

AB KLAIPĖDOS NAFTA STRATEGY

2020 - 2030

BRIDGING ENERGY MARKETS



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"It is symbolic that KN strategy 2030 was born on the same year when we were celebrating the 60th anniversary of the company. Human beings of such age usually slow down their pace of life, career and sometimes even begin to consider retirement. Our story is completely different: this and last year we have celebrated many records and key events: Klaipėda LNG terminal performed more than ever ship-to-ship operations, regasified record amount of LNG, attracted a record number of FSRU users, variety of handled oil and petrochemical product grades as well as capacities of oil infrastructure was also historically the highest.

I have no doubt that the significant highlight of the latest years was becoming truly international—KN has signed an agreement to operate and manage the largest LNG to power project in Latin America, port of Acu in Brasil.

Strategy 2030, which we've prepared together with the team and key stakeholders, is also definitely an achievement. I'm proud to see that it is already being implemented from the first day of its draft appearance. And it is the first time when our strategic horizon is so far away from today. There are various opinions and doubts between business leaders worldwide on whether such a long perspective can be forecasted precisely. Especially when the volatility of the business environment where we operate only increases. But I strongly believe that the existence of a long-term core vision and goals creates a lot of advantages and, in opposite, allows us to take proper and timely actions in order to stay competitive, profitable and customer oriented.

Started as an export hub for one grade of oil product sixty years ago, today we are one of the most competitive and innovative energy logistic hubs in Nordic – Baltic region with a strong ambition to expand our LNG business globally. Energy transition, international attention to climate change is already affecting our conventional business areas. In order to remain competitive and to grow, we need to adopt and change. And not only by developing new businesses or improving current ones, we also need to become more sustainable, safe and socially responsible in terms of operations, investments and everything we do. So, this document can be treated as a code or guidelines for balanced change management by ensuring the best value creation for our customers, highest possible benefits to our shareholders, employees and other stakeholders. From the very beginning our purpose was to bridge energy markets, so during oncoming decade we strive to build more bridges for more customers in more continents and in the most sustainable and valuable way."



Darius Šilenskis KN CEO







BRIDGING ENERGY MARKETS

MISSION

KN ensures safe, reliable and efficient access to global energy markets by sustainable development, investment and operation of multi-functional liquid energy terminals worldwide. Our aim is to assist our customers in cleaner energy transition and to maintain their competitiveness.

VISION

Top LNG terminal operator worldwide and most competitive oil and refined products handling hub in the Baltic region.

LNG BUSINESS DEVELOPMENT

We believe that reliable and efficient access to natural gas is fundamental to achieving a sustainable global future energy mix. Natural gas is abundant and once liquefied can be delivered anywhere. The emergence of floating technology based terminals made LNG imports available to diverse clients in new regions and we see this industry-defining trend to continue. We are an established owner and operator of LNG terminals and together with our top-class partner network, we enable broader access to global energy markets by employing expertise and capital into the development and operations of the LNG import infrastructure. We strive to become the preferred partner for new LNG import terminal projects globally and be within the top three leading floating LNG import terminal companies by 2030.





OIL TERMINALS

Due to our services oil refineries can transship, blend and sell their products to the global competitive markets at the best prices and can receive feedstock and/or components for production from anywhere in the world. By 2030 we aim to handle any oil product without limitation of transshipment mode and provide smart throughput, storage and blending services. We aim to be fully capable to work with products that go beyond traditional oil or petroleum products range, i.e. various petrochemicals and bio-liquids. We strive for becoming an oil hub providing full range and scope of services for regional refineries, traders and any other customers by 2030. We care about our social responsibility and climate change thus investing in to sustainable and more efficient technologies and processes. We seek to sufficiently reduce emissions from our activities by 2030.

KLAIPĖDA LNG HUB

Our involvement in LNG activities started from the great ambition to develop an alternative source of energy supply to the Baltic Sea region. Consequently, since 2014 KN operates the first floating LNG terminal in the Nordic-Baltic region. Our strategic goal remains to assure the region's access to the global LNG market at least till 2044. In addition to that, together with partners KN drives local LNG market development by assuring highest quality bunkering and truck loading services as well as contributes to innovation development through the LNG cluster.





ABSTRACT

Changing energy market and acquired new competencies in management of LNG floating terminal in Klaipėda has led to the major change in the Company's vision and mission. From being regional player, providing one type of service, the Company for 2020 - 2030 is targeting to diversify its activities, to expand provided services and be less dependent on one source of income. As a result, the Company will continue to develop three business lines: international LNG projects, crude and refined products handling services, management of Klaipėda LNG floating terminal and small scale LNG reloading services.

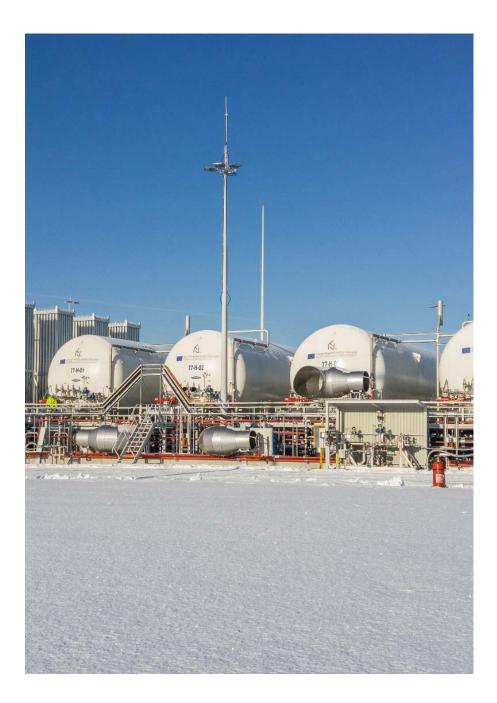
In financial terms, the Company is targeting to increase its yearly net profit more than 2.6 times by Y2030 and implement investments in the range of 320 - 390 MMEUR in the period of 2019 - 2030.

The biggest potential for growth and net profit generation is seen in LNG business development and the Company's main strategic direction is set **towards investment into LNG import terminals internationally.** Natural gas will drive the largest share of the primary energy supply growth in the coming decade globally and LNG will increase its share in the international gas trade. We believe floating LNG import based solutions will underpin close to half of the new regasification capacity in the decade ahead. For KN, 2030 will see net profit from international LNG projects higher than from oil products transshipment services, which is the largest portion today.

Due to increased competition environment and foreseen decrease in demand for conventional **oil products** in the long run, strategy for oil business segment is to expand the range of products that can be handled and increase operational excellence through investing in environmentally sustainable and more efficient technologies and digitization. The increased capacities will enable us to meet changing customers demands and improve the quality of our services. This will also let us increase the list of customers and to change the perception of the object from being just terminal to becoming a hub for handling of refining feedstock, petroleum products, also petrochemicals and renewable fuels from and to any means of transport. These actions should help maintain the same level of net profit received from transshipment of oil products.





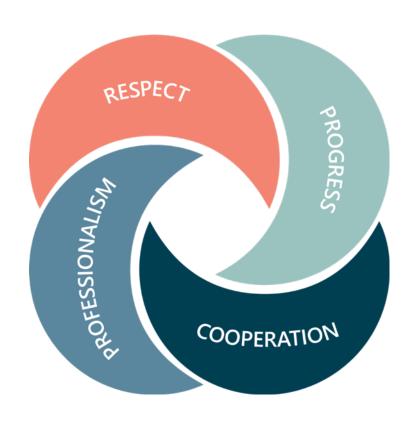


Klaipėda LNG terminal is a complex of on-shore infrastructure and FSRU, the purpose of which is to ensure security and alternative of energy supply, competitiveness of natural gas price regionally. The strategy is to acquire FSRU after Y 2024 ensuring long-term access to LNG import for the country and constantly increase flexibility of the usage of the terminal in order to increase the net value for gas consumers. Strategic goals till 2030 includes acquisition of the most suitable and competitive FSRU solution, gaining of competences and capabilities to operate such terminal independently. We strive to supply region at least with 20 TWh of energy by 2025 and to generate minimum 30% of revenues from international counterparties by 2030.

Investment in **small scale LNG reloading station** is made as a long-term project, anticipating the emergence of demand for LNG from off-grid users, especially from vessels and trucks, in the Baltic States and N. Poland. Increasing pressure to reduce emissions worldwide and fact that LNG is existing, and much cleaner alternative makes this asset very important in KN's portfolio. Our aim is together with strategic partners to encourage LNG market creation and to increase share of this - much cleaner fuel consumption in marine and heavy transport as well as off-grid industry within the region. We strongly believe that by 2025 existing capacities will be fully utilized.



KN VALUES. Four core values underlie how we interact with each other and which strategies we employ to fulfil our mission:



RESPECT

Employees are polite, open, they also respect and honour everyone's diversity, opinion, and job. Furthermore, the people of the Company are socially responsible as well as guided by the principle that reward must be fair and clear.

COOPERATION

Employees help each other by sharing information, knowledge and experience. Members of KN seek a sustainable and common partnership as well as publish the information in accordance with the highest standards of transparency.

PROFESSIONALISM

Employees do their work efficiently and take responsibility for the work/ decisions they make. Moreover, the people of the Company are not only heading for results, but also operate safely and reliably the infrastructure the Company have.

PROGRESS

Employees are open to innovation and make business processes more effective. In addition to this, people are oriented towards environmentally friendly technologies and every day strive to be better than yesterday.



SUMMARY

KN becomes more than a company operating oil and liquefied natural gas terminals in Lithuania. KN is becoming a player in global LNG market by investing accumulated operational and developmental know-how as well as bridging energy markets by enabling our costumers to supply and trade energy resources worldwide.

Our ambition is to switch company initially dedicated for region's energy independence into leading and culture of safety fostering regional oil and LNG hub operator and valued partner for global LNG solutions.







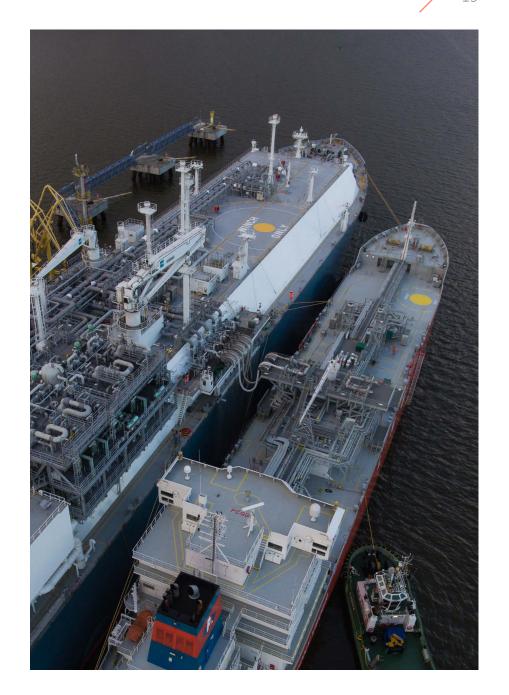
2.1

STRATEGIC GOALS

BUSINESS VISION: to become the preferred partner for new LNG import terminal projects globally and be within the top three leading floating LNG import terminal companies by 2030.

WHAT WE PLAN TO ACHIEVE BY 2030

- A. Operator of at least 5 LNG terminals by 2030
- B. Shareholder in at least 4 LNG terminals by 2030





2.2

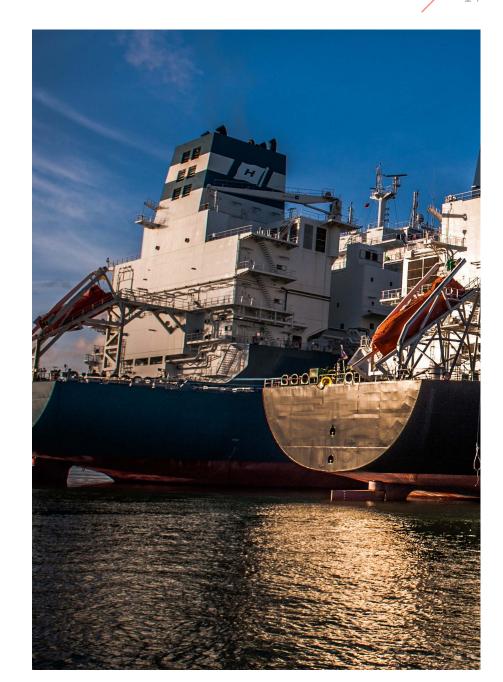
ANALYSIS OF COMPETITIVE/EXTERNAL BUSINESS ENVIRONMENT AND RELEVANT POSSIBILITIES

LNG VALUE CHAIN AND KN BUSINESS

Natural gas is the cleanest burning fossil fuel and a highly cost competitive source of energy. While natural gas is globally abundant, many energy-hungry countries are at considerable distance from the extraction locations.

Due to the technical and economic challenges of transporting gas over long-distance pipelines, natural gas may be turned into liquefied natural gas (LNG) by cooling it until liquid state is reached that is 1/600th of its gaseous state volume. The decrease in volume enables shipping it via the specially designed LNG carriers. LNG is delivered to the import terminals across the globe, where it is stored and converted back to its gaseous state and delivered via gas pipelines to the consumers.

LNG can be delivered to floating or land-based regasification facilities. Floating storage and regasification unit (FSRU) concept was developed in 2005, driven by the need for fast LNG import terminal development. Besides having a shorter delivery time, FSRUs offer lower capital requirements, easier financing and greater flexibility, thus decreasing project risk. KN specializes in development, construction and operations of floating LNG import terminals and associated LNG distribution infrastructure.





KN UNIQUE VALUE PROPOSITION

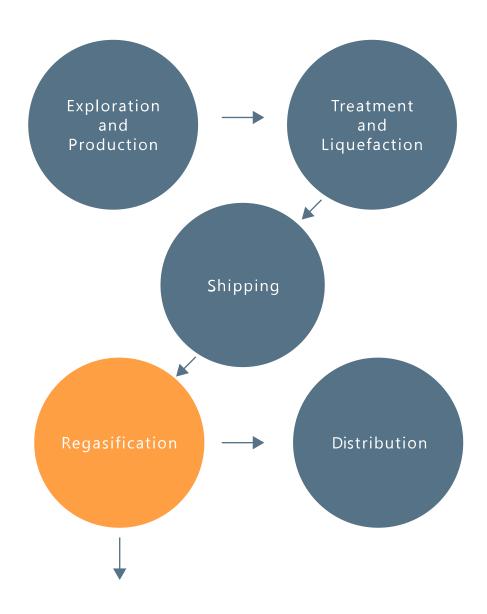
KN draws on the development and advisory experience of more than ten new LNG import projects in Europe, Latin America and Asia since 2015 and has a track record of on-time and on-budget delivery of floating LNG terminal.

KN is among the very few companies worldwide with experience of successfully commissioning floating LNG import terminals on two continents (KN-owned Klaipėda terminal in Lithuania; advisory service to Cartagena terminal in Colombia) also achieving several world's "firsts" and commercial innovation in the industry, including multi-user mode, virtual LNG swaps, continuous small-scale reloads and FSRU integration with on-shore truck loading infrastructure.

KN dedicated LNG business development team and relatively small corporate and organizational overhead allow for streamlined decision making and commercial agility, while retaining the financial strength to drive and complete investment projects.

KN seeks to engage in early stage of the project development and create long term value to shareholders by employing expertise of the overall development and subsequent operations of the floating LNG import terminals. KN is well positioned to capture opportunities in rapidly expanding international LNG import terminal market and shall invest EUR 140 million equity in the next decade, enabled by:

- Experience in developing, delivering and operating FSRU based terminals.
- Innovative commercial models and technological solutions.
- Sound partner network and good strategic fit with floating LNG import focus.





LNG MARKET

Industrialization and electrification of rapidly developing countries is driving global energy demand, expanding by 1,1% annually over the next decade (IEA). Natural gas will be the largest source of growth, accounting for a third of the total primary energy demand additions (Figure 1). Natural gas remains the fastest growing fossil fuel, with energy industry consensus annual growth landing in 1,5% to 2,0% range. The take up of natural gas will largely depend on the global energy and climate policies and its positioning as competing as well as complementing fuel for renewable power generation. Most of this new appetite for gas is attributable to Asia-Pacific and proliferation of gas to power projects in that region.

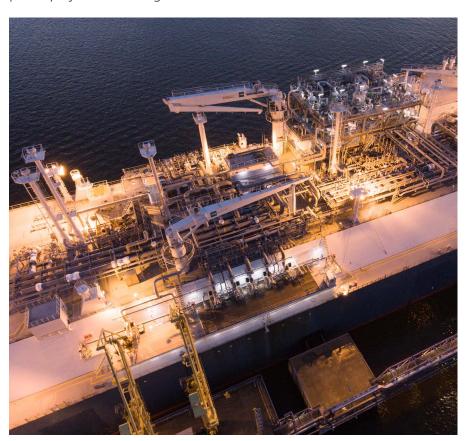


FIGURE 1: WORLD PRIMARY ENERGY DEMAND

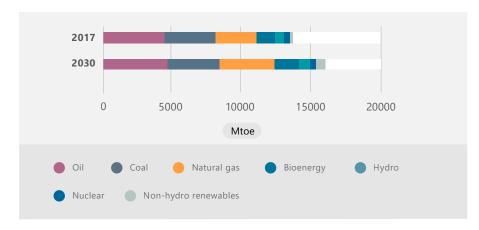
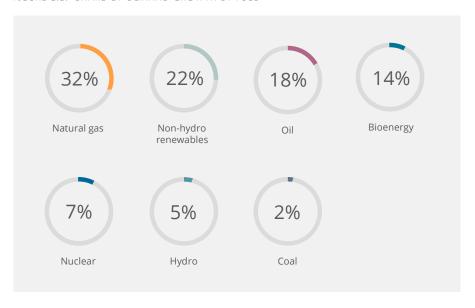


FIGURE 1.1: SHARE OF DEMAND GROWTH BY FUEL



SOURCE: INTERNATIONAL ENERGY AGENCY - WORLD ENERGY OUTLOOK 2018

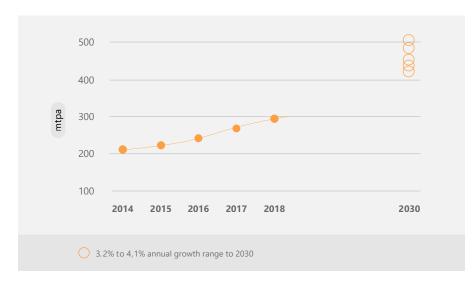


There is an overwhelming consensus that on the back of rising natural gas demand, the international gas trade via LNG shall extend its superior growth further into the next decade and beyond. The annual growth rate for internationally traded LNG lies within a 3,2% to 4,1% range of diverse market commentators,

implying that the global LNG markets will grow by additional 140 to 200 million tonnes of LNG by 2030.

KN sees the LNG import terminal capacity expanding in line with the international LNG trade and new 480 mtpa of receiving capacity added by 2030.

FIGURE 2: LNG TRADE GROWTH



SOURCE: KN INTERPRETATION OF IEA, BP, SHELL, BNEF, IEEJ, GIIGNL





FLOATING LNG IMPORT TERMINALS

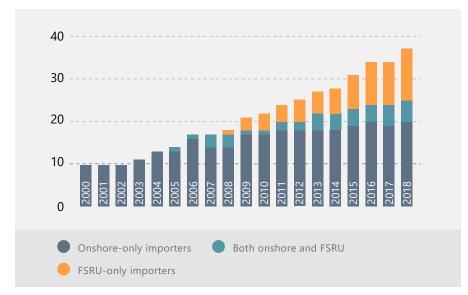
The floating technology based solutions are seen as a major shift that will continue to expand to new markets and accommodate the LNG trade expansion.

The floating technology solutions have unlocked new markets (Figure 3) and gained a regasification market share of 12% since they were first introduced and an industry-changing 46% of total new regasification capacity in the last 5 years,

looking at the period when the principal technological FSRU concept was mature for wider deployment.

The competitive advantage is clearly visible in relatively smaller markets and large markets with multiple efficiently located access points to natural gas transmission system (figure 4).

FIGURE 3: NUMBER OF LNG IMPORTING COUNTRIES

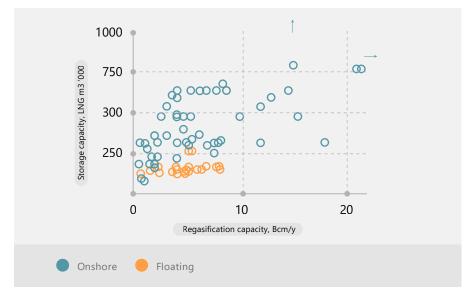


SOURCE: INTERNATIONAL GAS UNION

The increasing liquidity and commoditisation of international LNG trade enables importers to effectively utilise LNG terminals with sendout rates of up to 10 bcm of natural gas per year without the need for major on site LNG storage investments.

Onshore LNG terminals tend to be developed in phases over several years with relatively high initial pre-investment, while increasingly the equivalent result can be met with multiple co-located floating units, reducing the domestic pre-investment requirement and retaining ultimate placement flexibility.

FIGURE 4: TECHNOLOGY OF LNG TERMINALS IN THE LAST DECADE



SOURCE: KN ANALYSIS, GIIGNL



KN sees the cost, speed and flexibility advantages of the floating import solutions allowing the technology to take up close to half of the overall regasification market growth.

KN expects to see additional 50 new floating technology based terminal developments by 2030 (Figure 5), with majority of them served by FSRUs.

As of end of 2018 there were 10 new FSRUs ordered for delivery in 2019-2021 period with a few additional conversions of existing LNG carriers likely to happen within the same period. The principal geographies for new floating LNG import terminals are presented in Figure 6.

One of the defining features of the current floating technology based LNG import terminals is significantly fragmented ownership structure globally, underpinned by local investors in majority of cases. It reflects the historic development of the industry, where relatively concentrated FSRU providers market (with three principle providers) was matched to a newly created LNG import terminal company in each individual case. These companies were predominantly offshoots from local established companies or designated national champions, all of them effectively new to floating LNG industry, developing from scratch and learning-by-doing. The principal reason behind such closed-door approach was the lack of a natural go-to terminal developer and operator.



KN has successfully outgrown its domestic LNG terminal developer's role and is taking position as the best natural partner to develop and operate the local terminal infrastructure of the floating technology based LNG import terminal.

There is a strong trend to open up new terminal developments for external investors and to attract companies with appropriate experience, driven to a large degree by companies with no prior experience in oil & gas (industrial consumers and independent power producers). The competition in this space is limited, as the early adopter companies with experience rarely consider floating technology as strategic focus and KN stands ready to take on the emerging opportunities.

FIGURE 5: NUMBER OF FLOATING LNG IMPORT TERMINALS







SOURCE: KN ANALYSIS, ROLAND BERGER

SOURCE: KN ANALYSIS



EMERGING TECHNOLOGICAL AND COMMERCIAL DEVELOPMENTS

Ongoing developments in technology and new market entrants are bringing on novel LNG import terminal concepts, such as FSjRUs (regasification on jetty) or FRUs (separate floating regasification unit) and wider utilization of floating storage units. This evolution of potential concepts will increase the role of terminal manager that will have to gain specific LNG infrastructure knowledge to operate such equipment, building on the skillset of management and operations of jetty/onshore gas transfer facilities associated with the standard terminal model. In addition to potential shift of regasification operations, there is also a spectrum of new LNG services such as break bulking, bunkering, truck loading as well as integrated LNG to power operations. Considering all the above, the roles and responsibilities of new LNG terminal managers will have to be broadened, cross-integrated and in some cases shared with either traditional FSRU owners or power plant operators. KN first-hand development and operations experience allows to evaluate the potential of such concepts and strengthens the value proposition of KN as the LNG import terminal company.



The overall number and technological diversity of LNG import terminals could be substantially increased by the proliferation of mid-scale LNG import developments. The need is clearly visible with many potential end users demanding less than 1 mpta of LNG, creating geographically fragmented pockets of energy demand. Such customers currently face a relatively high gas price due to higher proportion of regasification cost in the overall supply chain. Economies of scale play differently in such situations and KN envisages standard FSRU terminal projects supplemented with additional technical and commercial innovation that is in active development. The LNG industry is investing heavily into mid-scale LNG carrier and bunkering fleet that will help to unlock these demand pockets.

KN has been involved in a number of mid-scale LNG import terminal projects, including bunkering off-take based opportunities. Seeing that mid-scale LNG market opportunities are on the verge to becoming both technically and commercially viable, KN is well positioned to take part in these developments as developer, investor and O&M provider.



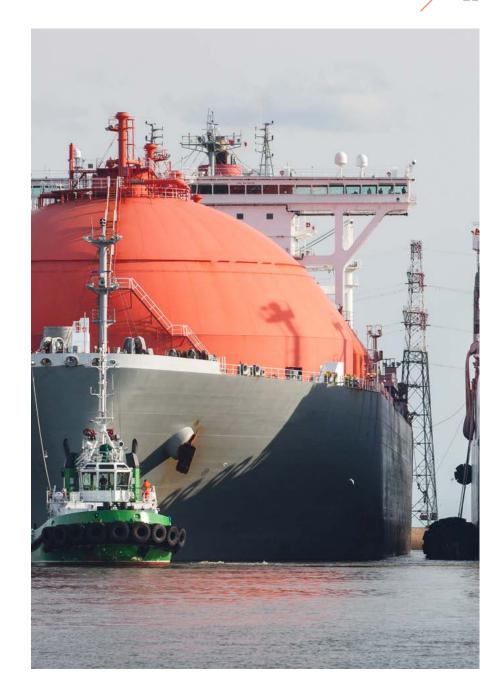
ROLE OF THE LNG IMPORT TERMINAL MANAGER

KN has extensive experience of operations of a multi-user, multi-service, third party access based floating LNG import terminal. The proven ability to provide a wide range of integrated services via a single vessel is key to meeting the diverse challenges in future LNG import projects. In circumstances where KN involvement would not entail capital investment, the operations and maintenance proposal delivers substantial value in itself.

Most value to the client is created when an expert operator is involved from the very beginning of the development of the project, helping to address operability of design solutions, tailoring of operational model and terminal regulations, providing experienced operational personnel, adapting to regulatory framework and setting up terminal user agreements.

Post-development KN offers to take the terminal manager role and provide integrated set of services to the infrastructure owner in relation to technical and commercial operations of the Terminal. These services include operation and maintenance of onshore infrastructure of the terminal, control and supervision of the FSRU operator and its activities as well as commercial operations of the terminal including scheduling, gas accounting, reporting and other activities.

As a result, KN shall become a single point of contact in terms of terminal operations for the terminal owner allowing them to focus on strategic priorities.



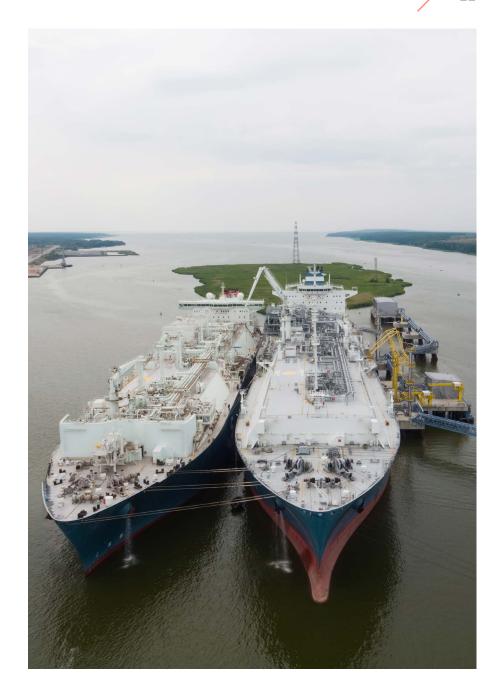


ROLE OF THE LNG IMPORT TERMINAL DEVELOPER

Standard industry practice has formed such that vessels tend to be leased to the LNG import terminal project company by ship owners based on time charter party. This structure ensures that experienced party controls risks related to overall vessel delivery and subsequent operations. The LNG terminal developer has a critical role in ensuring that the vessel is enabled to serve the designated purpose by providing reliable connection to the end user or transmission network. The LNG import terminal developer must ensure the overall management of design, construction and commissioning of mooring solution, natural gas reception facilities, pipelines, regasification equipment (if installed on jetty or shore) and ultimate operational set-up for the life of the asset.

Most of the ship owners focus their strategies on vessel management and remain reluctant to take local infrastructure development roles. KN has the relevant experience and stands ready to set up required project structure, managing construction and operation of the whole or part of the facility, tailoring the solution to specific needs.

Through involvement in a diverse portfolio of projects KN is well aware of varied project failure modes and is ready to acknowledge and manage such risks, minimising impact to spend development capital. The scope of KN investment is predominantly towards the local infrastructure, with cross-investment considerations over shore and floating assets for incentive alignment and risk management.



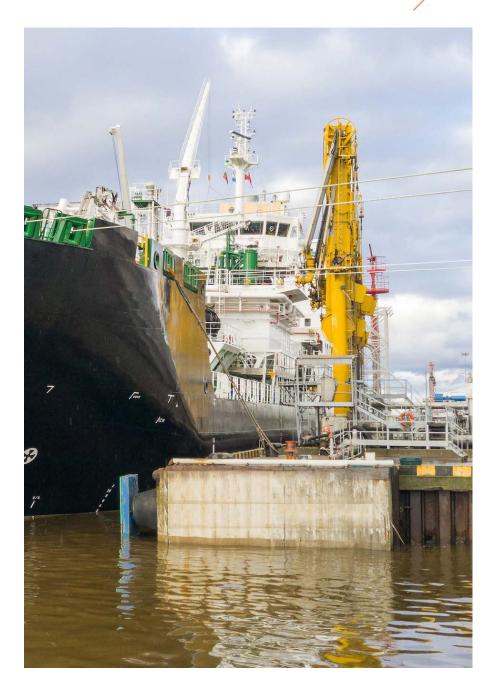


KN INDUSTRY NETWORK REACH

KN has and seeks to further foster the well established relationships with principle company groups representing critical elements of successful LNG import projects. Specialist companies cover aspects such as (but not limited to):

- Principle FSRU owners managing the majority of FSRU vessel fleet as well
 as bringing the most operational experience internationally. KN immediate
 reach to vessel owners enables efficient selection of most suitable concepts
 and fast-track development. KN is looking for cooperation based on best
 possible match and value added to the end client needs of the terminal
 project.
- **Expert EPC companies** that are ready to deliver the most significant part of capital investment, coming from construction of mooring configuration, send-out pipeline and any other auxiliary terminal facilities needed. Such relationships combined with KN experience are key to evaluation of efficient technical concepts, provision of project cost estimates with high degree of confidence and subsequent successful construction and operation management of the whole facility.
- Competitive LNG suppliers and traders, typically representing the largest value exposure for the end users of the new LNG import terminals. In common circumstances such companies are not focused on development and operations of the import infrastructure and KN is seen as a natural partner with the service proposition that is well aligned with their overall strategy.

Flexibility, speed and diligence of KN business development work is held in high regard amongst our partners. Maintaining outstanding reputation and having access to key industry players enables KN to perform at the frontier of the industry and have an opportunity to assess participation in most of the new LNG import terminal developments globally.





SUMMARY: LNG BUSINESS DEVELOPMENT PROJECTS STRATEGY

The growing global LNG market shall add an additional 140 to 200 million tonnes of LNG by 2030, that will in turn require 480 mtpa of new import capacity. KN expects to see 50 new floating technology based LNG import terminals by 2030.

KN has a demonstrated ability to innovate and apply the accumulated experience globally. This specific skillset allows us to engage in early development of new projects and provide safe and reliable operations of floating technology-based LNG import terminals.

Invaluable know-how and top-class partner network provide foundations for KN ambition to become the preferred partner and shareholder in LNG projects worldwide: by 2030 KN aims to operate no less than 5 and be a shareholder in at least 4 LNG terminals.



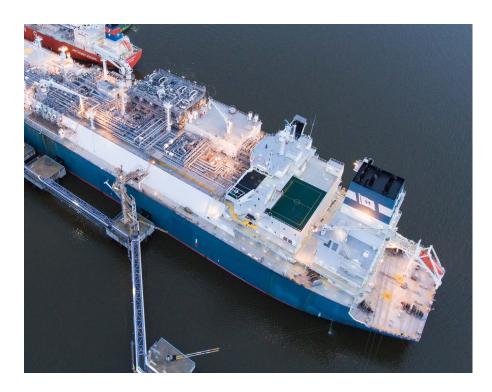




3.1

STRATEGIC GOALS

BUSINESS VISION: to provide access to global LNG markets and competitive gas prices for traders and consumers in the Baltic Sea region and beyond (Poland, Ukraine) and to become the main small-scale LNG import terminal in the Baltic States and Poland.



WHAT WE PLAN TO ACHIEVE BY 2030

A. To become regional LNG hub that increases liquidity and flexibility of the interconnected natural gas systems.

- Ownership of FSRU, full O&M.
- Implemented long term LNG import solution
- >30 % FSRU revenues from international counterparties.
- Provision of quality LNG services under the sustainable business model and for the benefit of the whole region.
- **B.** Profitable small-scale terminal with a proven value in the growing regional small-scale LNG (ssLNG) market.



3.2.

ANALYSIS OF COMPETITIVE/EXTERNAL BUSINESS ENVIRONMENT AND RELEVANT POSSIBILITIES

KLAIPĖDA LNG TERMINAL AS LONG-TERM LNG IMPORT SOLUTION FOR LITHUANIA AND THE REGION

During the development of Lithuania's National Energy Independence Strategy (NES) it was identified that the future of LNG needs to be addressed to determine whether it will continue to be beneficial in future. In pursuing this, the experts from the international company Pöyry Management Consulting selected through an open tender evaluated whether it is appropriate for Lithuania in terms of economic and supply security to ensure long-term import of liquefied natural gas after 2024, when the lease of FSRU Independence expires.

The study concluded that Klaipėda LNG terminal will continue to bring net economic benefits to Lithuania after 2024. Three potential alternatives for securing long-term LNG supply were evaluated: acquisition of the FSRU after 2024; extension of the lease for another 10 years; and extension of the lease for another 20 years.

According to experts, if Lithuania acquires the LNG terminal, it will be able to flexibly react to the unexpected shift in circumstances, for example, changes in natural gas consumption. There would be no such flexibility in the case of lease of the LNG terminal.

In the late 2018 the Government has passed final decisions regarding long-term security of LNG supply by purchasing a FSRU vessel in 2024. In 2019 the European Commission (hereinafter - EC) has split the FSRU acquisition process into two Stages and clarified the state aid for Stage I (reduction of the Security Component). However, it has been indicated that state aid for Stage I has been approved in the context of getting ready for Stage II (the acquisition of the FSRU) and preparation for obtaining another state guarantee in the nearest future. Accordingly, at the end of 2019 Board of KN took necessary decisions regarding implementation of measures for ensuring long-term activities of the Klaipėda LNG Terminal, including principal decision on the FSRU acquisition after 2024 at lowest possible price. At the end of the year Parliament approved state guarantee for Stage I and Stage II which enabled Klaipėdos nafta to sign agreement with NIB on the loan for the purpose of Stage I. As a consequence, Security Component reduction (nearly by almost 42 % since 2020) has been proposed to National Energy Regulation Council (NERC).



OPERATING MODEL OF KLAIPĖDA LNG TERMINAL

Klaipėda LNG terminal is a state regulated infrastructure operating under transparent and open third party – access regime earning a regulated return margin on the approved asset base. Annual charter and running costs of the LNG terminal according to the law are allocated via a security of supply element charged to all domestic gas users in proportion to their annual peak capacity demand. Implementation of state support mechanism through which the costs of the terminal are socialized provides the certainty of revenues that are necessary for long-term operations of this infrastructure.



Part of Klaipėda LNG terminal revenues are collected directly via gas traders and customers by providing LNG storage, regasification for supply into transmission system and LNG reloading services, the tariffs of which are approved by NERC.

Already being an operator of multi-user LNG terminal and provider of full scope infrastructure services – regasification, ship-to ship reloading, cool-down, truck loading, bunkering, transportation, the Company is constantly seeking for innovative solutions to broaden the utilization of Klaipėda LNG terminal and increase the flexibility of using this infrastructure. For example,

an invention of virtual storage model creates possibility for the clients to use terminal services in the scope of one cargo size up to one calendar year without LNG ageing issues or additional monetary fees.

Other commercialization options utilizing FSRU technology with reference to existing market demands are considered as well (ex. LNG-to-power).

In addition to diversified service portfolio, Klaipėdos nafta got opportunity to propose the increase of regasification tariff since 2020, which will impact revenues for regulated activities. Taking into account the regulation by NERC, these revenues will increasingly reduce LNG terminal supplement for Lithuanian end-users. Further rise of FSRU revenues from international counterparties are expected until cost reflectivity principle is finally achieved in 2030. Other measures that aim to reduce payments for Lithuanian end-users include contribution to regional gas market expansion, promotion of natural gas and LNG consumption, constant improvement of terminal's efficiency, working out a model and regulation that would result into fair allocation of terminal related costs.



THE GAS MARKET AND FUTURE DEVELOPMENT IN LITHUANIA AND THE BALTIC REGION

The Lithuanian gas market is liberalized and complies with the unbundling (and other) requirements of the Third Energy Package. Lithuania is connected to its neighbour Latvia, which itself has liberalized since 2017 and has access to its Inčukalns storage facility. In 2020 "Balticconector" connecting Estonia and Finland became operational and by the end of 2021 GIPL will connect Lithuania and Poland.

Whilst gas demand in Lithuania has reduced over recent years, largely due to natural gas being replaced by biomass in district heating, it is now expected to stabilize (consumption of gas rose by 10 % during the first 9 months of 2019). The consumer market is split into the wholesale market (which refers to consumers consuming in excess of 600 GWh per annum) and the retail market. There are 15 large consumers in the wholesale market and over 560,000 consumers in the retail market.

The gas markets in the Baltic States have developed separately over the past few years and have adopted different liberalization and unbundling timescales. Finland, Estonia and Latvia created a regional gas market from 2020, based on a single entry/exit zone with a harmonized entry tariff, two balancing zones (Finland remained as separate zone) and a common Virtual Trading Point (VTP).

Lithuania is considering joining the regional gas market from 2021, if reasonable inter-transmission system operators' compensation mechanism will be reached.

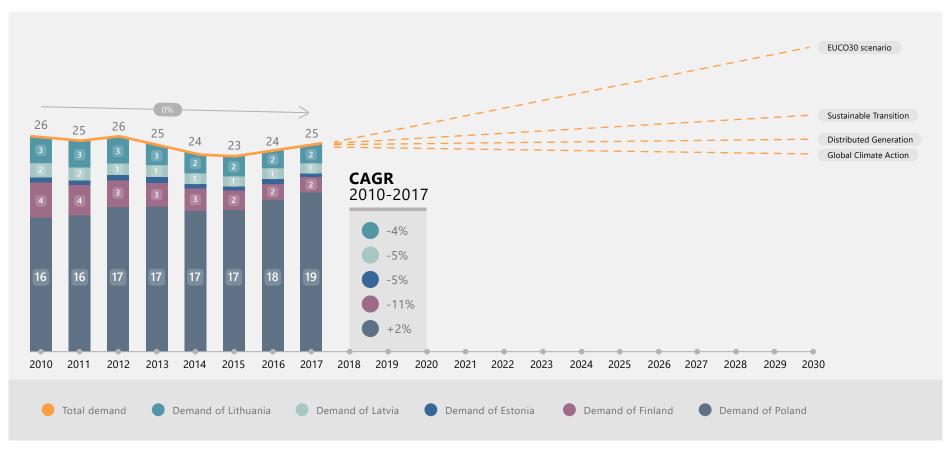




As an interim measure, it is now possible for implicit capacity allocation to take place at the Interconnection Points (IPs) between Lithuania and Latvia as well as between Latvia and Estonia if gas is traded on the GET Baltic exchange.

Taking into account analytical studies about the regional natural gas market several scenarios are drawn which include different energy mix of sources. Considering natural gas market in the Baltic States and Poland, a stable consumption is foreseen (graph below).

SOURCE: BP STATISTICAL REVIEW OF WORLD ENERGY 2018; ENTSO-G; ROLAND BERGER





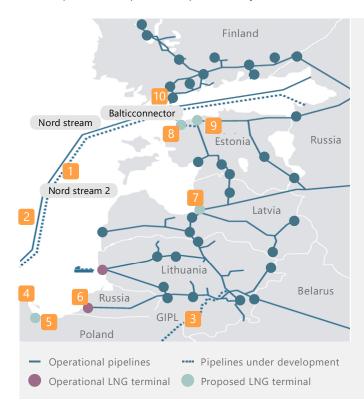
Once Lithuania will joins the regional market, transportation of gas from entry points to offtakes becomes much easier for market participants and should encourage greater liquidity at a single trading point. For example, it will be possible for LNG to be purchased and delivered to a customer in Estonia without incurring transportation charges at each of the national border points.

The commissioning of the Balticconnector between Estonia and Finland in 2020 creates a larger potential market for LNG as it is possible to transport gas from Lithuania to meet gas demand in Finland.

A gas pipeline link between Poland and Lithuania (GIPL) that is planned to be completed and put into operation by December 2021 will create both an

additional gas sourcing option into the region as well as further potential demand for LNG to be shipped to Central Europe. When the pipeline is constructed, new capacities will be created allowing transportation of gas up to 27 TWh a year to the Baltic States and up to 22 TWh a year to Poland, making the gas market of the Baltic States a part of common EU gas market.

There are few infrastructure projects under development, which increase the natural gas supply even further. Despite the fact that some proposed projects will not be implemented, the overall expansion of natural gas pipelines and LNG import terminal hints a perspective oversupply of the regional market (see picture below).



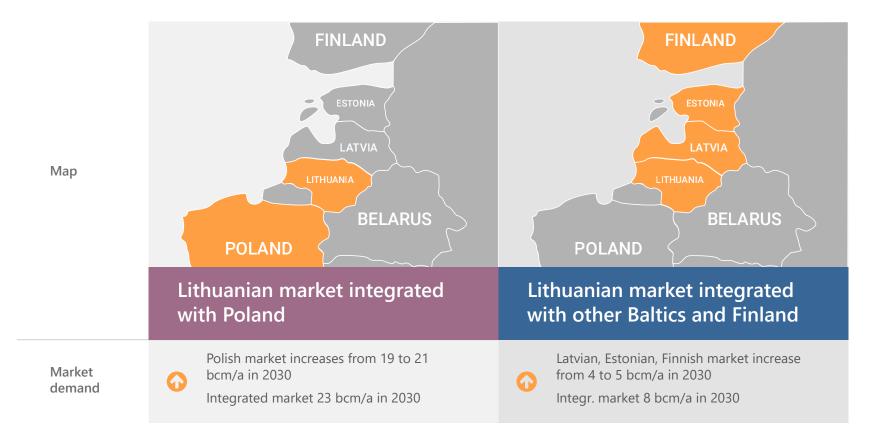
- Nord Stream 2 (under development) 55.0 bcm/a from Russia to Germany
- Baltic Pipe (under development)
 10.0 bcm/a from Norway to Denmark and Poland, or 3 bcm/a from Poland to Denmark
- Gas Interconnection Poland Lithuania (GIPL) (under development)
 2.4 bcm/a from Poland to Lithuania and 1.9 bcm/a from Lithuania to Poland

 1)
- Swinoujscie LNG terminal expansion (operational, but extension proposed)
 Additional storage capacity of 180,000 cu m and 2.5 bcm/a throughput
- Gdansk LNG terminal (proposed)
 Storage capacity uncertain and 4.1 to 8.1 bcm/a throughput
- 6 Kaliningrad LNG terminal (operational)
 Storage capacity of 174,00 cu m and 2.7 bcm/a throughput
- Skulte LNG terminal (proposed)
 No storage capacity planned due to usage of Inčukalns UGS ²⁾ and 1.5 bcm/a throughput
- Paldiski LNG terminal (proposed)
 Storage capacity of 160,000 to 320,000 cu m and at least 2.5 bcm/a throughput
- Tallinn LNG terminal (proposed)
 Storage capacity of 50,000 to 320,000 cu m and 4 bcm/a throughput
- Balticconnector (operational)
 2.6 bcm/a from Finland to Estonia and vice versa



NATURAL GAS MARKET INTEGRATION OPENS NEW OPPORTUNITIES FOR KLAIPEDA LNG TERMINAL

Taking into arising opportunities from Balticconnector and GIPL projects Lithuania is in a good position to bridge new markets. On the other side, the LNG terminal will be able to cover major part of the consumption of the integrated market between the Baltics and Finland. Neighbouring markets are shown in the picture below.



SOURCE: ROLAND BERGER



3.3.

SMALL SCALE LNG AND LNG RELOADING STATION

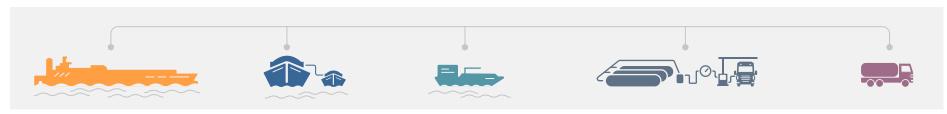
With consistently rising demand of LNG globally as well as regionally, KN made investments in LNG Reloading station thus completing Klaipėda LNG hub (LNG supply chain).

LNG SUPPLY CHAIN AND KN BUSINESS

The Liquefied Natural Gas (LNG) Reloading Station (RS) is a small scale LNG terminal in Klaipėda with the total storage capacity of 5,000 cubic meters. LNG RS is dedicated to **provide truck loading services** for land-based distribution in the Baltic countries and North-Eastern Poland as well as **LNG bunkering services** for the vessels powered by LNG.

From the start of operations in 2017 reload volumes are constantly growing. Successful operation of infrastructure and appearing market potential allowed us to attract one of the key region's player PGNiG as a partner. PGNiG has booked capacities of LNG RS for 5 years since 2020.

FIGURE 1. FULL LNG SUPPLY CHAIN IN KLAIPĖDA





REGIONAL SSLNG BY TRUCKS MARKET IS IN EARLY STAGE

Regional small scale (Estonia, Latvia, Lithuania and Poland) LNG to trucks market is estimated to be ~200.000m³ in 2019, out of which 35.000m³ is Tallink's Megastar's bunkering volumes and 140.000m³ are supplies for the off-grid consumers in Poland (mainly FMCG factories, district heating companies and industries). Baltic in-land market size is less than 15.000m³ and insignificant growth potential is presumed due to well-developed gas grid coverage. Baltic in-land market size currently is about 15.000m³, thus growth potential is presumed due to market's early stage.

New developments are observed in LNG as fuel segment, as players develop LNG fuelling stations (few in the Baltics, and tens in Poland). LNG as a fuel applications might be driving the growth in upcoming years (Figure 2). Bunkering by trucks operations are being started in Poland, however more likely that most of such operations will be done as ship-to-ship due to this method to be more efficient.

FIGURE 2. REGIONAL SSLNG DEMAND

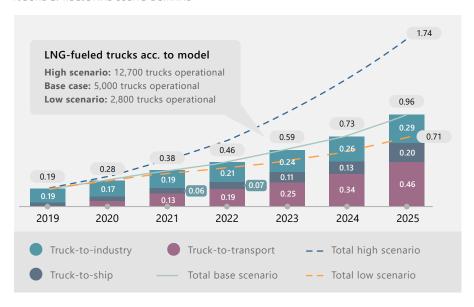
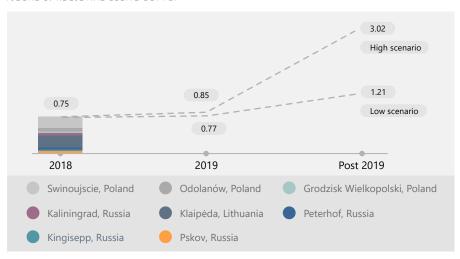


FIGURE 3. REGIONAL SSLNG SUPPLY



SOURCE: ROLAND BERGER, KN



LNG BUNKERING IS KICKING-OFF IN THE BALTICS

In regards to maritime sector, since the establishment of MARPOL 73/78 regulations (Annex VI), International Maritime Organization (IMO) sets limits on NOx and SOx emissions from ship exhausts, and prohibits deliberate emissions of ozone depleting substances, which encourages Emission control areas (ECA) seek for alternative fuel solutions. As North and Baltic Seas have highest maritime traffic in the world, established ECA zones enhanced shipping with LNG propulsion as one of the cleanest alternative (Figure 4).

FIGURE 4. COMPLIANCE METHODS FOR IMO REGULATIONS

| Complianc | e Methods | SOx | NOx Tier II | NOx Tier III |
|-------------------------|--------------------|-----------------------|-----------------------|---|
| | Low Sulphur Blends | YES | With other techniques | With other techniques |
| | Distillates | YES | With other techniques | With other techniques |
| On-board abatement | Dry Scrubber | YES | With other techniques | With other techniques |
| technologies | Wet Scrubber | YES | With other techniques | With other techniques |
| | IEM | With other techniques | YES | NO |
| | Water methods | With other techniques | YES | NO |
| Combustion Modification | EGR | With other techniques | YES | Depends, only on two-stroke low-speed engine and other techniques |
| | SCR | With other techniques | YES | YES |
| | LNG | YES | YES | YES |



The biggest challenge for maritime industry is IMO's global 0.5% fuel sulphur content cap regulation that is enforced from 2020. First couple of years will be marked with a switch to low sulphur fuel oil and increase of scrubber usage, but with a growing number of new built LNG driven vessels the LNG share should increase consistently. Nevertheless,

in the long term, LNG is the economically and technically most viable solution as maritime fuel in regards to sustainable environment.

In order to fasten the transition towards clean fuels, the European Commission promotes EU wide programmes, which provide co-funding for investments in LNG technologies such as LNG equipment and infrastructure.





ACTIONS TO BE MADE

Business environment is rapidly changing, and there are strong arguments in favour of significant market growth in upcoming five years. Therefore KN shall continue growing its market share and make impact by improving business environment. At the same time,

KN maintains flexible strategic approach towards increasing market opportunities and takes respective measures allowing to increase utilization and operational excellence of the small-scale terminal.



- 1. Generate revenues from long-term agreements to small-scale terminal by upstream partnering with strong players in the market, who could ensure stable supplies to the reloading station on competitive prices, as well as would have large downstream market reach (existing clients and proven market development ambitions).
- **2.** Become effective and efficient terminal for the partners, being available when necessary and capable to do significant number of loads.
- **3.** Continuing using all possible measures to make LNG RS even more attractive to customers. Improving business environment in Lithuanian LNG market by continuing spreading awareness in the market, cooperating with institutions and other players, promoting LNG-in-favour legislation, cooperating with Port Authorities to improve bunkering conditions and start bunkering operations in the Port of Klaipėda.



SUMMARY: KLAIPĖDA LNGT BUSINESS STRATEGY

Decision to maintain operations of Klaipėda LNG terminal at least till 2044 and new connections with neighbouring markets enables Lithuania to become significant part of regional natural gas ecosystem.

Together with small-scale LNG terminal, Klaipėda LNG hub completes LNG value chain which ensures achievement of strategic goals, such as competitiveness, operational excellence and value creation for gas consumers.

Innovative operation and management of these strategic assets enhances accumulation of core competences and knowledge for our global LNG growth.







4.1.

STRATEGIC GOALS

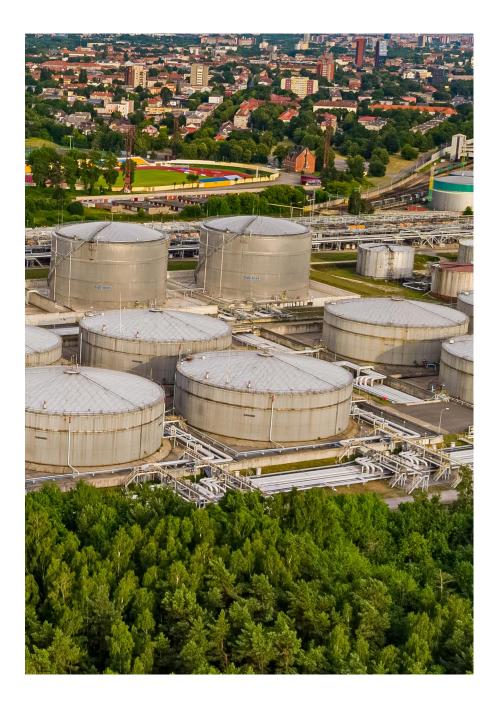
BUSINESS VISION: region's top and most efficient oil throughput and storage hub of liquid petroleum, petrochemical products and refining feedstock for regional and global refineries, traders and other customers by 2030.



Oil business strategy – is to ensure high rate of profitability and attractiveness for customers through:

- Sustainable implementation of investment infrastructure projects with the purpose to maintain competitiveness in changing market (best available technology reflecting market demand and processes efficiency, less emissions from operations and energy consumption).
- Gaining competitive advantage from provision of additional services after infrastructure's modernization and expansion.
- Our aim is to create additional value for our customers within terminal by providing more attractive and complex services in one hub.
- Further enhancing focus on operational excellence by implementing automation and digital measures.
- Continuous investment into safety measures and applying highest market standards for safety.





WHAT WE PLAN TO ACHIEVE BY 2030

- **A.** Sustain and increase volumes and profitability of oil terminals under consideration of changes to the market structure
 - 46 MMEUR revenue
- **B.** Enter market for transshipment of petrochemicals and other new products
 - 12 % share from overall oil business revenue
- **C.** Ensure environmentally sustainable activities of KN oil infrastructure
 - Full compliance with environmental regulations and reduction of emissions
- D. Ensure secure, reliable and efficient operation of oil terminal
 - No critical accidents



STRATEGIC DIRECTIONS OF OIL BUSINESS:

Increase flexibility and capacity of oil and petrochemicals transshipment in order to ensure growth and maintain competitiveness.

Investment into expansion of storage capacity allows us to to increase a number of clients and gives opportunity to diversify products portfolio.

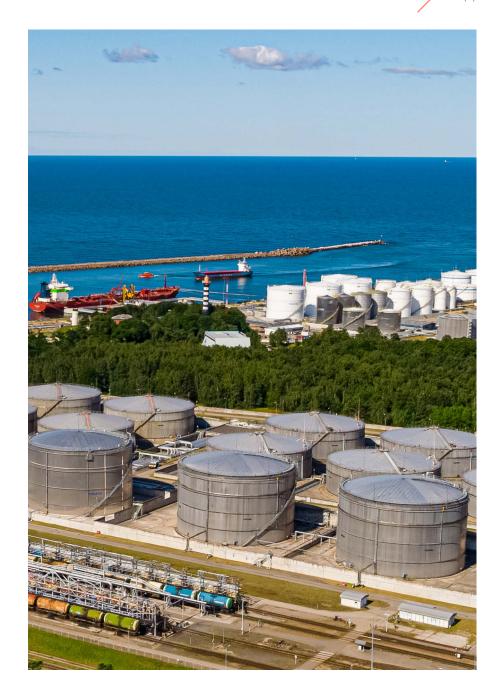
After completion of investment program by 2023 KN will further improve competitiveness and abilities to load even more grades of different products, to existing VGO, different grades of fuel oil, bunker fuel, light petroleum products, alcohols and other renewable fuels.

Also, new railway trestle and third jetty enable us to handle octane boosters, liquid petrochemicals, alternative feedstock for refineries, bitumen and other products which will appear in a market after the completion of on-going modernization programs in closest oil refineries.

Additional services (such as oil products bunkering, blending, short term storage and other) will enlarge number of potential customers and expand business opportunities for existing customers.

Digital solutions and investment into automation will contribute to competitiveness, extra savings and quality of the services to the customers.

Safe operations is a top priority for the company. Therefore, KN will continue investing into safety and environmental protection programs.





4.2.

ANALYSIS OF COMPETITIVE/EXTERNAL BUSINESS ENVIRONMENT AND RELEVANT POSSIBILITIES

The main purpose of Klaipėda oil terminal is to provide the services of transshipment (transfer from/to tank wagons/oil carriers) petroleum products supplied from/to Lithuanian, Russian, Byelorussian and other oil refineries and of the products' storage in the storage tank fleet of the terminal. In addition,

the terminal enables its customers to import petroleum products and refining feedstock.

Looking forward, oil refineries of the region are facing changing market demand and refining margin structure. Due to this refineries actively modernize oil-refining processes in order to remain competitive. In line with such modernization,

oil refineries increase yield of light petroleum products (gasoline and etc.) and potentially increase exported oil product quantities.

These modernization actions are seen as growing possibilities for KN oil terminal.





Changes of IMO requirements for bunkering market also requires more infrastructure to meet increasing variety of handled products.

Additionally, the Company is responsible for performing long-term fuel storage service at Subačius oil terminal. The main users of Subačius oil terminal are State enterprise Lithuanian oil products agency (LNPA) and local oil refinery. In accordance with the Law on LNPA, the State must have a reserve of petroleum products meeting the needs of average consumption for 45 days.

Taking into consideration current forecasts, quantities of State petroleum products will increase by app. 245 thousands tones until 2024. As a result, there is a possibility for the expansion of storage services in Subačius oil terminal.

When global demand for HSFO in bunkers drops by almost 3 mbbl/d due to IMO regulation in 2020, other dark fuel oils fill the gap

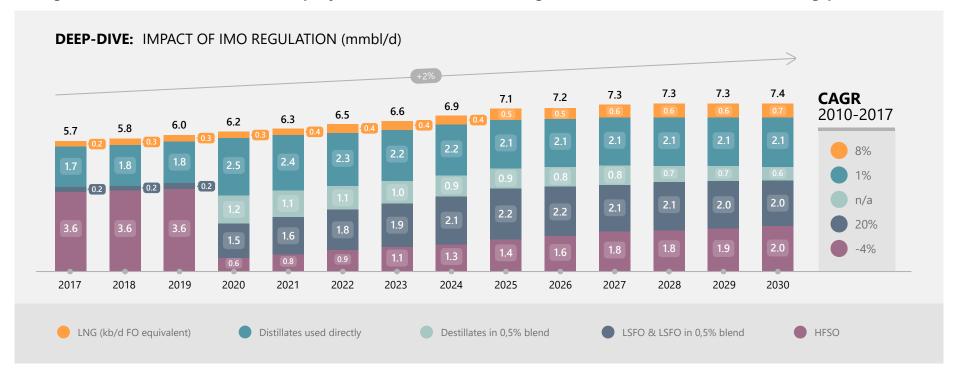


FIGURE 4. CHANGES IN PRODUCT PORTFOLIO AFTER IMO 2020



ACTIONS TO BE TAKEN

In order to be ready for future changes in oil business environment and have sustainable and decent level of profitability, KN oil business has to focus on infrastructural and operational projects which correlate with the increase of terminals' infrastructure flexibility and effectiveness of operations. At the same time, KN shall ensure safe operations of the oil terminal through implementation of work safety and the environmental protection measures.

- Sustain volumes and profitability of oil terminal through continuation of business with current main customers;
- Increase volumes and variety of products portfolio from Belorussian refineries through enhanced competitiveness compared to other market players;
- Enter market for handling of liquid petrochemicals, alternative refining feedstock, octane boosters and other refined products;
- Finalize investment program, which will unlock opportunities to provide additional services for clients such as bunkering operations, products blending and ship to ship loading services to meet changing market needs for more complex and variable final product specifications and etc.;
- Further explore market in a light of possible changes for other business opportunities.





SUMMARY: OIL BUSINESS STRATEGY

During 60 years of operation KN has gained strong reputation and market awareness as competent and reliable partner for oil handling related services.

For the next decade, KN oil business mainly will be focused on continuation of sustainable investment, innovative solutions, improvement of operational excellence and ensuring environmentally sustainable, safe and reliable operation.

Till 2030 we will enter new product markets and become fully capable to meet changing demand of our core customers, provide wider scope of services and to establish solid competitive advantage.





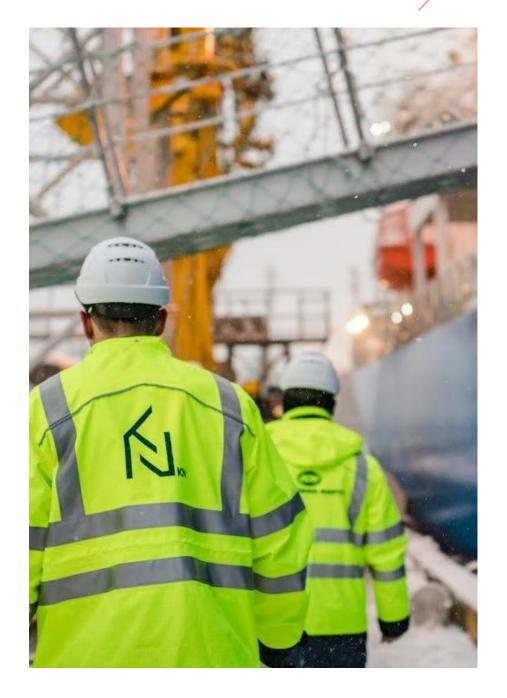
People are the key asset of our company and they are always at the centre of our performance with technology. We believe that professionals with necessary high competencies, whether it is technical or management, are vital to our success. People are attracted, motivated and retained as part of KN team because they enjoy company's culture that empowers them to achieve results, enables their personal growth, constant progress, offers fair and competitive compensation package and allows them to feel pride in creating independence and making a difference for countries through bridging energy markets worldwide.

We are a value-based company and we work in accordance with respect, cooperation, professionalism and progress. Our values govern the way we work anywhere in the world, what we expect from ourselves, colleagues, clients, top management and other key stakeholders of the company.

We aim to be fast learning, open minded professionals possessing excellent project management skills. Our flexible, innovative, multilingual and multicultural teams will be spread across the globe and made up with inspiring and self-driven leaders in any management or specialist and expert role.

In line with the pace of the international LNG projects development, we will increase number of experts in the key competence areas. Therefore, we will proactively plan for and ultimately draw on the increase in geographical, cultural and linguistical diversity of our people.

In order to have effective organizational structure and efficient teams of employees ready to fulfil promises made to our clients and key stakeholders, the Company will implement People related strategy by achieving goals which are described in detail in the following table:





PREPARING FOR GROWTH To attract additional managers and specialists in time for the Global LNG Balanced workforce and succession plans in place, ensuring business continuity program in all terminals and support units To ensure timely and adequate changes of KN culture, organizational structure • Culturally, linguistically and geographically diverse teams cooperate well and processes together making diversity a strong, united competency of KN **CREATE AND RETAIN CAPABILITIES Learning** culture – **investment** in learning **Reviewing / Sustaining** skills required for business Transform and sustain **organizational culture** (how people behave) Transform / Sustain Have **Agile leadership team** who are coaches and inspire employees **PEOPLE MANAGEMENT** Have management by mission in place not only management by objectives • People feel and act as **owners and ambassadors** of the company to bring up ownership feeling and fully open up people's potential Competitive pay to create/attract and retain capabilities with orientation for • Orientation for 50 - 90 percentile of Hay group - Employees in LT with LT average and above quartile market, Employees abroad - with international market Attractive employer brand with a mission (to attract new employees) • Recognizable globally Inspiring and empowering **People experience** through KN employee journey





Communities all over the world strengthen their focus on direct and indirect business impact on the society. In order to be successful and responsible members of the society in the long-term perspective, all companies shall adhere to principles of business sustainability. Following from that, KN considers social responsibility as a key principle of its operations and develops its business according the following guidelines:

ECONOMIC RESPONSIBILITY

The Company focuses on a **win-win** growth. It means that we responsibly develop business by creating value for shareholders, society and the state. We seek business returns, that meet the industry standards, following strictly defined dividend policy. We understand the role of our activities in contributing to sustainable economic growth in the regions where we are operating through taxes, employment policies, education initiatives, business innovations and etc.

TRANSPARENT AND ETHICAL **BUSINESS PRACTICE**

The Company complies with the **highest business management standards**, transparently shares information about business operations and strategy with its stakeholders. The Company also follows all relative legal acts, principles and rules both locally and globally. Zero Tolerance for Corruption Policy is implemented in the Company. All levels of employees, including Board and Supervisory Board, strictly follow Company's Code of Conduct.

ATTRACTIVE EMPLOYER

The Company provides a working environment that meets the strict standards of safety at work and well-being of its employees. We foster such an environment, where every employee is treated equally, respected and allowed to reveal their potential.

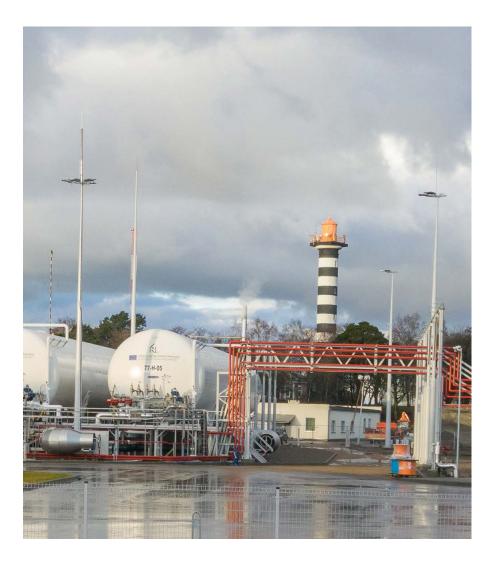
SUSTAINABLE PARTNERSHIPS WITH CLIENTS

We develop long-term relationships with the clients, focusing on the best possible end-results for them. In cooperation with all its stakeholders the Company adheres to the principle of ethical competition.

ADVERSE COMPANY IMPACT

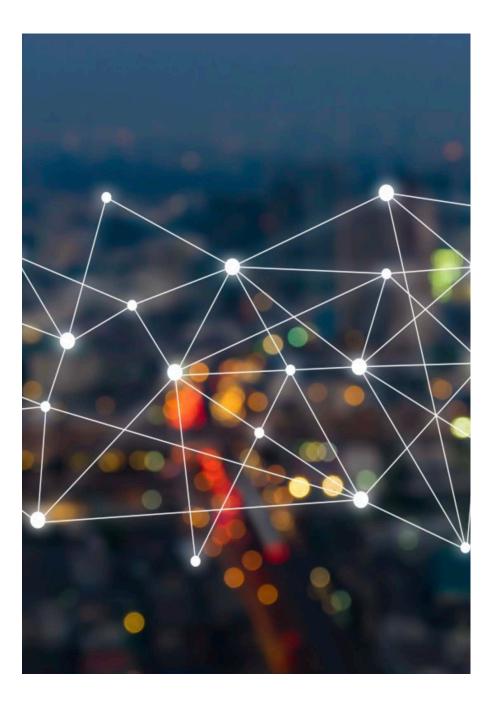
MINIMIZING AND PREVENTING Goal of the Company is to avoid, mitigate and manage our environmental and social impacts of our operations. We aim to be both good neighbour and member of the society, taking care of interests of the communities that are directly or indirectly affected the Company's **activities.** We feel responsible for the environment where we act, therefore we aim at minimizing adverse Company's impact on the environment.

KN aims at following and adhering to the internationally recognized guidelines for CSR as well as sustainable development goals.









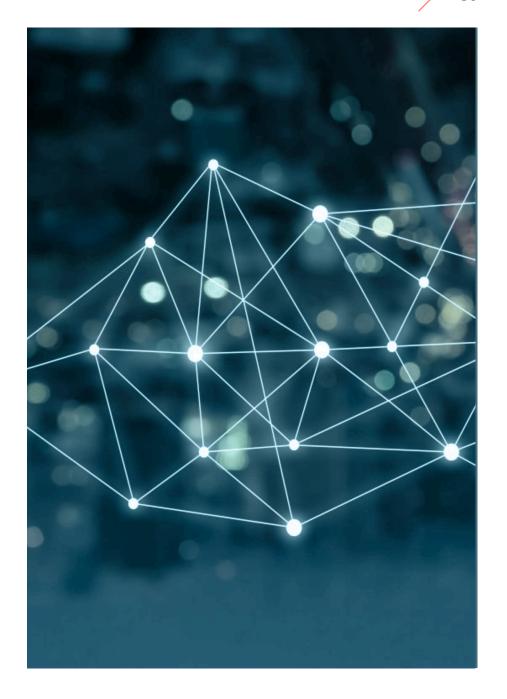
In light of future growth of the efficient and safe operations of oil hub and LNG terminals as well as new projects development, KN will require new ways of working, better data on the status of various processes, smart, more powerful and complex tools for turning data into knowledge, informed decisions and added value services to our clients.

In 2019 KN and its partners established Baltic Maritime Digital Innovation Hub which aims to become a digital innovation support platform that helps companies, institutions and organizations in the region of Klaipėda to create added value through digital technology, better business and production processes.

During the year 2018 the Company created the team of volunteers (KN innovators) who prepared digitalization strategy. The main purpose of digitalization strategy is related to the strategic and systematic view encompassing major digitization and innovation directions of KN activities which shall be integrated into KN business strategy and support the achievement of business goals. Each direction in the strategy is defined for the 2-3 year period and shall be executed on the basis of Objective and Key Results (OKRs) methodology. KN established six directions for the implementation of KN Digital and Innovations strategy. First year's aim is to focus on the low hanging fruits and quick wins.

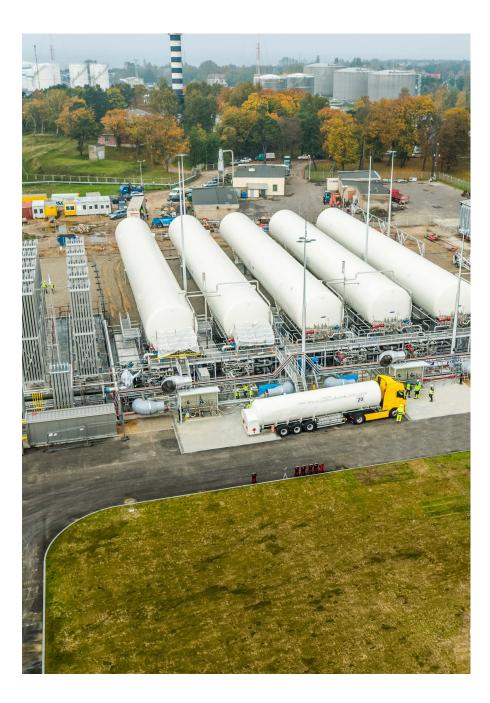


| DIRECTION | VISION OF THE DIRECTION |
|---------------------------|---|
| E-PROCESSES | Transparent, understandable, manageable and constantly optimised business processes of KN |
| E-DOCUMENTS | Become a paperless office and provide paper-free service |
| E-COMMUNICATION | A virtual community where information is shared and available in real-time |
| DIGITAL TWIN | Technological processes and state of the technological equipment reflected in the digital model, helping business to plan activities and business changes before making decisions |
| BUSINESS INTELLIGENCE | Business decisions are real-time data analytics-driven and based on the proactive evaluation of a rapidly changing environment |
| INNOVATIVE ENVIRONMENT | KN is a constantly learning, attractive organization open for digital technologies and innovations |









The company is planning to triple its net profit from 13,2 MMEUR (adj.) in 2019 to 35.3 MMEUR by 2030.

The company's ambition is to invest up to 320-390 MMEUR within strategic horizon of 2019-2030.



| AB KLAIPĖDOS NAFTA P&L STATEMENT, MM EUR | 2025 | 2030 |
|--|------|------|
| EBITDA | 55,2 | 68,7 |
| Net profit/loss | 20,3 | 35,3 |

^{*} Adjusted result, recalculated excluding change in IFRS 16 standard. Ratios for 2025 and 2030 are calculated with applied IFRS 16 standard change.

AB KLAIPĖDOS NAFTA MAIN FINANCIAL RATIOS AND CASH FLOW STATEMENT

| AB KLAIPĖDOS NAFTA FINANCIAL RATIOS | 2025 | 2030 |
|-------------------------------------|------|-------|
| ROE | 9,3% | 13,2% |
| ROA | 3,4% | 6,3% |
| Equity ratio (E/A) | 49% | 62% |

^{*} Adjusted result, recalculated excluding change in IFRS 16 standard. Ratios for 2025 and 2030 are calculated with applied IFRS 16 standard change.



The purpose of this document is to present the strategy of AB Klaipėdos nafta, which is based on ambitious objectives, related to the growth and development of the company. However, this document shall not provide guarantees regarding the implementation of the objectives or any other act set forth herein, and we hereby note that:

- The making and implementation of specific decisions to achieve the objectives set out in this document (including the scope, timing, and other aspects of the development) will depend on the specific external and internal economic, legal, and other factors that may influence such decisions and their effective implementation, focused on successful results and the creation of value for all stakeholders;
- The individual business guidelines stated in this document (including possible projects, development opportunities, alternatives) shall not be construed as a commitment or other final decision or offer to invest, enter into transactions or take any other action.
- Any specific decision will be taken only after consideration of all the relevant circumstances and in accordance with the requirements and procedures of the law, including, where applicable, the obligation to obtain the necessary permits or any other coordination with the competent authorities or interested parties;
- Information on specific decisions, if required to be disclosed, will be disclosed in accordance with the requirements of the legislation governing the public disclosure of such information and ensuring that interested parties are provided with adequate, sufficient and complete information and the implementation of the principles of transparency;
- The information stated in this document may not be construed as an investment or other recommendation related to trading or activities in the relevant markets or otherwise seeking to influence participants in the relevant markets or other potentially interested parties;
- The information stated in this document is prepared under the circumstances known at the time of writing and is subject to change in the future.

- AB Klaipėdos nafta is not responsible for any conclusions that may be drawn by other persons after reading this document and assumes no liability for any loss that may result from the interpretation or guidance of the contents of this document;
- The company adheres to the principle of legality of its operations and therefore any objectives, plans, statements, concepts and other information contained herein may not be construed as contrary to the requirements of the law.

