



Title	Privacy Rules for Candidates' Personal Data
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1 Annex. List of posts subject to the (non-)criminal record requirement

The Invalda INVL Group¹ processes personal data on (non-) criminal records of candidates and employees on different legal grounds:

1. The data on (non-)criminal records of managers and persons performing key functions are processed in accordance with the laws and regulations of the Republic of Lithuania, which lay down the requirements of impeccable reputation and non-conviction of criminal offences, e.g., the Law on Markets in Financial Instruments of the Republic of Lithuania, the Regulations on the Evaluation of Managers and Persons Performing Key Functions in the Financial Market Participants Under the Supervision of the Bank of Lithuania.
2. Data on (non-)criminal records of candidates for employment and employees whose activities and/or decisions may have a significant impact on the nature and size of the risks assumed by the Company shall be processed for the Company's legitimate interest in accordance with Article 5(2) of the Law on Legal Protection of Personal Data of the Republic of Lithuania, in accordance with the list of criminal offences established by the Company.

This document contains a list of criminal offences for which employees and candidates for relevant functions must not have been convicted, and a list of positions.

A list of significant positions and functions in INVL Financial Advisors UAB FMJ for which employees and candidates for such positions are required to provide a (non-) criminal record certificate:

Job title in Lithuanian language	Job title in English language
Grupės vidaus audito direktorius	Head of Group Internal Audit
Grupės rizikos valdymo vadovas	Group Chief Risk Manager
Pinigų plovimo prevencijos ir sankcijų vadovas	AML/Sanctions Compliance Officer
Grupės finansų vadovas	Group CFO
IT vadovas	IT Manager

Employees and candidates for positions related to the performance of functions of significance are asked to confirm that they have not been convicted of the following offences (the Company may request documentation to prove (non-)criminal convictions).

1. Criminal offences in breach of the laws governing banking or other financial institutions, insurance activities or the markets in financial instruments, offences relating to securities markets or securities or payment instruments, as well as offences relating to anti-money laundering and terrorist financing,

¹ The Invalda INVL Group currently consists of the following companies: „INVL Asset Management“ UAB, „Invalda INVL“ AB, „INVL Financial Advisors“ UAB FMI (including its Estonian and Latvian branches), UTIB „INVL Baltic Real Estate“, UTIB „INVL Technology“ and „INVL Baltic Farmland“ AB.

market manipulation, insider dealing or equivalent offences under the criminal law of other countries, provided that the criminal record for the above offences has not been spent or expunged;

2. Other financial and tax offences or offences corresponding thereto under the criminal law of other States, provided that the criminal record for the above offences has not been spent or expunged;

3. A serious, very serious or intentional offence against property, property rights and property interests, economic and business order, public security, public service and public interests, or offences corresponding thereto, in accordance with the criminal laws of other States, provided that the conviction for the offences referred to above has not lapsed or has not been quashed.