



# Code of Ethics of Ignitis Group

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# Statement by the executive



We have defined in Ignitis Group Strategy 2030 **WHAT** we do in the long term: we aim to become a globally competitive energy company creating value for Lithuania. In this Code of Ethics, we agree on another important issue: **HOW** we do that.

We are ambitious. We strive for leadership in the global energy market through our actions, responsibility and transparency. I am convinced that this is the only way to stand out and to maintain the trust of all stakeholders in us, which is necessary for successful operation.

A number of priorities sit behind the firm foundation of the organisation's values: equal opportunities for employees, creating a culture of improvement, open and fair market participation, responsibility and transparency, partnership and cooperation with local communities and organisations, and with society as a whole.

This Code sets out the principles that provide a clear understanding of what our shareholders, partners and the society can expect from the employees of Ignitis Group companies, and what its employees can expect from the organisation.

Dear colleagues, let us be guided by this Code and share it with others. Let it become a vital part of our organization's culture and daily activities.

A handwritten signature in black ink, appearing to read 'Darius Maikštėnas'.

Darius Maikštėnas  
Chairman of the Board and CEO  
Ignitis Group

# Application of the Code



This Code of Ethics (hereinafter – the Code) defines the principles and standards of business ethics and conduct followed by Ignitis Group companies and expected from our employees in their daily work.



The Code is applicable to all the companies within Ignitis Group, which hereinafter are collectively referred to as the Group. We apply the Code to all employees and members of the supervisory and management bodies of the Group companies, irrespective of their position, company or country they work in, and to the business partners of the Group (the term ‘business partner’ is defined in the Group Anti-Corruption Policy).



This Code helps employees to manage their conduct in accordance with the expectations of the Group. The Code delivers to all our stakeholders the principles of ethical and responsible conduct followed by the Group companies in their business practices and reflects what is expected from our business partners.

# Values

In our vision, we transform for a more sustainable world.

In everything we do, we are united by the mission to make the world more energy smart.

Each day we develop energy solutions that work ever better, smarter and more conveniently. Responsibility, partnerships, openness and growth is what unites, motivates and inspires us. The principles of our ethical conduct, which are described below, are based on these values.



## RESPONSIBILITY

Care. Do. For Earth.  
Start with myself.



## OPENNESS

See. Understand. Share.  
Open to the world.



## PARTNERSHIP

Different. Strong.  
Together.

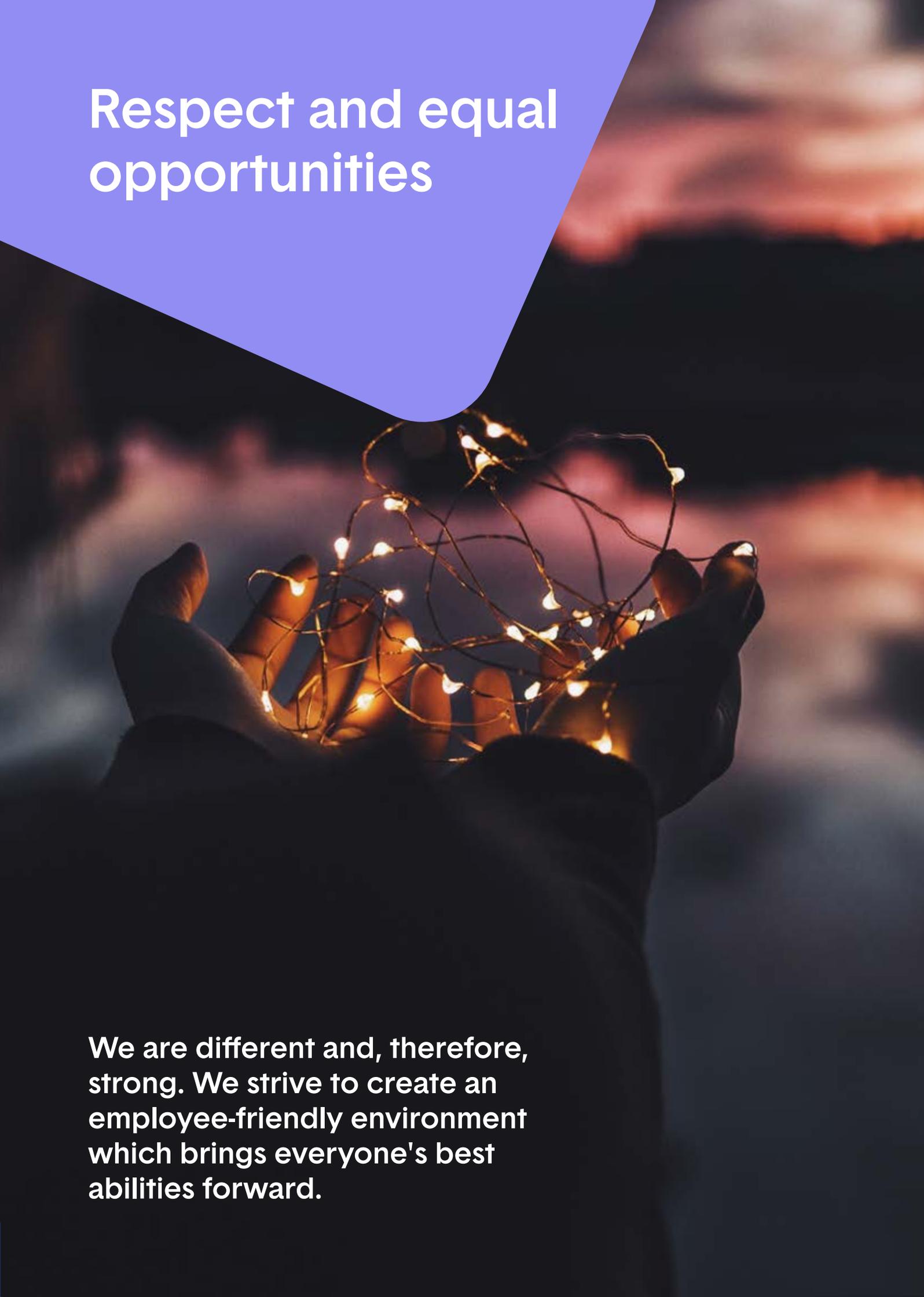


## IMPROVEMENT

Curious. Bold.  
Everyday.



# Respect and equal opportunities

A pair of hands is shown from the bottom, cupping a tangled string of warm white lights. The lights are glowing and creating a bokeh effect in the background. The top left corner of the image is a solid blue shape that contains the title text.

**We are different and, therefore, strong. We strive to create an employee-friendly environment which brings everyone's best abilities forward.**

## We ensure respect for human rights

We respect and protect human rights and freedoms, recognised in national and international legislation, we disseminate and foster democratic values in accordance with the guidelines set forth in the Universal Declaration of Human Rights and International Labour Organization Conventions (including conventions on the worst forms of child labour, maternity protection, etc.).

We demonstrate good will and mutual trust with our words, actions and proposals and create an employee-friendly and conducive work environment.

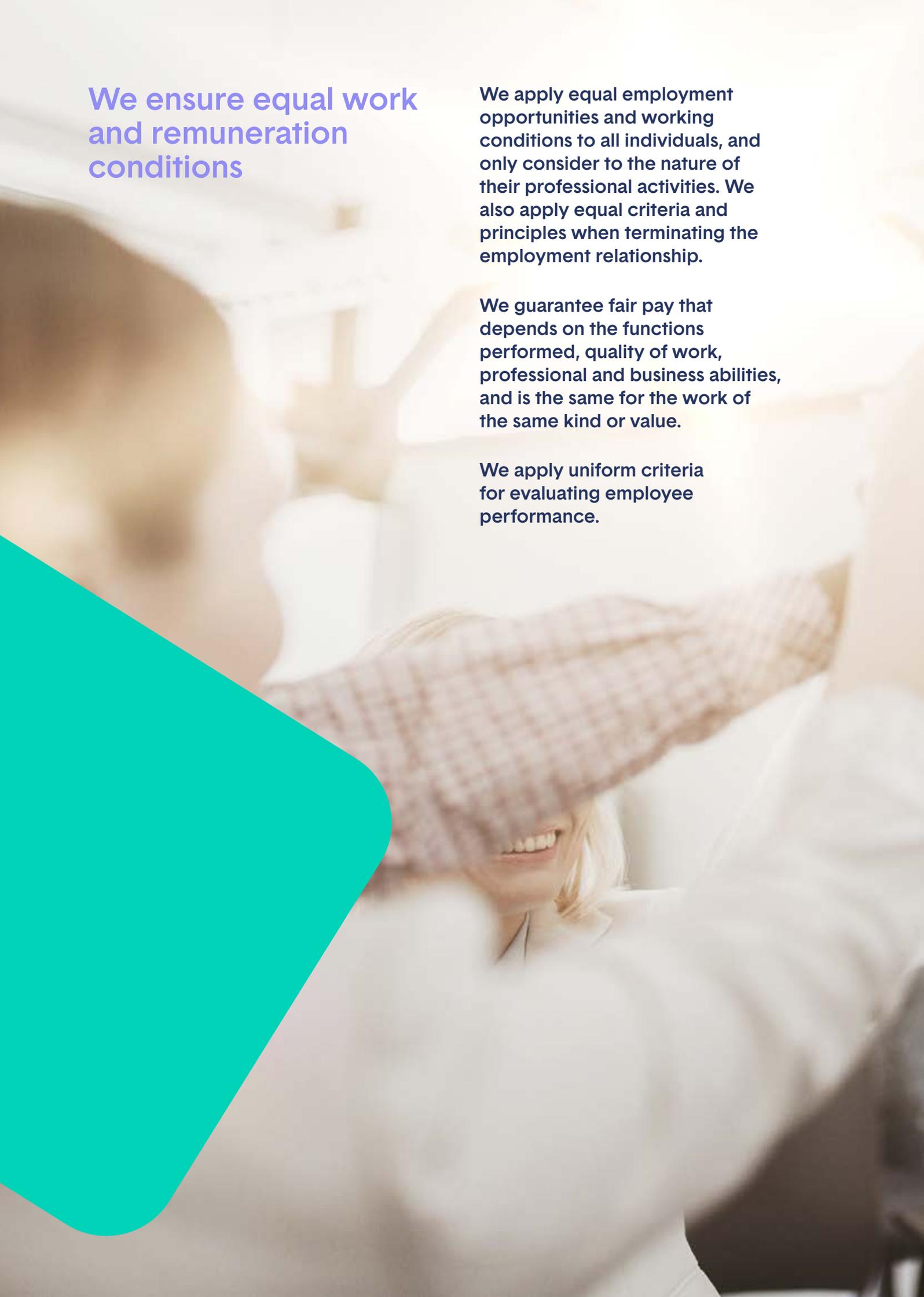
We are fair and objective, we rely on facts and data, and ask others to follow suit.

## We do not tolerate discrimination, harassment, bullying

We encourage diversity among employees and do not tolerate any forms of discrimination, including, but not limited to, discrimination based on age, gender, race, nationality, language, origin, social status, faith, beliefs or views, sexual orientation, disability, ethnicity, religion, and/or other characteristics protected by law.

We do not tolerate harassment, violence, humiliation or bullying in any form.

We protect the employees who report or testify on any issues or incidents and their representatives from hostile behaviour and other adverse consequences, including retaliation.



## **We ensure equal work and remuneration conditions**

**We apply equal employment opportunities and working conditions to all individuals, and only consider to the nature of their professional activities. We also apply equal criteria and principles when terminating the employment relationship.**

**We guarantee fair pay that depends on the functions performed, quality of work, professional and business abilities, and is the same for the work of the same kind or value.**

**We apply uniform criteria for evaluating employee performance.**



## More information:

Remuneration policy

Trust line

# Culture of safe work and improvement



In creating the energy of the future, we think and act globally. We are proud of our activities and strive to work safely and efficiently.

## We ensure occupational safety

We take preventative measures to ensure safe work environment and not endanger the environment, the health and life of colleagues, contractors and others.

We use modern, reliable and safe measures that are necessary to perform the job functions in a reliable quality.

We strictly prohibit any employee or a business partner representative to be engaged in any work activity while under the influence of any psychotropic substance, including, but not limited to, alcohol and drugs.

Having noticed inappropriate or unsafe behaviour in the workplace, we immediately report this to our solid line manager or responsible persons.

We take care of mental health of our employees, create an emotionally safe environment in the workplace, where everyone is accepted and supported.

# We are constantly growing and learning from each other

We identify opportunities and problems, propose solutions and implement them. We look for the causes of problems and ask what is important to the customer.

We improve the best qualities of the employees and facilitate upskilling.

We perform our duties in a responsible manner and are ready to cooperate and help others. We share experiences and competencies, we give advice, and, when necessary, we ask and seek help.

We do not blame anyone for their mistake. We analyse the situation and processes to find the cause of the mistake and make efforts to prevent it from happening again. We do not hide mistakes but talk about them so others can learn from them.



## More information:

Zero tolerance towards accidents at work policy



## **We support our colleagues**

**We are empathetic towards each other; we listen to each other's needs and form relationships based on respect and trust.**

**We value each other's ideas and recognize the efforts.**

**We help balance work and personal life smoothly.**

**We support employee representatives and voluntary membership in trade unions.**

**We empathise with and help colleagues when they are going through difficult times in their personal lives, we take care of the well-being of the employees who face challenges, we offer help to improve it.**

# Open and fair activities in the market

**We support open and fair competition, and relationships with business partners based on mutual value creation.**

## **We compete fairly**

We seek competitive advantage in the market by increasing our operational excellence and by improving performance, by investing in innovation, development and quality, and by creating attractive services.

We do not act in the way and do not tolerate actions that jeopardize fair competition or harm the customers (agreements with competitors, unlawful restrictions on the activities of customers or suppliers, unlawful disclosure or exchange of confidential and commercially significant information, manipulation of trading orders, transactions or information, abuse of a dominant or exclusive position).

## We conduct purchases and sales in a responsible way

We conduct all purchases and sales in accordance with established procedures in a transparent and efficient manner.

We ensure a responsible use of funds to purchase goods, services or works.

We closely monitor the performance of contracts in accordance with all requirements.



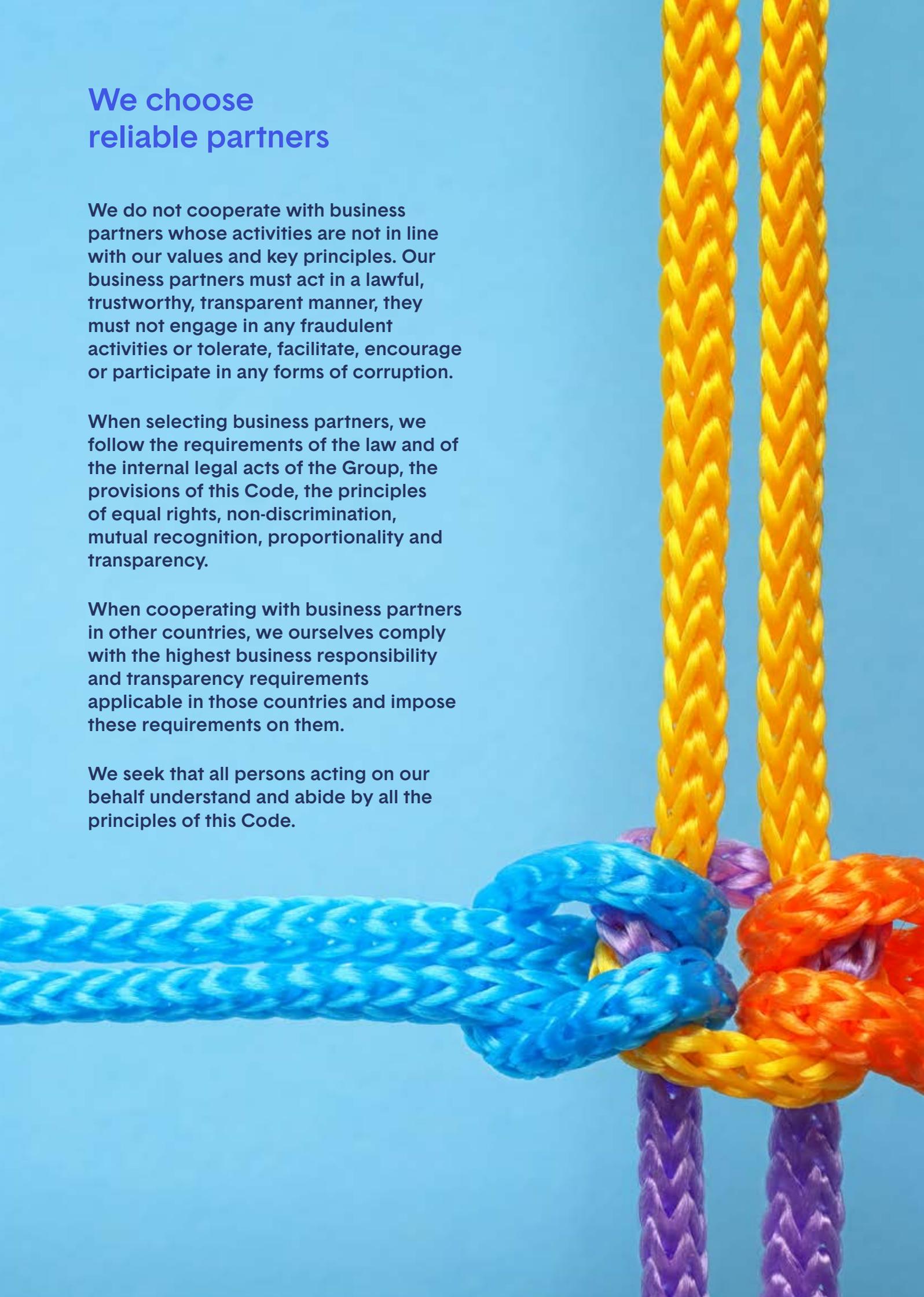
## We choose reliable partners

We do not cooperate with business partners whose activities are not in line with our values and key principles. Our business partners must act in a lawful, trustworthy, transparent manner, they must not engage in any fraudulent activities or tolerate, facilitate, encourage or participate in any forms of corruption.

When selecting business partners, we follow the requirements of the law and of the internal legal acts of the Group, the provisions of this Code, the principles of equal rights, non-discrimination, mutual recognition, proportionality and transparency.

When cooperating with business partners in other countries, we ourselves comply with the highest business responsibility and transparency requirements applicable in those countries and impose these requirements on them.

We seek that all persons acting on our behalf understand and abide by all the principles of this Code.



## We protect inside information

We do not carry out activities and do not initiate business relationships with business partners who are directly included into lists of international sanctions imposed by the European Union or other international organisations Lithuania is a member of, or the countries Lithuania cooperates with (the United States of America, Great Britain), or are directly or indirectly managed by such persons. We assess all business relationships with business partners in each individual case in respect of international sanctions and, if there are grounds for it or they contradict our principles and values, we terminate such relationships. We have a right to verify, and we verify our business partners as well as endeavour to immediately receive the information about the sanctions imposed by the European Union, by other organisations Lithuania is a member of, international sanctions imposed by the United States of America or Great Britain on the business partners and/or their shareholders, direct or indirect beneficiaries.

We do not disclose confidential or inside information to unauthorized persons (even if it is obtained inadvertently), especially if the disclosure of such information could affect the price of securities of the Group.

We do not engage in any dealings of shares or other securities with insider information.

We do not disseminate rumours or mislead others with inaccurate information.

## We are accountable for our activities

We issue public reports to our shareholders and to the public and provide operational and financial results in a timely, clear and comprehensive manner.

We prepare financial statements and activity reports in accordance with international standards and the highest transparency requirements.

Through transparency and public reporting, we ensure that we earn revenue ethically and lawfully, through our processes and procedures we ensure the prevention of money laundering and terrorist financing.

<sup>1</sup> Money laundering is a criminal activity of concealing the origin of money, obtained from illicit activities.

## We represent the interests of the Group professionally

We do not tolerate any use of the name of the Group companies or other circumstances arising from representation while pursuing goals that are not in the best interests of the Group companies, or the personal goals of the representative.

Where an incident, violation of the Code or any law, or other event takes place at any company of the Group that is significant to employees or other persons, we immediately report it to the managers, to the employees of compliance and communication functions, and, within the time frames prescribed by law, to the relevant authorities (if necessary).

Comments related to the activities of the Group companies are made public by the heads of the companies or other employees who have such authority; we convey to them the questions received from journalists or other stakeholders.

When sharing job-related information on personal accounts of social networking websites, we protect the reputation of the Group companies. We do not share confidential work information, photos and videos that capture images from places where making photos and filming is prohibited.



**More  
information:**

Information for  
suppliers

Asset Sales Transparency  
Policy

# Responsibility and transparency

We are one of the largest groups of energy companies in the Baltic states, and we contribute to establishing a global benchmark of transparency and responsible conduct.



## We strive to ensure the interests of all stakeholders

When performing their functions and managing the risks faced by the Group, the management and supervisory bodies seek to properly safeguard the property and non-property rights of shareholders, including the interests of minority shareholders.

## We have zero tolerance for corruption

We follow the provisions of the Anti-Corruption Policy and we do not tolerate bribery, graft, influence peddling, abuse of power and/or other forms of corruption, including money laundering.

We do not ourselves or through intermediaries, directly or indirectly, offer, promise, give, request or encourage bribing or taking bribes.

We do not pay or tolerate any form of facilitation payment<sup>2</sup>.

We seek that our business partners follow the principle of zero tolerance for corruption, we pass on our experience in fight against corruption to other companies: we share experience, initiate discussions and trainings.

We always uphold the duty to report any information in relation to an identified crime to the relevant law enforcement authorities.

<sup>2</sup>A facilitating payment is a low-value unofficial payment made with the intention of affecting a routine process to be carried out by the company in accordance with the law.

## We avoid conflicts of interest

We disclose our private interests in an open and fair manner by completing and updating declarations of interest in due time, we inform in advance of situations that may give rise to a conflict of interest.

We do not participate in making and enforcement of any decision that causes or may cause a conflict of interest.

We do not engage in activities that would be contrary to the interests of the Group companies or would cast doubt on our objectivity; we do not request or dispose information which is not necessary for the performance of duties.

If we suspect that the decisions made are potentially affected by a conflict of interest, we pass the information about this to responsible persons or competent authorities.

## We do not give or accept gifts

We will no longer give any gifts to business partners, except in cases when it is required by standard international protocols (Zero gifts policy).

We do not tolerate any gifts or hospitality which could directly or indirectly be interpreted as remuneration, influence, patronage. For the purposes of clarity, we only accept gifts that are considered in business practice as standard symbolic business gifts. The gifts that have been accepted, returned, given must be registered according to the procedure set out in internal legal acts of the Group.

Employees are prohibited to directly or indirectly request gifts and/or hospitality from stakeholders and business partners.

## We guarantee privacy of the individual and protection of his/her personal data

We process personal data of employees, business partners and other entities only when there is a legal basis and purpose for doing it.

We process data by ensuring its privacy, security and confidentiality, and appropriate technical and organizational measures to protect the data against unauthorized access, disclosure, accidental loss, alteration, destruction or other unlawful processing.

We deal with individuals' requests and other issues relating to the processing of personal data and/or the rights of individuals promptly and in compliance with legal requirements.



## We ensure the confidentiality of information

**We protect the information about company operations, employees, customers and business partners that is collected in the Group companies and that has come to light in the exercise of job functions against any unlawful disclosure.**

**While collecting, storing and sharing information, we follow the “need-to-know” principle<sup>3</sup>.**

**We protect confidential information entrusted to us by customers, business partners and any other parties as our own.**

## We use resources responsibly<sup>4</sup>

**We protect the resources of the Group companies and use them for their intended purpose, by saving them and sharing with each other.**

**We notify the persons responsible about misuse of resources of the Group companies, damaged or lost assets.**

**If we have ideas on how to use the organisation's resources more efficiently, we propose them to our solid line manager.**

<sup>3</sup> “Need-to-know” principle – in accordance with the procedures laid down in the internal legislation, confidential information shall be disclosed only to individuals who need to know it to perform their direct activities, or where it is necessary for the operation of the company or required by applicable law.

<sup>4</sup> Resources of the organization - tangible assets (infrastructure, equipment, vehicles, raw materials and funds) and intangible assets (confidential information, time, information systems, intellectual property) the employees use to perform their work and achieve the goals of the organisation. Wasting resources or using them inappropriately causes damage to the organisation.



**More information:**

Anti-corruption Policy

Dividend Policy

## **We care about protecting the environment**

**We use advanced, energy and resource efficient tools and technologies that help reduce environmental impact of our activities, we implement processes that meet environmental standards, we apply the principle of environmental impact mitigation hierarchy by mitigating the impact where it is the most necessary and compensating it only if there are no ways to avoid it.**

**We invest in and develop green energy generation, take care of increasing the efficiency of the distribution network and develop smart solutions.**

**We ensure proper management of waste generated in our operations, the application of measures of mitigating the impact on biodiversity and ecosystems in our activities and the reduction of greenhouse gas emissions.**

**We promote sustainable mobility. We give priority to less polluting transport, enable our employees to ride bikes and scooters to work and meetings, to choose public transport.**

**We encourage residents and businesses to use energy sources efficiently and to protect the environment.**

**We actively participate in eco-initiatives and preventive programmes that ensure environmental protection.**



A group of about ten people are seen from an aerial perspective, ascending a steep, snow-covered mountain slope. They are wearing colorful winter gear and are spaced out along a path. The terrain is rugged with some dark rocks protruding from the snow. The sky is a pale, overcast grey. The overall scene conveys a sense of challenge and teamwork.

# Enabling and protecting partnership

While creating value for society, we combine innovation and many years of experience, we open up to the world and maintain energy independence.

## **We strive to remain apolitical**

**The Group is not involved in political activities, does not support or expect any support from political parties, organisations or individuals involved in politics otherwise.**

**We do not limit personal initiative of employees of participating in political activities. However, such personal actions of the employees must be clearly separated and not related to the activities, position and responsibilities of the Group companies.**

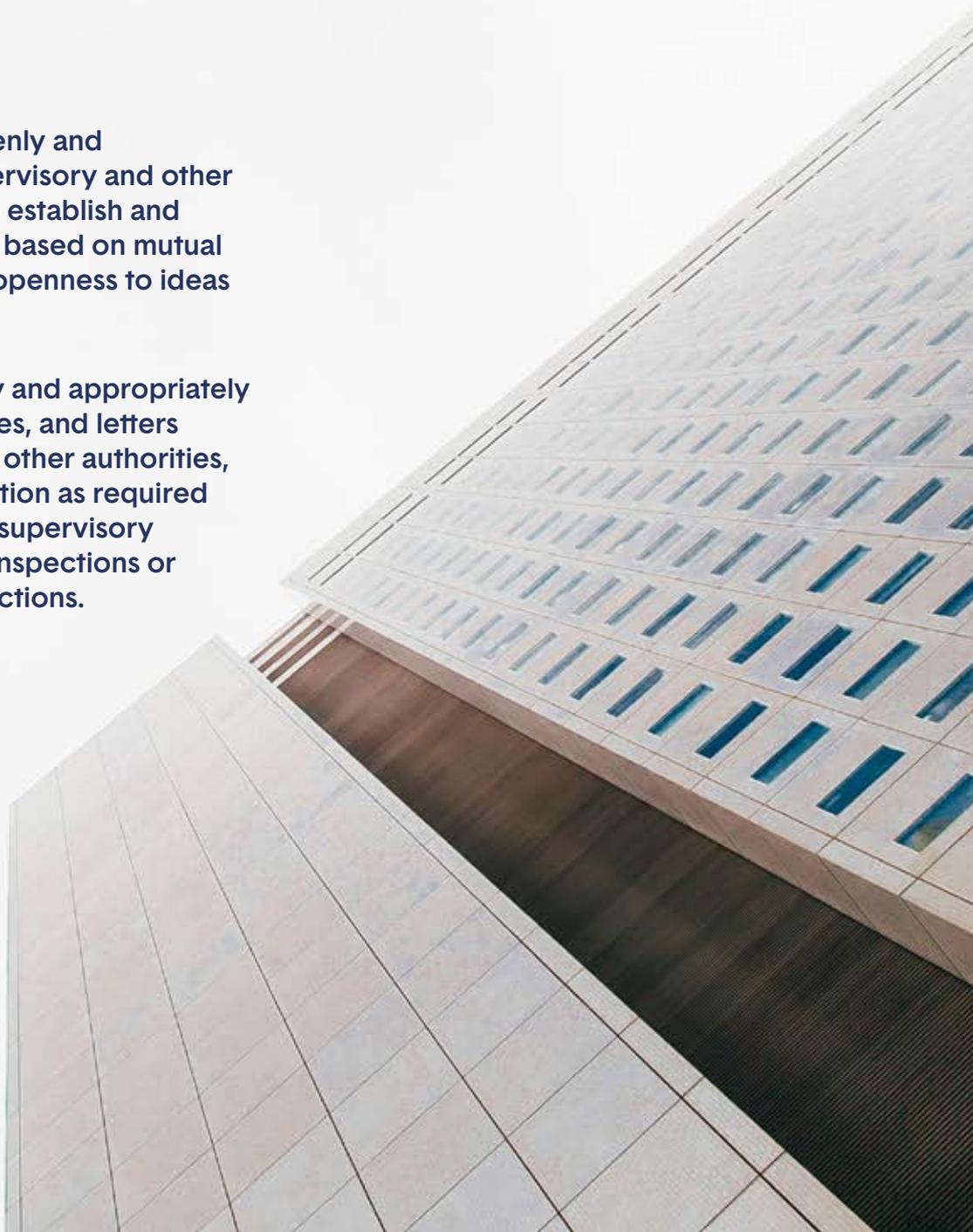
**We do not influence legislators illegally. We ensure transparency when providing our comments, suggestions and positions on draft legislation which could have an impact on the activities, employees, customers and shareholders of the Group companies.**



## We cooperate with supervisory and other authorities

We communicate openly and respectfully with supervisory and other authorities in order to establish and maintain cooperation based on mutual understanding, trust, openness to ideas and opinions.

We respond promptly and appropriately to all requests, inquiries, and letters from supervisory and other authorities, we exchange information as required and cooperate when supervisory authorities carry out inspections or other supervisory functions.



## We maintain relationships with communities and non-governmental organisations

We strive for open dialogue and maintain close contact with the communities next to whom we operate and develop projects.

We account for our activities in a consistent and transparent manner, and, in cooperation with various organisations, we actively contribute to the social development of the society and wealth creation.

We encourage employees to volunteer.



**More  
information:**

Sustainability  
policy

# Monitoring compliance with the Code

All employees of the Group are responsible for the proper compliance with the provisions of the Code.

Ensuring and monitoring of proper compliance with the provisions of the Code is the responsibility of the managers of various levels that work in the Group and of the employees of Business Resilience, Sustainability and Internal Audit functions, as well as of the Risk Management and Business Ethics Supervision Committee in accordance with the scheme presented below:

Line **3** | **The Internal Audit of Ignitis Group and the Risk Management and Business Ethics Supervision Committee under the Supervisory Board of Ignitis Group.**  
**Function:** Evaluation of results of Code compliance and making recommendations.

Line **2** | **Employees of Business Resilience and Sustainability functions working in the Group companies.**  
**Function:** Monitoring the compliance with the Code, knowledge testing, result summary.

Line **1** | **Managers of various levels of the Group companies.**  
**Function:** Introducing provisions of the Code to the employees, collecting feedback.

# Notification of breaches of the Code

## Do you have doubts if your decision is in breach of the provisions of the Code?

If you are an employee of the Group, consult your solid line manager or a representative of the related functional area.

## Do you suspect that the provisions of this Code are in breach?

Notify us via the Trust Line:



E-mail [pasitikejimolinija@ignitis.lt](mailto:pasitikejimolinija@ignitis.lt)



Phone **+370 640 88889**



Website. [Click here.](#)

Trust Line guarantees anonymity of whistle-blowers and meets the requirements of the Law on Whistle-Blower Protection.

This Code was approved and can be amended by the Management Board of the parent company AB Ignitis Grupė of Ignitis Group. By its decision the Code is made publicly available.

The Code is approved on 22 November 2022.



Annex

# How to comply with the Code of ethics of Ignitis group?

# Respect and equal opportunities



There have been occasions where my colleague felt uncomfortable after someone at her team made a joke about her age or clothes. It does not bother me when such jokes are made about me. Should I warn my colleagues about inappropriate comments, or should I wait until the colleague will tell them off herself?

We do not tolerate discrimination, harassment or bullying. If you notice that your colleague feels uncomfortable about the comments made towards him/her in respect of his/her age, clothes, etc., we encourage you to speak out that such comments are making your colleague feel uncomfortable. You can also take initiative and talk with your colleagues about work culture at the Group.



My colleague told me that she did not suggest her acquaintance to apply for a job as a project manager at the Group because she is likely to have children in the near future, and the Group will have to conduct a new selection for the position again. Were my colleague's actions appropriate?

No, they were not appropriate. The Group provides equal employment opportunities and working conditions for all, and only considers the nature of one's professional activities. We also help our colleagues balance work and personal life smoothly.

The acquaintance of the colleague could have been an excellent professional and working at the Group could have brought the best of her abilities.

# A culture of occupational safety and growth



Some colleagues leave various documents, along with their coffee mugs, lying on the table in common working areas. Sometimes they even leave their computers unlocked. I understand that we are colleagues, and we work towards a common goal but maybe I should bring my colleagues' attention to this?

We must not create any conditions for any persons (including colleagues) who do not have the right to access the information we handle to access it.

We must bring this to the attention of our colleagues. We all must comply with the "clean desk" policy. We must lock the computer before leaving the workstation (even if for a little while), and thus secure the information as well as the assets the information is stored in. We make physical copies of the documents only if it is necessary. We must not leave any documents on the table or elsewhere unattended. Documents that are no longer necessary must be destroyed using paper shredder. We leave an empty and clean workstation.



One of my colleagues has boasted that he had started going to the gym and exercising. He feels much stronger, so he says that he no longer needs so much protective equipment when working. Is this true?

Darbuotojų saugumas ir sveikata yra prioritetas. Grupėje yra siekiama užtikrinti saugią darbo aplinką, kad nekiltų pavojaus kolegų, rangovų ir aplinkinių sveikatai bei gyvybei. Kolega privalo dėvėti visas reikalingas apsaugas nepaisant to, kad jis jaučiasi tvirčiau ar saugiau.



I have noticed that a new colleague is asking very few questions, as if he is afraid to ask. He had mentioned before that he doesn't like to ask questions because he supposedly interrupts and wastes everyone's time. How can I encourage him?

One of our values is growth. We perform our duties in a responsible manner and are ready to cooperate and help others. So, the new colleagues shouldn't feel bad if he wants to know or learn something new. If we don't have time to help our colleagues at the moment, we agree on a date when we will be able to do so.

## Open and fair conduct in the market



A colleague who prepares financial statements of the Group has acquired shares of Ignitis Group a couple of days before the statements are to be published. She also encourages her family members to do the same. Were the colleague's actions appropriate?

The colleague's actions were inappropriate. We safeguard inside information; we do not engage in any dealings of shares or other securities of the company with insider information.



My colleague's brother is working at the printing house. The brother once told her that he could offer exclusive conditions and discounts to the Group companies. The colleague promised to talk with her colleagues and try to convince them to use the services of that printing house, instead of others. Were my colleague's actions appropriate?

No, this is not appropriate. We conduct all purchases and sales in accordance with established procedures and in a responsible, transparent and efficient manner. Also, we do not conduct any activities that contradict the interests of the Group companies or raise doubts regarding the objectivity of their decisions. The colleague should not participate in any decision making or implementation related to her brother's printing house. Making decisions related to a relative (brother) may result in the conflict of interest.



**A colleague who visits customers and maintains electricity and natural gas meters has decided to earn additional money by fixing customers' electrical wiring. Did the colleague act appropriately?**

**No, it was not appropriate. We do not tolerate using the Group's name for personal gains. During working hours, we carry out our duties responsibly.**

**All Group employees must conduct their work in a fair manner. They must not abuse their current position for personal gain or to benefit relatives and must not damage the Group's or the public interest.**

**Work equipment, financial, material resources, internal and confidential information must be used only to carry out direct obligations of the current position unless otherwise specified in writing.**

## Responsibility and transparency



One colleague often brings his computer to various public meetings and works during them (answers emails, etc.). Once I made a remark that he should handle information more carefully, especially confidential information because anyone could see his emails. But the colleague just laughed at me, "Who could care about my emails or documents?" Should I talk to him again?

Yes, you must! We all have to take part in ensuring the confidentiality of information, we must also protect any confidential information about company's operations, employees, customers and business partners that is collected by the Group companies against any unlawful disclosure.

Work computers must be protected and locked and must not be left unattended in public places.



My kid's school wants to upgrade the gym equipment. I just saved on the budget of one project. Could I offer to use the funds saved to support the school financially?

The Group grants financial support only in accordance with the legislation regulating financial support and with the rules for granting financial support currently applicable in the Group.

The Group has a unified criteria for granting financial support, which are defined in the Group Financial Support Policy. You can find it [here](#).



I believe that one of the contractors of a Group company waste resources and are even using them for personal needs. I don't want to be a snitch, so I did not tell anyone about my concerns. Are my actions appropriate?



One supplier gifted me two tickets to a concert and an invitation to a dinner right before the end of the contract. He wants to express his gratitude for cooperation. Should I accept the gift?

If the actions of Group employees and/or business partners raise any concerns, you can report them using the Trust Line:

- 1) Via email:  
[pasitikejimolinija@ignitis.lt](mailto:pasitikejimolinija@ignitis.lt)
- 2) Send a completed 'Report a violation' form
- 3) Leave a message in an autoresponder of the Trust Line: +370 640 88889
- 4) Report about it directly to Business Resilience at the following address: Vilnius municipality, Laisvės Ave. 10, 04215 Vilnius

All messages received via the Trust Line are processed in accordance with the established procedure, and summary reports on the received notifications are provided in accordance with the legislation requirements.

We undertake to ensure whistle-blower anonymity and confidentiality of the submitted information. We encourage you to leave as much information as possible, leave your contacts – the more data we have, the more comprehensive investigation can be carried out.

We value transparent cooperation based on trust, partnership and respect. We believe that the best gift is a sincere thank you and the attention provided. Therefore, we abandon any practices of giving gifts to business partners, except when it is required by standard international protocols.

We also encourage our business partners not to give any gifts to Group employees. If you'd like to the Group employees, please do so with attention and good words, rather than with gifts of material value.

You should politely refuse to accept any gifts from suppliers and explain to them that the best form of gratitude is attention and common results. All given and received gifts must be registered in the Group's gift register.

## Enabling and protecting partnership



I would like to participate in a protest that will take place during work hours next to the Parliament of the Republic of Lithuania. Can I participate in it?

The Group does not restrict personal initiative of its employees to participate in political activities, however, such activities should be clearly separated from and should not be linked to the activities, position and responsibilities of the Group companies. You cannot participate in the protest during work hours because you must carry out your work responsibilities at that time. You can attend the protest in your free time.



I received a letter from the authority supervising the Group, the Bank of Lithuania, with a request to revise the data of one report. I have planned a vacation, and I intend to submit the requested data when I get back, even though it will be later than the deadline indicated in the letter. I don't think there should be any issues because I know that some people at the Bank of Lithuania will also be on vacation, so they will probably check my data at a later date. Are my actions appropriate?

No, they are not appropriate. We must react to all requests, inquiries and letters received from supervisory and other authorities in a timely and proper manner. We must exchange information in accordance with the requirements.

If you have a vacation planned or see that you will not meet the request in time for other reasons, you should delegate the task to the person substituting you or ask other colleagues for help.



