

CLOSED – END INVESTMENT COMPANY INTENDED FOR INFORMED INVESTORS UAB “ATSINAUJINANČIOS ENERGETIKOS INVESTICIJOS”

Partner Code of Conduct

Purpose

UAB “Atsinaujinančios energetikos investicijos“, closed-end investment company intended for informed investors together with its affiliates (hereinafter - AEI) are devoted to conducting the business in an ethical, legal, and socially responsible way. AEI engages with its suppliers, contractors, subcontractors, advisers and other business partners (hereinafter- Partners) to share this commitment and, therefore, has established this Partner Code of Conduct (hereinafter - PCOC). Even though, there might be differences in legal and cultural requirements applicable to the company’s suppliers, AEI partners must comply with this PCOC in order to do business with the organization or any of its subsidiaries.

This PCOC is aligned with the United Nations (UN) Global Compact 10 Principles, EBRD Performance requirements and other internationally recognized standards. PCOC supports our commitment to the UN Sustainable Development Goals (SDGs) addressing the wicked problems of sustainability. We enable partners to maintain policies, procedures, and practices to address these topics. We also encourage our partners to implement efficient management systems, utilizing the internationally recognized standards.

Policy

Compliance with Laws and Regulations. AEI partners must operate in full compliance with the applicable laws, rules, regulations, codes and ethical standards of the countries and localities in which they operate or where they provide products or services. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, social, ethics, and labor practices. When applicable, AEI partners must forward these requirements to their suppliers.

Policies and Procedures. Partners must comply with the AEI published policies and procedures, including, but not limited to, Code of Conduct, Remuneration policy, Biodiversity policy, Environmental and Social policy. Partners should always consent to and comply with the latest version of PCOC and other updated documentation of AEI.

Labor Practices and Human Rights. Our partners must respect and support the protection of human rights of their workers and others affected by their activities.

Partner will **not employ forced labor**, which consists of work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers involuntary or compulsory labor, such as indentured labor, bonded labor or similar labor-contracting arrangements, or trafficked persons.

Partner will **not employ children** in a manner that is economically exploitative or is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral, or social development. Young people below the age of 18 will be identified and will not be employed in hazardous work. All work of persons under the age of 18 shall be subject to an appropriate risk assessment and regular monitoring of health, working conditions, and hours of work.

Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

Partner shall comply with applicable laws relating to **wages and benefits** (including minimum wages, overtime pay/rate, equal remuneration and legally mandated benefits).

Partner shall **treat all workers with respect and dignity** and ensure that they are protected from harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment.

Partner shall **not engage in, or support harassment or discrimination** based on race, gender, age, sexual orientation, gender identity and expression, ethnicity or national, social or indigenous origin, citizenship, language, disability, pregnancy, religion or belief, political affiliation, union or association membership, covered veteran status, medical conditions, protected genetic information, marital or family status in hiring and employment practices.

Partners shall respect the right of their workers to form and join **trade unions** of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.

Health and Safety Practices. Partners shall provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities. We expect our Partners to implement the health and safety management system.

Partners shall **identify and assess workplace hazards** (e.g., chemical, electrical, and other energy sources, fire, vehicles, and fall hazards) and control these through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and training.

Partner shall identify, evaluate, and be prepared for **emergency situations** by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

Partner shall ensure that procedures and systems are set up to prevent, manage, track and report **occupational injury and illness**.

Partner workers' **exposure** to chemical, biological and physical agents shall be identified, evaluated, and controlled according to the local regulations and laws.

Partner shall ensure that **production** and other **machinery** are evaluated for safety hazards.

Partner shall provide workers with **access** to hygienic toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Partners shall provide workers with appropriate workplace health and safety **information** and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.

Environmental Practices. Partners shall minimize the adverse environmental impacts of their operations, products, and services.

All required **environmental permits** (e.g., discharge monitoring), **approvals** and **registrations** are to be obtained, maintained and kept current and their operational and reporting requirements shall be followed.

Partner shall **optimize its consumption of natural resources**, including fossil fuels, water, minerals, and forest products by conserving these or by practice such as modifying production, maintenance and facility processes, materials substitution, reuse, conservation, recycling or other means.

Chemicals, waste, and other materials posing a hazard to humans, or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

Partner shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (**non-hazardous**).

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge.

Partner shall implement a **water management program** that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination.

Partners must identify, monitor, and minimize relevant **greenhouse gas (GHG) emissions and energy consumption** from their operations.

Ethical Practices. Partners shall conduct their activities in accordance with the highest standard of ethical behavior and in accordance with applicable laws and regulations.

Partner shall uphold the highest standards of integrity in all business interactions. Partners shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion, and misuse.

Partners must avoid actual, potential or perceived **conflicts of interest** with AEI employees.

All business dealings should be transparently performed and accurately reflected on Partner's **business records**.

Partners shall conduct their business in **full compliance with fair competition laws** and disclose information regarding business activities, structure, financial situation and performance in accordance with applicable laws.

Partner shall implement and maintain programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers.

Partners (including affiliates) and their activities shall not be the subject to the sanctions or restrictive measures provided for in Council Regulation (EU) No 833/2014, 269/2014 and 765/2006, as last amended, and the Parties shall comply with applicable European Union and international legislation relating to export control law, sanction law or embargo law, to the extent not inconsistent with mandatory provisions of national or European Union law.

Management System. Partners should develop, maintain and implement policies consistent with the PCOC and maintain appropriate management systems and documentation to demonstrate compliance with PCOC.

Cooperation. AEI reserves the right to request additional information, as well as to monitor and verify compliance with the principles of this PCOC and to terminate business relationships with the Partners who violate this PCOC. We expect that Partners will provide accurate information about their operations, labour, health and safety and environmental practices, without distortion or concealment of facts, either at AEI request or on their own initiative.

Partners are requested to inform AEI immediately of any events that could result in reputational risk or other negative impact on AEI.

Validity and Amendments. By entering into contractual relations with AEI, the Partner undertakes to comply with this PCOC. AEI shall not reimburse the Partner for any costs incurred by the Partner in connection with the implementation of the requirements of the PCOC.

AEI reserves the right to update, change or modify the requirements of the PCOC and this shall not be deemed to be grounds for termination of the business relationship with AEI. Partners must familiarize themselves with the changes made and act accordingly. AEI may inform Partners separately, electronically, of major changes to the PCOC. The latest version of the PCOC is available on the Internet at www.lordslb.lt/AEI_green_bonds/.

*Approved by Board Decision of UAB "Lords LB Asset Management"
No. 2023 06 05 - 01 / VS, dated 5 June, 2023*

*Manager of the Investment Company
Grėtė Bukauskaitė*
