PORT OF
KLAIPĖDA

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Sustainability Report

Reporting year 2025

Joint Stock Company Klaipėda State Seaport Authority

List of abbreviations

Term or abbreviation	Explanation
ARC	Audit and Risk Committee
CSRD	Corporate Sustainability Reporting Directive
CapEx	Capital expenditure, investments
CO_2	Carbon dioxide / carbon footprint
EFRAG	European Financial Reporting Advisory Group
ES	European Union
ESRS	European Sustainability Reporting Standards
KIPIS	Cargo and Goods Information System
Port of Klaipėda	Joint Stock Company Klaipėda State Seaport Authority and companies operating in the port area
LR	Republic of Lithuania
mEur	millions of euros
SMEs	Small and Medium Enterprises
OpEx	Operational expenditure, general expenses
OPS	Onshore power supply
EIA	Environmental Impact Assessment
PERS	Port environmental review system
KPI	Key performance indicators
Ro-ro ship	A vessel designed to carry wheeled or roll-on/roll-off cargo
Ro-pax ship	A vessel designed to carry passengers and cargo
GHG	Greenhouse gases
Port Authority	Joint Stock Company Klaipėda State Seaport Authority
GCC	Public Enterprise Governance Coordination Center

Contents

General information **6**
Basis of preparation 8
Business model and value chain 10
Management structure 13
Sustainability Management 14
Integration of sustainability into the reward system 17
Sustainability reporting risk management 17
Stakeholders 18
Significance assessment process 25
Sustainability strategy 29

Environmental information **31**
Climate change: Climate change mitigation and energy 32
Pollution 49
Biodiversity and ecosystems 56
Resource use and circular economy 59
Disclosure of information according to the EU Taxonomy Regulation 61

Social information **70**
Own workforce: working conditions 71
Affected communities: friendly relations with the local community 85

Governance information **90**
Business conduct 91
Diversion and sabotage 98
Cybersecurity 99
Quality of port infrastructure and sustainable port infrastructure development 100

Annexes **103**
Annex 1. List of Disclosure Requirements in accordance with ETAS 104
Annex 2. EU Taxonomy KPI Tables (2025) 108
Annex 3. Independent Limited Assurance Report 112

Awards and Recognition in 2025

In 2025, the Klaipėda State Seaport Authority received significant external recognition in the areas of environmental protection, innovation, and responsible business. Six awards from five different organizations confirm that the Port Authority's strategic sustainability commitments are translating into tangible results.

The Sustainability Reporting Leader recognition awarded by the Governance Coordination Center (GCC) confirms that the Port Authority has successfully met the requirements of the ESRS standards. However, the Port Authority does not limit itself to the title received – the recognition has encouraged us to raise the bar further: to disclose information more comprehensively, to compare and analyze it, and to prepare consistently for future mandatory accountability requirements. The public procurement leader award granted by the Ministry of Environment reflects the Port Authority's commitment to green procurement – the purchases for hydrogen production and onshore power supply (OPS) infrastructure projects were recognized as the most innovative and complex in the country in 2025.

6
Awards 2025

5
Organizations

3
Sustainability areas

OMC
Most responsible company
Main award for the most responsible companies in Klaipėda

SOCIAL RESPONSIBILITY

LVK
Honorary badge
Leadership in creating a modern, sustainable, and strategically developed Port of Klaipėda

BUSINESS LEADERSHIP

MINISTRY OF FINANCE
European Sails
Main award for investments and innovations (project "Enduruns")

INNOVATIONS

GCC
Leader in sustainability reporting
Recognition for sustainability accountability according to ESRS requirements

SUSTAINABILITY

LKP
Lithuanian product of the year gold medal
Radar control system tower in Smiltynė

INFRASTRUCTURE

MINISTRY OF ENVIRONMENT
Leader in public procurement
Procurement for hydrogen production and onshore power supply projects

GREEN PROCUREMEN

General information

Basis of preparation	8
Business model and value chain	10
Management structure	13
Sustainability Management	14
Integration of sustainability into the reward system	17
Sustainability reporting risk management	17
Stakeholders	18
Significance assessment process	25
Sustainability strategy	29

Introduction by the Director General

Just a few years ago, sustainability was often perceived as an innovation or a sign of modernity. Today, it is no longer a fashionable trend – it relates to responsibility and is an integral part of operations. The Port of Klaipėda, which five years ago set green direction and social responsibility priorities, has viewed sustainability from the very beginning not as a short-term initiative. It is a consistent direction that has become an integral part of our strategy.

We are committed not only to assessing and monitoring the port's environmental impact but also to setting higher goals for ourselves each year – reducing emissions, investing in green energy, and becoming an example of advanced, environmentally friendly operations in the community of seaports.

Looking back at 2025, we can state that the set goals are turning into tangible results. Over the past year, we have achieved a significant reduction in greenhouse gas (GHG) emissions in our operations. This means that we have reduced GHG emissions in our operations by 69 tons, which is equivalent to the annual emissions of approximately 35 cars.

However, we do not stop there. We are approaching the start of green hydrogen production. The installation of onshore power supply equipment at terminals will reduce air pollution and noise, while the company's fleet, which will soon be updated, will operate with a waste collection vessel powered by green hydrogen and hybrid pilot boats. These are not just technological solutions – they clearly indicate our direction towards a smaller environmental impact.

Operating in the city and being an integral part of its economic and social ecosystem, we understand that port development must proceed harmoniously, responsibly, and be based on dialogue with communities. We actively contribute to city infrastructure projects, events, and other initiatives aimed at residents. The approved company support procedure allows us to further strengthen partnerships with communities closest to the port.

We also pay great attention to our employees – we consistently strive to create an open, trust-based work environment and culture where learning, leadership, and creativity become part of daily work. A survey of employee satisfaction and engagement showed that overall satisfaction with the organization reaches 92 percent, surpassing both the Lithuanian and global company averages.

The path we have chosen is responsibility, progress, and long-term value. Only by acting responsibly today can we ensure that the Port of Klaipėda remains modern, competitive, and value-creating in the future.

Algis Latakas

Director General of the
Klaipėda State Seaport Authority

Disclosure Requirements List

ETAS 2	General Disclosures	Pages
BP–1	General basis for preparation of Sustainability Report	8
GOV–1	The role of governance and supervisory bodies	13
GOV–2	Information provided to the company's governance and supervisory bodies and sustainability issues addressed by them	14
GOV–3	Integration of sustainability-related performance in incentive schemes	17
GOV–4	Statement on due diligence	16
GOV–5	Risk management and internal controls over sustainability reporting	17
SBM–1	Strategy, business model and value chain	9
SBM–2	Interests and views of stakeholders	18
SBM–3	Material impacts, risks and opportunities and their interaction with strategy and business model	26
IRO–1	Description of the process to identify and assess material impacts, risks and opportunities	20
IRO–2	Disclosure requirements in ESRS covered by the undertaking's Sustainability Report	25

Basis of preparation

ESRS 2 BP-1

The Sustainability Report of the Joint Stock Company Klaipėda State Seaport Authority (hereinafter – Port Authority) has been prepared in accordance with the European Sustainability Reporting Standards (ESRS) established by Commission Delegated Regulation (EU) 2023/2772, and the Corporate Sustainability Reporting Directive (CSRD, Directive (EU) 2022/2464 of the European Parliament and of the Council).

The provisions of Directive (EU) 2022/2464 were transposed into national law by the legal acts of the Republic of Lithuania that came into effect on July 1, 2024, including:

- Amendments to the Law on the Accounting of Companies and Groups of Companies of the Republic of Lithuania (amendment adopted on June 25, 2024; consolidated version effective as of July 1, 2025), establishing requirements for the preparation, content, and publication of sustainability reports;
- The Law on the Audit of Financial Statements and Other Assurance Services of the Republic of Lithuania, which regulates the requirements for the independent assurance of sustainability reports.

The Sustainability Report has been prepared in accordance with the provisions of the aforementioned legal acts, ensuring the consistency, comparability, and compliance of reporting with the sustainability reporting regulations of the European Union and the Republic of Lithuania.

The purpose of the report is to provide relevant, consistent, and comparable information about the actual and potential impacts, risks, and opportunities of the Klaipėda State Seaport Authority's activities in the environmental, social, and governance areas for the reporting year 2025, considering the nature of the activities, the value chain, and applicable national requirements.

Directive (EU) 2025/794 of the European Parliament and of the Council, adopted on April 14, 2025, also known as the Omnibus Directive or the "Stop the Clock" initiative, has significantly changed sustainability reporting in the European Union. For state-owned enterprises, such as the Port Authority, the CSRD requirements remain advisory in nature, as they do not meet the applicable criteria based on the number of employees and turnover. Despite the fact that there is no obligation for the company to provide a sustainability report according to the requirements of the CSRD, the Port Authority voluntarily continues the preparations that began in 2024.

In pursuit of long-term value creation, the Port Authority chooses to act proactively, guided by best practices, integrating ESRS principles into operational planning and risk management, and following OECD recommendations. The report covers the activities of the Port Authority during the year 2025, including relevant parts of the higher and lower value chains related to the activities of the Port of Klaipėda.

The content of this Sustainability Report corresponds to and complements the annual management report of the Joint Stock Company Klaipėda State Seaport Authority for the year 2025.

Distribution of revenues by significant ESRS sectors (SBM-1)

The 2024 Sustainability Report stated that information on the distribution of revenues by significant ESRS sectors (2 ESRS SBM-1, Article 40(b)) and the list of additional significant ESRS sectors (Article 40(c)) will be provided in accordance with the effective date set out in the Commission delegated act. The Port Authority decided to disclose this information voluntarily in the 2025 Sustainability Report, aiming for greater transparency, better understanding of the organization's operations and impacts, and consistent preparation for future mandatory ESRS requirements.

Methodology for assigning revenues to ESRS sectors

Revenue was classified based on the European Classification of Economic Activities (NACE Rev. 2) , identifying the sectors to which the Port Authority's activities belong. The Port Authority operates under the "Landlord" management model, i.e., it does not engage in the direct transport of cargo or passengers, but rather provides port infrastructure management, navigation, and vessel servicing, and leases port land and infrastructure to companies and organizations operating within the port area. For this reason, Group 50 of Section H (Water Transport) does not apply to the Port Authority as a source of revenue - it covers activities carried out by shipping companies, not by the port administration.

It has been determined that in 2025, the Port Authority's main sources of revenue comes from two key ESRS sectors: Section H, Group 52.22 (Service activities incidental to water transportation) and Section L, Group 68.20 (Rental and operating of own or leased real estate). The breakdown of revenue by sector is presented in the table below.

NACE code	Sector name	Revenue composition	Revenue, thousand EUR	Share, %
H52.22	**Service activities incidental to water transportation**		**51 683,5**	**81,6**
		Tolls from port dues	50 990,7	
		Navigation, vessel maintenance, and other services*	692,8	
L 68.20	**Rental and operating of own or leased real estate**		**11 626,7**	**18,4**
		Land rental (no infrastructure)	4 876,5	
		Land rental for infrastructure (quays)	49,9	
		Other rentals (premises, structures)		
Total:			**63 310,3**	**100,0**

Includes: pilot and vessel handling services, vessel mooring services, buoy maintenance services, pollution cleanup operations (collection of waste from vessels), revenue from small vessel berths, and services related to the use of the KIPIS information system.

Notes on classification

Land lease revenue is divided into two separate components, each reflecting a different economic nature: net land lease (excluding infrastructure) covers revenue received from the lease of the port land plot, while the portion of land lease for infrastructure covers the portion of revenue directly related to the use of the port's quays and other hydraulic infrastructure. This division is also important in the context of the EU Taxonomy Regulation (Regulation (EU) 2020/852), under which activities related to the operation of water transport infrastructure are treated separately from the leasing of net assets.

Financial operating income (interest, late fees, currency exchange effects) and atypical operating income (gains from asset disposals, penalties, insurance payouts) are not attributed to any ESRS sector, as they are not related to the core activities of the Port Authority and are not included in the income distribution disclosure according to ESRS SBM-1 requirements.

List of additional significant ESRS sectors

In accordance with Clause c of Article 40 of 2 ESRS SBM-1, the Port Authority conducted an assessment to determine whether its activities encompass additional significant ESRS sectors that are not included in the standard disclosure lists. The assessment found that the activities of the Port Authority are limited to the two sectors mentioned above (H 52.22 and L 68.20) and there are no additional significant ESRS sectors.

Governance model

The Port of Klaipėda operates under a "Landlord" governance model, under which the public sector manages the port's land, develops infrastructure, performs regulatory functions, and leases land to private businesses, while the private sector carries out commercial activities. The land and water area of the Port of Klaipėda is the exclusive property of the Republic of Lithuania. The Port Authority manages, uses, and disposes of the port land and the port's water area in trust, takes care of the operation and development of the port's infrastructure, ensures the safety of the Port of Klaipėda and the safety of shipping, and provides vessel management services. In order to properly perform its assigned functions, the Port Authority oversees the development and operation of the Port of Klaipėda's infrastructure, ensures port and maritime safety, manages logistics flows, and provides services to vessels. The company also ensures and implements a sustainability strategy, aiming for the Port of Klaipėda to become sustainable and for its activities to comply with legal and environmental standards.

Value chain

The proper functioning of the operational chains is essential for the successful operation of the Port of Klaipėda. The value chain encompasses all activities of the Port Authority, resources, and relationships with stakeholders, based on which the Port Authority provides services. This chain is divided into three main parts:

1. The initial part of the value chain includes all activities, resources, and services that enable the operations of the Port Authority, including suppliers, infrastructure builders, and regulatory elements of the legal environment.
2. The direct part of the value chain consists of the core activities of the Port Authority that create value.
3. The final part of the value chain involves activities where value is transferred to clients, partners, and society.

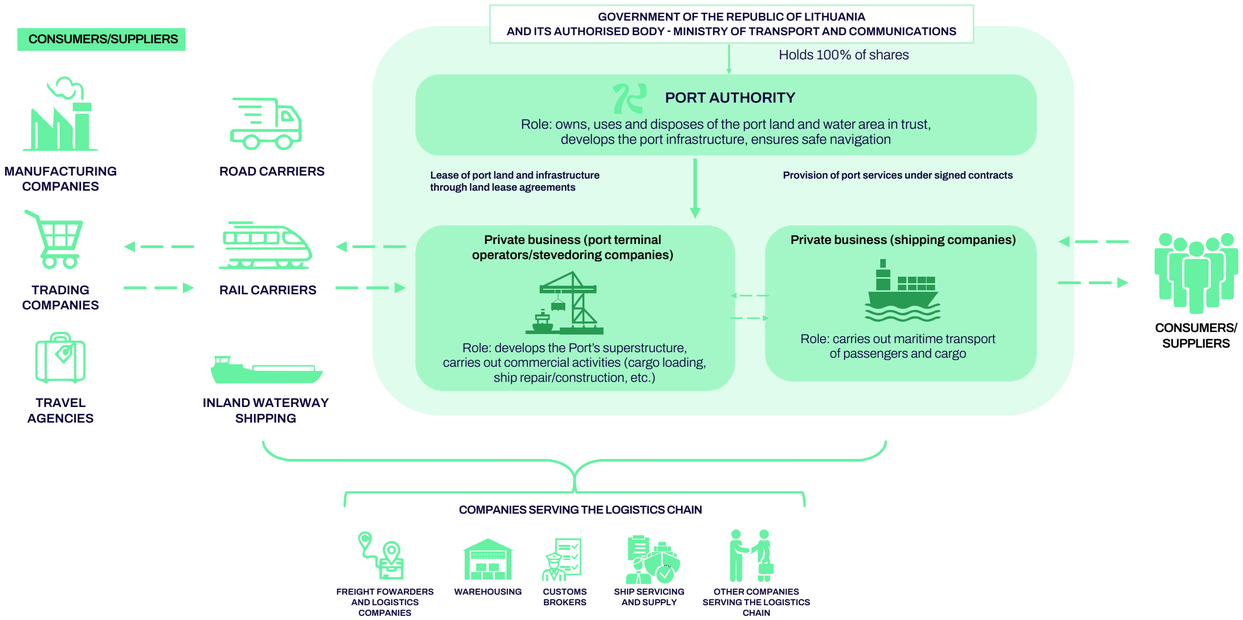
Initial part of the value chain

1. The execution of activities at the Port of Klaipėda involves the resources necessary for port operations:
   - **suppliers of materials and services:**
     - infrastructure contractors carrying out the reconstruction of breakwaters (jetties), dredging of the shipping channel, modernization of quays, construction of other structures, construction of water supply, domestic wastewater and surface runoff water (rainwater) networks, and reconstruction of roads and railways;
     - suppliers of materials for port maintenance and development, suppliers of goods for vessel repairs, suppliers of navigation and radar equipment;
     - suppliers of equipment for port operations and infrastructure maintenance;
     - suppliers of energy, heat, and water that provide the port with electricity, heat, and water;
     - suppliers of wastewater collection and treatment;
   - **providers of professional services:**
     - suppliers of architectural and engineering services, experts carrying examinations, and providers of geological and archaeological services;
     - lawyers who advise on contract drafting, regulatory issues, and compliance with laws;
     - IT and cybersecurity service providers that ensure system security against cyber threats, conduct security audits, and support port management systems.
2. Funding and investments:
   - **The Port Authority effectively utilizes the funding opportunities provided by European Union and national public funds for modernizing port infrastructure and financing projects.**
   - **Private sectors and port terminal operators independently invest in infrastructure (handling equipment, warehouses, vessel servicing infrastructure).**
   - **If there is a need and opportunity, loan agreements are made.**
   - **The remaining part is financed by the Port Authority's funds.**
3. Regulation and geopolitical environment:
   - **The activities of the Port Authority are governed by the laws of the Republic of Lithuania and other legal acts of the Republic of Lithuania and the EU.**
4. The Klaipėda State Seaport is an important object for ensuring national security; therefore, to ensure an appropriate level of security, the following are utilized:
   - **Lithuanian Armed Forces;**
   - **The State Border Guard Service under the Ministry of the Interior of the Republic of Lithuania;**
   - **The Customs Department under the Ministry of Finance of the Republic of Lithuania.**
5. Other institutions controlling the activities of the Port of Klaipėda:
   - **The Environmental Protection Department under the Ministry of Environment;**
   - **The Klaipėda branch of the National Public Health Centre under the Ministry of Health;**
   - **The State Plant Service under the Ministry of Agriculture;**
   - **The State Food and Veterinary Service.**

Business model and value chain

SBM–1

Figure 1.
The operational model of the Port Authority



Components of the Direct Value Chain

1. In the port area (managed and utilized of by the Port Authority under trust), the Port Authority performs the following functions based on legal acts:

- **Develops port infrastructure:**
  - maintains the water area and quays of the Port of Klaipėda (including maintaining depths in the water area, at quays and piers), develops territories and utilizes them;
  - ensures the condition and development of navigational infrastructure;
  - prepares reserve areas of the port for future development;
  - prepares drafts of the port strategy, detailed plans for the port and reserve areas, and organizes their implementation;
  - examines the reconstruction of buildings in the port, construction projects of new facilities, carries out repairs as needed, establishes and approves mandatory technical conditions.
- **Ensures safe shipping and activities in the port area:**
  - provides navigation services – vessel piloting, organization of pilot services, supervision of safe shipping rules, repair and maintenance of navigational equipment;
  - ensures the activities of the harbour master and the safety of shipping;
  - organizes rescue operations for vessels and people in the water area;
  - coordinates the protection of the port area carried out by port land users.
- **Provides opportunities for commercial activities:**
  - vessel servicing services, including waste collection, cargo and logistics optimization;
  - transportation of cargo and passengers – optimizing flows through the Port of Klaipėda, ensuring efficient transit of containers, fertilizers, grains, oil products, and other cargo by water and road transport, including by rail;
  - leases port land, as well as temporarily transfers it for use free of charge in accordance with the procedure established by the Government of the Republic of Lithuania.
- **Performs environmental protection functions:**
  - organizes and eliminates pollution that has occurred in the water area;
  - organizes and implements port environmental protection to reduce negative impacts on ecosystems;
  - coordinates environmental issues with local communities, the public, institutions, and other stakeholders, especially when planning new infrastructure projects;
  - executes sustainability and environmental initiatives to achieve long-term impact reduction and sustainable port development;
  - supervises and manages port reserve areas in accordance with the procedures established by the Government of the Republic of Lithuania.

2. Human resources are one of the most important factors directly contributing to the creation of company value. Employee qualifications, including unique skills related to port operations and specifics, along with acquired long-term experience, determine the quality of services provided by the port, contribute to ensuring port security, and create greater value for clients and the national economy.

3. Implementation of sustainability strategy:

   - **Development of green energy production infrastructure – installation of equipment for the production of green fuel (hydrogen) and public hydrogen refueling stations.**

   - **Reduction of GHG emissions:**

     — electrification of quays;

     — integration of electric and hydrogen-powered vehicles within the port area;

     — acquisition of hybrid pilot boats;

     — acquisition of a hydrogen-powered waste handling vessel;

     — purchase of green energy and installation of a solar power plant on the roof of the new fleet base;

     — more detailed calculation of GHG emissions.

   - **Port environmental management:**

     — to maintain the PERS certificate, management documents are updated every two years, an environmental performance report is prepared, and an external audit is conducted;

     — to maintain the ISO 14001:2015 certificate, annual audits are conducted;

     — monitoring of the environment, condition of the shores, and biodiversity;

     — programmes for reducing air, water, noise, and soil pollution.

   - **Employee qualification enhancement and involvement in the company's activities to ensure employee engagement.**

   - **Encouraging the involvement of local communities by organizing joint meetings, presenting current and future projects, organizing events, and providing support for community initiatives.**

   - **Ensuring transparent and ethical operation:**

     — prevention of corruption-related incidents;

     — annual audits are conducted to maintain ISO 37001:2016 certification;

     — preventive actions are taken to prevent diversions and acts of sabotage.

   - **Implementation of sustainable infrastructure projects:**

     — ensuring that implemented infrastructure projects meet EU taxonomy criteria and contribute to climate change mitigation;

     — new public spaces, recreational areas, and marinas are planned to be created, taking into account community needs and the impact of development on the environment.

4. Application of marketing principles and innovations to ensure the attraction of new clients, the development of partnerships with other European ports, and the increase of port competitiveness.

5. Implementation of digital solutions – modernization and digitization of port management systems, data analytics, and the implementation of artificial intelligence solutions in logistics management.

Final part of the value chain

1. Commercial operators of the Port of Klaipėda, participating in the company's value chain model, contributing to the port's operational results through their activities:

   - **land tenants utilizing the land of the Port of Klaipėda for cargo turnover, storage, passenger service, shipbuilding and repair, etc.;**

   - **vessel owners and agents – shipping companies using port services, cruise lines utilizing the Port Authority's ship terminals;**

   - **small boat owners using boats for recreational shipping and passenger service.**

2. Local communities living in areas close to the port are considered an important stakeholder, whose needs the Port Authority takes into account by ensuring necessary infrastructure, such as pedestrian paths, recreational areas, and city roads through which cargo enters the port, to reduce the impact of cargo movement on city residents, and directly involves them in discussions of existing and future projects at the Port of Klaipėda.

3. Companies complementing the logistics chain engaged in the transportation of goods and service provision, such as road, rail, and inland water transport:

   - **freight forwarders and logistics companies;**

   - **warehouse workers;**

   - **customs intermediaries.**

4. End users and suppliers – recipients of goods and services who import and export cargo through the Port of Klaipėda, travel agencies, and maritime passengers.

Management structure

GOV–1

The management of the Klaipėda State Seaport Authority is based on the highest standards of transparency, accountability, and professionalism. The company's governance bodies, the Board and the Supervisory Board, ensure the implementation of strategic goals, continuity of operations, and the integration of sustainability principles into daily activities.

The Board is a collegial governance body. In January 2025, it consisted of 5 members, including the Director General, who also served as the Chairman of the Board, while at the end of the reporting period, the number of board members was 4. Board members are appointed for a four-year term by the Supervisory Board, in accordance with the requirements of the Law on Companies of the Republic of Lithuania and other legal acts. The selection of Board members is based on professional experience and competencies. The Board is accountable to the Supervisory Board and the general meeting of shareholders. The Board makes decisions necessary for the implementation of the company's strategy according to the competencies specified in the Articles of Association, participates in financial management and performance monitoring, and in processes ensuring long-term sustainability.

The Supervisory Board makes decisions regarding the formation of committees. Committees provide their conclusions, opinions, and proposals to the Supervisory Board based on their competencies. A committee is formed, and its members are appointed for no longer than the term of the Supervisory Board. At the beginning of the reporting period, the Supervisory Board consisted of 5 members, and by the end of the period, it had four members, after Eligijus Kajieta resigned on March 31, 2025. Currently, two committees have been formed in the Port Authority. On January 20, 2023, it was decided at the Supervisory Board meeting to establish a Remuneration and Nomination Committee; the committee consists of three members of the Supervisory Board, but since March 31, 2025, after Eligijus Kajieta's resignation, the committee has not been operational as it no longer meets the minimum requirement of three members specified in the Articles of Association. On February 8, 2003, it was decided to establish the Audit and Risk Committee of the Port Authority's Supervisory Board. The Audit and Risk Committee is composed of three members: two members of the Supervisory Board and one committee member.

The members of the Supervisory Board and the Board have many years of experience in the seaport and logistics sectors; their areas of expertise include strategic and organizational management, infrastructure development, risk and crisis management, and the implementation of sustainability policies. In the area of sustainability, several members of the Supervisory Board have gained practical experience in implementing environmental solutions in both private and public sector organizations, participating in the processes of setting sustainability goals and preparing reports, as well as completing an international sustainability leadership programme at the Saïd Business School of the University of Oxford. Among them are members whose activities include the comprehensive implementation of the decarbonization of transport operations by 2030, the assessment of the links between sustainability and financial reporting, and the review of double materiality analysis. These competencies ensure that the governing and supervisory bodies have or can draw on the necessary skills to properly oversee sustainability issues that address the material impacts, risks, and opportunities identified by the company.

In 2025, members of the Board, the Audit and Risk Committee, the Supervisory Board, leaders, and other interested employees participated in specialized sustainability training aimed at strengthening skills related to sustainability principles, regulatory requirements, and double materiality analysis. Topics:

- "Presentation of double materiality assessment according to ESRS requirements" – the methodological framework of ESRS, the principles of double materiality assessment (impact and financial), the process and results of the stakeholder survey were introduced, and practical issues were discussed, with answers provided to participants' questions.

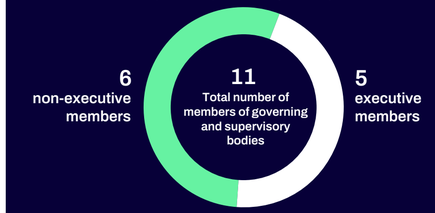
The Port Authority plans to provide ongoing professional development for its executives and Board members, ensuring that the governing bodies are able to effectively implement strategic goals related to sustainability. Sustainability issues are also periodically discussed at Board meetings and in the Supervisory Board's Audit and Risk Committee, where ongoing monitoring and evaluation take place to ensure the long-term implementation of the sustainability strategy. The Port Authority, aiming to expand sustainability knowledge and its practical implementation, plans to engage external sustainability experts and consultants in the future.

Further information regarding the responsibilities of the members of the Supervisory Board and the Board is available on the Port Authority's official website, "portofklaipeda.lt", and in the 2025 management report.

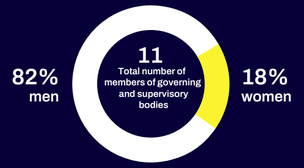
Composition of governing bodies and gender balance

2025*

27 % independent members (out of 11, 3 are independent)



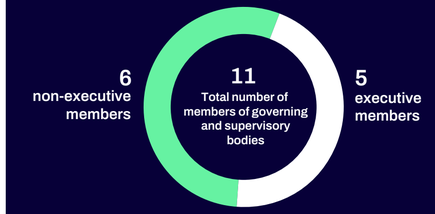
20% gender balance in the Board



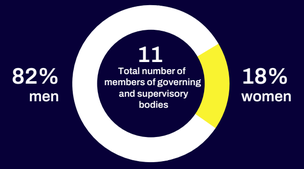
*2025 data is provided based on the information of the reporting period

2024

27 % independent members (out of 11, 3 are independent)



22% gender balance in the Board



The Supervisory Board includes two committees:

Remuneration and Nomination committee

Committee members:
Kristina Petraitienė,
Gytis Mažeika,
Eligijus Kajieta

Audit and Risk Committee

Committee Chairman:
Dr. Aurimas Vilkelis

Committee members:
Nemunas Biknius,
Laura Garbenčiūtė-Bakienė,
dr. Aurimas Vilkelis

Chairman of the Board:
Algis Latakas, Director General

Members:
Vidmantas Paukštė, Infrastructure Department Director of the Company
Martynas Armonaitis, Director of the Financial Department
Džiugas Šaulys, Commercial Department Director of the Company
Head of Organizational Development Ela Žemaitienė (until January 2025)

Supervisory Board (SB)
This is a collegial body responsible for overseeing the company's operations, consisting of five members. As of the end of 2025, there were four members, two of whom were independent (the third member, Eligijus Kajieta, served until March 2025).

The Supervisory Board is elected for 4 years, with the term starting from the date of appointment and ending 4 years after the appointment date.

In 2022, through an open selection process, the Ministry of Transport and Communications of the Republic of Lithuania selected the KSSA Supervisory Board, which began its work on January 2, 2023.

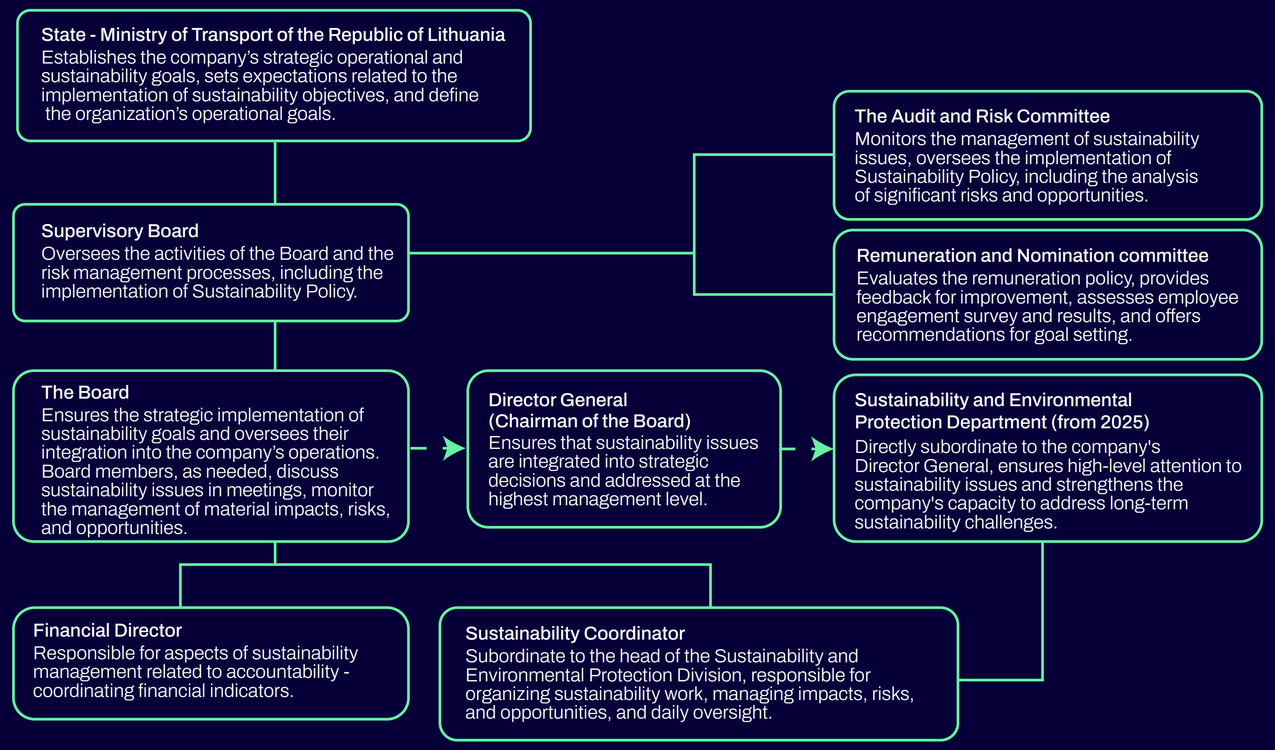
Elected independent members:
Nemunas Biknius (Chairman of the KSSA Supervisory Board);
Dr. Aurimas Vilkelis;
Eligijus Kajieta (until March 31, 2025)

Other members of the Supervisory Board:
Gytis Mažeika.
Kristina Petraitienė.

Sustainability Management

GOV–2

Figure 2. Port Authority's sustainability management scheme



Sustainability aspects are integrated into the company's management structure and closely related to the expectations set by the state as the sole shareholder. The Ministry of Transport of the Republic of Lithuania is responsible for the exercise of shareholder rights and obligations, setting the strategic operational and sustainability goals of the Company and establishing expectations for their implementation. These expectations are publicly established by Order No. 3-7 of the Minister of Transport and Communications of the Republic of Lithuania dated January 14, 2026, "On Approval of the Letter Regarding the State's Objectives and Expectations for the State Enterprise Klaipėda State Seaport Authority".

Governance and supervisory bodies – Supervisory Board, Board, and the company's Director General – participate in addressing sustainability issues according to their assigned competencies. The Supervisory Board conducts overall oversight of activities and risk management, including the implementation of sustainability policies, and its established Audit and Risk Committee (hereinafter – ARC), composed of independent members, oversees and monitors sustainability issues. The ARC regularly (at least once a month during meetings) discusses sustainability-related issues, including the analysis of material impacts, risks, and opportunities, the progress of sustainability goal implementation, changes in European Union legislation (EU, EP, EC) in the area of sustainability, as well as work plans and their implementation progress.

The Board ensures the integration of strategic sustainability goals into the company's operations and regularly reviews sustainability issues in meetings, by monitoring the management of material impacts, risks, and opportunities. The company's Director General, who also serves as the Chairman of the Board, ensures that sustainability issues are addressed at the highest organizational level and integrated into strategic decision-making. Since 2025, the company has had a Sustainability and Environmental Protection Division, which reports directly to the company's Director. This structural change has strengthened sustainability management within the company and ensured that sustainability issues are addressed at the highest organizational level. Responsibility for the implementation of Sustainability Policy, management of impacts, risks, and opportunities, and coordination is concentrated in this division.

The day-to-day organization of sustainability activities, data collection, the assessment of impacts, risks, and opportunities, and the preparation of the Sustainability Report are carried out by the sustainability coordinator, who reports directly to the head of the Sustainability and Environmental Protection Division. Strategic sustainability issues and decisions, when necessary, are presented through the head of the Sustainability and Environmental Protection Division and discussed together with the company's Director.

Environmental (E), social (S), and governance (G) aspects are managed in accordance with the principle of functional responsibility:

- **E (environment)** – The Sustainability and Environmental Protection Division together with the Harbour Master Office;
- **S (social issues)** – The Organizational Development Department;
- **G (governance)** – The Department of Operational Resilience, ensuring cross-functional collaboration and coordination through the sustainability coordinator.

In 2025, the Supervisory Board approved the policy on the reporting process of the Joint Stock Company Klaipėda State Seaport Authority (Resolution of October 31, 2025, approved on November 24, 2025 by Minutes No. STP-16 of the Supervisory Board meeting). This policy establishes the deadlines for preparing the Sustainability Report, responsibilities, data submission procedures, and other reporting-related commitments, thereby enhancing the transparency and consistency of sustainability management processes.

In 2025, the results of the double materiality assessment were compared with the 2024 assessment, which was conducted through expert evaluation. The comparative analysis allowed for the assessment of the continuity of material topics, changes in their prioritization, and refinement of the assessment results, considering broader stakeholder engagement. The nature of the organization's operations and the composition of its workforce remained stable during the period under review and did not have a material impact on the assessment results.

The Strategic Action Plan is prepared for a four-year period and updated annually, ensuring its alignment with the results of the double materiality assessment. The Port Authority follows the approved strategy of the Port of Klaipėda with a Strategic Action Plan through 2035, which outlines long-term sustainable development goals and directions. The document is updated annually.

The assessment involved KSSA leaders and specialists responsible for relevant environmental, social, and governance areas. During the process, collaboration took place with internal and external experts. During the evaluation, all topics presented under ESRS were analyzed to identify material topics by evaluating the entire value chain and to reveal them, as well as to establish links between the company's operations and the initial and final stages of the value chain. ARC members were informed about the results of the double materiality assessment and had the opportunity to provide comments and suggestions.

The following material ESRS topics were identified, which directly correspond to the Port Authority's areas of activity, impact, and responsibility:

ESRS E1 Climate change:
- Climate change mitigation and Energy.

ESRS E2 Pollution:
- Air, water, soil, and pollution.

ESRS E4 Biodiversity and ecosystems:
- Land use changes
- Invasive alien species, pollution, others.

ESRS E5 Circular economy:
- Resource inflows, including resource usage.

ESRS S1 Own workforce:
- Social dialogue, existence of labor councils, employee information, consultation rights, and participation rights.

ESRS S1 Own workforce:
- Work-life balance.

ESRS S1 Own workforce:
- Health and safety.

ESRS S1 Own workforce:
- Gender equality and equal pay for work of equal value.

ESRS S1 Own workforce:
- Training and skills development.

ESRS S1 Own workforce:
- Diversity.

ESRS S1 Own workforce:
- Employer reputation.

ESRS S1 Own workforce:
- Labor force shortage.

ESRS S3 Affected communities:
- Economic, social, and cultural rights of communities (water and sanitation, land and/or security-related impacts).

ESRS G1 Business conduct:
- Corruption and bribery (prevention and detection, including training; incidents).

ESRS G1 Business conduct:
- Corporate culture.

ESRS G1 Business conduct:
- Management of relationships with suppliers, including payment practices.

Additional topics:
- Diversion and sabotage.
- Cybersecurity.
- Port infrastructure quality and sustainable development.

When developing topics, material impacts, risks, and opportunities are also examined, and a final list of material topics is provided. Information on material impacts, risks, and opportunities is presented in separate sections for each ESRS topic.

Key elements of the comprehensive review

GOV–4

Elements	Parts of the Sustainability Report	Is the disclosed information related to people and (or) the environment?
Embedding comprehensive review into governance, strategy and business model	1. Sustainability management (GOV-2) 2. Double materiality assessment (IRO-1) 3. Decision-making process and related internal control procedures (IRO-1)	It is related to both people (employee rights, community impact, shareholder expectations) and the environment (pollution reduction measures, climate impact)
Involvement of affected stakeholders in all key stages of the comprehensive review	1. Stakeholders (SBM-2) 2. Significant inclusion processes (S1) 3. Methods and stages of involving affected communities (S3)	It is related to people
Identifying and assessing adverse impacts	1. Double materiality assessment (IRO-1) 2. Material impacts, risks, and opportunities related to climate change (IRO-1) 3. Material impacts, risks, and opportunities related to air pollution (IRO-1) 4. Company operations and their impact, risks, and opportunities on working conditions (IRO-1) 5. Material impact, risks, and opportunities related to affected communities (IRO-1) 6. Material impact, risks, and opportunities in business ethics (IRO-1) 7. Material impact, risks, and opportunities related to diversion and sabotage (IRO-1) 8. Impacts, risks, and opportunities arising from cybersecurity (IRO-1) 9. Material impact, risks, and opportunities due to port infrastructure (IRO-1)	It is related to the environment (pollution, emission reduction, energy projects) and people (employee safety, working conditions, community well-being)
Implementation of actions to address these negative impact issues	1. Actions and resources related to climate change mitigation and adaptation (E1-3) 2. Tasks, actions, and resources related to air pollution (E2-2) 3. Sustainability strategy, goals, actions, and tasks related to own workforce (S1-4) 4. Sustainability strategy, goals, tasks, and measures related to affected communities (S3-4) 5. Zero tolerance for corruption and bribery 6. Employee training and education 7. Management of diversion and sabotage risks 8. Cybersecurity risk management measures 9. Management measures for sustainable infrastructure	It is related to the environment (pollution reduction measures, energy projects) and people (safety, social responsibility)
Monitoring and communicating the effectiveness of these efforts	1. Management of sustainability reporting risks (GOV-5) 2. Sustainability strategy (SBM-1)	It is related to the environment (monitoring programme, GHG reduction targets) and people (social indicators, ethical standards)

Integration of sustainability into the reward system

GOV–3

In the Port Authority, sustainability aspects are gradually being incorporated into the executive reward system to support the achievement of strategic objectives and strengthen management accountability for the company's long-term value creation. The reward policy is based on a combination of fixed and variable pay, with the variable part linked to pre-established performance results, including aspects related to sustainability management.

In 2025, sustainability goals were linked to the variable part of remuneration of the company's Director General. In the Director General' reward structure, the variable part accounts for up to 10% of the annual salary, and its evaluation includes not only financial and operational indicators but also aspects related to sustainability management that reflect the company's strategic priorities, including infrastructure development, mobility solutions, and investment planning.

In addition to the Director General, in 2025, certain sustainability aspects were also linked to the variable part of remuneration of other department heads. Considering their areas of responsibility, the performance evaluation of department directors applies sustainability-related criteria that include planning and implementation of infrastructure projects, energy efficiency, investment compatibility with sustainability priorities, and the implementation of strategic initiatives related to the long-term development of the port. Specific indicator values and target values are not disclosed in the Sustainability Report.

It should be noted that, at the time of preparation of this Sustainability Report, climate change-related indicators, including greenhouse gas (GHG) reduction targets, are not directly incorporated into the reward system. These aspects are not integrated into the reward calculation mechanism at this stage.

The sustainability incentive policy is periodically reviewed and updated, taking into account the company's sustainability maturity, operational priorities, and the requirements of European Union legislation. It is anticipated that starting from 2026, the scope of integrating sustainability indicators into the reward system may be reviewed and, if necessary, expanded. Starting in 2026, the climate change mitigation target of reducing GHG emissions to 500 tons per year will be integrated into the company's annual goals system. Achieving this indicator will be included in the calculation of the variable compensation for executives and the evaluation of all employees' incentives for achieving goals. The weight of the indicator will constitute 5% of the organization's goals portion (out of 20% allocated for annual company goals).

Integration of sustainability goals into executive compensation in 2025

Goals group (sustainability goals)	Weight, (%)	Implementation date
Director General	10 %	31/12/2025
Infrastructure Director	20 %	31/12/2025
Director of the Commercial Department	10 %	31/12/2025

Sustainability reporting risk management

GOV–5

The company's sustainability reporting process is integrated into the overall risk management system to ensure the reliability, transparency, and compliance of information with ESRS requirements. Key risk management and internal control measures:

- **Operational Risk Register**
  Risks related to sustainability reporting are identified and recorded in the company's Operational Risk Management Register, which allows for monitoring the status of risks and planning their mitigation actions.
- **Discussions in the Audit and Risk Committee**
  Sustainability topics and associated risks are regularly discussed at ARC meetings.
- **Regular Reports**
  Starting from 2024, it has been decided to regularly inform ARC about the status of sustainability activities, issues being addressed, and emerging problems, at least once every six months. If necessary, information may be provided more frequently.
- **Operational Risk Register**
  In accordance with the provisions of Chapter VIII of the Port Authority's risk management policy and the directives of the Supervisory Board and the Director General, monitoring of risks greater than average is conducted every three months, while monitoring of average risks is conducted every six months.

Stakeholders

SBM-2

In 2025, the Klaipėda State Seaport Authority continued to consistently apply a structured stakeholder identification and engagement process, which is an integral part of the sustainability management system and the double materiality assessment. This process is based on the methodology applied in previous years and has been updated considering the results of the double materiality assessment conducted in 2025, through stakeholder surveys and taking into account the final assessment results.

Stakeholder Identification

Stakeholders are identified once a year or when significant changes occur to ensure that the Port Authority's activities align with the expectations, interests, and potential impacts of key stakeholders. The identification process is based on assessing how the Port Authority's activities affect different parties and how these parties can influence the organization's activities, decision-making, reputation, and the long-term continuity of the organization's operations.

The assessment takes into account the following key aspects:

- the potential positive or negative impact of the Port Authority's activities on stakeholders;
- the influence of stakeholders on the Port Authority's activities, strategic decisions, and reputation;
- the risks and opportunities related to activities that are material for long-term operational sustainability.
- the interests of stakeholders related to the development of the Port of Klaipėda, operational transparency, environmental protection, safety, and social aspects.

Based on this assessment, a list of key stakeholders was compiled, including both affected stakeholders and users of sustainability information. Affected stakeholders include employees, clients, users and end-users, suppliers and contractors, their employees, as well as local communities and the municipal authorities of Klaipėda city. The natural environment, which is directly or indirectly affected by the Port Authority's activities, is identified as a separate, silent stakeholder.

The group of sustainability information users includes the Port Authority's shareholder and government agencies, including the Ministry of Transport and Communications and the Supervisory Board, as well as the Director General and the Board, who are responsible for making strategic decisions and overseeing operations.

Identified stakeholders form the basis for ongoing dialogue, decision-making, and the shaping of the strategic directions and sustainability priorities of the Port Authority (see Figure 3).

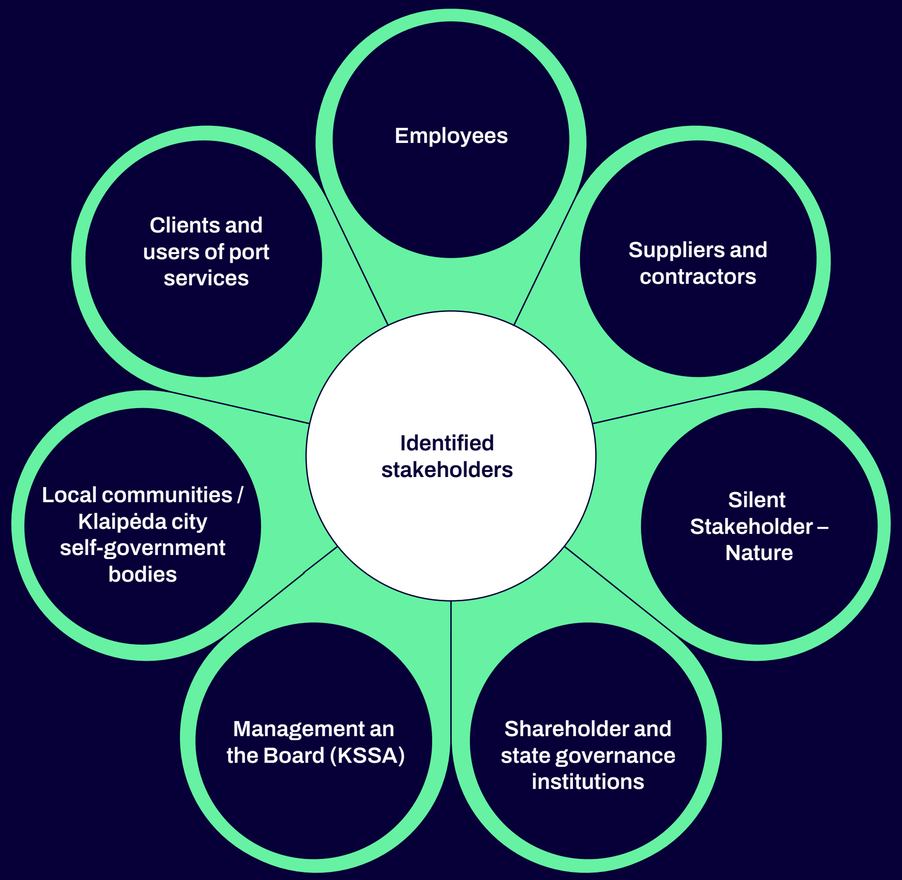


Figure 3. Stakeholders of the Port Authority

Principles of Stakeholder Engagement

Stakeholder engagement is designed to ensure an open, transparent, and constructive dialogue. The engagement process is based on the following principles:

- regularity and continuity;
- timely provision of information;
- mutual dialogue and ensuring feedback;
- integration of stakeholder expectations into operational planning.

Involvement of stakeholders in 2025

Surveys were conducted for the following groups of stakeholders:

- **Companies and tenants operating in the Port Area,** whose activities are directly related to port infrastructure and services. The surveys aimed to assess expectations, potential impacts, and risks associated with port operations. Expectations of other clients and users are additionally evaluated through ongoing NPS surveys.
- **Contractors and suppliers,** to assess the potential impact related to work execution, safety, environmental protection, and social aspects.
- **Affected communities,** by surveying community leaders and representatives. The surveys were focused on local residents' expectations regarding noise, environmental quality, safety, and the overall impact of port operations on the environment.

The content of the surveys was shaped based on pre-prepared questions and expectation letters directly related to the sustainability topics examined by the Port Authority and the context of double materiality assessment.

For some groups of stakeholders that are not direct clients of the Port Authority or whose impact is not direct (e.g., certain indirectly affected groups), surveys were not organized. In such cases, potential impacts, risks, and opportunities were assessed based on the expert knowledge of the Port Authority, available information, and experiences from previous periods.

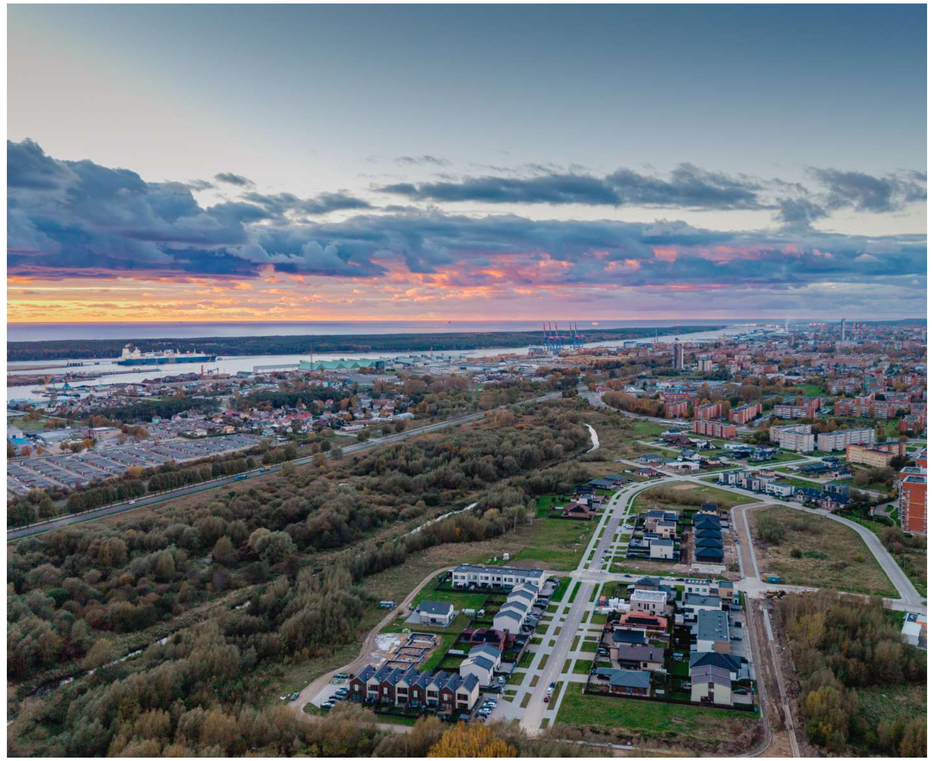
This differentiated inclusion method allowed for the effective collection of relevant information, ensuring proportionality and focusing on those stakeholders whose expectations and experienced impact are most significant in the context of the Port Authority's operations and sustainability strategy.

Feedback and continuous improvement

The information and feedback obtained during stakeholder involvement are used to improve operational processes, communication, and implement strategic initiatives. Considering the owner's expectations, applicable legislation, and changes in the operational environment, the Port Authority regularly reviews and updates its operational priorities and inclusion practices.

Informing management and supervisory bodies

The management and supervisory bodies are regularly informed of the views and interests of stakeholders during meetings and through reports prepared in accordance with the procedures set forth in the company's Articles of Association. By the decision of the Supervisory Board dated December 1, 2023, and the minutes of the meeting No. STP-20 dated January 2, 2024, the policy on transactions with related parties was approved to manage risks involving conflicts of interest and relationships with stakeholders.



Significance assessment process

IRO–1

The Klaipėda State Seaport Authority conducted a repeated double materiality assessment (hereinafter – DMA) in 2025, following the requirements of the European Sustainability Reporting Standards (ESRS) and the Corporate Sustainability Reporting Directive (CSRD), Directive (EU) 2022/2464. This assessment was an integral part of the sustainability management and strategic planning process, aimed at identifying the most significant environmental, social, and governance issues relevant to the company's operations, value chain, and stakeholders. The purpose of the assessment is to identify the company's material sustainability issues in the environmental, social, and governance areas that:

- have or may have a material actual or potential impact on people and the environment (impact materiality), and/or have or may have a material financial impact on the Port
- Authority's operations, financial condition, or performance (financial materiality).

The double materiality assessment process was prepared and implemented in accordance with the principles established by the ESRS and the practical application guidelines of the European Financial Reporting Advisory Group (EFRAG). The criteria for financial materiality were established based on the risk management methodology applied by the Port Authority, ensuring a consistent assessment of sustainability issues and strategic risks.

During the assessment, an analysis of the operational context was first conducted, covering the nature of the Port Authority's activities, core functions, value chain, sector characteristics, and legal environment. This analysis provided the basis for identifying potential material impacts, risks, and opportunities in the environmental, social, and governance areas.

Identified impacts, risks, and opportunities were evaluated based on their scale, expected occurrence period (short-term, medium-term, and long-term), and potential significance to the Port Authority's operations and stakeholders. Where possible, the assessment was based on available quantitative data, while in other cases, it relied on expert qualitative evaluations.

The assessment process involved the Port Authority's managers and specialists responsible for the relevant environmental, social, and governance areas, as well as external sustainability experts. After the internal assessment, a list of material sustainability topics, impacts, risks, and opportunities was compiled, which was reviewed and approved at the management level of the Port Authority.

The Port Authority recognizes that the double materiality assessment is an ongoing improvement process. Considering the changing regulatory environment, sector trends, and accumulated experience, the assessment methodology will be further developed and refined in the future to ensure the highest possible reliability of results and compliance with ESRS requirements.

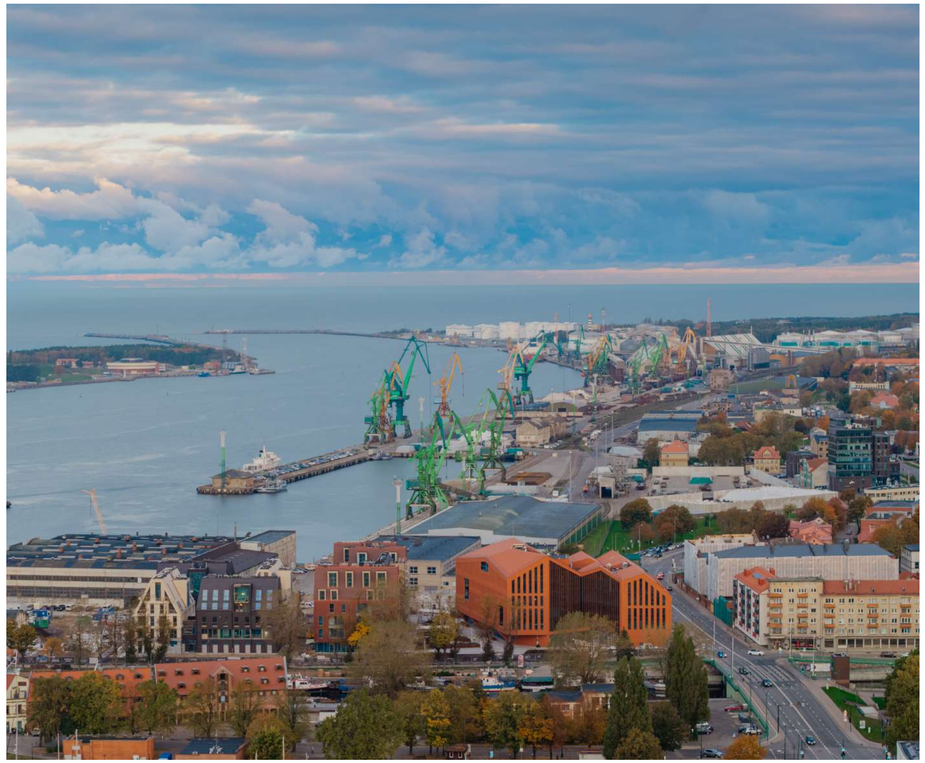
Overview of the double materiality assessment process

The double materiality assessment was conducted consistently, encompassing the following key stages:

1. Analysis of the operational context (business model, value chain, sector analysis).
2. Identifying existing and potential impacts, risks and opportunities.
3. Assessing the materiality of impacts, risks and opportunities.
4. Summary, revision and approval of materiality results.

The assessment process was organized based on available internal and external sources, including environmental impact assessments (EIA), data from the Klaipėda State Seaport environmental monitoring (2024 report), and additional information collected from stakeholder surveys.

The assessment process involved the heads and specialists of the Port Authority's divisions responsible for significant operational areas, as well as insights from external experts.



Methodology for the assessment of double materiality

The double materiality assessment method and process were developed in accordance with the requirements and guidelines of the European Sustainability Reporting Standards (ESRS). Since the ESRS does not establish a uniform mandatory methodology, the assessment process was shaped considering the nature of the Port Authority's operations, sector specifics, and previously applied best sustainability practices, utilizing insights from internal and external experts.

The double materiality assessment was conducted systematically, encompassing the analysis of the context of the Port Authority's operations, identification of significant actual and potential impacts, risks, and opportunities, evaluation of their significance, and review and validation of the results. During the assessment, both the materiality of the impact and the financial materiality were considered, as well as the interconnections between these two dimensions, as stipulated by the ESRS.

The assessment was based on available internal and external information sources, including the results of the environmental impact assessment (EIA), environmental monitoring data from the Klaipėda State Seaport (2024 report), and information collected during stakeholder surveys. The process involved responsible managers and specialists from the Port Authority, and insights from external experts were also utilized to ensure the quality of the assessment.

Analysis of the business context and value chain

At the beginning of the materiality process, an analysis of the operational context was conducted, covering the nature of operations, the value chain, stakeholders, and sector characteristics. This analysis allowed for the identification of key operational areas and connections that could lead to significant sustainability impacts, risks, or opportunities.

The value chain was analyzed from the initial to the final chain, including both the Port Authority's activities and business relationships with key resource suppliers, clients, and end users.

Additionally, a sector analysis was conducted based on the practices of the ports and maritime transport sector and international standards (ESPO, SASB, MSCI). This analysis helped identify topical areas that are most significant to port operations, including climate change, pollution, biodiversity, social relations, and port safety.

Stakeholder engagement

In the materiality assessment process, a stakeholder analysis was conducted, encompassing the expectations of employees, managers, local communities, clients, contractors, and government institutions. The double materiality assessment was carried out not only based on insights gathered during ongoing communication with stakeholders but also through targeted stakeholder surveys that included significant stakeholder groups. The insights obtained were used to assess impacts, risks, and opportunities and to justify the materiality of topics for stakeholder groups.

Identification and assessment of impacts, risks, and opportunities

The process of identifying and assessing material impacts, risks and opportunities involved the heads of departments and specialists responsible for activities related to material sustainability topics. The assessment covered both impacts arising from the operations conducted by the Authority and impacts related to business relationships in the value chain.

In assessing sustainability topics, the list of topics to be included in the materiality assessment provided by the ESRS was taken into account (ESRS 1, TR 16). The significance of each sustainability issue was assessed individually, taking into account the specifics and circumstances of the activities, based on the most objective information available and expert evaluations.

Impacts, risks, and opportunities were evaluated over short, medium, and long-term periods that align with the definitions set by the ESRS.

Impact assessment

A sustainability issue is considered material in terms of impact when it relates to the Company's material actual or potential, positive or negative impact on people or the environment in the short, medium and long term, assessing the impact from an "inside-out" perspective.

The assessment of materiality was based on the general criteria of the European Sustainability Reporting Standards (ESRS), as outlined in ESRS 3.2, "Material Matters and Materiality of Information", as well as the practical application guidance from the European Financial Reporting Advisory Group (EFRAG).
The materiality of actual negative impact was assessed in terms of severity, and that of potential negative impact - in terms of severity and likelihood. The strength of the impact was determined by evaluating three main components: the scale of the impact, its scope, and its irreparable nature.

In assessing the potential negative impact on human rights, greater weight was given to the strength of the impact compared to its likelihood, in accordance with ESRS recommendations. In this context, additional weights were applied in the assessment of human rights-related issues, increasing the materiality of the strength of the impact in the overall materiality assessment.
The materiality of a positive impact was assessed based on the magnitude and scope of the impact in the case of an actual impact, and based on the magnitude, scope, and likelihood of the impact in the case of a potential impact.

The materiality scores for impacts were calculated by multiplying the likelihood and impact strength. The strength of the impact was composed of the average of three components – scale, scope, and irreparability – to which an additional weight was applied. In cases where the strength of the impact was assessed as very low or low, the overall materiality of the impact assessment was proportionally reduced by applying a corrective coefficient, even in the presence of a high likelihood of impact.

The criteria and scoring system applied for the assessment of impact materiality is presented in the table below.

Probability		Strength					
Probability	**Score**	**Scale**	**Score**	**Scope**	**Score**	**Irreparable nature**	**Score**
The impact is already occurring / Very high	5	Very high	5	Very widely spread	5	Irreparable	5
High	4	High	4		4	Difficult to correct and (or) restore	4
Medium	3	Medium	3	Moderately widespread	3	Repairable (time and money)	3
Low	2	Low	2		2	Easily repairable	2
Very low	1	Very low	1	Localised/ local	1	Very easily repairable	1
Strength*				1.20			

*A weight of 1.2 means that the strength weight is 20% greater than the probability. Formula: the unrounded average of strength scores multiplied by 1.2.

Assessment of financial effects

Financial materiality is assessed considering the connections of sustainability issues with risks and opportunities that may have in the future a material impact on financial condition, operational results, or cash flows in the short, medium, and long term (perspective from outside to inside).

In conducting the assessment of financial impact, risks and opportunities arising from both identified impacts and dependencies on the environment and people, as well as from other factors, including changes in the regulatory environment, technological advancements, changes in market conditions, reputational aspects, and factors affecting the availability of funding were analyzed.

During the determination of financial materiality, risks and opportunities were evaluated based on two main criteria: the likelihood of occurrence and the scale of potential financial impact. Both quantitative and qualitative criteria were applied for the assessment. In cases where the financial impact could not be reliably assessed in quantitative terms, a qualitative assessment scale was applied.

The scale of criteria for assessing financial impact and the logic of score assignment are presented in the table below.

Probability		Financial impact	
Probability	**Score**	**Scale**	**Score**
Very high	5	Vey high	5
High	4	High	4
Medium	3	Medium	3
Low	2	Low	2
Very low	1	Very low	1

Criteria for assessing financial impact and score assignment system

The financial materiality score is calculated by multiplying the probability and the scale of the financial impact. This assessment allows for the identification of sustainability topics that may have a material impact on financial results due to investment needs, changes in operational costs, potential fines or sanctions, financing conditions, as well as reputation and stakeholder relationships.

The assessment of financial impact has been aligned with the applicable operational risk assessment methodology, ensuring consistency between the double materiality assessment and other risk management processes. Some topics and their assessments have been transferred from the periodically conducted operational risk assessment, considering their relevance in the sustainability context.

Frequency of significance assessment

Materiality at the Port Authority is assessed as a regular and flexible process that ensures the relevance of sustainability topics. The assessment is conducted at least every two years, and in the event of significant changes in the organization's operations, regulatory environment, or stakeholder expectations, it is conducted more frequently.

The repeated double materiality assessment conducted in 2025 allowed for the refinement and expansion of the list of material impacts, risks, and opportunities, ensuring that it reflects the current situation of the Port Authority's operations and external environment.

Decision-making process and related internal control procedures

1. A strategic session is organized with the company's leading employees, during which essential strategic topics are clarified.
2. A strategic session is organized with the Supervisory Board and the Board, during which expectations regarding the development of the Strategic Action Plan and other planning documents are expressed and heard.
3. A draft Strategic Action Plan is being prepared, taking into account the results of the strategic sessions, the letter of expectations from the state-representing institution, long-term sectoral and state strategies related to the sector, as well as regional and global trends.
4. The draft of the Strategic Action Plan is coordinated in the company's Board and Supervisory Board.
5. The draft of the Strategic Action Plan and other planning documents, coordinated with the company's management and supervisory bodies, is submitted for evaluation to the GCC.
6. Upon receiving the evaluation from the GCC, the draft of the Strategic Action Plan is adjusted according to the comments received from the GCC (if any) and submitted for approval to the Supervisory Board.
7. The approved Strategic Action Plan is made public (to the extent that it does not contain commercial secrets and restricted-use information).
8. The goals, objectives, and measures set in the Strategic Action Plan are integrated into the annual goals of the company's employees.
9. The Strategic Action Plan is implemented in accordance with the company's internal regulations and control procedures, including primary and secondary budget control.
10. Information on the implementation of the Strategic Action Plan is provided to the state-representing institution, GCC, the Board, and the Supervisory Board.

Results of the double materiality assessment

IRO-2

Following the repeated double materiality assessment, sustainability issues deemed significant for the activities of the Klaipėda State Seaport Authority were identified, both in terms of impact on people and the environment, as well as from a financial perspective. The evaluation results form the basis for the disclosure of sustainability information in 2025 according to the requirements of the European Sustainability Reporting Standards (ESRS).

Topics considered material are those that have reached a medium or high level of materiality according to at least one of the two evaluation dimensions – impact materiality or financial materiality.

The evaluation results showed that the most material topics in the environmental area are climate change and energy, as well as air pollution, which have both actual and potential material impacts. Medium materiality topics include biodiversity, water and soil pollution, and resource use. These topics are directly related to port operational activities, infrastructure development, and long-term environmental impact.

In the social area, topics identified as material are related to employee health and safety, skills development, work-life balance, social dialogue, diversity, and employer reputation. A material impact of the Port Authority's activities on local communities has also been identified, particularly through infrastructure projects, environmental factors, and community engagement. Medium importance topics related to gender equality and labor shortages.

In the governance area, material topics include organizational culture, supplier relationship management, port infrastructure quality and sustainable development, and the prevention of corruption and bribery. Cybersecurity is also identified as a topic of high financial risk. These topics are essential for ensuring operational transparency, resilience, continuity, and public trust in a state-owned enterprise.

The results of the double materiality assessment are graphically presented in a double materiality matrix. In the double materiality matrix, sustainability topics relevant to the Authority are arranged by importance, reflecting identified impacts, risks, and/or opportunities. The vertical axis of the matrix indicates the materiality of impact on people and the environment, while the horizontal axis indicates financial materiality. All topics of high and medium materiality are considered material.

2025 Matrix of topics of relevance to the Port Authority

Materiality of impact	Not determined	Low	Medium	High
High	S1 Own workforce: Social dialogue (FP-, FP+), Work-life balance (●+), Diversity (○-) G1 Business conduct: Management of relationships with suppliers (○+)	E2 Pollution: Air pollution (FP-, GP+) S1 Own workforce: Employee health and safety, (●-, ○-, ●+), Training and skills development (●+) G1 Business conduct: Corporate culture (●+)	S3 Affected communities (●-, ●+, ○+, !)	E1 Climate change: Climate change mitigation and energy (●-, ○+, !, ?) Port infrastructure quality and sustainable development (●+, !, ?)
Medium	E5 Circular economy: Resources inflows, including resource use	E4 Biodiversity and ecosystems: Direct factors affecting biodiversity loss (○-, ●+)	G1 Business conduct: Corruption and bribery (○-, !) Diversion and sabotage (○-, !) E2 Pollution: Water pollution (●-, !) E2 Pollution: Soil pollution (●-, !)	E1 Climate change: Adaptation to climate change
Low	E3 Water and marine resources E5 Circular economy: waste		S1 Own workforce: Gender equality and equal pay for equal work (!)	Cybersecurity (!)
Not determined	S2 Workers in the Value Chain S4 Consumers and end users G1 Business conduct: Whistleblower protection, Animal welfare (not relevant), Political engagement (not relevant)		S1 Own workforce: Labor force shortage (A1) (!)	S1 Own workforce: Employer reputation (?)

Financial materiality

- Social scope
- Enviromental scope
- Governance

(●-) Actual negative impact

(●+) Actual positive impact

(○-) Possible negative impact

(○+) Possible positive impact

(!) Risk

(?) Opportunity

List of most material topics: in terms of double materiality assessment

SBM-3

ESRS	Topic	Sub-topic	Page
E1	Climate change	Climate change mitigation and energy transition	32
		Adaptation to climate change	36
E2	Pollution	Water pollution	49
		Soil pollution	51
S1	Affected communities	Impact on local communities	85
G1	Business conduct	Corruption and bribery	95
	Governance	Diversion and sabotage	98
		Port infrastructure quality and sustainable	100

In this report, each material topic is described separately, applying its specific and relevant disclosure requirements, indicating where the impacts, risks, and opportunities are concentrated in the Port Authority's value chain.

List of other topics: in terms of finance or environmental

ESRS	Topic	Sub-topic	Page
Relevant topics on environmental impacts			
E2	Pollution	Air pollution	54
Material topics regarding impact on society			
S1	Own workforce	Occupational health and safety	83
		Training and skills development	82
		Social dialogue	81
		Work-life balance	84
		Diversity	82
Material topics regarding business ethics			
G1	Business conduct	Management of relationships with suppliers	94
		Corporate culture	93
Topics of moderate materiality regarding environmental impact			
E4	Biodiversity and ecosystems	Direct factors contributing to biodiversity loss	56
E5	Circular economy	Resource inflows, including resource usage	59
Topics of low materiality			
E3	Water and marine resources	Water resources	Not disclosed*
E5	Circular economy	Waste	60
Insignificant topics			
S2	Workers in the value chain	All sub-topics	Not disclosed
S4	Consumers and end-user	All sub-topics	Not disclosed
G1	Business conduct	Animal welfare (not relevant)	Not disclosed
G1	Business conduct	Political engagement and lobbying activities	Not disclosed
G1	Business conduct	Protection of whistleblowers	Not disclosed

* "Not disclosed" – the topic has been identified as of little significance or not relevant; it is not discussed separately in the report.

Comparative analysis of the materiality assessment results for 2024 and 2025

To ensure the consistency and comparability of double materiality assessments over time, a comparative analysis of the most material sustainability topics for 2024 and 2025 was conducted. The aim of the analysis is to evaluate which sustainability topics remained significant in both assessment periods, how their content, structure, or level of detail changed, and to identify material topics from 2024 that were not reassigned among the most significant in terms of double materiality.

Additionally, the analysis assessed new or more detailed topics that were identified as material in 2025, considering the changed operational context, nature of risks, stakeholder expectations, regulatory environment, and relevant impacts on the environment, society, and the financial position of the Port Authority.

The comparative analysis was conducted based on the results of the double materiality assessments for 2024 and 2025, prepared in accordance with the European Sustainability Reporting Standards (ESRS), applying a consistent assessment methodology, internal and external data sources, and stakeholder insights. The results of the analysis are presented in the tables below, separately highlighting the most material topics regarding double materiality and other material topics directly related to the operational areas, impacts, and responsibilities of the Port Authority.

Comparison of the most material topics based on double materiality for 2024 and 2025

The comparative analysis of the materiality assessment results for 2024 and 2025 shows an overall continuity of material topics, while highlighting structural and detail changes of individual topics. Some topics remained material in both periods, but in the 2025 assessment, their sub-topics were refined, considering the changed nature of impacts, relevant risks and opportunities, and improved data availability. Some material topics from 2024 were not re-identified as the most material in 2025 according to double materiality, but they remained important and were moved to the list of other material topics. The 2025 assessment also highlighted new or more clearly defined topics reflecting changing regulatory requirements, operational context, and stakeholder expectations.

ESRS area	Topic	2024 material sub-topics	2025 material sub-topics	Nature of change	Explanation
E1	Climate change	Energy transition	Mitigation of climate change and energy transition; Adaptation to climate change	Expanded	In 2024, the topic focused solely on the energy transition, primarily related to energy consumption and infrastructure solutions at the port. In 2025, the topic was expanded to include climate change mitigation, with the aim of fully reflecting GHG emission reductions, climate policy objectives, and the port's role in national and EU climate commitments. Additionally, adaptation to climate change was identified, considering physical climate risks.
E2	Pollution	Air pollution	Water pollution; Soil pollution	Clarification of the scope of the topic	In the 2024 assessment, the topic of pollution was assessed broadly, with a particular focus on air pollution. In the 2025 assessment, the topic was specified and broken down according to the main types of environmental impact – water and soil pollution, considering their significance to port activities and identified specific sources of impact.
S1	Own workforce	Working conditions		Moved to the list of other material topics	In 2024, the topic was included among the most material based on double materiality. In 2025, the S1 sub-topics were not classified as the most material topics in terms of double materiality, but identified as other material topics, considering their importance to the Port Authority's activities and human resource management, albeit with relatively lower financial materiality.
S3	Affected communities	Friendly relations with the local community	Impact on local communities	Maintained/clarified	The topic remains material in both assessment periods, considering the ongoing impact of the Port Authority's activities on local communities.
G1	Governance	Business conduct; Diversion and sabotage; Cybersecurity	Corruption and bribery; Diversion and sabotage;	Detailed	In the 2025 assessment, governance remains a material topic but has been further specified, with a focus on the prevention of corruption and bribery, as well as the risks of diversion and sabotage. This reflects a greater focus on the security, transparency, and resilience of critical infrastructure in the context of geopolitical and security challenges.
G1	Governance	Port infrastructure quality and sustainable development	Port infrastructure quality and sustainable development	Maintained	The topic remains significant, considering the ongoing infrastructure development projects, the strategic importance of the port to the economy, and the long-term impact on the city, region, and state.

Other material topics by impact or financial materiality: Comparison for 2024–2025

Below is a comparative analysis of other material sustainability topics for 2024 and 2025. It reveals how, considering the changed nature of impacts, the scale and manageability of risks, some topics have been integrated into other material areas, reclassified, or newly highlighted. The analysis shows that in the 2025 assessment, greater attention was given to topics characterized by long-term, systemic impact across the value chain or significant reputational and governance risk, while topics whose impact is considered more manageable or without new significant changes were assessed as lower significance or included in the context of broader topics. This allows for a consistent justification of materiality changes and ensures the logic of assessment over time.

ESRS area	Topic	2024 material sub-topics	2025 material sub-topics	Nature of change	Explanation
E2	Pollution	Noise pollution; Soil pollution; Water pollution	Air pollution	Change in topic priorities	In 2024, the topics of noise, soil, and water pollution were considered material. In the 2025 assessment, the priority has shifted to air pollution, considering the ongoing actual and potential negative impacts on the environment and public health arising from shipping and other mobile pollution sources in the value chain. A significant portion of the pollution is associated with vessels docked in the port, which generate energy from fossil fuels, therefore it is likely that the impact will remain medium to long-term. Noise and soil pollution are considered more controllable and are no longer included among the most material sub-topics.
E3	Water and marine resources	Water resources		Integrated into other topics	The topic of Water and Marine Resources was not identified as separately material in 2025, as water-related impacts and risks are integrated into other environmental topics, primarily in the context of pollution and biodiversity. The impact of water pollution remains manageable through existing technical and organizational measures, including environmental monitoring, preventive procedures, and infrastructural solutions. In 2025, no new incidents or significant operational changes were identified that could significantly increase the impact or financial risk, therefore this topic is not singled out as independent, and its aspects are evaluated within the context of other significant environmental topics.
E4	Biodiversity and ecosystems	Impact on the condition of species and ecosystems	Direct factors contributing to biodiversity loss	Detailed and materiality reduced	In 2024, the topic was considered material due to the potential impact on the condition of species and ecosystems. In 2025, the materiality was reduced to medium, as no direct negative impact of the Port Authority's activities on protected areas or biodiversity was identified. Monitoring data do not show significant deterioration in species status, and the preventive and responsive measures applied (monitoring, EIA procedures, prompt response to pollution incidents) allow for the management of potential impacts. Identified challenges are mainly related to historical contamination and the spread of non-native species, whose origin is not directly linked to the activities of the Port Authority.
E5	Circular economy	Waste	Resource inflows, including resource usage; Waste	Adjusted scope of the topic	In 2024, the topic was focused on the impact of waste on the environment. In the 2025 assessment, the emphasis has shifted to resource use, which remains moderately material due to the development of port infrastructure. The materiality of the waste sub-topic has been reduced, as the Port Authority has implemented an effective waste collection and management system, and additional measures (waste collection, transfer to licensed operators) reduce impacts and risks.
S1	Own workforce		Occupational health and safety; Training and skills development; Social dialogue; Work-life balance; Diversity	Reclassified into other material topics	In 2024, the S1 sub-topic Working Conditions was identified as a material topic in terms of double materiality assessment. In 2025, working conditions and other sub-topics were classified as material topics due to their impact on employees and society; however, due to their relatively lower financial materiality, they are no longer considered among the most material topics.
S2	Workers in the value chain	Equal treatment and equal opportunities for all, including physical and emotional health		The topic is no longer identified as material.	In 2024, the topic was assessed as moderately material. In 2025, it was not identified as material, as no relevant actual or potential negative impacts on employees were found in the value chain. Over the past year, no incidents of violations related to the rights of employees or working conditions in the value chain have been recorded. Additionally, risk management is ensured by the applicable Business Partner Code of Conduct, which requires service-providing companies to ensure proper working conditions and comply with applicable laws.
G1	Governance		Management of relationships with suppliers; Corporate culture	Newly identified material sub-topics	In 2024, the management of supplier relationships and corporate culture sub-topics were not highlighted as separate material sub-topics in the double materiality assessment. In 2025, these sub-topics were identified as material, considering their direct impact on business ethics, transparent operational practices, decision-making culture, and reputational risk, as well as the increasing focus on supply chain accountability and governance maturity.

Sustainability strategy

SBM–1

The Klaipėda State Seaport Authority's sustainability strategy is integrated into the overall development and operational strategy of the organization and the 2035 port development vision. The strategy sets out priority environmental, social, and governance directions that allow for the management of material impacts, risks, and opportunities, contributing to the port's competitiveness, resilience, and long-term value creation.

The strategy has been developed in accordance with the EU Green Deal directions, the results of the repeated double materiality assessment, national sustainability goals, and European sustainability reporting standards (ESRS), ensuring that the Port Authority's activities align with long-term climate change mitigation, social responsibility, and transparent governance objectives.

The Sustainability Strategy covers the period from 2026 to 2029 and is based on a long-term vision extending to 2035. The strategy applies to the activities managed and controlled by the Port Authority, the development and operation of the Port of Klaipėda's infrastructure, as well as business relationships related to port activities in cases where the Port Authority can have a material impact on environmental, social, or governance aspects.

Sustainability strategy priorities

The sustainability strategy of the Klaipėda State Seaport Authority is based on clearly defined strategic priorities that reflect the Port Authority's role in managing port infrastructure, impacting the environment, society, and economy, and ensuring long-term operational resilience. The strategy identifies three interrelated key sustainability priorities encompassing environmental, social, and governance aspects.

1. A port implementing and promoting green transition

This priority aims to significantly contribute to climate change mitigation, reduce greenhouse gas emissions, and promote the energy transition at the Port of Klaipėda. The Port Authority takes on a leadership role in implementing technological, infrastructural, and organizational solutions that create conditions for developing a green port.

Main objectives:

- to reduce CO_2 emissions from the Port of Klaipėda and the Port Authority, consistently aiming for long-term goals by 2035;
- to promote the use of renewable energy in port infrastructure and the activities of the Port Authority;
- to modernize infrastructure, enabling lower emissions from vessels (e.g., onshore power supply);
- to renew the fleet by implementing electric, hybrid, and hydrogen-powered technologies;
- to develop hydrogen and other alternative fuel solutions in port operations;
- to ensure consistent calculation, monitoring, and public disclosure of GHG emissions.

Links to the UN Sustainable Development Goals: 7, 9, 13, 14.

2. Employees realizing talents and empowered local communities

This priority is focused on social sustainability – employee well-being, safety, professional development, and constructive dialogue with local communities. The Authority aims to be an attractive employer and a responsible neighbor, whose activities create long-term value for society.

Main objectives:

- to increase employee engagement, job satisfaction, and the development of professional competencies;
- to ensure a safe working environment and zero tolerance for accidents;
- to strengthen an organizational culture based on trust, inclusion, and equal opportunities;
- to encourage local communities' involvement in decisions related to port activities;
- to ensure transparent and consistent information provision about the Authority's projects and their impact on the environment and society;
- to support local communities and social initiatives.

Links to the UN Sustainable Development Goals: 3, 4, 5, 8, 11.

3. A transparent and ethically operating organization and sustainable infrastructure

This strategic priority encompasses ensuring governance quality, organizational resilience, and compliance. The Authority seeks to strengthen trust among stakeholders, ensure high ethical standards, and develop port infrastructure sustainably.

Main objectives:

- to maintain a corruption-resistant environment in all areas of activity;
- to ensure compliance with sanctions, restrictive measures, and legal requirements;
- to enhance cybersecurity, information security, and personal data protection;
- to manage risks of diversion and sabotage, ensuring the continuity of port operations;
- to integrate circular economy principles into infrastructure development;
- to develop sustainable port infrastructure aligned with environmental, social, and economic goals;
- to strive for compliance with EU taxonomy requirements.

All sustainability strategy priorities and goals are interconnected and complement each other. Environmental solutions enhance the competitiveness of the port, social responsibility increases the resilience of the organization, and transparent governance lays the foundation for long-term trust and sustainable development.

Links to the UN Sustainable Development Goals: 9, 11, 16, 17.

Environmental information

Climate change: Climate change mitigation and energy 32

Pollution 49

Biodiversity and ecosystems 56

Resource use and circular economy 59

Disclosure of information according to the EU Taxonomy Regulation 61

Climate change: Climate change mitigation and energy

Climate change mitigation and the transformation of the energy sector are among the key measures aimed at reducing greenhouse gas emissions and the long-term negative impact on the environment. Assessments by international organizations, including the Intergovernmental Panel on Climate Change (IPCC), the International Energy Agency (IEA), and the United Nations Framework Convention on Climate Change (UNFCCC), indicate that the energy sector remains the largest source of GHG emissions globally, making its decarbonization essential for achieving climate neutrality goals.

The activities of the Klaipėda State Seaport Authority are closely related to significant energy consumption and infrastructure operation, thus the aspects of energy and climate change mitigation are an integral part of the company's environmental policy. In carrying out its assigned functions and considering national and European Union climate policy objectives, the company is consistently striving to reduce emissions generated during operations, increase energy efficiency, and promote the transition to energy solutions with a lower environmental impact.

This section provides information on the climate change mitigation measures applied by the company in the energy sector, the structure of energy consumption, the efficiency improvement solutions being implemented, and progress towards long-term climate change reduction goals, in accordance with the requirements of the European Sustainability Reporting Standards (ESRS).

Disclosure Requirements List

IRO-2

ESRS 2	General Disclosures	Reference
IRO-1	Description of the processes to identify and assess significant climate-related impacts, risks, and opportunities	33
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	34
E1-1	Transition plan for climate change mitigation	37
E1-2	Policies related to climate change mitigation and adaptation	40
E1-3	Actions and resources in relation to climate change policies	41
E1-4	Targets related to climate change mitigation and adaptation	38
E1-5	Energy consumption and mix	45
E1-6	Total GHG emissions at Scope 1, 2, and 3 and their overall amount	46
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	48
E1-8	Internal carbon pricing	48
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	37, 48

Material impacts, risks, and opportunities related to climate change mitigation and energy

IRO-1

According to the double materiality assessment, climate change mitigation and energy transformation are material topics for the company in terms of both environmental impact and financial risks and opportunities. The activities of companies operating in the port area, including shipping, cargo turnover, logistics, and other related operations, generate GHG emissions. These emissions are classified as Scope 1 and 3 for port companies, but in the case of the Port Authority, they are classified as Scope 3 emissions, as they occur in the value chain. Therefore, the material impact of the Port Authority's climate change is associated with Scope 3 GHG emissions arising from the activities of port users and other participants in the value chain.

In the context of the value chain, the greatest impact on the climate stems from vehicles and vessels that use fossil fuels, the operation of energy infrastructure, the activities of companies operating within the port area, and GHG emissions from vessels entering the port.

Although the company is implementing energy transformation measures, a complete abandonment of fossil fuels is currently not technically feasible. Vessels operating in the internal port waters can gradually be converted to vessels powered by alternative energy sources; however, vessels that must also operate safely outside the port require dual-function engines. Therefore, some GHG emissions remain structurally unavoidable in the short- and medium-term.

At the value chain level, a significant portion of emissions consists of Scope 3 GHG emissions emitted by vessels arriving at the port. Considering that the global and Baltic Sea fleet will remain dependent on fossil fuels in the near future, the reduction of these emissions will depend not only on the company's actions but also on the broader pace of sector transformation and changes in the regulatory environment.

From a financial materiality perspective, climate change mitigation is associated with the need for significant investments to modernize energy and port infrastructure, the costs of implementing decarbonization technologies, potential regulatory changes (e.g., emissions pricing, fuel standards), physical climate change risks to port infrastructure, and reputational and competitive risks. The company is committed to contributing to carbon neutrality goals by 2050; therefore, climate change mitigation and energy transformation measures are integrated into strategic planning, investment decisions, and risk management systems. Energy transformation is viewed as a long-term strategic direction encompassing the reduction of GHG emissions, increasing energy efficiency, and integrating renewable energy sources.

This section provides a more detailed analysis of the material impacts, risks, and opportunities related to climate change mitigation and energy (IRO-1), detailing the main sources of GHG emissions and the measures implemented by the company to reduce these emissions.

Main areas of emissions formation in the value chain

In the operations of the Port Authority, GHG emissions occur at different stages of activity and parts of the value chain. Considering the nature of emission sources and the level of control, they are divided into three main scopes: direct emissions from the activities carried out by the Port Authority (Scope 1), indirect emissions from consumed energy (Scope 2), and emissions generated in the value chain related to the activities of companies operating in the port area (Scope 3).

The table presented summarizes the main areas of emission formation and their sources in the value chain of the Klaipėda Seaport Authority.

GHG EMISSION LEVELS

Emissions are divided into 3 levels based on the level of impact and scope of control

EMISSION SCOPE	MAIN SOURCES	DESCRIPTION
SCOPE 1	Vessels, vehicles, and other equipment of the Port Authority	The vessels, vehicles, and other equipment operated by the Port Authority use fossil fuels, resulting in direct GHG emissions.
SCOPE 2	Electricity consumption, thermal energy for building heating	From July 2025, the Port Authority uses green electricity in its operations. Until then, electricity generated from non-renewable energy sources was used, which resulted in emissions associated with electricity production in the supply chain.
SCOPE 3	Activities of companies operating in the port area	The activities of shipping, loading, and logistics companies operating in the port area generate GHG emissions related to fuel use in vehicles, loading equipment, and other machinery, as well as electricity and thermal energy consumption. In relation to the Port Authority, these emissions are classified as Scope 3 emissions, as they occur within the value chain.

Electricity consumption in the port value chain

According to 2025 data, 22 companies operating in the port area consumed a total of 60,298 MWh of electricity, of which 44,806 MWh or 74.31% was electricity from renewable energy sources. This indicates consistent progress in reducing indirect GHG emissions and strengthening the port's resilience to climate change within the value chain.

Infrastructure solutions for reducing emissions

The Port Authority is implementing infrastructure modernization measures aimed at alternative fuels and climate change mitigation. Infrastructure projects for onshore power supply (OPS) are being carried out at the Port of Klaipėda, creating opportunities to reduce the amount of pollutants emitted by vessels.

In 2025, an onshore power supply station was installed for the Port Authority's vessels, and its operation is expected to commence in the second half of 2026. Further development of OPS infrastructure is planned for 2026, including the installation of four additional stations for Ro-Ro and Ro-Pax ferries, in line with strategic planning documents.

Simultaneously, onshore power supply infrastructure is being developed, and other solutions promoting green transformation are being implemented, including renewable energy technologies and infrastructure for hydrogen production and public refueling stations. Currently, the process of signing a contract for the design services of onshore power supply (OPS) infrastructure for cruise ships is underway.

SBM-3

Material impacts	Description	Location in the value chain
Actual negative impact	GHG emissions occurring throughout the value chain contribute to climate change. Emissions are related to port operations, transportation, energy consumption, and client activities within the port area.	The entire value chain
Potential positive impact	Onshore power supply (OPS), green energy projects, including the production of green hydrogen and infrastructure development, create conditions for reducing emissions, increasing energy efficiency, and promoting the transition to less polluting solutions.	Final
Risk	Insufficient demand for green hydrogen may reduce the economic efficiency of planned investments and lead to financial consequences.	Direct activity
	Failure to achieve climate neutrality targets by 2050 may pose risks of financial sanctions, regulatory pressure, and reputational damage.	Direct activity
	Insufficient external funding or slower investment returns may hinder the implementation of infrastructure projects necessary for regulatory compliance and achieving strategic goals (e.g., OPS infrastructure).	Direct activity
Opportunity	Green energy projects can enhance the organization's reputation, contribute to the implementation of the Green Port concept, and create conditions for additional revenue.	Direct activity
	Effective reduction of GHG emissions and environmental impact management increases opportunities to attract EU and other external funding for sustainability projects.	Direct activity

Climate change analysis and its impact on the Port of Klaipėda

The geographical location of the Klaipėda State Seaport on the Baltic Sea coast, adjacent to the Curonian Lagoon and the Curonian Spit National Park, results in greater sensitivity to the physical impacts of climate change. The Klaipėda State Seaport is one of the most important transport infrastructure facilities in the Republic of Lithuania and a significant part of the European Trans-European Transport Network (TEN-T), thus the impact of climate change may significantly affect both the resilience of port infrastructure and operational activities, as well as broader regional and international logistics chains.

The climate change analysis was conducted based on long-term hydrometeorological data and information provided in environmental impact assessment (EIA) reports regarding the state of the environment and potential operational impacts, as well as information from the Klaipėda Port Environmental Review System (PERS) environmental report on significant environmental aspects and the impact of port operations on the environment, along with the climate risk and vulnerability assessment of the Pathways2Resilience (P2R) programme for 2024–2025. The latter analyzes climate-related scenarios developed based on the analysis of long-term meteorological and hydrological process data, assessing projected changes and their potential impact on port infrastructure and operations.

Based on the conducted climate risk and vulnerability analysis, key climate factors that may significantly impact the infrastructure, operational activities, and logistics chains of the Klaipėda State Seaport were identified. The table below summarizes the main climate factors, affected areas of port operations, potential impacts, and identified climate risk scenarios.

Climate risks at the Port of Klaipėda

Climate factor	Affected location	Affected object or activity	Risk level	Worst-case scenario (by 2070)	Risk manager
Roughness, windiness, wave action, currents	Mainly the northern part of the port	Navigation and mooring	Very high	5–7.5 m high waves at the port gates during storms	Harbour Master Office
Roughness, windiness, wave action	Entire port area	Military mobility	Very high	~150 days per year of vessel movement restrictions	National level
Roughness, windiness, wave action	LNG terminal	LNG terminal operations	Very high	~150 days per year of vessel movement restrictions	KN Energies / National level
Sedimentation	Internal water area	Navigation, mooring, cargo turnover	Very high	>20% more intense average sediment deposition	Infrastructure Department
Roughness, windiness, wave action, currents	Mainly the southern part of the port	Cargo turnover operations	High	~55 days with wind speeds exceeding 20 m/s per year	Cargo turnover companies and terminal operators
Rising sea level	Entire port area	Mooring, cargo turnover operations	High	2.2–3.0 m rise in sea level in the water area during severe storms	Cargo turnover companies and terminal operators

The threats of climate change to the Port of Klaipėda usually manifest not in isolation but due to interactions, so their overall impact can be significantly greater than the impact of individual factors. For example, episodes of severe storms coinciding with elevated water levels in the Curonian Lagoon can significantly increase the overall flood risk and their potential impact on port infrastructure and operations.

The operational model of the Klaipėda State Seaport Authority, based on long-term (up to 50 years) land leases to private terminal operators, means that the risks posed by climate change affect not only the infrastructure directly managed by the KSSA but also the commercial activities of port tenants and the entire port value chain.

In order to systematically manage identified climate risks, in 2024 the KSSA joined the European Union initiative “Pathways2Resilience” (P2R) programme. The Port of Klaipėda is the only seaport among 40 European regions participating in this programme. As part of the programme’s activities, it is planned to prepare a long-term port climate adaptation strategy by 2026, as well as specific action and investment plans.

Climate adaptation is considered by the KSSA as a strategically important long-term investment aimed at ensuring the resilience of port infrastructure, continuity of operations, and maintaining the role of the Port of Klaipėda in the economy of the Republic of Lithuania and in European transport and logistics chains.

E1-9

Based on the double materiality assessment conducted during the analysis of climate risks and opportunities, it was found that climate change can have both negative and positive financial impacts on the activities, infrastructure, and long-term investment decisions of the Klaipėda State Seaport Authority. The assessment analyzed the timeframe, probability, and potential financial impact of physical and transition risks, as well as climate-related opportunities.

Financial impact of physical climate risks

The most significant physical climate risks are associated with the effects of storms, windiness, wave action, and rising sea levels on port infrastructure and operations. These risks can lead to additional costs for infrastructure maintenance, repair, and adaptation, as well as potential disruptions to operational activities. When assessing the potential financial impact, it was determined that it could range from low to medium financial range limits (up to 5 million EUR), depending on the intensity of climate phenomena and the need for infrastructure adaptation.

Financial impact of transition risks

Regulatory and technological changes related to climate change mitigation may lead to a need for additional investments in low-carbon energy infrastructure and alternative fuel solutions in the port area. The financial impact of these changes is assessed to be at a medium range level (about 0.5–5 million EUR) and is primarily related to investments in infrastructure modernization and energy system transformation.

The Financial Impact of Climate-Related Opportunities

Climate change mitigation policy also creates opportunities for the expansion of operations of the Port of Klaipėda. The greatest opportunities are associated with the development of green energy projects, the development of alternative fuel infrastructure, and initiatives for green shipping corridors in the Baltic Sea region. These initiatives could have a positive financial impact, potentially amounting to a moderate or significant financial gain (ranging from EUR 0.5 million to over EUR 5 million) due to new investments, additional sources of revenue, and increased port competitiveness.

The financial impact assessment applies indicative financial range limits:

LOW financial impact	>	**up to EUR 0.5 million**
AVERAGE financial impact	>	**from EUR 0.5 million EUR to EUR 5 million**
SIGNIFICANT financial impact	>	**more than EUR 5 million**

Transition plan for climate change mitigation

E1-9

The Port Authority is committed to systematically transforming its business model and infrastructure development to ensure they align with the European Union's climate policy guidelines and its long-term goal of achieving a climate-neutral business model by 2050.

The transition plan to mitigate climate change has not been drafted as a separate document. Its objectives, directions, and measures are integrated into the company's key strategic management documents—the corporate strategy, the Strategic Action Plan (SAP), the Green Port concept, and the Green Port implementation action plan.

This integrated planning principle ensures that climate change mitigation goals are consistently incorporated into long-term and short-term planning, investment, and operational decisions. The strategic documents outline technological, infrastructural, and organizational measures aimed at reducing greenhouse gas (GHG) emissions, increasing energy efficiency, and integrating energy transformation into the main port development decisions.

These directions are based on the long-term vision for the Port of Klaipėda – a green, growing, and competitive port. The aim of port development is to implement it in a way that economic growth is aligned with climate change mitigation goals and sustainable energy resource use.

Climate Change Mitigation Directions and Measures

The climate change mitigation directions for the Port of Klaipėda are based on a combination of technological, infrastructural, and organizational solutions aimed at reducing greenhouse gas (GHG) emissions, increasing energy efficiency, and integrating energy transformation into the main port development decisions.

In the long term, the goal is to significantly reduce CO_2 emissions both at the Port Authority level and across the entire Port of Klaipėda, integrating energy transformation into the main port development decisions and aligning economic development with environmental goals. This aims to strengthen the competitiveness of the Port of Klaipėda and contribute to the implementation of the European Union's climate policy goals.

The following main climate change mitigation measures are planned for the implementation of these directions:

- **Onshore Power Supply (OPS)**

  The development of onshore power supply infrastructure is considered one of the main long-term directions for the decarbonization of the Port of Klaipėda. OPS solutions are designed to reduce GHG emissions, noise, and air pollution during berthing and contribute to more efficient energy use in port operations. The development of OPS infrastructure is planned gradually, covering ro-ro / ro-pax, container, and passenger terminals, in line with the EU Alternative Fuels Infrastructure Regulation (AFIR) requirements.

- **Green Energy and Alternative Fuels Solutions**

  The directions for the transition of the Port of Klaipėda include the expansion of green energy production and use, including the development of infrastructure for the production, storage, and supply of green hydrogen within the port area. This direction is viewed as a medium- and long-term solution aimed at reducing fossil fuel use in port operations and related transport sectors.

- **Development of a Green Port Fleet**

  The Port Authority is renewing its fleet, building hybrid, electric, and alternative fuel-powered vessels for waste collection and other functions of the Port Authority's operations. This direction focuses on the reduction of direct (Scope 1) GHG emissions and is considered one of the most material short- and medium-term decarbonization measures.

Quantitative Goals and GHG Emission Reduction

The climate change mitigation directions and measures of the Port Authority, integrated into the company's strategic documents, are evaluated based on established quantitative CO_2 emission reduction targets. These targets reflect the long-term vision of the Port of Klaipėda as a "green and growing port" and are gradually integrated into sustainability reporting practices.

The future vision presented during the project aims to reduce greenhouse gas (GHG) emissions from the Port of Klaipėda by about 50% by 2035, and the GHG emissions from the Port Authority's operations by about 60%. These targets are considered strategic directions for climate change mitigation, reflecting the ambition to significantly reduce greenhouse gas emissions. The targets are oriented towards the medium term (approximately until 2035, i.e., over the next 10 years).

To ensure a consistent transition to long-term emission reduction targets, the report establishes the following interim quantitative targets:

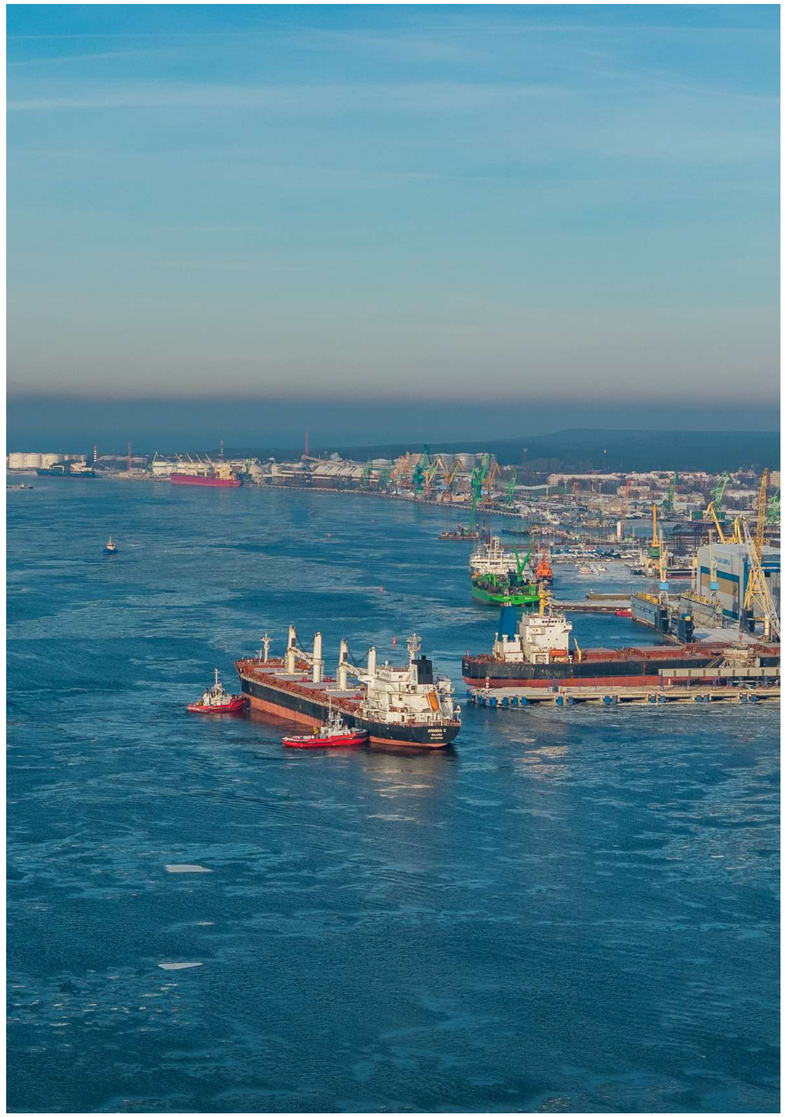
- by 2025, to reduce the CO_2 emissions from the Port Authority's operations by at least 5% compared to the baseline emission level calculated for 2023;
- by 2025, to reduce the CO_2 emissions from the Port of Klaipėda by at least 5% compared to the baseline emission level calculated for 2022.

The results of achieving these targets are presented in the table below.

E1-4

Interim GHG emission reduction targets and their implementation results

- Data for 2025 confirm that both the CO_2 emission reduction targets for the Port Authority's operations and for the entire Port of Klaipėda were not only achieved but also exceeded.
- The target set for the Port Authority's operations was to reduce CO_2 emissions by at least 5% by 2025, compared to 2023. The actual result was a reduction of 6.9%.
- The target set for the Port of Klaipėda is to reduce CO_2 emissions by at least 5% by 2025, compared to 2022. The actual emission reduction was 11.5%. (compared to the 2022 baseline level).
- The monitoring of achieved results is conducted annually, and the targets are periodically reviewed based on actual emission changes.



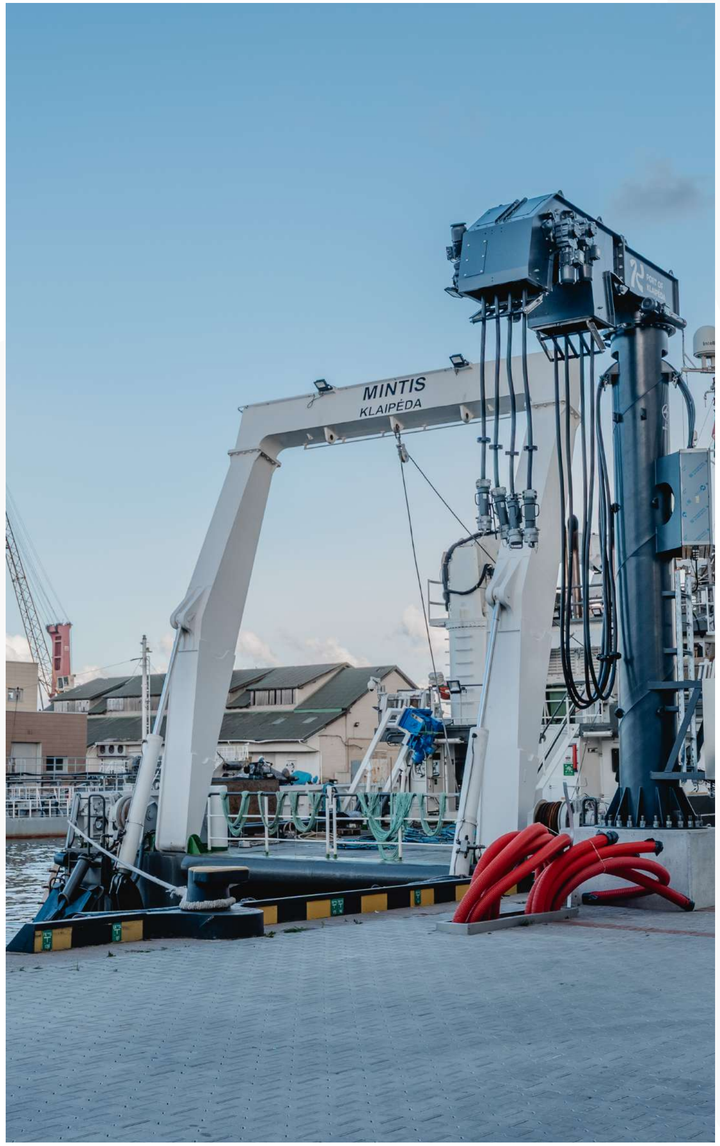
Goal	Baseline period	Target value	Term	Actual result	Evaluation
Reduction of CO_2 emissions from the Port Authority's operations	2023 m.	≥5 % reduction	by 2025 m.	–7,0 %	Target exceeded
Reduction of CO_2 emissions at the Port of Klaipėda	2022 m.	≥5 % reduction	by 2025 m.	–11,5 %	Target exceeded

Decarbonization measures

Decarbonization measure	Main objective	Impact on emissions
Implementation of onshore power supply (OPS) infrastructure	To install onshore power supply infrastructure for container, passenger, and ro-ro / ro-pax vessels, enabling ships to use electricity instead of fossil fuel-powered generators while at berth.	CO_2 emissions during berthing are reduced, as well as noise and air pollution in the port area.
Electrification of port operations and infrastructure	To gradually electrify port infrastructure and operational processes, including port equipment, machinery, and administrative and operational buildings.	Fossil fuel consumption is reduced and energy efficiency is increased.
Development of a Green Port Fleet	To renew the fleet managed by the Port Authority by acquiring electric, alternative fuel (including hydrogen) powered, and hybrid vessels.	Direct (Scope 1) CO_2 emissions related to port fleet operations are reduced.
Development of green hydrogen production and supply solutions	To develop infrastructure for the production, storage, and bunkering of green hydrogen and to create conditions for the use of alternative fuels in port operations and logistics chains.	Opportunities are created to gradually replace fossil fuels with low carbon intensity energy sources.
Integration of renewable energy sources	To promote the use of green electricity and the implementation of local electricity generation solutions. In 2025, a 30 kW solar power plant was installed.	Indirect (Scope 2) GHG emissions are reduced, and energy sustainability is improved.
Increasing energy efficiency	To implement measures to enhance energy efficiency, including modernization of buildings and optimization of technological processes.	Energy demand and emissions related to energy consumption are reduced.
Digital monitoring of GHG emissions and data-driven management	To implement digital solutions for monitoring GHG emissions that allow for the analysis of emissions data and its application in decision-making.	Conditions are created to more accurately assess the impact of decarbonization measures and plan for emissions reduction.
Collaboration with stakeholders	Collaborating with port users, shipping companies, and partners to promote the use of OPS infrastructure and low carbon intensity solutions.	Emissions across the entire port operational value chain are reduced

All listed decarbonization measures are currently being developed and detailed at different stages of maturity, taking into account GHG emissions monitoring data, technological developments, and investment planning decisions.

These measures are integrated into the company's strategy, policy, and green port concept, approved by management and consistently implemented in the company's operations.



Sustainability policy and its implementation

E1-2

In the activities of the Port Authority, environmental protection remains one of the priority strategic directions to ensure sustainable port development, reduce negative environmental impacts, and contribute to the implementation of the Paris Agreement, the European Green Deal goals, and national climate policy objectives. The implementation of this policy is coordinated by the Sustainability and Environmental Protection Division, with the Audit and Risk Committee participating in sustainability reporting processes as prescribed by law. The implementation of the policy is the responsibility of department heads within their respective areas. In turn, supervisory bodies are responsible for overseeing the implementation of the policy. The three lines model applied in the Port Authority helps ensure effective implementation of the sustainability policy, risk management, and accountability.

To increase transparency and accountability, the Port Authority regularly reviews and updates sustainability priorities (at least once a year), conducting double materiality assessments and involving stakeholders or their representatives, as well as publicly disclosing environmental impact assessments, applying European sustainability reporting standards (ESRS).

The Port Authority's Sustainability Policy was approved by the Supervisory Board in April 2025, defining the principles of sustainable operations and establishing the main directions for managing the company's activities related to climate change mitigation and adaptation, impacts, risks, and opportunities. The policy applies to all areas of the Port Authority's activities – from the management and development of port infrastructure to daily operations and collaboration with participants in the port ecosystem.

The environmental policy is integrated into the Port Authority's Sustainability Policy. It is based on the principles of the United Nations Global Compact and the Sustainable Development Goals, and is implemented through an environmental management system tailored to the port sector, known as PERS (Port Environmental Review System). This system has been developed according to the recommendations of the European Sea Ports Organization (ESPO) and takes into account the key requirements of internationally recognized environmental management standards, including ISO 14001, as well as the specifics of port operations.

The environmental policy is implemented through the Port Authority's strategic documents, operational planning, and internal management processes. It is also aligned with other policies applied within the organization, such as the Risk Management Policy, Anti-Corruption Policy, Code of Conduct, and other governance documents, thus ensuring a consistent and comprehensive approach to sustainable port management.

The Sustainability Policy establishes the overall direction for the implementation of the Port Authority's sustainability principles – environmental protection. The goal is to promote green transition by reducing the environmental impact of port operations and contributing to climate change mitigation. Commitments:

- to develop the use of renewable energy sources, such as wind and solar energy, as well as green hydrogen in port infrastructure and operations;
- to promote and implement best management practices and technologies that reduce emissions from vessels and land transport, including onshore power supply for maritime and inland waterway transport infrastructure;
- to protect the Baltic Sea ecosystem by ensuring effective pollution management and waste recycling according to circular economy principles.

Actions and resources related to climate change mitigation and adaptation

E1-3

The Port Authority actively implements climate change mitigation actions to reduce its environmental impact and promote sustainable initiatives.

In 2025, the Port Authority actually carried out investments totaling EUR 76.01 million, part of which was allocated to climate change mitigation and adaptation measures as part of its green transition strategy. Of these:

- 3.45% – EU funds
- 13.07% – the company's own funds
- 83.48% – loan funds.

The Sustainability Report assesses all planned investments aimed at implementing sustainability measures that have a material impact on the environment and society.

In preparing the company's operational strategy plan, part of the sustainability initiatives that serve a dual purpose and contribute to two goals – both infrastructure development and the creation of environmental or social benefits – were allocated to infrastructure development investments. Such classification allows for a clear view of how sustainability aspects are integrated into the main company development projects and the long-term development of the port.

Main measures for mitigating climate change, responsible parties, and investment amounts

Measure	Responsible	Period and scope	CapEx, mEur
1. Modernization of infrastructure to reduce vessel emissions (reduction of emissions at the Port of Klaipėda)			
1.1. Installation of onshore power supply infrastructure at ro-ro/ro-pax terminals (completion rate in % and number of stations)	Head of the Project Management Division	In 2026 – 4 units (100% implementation)	6,24
1.2. Onshore power supply, ongoing activities, units	Head of the Facility Maintenance Division	2025–2035 m. – 1 unit	—
1.3. Prepared eFTI Electronic gates and electronic document exchange solutions (integration into KIPIS), units	Head of the Information Systems Division	2027 m. – 1 unit	Project value – 1.16. Implementation: In 2026 – 0.73 Later – 0.04 annually.
1.4. Improvement of digital solutions created by the port's digital twin by adapting them to the green transition, %	Head of the Information Systems Division	2026 m. – 50 % 2027 m. – 50 %	Project value 0.30. Usage in 2027–2029 at 0.10
2. Promotion of renewable energy use (Reduction of emissions from the Port of Klaipėda and the Port Authority)			
2.1. Feasibility study "Modernization of the KSSA electrical network by installing a local electrical distribution network", units	Strategic project manager	2026 m. – 1 unit	Project value 0.168. Distribution: 2026 – 0.028 2027 – 0.129
2.2. Feasibility study "Simulation-based analytics for forecasting electricity consumption in the KSSA local distribution network", units	Strategic project manager	2027 m. – 1 unit	0,06
2.3. Signed contract for the purchase of green energy services, units	Head of the Facility Maintenance Division	2025–2029 m. – 1 unit	—
2.4. Installation of a solar power plant on the roof of the Fleet base, solar power plant capacity, kW 30	Harbour Master	2026 m. – 1 unit	0,01
3. Fleet renewal (Reduction of emissions from the Port Authority)			
3.1. Installation of hydrogen equipment for a hydrogen and electric-powered vessel, units	Head of the Port Fleet Division	2026 m. – 1 unit	12,09
3.2. Operation of the power supply station for the waste collection vessel, unit.	Head of the Port Fleet Division	2025–2035 m. – 1 unit	—
3.3. Market analysis and service (hydrogen) pricing development, units	Komercijos projektų vadovas	2026 m. – 1 unit	—
3.4. Provision of quality waste collection, management, and recycling services, ongoing activity, units	Uosto priežiūros skyrius	2026–2035 m. – 1 unit	0,05
3.5. Operation of hybrid pilot boats, replacing the old polluting pilot boats "Dangė" and "Mingė" and limiting the use of the boat "Smiltė", units	Head of the Port Fleet Division	2026–2035 m. – 2 unit	—

Measure	Responsible	Period and scope	CapEx, mEur
4. Promotion of hydrogen development (reduction of emissions at the Port of Klaipėda)			
4.1. Completion of green fuel (hydrogen) production equipment installation, %	Strategic project manager	2026 – 100 % implementation	7,70
4.2. Completion of green fuel (hydrogen) public refueling stations installation, %	Strategic project manager	2026 – 100 %	2,99
4.3. Supply of green fuel, ongoing activities, units	Head of the Commercial Group	2026–2035 – 1 unit	—
5. Renewal of the service vehicle fleet (reducing emissions from the Port Authority)			
2.1. Purchased electric vehicles, units	Head of the Facility Maintenance Division	2026 – 2 units	—
2.2. Installed electric vehicle charging stations, units	Head of the Facility Maintenance Division	2026 – 1 unit 2027 – 2 units	Total – 0.13. 2026 – 0.050 2027 – 0.080
2.3. Purchased hybrid (electric-petrol) vehicle, units	Head of the Facility Maintenance Division	2026 – 1 unit	—
6. Calculation of GHG emissions from shipping and transport at the Port of Klaipėda and data disclosure (reduction of emissions at the Port of Klaipėda)			
3.1. Calculation of GHG emissions at the Port of Klaipėda has been completed and data is being disclosed to the public.	Sustainability and Environmental Protection Division	From 2025, annually	—
3.2. Updating the strategic measures and action plan based on the received GHG data.	Sustainability and Environmental Protection Division	From 2025, annually	—
3.3. Installation of air quality measurement stations, units	Sustainability and Environmental Protection Division	2026 – 3 units	2026 – 0,20
3.4. Submission of sustainability information reports to the Communication and Marketing Division (for public disclosure), with data revealed to the public on the website: https://portofKlaipėda.lt/uosto-direkcija units/year	Communications and Marketing Department	2026–2035 – 1 unit	—
7. Initiatives promoting and implementing green transformation in the port			
7.1. Extension of the PERS (Port Environmental Management System) certificate	Sustainability and Environmental Protection Division	Starting in 2026, every two years	—
7.2. Climate change adaptation or mitigation strategy, action plan, investment plan	Sustainability and Environmental Protection Division	2026 – 1 unit	—
7.3. Formation of green corridors in KSSA (participation in the “BalticSea-GSC” programme)	Sustainability and Environmental Protection Division	2026 – 1 unit	—

To promote the use of alternative fuels in shipping and the development of green shipping corridors, a memorandum of cooperation was signed in 2024 with six European ports and X-Press Feeders, a Singapore-based container shipping company.

Funding has been allocated under the Swedish Institute's Baltic Sea Neighborhood Programme (Seed Project) for a joint project between the Port of Klaipėda and partners from Sweden and Estonia aimed at assessing the potential for developing green shipping corridors in the Baltic Sea. The project implementation period is scheduled from October 1, 2025, to September 30, 2026.

During the project, it is planned to assess the readiness of ports to accommodate environmentally friendly vessels, analyze the needs of ports and the shipping sector, and develop partnerships across the maritime value creation chain, involving ports, shipping companies, and energy suppliers. Based on the analysis conducted, a concept for potential green shipping corridors in the Baltic Sea will be developed, defining possible routes, infrastructure needs, and potential implementation scenarios.

The results of this project will form the basis for further regional cooperation projects and possible funding solutions aimed at implementing green shipping corridors in the Baltic Sea region.

In addition to climate change mitigation measures related to reducing GHG emissions and energy transformation, the Port Authority is also implementing measures aimed at adapting to the impacts of climate change and increasing the resilience of port infrastructure and operations to extreme climate events.

This section presents the main measures aimed at reducing the physical risks posed by climate change and ensuring the long-term stability of port infrastructure and operational activities.

Climate change adaptation measures

In addition to climate change mitigation measures, the Port Authority is also implementing measures aimed at adapting to the impacts of climate change and increasing the resilience of port infrastructure. These measures include increasing energy efficiency, reducing air pollution, and infrastructure adaptation projects. In collaboration with companies operating in the port area, the system for collecting, discharging, and transferring surface runoff water to the wastewater treatment operator has been improved, and other measures for protecting the port ecosystem and enhancing infrastructure resilience are being implemented.

1. **Integrating climate change forecasts into infrastructure planning**

   When planning and updating port infrastructure, future climate conditions, such as increasing precipitation, rising water levels, and strengthening winds, are taken into account. Climate change assessments will also be integrated into the upcoming Business Continuity Management System, which will meet the requirements of the ISO 22301:2019 standard.

2. **Assessment and strengthening of port infrastructure resilience**

   Analyses of the existing infrastructure's vulnerability to climate change are conducted, and measures are planned to increase resilience to flooding, storms, and other extreme weather events.

3. **Monitoring of hydrometeorological parameters**

   Water level monitoring is conducted in the water area, and hydrometeorological sensors are installed in the port area to measure wind speed, direction, gusts, temperature, and visibility. As of March 23, 2025, wave measurements began in the outer water area using the automatic wave measuring buoy OBS-Buoy400. The collected data is transmitted in real-time to the Port Authority's data portal PortGIS.

4. **Protection of coastal areas and ecosystems**

   The Port Authority implements contaminated soil management solutions that ensure the reduction of environmental pollution and the safe use of soil in the port area. Contaminated soil is excavated, transported to a specially equipped technological soil treatment site, and stabilized using the self-compacting modified soil technology (SCMS). The treated soil is used to create new land areas for the expansion of port infrastructure.

   Less contaminated soil can also be used for beach replenishment, thus contributing to the reduction of coastal erosion. The applied solutions significantly reduce the risk of environmental pollution.

5. **Review and update of the emergency management plan**

   The port's emergency management plan is periodically reviewed and supplemented with climate-related hazard management measures. The aim of these actions is to ensure a more effective response to extreme weather events, such as severe storms, floods, or other incidents caused by climate change.

6. **Reduction of erosion effects**

   In order to mitigate the impact of climate change on the coasts and the Curonian Lagoon ecosystem, measures for coastal stabilization and erosion prevention are planned and implemented. They include various infrastructural solutions, such as the installation of underwater walls, strengthening the southern port gates, and other coastal protection measures.

7. **Analysis of climate change risks**

   A comprehensive analysis of climate change risks for the Port of Klaipėda is being conducted, with results expected to be presented in the second half of 2026. Based on this analysis, the strategic directions for port sustainability, action plans, and climate change adaptation measures will be updated to enhance infrastructure resilience and ensure operational continuity.

Energy consumption

E1-5

	2025	2024	2023	Change 2024-2025	Change 2023-2024
Electricity consumption, MWh					
Administration, J. Janonio g. 24-1	506,4	493,1	473,7	2,7 %	6,9 %
Other functions (infrastructure, street lighting, communication antennas, pumping stations)	561,6	488,1	487,5	15,0 %	15,2 %
Total electricity consumption	**1068**	**981,2**	**961,2**	**8,89%**	**11,1 %**
Heat energy consumption, MWh					
Administration, heating, J. Janonio g. 24-1	689,1	726,3	663,6	-5,1 %	3,8 %

Analysis of total electricity consumption: In 2023, it was 961.2 MWh, in 2024 – 981.2 MWh, and in 2025 it increased to 1068 MWh. This is 8.85 percent more than in 2024 and 11.1 percent more than in 2023. The increase in electricity consumption is related to the energy transition, the renewal of the vehicle fleet, and the consistent acquisition of electric and hybrid vehicles.

At the electric vehicle charging stations installed at the administrative building, and with the growing number of electric and hybrid vehicles, the amount of electricity consumed for their charging has proportionally increased, as electricity is drawn from the internal electrical network of the administrative building: from 473.7 MWh in 2023 it increased to 493.1 MWh in 2024 and to 506.4 MWh in 2025. The annual growth was 2.7 percent. The electricity consumption for other functions (infrastructure, street lighting, communication antennas, and pumping stations) remained essentially stable in 2023–2024 (487.5 MWh and 488.1 MWh) due to implemented improvements (such as motion sensors with photo relays, etc.), but in 2025 it increased to 561.6 MWh, which is 15.05 percent more than in 2024 due to the newly constructed fleet base building intended for storage and the increased volume of other functional services (the ability to berth the powerful KU research vessel “Mintis”, whose electricity demand significantly impacts electricity consumption).

The energy consumption intensity indicator is not presented separately, as the company does not belong to sectors that have a material impact on climate change.

Heat energy consumption for heating administrative premises fluctuated during the comparative period. In 2023, the consumption of thermal energy amounted to 663.6 MWh, increased to 726.3 MWh in 2024, and decreased to 689.1 MWh in 2025, which is 5.1% less than in 2024. According to the data from the Lithuanian Hydrometeorological Service (LHMT), the average annual air temperature in 2025 was 8.4 °C, while in 2024 it was 9.5 °C. This means that 2025 was a colder year (the average temperature was 1.1 °C lower), however, despite this, the consumption of thermal energy decreased.

In order to reduce the impact on the environment and greenhouse gas emissions, starting from July 2025, the Port Authority began using electricity generated from renewable energy sources (see “Main measures, responsible persons, and investment amounts”).

Until July 2025, all electricity was purchased from “UAB Ignitis” and generated from non-renewable energy sources. The Port Authority is additionally implementing energy efficiency initiatives to reduce energy consumption:

- **Street lighting:** light sensors are used for street lighting in the port area, which automatically turn on the lighting at dusk and turn it off at dawn, thus optimizing the operating time of the lighting. This method of lighting control, compared to manual control or simple timers, can help reduce electricity costs by up to 20%. In the street lighting poles, old sodium and metal halide lamps are gradually being replaced with modern LED floodlights.
- **Fleet base infrastructure:** the fleet base was built in 2025 and started operating from April. Throughout the facility, both indoors and in the outdoor area, LED lighting has been installed. The indoor lighting is adjusted to turn on in response to motion, while the outdoor lighting is controlled by light sensors with a photo relay system. This automated lighting control allows for an approximate 15% reduction in electricity consumption.

Greenhouse gas emissions

E1-6

Since 2024, the Port Authority has been calculating Scope 1 and Scope 2 greenhouse gas (GHG) emissions as part of its annual GHG accounting, in accordance with the Greenhouse Gas Protocol methodology.

Starting in 2025, the Port Authority's accounting records also include emissions generated by port transportation, vessel, and cargo turnover operations, which are assigned to Scope 3 GHG emissions and are calculated in accordance with the EMEP/EEA air pollutant emission inventory guidebook (2023). For the collection, monitoring, and analysis of these emissions data, the GISGRO emission calculation platform is used, allowing for consistent accumulation and visualization of emission data in real time.

Shipping emissions are calculated using Tier 3 accuracy level, utilizing AIS (Automatic Identification System – navigational information sent by vessels used to ensure safe shipping traffic) data, while port transport emissions are calculated using Tier 2 accuracy level according to the EMEP/EEA methodology.

The Tier methodology defines the accuracy level of emission calculations:

- Tier 1 – overall emissions assessment using standard emission factors and aggregated activity data;
- Tier 2 – more detailed calculation using sector or country-specific emission factors and more precise activity data;
- Tier 3 – the highest accuracy level, where emissions are calculated based on detailed activity data, actual operating parameters, or modeling (e.g., AIS data-based vessel movement modeling).

By 2024, the Port Authority's GHG accounting covered only Tier 1 and Tier 2 emissions, but in 2025, with the integration of historical Tier 3 data into the GISGRO platform, three years of emissions data were made available for comparative analysis.

In 2025, the Port Authority's Scope 1 GHG emissions amounted to 542.9 t CO_2 equivalent (about 58.4%), while Scope 2 emissions were 386.9 t CO_2 equivalent (about 41.6%). The total indicator for Scope 1 and Scope 2 is 929.8 t CO_2 equivalent. Compared to 2024 (1,209.6 t CO_2 equivalent), total emissions decreased by 23.1 percent, and compared to 2023 (998.7 metric t CO_2 equivalent), they decreased by 6.9 percent.

A significant portion of the overall emissions balance of the Port of Klaipėda consists of Scope 3 GHG emissions related to shipping, cargo turnover equipment, and transport activities. In 2025, they amounted to 78,406.9 t CO_2 equivalent, which is 1.6% less than in 2024 (79,672.0 t CO_2 equivalent).

	Retrospective data						Objectives	
	2025	2024	2023	Change, % (2024–2025)	Change, % (2023–2025)	Explanation of the change	2025	2035
Scope 1 GHG emissions								
Total Scope 1 GHG emissions, t CO_2 equivalent	542,9	515,3	494,8	5,4	8,9	Diesel fuel consumption increased due to more intensive operation of the "Mingė" boat, and emission factors changed/increased		
Scope 2 GHG emissions								
Scope 2 GHG emissions, t CO_2 equivalent (market-based method)	386,9	694,3	504,0	–44,3	–30,3	The material impact on the decrease was due to electricity purchased from renewable energy sources, which has a conversion factor of zero. Additionally, higher air temperatures led to lower thermal energy costs in 2025.		
Scope 2 GHG emissions, t CO_2 equivalent (location-based method)	121,4	233,8	289,5	–48,1	–58,1			
Level 2 GHG emissions, % of total (market-based method)	41,6	57,4	50,5	–27,5	–21,3			
Total GHG emissions from Scope 1 and 2								
Total GHG emissions, t CO_2 equivalent	929,8	1 209,6	998,7	–23,1	–6,9		–50 %	–60 %
Significant Scope 3 GHG emissions								
Total indirect (Scope 3) GHG emissions, t CO_2 equivalent	78 406,9	79 672 ,0	83 405,0	–1,6	–6,0		–15 %	–50 %

Direct GHG emissions (Scope 1)

Direct GHG emissions (Scope 1) are generated by land-based vehicles (cars, specialized equipment) and watercraft owned or operated by the Port Authority that run on gasoline, diesel, or natural gas. Furthermore, this Scope also includes emissions from refrigerant gas leaks from cooling systems installed in buildings owned or operated by the company and in vehicles. These emissions have a direct impact on climate change.

In 2025, the Port Authority's direct (Scope 1) GHG emissions increased by 5.4% compared to 2024, and by 9.7% compared to 2023, indicating a consistent increase in Scope 1 emissions over the past two years.

The increase in emissions was driven by the increased consumption of diesel fuel in the shipping equipment used in port operations, particularly in the operation of the pilot boat "Mingė". It was also influenced by the updated and increased CO_2 emission factors for diesel fuel in 2025 (according to Greenhouse Gas Reporting: Conversion Factors 2025, GOV.UK), which are used to calculate emissions generated during fuel combustion. These factors contributed to the overall increase in Scope 1 GHG emissions.

Indirect GHG emissions from energy consumption (Scope 2)

Indirect greenhouse gas emissions (Scope 2) include emissions arising from electricity and heat energy purchased from external suppliers, used for administrative premises, port infrastructure, street lighting, and other operational needs of the company.

In accordance with the requirements of ESRS E1-6 and the Port Authority's GHG accounting methodology, Scope 2 emissions are disclosed in the report using both accounting methods – the market-based method and the location-based method.

In 2025, the Port Authority's Scope 2 GHG emissions calculated using the market-based method amounted to 386.9 t CO_2 equivalent, which is 44.3% less than in 2024. (694.3 t CO_2 equivalent). Compared to 2023 (504.0 t CO_2 equivalent), emissions decreased by 23.2 percent.

Using the location-based method, in 2025, Scope 2 GHG emissions amounted to 121.4 t CO_2 equivalent, which is 48.1 percent less than in 2024 (233.8 t CO_2 equivalent) and 58.1 percent less than in 2023 (289.5 t CO_2 equivalent).

The significant reduction in Scope 2 GHG emissions was due to the use of electricity from renewable energy sources, which has a zero emission factor according to the market-based method, as well as lower consumption of centralized heating energy due to higher average air temperatures in 2025.

Note on the accuracy of Scope 1 and Scope 2 emission factors

The GHG emission factors for Scope 1 and Scope 2 presented in the report are not absolutely accurate or unambiguous, as their calculation involves unavoidable uncertainties. Although reliable source factors are used in the internal company methodology (STR 2.01.02:2016, DEFRA, Carbon Footprint Ltd.), they are calculated based on averages and scientific models, rather than always measured in specific situations. Choosing a different emission factor (e.g., from another database) or applying a different calculation method could result in significantly different emission figures.

Indirect GHG emissions (Scope 3)

In order to improve the accuracy of GHG accounting and strengthen emissions management, the Port Authority has begun implementing advanced emissions monitoring and analysis systems throughout the port area starting in 2024. This process is ongoing and focused on the long-term goal of enabling real-time monitoring of emissions generated by entities and vehicles operating in the port area, analyzing their changes, and managing climate-related risks more effectively.

To achieve these goals, the port emissions management platform developed by the Finnish company "Gisgro Ltd" is used, which ensures data collection, modeling, and analytical assessment. In 2025, the Port Authority conducted level 3 GHG emissions calculations for the first time, including data on emissions from mobile pollution sources and cargo turnover equipment of companies operating in the port area, as well as shipping activity data collected in real time. These data are included in the assessment after the reporting years have ended.

The system calculates and visually presents the emissions of pollutants and greenhouse gases from vessels operating in the Port of Klaipėda and port transport, including cargo turnover equipment. The assessed air pollutant emissions include carbon monoxide (CO), nitrogen oxides (NO), sulfur dioxide (SO_2), particulate matter (PM), non-methane volatile organic compounds (NMVOCs), and other substances specified in the calculation methodologies, as well as greenhouse gases (GHG).

According to the calculations, total indirect (Scope 3) GHG emissions in 2025 amounted to 78,406.9 t CO_2 equivalent, compared to 79,672.0 t CO_2 equivalent in 2024. This indicates that in 2025, compared to 2024, Scope 3 GHG emissions decreased by 1.6 percent. In 2023, Scope 3 GHG emissions amounted to 83,405.0 t CO_2 equivalent, which is a decrease of 6.0 percent from 2023.

Where do GHG emissions come from?

Shipping and loading activities

98,8%

Volume 3

78 406,9 t CO_2 ekv.

EMEP/EEA method

Shipping
Ships in the port area

Cargo equipment
Cranes and machinery

Port transport
Transport vehicles in the port

Port Authority activities

<1,2%

Volumes 1+2

929,8 t CO_2 ekv.

GHG Protocol method

Vehicles
Land and Water

Refrigerants and Energy
Leakage and Purchased Energy

GHG intensity

The intensity of greenhouse gas (GHG) emissions indicates how much GHG emissions correspond to one unit of economic activity of the Port Authority, and allows for the assessment of emission changes in relation to the scale of operations. Since Scope 1–2 and Scope 3 GHG emissions are calculated using different methodologies and different data scopes, the GHG intensity indicator is calculated based on the total Scope 1 and Scope 2 GHG emissions to ensure the consistency and comparability of the indicator across reporting periods.

In 2025, the Port Authority's net revenue amounted to EUR 63.31 million, which was 4.96 percent more than in 2024 (EUR 60.32 million) and 8.09 percent more than in 2023 (EUR 58.57 million).

GHG intensity in 2025 was 14.69 t CO_2 equivalent/million euros, compared to 20.05 t CO_2 equivalent/million euros in 2024 and 17.05 t CO_2 equivalent/million euros in 2023. Compared to 2024, GHG intensity decreased by 26.76 percent, and compared to 2023, it decreased by 13.87 percent.

The decrease in GHG intensity was driven by an overall reduction in GHG emissions from Scope 1 and Scope 2, combined with an increase in the Port Authority's revenue. This metric continues to be used as a key indicator for monitoring emissions management and operational efficiency, and for assessing progress toward long-term climate change mitigation goals.

Indicator	Unit of measurement	2025	2024	2023	Change (2024–2025)	Change (2023–2025)
Net revenue	mEur	63,31	60,32	58,57	4,96 %	8,09 %
GHG intensity	**t CO_2 equivalent/ mEur**	14,69	20,05	17,05	–26,76	–13,87

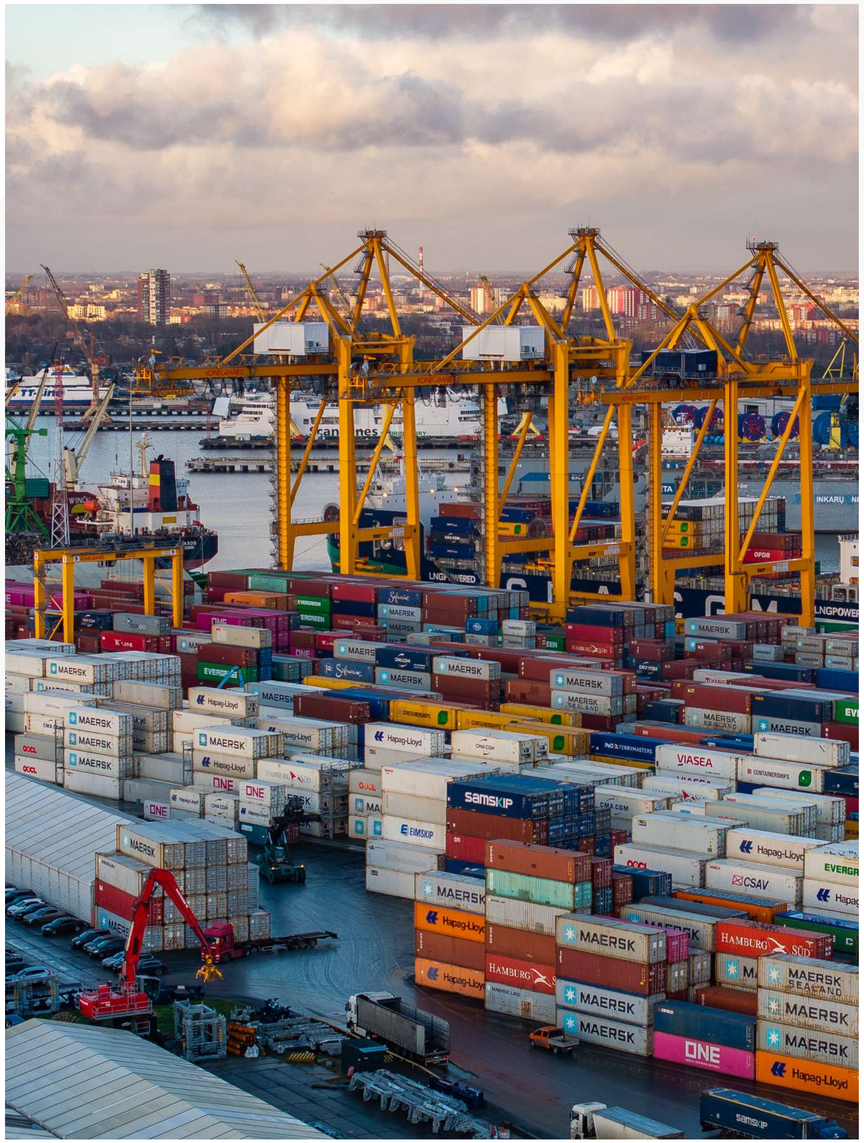
NB: GHG intensity was calculated based on Scope 1 and Scope 2 GHG emissions

E1-7

During the reporting period, the Port Authority did not engage in carbon dioxide absorption or storage activities and did not finance GHG reduction projects through carbon credits.

E1-8

The Port Authority does not use a carbon pricing system.



Pollution

The activities of the Klaipėda State Seaport Authority cover various aspects of environmental pollution management related to cargo turnover, shipping, energy, and transportation infrastructure operations carried out within the port area. Given that the port operates in an environmentally sensitive area - the coast of the Curonian Lagoon and the Klaipėda Strait - the prevention, control, and reduction of pollution are an important part of the company's environmental management system.

In accordance with national, European Union, and international environmental protection requirements, the company consistently implements measures aimed at preventing pollution, monitoring it, and minimizing any potential negative impact on the environment.

This section provides information on the main pollution-related aspects of the company's operations: air, water, and soil pollution, as well as their interrelationships in environmentally sensitive areas. This information has been prepared in accordance with the requirements of the European Sustainability Reporting Standard (ESRS) E2, "Pollution".

Disclosure Requirements List

IRO-2

ETAS 2	General Disclosures	Reference
IRO-1	Description of the processes to identify and assess significant climate-related impacts, risks, and opportunities	49
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	50, 56
E2-1	Policies related to pollution	52
E2-2	Actions and resources related to pollution	52
E2-3	Tasks related to pollution	53
E2-4	Air pollution	54
E2-5	Substances of concern and substances of very high concern	55
E2-6	Estimated financial impact of material risks and opportunities related to pollution	55

Description of the processes to identify and assess significant pollution-related impacts, risks, and opportunities

IRO-1

Based on a double materiality assessment, pollution is a material topic for the Company in terms of both environmental impact and financial risks. Various activities related to shipping, loading, transport, and infrastructure operations – sources of pollution – are carried out in the port area. The main impact aspects include air pollution from emissions in the shipping sector, surface water pollution due to wastewater or potential pollution incidents, and historically accumulated soil pollution in the water area.

These impacts are interrelated – pollutants in the air can settle on the water surface, water pollutants can accumulate in seabed sediments, and soil pollutants can be reintroduced into the water flow during dredging works or storms. Therefore, managing pollution impacts in the port area requires a systematic and integrated approach.

The methodology and principles for assessing pollution impacts, risks, and opportunities are detailed in the methodological section of the Sustainability Report on double materiality assessment. The topic of pollution is significant for the Company under three sub-topics: air pollution, water pollution, and soil pollution. Each of these was assessed separately based on impact materiality and financial materiality criteria, considering the specific activities of the Port Authority and the geographical context.

The following key sources were used to identify impacts, risks, and opportunities: The concept of a green port for the Klaipėda State Seaport, the PERS report, the environmental monitoring report of the Klaipėda State Seaport (2025), and environmental impact assessment reports. Additionally, the assessment was supplemented by insights from stakeholder surveys conducted during the double materiality assessment, confirming that air quality is one of the main concerns of local communities, while the management of water and soil pollution incidents is a sensitive reputational area for both clients and regulatory authorities.

SBM-3

Air pollution

Air pollution is one of the most significant environmental issues related to the activities of the Port of Klaipėda, directly linked to the port's business model, which is based on intensive shipping, loading, and transport activities. Significant negative impacts occur throughout the value chain – from shipping to cargo turnover and land transport.

The highest amounts of air pollutants are generated by vessels using fossil fuels, as well as cargo turnover operations and transport. SO_2, NO_2, particulate matter (PM), BC, and other pollutants are emitted into the environment. Considering the technological limitations of the fleet, part of this impact will remain in the medium and long term.

The risks associated with air pollution include regulatory pressure, impacts on public health, and reputation. This topic also presents opportunities to modernize operations. The port strategy includes investments in onshore power supply (OPS) infrastructure, emissions monitoring, and less polluting solutions. These measures allow for reducing impact, ensuring compliance with requirements, and strengthening the port's competitiveness.

Water pollution

Water pollution is a significant issue due to the ongoing impact of port operations on the ecosystems of the Curonian Lagoon and the Baltic Sea. The impact is related to the discharge of wastewater, pollution incidents, and cargo turnover activities in the port area, as well as the operations of companies in the value chain.

Although localized pollution constitutes a relatively small part of the overall contamination, the impact is assessed as material due to its persistence and high likelihood that pollution will remain in the medium and long term (based on the concept of a green port for the Klaipėda State Seaport). Pollution incidents are periodically recorded in the port, most of which are related to oil product spills. Although the concentrations of petroleum hydrocarbons in the water generally do not exceed threshold values (according to the environmental monitoring report of the Klaipėda State Seaport), the frequency of incidents indicates a continuous risk.

The main risks include environmental incidents, associated financial costs, and reputational impact. These aspects influence operational management and require continuous strengthening of preventive and control measures.

Soil pollution

Soil pollution is significant due to the accumulation of pollutants in the water area and their potential dispersion during dredging and infrastructure works. Although the dredging contractor is not the Company, pollutants accumulated in the seabed sediments may be disturbed during these works, and their dispersion depends on the technologies used, soil properties, and the work location.

Monitoring data shows that the water area's soil does not meet good condition indicators in all areas – concentrations of tributyltin, heavy metals, and other pollutants are recorded, and in some areas, the contamination level remains elevated for a long time. In most monitoring stations, a decrease in pollutant concentrations was observed in 2025 compared to the 2021–2024 period. According to the environmental monitoring report of the Klaipėda State Seaport, soil pollution is related to historical contamination, and its prevalence in some areas remains long-term. However, environmental monitoring data indicate a multi-year trend of improvement in condition, thus changes in soil pollution are assessed in the medium and long term considering the implemented pollution reduction measures.

The main risks are associated with the spread of pollution, additional costs of soil management, and the complexity of implementing infrastructure projects. These aspects influence investment planning and operational management, therefore the port strategy plans to apply advanced solutions for dredging, soil management, and pollution prevention.

The table describes the significant IRO of the Company related to air, water, and soil pollution.

E2-6

The Port Authority, taking advantage of the opportunity to gradually disclose information, does not indicate the financial impact.

Sub-topic	Material impacts	Description	Location in the value chain
Air pollution	Actual negative impact	Air pollution caused by incoming, stationary, and outgoing vessels (SO2, CO, HC, NOX, particulate matter (PM2.5, PM10), BC, NMVOC), port economic activities (e.g., loading operations), road transport, and the development of new port areas.	Initial and final value chain
	Potential positive impact	Onshore power supply to vessels in the port, which will contribute to the reduction of air pollution in the sector.	Downstream chain
	Actual negative impact	Air pollution (SO2, CO, HC, NOX, particulate matter, PM2.5, BC, NMVOC) emitted by vehicles and vessels used in various operations.	Direct activity
	Potential positive impact	The implementation of air quality monitoring systems, emission calculations, and informing port companies allows for a prompt response to pollution and contributes to better air pollution management.	Direct activity and final chain
Water pollution	Actual negative impact	Water pollution related to vessel operations and activities conducted in the port area (e.g., oil product or other pollutant spills from vessels, residues from loading operations, open storage of bulk products (e.g., fertilizers, grains, etc.), discharge of contaminated wastewater), which can lead to pollutants entering the Curonian Lagoon and the Baltic Sea.	Downstream chain
Soil pollution	Actual negative impact	Soil pollution related to the lifting of pollutants accumulated in the seabed sediments of the water area during dredging and cleaning works, which can cause pollutants to spread in the water environment.	Direct activity
	Actual negative impact	Soil pollution related to economic activities conducted in the port area and operations of port companies, which can lead to pollutants entering the soil and seabed sediments.	Downstream chain
Water and soil pollution	Risk	Insufficient management of pollution incidents and lack of preventive measures can lead to recurring pollution incidents and negative impacts on the port's reputation.	Direct activity
	Risk	Non-compliance with environmental requirements related to water and soil protection and hygiene standards in contracting or land leasing activities can result in reputational and financial consequences for the company.	Direct activity

Policies related to pollution

E2-1

The environmental policy of the Port Authority, part of the sustainability policy outlined in disclosure E1-2, also includes principles of pollution prevention and control. For more information on the sustainability policy and the applicable commitments, refer to the section “Sustainability Policy and Its Implementation”.

Tasks, actions, and resources related to air pollution

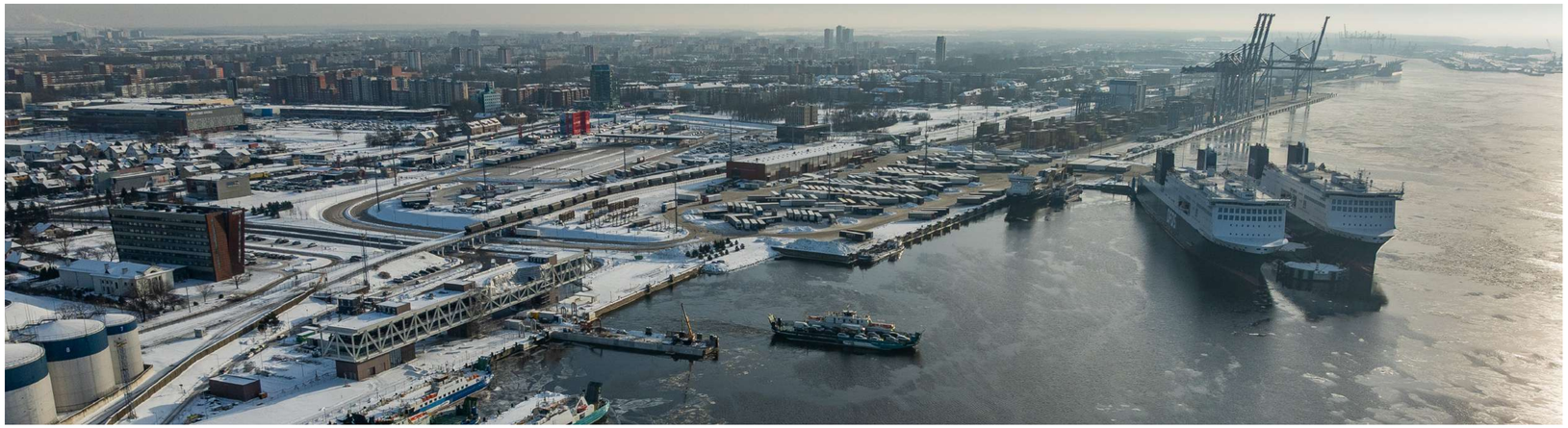
E2- 2

The company implements measures aimed at the prevention, reduction, and control of air, water, and soil pollution. The actions are focused on the most material impacts identified during the double materiality assessment and include both direct activities and oversight of the operations of companies in the value chain.

Environmental management is based on systematic environmental monitoring, during which the condition of water, seabed sediments, biological components, and other environmental elements is assessed, major sources of pollution are identified, and mitigation measures are planned. The monitoring results are used to assess the extent of pollution, determine priority areas for action, and plan pollution reduction measures.

The table below lists actions and resources related to pollution. Information about financial resources allocated for pollution prevention and reduction is provided in detail in the taxonomy report section, which reveals investments aligned with environmental goals.

Pollution area	Key actions	Allocated resources
Air pollution	— Installation and development of onshore power supply (OPS) infrastructure — Acquisition and installation of certified air quality measurement stations, ensuring compliance with established environmental monitoring quality standards — Promotion of less polluting technologies and solutions in the port area — Collaboration with port users regarding emission reduction	— Investments in OPS infrastructure — Air quality monitoring systems — Competence of environmental specialists — Data management and analysis systems
Water pollution	— Strengthening of pollution incident prevention and response measures — Control of surface runoff water and pollution sources — Supervision of cargo turnover operations, reducing pollution dispersion — Regular monitoring of water quality — Compliance control with environmental requirements in the value chain	— Investments in pollution prevention infrastructure — Resources allocated for monitoring — Incident management systems — Environmental control processes
Soil pollution	— Application of advanced dredging technologies — Implementation of contaminated soil management solutions — Monitoring of soil conditions — Integration of pollution prevention measures into infrastructure projects	— Investments in technological solutions — Project management and environmental expertise — Monitoring and data analysis



Tasks related to pollution

E2-3

The company identifies pollution-related tasks focused on reducing air, water, and soil pollution, improving environmental conditions, and ensuring compliance with environmental requirements. Tasks are defined based on the most material impacts identified during the double materiality assessment, as well as strategic documents, environmental monitoring results, and environmental management practices.

Air pollution

Key tasks:

- to reduce emissions of air pollutants (NO , SO_2, particulate matter, etc.) in the port area;
- to improve air quality and reduce negative impacts on public health;
- to promote the use of less polluting technologies and alternative energy solutions;
- to develop the onshore power supply (OPS) infrastructure;
- to strengthen air quality monitoring and data-driven decision-making.

Quantitative targets:

- by 2025, to reduce the Port Authority's operational CO_2 emissions by at least 5% compared to the 2023 baseline level;
- by 2025, to reduce the CO_2 emissions of the Port of Klaipėda by at least 5% compared to the 2022 baseline level.

Water pollution

Key tasks:

- to reduce the impact of water pollution on the Curonian Lagoon and the Baltic Sea;
- to reduce the likelihood of pollution incidents and their impact on the environment;
- to ensure the control of surface runoff water and pollution sources within the port area;
- to improve compliance with environmental requirements in the value chain;
- to strengthen water quality monitoring and early response mechanisms to pollution.

Quantitative targets:

- to ensure that water quality indicators do not exceed the limits set by legislation.

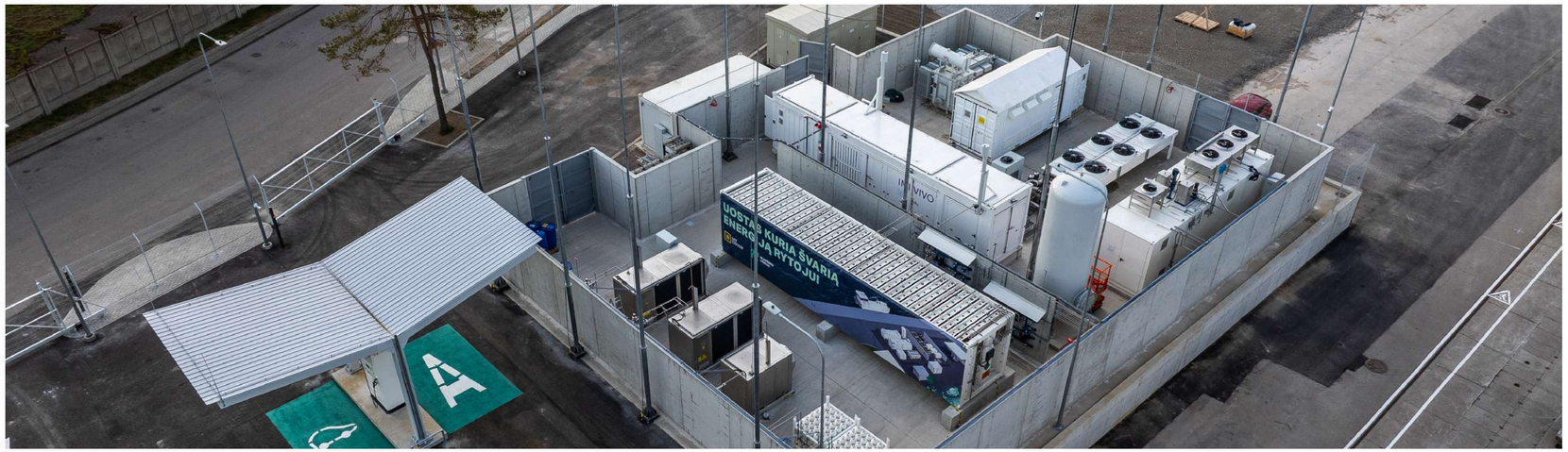
Grunto tarša

Key tasks:

- to reduce the level of soil contamination in the water area;
- to reduce the risk of pollution dispersion during dredging and infrastructure works;
- to ensure the safe management of contaminated soil;
- to integrate pollution prevention solutions into infrastructure development;
- to strengthen soil condition monitoring and long-term impact assessment.

Quantitative targets:

- to ensure that soil contamination indicators do not exceed established limits and are reduced in the long term.



Air, water, and soil pollution

E2-4

The Port Authority assesses air, water, and soil pollution based on the PERS (Port Environmental Review System) report, the environmental monitoring programme, and the KPI indicator system. Pollution assessment includes the main sources of activity: shipping, cargo turnover operations, port equipment use, and related processes.

The main aspects of pollution have been identified as significant from an environmental perspective, particularly due to their impact on air quality, water ecosystems, and soil condition.

Air pollution

The table presents the quantities of key air pollutants calculated based on the GISGRO emissions accounting system and the PERS methodology. The data covers the period from 2022 to 2025 and is expressed in absolute emissions in tons per year (t/year).

The accounting includes the main emission sources related to port activities, including vessel movements, the use of port operational equipment, and land transport. The table includes the most significant air pollutants – nitrogen oxides (NO), particulate matter (PM10 and PM2.5), and greenhouse gases (CO_2), which have the greatest impact on air quality and climate change.

The data shows that during the analyzed period, emissions of most air pollutants decreased. The decreasing trends are associated with operational efficiency improvements, the implementation of technological solutions, and the transition to less polluting energy sources.

Emission calculations are performed in accordance with international standards, including the EMEP/EEA methodology, ensuring data reliability and comparability.

Pollutant	Unit of measurement	2023	2024	2025
Air pollution				
CO_2 (Scope 1)	t/year	494,8	515,3	542,9
CO_2 (Scope 2)		504,0	694,3	386,9
NO_2		1232,25	1157,55	1157,55
PM10		42,71	39,98	37,92
PM2,5		42,66	39,93	37,87
SO_2		37,81	35,59	34,24

Soil pollution

Activities conducted in the port area affect the soil and groundwater, particularly in areas where cargo storage, industrial activities, and infrastructure development take place.

Soil pollution is associated with historically accumulated sediments, the management of contaminated soil, and related infrastructure, including contaminated soil sites. Continuous environmental monitoring is conducted in these areas, allowing for the assessment of potential pollution dispersion into the environment.

Soil pollution can manifest not only in the soil but also through the entry of pollutants into surface and groundwater, thus the condition of these environmental components is closely related.

One of the main methods for assessing soil pollution is the analysis of wastewater discharged from contaminated soil sites, which allows for the evaluation of potential pollutant entry into the water environment. Based on environmental monitoring data, annual pollutant quantities have been determined. The data was collected through environmental monitoring in accordance with the requirements of applicable legislation.

Pollutant	Unit of measurement	Annual quantity
Arsenic	t/year	0,00003816
BDS7		0,034
General nitrogen		0,0348
General phosphorus		0,0022
ChDS		0,383
Chromium		0,00002071
Nickel		0,00000284
Suspended substances		0,1475
Tributyltin		0,00000003
Copper		0,00002312

It was additionally determined that some pollutants (e.g., zinc, lead, cadmium, petroleum products) were not detected or were below the detection limit.

The highest concentrations detected were for the following pollutants:

- chemical oxygen demand (COD),
- suspended substances,
- nitrogen compounds.

These data indicate that the main pollution is associated with organic materials and suspended particles that may form when managing contaminated soil.

Although the company is not a direct source of pollution, monitoring of the contaminated soil site allows for the assessment of potential pollution dispersion and ensures that the activities carried out do not have a significant negative impact on the environment.

E2-5

The company's activities are not directly related to the use or production of substances of very high concern (SVHC). However, such substances may be detected during environmental monitoring and associated with historical contamination, activities in the port area, or value chain processes. Environmental monitoring data indicate that certain pollutants, such as heavy metals (chromium, nickel, copper) or organic compounds (e.g., tributyltin), may be present in the environment.

Data on these substances are collected through environmental monitoring in accordance with legal requirements, and their quantities are presented in section E2-4 "Pollution of air, water and soil". Separate summaries of the quantities of substances of concern or SVHC are not compiled, as these substances are not directly used in the company's operations; however, their presence is assessed through the overall pollution monitoring system.

E2-6

Based on a double materiality assessment, the Port Authority has identified four pollution-related risks: exceedances of air pollution limits, water pollution, pollution incidents, and non-compliance with environmental protection requirements in contracting and land lease agreements.

The potential financial impact of all four risks is currently assessed as very low (up to 100,000 EUR per year), which reflects the functioning environmental monitoring programme, preventive investments (incident detection equipment, regular training), and contractual safeguards.

The greatest identified uncertainty is the impact on operational continuity and the achievement of strategic goals in the areas of pollution incidents and breaches of contracting agreements, which is assessed as low in the long term (5–10 years) (100,000 – EUR 1 million). In the area of water pollution, the likelihood is assessed as very high in the medium and long term, thus maintaining a high level of monitoring and preventive investments..

Currently, the Port Authority has not identified pollution risks that could have a significant financial impact exceeding existing insurance and preventive measures.

Biodiversity and ecosystems

The activities of the Klaipėda State Seaport Authority are conducted in an area directly related to the ecosystems of the Baltic Sea and the Curonian Lagoon, making the protection of biodiversity and the monitoring of ecosystem conditions an important part of the company's environmental management. The Port Authority implements environmental monitoring programmes and applies measures aimed at reducing the impact of operations on water ecosystems and coastal environments.

This section provides information on aspects of biodiversity and ecosystem protection related to the company's activities, in accordance with the requirements of the European Sustainability Reporting Standard ESRS E4 "Biodiversity and Ecosystems".

Disclosure Requirements List

IRO-2

ETAS 2	General Disclosures	Reference
IRO-1	Description of material impacts, risks, and opportunities related to biodiversity and ecosystems	20
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	56
E2-2	Policies related to biodiversity and ecosystems	57
E2-3	Actions and resources related to biodiversity and ecosystems	57
E2-4	Targets related to biodiversity and ecosystems	57
E2-5	Impact metrics related to biodiversity and ecosystems change	58

Material impacts, risks, and opportunities related to biodiversity and ecosystems

SBM-3

Based on a double materiality assessment, biodiversity and ecosystems are material topics due to the scale of Port of Klaipėda operations and its proximity to ecologically sensitive areas. The development of port infrastructure, water area dredging works, and the formation of quays can cause noise and vibration, erosion of quays, changes in water salinity, and hydrodynamic conditions, thus the impact on aquatic ecosystems may manifest both in the short term and over a longer period.

The protected areas adjacent to the port – the Smeltė Botanical Reserve, the Curonian Spit National Park, and the Curonian Lagoon Biosphere Polygon (Natura 2000 area) – necessitate special attention to the protection of biodiversity. Although there is currently no evidence that port activities have had a significant negative impact on protected species, the decline in populations of certain species, such as the sea aster, is associated with broader habitat changes and the spread of invasive species.

Additional risks may arise from the impact of companies operating within the port area, particularly related to the discharge of surface runoff water or historically accumulated pollutants in the soil. Although the impact of these factors on ecosystems is not fully established, the likelihood of pollution incidents and the presence of sensitive ecosystems create a continuous need to monitor environmental conditions and implement preventive environmental measures.

At the same time, the Port Authority is implementing activities that can have a positive impact on local ecosystems, such as organizing land mowing and environmental management initiatives that contribute to the maintenance of sensitive habitats and the support of biodiversity.

Material impacts	Description	Location in the value chain
Potential negative impact	The operation and maintenance of port infrastructure, including shipping activities, dredging works, and quay management, can cause noise and vibration, erosion of quays, changes in water salinity and currents, and other environmental factors that may affect local ecosystems. Considering that the port borders the Curonian Spit National Park (UNESCO) and the Curonian Lagoon Biosphere Polygon (Natura 2000), the protection of biodiversity is regarded as a significant environmental aspect.	Direct activity
Actual positive impact	The Port Authority conducts land maintenance and environmental management activities, including mowing and environmental cleaning initiatives, which contribute to the maintenance of sensitive ecosystems and the preservation of biodiversity.	Direct activity
Actual negative impact	The impact on biodiversity may arise from the activities of tenants and other participants in port operations, particularly related to the potential release of pollutants into the environment, which may affect the condition of water and coastal ecosystems.	Downstream chain

Policies related to biodiversity and ecosystems

E4-2

The company currently does not have a separate policy dedicated to the protection of biodiversity and ecosystems. Environmental commitments related to ecosystem protection are enshrined in the Sustainability Policy approved in April 2025, which establishes a commitment to protect the Baltic Sea ecosystem by ensuring effective pollution management and waste handling according to circular economy principles.

Practical biodiversity protection measures are implemented through the environmental monitoring programme of the Klaipėda State Seaport, which systematically monitors the ecological status of the port's water area, the Curonian Lagoon, and the Klaipėda Strait. Infrastructure projects are carried out in accordance with the requirements of the Law on Environmental Impact Assessment of the Proposed Economic Activity, and the condition of the Smeltė Botanical Reserve is monitored through ongoing monitoring and supporting habitat management work.

Actions and resources related to biodiversity and ecosystems

E4-3

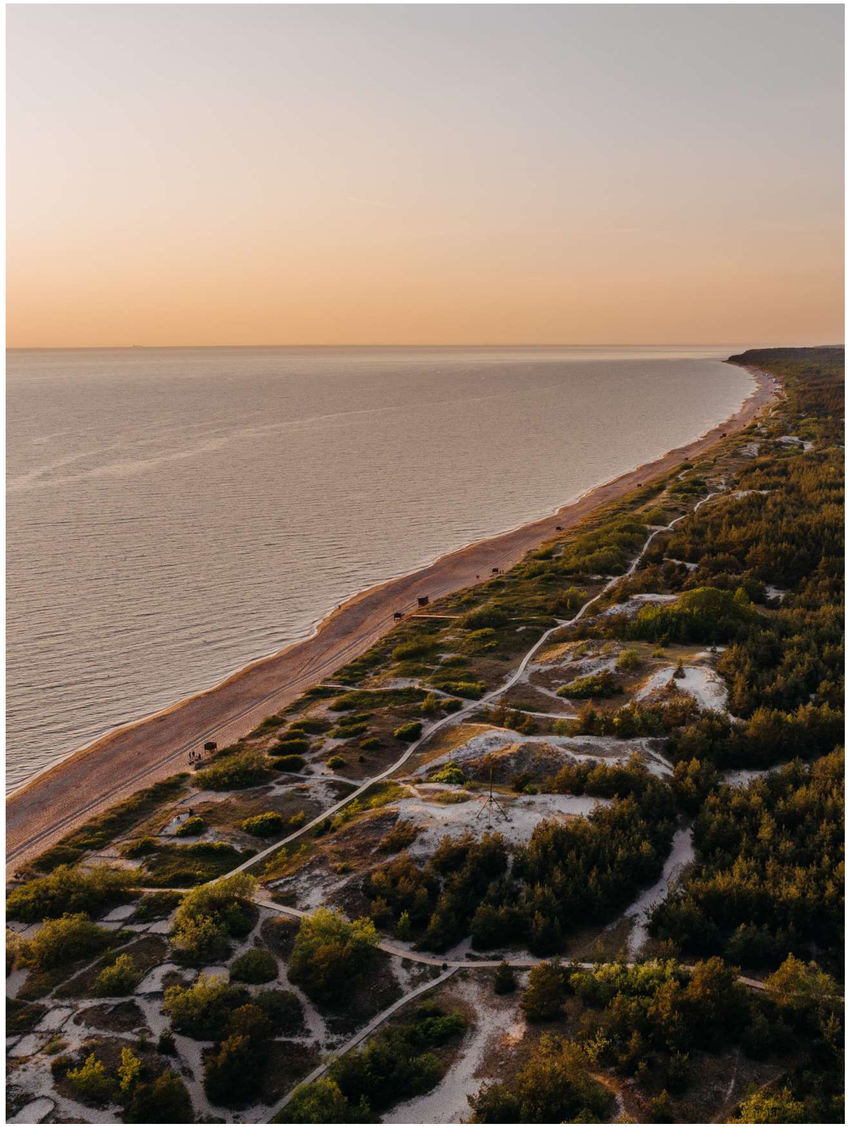
The condition of biodiversity and ecosystems in the Klaipėda State Seaport area and adjacent areas is assessed through the environmental monitoring programme of the Klaipėda State Seaport. The monitoring programme provides for the systematic observation of the state of the environment and its components in the water area, in the sea landfill area, and in the coastal zone. During the monitoring, data on the state of the environment is collected and analyzed, which is used to assess changes in environmental components and the potential impact of port activities on the environment.

The Port Authority implements comprehensive measures for the protection of biodiversity and the management of ecosystem impacts. All infrastructure projects and dredging works are carried out in accordance with environmental impact assessment requirements, implementing impact mitigation and compensatory measures. Compensatory measures for the protection of biodiversity and ecosystems are being implemented, including the installation of underwater walls, and a project for the southern port gates is also planned.

Monitoring of fish migrations allows for timely cessation of work and avoidance of disturbances during sensitive periods, while port environmental monitoring enables the observation of geomorphological and hydrological changes. The Smeltė botanical reserve is maintained through ongoing monitoring and funding for mowing works, which contribute to the conservation of protected plant species.

An operational response system is in place for managing pollution incidents, and the quality of surface runoff water is continuously tested to reduce potential impacts on the Curonian Lagoon.

Although not all pollution sources caused by companies operating in the port area can be directly controlled, the Port Authority applies monitoring measures and implements actions aimed at reducing historical pollution. These measures contribute to the preservation of biodiversity and the condition of ecosystems in the port area and surrounding areas.



Targets related to biodiversity and ecosystems

E4-4

The Klaipėda State Seaport Authority conducts activities related to the protection of biodiversity and ecosystems and their condition monitoring. The implementation of these activities is based on the environmental monitoring programme of the Klaipėda State Seaport, under which the condition of environmental components in the water area, Curonian Lagoon, and Baltic Sea coastal areas is systematically monitored.

The aim of this programme is to ensure the monitoring of changes in the state of the environment, assess the impact of port activities on ecosystems, and identify potential environmental changes. Monitoring data is used to plan environmental protection measures and assess the impact of infrastructure projects and port dredging works on the environment.

Additionally, measures are being implemented for the maintenance of sensitive ecosystems and protected areas, including monitoring the condition of vegetation and populations of protected halophytes in the Smeltė botanical reserve according to the monitoring programme. The Port Authority also supports maintenance work in the reserve – mowing and other habitat management measures aimed at preserving the habitats of protected species. Surface water quality monitoring and measures for the prevention of and response to pollution incidents, designed to minimize potential impacts on the ecosystems of the Curonian Lagoon, are implemented in accordance with the Green Seaport Concept (Green Seaport Concept of the Klaipėda State Seaport, 2022).

Currently, specific quantitative biodiversity targets have not been established – the state of biodiversity is assessed through environmental monitoring, and further protection measures are planned based on its data.

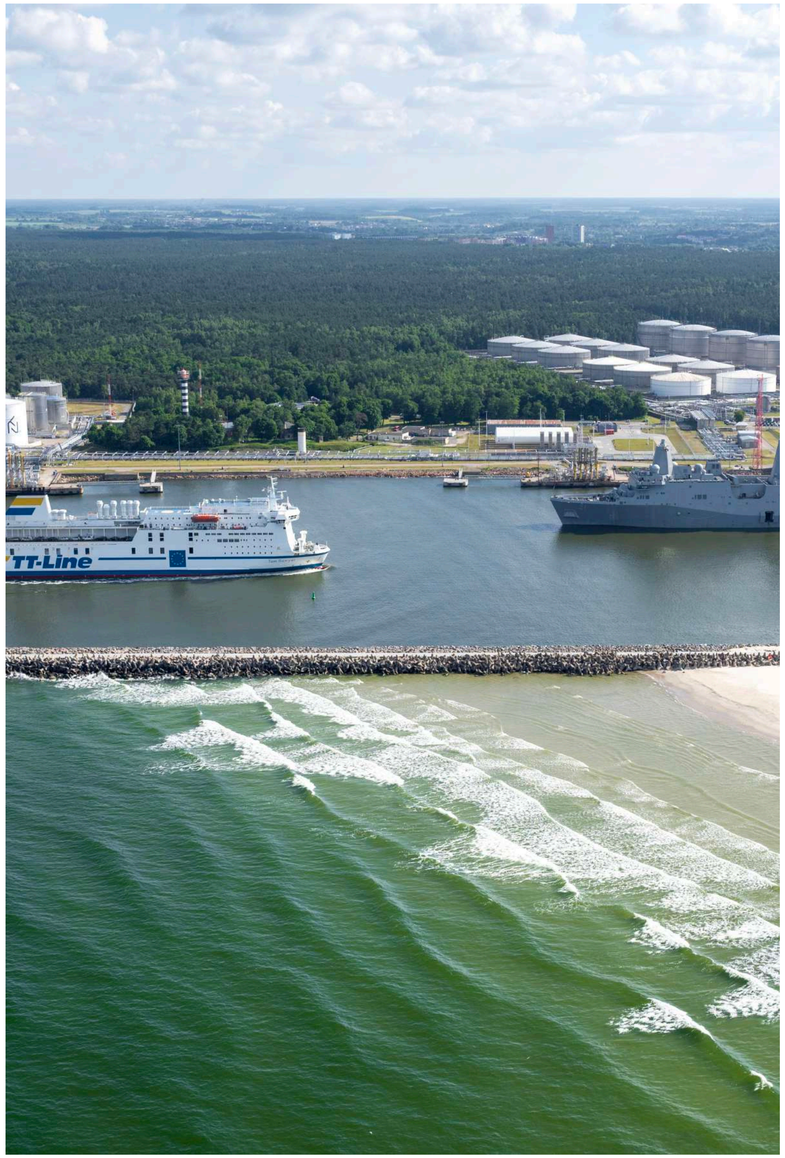
Impact metrics related to biodiversity and ecosystems change

E4-5

Changes in biodiversity and ecosystems in the Klaipėda State Seaport area and adjacent water ecosystems are assessed based on data collected during environmental monitoring. During monitoring, biological and environmental condition indicators are analyzed, allowing for the observation of the state of water ecosystems and potential changes.

When assessing the state of biodiversity, indicators of biological communities and environmental components are analyzed, including the species composition and population status of fish, the structure and changes of benthic macroinvertebrate communities, the spread of invasive species in aquatic ecosystems, chlorophyll-a concentration as an indicator of eutrophication and ecological status of water, the accumulation of heavy metals in fish tissues, and the status of vegetation and protected halophyte populations in the Smeltė botanical reserve. This data is used to identify potential changes in ecological status and to assess the condition of environmental components in the water area and adjacent territories. Indicators for monitoring the state of biodiversity and ecosystems are presented in the table below.

Indicator	Description	Impact on emissions
Condition of fish communities	The species composition and population status of fish in the water area and adjacent water bodies are assessed.	Ichthyological studies
Condition of macrozoobenthos	The structure and changes of benthic invertebrate communities are analyzed.	Monitoring of macrozoobenthos
Spread of invasive species	The distribution and spread of invasive species in aquatic ecosystems are assessed.	Monitoring of biota
Chlorophyll-a concentration	This indicator is used to assess the quantity of phytoplankton and the ecological status of water.	Chlorophyll-a studies
Chemical composition of	The accumulation of pollutants in biological organisms is investigated.	Chemical studies of biota
Condition of vegetation in protected areas	The condition of the vegetation in the Smeltė botanical reserve is assessed.	Vegetation monitoring



Resource use and circular economy

The activities of the Klaipėda State Seaport Authority are closely related to significant consumption of construction and operational resources. The main resource needs arise from the ongoing maintenance of port infrastructure and development projects, which require quantities of concrete, steel, asphalt, fillers, and other construction materials. Since the main activity of the Port Authority is infrastructure management rather than direct production processes, most resources are incorporated into port operations through contractors. Additionally, the Company directly uses electricity, water, fuel, and communication and management systems.

This section provides information on the structure of the Company's resource usage, the efficiency principles applied, and the implementation of circular economy solutions, in accordance with the requirements of the European Sustainability Reporting Standard E5.

Disclosure Requirements List

IRO–2

ETAS 2	General Disclosures	Reference
IRO-1	Description of material impacts, risks, and opportunities related to resource use and the circular economy	59
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	59
E5-1	Policies related to resource use and circular economy	59
E5-2	Actions and resources related to resource use and circular economy	60

Material impacts, risks, and opportunities related to resource use and the circular economy

IRO-1

According to the double materiality assessment, resource use in the activities of the Port Authority is a material topic, primarily related to the maintenance and development of port infrastructure. Port infrastructure projects require a significant quantity of construction materials, including concrete, steel, asphalt, fillers, soil, and sand. The use of these resources primarily occurs through contractors who carry out construction work and supply materials needed for infrastructure projects, thus the impact is manifested at the beginning of the value chain.

Although the main activity of the Port Authority is providing services and managing port infrastructure, resource use is inevitably linked to the implementation of infrastructure projects. The resources directly used by the Port Authority mainly include electricity, water, fuel, communication services, and equipment necessary for managing port operations.

The impact of resource use is mainly associated with infrastructure development projects during which construction materials are utilized. Considering that project implementation is carried out in accordance with established technical requirements and strict accounting and control of resource quantities is applied, the scale of impact is assessed as limited. Nevertheless, the topic remains relevant in the medium- and long-term due to the ongoing development of port infrastructure and the associated demand for materials.

SBM-3

Material impacts	Description	Location in the value chain
Potential negative impact	The development of port infrastructure is associated with significant use of construction and natural resources, including concrete, steel, asphalt, fillers, soil, and sand, thus the implementation of infrastructure projects may increase the demand for these resources	Direct activity

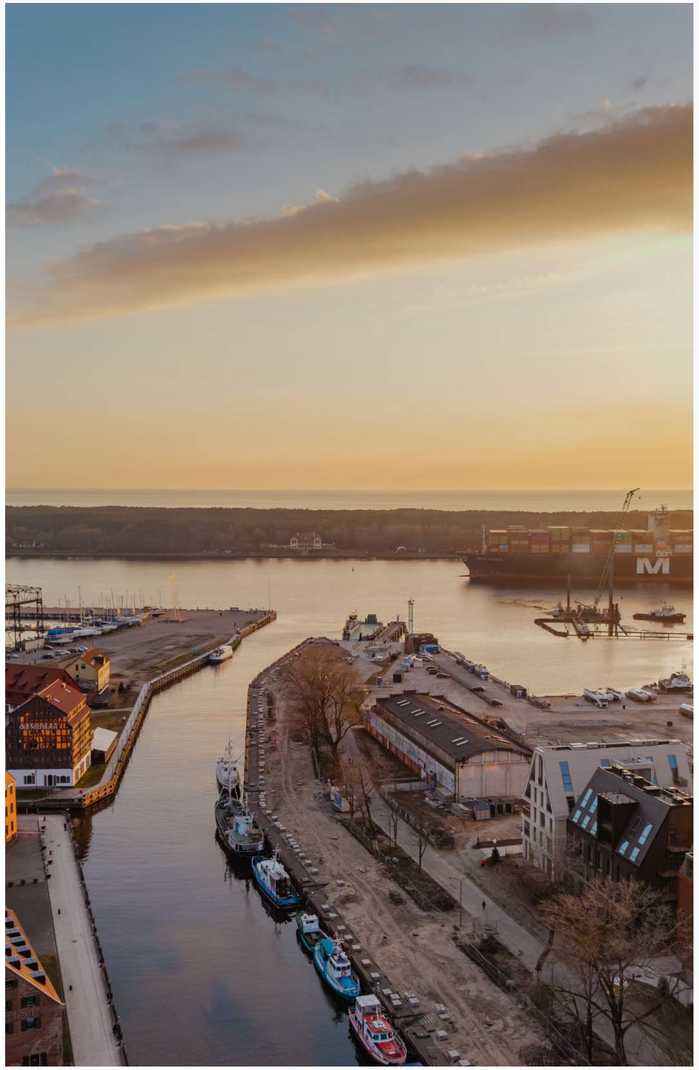
Policies related to resource use and circular economy

E5-1

The Klaipėda State Seaport Authority's approach to resource use and the implementation of circular economy principles is based on the Sustainability Policy approved in April 2025, which establishes a commitment to handle and recycle waste according to circular economy principles, as well as to develop infrastructure that meets sustainable development principles and EU taxonomy requirements. The Sustainability Policy applies to all activities of the Port Authority, encompassing infrastructure management, development, and collaboration with stakeholders.

The principles of practical resource management are implemented through the supervision processes of construction and infrastructure projects. Contractors are required to manage resources in accordance with the specified volumes, and the contracts stipulate that at least 70 percent (by weight) of non-hazardous construction waste suitable for recycling must be sorted, prepared for reuse, recycled, or otherwise utilized (excluding relevant soil and stone waste), and supporting documentation must be submitted to the Customer.

The sand excavated during dredging works, which meets quality requirements, is used for beach replenishment, thereby reducing the need for primary resources. The Port Authority is also developing infrastructure for waste collection from vessels, contributing to more sustainable resource use in the value chain.



Actions and resources related to resource use and circular economy

E5-2

The company implements actions related to resource use and circular economy principles through infrastructure management, construction supervision, and waste management processes. The aim of these actions is to reduce the consumption of primary resources, increase the share of waste reuse, and integrate circular economy principles into port operations and the value chain.

In construction and infrastructure projects, it is required that at least 50–70 percent of non-hazardous construction waste be sent for secondary use. Metal waste is handed over to recyclers, and waste generated during operations is managed according to waste management contracts. These measures are continuously implemented throughout all infrastructure projects.

Reuse of excavated soil

The sand excavated during dredging and cleaning works, which meets quality requirements, is used for beach replenishment, thus reducing the need for primary fill materials. Scope IV contaminated soil, which cannot be dumped at sea, is stored in specially designated areas or managed according to waste legislation to prevent additional environmental pollution.

Collection of waste from vessels

The Port Authority is developing infrastructure for waste collection from vessels. In the near future, it is planned to start operating a dedicated waste collection vessel, which will ensure better control of waste flows and contribute to more sustainable resource management in the value chain. This measure will also reduce the risk of vessel waste entering the water area.

Resource use control in the value chain

Contractors carrying out construction and infrastructure works must manage materials precisely according to the specified volumes, while the Port Authority supervises these processes. The Business Partner Code of Conduct establishes environmental requirements for suppliers and contractors, including the sustainable use of resources and waste management. Green procurement requirements, implemented according to legal provisions and ISO standards, promote the selection of more sustainable materials and services.

Allocated resources

Resources for managing resource use and implementing circular economy measures are allocated through infrastructure development budgets, environmental monitoring programmes, and the activities of the Sustainability and Environmental Protection Division. Currently, there are no specific allocated financial resources identified for this area – expenses are integrated into project and operational budgets.

Disclosure of informatio according to the EU Taxonomy Regulation

Explanation of abbreviations used

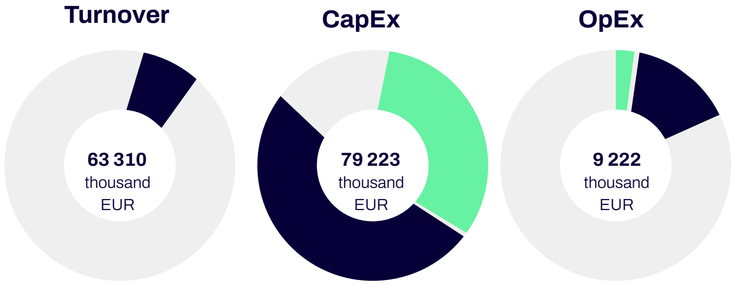
Category	Code	Explanation
Substantial contribution criteria	T	Yes – taxonomy-aligned activity, aimed at achieving a specific environmental objective
	N	No – activity that is not taxonomy aligned, aimed at achieving a specific environmental objective
	TNE	Taxonomy-non-aligned activity regarding the relevant objective
Do No Significant Harm (DNSH) criteria and necessary safeguards	T	Yes
	N	No
Goal	CCM*	Climate change mitigation
	CCA**	Adaptation to climate change

** Environment Delegated Act (2023/2486)*
*** Climate Delegated Act (2021/2139)*

By voluntarily preparing sustainability information according to the European Sustainability Reporting Standards (ESRS) and following the requirements of the EU Taxonomy Regulation, the Company discloses data on key performance indicators (KPIs) and related information. This disclosure of information has been prepared to ensure a high level of transparency, reporting, and comparability, allowing stakeholders to objectively assess the environmental sustainability of the Company's activities and their compliance with EU taxonomy criteria, as well as to consistently prepare for mandatory sustainability reporting under the Corporate Sustainability Reporting Directive (CSRD).

A summary of taxonomy indicators for 2025 according to three main financial indicators – turnover, capital, and operational expenditure – is presented in the diagram below.

EU taxonomy indicators 2025



Category	%	Amount (thousand EUR)
Corresponding	0,07%	43
Taxonomic not meeting criteria	11,00%	6 983
Non-taxonomic	88,93%	56 285

Category	%	Amount (thousand EUR)
Corresponding	33,07%	26 275
Taxonomic not meeting criteria	52,92%	41 926
Non-taxonomic	13,91%	11 022

Category	%	Amount (thousand EUR)
Corresponding	1,40%	130
Taxonomic not meeting criteria	10,54%	971

The diagram illustrates that the greatest progress has been made in the area of capital expenditures: 33.07% (EUR 26,275 thousand) of all investments are fully aligned with the EU Taxonomy requirements, while the share of taxonomy-eligible investments reaches as high as 86.09%. The shares of operating expenses and turnover-aligned activities remain lower but show a trend of growth compared to 2024.

Detailed tables of financial indicators (Revenue, CapEx, and OpEx), prepared in accordance with the requirements of Annex II of Delegated Regulation (EU) 2021/2178, covering the classification of activities according to environmental objectives, the Substantial Contribution (TSC), and the Do No Significant Harm (DNSH) criteria matrices, are presented in Annex 2 of the report.

Basis of the EU Taxonomy Regulation

The EU Taxonomy Regulation (EU) 2020/852 establishes a classification system for sustainable economic activities and common terms that define environmentally sustainable activities. The main objective of this regulation is to help direct investments towards more sustainable activities by providing investors, companies, and legislators with precise definitions of environmentally sustainable economic activities, thereby contributing to the implementation of the European Green Deal.
The Klaipėda State Seaport supports the aim of directing investments into sustainable projects and infrastructure. According to Article 8 of the Regulation, the Klaipėda State Seaport Authority (KSSA) discloses information about the compliance of its economic activities with environmental sustainability criteria. In the reporting year 2025, the assessment was conducted based on the Climate Delegated Act (Regulation (EU) 2021/2139) and the Environmental Delegated Act (Regulation (EU) 2023/2486).

Legal basis and methodology

The Klaipėda State Seaport Authority (KSSA) discloses information about the compliance of its economic activities with environmental sustainability criteria in accordance with Article 8 of the European Parliament and Council Regulation (EU) 2020/852 (Taxonomy Regulation). In the reporting year 2025, the assessment was conducted based on the Climate Delegated Act (Regulation (EU) 2021/2139) and the Environmental Delegated Act (Regulation (EU) 2023/2486).

The assessment covers three environmental objectives that are relevant to the activities carried out by KSSA:

- Climate change mitigation (CCM) – projects that reduce GHG emissions in the transport sector (onshore power supply, zero-emission vessels, renewable energy).
- Climate change adaptation (CCA) – infrastructure that enhances the port's resilience to hydrometeorological phenomena (coastal protection walls, wave measuring equipment, floating pontoons).
- Pollution prevention and control (PPC) – environmental remediation activities (removal of oil pollutants in the port's water area).

For an activity to be recognized as taxonomy-aligned, it must:

- Significantly contribute to at least one environmental objective (TSC);
- Do no significant harm (DNSH) to other objectives;
- Meet minimum social safeguards (MSS).

Key accounting principles

In preparing the 2025 report, the following principles were applied:

- **Dual accounting prevention:** each line of expenses or income is assigned to only one taxonomy-aligned activity and only one environmental goal.
- **Strict OpEx definition (narrow base):** only direct costs related to the maintenance, repair, and servicing of fixed assets are included in the OpEx denominator (as per Delegated Regulation (EU) 2021/2178 Annex I Clause 1.1.3.2).
- **Conservative compliance assessment without materiality exceptions:** activities that do not meet TSC requirements in the first stage (e.g., fossil fuel-powered fleet, buildings without A energy class) are automatically classified as taxonomy-eligible but not aligned.
- **Non-taxonomy-aligned expenses:** costs for dredging the water area, fines, and compensations are excluded.

Summary of financial indicators (2025)

Below is a summary of financial indicators related to taxonomy-eligible and aligned activities (thousand EUR and percentage of total).

Financial indicator	Total amount (thousand EUR)	Eligible amount thousand EUR/%)	Aligned amount (thousand EUR)	Aligned amount (thousand EUR)
Turnover	63 310,28	7 025,16 / 11,10 %	42,62	0,07 %
Capital expenditures (CapEx)	79 223,14	68 201,64 / 86,09 %	26 275,44	33,07 %
Operational expenditure (OpEx)	9 221,77	1 100,66 / 11,94 %	129,53	1,40 %

***NB:** Highlighted in a green are amounts that are taxonomy-aligned. Highlighted in a blue are total amounts and amounts that are taxonomy-eligible.*

Key identified taxonomy-eligible activities

The Port Authority, after reviewing its economic activities and investment projects, identified the following European Union taxonomy-eligible activities, directly contributing to the assurance and development of KSSA activities.

6.16. Water transport infrastructure

A key category of KSSA's operations, accounting for the majority of the port's capital expenditures (CapEx) and revenue: the construction, renovation, and leasing of quays (e.g., quays 21–23A); climate resilience solutions—design of quay protection walls, wave measurement equipment, and pontoon jetties (PKK); investments in and development of port management systems (KIPIS, SCADA, GISGRO) and traffic safety equipment; onshore power supply (OPS) infrastructure, including charging stations for hybrid boats.

6.10. Cargo maritime and coastal water transport, vessels designated for port operations and auxiliary activities.

Acquisition, modernization, operational repair, and maintenance of personnel for the auxiliary fleet (pilot boats, hydrographic and diving vessels, waste collection vessels).

3.10. Hydrogen production

Development of infrastructure for green fuel production and refueling stations at the port.

2.4. Cleanup of contaminated sites and areas

Operational expenditure and corresponding revenues allocated for the elimination of accidental pollution (oil products) in the water area, using specialized cleaning equipment (booms).

7.1. Construction of new buildings

Investments in the construction and design of administrative (N. Uosto g. 3) and fleet base buildings.

7.7. Acquisition and ownership of buildings

Operational expenditure (OpEx) on buildings managed by KSSA and revenue from the lease of premises (cafeteria).

6.14. Rail transport infrastructure

Repair of railways and access roads located within the port area.

Preparatory work for the reconstruction of electrical overhead lines (110 kV) in the port area.

4.9. Electricity transmission and distribution

Preparatory work for the reconstruction of electrical overhead lines (110 kV) in the port area.

7.6. Installation of renewable energy technology

Installation of solar photovoltaic power plants on buildings managed by KSSA.

6.5. Transporting by motorcycles, passenger cars, and light commercial vehicles

Acquisition of electric vehicles (CapEx) and operational expenditure (OpEx) of service transport.

3.4. Maintenance of roads and highways

Services for the renewal and capital repair of port areas, access roads, and streets (Circular economy goal).

8.1. Data processing, hosting, and related activities

Investments in the support and development of information systems (KIPIS licenses, digital maps) related to server rental and cloud services.

Disclosure of Turnover

Methodology and Calculation Principles

The turnover indicator is calculated in accordance with the provisions of Annex I of Delegated Regulation (EU) 2021/2178 and consists of two parts:

- **Denominator** – net sales revenue according to IFRS/ASBE. The total turnover of KSSA in 2025 amounted to EUR 63,310.28 thousand.
- **Numerator** – the portion of revenue derived from taxonomy-aligned activities, i.e., activities that: (1) significantly contribute to at least one environmental objective (TSC); (2) Do No Significant Harm (DNSH) to other objectives; (3) meet minimum social safeguard requirements (MSS).

Summary of results for 2025

11.10 % (EUR 7,025.16 thousand) of total revenue is attributed to taxonomy-eligible activities – the largest portion consists of land lease income for infrastructure (quays) under activity 6.16.

Taxonomy-aligned revenue constitutes 0.07% (EUR 42.62 thousand) – this exclusively comes from small fishing vessel dock revenues (activity 6.16), significantly contributing to the climate change adaptation (CCA) objective.

The majority of the revenue from quay lease (EUR 6,700.29 thousand) was deemed eligible but classified as not aligned: due to the diverse use of infrastructure, the technical verification criteria for the CCM are not met; therefore, in accordance with the principle of conservative valuation, this amount is accounted for as “eligible but not aligned” (“taxonomy-eligible but not aligned”) without any materiality exceptions.

Name of Economic Activity	Taxonomy Code	Revenue (thousand EUR)	Share of Revenue (%)	Eligible	Aligned
Land rental for infrastructure (quays)	6.16	6 700,29	10,58%	Yes	No
Revenues from small fishing vessel docks	6.16	42,62	0,07%	Yes	Yes
KIPIS usage service	8.1	219,01	0,35%	Yes	No
Canteen rental	7.7	31,92	0,05%	Yes	No
Pollution remediation works	2.4	31,33	0,05%	Yes	No
Total amount of taxonomy-eligible activities		7 025,16	11,10%		
Total amount of taxonomy-aligned activities		42,62	0,07%		
Total organization revenue (Denominator)		63 310,28	100,00%		

Disclosure of capital expenditures (CapEx)

Methodology and Calculation Principles

The CapEx indicator is calculated according to the provisions of Delegated Regulation (EU) 2021/2178 and consists of two parts:

- **Denominator** – acquisitions of tangible and intangible assets, capitalized expenses, and recognized values of usage rights (leases). Total capital investments of KSSA in 2025 amounted to EUR 79,223.14 thousand.
- **Numerator** – capital expenditures directly related to taxonomy-aligned assets or processes, as well as investments that are part of the approved CapEx plan aimed at expanding aligned activities or converting an eligible activity into an aligned one.

Summary of results for 2025

A total of 86.09% (EUR 68,201.64 thousand) of total capital expenditures are directed towards taxonomy-eligible activities – this is an extremely high level of inclusion, reflecting large-scale modernization of port infrastructure.

Taxonomy-aligned investments account for 33.07% (EUR 26,275.44 thousand). The largest share of aligned CapEx consists of:

- water transport infrastructure and quay reconstruction, enabling low-emission transport – 21.22%;
- acquisition of a waste collection vessel with an electric power plant – 7.53%;
- development of green fuel (hydrogen) production infrastructure – 4.32%.

Classification logic for the quays No. 21–23A project (cost separation)

The construction and reconstruction project of quays No. 21–23A (cruise ship terminal) is assessed as a mixed-use investment during the reporting period. To ensure compliance with EU Taxonomy requirements, project costs were divided into two logical parts:

Taxonomy-aligned part: investments assigned exclusively to onshore power supply (OPS) infrastructure, charging stations for hybrid boats, and other components enabling low-emission transport (meets the criteria of CCM 6.16 “enabling activity”).

Eligible but not aligned part: assigned expenses related to the general infrastructure of quays and cruise terminals designed to accommodate all vessels, including those using traditional fossil fuels. According to the Technical Screening Criteria (TSC), this infrastructure cannot be assessed as exclusively enabling low-emission transport.

This separation was made based on the project’s technical documentation stage estimates and the list of works.

Linking non-operational projects to the approved investment (CapEx) plan

According to the requirements of point 1.1.2.2 (b) of Annex I of Delegated Regulation (EU) 2021/2178, taxonomy-aligned capital expenditures (Aligned CapEx) for projects that have not yet begun operation during the reporting period are recognized only if they are part of an officially approved investment (CapEx) plan. This plan ensures that the activities carried out will meet the technical screening criteria within a maximum implementation period of 5 years.
The Port Authority’s 2026–2029 Strategic Action Plan (SAP), which includes investments totalling EUR 733 million, provides for the implementation of key projects that are taxonomy-aligned but not yet operational. The table below details the linkage of these projects to the investment plan and the proposed implementation schedules:

Project and Taxonomy Code	Approved investment plan	Implementation period	Key project stages
Waste collection vessel with electric power plant (CCM 6.10, transition activity)	KSSA 2026–2029, SAP, confirmed	2024–2027	2025: The vessel has been ordered and is under construction; First half of 2026: The vessel “Rasa” is to be built, brought to port, and subjected to waste collection testing (using electricity); Second half of 2026: Full-scale operation using hydrogen is scheduled to begin.
Infrastructure for the production of green hydrogen (CCA / CCM 3.10)	KSSA 2026–2029, SAP, confirmed	2025–2026	2025: Infrastructure installation works are underway; March 2026: Electricity generation begins at the power plant; June 2026: Hydrogen production is expected to commence.
Reconstruction of quays No. 21, 22, 23 and construction of quays No. 21A, 22A, 23A	KSSA 2026–2029, SAP, confirmed	By 2028	2026: Reconstruction and construction works (Q1–Q4); 2027–2028: final works and commencement of operations.
Infrastructure for onshore power supply (OPS) (CCM 6.16)	KSSA 2026–2029, SAP, confirmed	2026–2029	2026: preparatory works and procurements; 2027–2029: Contract works, equipment installation, and commencement of operations.

A detailed breakdown of capital expenditures for 2025 according to EU Taxonomy activities is provided. In the table, capital expenditures are grouped by main EU taxonomy-aligned activities. A detailed breakdown by individual projects and investment objects is compiled in the company's internal Taxonomy assessment register.

Some large investments – construction of an administrative building and reconstruction of quays without an officially approved CapEx plan (e.g., for shore electricity supply infrastructure) – have been conservatively accounted for during the reporting period as "taxonomy-eligible but not aligned".

Investment (CapEx) name	Taxonomy Code	CapEx (thousand EUR)	CapEx Share (%)	Eligible	Aligned
Water transport infrastructure (reconstruction, construction of quays, electricity supply, etc.)	CCM 6.16	38 431,95	48,51%	Yes	Partially
Water transport infrastructure (adaptation of quays and breakwaters to climate change)	CCM 6.16	7 179,85	9,06%	Yes	Partially
Cargo maritime and coastal water transport (Acquisition and repair of pilot boats and other special vessels)	CCM 6.10, CCA 6.10	6 030,62	7,61%	Yes	Partially
Rail transport infrastructure (Repair)	CCM 6.14	461,97	0,58%	Yes	No
Transportation by motorcycle and passenger cars (Acquisition of electric vehicles)	CCM 6.5	65,70	0,08%	Yes	Yes
Hydrogen production (Development of green fuel production)	CCA 3.10	3 456,37	4,32%	Yes	Yes
Production of low carbon transport technologies (Shipbuilding)	CCM 3.3	4 117,34	5,20%	Yes	No
Transmission and distribution of electricity (Network development)	CCM 4.9	0,03	0,00%	Yes	No
Installation of renewable energy technologies (Solar power plants)	CCM 7.6	0,03	0,00%	Yes	No
Construction of new buildings (Construction of administrative buildings)	CCM 7.1	8 439,78	10,65%	Yes	No
Data processing, hosting, and related activities (Modernization of IT systems)	CCM 8.1	48,01	0,06%	Yes	No
Total amount of taxonomy-eligible activities (A.1 + A.2)		68 201,64	86,09%		
Total amount of taxonomy-aligned activities (Only A.1)		26 275,44	33,07%		
Total amount of taxonomy non-eligible activities (B)		11 021,50	13,91%		
Total CAPEX (Denominator)		79 223,14	100,00%		

Capital Expenditure (CapEx) Table (thousand EUR)

Calculation of operational expenditure (OpEx) indicator

Methodology and Calculation Principles

The OpEx indicator is calculated strictly in accordance with the provisions of Annex I, Clause 1.1.3.2 of Delegated Regulation (EU) 2021/2178 and consists of two parts:

- **Denominator** – direct non-capitalized expenses related to R&D, building renovation, short-term rental, technical maintenance and repairs, and other expenses necessary to ensure the functioning of fixed assets. The total KSSA OpEx denominator for 2025 amounted to EUR 9,221.77 thousand. Depreciation, amortization, and general administrative expenses are not included in the denominator.
- **Numerator** – the portion of operating costs related to assets or processes that meet taxonomy requirements, including direct asset maintenance needs.

Summary of results for 2025

11.94% (EUR 1,100.66 thousand) of all OpEx costs are attributed to taxonomy-eligible activities.

Taxonomy-aligned costs account for 1.40% (EUR 129.53 thousand). They consist exclusively of two activities:

- Maintenance of water transport infrastructure (Activity 6.16) – EUR 110.63 thousand;
- Cleanup of contaminated sites (Activity 2.4) – EUR 18.90 thousand.

The remaining portion of eligible costs is accounted for as “eligible but not aligned” (“taxonomy-eligible but not aligned”) for two objective reasons: the operating costs of the existing diesel auxiliary fleet do not meet the zero or low emissions TSC requirements; there is a lack of formal evidence of DNSH compliance for railway infrastructure maintenance costs. The assessment was conducted without any materiality exceptions.

Cost name	Taxonomy Code	OpEx (thousand EUR)	OpEx share (%)	Eligible	Aligned
Railway repair and maintenance	CCM 6.14	468,84	5,08%	Yes	No
Water transport infrastructure (quay repairs, environmental and meteorological costs, internet services)	CCM 6.16, CCA 6.16	272,23	2,95%	Yes	Partially
Cargo maritime and coastal water transport (Operation of pilot boats, repairs, mechanics’ wages, rescue costs)	CCM 6.10	119,74	1,30%	Yes	No
Data processing, hosting, and related activities (Computer networks and maintenance)	CCM 8.1	113,52	1,23%	Yes	No
Port area and road maintenance (Maintenance and repairs)	CE 3.4	49,08	0,53%	Yes	No
Acquisition and ownership of buildings (Operational and repair costs of premises)	CCM 7.7	36,65	0,40%	Yes	No
Transporting by motorcycles, passenger cars, and light commercial vehicles (Car repairs)	CCM 6.5	21,71	0,24%	Yes	No
Cleaning of contaminated sites and areas (Collection of spilled pollutants)	PPC 2.4	18,90	0,20%	Yes	Yes
Total amount of taxonomy-eligible activities		1 100,66	11,94%		
Total amount of taxonomy-aligned activities		129,53	1,40%		
Total amount of taxonomy non-eligible activities		8 121,11	88,06%		
Total OPEX (Denominator)		9 221,77	100,00%		

Operational expenditure (OpEx) table (thousand EUR)

Nuclear and fossil fuel activities

In accordance with the requirements of the Taxonomy Regulation, information is disclosed regarding activities related to nuclear energy and natural gas.

Activity description	Applicable (Yes/No)
The company funds research, development, and demonstration of nuclear facilities.	No
The company carries out or funds the construction or operation of new nuclear facilities.	No
The company carries out or funds the safe operation of existing nuclear facilities.	No
The company carries out or funds electricity generation using gaseous fossil fuels.	No
The company carries out or finances the construction or operation of combined heat/cooling and electricity	No
The company carries out or finances the construction or operation of heat generation facilities that use fossil gas fuel.	No

Changes compared to 2024

In order to ensure the continuity of the report and provide stakeholders with comprehensive information about the dynamics of the company's taxonomic assessment, a comparative analysis for 2024–2025 is presented below, covering changes in financial indicators, shifts in activity composition, and methodological innovations.

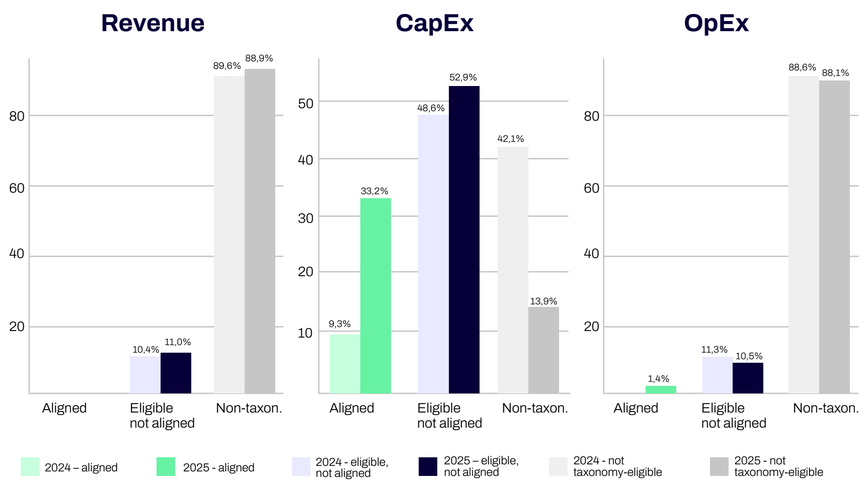
Dynamics of financial indicators

When comparing the 2025 taxonomy with that of 2024, the following key trends are observed:

Indicator	2024	2025	Reason for change
Turnover (Eligible)	10,44 %	11,10 %	Consistent growth of eligible revenues; a larger base for quay rentals.
Turnover (Aligned)	0,00 %	0,07 %	Revenues from small fishing vessel docks – newly aligned (CCA)
CapEx eligible share	57,58 %	86,09 %	Reconstruction of quays No. 21–23A and acquisition of a waste collection vesse
CapEx aligned share	9,40 %	33,07 %	New projects with documented evidence of taxonomy alignment
OpEx aligned share	0,17 %	1,40 %	More accurate cost attribution according to the narrow OpEx definition.

The diagram below presents a comparison of all three financial indicators – turnover, CapEx, and OpEx – between 2024 and 2025 according to taxonomy categories.

Comparison of taxonomy indicators: 2024 and 2025



The most significant change was recorded in the CapEx area: the share of taxonomy-eligible investments increased from 57.58% (EUR 24.90 million) to 86.09% (EUR 68.20 million), while the share of aligned investments rose from 9.40% to 33.07%. The non-taxonomy-aligned share decreased from 42.1% to 13.9%. These changes were driven by the reconstruction of quays No. 21–23A and the acquisition of a waste collection vessel with an electric power plant, which already have clearly documented evidence of taxonomy alignment. The ratio of revenue eligible for turnover remains stable (10.44% in 2024, 11.10% in 2025), while the share of eligible revenue appeared for the first time in 2025 (0.07%)—due to the classification of revenue from small fishing vessel berths according to the CCA objective. The share of OpEx eligible activities increased from 0.17% to 1.40%, reflecting a more accurate association of costs with eligible activities according to the narrow OpEx definition.

Activities that were present in 2024 but are no longer applicable or do not have financial costs in 2025:

Taxonomy-aligned \activity name	Taxonomy Code	Relevant Port Authority activities	Remark
Micromobility infrastructure, bicycle transportation logistics	CCM 6.13	Reconstruction of a section of Perkėlos Street in Klaipėda (construction of a	The project was completed in 2023 and thus had no financial costs in 2024. In 2025, this activity is no longer on list of taxonomy-aligned activities.
Infrastructure that enables water transport with low CO_2 emissions	CCM/CCA 6.16	Electric charging station for Port Authority vessels, located at the quay on Marių Street	n 2023, the charging station infrastructure was completed. In 2025, this activity was integrated into a broader OPS (onshore power supply) infrastructure development programme.
Water transport infrastructure	CCM/CCA 6.16	Reconstruction of breakwaters (jetties) and implementation of environmental measures	A significant multi-year project (2023 – EUR 31,32 million, 2024 m. – EUR 5,70 million CapEx) was completed. In 2025, no capital expenditures related to this activity were recorded.
Construction of new buildings	CCM 7.1	Construction of the fleet base building	Investments in the construction of the fleet base building in 2024 were taxonomy-aligned but did not meet the criteria (energy class requirements). In 2025, the financial costs of this activity were no longer be identified separately – they were integrated into the overall assessment of the building portfolio.

Key taxonomy-aligned activity conclusions reached in 2024

The 2024 report identified three activities that met both the substantial contribution and Do No Significant Harm (DNSH) criteria under the climate change mitigation objective:

- **6.10 activity** – waste collection vessel with electric power plant and hydrogen fuel cell (zero CO_2 emissions). In 2025, this activity is continued – the vessel has been ordered and its acquisition investments constitute a significant part of the 2025 CapEx (EUR 5,967.63 thousand, classified as a transition activity).
- **6.15 activity** – installation of electric vehicle charging stations. In 2025, this activity was continued, supplemented by the expansion of the hydrogen refueling station infrastructure.
- **6.16 activity**– repair and reconstruction of quays No. 77 and 78 (Smiltynė ferry). In 2025, the main investment object corresponding to activity 6.16 is the reconstruction of quays No. 21–23A (expansion of the cruise ship terminal), which replaces the dominant objects of 2024.

New taxonomy-aligned activities identified for the first time in 2025

Following a more detailed review of the company's activities and investment projects in 2025, the following categories were included in the list of taxonomy-aligned activities for the first time:

Taxonomy-aligned activity name	Taxonomy Code	Relevant Port Authority activities	Reason for inclusion
Electricity transmission and distribution	CCM 4.9	Preparatory works for the reconstruction of 110 kV overhead power lines in the port area	New investment related to the port electrification programme and OPS infrastructure development. In previous years, expenses in this category were not identified.
Installation of renewable energy technology	CCM 7.6	Installation of a solar photovoltaic power plant (30 kW) on the roof of the fleet base building.	A new renewable energy production initiative, included in the taxonomy-aligned accounting for the first time.
Data-driven solutions for reducing GHG emissions.	CCM 8.2	Creation of digital calculator for monitoring and managing transport GHG emissions.	A new digital decarbonization tool that meets the activity criteria of the Climate Delegated Act 8.2.

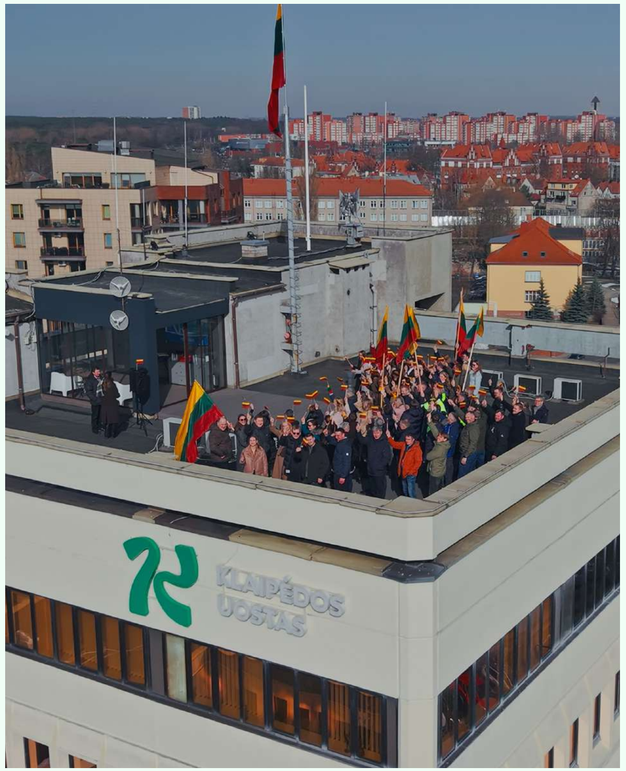
Social information

Own workforce: working conditions 71

Affected communities: friendly relations with the local community 85

Own workforce: working conditions

Working conditions at the Port Authority are one of the essential factors that directly affect employee well-being, motivation, and long-term organizational performance results. As a way of showing appreciation to its employees, the Port Authority ensures stable and respectful working conditions so that all employees feel valued and motivated. This is a strategic investment in the long-term value of the organization, as only engaged, satisfied, and proactive employees strive for the highest performance results and remain competitive.



Disclosure Requirements List

IRO-2

List of significant information disclosure requirements		Reference
SBM-2	Interests and views of stakeholders	73, 86
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business	73
S1-1	Policies related to own workforce	74
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	75
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	75
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	77
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	79
S1-6	Characteristics of the company's salaried employees	80
S1-8	Collective agreement coverage and social dialogue	81
S1-9	Diversity metrics	82
S1-10	Fair remuneration	82, 84
S1-11	Social protection	82
S1-12	Disabled individuals	80
S1-13	Training and skills development metrics	82
S1-14	Health and safety metrics	83
S1-15	Work-life balance metrics	84
S1-16	Compensation indicators (pay gap and total compensation)	84
S1-17	Incidents, complaints, and material impact on human rights.	85

SBM-2

All information is disclosed in the section “2 ESRS SBM-2 Stakeholder interests and opinions”.

Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3

The business model of the Port Authority is based on the management of port infrastructure, pilotage, vessel traffic management, waterway maintenance, and the provision of related services. The execution of these activities requires qualified, motivated employees working in a safe environment, especially those in positions subject to specific technical and safety requirements (divers, maritime workers, pilots, etc.). The results of the double materiality assessment confirmed that the management of the in-house workforce is a significant social issue directly related to the strategic goals of the Port Authority – ensuring operational continuity, high service quality, and sustainable organizational development.

The management of the in-house workforce is reflected in the Port Authority’s strategy through several priority directions: ensuring a safe and health-friendly working environment, continuous strengthening of employee competencies, creating an inclusive organizational culture, and maintaining the employer’s reputation in a competitive labor market. These priorities are inseparable from the Port Authority’s ability to attract and retain highly qualified specialists, ensure operational safety, and meet the growing demands for sustainability accountability.

A significant negative impact has been identified in the area of social dialogue – currently, the dialogue between branches is limited, there is a lack of internal communication, which may reduce employee satisfaction and emotional well-being. In the area of health and safety, a significant negative impact has also been identified: it manifests in specific working conditions in certain positions and the tension caused by structural organizational changes, negatively affecting employees’ psychological well-being.
Possible negative impacts include the risk of health and safety incidents in specific positions (divers, maritime workers), as well as the limited gender diversity in certain professions (e.g., among pilots) due to structural labor market factors. From a financial materiality perspective, the risk of labor shortages has been identified, which may threaten operational continuity due to insufficient replaceability of key positions.

A significant strategic opportunity is the positive employer reputation of the Port Authority, which creates favorable conditions for attracting and retaining highly qualified employees who directly contribute to the creation of organizational value and the quality of long-term operations.

Material impacts are observed across all employee groups of the Port Authority, but special attention is given to positions associated with increased professional risk (maritime workers, divers, pilots) and positions where limited gender diversity is observed due to specific professional traditions and labor market structure. The identified impacts, risks, and opportunities (IRO) in the area of own workforce are presented in the table below.

Topic	Sub-topic	Material impacts	Description	Location in the value chain
S1 Own workforce	**Social dialogue, existence of labor councils, employee information, consultation rights, and participation rights**	Actual negative impact	Insufficient dialogue (between branches) and gaps in internal communication lead to emotional loss for employees and lower satisfaction with the work environment.	Direct activity
		Actual negative impact	The company has a OSH committee, employee trade union, Brotherhood of Pilots, and collective agreements ensuring better working conditions and a stronger voice for employees.	
	Work-life balance	Actual positive impact	Additional holidays, flexible start and end times, the possibility of remote work, a children's room, a gym, and other infrastructure facilities positively affect employee well-being and motivation.	
	Health and safety	Potential negative impact	Divers and maritime workers personnel face a higher occupational risk – potential falls, fractures, or other incidents.	
		Actual positive impact	Employees are provided with additional benefits: health and accident insurance, as well as educational activities aimed at promoting emotional well-being. With funds from supplementary health insurance, employees can cover psychological counseling, dental care, optometry, and other healthcare services.	
		Actual negative impact	The specifics of working conditions and structural organizational changes negatively impact employees' psychological well-being.	
	Work-life balance	Actual positive impact	Additional vacation, flexible start and end times, remote work options, a children's room, a gym, and other infrastructure facilities have a positive impact on employee well-being and motivation.	
	Gender equality and equal pay for work of equal value	Risk	Insufficient assurance of gender equality in top management may lead to reputational consequences.	
	Diversity	Potential negative impact	In certain professions (e.g., pilots), one gender dominates due to long-standing professional traditions, stereotypes, and a limited supply of candidates in the labor market.	
	Training and skills development	Actual positive impact	Significant funds are allocated for training, upskilling, partial funding of studies, and educational leave; special attention is given to artificial intelligence, computer literacy, and leadership skills.	
	Employer reputation	Opportunity	The positive image of the Klaipėda Port Authority as an employer in the labor market creates favorable conditions for attracting and retaining highly qualified employees who contribute to the organization's value creation.	
	Labor force shortage	Risk	Insufficient replaceability and coverage of key position employees may affect operational continuity and the execution of critical functions.	

Policies and commitments related to the workforce

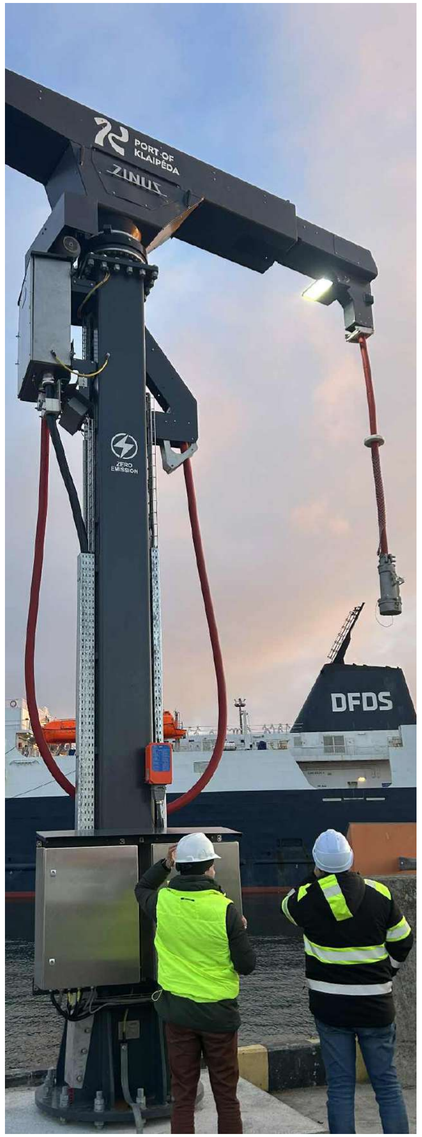
S1-1

The Port Authority manages material impacts, risks, and opportunities (IRO) related to its workforce through a system of approved policies, codes, and internal regulations. These policies encompass material topics identified during the double materiality assessment – employee health and safety, equal opportunities, skills development, social dialogue, work-life balance, and employer reputation – and apply to all salaried employees, regardless of their position or nature of work.

These policies aim to ensure fair and respectful treatment of employees and to promote an inclusive work culture where every employee feels safe, respected, and valued. The protection of human rights is ensured by implementing international and Republic of Lithuania legal regulations, the requirements of internal legal acts prepared by the Port Authority, as well as adhering to the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work standards.

The Port Authority does not have separate policies specifically addressing human trafficking, forced or compulsory labor, or child labor issues, as these matters are regulated by the laws of the Republic of Lithuania and by the international norms binding on the Port Authority. The main policies and implementation procedures governing the Port Authority's IRO in the area of own workforce are presented in the table below.

Name	Description	Application
Employee Safety Policy (approved by decision ST 2024-12-13; publicly available)	It establishes the fundamental principles of employee safety and health culture, encompassing the assurance of a safe working environment, accident prevention, and risk management. Particular attention is given to positions with increased occupational risk, which are subject to additional safety requirements.	All employees
Compensation Policy (approved on 13/12/2024, STP-18; publicly available)	It regulates the allocation of wages and bonuses based on employee competencies and functions performed, ensuring transparent, equal, and fair compensation conditions for all employees	All employees
Equal Opportunities Policy (Order of the general director dated 22/01/2018 No. V-17; not publicly available)	It ensures equal opportunities and non-discrimination for all current employees and candidates, regardless of gender, race, ethnicity, age, disability, or other personal characteristics. It also provides for positive actions to increase diversity and ensure inclusion, including special measures for persons with disabilities (workplace adaptations, assistance during recruitment). An anonymous complaint submission mechanism is in place. The responsible person is the head of the Human Resources Department.	All employees and candidates
Policy Against Violence and Intimidation at Work (Order of the Director General dated 04/03/2022 No. V-73, reviewed on 08/03/2024; not publicly available)	It aims to create a safe working environment that protects employee dignity, fostering collaboration, openness, and trust. It also establishes preventive measures and an action plan for cases of psychological abuse, bullying, and harassment. The responsible person is the Occupational safety and health specialist.	All employees
Employee Code of Conduct (Approved by SB Decision No. KT-2025-10 dated January 23, 2025; publicly available)	It establishes ethical and behavioral standards based on the principles of justice, fairness, and respect. It also requires employees to communicate equally and respectfully with all individuals, to use work time effectively and ethically, and to adhere to the organization's values.	All employees
Business Partner Code of Conduct (publicly available)	It establishes behavioral standards applicable to the Port Authority's business partners and contractors, encompassing environmental, social responsibility, and governance principles. It also ensures responsible and ethical collaboration throughout the value chain.	Business partners and contractors
Sustainability Policy (approved on 20/03/2025; publicly available)	It covers social commitments to employee welfare, the creation of an inclusive and ethical organizational culture, and adherence to responsible employer principles. It also establishes sustainability management directions related to the	All employees



Processes for engaging with own workforce and workers' representatives about impacts

S1-2

During the analysis of the Company's operations, the following significant employee engagement processes were identified:

- **Employee Satisfaction Surveys and Microclimate Analysis**
  The Port Authority organizes employee surveys once a year to assess satisfaction with working conditions, the reward system, and the overall microclimate of the organization. Based on the survey results, action plans are developed aimed at addressing identified issues and improving the work environment.
- **Occupational Safety and Health Committee**
  The Occupational Safety and Health Committee consults with employees on working conditions and safety measures, participates in the organization, control, and plans processes for improvements. The committee provides recommendations for improving the work environment and monitors the implementation of decisions made.
- **Commission for Investigating Accidents**
  The company has a commission that investigates accidents, including representatives from both the employer and employees. The commission ensures an objective and comprehensive assessment of incidents and the application of preventive measures.
- **Trade unions**
  The company has the Port Authority employees' trade union and the Brotherhood of Klaipėda Pilots, representing employees' interests and participating in dialogue with the employer.
- **General Inclusion Mechanisms**
  Once a week, employees receive a company newsletter with relevant company information, and twice a year, employee meetings are held where Director General presents the company's performance results, completed projects, and planned goals. During the meetings, topics relevant to employees are discussed, and information is shared. Meetings to discuss activities are convened as needed. An "Ideas bank" operates within the company, where employees are encouraged to submit their ideas, suggestions, and observations via email idejos@port.lt or on the online platform "Trello". The Director General's advisor is responsible for collecting ideas and forwarding them to management.

Processes to remediate negative impacts and channels for own workforce to raise concerns

S1-3

The Port Authority ensures that all employees have the opportunity to express concerns safely, confidentially, and without fear of retaliation, report potential violations, or negative impacts on working conditions. To this end, several complementary channels and mechanisms have been implemented.

Channels for Reporting

Employees can submit requests, complaints, and reports – including anonymous ones – through regulated reporting channels. The procedure for registering and reviewing reports is defined in Order No. V-254 approved by the Director General on 17/10/2025. Whistleblower protection is ensured in accordance with the procedure for providing information under the Law on the Protection of Whistleblowers of the Republic of Lithuania (Order of the Director General No. V-152 with amendments, dated 06/09/2021). Employees can also contact their direct supervisor and those responsible for personnel management directly. Reports of potential violations can be submitted through the following channels:

- by email: pranesimas@port.lt;
- by leaving a message on the answering machine: tel. +370 46 499 653;
- directly to the anti-corruption officer;
- directly to the chairperson of the Port Authority's Supervisory Board Audit and Risk Committee via email: SeaportofKlaipeda@gmail.com

Ideas Bank

The Port Authority has an “Ideas Bank” – a platform for employees where they are encouraged to submit ideas, suggestions, and observations via email idejos@port.lt or on the online platform. In 2025, ideas were collected via the “Trello” platform, and starting in 2026, the “Ideas Bank” was moved to the company’s intranet . The Director General’s advisor is responsible for collecting ideas and forwarding them to management. This tool allows employees to express observations related to working conditions, processes, or organizational culture in an informal environment.

Commission for Investigating Accidents

The company has a commission that investigates workplace accidents, including representatives from both the employer and employees. The commission ensures an objective and comprehensive assessment of incidents and the implementation of preventive measures to avoid recurring cases and improve workplace safety.

Occupational Safety and Health Committee

The OSH committee, composed of an equal number of employer and employee representatives, consults with employees regarding working conditions and safety measures, their organization, control, and improvement planning. The committee provides recommendations for improving the work environment and monitors the implementation of decisions made, thus providing employees with a structured opportunity to raise safety-related issues.

Trade unionsTrade unions

The trade unions operating in the Port Authority – the trade union of employees of the Klaipėda State Seaport Authority and the Brotherhood of Klaipėda Pilots – create an additional channel through which employees can collectively express concerns and initiate issue resolution with the employer.

Mechanisms for Preventing Violence and Discrimination

Employees experiencing psychological violence, harassment, discrimination, or violations of equal opportunities can file complaints based on the procedures approved by the company, which provide for an anonymous complaint submission mechanism in cases of discrimination:

- **Description of Policies and Preventive Measures Aimed at Combating Violence and Intimidation in the Workplace** (Order No. V-73 of the Director General, dated March 4, 2022, revised on March 8, 2024) – responsible person – occupational safety and health specialist.

- **Equal Opportunities Policy** (Order No. V-17) – responsible Person – the employee responsible for personnel management. An employee wishing to report discrimination or a violation of equal opportunities can contact their branch head or the employee responsible for personnel management and indicate the person who may be violating their rights. The company guarantees the confidentiality of every report submitted. If necessary, employees have the option of reporting violations of equal opportunity, including anonymously.

Annual Engagement Survey

Once a year, an employee satisfaction and microclimate survey is conducted to systematically identify employee concerns regarding working conditions, the reward system, and the overall organizational climate. Based on the survey results, action plans are developed aimed at addressing specific issues, and their implementation is monitored at the management level.

Ensuring the effectiveness of channels

The anti-corruption compliance officer collects, organizes, and analyzes reports received through the reporting channels and their examination results, and prepares a report at the end of each year. The effectiveness of the channels is also evaluated during the annual microclimate survey, and the results obtained are used to improve existing engagement and reporting processes.

Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

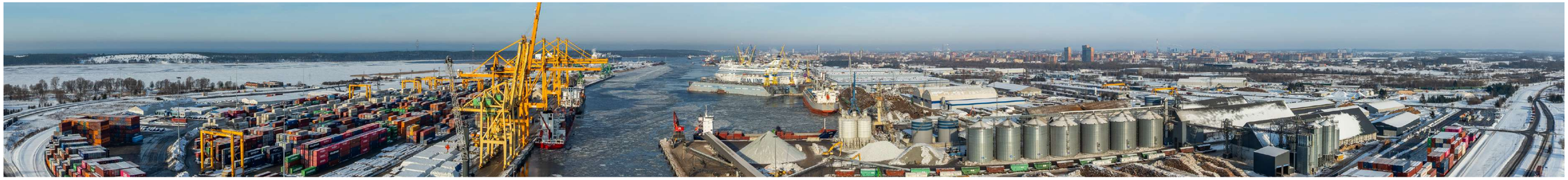
S1-4

The Port Authority systematically implements measures aimed at managing material impacts on its workforce, reducing associated risks, and realizing identified opportunities. Actions include improving working conditions, enhancing employee well-being, developing competencies, ensuring a safe working environment, and fostering an inclusive organizational culture.

Taking into account the specific nature of the Port Authority's operations and the positions that entail an increased likelihood of occupational risk (the list of positions was approved by Order No. V-243 of the Director General on November 13, 2023 "List of Positions of Employees of the Joint Stock Company Klaipėda State Seaport Authority Working in Conditions of Tolerable Occupational Risk"), effective management of working conditions and ensuring employee well-being are considered key priorities for the organization. The results of the Port Authority's activities are directly related to the physical and emotional well-being of employees; therefore, investments in a safe working environment are viewed as strategically necessary rather than merely a compliance requirement.

The main measures being implemented in 2025 and their results are presented in the table below:

Measure	Responsible	Period and scope	Implementation Status in 2025
1. Promoting employee engagement			
1.1. Development of an employee compensation policy, units	Organizational Development Director	2025 – 1 unit	Completed – The Compensation Policy was approved on December 13, 2024 (STP-18).
1.2. Conducting an employee satisfaction survey, units	Organizational Development Director	Once a year.	Completed – in 2025, the study was conducted with a participation rate of 91% (196 employees), overall rating 92/100.
1.3. Creation of a continuous learning environment, focusing on sustainability, innovation, and leadership competency development; number of employees	Organizational Development Director	At least 10 employees per year.	In progress – in 2025, ≥10 employees participated in activities for developing sustainability, innovation, and leadership competencies. 52 employees participated in the "Organizational Performance Excellence".
1.4. Attracting and retaining talent; the Port Authority is implementing recruitment initiatives, units	Head of Communications and Marketing Unit	At least one initiative per year.	A talent attraction initiative was implemented – an international port technology hackathon "Portathon 2025" was held, aimed at innovations in the maritime sector and solutions to global challenges.
2. Ensuring security			
2.1. Vessel accidents and safety incidents on land within the port area units	Harbour Master	0 accidents per year.	Completed – in 2025, 0 accidents were recorded.
2.2. Number of workplace accidents, units	Occupational safety and health specialist.	0 workplace accidents per year.	Completed – in 2025, 0 workplace accidents were recorded.
2.3. Occupational safety and health training, number of hours	Occupational safety and health specialist.	2025 – 2,500 hours	Completed – in 2025, 2,844 hours were allocated for occupational safety and health training, exceeding the planned amount.



Evaluation of the effectiveness of measures

To systematically and objectively assess employee experience and monitor the effectiveness of implemented measures, the Port Authority organizes an annual employee engagement and organizational microclimate survey. In the 2025 survey, 91% of employees (196 individuals) participated, while the participation rate in 2024 was 85% (185 individuals). The increasing response rate is regarded as a positive indicator of organizational trust and employee engagement.

In 2025, the overall employee satisfaction and engagement rating reached 92 points out of 100, which is 4 points higher than the previous assessment result. The obtained rating significantly exceeds both the average of Lithuanian companies (69 points) and the global average (54 points). These results confirm the positive impact of the Port Authority's management practices on working conditions and employee well-being. The study evaluated four main dimensions:

- *Engagement culture (83/100 points).* The indicator reflects the maturity of the organizational culture, expressed through respect for employees, their motivation, and the conditions created for accepting professional challenges. Although the result indicates a positive change, it also identifies areas for improvement in strengthening employee engagement, which will be addressed with targeted measures.
- *Strategic alignment (94/100 points).* The result reveals successful communication of the strategic direction. Employees have a good understanding of the Port Authority's strategic goals, recognize their role in achieving them, and clearly see the connection between their personal contributions and the organization's overall objectives.
- *Motivation and relationships (94/100 points).* The indicator reveals strong leadership ability to motivate employees, nurture interpersonal relationships, and create a cohesive team. The high score confirms existing trust in management and an overall positive organizational atmosphere. This conclusion is further supported by customer satisfaction survey (NPS) data: surveyed vessel masters rated the competence of pilots at 9.7 out of 10, and the pilots' equipment at 9.6, indicating a direct link between employee professionalism and the quality of clients experience.
- *Implementation (98/100 points).* The highest score shows that the Port Authority's leaders clearly define goals, ensure employee accountability for commitments made, and systematically pursue tangible performance results. This indicates an effectively functioning leadership and organizational process, which is directly reflected in client evaluations: In the NPS survey, vessel masters rated the port services aspects an average of 9.4 points, and the quality of vessel traffic service at 9.5 points out of 10.

Additionally, an employee net promoter score (eNPS) showed that in 2025, this indicator reached +25, confirming that employees are inclined to recommend the Company as an employer. The distribution of responses captures an increasing share of engaged employees and a decreasing number of disengaged employees compared to previous periods.

Identified areas for improvement and planned actions

The analysis of open-ended questions identified the main areas for improvement cited by employees: internal communication, clarity of processes and organizational structure, leadership style, compensation policy, and more flexible work organization solutions. The Port Authority responds to the identified areas with targeted organizational measures, including strengthening communication channels, reviewing processes, evaluating compensation policies, and conducting strategic management sessions.

Link to performance results

It is noteworthy that high employee engagement has a direct impact on the quality of services provided. The customer satisfaction survey conducted in 2025, based on the net promoter score (NPS) methodology, showed that the overall NPS index of the Port Authority reached 75%, significantly exceeding the target threshold set in the strategic plan for 2025 (≥ 55%). The overall NPS indicator has consistently increased from 48% (in 2019) to 75% (in 2025), which substantiates the long-term value of improving organizational culture and working conditions and confirms that investments in employee well-being directly contribute to higher service quality and stronger client loyalty.

Monitoring and implementation mechanisms

The effectiveness of measures is evaluated through an annual employee engagement and microclimate survey, allowing for continuous monitoring of the impact of implemented measures on employee well-being and timely identification of areas requiring additional actions. To ensure the effectiveness of the strategy, the Audit and Risk Committee (ARC) discussed sustainability progress and addressed relevant issues at each monthly meeting in 2025, ensuring consistent implementation of tasks. Starting from 2026, the review of sustainability progress at ARC meetings is planned to occur at least once a quarter, with relevant topics and decisions discussed more frequently as needed – within the division and coordinated with the Director General through the head of the Sustainability and Environmental Protection Division.

In summary, the results obtained in 2025 confirm the consistently positive impact of the Port Authority's management practices on working conditions, the reduction of organizational risks related to employee satisfaction and engagement, and the creation of conditions for long-term organizational value and operational sustainability.

Sustainability strategy, goals, actions, and tasks related to own workforce

S1-5

In the Port Authority, social aspects are an integral part of the sustainability strategy, closely related to the internal organizational culture and employees. To ensure long-term social responsibility, the Port Authority has set a strategic goal – to become an empowering organization that promotes employee professional growth, engagement, and well-being. The strategic task is to have employees who have realized their potential.

It encompasses measures aimed at increasing employee satisfaction, promoting engagement, and developing professional skills. The goal will be measured by a quantitative outcome: the employee engagement rate is to be gradually increased to 70 percent (by 2035), and the growth in value added per employee is to reach at least 15 percent.

To achieve this objective, the following specific measures are planned for the period of 2026 to 2029:

- **Encouraging Employee Engagement:** an annual employee survey is conducted using the eNPS methodology (1 instance per year), allowing for systematic monitoring of employee satisfaction dynamics and timely identification of areas for improvement.
- **Creating a Continuous Learning Environment:** at least 10 employees are included annually in targeted programmes to develop sustainability, innovation, and leadership competencies, fostering a culture in which learning becomes a daily activity.
- **Attracting Talent and Shaping Employer Branding:** at least 1 talent attraction initiative is conducted each year to position the Port Authority as an attractive employer in the region.
- **Ensuring a Safe Working Environment:** the goal is to achieve zero vessel accidents and safety-related incidents on port land, zero workplace accidents; consistent health and safety training (2026 – 300 hours, 2027 – 160 hours, 2028 – 1,700 hours, 2029 – 300 hours).

The strategic goals of the Port Authority are formed based on a four-level process, which ensures that employees are directly involved in shaping strategic objectives:

- **Shareholder Expectations:** strategic goals are shaped by the shareholder, who provides a letter of expectations outlining the long-term priorities for the company's operations;
- **Legal Regulation:** The essential functions and purpose of the Port Authority are enshrined in the Law on the Klaipėda State Seaport, and their implementation requires the careful integration of these objectives into the company's strategy;
- **Role of Governance Bodies:** The Supervisory Board and the Board actively participate in the process of forming strategic goals, taking into account current market, sector, and geopolitical trends;
- **Employee Engagement:** during annual strategic sessions, top and middle management, along with some non-managerial employees, shape the guidelines for the company's strategic goals and objectives. Based on these guidelines, a four-year Strategic Action Plan is prepared, which is coordinated with all company divisions. Only after aligning them with the organization's internal structure are the strategic goals and objectives officially incorporated into the operational strategy.

Progress in sustainability within the workforce is regularly monitored by the Audit and Risk Committee (ARC) – sustainability topics are discussed at each meeting, ensuring consistent progress and effective implementation of decisions made.

Characteristics of the company's salaried employees

S1-6

Employees of the Port Authority work under employment contracts – both indefinite and fixed-term, ensuring an appropriate number of working hours. In 2025, 2024, and 2023, the total number of employees was 225, 225, and 222 respectively, including those on pregnancy, childbirth, and parental leave. In 2023 and 2024, the company employed 1 person with a disability, and at the end of the reporting period in 2025, there was also 1 person with a disability employed (3 persons with disabilities were salaried during the year) (S1-12). Statistical data were calculated as the total number of employees at the end of the period and correspond to the data indicated in the management report.

The employee turnover rate of the company includes employees who voluntarily left the company and those who were dismissed, calculated as the proportion of employees who voluntarily left or were dismissed during the reporting period, including dismissals due to illness, death, reaching retirement age, or the expiration of a fixed-term employment contract, relative to all employees. In 2025, 33 employees left the company, accounting for 14.6% of all employees, in 2024 – 14 employees (6.3%), and in 2023 – 21 employees (9.4%).

It is noteworthy that the Sustainability Report for 2025 additionally discloses the voluntary turnover rate, which includes all employees who have left the company voluntarily and which reached 7.11%. This rate allows for a more accurate assessment of employee departures on their own initiative and a better understanding of employee retention and organizational attractiveness aspects.
Statistical data shows that despite the increased turnover in 2025, the Port Authority's team remains stable, and the employee structure by key demographic indicators essentially does not change.

Indicator	2025	2024	2023
Total number of permanent salaried employees	225	225	222
Women	59	62	59
Women on maternity leave	2	4	5
Men	164	159	158
Total number of salaried employees who left the company	33	14	21
Overall turnover rate, %	14,6%	6,3%	9,4%
Voluntary turnover (number of employees who left at their own initiative)	16	not disclosed	not disclosed
Voluntary turnover rate, %	7,11%	not disclosed	not disclosed
Total number of salaried employees with disabilities	1*	1	1
Hired employees: up to 30 years	5	3	3
Hired employees: 30 - 50 years	107	107	111
Hired employees: 50 years and older	113	115	108

*During the reporting period of 2025, a total of 3 individuals with disabilities were employed, but by the end of the year, 1 remained

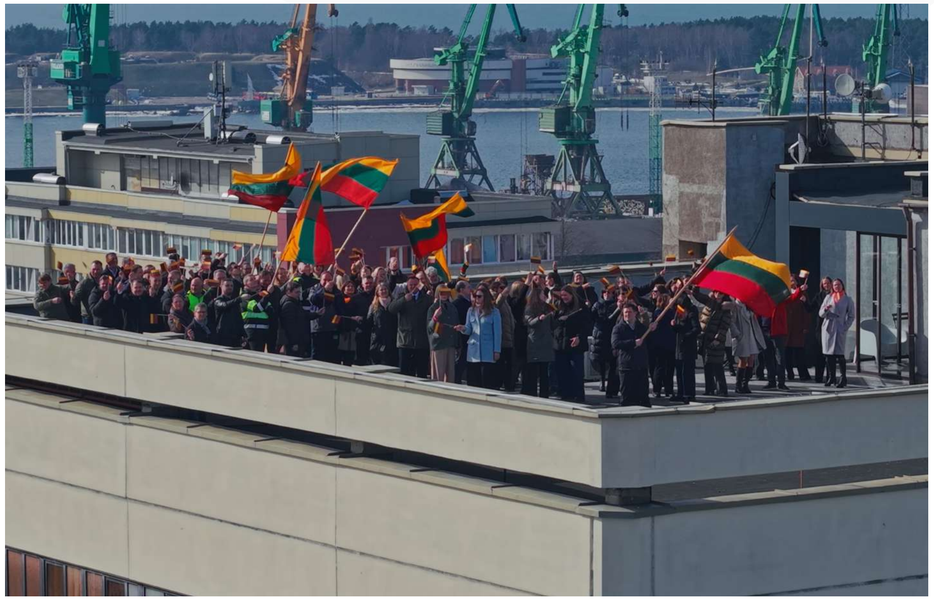
Calculation guidelines

The indicators are calculated based on the company's personnel management data, using the number of employees at the end of the reporting period. The total number of employees includes all salaried employees, including those on pregnancy, childbirth, and parental leave.

The overall employee turnover rate is calculated as the proportion of employees who left the company during the reporting period (including those who left voluntarily and those who were dismissed) to the total number of employees.

The voluntary turnover rate is calculated as the proportion of employees who left the company on their own initiative to the total number of employees.

The distribution of employees by gender, age, and other demographic indicators is determined based on the actual employee composition at the end of the reporting period.



Collective agreement coverage and social dialogue

S1-8

Employee working conditions are regulated by individual employment contracts. The collective agreement, effective as of January 1, 2023, provides for more favorable working, social, and economic conditions and guarantees for employees than those required by the laws of the Republic of Lithuania. The company ensures fair and non-discriminatory working conditions for all employees, adhering to the requirements of the Labor Code of the Republic of Lithuania and other applicable legal acts.

The Port Authority has a structure for employee representation and social dialogue, which includes the Occupational Safety and Health (OSH) committee, the trade union of employees of the Klaipėda State Seaport Authority, and the Brotherhood of Klaipėda Pilots. The OSH committee systematically analyzes issues related to employee safety and health, examines accidents and their causes, plans preventive measures, and ensures the continuous improvement of working conditions.

Employee representatives actively participate in decision-making and contribute to the protection of employee rights, ensuring safe working conditions and organizing constructive social dialogue within the organization. These functions are performed by a total of 14 employee representatives:

- Occupational Safety and Health (OSH) committee – 2 representatives;
- Trade union of employees – 9 representatives;
- Brotherhood of Klaipėda Pilots – 3 representatives.

The total number of employee representatives in the Port Authority is 14 (out of 225 employees), constituting 6.22% of all employees.

Employees of the Port Authority also actively participate in the activities of international organizations, including:

- Baltic Ports Organization (BPO) – 4 representatives;
- European Sea Ports Organization (ESPO) – 12 representatives;
- European Cruise Association (CE) – 1 representative;
- International Association “Baltic Cruises” – 1 representative;
- Hamburg Port Marketing Association (HM) – 2 representatives;
- Wind Energy Association (WEA) – 2 representatives.

The total number of employee representatives in international organizations is 13 (out of 225 employees), constituting 5.78% of all employees. The company employs 4 employees who represent the company in two or more international organizations.

Social dialogue in the Port Authority is based on constructive cooperation between management, employee representatives, and other stakeholders. It contributes to employee engagement, improving working conditions, and the efficiency of the organization’s operations, thereby ensuring sustainable and responsible organizational development.

Additional employee welfare measures

The Port Authority systematically cares for the physical, emotional, and social well-being of employees by implementing various additional benefits and initiatives that contribute to employee satisfaction, engagement, and the balance between work and personal life.

Additional leave and flexibility in working conditions:

- additional paid leave is granted for marriage, loss of a loved one, education, or other cases specified in the collective agreement;
- longer paid leave durations than those stipulated in the Labor Code of the Republic of Lithuania are applied;
- bonuses for leave are allocated;
- opportunities are created to balance work and personal life, with remote work and flexible working hours applied as needed.

Financial and social benefits for employees:

- payments to employees in cases of significant life events (birth of a child, marriage, anniversaries, accidents, or loss of loved ones);
- health and accident insurance;
- onboarding and exit packages, annual holiday bonuses.

Work environment and community:

- spaces dedicated to employee well-being are established (rest areas, common spaces, infrastructure for employee needs);
- various events are organized for employees and their family members (e.g., Christmas events, educational activities, summer initiatives, excursions);
- community is encouraged through cultural, sports, and social activities as well as participation in public events;
- internal initiatives aimed at improving employee engagement and communication are implemented.

Education, training, and engagement:

- studies are partially reimbursed and educational leave is provided;
- trainings and meetings with specialists from various fields are organized, taking into account current topics and employee needs;
- employee engagement in volunteer activities and social initiatives (e.g., support campaigns, environmental management initiatives, community activities) is encouraged;
- educational activities are carried out, and collaboration with educational institutions, as well as mentorship and internship programmes, is promoted.

Top management diversity

S1-9

Indicator	2025	2024	2023
Total number of members of the administration, management, and supervisory bodies	11	11	10
Hired employees: women	1	1	0
Hired employees: men	4	4	4
Hired employees: under 30 years old	0	0	1
Hired employees: from 30 to 50 years old	1	1	3
Hired employees: over 50 years old	4	4	1

Remuneration

S1-10

The company's approved wage policy includes the allocation of wages and bonuses based on competencies and functions performed. All salaried employees are paid a fair wage that corresponds to applicable comparative indices.

Social protection

S1-11

All employees are provided with social protection against loss of income due to major life events: sickness, unemployment (starting while the employee is working at the company), occupational accidents and acquired disabilities, parental leave, and retirement.

Additionally, the company enhances employees' social protection by implementing supplementary measures, including health and accident insurance, as well as financial benefits for employees in significant life events (e.g., childbirth, marriage, loss of loved ones, or experiencing a disaster).

These measures complement the guarantees provided by legislation and contribute to ensuring employees' financial security, well-being, and social stability.

Skills development, health, safety, and working conditions

S1-13

The Port Authority consistently invests in employees' professional development to ensure continuous opportunities for skill enhancement, strengthening competencies, and adapting to the changing operational environment. The Port of Klaipėda operates in a dynamic and technologically advanced environment, therefore, the organization continuously implements new solutions, improves processes, and strengthens employee competencies.

All employees participate in regular reviews of performance results and career development, which take place during annual discussions. During these discussions, achieved results are reviewed, development goals are set, and wages are evaluated.

The company allocates significant investments for employee training and skill enhancement, organizes various training sessions, participation in seminars, conferences, and other professional development activities. Employee initiative to study is also encouraged – the company partially finances studies and provides paid educational leave.

Occupational health and safety is a priority area. The company has an occupational safety and health (OSH) system that includes regular training, instruction, and occupational risk assessment. Targeted measures are implemented for accident prevention, incident causes are analyzed, and working conditions are continuously improved.

Improving working conditions also includes organizational initiatives aimed at employee engagement and well-being, such as strengthening internal communication, improving processes, and involving employees in decision-making to create a motivating and inclusive work environment.

Health and safety metrics

S1-14

Occupational health and safety are ensured in accordance with the provisions of the Labor Code of the Republic of Lithuania, employee safety and health regulations, and other legal acts governing labor relations. Additionally, internal regulations prepared by the Port Authority are implemented, which are available in the document management system “Avilys” and the shared system “Saugykla”.

The company has an Occupational Safety and Health Committee that ensures continuous consultation and information for employees on all employee safety and health issues, as well as plans and implements health improvement and accident prevention measures.

When assessing the safety level of the Port Authority’s work, the international TRCF (Total Recordable Case Frequency) indicator is applied, which allows for an objective assessment of the frequency of work-related incidents. A lower TRCF value indicates better work safety practices. In 2023 and 2024, the TRCF indicators were 2.55 and 2.53, respectively, while in 2025, this indicator decreased to 0, indicating that no work-related incidents were recorded during the reporting period.

Recorded cases include work-related incidents in which an employee sustained an injury or health problem that required medical attention, time off work, or other measures. During the period of 2023–2024, one accident was registered per year, while in 2025, no accidents involving company’s own employees, work-related health issues, or lost workdays were recorded.

Throughout the period of 2023–2025, no deaths among company’s own employees of the Port Authority were recorded. However, in 2025, two cases involving other individuals working at the company’s operational sites were recorded: one case occurred within the company’s operational site, and the other during the loading of goods onto the vessel “Regina Seaways”, when a person fell from the main deck into the vessel’s hold. Both cases were properly registered and reported to the responsible authorities.

All employees of the Port Authority are insured with additional health insurance and accident insurance, which is valid 24/7 worldwide (except in high-risk areas).

Indicator	2025	2024	2023
Number of deaths among own workforce due to work-related injuries and work-related health problems	0	0	0
Number of fatalities from work-related injuries and work-related ill-health among non-employees at the company’s sites	2	1	1
Number of registered accidents	0	1	1
TRCF indicator	0	2,53	2,55
Number of registered work-related health issues (salaried employees)	0	0	0
Number of workdays lost by salaried employees, related to work-related injuries and deaths resulting from workplace accidents, work-related health problems, and deaths resulting from health problems	0	0	0
Accident on the way to/from work	0	1	1

Work-life balance metrics

S1-15

All employees of the company have the right to take leave for family reasons, as stipulated in the Labor Code of the Republic of Lithuania and the company's collective agreement. In order to ensure a balance between employees' professional and personal lives, the company implements additional measures that promote employee well-being and ensure gender equality.

The Port Authority creates conditions for employees to balance their professional and personal lives by ensuring flexible work organization, taking into account individual employee needs. If necessary, employees are provided with opportunities to work remotely, and flexible working hours are applied, allowing for a more effective balance between work and personal commitments.

To enhance employee well-being, the company, following the provisions outlined in the collective agreement, implements additional measures, including extra leave, financial benefits for significant life events, and other social benefits. These measures contribute to employees' emotional well-being, reduce work-related stress, and promote long-term employee engagement.

Significant attention is given to employee engagement and organizational culture. The company implements internal communication and engagement initiatives that encourage employee initiative and participation in the improvement of the organization.

Additionally, various social, cultural, and sports activities are organized, which strengthen community spirit and contribute to employee well-being and the balance between work and personal life.

Indicator	2025	2024	2023
Total number of employees who took leave for family reasons (i.e., pregnancy and childbirth, parental leave, and family leave) per year	8	7	6
Women	4	6	4
Men	4	1	1

Fair remuneration

S1-10

The company's approved wage policy includes the allocation of wages and bonuses based on competencies and functions performed. All salaried employees are paid a fair wage that corresponds to applicable comparative indices.

Compensation indicators (pay gap and total compensation)

S1-16

Since 2023, the company has observed a consistent increase in the average monthly total compensation. During the analyzed two-year period (2023–2025), it increased by 21.72%, with an average annual growth rate of about 10.33% (the growth for 2023–2024 was 14.98%, and for 2024–2025 it was 5.86%). A decrease in the gender pay gap is also recorded: during the analyzed period, it decreased by 3.22 percentage points – from 12.97% in 2023 to 9.75% in 2025. The difference still exists due to the different positions held by employees and their nature.

The overall difference between the highest-paid individual and the average annual salary of a salaried employee (excluding the highest earner) is calculated based on ESRS requirements. In 2024, the ratio decreased by 0.27 units (from 3.77 to 3.50), but in 2025 it increased again to 3.85, exceeding the level of 2023.

2025	2024	2023	Indicator
4 340,85	4 100,41	3 566,25	Average monthly salary of salaried employees, EUR
4 013,29	3 703,89	3 211,41	Women, EUR
4 445,14	4 240,02	3 691,16	Men, EUR
2 008	2 001	2 002	Annual working hours norm set by the Government of the Republic of Lithuania
25,94	24,59	21,38	Average hourly wage of salaried employees, EUR
23,98	22,21	19,25	Women, EUR
26,57	25,43	22,12	Men, EUR
9,75	12,66	12,97	Gender pay gap, %
198 062,14	170 385,81	159 561,89	Annual total compensation of the company's highest-paid employee, EUR
51 440,04	48 667,71	42 275,97	Average total annual compensation of salaried workers, excluding the highest salary, EUR
3,85	3,50	3,77	Total compensation ratio (x)
3,85	3,50	3,77	*Total compensation ratio (x)*

The Port Authority calculates compensation based on Order No. DĮ-200 of the Director General of the State Data Agency, dated October 2, 2024, titled “Methodology for the Preparation of Wage Statistics”. This methodology ensures the consistency of calculations and allows for the comparison of wage data with other companies and sectors. Procedure for calculating average wages:

1. average monthly salary: the average monthly salary of all employees is calculated;
2. annual salary: the average monthly wage is multiplied by 12 months to determine the total annual salary;
3. working hours norm: the annual salary is divided by the annual working hours norm established by the legal acts of the Government of the Republic of Lithuania.

S1-17

The company consistently monitors and manages risks related to discrimination and human rights violations in the workplace, ensuring transparent processes and preventive measures. Over the past four years (2022–2025), no incidents or complaints related to workplace discrimination have been recorded, and no fines, penalties, or compensations for damages have been imposed. No case was related to forced labor, human trafficking, or child labor.

The results presented indicate that the company ensures a safe and respectful working environment, consistently adhering to the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and OECD recommendations for multinational enterprises.

Affected communities: friendly relations with the local community

Relationships with surrounding communities are a significant intangible asset that directly impacts the sustainability, social acceptance, and reputational value of the Port Authority’s operations. The activities of the Port of Klaipėda are conducted adjacent to residential areas, thus constructive and consistent dialogue with communities, understanding their expectations, and involving them in decision-making are essential prerequisites for long-term operational continuity.

The Port Authority is committed to seeking solutions that address the diverse needs of communities and stakeholders, actively participating in resolving social issues, and building trust-based relationships. The goal is to successfully conduct operations and be responsible neighbors contributing to community well-being and regional prosperity.

Disclosure Requirements List

IRO-2

List of significant information disclosure requirements		Reference
SBM-2	Interests and views of stakeholders	86
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	86
S3-1	Policy related to affected communities	88
S3-2	Processes for involving affected communities in addressing impact issues	88
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	88
S3-4	Measures taken to address material impacts on affected communities, methods for managing material risks to affected communities and capitalizing on material opportunities, and the effectiveness of those measures	89
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	89

Interests and views of stakeholders

SBM-2

During the double materiality assessment process, affected communities are included – these are local residents and their representatives who are directly or indirectly impacted by the activities of the Port of Klaipėda through noise, dust, infrastructure development, and new project implementation. Local communities and the municipal authorities of Klaipėda city have been identified as one of the key stakeholder groups and actively involved in the double materiality assessment (DMA) process.

Community representatives participated in targeted stakeholder surveys during the assessment. The survey results identified the main concerns of local communities related to air pollution and safety, as well as anticipated new projects – the hydrogen production initiative and southern part development. The insights obtained were consolidated and used not only to identify existing and potential impacts but also to assess their significance. All information collected during the surveys was documented, indicating the rationale for the assessment.

Ongoing dialogue with communities is maintained not only during the DMA – in 2025, 9 meetings were held with representatives of resident communities, during which planned and implemented infrastructure projects were presented, residents' questions were answered, and compromise solutions were sought. Communities directly contribute to the Port Authority's decisions regarding impact management measures – noise reduction, adjustment of contractors' working hours, and the preparation of communication plans.

More detailed information about the processes of community involvement, channels, and impact management measures is provided in sections S3-1 and S3-2.

Material impact, risks, and opportunities related to affected communities

SBM-3

The activities of the Port of Klaipėda are conducted adjacent to residential areas, thus relationships with surrounding communities are an integral part of the Port Authority's operations and a significant factor influencing both reputational value and social license to operate. The results of the double materiality assessment confirmed that the impact on local communities is a significant social issue directly linked to the Port Authority's strategic goals – ensuring long-term operational continuity, responsible infrastructure development, and constructive relationships with local communities. In the Port Authority's strategy, community management is reflected through active social dialogue, transparent communication about planned projects, participation in community initiatives, and targeted impact reduction measures.

The most material actual negative impact is related to the noise and dust generated by port operations, which adversely affects local residents. Although noise limits in residential areas are not exceeded, communities react sensitively to ongoing construction and cargo turnover works, especially at night. Additionally, actual negative impacts have been identified related to new projects – the hydrogen production initiative, the development of the southern part, and the construction of an administrative building – raising public concerns about air quality, noise, and overall changes in quality of life.

At the same time, significant actual positive impacts have been identified – the Port Authority's active participation in community events and support strengthens social ties, contributes to the development of local initiatives, and improves quality of life. Additionally, a potential positive impact on the economy and employment of communities has been identified – due to the activities of the Port Authority and companies operating in the port area, new jobs are potentially being created and regional economic activity is being strengthened.

From a financial materiality perspective, two risks have been identified. First – the negative impact on communities may foster resident dissatisfaction and public resistance to projects, which could lead to temporary project suspensions, deadline extensions, and negative consequences for the Port Authority's reputation. Second – the formation of unfavorable public opinion may create obstacles to the implementation of the hydrogen production project and potentially slow its progress.

Material impacts primarily affect the residents of Klaipėda city living adjacent to the port area – particularly the communities of Vitė, Melnragė, and other nearby neighborhoods. The broader regional community experiences indirect impacts through changes in economic activity and employment. Identified comprehensive identified impacts, risks, and opportunities are presented in the table below.

Topic	Sub-topic	Material impacts	Description	Location in the value chain
S1 Affected communities	**Communities' economic, social and cultural rights**	Actual negative impact	Noise and dust generated by port activities negatively affect local residents.	Direct activity and final chain
		Actual negative impact	New projects (e.g., hydrogen production, development of the southern part, construction of an administrative building) raise public concern and potential negative impacts (on air quality, noise, environmental pollution, and overall quality of life).	Direct activity
		Actual positive impact	The company's participation in community events and the support it provides have a positive impact on residents in the surrounding areas, strengthening social ties, contributing to the development of local initiatives, and improving quality of life.	Direct activity
		Potential positive impact	The activities of the Port Authority and companies operating in the port area can have a positive impact on the local economy and employment – potentially creating new jobs and strengthening regional economic activity.	Direct activity and final chain
		Risk	Noise and dust generated by port activities can lead to dissatisfaction among local residents and public resistance to ongoing projects. This may result in temporary project suspensions, deadline extensions, and negative consequences for the reputation of the Port Authority.	Initial chain and direct activity
		Risk	The formation of unfavorable public opinion may create obstacles to the implementation of the hydrogen production project, pose additional coordination challenges, and potentially slow the project's progress.	Direct activity

Policy related to affected communities

S3-1

The Port Authority manages the impact on local communities in accordance with the Sustainability Policy, approved on March 20, 2025, and publicly available (publicly available). The policy includes commitments to the well-being of local communities, maintaining close dialogue with residents of the Klaipėda region, and contributing to their social and cultural development. These commitments are an integral part of the Port Authority's sustainability strategy and are directly related to material impacts on communities identified during the double materiality assessment. More information is provided in the sections "Sustainability Policy and Its Implementation" (E1-2) and "Company Policy and Commitments" (S1-1).

Methods and stages of involving affected communities

S3-2

The Port Authority systematically involves local communities in activity planning and project implementation, aiming to reduce potential negative impacts and increase the value created for the region. Dialogue with communities, presentation of project benefits, and ongoing communication through the media and the official port website form the basis for transparent and effective engagement. Communities are involved in the following key stages and ways:

- **Information and Familiarization**
  Communities are informed about planned and ongoing projects, their objectives, and potential impacts. Information is disseminated on the official port website, social networks, and in the media, ensuring its accessibility and transparency. Residents are also provided with contact information for the Port Authority's dispatch center, which operates around the clock, and for contractors implementing the projects, so that prompt responses can be made in problematic situations.

- **Consultations through Structured Meetings**
  In 2025, 9 meetings were held with representatives of resident communities, leaders of community organizations, and community elders. During these meetings, plans for the Port of Klaipėda, ongoing projects, and their impact on communities were presented. Representatives of residents are thoroughly informed about the progress of projects, questions are answered, and if necessary, compromise solutions are sought to minimize temporary impacts on residents. In 2026, it is planned to hold at least 6 such meetings.

- **Response to Specific Needs**
  Additional meetings are organized as needed when specific community issues or concerns arise regarding project impacts – noise, dust, pollution, or infrastructure development. This ensures prompt responses and allows for timely measures to be anticipated so that residents experience as few inconveniences as possible.

- **Direct Dialogue and Problem Solving**
  Members of the communities are given the opportunity to communicate directly with responsible employees of the Port Authority and project managers. Residents can contact the provided contacts during meetings or through publicly available information on the company's website. Raised issues are assigned to be overseen by a representative of the Port Authority according to their competence, who continues communication with community representatives until the issue is resolved.

- **Ongoing Communication and Monitoring**
  Continuous information is provided about the progress and results of projects, maintaining communication with communities and assessing their expectations and feedback. To ensure objective feedback, communities materially affected by port activities were included in targeted surveys during the double materiality assessment in 2025. The results of these surveys directly influenced the assessment of material impacts and the planning of management measures.

The highest responsibility for ensuring community engagement processes lies with the Director General, who shapes the organization's strategic goals and oversees their implementation.

Processes to remediate negative impacts and channels for workforce to raise concerns

S3-3

The Port Authority ensures that local communities have clear and accessible channels to express concerns and address negative impacts. During meetings with community representatives, their opinions and observations are heard. Negative aspects are responded to promptly, seeking common solutions. In cases where it is not possible to meet community needs, substantial reasons are provided, and compromise options are discussed. Identified issues are addressed by competent Port Authority staff, and dialogue continues between the company and community representatives until the matter is resolved.

The possibility of submitting formal reports is ensured by the description of the procedure for submitting and reviewing requests, complaints, and reports – including anonymous ones – approved by the Director General's Order No. V-254, dated 17/10/2025. This mechanism is available not only to employees but also to external stakeholders, including members of local communities. The efficiency of reporting processes is ensured by monitoring and feedback mechanisms. For more details about the report submission mechanism, refer to the section "Reporting channels and whistleblower protection policy".

During the reporting period of 2025, no significant problems or incidents related to human rights concerning affected communities were recorded, nor were there individuals subject to the Law on the Protection of Whistleblowers of the Republic of Lithuania. For more information about the report submission mechanism, refer to the section "Reporting channels and whistleblower protection policy" dedicated to topic G1 (see page 77). There were no individuals at the Port Authority subject to the Law on the Protection of Whistleblowers.

Measures and actions aimed at achieving objectives

S3-4

The Port Authority recognizes that the involvement of local communities is essential to ensure socially responsible and sustainable port development. The company systematically incorporates objectives into its sustainability strategy and promotes dialogue and partnership with communities to create mutually beneficial solutions. During the period from 2026 to 2029, a new measure has been established to enhance transparency and active collaboration – regular information provision about the projects implemented by the Port Authority that impact local communities. The company emphasizes that no significant problems or incidents related to human rights have been reported concerning the affected communities.

Measure	Responsible	Period and scope
1. Encouraging local community engagement		
1.1. Implementation of support policy	Head of Communications and Marketing Unit	2026 – 1 unit
1.2. Allocation of support to local communities, thousand EUR	Head of Communications and Marketing Unit	In 2026 – EUR 30 thousand, and from 2027 – EUR 40 thousand
1.3. Organization of regular meetings with local communities	Head of Communications and Marketing Unit	At least 6 meetings per year
1.4. Regular information provision about the projects implemented by the Port Authority that impact local communities	Head of Communications and Marketing Unit	At least 6 meetings per year

Management of community impact and effectiveness monitoring

The Port Authority considers the impact on communities through meetings, regular information sharing, feedback mechanisms, and evaluations of social initiatives. The aim is to ensure that support is allocated strategically and effectively, and that the needs of communities are adequately incorporated into port development plans.

The Audit and Risk Committee is involved in the implementation of the Sustainability Strategy, which discusses sustainability progress once a month and ensures that community engagement measures are implemented transparently and align with strategic goals.

Sustainability strategy, goals, objectives, and measures related to affected communities

S3-5

To ensure long-term social responsibility, the Port Authority has set a strategic goal – to promote sustainability initiatives and become an empowering organization. This goal encompasses not only environmental tasks but also active community engagement to ensure that port activities are developed responsibly, considering social, economic, and environmental factors.

The implementation of this strategic goal is based on the core task – a transparent and ethically managed organization. This not only strengthens the organization's reputation and transparency but also helps the Port Authority to act responsibly towards the affected communities. The implementation is based on the provisions of the Employee Code of Conduct and the Business Partner Code of Conduct. The quantitative target result is a specific rating of the good governance index: the aim is to achieve an A rating in 2026–2027, and from 2028 onwards, an A+ rating. The Governance Coordination Center conducts an annual assessment of the good governance index of state enterprises. The highest rating (A+) is awarded to companies that ensure transparent, responsible, and sustainable operations.

In developing the strategy, consideration was given to shareholder expectations, legal regulations, and trends in the areas of operations and sustainability; however, the affected communities were not directly involved in setting objectives, monitoring the results of their implementation, or identifying improvements. More information is provided in the SBM-2 disclosure, in section "Material impacts, risks, and opportunities related to affected communities".

Governance information

Business conduct 91

Diversion and sabotage 98

Cybersecurity 99

Quality of port infrastructure and sustainable port infrastructure development 100

Being a transparent and ethically managed organization and ensuring the creation of economic value and the sustainable development of Port of Klaipėda operations are among the key priorities of the Port Authority. Guided by the highest standards of operational transparency and international anti-corruption standards, as well as principles of ethics and conduct, the Port Authority aims to prevent corruption, restrict competition, cyber threats, and diversions, while also ensuring transparent management of relationships with suppliers and sustainable infrastructure development.

The company has implemented an anti-corruption management system, approved codes of conduct for employees and business partners, adopted a zero-gift policy, and ensured the protection of reporting channels and whistleblowers. The Port Authority conducts systematic risk assessments, creates a risk register, ensures the declaration of public and private interests, and employees regularly participate in training that promotes ethical behavior and transparent operations.

After conducting a double materiality assessment, business ethics was identified as a highly material topic for the Port Authority's operations. The assessment results confirmed that transparent governance is closely related to both the Port Authority's reputation and social license to operate, as well as financial results – risks of corruption, cyber incidents, or deficiencies in infrastructure management can have a direct impact on operational continuity. This section reviews four essential topics:

1. Corporate culture and business ethics, including the prevention of corruption and bribery, management of supplier relationships, and payment practices.
2. Diversion and sabotage.
3. Cybersecurity.
4. Sustainable infrastructure development.

These topics reveal how high ethical standards are sought to be ensured, strengthen stakeholder trust, and maintain the organization's resilience to external and internal threats.

Business conduct

Disclosure Requirements List

IRO-2

List of significant information disclosure requirements		Reference
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	92
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	92
GOV-1	The role of governance and supervisory bodies	97
G1-1	Business conduct policies and corporate culture	93
G1-2	Management of relationships with suppliers	94
G1-3	Prevention and detection of corruption and bribery	95
G1-4	Incidents of corruption and bribery	98
G1-5	Political influence and lobbying activities	97
G1-6	Payment practices	97

Sustainability Policy and commitments in governance

By Supervisory Board Resolution No. STP-8 dated April 16, 2025 (minutes of April 4, 2025), the Port Authority adopted a sustainability policy that includes commitments and targets related to its most material topics.

https://portofklaipeda.lt/wp-content/uploads/2025/04/2025.03.20_Uosto-direkcijos-Tvarumo-politika-1.pdf The Sustainability Policy establishes the overall direction for the implementation of the Port Authority's sustainability principles – governance: transparency and ethics. Objective: to ensure the highest standards of transparency, business ethics, and governance. Commitments:

- to adhere to anti-corruption principles and strengthen the organization's resilience to risks;
  to develop infrastructure that meets the principles of sustainable
- development and the requirements of the EU taxonomy;
- to ensure cybersecurity and data protection in all areas of activity;
- to ensure the security of the Port of Klaipėda by implementing diversion and sabotage prevention measures and strengthening response capabilities.

Direction: to build trust among stakeholders by demonstrating ethical and responsible governance. More information about the sustainability policy can be found in the E1-2 disclosure section "Sustainability Policy and Its Implementation".

Description of the processes to identify and assess material impacts, risks and opportunities

IRO-1

Detailed information about the Company's double materiality assessment and the process of identifying and evaluating material impacts, risks, and opportunities related to business ethics is provided in the section "2 ESRS IRO-1 Materiality Assessment Process".

Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3

The business model of the Port Authority is based on the management of state maritime port infrastructure and the provision of services related to port activities. The execution of these activities requires high transparency and ethical behavior both in internal processes and in relationships with business partners. The double materiality assessment confirmed that business ethics is a significant governance topic directly related to the strategic goals of the Port Authority – to maintain the status of a reliable state entity, successfully implement infrastructure and green port transformation projects, and meet the growing sustainability reporting requirements in the value chain.

Potential negative impacts have been identified in the areas of corruption and bribery – possible incidents could have significant financial, reputational, and social consequences, although no such cases have been recorded in the Company over the past decade. The actual positive impact has been identified in the area of organizational culture: social initiatives, resilience training, and engagement culture measures are already creating a tangible positive impact on employees. In the area of supplier relationships, a potential positive impact has been identified through the application of the Business Partner Code of Conduct and sustainable procurement practices in the initial stage of the value chain.

Detailed impacts, risks, and opportunities identified in the G1 area are presented in the table below.

Topic	Sub-topic	Material impacts	Description	Location in th value chain
G1 Business conduct	**Corruption and bribery**	Potential negative impact	Possible corruption incidents that could negatively affect employees, stakeholders, and the wider community.	Direct activity
		Risk	The risk of corruption and bribery, associated with potential financial and reputational consequences, despite the preventive, detection, and training measures applied.	Direct activity
	Corporate culture	Actual positive impact	The company implements additional measures that promote an ethical organizational culture, including social initiatives, support activities, resilience-building training, and the promotion of employee engagement culture.	Direct activity
	Supplier relationship management, including payment practices	Potential positive impact	Sustainable procurement practices based on the application of the Business Partner Code of Conduct, encompassing environmental and social aspects in relationships with suppliers.	Upstream chain

Business conduct policies and corporate culture

G1-1

The company adheres to the codes of conduct for employees and partners, the anti-corruption policy, and risk assessment guidelines, which help ensure transparent management of relationships with suppliers and business continuity. A list of relevant documents is provided further:

- Employee Code of Conduct (approved by the Resolution of the Supervisory Board dated January 23, 2025);
- Business Partner Code of Conduct (approved by the Resolution of the Supervisory Board dated December 13, 2024);
- Anti-corruption policy (approved by the Resolution of the Supervisory Board dated December 13, 2024);
- Compliance certificate ISO 37001:2016;
- Description of the Procedure for Submitting and Reviewing Requests, Complaints, and Reports from Individuals, Including Anonymous Reports Received Through the Reporting Channel (Approved by Order No. V-242 of the Director General dated October 8, 2018, as amended);
- Conflict of Interest Prevention Policy (approved by the Resolution of the Supervisory Board dated December 13, 2024);
- Corruption Risk Register and Corruption Risk Mitigation Plan (21 August 2025, Doc. No. AVS 34) – in the Company's internal documents;
- Employee Training (Order No. V-29 dated February 6, 2026) – in the Company's internal documents;
- Policy on the Implementation and Monitoring of Sanctions (approved by a resolution of the Supervisory Board of JSC Klaipėda State Seaport Authority on September 19, 2024).

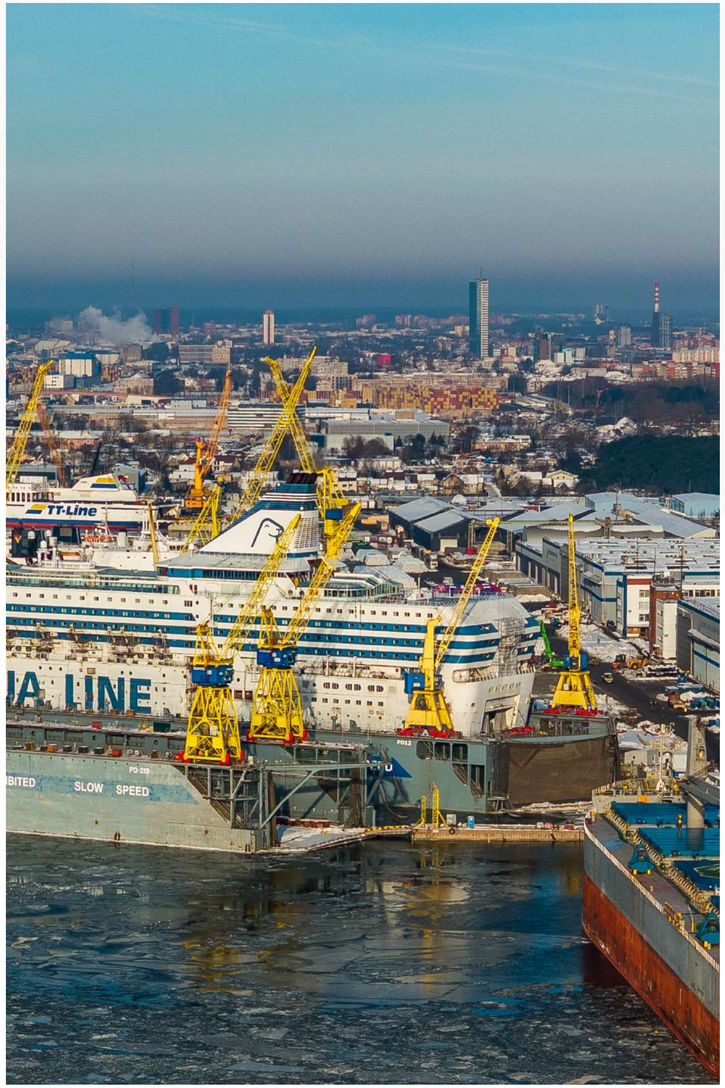
Employee Code of Conduct explicitly prohibits providing financial support to political parties, government officials, political advertising, or political campaigns, whether directly or indirectly. The company does not engage in lobbying activities.

To manage violations of sanctions and other restrictive measures, the Company has acquired access to specialized databases which, whenever a high-risk vessel enters the Lithuanian economic zone or designates the Port of Klaipėda as its destination, sends warning notifications via email to the Harbour Master Office. Collaboration is also conducted with the Customs Criminal Service; the Company has included provisions for the implementation of sanctions control in standard contracts.

The code of conduct and other business ethics documents are reviewed and updated in light of legislative changes, and employees are familiarized with the code of conduct and responsibilities through introductory training and the Company's training platform. The code of conduct is publicly available on the Company's website and in the document management system. In 2025, no disciplinary penalties were applied for ethical violations.

The implementation of business ethics principles is complemented by targeted measures to foster an organizational culture. The company systematically applies measures aimed at creating and maintaining an ethical, inclusive, and values-based organizational culture: social responsibility initiatives, donation and community support programmes, resilience training, and projects promoting employee well-being are carried out. Events and internal activities are organized to encourage employee engagement and strengthen team bonds. Regular dialogue with employees and transparent management principles support trust and create conditions for ethical behavior.

The Company assesses the maturity of its organizational culture and ethical climate using periodic surveys, risk assessment, and audit tools. The strengthening of the ethical culture is ensured through training, a system of codes of conduct, the functioning of reporting channels, and other anti-corruption management measures.



Supplier relationship management

G1-2

The Port Authority aims to ensure transparent and sustainable relationships with suppliers, adhering to the highest social, environmental, and business ethics standards.

The Supervisory Board's Resolution of December 13, 2024, approved the Business Partner Code of Conduct, which defines essential requirements for suppliers and partners. This document includes provisions related to integrity, responsibility, and sustainability, and is mandatory for suppliers and their engaged partners. Standard contracts stipulate that suppliers must adhere to the code of conduct and ensure compliance with the requirements for all individuals involved in the execution of the contract. The procurement execution procedure is described in the following documents:

- the Rules for Low-Value Procurement of the JSC Klaipėda State Seaport Authority, approved by Order No. V-81 of the Director General dated April 4, 2018;
- Description of the Procedure for Organizing and Conducting Procurement at the JSC Klaipėda State Seaport Authority, approved by Order No. V-103 of the Director General dated April 25, 2018.

Currently, the company does not directly audit suppliers for their compliance with the requirements of the Business Partner Code of Conduct. Compliance is ensured contractually: a provision established in standard contracts requires suppliers and business partners to adhere to the code's requirements and ensure their application to all individuals involved in the execution of the contract. The development of direct audit capabilities remains a priority for improvement in the medium term.

During the reporting period of 2025, no violations of public procurement policy or conflicts with suppliers were identified at the Port Authority.

Payment Practices (Procurements)

The procedure for payments to suppliers is regulated by the Order of the Director General dated April 17, 2025, No. V-111. Invoices are paid in accordance with established deadlines, but not earlier than one week before the payment deadline; earlier payments are made only upon receiving instructions from the Director General. Standard payment terms are established by the Director General's Order dated April 18, 2013, No. V-111 "On Payment Terms for Procurement Contracts": a 30-day term applies to service contracts from the date of invoice submission, while for large-scale works and contracting agreements, payments are made in stages according to the acceptance-transfer acts of completed works, also within a 30-day term. Payment terms in contracts may be adjusted according to specific project circumstances

During the reporting period of 2025, no late payments to suppliers were recorded. The implemented policy and established processes help maintain a transparent and reliable system of relationships with suppliers, contributing to the improvement of the Company's reputation and the achievement of sustainability goals.

Green Procurement

Since 2023, the Port Authority has been actively conducting green procurement in accordance with the Government of the Republic of Lithuania's resolution No. 1133 "On the Establishment and Implementation of Green Procurement Goals". The requirements for green procurement are established in accordance with the environmental protection criteria approved by the Order of the Minister of the Environment of the Republic of Lithuania dated June 28, 2011, No. D1-508.

In November 2025, the Ministry of the Environment evaluated the Port Authority's public procurement for a green hydrogen production and supply station, as a result of which the Company was recognized as the year's leader in green procurement. This was the first project of its kind in Lithuania: non-standard production and refueling station equipment was purchased, which is not widely manufactured. The public procurement of the project was distinguished by its innovation and complexity, and the tender was won by the company "MT Group". The green hydrogen production station in the area of the Port of Klaipėda is planned to be put into operation in the spring of 2026; the total project value is approximately EUR 12 million, of which about EUR 6 million is financed by EU funds and the Economic Recovery and Resilience Plan "New Generation Lithuania".

Leader in Green Procurement 2025

Prevention and detection of corruption and bribery

G1-3

The Port Authority has a zero tolerance policy towards corruption and bribery. The anti-corruption management system helps ensure transparency and fairness in the organization's activities. The system includes:

- a gift policy prohibiting any illicit or unethical gift exchanges; declaration of private interests;
- the assessment of corruption risks and the identification of the highest risk positions, which constitute 16% of all positions in
- the organization.

Corruption risks are assessed in an integrated manner – the management of corruption risks is an integral part of the Company's periodic operational risk assessment, and the identified risks are transferred to a double materiality assessment process, ensuring their consistent and systematic monitoring.

The Port Authority implements a strategic task – a transparent and ethically managed organization that ensures compliance with anti-corruption and transparency standards in all areas of activity. To create a corruption-resistant environment, specific measures have been outlined, which include the continuous strengthening of transparency within the organization:

1. The aim is to maintain a zero number of corruption incidents, ensuring that there are no cases where a criminal case would be referred to court due to potentially corrupt criminal activities committed by employees of the Port Authority.
2. In September 2025, the Port Authority was awarded the international anti-corruption management system certificate ISO 37001:2016 for the third time since 2019, confirming that the corruption prevention mechanisms meet the highest international standards.
3. Regularly, once a year, employee tolerance to corruption surveys are conducted to assess the quality and practical applicability of the measures implemented for creating a corruption-resistant environment.

Prevention procedures and accountability

Prevention and control procedures are implemented in the organization to prevent cases of corruption and bribery. The implementation of prevention is carried out by the head of the Department of Operational Resilience, who performs the anti-corruption compliance function, directly subordinate to the Director General, who has the right to report directly to the Chairman of the Supervisory Board about observed illegal actions or arising suspicions of corruption.

Reporting channels and whistleblower protection policy

The organization has internal reporting channels for reporting possible violations of laws, illegal behavior, or non-compliance with ethical standards. These channels can be used by internal employees and external stakeholders for various purposes. The procedure for handling reports is regulated by the following documents:

- Description of the Procedure for Submitting and Reviewing Requests, Complaints, and Reports from Individuals, Including Anonymous Reports Received Through the Reporting Channel (approved by order No. V-242 on 08/10/2018);
- Description of the Procedure for Providing Information in Accordance with the Law on the Protection of Whistleblowers of the Republic of Lithuania (approved by Order No. V-152 dated September 6, 2021);
- Law on the Protection of Whistleblowers of the Republic of Lithuania (dated 28 November 2017 No. XIII-804), ensuring anonymity and protection against retaliation.

Notifications/reports are accepted:

- confidentially through the Port Authority's website (dedicated section);
- via email pranesimas@port.lt;
- telephone number: +370 46 499 653;
- directly to the anti-corruption officer;
- by filling out the report form on the official Company website "portofklaipėda.lt".

Incidents of corruption or bribery

G1-4

During the 2025 reporting year, no reports were received from stakeholders, business partners, or Company employees, including anonymous reports. No corrupt activities were identified. The procedure for administering the reporting channel was updated by Order No. V-254 of the Director General, dated October 17, 2025. The Company continuously monitors the effectiveness of reporting channels and ensures the protection of whistleblower rights in accordance with legal requirements.

In order to effectively implement the provisions of the Law on the Protection of Whistleblowers, Resolution No. 1133 of the Government of the Republic of Lithuania, dated November 14, 2018, "On the Implementation of the Law on the Protection of Whistleblowers of the Republic of Lithuania", has approved the following:

- Description of the Procedure for Rewarding Whistleblowers for Valuable Information;
- Description of the Procedure for Compensating Whistleblowers for Negative Impacts or potential Consequences Due to the Submitted Report;
- Description of the Procedure for Establishing Internal Channels for Reporting Violations and Ensuring their Operation.

Employee training and education

Anti-corruption training in the Company is conducted regularly, at least 1–2 times a year, and is mandatory for all employees. In 2025, the following trainings were implemented:

- Anti-corruption training in the Company is conducted regularly, at least 1–2 times a year, and is mandatory for all employees. In 2025, the following trainings were implemented:
- Anti-corruption training in the Company is conducted regularly, at least 1–2 times a year, and is mandatory for all employees. In 2025, the following trainings were implemented:
- On June 19, 2025, anti-corruption training was organized for all employees on the topic “Creating an Anti-Corruption Environment in the Institution”. Number of participants: 184. The training covered the essential provisions of the Company’s anti-corruption policy, employee duties, and principles of maintaining the anti-corruption management system;
- On September 11, 2025, a training session was organized for project managers, employees of the Harbour Master Office, and individuals involved in the procurement process on the topic “Implementation of International Sanctions: The Port Authority’s Procedures for Implementing Sanctions”. Number of participants: 174;
- In October-December 2025, training on the topic “Declaration of Private Interests” was organized for employees required to declare private interests. 140 employees completed the training.

Employees of the Department of Operational Resilience additionally participated in specialized training: “Risk Assessment of Financial Crimes from the Perspective of ISO 31000” and “Corruption Risk and Conflicts of Interest: Practical Advice on How to Identify and Manage Risks and Avoid Mistakes and Liabilities”.

In September-October 2025, a survey was conducted to assess the level of resilience to corruption, in which 111 Company employees participated. The survey results confirmed that the Company’s level of resilience to corruption is very high.

The Port Authority’s corruption prevention system demonstrates the Company’s commitment to operate transparently, effectively, and ethically, ensuring the highest business standards and trust from employees and stakeholders.

Training indicators related to G1 risks	Positions that pose a risk – managers	Management and supervisory bodies	Other salaried employees
Training coverage			
Total (number of employees)	36	15	174
Total number of participants (number of employees)	25	7	138
Training method and duration			
Computer-based training (hours)	6	6	6
Frequency (times per year)	2	2	2
Covered topics			
Corruption	x	x	x
Corruption policy	x	x	x
Procedures regarding suspicion	x	x	x
Sanctions	x	x	x

Political influence and lobbying activities

G1-5

The company does not engage in lobbying activities and does not make political donations or financial contributions to political parties or politicians. The information required by the G1-5 standard does not apply during the reporting period.

Payment practices

G1-6

The Port Authority has a strict financial control system in place to ensure timely payments to suppliers. According to the Order No. V-107 of the Director General, "On the Establishment of the Procedure for the Acceptance and Payment of Invoices", dated 17/04/2025, responsibilities for accurate and timely payments are defined. In addition, the Financial Control Rules, approved by Order No. V-188 of 2022, ensure strict oversight of all financial transactions.

At the Port Authority, payment terms are established by Order No. V-111 of the Director General, dated April 17, 2025, "On Persons Authorized to Sign and Pay Invoices Submitted to the Port Authority and Acceptance and Transfer Acts", which regulates the payment procedure: for purchases of works, goods, and services, excluding ongoing operational services and dredging and/or maintenance works in the port area, where the contract value including VAT exceeds EUR 145,000 thousand, a 60-day payment term is established; for other procurements under contracts, a 30-day payment term is established. The payment terms applied by the company are the same for all suppliers, regardless of whether they are classified as small and medium-sized enterprises (SMEs) or large companies.

Based on the data from the reporting period of 2025:

- 100% of all invoices are paid within the established terms. In exceptional cases, upon receiving instructions from the
- Director General, invoices may be paid earlier than scheduled.
- Invoices not linked to contracts (paid based on applications) are paid on average within 10 days.

Invoices under contracts are paid according to the terms of the contracts:

- Invoices for works, goods, and services (excluding ongoing operational services and dredging and/or maintenance works), where the contract value including VAT exceeds EUR 145 thousand, are paid on average within 60 days, while other purchases are paid on average within 30 days.

The Role of Management and Supervisory Bodies in Business Ethics

GOV-1

The management and supervisory bodies of the Port Authority actively participate in shaping and implementing the organization's business conduct policies. The highest governing body of the Company is the General Meeting of Shareholders. The collegial supervisory body – the Supervisory Board – consists of 5 members. On March 31, 2025, member Eligijus Kajieta resigned from the Supervisory Board. The collegial governance body – the Board – also consists of 5 members. In 2025, Ela Žemaitienė also resigned from the Board.

The Supervisory Board is responsible for overseeing business ethics and transparency strategies, including the periodic evaluation of anti-corruption policies, whistleblower protection, and codes of ethical conduct. Two committees operate under the Supervisory Board: the Audit and Risk Committee, which provides objective and impartial conclusions regarding the functioning of internal and external audits, risk management, and control systems, and the Remuneration and Nomination Committee. The Supervisory Board and the Audit and Risk Committee report on business ethics according to an approved meeting schedule – the sustainability progress review was presented at each meeting in 2025.

In 2025, the Company structure was update. Instead of the Prevention Department, a Department of Operational Resilience was established, whose head, performing anti-corruption compliance functions, reports directly to the Director General and has the right to directly inform the Chairman of the Supervisory Board about any observed illegal actions or suspicions of corruption.

Board members, being employees of the Company, generally participate in all anti-corruption training according to the approved training plan. Separate anti-corruption training is not organized for the members of the Supervisory Board. More detailed information about the training coverage and content is provided in section G1-4.

The maturity of the Company's governance is confirmed by the 2024/2025 Governance Coordination Center good governance index rating – A- according to the updated assessment methodology (according to the previous methodology, the rating would correspond to A+).

Diversion and sabotage

Material impact, risks, and opportunities related to diversion and sabotage

IRO-1

The risk of diversion and sabotage at the Port of Klaipėda is assessed as material and may have a substantial impact on the Company's reputation and operational continuity. The risk analysis includes the management of potential threats such as unauthorized access, security breaches, sabotage, and illegal migration. This impact is relevant in the short, medium, and long term. Plans have been prepared for this purpose, approved by various legal acts of the Republic of Lithuania, which ensure port security and the reliability of partners on an international scale.

SBM-3

The Port of Klaipėda is critical national infrastructure, and any disruption in its operations would have a direct systemic impact on the country's economy, energy security, and international trade. The double materiality assessment confirmed that diversion and sabotage are material topics – although the likelihood of an incident is assessed as very low, the potential scale of impact is very high, making the topic a priority at all times.

Identified risks of potential negative impact (insufficient port security) could lead to systemic effects on stakeholders, surrounding communities, and the general public, including threats to hazardous objects/materials within the port area. From a financial materiality perspective, acts of sabotage and diversion could cause significant disruptions to operational continuity and financial and reputational consequences for the Company.

The prevention of diversion and sabotage is an integral part of the Company's strategic management, directly related to commitments to ensure uninterrupted port operations and to protect state-critical infrastructure. Comprehensive identified impacts, risks, and opportunities are presented in the table below.

Topic	Sub-topic	Material impacts	Description	Location in the value chain
Other topics	**Diversion and sabotage**	Potential negative impact	Insufficient port safety and security measures can pose systemic risks affecting stakeholders, surrounding communities, and the general public, including threats to hazardous objects/materials within the port area	Direct activity

Measures for managing diversions and sabotage

The Port Authority implements consistent and multilayered security measures aimed at reducing the threats of diversions and sabotage. Extraordinary security checks of port facilities and annual security assessments are conducted to ensure continuous control and updates of procedures. Security management is based on the following legally approved plans:

- Comprehensive Safety Plan, approved by Resolution No. 490 of the Government of the Republic of Lithuania on April 30, 2001
- The Port Authority's security plan, approved by the Order No. 3-34 of the Minister of Transport of the Republic of Lithuania;
- The Port Security Plan, approved by the Order No. 5S-1RN of the Minister of Transport of the Republic of Lithuania;
- The Port Emergency Plan, approved by Order No. V-82 of the Director General dated April 8, 2024;
- The sustainability strategy states that port land users and infrastructure tenants will be checked at least 3 times a year starting from 2025 regarding the preparation and updating of internal emergency and crisis plans. The responsible person is the civil protection specialist.
- The sustainability strategy states that port security and civil protection exercises will be conducted at least 5 times a year starting from 2025. The responsible person is the head of the Facility Maintenance Division.

All land users of the Port of Klaipėda, operators of hazardous objects/materials, and terminals must regularly update their security and emergency plans, coordinated with the Port Authority and the Ministry of Transport of the Republic of Lithuania. Collaboration with national and international institutions ensures the effectiveness of the security strategy.

Cybersecurity

Impacts, risks, and opportunities arising from cybersecurity

IRO-1

Cybersecurity is a fundamental priority for the Port Authority, considering the continuously growing threats and attempts to affect the Company's information systems. During the reporting period of 2025, no cybersecurity incidents were recorded in the organization that had a material impact on the operation, availability, integrity, or confidentiality of networks and information systems.

The organization employs automated cybersecurity measures that effectively identify and limit the constant standard internet "noise" – unwanted and fraudulent emails and isolated illegal attempts to access the Company's information systems available online. These cases were managed with standard security control measures and are not considered incidents that affected system performance. Internal and external audits are conducted continuously to ensure proper prevention and protection.

SBM-3

The Port of Klaipėda is critical national infrastructure, requiring continuously operating information and technology systems for its management. The business model of the Port Authority – infrastructure management, navigation services, and coordination of port operations – directly depends on the continuity of information systems, data protection, and technological resilience. In this context, cybersecurity is an integral part of the Company's strategic management.

The double materiality assessment confirmed that cybersecurity is a significant governance issue. Two risks were identified: the risk of ineffective response to cyber incidents, assessed as having high materiality, and the risk of cyber incidents that have a material impact on the operations of the Port Authority. The source of both risks is the growth of external threats and the current distribution of the cybersecurity function among different IT staff as an additional function rather than as a separate centralized responsibility.

Although the probability of high-impact incidents is assessed as very low due to the technical and organizational measures in place, the growing geopolitical tensions and context of cyber threats increase the relevance of this issue in the medium and long term.

In 2025, the Port Authority took an important step towards strengthening technological resilience – the first private 5G network in the country was activated at the Port of Klaipėda, enhancing the port's resilience and preparedness for future challenges. Effective solutions have also been found to manage risks related to GNSS disruptions – this is additional confirmation that the Company actively responds to technological threats.

Comprehensive impacts, risks, and opportunities (IRO) identified in the area of cybersecurity are presented in the table below.

Topic	Sub-topic	Material impacts	Description	Location in the value chain
Other topics	**Cybersecurity**	Risk	Ineffective response to cyber incidents due to the lack of a centralized cybersecurity function can lead to delays in managing incidents affecting systems and greater damage	Direct activity
		Risk	Cyber incidents can disrupt the Port Authority's information systems and operational activities, causing significant financial, reputational, and operational continuity consequences	Direct activity

Cybersecurity risk management measures

Cybersecurity encompasses technologies and decisions made by people as well as their behavior. Global practice shows that the majority of security incidents occur due to human errors – careless handling of data or suspicious emails, low-security passwords. It is aimed that every employee understands their responsibility in ensuring the security of the Company's digital space.

To ensure the continuity and effectiveness of cybersecurity, the following measures are implemented in the Company:

- Cybersecurity risk management measures are implemented in accordance with the following legal acts and standards: Cybersecurity Law; Law on the Management of State Information Resources of the Republic of Lithuania; Lithuanian standard LST ISO/IEC 27001:2023 "Information Security, Cybersecurity, and Privacy Protection". Information security management systems. Requirements; Lithuanian standard LST ISO/IEC 27002:2023 "Information Security, Cybersecurity, and Privacy Protection. Information security control measures; Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (General Data Protection Regulation).
- Set of information security documents, approved by Order No. V-133 of the National Cyber Security Center on June 17, 2024, ensuring compliance with national security standards.
- Annual internal and external audits are conducted to monitor and assess the security of information systems.
- Regular employee training is conducted to raise awareness of cybersecurity risks, test knowledge, and promote safe behavior practices in daily activities. The target outcome is that at least 72% of employees complete cybersecurity risk training. The responsible person is the head of the Department of Operational Resilience.
- To centralize the management of the cybersecurity function, an additional position is planned to be established, responsible for systematic security process management, incident prevention, and response.

In 2025, the first private 5G network in the country was activated at the Port of Klaipėda, enhancing the technological resilience of the port and its preparedness for future challenges. The company, as a cybersecurity entity, directly applies the requirements of the Cybersecurity Law, which transposes the provisions of the EU NIS2 Directive into national law. The ISO 27001 standard is used as a methodological benchmark for internal non-compliance assessments, but the Company does not plan to certify its implementation. The Port Authority continuously strengthens its cybersecurity strategy to ensure the reliability and security of systems.

Quality of port infrastructure and sustainable port infrastructure development

Material impact, risks, and opportunities regarding port infrastructure

IRO-1

The quality of the infrastructure of the Port of Klaipėda and its sustainable development is one of the main functions of the Company, as stipulated in the Law on the Klaipėda State Seaport of the Republic of Lithuania, directly contributing to the competitiveness of the Lithuanian economy, energy security, and the attractiveness of the region.

The company invests annually in the maintenance of existing facilities and the development of new infrastructure projects to ensure high service quality and adapt the infrastructure to new needs. In 2025, significant projects were completed, including the reconstruction of breakwaters, dredging works near the breakwaters and Kiaulės Nugara, and the construction of a new fleet base. Projects for hydrogen production and onshore power supply have gained momentum; the construction of the cruise ship terminal and the reconstruction of the quays continued. Preparatory works for the development of the southern part of the port have been completed, and the procurement processes for the construction of the southern port gates have begun. The first steps have been taken to revitalize the Jurbarkas river port. In the medium term, the development of the engineering industry at the port is planned, while in the long term, the strategic development project for the southern part of the port it to be continued.

Further details on ongoing sustainable infrastructure initiatives are provided in the IRO-1 disclosure under the section "Climate Change Analysis and its Impact on the Port of Klaipėda".

ISBM-3

The business model of the Port Authority is based on the management, development, and provision of services related to state-owned maritime port infrastructure. The quality of infrastructure is a direct factor in the Company's competitiveness, service level, and ability to attract international clients, thus sustainable infrastructure development is an integral part of the Company's strategy.

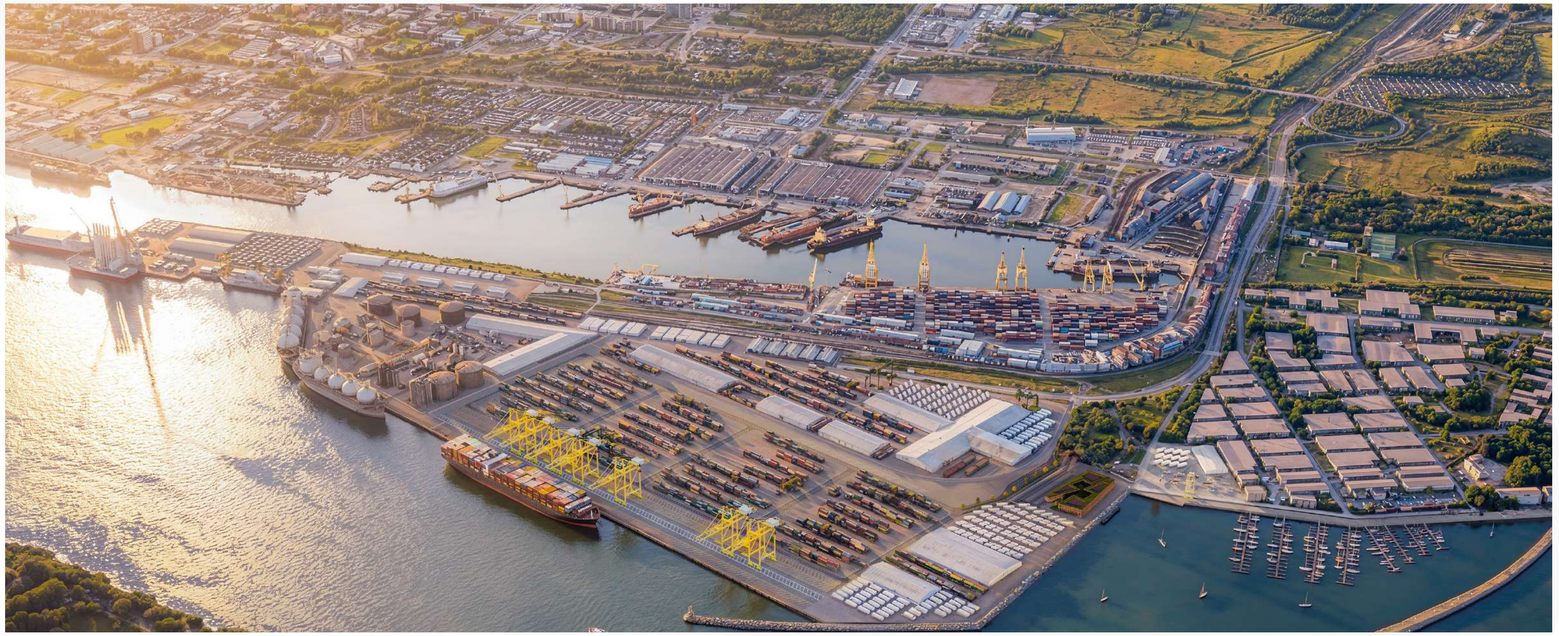
The double materiality assessment confirmed that the quality of port infrastructure and sustainable development is a significant governance issue. The identified actual positive impact – sustainable infrastructure development enhances the attractiveness of the city and state, directly contributing to Lithuania's competitiveness and strengthening the region's position. A significant strategic opportunity – investments in innovative and sustainable solutions, such as digitized port processes and electrified quays, allow for maintaining high service quality, attracting international clients, increasing cargo flows, enhancing operational efficiency, and reducing costs.

From a financial materiality perspective, the identified risk – insufficient funding or diversion of investments to other areas may lead to delays in the renewal of infrastructure facilities or deterioration of their condition, which would negatively affect the port's operational efficiency and service quality. To manage this risk, the dynamics of EU requirements and funds are monitored, and measures are planned to ensure compliance with the requirements.

Infrastructure development also directly interacts with the climate change mitigation strategy – the creation of electrified quays and green corridors is inseparable from the overall implementation of the decarbonization plan. In this sense, infrastructure investments have dual value: they strengthen the port's competitiveness while also contributing to the Company's environmental commitments.

The identified impacts, risks, and opportunities (IRO) in the area of port infrastructure quality and sustainable development are presented in the table below.

Topic	Sub-topic	Material impacts	Description	Location in the value chain
Other topics	**Port infrastructure quality and sustainable development**	Actual positive impact	Sustainable infrastructure development enhances the attractiveness of the city and state, contributes to economic growth, and Lithuania's competitiveness in the region.	Direct activity
		Risk	Insufficient funding or diversion of investments may lead to delays in infrastructure renewal, negatively affecting operational efficiency and service quality.	Direct activity
		Opportunity	Investments in digitized processes, electrified quays, and green corridors allow for attracting international clients, increasing efficiency, and fulfilling decarbonization commitments.	Direct activity



Management measures for sustainable infrastructure

The Port Authority actively implements sustainable development projects that ensure high quality and modernization of port infrastructure. In 2025, the Company's investments amounted to EUR 59.7 million. Investment decisions are made based on clear return principles – investments in cargo turnover and passenger service infrastructure are implemented when a minimum internal rate of return (IRR) of 5% is forecasted.

The following main infrastructure development directions are being implemented:

- **Green infrastructure** – infrastructure for onshore power supply (OPS) is being developed, the first green hydrogen production station in the country is being established, non-polluting pilot boats are being acquired, and a waste collection vessel powered by green hydrogen is being constructed.
- **Modernization of quays** – the construction of the cruise ship quay is ongoing, quays are being reconstructed, and preparatory works for the construction of the offshore wind farm infrastructure are being carried out.
- **Strategic development** – preparatory works for the development of the southern part of the port have been completed, procurement processes for the construction of the southern port gates have begun; initial steps are being taken to develop the infrastructure of the Jurbarkas Port.

Digitalization and security – the first private 5G network in the country has been activated, the Cargo and Goods Information System (KIPIS) is being developed, and the radar system is being updated.

Investments totaling EUR 733 million are planned for the 2026–2029 period, the majority of which (~80%) will be allocated to the development of the southern part of the port, the construction of a cruise ship terminal, the construction of offshore wind farm infrastructure, and the reconstruction of quays. In management practice, the dynamics of EU requirements and funds are monitored, and measures are planned to manage financing risks in the event that the requirements are deferred.

Infrastructure development projects are implemented in accordance with environmental impact assessment requirements, applying responsible public procurement principles and focusing on the selection of contractors that meet sustainability criteria.

Annexes

List of Disclosure Requirements According to ESRS

Code	Title, reference to the section of the report	Page
ETAS 2 – General Disclosures		
2 ETAS	General Disclosures	8 p.
BP-1	General Disclosures	8 p.
BP-2	Disclosures in relation to specific circumstances	8 p.
GOV-1	The role of management and supervisory bodies	8 p.
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	8 p.
GOV-3	Integration of sustainability-related performance in incentive schemes	8 p.
GOV-4	Statement on due diligence	8 p.
GOV-5	Risk management and internal controls over sustainability reporting	8 p.
SBM-1	Strategy, business model and value chain	8 p.
SBM-2	Interests and views of stakeholders	8 p.
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	8 p.
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	8 p.
IRO-2	Disclosure requirements in ESRS covered by the undertaking's Sustainability Report	8 p.

Code	Pavadinimas, nuoroda į ataskaitos dalį	Page
E1 · Climate change: Climate change mitigation and energy		
E1	Climate change: Climate change mitigation and energy	32 p,
2 ETAS GOV-3-E1	Integration of sustainability-related performance in incentive schemes	–
IRO-1	Description of the process for identifying and assessing material climate-related impacts, risks, and opportunities	33 p.
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	34 p.
2 ETAS SBM-3-E1	Material impacts, risks and opportunities and their interaction with strategy and business model	34 p.
E1-1	Transition plan for climate change mitigation	37 p.
E1-2	Policies related to climate change mitigation and adaptation	40 p.
E1-3	Actions and resources in relation to climate change policies	41 p.
E1-4	Targets related to climate change mitigation and adaptation	38 p.
E1-5	Energy consumption and mix	45 p.
E1-6	Total GHG emissions at Scope 1, 2, and 3 and their overall amount	46 p.
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	48 p.
E1-8	Internal carbon pricing	48 p.
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	37, 48 p.

Code	Title, reference to the section of the report	Page
E2 – Pollution		
E2	Pollution	49 p.
IRO-1	Description of processes aimed at identifying and assessing material pollution impacts, risks, and opportunities	49 p.
SBM-3	Description of processes aimed at identifying and assessing material pollution impacts, risks, and opportunities	50, 56 p.
E2-1	Policies related to pollution	52 p.
E2-2	Actions and resources related to pollution	52 p.
E2-3	Objectives related to pollution	53 p.
E2-4	Pollution of air, water and soil	54 p.
E2-5	Substances of concern and substances of a particularly high concern	55 p.
E2-6	Estimated financial impact of significant risks and opportunities related to pollution	55 p.

Code	Title, reference to the section of the report	Page
E4 – Biodiversity and ecosystems		
E4	Biodiversity and ecosystems	32 p.
IRO-1	Description of significant impacts, risks and opportunities related to biodiversity and ecosystems	–
SBM-3	Significant impacts, risks and opportunities and their interaction with the strategy and business model	33 p.
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	34 p.
E4-2	Policies related to biodiversity and ecosystems.	34 p.
E4-3	Actions and resources related to biodiversity and ecosystems	37 p.
E4-4	Targets related to biodiversity and ecosystems.	40 p.
E4-5	Impact indicators related to changes in biodiversity and ecosystems.	41 p.
E5 – Circular economy		
E5	Circular economy	56 p.
IRO-1	Description of material impacts, risks, and opportunities related to resource use and circular economy	33, 49, 62 p.
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	50 p.
E5-1	Policies related to resource use and circular economy	52 p.
E5-2	Actions and resources related to resource use and circular economy	52 p.
E5-3	Targets related to resource use and circular economy	53 p.
E5-5	Resource outflows	54 p.
E5-6	Anticipated financial consequences related to material resource use and impacts, risks, and opportunities of circular economy	55 p.

Code	Title, reference to the section of the report	Page
S1 – Own workforce: Working conditions		
S1	Own workforce: Working conditions	71 p.
SBM-2	Interests and views of stakeholders	73, 86 p.
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	73 p.
S1-1	Policies related to own workforce	74 p.
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	75 p.
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	75 p.
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	77 p.
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	79 p.
S1-6	Characteristics of the company's salaried employees	80 p.
S1-8	Collective agreement coverage and social dialogue	81 p.
S1-9	Diversity metrics	82 p.
S1-10	Fair remuneration	82, 84 p.
S1-11	Social protection	82 p.
S1-12	Disabled individuals	82 p.
S1-13	Training and skills development metrics	82 p.
S1-14	Health and safety metrics	83 p.
S1-15	Work-life balance metrics	84 p.
S1-16	Compensation indicators (pay gap and total compensation)	84 p.
S1-17	Incidents, complaints, and material impact on human rights	85 p.

Code	Title, reference to the section of the report	Page
S2 – Workers in the value chain		
S2	Workers in the value chain	–
S2-1	Policy related to affected communities	insignificant
S2-4	Human rights issues and incidents related to value chain links	insignificant
S3 – Impact on communities: Friendly relations with the local community		
S3	Impact on communities: Friendly relations with the local community	85 p.
SBM-2	Interests and views of stakeholders	86 p.
S3-1	Policy related to affected communities	88 p.
S3-2	Processes for involving affected communities in addressing impact issues	88 p.
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	88 p.
S3-4	Measures taken to address material impacts on affected communities, methods for managing material risks to affected communities and capitalizing on material opportunities, and the effectiveness of those measures	89 p.
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	89 p.
S4 – Consumers and end-users		
S4	Consumers and end-users	–
S4-1	Consumer and end-user policies	insignificant
S4-4	Human rights issues and incidents	insignificant

Code	Title, reference to the section of the report	Page
G1 – Business conduct		
G1	Business conduct	91 p.
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	92, 98, 101 p.
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	92, 98-100 p.
GOV-1	The role of administrative, governance and supervisory bodies	97 p.
G1-1	Business conduct policies and corporate culture	93 p.
G1-2	Management of relationships with suppliers	94 p.
G1-3	Prevention and detection of corruption and bribery	95 p.
G1-4	Incidents of corruption and bribery	98 p.
G1-5	Political influence and lobbying activities	97 p.
G1-6	Payment practices	97 p.

ANNEX. EU Taxonomy KPI tables (2025)

Key Performance Indicators (KPIs) in Annex II of Regulation (EU) 202172178 - revenue, capital expenditures (CapEx), and operating expenses (OpEx), are presented in accordance with environmental objectives, including an assessment of the Substantial Contribution (SC) and Do No Significant Harm (DNSH) criteria.

1. Percentage of revenue (Turnover) according to the Taxonomy Regulation

2025 financial year | Total turnover: 63.310,28 thousand euros

				Substantial contribution criteria						Do no significant harm (DNSH) criteria							
Economic activities under the taxonomy regulation	Codes	Revenue	Part of the revenue	Climate change mitigation	Adaptation to climate change	Water	Circular economy	Pollution prevention	Biodiver-sity	Climate change mitigation	Adaptation to climate change	Water	Circular economy	Pollution prevention	Biodiver-sity	Part of criterion aligned or taxonomy eligible activities, 2024	Enabling activity / Transition activity
				Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N	Y N	Y; N	Y; N	Y; N	Y; N		
A. TAXONOMY ACTIVITIES																	
A.1. Environmentally sustainable activity (taxonomy-aligned activity)																	
Water transport infrastructure	CCA 6.16	42,617	0.1%	Y	Y	Y	TNE	TNE	Y	Y	Y	Y	Y	Y	Y	0.0%	E
Revenues from environmentally sustainable activities (A.1.)		**42,62**	**0,07%**														
Of which: enabling activities (E)		42,62	0,07%														
Of which: transition activities (T)			0,00%														
A.2. Taxonomy-aligned but not environmentally sustainable activities (taxonomy-aligned activity not meeting the criteria)																	
Infrastructure that facilitates low-carbon water transport; Water transport infrastructure (1)	CCM 6.16, CCA 6.16 (1)	6 700,29	10,58%	N	Y	Y	Y	Y	Y	N	Y	Y	Y	T	Y	10,01%	
Acquisition and ownership of buildings activities	CCM 7.7	31,92	0.05%	N	N	TNE	TNE	TNE	TNE	N	N	Y	Y	Y	Y	0.05%	
ata processing, hosting, and related activities	CCM 8.1	219,01	0,35%	N	N	N	N	TNE	TNE	Y	Y	N	N	Y	Y	0.34%	
Cleanup of contaminated sites and areas	PPC 2.4	31,33	0.05%	N	N	N	N	N	N	N	N	N	N	N	N	0.02%	
Taxonomically defined but environmentally unsustainable activities - not aligned revenues (A.2.)		**6 982,55**	**11,03%**													**10,43%**	
Revenues from taxonomy-eligible activities (A.1.+A.2.)		**7 025,16**	**11,10%**													**10,43%**	
B. NON-TAXONONY ACTIVITIES																	
Revenues from non-taxonomy activities		56 285,12	88,90%													89,57%	
Total (A+B)		**63 310,28**	**100,00%**													**100,00%**	

2. Percentage of operating expenses (OpEx) according to the Taxonomy Regulation

Financial year 2025 | Total OpEx: 9.221,77 thousand euros

Economic activities under the taxonomy regulation	Codes	Revenue	Part of the revenue	Substantial contribution criteria						Do no significant harm (DNSH) criteria						Part of criterion aligned or taxonomy eligible activities, 2024	Enabling activity / Transition activity
				Climate change mitigation	Adaptation to climate change	Water	Circular economy	Pollution prevention	Biodiver-sity	Climate change mitigation	Adaptation to climate change	Water	Circular economy	Pollution prevention	Biodiver-sity		
				Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N		
A. TAXONOMY ACTIVITIES																	
A.1. Environmentally sustainable activity (taxonomy-aligned activity)																	
Infrastructure enabling low carbon dioxide emitting water transport; Water transport infrastructure	CCM 6.16, CCA6.16 (1)	110,63	1,20%	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	0.0%	E
Cleanup of contaminated sites and areas	PPC 2.4 (1)	18,90	0,20%	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	0.00%	E
Environmentally sustainable activities OpEx (A.1.)		**129,53**	**1,40%**														
Of which: enabling activities (E)		129,53	1,40%														
Of which: transition activities (T)			0,00%														
A.2. Taxonomy-aligned but not environmentally sustainable activities (taxonomy-aligned activity not meeting the criteria)																	
Cargo maritime and coastal water transport, vessels for port operations and auxiliary activities	CCM 6.10	9,88	0,11%	N	N	N	Y	Y	Y							0,18%	
Cargo maritime and coastal water transport, vessels for port operations and auxiliary activities	CCM 6.10, CCA 6.10	109,86	1,19%	N	N	Y	Y	Y	Y							4,10%	T
Rail transport infrastructure	CCM 6.14	468,84	5,08%	Y	N	N	N	N	N							2,96%	E
Infrastructure enabling low carbon dioxide emitting water transport; Water transport infrastructure	CCM 6.16, CCA 6.16	161,58	1,75%	N	N	N	N	N	N							1,36%	E
Transporting by motorcycles, passenger cars, and light commercial vehicles	CCM 6.5	21,71	0,24%	N	N	Y	N	N	Y							0,21%	
Acquisition and ownership of buildings	CCM 7.7	36,65	0,40%	N	Y	TNE	TNE	TNE	TNE							0,15%	
Data processing, hosting, and related activities	CCM 8.1	113,52	1,23%	N	N	N	N	Y	Y							1,10%	
Maintenance of roads and highways	CE 3.4	49,08	0,53%	N	N	N	N	N	N							1,20%	
Taxonomy-eligible but not environmentally sustainable activities - not aligned OpEx (A.2.)		**971,13**	**10,53%**													**11,43%**	
OpEx of taxonomy-eligible activities OpEx (A.I. + A.2.)		**1 100,66**	**11,94%**													**11,43%**	
B. NON-TAXONONY ACTIVITIES																	
OpEx of activities that are not taxonomy-eligible		8 121,11	88,06%													88,57%	
Total (A+B)		**9 221,77**	**100,00%**													**100,00%**	

PORT OF KLAIPĖDA

3. Percentage of capital expenditures (CapEx) according to the Taxonomy Regulation

2025 financial year | Total CapEx: 79 223,14 thousand euros

Economic activities under the taxonomy regulation	Codes	Revenue	Part of the revenue	Substantial contribution criteria						Do no significant harm (DNSH) criteria						Part of criterion aligned or taxonomy eligible activities, 2024	Enabling activity / Transition activity
				Climate change mitigation	Prisitaikymas prie klimato kaitos	Water	Circular economy	Pollution prevention	Biodiver-sity	Climate change mitigation	Prisitaikymas prie klimato kaitos	Water	Circular economy	Pollution prevention	Biodiver-sity		
				Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N; TNE	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N		
A. TAXONOMY ACTIVITIES																	
A.1. Environmentally sustainable activity (taxonomy-aligned activity)																	
Cargo maritime and coastal water transport, vessels for port operations and auxiliary activities	CCM 6.10, CCA 6.10	5 967,63	7,53%	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	7,06%	T
Infrastructure enabling low carbon dioxide emitting water transport; Water transport infrastructure	CCM 6.16, CCA 6.16	15 338,42	19,36%	Y	Y	Y	Y	Y	TNE	Y	Y	Y	Y	TNE	Y	0,06%	E
Water transport infrastructure	CCA 6.16	1 477,32	1,86%	Y	Y	Y	Y	Y	TNE	Y	Y	Y	Y	TNE	Y	0.00%	E
Transporting by motorcycles, passenger cars, and light com-mercial vehicles	CCM 6.5	65,70	0,08%	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	0.0%	
Hydrogen production	CCA 3.10	3 426,37	4,32%	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	0.00%	T
Environmentally sustainable operational activities OpEx (A.1.)		**26 275,44**	**33,07%**														
Of which: enabling activities (E)		16 815,74	21,23%														
Of which: transition activities (T)		9 394,00	11,86%														
A.2. Taxonomy-aligned but not environmentally sustainable activities (taxonomy-aligned activity not meeting the criteria)																	
Production of low carbon dioxide emission transport technologies	CCM 3.3 (1)	4 117,34	5,20%	N	N	N	N	N	N							0,00%	
Electricity transmission and distribution	CCM 4.9, CCA 4.9 (1)	0,03	0,00%	N	Y	Y	Y	Y	Y							0,00%	
Cargo maritime and coastal water transport, vessels for port operations and auxiliary activities	CCM 6.10, CCA6.10 (1)	62,99	0,08%	N	N	N	Y	Y	N							0,00%	
Rail transport infrastructure	CCM 6.14 (1)	461,97	0,58%	Y	N	N	N	N	N							0,00%	
Infrastructure enabling low carbon dioxide emitting water transport; Water transport infrastructure	CCM 6.16, CCA 6.16 (1)	23 093,53	29,15%	N	N	N	N	N	N							0,00%	E
Construction of new buildings	CCM 7.1 (1)	8 439,78	10,65%	Y	N	N	N	N	Y							0,00%	
Installation of renewable energy technology	CCM 7.6 (1)	0,03	0,00%	Y	Y	Y	Y	Y	Y							0,00%	
Data processing, hosting, and related activities	CCM 8.1 (1)	48,01	0,06%	N	N	N	N	Y	Y							0,00%	
Water transport infrastructure	CCA 6.16 (1)	5 702,53	7,20%	Y	Y	Y	Y	Y	Y							0,00%	
Cleanup of contaminated sites and areas	PPC 2.4 (1)		0,00%	N	N	N	N	N	N							0,00%	
Taxonomy-eligible but not environmentally sustainable activities - not aligned OpEx (A.2.)		**41 926,20**	**52,92%**													**48,62%**	
OpEx of taxonomy-eligible activities OpEx (A.I. + A.2.)		**68 201,64**	**86,09%**													**57,94%**	
B. NON-TAXONONY ACTIVITIES																	
OpEx of activities that are not taxonomy-eligible		11 021,50	13,91%													42,06%	
Total (A+B)		**79 223,14**	**100,00%**													**100,00%**	

Explanations of abbreviations and symbols

Category	Code	Explanation
Substantial contribution criteria	Y	Yes (taxonomy-aligned activity meeting the criteria)
	N	No (taxonomy-aligned activity not meeting the criteria)
	TNE	Taxonomy-non-aligned activity regarding the relevant objective
Do No Significant Harm (DNSH) criteria and necessary protective measures	Y	Yes
	N	No
Goal	CCM	Climate change mitigation
	CCA	Adaptation to climate change
	WIR	Water and marine resources
	CE	Circular economy
	PP	Pollution prevention and control
	BIO	Biodiversity and ecosystems
Type of activity	S	Enabling activity
	P	Transition activity

NB: The assessment of DNSH criteria (Y/N) is provided only in the rows of environmentally sustainable (compliant) activities. A.1 A.2 (not aligned) activities are formally not subject to DNSH assessment, as the activity did not meet the initial Substantial Contribution (SC) assessment stage.

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LIMITED ASSURANCE REPORT PROVIDED BY AN INDEPENDENT PRACTITIONER REGARDING THE SUSTAINABILITY REPORT OF JSC KLAIPĖDA STATE SEAPORT AUTHORITY

To the shareholder of JSC Klaipėda State Seaport Authority:

Conclusion of limited assurance

We conducted a limited assurance engagement for the JSC Klaipėda State Seaport Authority (hereinafter – Company) 2025 Sustainability Report (hereinafter – Sustainability Report), prepared in accordance with the European Sustainability Reporting Standards (hereinafter – ESRS) established by the European Commission Delegated Regulation (EU) 2023/2772, and considering the requirements of the European Parliament and Council Directive (EU) 2022/2464 on corporate sustainability reporting (CSRD) and the legal acts of the Republic of Lithuania implementing the provisions of the aforementioned directive (hereinafter – basis for preparing the Sustainability Report).

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the Company's 2025 Sustainability Report is not prepared in accordance with the applicable basis for preparing the Sustainability Report in all material respects.

Our conclusion of limited assurance includes:

- compliance with the European Sustainability Reporting Standards (ESRS), including that the process undertaken by the Company to identify the information presented in the Sustainability Report aligns with the description provided in the section "General Information" under the subsection "Results of double materiality assessment" of the Sustainability Report; and
- information provided in accordance with the requirements of Article 8 of Regulation (EU) 2020/852 (the Taxonomy Regulation) in the "Environmental Information" section of the Sustainability Report, under the subsection "Disclosure of Information in Accordance with the EU Taxonomy Regulation".
- compliance with the requirements of the legal acts of the Republic of Lithuania regulating sustainability reporting.

Our conclusion regarding the Sustainability Report does not cover any other information presented together with the Sustainability Report.

Basis for conclusion

We performed the limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) No. 3000, issued by the International Auditing and Assurance Standards Board, (Revised), "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information" (hereinafter referred to as Our responsibility under this standard is described in more detail in the section of this report titled "Practitioner's Responsibility".

We complied with the independence and other ethical requirements set forth in the International Code of Ethics for Professional Accountants (including the International Independence Standards) issued by the International Ethics Standards Board for Accountants, together with the ethical requirements applicable to the limited assurance service we provided for the Sustainability Report in Lithuania.

Our company follows the International Standard on Quality Management 1 (IQCM 1) "Quality Management for Firms that Perform Audits and Reviews of Financial Statements, or Other Assurance and Related Services Engagements", which establishes the requirement for the firm to create, implement, and maintain a quality management system, including policies and procedures related to compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

We believe that the evidence we obtained provides a sufficient and appropriate basis for our conclusion of limited assurance.

Other matters

The limited assurance engagement for the Company's 2024 Sustainability Report, covering the year ended December 31, 2024, was performed by another practitioner who issued an unmodified limited assurance conclusion on this Sustainability Report on May 14, 2025.

Our limited assurance engagement did not cover the comparative information presented in the Sustainability Report for the year 2024. Our conclusion on this matter is not modified.

Management's responsibility for the Sustainability Report

The management of the company is responsible for establishing and implementing the process for identifying the information presented in the Sustainability Report in accordance with ESRS and for providing a description of this process in the section "General Information" under the subsection "Results of double materiality assessment" of the Sustainability Report.

This responsibility includes:

- acquiring an understanding of the context of the Company's activities, business relationships, and affected stakeholders;
- identifying actual and potential impacts, risks, and opportunities related to sustainability issues;
- assessing the significance of identified impacts, risks, and opportunities by selecting and applying appropriate boundaries;
- developing methodologies and formulating reasonable assumptions based on existing circumstances.

Additionally, the Company's management is responsible for preparing the Sustainability Report according to the basis for preparing the Sustainability Report, including:

- the preparation of information in the section "Environmental Information" of the Sustainability Report under the subsection "Disclosure of Information according to the EU Taxonomy Regulation" in accordance with the requirements of Article 8 of Regulation (EU) 2020/852;

- creating, implementing, and maintaining internal control measures that, in the management's view, are necessary for preparing the Sustainability Report without material misstatements due to fraud or error;
- selecting and applying appropriate methods, assumptions, and assessments;
- performing decisions and assessments based on existing circumstances;
- preventing and detecting fraud;
- selecting the content of the Sustainability Report, including identifying intended users and assessing their information needs;
- defining objectives, tasks, and performance indicators, as well as implementing relevant actions;
- overseeing other employees involved in preparing the Sustainability Report.

Those responsible for management are accountable for overseeing the process of preparing the Company's Sustainability Report.

Typical Limitations in Preparing the Sustainability Report

By providing forward-looking information according to ESRS, the Company's management relies on assumptions about possible future events and potential actions of the Company. Actual results may differ significantly from projected results, as future events often unfold differently than expected.

In determining the disclosures presented in the Sustainability Report, the Company's management interprets legal and other concepts characterized by uncertainty. As a result, different interpretations of these concepts are possible.

As described in the "Climate Change: Energy" subsection of the "Environmental Information" section of the Sustainability Report, the quantitative assessment of greenhouse gas (hereinafter – GHG) emissions is subject to inherent uncertainty. Emission factors are estimates taken from recognized sources and based on averages and scientific models, rather than direct measurements of a specific situation. Choosing other acceptable emission factors or calculation methods could result in significantly different emission amounts.

Responsibility of the Practitioner

Our goal is to plan and perform the assurance engagement in such a way that we obtain limited assurance that the Sustainability Report is free from material misstatements due to fraud or error, and to provide a conclusion of limited assurance.

Misstatements may arise from fraud or error and are considered material if it is reasonable to expect that they, individually or in aggregate, could influence the decisions made by users based on the Sustainability Report.

In performing the limited assurance engagement in accordance with the ISAE 3000 (Revised), we applied professional skepticism and made professional judgments throughout the entire engagement.

Our responsibility related to the identification process of the information presented in the Sustainability Report included:

- gaining an understanding of this process, but not for the purpose of expressing a conclusion on its effectiveness;
- assessing whether the identified information meets the ESRS disclosure requirements;
- performing procedures to evaluate whether the process conducted by the Company aligns with its description provided in the Sustainability Report.

Another responsibility we had regarding the Sustainability Report included:

- gaining an understanding of the Company's control environment, processes, and information systems related to the preparation of the Sustainability Report;
- identifying areas where there may be material misstatements due to fraud or error;
- performing assurance procedures in response to identified risk areas.

Summary of Work Performed

Procedures are performed during the limited assurance engagement aimed at obtaining evidence regarding the Sustainability Report. The nature, timing, and extent of limited assurance procedures differ from those of reasonable assurance task procedures, thus the level of limited assurance is significantly lower than that of reasonable assurance.

As a result, we do not express a conclusion of reasonable assurance regarding the Sustainability Report.
The nature, timing, and scope of the selected procedures depended on our professional judgment, including areas where material misstatements due to fraud or error were likely.

In performing the limited assurance engagement, we:

- made inquiries of the Company's employees;
- reviewed internal documents;
- performed analytical procedures;
- conducted detailed testing procedures on selected information based on sampling;
- assessed the compliance of the Sustainability Report with ESRS;

- evaluated the methods, assumptions, and significant estimates;
- assessed the disclosures of the EU taxonomy;
- performed verification procedures on the selected GHG information;
- performed other procedures that we considered necessary in the specific circumstances.

"UAB TaxLink auditas"
Company's audit certificate No. 001494

Arūnas Užbalis
Certified auditor
Auditor's Certificate No. 000543
Sustainability assurance specialist registration No. T000095

Vilnius, Lithuania
25th May 2026

This Limited Assurance Report is signed electronically by the auditor