

GUIDELINES FOR THE DETECTION AND PREVENTION OF FOREIGN BRIBERY

**FOR COMPANIES DEVELOPING
ACTIVITIES AND/OR OPERATING
ABROAD**

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If you encounter signs of corruption, please report it to:

Special Investigation Service (STT)
of the Republic of Lithuania:
<https://stt.lt/en/report-about-corruption/7380>
tel. +370 526 63 333

The host country's anti-corruption
authority (an institution analogous
to the STT, if one exists)

The host country's law enforcement
authority (e.g., the police) by phone
or in person at a law enforcement
office

A diplomatic mission or consular
post of the Republic of Lithuania

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Introduction

Corruption is a complex social, political and economic phenomenon without borders that can affect all countries. One of its forms is bribery of foreign public officials in international business transactions (hereinafter – foreign bribery). Such conduct distorts fair competition, harms a country's reputation, disrupts the functioning of international markets and may lead to serious consequences – financial sanctions, termination of contracts, criminal prosecution of company managers or employees, and long-term reputational losses.

Foreign bribery threatens not only the transparency of public governance and public trust, but also directly affects the business environment and business continuity.

Involvement in corrupt arrangements can have long-term consequences that often outweigh any short-term benefit gained from shady transactions. While the harm of corruption to the state and society is often emphasized, businesses also suffer negative consequences:



Risk of legal liability: a company or its representatives may be held criminally liable both in the Republic of Lithuania and abroad, even if the violation was committed outside Lithuania. Lithuanian criminal law applies under universal jurisdiction – liability for foreign bribery arises regardless of whether the conduct is criminalized in the foreign state.



Reputational risk: damage to a company's reputation may result in loss of clients and business partners, a drop in share value and withdrawal of investors. Even allegations of corruption that become public may delay strategic decisions, restrict expansion opportunities and reduce trust in the company nationally and internationally.



Financial risk and reduced development opportunities: a company may face difficulties attracting financing from banks or investors, limiting its ability to implement strategic projects, expand into new markets, innovate or attract highly qualified employees. Legal proceedings, internal investigations, compensation of damage or imposed fines generate additional costs that often exceed the costs of preventive measures. Over time, this leads to stagnation and reduced competitiveness in both national and international markets.

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In light of these circumstances, the Guidelines for the detection and prevention of foreign bribery for companies developing activities and / or operating abroad (hereinafter – the Guidelines) are designed for Lithuanian private-sector companies and state- or municipality owned enterprises (hereinafter – companies) that operate abroad, establish international business relationships, cooperate with foreign publicsector institutions or officials, participate in international public procurement or investment projects.

Purpose of the Guidelines

- to help companies identify foreign bribery risks in a timely manner;
- to create and implement an effective foreign bribery prevention policy;
- to ensure compliance with legal acts, international commitments and good business ethics practice.

By implementing the Guidelines, companies can reduce the likelihood of legal, reputational and financial losses, strengthen resilience and increase their ability to achieve long-term success in international markets.



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I. FOREIGN BRIBERY: CONCEPT AND LIABILITY

Lithuania's commitments to ensure the prevention and investigation of foreign bribery were assumed upon ratification of the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (hereinafter – the OECD Anti-Bribery Convention or the Convention). It is the main international instrument aimed at combating bribery in international business transactions and obliges states to enforce liability for such offences.

Under the Convention, **foreign bribery** means situations where any person intentionally offers, promises or gives any undue pecuniary or other advantage, whether directly or through intermediaries, to a foreign public official, for that official or for a third party, in order that the official act or refrain from acting in relation to the performance of official duties, in order to obtain or retain business or other improper advantage in the conduct of international business; it also includes complicity in bribing a foreign public official, including incitement, aiding and abetting or authorization an act of bribery of a foreign public official, as well as attempt and conspiracy to bribe a foreign public official.

“Any person” means:

- any natural or legal person acting on their own behalf;
- any natural or legal person acting on behalf of another natural or legal person.

“International business” means:

- any commercial activity that crosses national borders;
- any business or industry sector (transport, tourism, banking, advertising, construction, investment, retail, wholesale, etc.).

“Foreign public official” means:

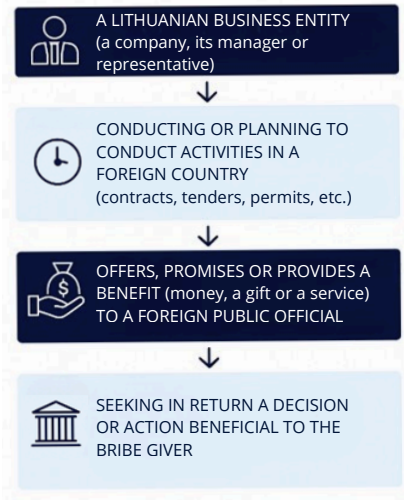
- any person holding a legislative, administrative or judicial office of a foreign state, whether appointed or elected;
- any person exercising a public function for a foreign state, including for a public agency or public enterprise;
- any official or agent of a public international organisation.

The OECD Anti-Bribery Convention is considered one of the most important anti-corruption instruments, as the 46 signatory states account for about two thirds of global export markets and about 90% of total outward foreign direct investment flows.

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TYPICAL FOREIGN BRIBERY SCHEME



Lithuania, like other states that have ratified the OECD Anti-Bribery Convention, has committed to:

- criminalise the offering, promise or giving of a bribe to a foreign public official;
- ensure that criminal liability applies to both natural persons and legal entities;
- apply sanctions that are effective, proportionate and dissuasive;
- confiscate proceeds obtained from corrupt transactions or property of equivalent value;
- ensure effective international cooperation in investigating and prosecuting such offences.

In Lithuania, criminal liability for foreign bribery is established in the Criminal Code of the Republic of Lithuania (hereinafter – the Criminal Code). It is important to know that under Article 7 of the Criminal Code, persons are liable under this Code regardless of their citizenship and place of residence, the place where the offence was committed, and whether the act is punishable under the law of the place of commission, where they commit an offence provided for in Article 227 of the Criminal Code (Bribery).



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Bribery

(Article 227 of the Criminal Code)

A person, directly or indirectly, personally or through an intermediary, offered, promised, agreed to give, or gave a bribe to a public official or a person equivalent to a public official, or to a third party, in exchange for the desired lawful or unlawful act or omission of the public official or equivalent person in the exercise of their powers, or in order to obtain preferential treatment or that person's favoritism, regardless of how the public official understood the person's actions.

Intermediary

A natural or legal person who maintains a link between the parties to business transactions, for example, a sales agent, consultant, supplier, distributor, subcontractor, franchisee, partner, subsidiary, as well as a lawyer or an accountant. Intermediaries may be legitimate participants in the supply chain of goods or services, or they may be used as a means to conceal illicit payments, making it more difficult to identify the true origin and destination of payments or services, or to hide links between beneficiaries and decision-makers. Intermediary activity in this area is particularly high-risk: it may be used to disguise illicit payments and therefore must be assessed strictly in line with the principles of transparency, accountability, and due diligence.

Bribe

Any unlawful or unjustified remuneration, expressed in the form of property-related or other personal benefit for oneself or another person (material or non-material, having economic value on the market or having no such value), in exchange for the desired lawful or unlawful act or omission of a public official or a person equivalent to a public official in the exercise of their powers.

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Example A: Your company is involved in an infrastructure project in a foreign country. In order to ensure that the competent authority makes a favourable decision on additional funding for the project, one of the company's executives offers to cover the travel expenses of a foreign official's family member. In this way, the aim is for the official to use their powers and secure a decision beneficial to your company. This constitutes an offer of a bribe, which is considered a criminal offence in Lithuania.

Example B: Your company wants to expand and, for this purpose, the management decides to establish a branch in country X. Based on publicly available information, the process of establishing a company in country X is very complex and may take longer than a year. Your goal is for the branch to start operating as soon as possible. However, you learn that other foreign companies have been entered in the company register without fulfilling all mandatory requirements, and that the process was expedited by paying an unlawful sum of money to the relevant official.

You understand this as a common practice in country X and instruct your project manager to make a similar offer to a competent foreign public official. The offer is made in exchange for an act that is contrary to the foreign official's duties—registering the company without meeting all legal requirements. It does not matter whether the money is actually handed over: an offer or promise alone is sufficient. This is also a bribery of a foreign public official, which is considered a criminal offence in Lithuania.



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Check your answers:

<p>Would the situation be assessed differently under the law if, instead of money, tickets to an event were offered to a foreign official?</p>		<p>A bribe can be anything—from a valuable gift to a service—therefore not only money, but also the provision of any other type of benefit is considered an act of bribery.</p>
<p>Would the situation be assessed differently under the law if it was not your company’s representative who offered the “reward”, but the foreign official who requested it?</p>		<p>If a company complies with a foreign official’s request, under the laws of the Republic of Lithuania it is considered to have committed the offence of bribing a foreign public official.</p>
<p>Would the situation be assessed differently under the law if, instead of approaching the foreign official directly, the company’s representative authorised a local intermediary to “arrange” the registration within a few weeks in return for a certain fee?</p>		<p>Bribery through an intermediary is also a criminal offence. Indirect bribery covers situations where the bribe is transferred via an intermediary, i.e., the bribe-giver and the bribe-recipient do not meet or communicate physically or directly, but the intermediary transfers money, goods, services or other benefits. Liability applies to all participants in the unlawful transaction chain—the bribe-giver, the bribe-recipient, and the intermediary are all held liable.</p>
<p>Would the situation be assessed differently under the law if you did not yet intend to establish a branch in country X, but—anticipating a possible future need—asked an intermediary to deliver a gift each year to a foreign official who might be able to help?</p>		<p>Gifts are normally given without expecting anything in return; however, depending on to whom and for what purpose the gift is given, it may be regarded as an unlawful benefit or a bribe, including in cases where it is given not for a specific act or omission, but for favourable treatment in the future.</p>

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For almost a year, the company took all the necessary legal steps to have its branch registered in country X. All that remains is to approve the required documents and register the company—both of these formalities take a long time in country X. Due to the heavy workload of the competent authority, a further delay of several weeks is also possible. In order to speed up the process, you send a certain sum of money to the responsible foreign official.



Payment for the desired lawful act of an official in the exercise of their powers constitutes bribery.

Eventually, the company's branch in country X was registered and is now operating. It is participating in a public procurement procedure announced by the local authorities. Winning such a large contract so soon after establishment would be a major success for the company. The branch attempts to influence the decision on winning the tender by paying a certain sum of money to a local government official. This action becomes public. In response to media inquiries, the company's headquarters in Lithuania states that all parts of the company comply with the company's code of conduct, which provides that all forms of corruption are unacceptable. If the branch in country X nevertheless offered a bribe, it did so without the knowledge or instruction of the headquarters. Therefore, in Lithuania the company claims that it cannot be blamed for unlawful actions. Are these arguments sufficient?



Actions carried out by intermediaries and company branches are considered to have been carried out by the company. Therefore, the company cannot avoid liability.

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Your company's branch in country X participated properly in the above-mentioned public tender procedure, and its bid was assessed favourably. Nevertheless, the city authorities selected a less advantageous bid submitted by a company from country Y. Leaked information revealed that the bid was accepted due to bribery committed by your competitor. What can you do?



Depending on the circumstances, it may be appropriate to file a complaint challenging the decision under the laws of country X. It is also possible to report the matter to the authority responsible for investigations or to the anti-corruption agency. If this act of bribery constitutes a criminal offence in country X or in your country, a report may be submitted in either of these countries. If you are unsure how to report it, contact the Special Investigation Service of the Republic of Lithuania (hereinafter – the STT). Lithuanian law enforcement authorities may contact the competent authorities of the relevant country, depending on the specific circumstances.

Given that liability for foreign bribery may arise both under the criminal law of the place where the bribery occurs and under the national criminal law of the Republic of Lithuania, it is particularly important for companies to familiarise themselves with these Guidelines and to apply them consistently in practice, in order to ensure lawful and transparent operations and to protect themselves from potential legal, reputational and financial harm.



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II. WHEN COMPANIES MAY FACE FOREIGN BRIBERY RISKS

Before starting activities abroad, companies are recommended to assess the legal environment of the foreign country, transparency standards and possible corruption risks.

Useful information on local preventive measures, legal regulation, political and economic situation and business ethics specifics may be provided by diplomatic missions of the Republic of Lithuania (a contact list is provided in the Appendix to the Guidelines).

In the initial assessment, it is recommended to evaluate the risk level of the environment in which the company plans to operate:



Activities in high-risk sectors. In sectors like energy, construction, infrastructure or healthcare, business success often depends on permits or contracts issued by foreign public officials. This increases the likelihood of corruption-related conduct.



Business linked to foreign governments through local agents or suppliers, where the use of local intermediaries is common. Partners who offer to “speed up” processes or ensure favourable decisions may use bribery or trading in influence as a means of action.



Transactions involving foreign public officials, such as participation in tenders or obtaining required permits, or transactions related to public contracts. There is a risk of receiving requests for remuneration for a “service” or decision – and this does not necessarily take the form of money. Bribes may also include travel, events, entertainment and gifts as an incentive for the decision-maker.



Unusual payment methods or contract terms in a foreign country or using intermediaries. Where payments are made for intermediation, it is important to assess their circumstances and compliance with local laws. Cash payments, offshore accounts, complex or atypical settlement schemes, unusually large advance payments or additional conditions may conceal bribes, money laundering or breaches of international sanctions.

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The business practice in the country of making donations to political or social initiatives. It is important to know what corporate social responsibility (CSR) programs are applied in the foreign country and how it is ensured that they are not used as a tool for bribery through a third party. Even if support is granted to a lawfully operating organization, it may be linked to a decision-maker or their interests and become an indirect form of bribery.



An unfavorable political climate and systemic corruption environment. A high level of corruption in the country, political instability, and weak enforcement of laws create fertile ground for non-transparent transactions. This increases the risk of becoming involved in illegal schemes, suffering financial losses, and losing the ability to operate in the market.

Before entering a new market, you should systematically assess the foreign country's legal and business environment. In light of the potential corruption risks identified during the analysis, it is recommended to implement a company anti-corruption prevention policy tailored to the specific country and sector context, covering the key elements relevant to preventing foreign bribery.

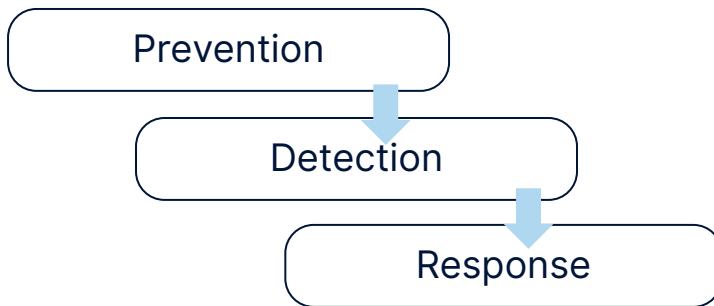
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III. IMPLEMENTING A FOREIGN BRIBERY PREVENTION POLICY

Foreign bribery, like other forms of corruption, is not acceptable business practice either in international or domestic markets, regardless of local traditions or economic circumstances. To ensure transparent and responsible activities abroad and to prevent foreign bribery, it is recommended to have a clear foreign bribery prevention policy that is applied consistently, and is proportionate to the company's size, sector, geography and identified risks. Such a policy may be integrated into the company's overall compliance programme, corruption prevention policy, or prepared as a separate document.

According to best international practices, a company's foreign bribery prevention policy should focus on three main objectives:



3.1. PREVENTION

A company's prevention to corruption risks depends on its preparedness to implement preventive measures that pre-empt potential incidents in the future.

For a successful corruption prevention policy (including foreign bribery), clear, visible and consistent management commitment is essential ("Tone from the top"). It is the management, which shapes the company's values and standards of conduct that apply to employees, business partners and supply chain participants.

It is also important to ensure that the policy is not merely a formal document, but is genuinely applied in practice, communicated to employees on an ongoing basis,

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regularly updated, and implemented across all areas of the company's operations and in all jurisdictions in which it operates.

It is recommended that the policy cover all controlled subsidiaries (both in Lithuania and abroad) and be applied to supply chain participants, especially those operating in foreign markets (contractual compliance obligations).

3.1.1. Managing Foreign Bribery Risks

An effective corruption prevention policy must be based on systematic risk management. Only by clearly understanding the areas of greatest threat can a company take targeted and proportionate measures to ensure transparent activities domestically and internationally.

Identifying corruption risks is a key step in building corruption prevention. The purpose is to determine areas of activity, processes or situations that may create preconditions for corruption. The process must be based on the actual context of company's activities, taking into account sector specifics, company size, the nature of transactions and the geography of operations. Risk data may be collected in various ways: employee surveys, analysis of data and documents, interviews with suppliers and clients, and SWOT analysis (assessment of strengths, weaknesses, opportunities and threats).

In the context of foreign bribery prevention, it is particularly important to pay attention to "red flags" that may signal potential corruption risks. Such red flags are most often related to:

- 🚩 the country;
- 🚩 partners;
- 🚩 intermediaries' activities;
- 🚩 hospitality, gifts, free of charge trips and entertainment;
- 🚩 financial payments.

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In the context of foreign bribery, the OECD **“Good Practice Guidance on Internal Controls, Ethics and Compliance”** (set out in **Annex II** to the OECD Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions), also encourages companies to put in place ethics and compliance programmes or measures designed to prevent and detect foreign bribery, drawing attention to the following key high-risk areas that should be regulated:

<ul style="list-style-type: none"> • gifts; • hospitality, entertainment and expenses; • travel, including customer travel; • political contributions; • charitable donations and sponsorships; • facilitation payments; 	<ul style="list-style-type: none"> • solicitation and extortion; • conflicts of interest; • hiring processes; • risks associated with the use of intermediaries, especially those interacting with foreign public officials; • respond to public calls for tender, where relevant.
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¹ <https://legalinstruments.oecd.org/en/instruments/oecd-legal-0378>



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All of the areas listed constitute a core, but non-exhaustive set of measures—they may be supplemented depending on the specific risk profile, country, and sector.

<p>A country risk assessment helps to determine the level of transparency of its operating environment, plan additional measures to ensure smooth operations, and decide whether it is advisable to enter a particular market.</p> <p>A consistently applied country risk analysis, embedded in the company's policies, reduces the likelihood of legal, financial, and reputational losses in the international marketplace.</p> <p>Country-related risks:</p>	<ul style="list-style-type: none"> • The Corruption Perceptions Index (CPI) score, which indicates the perceived level of public sector corruption in countries and territories around the world. The index is presented on a 0–100 scale (100 = very clean country, 0–19 = highly corrupt) and is compiled based on surveys of business representatives and expert assessments. Countries with a CPI below 50 are considered to pose a high corruption risk, while countries with a CPI below 30 are considered particularly high-risk. • An unstable political environment, weak enforcement, insufficient independence of the judiciary and law enforcement, and widespread bribery practices increase the risk of indirectly becoming involved in unlawful arrangements. • Frequency of changes in the regulatory framework. Frequent and unpredictable amendments to laws or procedures, short transition periods, and inconsistent application increase discretion and uncertainty, creating conditions conducive to corruption. • Vulnerability of the intended sector of business activities in the country. Sectors that often carry elevated risk include energy, construction, infrastructure, and healthcare, as these areas are characterized by high-value public procurement, a large number of licences and permits, and intensive interaction with contracting and regulatory authorities.
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	<ul style="list-style-type: none"> • Contacts with public officials are unavoidable, and “facilitation payments” are common. <p>In countries assessed as high-risk or very high-risk, it is recommended to implement enhanced internal controls, restrict or discontinue cash payments, clearly regulate interactions with public officials, apply mandatory due diligence for transactions and partners, and increase the frequency of internal audits.</p>
<p>Partner-related risks:</p>	<ul style="list-style-type: none"> • Companies that disclose little information about themselves publicly (their management, shareholders, and corporate structure are not clear). • Companies operating in the energy, construction, infrastructure, and healthcare sectors—where the risk of corruption-related misconduct is higher—lack risk management and compliance programmes. • The company is managed by, or ownership rights in the company are held by, a public official or a politician. • A public official or a politician strongly recommends a particular company. • Companies registered in preferential tax jurisdictions (companies in “tax havens”). • Companies that have previously engaged in illegal or suspicious activities and continue not managing corruption risks. • Foreign companies offer large-scale cooperation and business development opportunities, but have little relevant experience and are not well known in this line of business.

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	<ul style="list-style-type: none"> • Companies seeking unusual payment arrangements, such as unusually high commissions, success fees, or cash payments. • Companies avoid written contracts or propose signing agreements that do not meet the standards expected in business and the public sector. • When expanding business into foreign countries, local agents are engaged who offer, for a fee, to accelerate the business expansion process. • Foreign companies support charities linked to public officials or politicians, or maintain relationships with such charities.
<p>Risks related to the use of intermediaries:</p> <p>Intermediaries may be either natural persons or legal entities, such as, for example, agents, sales representatives, business consultants or consulting firms, suppliers, distributors, resellers, subcontractors, franchisees,</p>	<ul style="list-style-type: none"> • Insufficient or inappropriate qualifications of the intermediary, lack of relevant experience, and a poor reputation in a particular market segment. • The intermediary does not offer similar services at a similar price to other clients. • Intermediaries share a director(s) and/or owner(s), and/or are otherwise connected to the contracting company's management bodies. • Intermediaries' involvement in the company's transactions and/or payments to intermediaries. • The intermediary cooperates with public officials.

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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joint venture partners, subsidiaries, and other business partners, including lawyers and accountants.

Intermediaries may operate as a channel for legitimate economic activity, as an illicit channel for bribery payments, or as a combination of both.

- A consultant acting as an intermediary issues the company with false invoices for fictitious services, and the company pays the consultant.
- A consultant acting as an intermediary provides services, including unlawful ones, for example obtaining restricted-access information about a public procurement procedure, which is later used to prepare a bid.
- Services and deliverables are described vaguely.
- Transactions are concluded with a shell company or through a shell company.
- Part of the transaction is concluded at the request of a public official.
- High commission fees (which may be used as “cash funds” to bribe foreign public officials).
- Advance fees.
- Urgent payments.
- Cash payments.
- Payments in several smaller amounts.
- Payments to personal accounts.
- Payments to offshore accounts and/or payments to funds.

If you encounter signs of corruption, please report it to:

Special Investigation Service (STT) of the Republic of Lithuania:
<https://stt.lt/en/report-about-corruption/7380>
 tel. +370 526 63 333

The host country's anti-corruption authority (an institution analogous to the STT, if one exists)

The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office

A diplomatic mission or consular post of the Republic of Lithuania



<p>Risks related to hospitality, gift-giving, sponsored travel, and entertainment:</p>	<ul style="list-style-type: none"> • It is requested or expected that you meet foreign public officials or their representatives “face-to-face” in informal venues such as luxury hotels, restaurants, etc. • Trips that are not intended for legitimate business purposes; travel of foreign public officials to a location where the company has no facilities (operations); expenses of officials’ spouses that appear intended to obtain favour through corrupt means. • Tickets to events where there are no business meetings with the company. • Requests for the company to cover unjustifiably more luxurious expenses (e.g., business-class tickets). • An expectation to receive luxury gifts prior to decisions being made, or gifts that are inconsistent with local traditions or protocol. • Gifts and travel exceed the established limit.
<p>Risks related to financial payments:</p>	<ul style="list-style-type: none"> • Payments for international services significantly exceed the market price typically accepted in the relevant business. • Payments under a consulting services agreement are of a pass-through nature—funds are transferred out of the accounts shortly after they were received. • Commissions, interest, or payments under a public procurement contract are increased, reduced, or restructured in a commercially unviable manner.

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country’s anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country’s law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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- Payments are made to suppliers' accounts opened in countries other than those where the goods are delivered or the works and services are performed.
- Unjustifiably high fees for consulting or training services, especially in sectors with a higher corruption risk, such as telecommunications, infrastructure, or other state-monopolised areas.
- A natural person or legal entity pays for an individual's travel and accommodation in Lithuania and/or abroad where such payments are not typical of the payer's financial activity, etc.
- Payments under public procurement contracts are made without formalising the paperwork on acceptance and handover of goods, works, or services.
- Support (charity) is provided to the contracting authority whose public procurements are being won, or to organisations related to it.

The more red flags are identified, the more internal controls should be strengthened.



If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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Based on the risk factors that are critical to preventing foreign bribery, the company's foreign bribery prevention policy should set out:

<p>Procedures for due diligence on prospective partners</p>	<p>under which the risks of foreign bribery associated with potential business partners and intermediaries are assessed.</p>
<p>Comprehensive control of financial expenditures</p>	<p>which not only helps prevent unlawful payments but also reduces the risk of foreign bribery when payments are made to foreign public officials or through intermediaries.</p> <p>Effective financial-risk prevention includes:</p> <ul style="list-style-type: none"> • procedures ensuring that all payments are lawful both under the local laws of the foreign country and under the laws of the Republic of Lithuania. It is recommended to avoid any facilitation payments (small, unofficial payments made to a public official to speed up or secure a routine government action), as they may be interpreted ambiguously in foreign jurisdictions; • a clear definition of expense categories (travel, accommodation, meals, gifts, etc.) and the setting of value limits, as well as guidance on what constitutes appropriate, situation-specific expenses and what goes beyond the limits; • consistent application of these limits to all employees (regardless of seniority/position level); • a standardised expense approval process; • substantiation of all payments with detailed documentation including the date, amount, location, and recipient details;

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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	<ul style="list-style-type: none"> • approval of higher-value or higher-risk payments using a dual-approval mechanism (the “four-eyes principle”); • segregation of payment approval and accounting functions; • setting limits on the use of cash, avoidance of cash payments, especially abroad; • the use of centralised electronic approval systems that ensure full process traceability and auditability.
<p>Gifts, Hospitality and Entertainment Policy</p>	<p>which would include:</p> <ul style="list-style-type: none"> • procedures ensuring that gifts, benefits, and expenses are fair and proportionate and do not improperly influence decisions, as well as ensuring that gifts are a gesture of goodwill rather than a means of improper influence. It is particularly important to avoid situations where gifts or benefits may be perceived as an attempt to influence the actions of public officials; • provisions requiring to record cases where employees are asked to give gifts on behalf of another person, and a clear definition of what is socially acceptable and what may be understood as buying influence; • defined types of permissible gifts, hospitality, and entertainment; • established value thresholds for gifts, hospitality, and entertainment, as well as rules on prior approval; • defined circumstances (conditions) under which gifts, hospitality, and entertainment may be provided; • a requirement to register gifts in a gifts register.

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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<p>Travel Policy (including customer travel)</p>	<p>which would provide for:</p> <ul style="list-style-type: none"> • who should pay for travel, for whom, and under what circumstances; • which expenses are permissible; • a requirement for prior approval and full supporting documentation for expenses.
<p>Rules on Conflicts of Interests</p>	<p>which would:</p> <ul style="list-style-type: none"> • define what constitutes a conflict of interest in the context of the company's operations; • set out measures to identify, monitor, and manage such conflicts. This may cover actual, potential, and perceived conflicts of interest involving both employees and their close relatives, friends, or partners; • provide an obligation for annual updates of conflict of interest declarations.
<p>Corporate Social Responsibility (CSR) Programmes and Loan Policy</p>	<p>which would include:</p> <ul style="list-style-type: none"> • control measures ensuring that the company's corporate social responsibility (CSR) programmes or loans are not used for corruption purposes; • a clear definition of which types of programmes are permitted and which are prohibited (e.g., sponsorship, charitable donations, and political contributions); • specification of whether the company provides loans, under what conditions and to which entities, and the establishment of loan value limits; • beneficiary and conflict-of-interest due diligence; • dual approval (the "four-eyes principle"), especially for higher-value projects.

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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3.1.2. Implementing Whistleblower Protection Mechanisms

In order to strengthen prevention of potential non-compliance or incidents, it is essential for a company's policy to set clear processes and measures that allow employees and other stakeholders **to report suspected corruption and foreign bribery in a safe and confidential manner**. Information on implemented mechanisms should be made publicly available.

In certain cases, the establishment of internal reporting channels (hereinafter – an internal channel) is mandatory under Lithuanian legislation, which also sets rules for handling reports received through such channels.²

A company must enable reporting through one or more means (e.g., in person to the person responsible for the channel, by post or e-mail, through online platforms (internet or intranet), via a hotline, etc.). All reports must be registered and handled according to established procedures.

In all cases, the reporter's confidentiality must be ensured, and the corruption prevention policy must guarantee that whistleblowers will not suffer any negative consequences for providing information.



²Description of the Procedure for the Introduction of Internal Reporting Channels for the Provision of Information on Infringements and Ensuring Their Operation, approved by Resolution No. 1133 of the Government of the Republic of Lithuania of 14 November 2018 "On the Implementation of the Law of the Republic of Lithuania on the Protection of Whistleblowers" (paragraphs 5–7).

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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3.1.3. Raising Employees' Anti-Corruption Awareness

Employees' anti-corruption awareness is particularly important for effective prevention, therefore periodic training should become part of the company's strategy.

Training content should be tailored to employees' functions and the level of corruption risk.

Employees should know:

- how to recognise signs of corruption, especially in international business transactions;
- how to act when confronted with bribery;
- how to respond to demands to pay a bribe;
- what legal consequences apply for corruption-related offences in Lithuania and abroad;
- what negative consequences corruption can cause for the company;
- where to report suspected criminal offences and other corruption-related violations.

It is also worthwhile to discuss the most common justifications employees may use and how to counter them constructively.



Training should be held periodically and content shall be updated according to the latest identified risks, legal changes and actual incidents in the market. Practical methods are useful: analysis of real-life situations, simulated dialogues and discussions that help employees build practical skills.

If you encounter signs of corruption, please report it to:

Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333	The host country's anti-corruption authority (an institution analogous to the STT, if one exists)	The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office	A diplomatic mission or consular post of the Republic of Lithuania
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3.1.4 Communicating the Foreign Bribery Prevention Policy

A foreign bribery prevention policy will not work if it is only a formally approved document. It must become a common operational standard that is understood, supported and applied by everyone – from top management to a new employee.

Internal and external communication helps ensure that the policy is heard and implemented. Communication is effective when it is continuous – for example, when the policy is discussed in meetings, internal newsletters, and presented visually on boards, etc.

It is recommended to publish the foreign bribery prevention policy on the official website so that it is easily accessible to anyone interested.

3.1.5. Promoting a Culture of Integrity, Ethical Conduct and Trust

To encourage compliance with the foreign bribery prevention policy, it is necessary not only to introduce the policy and train employees on it, but also to ensure that employees feel safe: no employee should suffer harm, be punished or experience other negative consequences for refusing to pay bribes or for reporting to the board (or an equivalent body) or to law enforcement authorities.

Management must demonstrate zero tolerance for corruption and promote a culture of direct and open reporting without fear of consequences. Compliance should be mandatory for employees; it is recommended to consider recognising ethical behaviour in performance appraisals. Incentives for ethical conduct should be equivalent to incentives for commercial results.

Integrity and prevention of corruption are the result of continuous employee involvement, dissemination of information and practical training. A company that invests in consistent communication, strengthening its ethics culture and relevant training creates an environment where bribery is not only prohibited but actively not tolerated. In international operations, such an environment becomes one of the most important safeguards against legal, financial and reputational losses.

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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3.1.6. Monitoring, Evaluating and Improving the Policy

A foreign bribery prevention policy is effective when it is continuously monitored, periodically evaluated and adapted to a changing business environment, legal framework and geopolitical circumstances. The company must clearly allocate responsibilities for these processes, ensure systematic monitoring and rapid response to identified shortcomings. Management is responsible not only for initiating oversight, but also for its effectiveness – decision-making, allocating resources and fulfilling commitments.

Policy effectiveness should be assessed both periodically (at least annually) and when significant changes occur: entry into new markets, reorganisations, mergers, management changes, adoption of new legislation, or following incidents that reveal control gaps. Evaluations should analyse not only internal changes and the risks they create, but also the international context, the proportionality and effectiveness of measures, and compliance by employees and business partners with established requirements.

The continuous improvement cycle should function as a consistent process: identified shortcomings are not only corrected but also incorporated into risk management plans to prevent recurrence. For example, if an external audit finds that the whistleblowing channel is not sufficiently known to employees, additional communication measures should be implemented immediately and the issue reassessed.

In this way, the foreign bribery prevention policy becomes dynamic and applied in practice. **Systematic monitoring, clear responsibility, independent audit and continuous improvement help ensure that the company prevents corruption and foreign bribery risks, maintains its reputation and meets the highest transparency standards.**






If you encounter signs of corruption, please report it to:

Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333	The host country's anti-corruption authority (an institution analogous to the STT, if one exists)	The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office	A diplomatic mission or consular post of the Republic of Lithuania
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3.2. DETECTION

Companies' efforts to recognise manifestations of corruption abroad should include not only monitoring the external environment but also controlling internal processes.

The most common ways corruption is **detected** within companies include:

 Internal audits and inspections	 Information from whistleblowers and other sources	 Monitoring
<p>Accountants and auditors play an important role in identifying corruption within a company. If a potential violation is found, they should be encouraged to report it to management, supervisory bodies and, if necessary, relevant law enforcement authorities. It is recommended to conduct an audit after an acquisition or merger, and to audit specific procedures following a non-compliance incident.</p>	<p>Data on corrupt conduct are often received from managers, employees or former employees who refused to participate in bribery schemes. Companies should establish reliable internal reporting channels and ensure the ability to use external channels.</p>	<p>Company lawyers, accountants, procurement and HR specialists should be trained to identify "red flags" that may signal foreign bribery risks and to respond in a timely manner to potential non-compliance, following the company's established procedures.</p>

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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Forms of corruption are constantly evolving and becoming increasingly sophisticated. Therefore it is important to be able to quickly assess situations that may pose risks. Indicative questions can help assess the situation and determine whether a decision or action may bear signs of corruption:

<p><i>Is it legal?</i></p>	<p>If there are doubts how to assess the situation from a legal standpoint, the company's lawyer or compliance officer should be consulted, e.g. on how such a situation could be interpreted under Lithuanian law and the laws of the foreign country, including liability for corruption offences. It is also necessary to assess whether it is lawful in the context of the company's internal documents, such as compliance programmes and anti-corruption policy.</p>
<p><i>Is it ethical?</i></p>	<p>If there are doubts about the ethical aspect of a situation, it is advisable to assess whether the situation complies with the company's employee conduct and/or ethics code, internal rules, and declared values.</p>
<p><i>Does it harm the public interest?</i></p>	<p>If there are doubts as to whether a particular situation may be harmful to society and the state, it is advisable to check whether similar cases have been publicly reported before and how they were assessed.</p>

If you have doubts when answering the questions above, it is recommended to consult the company's responsible managers or other designated persons. In addition, if you suspect that certain actions may be contrary to legal acts regulating the prevention of corruption or may entail criminal liability for corruption-related criminal offences, you may always consult the Special Investigation Service of the Republic of Lithuania (STT).

If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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3.3. RESPONSE

A response mechanism must be established for cases of non-compliance, as this helps to strengthen prevention, properly determine the circumstances of a potential breach and prevent future violations. This is relevant for both internal and external actions.

- **Reporting to and cooperation with law enforcement**

Effective foreign bribery prevention is inseparable from timely and reliable referrals – it is not only a civic duty to report crime but also a guarantee of a company's reputation and long-term business continuity. If possible foreign bribery cases are identified, report immediately to the competent authority, which may be:

- an anti-corruption institution of the foreign country (equivalent to STT, if one exists);
- any other competent law enforcement institution of the foreign country (e.g., police or prosecution);
- a diplomatic mission or consular post of the Republic of Lithuania;
- the Special Investigation Service (STT): <https://stt.lt/pranesk>; +370 526 63 333.

A person who voluntarily provides STT with valuable information about a corruption-related offence, including bribery of foreign public officials, may be granted a monetary reward.³

When reporting, it is necessary to ensure the securing of evidence (documents, data media), restrict access to important data, temporarily suspend risky payments or actions, appoint a contact person for communication with law enforcement authorities, cooperate with them promptly by providing requested information and enabling interviews with employees, while ensuring confidentiality and whistleblower protection.

- **Defining internal and external company sanctions**

- ✓ Contracts should provide for the possibility to terminate cooperation in case of violations.
- ✓ The company should have clear incident investigation procedures in place.
- ✓ Disciplinary sanctions should be applied to employees for violations, thus demonstrating zero tolerance for corruption.

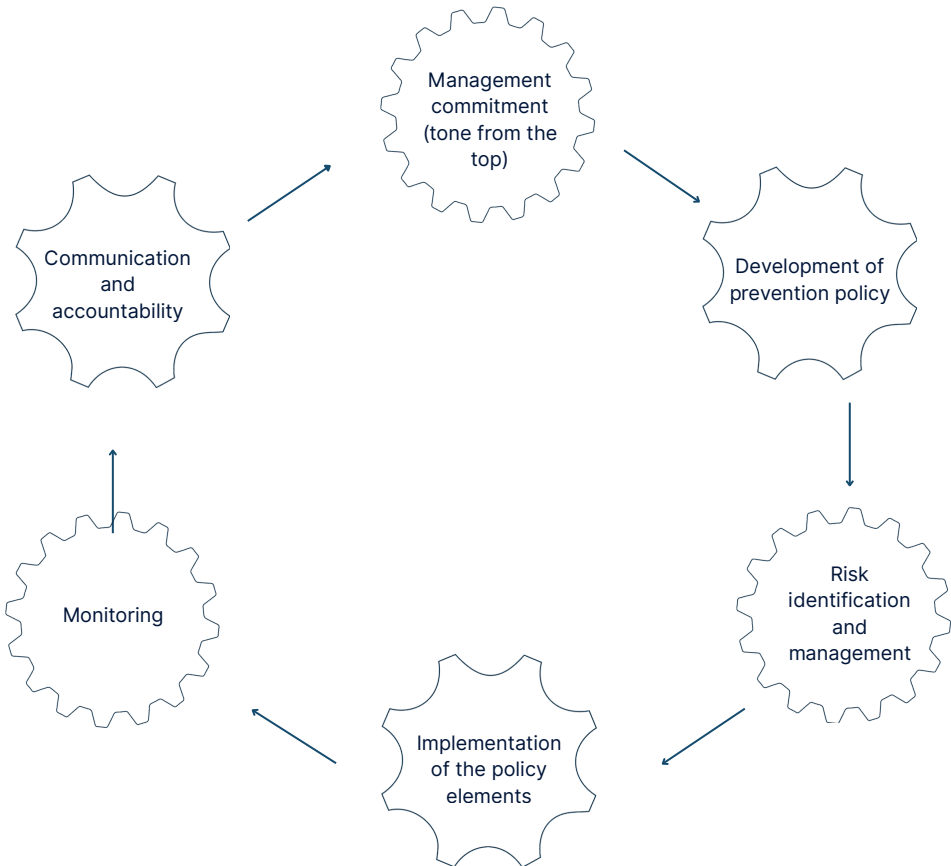
³ Order No. 2-38 of 20 January 2015 by the Director of the Special Investigation Service of the Republic of Lithuania "On Remuneration for Persons Who Have Provided the Special Investigation Service of the Republic of Lithuania with Valuable Information on Corruption-Related Criminal Offences".

If you encounter signs of corruption, please report it to:

Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333	The host country's anti-corruption authority (an institution analogous to the STT, if one exists)	The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office	A diplomatic mission or consular post of the Republic of Lithuania
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• **Internal control mechanisms**

Internal control mechanisms must be reviewed regularly, in particular in light of identified non-compliance. As mentioned, other circumstances relevant to the company's operations that drive change should also be assessed in order to ensure the company's continued prevention of corruption risks (changes in business, country or sector risks, reorganisation, merger, changes in the legal environment, etc.).



If you encounter signs of corruption, please report it to:

<p>Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333</p>	<p>The host country's anti-corruption authority (an institution analogous to the STT, if one exists)</p>	<p>The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office</p>	<p>A diplomatic mission or consular post of the Republic of Lithuania</p>
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Appendix. List of Diplomatic Missions

Country	Mission	Address	Telephone	Email	Website
Albania	Embassy of the Republic of Lithuania in the Hellenic Republic	38, Vasileos Konstantinou Ave., 11635 Athens, Greece	+30 210 72 94 357; +30 210 72 94 356	amb.gr@urm.lt	https://gr.mfa.lt
Algeria	Embassy of the Republic of Lithuania in the Kingdom of Belgium	41-43 rue Belliard, 1040 Bruxelles, Belgium	+32 2401 9895	amb.be@urm.lt	https://be.mfa.lt
Andorra	Embassy of the Republic of Lithuania in the Kingdom of Spain	Pisuerga 5, 28002 Madrid, Spain	+34 91 702 21 16	amb.es@urm.lt	https://es.mfa.lt
Angola	Embassy of the Republic of Lithuania in the Republic of South Africa	235 Grosvenor St., Hatfield 0028, Pretoria, South Africa	+27 0 12 760 9000	amb.za@urm.lt	https://za.mfa.lt
Armenia	Embassy of the Republic of Lithuania in the Republic of Armenia	2/13 Babayan Street, 0037 Yerevan, Armenia	+374 10 297 682; +374 10 297 683	amb.am@urm.lt	https://am.mfa.lt
Australia	Embassy of the Republic of Lithuania in Australia	Suite 1, 53 Blackall Street, Barton, ACT 2600, Australia	+61 484 344 338	amb.au@urm.lt	https://au.mfa.lt
Austria	Embassy of the Republic of Lithuania in the Republic of Austria	Löwengasse 47/4, 1030 Vienna, Austria	+43 1 718 5467	amb.at@urm.lt	https://at.mfa.lt
Azerbaijan	Embassy of the Republic of Lithuania in the Republic of Azerbaijan	90A Nizami str., Landmark III (15th floor), AZ-1010 Baku, Azerbaijan	+994 12 537 0407; +994 12 537 0408	amb.az@urm.lt	https://az.mfa.lt
Bahrain	Embassy of the Republic of Lithuania in the United Arab Emirates	Villa 173 Mohammed Bin Ali Al Rumaithi, Al Nahyan Camp, P.O. Box 59431, Abu Dhabi, UAE	+971 2 777 4000	wien@urm.lt	https://uae.mfa.lt
Bangladesh	Embassy of the Republic of Lithuania in the Republic of India	E-4/3 Vasant Vihar, New Delhi 110057, India	+91 11 4313 2200	amb.in@urm.lt	https://in.mfa.lt
Bosnia and Herzegovina	Embassy of the Republic of Lithuania in Hungary	Deak Ferenc utca 15, 1052 Budapest, Hungary	+36 1 224 79 10	amb.hu@urm.lt	https://hu.mfa.lt
Brazil	Consulate General of the Republic of Lithuania in São Paulo	Avenida Iral 438, cj. 34, Indianópolis, CEP 04082-001 São Paulo - SP, Brazil	+55 11 2614 8665	atendimento@mfa.lt	https://br.mfa.lt/

Appendix. List of Diplomatic Missions

Bulgaria	Embassy of the Republic of Lithuania in Romania (accredited to Bulgaria)	79-81 Popa Savu Street, district 1, Bucharest 011432, Romania	+40 213115997	amb.ro@urm.lt	https://ro.mfa.lt
Canada	Embassy of the Republic of Lithuania in Canada	150 Metcalfe Street, Suite 1600, Ottawa, Ontario K2P 1P1, Canada	+1 613 567 54 58	amb.ca@urm.lt	https://ca.mfa.lt
China	Embassy of the Republic of Lithuania in the People's Republic of China	(currently working remotely)	-	consul.cn@urm.lt	https://cn.mfa.lt
Czech Republic	Embassy of the Republic of Lithuania in the Czech Republic	Pod Klíkovkou 1916/2, 15000 Praha 5, Smíchov, Czech Republic	+42 02 572 101 22; +42 02 572 101 23	amb.cz@urm.lt	https://cz.mfa.lt
Denmark	Embassy of the Republic of Lithuania in Denmark	Bernstorffsvej 214, 2920 Charlottenlund, Denmark	+45 39 636 207	amb.dk@urm.lt	https://dk.mfa.lt
Egypt	Embassy of the Republic of Lithuania in the Arab Republic of Egypt	23 Muhammad Mazhar Str., 5th floor, Zamalek, Cairo, Arab Republic of Egypt	+20 2 2120 4705	amb.eg@urm.lt	https://eg.mfa.lt
Estonia	Embassy of the Republic of Lithuania in the Republic of Estonia	Uus tn. 15, Tallinn 10111, Estonia	+372 616 49 91	amb.ee@urm.lt	https://ee.mfa.lt
Finland	Embassy of the Republic of Lithuania in the Republic of Finland	Pohjoisranta 4 A 15, 00170 Helsinki, Finland	+358 9 6844880	amb.fi@urm.lt	https://fi.mfa.lt
Georgia	Embassy of the Republic of Lithuania in Georgia	11 Titsian Tabidze St, Tbilisi, Georgia	+995 32 222 0402	amb.ge@urm.lt	https://ge.mfa.lt
Germany	Consulate General of the Republic of Lithuania in Munich	Thomas-Wimmer-Ring 1, 80539 Munich, Germany	+49 8937040515	consulate.munich@mfa.lt	https://consulate-munich.mfa.lt/
Germany	Embassy of the Republic of Lithuania in the Federal Republic of Germany	Charitestr. 9, 10117 Berlin, Germany	+49 30 890 6810	info-botschaft@mfa.lt	https://de.mfa.lt
Indonesia	Embassy of the Republic of Lithuania in the Republic of Singapore	18 Robinson Rd. #10-01, 048547 Singapore	+65 6232 3772	amb.sg@mfa.lt	https://sg.mfa.lt/

Appendix. List of Diplomatic Missions

Iran	Embassy of the Republic of Lithuania in the Republic of Türkiye	Büyükesat Mah., Mahatma Gandhi Cad. No:38, Çankaya, Ankara, Türkiye	+90 312 447 07 66	amb.tr@urm.lt	https://tr.mfa.lt
Ireland	Embassy of the Republic of Lithuania in Ireland	47 Ailesbury Road, Ballsbridge, D04P224, Dublin, Ireland	+353 1 2035737	amb.ie@urm.lt	https://ie.mfa.lt
Israel	Embassy of the Republic of Lithuania in the State of Israel	Sason Hogi Tower, 12 Abba Hillel Silver St., Ramat Gan 5250606, Israel	+972 3 6958 685	amb.il@mfa.lt	https://il.mfa.lt
Italy	Embassy of the Republic of Lithuania in the Italian Republic	Via Vittoria Colonna 1, 00193 Rome, Italy	+39 06 855 90 52	amb.it@mfa.lt	https://it.mfa.lt
Japan	Embassy of the Republic of Lithuania in Japan	3-7-18 Moto-Azabu, Minato-ku, Tokyo 106-0046, Japan	+81 3 3408 5091	amb.jp@urm.lt	https://jp.mfa.lt
Kazakhstan	Embassy of the Republic of Lithuania in the Republic of Kazakhstan	Kosmonavtov str. 62A, 16th floor, 010000 Astana, Kazakhstan	+7 717 2 79 27 47	amb.kz@urm.lt	https://kz.mfa.lt/
Kazakhstan	Consulate General of the Republic of Lithuania in Almaty	Gornij Gigant, Iskenderovo 15, 050059 Almaty, Kazakhstan	+7 727 263 10 40	consulate.almaty@mfa.lt	https://consulate-almaty.mfa.lt/
Latvia	Embassy of the Republic of Lithuania in the Republic of Latvia	Rūpniecības iela 24, LV-1010, Riga, Latvia	+371 67 321 519	amb.lv@urm.lt	https://lv.mfa.lt
Moldova	Embassy of the Republic of Lithuania in the Republic of Moldova	Strada Ion Vasileenco 24/1, MD-2001, Chişinău, Moldova	+373 22543194	amb.md@urm.lt	https://md.mfa.lt
Montenegro	Embassy of the Republic of Lithuania in the Republic of Croatia	Ulica Ivana Lučića 2A, 9th floor, 10000 Zagreb, Croatia	+385 164 47785	amb.hr@urm.lt	https://hr.mfa.lt/
Morocco	Embassy of the Republic of Lithuania in the French Republic (accredited to Morocco)	22, bd de Courcelles, 75017 Paris, France	+33 1 88 75 60 60	amb.fr@urm.lt	https://fr.mfa.lt
Netherlands	Embassy of the Republic of Lithuania in the Kingdom of the Netherlands	Laan van Meerdervoort 20, 2517 AK The Hague, The Netherlands	+31 70 385 5418	amb.nl@mfa.lt	https://nl.mfa.lt

Appendix. List of Diplomatic Missions

North Macedonia	Section of the Embassy of Lithuania in Skopje (accredited in North Macedonia)	Macedonia St. 33/3, 1000 Skopje, North Macedonia	+389 2 323 09 09	office.skopje@mfa.lt	-
Norway	Embassy of the Republic of Lithuania in the Kingdom of Norway	Dronningens gate 3, 0152 Oslo, Norway	+47 21 56 98 56; +370 706 539 89 (when calling from Lithuania)	amb.no@urm.lt	https://no.mfa.lt
Palestine	Liaison Office of the Republic of Lithuania to Palestine	Trust Building, 5th floor, 48 Othman Ben Affan street, Al-Bireh, Ramallah, Palestine	+972 2 241 5290	office.ramallah@mfa.lt	-
Philippines	Embassy of the Republic of Lithuania in the Republic of Korea	11th Floor, Kyobo Building, Jong-ro 1, Jongno-gu, Seoul 03154, Republic of Korea	+82 2 2031 3500	amb.kr@urm.lt	https://kr.mfa.lt
Poland	Embassy of the Republic of Lithuania in the Republic of Poland	Al. Ujazdowskie 14, 00-478 Warszawa, Poland	+48 22 625 33 68	amb.pl@urm.lt	https://pl.mfa.lt
Poland	Consulate of the Republic of Lithuania in Sejny	ul. Wileńska 9, 16-500 Sejny, Poland	+48 87 5173790	kons.seinai@urm.lt	https://consulate-sejny.mfa.lt
Spain	Consulate of the Republic of Lithuania in Valencia	C/ Roger de Lauria 5, 3*, 46002 Valencia, Spain	+34 963816293	consulate.valencia@mfa.lt	https://consulate-valencia.mfa.lt
Sweden	Embassy of the Republic of Lithuania in the Kingdom of Sweden	Grevgatan 5, BV, 114 53 Stockholm, Sweden	+46 0 8 667 54 55	amb.se@urm.lt	https://se.mfa.lt
Switzerland	Embassy of the Republic of Lithuania in the Swiss Confederation	Weltpoststrasse 5, 3015 Bern, Switzerland	+41 79 550 0146	amb.ch@urm.lt	https://ch.mfa.lt/
Ukraine	Embassy of the Republic of Lithuania in Ukraine	21 Buslivska str., 01103 Kyiv, Ukraine	+380 44 254 0920; +380 67 924 04 27	amb.ua@urm.lt	https://ua.mfa.lt
United Kingdom	Embassy of the Republic of Lithuania in the United Kingdom	Lithuania House, 2 Bessborough Gardens, London SW1V 2JE, United Kingdom	+44 0 20 7592 2840	amb.uk@urm.lt	https://uk.mfa.lt
United States	Consulate General of the Republic of Lithuania in Chicago	455 N Cityfront Plaza Dr., Suite 800, Chicago, IL 60611, USA	+1 312 397 0382	kons.cikaga@urm.lt	https://chicago.mfa.lt
United States	Consulate General of the Republic of Lithuania in New York	420 Fifth Avenue, 3rd Floor, New York, NY 10018, USA	+1 212 444 7282	info.newyork@mfa.lt	https://ny.mfa.lt

Appendix. List of Diplomatic Missions

United States	Consulate General of the Republic of Lithuania in Los Angeles	11766 Wilshire Boulevard, Suite 560, Los Angeles, CA 90025, USA	+1 424 341 8701	consulate.losangeles@mfa.lt	https://la.mfa.lt/
United States	Embassy of the Republic of Lithuania in the United States of America	2622 16th Street NW, Washington, DC 20009, USA	+1 202 234 5860; +1 202 436 2471	amb.us@urm.lt	https://usa.mfa.lt



If you encounter signs of corruption, please report it to:

Special Investigation Service (STT) of the Republic of Lithuania: https://stt.lt/en/report-about-corruption/7380 tel. +370 526 63 333	The host country's anti-corruption authority (an institution analogous to the STT, if one exists)	The host country's law enforcement authority (e.g., the police) by phone or in person at a law enforcement office	A diplomatic mission or consular post of the Republic of Lithuania
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2025

Special Investigation Service
of the Republic of Lithuania