefits associated with the asset will flow to the Company and the cost of the asset can be measured reliably. Intangible assets are carried at cost, see Note 6.

The useful lives of intangible assets other than those with indefinite useful lives are 4 to 8 years.

After initial recognition, intangible assets are stated at cost less accumulated amortisation and impairment losses, if any.

Intangible assets mainly consist of software, licences and other intangible assets used in the Company's activities.

Special land use conditions (protected areas)

In its financial statements for the year ended 31 December 2020, the Company recognised as intangible assets a commitment to register and a right to use the land parcels of third parties on the basis of the special land use conditions. The special land use conditions mean conditions involving certain restrictions or limitations on the activities carried out on the land parcel, which depend on the geographic location, the principal purpose of use, the method of use of the land parcel, and on the environmental and public health needs. The special land use conditions apply for as long as there is an object, in respect of which the protected areas have been established, irrespective of the physical condition of such object; or the special land use conditions may be established when there is an intention to implement a project. The special land use conditions remain in force for indefinite period. Since the useful life of the intangible assets is indefinite, such assets are not amortised. The useful life is not limited because the special land use conditions are established for the land parcels for indefinite period.

A provision for non-current liabilities in relation to the commitment to register the special land use conditions (protected areas) has been formed under IAS 37 (see Note 22).

Maintenance costs and other subsequent expenditures of intangible assets

Maintenance costs of intangible assets are recognised as expenses in the reporting period when they are incurred. Updating and development costs of intangible assets incurred subsequent to their acquisition or creation are recognised as expenses in the reporting period when they are incurred, except for software updating, modification, upgrading or new version installation costs that are capitalised by adding them to the cost of that software or recognising as a separate item of non-current intangible assets. In such case, the remaining useful life of the former software is re-measured and impairment is recognised for the remaining net book amount, if any.

2.4 Property, plant and equipment

Assets with a useful life longer than one year are classified as property, plant and equipment.

The Company's items of property, plant and equipment are stated at revalued amounts, based on periodic (at least every 5 years) valuations performed by independent valuers, less accumulated depreciation and impairment losses (Note 7).

Any accumulated depreciation and impairment losses at the date of revaluation are eliminated against gross carrying amount of the asset and net amount is restated to the revalued amount of the assets.

Increases in the carrying amount arising on the first revaluation of property, plant and equipment are credited to revaluation reserve directly in equity and decreases are recognised in the profit and loss account. Decreases in the carrying amount arising on the subsequent revaluation of property, plant and equipment that offset previous increases of the same asset are charged against revaluation reserve directly in equity, whereas all other decreases are charged to the profit and loss account. Revaluation increases in property plant and equipment value that offset previous decreases are taken to the profit and loss account. All other increases in the carrying amount arising on subsequent revaluations of property, plant and equipment are credited to revaluation reserve. Each year the difference between depreciation based on the revalued carrying amount of the asset charged to the statement of comprehensive income and depreciation based on the asset's original cost is transferred from revaluation reserve to retained earnings, after considering the effect of deferred income tax. Upon the sale or write-off of an asset item, any balance related to these assets is transferred from revaluation reserve to retained earnings.

Interest and other borrowing costs (the bank's administration charges, etc.) are included in the acquisition cost of property, plant and equipment if they are directly attributable to the acquisition of a qualifying asset. A qualifying asset is asset that is developed on the basis of a project with the value of not less than EUR 1 million and that necessarily takes no less than 12 months to get ready for its intended use or sale.

Variable payments for the separate acquisition of property, plant and equipment that are dependent on future performance (such as revenues or profits) are accounted for in the cost of property, plant and equipment and liabilities, when the variable payment can be estimated reliably and the asset is able to operate in the manner intended by the Company's management. After initial recognition, value changes of variable payments are recognised in profit or loss.

Property, plant and equipment also includes the minimum quantity of natural gas contained in the gas pipelines (line pack) which is necessary to ensure a stable functioning of the transmission system. This part of property, plant and equipment is not depreciated, because the Company will be able to sell such natural gas at the end of the useful life of the gas transmission pipeline, and accordingly, the value of such natural gas represents the residual value of the gas transmission pipeline.

Emergency reserve inventories meeting the criteria of non-current assets are classified as property, plant and equipment. The carrying amount of inventories written off during repair, technical maintenance and emergency liquidation are recorded in the statement of profit or loss or added to the carrying amount of assets under maintenance.

Depreciation is calculated on a straight-line basis over the following estimated useful lives:

Land	-	
Buildings	25 - 60	years.
Other structures and engineering networks	18 - 25	years.
Gas pipelines and associated equipment	55 - 70	years.
Plant and machinery	5-25	years.
Motor vehicles	7	years.
Other PP&E	4-10	years.

The useful lives, residual values and depreciation method are reviewed annually to ensure that they are consistent with the expected pattern of economic benefits from items of property, plant and equipment.

The Company has land with indefinite useful life, which is not depreciated.

Construction work in progress includes items of property, plant and equipment that are under construction. The cost of such assets includes design, construction works, plant and equipment being installed, and other directly attributable costs. Construction work in progress is not depreciated until the construction of asset is completed and the asset is put into operation. Prepayments for non-current assets are classified as non-current assets because they are used in long-term activities and are presented in the balance sheet line item "construction work in progress".

Maintenance, repair, reconstruction and other subsequent costs of property, plant and equipment

Maintenance costs of property, plant and equipment are recognised as expenses of the reporting period when they are incurred. The costs of the day-to-day servicing of an item of PP&E are not included in the cost of that item. Rather, these costs are recognised as expenses when they are incurred. The purpose of these expenditures is often described as for the 'repairs and maintenance' of the property, plant and equipment. When property, plant and equipment is subject to reconstruction (major enhancement), such reconstruction/major enhancement works are recognised as a separate component of PP&E and the net book amount of the component of the replaced part of assets is written off. A condition of continuing to operate an item of property, plant and equipment may be performing regular major inspections for faults regardless of whether parts of the item are replaced, its cost is recognized in the carrying amount of the item of property, plant and equipment as a separate component if the recognition criteria are satisfied and the costs of such inspection are material. Any remaining carrying amounts of the cost of previous inspection (as distinct from physical parts) are written-off to operating expenses of the reporting period in the statements of profit or loss and other comprehensive income.

Impairment of property, plant and equipment and intangible assets

At each reporting date, the Company review the carrying amounts of their property, plant and equipment to determine whether there are any indications that those assets have suffered an impairment. If any such indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss (if any).

The recoverable value is the higher of an asset's fair value less costs to sell and the value in use. In assessing the value in use, the expected future cash flows are discounted to their present value using the discount rate that reflects current market assessments of the time value of money and the risks specific to the asset for which the estimates of future cash flows have not been adjusted.

If the recoverable amount of an asset (or cash-generating unit) is estimated to be less than its carrying amount, the carrying amount of the asset (cash-generating unit) is reduced to its recoverable value. An impairment loss is recognised immediately in profit or loss, unless the relevant asset is carried at a revalued amount, in which case the impairment loss is treated as a decrease of revaluation reserve.

Where an impairment loss subsequently reverses, the carrying amount of the asset (cash-generating unit) is increased to the revised estimate of its recoverable amount, but so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognised for the asset (cash-generating unit) in prior years. A reversal of an impairment loss is recognized immediately in profit or loss, unless the relevant asset is carried at a revalued amount, in which case the reversal of the impairment loss is treated as an increase in revaluation reserve (without exceeding the amount of previous impairment).

2.5 Right of use assets

Right-of-use assets are assets that the Company has the right to manage during the lease term. The Company recognises right-of-use assets for all types of leases, including the lease of a right-of-use asset in case of sublease, but excluding leases of intangible assets, short-term leases and leases of low value assets.

Initial measurement of right-of-use assets

At the commencement date, the Company measures right-of-use assets at cost, which consists of: the present value of the initial measurement of the lease liability, initial costs incurred directly attributable to the underlying asset, any lease payments at the commencement date, less any lease incentives.

Subsequent measurement of right-of-use assets

After the initial recognition, the Company applies a cost method for right-of-use assets: the carrying amount of the asset at the respective date is calculated as the difference between the acquisition cost and the accumulated depreciation, plus any subsequent adjustments for the remeasurement of lease liability.

The calculation of depreciation of right-of-use assets is started from the date on which the assets are transferred for the use (the commencement date) until the earlier of these dates: the end of the lease term and the end of the useful life.

The Company calculates depreciation of right-of-use assets using the following rates:

Land*	99	years.
Buildings	from 5 to 10	years.
Motor vehicles	from 3 to 4	years.

* The Company applies the portfolio method for the land lease agreements concluded with the municipalities not by auction, i.e. a set of the agreements of the Company is accounted for as a single agreement due to similar criteria. Regardless of the remaining term of the land lease agreement, in accordance with the requirements of the legal acts, the agreements must be extended for as long as the facilities of the Company exist on the land plots. When assessing the flow generated by the infrastructure assets of the Company (for the calculation of the recoverable amount of assets), an infinite flow is projected as the ongoing reconstruction and repair works allow using the assets for a longer period than the established original depreciation rates. For this reason, the lease of land is subject to a substantially infinite rate corresponding to the original term of the agreement – 99 years.

2.6 Financial assets and liabilities

The Company recognises a financial asset in the statement of financial position only when they become a party to the contractual provisions of the financial instrument, the purchase or sale of the financial asset is recognised or derecognised on the date of purchase/sale.

At initial recognition, the Company measures the financial assets at fair value, except for trade receivables that do not include a significant component of financing. Initial measurement of financial assets other than those measured at fair value through profit or loss, includes the fair value of the instrument and transaction costs directly attributable to the acquisition of the financial asset.

Transaction costs include all fees and commissions that the Company would not have paid if they had not entered into a financial instrument contract.

Financial assets measured at amortised cost

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. They are recognised as current assets, except for the loans and receivables with maturity term of more than 12 months after the date of the statement of financial position, in which case they are recognised as non-current assets.

Loans and receivables are initially recognised at cost (fair value of the amount receivable) and subsequently amortised cost using the effective interest rate method. Gains and losses are recognised in the statement of profit or loss when the assets are derecognised or impaired, as well as through the amortisation process.

Financial assets measured at fair value through profit or loss

The Company accounts for financial assets subsequently measured at fair value through profit or loss using a business model, the goal of which is achieved through the collection of contractual cash flows and the sale of financial assets.

The Company does not have financial assets held for trading that are acquired for the purpose of selling in the near future, and within such category only classify the financial asset that arises on disposal of a business or investment and that represents a non-equity contingent consideration.

Expected credit losses

The Company seeks to recognise the expected credit losses for the period before the financial instrument becomes past due. Normally, credit risk increases significantly before a financial instrument becomes past due or other delay factors are observed from the debtor (such as restructuring, bankruptcy, other economic difficulties of a client, etc.). Therefore, if there is a considerable amount of cost or effort to obtain reasonable and reliable information that is more forward-looking than past due payments, it should be based on the assessment of credit risk changes.

Expected credit losses are recognised based on individually or collectively assessed credit risk of loans and trade receivables, the assessment of which is based on all reasonable and supportable information, including forward-looking information.

Lifetime expected credit losses of trade receivables are assessed taking into consideration the level of credit risk. The individual assessment basis is applied to debts with a high level of credit risk concentration or when there is a significant increase in the probability of credit losses. During the individual assessment, information on the credit history of a particular borrower, its financial position as at the date of assessment is analysed, including forward-looking information that would allow to timely determine whether there has been a significant increase in the credit risk of that particular borrower, thus enabling making judgement on the recognition of lifetime expected credit losses in respect of that particular borrower.

Lifetime expected credit losses for loans receivable and trade receivables are accounted for through profit or loss using the contra account of allowance for doubtful trade receivables.

The Company derecognises loans receivable and trade receivables when it loses the right to receive contractual cash flows from financial assets.

Trade payables and other financial liabilities, borrowings

Financial liabilities, borrowings

Financial liabilities, including borrowings, are recognised initially at fair value, less transaction costs.

In subsequent periods, financial liabilities are measured at amortised cost using the effective interest rate method. Interest expense is recognised using the effective interest rate method.

If a financing agreement concluded before the date of the statement of financial position proves that the liability was non-current as of the date of the statement of financial position, such financial liability is classified as non-current.

Trade payables

Trade payables represent commitments to pay for goods and services acquired from suppliers in the ordinary course of business. Trade payables are classified as current liabilities if the term of their settlement is less than one year; otherwise, they are recognised as non-current liabilities.

Derecognition of financial liabilities

A financial liability is derecognised when the obligation under the liability is settled, cancelled or expires. When an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as derecognition of the original liability and the recognition of a new liability. The difference in the respective amounts of financial liabilities is recognised in the statement of comprehensive income.

2.7 Inventories

Inventories consist of spare parts, consumables, and natural gas contained in the gas pipelines used in the activities and for provision of services. Inventories also include spare parts or metal scrap which is fit for use and was retrieved from written off items of property, plant and equipment.

Inventories are initially recorded at acquisition cost. Subsequent to initial recognition, inventories are stated at the lower of cost and net realisable value.

The cost of inventories includes acquisition price and related taxes that are not subsequently recovered from tax administration authorities and costs associated with bringing inventory into their current condition and location. Other costs are included in the cost of inventories to the extent they are related to bringing inventory into their current condition and location. The cost of inventories is determined net of trade discounts.

The cost of inventories, except for natural gas, is determined using the first-in, first-out (FIFO) method, according to which write-offs are firstly carried out in respect of the same type of inventories that were acquired first.

The cost of inventories which consist of natural gas contained in the gas pipelines is determined using the weighted average costing method. The cost of one unit of energy of natural gas (kWh) is determined by applying the weighted average costing method using the following formula:

The cost of one energy unit of natural gas (kWh) = (opening balance of natural gas (quantity * price) + purchases of natural gas over the period (quantity * price)) / quantity of natural gas (opening balance + purchases of natural gas over the period).

Purchases of natural gas from 1 March 2022 exclude gas purchased for the balancing of the system user.

2.8 Cash and cash equivalents

Cash includes cash at banks. Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash with original maturities of three months or less and that are subject to an insignificant risk of change in value.

If there are indications that cash and cash equivalents may not be recoverable, impairment is accounted for. Impairment is recorded in the statement of profit or loss within operating expenses for the period during which it occurred.

2.9 Grants

Grants are recognised when the Company complies with all the conditions attached to the grants, as set out in the respective grant agreement, and when there is a reasonable assurance that the grant will be received.

Government grants or grants received from the EU in a form of non-current assets or intended for purchase of non-current assets are considered as grants related to assets.

At the Company level, grants are recognised by deducting them from the asset's carrying amount. For the purpose of the statement of profit or loss and other comprehensive income, grants are recognised over the useful life of the related asset as a deduction from depreciation expenses.

Accumulated grants receivable are classified as other current assets when, according to the agreement, the European Commission undertakes a commitment to fund strategic projects and there is strong evidence that the funding will be received.

Grants received as a compensation for the expenses or unearned income in the current or previous reporting periods, also all grants other than grants related to assets, are considered as grants related to income. Income-related grants are recognised as utilised to the extent of the expenses incurred during the reporting period or unearned income to be compensated by that grant.

For the purpose of the statement of profit or loss, income-related grants are recognised when related costs are incurred, for which the grant was intended to compensate, by adding them to other income. If no connection can be established between the grants and incurred costs or deferred expenses, they are recognised as income during the period they are received or when the Company meets all the conditions attached to grants, as established in the respective grant agreement, and there is a reasonable assurance that the grant will be received.

2.10 Lease liabilities

Initial measurement of the lease liability

The amount of the initial measurement of lease liability is calculated as the present value of lease payments not paid at the commencement date.

The lease payments are discounted using the incremental borrowing rate. The incremental borrowing rate is determined as the rate at which the Company would be able to borrow funds for the purpose of acquiring certain assets for a respective period.

At the commencement date, the lease payments included in the measurement of lease liability comprise the following payments:

- fixed payments, less any lease incentives receivable;
- variable lease payments that depend on an index or a rate;
- amounts expected to be payable by the Company under residual value guarantees;
- the exercise price of a purchase option if the Company are reasonably certain to exercise that option;
- payments of penalties for terminating the lease, if the lease term reflects the Company exercising an option to terminate the lease.

Subsequent measurement of lease liability

Subsequent to initial recognition, the Company recognise a change in the value of the lease liability by:

- increasing the carrying amount to reflect interest on the lease liability;
- reducing the carrying amount to reflect the lease payments made; and
- remeasuring the carrying amount to reflect any lease modifications or revised lease payments.

For a lease modification that is not accounted for as a separate lease, the Company account for the remeasurement of the lease liability by:

- decreasing the carrying amount of the right-of-use asset to reflect the partial or full termination of the lease for lease modifications that decrease the scope of the lease. The Company recognise in profit or loss any gain or loss relating to the partial or full termination of the lease;
- making a corresponding adjustment to the right-of-use asset for all other lease modifications.

The Company classifies assets as right-of-use assets by recognising under non-current assets in the statement of financial position, if the asset and lease contract meet all of the following criteria:

- the lease is not a short-term (12 months or more) or short-term lease with a purchase option;
- value of the leased item or group of items/underlying asset is not less than EUR 4,000 and therefore does not qualify as a lease of a low-value asset;
- if the contract conveys the right to control the use of an identified asset for a period of time, i.e. to obtain economic benefits from use of the identified asset and to direct the use of the identified asset.

The Company present its lease liabilities separately from other liabilities in the statement of financial position. Interest expense on the lease liability is presented separately from the depreciation charge for the right-of-use assets. The interest expense on the lease liability is a component of finance costs recognised in the statement of comprehensive income.

2.11 Long-term employee benefits

Each employee in the Company of retirement age who terminates his/her employment with the Company, upon retirement receives defined benefit in the amount established by the Lithuanian and the Company's internal legislation. A benefit liability is recognised in the statement of financial position and reflects the present value of such benefits at the reporting date. The non-current benefit liability at the reporting date is estimated with reference to actuary valuations, using the projected relative unit method. The present value of the defined non-current benefit liability is determined by discounting the estimated future cash flows using the effective interest rates as set for government debentures denominated in a currency in which employee benefits are expected to be made and with maturity similar to that of the related liability.

2.12 Provisions, contingent assets and liabilities

Provisions are recognised when the Company has a legal obligation or irrevocable commitment, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation. The amount recognised as a provision is the estimate of the expenditure required to settle the obligation (the expected value). Where the effect of the time value of money is material, the amount of a provision is discounted using a pre-tax effective interest rate that, if necessary, reflects the risks specific to the liability. Where discounting is used, the carrying amount of a provision increases in each period to reflect the passage of time. This increase is recognised as borrowing cost.

Provisions are reviewed at the end of each reporting period and adjusted to reflect the changes in circumstances. If the amount of the provision is discounted, the amount reversed at each reporting period is equal to the discounting effect (interest expenses). If circumstance change and the provision is no longer necessary, the provision is reversed in the statement of profit or loss and other comprehensive income through the expense line item where it has been recorded initially at the time of establishment.

Provisions are classified as non-current liabilities, if the Company's management expect to settle them after twelve months from the date of the statement of financial position, and as current liabilities, if the Company's management expect to settle them within twelve months from the date of the statement of financial position.

A contingent liability is a liability that may arise from past events, or a present obligation that arises from past events, when it is not probable that resources embodying economic benefits will be required to settle the obligation, or the amount of the obligation cannot be measured reliably.

Contingent liabilities are not accounted for, but are disclosed in the notes to the financial statements unless the probability of the loss of resources embodying economic benefits is remote.

A contingent asset is an asset that may arise from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events, that are not wholly within the Company's control.

Contingent assets are not recognised in the financial statements, but are described in the notes to the financial statements when it is probable that income or economic benefits will be received.

2.13 Income tax

Income tax expense for the period comprises current and deferred income tax.

Income tax

The income tax expense for the current year is calculated on the current year's profit before tax, as adjusted for certain non-deductible expenses/non-taxable income and losses of previous tax periods. Income tax is calculated using the tax rate effective as at the date of issue of the financial statements. The applicable income tax rate was 16% in 2025, and 15% in 2024. Current year income tax may be reduced by tax losses carried forward. In addition, the Company can take over tax losses from the Group companies, provided it meets the requirements laid down in the Law on Corporate Income Tax.

Deferred tax

Deferred taxes are calculated using the balance sheet liability method. Deferred taxes reflect the net tax effects of temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for income

tax purposes. Deferred income tax liability is recognised for all temporary differences that will increase taxable profit in the future, and deferred tax asset is recognised only to the extent it is likely to reduce the taxable income in the future.

Deferred tax assets are reviewed at each financial reporting date, and if it is not probable that the Company will generate sufficient taxable profit to realize these assets, they are reduced to an amount which is likely to reduce the taxable profit in future. Deferred income tax assets and liabilities are estimated using the tax rate that has been applied when calculating income tax for the year when the related temporary differences are to be realised or settled.

Deferred tax assets and liabilities are offset only where they relate to income tax assessed by the same fiscal authority or where there is a legally enforceable right to offset current tax assets and current tax liabilities.

Current income tax and deferred income tax

Current income tax and deferred income tax are recognised as income or expenses and included in net profit or loss for the reporting period, except for the cases when tax arises from a transaction or event that is recognized directly in equity or in other comprehensive income, in which case taxes are also recorded in equity and other comprehensive income respectively.

2.14 Revenue recognition

Recognition and measurement of the Company's revenue is based on a five-step revenue recognition model which is applied to all contracts with customers. The Company's revenue is recognised at a point in time or over time, during which the performance obligation is settled, i.e. the control of services or goods is transferred to the customer.

The Company's revenue includes as follows:

- revenue from natural gas transmission and related services;
- revenue from administration of the LNG terminal funds;
- other income;
- finance income.

Revenue from natural gas transmission and related services

Revenue from transmission services

Revenue from system users for natural gas transmission services is recognised over time, based on the reported data on natural gas quantities, distributed to the system users connected to the distribution system, and based on the statements of transmitted natural gas that were signed with the system users directly connected to the transmission system.

Revenue from balancing services

The Company's revenue from system balancing products consists of operational balancing revenue, transit flow balancing revenue, and system users balancing revenue.

In providing operational balancing and transit flow balancing services, the Company acts as principal. In providing system user's balancing services, the Company acts as an agent.

The concept of steering difference is defined in the European Commission Regulation (EU) 2015/703 establishing a network code on interoperability and data exchange rules of 30 April 2015.

Steering difference means the difference between the quantity of gas that the transmission system operators had scheduled to flow and the measured quantity for an interconnection point.

In other words, steering difference is the difference between commercial and physical gas flow. The agreement between two adjacent operators to apply steering difference enables to ensure that, when organising gas transportation, system users are allocated the gas quantity they have nominated, and the resulting difference is accounted for by the adjacent system operators. Revenue from operational balancing is recognised when the physical gas flow exceeds the commercial gas flow, and the other system operator compensates the Company, as the transmission system operator, for the difference in the quantity of gas.

Below is described the revenue recognition for the provision of system user's balancing services.

Based on the EC regulation establishing a network code on gas balancing of transmission networks (the "Regulation"), the system users bear the responsibility of balancing their inputs against their off-takes. If the system users fail to balance gas at the entry/exit points, the Company is entitled to undertake the balancing actions as set forth in the Regulation. In accordance with the Regulation, the Company undertakes the balancing actions in respect of the system users with reference to measures on each gas day.

Revenue from balancing services is recognised when the transmission system user's imbalance quantity becomes negative, thereby causing natural gas shortfall. Expenses from balancing services are recognised when the transmission system user's imbalance quantity becomes positive, thereby causing natural gas surplus. As the Company seeks to ensure financial neutrality, it levies a neutrality charge for each reporting month with effect from 1 March 2022. Neutrality charge means a charge payable to/by the transmission system operator due to performance of its balancing activities. The neutrality charge represents the difference between the expenses and revenue of the transmission system operator from the balancing activities. The neutrality charge may be both positive and negative. When the neutrality charge is negative, the transmission system operator pays the neutrality charge to the system users. When the neutrality charge is positive, the system users pay the neutrality charge to the transmission system operator. The purpose of the neutrality charge is to ensure financial neutrality of the transmission system operator.

Due to amendments introduced in regulation of balancing activities with effect from 1 March 2022, the Company acts as an agent in its gas purchase/sale transactions and reports net result of balancing activities in the financial statements. The neutrality charge is expected to ensure a zero gain/(loss) from balancing activities. Acting as an agent in balancing gas purchase/sale transactions is explained by limited control of the balancing services and purchases of gas, absence of economic benefits, no discretion in establishing the price for the balancing services since the pricing is governed by law, no discretion in choosing a counterparty and inability to regulate demand. In addition, the activities of the Company, as the transmission system operator, are not associated with trade in natural gas, and the regulated balancing actions are performed for the benefit of all system users rather than for the benefit of a specific system user.

Revenue from administration of the LNG terminal funds

Based on the provisions of Article 5(2) of the Republic of Lithuania Law on Liquefied Natural Gas Terminal, the Company carries out the function of administration of the LNG terminal funds. The administration of the LNG terminal funds is performed in accordance with the Description of the procedure for the administration of funds intended to compensate for the construction and fixed operating expenses of the liquefied natural gas terminal, its infrastructure and connector, including subsequent amendments and supplements thereto (the title was changed on 18 December 2015 under the Council's Resolution No 03-653 of 17 December 2015), as approved by the Council's Resolution No. O3-294 of 9 October 2012. The Company collects/pays and administers the LNG terminal funds and acts as an intermediary on behalf of the State, and such activities do not generate any revenue/profit for the Company in the ordinary course of business. The LNG terminal funds are collected/repaid and transferred to the recipients/payers of the LNG terminal funds. The share of the LNG terminal funds intended solely to cover the administration expenses of the LNG terminal funds is considered as the Company's revenue. The amount of administration of the LNG terminal funds is calculated as the amount of costs that are expected to be incurred, by taking into account the actual costs incurred in the previous periods, and such amount is specified in the Council's certificate. The LNG terminal funds are not treated as the Company's revenue/expenses, but they are rather accounted for as other receivables/other payables and other financial assets.

Other income

Connection fees on connection of new consumers and producers to the gas transmission network

The connection "service" is considered as a single performance obligation together with the future gas transmission services, as defined in IFRS 15 Revenue from contracts with customers, because the pricing of the connection fee is directly linked to the pricing of the transmission services. Therefore revenue (including the compensation for the connection to the grid) are recognised in profit or loss over time during the useful life (or lives) of the connection assets constructed / built by Company and compensated by a consumer.

Accounting for the connection fees on connection of new producers is based on the accounting policies for grants (IAS 20 Accounting for government grants and disclosure of government assistance), and the acquisition cost of the assets is reduced by the amount of the connection fee.

Relocation (reconstruction) of infrastructure facilities owned under the title by the Company upon a customer's request

Upon a customer's request, the Company carries out relocation or reconstruction of infrastructure facilities and incurs related expenses. Such relocation work does not give rise to any economic benefits for the Company, and all expenses related to such work are compensated in full by a customer through acquisition of energy facility relocation service from the Company.

Based on IFRS and the Company's accounting policies, there are two approaches for recognition of such transactions:

1. When relocation of assets involves substantial improvement of assets. Under IAS 16 Property, plant and equipment, the relocation expenses incurred by the Company are added to the acquisition cost of the related assets. Accounting for the compensation (i.e. relocation fee) due from a customer is based on the accounting policies for grants (IAS 20 Government grants and disclosure of government assistance) and the acquisition cost of the assets is reduced by the amount of the relocation fee. Since all relocation costs are compensated in full for the Company by a customer, such transaction results in a zero impact on the Company's profit or loss, i.e. the Company neither incurs additional expenses nor earns additional revenue from such transaction.
2. When relocation of assets does not involve substantial improvement of assets. Under IFRS 15 Revenue from contracts with customers, the Company earns revenue from relocation service (i.e. revenue is recognised at the time of rendering the service) and incurs relocation service expenses (i.e. all costs incurred on relocation of assets are recognised as expenses in the same period as revenue from relocation service). Since all relocation costs are covered in full for the Company by a customer, such transaction results in a zero impact on the Company's profit or loss, i.e. revenue earned by the Company equals expenses incurred.

Gain from disposal of property, plant and equipment, lease income, income from sale of other goods and provision of other services, income from default charges and fines collected from the contractors as a result of late fulfilment of work, income-related grants are recognised by the Company as other income.

2.15 Expense recognition

Expenses incurred in relation to revenue earned during the reporting period are recognised by the Company on an accrual basis, and based on the following principles: 1) the costs are recognised as expenses to the extent of the value of goods sold or services rendered, since the criterion for recognition of expenses is that they have been incurred to earn revenue of the reporting period; 2) the costs incurred by the Company during the reporting period are recognised as expenses of the reporting period immediately, unless they can be linked to earning of the specific revenue, and no income is expected to be earned in relation to such expenses in the next periods.

The Company uses expense classification by type.

Taxes such as real estate tax, land tax, land rent tax, taxes related to environmental pollution, non-deductible value added tax, etc. are recognized as expenses.

2.16 Finance income and costs

Finance income

Finance income includes income earned by the Company from financing activities, such as foreign exchange gain, when cash balances are translated into the functional currency euro, interest income on cash balance.

The Company's finance costs include as follows:

- foreign exchange loss from financing transactions;
- interest on borrowings.

Interest income and expenses are recognised on accrual basis considering the outstanding balance of debt and the applicable interest rate.

2.17 Cash flows

The Company reports cash flows using the indirect method. Reporting of cash flows from operating activities based on the indirect method means that net profit/(loss) for the reporting period is presented as cash inflows or outflows from operating activities of

the Company for the reporting period. Cash inflows and outflows from investing and financing activities for the reporting period are presented separately unless cash flows are presented on a net basis.

For the purpose of the Company's financial statements, dividends paid are reported as cash flows of financing activities, whereas dividends received are reported as cash flows of investing activities.

For the purpose of the Company's financial statements, interest paid is reported as cash flows of financing activities, whereas interest received is reported as cash flows of investing activities.

3. Accounting estimates and assumptions

The preparation of financial statements in conformity with International Financial Reporting Standards requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities, income and expenses and disclosure of contingencies. The significant areas of estimation used in the preparation of these financial statements relate to the disposal of investments in associate and derivatives (Notes 3.1, 31), provisions (Notes 3.2, 22), and the review of the fair value measurement of property, plant and equipment (Notes 3.3, 7). Future events may occur which may cause the assumptions used in arriving at the estimates to change. The effect of any changes in estimates will be recorded in the financial statements, when determinable.

3.1 Disposal of the investment in the associate GET Baltic

On 10 October 2025, the Company disposed the remaining 34% shareholding in its associate GET Baltic. On 31 May 2023, the Company issued the put option enabling the Company to sell the remaining shareholding in GET Baltic at a fixed price and the call option for the investor to purchase the remaining shares of GET Baltic at a fixed price, which, in the Company management's opinion, were designated as derivatives related to the sale transaction of remaining shares, therefore had an impact on the net transaction gain/loss. Before exercise of the put and call options, they were measured at fair value. For more information on the share options and the disposal of investment in associate see Note 31.

3.2 Provisions

The Company has a legal dispute with a construction contractor over the non-performance or improper performance of warranty obligations regarding the defects identified in the works during the construction of the gas pipeline interconnection between Poland and Lithuania (GIPL), which the contractor refuses to remedy. As a result of the non-performance or improper performance of the guarantee obligations, in 2024, the Company lodged claims for payment of the guarantee funds, and has guarantee funds received in the amount of EUR 5,815 thousand. The lawfulness of the claims for payment of the guarantee funds is being challenged by the contractor in court. In view of the uncertainty surrounding the outcome of the legal proceedings, as at 31 December 2024, the Company recognised a provision for the potential repayment of the guarantee funds. As at 31 December 2025, there were no changes in the parties' financial claims in litigation, and no new circumstances or assumptions had arisen, affecting the position reflected in the financial statements. For more information on the provision and legal dispute see Notes 22 and 37.

3.3 Valuation of property, plant and equipment

Based on the Company's assessment, the carrying amount of property, plant and equipment as at 31 December 2025 approximated the fair value of the assets, as there were no changes that could have a material effect on the changes in the fair value, the impairment of non-current assets, or the changes in useful life. The remaining useful life of property, plant and equipment and the depreciation method used reflect the actual period during which the asset will provide economic benefit. No indications of impairment were identified. The last revaluation of property, plant and equipment was carried out as at 31 December 2023. For more information on the results of impairment review see Note 7.

4. Reclassification of comparative figures in the financial statements

In 2025, the Company made changes to the classification of items of non-current and current financial assets at amortised cost in the statement of financial position, presenting them separately from the items of non-financial assets. Accordingly, non-current and current financial liabilities at amortised cost are presented separately from non-financial liabilities. Based on the Company's assessment, such reclassification of asset and liability items will be more consistent with the requirements of International Financial Reporting Standards and the information needs of users of financial information.

Below is the effect of reclassification on the items of the Company's statement of comprehensive income for 2024:

	31/12/2024 before reclassification	Reclassification	31/12/2024 after reclassification
Current assets			
Inventories	4,761	-	4,761
Prepayments	865	(865)	-
Contract assets	-	1,220	1,220
Trade receivables	9,763	-	9,763
Other receivables	13,152	(13,152)	-
Other financial assets at amortised cost	-	6,820	6,820
Other non-financial assets	-	12,712	12,712
Prepaid income tax	-	-	-
Other financial assets	6,735	(6,735)	-
Cash and cash equivalents	31	-	31
Total current assets:	35,307	-	35,307
Non-current liabilities			
Borrowings	55,312	-	55,312
Lease liabilities	3,492	-	3,492
Contract liabilities	1,700	-	1,700
Provisions	937	-	937
Total non-current liabilities:	61,441	-	61,441
Current liabilities			
Current borrowings	23,563	(23,563)	-
Current portion of non-current borrowings	5,919	(5,919)	-
Borrowings	-	5,919	5,919
Financial borrowings from group companies	-	23,563	23,563
Lease liabilities	986	-	986
Trade payables	6,384	(17)	6,367
Other financial liabilities at amortised cost	-	29,300	29,300
Prepayments received and contract liabilities	1,036	(1,036)	-
Income tax liability	1,071	-	1,071
Derivative liability at FVTPL	-	654	654
Other payables and current liabilities	45,197	(45,197)	-
Provisions	5,971	-	5,971
Other non-financial liabilities	-	16,296	16,296
Total current liabilities:	90,127	-	90,127

During the reclassification, EUR 865 thousand of prepayments, as a non-financial item, was transferred to other non-financial assets.

Reclassification of other receivables:

- taxes receivable from the State budget, grants receivable and LNGT funds receivable totalled EUR 11,847 thousand were reclassified to other non-financial assets;
- contract assets of EUR 1,220 thousand were presented as a separate item;
- interest receivable on term deposits and other receivables totalled EUR 85 thousand and were reclassified to financial assets at amortised cost.

Term deposits, security deposits and LNGT funds totalled EUR 6,735 thousand and were also recognised as financial assets at amortised cost, by reclassifying them from financial assets.

The reclassification of other payables and current liabilities:

- employment-related liabilities, taxes payable to the State budget, LNGT funds accrued and payable totalled EUR 15,900 thousand and were reclassified to other non-financial liabilities;
- fee payable to the regulator totalled EUR 278 thousand was reclassified from accrued expenses to other non-financial liabilities;
- dividends payable, CBCA contribution payable, accrued expenses and other payables totalled EUR 28,365 thousand and were reclassified to financial liabilities measured at amortised cost;
- EUR 654 thousand of derivative liabilities were presented as a separate item;

Prepayments received, current contract liabilities totalled EUR 118 thousand and were reclassified to other non-financial liabilities. Security deposits received totalled EUR 918 thousand and were reclassified to other financial liabilities at amortised cost.

The effect of reclassification on the items of the Company's statement of comprehensive income for 2023:

	01/01/2024 before reclassification	Reclassification	01/01/2024 after reclassification
Current assets			
Inventories	4,874	-	4,874
Prepayments	794	(794)	-
Contract assets	-	1,798	1,798
Trade receivables	9,030	-	9,030
Other receivables	19,074	(19,074)	-
Other financial assets at amortised cost	-	1,030	1,030
Other non-financial assets	-	17,568	17,568
Prepaid income tax	-	-	-
Other financial assets	528	(528)	-
Cash and cash equivalents	121	-	121
Total current assets:	34,421	-	34,421
Non-current liabilities			
Borrowings	60,962	-	60,962
Lease liabilities	2,933	-	2,933
Contract liabilities	1,530	-	1,530
Provisions	667	-	667
Total non-current liabilities:	66,092	-	66,092
Current liabilities			
Current borrowings	25,435	(25,435)	-
Current portion of non-current borrowings	5,649	(5,649)	-
Borrowings	-	5,988	5,988
Financial borrowings from group companies	-	25,096	25,096
Lease liabilities	317	-	317
Trade payables	5,335	(18)	5,317
Other financial liabilities at amortised cost	-	28,820	28,820
Prepayments received and contract liabilities	622	(622)	-
Income tax liability	-	-	-
Derivative liability at FVTPL	-	364	364
Other payables and current liabilities	41,950	(41,950)	-
Provisions	463	-	463
Other non-financial liabilities	-	13,406	13,406
Total current liabilities:	79,771	-	79,771

The prepayments, as a non-financial item, totalled EUR 865 thousand was transferred to other non-financial assets.

Reclassification of other receivables:

- taxes receivable from the State budget, grants receivable and LNGT funds receivable totalled EUR 16,774 thousand were reclassified to other non-financial assets;
- contract assets of EUR 1,798 thousand were presented as a separate item;
- interest receivable on term deposits and other receivables totalled EUR 502 thousand and were reclassified to financial assets at amortised cost.

Term deposits, security deposits and LNGT funds totalled EUR 528 thousand and were also recognised as financial assets at amortized cost, by reclassifying them from financial assets.

The reclassification of other payables and current liabilities:

- employment-related liabilities, taxes payable to the State budget, LNGT funds accrued and payable totalled EUR 12,981 thousand and were reclassified to other non-financial liabilities;
- fee payable to the regulator totalled EUR 330 thousand was reclassified from accrued expenses to other non-financial liabilities;
- dividends payable, CBCA contribution payable, accrued expenses and other payables totalled EUR 28,275 thousand and were reclassified to financial liabilities measured at amortised cost;
- EUR 354 thousand of derivative liabilities were presented as a separate item;

Prepayments received, current contract liabilities totalled EUR 95 thousand and were reclassified to other non-financial liabilities.

Security deposits received totalled EUR 527 thousand and were reclassified to other financial liabilities at amortised cost.

5. Segment reporting

Operating segments are reported in a manner consistent with the internal reporting provided to the chief operating decision-maker. The Company's chief operating decision-maker, who is responsible for allocating resources and assessing performance, has been identified as the Board of Directors that makes strategic decisions.

The Company has one operating segment, which is consistent with the Company's activity, i.e. the natural gas transmission segment.

The Company has a single geographical segment – the Republic of Lithuania. All non-current assets of the Company are domiciled in Lithuania, where the Company operates.

The Board as the main decision-making body monitors the results with reference to the financial reports that have been prepared using the same accounting policies as those used for the preparation of the financial statements, i.e., information on profit or loss, including the reported amounts of income and expenses.

Key performance indicators are net profit and profit before interest, taxes, depreciation and amortisation, loss on revaluation, impairment and write-off of property, plant and equipment (EBITDA, which is non-GAAP performance indicator). These indicators are calculated on the basis of data reported in the financial statements.

EBIT, which is non-GAAP performance indicator, represent profit before interest and taxes.

The Board also monitors adjusted performance indicators, particularly the adjusted EBITDA. Adjusted EBITDA ratio is EBITDA ratio further adjusted by adding management's adjustments. That is non-IFRS alternative performance measure. Management's adjustments include temporary regulatory differences resulting from the Council's decisions. Management's adjustments may have both positive and negative impact on the adjusted ratios for the period. In management's view, adjusted EBITDA ratio more accurately presents results of the operations and allows for an objective comparison of the results between the periods as revenue and costs have been adjusted due to the regulator's decisions or are of a one-off nature.

Management also analyses investments and net debt of segment.

The table below contains information on the natural gas transmission segment for the period ended 31 December 2025:

	Transmission of natural gas
Revenue and other income	69,716
Operating expenses, excl. depreciation, write-off and impairment	(52,397)
EBITDA	17,319
Adjusted EBITDA	27,436
Temporary regulatory differences for previous periods	4,621
Temporary regulatory differences for reporting period	5,496
Overall effect of management's adjustments on EBITDA	10,117
EBITDA (under IFRS) reconciliation to Net profit/loss	(15,959)
Depreciation and amortisation	(14,669)
Loss on impairment and write-off of property, plant and equipment	(23)
Finance costs, net	(2,064)
Income tax	195
Other gain (loss)	178
Share of net profit of associates	424
Net profit (loss)	1,360
Total assets	324,739
Net debt	(125,224)
Investments (additions of property, plant and equipment and intangible assets)	21,782

The table below contains information on the natural gas transmission segment for the period ended 31 December 2024:

	Transmission of natural gas
Revenue and other income	74,583
Operating expenses, excl. depreciation, write-off and impairment	(48,063)
EBITDA	26,520
Adjusted EBITDA	27,366
Temporary regulatory differences for previous periods	2,006
Temporary regulatory differences for reporting period	(1,160)
Overall effect of management's adjustments on EBITDA	846
EBITDA (under IFRS) reconciliation to Net profit/loss	(18,214)
Depreciation and amortisation	(14,932)
Loss on impairment and write-off of property, plant and equipment	(43)
Finance costs, net	(2,159)
Income tax	(1,196)
Other gain (loss)	(364)
Share of net profit of associates	480
Net profit (loss)	8,306
Total assets	327,196
Net debt	(82,534)
Investments (additions of property, plant and equipment and intangible assets)	6,405

As at 31 December 2025, there were three customers of the Company each generating over 10% of the Company's total revenue. Revenue from customers totalled EUR 38,812 thousand, whereof:

Customer A – EUR 23,128 thousand;

Customer B – EUR 8,460 thousand;

Customer C – EUR 7,224 thousand.

As at 31 December 2024, there were three customers of the Company each generating over 10% of the Company's total revenue. Revenue from customers totalled EUR 45,730 thousand, whereof:

Customer A – EUR 25,257 thousand;

Customer B – EUR 11,120 thousand;

Customer C – EUR 9,353 thousand.

6. Intangible assets

Movements on intangible assets account during the current and previous reporting period were as follows:

	Patents and licences	Computer software	Other intangible assets	Protected areas	Total
As at 31 December 2023	7	1,526	-	1,026	2,559
Cost (revalued amount)	55	5,571	5	1,026	6,657
Accumulated amortisation	(48)	(4,045)	(5)	-	(4,098)
Net book value as at 31 December 2023	7	1,526	-	1,026	2,559
Additions	-	460	-	-	460
Write-offs	-	(12)	-	-	(12)
Adjustment for changes in assumptions	-	-	-	(48)	(48)
Amortisation charge	(3)	(746)	-	-	(749)
As at 31 December 2024	4	1,228	-	978	2,210
Acquisition/revaluation amount	55	6,019	5	978	7,057
Accumulated amortisation	(51)	(4,791)	(5)	-	(4,847)
Net book value as at 31 December 2024	4	1,228	-	978	2,210
Net book value as at 31 December 2024	4	1,228	-	978	2,210
Additions	-	1,415	-	-	1,415
Write-offs	-	(89)	-	-	(89)
Adjustment for changes in assumptions	-	-	-	(14)	(14)
Amortisation charge	(3)	(413)	-	-	(416)
As at 31 December 2025	1	2,141	-	964	3,106
Acquisition/revaluation amount	55	7,345	5	964	8,369
Accumulated amortisation	(54)	(5,204)	(5)	-	(5,263)
Net book value as at 31 December 2025	1	2,141	-	964	3,106

The Company's intangible assets with the acquisition cost of EUR 50 thousand as at 31 December 2025 (EUR 63 thousand as at 31 December 2024) was fully amortised but still in use.

Depreciation of grants in amount of EUR 70 thousand as at 31 December 2025 (31 December 2024: EUR 177 thousand) was reported in the statement of profit or loss as an offsetting of depreciation of related assets against proceeds from grants.

Taking into account changes in the regulatory framework, the scope of services for establishing protection zones and classes of the areas planned to be purchased, each year, the Company reviews the estimated cost of establishing special land use conditions. Due to changes in assumptions, the value of provision and related intangible assets was reduced by EUR 14 thousand as at 31 December 2025 (by EUR 48 thousand as at 31 December 2024).

7. Property, plant and equipment

Movements on the property, plant and equipment account during the current and previous reporting period were as follows:

	Land	Buildings	Structures and equipment	Plant and machinery	Vehicles	Other PP&E	Construction work in progress	Total
As at 31 December 2023	136	7,647	228,189	37,702	135	4,668	5,876	284,353
Acquisition/revaluation amount	136	7,647	228,189	37,702	135	4,668	5,876	284,353
Accumulated depreciation	-	-	-	-	-	-	-	-
Net book value as at 31 December 2023	136	7,647	228,189	37,702	135	4,668	5,876	284,353
Additions	-	-	(2)	191	3	165	5,588	5,945
Write-offs	-	-	(441)	-	(2)	(1)	(29)	(473)
Sales	-	-	-	-	-	(2)	-	(2)
Impairment (reversal) of assets	-	-	-	-	-	-	-	-
Reclassification from/to inventories	-	-	(7)	77	(40)	-	-	30
Reclassifications between categories	-	1,278	6,064	259	-	1,344	(8,945)	-
Depreciation charge	-	(351)	(6,855)	(3,989)	(92)	(1,973)	-	(13,260)
Reversal of grants recognised	-	34	193	77	-	27	(170)	161
As at 31 December 2024	136	8,608	227,141	34,317	4	4,228	2,320	276,754
Acquisition/revaluation amount	136	8,959	233,996	38,306	96	6,201	2,320	290,014
Accumulated depreciation	-	(351)	(6,855)	(3,989)	(92)	(1,973)	-	(13,260)
Net book value as at 31 December 2024	136	8,608	227,141	34,317	4	4,228	2,320	276,754
Net book value as at 31 December 2024	136	8,608	227,141	34,317	4	4,228	2,320	276,754
Additions	-	-	705	251	552	288	18,571	20,367
Write-offs	-	-	-	-	-	(1)	(27)	(28)
Disposals	-	-	-	-	-	-	-	-
Impairment (reversal) of assets	-	-	-	-	-	-	17	17
Reclassification from/to inventories	-	-	(20)	99	-	(1)	-	78
Reclassifications between categories	-	1,561	2,851	518	-	1,243	(6,173)	-
Depreciation charge	-	(458)	(7,201)	(3,674)	(8)	(1,923)	-	(13,264)
Off-set of grants against non-current assets	-	-	-	-	-	-	-	-
As at 31 December 2025	136	9,711	223,476	31,511	548	3,834	14,708	283,924
Acquisition/revaluation amount	136	10,520	237,532	39,174	648	7,730	14,708	310,448
Accumulated depreciation	-	(809)	(14,056)	(7,663)	(100)	(3,896)	-	(26,524)
Net book value as at 31 December 2025	136	9,711	223,476	31,511	548	3,834	14,708	283,924

The part of the Company's property, plant and equipment, with the acquisition/revaluation cost of EUR 266 thousand as at 31 December 2025 (EUR 196 thousand as at 31 December 2024), was fully depreciated but still in use.

The Company's property, plant and equipment are stated at revalued amount, less the amounts of accumulated depreciation, recognised grants and impairment losses.

The cost of PP&E as at 31 December 2025 included: the prepayment for gas compressor during the Janiūnai GCS extension project amounting to EUR 12,465 thousand; the reconstruction of the main gas pipelines based on diagnostics results amounting to EUR

1,580 thousand; the installation of launching and receiving chambers, and the replacement of shot-off devices and connection to SCADA amounting to EUR 745 thousand; the reconstruction of the Elektrėnai GDS amounting to EUR 512 thousand; the renovation of cathodic protection systems amounting to EUR 479 thousand; the reconstruction of the Dispatching Building and the connection of rainwater collection networks to the city's network amounting to EUR 562 thousand; the upgrade of the GDS and GMS automation and electrical systems amounting to EUR 299 thousand.

In 2025, completed projects and PP&E put into operation amounted to EUR 6,173 thousand, of which the reconstruction of the Dispatching Building and the connection of rainwater collection networks to the city's network - EUR 1,969 thousand, the reconstruction of the main gas pipelines - EUR 1,845 thousand, the renovation of cathodic protection systems - EUR 547 thousand, the upgrade of perimeter, access, video, and security systems - EUR 547 thousand, the upgrade of automation and telemetry systems - EUR 545 thousand, the upgrade of other equipment - EUR 251 thousand, the installation of electricity supply and reserve power sources - EUR 218 thousand, the upgrade of pressure regulators in GDS and GMS - EUR 142 thousand, and the installation of electric car charging stations - EUR 109 thousand.

PP&E planned to be put into operation during 2026, 2027 and 2029 was recorded under construction work in progress at the amount of EUR 1,456 thousand, EUR 451 thousand and EUR 12,801 thousand, respectively.

Prepayments for PP&E, reflected under construction in progress:

	As at 31 December 2025	As at 31 December 2024
Carrying amount at the beginning of the period	20	48
Prepayment for PP&E during the period	12,017	269
Moved to construction in progress	(20)	(297)
Carrying amount at the end of the period	12,017	20

Depreciation of grants in amount of EUR 5,129 thousand as at 31 December 2025 (31 December 2024: EUR 5,181 thousand) was reported in the statement of profit or loss as an offsetting of depreciation of related assets against proceeds from grants.

As at 31 December 2025, the Company capitalised EUR 79 thousand of borrowing costs (interest) in the property, plant, and equipment, whereas, as at 31 December 2024, there were no any borrowing costs (interest) capitalised.

Fair value test of property, plant, and equipment

At least once a year, the Company assesses whether there is any indication that the carrying amount of property, plant and equipment recorded at revalued amount could materially differ from its fair value and performs the impairment test. The last revaluation of the Company's property, plant and equipment was carried out in 2023.

In 2025, the Company's management assessed external and internal factors that could have an impact on the impairment of property, plant and equipment. During the reporting period, no significant negative changes in the economic, market, or regulatory environment were identified. Also, no any other significant internal or external circumstances were identified that could indicate potential impairment of property, plant and equipment.

Nonetheless, the Company determine the asset's recoverable amount using a discounted cash flow technique. The test was performed at the level of cash generating unit (CGU), includes all natural gas transmission assets managed by the Company. The test identified that the carrying amount of the assets within the materiality limits corresponds to their value in use, therefore, as at 31 December 2025, no adjustment were made to the value of property, plant, and equipment.

The following key assumptions were used in the impairment test:

- a post-tax discount rate of 4.8% that correspond to the pre-tax discount rate of 5.7% and is close to the return on investments set by NERC for 2025;
- cash flows projected until 2030 in accordance with the Methodology for Determining Revenue From and Prices for Regulated Natural Gas Transmission Activities approved by NERC, and the financial plans approved by management;
- capital investments assessed under the updated Company's 10-Year Investment Plan;
- a terminal value was calculated at a 0% growth rate, which is considered reasonable due to the nature of the regulated activity, and its stability.

The table below presents the net book values of property, plant and equipment, which would have been recognised had the historical cost method been used, less grants received and negative revaluations that would be treated as an impairment equivalent, as at 31 December 2025 and 31 December 2024:

	Land	Buildings	Structures and equipment	Plant and machinery	Vehicles	Other PP&E	Construction work in progress	Total
As at 31 December 2025	125	9,628	222,046	30,330	548	3,833	14,708	281,218
As at 31 December 2024	125	8,519	225,655	32,958	4	4,225	2,320	273,806

Had the value of the Company's PP&E been not reduced by the amount of grants, the carrying amount of PP&E as at 31 December 2025 would be higher by EUR 126,698 thousand (31 December 2024: EUR 131,827 thousand). Information on grants received/receivable used to reduce the value of property, plant and equipment:

	As at 31 December 2025	As at 31 December 2024
Carrying amount at the beginning of the period	131,827	137,169
Grants used for the acquisition of fixed assets	-	(161)
Depreciation charge	(5,129)	(5,181)
Write-offs	-	-
Carrying amount at the end of the period	126,698	131,827

8. Right-of-use assets

As described below, the Company has taken on lease office premises, motor vehicles, and land. Lease periods for premises, motor vehicles and land are 5-10 years, 3 - 4 years, and 99 years, respectively. The Company assessed the probability of exercising the lease extension option when recognising right-of-use assets and lease liabilities, and when determining the lease periods.

From 1 January 2025 the Company has reviewed the value of right of use assets (office premises) for rent indexation. The rent for the office premises may be revalued based on the average change in the consumer price index in line with inflation, but may not exceed 2 per cent.

	Buildings	Land	Vehicles	Total
Net book value at 31 December 2023	1,346	1,462	292	3,100
New leases	-	-	2,076	2,076
Indexation	28	-	-	28
Write-offs	-	-	-	-
Depreciation charge	(184)	(16)	(723)	(923)
Net book value as at 31 December 2024	1,190	1,446	1,645	4,281
Initial cost	1,775	1,534	2,399	5,708
Accumulated depreciation	(585)	(88)	(754)	(1,427)
Net book value as at 31 December 2024	1,190	1,446	1,645	4,281
Net book value as at 31 December 2024	1,190	1,446	1,645	4,281
New leases	-	-	-	-
Indexation	12	-	-	12
Write-offs	-	-	-	-
Depreciation charge	(185)	(15)	(789)	(989)
Net book value as at 31 December 2025	1,017	1,431	856	3,304
Initial cost	1,787	1,534	2,399	5,720
Accumulated depreciation	(770)	(103)	(1,543)	(2,416)
Net book value as at 31 December 2025	1,017	1,431	856	3,304

9. Inventories

	As at 31 December 2025	As at 31 December 2024
Spare parts and other inventories	1,260	1,245
Natural gas	3,456	3,908
Assets held for sale	-	40
Inventories, gross	4,716	5,193
Less: impairment	(591)	(432)
Total inventories	4,125	4,761

As at 31 December 2025, the carrying amount of inventories decreased by 13%, compared to 31 December 2024. The decrease in carrying amount of inventories as at 31 December 2025, compared to 31 December 2024, was attributable to the following:

- a 12% reduction in value of natural gas inventories due to changes in natural gas prices;
- a 37% higher reduction in value of inventories made to write down the carrying amount of inventories to their net realizable value.

The acquisition cost of the Company's inventories accounted for at net realisable value as at 31 December 2025, amounted to EUR 924 thousand (31 December 2024: EUR 794 thousand). Inventory write-down allowance was included in other expenses. Inventories recognised as expenses during the reporting period amounted to EUR 15,875 thousand as at 31 December 2025 (31 December 2024: EUR 17,740 thousand).

10. Contract assets

	As at 31 December 2025	As at 31 December 2024
Accrued revenue from natural gas transmission and related services	3,663	1,220
Accrued other income	-	-
Total inventories	3,663	1,220

As at 31 December 2025 contract assets comprised accrued revenue from transmission services rendered, of which EUR 3,408 thousand was accrued revenue under the terms of the contract, obliging the buyer to pay for the committed volume of natural gas to be transmitted. As at 31 December 2024, accrued revenue from natural gas transmission and related services amounted to EUR 1,220 thousand.

The Company assessed the credit risk of the contracts, taking into account the creditworthiness of customers and historical data. Expected credit losses are considered immaterial, therefore were not recognised.

11. Trade receivables

	As at 31 December 2025	As at 31 December 2024
I. Trade receivables under contracts with customers		
I.1 Receivables after one year	-	-
Net book of receivables after one year:	-	-
I.2. Current trade receivables		
Receivables for transmission of natural gas	8,327	8,103
Receivables for natural gas	6	112
Receivables for balancing of transmission system	1,861	1,564
Receivables for other services	10	4
Less: expected credit losses for trade receivables	(10)	(23)
Trade receivables under contracts with customers	10,194	9,760
II. Trade receivables under other contracts		
Other trade receivables	2	3
Less: impairment of trade receivables	-	-
Total trade receivables under other contracts	2	3
Total trade receivable	10,196	9,763

Current trade receivables are interest free and their settlement term is typically between 7 and 30 calendar days. As at 31 December 2025, compared to 31 December 2024, trade receivables increased by 4%. Compared to December 2024, the main contributor to the increase in trade receivables in December 2025 was a 16% growth in the volume of gas transmitted.

Impairment allowance of EUR 10 thousand was established for trade receivables as at 31 December 2025 (31 December 2024: EUR 23 thousand).

The Company applies a simplified credit risk assessment approach, as required by IFRS 9, and accounts for loss allowances for lifetime credit losses from initial recognition of receivables.

To determine credit losses for receivables, the Company applies an individual assessment and a provision matrix. The loss ratio matrix is based on historical data for a period exceeding 36 months on settlements by customers. The loss ratios may be adjusted in view of macroeconomic forecasts. The loss ratios are classified into separate groups of receivables on the basis of credit risk

characteristics and overdue period. Debts of entities undergoing or in bankruptcy/liquidation are subject to a 100% expected credit loss ratio.

Expected credit losses of trade receivables as at 31 December 2025 were as follows:

	Not past due	1-30 days	31-90 days	91-180 days	181 and more days	Total:
Trade receivables assessed individually	4,123	-	-	-	-	4,123
Expected credit losses	(3)	-	-	-	-	(3)
Trade receivables assessed collectively						
State-owned companies	2,044	-	-	-	-	2,044
Loss ratio	0%	0%	0%	0%	0%	
Expected credit losses	-	-	-	-	-	-
Other entities	3,868	170	-	1	-	4,039
Loss ratio	0,04%	2,99%	5,83%	17,55%	100%	
Expected credit losses	(2)	(5)	-	-	-	(7)
Total trade receivables	10,035	170	-	1	-	10,206
Total expected credit losses	(5)	(5)	-	-	-	(10)

Expected credit losses of trade receivables as at 31 December 2024 were as follows:

	Not past due	1-30 days	31-90 days	91-180 days	181 and more days	Total:
Trade receivables assessed individually	3,619	-	-	-	-	3,619
Expected credit losses	(15)	-	-	-	-	(15)
Trade receivables assessed collectively						
State-owned companies	2,673	-	-	-	-	2,673
Loss ratio	0%	0%	0%	0%	0%	
Expected credit losses	-	-	-	-	-	-
Other entities	3,273	221	-	-	-	3,494
Loss ratio	0,04%	2,99%	5,83%	17,55%	100%	
Expected credit losses	(1)	(7)	-	-	-	(8)
Total trade receivables	9,565	221	-	-	-	9,786
Total expected credit losses	(16)	(7)	-	-	-	(23)

For the purpose of the individual assessment, in 2025, the range of expected credit losses was 0-1%, and in 2024, was 0-2.0%. Change in allowance accounted for the Company's receivables was as follows:

	As at 31 December 2025	As at 31 December 2024
Carrying amount at the beginning of the period	23	19
Impairment (reversal of impairment)	(13)	4
Carrying amount at the end of the period	10	23

12. Other financial assets at amortised cost

The Company's other financial assets comprise the following:

	As at 31 December 2025	As at 31 December 2024
Term deposits and short-term investments	-	5,815
Interest on deposits and short-term investments	-	51
Funds deposited for guarantees and deposits	750	918
Administered LNG terminal funds	-	3
Other receivables	180	33
Less: expected credit losses of other receivables	(94)	-
Total other financial assets	836	6,820

As at 31 December 2025 the Company's other financial assets comprised funds deposited for guarantees and safety deposits, and other receivables. As at 31 December 2025 EUR 94 thousand of expected credit loss were recognised for other receivables.

As at 31 December 2024 security deposits collected from the system users amounted to EUR 918 thousand, of which EUR 892 thousand was held in the form of term bank deposits. On 20 December 2024, three fixed-term deposit agreements with different maturities were concluded for storage of the deposits: EUR 575 thousand (12-month), EUR 140 thousand (6-month), and EUR 177 thousand (4-month).

The Company keeps security deposits collected from the system users, fixed term deposits and LNGT funds with credit institutions that are rated by international rating agencies as having high investment-grade ratings for long-term obligations, not lower than: Standard & Poors (A+), Moody's (Aa3) and Fitch (AA-). Given that these funds are held with reliable financial institutions and the credit risk is minimal, consequently, ECLs were not recognised for these financial assets.

13. Other non-financial assets

	As at 31 December 2025	As at 31 December 2024
Administered LNG terminal funds receivable	8,262	11,626
Grants receivable	4	-
Taxes receivable	-	221
Prepayments	1	5
Deferred expenses	805	860
Other receivables	-	-
Total other receivables	9,072	12,712

As at 31 December 2025 the administered LNGT funds receivable included an overdue amount of EUR 7,519 thousand due from Achema AB. As at 31 December 2024, the administered LNG terminal funds receivable included an overdue amount of EUR 7,632 thousand, of which EUR 7,439 thousand was due from Achema AB.

The decrease in the administered LNGT funds receivable at 31 December 2025, compared to 31 December 2024, was caused by the significantly lower extra charge related to natural gas supply security and added to the natural gas transmission tariff applicable as of 1 January 2025. In 2024, an extra charge related to natural gas supply security added to the natural gas transmission tariff was 205.93 Eur/MWh. As of 1 January 2025, an extra charge related to natural gas supply security was negative, which was set at -25.55 Eur/MWh for the period until 30 June 2025, and at -43 Eur/MWh for the period from 1 July 2025 to 31 December 2025.

The Company does not recognise impairment for the LNGT funds receivable as the Company, acting as administrator of the LNGT funds, is not exposed to credit risk. In accordance with the Description of the Procedure for Administration of LNGT funds, the LNGT funds shall not be treated as assets of the administrator of LNGT funds based, therefore, they cannot be subject to debt recovery procedures based on the obligations of the administrator of LNGT funds that are not related to the administration of LNGT funds.

14. Cash and cash equivalents

	As at 31 December 2025	As at 31 December 2024
Cash at bank	1,942	31
Total cash and cash equivalents	1,942	31

The Company keeps its cash balances on bank accounts. The cash balance as at 31 December 2025 comprised EUR 750 thousand in the account dedicated to the natural gas exchange used to pay for natural gas. The balance of cash held in bank accounts, amounting to EUR 1,178 thousand, consisted of deposits received from system users. Since the Company did not have any valid term deposit agreements as of 31 December 2025, and the use of deposit funds is not restricted for the Company, these funds are recognized as cash and cash equivalents.

The table below lists the long-term foreign currency credit ratings of the banks with which the Company kept its cash balances as at 31 December 2025:

Bank	Cash at bank at 31 December 2025	Cash at bank at 31 December 2024	Credit rating agency		
			Moody's	Standart&Poor 's	Fitch Ratings
Bank No.1 ¹⁾	9	5	Aa3	AA-	AA
Bank No.2 ¹⁾	1,933	26	Aa2	AA-	AA

¹⁾ The ratings assigned to the parent banks as at 31 December 2025.

15. Issued capital

The Company's share capital amounted to EUR 51,731 thousand and it is divided into 178,382,514 ordinary registered shares with par value of EUR 0.29 each. All shares were fully paid as at 31 December 2025 and 31 December 2024.

16. Dividends

During the Company's Ordinary General Meeting of Shareholders held on 30 April 2025, the decision was made to pay dividends in total amount of EUR 10,685 thousand, i.e. EUR 0.0599 per share.

During the Company's Ordinary General Meeting of Shareholders held on 30 April 2024, the decision was made to pay dividends in total amount of EUR 20,174 thousand, i.e. EUR 0.1131 per share.

17. Reserves

Legal reserve

A legal reserve is a compulsory reserve under the laws of the Republic of Lithuania. Annual transfers of not less than 5% of net profit are compulsory until the reserve reaches 10% of the authorised share capital.

The Company's legal reserve amounts to EUR 5,173 thousand and represents 10% of its authorised share capital.

Other reserves

Other reserves are formed by the decision of the Annual General Meeting of Shareholders regarding the proposed appropriation of profit.

When approving the proposed appropriation of profit for 2024, an unutilised reserves EUR 403 thousand were transferred back to retained earnings, a EUR 500 thousand share of profit allocated to a target reserve for support.

When approving the proposed appropriation of profit for 2023, an unutilised reserves EUR 114,430 thousand were transferred back to retained earnings, a EUR 403 thousand share of profit allocated to a target reserve for support.

The Company's profit for the development of its operations and for the implementation of strategic projects, temporarily restricting the use of profits, was accrued in other reserves. Reserves were cancelled following the achievement of the objectives for which the restrictions on the use of profits were imposed.

Revaluation reserve

Below are presented the changes in the revaluation reserve:

	As at 31 December 2025	As at 31 December 2024
Carrying amount at the beginning of the period	2,479	2,767
PP&E revaluation impact	-	-
Transfer of revaluation reserve to retained earnings	(244)	(304)
Effect of deferred income tax	39	46
Impact of a change in income tax tariff	(27)	(30)
Carrying amount at the end of the period	2,247	2,479

Pursuant to Articles 39, 42, 51 and 59 of the Law on Companies of the Republic of Lithuania, no part of the revaluation reserve may be distributed, either directly or indirectly, it may be used only to increase the issued capital. The general meeting of shareholders may not adopt a decision to pay dividends if the equity capital of the company is lower or upon payment of dividends would become lower than the revaluation reserve, i.e. the use of the revaluation reserve for profit/loss allocation is prohibited.

18. Grants

Grants comprise EU support for the acquisition of non-current assets and compensation of expenses. As at 31 December 2025 and 31 December 2024 movements in grants were as follows:

Opening balance	As at 31 December 2025	As at 31 December 2024
Grants receivable (Note 13)	-	7,360
Grants received in advance (current liabilities)	-	(10)
	-	7,350
Recognised grants		
Transfer to property, plant and equipment (Note 7)	-	-
Transfer to intangible assets (Note 6)	-	-
Write-off	-	(161)
Grants used for compensation of expenses	4	3
	4	(158)
Grants received		
Grants received as cash	-	7,192
	-	7,192
Grants received in the form of assets	-	-
Closing balance		
Grants receivable (Note 13)	4	-
Grants received in advance (current liabilities)	-	-
	4	-

19. Borrowings

As at 31 December 2025, the Company had two long-term loan agreements with the Nordic Investment Bank and the European Investment Bank.

As at 31 December 2025, borrowings from the Nordic Investment Bank amounted to EUR 10,870 thousand (31 December 2024: EUR 13,043 thousand). As at 31 December 2025, borrowings from the European Investment Bank amounted to EUR 44,443 thousand (31 December 2024: EUR 47,918 thousand).

On 1 August 2025, the Company entered into the 5-year loan agreement with EPSO-G to refinance a prior short-term loan of EUR 50,000. The long-term loan will be repaid in full at the end of the period.

To balance its working capital, on 28 August 2025, the Company entered into a cash pool contract with EPSO-G and other Group companies, setting the maximum borrowing limit (overdraft) from EPSO-G at EUR 30,000 thousand. As at 31 December 2025, the Company's borrowings under this contract amounted to EUR 17,845 thousand (31 December 2024 under the short-term loan from EPSO-G in force at the time: EUR 23,482 thousand).

As at 31 December 2025, the weighted average interest rate on the Company's borrowings was 2.36% (as at 31 December 2024: 2.25%).

As at 31 December 2025, the EUR 85,534 thousand loan was subject to a variable interest rate (31 December 2024: EUR 43,870 thousand), and a EUR 37,623 thousand loan was subject to a fixed interest rate (31 December 2024: EUR 40,574 thousand). The variable interest rate is linked to 3- 6- and 12-month EURIBOR.

The long-term loan agreements with the Nordic Investment Bank and the European Investment Bank include financial covenants, to which the Company is subject to. In the loan agreement with the Nordic Investment Bank, the said financial covenants are defined by the following performance indicators: Financial debt-to-EBITDA ratio, Net debt to RAB ratio and Net Interest Coverage Ratio.

In the loan agreement with the European Investment Bank, the said financial covenants are defined by the following performance indicators: Net debt to RAB ratio and Net Interest Coverage Ratio.

As at 31 December 2025, the Company did not comply with the net interest coverage ratio and debt-to-EBITDA ratio.

The European Investment Bank has issued the waiver letter in respect of failure to comply with the Interest Coverage Ratio covenant.

On 22 December 2025, the Nordic Investment Bank, EPSO-G and the Company entered into a tripartite loan transfer agreement by which EPSO-G takes over the loan of EUR 10,870 thousand. In addition, the Company and EPSO-G entered into intercompany loan agreement substantially on the same terms as the original loan agreement with the Nordic Investment Bank, except for financial covenants. The tripartite agreement and the internal loan had not yet come into effect as at 31 December 2025, as the European Investment Bank had not made a decision to transfer the long-term loans of the EPSO-G Group companies to the parent company.

Upon entry into force of the tripartite agreement with the Nordic Investment Bank and EPSO-G, the Company will be no longer subject to the financial covenants. Considering that the Company failed to comply with financial covenants under the original loan agreement as at 31 December 2025, the creditor, under the agreement in force as at 31 December 2025, obtains the right to demand immediate payment of the loan, in whole or in part, together with any interest accrued. For this reason, the Company reclassified the non-current portion of the loan to a current financial liability as at the reporting date. Formal enforcement of the claim for failure to meet financial covenants is effective until the date of entry into force of the tripartite agreement signed on 22 December 2025, as described above.

In addition, the long-term loan agreements with Nordic Investment Bank and European Investment Bank provides for the cross-default covenants. For this reason, the Company reclassified the non-current portion of the loan of the European Investment Bank to a current financial liability as at the reporting date. Formal enforcement of the claim for failure to meet the cross-default covenants is effective until the date of entry into force of the tripartite agreement signed on 22 December 2025, as described above.

On 25 February 2026, the confirmation was received from the Nordic Investment Bank regarding the entry into force of the tripartite loan transfer agreement concluded on 22 December 2025, with the day of entry being 25 February 2026. Upon the entry into force of this agreement, EPSO-G takes over the loan, and the financial covenants cease to apply to the Company. Along with this agreement, an internal loan agreement concluded on 22 December 2025 with EPSO-G comes into force.

As at 31 December 2024, the Company complied with the covenants and obligations set forth in the loan agreements with the above-mentioned banks.

	As at 31 December 2025	As at 31 December 2024
Non-current borrowings	50,000	55,312
Borrowings from financial institutions	-	55,312
Loan from parent	50,000	-
Current borrowings	73,666	29,482
Current borrowings from Group companies	17,845	23,482
Accrued interest on borrowings from Group (including non-current)	346	81
Current portion of non-current borrowings	55,312	5,649
Accrued interest on borrowings from financial institutions	163	270
Total borrowings	123,666	84,794

Non-current borrowings by maturity:

	As at 31 December 2025	As at 31 December 2024
Between 1 and 2 years	-	5,649
Between 2 and 5 years	50,000	16,948
After 5 years	-	32,715
Total	50,000	55,312

Contractual maturity dates of non-current borrowings, broken down by borrowings subject to fixed and variable interest rates:

	As at 31 December 2025	As at 31 December 2024	As at 31 December 2025	As at 31 December 2024
	Borrowings with a fixed interest rate	Borrowings with a fixed interest rate	Borrowings with a variable interest rate	Borrowings with a variable interest rate
2025		2,951		2,699
2026	37,623	2,951	17,689	2,699
2027		2,951		2,699
2028		2,951		2,699
2029		2,951		2,699
2030		2,951	50,000	2,699
2031		2,951		525
2032		2,951		524
2033		2,951		524
2034		2,951		524
2035		2,951		524
2036		2,951		524
2037		2,951		524
2038		2,211		524
	37,623	40,574	67,689	20,387

All borrowings of the Company were obtained in the euros, and therefore, the outstanding balances of borrowings were denominated in the euros for the period of 31 December 2025 and 31 December 2024, thereby resulting in no foreign exchange effect.

There are no third-party guarantees or assets pledged by the Company as a collateral for bank borrowings.

20. Lease liabilities

Lease liabilities and their movement were as follows:

	As at 31 December 2025	As at 31 December 2024
Carrying amount at the beginning of the period	4,478	3,250
Indexation	11	28
Concluded lease contracts	-	2,076
Terminated lease contracts (write-off of debt and accrued interest)	-	-
Interest charged	84	103
Lease payments (principal and interest)	(1,073)	(979)
Carrying amount at the end of the period	3,500	4,478
Non-current lease liabilities	2,485	3,492
Current lease liabilities	1,015	986

Future rental payments under non-cancellable lease agreements:

Lease liabilities	As at 31 December 2025	As at 31 December 2024
Current portion	1,015	986
Maturity of non-current liabilities:	2,485	3,492
Between 1 and 2 years	316	1,013
Between 2 and 3 years	196	314
Between 3 and 5 years	396	390
After 5 years	1,577	1,775

Interest charged on lease liabilities and included in the Company's finance costs amounted to EUR 84 thousand as at 31 December 2025 (31 December 2024: EUR 103 thousand).

The Company has a lease contract for office premises with variable lease payments not included in the value of lease liabilities. As from 1 January 2025, the lease rate for office premises is indexed in view of changes the average consumer price index up to a maximum of per cent. As at 31 December 2025, the Company's lease payments (principal amount) totalled EUR 989 thousand (as at 31 December 2024: EUR 876 thousand).

Company had no short-term lease contracts. In 2025, the EUR 160 thousand lease payments were recognised as expenses under low-value leases which are not part of the lease liabilities (2024: EUR 154 thousand).

21. Net debt

Net debt balances:

	As at 31 December 2025	As at 31 December 2024
Cash and cash equivalents	1,942	31
Other liquid assets	-	6,707
Non-current borrowings	(50,000)	(55,312)
Lease liabilities	(2,485)	(3,492)
Current portion of non-current borrowings	(55,312)	(5,649)
Current borrowings	(17,845)	(23,482)
Accrued interest payable	(509)	(351)
Current portion of lease liabilities	(1,015)	(986)
Net debt	(125,224)	(82,534)

Reconciliation of net debt balances and cash flows from financing activities:

	Cash	Other liquid assets	Borrowings	Lease liabilities	Total
Net debt as at 31 December 2023	121	-	(92,046)	(3,250)	(95,175)
Changes in cash and cash equivalents	(90)	-	-	-	(90)
Increase (decrease) in other liquid assets*	-	6,707	-	-	6,707
Repayment of borrowings	-	-	5,649	-	5,649
Change in overdraft	-	-	1,526	-	1,526
Lease payments	-	-	-	876	876
Concluded lease contracts	-	-	-	(2,076)	(2,076)
Indexation	-	-	-	(28)	(28)
Other changes:					
Interest charges expensed and interest capitalised	-	-	(2,235)	(103)	(2,338)
Interest paid	-	-	2,312	103	2,415
Net debt as at 31 December 2024	31	6,707	(84,794)	(4,478)	(82,534)
Net debt as at 31 December 2024	31	6,707	(84,794)	(4,478)	(82,534)
Changes in cash and cash equivalents	1,911	-	-	-	1,911
Increase (decrease) in other liquid assets*	-	(6,707)	-	-	(6,707)
Loans (received)	-	-	(50,000)	-	(50,000)
Repayment of borrowings	-	-	5,649	-	5,649
Change in overdraft	-	-	5,638	-	5,638
Lease payments	-	-	-	989	989
Concluded lease contracts	-	-	-	-	-
Indexation	-	-	-	(11)	(11)
Other changes:					
Interest charges expensed and interest capitalised	-	-	(2,235)	(84)	(2,319)
Interest paid	-	-	2,076	84	2,160
Net debt as at 31 December 2025	1,942	-	(123,666)	(3,500)	(125,224)

* In the Company's management's opinion, when analysing the net debt level for management purposes, financial debt in the calculation formula is reduced not only by cash and cash equivalents, but also by liquid assets (Note 12) consisting of highly liquid and low-risk instruments, i.e. deposits with a maturity of more than 90 days or government securities of countries with high credit ratings with a maturity of up to 360 days. The composition of the components used in the calculation of the indicator was chosen taking into account the fact that these financial instruments can be converted into cash within a very short period of time and without incurring any or insignificant financial losses.

22. Provisions

	As at 31 December 2025	As at 31 December 2024
Provisions for pension benefits to employees	797	793
Provisions for registration of special land use conditions (protected areas)	255	300
Provisions for repayment of guarantee funds	5,815	5,815
Carrying amount	6,867	6,908
Non-current provisions	707	937
Current provisions	6,160	5,971

Dynamics of provisions were as follows:

	Provisions for pension benefits to employees	Provisions for registration of protection zones	Provision for repayment of guarantee funds	Total
Carrying amount as at 31 December 2023	774	356	-	1,130
Calculated	19	-	5,815	5,834
Revised estimate	-	(49)	-	(49)
Payments made	-	(7)	-	(7)
Carrying amount as at 31 December 2024	793	300	5,815	6,908
Calculated	4	-	-	4
Revised estimate	-	(9)	-	(9)
Payments made	-	(36)	-	(36)
Carrying amount as at 31 December 2025	797	255	5,815	6,867

Provisions for pension benefits to employees

As at 31 December 2025, the Company's employee benefit obligations related to payment of one-off benefits to employees leaving the Company at retirement age amounted to EUR 797 thousand (31 December 2024: EUR 793 thousand). There are no other long-term employee benefit obligations for long-term service of employees as per the collective agreement.

The main assumptions applied for evaluation of the Company's obligations to non-current employee benefits are as follows:

	As at 31 December 2025	As at 31 December 2024
Discount rate	1.27%	0.96%
Annual employee turnover rate	7.45%	7.12%
Annual salary growth	3.00%	2.80%
Average time to retirement (years)	20.27	19.84

Provisions for registration of protection zones

The Company has obligation to register special conditions for the use of land (protection zones). As at 31 December 2025 the Company's outstanding obligation to register special conditions for the use of land (protection zones) amounted to EUR 255 thousand (31 December 2024: EUR 300 thousand).

Provisions for repayment of guarantee funds

Following the contractor's failure to perform and/or improper performance of its warranty obligations under the contract for the construction of the gas pipeline interconnection between Poland and Lithuania (GIPL), the Company has received guarantee funds of EUR 5,815 thousand under the guarantee bank guarantees provided by the contractor Alvora UAB.

In the event the contractor challenges the non-performance or improper performance of its warranty obligations in court and requests to declare the Company's claims for payment of the guarantee funds unlawful, the Company has made a provision for the expected repayment of funds received under the guarantee. More information on the legal dispute with Alvora UAB see Note 37.

23. Trade payables

	As at 31 December 2025	As at 31 December 2024
Payables for property, plant and equipment	490	969
Payables for goods and services	3,204	1,585
Payables for repairs services	-	47
Payables for natural gas	4	1,513
Payables for balancing services	1,378	2,253
Carrying amount	5,076	6,367

Trade payables are non-interest bearing and are generally collectible within 30 days. As at 31 December 2025, trade payables were by 20% lower than as at 31 December 2024 due to the decrease in payables for natural gas, balancing services and property, plant and equipment. Payments for natural gas are made through the settlement account dedicated to the natural gas exchange, maintaining the required cash balance. Payments for gas purchased on the exchange are settled on the next working day.

24. Financial liabilities at amortized cost

	As at 31 December 2025	As at 31 December 2024
Financial liabilities		
Security deposits received	1,178	918
Payable dividends	80	73
Payable CBCA contribution	-	27,450
Accrued expenses	1,524	842
Other payables	73	17
Total financial liabilities	2,855	29,300

As at 31 December 2025 financial liabilities were by 90% lower than as at 31 December 2024 due to the compensation paid to the Polish transmission system operator in 2025, as set in the Transmission System Operators Agreement (hereinafter the 'ITA Agreement') and imposed by the decision of the Agency for the Cooperation of Energy Regulators of the European Union (ACER) (hereinafter the "CBCA contribution").

As at 31 December 2025, the financial liabilities comprised EUR 1,178 thousand (31 December 2024: EUR 918 thousand) as security deposits received from the system users as a contract enforcement measure. The system user, before entering into the transmission contract, must provide the Company with appropriate contract enforcement measures.

Accrued expenses grew as a result of higher emission allowance costs linked to a 97% increase in number of mandatory emission allowances.

25. Other non-financial liabilities

	As at 31 December 2025	As at 31 December 2024
Employment-related liabilities	2,504	1,952
Accrued expenses relating to vacation reserve	1,583	1,525
Administered LNGT funds payable	8,146	10,794
Accrued administered LNGT funds	116	833
Taxes payable to the State budget	1,118	796
Fee payable to the regulator	255	278
Other prepayments received	4	29
Contract liabilities	145	89
Total other liabilities	13,871	16,296

As at 31 December 2025, other current liabilities were by 15% lower than as at 31 December 2024 due to decrease in LNGT funds payable and receivable caused by a lower extra charge related to natural gas supply security and added to the natural gas transmission tariff. Further information is disclosed for in Note 13.

26. Revenue

The Company's revenue comprises as follows:

	2025	2024
Revenue under contracts with customers		
Transmission of natural gas in the territory of Lithuania	59,426	61,195
Revenue from system balancing products	9,869	12,879
Revenue from connection of new consumers (deferred revenue)	108	76
Other income	64	35
Total revenue from contracts with customers	69,467	74,185
Revenue other than under contracts with customers	-	-
Revenue from administration of LNG terminal funds	111	125
Total revenue other than under contracts with customers	111	125
Total revenue	69,578	74,310

	2025	2024
<i>Revenue recognised over the period</i>		
Transmission of natural gas in the territory of Lithuania	59,426	61,195
Revenue from system balancing products	9,869	12,879
Other income	283	236
Total revenue recognised over the period	69,578	74,310
<i>Revenue recognised at a point in time, upon provision of services</i>	-	-
Total revenue recognised at a point in time, upon provision of services:	-	-
Total revenue under contracts with customers	69,578	74,310

Compared to 2024, revenue from natural gas transmission and related services decreased by 6% in 2025. This drop was due to the lower natural gas transmission price. Compared to 2024, revenue from system balancing were lower by 23% due to a 35% decrease in the demand for balancing gas.

27. Other income

The Company's other income includes as follows:

	2025	2024
Grants recognised as income	4	4
Income from sales of inventories and reversible substances	23	4
Rental income	11	8
Gain on disposal of PP&E	1	2
Interest on late payment	57	39
Other income	42	216
Total other income	138	273

28. Purchases of natural gas

Natural gas costs comprised the following:

	2025	2024
Expenses for natural gas system balancing products	(9,869)	(13,079)
Expenses for natural gas technological needs	(5,183)	(3,430)
Total*	(15,052)	(16,509)

* Expenses include impact of changes in gas inventory balances.

In 2025, compared to 2024, expenses for natural gas decreased by 9%. In 2025, expenses for balancing products decreased by 25% due to a lower demand for balancing gas. In 2025, expenses for technical needs increased by 51% due to a 38% higher volume of gas for technological needs and cost of gas.

29. Wages and salaries, and related expenses

Wages and salaries, and related expenses comprised the following:

	2025	2024
Wages and salaries	16,985	15,227
Social security contributions	305	274
Total wages and related costs:	17,290	15,501

30. Other expenses

The Company's other expenses comprised the following:

	2025	2024
Telecommunications and IT system expenses	(2,557)	(2,263)
Business trips	(364)	(304)
Consulting services	(92)	(334)
Expenses of governing bodies	(117)	(104)
Management services	(767)	(760)
Personnel development	(269)	(222)
Public relations	(240)	(177)
Premise expenses	(779)	(740)
Transport	(856)	(791)
Council fee	(1,018)	(1,111)
Taxes (charges payable to the State and Municipal budgets)	(3,488)	(3,314)
Business protection	(817)	(583)
Membership fees	(296)	(258)
Insurance	(499)	(532)
Change in value of variable payments	(1,304)	-
Emission allowances	(1,289)	(533)
Occupational health and safety expenses	(173)	(154)
Other expenses	(1,605)	(1,261)
In total:	(16,530)	(13,441)

The CBCA contribution, calculated in accordance with cross-border cost allocation principles, was recognized as a variable payment. Upon initial recognition, the CBCA contribution was included in the acquisition cost of the PPE. The additional portion of the CBCA contribution, representing a change in the value of variable payments, was recognized in the statement of comprehensive income under other expenses at the time of payment.

31. Other gain (loss)

Other gain (loss) consisted of the following:

Other gain (loss)	2025	2024
Gain/loss on disposal of associate, net	1,051	-
Change in fair value of options	(873)	(363)
Other gain (loss)	178	(363)

Disposal of investments in associate

On 31 May 2023, following the sale of 66% shares in GET Baltic and transfer of the control in GET Baltic, the remaining 34% of the investment in GET Baltic was measured at fair value before the disposal, and subsequently accounted for using the equity method. Upon fulfillment of contract liabilities by the strategic investor, on 10 October 2025, the Company disposed the remaining 34% shareholding in GET Baltic, thereby losing significant influence over the associate. As of the date, the equity method is no longer applied to the investment in the associate.

The carrying amount of investments in associate at the time when the disposal was EUR 3,147 thousand. The following are the changes in carrying amount of the investment in associate:

	As at 10 October 2025	As at 31 December 2024
Opening carrying amount	3,560	3,644
Acquisition	-	-
Associate's net profit (loss)	424	480
Associate's other comprehensive income	-	-
Dividends received	(837)	(564)
Write off on disposal	(3,147)	-
Closing carrying amount	-	3,560

The share purchase/sale agreement of 31 May 2023 comprised share options that are designated as a financial instrument. Before exercise of the options, they were measured at fair value. Upon satisfying the terms of the option contract, the Company disposed the remaining portion of the investment. The fair value of the options was incorporated in the gain (loss) on disposal of investment. After exercising options, the Company has no rights or obligations under the option contracts.

The following is the impact of individual items on the assessment of the net result of the share disposal transaction:

Gain/loss on disposal of associate, net	
Consideration from disposal of investment in associate	3,824
Carrying amount of investment in associate	(3,147)
Impact of options exercised	374
Gain (loss) on disposal of associate	1,051

Derivatives

On 10 October 2025, upon fulfillment of contract liabilities by the investor, GET Baltic's share options were exercised. The options were related to the disposal of the remaining shareholding and had impact on the final transaction price. The options give the right to sell/buy the remaining shares in GET Baltic at a fixed price, by managing price risk due to potential value changes of the associate prior to closing. The options were recognised as stand-alone derivatives and, given the likely option exercise period, were classified as assets or liabilities of particular duration. The share options were measured at fair value.

Information on the changes in fair value of derivatives:

	2025	2024
Non-current assets		
Opening carrying amount	1,153	1,226
Change in fair value	(1,143)	(73)
Included in net gain (loss) on disposal	(10)	-
Closing carrying amount	-	1,153

	2025	2024
Current liabilities		
Opening carrying amount	(654)	(364)
Change in fair value	270	(290)
Included in net gain (loss) on disposal	384	-
Closing carrying amount	-	(654)

Changes in the fair value of options before their exercise were recognised in the statement of profit or loss under gain (loss) on derivatives. Before exercise of the options, the change in the fair value of derivatives of EUR 873 thousand was recognised in the statement of profit or loss for 2025 (the EUR 1,143 thousand loss due to decrease in value of put option, and the EUR 270 thousand gain due to decrease in value of call option). The change in the fair value of derivatives of EUR 363 thousand was recognised in the statement of profit or loss for 2024 (the EUR 73 thousand loss due to decrease in value of put option, and the EUR 290 thousand loss due to increase in value of call option). The value of options which increased a net gain or loss on disposal was EUR 374 thousand.

32. Financing activities

	2025	2024
Interest income	178	186
Other finance income	-	-
Total finance income	178	186
Interest costs	(2,154)	(2,345)
Other finance costs	(88)	-
Total finance costs	(2,242)	(2,345)
Total finance costs, net	(2,064)	(2,159)

33. Current and deferred income tax

Income tax expenses include as follows:

	2025	2024
Current income tax expense for the reporting year	380	1,071
Deferred income tax expenses (benefit)	(575)	125
Income tax expenses/(benefit) for the reporting period	(195)	1,196

The movement in deferred tax assets and liabilities prior to offsetting the assets and liabilities balances with the same fiscal authority was as follows:

	PP&E revaluation (impairment)	Fees on connection of new consumers	Impairment of inventories and receivables	Accrued expenses	Unutilised investment incentive	Lease liabilities	Other	Total
Deferred tax asset								
As at 31 December 2023	3,410	240	80	364	448	465	201	5,208
Recognised in profit or loss	190	5	(7)	7	(448)	220	106	73
Recognised in other comprehensive income	-	-	-	-	-	-	-	-
As at 31 December 2024	3,600	245	73	371	-	685	307	5,281
Recognised in profit or loss	181	3	30	34	-	(90)	279	437
Recognised in other comprehensive income	-	-	-	-	-	-	-	-
As at 31 December 2025	3,781	248	103	405	-	595	586	5,718

	Effect of capitalisation of interest	PP&E depreciation	PP&E revaluation	Right-of-use assets	Total
Deferred tax liabilities					
As at 31 December 2023	(169)	-	(488)	(465)	(1,122)
Recognised in profit or loss	(7)	(17)	46	(220)	(198)
Recognised in other comprehensive income	-	-	(30)	-	(30)
As at 31 December 2024	(176)	(17)	(472)	(685)	(1,350)
Recognised in profit or loss	(20)	(4)	39	123	138
Recognised in other comprehensive income	-	-	(27)	-	(27)
As at 31 December 2025	(196)	(21)	(460)	(562)	(1,239)

	As at 31 December 2025	As at 31 December 2024
Deferred tax asset before offset	5,718	5,281
Less: deferred tax liabilities	(1,239)	(1,350)
Deferred tax asset, net	4,479	3,931

Deferred income tax, net, as at 31 December 2023	4,086
Deferred income tax, net, as at 31 December 2024	3,931
Deferred income tax, net, as at 31 December 2025	4,479

Under the assessment of the Company EUR 314 thousand net deferred income tax will be realized within 12 months, EUR 4,165 thousand over a period of more than 12 months.

When estimating the components of deferred tax assets and liabilities as at 31 December 2025 the Company applied income tax rate of 17 % and 16% as at 31 December 2024.

Deferred tax assets and deferred tax liabilities were offset in the Company's statement of financial position, as they were related to the same tax authority.

The reported amount of current income tax expense can be reconciled to the income tax expense that would result from applying statutory income tax rates to profit before taxation:

	2025	2024
Profit (loss) before tax	1,165	9,502
Income tax at the effective income tax rate	186	1,425
Effect of non-taxable income	(288)	(65)
Effects of non-deductible expenses	186	121
Investment incentive utilised during the reporting period	-	(10)
Impact of a change in the corporate income tax rate	(291)	(275)
Other	(50)	-
Adjustments to previous year income tax	62	-
Income tax expense (benefit)	(195)	1,196

34. Basic and diluted earnings per share

Basic and diluted earnings (loss) per share reflect net profit (loss) divided by the weighted average number of shares. There are no diluting instruments, therefore, the basic and diluted earnings (loss) per share are the same. Calculation of basic and diluted earnings (loss) per share is presented below:

	2025	2024
Net profit attributable to equity holders of the Company (EUR '000)	1,360	8,306
Weighted average number of shares ('000 units)	178,383	178,383
Basic and diluted earnings (loss) per share (EUR)	0.01	0.05

35. Financial assets and liabilities and risk management

The Company is exposed to financial risks in its operations. In managing these risks, the Company seeks to mitigate the effect of factors that might have negative impact on its financial performance. The Company follows the Group's Treasury and Financial Risk Management Policy.

Financial instruments by category based on the items of the statement of financial position:

Financial assets	Note	As at 31 December 2025	As at 31 December 2024
Financial assets at fair value through profit or loss		-	1,153
Derivatives	31	-	1,153
Financial assets at amortised cost		12,974	16,614
Trade receivables	11	10,196	9,763
Cash and cash equivalents	14	1,942	31
Other financial assets at amortised cost	12	836	6,820
Total financial assets:		12,974	17,767

Financial liabilities	Note	As at 31 December 2025	As at 31 December 2024
Financial liabilities at fair value through profit or loss		-	654
Derivatives	31	-	654
Financial liabilities measured at amortised cost		135,097	124,939
Borrowings	19	123,666	84,794
Lease liabilities	20	3,500	4,478
Trade payables	23	5,076	6,367
Other financial liabilities at amortised cost	24	2,855	29,300
Total financial liabilities:		135,097	125,593

Liquidity risk

Liquidity risk is managed continuously by making short-term and long-term cash flow forecasts of the Company. Where necessary, the Company relies on the forecasts to make decisions aimed at ensuring its solvency, i.e. to balance its working capital, the Company uses the borrowing limit set under the cash pool agreement with the EPSO-G Group companies participating in the cash pooling arrangement. Balance of undrawn credit limit as at 31 December 2025 was EUR 12,155 thousand (as at 31 December 2024, EUR 46,518 thousand).

The Company does not guarantee obligations of other parties.

The Company's liquidity ratios as at 31 December 2025 and 2024, respectively, were as follows:

	As at 31 December 2025	As at 31 December 2024
Current ratio	0,29/(0,56*)	0,39
Quick ratio	0,25/(0,48*)	0,34

The decrease in liquidity ratios was due to an increase in current liabilities as a result of the Company's reclassification of long-term loans from the Nordic Investment Bank and the European Investment Bank into current financial liabilities during the reporting period. More detailed information on the reclassification of loans is provided in Notes 19 and 40.

* When preparing the financial statements, the long-term portion of Nordic Investment Bank and the European Investment Bank loans was temporarily classified as short-term financial debt. Therefore, we present a restated figure assuming that the portions of Nordic Investment Bank and the European Investment Bank loans temporarily reclassified as current loans are treated as long-term financial liabilities.

The table below presents the Company's financial liabilities grouped by maturity as at 31 December 2025 and 2024, based on the undiscounted contractual payments (scheduled payments including interest):

	Up to 3 months	Between 3 and 12 months	Between 1 and 5 years	After 5 years	Total
Interest-bearing borrowings and liabilities	2,575	28,143	25,200	34,080	89,998
Lease liabilities	267	803	1,835	2,873	5,778
Other financial liabilities	29,300	-	654	-	29,954
Trade payables	6,367	-	-	-	6,367
Balance as at 31 December 2024	38,509	28,946	27,689	36,953	132,097
Interest-bearing borrowings and liabilities	73,381	1,699	56,367	-	131,447
Lease liabilities	261	802	998	2,655	4,716
Other financial liabilities	1,485	1,289	81	-	2,855
Trade payables	5,076	-	-	-	5,076
Balance as at 31 December 2025	80,203	3,790	57,446	2,655	144,094

Credit risk

The table below summarises credit risk exposures related to the balance sheet items:

	As at 31 December 2025	As at 31 December 2024
Financial assets at fair value through profit or loss	-	1,153
Financial assets at amortised cost	11,032	16,583
Cash and cash equivalents	1,942	31
Contract assets	3,663	1,220
	16,637	18,987

The maximum exposure to credit risk is equal to the amount of trade receivables, other receivables (except for receivable LNG terminal funds), cash and other financial assets, less recognised impairment losses. Delays in settlement of trade receivables may affect the Company's ordinary course of business and lead to search of additional financing sources. Credit risk is managed through regular monitoring procedures (individual supervision of debtors, monitoring and analysis of customers in order to identify potential solvency issues that may arise in the future, etc.). The Company has approved the Description of Administration of Payments for the Transmission Services, which stipulates the specific actions and deadlines to be followed in order to reduce the outstanding balance of trade receivables. Creditworthiness of all customers is assessed, and in case of any deviations from the criteria set out in the Description of Administration of Payments for the Transmission Services, the risk is assessed individually in respect of creditworthiness of each customer, and, if necessary, additional credit enhancements are ensured to eliminate such risk.

The credibility of the selected partners is assessed according to the procedure established at the Company. The system users assigned with the highest risk level are assessed by engaging an entity that provides specialised creditworthiness assessment services.

The Company is exposed to significant concentration of credit risk. The credit risk exposure is distributed among the Company's 10 major customers with trade receivables from them representing 83% of the Company's total trade receivables as at 31 December 2025 (31 December 2024: 86%).

The Company's exposure to credit risk arises from cash at bank. The level of exposure depends on the credibility of the selected bank (Note 14). The Group has an effective treasury and financial risk management policy in place. The policy establishes the credibility level of the banks selected for partnership; the diversification limits for funds kept as deposits or invested in the investment products of banks or their subsidiaries, other securities, etc.

Interest rate risk

The Company is exposed to interest rate risk arising mainly non-current and current borrowings from the parent EPSO-G, as well as non-current borrowings from financial institutions, partly linked to variable interest rates. Interest rate fluctuations may have impact on the Company's finance costs, cash flows and performance. Given the Company's infrastructure and regulated activities, interest rate risk is a significant financial risk factor, subject to ongoing monitoring.

The Company's interest rate risk management is aimed at ensuring stable and predictable finance costs and reducing the negative impact of interest rate fluctuations on the Company's performance. Risk is managed through a diversified funding structure, combining fixed and variable rate commitments. The interest rate risk management complies with the provisions of Treasury and Financial Risk Management Policy approved by the Group, considering regulatory developments.

As at 31 December 2025, the Company's variable rate loans totalled EUR 85,534 thousand (EUR 43,870 thousand as at 31 December 2024).

The table below demonstrates the sensitivity of the Company's profit before tax to theoretic potential shifts in EURIBOR interest rates, with all other variables held constant. The Company estimates sensitivity using 100 basis points, which make 1%.

	Increase in EURIBOR, b.p.	Impact on profit before tax, EUR '000
As at 31 December 2025	100	(855)
As at 31 December 2024	100	(439)

There is no impact on the Company's equity, other than that on current year profit. The increasing or decrease in interest rate by +/- 1 pp would result in decrease/increase the Company's pre-tax profit by EUR 855 thousand as at 31 December 2025 (2024: decrease/increase in pre-tax profit by EUR 439 thousand).

Natural gas price risk

The Company is exposed to a risk arising from changes in the natural gas purchase price. The changes are driven by fluctuations in Lithuanian and international natural gas markets and exchanges. The risk is low, since the methodology for determining the tariffs of transmission services approved by NERC accepts actual gas prices.

Fair value of financial assets and liabilities

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

The Company's major financial assets and liabilities not carried at fair value are trade and other receivables, trade and other payables, current and non-current loans granted and borrowings and finance lease.

The following methods and assumptions are used by the Company to estimate the fair value of each class of financial instruments:

- The carrying amount of current trade and other amounts receivable, current trade and other amounts payables approximates their fair value (level 3);
- The fair value of non-current loans received and granted is measured using the interest rate for the same or similar issues or on the current rates available for debt with the same maturity profile and similar credit risk. The Company estimated that the carrying amount of interest-bearing long-term loans received was EUR 9,052 thousand as at 31 December 2025 (EUR 9,512 thousand as at 31 December 2024).

36. Consideration of climate change impact

According to the Company's management, more stringent EU environmental policy requirements introduced in the context of combating climate change, promotion and development of renewable energy sources and more efficient use of energy will reduce consumption of natural gas for both energetic and industrial domestic needs. However, natural gas plays and will continue to play an important role as a transitional energy source in achieving European and national targets of reducing greenhouse gas (GHG) emissions. We see the transformation of the energy sector as a fundamental change. In the Company's strategy, we have set ourselves the goals: to provide the infrastructure upon which the net-zero energy system will be based, to reduce GHG emissions throughout its value chain, aiming for net-zero and thereby mitigating the environmental impact of operations.

To significantly reduce the impact on environment, the plan of measures has been developed and consistently implemented: pilot projects are planned, market analysis is carried out, and investment plans are developed. Actions are focused on preparing for the new EU legal framework for methane emissions.

Measures for mitigating climate change and reducing GHG emissions and related investments are covered by the Company's Ten-Year Network Development Plan (2024-2033).

Once implemented, these investments will be included in the regulated asset base, thereby ensuring additional income and economic benefit to the Company. These investments encompass the generation of new assets and the replacement of existing depreciated assets (see Note 6,7) to increase efficiency of the transmission network and sustainability. There are no plans to reduce the useful life of the existing assets or to write off the regulated assets, and there are no evidences of impairment. More details on the impairment test performed are disclosed in Note 7.

In the view of the Company's management, the requirements related to climate change do not cast significant uncertainties and doubts on the ability to continue as a going concern, and the reasonableness and effectiveness of the environmental mitigation measures. Climate-related risk does not affect the Company's exposure to expected credit losses. The climate change impact assessments and assumptions do not pose a significant risk of material adjustments to the carrying amounts of assets and liabilities, or of impairment of non-current assets and inventories. Climate-related matters do not have a material impact on the recognition of deferred tax assets, the materialisation of contingent liabilities arising from climate change requirements, market and liquidity risk.

For more information on the climate impact see Management Report for 2025.

37. Off-balance sheet commitments and contingencies

Litigations

Below is information on pending civil cases:

1. Civil case, in which the Company is the defendant, is pending on the claim of the claimant Alvora UAB, by which it request the Court to declare the claims of the defendant, i.e. the Company, for the payment of EUR 4,598 thousand on the basis of the guarantee obligations unlawful and unfounded, and the Company's claim (treated as a counterclaim), by which it request Alvora UAB to be ordered to pay EUR 4,820 thousand by way of damages, in addition to default interest on the awarded amount, and a fine for improper performance of the contract. The case is currently pending before the Court of First Instance. The Company has received EUR 5.815 thousand in warranty performance security funds based on the claims submitted. However, a provision for the possible repayment of the same amount has been recognized in the provision account for a possible return of the guarantee funds. The Company considers that the bank guarantees were used duly in accordance with laws and terms and conditions of the contract, as defects were found in the work, which Alvora UAB refused to remedy. The proceeds from the guarantees will be used to remedy the defects found. In the event Alvora UAB remedies the defects found at its own expense until the outcome of the proceedings, the Company will reimburse the money to the claimant Alvora UAB received under the guarantees. The court has declared the case material non-public. As indicated above, the Company has made the provision of EUR 5,815 thousand (Note 22) for potential repayments of funds received under the guarantee. The Company has not recognised contingent assets to cover additional losses in the action due to the high uncertainty of the outcome of the legal proceedings.

2. In the administrative case, the Company is challenging in court two decisions adopted by the National Energy Regulatory Council (NERC) following a non-routine inspection of the legality of the use of the GIPL pipeline interconnectors during construction and testing during operation: (i) Resolution approving the Inspection Report (hereinafter -the 'Report'), finding the infringements by the Company and imposing related obligations on the Company (including the replacement of the fittings found by the Report to be unsuitable); and (ii) Resolution finding that the Company has committed an infringement of a regulatory obligation and imposing a EUR 81 thousand fine. The Company seeks to prove that it did not commit the infringements of the regulated activities identified by NERC (the infringements were committed by the contractor for the construction of the GIPL gas pipeline) and there were no grounds for imposing the sanction. Notwithstanding the fact that the Company has not paid the fine imposed, because it is challenging NERC's decision to impose a penalty, the Company has acknowledged its financial obligation to pay a set amount of the fine, which has been recognised under other payables and liabilities. If the Company's submissions are rejected by the Court or upheld in part, the sanction will remain the same or will be reduced. The administrative proceedings were suspended by the court order until the final judgement in the said civil case becomes effective (see point 2). The court has declared the case material non-public.

3. Civil case based on Latvenergo AS's claim against the Company for EUR 102 thousand in compensation for the inability to use paid transmission services due to technical maintenance work performed by the Company in 2022–2023, as well as for the award of EUR 6 thousand in late payment interest. The Company disagrees with the claim. The case is pending before the Court of First Instance.

4. Civil case pursuant to UAB Deforta's claim against the Company for compensation of EUR 349 thousand losses (lost income), because the Company unlawfully excluded it from the public procurement tender for the cleaning of main gas pipeline routes from vegetation and declared another supplier the winner, as a result of which UAB Deforta lost the right to perform the contract. The Company disagrees with the claim. The case is pending before the Court of First Instance.

Commitments to acquire non-current assets

As at 31 December 2025, the Company had off-balance sheet contractual commitments to acquire non-current assets for the amount of EUR 30.9 million (31 December 2024: EUR 3.8 million).

38. Related-party transactions

Disclosure includes transactions and their balances with the EPSO-G group companies, associate GET Baltic UAB (until 10 October 2025), all state-owned enterprises or entities under significant influence of the State (transactions with such entities are disclosed separately only if the amount of the transactions exceeds EUR 100,000 per calendar year), management and their close family members.

The Company's related parties as at 31 December 2025 and 31 December 2024 were as follows:

- The Company's parent company EPSO-G UAB, which is wholly owned by the Lithuanian Ministry of Energy;
- EPSO-G Group companies:
 - Litgrid AB (common shareholders);
 - TETAS UAB (common shareholders);
 - Baltpool UAB (common shareholders);
 - Energy Cells UAB (common shareholders);
 - EPSO-G Invest UAB (common shareholders).
- Associate GET Baltic until 10 October 2025.
- The companies of Ignitis Grupė AB:
 - Energijos Skirstymo Operatorius AB
 - Ignitis UAB
 - Ignitis Gamyba UAB
 - Transporto Valdymas UAB
 - Ignitis Polska sp. z.o.o.
 - Other companies of Ignitis Grupė AB.
- Other state-owned enterprises:
 - KN Energies AB;
 - Other state-owned enterprises or entities under significant influence;
 - Management.

Transactions with related parties are carried out under market conditions, in line with the tariffs approved under relevant legal acts or in accordance with the requirements of the Law on Public Procurement.

The nature of the Company's related-party transactions is associated with the provision of natural gas transmission services and the natural gas system users balancing services. Payments for natural transmission and balancing services under the contracts are settled within 14-17 calendar days. Security deposits are used as an enforcement measure to secure settlement.

The following other services were acquired from related parties:

- Electricity transmission services (Energijos skirstymo operatorius AB).
- Acquisition of electricity for charging electric vehicles (Ignitis UAB).
- Trading in natural gas on exchange (GET Baltic UAB).
- Management services, loans received, interest on loans received (EPSO-G).

The tables below present the Company's related-party transactions and their balances as at 31 December 2025 and 31 December 2024:

As at 31 December 2025

	Purcha- ses	LNG terminal funds deducted*	Sales	LNG terminal funds credi- ted*	Recei- vables	LNG terminal funds receivable	Proceeds from borrowing s	Payable s	LNG terminal funds payable	Divi- dends received	Finance costs
GET Baltic UAB	10,376	-	4,187	-	-	-	-	-	-	837	-
EPSO-G	766	-	-	-	-	-	67,845	594	-	-	1,483
TETAS UAB	1	-	-	-	-	-	-	-	-	-	-
Ignitis gamyba AB	5,142	-	7,463	(1,426)	384	-	-	126	180	-	-
Energijos skirstymo operatorius AB	368	-	361	(23)	19	-	-	63	3	-	-
Ignitis UAB	4,592	(436)	11,087	(1,029)	1,641	254	-	626	3,676	-	-
KN Energies AB	-	(3,677)	-	-	-	373	-	-	3,975	-	-
Other state-owned enterprises	72	-	-	-	-	-	-	3	-	-	-
	21,317	(4,113)	23,098	(2,478)	2,044	627	67,845	1,412	7,834	837	1,483

* The credited and deducted LNG terminal funds are not presented in the statement of profit or loss, as the Company acts as an agent in respect of these funds when collecting and allocating these funds. The amounts are negative due to an extra charge related to natural gas supply security added to the natural gas transmission tariff which was set negative for 2025.

As at 31 December 2024

	Purcha- ses	LNG terminal funds deducted*	Sales	LNG terminal funds credi- ted*	Recei- vables	LNG terminal funds receivable	Proceeds from borrowing s	Payable s	LNG terminal funds payable	Divi- dends received	Finance costs
GET Baltic UAB	17,616	-	2,128	-	228	-	-	1,516	-	564	-
EPSO-G	751	-	-	-	-	-	23,482	274	-	-	1,084
TETAS UAB	4	-	-	-	-	-	-	-	-	-	-
Ignitis gamyba AB	1,547	-	5,152	8,568	1,014	864	-	315	-	-	-
Energijos skirstymo operatorius AB	424	-	532	150	29	15	-	39	-	-	-
Ignitis UAB	4,163	31,797	12,312	7,047	1,650	733	-	768	6,817	-	-
Transporto valdymas UAB	52	-	-	-	-	-	-	-	-	-	-
KN Energies AB	-	-	-	-	-	-	-	-	3,975	-	-
Other state-owned enterprises	62	-	-	-	-	-	-	7	-	-	-
	24,619	31,797	20,124	15,765	2,921	1,612	23,482	2,919	10,792	564	1,084

* The credited and deducted LNG terminal funds are not presented in the statement of profit or loss, as the Company acts as an agent in respect of these funds when collecting and allocating these funds.

There were no guarantees issued or received for payables to/receivables from related parties, the settlement term was between 15 and 30 days. As at 31 December 2025, the Company neither formed nor recognised any impairment provisions for receivables from related parties.

Payments to key management personnel	2025	2024
Employment-related payments		784
Payments to Board members		99
Total compensation to management	865	883

The management of the Company is deemed to include the Company's manager, the Technical Director, the Legal and Administration Director, the Commerce Director, the Organisational Progress Director, and the Finance Director. No loans, guarantees were issued nor were any assets transferred to the management of the Company.

39. Audit and non-audit services

In the period of from 2024 to 2025 the audit firm provided the following audit and non-audit services to the Company. Information on non-audit services is disclosed based on the date of services rendered:

	2025	2024
Audit services	75	75
Total audit services	75	75
Non-audit services		
Assurance and other related services	17	12
Other services	-	5
Total non-audit services:	17	17

Audit expenses are recorded in the statement of comprehensive income under other expenses.

40. Events after the end of the financial year

On 25 February 2026, the confirmation was received from the Nordic Investment Bank regarding the entry into force of the tripartite loan transfer agreement concluded on 22 December 2025, with the day of entry being 25 February 2026. Upon the entry into force of this agreement, EPSO-G takes over the outstanding loan, and the financial covenants cease to apply to the Company. The internal loan will be classified as non-current borrowing (matures by August 2030).

At the same time, the loan from the European Investment Bank, which was reclassified to current financial liabilities as at 31 December 2025, will be reclassified to non-current financial liabilities upon entry into force of the internal loan from EPSO-G.

CONFIRMATION OF RESPONSIBLE PERSONS

24 March 2026

Following the Law on Securities of the Republic of Lithuania and the Rules on Information Disclosure of the Bank of Lithuania, we, Nemunas Biknius, Chief Executive Officer of AB Amber Grid, Gytis Fominas, Chief Financial Officer of AB Amber Grid and Head of accounting Rasa Baltaragienė of AB Amber Grid, hereby confirm that, to the best of our knowledge, the attached AB Amber Grid financial statements, for the year, ended 31 December 2025, prepared in accordance with International Financial Reporting Standards adopted by the European Union, give a true and fair view of the AB Amber Grid assets, liabilities, financial position, profit and cash flows. AB Amber Grid management report for 2025 year gives a true and fair view of business developments and operating activities and AB Amber Grid situation including a survey report of the principal risks and uncertainties.

Chief Executive Officer

Nemunas Biknius

(The document is signed with a qualified electronic signature)

Chief Financial Officer

Gytis Fominas

(The document is signed with a qualified electronic signature)

Head of accounting

Rasa Baltaragienė

(The document is signed with a qualified electronic signature)