

How Transparent is Business in Lithuania?



Assessment of the Largest Companies | 2017



Transparency International is the global civil society organisation leading the fight against corruption. Through more than 100 chapters worldwide and an international secretariat in Berlin, it raises awareness of the damaging effects of corruption and work with partners in government, business and civil society to develop and implement effective measures to tackle it.

www.transparency.org

Transparency International Lithuania (TI Lithuania), established on 6th June of 2000, is a non-political organisation that co-operates and coordinates its activities with governmental and non-governmental institutions in both Lithuania and abroad.

www.transparency.lt

For an interactive overview of this research please visit **www.skaidrumas.lt/imones**



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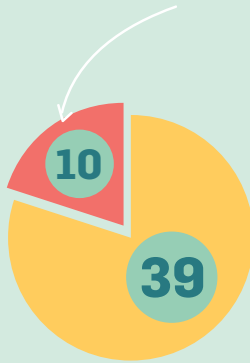
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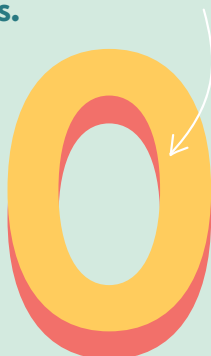
1 Overview

We have assessed the transparency of 49 largest companies in Lithuania.

One-fifth did really well.



We have assessed whether companies publish their anti-corruption programmes, as well as info on organisational structure and financial reporting. One quarter of the companies received 0 points.



Thanks to us, one-third has become more transparent.

17 out of 49



Over the past three years the largest companies have increased their level of transparency by 10 points – from 22 in 2014 to 32 in 2017.



TI Lithuania intends to continue its work on business transparency, while paying greater attention to the role of business associations as trend-setters of transparency standards for their corporate members.

Methodology

This report on private sector transparency evaluates 49 of the largest companies in Lithuania. The companies have been selected based on their income records for 2016 that are announced by a business news outlet “Verslo Žinios” and on the companies’ websites.

The methodology includes 27 questions in total. TI Lithuania analysed corporate websites while looking for publicly available information on the company’s anti-corruption programme, organisational structure and financial reporting. A detailed methodology is provided as Annex 1 within this study.

The Transparency in Corporate Reporting assessment conducted in Lithuania uses a similar methodology as the *Transparency in Corporate Reporting: Assessing the World’s Largest Companies* which is produced periodically by the Transparency International Secretariat. The latest edition of the global report, published in 2014, included Siemens as one of the 124 companies that were assessed.

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The full and interactive overview of this research is available online at www.skaidrumas.lt/imones.



The content of companies’ websites has been assessed on August and September 2017.



Main insights

The methodology is comprised from 27 questions in 3 categories: company's anti-corruption programme, organisational structure and financial reporting.



22 companies publicly state a commitment to “zero tolerance to corruption”, although the same number (22) of businesses does not provide any information on anti-corruption measures in place.

22

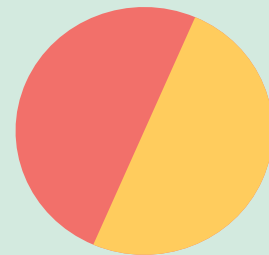
In comparison with 2014, the number of companies that publish their hospitality policy has increased three times (18 out of 49 companies).

18

16

Almost one in three (16) companies have a confidential channel to report possible wrongdoings.

More than half of the companies publicly report their shareholders (legal persons).



A third publish corporate income taxes paid.

A third (17) of the companies improved their corporate transparency due to this research.

This research has already been done twice (with similar methodologies) – in 2014 and 2017.

19 companies publicly announce their income.

Overall ratings

Tele2 (100 points), Telia Lietuva (98 points), Maxima LT (96 points), Lietuvos draudimas (95 points), Swedbank & SEB (94 points) provide most information to the public.

Over the past three years, the largest companies in Lithuania have become more transparent. In 2014 their average score was 22 points (out of 100), whereas in 2017 it was 32.



POSITION	COMPANY NAME	OVERALL RATING	OVERALL IMPROVEMENT DURING THE STUDY
1	Tele2, UAB	100%	+98%
2	Telia Lietuva, AB	98%	+2%
3	Maxima LT, UAB	96%	+67%
4	Lietuvos draudimas, AB	95%	+47%
5-6	Swedbank, AB	94%	+7%
5-6	SEB, UAB	94%	+2%
7	Lietuvos energijos gamyba, AB	93%	+22%
8	Lietuvos geležinkeliai, AB	91%	0%
9-10	Circle K Lietuva, UAB	89%	+86%
9-10	Lietuvos dujų tiekimas, UAB	89%	+30%
11	Orion Global Pet, UAB	79%	+31%
12	Energijos skirstymo operatorius, AB	74%	0%
13	Orlen Lietuva, AB	54%	0%
14-15	Bitė Lietuva, AB	41%	+41%

14-15	Kesko Senukai Lithuania, UAB	41%	+37%
16	Sicor Biotech, UAB	31%	0%
17-19	Mars Lietuva, UAB	30%	+30%
17-19	Nemuno vaistinė, UAB	30%	+28%
17-19	Rokiškio sūris, AB	30%	0%
20	Thermo Fisher Scientific Baltic	28%	+22%
21-24	Achema AB	26%	+22%
21-24	Vilniaus energija, UAB	26%	+15%
21-24	Linas Agro, UAB	26%	0%
21-24	Eurovaistinė, UAB	26%	0%
25	Lifosa, AB	24%	0%
26-27	Kauno grūdai, AB	9%	0%
26-27	Rimi Lietuva, UAB	9%	0%
28-29	Norfos mažmena, UAB	7%	0%
28-29	SBA Baldu Kompanija, UAB	7%	0%
30-31	Palink, UAB	6%	0%
30-31	Rivona, UAB	6%	0%
32-35	Agrochema, UAB	4%	0%
32-35	Agrokonzerno grūdai, UAB	4%	0%
32-35	Sanitex, UAB	4%	0%
32-35	Top Sport, UAB	4%	0%
36-37	Agrorodeo, UAB	2%	0%
36-37	Limedika, UAB	2%	0%
38-49	ACC Distribution, UAB	0%	0%
38-49	AMIC Lietuva, UAB	0%	0%
38-49	AVAD Baltic, UAB	0%	0%
38-49	Baltic Agro, UAB	0%	0%
38-49	Baltic Petroleum, UAB	0%	0%
38-49	BOEN Lietuva, UAB	0%	0%
38-49	EVD, UAB	0%	0%
38-49	Girteka Logistics, UAB	0%	0%
38-49	Mineraliniai vandenys, UAB	0%	0%
38-49	Neo Group, UAB	0%	0%
38-49	Silberauto, UAB	0%	0%
38-49	Viada, UAB	0%	0%



Transparency of anti-corruption programs

This section focuses and evaluates how much information about the anti-corruption policies and internal codes of ethics the companies make public.

Half (25) of the 49 companies provided at least some information on their anti-corruption policies.



Almost one in three (16) of the companies have a confidential channel to report possible wrongdoings.

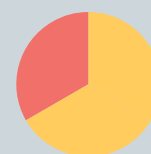
One fifth (10) of the companies declare to provide whistleblowers' protection to their employees and publicly specify that no employee will suffer demotion, penalty or other reprisals for raising concerns or reporting violations.

10

22 companies publicly state a commitment of "zero tolerance to corruption", although the same number (22) of businesses does not provide any information on anti-corruption measures in place.

22

One in three (18) of the companies announce that their code of ethics are applicable to all their employees.



Less than one in three (14) companies announce that their publicly available codes of ethics are applicable to their representatives and intermediates, whereas only one in five (10) of the companies have the same clause regarding their contractors and subcontractors.

One in three (18) of the companies discloses its policy on gifts, hospitality and travel expenses.

18

POSITION	COMPANY NAME	RATING FOR TRANSPARENCY OF ANTI-CORRUPTION PROGRAMS
1-4	Tele2, UAB	100%
1-4	Telia Lietuva, AB	100%
1-4	Lietuvos geležinkeliai, AB	100%
1-4	Circle K Lietuva, UAB	100%
5-8	Maxima LT, UAB	92%
5-8	Lietuvos draudimas, AB	92%
5-8	Swedbank, AB	92%
5-8	SEB, UAB	92%
9	Lietuvos energijos gamyba, AB	88%
10-11	Orion Global Pet, UAB	85%
10-11	Bitė Lietuva, AB	85%
12	Lietuvos dujų tiekimas, UAB	81%
13	Kesko Senukai Lithuania, UAB	77%
14	Energijos skirstymo operatorius, AB	65%
15	Sicor Biotech, UAB	62%
16	Nemuno vaistinė, UAB	50%
17-18	Mars Lietuva, UAB	46%
17-18	Eurovaistinė, UAB	46%
19	Vilniaus energija, UAB	31%
20	Achema AB	27%
21	Orlen Lietuva, AB	15%
22	Lifosa, AB	12%
23-24	Thermo Fisher Scientific Baltic	8%
23-24	Kauno grūdai, AB	8%
25	Rimi Lietuva, UAB	4%
26-49	Rokiškio sūris, AB	0%
26-49	Linas Agro, UAB	0%
26-49	Norfos mažmena, UAB	0%
26-49	SBA Baldu Kompanija, UAB	0%
26-49	Palink, UAB	0%
26-49	Rivona, UAB	0%
26-49	Agrochema, UAB	0%
26-49	Agrokoncerno grūdai, UAB	0%
26-49	Sanitex, UAB	0%
26-49	Top Sport, UAB	0%
26-49	Agrorodeo, UAB	0%
26-49	Limedika, UAB	0%
26-49	ACC Distribution, UAB	0%
26-49	AMIC Lietuva, UAB	0%
26-49	AVAD Baltic, UAB	0%
26-49	Baltic Agro, UAB	0%
26-49	Baltic Petroleum, UAB	0%
26-49	BOEN Lietuva, UAB	0%
26-49	EVD, UAB	0%
26-49	Girteka Logistics, UAB	0%
26-49	Mineraliniai vandenys, UAB	0%
26-49	Neo Group, UAB	0%
26-49	Silberauto, UAB	0%
26-49	Viada, UAB	0%

Organisational transparency

More than half (27) of the companies reveal their shareholders (legal persons).

A third (18) of the companies provide information regarding their subsidiary companies: 6 indicate that they do not have subsidiaries, while **the rest (12)** disclose a complete list of their subsidiaries on whose activities the company may have a direct or indirect decisive influence. Out of these 12 companies:

- 10 disclose the percentage of subsidiaries they own;
- 11 disclose the country of establishment of their subsidiaries;
- 6 disclose the countries of operation of their subsidiaries.

Less than a third (14) of the companies provide information regarding their associated companies: 3 indicate that they do not have associated companies, while the rest (11) disclose a complete list of their associated companies.

POSITION	COMPANY NAME	ORGANISATIONAL TRANSPARENCY
1-9	Tele2, UAB	100%
1-9	Telia Lietuva, AB	100%
1-9	Circle K Lietuva, UAB	100%
1-9	Maxima LT, UAB	100%
1-9	Lietuvos draudimas, AB	100%
1-9	SEB, UAB	100%
1-9	Lietuvos energijos gamyba, AB	100%
1-9	Orion Global Pet, UAB	100%
1-9	Lietuvos dujų tiekimas, UAB	100%
10	Swedbank, AB	94%
11	Orlen Lietuva, AB	89%
12	Energijos skirstymo operatorius, AB	80%
13-14	Lietuvos geležinkeliai, AB	78%
13-14	Linas Agro, UAB	78%
15	Thermo Fisher Scientific Baltic	56%
16	Rokiškio sūris, AB	44%
17	SBA Baldu Kompanija, UAB	22%
18-29	Nemuno vaistinė, UAB	11%
18-29	Eurovaistinė, UAB	11%
18-29	Vilniaus energija, UAB	11%
18-29	Achema AB	11%
18-29	Lifosa, AB	11%
18-29	Kauno grūdai, AB	11%

18-29	Rimi Lietuva, UAB	11%
18-29	Norfos mažmena, UAB	11%
18-29	Palink, UAB	11%
18-29	Rivona, UAB	11%
18-29	Agrochema, UAB	11%
18-29	Agrokonzerno grūdai, UAB	11%
30	Limedika, UAB	6%
31-49	Bitė Lietuva, AB	0%
31-49	Kesko Senukai Lithuania, UAB	0%
31-49	Sicor Biotech, UAB	0%
31-49	Mars Lietuva, UAB	0%
31-49	Sanitex, UAB	0%
31-49	Top Sport, UAB	0%
31-49	Agrorodeo, UAB	0%
31-49	ACC Distribution, UAB	0%
31-49	AMIC Lietuva, UAB	0%
31-49	AVAD Baltic, UAB	0%
31-49	Baltic Agro, UAB	0%
31-49	Baltic Petroleum, UAB	0%
31-49	BOEN Lietuva, UAB	0%
31-49	EVD, UAB	0%
31-49	Girteka Logistics, UAB	0%
31-49	Mineraliniai vandenys, UAB	0%
31-49	Neo Group, UAB	0%
31-49	Silberauto, UAB	0%
31-49	Viada, UAB	0%



Financial transparency

One fourth (12) of the companies publicly report about their contribution to national or local communities or initiatives.

Next to that, **27 companies** do so in part by revealing at least one of the following elements: the financial value of the contribution to the community; the list of beneficiaries; or the detailed description of the supported projects.

Less than a third (13) of the companies announce their income/ sales in Lithuania. On top of that, 6 more companies do so not in a detailed manner.

One in three companies publicly disclose their investments in fixed assets in Lithuania (17 companies) and their income tax paid in Lithuania (16 companies).

Less than a third (14) of the companies publish their profit before tax.

POSITION	COMPANY NAME	FINANCIAL TRANSPARENCY
1-6	Tele2, UAB	100%
1-6	Maxima LT, UAB	100%
1-6	Lietuvos draudimas, AB	100%
1-6	Lietuvos energijos gamyba, AB	100%
1-6	Lietuvos dujų tiekimas, UAB	100%
1-6	Swedbank, AB	100%
7-11	Telia Lietuva, AB	90%
7-11	SEB, UAB	90%
7-11	Orlen Lietuva, AB	90%
7-11	Energijos skirstymo operatorius, AB	90%
7-11	Lietuvos geležinkeliai, AB	90%
12-13	Rokiškio sūris, AB	80%
12-13	Lifosa, AB	80%
14-15	Circle K Lietuva, UAB	60%
14-15	Orion Global Pet, UAB	60%
16	Achema AB	50%
17-18	Vilniaus energija, UAB	40%
17-18	Mars Lietuva, UAB	40%
19	Thermo Fisher Scientific Baltic	30%
20-24	Rimi Lietuva, UAB	20%
20-24	Norfos mažmena, UAB	20%
20-24	Kesko Senukai Lithuania, UAB	20%
20-24	Sanitex, UAB	20%
20-24	Top Sport, UAB	20%
25-30	Nemuno vaistinė, UAB	10%
25-30	Kauno grūdai, AB	10%
25-30	Palink, UAB	10%
25-30	Rivona, UAB	10%
25-30	Sicor Biotech, UAB	10%
25-30	Agrorodeo, UAB	10%
31-49	Linas Agro, UAB	0%
31-49	SBA Baldu Kompanija, UAB	0%
31-49	Eurovaistinė, UAB	0%
31-49	Agrochema, UAB	0%
31-49	Agrokonzerno grūdai, UAB	0%
31-49	Limedika, UAB	0%
31-49	Bitė Lietuva, AB	0%
31-49	ACC Distribution, UAB	0%
31-49	AMIC Lietuva, UAB	0%
31-49	AVAD Baltic, UAB	0%
31-49	Baltic Agro, UAB	0%
31-49	Baltic Petroleum, UAB	0%
31-49	BOEN Lietuva, UAB	0%
31-49	EVD, UAB	0%
31-49	Girtėka Logistics, UAB	0%
31-49	Mineraliniai vandenys, UAB	0%
31-49	Neo Group, UAB	0%
31-49	Silberauto, UAB	0%
31-49	Viada, UAB	0%

Self-assessment toolkit

This research is supplemented with a self-assessment toolkit that enables companies to assess themselves using the corporate transparency methodology.

Assess your company
@ www.skaidrumas.lt/imones/isivertink !



Annex 1: Questionnaire

I. Reporting on Anti-Corruption Programmes (ACP)

1) Does the company have a publicly stated commitment to anti-corruption?

1 point - If there is an explicit and understandable statement of “zero tolerance to corruption” or equivalent;

0,5 point – If there is no general anti-corruption statement, but only reference to corruption or if there is no explicit and public obligation, but only a reference to the relevant legal norm. The words “corruption” or “bribery” must be mentioned;

0 points – If there is no such statement/ commitment.

** “Explicit provision” in this case means that the company announcing the intolerance of corruption does not leave any reasonable doubt about the position of the company. The word “corruption” must be mentioned and the unequivocal position must be expressed.*

2) Does the company publicly commit to be in compliance with all relevant laws, including anti-corruption laws?

1 point - If there is an explicit statement of such commitment for all jurisdictions in which a company operates

0,5 point - If there is a provision for non-infringement of legal norms in all jurisdictions, but there is no clear reference to anti-corruption norms;

0 points – If there is no such statement/ commitment.

3) Does the company leadership publicly express the support for anti-corruption? For example, has the leadership issued such statements within the corporate social responsibility report or in a public statement about the integrity of the company?

1 point - If such provision is in a document of the company (social responsibility / sustainability report, etc.) or on the website of the company with a clear reference to integrity / anti-corruption or if such provision is in the corporate Code of ethics/ Code of conduct or its equivalent;

0 points – If the sustainability report or other corporate document or information found on the website is supplemented only by a general written form without a clear reference to integrity and anti-corruption;

4) Does the company’s code of conduct / anti-corruption policy explicitly apply to all employees?

1 point - If the policy explicitly mentions that it applies to all employees, regardless of their position in corporate hierarchy. There can be no exceptions for any country of operations;

0 points – If the document identifies employee groups or does not foresee any targeting group.

5) Does the company’s publicly available Code of Conduct / Code of Ethics / Anti-corruption policy explicitly apply to all company representatives (agents) and other intermediaries?

1 point - If such persons must comply with the policy;

0,5 point - If the representatives of the company (agents) are encouraged not to violate the provisions of the document;

0 points – If such application is not foreseen;

** Agents and intermediaries are entities that use the name of the company or represent the company.*

6) Does the company’s publicly available Code of Conduct / Code of Ethics / Anti-corruption programme apply to non-controlled natural or legal persons or entities that provide goods or services under contract (for example: contractors, subcontractors, suppliers)?

1 point - If such persons must comply with the policy;

0,5 point – If such persons/entities are only ‘encouraged’ to comply with the policy;

0 points – If such application is not foreseen;

7) Does the company publicly announce about an anti-corruption training programme for its employees?

1 point - If it is publicly announced that such a programme is in place and that such a program is accessible to all employees;

0,5 point – If there is publicly available information on more general ethical, social responsibility, etc. related training provided to the employees;

0 points – If such information is not published;

8) Does the company publicly announce its policy on gifts, hospitality and travel expenses?

1 point - If the company has a policy regulating the offer, giving and receipt of gifts, hospitality or travel expenses. The clarification of these aspects can range from one sentence to a detailed explanation with quantitative indicators;

0,5 point – If only the permissible / impermissible acceptance of gifts is explained, but there is no provision regarding the offer of a gift or vice versa;

0 points – If such information is not published;

9) Is there a policy that explicitly prohibits facilitation payments?

*‘Facilitation payments’ are low value, unofficial payments that are made on the basis of the routine task that an enterprise has / can get under the law *)*

1 point - If there is an explicit and publicly announced prohibition and not only simple inciting of such payments (recognising that exceptions may be made for life or health threatening situations);

0,5 point - If there is no clear provision, for e.g, there is no explicit mention of a facilitation payment, but there is a description of a similar situation. Nevertheless, the prohibition must be clear;

0 points - If such information is not provided;

** Not giving a bribe in this case cannot be assimilated to non-paying of facilitation payment.*

10) Does the company publicly declare that all employees and others can raise concerns and report violations of policies of the company without risk of reprisal?

1 point - If the policy of the company publicly and explicitly specifies that no employee will suffer demotion, penalty or other reprisals for raising concerns or reporting violations (whistle-blowing);

0,5 point - If the system of reception and processing of the reports and relevant whistle-blowers protection systems apply only to the particular group of employees;

0 points – If such prohibition is not published.

11) Does the company provide a channel through which employees can report suspected breaches of anti-corruption policies, and does the channel allow for confidential reporting (whistle-blowing)?

1 point - If there is public provision of such a channel in a form that assures full confidentiality and security of the whistle-blower;

0,5 point – If there is a “third party” providing the opportunity to report and there is no clear and public approval of confidentiality, security / trust assurance;

0 points – If such information is not provided.

12) Does the company carry out regular monitoring of its anti-corruption programme to review the programme’s suitability, adequacy and effectiveness, and implement improvements as appropriate?

1 point - If there is public information on regular or continuous monitoring of the anti-corruption programme

0,5 point – If there is information on regular or continuous monitoring, but there is no information on regularity and / or if there are information on monitoring of other aspects of social responsibility and information related to the monitoring of corrupt practices;

0 points – If such information is not provided.

** Monitoring in this case is understood as regular monitoring of the Code of Conduct / Code of Ethics, such as regular discussions with employees on the implementation of the Code, regular training of employees or presentations on the implementation of the Code. Also, regular attestations or inspections of the employees’ knowledge of the Code.*

13) Does the company have a policy on political contributions that either prohibits such contributions or if it does not, requires such contributions to be publicly disclosed?

1 point - If the company announces a procedure that does not support the support of political parties / forces or the full disclosure of all information related to political party / force sponsorship in all jurisdictions of the company’s business;

0,5 point - If the company discloses all information relating to the sponsorship of political parties in its country of registration or in its main jurisdictions

0 points – If such information is not provided.

II. Organisational Transparency (OT)

14) Does the company disclose a full list of its shareholders (legal entities)?

1 point - If a complete list of such legal entities is publicly available;

0,5 point - If the list of main / selected legal entities is publicly announced;

0 points - If there is no publication of such list.

If the company indicates on its website that it does not have shareholders (legal entities), then the company receives 1 point.

15) Does the company disclose a complete list of its subsidiaries on whose activities the company may have a direct or indirect decisive influence?

1 point - If a complete list of subsidiaries has been published; or if there is a list of significant subsidiaries and the term “significant” is explicitly clarified.

0,5 point – If there is a list of significant subsidiaries, but the criteria for listing the company are not explained and the term “significant” is not explicitly clarified;

0 points - If there is only a list of first-tier (direct) subsidiaries; or if only the list of subsidiaries of the country of main establishment and activity has been published.

Terms:

- **The decisive influence on the company** - the right to manage the financial and economic activities of the company in order to benefit.

- **The decisive influence** is determined by the number of votes held by the parent company at the general meeting of shareholders of another company.

- **Parent company** - a company which may directly or indirectly have a decisive influence on another company.

If the company indicates on its website that it does not have subsidiaries, this question is not applied and the points are not taken into account within overall assessment.

16) Does the company disclose the owned portion (%) of its subsidiaries?

of points - See guidance for question 15;

If the company indicates on its website that it does not have subsidiaries, this question is not applied and the points are not taken into account within overall assessment.

17) Does the enterprise disclose the country of establishment of its subsidiaries?

of points - See guidance for question 15;

If the company indicates on its website that it does not have subsidiaries, this question is not applied and the points are not taken into account within overall assessment.

18) Does the enterprise disclose the countries of operation of its subsidiaries?

of points - See guidance for question 15;

If the company indicates on its website that it does not have subsidiaries, this question is not applied and the points are not taken into account within overall assessment.

19) Does the company disclose a complete list of its associated companies?

1 point - If a complete or significant list of such companies is publicly available;

0,5 point - If the list of main / selected companies is publicly announced;

0 points - If such list is not provided.

Terms:

- **An associate company** - a company that can be significantly influenced by another company and is neither a subsidiary of that entity nor a company acting under a joint activity (partnership) contract.

- **Significant impact on the company** - the possibility of not having a decisive impact on the company's involvement in the adoption of its financial and economic decisions.

- **Determination of significant impact** - the most significant impact is when an enterprise holds shares of another company, giving at least 20 percent of the votes in the General Meeting of Shareholders (there are additional features).

20) Does the company disclose the owned portion (%) of its associated companies?

of points - See guidance for question 19;

If the company indicates on its website that it does not have associated companies, this question is not applied and the points are not taken into account within overall assessment.

21) Does the company disclose the country of establishment of its associated companies?

of points - See guidance for question 19;

If the company indicates on its website that it does not have associated companies, this question is not applied and the points are not taken into account within overall assessment.

22) Does the enterprise disclose the countries of operation of its associated companies?

of points - See guidance for question 19;

If the company indicates on its website that it does not have associated companies, this question is not applied and the points are not taken into account within overall assessment.

III Financial Transparency and Accountability (FT)

23) Does the company publish its income/ sales in Lithuania?

1 point - If the company publishes its detailed sales income by activity and other fields in Lithuania;

0,5 point - If such information is provided but not detailed;

0 points - If such information is not published;

24) Does the company publish its investments in fixed assets in Lithuania?

1 point - If the company publicly announces investment in fixed assets in Lithuania;

0 points - If such information is not published;

25) Does the company publish its profit before tax?

1 point - If the company publishes the amount of its profit before tax in Lithuania and / or; If the company publishes its net profit and profit tax;

0 points - If such information is not published;

26) Does the company publicly disclose its income tax paid in Lithuania?

1 point - If the company publishes income tax actually paid in Lithuania;

0 points - If such information is not published.

27) Does the company make public its contribution to the community in Lithuania?

1 point - If both the financial value of the contribution to the community and the list of beneficiaries are published and / or if both the financial value of the contribution to the community in Lithuania is published as well as a detailed description of the projects;

0,5 point - If at least one of these elements are published: the financial value of the contribution to the community or the list of beneficiaries; and / or if at least one of the following elements is published: the financial expression of the community contribution in Lithuania and / or the detailed description of the projects;

0 points - If such information is not published.

Annex 2: Detailed ranking of companies including annual income | 2016

POSITION	COMPANY NAME	OVERALL RATING	OVERALL IMPROVEMENT DURING THE STUDY	RATING FOR TRANSPARENCY OF ANTI-CORRUPTION PROGRAMS	IMPROVEMENT ON TRANSPARENCY OF ANTI-CORRUPTION PROGRAMS	ORGANISATIONAL TRANSPARENCY	IMPROVEMENT ON ORGANISATIONAL TRANSPARENCY	FINANCIAL TRANSPARENCY	IMPROVEMENT ON FINANCIAL TRANSPARENCY	INCOME, 2016 (thousand Euro)
1	Tele2, UAB	100%	+98%	100%	+92%	100%	+100%	100%	+90%	177588
2	Telia Lietuva, AB	98%	+2%	100%	+4%	100%	0%	90%	0%	204065
3	Maxima LT, UAB	96%	+67%	92%	+46%	100%	+89%	100%	+80%	1503415
4	Lietuvos draudimas, AB	95%	+47%	92%	+46%	100%	+78%	100%	0%	171770
5-6	Swedbank, AB	94%	+7%	92%	0%	94%	+22%	100%	0%	184423
5-6	SEB, UAB	94%	+2%	92%	0%	100%	+6%	90%	0%	173531
7	Lietuvos energijos gamyba, AB	93%	+22%	88%	+23%	100%	+20%	100%	+20%	151758
8	Lietuvos geležinkeliai, AB	91%	0%	100%	0%	78%	0%	90%	0%	406200
9-10	Circle K Lietuva, UAB	89%	+86%	100%	+92%	100%	+89%	60%	+60%	356201
9-10	Lietuvos dujų tiekimas, UAB	89%	+30%	81%	+15%	100%	+80%	100%	+20%	195386
11	Orion Global Pet, UAB	79%	+31%	85%	+8%	100%	+80%	60%	+60%	213644
12	Energijos skirstymo operatorius, AB	74%	0%	65%	0%	80%	0%	90%	0%	650063
13	Orlen Lietuva, AB	54%	0%	15%	0%	89%	0%	90%	0%	3216158
14-15	Bitė Lietuva, AB	41%	+41%	85%	+77%	0%	0%	0%	0%	150606
14-15	Kesko Senukai Lithuania, UAB	41%	+37%	77%	+69%	0%	0%	20%	0%	351693
16	Sicor Biotech, UAB	31%	0%	62%	0%	0%	0%	10%	0%	195216
17-19	Mars Lietuva, UAB	30%	+30%	46%	+38%	0%	0%	40%	+40%	150713
17-19	Nemuno vaitinė, UAB	30%	+28%	50%	+42%	11%	+11%	10%	0%	164346
17-19	Rokiškio sūris, AB	30%	0%	0%	0%	44%	0%	80%	0%	205058
20	Thermo Fisher Scientific Baltic	28%	+22%	8%	+8%	56%	+44%	30%	+20%	176677
21-24	Achema AB	26%	+22%	27%	+27%	11%	+11%	50%	+30%	359253
21-24	Vilniaus energija, UAB	26%	+15%	31%	+31%	11%	0%	40%	0%	151058

21-24	Linus Agro, UAB	26%	0%	0%	0%	78%	0%	0%	0%	390412
21-24	Eurovaistinė, UAB	26%	0%	46%	0%	11%	0%	0%	0%	206266
25	Lifosa, AB	24%	0%	12%	0%	11%	0%	80%	0%	367421
26-27	Kauno grūdai, AB	9%	0%	8%	0%	11%	0%	10%	0%	304984
26-27	Rimi Lietuva, UAB	9%	0%	4%	0%	11%	0%	20%	0%	313545
28-29	Norfos mažmena, UAB	7%	0%	0%	0%	11%	0%	20%	0%	409920
28-29	SBA Baldu Kompanija, UAB	7%	0%	0%	0%	22%	0%	0%	0%	351118
30-31	Palink, UAB	6%	0%	0%	0%	11%	0%	10%	0%	632499
30-31	Rivona, UAB	6%	0%	0%	0%	11%	0%	10%	0%	384043
32-35	Agrochema, UAB	4%	0%	0%	0%	11%	0%	0%	0%	163633
32-35	Agrokoncerno grūdai, UAB	4%	0%	0%	0%	11%	0%	0%	0%	230735
32-35	Sanitex, UAB	4%	0%	0%	0%	0%	0%	20%	0%	480508
32-35	Top Sport, UAB	4%	0%	0%	0%	0%	0%	20%	0%	229531
36-37	Agrorodeo, UAB	2%	0%	0%	0%	0%	0%	10%	0%	376929
36-37	Limedika, UAB	2%	0%	0%	0%	6%	0%	0%	0%	168993
38-49	ACC Distribution, UAB	0%	0%	0%	0%	0%	0%	0%	0%	180158
38-49	AMIC Lietuva, UAB	0%	0%	0%	0%	0%	0%	0%	0%	206072
38-49	AVAD Baltic, UAB	0%	0%	0%	0%	0%	0%	0%	0%	166415
38-49	Baltic Agro, UAB	0%	0%	0%	0%	0%	0%	0%	0%	161087
38-49	Baltic Petroleum, UAB	0%	0%	0%	0%	0%	0%	0%	0%	198384
38-49	BOEN Lietuva, UAB	0%	0%	0%	0%	0%	0%	0%	0%	156844
38-49	EVD, UAB	0%	0%	0%	0%	0%	0%	0%	0%	176393
38-49	Girteka Logistics, UAB	0%	0%	0%	0%	0%	0%	0%	0%	432807
38-49	Mineraliniai vandenys, UAB	0%	0%	0%	0%	0%	0%	0%	0%	152592
38-49	Neo Group, UAB	0%	0%	0%	0%	0%	0%	0%	0%	349989
38-49	Silberauto, UAB	0%	0%	0%	0%	0%	0%	0%	0%	239283
38-49	Viada, UAB	0%	0%	0%	0%	0%	0%	0%	0%	201075



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