

Polimex Mostostal Capital Group Sustainability Report 2025

INTERIM REPORT FOR THE PERIOD FROM 01.01.2025, TO 31.12. 2025



This PDF publication is a separate section of the sustainability reporting prepared on the basis of data contained in the Polimex Mostostal Capital Group's 2025 Annual Report. This publication does not constitute a separate reporting document within the meaning of the law - it is intended for informational and supplementary purposes in relation to the official Report on the Activities of the PxM Capital Group. The material has been prepared in an informative format, with additional visual elements and a dedicated layout, with the aim of presenting key issues related to environmental, social, and corporate governance (ESG) aspects in a clear and accessible manner.

Warsaw, 24 April 2026

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Polimex Mostostal Capital Group sustainability reporting

ESRS2 – GENERAL DISCLOSURES

BP-1 General basis for preparation of the sustainability statement

Reporting standard

The report has been prepared in accordance with the Accounting Act of 29 September 1994 (Journal of Laws 1994 No. 121, item 591, as amended) for the Polimex Mostostal Capital Group. This report has been prepared on the basis of the European Sustainability Reporting Standards (ESRS) introduced by Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.

The report also makes disclosures in accordance with the provisions of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, together with further delegated acts extending the scope of the EU Taxonomy and sustainability reporting.

Consolidation

The information, data and ratios and statements contained in the report relate to the Polimex Mostostal Group, unless otherwise indicated. The terms “Polimex Mostostal Capital Group”, “Capital Group” and “PxM CG” mean the Parent Company Polimex Mostostal S.A. together with subsidiaries subject to consolidation.

The sustainability report is prepared on an annual basis and includes sustainability information relating to the Polimex Mostostal Group for the period from 1 January 2025 to 31 December 2025.

As at 31 December 2025, the Polimex Mostostal Group comprised 14 companies (parent company Polimex Mostostal S.A. and 13 subsidiaries of Polimex Mostostal S.A.).

Table 1. Scope of consolidation in the financial statements and sustainability statement.

Item	Entity	Registered office	Scope of business activity	% of shares		Scope in the Capital Group Financial Statements 2025	Scope in the Capital Group Sustainability Report 2025
				As at 31 December 2025	31/12/2024		
1	Polimex Energetyka sp. z o.o.	Warsaw	Construction works	100	100	YES	YES
2	Naftoremont-Naftobudowa sp. z o.o.	Płock	Construction works	100	100	YES	YES
3	Polimex Opole sp. z o.o. sp. k.	Warsaw	Construction works	100	100	YES	YES
4	Mostostal Siedlce sp. z o.o.	Siedlce	Manufacturing of metal products	100	100	YES	YES
5	Stalfa sp. z o.o.	Sokołów Podlaski	Manufacturing of metal products	100	100	YES	YES
6	Polimex-Mostostal ZUT sp. z o.o.	Siedlce	Technical services	100	100	YES	YES
7	Czerwonogradzki Zakład Konstrukcji Stalowych sp. d.o.	Chervonograd – Ukraine	Production of metal structures	100	100	YES	NO*
8	Polimex Budownictwo 1 sp. z o.o.	Siedlce	Industrial construction	100	100	YES	YES
9	Polimex Budownictwo sp. z o.o.	Siedlce	Industrial construction	100	100	YES	YES



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Item	Entity	Registered office	Scope of business activity	% of shares	Scope in the Capital Group Financial Statements 2025	Scope in the Capital Group Sustainability Report 2025	Item
10	Polimex Operator sp. z o.o.	Warsaw	Rental and leasing services of construction machinery and equipment	100	100	YES	YES
11	Polimex Infrastruktura sp. z o.o.	Warsaw	Construction works on roads and highways	100	100	YES	YES
12	Instal Lublin S.A.	Lublin	Specialised construction services	100	100	YES	YES
13	Energomontaż-Północ-Belchatów S.A.	Rogowiec	Specialised construction and assembly services	99.65	77.25	YES	YES

** Due to the ongoing hostilities in Ukraine and difficulties in obtaining data, this sustainability report includes all entities consolidated in the financial statements, except for Czerwonogradzki Zakład Konstrukcji Stalowych spółka d. o. It should be noted that the share of this Company's turnover is less than 3% of the Capital Group's turnover and, therefore, this exclusion does not affect the picture of the PxM CG management of sustainability matters.*

However, where financial data are presented in the sustainability statement, in order to ensure consistency and comparability, they are recognised in accordance with the scope of consolidation adopted for the Financial Statements of the Capital Group.

Polimex Mostostal Group has not exercised the option to omit specific information concerning intellectual property, know-how or the results of innovations and expected events or matters under negotiation in accordance with Article 19a(3) and Article 29a(3) of Directive 2013/34/EU.

Information on the value chain

The PxM CG value chain provided a model to support the materiality testing process. The main objective of the value chain analysis was to understand the impact of the Capital Group's activities on employees, colleagues, value chain participants, customers and the environment, and to manage this impact effectively.

The upstream activities of the PxM CG include activities related to the acquisition of resources, technology, materials, sourcing of raw materials, machinery, which enable further production and realisation of final services and products.

The core business of the Capital Group comprises broadly understood construction and installation services provided under the general contracting system in Poland and abroad, installation and maintenance of industrial equipment and installations, and production. PxM CG focuses its activities in areas such as construction, manufacturing, design, assembly, installation, renovation and servicing. The Capital Group carries out specialist investments in Poland and abroad for the energy, petrochemical, gas and environmental protection industries. It is a manufacturer and exporter of steel structures, gratings and is involved in galvanising and painting steel structures. The Company, directly and also through its subsidiaries, plays an active role in Poland's energy transition process.

The downstream activities of the PxM CG value chain include activities related to the implementation of construction projects, processes of transforming steel and aluminium products into finished construction elements, their distribution, as well as further support and maintenance after completion of construction.



BP-2 Disclosures in relation to specific circumstances

Coverage and comparability of data

This report is the second report of the Polimex Mostostal Capital Group prepared based on the ESRS standards. The report includes comparative periods in accordance with the ESRS requirements.

The PxM CG has not deviated from the medium as well as the long-term time horizons set out in ESRS 1.

The PxM CG does not disclose information in the report on the basis of, or incorporate information by reference to, other legislation or generally applicable interpretations and standards on sustainability reporting.

As at the balance sheet date, the Capital Group exceeds the number of 750 employees and therefore cannot exercise the right to omit information covered by ESRS E4, ESRS S1, ESRS S2, ESRS S3 and ESRS S4. These topics were therefore included in the double materiality assessment, as a result of which matters under ESRS E4, ESRS S1 and ESRS S2 were deemed material and are reported in this report.

During an in-depth analysis of the emissions calculation methodology and verification of the selection of emission factors for purchased road transport services, the factor used for this cost category was corrected to better reflect the nature of the services purchased, including special transport. As a result, the PxM CG recalculated the data for 2024 using the corrected factor and adopted the same factor as applicable for the calculation of data for 2025. This Change was introduced to increase the adequacy, consistency and comparability of the disclosed data, with the comparative data for 2024 adjusted accordingly to ensure their consistency with the approach applied in the current reporting period. Due to limited access to data after the handover of products/installations to the Ordering Parties and the lack of reliable estimated data on which to rely, as well as potentially very large year-on-year deviations, the presentation of data in categories 9–12 of scope 3 CO₂ emissions was discontinued.

The presented data concerning resource use and the circular economy, including water, for 2025 show significant deviations from the comparative data for 2024. The limited year-on-year comparability of data results primarily from a Change in the PxM CG's process of collecting, validating and consolidating reporting data in the area of resources introduced into the organisation and resources discharged from the PxM CG.

In 2024, due to the fact that the PxM CG did not have a unified standard and methodology for calculating data for the purposes of sustainability reporting, the data collection process was transitional in nature. At that time, limitations were also identified in relation to the effectiveness of the reporting process and the level of ESG competences, which contributed to incomplete data quality.

In 2025, measures were implemented to improve the quality, completeness and consistency of reporting data, in particular by introducing quarterly data collection, appointing dedicated ESG coordinators in the companies of the Capital Group, refining reporting forms and conducting training activities for persons participating in the reporting process. As a result, the completeness of data coverage increased, the quality of classification of reported items improved and the risk of omissions and inconsistencies was reduced. However, inaccuracies still occur in connection with the conversion of various operational units of measurement, such as items, sets, litres and m³, into a uniform mass unit, i.e. kg.

In the opinion of the Capital Group, a significant part of the differences between the data for 2025 and the comparative data for 2024 results from the improvement of the methodology and organisation of the reporting process, and not from operational changes in the scale of activity. For this reason, the data concerning the circular economy for 2024 should be interpreted considering limited comparability.

The significantly higher values of resources introduced into the organisation in the PxM CG result primarily from the implementation of new infrastructure projects involving significant use of earth masses, aggregates, backfills and concrete.

Taxonomy disclosures have been prepared in accordance with the current version of the taxonomy tables, based on Annex II to Commission Delegated Regulation (EU) 2026/73 of 4 July 2025.

Sources of estimates and uncertainty of results

The measures in the report do not include value chain data estimated using indirect sources. None of the quantitative and monetary metrics are subject to a high level of measurement uncertainty. Details of the estimates are provided in disclosures E1-6 and E3-4. The report adopts a materiality threshold of 3% of total revenue of the Capital Group.



External verification

This Polimex Mostostal Group Sustainability Statement has been externally verified. The verification was carried out by the audit firm Grant Thornton Polska P.S.A. in accordance with the National Standard on Assurance Engagements KSUA 3002PL Assurance engagements other than audits or reviews of historical financial information.

GOV-1 The role of the administrative, supervisory and management bodies

THE MANAGEMENT BOARD OF POLIMEX MOSTOSTAL S.A.

The Management Board of Polimex Mostostal S.A., as the highest management body in the Company, sets the direction for the entire Capital Group and plays the main role in the process of determining its objectives, values and strategy, with particular attention to the organisation's positive impact on the economy, the environment and society. In order to ensure the highest effectiveness of actions, the Management Board of Polimex Mostostal, in cooperation with and with the active participation of the management staff of the Company and its subsidiaries, creates and updates the objectives of the Capital Group, defines the values, mission and vision of the Company, and the strategy, policies and development plans for the Company and its subsidiaries.

In accordance with the Articles of Association of the Company, the Management Board of Polimex Mostostal S.A. consists of one or more members. The number of members of the Management Board of Polimex Mostostal S.A. is determined by the Supervisory Board. The tasks of the Management Board are described in the Regulations of the Management Board of Polimex Mostostal S.A. approved by the Supervisory Board. The Supervisory Board may change the number of members of the Management Board during its term of office, but only with simultaneous changes in the composition of the Management Board. Members of the Management Board shall be appointed and dismissed by the Supervisory Board. The Management Board is appointed for a joint three-year term of office.

The Management Board plays a key role in sustainability reporting. Its responsibilities include strategic management and supervision of sustainability activities and monitoring of environmental, social and corporate governance reporting.

The Management Board is responsible for communicating material information on sustainability activities to the Stakeholders of the Capital Group, including investors, financial institutions and the public, in accordance with applicable reporting requirements. The role of the Management Board includes supervision over the implementation of sustainability objectives and ongoing monitoring of the effectiveness of the measures implemented, based on the framework of the European Sustainability Reporting Standards (ESRS).

Composition of the Management Board

As of 31 December 2025, the Management Board of Polimex Mostostal S.A. consisted of the following persons:

- Jakub Stypuła – President of the Management Board
- Marzena Hebda-Sztandkie – Vice President of the Management Board
- Mirosław Sołtysiak – Vice-President of the Management Board

Number of women: 1 (representing 33.3 %)

Number of men: 2 (representing 66.7 %)

The Management Board of Polimex Mostostal S.A. does not include an employee representative.

In 2025, there have been changes in the composition of the Management Board:

Appointments:

- Jakub Stypuła – serving as Vice-President for Operations and acting President of the Company from 8 July 2024, was appointed by the Supervisory Board as President of the Management Board as of 11 March 2025,
- Mirosław Sołtysiak – appointed to the Management Board by the Supervisory Board as of 1 April 2025, with the function of Vice-President of the Management Board for Operations entrusted to him.



Experience of Management Board members:

Jakub Stypuła is a graduate of the Faculty of Law and Administration at the University of Warsaw, a certified Project Manager, a trainer, a participant in post-graduate and graduate studies in project management (SGH) and international business management (VISTULA). For years, he has specialised in investment management in the energy and construction sectors. He is an expert on organisational, cost, formal and environmental issues and global project management methodologies. Jakub Stypuła implemented project and portfolio management systems in the largest Polish energy companies (GAZ-SYSTEM, PSE), and for 6 years held the position of Chief Investment Officer at GAZ-SYSTEM, where he was successfully responsible for a 4.5 billion euro programme for the construction of 1500 km of gas transmission network and the creation of Poland's first investor supply system for pipes and fittings. As Project Director at PORR S.A., Energy Division, he built a high-pressure gas pipeline DN 1000 8.4MPa Tworóg – Tworzeń. Participated as a Project Manager in the project to modernise the Kortowo heating plant in Olsztyn. He led teams of consultants during the implementation of project implementation systems or new models of investment implementation. He has negotiated contracts and represented contractors before the NAC, and has been involved in projects concerning proceedings before the Stockholm Arbitration Court. Third-degree Mining Director, awarded the honorary badge “Meritorious for the Energy Sector”.

As President of the Management Board of Polimex Mostostal S.A., he manages the entire Company and directly supervises the following organisational units:

- Audit and Control Office
- Business Development Office
- Innovation Office
- Communication and PR Office
- Security Office
- Human Resources Office
- Project Management Office
- Office of Legal Affairs and Corporate Governance
- Regulatory Compliance Office

Marzena Hebda-Sztandkie is a doctor of economics and a graduate of the Warsaw School of Economics. She obtained her MBA from the Warsaw University of Technology as part of a programme in collaboration with London Business School, HEC School of Management and NHH Norwegian School of Economics. She holds the highest level of project management certification – Certified Project Director from the International Project Management Association (IPMA). During a career spanning more than 20 years, she has gained interdisciplinary experience in finance and investment project management in Poland's largest infrastructure companies. At Porty Lotnicze, between 2001 and 2014, she was responsible for, among other things, obtaining financing in cooperation with Polish and international financial institutions, financial planning, financial liquidity, financial risk management, insurance, as well as monitoring and settling investment projects related to airport expansion. Between 2015 and 2019, at PKP Polskie Linie Kolejowe S.A., she was responsible for monitoring and managing the risk of infrastructure projects implemented by the Company with a value of approximately PLN 70 billion, including, among other things, the position of Chairwoman of the Investment Committee of PKP PLK S.A. In the period 2019–2024, at Centralny Port Komunikacyjny sp. z o.o., she participated in the development of the Airport Sub-programme by preparing designs and planning documents related to the planning and design Phase of the future airport.

She has been involved in a number of projects for the development of feasibility studies, financial models, business analyses and evaluation studies for infrastructure projects. She has carried out research and teaching activities in cooperation with the Warsaw School of Economics.

The Vice-President of the Management Board of Polimex Mostostal S.A. supervises the following organisational units:

- Administration, Logistics and Real Estate Office
- IT Office
- Controlling Office
- Accounting Office
- Procurement Office



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- Financial Management Office
- Sustainable Development Office

Mirosław Sołtysiak is a graduate of the Silesian University of Technology, where he obtained a master's degree in thermal power engineering. He has extensive experience in project and business development, M&A activities, formulating and implementing business plans, improving operating activities, negotiating and performing contracts, and creating and managing teams.

He gained professional experience in renowned international corporations operating, among others, in the energy industry in Poland, Germany, the United Kingdom and the USA.

He began working in the energy sector in 1992 at Remak-Rozruch, then worked in 1995–1998 at National Power in the United Kingdom, and in 1999–2000 in Warsaw. In 2000–2003, he was employed as Director of the Energy Group at BRE Corporate Finance S.A. In 2003–2007, he worked as Managing Director and President of the Management Board of Elektrociepłownia ELCHO in Chorzów. Later, in 2007–2009, he worked at PricewaterhouseCoopers Polska sp. z o.o. as a director responsible for strategic advisory services for Polish energy groups.

In 2009–2010, he was associated with PGE Polska Grupa Energetyczna S.A., serving as Director of the Mining and Energy Department. In addition, he served as a Member of the Supervisory Board in the combined heat and power plants in Rzeszów and Bydgoszcz belonging to the Group. In 2013–2018, he was Director of the Operations Department at PGE S.A. and a Member of the Supervisory Board of PGE GiEK S.A.

In 2010–2012, he worked as Business Development Director Europe at Suncoke International Development sp. z o.o., and from 2018 he cooperated with a number of entities operating on the RES market, including GEO Renewables, GEO Solar and Esoleo sp. z o.o., where, among other things, he managed the construction project of a 70 MWp photovoltaic power plant commissioned in 2021 and a number of other photovoltaic power plant preparation and construction projects.

From June 2024, he held the position of President of the Management Board of PGE Energia Odnawialna S.A. – a subsidiary of PGE Polska Grupa Energetyczna S.A., the national leader in renewable energy specialising in the generation of electricity from Renewable Energy Sources with a total capacity exceeding 1,000 MW and the provision of Ancillary System Services using, among others, four pumped-storage power plants with a total installed capacity exceeding 1,500 MW.

The Vice-President of the Management Board of Polimex Mostostal S.A. supervises the following organisational units:

- Health and Safety and Environmental Protection Office
- Warranty Service Office
- Operations Office
- Technical Office
- Bidding Support Office
- Design Support Office
- Strategic Sector Offices

Managing the area of sustainable development

Supervision over ESG matters, in accordance with Resolution of the Supervisory Board of Polimex Mostostal S.A. No. 155/XIV of 15 January 2025, is exercised by the Vice-President of the Management Board of Polimex Mostostal S.A. Ms Marzena Hebda-Sztandkie. By separate resolutions, ESG-related matters were entrusted to members of the management boards in the subsidiaries.

In order to perform tasks in the ESG area, the Sustainable Development Office operates within the organisational structure of PxM and cooperates with other organisational units and companies from the PxM CG. ESG Coordinators have been appointed in the subsidiaries. ESG management is implemented through defined competences of management and supervisory bodies, risk management systems, including identification, assessment and monitoring of ESG risks, and policies, procedures and instructions covering both employees and



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partners in the supply chain. Regular dialogue with key Stakeholders enables the needs and expectations of the environment to be truly identified and taken into account.

In addition, the Polimex Mostostal Group uses an external consulting company specialising in the ESG area to support the Group in meeting its ESG obligations, including data collection and report preparation.

SUPERVISORY BOARD

Pursuant to the provisions of the Articles of Association of Polimex Mostostal S.A., the Supervisory Board consists of 5 to 7 members elected for a joint term of three years. The number of members of the Supervisory Board for successive terms of office is determined by the General Meeting when electing its members. The General Meeting may change the number of members of the Supervisory Board during the term of office, but only with corresponding changes in the composition of the Supervisory Board. At least three members of the Supervisory Board should meet the criteria of independence from the Company and entities with significant links to the Company. Any shareholder may propose in writing to the Company's Management Board candidates for an Independent Member of the Supervisory Board no later than seven business days before the date of the General Meeting to elect such member.

The Supervisory Board, as the highest supervisory body, may express opinions on all matters of the Company and make proposals and initiatives to the Management Board. The Management Board is obliged to notify the Supervisory Board of its position on the Supervisory Board's opinion, proposal or initiative within 14 days of receipt. The Supervisory Board is also authorised, in exercising its supervisory rights and activities, to request and receive any documents of the Company, together with copies and extracts thereof. In addition, there is a Development Strategy Committee within the Supervisory Board, which is important in terms of scrutinising strategies, policies and objectives relating to economic, environmental and social impacts.

Composition of the Supervisory Board

The Supervisory Board of Polimex Mostostal S.A. as at 31.12.2025 consisted of the following:

- Wojciech Bartelski – Chairman of the Supervisory Board
- Konrad Kąkol – Vice Chairman of the Supervisory Board,
- Maciej Ługowski – Secretary of the Supervisory Board,
- Agnieszka Doroszkiewicz,
- Maciej Drabio,
- Grzegorz Kinelski.

Number of women: 1 (17 %)

Number of men: 5 (83 %)

Experience of Supervisory Board Members:

Detailed experience and full CVs of the Supervisory Board members are available at: <https://www.polimex-mostostal.pl/wladze-polimex-mostostal-sa>. Only the most important information about each person is provided below.

Wojciech Bartelski is a graduate of the Faculty of Economic Sciences at the University of Warsaw, majoring in international economics. He completed postgraduate studies in public administration management at the Kozminski University, as well as postgraduate studies in management at ICAN Harvard Business Review. Wojciech Bartelski has extensive professional experience gained in the field of urban infrastructure management and public transport development.

Independent member

Konrad Kąkol – attorney-at-law, is a graduate of the Faculty of Law and Administration of the Jagiellonian University in Krakow, the Management Program in Corporate Finance (Kozminski University in Warsaw) and numerous postgraduate studies. Expert in corporate law, M&A transactions and international law. A practising foreign lawyer in the UK, advising on corporate and commercial law to major Polish entities doing business in the England and Wales market.

Independent member



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Maciej Ługowski – legal counsel, is a graduate of the Faculty of Law and Administration at the University of Warsaw. Maciej Ługowski specialises in capital market law, corporate services for commercial law companies, in particular public companies, as well as the property development market. Maciej Ługowski has advised on numerous capital market transactions, in particular public and private offerings of both shares and bonds, transactions involving the listing of shares on multiple markets, delisting, share buybacks, buyout of minority shareholders, as well as M&A transactions.

Independent member

Agnieszka Doroszkiewicz is a graduate of the Warsaw School of Economics, majoring in economics and social sciences, a manager with over 20 years of experience in corporate governance and the privatisation, merger, sale, purchase and liquidation of commercial law companies.

Independent member

Maciej Drabio is an MBA graduate of the Warsaw Business School, with a Master's degree in Management and Marketing from the Podlasie Academy in Siedlce. Maciej Drabio is an expert in ISO 23001 Business Continuity Management Systems and ISO 27001 Information Security Management Systems. Maciej Drabio is a certified CGAP public sector auditor. Member of the Institute of Internal Auditors IIA Poland and the Association of Experts in Anti-Fraud, Economic Abuse and Corruption ACFE Poland.

Independent member

Grzegorz Kinelski is a graduate of electrical engineering studies at the Faculty of Electrical Engineering of the Silesian University of Technology in Gliwice and of master's studies at the Faculty of Organisation and Management of this university, majoring in management and marketing. He obtained his doctorate in economics from the University of Szczecin. A practitioner combining many years of professional experience with academic research. Academic teacher, assistant professor in the Department of Management at the WSB Academy in Dąbrowa Górnicza. Author of more than 50 scientific publications in the fields of economics and management and quality sciences.

Independent member

Number of independent Supervisory Board members: 6 (representing 100 %)

Supervisory Board Committees

The Supervisory Board has the following committees: Audit Committee, Remuneration Committee and Development Strategy Committee.

Audit Committee

The primary task of the Audit Committee of Polimex Mostostal is to advise the Supervisory Board on matters related to the proper implementation and control of financial reporting processes in the Company, the effectiveness of internal control and risk management systems, and the selection, supervision and cooperation with certified auditors. In particular, it is the Audit Committee's responsibility to monitor the financial reporting process on an ongoing basis and to make recommendations to the Company's bodies to ensure the integrity of the process within the Company. The Audit Committee controls and monitors the auditor's independence.

The Audit Committee is also responsible for monitoring the effectiveness and periodically reviewing the Company's internal control and risk management systems and the Company's internal audit. The Regulations of the Audit Committee are approved by the Supervisory Board.

Remuneration Committee

The primary task of the Remuneration Committee is to support the Supervisory Board in the performance of its control and supervisory duties, and in particular to provide the Supervisory Board with opinions on drafts of the content of contracts related to the performance of the function of a member of the Management Board and to provide an opinion on proposals for the remuneration and bonus system for members of the Company's Management Board.



Development Strategy Committee

The primary task of the Committee is to support the Supervisory Board in matters of overseeing the proper implementation of the Company's and the Company Group's strategy and the Company's and the Company Group's annual and multi-year business plans. The Development Strategy Committee plays a key role in controlling strategies, policies and objectives related to the impact on the economy, the environment and society.

The Supervisory Board set objectives for the Vice-President of the Management Board for Finance in the area of sustainability reporting for 2025 and 2026:

- Ensuring the timely course of the audit of the ESG report 2025, 2026
- Development of a package of initiatives for the decarbonisation strategy in the PxM CG 2026
- Development of a "green business travel" policy as an element of the business travel procedure. 2026

GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Supervision over ESG matters, in accordance with Management Board Resolution No. 329/24 of 10 December 2024 and Supervisory Board Resolution No. 155/XIV of 15 January 2025, is exercised by the Vice-President of the Management Board of Polimex Mostostal S.A. Ms Marzena Hebda-Sztandkie, which covers the following matters:

- coordination of the Company's sustainability activities,
- preparation and supervision of the implementation of the ESG strategy,
- cooperation with Stakeholders in the ESG area,
- ESG risk management,
- preparation of ESG reports and statements in accordance with legal regulations and industry standards,
- initiating and monitoring activities to achieve environmental, social and corporate governance objectives.

In 2025, the Capital Group continued the implementation of the PxM CG ESG Strategy, focusing on building a coherent management system and integrating sustainability matters with key operational processes. In the area of corporate governance, the ESG management structure was formalised by assigning responsibilities within the scopes of duties of employees and bodies of the companies and by introducing changes to organisational regulations. In accordance with Management Board Resolution No. 150/25 of 21 June 2025 on the adoption of the New Organisational Regulations of Polimex Mostostal S.A., the Sustainable Development Office was established, responsible for sustainability reporting and coordination of the collection and verification of ESG data in the PxM CG. The tasks of all organisational units and organisational cells separated within the PxM structure include, among others: implementing and monitoring strategies consistent with the principles of sustainable development, corporate governance and social responsibility, as well as collecting, analysing and reporting ESG data in the areas of responsibility of a given organisational unit. By separate resolutions, ESG-related matters were entrusted to a member of the Management Board in the subsidiaries. ESG Coordinators have been appointed in the subsidiaries. At the same time, a number of compliance policies and procedures were implemented and updated, including codes of ethics for employees and contractors, anti-corruption procedures and regulations concerning risk management and control. The integration of ESG risks with the company-wide risk management system was also commenced.

In addition, the Polimex Mostostal Group uses an external consulting company to support the group in meeting its ESG obligations, including data collection, preparation of reports.

Mr Maciej Drabio – member of the Supervisory Board was appointed by the Supervisory Board to act as a coordinator authorised to supervise the ESG implementation process in the Polimex Mostostal Capital Group.

In accordance with the "Monitoring of the OHS status" procedure, the Director of the OHS and Environmental Protection Office in the PxM CG is responsible for providing information on the OHS status in the Group to the Management Board of Polimex Mostostal, as well as to the management boards of the subsidiaries.



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In terms of environmental protection, according to the procedure “Environmental Monitoring”, the Health, Safety and Environmental Office and designated staff in the organisational units are responsible for overseeing the aforementioned procedure, drawing up an annual monitoring schedule, collecting monitoring data for reporting to management and environmental authorities.

In 2025, the Sustainable Development Policy in the ESG area of the Polimex Mostostal Capital Group (ESG Policy) was approved, defining the basic principles of responsible business conduct integrated with the long-term business strategy of the PxM CG. This document expresses the commitment to systematically implement environmental, social and corporate governance requirements, as well as to set and achieve objectives in these areas in accordance with applicable national and EU regulations. The ESG Policy is the official, overarching declaration of PxM and the PxM CG Companies regarding the basic principles, values and commitments of the PxM CG in the environmental (E), social (S) and corporate governance (G) areas, in accordance with applicable legal provisions, standards and European Sustainability Reporting Standards. The ESG Policy is a document complementary to the Polimex Mostostal Capital Group Strategy and the PxM Capital Group ESG Strategy. It sets out the general framework and overarching principles for commitments and actions relating to sustainable development and sustainable development reporting at the PxM Capital Group, ensuring that the activities of the Companies within the PxM Capital Group, together with the PxM organisational units, as well as employees and associates, comply with the highest ethical standards and stakeholder expectations.

In the environmental area, an extensive series of decarbonisation workshops was conducted in all companies of the Capital Group, identifying key emission reduction directions. On this basis, decarbonisation plans were developed and consolidated, and assumptions for the Transition Plan for climate change mitigation were prepared. An important element was also the organisation and improvement of the quality of environmental data, in particular in the area of greenhouse gas emissions, including Scope 3, through the implementation of data aggregation, verification and validation processes in accordance with recognised standards. The system for collecting data on waste, water consumption and other environmental aspects was also developed, and analyses of the energy efficiency of buildings were carried out.

As part of social and organisational activities, ESG training programmes were implemented, including dedicated workshops for management staff, and employee training needs were identified. The Vice-President of the Management Board for Finance regularly participated in monthly team meetings devoted to the status of ESG activities, during which current matters are discussed, and necessary operational decisions are made. Systematic meetings are also held with ESG coordinators in the companies of the Capital Group, aimed at the ongoing exchange of information and ensuring the consistency of actions taken. In the reporting period, internal ESG educational training sessions were conducted for employees, and employees were also provided with permanent access to an updated knowledge base and webinars devoted to sustainability issues. ESG topics are also addressed in internal communications and as part of cyclical and thematic internal meetings, which serves to strengthen ESG competences and awareness at all levels of the organisation.

Communication with Stakeholders was also developed through the preparation of a dialogue strategy and employee opinion surveys. In addition, ESG aspects were incorporated into cooperation with suppliers and procurement processes, including through the communication of requirements concerning the carbon footprint and the preparation of changes to procedures. Actions were also taken in the area of the circular economy, including the development of policy assumptions and the implementation of workshops and training sessions for the companies of the Capital Group.

GOV-3 Integration of sustainability-related performance in incentive schemes

The remuneration framework for members of the Supervisory Board and members of the Management Board is set out in Resolution No. 31 of 18 July 2024 of the Ordinary General Meeting of Shareholders, “Remuneration policy for the Management Board and members of the Supervisory Board of Polimex Mostostal S.A.”

The remuneration of the members of the Management Board is determined individually during the Supervisory Board meeting when adopting resolutions on the appointment of a member of the Company's Management Board. Remuneration for senior management is individually determined by the Management Board of Polimex Mostostal. In addition, as part of their additional remuneration, employees covering senior management positions are covered by the management bonus scheme.

The bonus system covering Members of the Management Board includes variable remuneration components dependent on the achievement of business objectives, i.e. specific financial results of the Capital Group and/or the financial results of individual PxM CG companies.



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Bonus systems for Members of the Management Boards of subsidiaries, as well as Directors of organisational units operating within the structure of the Capital Group, are based on the principle of granting a discretionary, incentive cash benefit in the form of a discretionary bonus. Individual companies, in deciding whether to grant the right to a bonus and (if granted) the amount of the bonus, take particular account of:

- the quality of fulfilment of duties,
- showing initiative at work,
- improving its efficiency and quality.

The remuneration for the members of the Supervisory Board of Polimex Mostostal is determined by a Resolution of the General Meeting of Shareholders of the Company. In 2025, all members of the Management Board had objectives related to employee safety, i.e. the accident incidence rate and accident frequency rate, and additionally the Vice-President for Finance had an objective concerning ensuring the timely course of the audit of the ESG report. The weight of these objectives in the overall weight of all objectives ranges from 10% to 25% of the total weight of all objectives.

Detailed information on remuneration for supervisory and management bodies is included in the annual “Reports on the remuneration of Members of the Management Board and Supervisory Board of Polimex Mostostal S.A.” published on the website of the Capital Group.

GOV-4 statement on due diligence

The Polimex Mostostal Capital Group conducts its activities on the basis of a comprehensive system of internal regulations and management systems, including policies, procedures, instructions and codes of conduct relating to key business processes. Each of these documents is adapted to the specific nature of the given area of activity and confirms the application of due diligence principles in identifying and managing risks, ensuring compliance with applicable laws and implementing adopted ethical, social and environmental standards. As part of activities aimed at harmonising and organising the approach to sustainable development and ESG, the Capital Group adopted the overarching Sustainable Development Policy in the ESG area, which constitutes a reference point for all internal regulations.

Table 2. Elements of the due diligence process.

Core elements of due diligence	Paragraphs in the sustainability statement
Embedding due diligence in governance, strategy and business model	S1-1, S2-1
Engaging with affected stakeholders in all key steps of the due diligence	S1-2, S2-2
Identifying and assessing adverse impacts	IRO-1, SBM-3
Taking actions to address those adverse impacts	S1-3, S2-3
Tracking the effectiveness of these efforts and communicating	S1-17, S2-4

GOV-5 Risk management and internal controls over sustainability reporting

In 2025, an initiative was implemented involving the integration of environmental, social and corporate governance (ESG) risk management with the company-wide risk management system.

Basic process assumptions for ESG risk management

- The ESG risk assessment process will be carried out semi-annually as part of:
 - semi-annual risk assessment in processes – starting from January 2026,
 - risk assessment in companies – also semi-annually, shifted by one quarter in relation to companies in order to collect the results of company assessments for the assessment of these risks at the Capita Group level,
 - risk assessment in selected long-term projects – also semi-annually, corresponding to the frequency of this assessment in companies shifted by one quarter,



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- The methodology for assessing ESG risks is identical at all assessment levels, with a slight limitation of the assessment scope at the project level.
- The owners of ESG risks at the following levels are:
 - I, i.e. projects – concerning selected long-term projects, the Directors of those projects, who have previously been Risk Owners in projects,
 - II, i.e. companies – Members of the Management Board in the companies, who have previously been responsible for risk assessment in the companies,
 - III, i.e. processes – Directors of PxM Offices, who are also Risk Owners in the processes managed by them.
- ESG risk coordinators are persons involved in a given ESG area, indicated by the Risk Owners.
- The ESG risk assessment process also provides for the role of an Expert, which, for individual risk factors, will be assigned to substantive process experts in a given ESG area and indicated by name on the risk card in the e-Risk system. This will enable direct contact/consultation between the Risk Owner or Coordinator and the Expert as part of the periodic risk assessment.
- The results of ESG risk assessments will form part of cyclical reporting to the management boards of:
 - Companies – each time after completion of this assessment in the company and in long-term projects carried out by the company,
 - PxM – each time after completion of this assessment in the companies and in long-term projects carried out by the company,
- The collected results of ESG risk assessments should also be subject to an annual review of these risks as part of cyclical ESG reviews.
- The ESG risk management process will be covered by the amended Risk Management Procedure in the PxM CG.

Polimex Mostostal Group is exposed to external and internal risks of a diverse nature. In order to identify, assess and effectively manage various types of risk, a risk management system has been implemented in the Capital Group. Persons managing individual areas, functions and business projects are responsible for risk management, including risk identification, assessment and monitoring, the effectiveness of control mechanisms and the planning of remedial and mitigating actions. Risks reported cyclically and at multiple levels are considered in the context of their impact on the achievement of the business objectives of the Capital Group.

The risk management process at Polimex Mostostal Group is governed by a Risk Management Policy and Procedure fully implemented into the e-Risk IT system, which is designed to support all participants in the process. The risk management system is an ongoing process directed towards the conscious management of risks. It supports day-to-day decision-making processes and the effectiveness of the implementation of strategic and operational objectives by providing information on identified risks and the assessment of their materiality.

PxM CG 's risk management system is based on:

- organisational structure, which includes the division of competences and tasks carried out by the companies' statutory bodies, units and organisational units and business projects,
- defined risk management process, including methods for identifying and assessing risks, mitigating actions, monitoring, controlling and reporting risks.

The risk management system is planned on three organisational levels:

- Level I includes projects implemented by Group companies,
- Level II includes Group companies,
- Level III covers the Group's processes.



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Table 3. PxM CG 's risk management process.

Item	Stage	Objectives of the phase
1.	Identification of risks	The objective of this phase is to ensure full information on current external risks affecting the activities of the Capital Group and risks occurring in processes carried out in companies, organisational units and projects (contracts) of the Capital Group. It involves the identification of actual and potential sources of risk, then analysed for materiality.
2.	Risk measurement and assessment	The objective of the phase is to reliably and objectively determine the degree of probability and impact of identified risks on the activities of the Capital Group.
3.	Mitigating actions	The aim of these activities is to make the management of individual risks more effective, covering risk avoidance, risk transfer, risk mitigation, risk acceptance, as well as the identification and implementation of corrective action plans.
4.	Monitoring and reporting	The purpose of this stage is to continuously analyse the level of materiality of the identified risks (including an ongoing review of the deviation of the achievement of objectives from the established benchmarks, i.e. limits, thresholds, plans, values from the previous period) leading to the identification of factors negatively influencing the maintenance of the accepted level of risk and, consequently, to the taking of measures to ensure control of the risks taken and the communication of risks according to established principles.

Table 4. Responsibility for the Risk Management System in the PxM CG.

Item	Entity:	Responsibility
1.	Supervisory Boards	They exercise continuous supervision over the risk management process and assess the adequacy and effectiveness of this process within the framework of the tasks set out in the statutes of the respective company and the rules of procedure of the Supervisory Board and through the Audit Committee (if appointed), with the Supervisory Board of the Company being responsible for the supervision of the risk management process in the entire Polimex Mostostal Capital Group, while the Supervisory Boards of the individual PxM CG companies are responsible for the supervision of the risk management process in the companies they supervise.
2.	Management Boards	They organise and ensure the operation of the risk management system by adopting rules for risk identification and assessment, with the Management Board of Polimex Mostostal being responsible for supervising the risk management process throughout the entire PxM CG, while the Management Boards of individual companies forming part of the Capital Group are responsible for the risk management process in the companies supervised by them.
3.	Project Management Office	Since September 2025, the Office has coordinated the Risk Management process and supervised the Integrated Quality Management System in the Capital Group.
4.	Risk owners	Those responsible for the effective management of risks (including the identification and assessment of risks and the prevention of the consequences of their materialisation) in their area of responsibility. They can appoint risk coordinators and entrust them to coordinate individual steps or the entire risk management process in their area of responsibility.

In accordance with the risk management principles adopted in the Polimex Mostostal Capital Group, risk reviews carried out in 2025 by the Management Boards took place, depending on the organisational level, at least once a quarter.

The person occupying the position of Risk Manager reported the Capital Group's risk assessment, to the Management Board of Polimex Mostostal at least once every six months and to the Supervisory Board of Polimex Mostostal at least once a year or whenever these bodies requested. Since the beginning of 2025, the PxM Management Board has discussed the key risks of the Polimex Mostostal Capital Group with the Supervisory Board every two months.

The adopted risk management principles apply to employees of the PxM CG performing tasks for its benefit, regardless of the scope and duration of the agreements concluded.



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The financial risks to which the Capital Group's activities are exposed are described in section 2.2 of the report.

The Polimex Mostostal Capital Group has incorporated the identification and assessment of ESG risks into its existing risk management system. Full implementation and integration with the existing risk management system is planned for 2026.

In 2025, sustainability reporting was not subject to internal control processes. For 2026, audits of areas that may in particular be classified as S1, i.e. HR policy, and G1, i.e. IT security and anti-fraud measures, have been planned as part of the Annual Audit Plan.

The HR policy audit is aimed, among other things, at confirming that the declared HR practices are consistent with reality and legal requirements. The audit will cover, among other things, matters concerning:

- Equality and diversity,
- OHS,
- Employee development,
- Employee relations and human rights, including respect for employee rights, freedom of association and non-discrimination in the workplace.

The IT security audit is aimed at verifying the extent to which standards and procedures in the area of IT risk management are complied with and the extent to which the Capital Group is protected in this area, including in particular in the context of cyber threats, and whether contractor and employee data are properly protected.

The anti-fraud audit will be aimed at verifying how effectively actions minimising this risk are carried out and whether the appropriate categories of employees are covered by them, as well as whether the mechanisms for reporting violations actually ensure the safety of persons reporting such violations, i.e. whistleblowers.



SBM-1 Strategy, business model and value chain

Business model

The Capital Group consists of the parent entity Polimex Mostostal S.A. (also referred to as the “Company” or “PxM”) and its subsidiaries. The Company has been in business continuously since 1945 and, as a public company, has been listed on the Warsaw Stock Exchange since 1997. Polimex Mostostal S.A., as an engineering and construction company with Polish capital, exists to implement strategic projects in key market sectors that are important for the Polish economy, using the latest technologies, maintaining the highest quality standards, respecting the natural environment and promoting sustainable development. The Company carries out specialised investments in Poland and abroad for the energy, petrochemical, gas and environmental sectors. It is a manufacturer and exporter of steel structures, gratings and is involved in galvanising and painting steel structures.

The Capital Group offers comprehensive implementation of projects in the energy industry, both as a general contractor for investments and in consortium arrangements with other entities, including technology suppliers. Its portfolio includes contracts for the largest Polish companies operating in this area.

Polimex Mostostal S.A. and the companies forming part of the PxM CG carry out design, manufacturing and delivery processes for products and services based on implemented internal quality management systems and applicable procedures and industry standards. The technologies, materials and production tools used are adapted to contractual requirements and market standards. The Capital Group implements procedures for the qualification and monitoring of suppliers and subcontractors, striving to ensure the required quality of products and services in accordance with the adopted assessment criteria. In the area of human capital management, actions are carried out to enable employees to improve their professional qualifications and competences, allowing resources to be adapted to changing customer requirements and international standards.

In 2025, the Capital Group adopted the Business Strategy for 2026–2033. This document is available to all Stakeholders on the website. The content of the disclosure in this section of the report was prepared to a significant extent on the basis of this document.

Polimex Mostostal S.A.'s mission:

- We are building the future of the Polish economy – responsibly, modernly, with Polish capital.
- As the Polimex Mostostal Capital Group, we carry out key investments for the energy, oil, gas and chemicals sector, industry and infrastructure, supporting the country’s development and green transition.
- We combine experience, innovation and the highest execution standards, creating value for customers, partners and shareholders.

Polimex Mostostal S.A.'s vision:

The future we are building together

We will be a symbol of modern Polish industrial construction.

Aspiring to join the group of market leaders, we want to set directions for the development of the industry – from innovative technologies, through sustainable construction, to the comprehensive implementation of the most demanding projects.

Our objective is a Capital Group strong in competences, operationally integrated and recognisable in Europe.

Locations of operations

PxM CG sales are made to around 40 countries worldwide, of which the main markets in 2025 were: Poland, Sweden, Germany, Belgium, the Netherlands, France, Latvia, the Czech Republic, Austria, Switzerland, Lithuania, Denmark, Norway. The PxM CG carries out construction projects in Poland and, among others, in Germany, Belgium, the Netherlands, the United Kingdom, France and Sweden.



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Business segments

The Group's activities include in particular:

- comprehensive support for the investment process, completion of deliveries of equipment and industrial installations;
- general contractor in the construction of facilities in the power, industry and public sectors;
- installation of specialist equipment, especially for the petrochemical and energy industries;
- permanent and comprehensive maintenance services of industrial plants
- production of steel structures and platform gratings.

The Group operates in the following segments: Energy, Oil, gas, chemicals, Industrial Construction, Infrastructure Construction, Production and other activities.

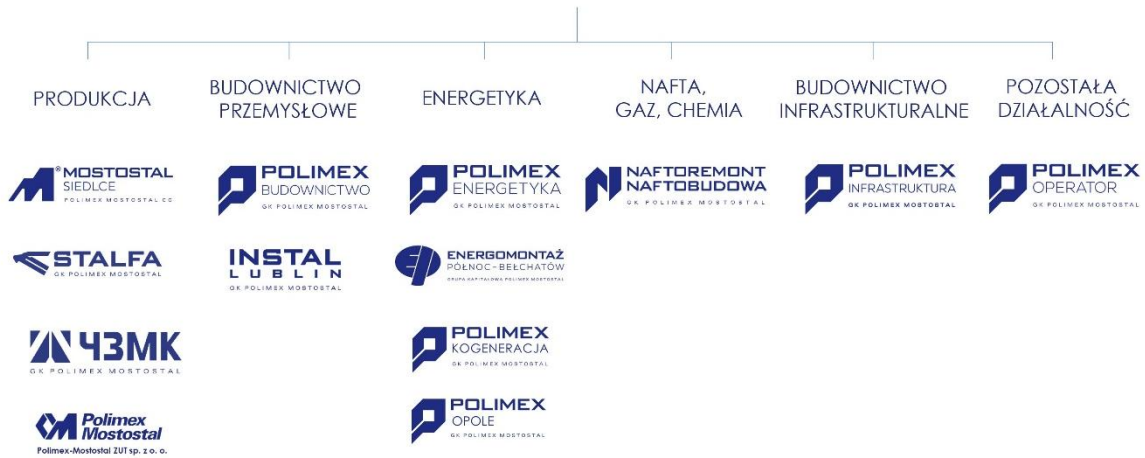
Table 5. Share of business segments in PxM CG revenue for 2025.

Segment	Percentage of revenue of the PxM CG from sales for 2025	Percentage of revenue of the PxM CG from sales for 2024
Production	17.7%	27.5%
Industrial construction	10.1%	14.9%
Power sector	27.2%	20.5%
Oil, gas and chemicals	38.9%	32.0%
Infrastructure construction	6.0%	4.9%
Other activity	0.1%	0.2%
Operations in total	100.0%	100.0%

Revenue of the PxM CG from sales to external Customers	2025		2024	
	Data in thousand PLN	Percentage data	Data in thousand PLN	Percentage data
Domestic revenue	3,491,592	84.5%	2,202,475	77.1%
Foreign revenue, including:	638,897	15.5%	653,419	22.9%
<i>EU</i>	545,417		468,729	
<i>Outside the EU</i>	93,480		184,690	
Total	4,130,489	100%	2,855,894	100%



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Competences of the Polimex Mostostal Capital Group:

POWER SECTOR

The Capital Group conducts activities in Poland and within the European Union in the area of the implementation of energy facilities under the turnkey formula. The scope of services provided includes design, completion of deliveries, construction and installation works, commissioning, performance of required trials and tests, as well as servicing of handed-over facilities during the warranty and post-warranty period. In addition, the Capital Group carries out overhaul and modernisation works on power units, boilers, turbines and auxiliary equipment and other energy installations.

In the area of environmental protection, the offer includes services related to air and water protection, including flue gas desulphurisation installations, dust removal equipment, water treatment plants and solutions in the area of industrial waste management.

In the area of industrial service, the Capital Group provides technical maintenance services for machines, equipment and technological lines in customers' industrial plants from various industries, including energy. The services include ongoing maintenance, inspections, repairs and ensuring the continuous operation of machines in accordance with agreed technical parameters.

Services in the Energy and Service segments are provided by employees experienced in the performance of domestic and foreign contracts. The quality of the services provided is confirmed by implemented quality assurance systems and industry certificates obtained in Poland and other EU countries.

The activities of the Polimex Mostostal Capital Group in the Energy Segment are carried out by Polimex Energetyka sp. z o.o. and Energomontaż Północ Bełchatów S.A.

Scope of activities:

- Implementation of EPC investment projects for utility power generation and cogeneration,
- Modernisation of pressure parts of steam and water boilers, conventional and fluidised bed boilers,
- Modernisation of flue gas cleaning systems,
- Modernisation of auxiliary boiler and turbine systems,
- Assembly of steel structures,
- Assembly of pipelines,
- Installation of pressure equipment,
- Installation of industrial equipment,
- Installation of light enclosures,
- Servicing of machines and equipment.



OIL, GAS, CHEMICALS SEGMENT

The Capital Group provides overhaul services in the refining and petrochemical industry, in particular during shutdowns of technological installations, i.e. turnarounds, which require the coordination of extensive human and technical resources and the performance of tasks within strictly defined timeframes. The Capital Group also carries out the production, installation and commissioning of furnaces and process heaters intended for industrial units.

Activities performed in the petrochemical, refining, chemical and gas industries are carried out in accordance with strict requirements concerning safety, work organisation, quality and compliance with standards applicable on customers' premises. The Capital Group holds technical approval and quality certificates, and its service and product competences are confirmed by references and experience gained during the performance of contracts in Poland and abroad. The staff carrying out these projects have many years of industry experience and qualifications confirmed by relevant licences.

The activities of the Polimex Mostostal Capital Group in the Oil, gas, chemicals Segment are carried out by Naftoremont-Naftobudowa sp. z o.o.

The main areas of activity are:

- implementation of investment projects on an EPC/GW basis, subcontractor,
- Manufacture of complete steel structures, industrial furnaces for refineries, petrochemical and chemical plants,
- Workshop prefabrication, supply, assembly of process equipment and tanks,
- Renovation, modernisation and extension of industrial installations,
- Workshop prefabrication and installation of plants in the area of environmental protection.

INDUSTRIAL CONSTRUCTION SECTOR

The PxM CG carries out industrial and general construction projects in Poland, covering the full scope of works from the design phase, through completion of deliveries of materials and equipment, construction and installation works, deliveries and installation of steel structures, to commissioning, performance of required trials and tests, and handover of facilities to investors. The portfolio of completed investments includes energy facilities, wind farms, sports and recreational facilities, production plants, warehouses, environmental protection facilities, as well as administrative buildings, office buildings, shopping centres and sports halls and stadiums. The scope of services provided may also include support in obtaining the necessary formal and legal permits for investments in progress, if this results from the investor's expectations. All projects are carried out in accordance with the applicable quality policy of the CapitalGroup and in compliance with occupational health and safety regulations and standards.

The activity of the Polimex Mostostal Capital Group in the Industrial Construction sector is carried out by Polimex Budownictwo sp. z o.o. and supported by Instal Lublin S.A. with regard to the execution of projects of heating, ventilation, air-conditioning, sanitary, technological installations, as well as external water, sewage, heat and gas networks, including design.

The company's activities are based on three main pillars:

- Energy construction:
 - power plants,
 - combined heat and power plants,
- General and industrial construction:
 - production plants,
 - storage halls and logistics centres,
 - sewage treatment plants and other environmental facilities,
 - office buildings and educational and sports complexes,
 - shopping centres and multiplexes,
 - sports halls,
 - state administration facilities,
 - sports stadiums,



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- Construction and operation of renewable energy sources:
 - wind farms,
 - photovoltaic farms and installations,
 - biogas plants.

INFRASTRUCTURE CONSTRUCTION SECTOR

The PxM CG carries out infrastructure and building construction projects, including:

- Design and construction of road and bridge infrastructure,
- Design and construction of buildings,
- Construction of hydrotechnical infrastructure,
- Comprehensive supervision of works and contract management (Consultant, Deputy Investor),
- Design and construction of road infrastructure and buildings under clause proceedings.

The offer also includes the provision of services in the area of comprehensive supervision over the execution of works and contract management, including in the role of consultant and substitute investor. The knowledge and experience of technical staff are used in the implementation of projects, and technical solutions resulting from contractual and industry requirements are applied. Completed projects are confirmed by the references obtained.

Companies from the Capital Group hold certificates for quality and environmental management systems, ISO 9001:2015 and ISO 14001:2015, as well as for occupational health and safety management systems, PN- 8001:2004 and OHSAS 18001:2007, issued by DEKRA Certification. These certificates cover implemented procedures concerning both the services provided and the organisation of internal processes.

Polimex Mostostal Capital Group's activities in the infrastructure construction sector are carried out by Polimex Infrastruktura sp. z o. o.

PRODUCTION SECTOR

The Capital Group carries out production activities including in particular the manufacture of steel structures, platform gratings, various types of transport pallets and the provision of services related to steel products, such as anti-corrosion protection, including hot-dip galvanising. The Company is also very active in the area of sales of pallets for the transport and storage of gas cylinders, pallets for construction materials, various types of containers, racks, frames and other small structures.

Production is carried out on the basis of technical documentation supplied by investors or prepared in the design office of the Capital Group on the basis of European standards. The documentation may be prepared in selected foreign languages, depending on the customer's needs.

The Group's production capacity exceeds 3,000 tonnes of steel structures per month, of which approximately 50% is intended for export to customers in more than 40 countries. Mostostal Siedlce sp. z o.o. has a production area of 83,000 m².

Production processes are carried out at plants located in Siedlce, operating on the market since the 1970s.

Integrated quality, environmental and occupational health and safety management systems have been implemented and are maintained in the activities of the Segment, which is confirmed by certificates recognised both in Poland and on international markets. They cover organisational processes, as well as products and services provided. The required industry standards and technical standards applicable to the conducted activities are met. The certificates held are subject to periodic renewal and external audits.

The Group's activities in the production sector are carried out by Mostostal Siedlce sp. z o.o. with production plants located in Siedlce and Rudnik, as well as Stalfa sp. z o.o., Czerwonogradzki Zakład Konstrukcji Stalowych Sp. d. o., Polimex-Mostostal ZUT sp. z o.o.

In addition, the Capital Group includes the following equipment base: Polimex Operator sp. z o.o. rents and leases construction equipment with operator services, including mobile cranes and other equipment such as loaders, telescopic handlers, power tools, welding equipment and material handling equipment. The company provides services in the field of servicing power tools, welding equipment and other construction equipment, including specialised and non-standard equipment.



Sustainable development strategy

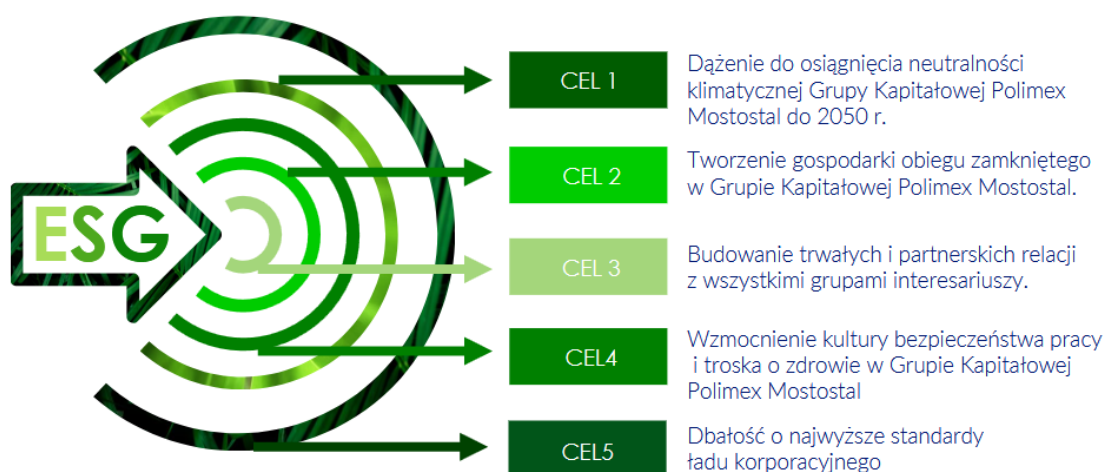
The management of environmental, social and corporate governance impacts has an important dimension for the Capital Group and translates into many of its activities. Sustainability is an integral part of the Company's operations and those of its subsidiaries. It is embedded in the strategy and development plan of the PxM CG for the coming years.

The organisation is aware of the impact of its activities on the environment and takes all steps to ensure that works are organised and carried out with respect for the environment and people. The Management Board of Polimex Mostostal and the management boards and managers of the Capital Group companies undertake initiatives to limit the negative impact of their activities on the natural environment.

The Management Board and the managers of Polimex Mostostal S.A. and the companies in the Group, while promoting solutions to care for people's health, focus on developing the business in a sustainable manner, taking into account social, economic and environmental responsibility, while respecting international standards and good practices.

The Capital Group has taken steps to implement a comprehensive approach to ESG matters and adopted an ESG Strategy in early 2025. The Strategy is based on 5 main objectives. The detailed development of the strategic objectives for each area is described in the disclosures [E1-4][E5-3][S1-5][S2-5][G1].

Cele strategiczne ESG Grupy Kapitałowej



Since 2025, the PxM CG has operated on the basis of two key strategic documents, which are publicly available on the website:

- ESG Strategy of the Polimex Mostostal Capital Group 2025–2035
- Strategy of the Polimex Mostostal Capital Group for 2026–2033

The business strategy provides for further development of activities in key sectors: energy, petrochemicals, industrial, general and infrastructure construction, while strengthening the production Segment. The objective of the Polimex Mostostal Capital Group is to be a symbol of modern Polish industrial construction – based on experience, innovation and the highest quality standards. An integral part of the strategy is sustainable development and compliance with ESG principles, including the highest standards of ethics and corporate governance.



Value chain

Relations with business partners in the PxM CG are subject to uniform rules of conduct established in the Capital Group, covering both contract conclusion processes and ongoing cooperation management. These procedures are aimed at ensuring compliance with relevant standards, transparency and equal treatment of all partners, reducing the risk of violations and strengthening organisational control mechanisms. These principles are described in the updated 2025 version of the Code of Conduct for Contractors of the PxM CG.

The overarching objective of the PxM CG is to implement projects meeting Customers' expectations, with due care for compliance with all legal requirements and implemented and certified Integrated Management System standards according to ISO 9001, ISO 14001 and ISO 45001.

Upstream Stakeholders: these include suppliers and subcontractors responsible for delivering materials, raw materials, semi-finished products, services and technologies necessary for the implementation of investments. These entities directly determine the continuity of works, adherence to schedules, the quality of processes at the production and execution stage, and the level of work safety and costs. Cooperation with these groups determines the effectiveness of implementing technical, environmental and social standards in the initial links of project implementation.

Downstream Stakeholders: these include customers, i.e. ordering parties, distributors and end users of products or services. The requirements defined by ordering parties concern the scope of the order, quality and technical, environmental and social standards implemented in construction, industrial or energy projects. The decisions of these Stakeholders have a significant impact both on the selection of contractors and suppliers and on organisational practices and the approach to managing ESG matters at later stages of implementation and the project life cycle.

The Capital Group operates under an EPC contractor system, which requires it to provide a full range of construction and assembly services, from demolition, foundation and construction works in all sectors, as well as services and supplies related to the installed technology, to technical acceptance and supervision services. The supply chain of the PxM CG includes companies performing construction works, providing services and supplying the necessary materials and technological equipment required for investments under implementation.

As part of subcontracting, the Polimex Mostostal Capital Group primarily contracts:

- prefabrication, delivery and assembly of pipelines,
- delivery and assembly of specialised equipment, such as boilers, turbines, fans, transformers, compressors, heat exchangers, compensators, silencers, busbars and LV and MV switchgear,
- delivery and assembly of electrical, control and measurement equipment, teletechnical and other installations,
- thermal insulation,
- delivery of steel structures and metallurgical materials,
- laboratory services and non-destructive testing,

In addition, for all major investments, the Capital Group contracts scaffolding, purchases reinforcing steel and concrete, as well as many other specialists works.

UPSTREAM – Activities related to the acquisition of resources, technologies, materials, raw materials, and the supply of technologies and machinery that enable further production and the delivery of final services and products.

- **Construction and installation materials, metallurgical materials for the production of steel structures and gratings:** metallurgical materials, welding materials, general materials;
- **Construction, assembly and installation services:**
 - **Installation services:** providers of electrical and mechanical works (e.g. electrical installations, sanitary installations);
 - **Assembly of steel structures:** contractors for the assembly and disassembly of steel structures and precast concrete elements;
 - **Building contractors:** earthworks, roadworks, installation;
 - **Scaffolding suppliers:** companies that supply and install construction scaffolding;
 - **Construction machinery maintenance services:** companies that service construction machinery and equipment, ensuring that it operates correctly;



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- **Engineering services:** providers of technology design, construction studies, surveys, technical audits;
- **Rental of construction machinery:** rental of cranes, excavators, concrete mixers, drills. Plant and machinery service: companies responsible for the maintenance, repair of construction machinery (e.g. cranes, excavators);
- **Energy and fuel suppliers:** companies supplying fuel for construction machinery, electricity for construction;
- **Logistics, transport and storage:** suppliers of construction materials: cement, steel, precast concrete, sheet metal, bars, pipes, stainless steel, scaffolding;
- **Transport companies:** transport of building materials, equipment (excavators, cranes), fuel, construction machinery;
- **Storage service providers:** rental of storage space for the storage of building materials;
- **Maintenance, servicing and environmental protection:** maintenance services: maintenance and repair of IT equipment, construction equipment, machinery, as well as maintenance of construction infrastructure;
- **Environmental companies:** transport and disposal of construction waste, waste separation, recycling;
- **Infrastructure cleaning and repair services:** waste removal, construction site cleaning, construction infrastructure repair;
- **Administrative services and process support:** providers of administrative, outsourcing, printing and marketing services;
- **Financial, insurance and education services:** providers of financial services, insurance, training and courses.

MAIN SCOPE OF ACTIVITIES – activities carried out within the Capital Group's business segments, such as:

- Construction, manufacturing, assembly, design, installation, renovation and servicing;
- Comprehensive implementation of investment projects, both as general investment contractor and in consortia with other entities, including technology suppliers;
- Wide-ranging construction and installation services provided under the general contracting system at home and abroad;
- Administrative and financial services for the companies within its Capital Group, allowing it to optimise its construction project and financial management processes;
- Manufacture of complete steel structures, industrial furnaces for refineries, petrochemical and chemical plants;
- Workshop prefabrication, supply, assembly of process equipment and tanks;
- Renovation, modernisation and extension of industrial installations;
- Workshop prefabrication and installation of plants in the area of environmental protection;
- Energy construction: power plants, combined heat and power plants, heating plants and others;
- General and industrial construction: production plants, warehouse halls and logistics centres, sewage treatment plants and environmental protection facilities, office buildings and educational and sports complexes, shopping centres and multiplexes, entertainment and sports halls, government buildings, sports stadiums;
- Construction and operation of renewable energy sources: wind farms, photovoltaic farms and installations, biogas plants;
- Design and construction of road and bridge infrastructure;
- Design and construction of buildings;
- Construction of hydrotechnical infrastructure;
- Comprehensive supervision of works and contract management (Consultant, Deputy Investor);
- Corrosion protection including hot-dip galvanising and painting of steel structures;
- Other specialised construction works;
- Rental of office and storage space.



DOWNSTREAM – Post-implementation processes of the main activities; includes the execution of construction projects, the activities of transforming steel products into finished building components, their distribution, and further post-construction support and maintenance.

Energy industry and renewable energy sources:

- Energy production: companies producing energy from coal, gas and renewable sources (photovoltaics, wind energy);
- Renewable energy suppliers: manufacturers and suppliers of energy from renewable sources, including those specialising in photovoltaics and other solar solutions. Manufacturers of folding roof systems;
- Energy equipment: manufacturers of energy measurement equipment and systems.

Petrochemical and chemical industry:

- Production of fuels and chemicals: petrochemical groups involved in the production of fuels, energy, mineral oils and specialised refinery oils. Producers of raw materials for plastics and fertilisers (e.g. ammonia);
- Refinery technologies: suppliers of refinery, chemical, gas and energy technologies;
- The companies are involved in the transport and storage of fuels and the handling and storage of fuels.

Construction and infrastructure industry:

- Construction and design: general contractors, subcontractors, technology companies responsible for designing technology and steel structures. Contractors of thermal power plants, waste incineration plants, energy facilities;
- Public buildings and infrastructure: contractors and designers of public buildings, viaducts, bridges, walkways, contractors for technological lines in metallurgy and petrochemistry.

Transport and infrastructure:

- Road infrastructure: companies managing the national road network and operators of road infrastructure;
- Logistics centres: logistics companies, distribution centres.

Supporting sectors:

- Local governments and public institutions: local governments (cities, municipalities, counties), provincial governments and public institutions providing public investments and services to residents.

Development and construction companies:

- Developers: development companies developing industrial and office projects;
- Building owners/administrators: administrators of commercial and industrial buildings.

Specialist sectors:

- Aerospace industry: aircraft maintenance and repair companies;
- Automotive industry: manufacturers of braking systems for vehicles, including parts for cars and motorbikes;
- Armaments and military transport: chassis manufacturers for the military sector;
- Cultural institutions: organisations dedicated to the preservation of cultural heritage and museology.



SBM-2 Interests and views of stakeholders

The key Stakeholder groups of the Capital Group were identified as part of the materiality assessment conducted in 2024 and updated in 2025. The assessment of the materiality of individual Stakeholder groups was based on a two-way impact analysis, taking into account both the impact of the Capital Group on Stakeholders and, conversely, the impact of Stakeholders on the activities of the PxM CG.

In 2025, the understanding of the interests of the Employee group and the Supplier group was deepened through additional surveys. The employee satisfaction survey, in addition to typical questions concerning job satisfaction, also included questions concerning knowledge and the need for development in the ESG area. The supplier survey examined the level of ESG maturity of contractors and planned development in this area, which made it possible to understand how quickly companies in the value chain will follow market trends in this area.

Starting from the mapped value chain, a list of interested parties, i.e. Stakeholders, was prepared and analysed during workshops. Using the “five-question method” developed by Harvard Business Review and adapted for the purposes of materiality assessment, the significance of Stakeholders for the Capital Group was assessed. For stakeholders to be considered as key stakeholders, it was necessary to obtain the required answer to all five questions regarding the assessment of the Capital Group's impact on stakeholders or the impact of Stakeholders on the Group.

Assessing the group's impact on Stakeholders – Criteria:

- Does the organisation have a fundamental impact on Stakeholder interests?
- Can you clearly define what the Stakeholder expects from the organisation?
- Is the relationship dynamic – that is, does the Stakeholder want it to develop?
- Can a Stakeholder exist without the organisation or easily replace it?
- Has the Stakeholder already been identified through another relationship?

Assessment of Stakeholder impact on the group – Criteria:

- Does the Stakeholder have a fundamental impact on the organisation's performance?
- Can you clearly define what you expect from the Stakeholder?
- Is the relationship dynamic – that is, do you want it to evolve?
- Is it possible to exist without a Stakeholder or easily replace one?
- Has the Stakeholder already been identified through another relationship?

Communication activities are carried out with key Stakeholders in order to regularly monitor their opinions, better understand their expectations and inform them of the initiatives undertaken by the Group. Individual Stakeholder groups, directions of cooperation with them, and forms and frequency of communication have been defined in the Stakeholder Engagement Plan. The table below presents the most important information on dialogue with Stakeholders conducted until the end of 2025. The Management Board and Supervisory Board regularly receive up-to-date information on the opinions and suggestions gathered from Stakeholders.



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Table 6. Description of the engagement of Stakeholders of the Capital Group based on the AA1000 Standard.

Stakeholder category	Group/Criteria	Description	Communication Channels
Employees	Employees, trade union organisations, job candidates, educational institutions	The dialogue covers development, work safety, employment conditions and internal communication, competence development and engagement.	Intranet, e-mail, surveys, meetings, both in person and online, events, cascade and direct communication.
Shareholders	Majority shareholders, minority shareholders, individual investors, funds	Ownership oversight of the Group through the Supervisory Board, General Meetings and communication about financial performance, strategy and development plans	ESPI/EBI reports, IR website, results conferences, webinars, investor chats, financial media, direct meetings
Financial institutions	Banks, insurance companies, bondholders, rating agencies, supervisory institutions	They provide financing for the activities and assess the financial condition of the company; relations are based on transparency and credibility of information	Financial reports, periodic meetings, results presentations, teleconferences, e-mail, telephone contact
Customers	Public and commercial ordering parties, covering energy, industry and construction	Customers define the scope of projects and quality requirements, and influence ESG standards and the manner of investment implementation	Direct meetings, project communication, websites, social media, reports, e-mail, telephone
Suppliers	Suppliers of materials, equipment, services, construction works, subcontractors, technical partners	Key partners ensuring continuity of deliveries and project implementation; cooperation based on risk, quality and ESG management	Working meetings, e-mail, telephone, procurement platforms, project meetings, events, e.g. Supplier Day
Industry organisations and associations	Chambers of commerce, industry organisations, investor and technical associations	Cooperation in the area of industry standards, legislation and good practices; building the position of the PxM CG in the industry environment	Meetings, conferences, training sessions, industry newsletters, e-mail, direct communication
Scientific and academic centres	Technical universities, research institutes, technology transfer centres	Partners in the area of innovation, research and development and staff education; they support the development of technologies and competences	Working meetings, R&D projects, conferences, scientific publications, newsletter, cooperation platforms

In PxM CG 's business model, an in-depth understanding of the interests and views of key Stakeholder groups is crucial, which translates into decision-making that promotes the long-term sustainability and sustainable development of the company. For each of these Stakeholder groups, the Capital Group defines evaluation criteria, uses appropriate metrics and regularly monitors the effectiveness of its activities. This approach allows not only the identification of key needs, but also the implementation of solutions that increase value for both the company and all external partners, building lasting relationships based on transparency, accountability and mutual trust.

Apart from regular activities, the most important actions in 2025 aimed at understanding the interests of individual Stakeholder groups were the employee satisfaction survey and the survey among key suppliers and subcontractors.



SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Table 7. List of identified material impacts of the PxM CG .

ESRS	ESG matter	Description of impact	Negative / positive	Actual / potential
E1	Climate change mitigation	Activities related to reducing the carbon footprint.	positive	actual
E1	Climate change mitigation	The construction of gas-fired power plants and combined heat and power plants contributes to increasing greenhouse gas emissions into the atmosphere.	negative	actual
E1	Climate change mitigation	The use in activities of raw materials and products whose production involves the emission of large quantities of GHG, especially cement and steel.	negative	actual
E1	Climate change mitigation	The production, delivery and installation of industrial furnaces and technological equipment by Naftoremont-Naftobudowa in high-emission industrial sectors, such as the metallurgical industry, coking industry, cement industry and petrochemicals, contributes to increasing greenhouse gas emissions.	negative	actual
E1	Climate change mitigation	Overhauls, modernisation and expansion of industrial installations carried out by Naftoremont-Naftobudowa support the transition to less emission-intensive industrial production technologies, which reduces GHG emissions.	positive	actual
E1	Climate change mitigation	The construction of natural gas transmission facilities and installations by Naftoremont-Naftobudowa, which may also be used for the transmission of biogas and green hydrogen, makes it possible to reduce the use of coal in the energy sector and processing industry.	positive	actual
E1	Climate change mitigation	The production of steel structures generates environmental impact through greenhouse gas emissions and the use of raw materials.	negative	actual
E1	Climate change mitigation	Logistics and transport in the performance of contracts increase emissions related to operating activities.	negative	actual
E1	Climate change mitigation	The modernisation of energy infrastructure reduces emissions in power plants and heating plants through the implementation of low-emission technologies.	positive	actual
E1	Climate change mitigation	The implementation of large industrial and infrastructure projects that generate significant CO ₂ emissions, especially in production and logistics processes.	negative	actual
E1	Climate change adaptation	Increasing the resilience of the constructed infrastructure to climate change.	positive	potential
E1	Energy	Activities in the RES infrastructure sector, the construction of industrial photovoltaic installations and hydropower plants by Polimex Energetyka, contribute to the energy transition and the reduction of GHG emissions.	positive	actual
E1	Energy	The activities of the Capital Group companies in such industrial sectors as energy, industrial construction, oil, gas and chemicals are highly energy-intensive and are based to a large extent on the use of energy from fossil fuels, which has a negative impact on climate change.	negative	actual
E1	Energy	Implementation of energy-saving technological solutions in industrial processes.	positive	actual
E2	Pollution of air, water and soil	Workshop prefabrication and installation of installations in the area of environmental protection by Naftoremont-Naftobudowa contribute to limiting negative impacts on the natural environment.	positive	actual
E2	Pollution of air, water and soil	Emissions of pollutants to air, water and soil which may lead to deterioration of environmental quality and human health.	negative	potential



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ESRS	ESG matter	Description of impact	Negative / positive	Actual / potential
E4	Direct impact drivers of biodiversity loss	Investments carried out by the Polimex Mostostal Group, such as the construction of roads, bridges, power plants or industrial plants, lead to changes in land use, which may affect biodiversity and the functioning of local ecosystems.	negative	actual
E4	Direct impact drivers of biodiversity loss	After completion of investments, the company implements land reclamation programmes, which allows the ecological value of transformed areas to be restored. Where this is included in the scope of implementation.	positive	actual
E4	Direct impact drivers of biodiversity loss	In the process of planning infrastructure projects, environmental analyses and strategies aimed at minimising the degradation of natural habitats are taken into account.	positive	actual
E5	Waste	Effective waste management, including recycling, limits negative environmental impact, reduces demand for natural raw materials, contributes to resource savings and reduces emissions related to the production of new materials.	positive	actual
E5	Waste	Lack of segregation and improper waste management may lead to environmental pollution, including soil and water pollution, adversely affect biodiversity and increase greenhouse gas emissions related to waste disposal.	negative	actual
S1	Working conditions	Supervision over the safety of machines and tools. Efficient machines ensuring safety and increasing work efficiency. Tools in good technical condition, properly selected for the scope of works.	positive	actual
S1	Equal treatment and equal opportunities for all	Creating conditions conducive to equality and diversity has a positive impact on employees and their mental well-being and increases the sense of belonging and motivation, which translates into creativity and innovation.	positive	potential
S2	Working conditions	Safe working conditions for workers in the value chain.	positive	potential
S2	Working conditions	Compliance with ethical principles in the supply chain leads to better management of relations with suppliers, a reputational impact and an impact on relations with Stakeholders in disseminating ethical standards in the industry.	positive	actual
G1	Corporate culture	Ethical suppliers improve relations with Stakeholders and increase the company's reputation.	positive	actual
G1	Management of relationships with suppliers including payment practices	Verification of suppliers in terms of their environmental impact helps build responsible business practices and supports the achievement of sustainable development objectives, limits regulatory and reputational risks and enables reporting requirements to be met.	positive	actual
G1	Management of relationships with suppliers including payment practices	Verification of suppliers in accordance with international ISO standards contributes to improving the quality of deliveries, safety and environmental protection and increases the opportunities of these companies for further development.	positive	actual



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Table 8. List of identified risks and opportunities of PxM CG (financial materiality).

ESRS	ESG matter	Description	Risk / opportunity	Time horizon
E1	Climate change mitigation	The need to adapt to new regulations related to reducing greenhouse gas emissions may generate additional costs related to the transition to low- and zero-emission technologies.	risk	medium-term
E1	Climate change mitigation	Access to financing and grants, subsidies or preferential credit terms intended for the transition towards a low-carbon economy. It enhances the company's positive image and builds trust. Stakeholders and investors.	opportunity	medium-term
E1	Climate change adaptation	Increasing long-term competitiveness, costliness of the materials used.	risk	medium-term
E1	Climate change adaptation	Adapting production and operational processes to changing climate conditions creates new business opportunities.	opportunity	long-term
E1	Climate change adaptation	Creating a more sustainable and climate-resilient business. The actions we are currently taking are aimed not only at protecting the environment, but also at ensuring economic and social stability for the years to come.	opportunity	long-term
E1	Energy	Benefits from the energy transition, reduction of dependence on traditional energy sources. Energy from renewable energy sources (RES), including hydropower, biomass energy, wind energy, photovoltaics and geothermal energy.	opportunity	long-term
E1	Energy	Increase in costs related to the implementation of new energy-saving technologies. Costs of investments in decarbonisation technologies, such as the installation of renewable energy sources, changes in production processes or investments in energy efficiency.	risk	medium-term
E1	Energy	Decarbonisation may require significant changes in technology and production processes, which will have a major impact on the organisation's manner of operation and its operations.	risk	long-term
E1	Energy	Reputational risk. Companies that do not implement decarbonisation measures or do not meet customer expectations in the area of sustainable development may lose the trust of their customers and lose competitiveness on the market.	risk	medium-term
E1	Energy	The growing impact of regulatory risks in the area of energy and environmental protection may increase operating costs and result in negative consequences in the absence of regulatory implementation.	risk	medium-term
S1	Working conditions	Accidents at work lead to increased absenteeism and may affect the company's image, reducing its reputation as a responsible employer.	risk	short-term
S2	Working conditions	Cooperation with socially responsible subcontractors improves the company's image, increases the engagement of partners and employees, and builds positive relationships in the value chain.	opportunity	medium-term
S2	Working conditions	Cooperation with companies that do not comply with OHS standards, remuneration standards or work-life balance negatively affects the company's reputation and may lead to the loss of customers, especially those concerned with social and ethical issues.	risk	medium-term
S2	Working conditions	Employee dissatisfaction caused by poor working conditions may translate into reduced interest among subcontractors in cooperation.	risk	medium-term
G1	Corporate culture	Maintaining a positive reputation, increasing customer trust. High ethical standards increase the trust of customers and investors, which stabilises the company's finances.	opportunity	medium-term



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ESRS	ESG matter	Description	Risk / opportunity	Time horizon
G1	Corporate culture	Good governance practices, maintaining high ethical and legal standards. Compliance with ethical principles builds a positive image and organisational stability.	opportunity	medium-term
G1	Cyber security and data protection	Cybersecurity breach, including breaches of personal data protection and privacy. A data protection and privacy breach leads to loss of reputation, financial and legal sanctions, high administrative penalties, loss of Stakeholder trust, e.g. know-how, development plans, loss of confidential information, decline in revenue, which weakens the company's market position, loss of competitive advantage, operational disruptions, the need to implement remedial actions, risk of cyberattacks and escalation, and impact on regulatory compliance.	risk	short-term
G1	Management of relationships with suppliers, including payment practices	Percentage (%) of liabilities paid within the contractual deadline. Failure to make payments on time may lead to contractual penalties, loss of supplier trust and higher financing costs. Delays in settling liabilities may affect the company's reputation and expose it to additional fees and sanctions.	risk	medium-term
G1	Management of relationships with suppliers, including payment practices	Inclusion of ethical principles and ESG reporting requirements in agreements with contractors supports positive relationships and the company's reputation, while at the same time ensuring access to the data necessary for reliable reporting and enabling effective risk management in the value chain. Including ethical principles in agreements with contractors may strengthen positive relationships with suppliers and improve the company's reputation, as well as build stronger long-term partnerships. In addition, this is consistent with ESG requirements, in particular in the "Governance" area, by ensuring transparency and accountability in the supply chain. Such actions minimise the risk of human rights violations, corruption and unfair practices, which supports compliance with the CSRD and the principles of due diligence.	opportunity	medium-term
G1	Management of relationships with suppliers including payment practices	Negative environmental impact in the supply chain may lead to sanctions, environmental penalties and loss of reputation, which in the long term will adversely affect the financial results of the organisation.	risk	medium-term
G1	Corruption and bribery	Effective policies to prevent corruption and anti-competitive behaviour increase Stakeholder trust, improve the company's reputation and ensure compliance with laws, which supports organisational stability and long-term development; additionally, they minimise the risk of financial and legal sanctions, protect against the loss of contracts and strengthen the ethical culture in the organisation, which supports the building of lasting business relationships and competitive advantage.	opportunity	long-term
G1	Corruption and bribery	Business areas where there is a risk of corruption may lead to financial penalties, loss of contracts, legal sanctions and serious damage to the company's reputation. Financial and legal risk.	risk	long-term



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Table 9. Summary of relevant topics with a description of how they are managed by the PxM CG .

Topic	Description of impacts, risks and opportunities and how they are managed
<p>E1 – Climate change – Climate change mitigation</p> <p>Place in the Chain:</p> <ul style="list-style-type: none"> • Downstream • Own operations • Upstream 	<p>The PxM CG focuses on reducing greenhouse gas emissions by improving energy efficiency, optimising processes and gradually increasing the share of energy from low- and zero-emission sources. Activities include the development of an energy management system, i.e. monitoring, analysis and reduction of consumption, modernisation of infrastructure and machinery, and implementation of solutions supporting the reduction of emissions in Scope 1 and 2. At the same time, the PxM CG is developing initiatives to increase self-generation and the purchase of energy from RES, including through the use of guarantees of origin, and is reviewing decarbonisation opportunities for key processes and the supply chain. Progress is measured using indicators, which makes it possible to update activities on an ongoing basis in response to regulatory and market changes. In addition, the PxM CG takes the climate aspect into account in investment and procurement planning, preferring solutions with a lower carbon footprint and a longer life cycle. In areas with the highest emissions, actions are taken to reduce fuel and energy consumption and limit technological losses, in parallel with improving the quality of data for carbon footprint calculations and ESG reporting. Cooperation with key Stakeholders, including suppliers and customers, supports the identification and implementation of measures reducing emissions across the entire value chain, including in Scope 3.</p>
<p>E1 – Climate change – Climate change adaptation</p> <p>Place in the Chain:</p> <ul style="list-style-type: none"> • Downstream • Own operations • Upstream 	<p>The PxM CG focuses on identifying physical risks related to climate change and assessing their impact on business continuity, employee safety and contract performance. Adaptation measures include analysing the sensitivity of locations and processes, including plants, construction sites and infrastructure, to phenomena such as heatwaves, heavy rainfall, flooding or strong winds, and then implementing measures to reduce the effects of such events. The PxM CG is also developing response procedures and business continuity plans, including infrastructure protection, adaptation of work schedules to weather conditions and strengthening the resilience of the supply chain. As part of adaptation, OHS and work organisation standards are also implemented, taking into account heat stress, e.g. recovery breaks, ensuring hydration, changes in working hours, and requirements for work in conditions of heavy rainfall and storms. The effectiveness of adaptation measures is verified cyclically on the basis of monitoring weather events, technical reviews and conclusions from incidents, which makes it possible to update plans and priorities in subsequent years.</p>
<p>E1 – Climate change – Energy</p> <p>Place in the Chain:</p> <ul style="list-style-type: none"> • Downstream • Own operations • Upstream 	<p>A key direction of the PxM CG’s activities is to reduce emissions by improving energy efficiency and optimising energy consumption in production plants, offices and projects. The implementation of this approach is based on the implementation of an energy management system, covering rules, procedures and tools for monitoring, analysing and reducing consumption, and on the modernisation of machinery and equipment towards more energy-efficient solutions. These actions support the achievement of reduction targets, in particular in Scope 2, and limit cost and regulatory risks related to the energy transition. In addition, the PxM CG strives to increase the share of energy from renewable sources, including through the development of self-generation, i.e. PV installations, and the use of market instruments such as guarantees of origin. At the same time, actions are carried out to optimise the energy mix, including increasing self-consumption, reducing losses and improving the consumption profile, which translates into the stabilisation of energy costs. The effects of implementations are monitored through a set of indicators, which enables regular verification of progress and updating of activities in response to regulatory and market changes.</p>
<p>E2 – Pollution – Pollution of air, water and soil</p> <p>Place in the Chain:</p> <ul style="list-style-type: none"> • Downstream • Own operations 	<p>The activity of Polimex Mostostal Capital Group in the production and construction sector generates emissions of pollutants into the air, water and soil, which affects the quality of the environment, especially in the direct vicinity of the investments and production facilities under construction. Processes such as welding, corrosion protection (painting, galvanising) and the combustion of fuels in internal combustion engines contribute to emissions of carbon oxides (CO), nitrogen oxides (NOx), sulphur oxides (SOx), particulate matter (PM10) and organic compounds (NMVOC), among others. Additional sources of environmental pressure are industrial wastewater and waste resulting from the technological processes carried out.</p> <p>The Capital Group is taking action to reduce negative impacts through a systematic approach to monitoring emissions and implementing corrective actions. Regular measurements of air emissions and control of the quality of wastewater discharged and the amount of waste generated are carried out in accordance with current legislation and administrative requirements. The environmental management system implemented in accordance with ISO 14001 supports the identification of environmental aspects.</p>



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Topic	Description of impacts, risks and opportunities and how they are managed
<p>E3 – Water and marine resources – Water Place in the Chain: • Own operations</p>	<p>Polimex Mostostal Group's activities have an impact on water resources, particularly in the context of groundwater withdrawals and wastewater discharge from industrial and service processes. PxM CG 's production facilities and infrastructure projects require the consumption of significant amounts of water, mainly for technological processes such as cooling in the hot-dip galvanising plant.</p> <p>In the area of water management, the PxM CG currently operates on the basis of applicable laws, the terms of administrative decisions, including water permits, and internal procedures for monitoring water abstraction and consumption.</p>
<p>E4 – Biodiversity and ecosystems – Direct impact drivers of biodiversity loss Place in the Chain: • Downstream • Own operations • Upstream</p>	<p>As at the date of preparation of this report, the PxM CG does not have a separate transition plan or integrated policy on biodiversity and ecosystems. These matters are currently managed through compliance with applicable laws, the terms of administrative decisions and environmental documentation at the level of individual projects. Compensatory actions and reclamation measures are implemented in accordance with project and legal requirements. In the coming years, the Capital Group plans to develop systems for assessing and monitoring its impact on local ecosystems, implement uniform rules for nature analyses and increase the scope of environmental training. The adoption of an integrated biodiversity policy together with the development of the environmental management system is being considered.</p>
<p>E5 – Circular economy – Waste Place in the Chain: • Downstream • Own operations • Upstream</p>	<p>The production of steel structures and the use of construction materials in projects are associated with high resource consumption, including materials such as steel, concrete, asphalt and aluminium, which contributes to a significant environmental impact. The use of primary raw materials, including natural aggregates and raw materials necessary to produce the aforementioned materials, constitutes a significant element of resource consumption in the projects carried out.</p> <p>A key direction of the PxM CG's activities is the optimisation of resource use through precise production planning and optimisation of material orders, increasing the share of secondary raw materials and recycled materials wherever technically and project-wise justified.</p> <p>The PxM CG strives to reduce the mass of waste generated and develops cooperation with specialised entities involved in waste recovery and recycling. Transferred waste is subjected to processing and reintroduced into the economic cycle, which increases the availability of secondary raw materials on the market and reduces demand for primary raw materials.</p> <p>These activities contribute to increasing the overall level of recovery of industrial and construction waste and support the reduction of demand for primary raw materials on a market scale. The designated directions are a response to applicable regulations, in particular at European Union level, and to growing customer expectations in the area of sustainable development.</p>
<p>S1 – Own workforce – Working conditions Place in the Chain: • Own operations</p>	<p>Polimex Mostostal Capital Group's activities have a significant impact on its employees, who are a key resource of the organisation and play a fundamental role in the implementation of the Capital Group's strategy. As one of the largest employers in the construction and manufacturing industry, the Capital Group manages both production teams exposed to physical and chemical factors in the workplace and administrative and office teams who face the risk of ergonomic strain associated with working at a computer.</p> <p>The Capital Group consistently implements policies and procedures to ensure a safe, ethical and equal working environment. Anti-harassment, anti-discrimination and the promotion of equal opportunities and respect for employee rights are an integral part of the organisational culture. In addition, the applicable Labour Regulations and Collective Bargaining Agreements ensure compliance with national and international standards in the area of employee rights protection and the creation of friendly working conditions.</p> <p>In order to reduce occupational risks, GK PxM conducts ongoing health and safety monitoring and implements preventive measures such as ergonomics training, selection of appropriate personal protective equipment and educational campaigns on occupational safety. The Capital Group involves employees in decision-making processes, including through ESG consultations and dialogue with trade union representatives.</p> <p>Through measures such as social support, benefit schemes and pro-social initiatives, the Capital Group promotes the well-being of its employees and builds stable internal relationships. The Capital Group's human resources management policy is based on respect for human rights, transparency in communication and the implementation of solutions to create a stable and safe working environment.</p>



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	<p>The PxM CG is a company with a higher share of male employees. Such an employment structure by gender is characteristic of the industries in which the PxM CG Companies operate. Age management is a challenge for the PxM CG. The vast majority of employees are over 40 years old. At the same time, the share of persons from the youngest generations, up to 25 years old, among total employees is negligible, which does not balance the share of persons aged 60+ in the employment structure. The dominant group by length of service consists of persons employed for less than 15 years, with a clear predominance of employees with 1 to 4 years of service. In the PxM CG, the dominant form of employment is full-time employment under an employment contract concluded for an indefinite period. As a standard, in the case of newly hired persons, the contract is concluded for a probationary period and then for a fixed term.</p>
<p>S2 – Workers in the value chain – Working conditions Place in the Chain:</p> <ul style="list-style-type: none"> • Upstream • Own operations 	<p>Due to the specific nature of the construction sector and the extensive use of subcontractors and suppliers, the Capital Group identifies the safety and working conditions of workers in the value chain, in particular on construction sites, as a material topic. This area involves the risk of accidents at work, diversity of OHS standards and the risk of non-compliance with labour law requirements. The PxM CG supports initiatives aimed at reducing the number of accidents and eliminating the root causes of hazards in the construction sector. This initiative, launched in 2010 by the largest general contractors in Poland, aims to achieve the overarching goal of “Zero accidents” in the construction industry. The PxM CG supports initiatives aimed at reducing the number of accidents and eliminating the root causes of hazards in the construction sector.</p> <p>The Capital Group manages this area through the application of internal OHS standards, safety monitoring on construction sites, training for employees and subcontractors, audits of business partners and educational activities promoting a safety culture. In countries with lower regulatory requirements, the PxM CG applies its own procedures ensuring compliance with the standards of the Capital Group and good industry practices.</p>
<p>G1 – Corporate governance – Management of relationships with suppliers including payment practices – Corporate culture – Cyber security and data protection Place in the Chain:</p> <ul style="list-style-type: none"> • Downstream • Own operations • Upstream 	<p>The Polimex Mostostal Capital Group has a significant impact on the area of corporate governance, managing a complex organisational structure involving both the parent company and subsidiaries. Through the implementation and development of an integrated management system based on high ethical, legal and organisational standards, the PxM CG ensures compliance with applicable regulations and best practices in corporate supervision and risk management.</p> <p>The Capital Group's activities focus on building transparent decision-making structures, effective compliance management and business ethics, anti-corruption and creating a responsible supply chain. An important element of the organisational culture is the Code of Ethics and a number of internal policies and procedures that set standards of conduct for employees, managers and business partners.</p> <p>The Capital Group maintains an open dialogue with internal and external Stakeholders, ensuring transparency in its relations with the market and compliance with legal regulations and guidelines of international organisations such as the OECD, UN and ILO. The whistleblowing system and whistleblower protection is also a key element of corporate governance management.</p> <p>By implementing tools such as an integrated risk management system, internal audits and systematic controls, the GK PxM minimises the risks of corruption, non-compliance or supply chain disruption. At the same time, through the development of transparent payment practices and maintaining high-quality relationships with contractors, the Capital Group strengthens its credibility and operational stability.</p> <p>The Capital Group recognises the growing threats in the area of cybersecurity and therefore consistently implements measures aimed at increasing the level of information protection and ensuring the continuity of the organisation's operations. The initiatives undertaken include both raising employee awareness of cyber threats and the implementation of advanced technical safeguards and system solutions.</p>



IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

Double materiality assessment methodology:

- **Understanding the context**

- The external context includes:
 - analysis of the legal and regulatory framework in which the company operates;
 - analysis of sector and industry standards and company-specific databases;
 - value chain analysis.
- The internal context includes:
 - the organisation's strategy,
 - business model,
 - risk management systems,
 - resources and operational processes.

- **Stakeholder identification**

Understanding who influences the PxM CG and who is affected by its actions. Analysis of the Capital Group's documents in order to identify current and potential Stakeholders; individual consultations within the responsibility of offices and with other Stakeholders.

- **Stakeholder involvement**

Creating questions about the relevance of issues that take into account different stakeholder perspectives – workshops with the implementation team and representatives of various stakeholders, organising meetings with representatives of companies from the Capital Group, conducting surveys and interviews to gather opinions from different groups.

- **Identification and assessment of IROs**

Each social, environmental and management issue was analysed in terms of material impacts, risks and opportunities. The ways in which different areas of significance affect the group and its Stakeholders were identified.

Double materiality assessment

The double materiality assessment process in the PxM CG was carried out on the basis of the ESRS 1 and 2 guidelines and EFRAG recommendations. The update of the materiality assessment was carried out according to structured steps, based on the collected submissions and analyses from 2024. The process included an analysis of the impacts, risks and opportunities (IRO) of each Segment and their assessment in terms of materiality from the impact and financial perspectives, taking into account the entire Polimex Mostostal Capital Group, ensuring Stakeholder participation and integration with the management processes of the Polimex Mostostal Capital Group. It covers both Segment-specific matters and issues material from the point of view of the entire PxM CG, including aspects related to the value chain and the dynamics of external and internal conditions. The process included:

- cyclical meetings of the ESG team and ESG coordinators in subsidiaries in order to aggregate data on impacts, risks and opportunities;
- analyses of regulatory changes and preparation of recommendations for the activities of the Capital Group;
- ongoing consultations with the Management Board and managers and discussion of material topics;
- benchmarking and external consultations, including analysis of ESG trends, participation in industry webinars and comparison of good practices;
- application of a unified materiality assessment methodology, including identification of impacts, risks and opportunities (IRO), assessment of materiality from impact and financial perspectives, consolidation of results and consultations with Stakeholders;
- presentation of the results to the Management Board and broad involvement of key persons in the Group, including offices, coordinators, subsidiaries and reporting persons, among others through the organisation of workshops explaining the process and the role of individual units in the analysis.



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Data used for the assessment:

The data used to update the double materiality assessment in 2025 included information from the internal, market and regulatory environment. The process took into account the results of consultations with Stakeholders, including employees, management staff, key contractors and suppliers in the Capital Group’s value chain, as well as survey results. Corporate documents were analysed, including annual reports, financial statements, press releases, policies, strategic documents and workshop materials, as well as industry publications, market reports and benchmarks. The process also used EFRAG guidelines and documentation, continued mapping of disclosure consistency with recognised international standards, and monitored current legislative changes at EU and national levels. The collected data were compiled and assessed using materiality matrices, and then subjected to further consultations within the PxM CG structures.

Relevant topics analysed

During the update of the double materiality assessment for the Capital Group, material topics covering a broad range of sustainability issues were collected. The impact on the company's business objectives, finances and reputation was also examined. The list of topics that were analysed includes sustainability matters covered in ESRS 1, APPENDIX A, AR 16. The process of updating the double materiality assessment included an assessment of external and internal factors:

External context: an analysis was carried out of the legal and regulatory framework affecting the activities of the Capital Group, sector and industry standards, and external databases and good practices, as well as the full value chain of the Capital Group, covering own operations, suppliers, customers and business partners.

Internal context: the analysis took into account the strategy and business model of the Capital Group, key operational processes, risk management systems, organisational structure and resources necessary to implement the Capital Group’s strategy. These activities constituted the basis for the proper identification of material impacts, risks and opportunities within the meaning of ESRS and ensured the completeness of the double materiality assessment from the organisational and market environment perspectives.

Materiality of topics for Polimex Mostostal Group.

Impact materiality assessment

During the analysis, the starting point was the impacts generated, some of which in turn caused specific risks or opportunities for the Capital Group. In individual cases, external risks unrelated to impacts also emerged. For each impact identified, materiality was assessed based on the ESRS assumptions and the EFRAG IG1 Implementation Guidance. In assessing impacts, consideration was given to Probability, Severity (Scale and Extent of Impact) and Repairability (see table below for details of thresholds applied). The risks and opportunities identified and assessed in the materiality assessment process were assessed independently of business risks and were not ranked against them. They are complementary to business risks. The double materiality assessment process will be subject to internal control in subsequent years.

Table 10. Impact materiality assessment methodology.

		[Weight]				
Type of impact	Effect	Severity	Severity	Probability	Repairability (reversibility of the process)	Partial result of the impact materiality analysis
		Scale	Scope			



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Table 11. Scales and thresholds used in assessing impact materiality.

Severity of impact			
Probability	Scale of impact	Scope of impact	Repairability (reversibility of the process)
0 – negligible (<5%)	0 – negligible – negligible social or environmental impact	0 – negligible	0 – easily repairable (costs up to 10,000 in less than 1 month)
1 – very unlikely (>5%)	1 – very low – minimal or negligible social or environmental impact	1 – insignificant (1 or 2 municipalities – a few customers / residents / employees)	1 – relatively easy to fix (costs between 10,000 and 100,000 in 1-2 months)
2 – unlikely (>20%)	2 – local (the scenario has a social or environmental impact but does not affect health (community and ecosystem), relationships and long-term access to basic services and rights (food, water, communication, etc.)).	2 – locally concentrated (3 to 10 municipalities – up to 1% of clients/residents/employees)	2 – repairable with some effort (costs up to 1million in 1 or 2 quarters)
3 – possible (>40%)	3 – medium (scenario has a social or environmental impact that has little impact on health, relationships and long-term access to basic services and rights (food, water, communication, etc.))	3 – medium (1-2 provinces – up to 10% of customers/residents/employees)	3 – difficult to repair (costs up to 12.5 million over 1 or 2 years)
4 – likely (>60%)	4 – high (the scenario affects public health or the environment, relationships and long-term access to basic services and rights (food, water, communication, etc.)).	4 – widespread (several provinces, the country or some regions up to the whole country – up to 60% of customers/residents/employees)	4 – very difficult to fix (costs > 12.5 million and over 2 years)
5 – very likely (>70%)	5 – very high (the scenario has a direct and significant impact on the chances of survival of citizens or environmental elements (ecosystems, species, etc))	5 – global (impact at country level – >60% of customers/residents/employees)	5 – irreversible

Financial materiality assessment:

In the process of updating double materiality for 2025, the financial materiality assessment was carried out on the basis of determining the scale of the potential financial impact of individual risks and opportunities and analysing the probability of their occurrence. Threshold criteria consistent with those applied in the previous reporting cycle were used, which ensured comparability and continuity of the financial materiality assessment process in accordance with the ESRS guidelines.



Table 12. Methodology for assessing financial materiality.

	[Weight]			
Risk/opportunity	Scale of financial severity	Probability	Time horizon	Partial result of the financial materiality analysis

Table 13. Scales and thresholds used in assessing financial materiality.

Probability	Scale of financial impact (financial impact)
0 – negligible (<5%)	0 – negligible; < PLN 100 thousand
1 – very unlikely (>5%)	1 – insignificant; PLN 100,000 – PLN 1 million
2 – unlikely (>20%)	2 – small; PLN 1–2.5 million
3 – possible (>40%)	3 – substantial; PLN 2.5–20 million
4 – likely (>60%)	4 – large; PLN 20–60 million
5 – very likely (>70%)	5 – critical; > PLN 60 million

Stakeholder involvement

The preliminary results of the materiality assessment were confronted and supplemented by stakeholder views. Opinions were collected through an online survey among the identified key Stakeholders of PxM CG . Relevant topics were aggregated, average scores were calculated and compared with the survey responses.

In assessing the survey results, there was a high degree of convergence between the themes identified by Stakeholders and those identified as material impacts, risks and opportunities by the project team. All Stakeholder-identified areas (at topical ESRS level) were assessed as relevant and have been included in the sustainability statement.

Summary and results

The assessment of double materiality for the Capital Group has identified key themes relevant to sustainability. Based on the results, the Capital Group commits to:

- Implement specific actions in each segment to improve performance on relevant topics.
- Continue dialogue with Stakeholders to monitor changes in their expectations and needs.
- Prepare and implement an ESG strategy together with an ESG reporting procedure within the capital group.
- Regularly update its sustainable development strategy based on changing market conditions.
- Prepare the Capital Group for the implementation of ESRS data points in accordance with *EFRAG IG 3 Detailed guidance on the implementation of ESRS data points*.

The double materiality analysis report forms the basis for further work on the PxM CG's sustainability issues and is a document open to Stakeholder consultation.

As part of the annual verification of the double materiality assessment carried out in 2025, a detailed analysis of all material topics of sustainability assessment was carried out. The results of this update indicate that no significant, cross-cutting changes occurred that would affect the overall classification of topics and the hierarchy of their importance compared with 2024. Minimal differences and minor modifications were identified both in the descriptions of individual material topics and in the materiality, weights assigned to them. These modifications included clarification of the scope of impacts, editorial expansion of risk descriptions, adjustment of the time horizon, severity scale and updating of the probabilities of materialisation of certain risks. In several cases, a formal update of classification or the addition of new aspects took place. Cyclical reviews of the materiality assessment process will continue to be carried out, new trends will be monitored and descriptions and assigned weights will be updated in order to maintain compliance with ESRS and CSRD requirements, together with ongoing communication with Stakeholders.



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As a result of the work, the following changes were introduced:

- Cybersecurity / personal data protection – the entry was modified – the description of the risk was expanded to include financial, legal and operational consequences, including administrative sanctions, loss of know-how and operational disruptions. The probability of the risk materialising was increased. The scope of impact was clarified, covering own operations and downstream. The item was maintained as financially material.
- Biodiversity and ecosystems (E4) – the topic were maintained in the matrix without changing the level of materiality. An adjustment to the scope of reporting has been made - formal E4 reporting has been deferred, while maintaining a full assessment of potential long-term impacts (restoration, habitat protection).
- Ethical principles in agreements with contractors – the wording was modified and the probability was increased. The description was expanded to include aspects of access to ESG data, risk management in the value chain and compliance with the CSRD. The nature of the entry was changed – from interpretation as an opportunity towards a governance risk/obligation.
- Employee knowledge and competences – the description was modified and the severity scale was increased. The risk was linked directly to operational efficiency, work safety and innovation. The horizon was clarified as medium-term.
- Employee turnover / loss of key employees – a new entry was added to the matrix. The risk of increased recruitment and training costs and disruption to the continuity of project implementation was identified. A medium-term impact horizon was established and severity was increased.
- Equality, diversity and well-being – the description of the existing entry was expanded. The positive impact on morale, engagement, creativity, innovation and employer attractiveness was clarified. No change in materiality classification.
- Whistleblower protection / whistleblowing – the wording was modified by clarifying the consequences of the lack of whistleblower protection, including court proceedings, penalties, loss of reputation and increased turnover. The description of financial and reputational effects was strengthened.
- Supplier verification and anti-corruption policies – the wording was expanded to include the impact of supplier verification on reducing regulatory, reputational and environmental risks. The significance for meeting ESG reporting requirements was clarified.
- Land reclamation after investments – the description was expanded – information was added on the implementation of reclamation programmes after completion of investments, if the project scope includes this. No change in the level of materiality.
- Competitiveness and costliness of materials – the entry was modified – reclassified from long-term to medium-term, severity was increased and it was clearly defined as a financial risk related to material costs and competitive pressure.
- Gas transmission infrastructure – the description was modified – it was clarified that gas installations may also be used for the transmission of biogas and green hydrogen. The change is editorial and clarifying in nature, with no change in materiality.
- Working conditions / accident rate – the risk assessment was modified – the probability was increased from level 1 to level 2. The financial effects related to treatment, rehabilitation and insurance costs were clarified.
- GHG emissions – construction of gas-fired power plants and combined heat and power plants – the wording was modified – it was clearly indicated that the implementation of conventional gas installations leads to an increase in greenhouse gas emissions. No change in scope; clarification of environmental impact.
- Remuneration / labour market – a new entry was added. A risk concerning pay inequalities was identified, which should be monitored on the basis of applicable pay bands and periodic analysis carried out in order to adapt to market conditions – mechanism being introduced. It was defined as a short-term risk with low financial severity.



IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The scope of disclosures presented in the sustainability statement results from the double materiality analysis process described in disclosure IRO-1.

Table 14. Table of completeness and compliance of disclosures with ESRS.

Disclosure no.	Name of disclosure	Page number in the report
ESRS2 – GENERAL DISCLOSURES		
BP-1	General basis for preparation of sustainability statements	5
BP-2	Disclosures in relation to specific circumstances	7
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GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	13
GOV-3	Integration of sustainability-related performance in incentive schemes	14
GOV-4	Statement on due diligence	15
GOV-5	Risk management and internal controls over sustainability reporting	15
SBM-1	Strategy, business model and value chain	19
SBM-2	Interests and views of stakeholders	28
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	30
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	37
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IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities related to climate	49
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E1-7	GHG removals and GHG mitigation projects financed through carbon credits	58
E1-8	Internal carbon pricing	58
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ESRS E2 – POLLUTION		
IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	58
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ESRS E3 – WATER AND MARINE RESOURCES		
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E3-5	Anticipated financial effects from water and marine resources-related risks and opportunities	n/a
ESRS E4 – Biodiversity and ecosystems		
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	65
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	65
IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	66
E4-2	Policies related to biodiversity and ecosystems	66
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E4-4	Targets related to biodiversity and ecosystems	67
E4-5	Impact metrics related to biodiversity and ecosystems change	67
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	n/a
ESRS E5 Circular economy		
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E5-3	Targets related to resource use and circular economy	69
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G1-1	Corporate culture and business conduct policies	100
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G1-3	Prevention and detection of corruption and bribery	104
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G1-5	Political influence and lobbying activities	105
G1-6	Payment practices	105

Table 15. List of data points included in cross-cutting standards and thematic standards that result from other EU legislation.

Disclosure requirement and associated data point	(page number)
ESRS 2 GOV-1 Board's gender diversity paragraph 21(d)	8
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21(e)	8
ESRS 2 GOV-4 Statement on due diligence paragraph 30	15
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40(d)(i)	n/a
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40(d)(ii)	n/a
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40(d)(iii)	n/a
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40(d)(iv)	n/a
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14	47
ESRS E1-1 Undertakings excluded from Paris-aligned benchmarks paragraph 16(g)	47



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Disclosure requirement and associated data point	(page number)
ESRS E1-4 GHG emission reduction targets paragraph 34	52
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	53
ESRS E1-5 Energy consumption and mix paragraph 37	53
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	n/a
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	57
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	58
ESRS E1-7 GHG removals and carbon credits paragraph 56	58
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	n/a
ESRS E1-9 Disaggregation of amounts by acute and chronic physical risk paragraph 66 (a)	n/a
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)	n/a
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c)	n/a
ESRS E1-9 Degree of exposure of the portfolio to climate- related opportunities paragraph 69	n/a
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	62
ESRS E3-1 Water and marine resources paragraph 9	63
ESRS E3-1 Dedicated policy paragraph 13	63
ESRS E3-1 Sustainable oceans and seas paragraph 14	63
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	64
ESRS E3-4 Total water consumption in m per net revenue on own operations paragraph 29	64
ESRS 2 IRO1-E4 paragraph 16(a)(i)	66
ESRS 2 IRO1-E4 paragraph 16(b)	66
ESRS 2 IRO1-E4 paragraph 16(c)	66
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	66
ESRS E4-2 Sustainable ocean/sea practices or policies paragraph 24(c)	66
ESRS E4-2 Policies to address deforestation paragraph 24(d)	66
ESRS E5-5 Non-recycled waste paragraph 37 (d)	72



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Disclosure requirement and associated data point	(page number)
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	72
ESRS 2 SBM-3-S1 Risk of incidents of forced labour paragraph 14 (f)	78
ESRS 2 SBM-3-S1 Risk of incidents of child labour paragraph 14 (g)	78
ESRS S1-1 Human rights policy commitments paragraph 20	80
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	80
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	79
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	79
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	81
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	92
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	92
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	94
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	94
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	94
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	94
ESRS 2 SBM-3-S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	95
ESRS S2-1 Human rights policy commitments paragraph 17	96
ESRS S2-1 Policies related to value chain workers paragraph 18	96
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	96
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	96
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	98
ESRS S3-1 Human rights policy commitments paragraph 16	n/a
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	n/a
ESRS S3-4 Human rights issues and incidents paragraph 36	n/a
ESRS S4-1 Policies related to consumers and end-users paragraph 16	n/a



Disclosure requirement and associated data point	(page number)
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 17	n/a
ESRS S4-4 Human rights issues and incidents paragraph 35	n/a
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	100
ESRS G1-1 Protection of whistleblowers paragraph 10(d)	101
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	104
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	104

ESRS E1 – CLIMATE CHANGE

GOV-3 Integration of sustainability-related performance in incentive schemes

In 2025, climate matters were not taken into account in relation to the remuneration of members of the Supervisory Board or the Management Board.

For 2026, the Supervisory Board set the Vice-President of the Management Board for Finance objectives in the area of sustainability reporting, including those related to climate change mitigation:

- Ensuring the timely course of the audit of the ESG report
- Development of a package of initiatives for the decarbonisation strategy in the PxM CG
- Development of a “green business travel” policy as an element of the business travel procedure.

E1-1 – Transition plan for climate change mitigation

The Polimex Mostostal Capital Group has an approved “Strategy of the Polimex Mostostal Capital Group for 2026–2033” and “ESG Strategy of the Polimex Mostostal Capital Group”, which indicate directions for sustainable development, including in particular directions and actions in the area of climate change mitigation. These documents are disseminated within the Capital Group, and the initiatives arising from them are implemented at various operational levels within the companies forming part of the PxM CG. The Transition Plan for climate change mitigation itself is under development.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

Resilience analysis

The PxM CG conducted an analysis of the resilience of its activities to climate risks. This analysis covered physical risks in particular, while a methodology for identifying and assessing transition risks related to the transition to a low-carbon economy was developed. The process of analysing these risks will be carried out in subsequent reporting periods.

The analysis was carried out in relation to all key locations and assets of the PxM CG in Poland. As part of the identification of climate hazards, 28 types of climate risks that may affect the company’s activities in various sectors and regions were analysed. These risks were classified according to the sources of their occurrence, including:

- climate change and related weather phenomena,
- regulatory and political changes,
- technological changes,



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- changing social and market preferences.

The analysis covered both acute physical risks and chronic risks, such as long-term changes in temperature or availability of water resources.

Analysis methodology

The climate risk assessment was carried out using the scenario method, which is commonly used in climate analyses and risk management. This method consists of simulating various scenarios of climate development and possible economic, political and technological responses to climate change.

The analysis was carried out using two complementary approaches:

- Expert method – A team of experts in the fields of climate, economics and risk management assessed potential hazards on the basis of available data, sector analyses and experience from similar cases.
- Scenario method – Simulations of various climate scenarios were carried out in order to assess the potential impact of climate change on the activities of the PxM CG in the future.

Scope of the analysis

The resilience analysis was carried out for selected locations of the PxM CG's activities. These locations were assessed in terms of their sensitivity and exposure to climate risks, taking into account:

- local climate conditions,
- availability of natural resources,
- condition of infrastructure,
- specific nature of the conducted activities.

Two-time horizons were applied in the analysis:

- short-term – up to 10 years,
- long-term – up to 30 years.

The use of extended time horizons in climate analysis results from two factors:

- climate change is a slow process and therefore the potential consequences of these changes can be observed over periods measured in decades rather than individual years,
- from the perspective of the type of activity conducted, the short-term perspective of 10 years is the contract performance period plus the warranty period. The long-term perspective of 30 years is the assumed durability period of own investments.

The assessment included an analysis of the extent to which assets and economic activity may be exposed and vulnerable to identified climate hazards, as well as the organisation's ability to adapt to these changes.

Results of the analysis

As a result of the analysis carried out within the examined scope, no climate risks assessed above a moderate level were identified. This means that in the analysed locations and with the adopted time horizons, the activities of the PxM CG show relatively high resilience to projected climate change.

Based on the analyses carried out for key properties and projects of the PxM CG, it was determined that the assets examined do not currently show material vulnerability to identified climate hazards within the adopted horizon and according to the methodology used.

The assessment also included an analysis of the exposure and vulnerability of assets to identified climate risks. This provides the basis for further analyses and the development of potential adaptation measures.

It should be emphasised that the analysis carried out focused on the impact of climate change on the activities of the PxM CG, and not on the impact of the company's activities on climate change.



Analysis of transition risks

The PxM CG developed a methodology for identifying and assessing transition risks related to the transition to a low-carbon economy. This methodology focuses on analysing the impact of:

- regulatory changes,
- development of new technologies,
- changes in consumer and market preferences on the company's activities.

As part of the planned analysis, assets and areas of activity that may be particularly exposed to the effects of climate transition will be assessed, including among others:

- changes in regulations concerning greenhouse gas emissions,
- changes in the availability and costs of raw materials,
- development of low-emission technologies.

This analysis will use climate scenarios that will allow potential consequences of the climate transition for the activities of the PxM CG to be assessed in various time horizons. The applied climate risk analysis methodology enables the PxM CG to systematically identify and assess both physical risks and transition risks related to climate change.

The use of scenario analysis enables the prediction of potential threats and opportunities arising from climate change, as well as the appropriate adaptation of the company's strategy and business model to changing economic and regulatory conditions.

The analysis was prepared using publicly available national and European sources, including materials of the Ministry of Climate and Environment, the National Fund for Environmental Protection and Water Management, the EEA, Climate-ADAPT and the Klimada 2.0 database.

IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

IDENTIFICATION OF CLIMATE RISKS

Physical risks

Physical risks are the effects of climate change due to extreme weather events and long-term climate change. The analysis was based on IPCC methodology. It was assumed that the level of materiality of the risk here results from dynamic interactions between the following categories:

- Climate hazards – physical phenomena (storms, floods, fires, heat waves, droughts) and climate change (rising temperatures, rising sea levels, water restrictions) that threaten people, infrastructure and the environment.
- Exposure – the presence of people, property and ecosystems in areas exposed to these hazards.
- Vulnerability – the sensitivity of systems to climate impacts and their adaptive capacity (social, economic, environmental).

Hazards were divided into:

- Sudden events – extreme weather and geological phenomena (e.g. storms, floods, landslides).
- Long-term changes – climate change leading to environmental and natural resource degradation.

Transition risks

The analysis of transition risks has not yet been carried out, but the PxM CG has already developed a methodology for doing so. The analysis will be based on Table AR 10 (Appendix A of ESRS 1) and the UNEP FI study "Sectoral Risk Briefings: Insights for Financial Institutions. Climate Risks in the Industrials Sector". Transition risks arise from the transition to a low-carbon economy and may result from a failure to align company strategy with regulatory and market changes.

Risk category:

- political and legal – new climate regulations, e.g. emission standards, carbon tariffs, energy efficiency regulations,
- market – changes in demand due to consumer preferences and RES development,



- technological – need to implement new technologies (RES, energy storage, electrification),
- reputational – pressure from stakeholders for pro-climate action.

Scenario analysis in the assessment of climate risks

The climate risk analysis was carried out using the scenario method, commonly used in assessing risks related to climate change. This method simulated different climate scenarios, taking into account both changes in long-term climate trends and possible economic, policy and technological responses.

The analysis of physical risks was carried out using climate scenarios RCP 4.5 and RCP 8.5, which represent a moderate and high greenhouse gas emission trajectory, respectively. In the analysis of transition risks, low-carbon economy transition scenarios developed by recognised international institutions, such as the IEA or NGFS, will be used. The use of different scenarios allows the resilience of the organisation’s strategy and business model to be assessed under various possible climate and climate policy development pathways.

MATERIALITY ASSESSMENT

Physical risks

In the assessment process, 28 climate hazards were included in the assessment, of which 23 were analysed for the territory of Poland. The assessment was based on data from KLIMADA 2.0 (National Institute for Environmental Protection), EFFIS (European Commission) and materials from the Polish Geological Institute (Landslide Protection System, Geoenvironmental Map of Poland).

The following tables describe the identified physical climate risks for in-house and project sites.

Transformation risks

The transition risk assessment identifies four main categories of risks: political and legal, technological, market and reputational. Potential risks in each category will be determined in relation to the objectives and directions of the ESG Strategy of the Capital Group.

A multi-criteria approach will be used to assess the materiality of risks, if the level of risk results from the relationship between:

- **probability** (expert rating on a scale of 1-5),
- **scope** (from a national plant/project to an international project on a scale of 1-5),
- **influence** on activities and achievement of strategic objectives (expert rating on a scale of 1-5).

A systemic assessment of climate risks is carried out in the PxM CG once every two years. The first such assessment was carried out in 2024, and the next is planned for 2026.

Table 16. Identified physical risks – own locations (9).

Name of risk	no risk	low risk	moderate risk	high risk	catastrophic risk
Heat stress	7	2	0	0	0
Heat wave	4	4	1	0	0
Cold wave/frost	0	4	5	0	0
Wildfire	3	1	5	0	0
Changing precipitation patterns and types (rain, hail, snow/ice)	8	1	0	0	0
Precipitation or hydrological variability	8	1	0	0	0
Water stress	0	5	4	0	0
Drought	6	2	1	0	0



Table 17. Identified physical risks – project locations (27).

Name of risk	no risk	low risk	moderate risk	high risk	catastrophic risk
Temperature changes, covering air, freshwater and seawater	26	1	0	0	0
Heat stress	23	2	2	0	0
Heat wave	23	4	0	0	0
Cold wave/frost	10	16	1	0	0
Wildfire	6	15	6	0	0
Changes in wind circulation	26	1	0	0	0
Storm, including snowstorms, dust storms and sandstorms	24	3	0	0	0
Changing precipitation patterns and types (rain, hail, snow/ice)	26	1	0	0	0
Precipitation or hydrological variability	20	7	0	0	0
Water stress	20	5	2	0	0
Drought	21	4	2	0	0
Heavy precipitation (rain, hail, snow/ice)	20	2	5	0	0
Flood (coastal, fluvial, pluvial, ground water)	26	1	0	0	0
Soil degradation	24	1	0	0	0
Soil erosion	24	1	0	0	0

E1-2 Policies related to climate change mitigation and adaptation

As at the date of preparation of this report, the PxM CG has not implemented a separate, formalised policy related to climate change mitigation or a separate policy related to adaptation to climate change within the meaning of ESRS E1-2. Management of climate matters is currently carried out on the basis of selected internal documents and principles supporting emission reduction, energy efficiency, operational risk management and adaptation measures.

E1-3 Actions and resources in relation to climate change policies

In 2024, the PxM CG calculated greenhouse gas emissions in Scope 1, 2 and 3. In 2025, analytical and conceptual work on possible decarbonisation directions was continued. As part of these activities, a number of workshops were held with all operating companies of the Capita Group, devoted to the identification of potential reduction initiatives. In the next steps, their decarbonisation value and the estimated costs necessary for their launch and implementation were assessed. Ultimately, they were included in the matrix of decarbonisation activities, which will form the basis for preparing and adopting the Transition Plan. As at the balance sheet date, the Transition Plan for climate change mitigation had not yet been formally adopted. The PxM CG continues preparatory and analytical work on determining the labour intensity and capital intensity of these initiatives and agrees on initiatives that can be implemented, broken down by subsequent years. Further decisions concerning the adoption of the plan and the timetable for implementing individual initiatives will be made in subsequent periods. Regardless of the lack of formal adoption of the Transition Plan in 2025, the Capital Group identified decarbonisation activities that were implemented and may support the reduction of greenhouse gas emissions in the activities of the Capital Group. They include in particular the following areas:

- modernisation of production processes,
- increasing the share of renewable energy sources, including through the installation of photovoltaic panels combined with investments in energy efficiency aimed at reducing the impact of rising energy costs and reducing greenhouse gas emissions,



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- limiting the use of high-emission raw materials, such as steel and concrete, in projects implemented in accordance with BREEAM certification at EXCELLENT level,
- replacement of power tools taking into account a higher energy efficiency class,

The effectiveness of implementing activities in the area of climate policy depends on several key factors:

- financial resources – the need to invest in technology modernisation, e.g. purchase of energy-efficient machinery, implementation of energy management systems, development of renewable energy sources.
- availability of low-emission materials – cooperation with suppliers offering raw materials with a reduced carbon footprint, e.g. concrete, cement and steel.
- human capital – employee training and implementation of ESG competences within the company structure.
- regulation and institutional support – access to support programmes, energy transition grants and compliance with new ESG reporting regulations.

Limited resource availability (e.g. scarcity of green raw materials or high cost of new technologies) can affect the pace of implementation.

E1-4 Targets related to climate change mitigation and adaptation

Polimex Mostostal Group has taken steps to implement a **comprehensive approach to ESG matters** and adopted an **ESG Strategy** in early 2025. Targets that address climate issues are indicated below:

OBJECTIVE 1 – Striving to reach climate neutrality of the Polimex Mostostal Capital Group by 2050.

Successively reducing the carbon footprint of the Polimex Mostostal Capital Group.

Measures:

- Development of a decarbonisation strategy (reducing the carbon footprint) in the Capital Group by the end of 2025.
- Implementation and operationalisation of the decarbonisation strategy in the PxM Capital Group by the end of 2026 and in subsequent years.

Actions:

1. Introduction of modern production technologies that reduce GHG emissions:
 - Use of energy-efficient equipment and systems that optimise energy consumption,
 - Implementation of production technologies based on renewable energy, such as photovoltaics and energy storage,
 - Technological processes to minimise energy and material losses.
2. Promoting the use of low-carbon materials:
 - Cooperation with suppliers in the development and use of raw materials with a reduced carbon footprint, such as eco-friendly concrete and low-carbon steel.
 - Introducing recycled materials into production, in line with the principles of a circular economy,
 - Priority given to certified suppliers who meet international standards.

Reducing the energy consumption of the Polimex Mostostal Capital Group

Measures:

- Conducting energy audits in 2025 and introducing an additional energy management system standard ISO 50 001.
- Developing a 'green business travel' policy by the end of 2026.

Actions:

1. Further optimisation of energy consumption and use across the Group's operations.
2. Optimisation of technological processes in production facilities:



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- Analysis and modification of key technological processes to reduce energy consumption per unit of production,
 - Integration of energy management systems into production processes based on PN-EN ISO 50001 standards.
3. Increasing the proportion of energy-efficient equipment in the company:
- Investment in modern, energy-efficient equipment,
 - Gradual replacement of older equipment with energy class A+ and above, both in production processes and office infrastructure.
4. Increasing the share of energy from renewable sources:
- Promoting the use of renewable energy sources, e.g. installation of photovoltaic panels on production sites and offices,
 - Purchase of electricity under a PPA contract,
 - Purchase of guarantees of origin for the remaining volume of energy consumed.

Increasing the share of renewable energy sources in the Polimex Mostostal Group.

Measures:

- Implementation of RES investments in production facilities.
- Reduction of emissions in scope 2 resulting from the purchase of energy origin certificates.

Actions:

1. Development of photovoltaic installations on production sites:
 - Use of building roofs, car parks and other open spaces on production sites for the installation of photovoltaic panels.
 - Adaptation of plant infrastructure to use energy from RES.
2. Working with suppliers of renewable electricity:
 - Prioritising the use of energy from renewable sources, such as wind farms, hydroelectric power plants and biogas plants.
 - Conclusion of long-term contracts (PPAs – Power Purchase Agreements) with green energy suppliers to ensure stable and predictable costs.
 - Regular reporting of the share of renewable energy in the total energy consumption of the PxM CG.

E1-5 Energy consumption and mix

Energy consumption in the organisation

The PxM CG conducts ongoing monitoring of energy consumption in the organisation, i.e. in the Capital Group companies, broken down by main energy carriers and organisational units, in order to identify areas of the highest energy intensity and plan optimisation activities. Electricity is used primarily in technological processes and to power machines and equipment, as well as for auxiliary infrastructure, including lighting of halls and sites, offices and social rooms. Heat is used mainly for heating facilities, i.e. office and social rooms and production halls, and maintaining the required environmental parameters in selected processes. Energy consumption is analysed periodically and comparatively, which forms the basis for setting priorities for actions improving energy efficiency and planning investment initiatives in the companies covered by monitoring, i.e. MS, NN, ST, IL, EMPB, PxB, PxE, Pxl, PxM, PxO.

The energy mix of the PxM CG includes energy obtained from several sources: energy purchased from external suppliers, i.e. electricity and heat, energy generated from fuels for own needs, and energy produced in own installations, including renewable sources and the CHP cogeneration unit. The structure of the energy mix is analysed periodically in order to increase the share of low- and zero-emission sources, improve security of supply and reduce sensitivity to fluctuations in energy prices.

Table 18 presents a summary of all energy sources together with the amount of energy obtained from these sources.



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Table 18. Polimex Mostostal Capital Group's energy mix in 2025.

Energy consumption and mix	Energy consumption [MWh] 2024	Energy consumption [MWh] 2025
Fuel consumption from coal and coal products	-	-
Fuel consumption from crude oil and petroleum products	20,059.56	19,197.42
Fuel consumption from natural gas	48,183.91	54,781.05
Fuel consumption from other fossil sources	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources	35,059.62	34,953.65
Total energy consumption from fossil sources, (calculated as the sum of rows 1-5)	103,303.09	108,932.12
Energy consumption from nuclear sources	-	-
Fuel consumption from renewable sources, including biomass, also covering industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources	5,243.03	5,659.36
Consumption of self-generated renewable energy produced without fuel use	1,961.93	8,157.05
Total consumption of renewable and low-emission energy (calculated as the sum of rows 7-10)	7,204.96	13,816.41
Total energy consumption (calculated as the sum of rows 6, 7 and 11)	110,508.05	122,748.53
% of energy from fossil sources	93.48%	88.74%
% of energy from nuclear sources	0.00%	0.00%
% of energy from renewable sources	6.52%	11.26%

The values shown in the table above have been calculated on the basis of the balance sheet calculations carried out, which are used for internal settlements and accounting records based on purchase documents.

Energy management

The PxM CG manages energy through measurement, recording and analysis of energy consumption broken down by companies, carriers and key areas of consumption. Energy management is based on periodic reviews of energy data, identification of areas with the highest energy intensity, and preparation and implementation of improvement measures, both organisational and investment-related, aimed at improving the efficiency of energy use and reducing cost and operational risks.

In 2025, the PxM CG purchased electricity from external sellers, with this energy not being contracted as coming entirely from renewable sources. In order to increase the share of renewable energy in the PxM CG's energy balance, the Group also purchased guarantees of origin confirming the production of part of the electricity from renewable energy sources.

Since 2025, the PxM CG has been strengthening its approach towards more effective energy management by analysing the possibility of directing future contracts towards the supply of energy from renewable sources, as well as solutions enabling confirmation of the share of renewable energy in consumption under some existing agreements. At the same time, the PxM CG uses its own generation sources, thanks to which part of the demand for electricity is covered by RES installations and the CHP cogeneration unit. In subsequent periods, the PxM CG is analysing the possibility of further development of its own generation sources in selected locations and a potential increase in the share of renewable energy in the energy balance.

In 2025, the PxM CG began preparations for the implementation of solutions compliant with ISO 50001. The activities included, among others, energy audits, a review of current practices, identification of areas to be standardised and conceptual work on the energy policy of the Capital Group. The results of these works will form the basis for decisions on the directions of development of the energy management system in subsequent years.



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E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions

The Polimex Mostostal Capital Group carried out a greenhouse gas inventory for 2025, covering scopes 1, 2 and 3. The greenhouse gas emissions inventory was carried out in accordance with the principles of the GHG Protocol Corporate Accounting and Reporting Standard, which includes organisation-level specifications and guidance for the quantitative determination and reporting of greenhouse gas emissions and their reductions. The GHG Protocol methodology covers six greenhouse gases covered by the Kyoto Protocol: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) [1] and sulphur hexafluoride (SF₆).

Organisational boundaries

Table 19. Entities covered by the greenhouse gas inventory (subsidiaries).

Item	Entity	Registered office	Scope of business activity	% of shares	Registered office
1	Polimex Mostostal S.A.	Warsaw	parent company		YES
2	Polimex Energetyka sp. z o.o.	Warsaw	Construction works	100	YES
3	Naftoremont-Naftobudowa sp. z o.o.	Płock	Construction works	100	YES
4	Polimex Opole sp. z o.o. sp. k.	Warsaw	Construction works	100	NO
5	Mostostal Siedlce sp. z o.o.	Siedlce	Manufacturing of metal products	100	YES
6	Stalfa sp. z o.o.	Sokołów Podlaski	Manufacturing of metal products	100	YES
7	Polimex-Mostostal ZUT sp. z o.o.	Siedlce	Technical services	100	YES
8	Czerwonogradzki Zakład Konstrukcji Stalowych sp. d. o.	Czerwonograd Ukraina	Production of metal structures	100	NO
9	Polimex Budownictwo 1 sp. z o.o.	Siedlce	Industrial construction	100	YES
10	Polimex Budownictwo sp. z o.o.	Siedlce	Industrial construction	100	NO
11	Polimex Operator sp. z o.o.	Warsaw	Rental and leasing services of construction machinery and equipment	100	YES
12	Polimex Infrastruktura sp. z o.o.	Warsaw	Construction works on roads and highways	100	YES
13	Instal Lublin S.A.	Lublin	Specialised construction services	100	YES
14	Energomontaż-Północ Bełchatów S.A.	Rogowiec	Specialised construction and assembly services	99.65	Yes (100%)

Czerwonogradzki Zakład Konstrukcji Stalowych sp. d. o. was not included due to the lack of access to reliable data in connection with the ongoing armed conflict there. Other companies not included in the report (4, 10) were not included due to the absence of operating activities in 2025.



Operational limits

The GHG inventory covers the following ranges and categories of GHG emissions as defined in the GHG Protocol:

- **Scope 1**
Direct GHG emissions: GHG emissions from fuel combustion in stationary installations, mobile installations (vehicle fleet and mobile devices) and process emissions.
- **Scope 2**
Indirect energy-related emissions, include GHG emissions from purchased electricity, heat. The CG did not purchase cooling power.
- **Scope 3**
Indirect emissions, (not covered by scope 1 and 2), occurring in the value chain of the reporting enterprise, include emissions both upstream and downstream in the supply chain.

As a result of the analysis of upstream and downstream activities in the value chain, the following scope 3 categories were deemed material:

- Category 1: Emissions from purchased products and services.
- Category 2: Extraction, production and transport of capital goods purchased or acquired by the reporting company in the reporting year.
- Category 3: Fuel- and energy-related activities, not included in scope 1 and 2.
- Category 4: Upstream transport and distribution.
- Category 5: Waste generated – emissions associated with waste generation.
- Category 6: Domestic and international business travel. Emissions from business travel by company cars were included in fuel consumption in scope 1 in order to avoid double counting of emissions.
- Category 7: Emissions resulting from employees commuting to work.
- Category 8: Assets leased upstream in the value chain.
- Downstream categories 9–12 were subjected to a materiality analysis in accordance with the GHG Protocol. Due to the project-based nature of the Capital Group's activities, the lack of operational control over further transport, processing and operation of transferred installations, and the lack of access to reliable data enabling a quantitative estimate of emissions, these categories were deemed immaterial from the point of view of scope 3 emissions calculation. In connection with the above, the Capital Group does not report emissions quantitatively in these categories, while maintaining descriptive disclosure.
- Categories 13-15: excluded due to the absence of this type of activity in the PxM CG.

For the 2025 calculations, the 2022 USD exchange rate was adopted (<https://nbp.pl/archiwum-kursow/tabela-nr-252-a-nbp-2022-z-dnia-2022-12-30/>), as well as consumer price indices published by Statistics Poland: 2022/2023 (11.40%), 2023/2024 (3.6%) and 2024/2025 (3.6%), and the kgCO₂/USD2022 indicator. The calculation methodology is described in detail in the "Procedure for reporting scope 3 greenhouse gas emissions (GHG Scope 3) in the Polimex Mostostal Capital Group".



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Gross Scopes 1, 2, 3 and Total GHG emissions

Table 20. Greenhouse gas emissions at Polimex Mostostal Group.

Scope	Year 2024 [Mg CO ₂ e]	Year 2025 [Mg CO ₂ e]
Scope 1 GHG emissions		
Scope 1	15,072.33	15,988.27
Share of Scope 1 GHG emissions from the regulated emissions trading system	0.00	0.00
Scope 2 GHG emissions		
Gross scope 2 greenhouse gas emissions according to the Location-based method	18,715.11	19,663.85
Gross scope 2 greenhouse gas emissions according to the Market-based method ^C	21,297.07	12,243.97
Significant Scope 3 GHG emissions		
Total gross indirect Scope 3 GHG emissions	72,646,176.58 ^D	135,698.61
Category 1 – Purchased goods and services	105,228.02	119,745.65
Category 2 – Capital goods	620.03	496.27
Category 3 – Fuel and energy-related activities not included in Scope 1 or Scope 2	3,668.21	3,486.25
Category 4 – Upstream transport and distribution	3,057.95 ^D	3,521.05
Category 5 – Waste generated in operations	1,078.24	1,033.39
Category 6 – Business travelling	79.80	79.86
Category 7 – Employee commuting	4,658.54	4,720.15
Category 8 – Upstream leased assets	2,403.44	2,615.99
Category 9 – Downstream transport and distribution	-	-A
Category 10 Processing of sold products	-	-A
Category 11 – Use of sold products	72,525,382.35	-A
Category 12 – End-of-life treatment of sold products	excluded	-A
Category 13 Downstream leased assets	-	-B
Category 14 Franchises	not applicable	-B
Category 15 Investments	not applicable	-B
Total greenhouse gas emissions		
Total greenhouse gas emissions in scopes 1 + 2 (location-based)	33,787.44	35,652.12
Total greenhouse gas emissions in scopes 1 + 2 (Market-based)	36,369.40	28,232.24
Total greenhouse gas emissions in scopes 1 + 2 (Location-based) + 3	72,679,964.02	171,350.73
Total greenhouse gas emissions in scopes 1 + 2 (market-based) + 3	72,682,545.98	163,930.85

In the course of work on scope 3, categories 9, 10, 11 and 12, it was found that products are delivered by the reporting entity directly to the construction or installation site and, as a rule, do not require further transport downstream in the value chain. Due to the project-based nature of the Capital Group's activities, the lack of control over further logistics, use and dismantling after the end of the life cycle following the transfer of products or facilities to the customer, and limited data availability, these categories were deemed not relevant from the point of view of quantitative calculation. TEmissions were disclosed descriptively.

^B In the course of work on Scope 3 (cat. 13–15) it was found that there was no activity in this area.

^C Due to the fact that electricity suppliers are not required to provide each individual customer with information on an individual energy mix, the average energy mix published by each supplier was applied in the Market-Based method, without considering the PPA contracts offered by them.

^D Values corrected in connection with a Change in indicators for freight transport in category 4.



Table 21. Emission intensity in the PxM CG in scope 1 and 2

	Emission volume [Mg CO ₂].		Revenue volume [PLN million]		Emission intensity [kg CO ₂ / million]	
	2025	2024	2025	2024	2025	2024
Scope 1	15,988.27	15,072.33	4,130.49	2,855.89	3.87	5.24
Scope 2 (L-B)	19,663.85	18,715.11	4,130.49	2,855.89	4.76	6.51
Scope 1 and scope 2 combined	35,652.12	33,787.44	4,130.49	2,855.89	8.63	11.75

The PxM CG has not defined quantitative targets for reducing the emission intensity of its activities.

Carbon footprint calculation – improving calculation accuracy

Acting in accordance with the Sustainable Development Policy and growing requirements concerning environmental reporting, the PxM CG asked Contractors supplying key materials to the PxM CG, namely concrete, cement, steel and aluminium, to provide information on the Carbon Footprint of the products they offer. Unfortunately, the number of enterprises ready to provide such data is still too small to allow a transition from spend-based indicators to activity-based indicators. Educational activities in this area will continue in subsequent years in order to move over time to more accurate activity-based indicators.

E1-7 GHG removals and GHG mitigation projects financed through carbon credits

In 2025, the PxM CG did not purchase offset units or Carbon Credits.

E1-8 Internal carbon pricing

In 2025, the PxM CG did not set an internal unit price for greenhouse gas emissions that would be used in processes for managing impacts related to climate change.

ESRS E2 – POLLUTION

IRO-1 – Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

The process of identifying and assessing material impacts, risks and opportunities related to pollution forms part of the general process of updating the double materiality assessment. As part of this analysis, signals are collected and consultations are conducted during working contacts with individual Stakeholders.

The PxM CG identifies pollution-related risks and impacts by analysing the locations of projects, plants and construction sites based on environmental documentation and compliance reviews. Suppliers are assessed on the basis of contractual requirements and questionnaires.

As part of the double materiality assessment process, two material impacts related to pollution were identified:

- deterioration of environmental quality and human health as a result of emissions to air, water and soil. (negative, actual impact)
- modernisation of technological processes may contribute to reducing environmental impact and factors affecting human health, a positive, potential impact.

The activity of Polimex Mostostal Capital Group in the production and construction sector generates emissions of pollutants into the air, water and soil, which affects the quality of the environment, especially in the direct vicinity of the investments and production facilities under construction. Processes such as welding, corrosion protection (painting, galvanising) and the combustion of fuels in internal combustion engines contribute to emissions of carbon oxides (CO), nitrogen oxides (NOx), sulphur oxides (SOx), particulate matter (PM10) and organic compounds (NMVOC), among others. Additional sources of environmental pressure are industrial wastewater and waste resulting from the technological processes carried out.



E2-1 Policies related to pollution

PxM CG's pollution-related policies, procedures and processes:

- PxM CG Policy concerning quality, health protection, the environment and occupational health and safety;
- Environmental Management (process);
- Environmental Monitoring (procedure);
- Identification and assessment of environmental aspects and assessment of compliance with legal requirements (procedure);
- Waste management in the PxM CG (instruction);
- Performing the work with respect for the environment (instruction);
- General conditions for the execution of works on the premises of PxM and the PxM CG Companies regarding compliance with environmental regulations (instruction);
- Environmental protection programme for the PxM CG (plan);

In addition to the system documents, the PxM CG is governed by national laws, among others:

- Environmental Protection Law;
- Waste Act;
- Act on Packaging and Packaging Waste Management;
- Act on Waste Electrical and Electronic Equipment;
- Act on Collective Water Supply and Collective Sewage Disposal;
- Energy Efficiency Act;
- Regulation on emission standards for certain types of installations, fuel combustion sources and waste incineration or co-incineration equipment;
- Regulation on requirements for the measurement of emissions;
- Regulation on unit rates of environmental charges;
- Regulation on the types of installations that may cause significant pollution of individual natural elements or the environment as a whole;
- Regulation laying down harmonised conditions for the marketing of construction products.

As part of its activities, the PxM CG prepares the following pollution-related reports and statements:

- Report to the National Database on Greenhouse Gas Emissions and Other Substances Emissions KOBiZE (in accordance with Article 7 section 1 of the Act of 17 July 2009 on the system for managing greenhouse gas emissions and other substances (Journal of Laws 2022.673)),
- A list containing a summary of information on the scope of environmental use and the amount of fees due (in accordance with Article 286 of the Act of 27 April 2001 Environmental Protection Law (Journal of Laws 2021.1973)),
- Reports to the Central Statistical Office (CSO),
- Reports to the Database on Products and Packaging and Waste Management (BDO),
- Reports to the Państwowe Gospodarstwo Wodne Wody Polskie (State Water Holding "Polish Waters"),
- Reports to the Provincial Inspectorate for Environmental Protection.

As at the date of preparation of the Sustainability Statement, the Polimex Mostostal Capital Group did not have a separate, dedicated policy comprehensively regulating the management of material impacts, risks and opportunities related to pollution. Nevertheless, the Polimex Mostostal Capital Group has measures in place aimed at limiting the negative effects of air, water and soil pollution, including in particular requirements concerning emission control, proper management of chemicals and waste, and the use of preventive measures during the performance of construction and industrial works. These principles are implemented on the basis of applicable environmental protection laws, issued administrative decisions and internal regulations. The Polimex Mostostal Capital Group is considering developing a dedicated policy in this area in the future.



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The environmental and OHS management process describes actions preventing incidents and emergencies, including response, minimising effects on people and the environment, and reporting in accordance with applicable laws. Emergency response instructions, technical safeguards and employee training are applied on construction sites and in plants, which makes it possible to limit the risk of occurrence of events and their potential impact.

E2-2 Actions and resources related to pollution

The PxM CG, operating in the production and construction sector, manages the impact of its activities on the environment in accordance with applicable laws, administrative requirements and the functioning environmental management system. The actions of the Capital Group in the area of pollution, in accordance with the law, include both preventing pollution at source, limiting its scale and undertaking remedial and protective actions in the case of environmental impacts related to the conducted activities.

As part of actions aimed at avoiding pollution, the PxM CG uses materials and substances with a limited negative impact on the environment and gradually withdraws particularly toxic and carcinogenic substances used, among others, in anti-corrosion processes. The Capital Group also designs production and transport processes in a manner limiting the generation of emissions and waste at source and implements material and technological solutions with lower emissions.

In the area of pollution reduction, the PxM CG conducts environmental monitoring, covering in particular gas and dust emissions and wastewater quality, in accordance with requirements arising from water permits and environmental permits. As part of regulatory obligations, the Capital Group reports data concerning emission volumes and fees for the use of the environment to the Marshal's Offices.

In the area of restoration, regeneration and control of impacts, projects under implementation are subject to environmental supervision covering waste management, land development and construction site facilities management. The PxM CG also cooperates with specialised external entities in the area of nature supervision at the preparation and implementation stage of investments. In the event of environmental damage or the need to fulfil obligations arising from administrative decisions, the Capital Group undertakes remedial and restoration actions, including reclamation, removal of the effects of incidents and restoration of environmental elements.

The implementation of the above actions is supported by the organisational, technical and operational resources of the Capital Group, including technological solutions limiting environmental impact, resources used for environmental monitoring and supervision, and support from specialised external entities. The production plants of the PxM CG are obliged to maintain a certified environmental management system compliant with ISO 14001, the compliance of which is regularly verified as part of audits conducted by independent certification bodies. In addition, some companies forming part of the Capital Group operate on the basis of their own separate environmental management systems, also certified, adapted to the specific nature of their activities. The Capital Group also takes environmental requirements into account when designing, expanding and modernising production infrastructure, treating investments in modern technologies as an important element of actions to reduce pollution and improve environmental efficiency.

Environmental monitoring

At PxM CG, the environmental management process is a system that complies with the requirements of EN ISO 14001:2015. As part of basic system activities and in accordance with applicable legal regulations, environmental monitoring is carried out, including control of emissions into the atmosphere, waste registration, control of the waste disposal process, recovery and monitoring of wastewater discharge.

Environmental monitoring carried out at Polimex Mostostal Group, includes:

- air emissions,
- pollutant emissions in wastewater,
- noise emissions,
- waste emissions,
- groundwater withdrawals from own intakes,
- energy and water consumption,
- consumption of raw materials and other materials.

The scope of monitoring is defined in environmental regulations and decisions.



Air monitoring

Performing periodic measurements of air pollutant emissions in accordance with administrative decisions issued for specific locations. Air monitoring is mandatory for organisational units of the Polimex Mostostal Capital Group for which administrative decisions (air emission permits, integrated permits) specify a monitoring obligation.

Monitoring of wastewater discharge

Periodic measurements of pollutant concentrations in industrial wastewater and rainwater discharged into surface waters.

Wastewater monitoring is carried out by a laboratory at production plants in the following areas:

- determination of zinc,
- determination of total phosphorus,
- determination of chlorides,
- pH measurement,
- determination of COD (chemical oxygen demand),
- total suspended solids.

Wastewater testing for the determination of petroleum substances is carried out by external laboratories accredited to the required extent.

Waste monitoring

The rules for handling waste generated in the Polimex Mostostal Capital Group are included in the waste management instruction. Waste monitoring includes, but is not limited to:

- keeping records of waste based on the waste transfer note in the BDO system,
- checking the quantities of waste produced against the quantities specified in administrative decisions (integrated permit, waste production permit),
- compiling summary data on the types and quantities of waste generated and submitting them to the Health, Safety and Environment Office.

Hazardous substances

In accordance with the Environmental Management process in the Integrated Management System, hereinafter: IMS, all hazardous substances and preparations used at workplaces should have a hazardous substance safety data sheet. Hazardous substances and preparations are stored on the premises of the Companies of the Polimex Mostostal Capital Group in accordance with the guidelines contained in the safety data sheet. Substances that are particularly hazardous to the environment are marked with an appropriate pictogram. All substances used and stored on the premises of the Polimex Mostostal Capital Group's organisational units are entered in the Register of Hazardous Substances.

The PxM CG includes pollution prevention activities in the value chain, requiring subcontractors to comply with environmental regulations, properly handle waste and safely manage chemicals. Compliance is verified through contractual requirements and supplier declarations, which makes it possible to limit risks.

E2-3 Targets related to pollution

As part of the Integrated Management System, which covers most organisational units of the Polimex Mostostal Capital Group, an Environmental Management process has been introduced in accordance with PN-EN ISO 14001:2015, the objective of which is to strive for continuous improvement of environmental protection activities and minimise the costs of the organisation's functioning.

The scope of the process includes a course of action from the identification of legal and other requirements, the identification and supervision of environmental aspects through monitoring, measurement and periodic review.

Once a year, as part of a review by the Management Board, an assessment is made of the achievement of the objectives and the functioning of the IMS processes, which constitute the so-called baseline data relating, among other things, to the assessment of the achievement of the objectives for the previous year.



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Process performance targets and measures include, but are not limited to, the following (these are voluntary targets that are not driven by imposed obligations):

- Amount of environmental fees [PLN thousand] / sales revenue [PLN million],
- Amount of waste generated [Mg] / sales revenue [PLN million].

The area of emissions to water was assessed as immaterial, and therefore no separate targets were established concerning the prevention and control of pollutant loads introduced into water. As part of the environmental management system, general objectives and actions aimed at minimising environmental impact are implemented; however, they do not include specific targets concerning emissions to water due to the absence of such risk in the activities of the Capital Group.

The area of soil pollution was assessed as immaterial, and therefore no other targets were established concerning the prevention and control of soil pollutant loads. As part of the functioning management system, objectives and actions are implemented to minimise the risk of pollution, including that related to hazardous substance management and land use; however, they do not include soil targets due to the low significance of this risk.

The area of management of substances of concern and substances of very high concern was assessed as immaterial, and therefore no targets were defined for this scope.

As part of ISO 14001 requirements, general objectives and actions relating to chemical substance management and minimising the risk of their improper use are implemented; however, no targets related to this area were established due to its low significance.

E2-4 Pollution of air, water and soil

Table 22. PxM CG air, water and soil pollution in 2025.

Substance	Entity	2025	2024
Carbon monoxide (CO)	kg	7,048.74	5,833.35
Non-methane volatile organic compounds (NMVOCs)	kg	84,846.35	30,080.34
Nitrogen oxides (NO _x /NO ₂)	kg	9,166.78	9,126.56
Sulphur oxides (SO _x /SO ₂)	kg	143.49	141.80
Polycyclic aromatic hydrocarbons (PAHs)	kg	10,336.66	16,231.06
Particulate matter (PM ₁₀)	kg	17,885.54	11,393.73

* In 2025, as part of the reporting and recording processes for environmental events functioning in the Group, no cases of water or soil pollution requiring notification were recorded. The Capital Group is currently developing an approach to further strengthening the identification and assessment of such events.

Contaminants within the above compounds arise as a result of technological processes including welding, corrosion protection of structures and components during galvanising and painting, among others.

The data was taken from an inventory containing information on the types and volumes of emissions and gases or dust introduced into the air generated in the Atmoterm / Ekostrateg programmes.

The PxM CG reports information on pollution broken down by location/plant or projects, according to the type of source, i.e. process/installation/transport. For air, NO_x, SO₂ and dust are reported, resulting from measurements or calculations in accordance with environmental decisions; for water and soil, disclosures are limited to information required by regulations and decisions.

The Capital Group reports emissions of substances only to air, in accordance with the requirements of environmental decisions and applicable laws. In 2025, no emissions of pollutants to soil or events that could result in such pollution were recorded.

In 2025, no emissions of pollutants to water were recorded, and the processes conducted do not create a material risk of their occurrence. Similarly, in 2025 there were no emissions of pollutants to soil or incidents that could cause such an impact.

In the analysed period, no material changes were recorded in the area of air, water or soil pollution. Air emissions resulted mainly from the operation of installations covered by environmental decisions and from fugitive emissions on projects under implementation; there were no emissions to water or soil, or events that could cause such pollution.



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Measurements of pollutant emissions to air are carried out in accordance with the requirements of environmental decisions and applicable standards. In the case of water in the galvanising plant installation, monthly monitoring of rainwater and post-process water parameters is carried out by a laboratory, in accordance with regulatory requirements and the permit.

Pollution data are collected on the basis of measurements required by environmental decisions and legal provisions. Air emissions are reported on the basis of periodic measurement results. In the case of the galvanising plant installation, data on water quality are obtained monthly on the basis of tests performed by a laboratory. Information on the absence of emissions to soil results from ongoing supervision and control; all data are consolidated for reporting purposes.

E2-5 Substances of concern and substances of very high concern

In 2025, the CG recorded no contact with substances on the lists of substances of concern and substances of very high concern.

ESRS E3 WATER AND MARINE RESOURCES

IRO-1 – Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

The double materiality assessment process identified one significant impact related to ESRS E3:

- Water consumption, including in water-deficit areas, (negative, actual)

Polimex Mostostal Group's activities have a local impact on water resources, particularly in the context of groundwater withdrawals and wastewater discharge from industrial and service processes. PxM CG 's production facilities and infrastructure projects require the consumption of significant amounts of water, mainly for technological processes such as cooling in the hot-dip galvanising plant.

E3-1 Policies related to water and marine resources

As at the date of preparation of this report, the PxM CG has not yet implemented a separate, formalised policy concerning the use and acquisition of water and marine resources, prevention and reduction of water pollution, or a separate policy for activities conducted in areas affected by a high level of water scarcity. In the area of water management, the PxM CG currently operates on the basis of applicable laws, the terms of administrative decisions, including water permits, and internal procedures for monitoring water abstraction and consumption. These procedures include in particular measurement and recording of water abstraction from own intakes and monitoring of water consumption in organisational units of the Capital Group. These solutions do not yet constitute a separate policy within the meaning of ESRS E3-1.

As at the date of preparation of this report, activities conducted in areas of high water stress are not yet covered by a separate water policy; this results from the early stage of building the management system for this area. The PxM CG plans to supplement this element as part of work on the water policy.

In the area of marine resources, the PxM CG has not implemented separate policies or practices, as this area is not material to the business model of the Capital Group.

E3-2 Actions and resources related to water and marine resources

As at the date of preparation of this report, the activities of the PxM CG in the area of water focus primarily on monitoring water abstraction and consumption, ensuring compliance with administrative and legal requirements, and reducing the risk of water pollution within operating activities. Water consumption is systematically monitored, with particular consideration given to the quantity of water abstracted from surface and groundwater sources and the use of water in production processes. A significant part of water resources is used for technological processes, including cooling processes.

The production companies of the PxM CG hold the required administrative decisions, including water permits concerning groundwater abstraction from own intakes and, where applicable, wastewater discharge. As part of ongoing operating activities, compliance with the terms of these decisions is monitored, including operational checks and records of activities related to water and wastewater management.



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These activities are currently primarily operational and compliance-oriented in nature. As at the date of preparation of this report, the PxM CG has not yet separated a dedicated action programme or dedicated financial resources focused exclusively on reducing water consumption, increasing recovery and reuse of water, or activities for areas exposed to significant water-related risk. The Capital Group does not currently conduct specific activities dedicated to areas with high water scarcity; the need to implement such activities will be assessed in subsequent reporting periods based on the development of the process for identifying water-related risks and impacts.

In the area of marine resources, as at the date of preparation of the report, the PxM CG has not identified separate actions requiring disclosure under E3-2.

E3-3 Targets related to water and marine resources

As part of the Integrated Management System, the Environmental Management process operates in compliance with the requirements of PN-EN ISO 14001:2015, aiming at continuous improvement of environmental protection activities and increasing the cost efficiency of the organisation's functioning.

Once a year, as part of the IMS review by the Management Board of the PxM CG, the Management Board assesses the achievement of objectives and the functioning of processes in the IMS.

As part of the process, performance indicators and monitoring parameters are taken into account, including:

- Water consumption from own intakes / sales revenue [PLN million].

E3-4 Water consumption

For the use of its own intakes, the Capital Group pays fixed fees and quarterly variable fees for water abstraction from these intakes to the State Water Holding Polish Waters. In addition, the organisation uses water for social and domestic purposes from mains water supply. Consumption data and calculations have been established on the basis of purchase invoices and meter readings and estimates.

Clarification on the use of estimates in calculating water use and discharges in construction projects

In some construction projects of the Capital Group, where obtaining complete water consumption data was difficult, estimates were applied in accordance with the ESRS guidelines. This was due to several factors: water came from different sources (water mains, transported deliveries), there was a lack of a uniform record-keeping system at construction sites, and billing was often done on a flat rate basis without detailed invoices. In addition, the demand for water varied according to the stage of construction, and in some cases there was a lack of standard points of withdrawal. In such situations, estimates were based on available data, e.g. average consumption per employee or previous projects, which is in line with the approach allowed by the ESRS.

Table 23. PxM CG water consumption in 2025.

PxM CG water consumption	[m3]	[m3]
	2025	2024
Total water consumption	159,881.22	154,802.67
Total water consumption in areas at water risk, including areas of high-water stress	27,706.96	15,898.70
Total amount of water recycled and reused.	964.60	206.00
Total amount of water stored	1,130.00	0.00
Changes in water storage	1,130.00	0.00

Water consumption intensity

Table 24. Intensity of water consumption in the PxM CG in 2025.

	Entity	2025	2024
		Total water consumption as part of own operations	m3 / EUR million
Total net revenue	EUR million	974.8	663.5



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*As a result of analyses, an incorrect value for converting the water consumption intensity indicator in 2024 was identified; this indicator was corrected by conversion into EUR million.

Water discharges

Pursuant to a decision of the Nizański Starost, the Company from the PxM Capital Group obtained a water permit for the discharge of sewage, rainwater and meltwater into the Rudnia River from its plant in Rudnik nad Sanem. On the basis of the issued decision specifying permissible values of pollution indicators, the Company carries out operational reviews twice a year and systematically records activities related to the discharge of waters covered by the water permit. Applications, measurements and records are made in accordance with the terms contained in the Act of 20 July 2017 Water Law (Journal of Laws of 2025, item 960), which currently regulates the principles for introducing wastewater into waters or into the ground, in particular with respect to permissible quantities and quality of discharges and measurement and recording obligations arising from the permit. Commissioned analyses and tests of wastewater showed that rainwater discharged from the plant area into the Rudnia River meets the applicable requirements specified on the basis of the Water Law provisions, including wastewater quality parameters and indicators of substances particularly harmful to the aquatic environment set out in the water permit decision. In connection with compliance with the terms of the water permit and applicable regulations, in the analysed period no penalties or sanctions were imposed on the Company for exceeding permissible pollution values or breaching operational conditions specified in the water permit.

Wastewater discharge

Apart from direct discharges of water into surface waters, the PxM CG discharges domestic and industrial wastewater to local treatment plants.

The amount of wastewater discharged was calculated on the basis of accounting data from settlement invoices and estimates, see the explanation above. All wastewater discharged by the Group is classified as domestic sewage or rainwater and is discharged into the sewerage system as a result of production and service activities.

Due to the specific nature of its anticorrosion protection operations, Mostostal Siedlce sp. z o.o. has an integrated permit and a decision concerning the discharge of a mixture of industrial and domestic wastewater containing substances particularly harmful to the aquatic environment, generated in the area of the hot-dip galvanising plant (within the IPPC installation). Surveillance of the galvanising process includes daily laboratory tests carried out by the company's in-house laboratory and monthly analyses carried out by an accredited external laboratory. Both internal and external inspections have not revealed any environmental irregularities. All activities are carried out in accordance with current legislation and standards, taking into account environmental decisions and permits issued.

Table 25. Wastewater in the PxM CG in 2025.

PxM CG	Volume [m ³]	
	2025	2024
Wastewater	166,561.91	189,251.58

ESRS E4 BIODIVERSITY AND ECOSYSTEMS

E4-1 Transition plan and consideration of biodiversity and ecosystems in strategy and business model

As at the date of preparation of this report, the PxM CG has not developed a separate transition plan for biodiversity and ecosystems. At the current stage, issues related to biodiversity and ecosystems are taken into account primarily as part of compliance with applicable laws, administrative decisions, environmental documentation and contractual conditions applicable to individual projects. These issues have not been included in the form of a separate plan.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

With regard to the stationary operations of the PxM CG, the topic of biodiversity and ecosystems was not identified as relevant, as the operations carried out at headquarters and fixed locations do not involve direct impacts on areas of high natural value. In the case of project activities, environmental protection requirements,



including biodiversity and ecosystems, are determined primarily in administrative decisions, project documentation and contractual conditions. This does not exclude the obligation of the PxM CG to take environmental requirements and protective measures into account during the performance of works. At the end of the reporting period, the PxM CG had not completed work on a group-wide list of material locations, including the classification of locations according to their ecological status and their links with areas sensitive in terms of biodiversity. In connection with the change in the structure of the project portfolio and changing market conditions, the scope and nature of material impacts, risks and opportunities may be modified and require regular verification. The process of identifying and assessing these matters is continuous and will be subject to further analysis and updating in subsequent reporting periods.

IRO-1 Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities

As part of the double materiality assessment process, the PxM CG identifies and assesses impacts, risks, dependencies and opportunities related to biodiversity and ecosystems in relation to its own activities and project activities.

The location-specific nature of implemented projects and their potential impact on the natural environment are considered in the assessment process. The assessment is more developed in relation to potential impacts of project activities than in relation to a full assessment of dependencies, risks and opportunities across the entire value chain.

As a result of the analysis, the following were identified as material in particular:

- land conversion and impact on biodiversity through infrastructure investments (negative, actual)
- restoring the ecological value of land through the implementation of post-development reclamation programmes. (positive, actual)
- reducing degradation of natural habitats by integrating environmental analysis into project planning (positive, actual)

The process of identifying and assessing biodiversity-related dependencies, physical risks, transition risks and systemic risks remains under further development.

E4-2 Policies related to biodiversity and ecosystems

As at the date of preparation of this report, the Polimex Mostostal Capital Group did not have separate, dedicated internal regulations relating to the management of impacts on biodiversity [2] and ecosystems within the meaning of the requirements of ESRS E42. The management of these aspects is currently carried out indirectly, through the application of applicable laws, conditions specified in administrative decisions in the field of environmental protection, requirements arising from project documentation and contractual provisions applicable to individual projects. The Capital Group does not currently have an integrated internal regulation that would comprehensively define the approach to material impacts, risks, dependencies and opportunities related to biodiversity and ecosystems. The development and formal implementation of a dedicated internal regulation in this area remains under analysis and is planned for implementation in subsequent years, in connection with the further development of the environmental management system in the Capital Group.

E4-3 Actions and resources related to biodiversity and ecosystems

As at the date of preparation of this disclosure, the PxM CG carries out actions for biodiversity and ecosystems mainly as part of requirements arising from legal provisions, administrative decisions, environmental documentation and detailed contractual conditions applicable to individual projects. We carry out, among others:

- conducting or obtaining an environmental impact assessment before the commencement of an investment,
- avoiding and minimising impact on valuable habitats and protected species through appropriate management measures and changes in work organisation,
- organising works in a manner limiting impact on the natural environment,
- monitoring the presence of endangered species and applying protective measures, e.g. changing the work schedule, relocating nests, constructing ecological crossings,



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- revitalisation and restoration of habitats in cases required by the documentation of a given project,
- actions aimed at limiting impact on aquatic ecosystems, (e.g. wastewater quality control, protection against erosion, water quality monitoring),
- application of protective practices, such as avoiding disturbances in places of natural importance,
- conducting protective activities in specially protected areas under the supervision of environmental specialists.

The actions are aimed at implementing the mitigation hierarchy, i.e. avoidance, minimisation, reclamation/restoration, are conducted in accordance with environmental requirements appropriate to the investment site and are monitored by dedicated employees and external experts.

At the level of the entire Capital Group, there is not yet a separate group-wide action programme or separate financial resources dedicated exclusively to managing the impact on biodiversity – the involvement of funds and personnel takes place at the level of individual projects, adapted to their characteristics and location. Compensatory/reclamation measures are implemented if provided for in project documentation or administrative decisions. Environmental legislation and certain environmental impact standards are adhered to in terms of production. Production and product safety is ensured through the use of environmental and water protection procedures and systems. Most of PxM CG 's production facilities are located in industrial areas.

In the next few years, the Polimex Mostostal Capital Group plans to gradually expand actions aimed at protecting and restoring biodiversity as an important element of responsible conduct of infrastructure and industrial activities. As part of improvement, the development of systems for assessing and monitoring the impact of investments on local ecosystems is planned. The PxM CG intends to introduce uniform rules for nature analyses for all projects, using monitoring conducted in cooperation with nature experts, which will make it possible to better identify particularly sensitive areas, and plan works in a manner limiting interference with the environment.

The development of employees' environmental competences is also an important element of the planned actions. The Capital Group will increase the scope of training devoted to biodiversity, including the principles of conducting works in a manner minimising interference with the environment and the proper procedure in the event of identifying valuable elements of nature during implementation.

E4-4 Targets related to biodiversity and ecosystems

At the end of 2025, the PxM CG did not adopt targets related to biodiversity and ecosystems within the meaning of ESRS E4-4. No target values were set, and no geographical scope of targets was indicated. The issue of developing such targets will be considered in subsequent years together with the further development of the Capital Group's approach to identifying, assessing and managing impacts, dependencies, risks and opportunities related to biodiversity and ecosystems.

E4-5 Impact metrics related to biodiversity and ecosystems change

As at the date of preparation of this report, the PxM CG has not implemented metrics and indicators for the systematic monitoring of changes in biodiversity and ecosystems within the meaning of ESRS E4-5. Consequently, the Capital Group does not currently disclose quantitative impact metrics in this area. The development and implementation of such metrics will be considered in subsequent years together with the further development of the process for identifying, assessing and monitoring material impacts related to biodiversity and ecosystems.

ESRS E5 Circular economy

IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

The production of steel structures and the use of construction materials in engineering and construction projects are associated with high resource consumption, including steel, concrete, asphalt and aluminium, which translates into a material environmental impact. The consumption of primary raw materials, including natural aggregates and materials needed to manufacture the aforementioned products, constitutes a significant element of resource consumption in the projects carried out.



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The PxM CG identifies material impacts, risks and opportunities related to the circular economy as part of the annual process of updating the double materiality assessment. This process is described in section IRO-1.

As part of the double materiality assessment process, the following material impacts were identified:

- potential environmental pollution and an increase in greenhouse gas emissions in the event of a lack of segregation and improper waste management,
- reduction of resource consumption and emissions through recycling and reuse of materials.

Waste management remains a key risk area – improper management of segregation and disposal may lead to environmental pollution and increased greenhouse gas emissions, and consequently to financial and regulatory risks, such as waste disposal fees or the possibility of administrative penalties being imposed.

The transition towards a circular economy may also involve operational and cost risks in the supply chain, resulting, among other things, from the need to reorganise logistics and production processes. In addition, the availability of secondary raw materials with the required quality parameters may be limited, which affects procurement planning and project implementation schedules. Technological risk related to adapting new or modified materials to construction standards may also affect the course of projects.

At the same time, activities related to the transition towards a circular economy generate business opportunities related to effective resource management and increasing the share of secondary raw materials. They may support the building of competitive advantage and strengthen the position of the PxM CG in tenders in which environmental criteria play a significant role.

In this report, the identification of material impacts, risks and opportunities, as well as the data presented, relate only to companies within the Capital Group and do not cover activities undertaken by subcontractors. In the future, it is planned to collect this data from subcontractors as well.

E5-1 Policies related to resource use and circular economy

The Capital Group recognised the circular economy as one of the key pillars of environmental transition, which is reflected both in the ESG Strategy for 2025–2035 and in the Circular Economy Policy (CE Policy), which were adopted in 2025.

Key assumptions:

- Striving to systematically increase the share of the CE model in the operating, project and procurement processes of the PxM CG, wherever possible.
- Covering both own operations and activities across the entire value chain.

The “Circular Economy Policy” is a framework document setting out the long-term directions of the PxM CG’s activities in the implementation and development of the circular model.

Table 26. Implementation of the PxM CG’s activities based on operational pillars

ITEM	Name of pillar	Description
1	Circular raw materials	Circular raw materials - responsible management of materials through planning orders adequately to actual demand, effective use of resources, full use of materials, minimisation of material losses, limiting waste and damage, increasing the share of secondary raw materials and materials, using durable materials and reusing materials and components.
2	Recycling and recovery	Proper segregation and classification of waste and increasing the share of recycling and recovery through conscious directing of waste to processes enabling its reuse.
3	Sharing or rental	Effective use of machinery, equipment and infrastructure, limiting unjustified purchases.
4	Education and awareness change	Training and internal communication, building responsible employee attitudes.
5	Optimisation of machine use and effective logistics	Increasing the efficiency of equipment use and logistics processes by reducing energy and auxiliary material consumption, optimising transport and packaging, reducing emissions and preferring local suppliers.



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6	Digitalisation and flow tracking	Monitoring the circulation of materials, raw materials and waste, improving data and reporting quality.
7	Energy efficiency and RES	Reducing energy consumption, increasing the share of energy from renewable sources.
8	CE criteria in procurement procedures	Taking environmental aspects into account in supplier selection, responsible supply chain management.

E5-2 Actions and resources related to resource use and circular economy

The PxM CG implements circular economy (CE) principles and carries out actions to optimise the consumption of natural and material resources. Responsibility for implementing, carrying out and monitoring CE activities extends to all levels of the PxM CG. These actions include in particular:

Reuse and recycling of materials such as steel, wood, cardboard, plastic, concrete rubble, bricks, glass, gypsum and plastic elements. These materials are used, among other things, in the production of aggregates, metal smelting, recovery of secondary raw materials from cables, and the reuse of prefabricated and construction elements. New developments use recycled materials such as steel, secondary aggregates and asphalt deconstruct where possible.

Monitoring of consumption and circular economy processes. PxM CG monitors material consumption to identify savings and increase the efficiency of recovery and recycling processes. These measures are particularly important in projects with environmental certifications (BREEAM, WELL), where systemic solutions for material management and procurement optimisation are applied.

Waste minimisation. The organisation implements measures to minimise waste, both in production processes and on construction sites. Examples include the prefabrication of components, the automation of cutting processes, the optimisation of order scheduling and the reuse of backlogged materials from other projects. In order to protect the environment, the Capital Group has decided to partially reduce the purchase of drinking water in plastic bottles, replacing them with filtered water dispensers.

Waste segregation in offices. The Polimex Mostostal Capital Group is involved in waste prevention and recovery through systematic segregation for the purpose of reuse. Dedicated waste bins, appropriately labelled, have been implemented in each staff room, while eliminating office bins.

Waste management and segregation during projects. PxM CG has implemented the principles of selective waste segregation, including the separation of fractions such as steel, aluminium, concrete and brick rubble, wood, plastics, glass, paper, hazardous waste and mixed waste. Waste is handed over to authorised recyclers and disposers in accordance with current legislation.

Sustainable logistics. Measures to reduce emissions and waste in logistics include consolidating deliveries, avoiding empty runs, using reusable packaging and upgrading the transport fleet towards lower-emission vehicles. Some deliveries of raw materials are also made by rail.

PxM CG recognises the need to further develop formal circular economy processes, especially for projects not covered by certification systems. It also plans to further strengthen cooperation with clients and suppliers in the area of circular economy and to gradually implement circular economy provisions in contracts with subcontractors.

E5-3 Targets related to resource use and circular economy

The PxM CG included issues related to the circular economy in two independent but mutually complementary documents, i.e. the ESG Strategy and the CE Policy. The CE Policy is a framework document indicating general principles of action in this area, while the ESG Strategy sets directions and development objectives in this area.

The PxM CG ESG Strategy sets directions for actions aimed at the full implementation of CE principles in long-term construction projects, taking into account both recycling of materials and their sustainable production.

The objectives relating to circular economy matters are indicated below; these are voluntary objectives which do not arise from imposed obligations:

OBJECTIVE 2 Creating a circular economy in the Polimex Mostostal Capital Group

Increasing the use of materials and raw materials that comply with the principles of the circular economy

Measures:

- developing a policy on circular economy by the end of 2025. - the action has been implemented.



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- developing and implementing procedures to manage surplus materials, equipment and other resources that can be reused in subsequent projects, by the end of 2027.

Actions:

- 1) developing a system for monitoring and analysing waste in production processes:
 - Identifying key areas where waste is generated and develop strategies to minimise it,
 - cyclical data analysis in order to undertake preventive actions, such as optimisation of production processes or introduction of new technologies limiting the amount of waste.
- 2) Introducing educational programmes on circular economy:
 - Organisation of training for employees and subcontractors on the principles of the circular economy,
 - Awareness campaigns promoting the importance of using local materials, recycled products and environmentally certified raw materials,
 - Introducing competitions and initiatives to encourage employees to come up with ideas to reduce waste and reuse resources.
- 3) Striving to increase the share of electronic documentation workflow – Defining the scope of electronic documentation for all projects by 2026 – Digitising administrative processes:
 - Implementing a digital records management system that reduces the need to print and store paper versions of documents,
 - Automation of administrative processes such as e-invoicing, digital time recording and material declarations.
- 4) Training for employees in the use of digital tools:
 - Organising periodic training on the use of digital systems and tools to support circular economy, such as waste tracking platforms and document management systems,
 - Supporting employees in adapting to new technological solutions through mentoring and training materials.
- 5) Systematic monitoring of waste management at production sites and projects:
 - Regular waste management audits, including classification, segregation and recycling options,
 - Implementing tools to track waste from its creation to its final management (e.g. recycling, disposal).

Modernisation of technology in production facilities

Measures:

- Increasing efficiency in the use of raw materials and materials in production processes.
- Reduction in production waste rate.

Actions:

- 1) Aiming to minimise paint consumption in anti-corrosion painting services:
 - To a certain extent, replacing traditional hydrodynamic painting for components characterised by high paint consumption through their openwork geometry with powder coating technology, which is characterised by higher paint efficiency and less material loss.
 - Estimated reduction in paint consumption of around 30% over five years, which will translate into a reduction in the cost and environmental footprint of the painting process.
- 2) Reducing the galvanising temperature by modifying the chemical composition of the galvanising bath and using green hydrogen to heat the galvanising baths:
 - Reduction in energy consumption due to lower operating temperatures.
 - Reduction of zinc consumption by obtaining an even coating thickness.
 - Extension of the durability of technological installations by reducing thermal loads.
- 3) Optimisation of transports – reducing the time of the loading process and the amount of additional packaging materials used.
 - Automation of loading and transport processes to reduce the time of logistics operations.
 - Improving the organisation of internal and external logistics.
 - Use of reusable packaging materials.
 - Optimisation of packaging designs to reduce the amount of raw materials used (e.g. less foil, cardboard boxes).



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- 4) Achieving a steel construction waste rate of 8% in 2030 and 6% in 2035.
 - Optimisation of steel design and fabrication processes for precision material cutting.
 - Implementing in-house recycling systems, allowing steel waste to be reused in production processes.
 - Working closely with raw material suppliers to minimise material losses at the delivery stage.
- 5) Optimisation of internal plant logistics by implementing an IT system for managing schedules, orders and mapping logistics processes.
- 6)

E5-4 Resource inflows

The PxM CG analyses resources introduced into the organisation in terms of their environmental impact, covering materials used in projects, products and packaging, water consumption and property, plant and equipment. The scope of the analysis covers the own activities of the Capital Group and the upstream phase, including suppliers and subcontractors.

The assessment is carried out on the basis of data from purchase invoices, materials records, consumption measurements and information on actual resource use. The projects carried out use in particular metallurgical, welding, electrical, technical, installation, insulation, thermal insulation, wall, roofing and chemical materials, as well as wood and concrete, with their structure depending on the specific nature of the project and technical requirements.

The analysis of data presented in this area was carried out on the basis of information resulting from purchase invoices and actual consumption of materials. In 2025, the Capital Group did not identify the risk of double counting data.

Table 27. Resource inflows and outflows in the PxM CG in 2025.

Resource inflows	Entity	2025	2024
Total weight of products inflows	Mg	611,788.19	6,035.13
Total weight of technical materials inflows	Mg	89,319.17	358.34
Including the total weight of reused or used components, reused intermediates and secondary raw materials used in the manufacture of the company's products and services (including packaging)	Mg	2,354.53	-
Total mass of biological materials inflows	Mg	17.35	95.57
Including those from sustainable sources	Mg	-	-
Total mass of technical and biological materials inflows	Mg	293.10	453.91
Total mass of products, technical and biological materials	Mg	929.12	6,489.04
Percentage of biological materials from sustainable sources	%	-	-
Percentage of materials reused	%	-	-
Resource outflows	Entity	2025	2024
Total weight of products	Mg	170,168.91	6,070.23
Total mass of recyclable products	Mg	110,260.42	5,691.51
Total weight of packages	Mg	28,859.87	136.98
Total mass of recyclable packaging	Mg	28,859.87	126.21
Recyclable material content ratio of products	%	65%	93%
Recyclable material content ratio of packaging	%	100%	64%

Material differences between the data for 2025 and the comparative data for 2024 result primarily from the improvement of the data collection, validation and consolidation process in 2025. In 2024, the reporting process did not fully cover all required data categories and was carried out with limited availability of resources and lower



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organisational maturity. In 2025, quarterly data collection was implemented, dedicated ESG coordinators were appointed in the companies of the Capital Group, reporting forms were clarified and training was conducted, which translated into higher completeness and quality of the data disclosed. Consequently, the data for 2024 have limited comparability with the data for 2025.

E5-5 Resource outflows

In the case of the activities of the Capital Group, generated waste is an important aspect of environmental impact.

Table 28. Outflows of resources from the PxM CG in 2025.

Resource outflows	Entity	2025	2024*
WASTE SENT FOR RECYCLING			
Hazardous waste	Mg	3,342.03	119.77
Preparation for re-use	Mg	0.52	0.00
Recycling	Mg	1,729.27	7.23
Other recovery operations	Mg	1,319.23	18.49
Non-hazardous waste	Mg	51,405.78	33,672.97
Preparation for re-use	Mg	35.41	15.43
Recycling	Mg	1,038.83	8,543.10
Other recovery operations	Mg	4,544.68	1,111.73
Total amount of waste sent for recycling	Mg	54,747.81	33,792.74
WASTE SENT FOR DISPOSAL			
Hazardous waste	Mg	3,302.75	138.36
Incineration	Mg	32.35	0.87
Landfill	Mg	0.68	3.66
Other disposal operations	Mg	8.59	13.73
Non-hazardous waste	Mg	2,077.78	3,821.84
Incineration	Mg	22.38	0.00
Landfill	Mg	62.27	212.75
Other disposal operations	Mg	78.17	34.85
Total amount of waste sent for disposal	Mg	5,380.53	3,960.21
Total amount of radioactive waste	Mg	0.00	300.00
Total amount of waste generated for recycling	Mg	4,179.24	53.69
Total amount of waste not recycled	Mg	526.91	141.82
Percentage of waste not recycled	%	8.00	14.00
Total hazardous waste	Mg	3,342.03	119.77
Total non-hazardous waste	Mg	60,965.55	37,986.87
Total waste	Mg	64,307.58	38,106.64

*Data for 2024 were modified in order to reflect 2024 and 2025 using the same waste calculation methodology.

The largest bulk group of waste is concrete and concrete rubble from demolition and renovation (code 17 01 01), bituminous mixtures (code 17 03 02), soil, earth including stones (code 17 05 04), iron and steel (code 17 04 05), and mixed construction, renovation and dismantling waste (code 17 09 04).

Recycled waste accounts for the largest percentage of all waste generated by the PxM CG. This group of waste is mainly dominated by: iron and steel (code 17 04 05), ferrous metals (code 19 12 02), waste from turning and sawing of iron and its alloys (code 12 01 01), copper, bronze, brass (code 17 04 01), soil and earth, including



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stones (code 17 05 04), zinc ash (code 11 05 02), wood (code 17 02 01), bituminous mixtures (code 17 03 02), and concrete waste and concrete rubble from demolition and renovation (code 16 01 19, code 17 01 01).

Among the group of **processed waste**, the largest percentage consists of plastic packaging (code 15 01 02, code 16 01 19, code 17 02 03), metal waste (code 15 01 04) and glass (code 16 01 20).

Waste subject to recovery includes: used grinding materials (code 12 01 21), paper and cardboard packaging (code 15 01 01), used equipment (code 16 02 14), alkaline batteries (code 16 06 04), mixtures of concrete, bricks and rubble (17 01 07), and insulation materials (code 17 06 04).

Recoverable waste can be segregated and recycled to reduce the amount of waste going to landfill and minimise the impact on the environment. The process of recovering raw materials from these wastes aims to reduce the consumption of natural resources and energy and reduce greenhouse gas emissions.

Non-hazardous waste subject to disposal includes: waste from the rubber industry and rubber production (code 07 02 80), mixed packaging waste (code 15 01 06), sorbents, filter materials, wiping cloths, rags, cloths (code 15 02 03), used tyres (code 16 01 03), and mixed construction, renovation and dismantling waste (code 17 09 04). Waste is destined to be disposed of in an environmentally safe manner, usually through appropriate treatment and disposal processes.

Hazardous waste subject to disposal includes: waste paint and varnish containing organic solvents (code 08 01 11*), water-based developer and activator solutions (code 09 01 01*), fixer solutions (code 09 01 04*), other engine, gear and lubricating oils (code 13 02 08*), other solvents and solvent mixtures (code 14 06 03*), packaging containing residues of dangerous substances (code 15 01 10*), metal packaging containing hazardous porous components (code 15 01 11*), absorbents, filter materials (code 15 02 02*), discarded equipment containing hazardous components (code 16 02 13*).

Once the required quantity has been reached, the waste is collected by an authorised company for disposal to avoid harm to human health and the environment.

EU TAXONOMY DISCLOSURES

The calculation of the environmentally sustainable activities of the Polimex Mostostal Capital Group (“PxM CG”, “Capital Group”) was prepared on the basis of European Union laws regulating the EU Taxonomy, in particular: Regulation (EU) 2020/852 of the European Parliament and of the Council and delegated acts of the European Commission, including Regulations (EU) 2021/2139, 2021/2178, 2022/1214, 2023/2485, 2023/2486, 2024/3215 and (EU) 2026/73.

In preparing the disclosure, interpretative communications, official explanations of the European Commission concerning the application of the EU Taxonomy, guidelines and sets of questions and answers of the European Commission concerning the application of the EU Taxonomy, including those relating to Article 8 of Regulation 2020/852, were also taken into account. On the part of the Capital Group, the methodological basis also included internal working materials, in particular the methodology for qualifying activities for the Taxonomy and a set of types of taxonomy activities together with descriptions and technical screening criteria for activities identified as potentially material for the PxM CG. Meetings were also held with the working teams.

The accounting principles adopted for calculating the EU Taxonomy indicators are consistent with the principles applied in the consolidated financial statements of the Capital Group, taking into account the definitions and presentation requirements arising from Delegated Regulation (EU) 2021/2178. With respect to the disclosures for 2025, the PxM CG applied changes arising from European Union regulations, covering the content and presentation of disclosures and selected rules for calculating indicators, in particular in accordance with the requirements of Commission Delegated Regulation (EU) 2026/73 of 4 July 2025 amending Delegated Regulation (EU) 2021/2178 as regards the simplification of the content and presentation of information concerning environmentally sustainable activities to be disclosed, and Delegated Regulations (EU) 2021/2139 and (EU) 2023/2486 as regards the simplification of certain technical screening criteria for determining whether an economic activity does no significant harm to environmental objectives.

The information presented in this disclosure relates to the period from 1 January 2025 to 31 December 2025. The data used for calculations came from the financial and accounting systems of the companies of the Capital Group and from reporting packages prepared for consolidation purposes. At the aggregation stage, rules consistent with financial consolidation were applied, in particular intragroup turnover was eliminated so that only revenue generated from external customers was included in the calculation of the turnover indicator; additionally, a materiality threshold of PLN 1 million was adopted. PLN and 500 thousand. PLN. The values shown in the denominators of the turnover, CapEx and OpEx indicators are reconciled with the consolidated financial



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statements, and the values included in the numerators are based on identifiable projects, products, services, investments or operating costs assessed in accordance with the adopted methodology.

The entire work was divided into four main phases. The first Phase involved identifying those types of activities that may fall within the scope of the EU Taxonomy. For this purpose, the activities of all material companies of the Capital Group were analysed, with particular focus on the segments: energy, oil, gas, chemicals, industrial construction, infrastructure construction and production of steel structures. In the course of these works, the starting point was not the name of the project, product or service itself, but their actual scope, purpose, the role of a given company in the value chain and the nature of contractual responsibility. NACE codes were used only on an auxiliary basis. Eligibility was determined primarily by the compliance of the activity actually performed with the description of the activity contained in the relevant delegated act, and not merely by the formal similarity of the name or statistical code.

The second Phase consisted of mapping projects, products and services to the appropriate types of taxonomy activities and assigning financial data to them. In the case of project companies, individual contracts or their separate parts were analysed, if only part of the project scope corresponded to an activity eligible under the EU Taxonomy. In the case of production activities or recurring services, groups of homogeneous orders and the largest contracts were analysed, taking into account whether the company is responsible only for delivery or also for installation, construction or commissioning. As a result, revenue, capital expenditure and, to the extent required by the regulation, operating costs were assigned to the appropriate types of activity. Source data from the companies were then aggregated at the level of the Capital Group.

The third Phase involved assessing the alignment of activities eligible under the EU Taxonomy. For each type of activity, compliance with the technical screening criteria was assessed, comprising: criteria for a substantial contribution to the relevant environmental objective, the Do No Significant Harm (“DNSH”) principle with respect to the remaining environmental objectives, and assessment of compliance with minimum safeguards. The assessment was carried out at the level of projects, groups of homogeneous products or types of services, taking into account the availability of documentation that may constitute evidence of compliance with individual requirements. In 2025, this process became significantly more formalised, and the analysis was based on standardised data sheets and an internal instruction provided to the companies.

The fourth Phase concerned data aggregation, calculation of indicators and preparation of disclosure tables. Data from individual companies were aggregated in compliance with consolidation rules. Values were classified separately as eligible activities, aligned activities and non-eligible activities, with aligned activities constituting a subset of eligible activities. The final indicators were calculated in accordance with the formulas arising from Delegated Regulation (EU) 2021/2178 and subsequent delegated regulations, taking into account official explanations of the European Commission concerning taxonomy disclosures. The templates for EU Taxonomy disclosure tables were prepared in accordance with Commission Delegated Regulation (EU) 2026/73, published in the Official Journal of the EU on 8 January 2026.

The turnover indicator was determined by comparing revenue assigned to taxonomy-eligible and taxonomy-aligned activities with the total consolidated sales revenue of the Capital Group. The denominator consisted of revenue disclosed in the consolidated statement of profit or loss, after taking into account consolidation eliminations. The numerator included revenue from contracts, products and services which, based on the analysis carried out, were assigned to activities covered by the EU Taxonomy. In cases where only part of a project corresponded to an eligible activity, only the appropriately separated part of the value was assigned to the numerator, estimated on the basis of available operating or controlling data.

The CapEx indicator was based on capital expenditure disclosed in the consolidated financial statements, primarily in items relating to property, plant and equipment, investment property and assets under construction, to the extent corresponding to the definition in the regulation. For investments that could be directly assigned to a specific activity, direct assignment was applied. In the case of investments of a general nature, such as machinery, construction equipment, selected elements of IT infrastructure or means of transport used on multiple contracts and in various companies, a proportional allocation method based on the revenue structure was applied. However, if more precise operating data were available for a given asset, a more direct allocation key was preferred. Due to the low value of the denominator and the materiality threshold not being exceeded, the calculation of the CapEx indicator was waived.

The OpEx indicator was calculated only in relation to those cost categories that fall within the definition set out in Delegated Regulation (EU) 2021/2178, i.e. research and development costs, costs of maintenance and repair of fixed assets, costs of short-term leases, rental and lease costs, and costs of ongoing maintenance of buildings



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and infrastructure. The Capital Group did not include in this indicator costs that do not meet the Taxonomy definition, such as depreciation, financial costs or general selling and administrative expenses.

Where costs were common in nature and simultaneously supported aligned activities, eligible but non-aligned activities and non-eligible activities, proportional allocation based on the structure of activities and revenue was applied. Due to the low value of the denominator and the materiality threshold not being exceeded, the calculation of the OpEx indicator was waived.

The assessment of compliance with minimum safeguards was carried out taking into account Article 18 of Regulation (EU) 2020/852. The verification process was based on an internal, expanded control matrix referring to the OECD Guidelines for Multinational Enterprises, the fundamental conventions of the International Labour Organization and the UN Guiding Principles on Business and Human Rights. The analysis focused in particular on the areas of human rights, labour rights, anti-corruption, taxation and fair competition. Issues relating to relationships with customers and recipients were also taken into account on an auxiliary basis, to the extent adequate to the business model of the Capital Group.

Compliance with minimum safeguards in the Polimex Mostostal Capital Group is based on a set of interrelated internal regulations and control mechanisms. The Capital Group focuses on ensuring safe, healthy and decent working conditions, operates a comprehensive OHS management system, conducts training, monitors incidents and applies the principle of striving for “zero accidents”. In relations with contractors, the Code of Conduct for Contractors is applied. In its business activities, the PxM CG is guided by applicable laws and high ethical standards, building partnership-based relationships with Customers, Employees and the socio-economic environment. The purpose of the Code of Conduct for Contractors is to apply uniform principles and standards throughout the entire PxM CG, assuming that Contractors conduct their activities with respect for the rule of law, ethics and human rights.

The PxM CG Code of Ethics, updated in 2025, sets standards of conduct applicable regardless of the place of business or type of business relationship. Human rights are included in it as an element of the basic responsibility of the Capital Group and the foundation for shaping organisational culture. The Code refers to the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises and the conventions of the International Labour Organization. The Sustainable Development Policy of the Polimex Mostostal Capital Group, adopted in 2025, sets out the key principles of responsible business conduct, integrated with the long-term business strategy of the PxM CG. This document indicates the overarching objective, which is sustainable development based on high standards of ethics, transparency and modern management. The Capital Group declares respect for human rights, zero tolerance for mobbing and discrimination, the promotion of a culture of equality, inclusion and mutual respect, as well as support for the professional development and well-being of employees.

As part of the assessment of minimum safeguards, the policies and procedures in force in the Group were also verified, including the Code of Ethics, anti-corruption procedures, mechanisms for reporting irregularities and regulations concerning human rights, labour standards and regulatory compliance. In addition, publicly available databases of reports and violations were analysed, including the OECD NCP database and the Business & Human Rights Resource Centre database. As at the date of the analysis, no entries concerning the Polimex Mostostal Capital Group were identified. Disclosures in this respect remain consistent with other parts of the sustainability reporting of the Capital Group.

In 2025, the Capital Group introduced changes in bidding procedures and investment processes aimed at taking EU Taxonomy requirements into account already at the initial stage of business decision-making. The analysis is carried out at the bid preparation stage and includes an assessment of the project scope, environmental objective and availability of documentation necessary to confirm alignment with the Taxonomy. The final taxonomy disclosures were based on orderly, consistent and complete source material. In order to reduce the risk of interpretation discrepancies between companies of the Capital Group, a common data file and a uniform dictionary of activity types were implemented and applied consistently throughout the reporting process. Compared with the disclosures from the previous year, the key changes concern an increase in the level of detail and the degree of formalisation of the assessment and reporting process. Data for 2025 were prepared taking into account explanations published by the European Commission aimed at clarifying technical criteria, simplifying reporting requirements and standardising market practices. Comparative data for 2024 were left in the form published, while data for 2025 were prepared according to the methodology changed in connection with the entry into force of new regulations applicable from 2025.



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Table 29. Percentage share of turnover, capital expenditure and operating expenditure from products or services associated with taxonomy-eligible or taxonomy-aligned economic activities – disclosure relates to 2025, summary of key performance indicators.

Financial year	2025														
Key performance indicator	Total	Share of taxonomy-eligible activities*	Taxonomy aligned activity	Share of taxonomy-aligned activity	Breakdown by environmental objectives of taxonomy-aligned activities						Share of enabling activities	Share of transitional activities	Activity not subject to assessment deemed immaterial	Taxonomy-aligned activity in the previous financial year 2024	Share of taxonomy-aligned activity in the previous financial year 2024
					Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
PXM Capital Group	(PLN thousand)	%	(PLN thousand)	%	%	%	%	%	%	%	%	%	%	(PLN thousand)	%
Turnover	4,130,489.0	51.3%	527,812.6	12.8%	12.8%						8.3%		0.0%	377,886.3	13.2% *
Capital expenditure	71,358.0	0.0%		0.0%										0.0	0.0%
Operating expenditure	28,973.4	0.0%		0.0%										0.0	0.0%

* In the 2025 Sustainability Report, comparative data for 2024 were left in the form published; data for 2025 were prepared according to the methodology changed in connection with the entry into force of new regulations.

* The non-financial undertaking indicates in column (3) a zero value of the key performance indicator for taxonomy-eligible activities, respectively for capital expenditure and operating expenditure; disclosure in the scope of Template 2 tables in accordance with Delegated Regulation (EU) 2026/73 for this key performance indicator is omitted.



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Table 30. Percentage share from products or services associated with taxonomy-eligible or taxonomy-aligned economic activities – disclosure relates to 2025, breakdown by activity.

Reported key performance indicator	Turnover												
Financial year	2025												
Business activity	Code	Key performance indicator for taxonomy-eligible activity (share of taxonomy-eligible turnover)	Key performance indicator for taxonomy-aligned activity (monetary value of turnover)	Key performance indicator for taxonomy-aligned activity (share of taxonomy-aligned turnover)	Environmental objective of taxonomy-aligned activity						Enabling activity	Transitional activity	Share of taxonomy-aligned activity in taxonomy-eligible activity
					Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Polimex Mostostal Capital Group		%	(PLN thousand)	%	%	%	%	%	%	%			%
Production of renewable energy technologies	CCM3.1	0.3%	0.0	0.0%	0.0%						E		0.0%
Manufacture of energy efficiency equipment for buildings	CCM3.5	5.4%	0.0	0.0%	0.0%						E		0.0%
Manufacture of other low carbon technologies	CCM3.6	0.4%	0.0	0.0%	0.0%						E		0.0%
Electricity generation using solar photovoltaic technology	CCM4.1	1.2%	51,580.7	1.2%	1.2%								100.0%
Electricity generation from wind power	CCM4.3	8.3%	342,793.3	8.3%	8.3%								100.0%
Manufacture of biogas and biofuels for use in transport and of bioliquid	CCM4.13	5.9%	0.0	0.0%	0.0%								0.0%
Infrastructure for personal mobility, cycling logistics	CCM6.13	0.1%	3,972.0	0.1%	0.1%						E		100.0%
Infrastructure enabling low-carbon road transport and public transport	CCM6.15	4.9%	0.0	0.0%	0.0%						E		0.0%
Construction of new buildings	CCM7.1	6.6%	129,466.7	3.1%	3.1%								47.6%
Installation, maintenance and repair of energy efficiency equipment	CCM7.3	0.5%	0.0	0.0%	0.0%						E		0.0%
Close to market research, development and innovation	CCM9.1	0.0%	0.0	0.0%	0.0%						E		0.0%
Electricity generation from fossil gaseous fuels	CCM4.29	13.7%	0.0	0.0%	0.0%							T	0.0%
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM4.30	4.1%	0.0	0.0%	0.0%							T	0.0%
Total taxonomy-aligned activities broken down by objectives					12.8%								
Total key performance indicator Turnover		51.3%	527,812.6	12.8%	12.8%						11.5%	17.8%	24.9%



ESRS S1 OWN WORKFORCE

SBM-2 Interests and views of stakeholders

Employees of the PxM CG constitute its key resource, contributing to the dynamic development of the organisation for more than 80 years. The Management Board of the Capital Group attaches particular importance to open dialogue with employees, taking their opinions into account when defining strategic initiatives and making key decisions.

In the process of developing the Sustainable Development Strategy of the Capital Group, strategic objectives were agreed taking into account the opinions of employees, who play a key role in their implementation. The involvement of the team in the planning and implementation of the Strategy is the foundation for the successful implementation of sustainability.

The Capital Group provides employees with the opportunity to openly express their opinions on working conditions and initiatives within the organisation, in accordance with the principles set out in the Code of Ethics.

Effective internal communication is achieved through a variety of channels, such as:

- internal e-mail newsletter,
- information posters,
- messages displayed on publicly accessible screens,
- intranet,
- direct meetings and discussions with superiors.

Feedback from employees is usually provided to Management Board members through their supervisors. In situations requiring direct involvement, it is also possible to meet with Management Board members to discuss key issues.

The PxM CG consistently strives to build an open and transparent organisational culture in which the voice of employees has a real impact on the development and operation of the organisation.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

There are two main occupational groups in the Group, classified on the basis of the nature of the work performed:

1. **Production workers** – exposed to physical and chemical agents.
2. **Administrative and office workers** – exposed to prolonged computer workloads.

Occupational risk management

For each of these groups, key risks were identified and appropriate preventive measures implemented:

Production workers are exposed to factors such as noise, vibration, dust, chemicals and electromagnetic radiation. As part of its ongoing activities, the Capital Group implements the provisions of programmes aimed at reducing these risks, including:

- selection and implementation of personal protective equipment,
- mandatory use of hearing protectors in areas of increased noise exposure.

Administrative and office workers perform work with prolonged exposure to a monitor screen, which can lead to musculoskeletal overload. As a preventive measure:

- information on ergonomics and correct posture is provided during health and safety training,
- good practices are promoted to reduce the health burden associated with office work.

Social responsibility and respect for employee rights

No cases of forced labour or child labour were identified in the Group. In addition, PxM implements and pursues initiatives aimed at improving working conditions, including policies and procedures relating to **health and safety, employee rights, prevention of discrimination and anti-bullying**.

The Capital Group exerts a strong and direct influence on its own employees, which it manages by applying internal procedures, and an indirect influence on those employed in the value chain, which it manages by requiring contractors to comply with the **Code of Conduct for Counterparties**.

Staff risks and opportunities are detailed in **disclosure ESRS 2 SBM-3, Table 7**.

S1-1 Policies related to own workforce

The Polimex Mostostal Capital Group's commitment to providing an ethical and safe working environment.

The Group aims to create a working environment based on mutual respect, cooperation and equality. The policies and procedures implemented are aimed at ensuring the highest ethical standards, respecting employee rights and countering all forms of bullying, discrimination and human rights violations.

The Capital Group's policies on employee issues consist of:

- Polimex Mostostal Capital Group Code of Ethics,
- Organisational Regulations of Capital Group companies,
- Labour Regulations governing the rights and obligations of employees and the employer,
- Collective Bargaining Agreements,
- Remuneration Regulations,
- Regulations of the Company Social Benefit Funds.

Code of Ethics – The foundation of organisational culture

The Capital Group Code of Ethics is a key document that establishes uniform rules of conduct for all Capital Group employees and associates. The document sets out a commitment to:

- create safe and decent working conditions,
- prevent all forms of discrimination (based on gender, race, religion, age, sexual orientation, nationality, disability, etc.),
- eliminate bullying and other unethical practices,
- anti-corruption – a ban on accepting and offering bribes,
- effective communication between employees and superiors,
- comply with the highest standards of health and safety.

Employees have the opportunity to report any violations of the principles of the Code of Ethics to the Ethics Committee, in a confidential manner and in accordance with the defined procedure.

Labour Regulations and protection of employees' rights

The Capital Group's various companies have Labour Regulations that clarify key employment issues, including:

- rules for ensuring safe and hygienic working conditions,
- protection against discrimination and harassment,
- deadlines for payment of salaries,
- leave arrangements and parental entitlements,
- work organisation standards and working time regulations.

In addition, the Capital Group has implemented numerous procedures to ensure the highest standards of employee protection, including:

- Procedure for Hazard Identification and Occupational Risk Assessment,
- Health and Safety Monitoring Procedure,
- Recruitment, employment and termination procedures,



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- Notification and registration of work in specific conditions and of a specific nature in the Polimex Mostostal Group,
- Clean Desk and Clean Screen policies,
- Procedure for employee training for companies forming part of the Capital Group.

Responsibility for respecting human and labour rights

The Capital Group is committed to upholding international human and labour rights standards, as reflected in its policies. Key areas include:

- Preventing all forms of discrimination in the workplace, i.e. on the basis of gender, race, religion, age, sexual orientation, disability, nationality and others,
- Equal opportunities in pay, promotions and access to training,
- Respect for freedom of association and the right to form trade unions,
- Prevention of child labour and forced labour,
- Occupational health and safety (OHS) – implementing solutions to protect the health and lives of employees.

As at the date of preparation of this report, the Polimex Mostostal Capital Group does not have separate obligations arising from internal regulations in the area of implementing social inclusion measures aimed at persons from groups particularly exposed to risks among its own workforce or dedicated positive measures for their benefit. At the same time, the PxM CG, guided by the principles of equal treatment and counteracting discrimination, ensures equal access for all employees to employment, professional development and working conditions, regardless of individual characteristics or belonging to specific social groups.

Compliance with international human rights standards

The Capital Group conducts its business in accordance with the highest ethical and legal standards, both in a national and international context. The activities of the Capital Group focus primarily on European Union markets, where strict standards concerning human rights and employee rights apply.

The Capital Group follows the following guidelines:

- OECD for Multinational Enterprises,
- UN on business and human rights,
- International Labour Organisation (ILO) – adhering to the principles set out in the eight fundamental conventions of the ILO Declaration.

In addition, the Capital Group respects international human rights standards, including:

- The International Bill of Human Rights, which includes the Universal Declaration of Human Rights,
- International Covenant on Civil and Political Rights,
- International Covenant on Economic, Social and Cultural Rights,
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

Transparency and accessibility of Capital Group policies

All policies of the Capital Group concerning employee rights are available to employees and associates on the Intranet.

The Capital Group consistently strives to build an ethical, safe and employee-friendly organisation in which respect for human rights and employment standards forms the foundation of its activities.



S1-2 Processes for engaging with own workers and workers' representatives about impacts

Collective Bargaining Agreements

Oversight of employee issues, including liaising with employees and their representatives on actual and potential impacts on employee resources, is the responsibility of the CEO as head of the unit. They are responsible for the sound design of the collaborative framework and for integrating its results into the Capital Group's approach to human capital management. When making decisions concerning working conditions, remuneration, organisation of working time or OHS activities, the opinions and reported needs of employees, articulated by their representatives, i.e. the employee side, are taken into account.

Within the organisational structure, the main role in formal contacts with employees and their representatives is performed by the Director of the HR Office. The office reporting to him is responsible for ongoing communication, organisation of social dialogue processes and responding to reported needs. Where appropriate, depending on the nature and importance of the issues raised, communication with employees may also be conducted directly by other levels of management and leadership throughout the Capital Group's organisational structure.

Company Collective Labour Agreements are in force in some companies forming part of the Capital Group, constituting agreements concluded between the employer and trade union organisations. These documents set out key aspects of working conditions, including mechanisms to ensure transparency and consideration of employee voice. The employee side, as the representative of employees within these mechanisms, is involved at various stages of human resources processes, from identifying problems, through giving opinions on solutions, to assessing their effectiveness.

On the basis of the Collective Bargaining Agreements, the companies provide the trade unions with information on the functioning and internal organisation of the company, such as the state of employment, the company's financial results, the average wage in the company or the number of overtime hours. Thanks to ongoing cooperation with the trade unions, clear forms and principles for the remuneration of PxM Capital Group employees are also established. The Capital Group companies engage in dialogue with trade unions to maintain good relations with employees and to respond on an ongoing basis to any problems or inconveniences that arise.

The Management Boards of the companies are obliged to respond to requests for additional information from the trade union organisations without delay, but no later than within 14 days of receipt of the request. In addition, in order to cooperate, companies allow representatives of trade union organisations to actively participate in meetings dealing with issues concerning collective interests and workers' rights.

Companies are also obliged to hold meetings periodically or at the request of trade union organisations to discuss important internal matters.

Transparency of communication and accessibility for employees

The Capital Group ensures open and transparent communication with both employees and external Stakeholders. The Capital Group uses a variety of communication methods, enabling contact through:

- telephone, e-mail and face-to-face meetings,
- a website adapted to the needs of the visually impaired,
- social media – Facebook and LinkedIn,
- company and project offices,
- public reporting and disclosure obligations as a listed company,
- direct meetings with supervisors and staff meetings.

S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns

Reporting problems and irregularities

The Code of Ethics of the Polimex Mostostal Capital Group provides for the possibility of reporting breaches of the Code, abuses and other irregularities in a manner convenient for the reporting person, including anonymously. Detailed rules for reporting breaches and taking follow-up actions are regulated in the Policy on reporting information on breaches of law and taking follow-up actions applicable in the Group. Solutions and channels for reporting irregularities are described more broadly in disclosure [G11]



S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Impact of employee initiatives on organisational development

In the Capital Group, good relations between employees and the company and between employees themselves have a significant impact on the development of the organisation. Through a responsible social policy, the Capital Group builds employee commitment, loyalty and satisfaction, which translates into a positive workplace atmosphere and team effectiveness.

These measures are part of PxM CG 's long-term strategy, which aims not only to ensure competitive employment conditions, but also to create a stable and friendly working environment that supports employee well-being.

Internal regulations

The PxM Capital Group has established employment regulations for individual companies, which regulate all issues related to the rights and obligations of both employees and the employer (such as the obligation to counteract discrimination, ensure safe and hygienic working conditions, timely payment of remuneration or create conditions conducive to social and professional adaptation for persons newly employed in the PxM CG companies), as well as the principles for granting holidays, parental rights, working time rules or regulations concerning internal order and work organisation.

These regulations serve as a basic tool for preventing negative impacts by clearly defining rules for employee protection and work safety, and they limit the risk of violations of employee rights.

Support for employees in difficult situations

The Company Social Benefits Funds in force in the companies of the Capital Group provide support to employees, among others, through:

- Subsidies for holiday leave organised by employees on their own initiative,
- Subsidies for organised forms of recreation for children and young people,
- Financial assistance for people in particularly difficult life and financial situations,
- Support for cultural, educational, sports and recreational initiatives, such as company events, team-building events and sports activities.

Within the Company Social Benefits Funds established in the PxM CG companies, fund resources are allocated, among other things, to financial assistance in the form of hardship benefits granted to persons in particularly difficult life and financial situations and in random events. In 2025, the Social Benefits Fund Committees granted random-event hardship benefits to applicants.

Special actions and community initiatives

The Capital Group engages in charity and social activities, supporting its employees and local communities, such as a collection for an animal shelter.

The Company undertakes special campaigns and initiatives related to strengthening the positive impact of its employees, such as: Christmas meetings, special campaigns, Safety Week.

Participation in these events is voluntary, and their main objective is to strengthen the positive impact on employee well-being, team integration and building a friendly organisational culture.

Commitment to occupational health and safety initiatives

The Capital Group actively cooperates within the Agreement for Safety in Construction, aiming to raise health and safety standards at work.

Agreement activities include:

- Participation in consultations on occupational safety,
- Implementation and dissemination of health and safety best practices,



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- Ensuring that employees have access to up-to-date information and the opportunity to participate in activities related to the improvement of working conditions.

In addition, employees have the opportunity to benefit from health-promoting campaigns aimed at enabling employees to take part in basic preventive examinations, i.e. full blood count with automated differential, glucose measurement or weight and height measurement together with BMI calculation and interpretation.

Managing the risk of human rights violations

The Capital Group does not conduct activities in countries with an increased risk of human rights violations, including in particular the risk of child labour or forced labour. Therefore:

- The Capital Group does not violate labour law and strongly opposes all forms of forced labour. No cases of human rights violations were recorded in any of the companies of the Capital Group,
- the risk of human rights violations, including child labour or forced labour, both in the Group and [1]in its supply chain, is assessed as negligible,
- the companies of the Capital Group do not employ minors, except in cases permitted under applicable labour law, and strongly oppose all forms of forced labour.

Monitoring and formalisation of activities

The initiatives described above have been implemented periodically for many years in the PxM CG . Despite their regular implementation, they have not been formally included in official documents monitoring their impact and effectiveness. In 2025, an employee satisfaction survey was conducted. Employee needs and opinions are analysed on an ongoing basis as part of everyday cooperation and available internal communication channels.

The PxM CG conducts multifaceted activities to ensure effective dialogue with employees. In 2025, the Employee Programme Centre was launched in the PxM CG, under which activities are carried out to support employee well-being, integration and the development of passions and competences beyond daily duties. Through the programme, employees have access to events and activities that help them take care of balance, health and good energy, both at work and outside work. In 2025, no action was taken to mitigate the negative impact of the transition to a greener and climate-neutral economy for employees.

The PxM CG allocates significant organisational and human resources to managing impacts concerning its own workforce. This includes the activities of the HR Office and the OHS and Environmental Protection Office.

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

In 2025, the Capital Group adopted the ESG Strategy, which clearly emphasised the importance of employee matters for PxM management. The objective and activities relating to the employee area are presented below:

OBJECTIVE 4: Strengthening the safety culture and concern for health at Polimex Mostostal Capital Group

OBJECTIVE 4.1: Striving to systematically reduce accident rates in the Polimex Mostostal Capital Group

Measures:

- Maintaining the accident severity ratio in the Polimex Mostostal Group at the current level or lower (absenteeism / number of accidents) until 2025.
- Consistent efforts to reduce the accident frequency rate (number of accidents * 1000 / average employment).
- Carrying out at least one documented health and safety inspection and monitoring per week on ongoing projects and periodic reviews in companies.
- Maintaining a high level of worker safety awareness – 100% of manual workers on construction sites trained annually in health and safety.



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Actions:

1. Continuous monitoring of the state of health and safety and recording of irregularities at production sites and on ongoing projects.
2. Regular education to minimise the risk of accidents and incidents that may contribute to lower motivation and health of employees.
3. Organisation of regular workshops on occupational safety:
 - Thematic workshops covering key hazards in the industry, e.g. working at heights, operating machinery or transporting hazardous chemicals.
 - Participation of external experts (e.g. health and safety inspectors, occupational doctors) in training and workshops for employees.
4. Implementing a reporting system for potentially hazardous events:
 - Engaging 100% of the workforce to report incidents within the reporting system,
 - Regular analysis of reports from the health and safety team to identify the most common hazards and implement preventive measures.

Safety objectives are included both in the ESG Strategy document and in the objectives of all members of the management boards of the PxM CG.

Staff participation in goal definition:

PxM CG has adopted a cascade approach to setting ESG targets, ensuring active participation of employees in defining strategic directions. ESG representatives were appointed in the subsidiaries to act as liaisons between the ESG Strategy team and staff in their respective business units. These representatives collected and communicated the opinions, needs and expectations of employees, so that ESG objectives were tailored to the real challenges and specificities of each unit's operations. This process enabled bottom-up engagement and the creation of a strategy that incorporated the perspectives of various internal Stakeholder groups.

S1-6 Characteristics of the undertaking's employees

The tables in the section present a summary of basic information on employees of the Capital Group for 2025. The data is based on the employment status as at 31 December 2025. The figures relating to employees are presented as the number of employees at the end of the reporting period.

Table 31. Characteristics of the undertaking's employees

Year	Female	Male	Other	Not disclosed	Total
Number of employees (head count/FTE)					
2025	695	3,750	-	-	4,445
2024	677	3,731	-	-	4,408
Number of permanent employees (head count/FTE)					
2025	513	3,071	-	-	3,584
2024	496	3,024	-	-	3,520
Number of temporary employees (head count/FTE)					
2025	182	679	-	-	861
2024	181	707	-	-	888
Number of non-guaranteed hours employees (head count/FTE)					
2025	-	-	-	-	-
2024	-	-	-	-	-
Number of full-time employees (head count/FTE)					
2025	685	3,728	-	-	4,413
2024	661	3,707	-	-	4,368



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Year	Female	Male	Other	Not disclosed	Total
	Number of part-time employees (head count/FTE)				
2025	10	22	-	-	32
2024	16	24	-	-	40

The majority of the PxM CG employees are employed full-time. Some workers benefit from the flexibility offered by part-time work.

Table 32. Characteristics of the employment patterns of PxM CG employees as at 31.12.2025.

Year	Female	Male	Other	Not disclosed	Total
	Number of employees on an employment contract				
2025	695	3,750	-	-	4,445
2024	677	3,731	-	-	4,408
	Number of employees on employment contract for a fixed period				
2025	182	679	-	-	861
2024	181	707	-	-	888
	Number of employees on employment contract for an indefinite period				
2025	513	3,071	-	-	3,584
2024	496	3,024	-	-	3,520
	Number of employees on employment contract full-time				
2025	685	3,728	-	-	4,413
2024	661	3,707	-	-	4,368
	Number of employees employed under part-time employment contracts				
2025	10	22	-	-	32
2024	16	24	-	-	40

The PxM CG did not record significant fluctuations in the number of employees during the reporting period or between reporting periods. The turnover rate takes into account all employee departures.

Table 33. Employee turnover in the PxM CG in 2025.

	2025	2024
Average employment head count (employment contracts)	4,459.19	4,403.96
Number of employees (head count) who left the organisation during the reporting period	640	658
Turnover rate	14.35%	14.94%

No significant fluctuations in the number of employees were recorded during the reporting period or between reporting periods. The indicator includes all employee departures.

The only country in which the Capital Group employs at least 10% of all employees is Poland, and therefore the Capital Group does not present information on the number of employees broken down by country. All PxM CG employees are employed in Poland.



S1-7 Characteristics of non-employee workers in the undertaking's own workforce

In the Capital Group, persons performing work under civil law contracts mostly perform conceptual and specialist work, such as:

- Supervision, control and consultancy,
- Project management and work direction,
- Creative services of an individual nature.

A small percentage of contracts are for manual work, including:

- Assembly and welding,
- Cleaning services,
- Other specialised technical services.

The majority of members of the Management Boards of companies comprising the PxM CG are employed under management contracts, which corresponds to the nature of their functions and the Capital Group's organisational model.

Contracts with temporary employment agencies relate to a range of services that have as their object the performance of specialised services, particularly of a manual work nature (e.g. assembly, welding, cleaning).

PxM CG takes a consistent and stable approach to employment, ensuring transparency and compliance of civil contracts with applicable regulations and best market practices. Non-employee figures are presented as the number of employees at the end of the reporting period.

Table 34. Data on PxM CG workforce resources not employed under employment contracts as at 31 December 2025.

Year	Female	Male	Other	Not disclosed	Total
	Number of persons working under civil law contracts (contracts of mandate and specific task contracts)				
2025	30	29	-	-	59
2024	22	38	-	-	60
	Number of people on management contracts.				
2025	1	11	-	-	12
2024	2	13	-	-	15
	Number of persons – appointment				
2025	17	22	-	-	39
2024	3	22	-	-	25
	Number of persons working under cooperation agreements, B2B – sole proprietorship				
2025	23	143	-	-	166
2024	19	126	-	-	145



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S1-8 Collective bargaining coverage and social dialogue

Table 35. Collective bargaining agreements and social dialogue in 2025.

Year	Collective Bargaining Agreement		Remuneration Regulations	
	EEA* employees	Employees outside the EEA*	EEA* employees	Employees outside the EEA*
% of total employees covered by collective agreements				
0-19 %				
2025	-	-	546	-
2024	-	-	563*	-
20-39 %				
2025	-	-	-	-
2024	-	-	-	-
40-59 %				
2025	-	-	-	-
2024	-	-	-	-
60-79 %				
2025	-	-	-	-
2024	-	-	-	-
80-100 %				
2025	3,788	-	-	-
2024	3,744	-	-	-

*a presentation change was made without changes to the value

The majority of the Capital Group's employees are covered by Collective Bargaining Agreements. Not all companies forming part of the PxM CG have their own collective labour agreements; in accordance with applicable provisions of the Labour Code, Remuneration Regulations are in force in these companies.

In the case of persons who are not subject to Collective Bargaining Agreements or Remuneration Regulations, their applicable work and remuneration rules are contained in the content of their employment contracts/amending agreements. All employees with an employment relationship are also subject to the Labour Regulations in force at the individual PxM CG companies.

Non-employees of PxM CG are guaranteed a minimum guarantee in wages according to the applicable standards, i.e. up to the minimum wage according to the law in Poland.

There are no agreements in place in the PxM CG regarding the representation of employees by:

- European Works Council (EWC),
- Works Council of Societas Europaea (SE),
- Works Council of Societas Cooperative Europaea (SCE).

S1-9 Diversity metrics

Table 36. Diversity indicators in the PxM CG as at 31 December 2025.

Year	Female	Male	Other	Not disclosed	Total
Total contracted employees					
Age group: over 50 years (head count)					
2025	114	1,381	-	-	1,495
2024	117	1,393	-	-	1,510
Age group: 30-50 years (head count)					
2025	490	1,950	-	-	2,440
2024	469	1,915	-	-	2,384



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	Age group: under 30 years (head count)				
2025	91	419	-	-	510
2024	91	423	-	-	514
	Age group: over 50 years (%)				
2025	16%	37%	-	-	34%
2024	17%	37%	-	-	34%
	Age group: 30-50 years (%)				
2025	71%	52%	-	-	55%
2024	69%	51%	-	-	54%
	Age group: under 30 years (%)				
2025	13%	11%	-	-	11%
2024	13%	11%	-	-	12%

The Capital Group has employees from all age groups, which shows that the PxM CG cares about diversity among its employees.

Table 37. Top management in the PxM CG as at 31.12.2025.

Year	Female	Male	Other	Not disclosed	Total
Employed on the basis of an employment contract, contract of mandate, management contract, B2B					
Number of people working in the position: Management Board					
2025	3	22	-	-	25
2024	2	22	-	-	24
Number of people working under appointment					
2025	17	21	-	-	38
2024	2	23	-	-	25
Number of people working in the position: Director					
2025	18	104	-	-	122
2024	16	101	-	-	117
% of people working in the position: Management Board					
2025	0.06%	0.47%	-	-	0.53%
2024	0.04%	0.47%	-	-	1.00%
% of persons working under appointment					
2025	0.36%	0.44%	-	-	0.80%
2024	0.04%	0.49%	-	-	1.00%
% of people working in the position: Director					
2025	0.38%	2.20%	-	-	2.58%
2024	0.34%	2.17%	-	-	3.00%

The following are considered to be top management: members of the Management Board, members of the Supervisory Board, directors and deputy directors.

When calculating the percentage of women and men in top management – the denominator is the total number of people in top management.



S1-10 Adequate wages

Remuneration system in the PxM CG

PxM CG strives to ensure a transparent and fair remuneration system that takes into account both market standards and individual factors affecting employee remuneration.

In Capital Group companies, remuneration issues are regulated through:

- Collective Bargaining Agreements (CBAs),
- Remuneration Regulations,
- Bonus Regulations, which set out the rules for awarding bonuses.

Salaries for individual employees are determined individually based on employment factors, i.e. length of service, education, skills, as well as experience on the basis of:

- Tables of rates of monthly basic remuneration (integral part of the CBAs),
- Tables of positions and rates of monthly basic remuneration (integral part of the Remuneration Regulations).

Any amendments to the CBAs are consulted each time with the trade unions, and amendments to the Remuneration Regulations are consulted with employee representatives.

In addition, the companies also have bonus regulations in place, which contain clear and transparent rules for granting bonuses to employees of Capital Group companies.

PxM CG guarantees that all employees are paid at least in accordance with the applicable standards, i.e. not less than the minimum wage in Poland. In 2025, all persons employed in the PxM CG whose registered office is located in Poland received remuneration, converted into full-time equivalents, at least at the level of the minimum remuneration set for that year, i.e. PLN 4,666 gross.

Table 38. Percentage of PxM CG employees receiving remuneration below the set level of adequate remuneration in 2025.

Indicator	2025	2024
Percentage of employees paid below the agreed level of adequate remuneration.	0.00%	0.00%

S1-11 Social protection

In 2025, all contracted employees of the Group were covered by social protection under public schemes. PxM CG employees are protected against loss of income as a result of:

- disease,
- accident at work,
- acquired disability,
- parental leave,
- retirement.

This protection is provided both through the public scheme and through voluntary benefits offered by the employer.

Employees on civil law contracts (if they are not registered for sickness insurance) and non-employees who work on behalf of a temporary employment agency are not covered by social security protection.

Company's Social Benefit Fund

The PxM CG companies have a Company Social Benefits Fund, which enables employees to benefit from a range of social benefits, such as:

- Employee holiday subsidy – employees can receive financial support for holidays organised on their own,
- Funding for organised recreation for children and young people – support for summer trips, camps, winter camps and so-called green/white schools,



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- Financial assistance for employees in difficult financial situations – the possibility of obtaining an allowance in the event of financial difficulties or special contingencies,
- Housing assistance – in the form of repayable, interest-bearing loans,
- Funding for cultural, educational and recreational events – support for inclusive, cultural and sporting events.

Access to benefits

In the Group, all employees, regardless of their form of employment (full-time, part-time, fixed-term/indefinite contract) have access to the same benefits. Detailed rules for their allocation are set out in the Regulations of the Company Social Benefit Funds in force in most PxM CG companies.

Additional benefits offered to employees

PxM CG, valuing its employees, offers a range of non-wage benefits to support their wellbeing and facilitate their daily functioning. These include:

- Access to private medical care – partly funded by the employer,
- Voluntary life insurance,
- MultiSport cards for the use of sports and leisure facilities.

Friendly Recruitment and Flexible Hiring Processes

PxM CG has implemented innovative solutions to support job candidates, such as:

- Friendly Recruitment – a simple application that allows you to apply for recruitment without having to attach your CV,
- HR helpline – operated by the HR BP Team, providing support for candidates,
- Online recruitment – the majority of interviews are conducted remotely via Microsoft Teams,
- Employee Referral Programme – enabling employees to recommend candidates for employment; successful referrals are rewarded.

PxM CG consistently strives to create a friendly working environment where employees can count on stable employment, social protection and a wide range of fringe benefits to foster their professional development and private life.

S1-12 Persons with disabilities

Table 39. Persons with disabilities in the PxM CG as at 31.12.2025.

Year	Female	Male	Other	Not disclosed	Total
Employees with a contract of employment					
Number of persons with a disability certificate					
2025	14	70	-	-	84
2024	10	59	-	-	69
Percentage*					
2025	2.01%	1.87%	-	-	1.89%
2024	1.48%	1.58%	-	-	1.57%

*When considering the percentage, we include employees of all companies in the Group, on a per capita basis.



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Table 40. Percentage of employees with disabilities in the PxM CG in 2025.

Period	2025	2024
Percentage of employees with disabilities	1.89%	1.57%

No disabled persons among employees subject to legal restrictions on data collection.

S1-13 Training and skills development metrics

In 2025, 27,203.50 hours of training comprising skills development training for employees were delivered across all PxM CG companies, including 20,536 hours of training comprising mandatory health and safety training.

The average number of training hours by gender (all competence development training) per worker was:

- 8.70 hours for women
- 5.19 hours for men

The average number of training hours by gender for mandatory periodic OSH training per worker was:

- 2.03 hours for women
- 4.80 hours for men

Table 41. PxM CG training metrics for 2025.

Year	Female	Male	Employees in general
As at 31/12/2025			
Number of employees (employment contract, civil law contract)			
2025	766	3,955	4,721
2024	704	3,804	4,508
Number of hours of training completed (excluding health and safety training)			
2025	6,661	20,543	27,204
2024	4,122	29,934	34,056
Average number of hours of completed training* by gender			
2025	8.70	5.19	5.76
2024	5.86	7.87	7.55
Number of hours of mandatory periodic training in occupational health and safety completed			
2025	1,556	18,980	20,536
2024	2,264	21,274	23,538
Average number of hours of completed mandatory periodic training in occupational health and safety by gender			
2025	2.03	4.80	4.35
2024	3.22	5.59	5.22

* without health and safety training

There were no regular reviews of performance and career development in any company. Lack of regular performance appraisal activities.



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Table 42. Indicators for performance reviews and career development in the PxM CG in 2025.

Year	Female	Male	Employees in general
As at 31/12/2025			
Number or percentage of staff who participated in regular performance reviews and career development			
2025	0	0	0
2024	0	0	0
Number of appraisals proportional to the agreed number of appraisals made by managers			
2025	0	0	0
2024	0	0	0

Assumptions used to develop the data:

Data scope: all PxM CG companies were included, aggregating information on training delivered between 1 January and 31 December 2025.

Types of training: both internally and externally organised training were included, regardless of the mode of delivery (classroom, online, e-learning). Mandatory periodic OSH training is also covered separately.

Calculation methodology: the average number of training hours was calculated by dividing the total number of hours of training provided by the number of employees of each gender.

Data source: data were collected from internal reporting systems and training records at individual companies.

S1-14 Health and safety metrics

Daily care for the safety, work comfort and development of employees is a priority for the PxM CG. The Capital Group consistently focuses on good relationships within teams, building a safety culture and developing competence.

Employee safety is an overriding value for PxM CG , which is why the Capital Group:

- Scrupulously complies with **all obligations under health and safety legislation**,
- Adapts **safety standards** to the business profile of the Client, Investor and Principal,
- Follows best practice in **accident prevention**,
- Is involved in initiatives to **improve health and safety standards in the construction industry**.

PxM CG is a signatory to the Agreement for Safety in Construction, which aims to:

- Reduce accidents on construction sites,
- Exchange good health and safety practices,
- Unify the approach to safety standards,
- Influence subcontractors and smaller construction companies to improve health and safety standards.

Thanks to these measures, PxM CG is systematically raising health and safety standards, developing the competences of its employees and improving safety throughout the construction sector.

PxM CG 's occupational safety activities have been honoured five times with the prestigious Gold Charter of Safe Work Leader, for the years: 2018-2019, 2020-2021, 2022-2023, 2024-2025, 2026-2027.

All PxM CG employees are covered by a health and safety management system. In 2025, 27 minor accidents and 1 fatal accident were recorded in the Capital Group.



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Table 43. Accidents in the PxM CG in 2025.

Accidents among employees		2025	2024
Minor accidents		28	35
Serious accidents		0	1
Group accidents		0	0
Fatal accidents		1	0
Total accidents		29	36
Accidents to non-employees		2025	2024
Minor accidents		0	0
Serious accidents		0	0
Group accidents		0	0
Fatal accidents		0	0
Total accidents		0	0
Accidents among employees of subcontractors performing work on the CG site		2025	2024
Minor accidents		9	7
Serious accidents		0	0
Group accidents		0	0
Fatal accidents		0	0
Total accidents		9	7
Other health and safety data		2025	2024
Number of days of incapacity of employees due to accidents at work		1,047	1,545
Number of recognised occupational diseases		7	1
Number of employees		4,459	4,403
Accident rate (number of accidents x 1000.000 / hours worked)		3.73	4.86

S1-15 Work-life balance metrics

Table 44. PxM CG 's work-life balance metrics in 2025.

Year	Female	Male	Other	Not disclosed	Total
	% of employees entitled to take family-related leave				
2025	100%	100%	0%	0%	100%
2024	100%	100%	0%	0%	100%
	% of employees who took family-related leave				
2025	38%	21%	0%	0%	24%
2024	39%	21%	0%	0%	24%
	NUMBER of employees who have taken family-related leave				
2025	261	789	0	0	1,050
2024	261	800	0	0	1,061

Family-related leave includes maternity, paternity and parental leave, carer's leave, care of a family member for up to 14 days and care of a child for up to 60 days, as well as childcare leave and care under Article 188.

Due to the wide range of conditions under which an employee becomes entitled to carer's leave, it has been assumed that every employee is entitled to it.



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S1-16 Remuneration metrics (pay gap and total remuneration)

The gender pay gap was calculated as the difference in the average remuneration level between female and male workers, expressed as a percentage of the average remuneration level of male workers.

The pay ratio indicator was calculated as the ratio of the annual total remuneration of the highest-paid person to the median annual total remuneration of all employees, excluding that highest-paid person (Article 97(b)).

Table 45. PxM CG remuneration metrics in 2025.

Average gross hourly wage						
Employees with a contract of employment						
	Year	Women	Men	Pay gap	components: basic salary	
Average gross hourly wage (Full year's basic salary/number of hours worked during the year)	2025	49.91	53.83	7.28%		
	2024	41.00	43.30	5.32%		
Average gross hourly wage + bonuses in PLN						
Employees with a contract of employment						
	Year	Women	Men	Pay gap	components: basic salary awards bonuses allowance other	
Average gross hourly wage including benefits (Full year's basic salary with benefits/number of hours worked during the year with overtime)	2025	59.16	71.37	17.11%		
	2024	48.88	58.30	16.17%		
Annual salary, Median – contract employees						
Annual total remuneration of the unit's top earner	2025	631,687.31			Year	Indicator CEO Pay Ratio
	2024	676,050.35				
Median annual total employee remuneration (excluding top earner)	2025	105,207.26			2025	6.00
	2024	82,675.73			2024	8.18

S1-17 Incidents, complaints and severe human rights impacts

The Capital Group monitors the number of reported complaints relating to mobbing or discrimination. In 2025, no incidents concerning respect for human rights were reported that would violate the principles set out in the UN Guiding Principles on Business and Human Rights, the declaration of the International Labour Organization or the OECD Guidelines for Multinational Enterprises.



ESRS S2 WORKERS IN THE VALUE CHAIN

SBM-2 Interests and views of stakeholders

In 2025, no systematic approach was established for cooperation with workers in the value chain; however, it will be developed with reference to the objectives established by the PxM CG in the Sustainable Development Strategy, described in disclosure S2-5.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the double materiality assessment process, the following material impacts related to workers in the value chain were identified:

- improved worker safety in the value chain through the provision of safe working conditions (positive, potential),
- strengthening relationships with suppliers and Stakeholders by adhering to ethical principles in the supply chain (potential, actual),

and the following risks and opportunities:

- loss of customers and reputation as a result of working with suppliers who do not comply with health, safety and social standards (risk),
- decrease in interest in cooperation from subcontractors as a result of poor working conditions (risk),
- loss of customers and reputation as a result of working with suppliers who do not comply with health, safety and social standards (risk),

The construction sector is characterised by intensive cooperation with subcontractors and suppliers. Cooperation with numerous business partners in various regions requires not only monitoring compliance with labour law, but also promoting the highest standards of employee safety and health protection.

The PxM CG, as a signatory of the Agreement for Safety in Construction Association, undertakes activities aimed at raising the work safety culture on construction sites. This initiative, launched in 2010 by the largest general contractors in Poland, aims to achieve the overarching goal of “Zero accidents” in the construction industry. This means eliminating accidents by identifying and addressing the root causes of hazards.

The nature of the activities of the Capital Group, covering the implementation of construction, industrial and infrastructure projects, requires strict supervision over compliance with OHS rules. Particular attention is paid to minimising the risk of accidents by introducing safety monitoring systems on construction sites and organising regular training for employees and subcontractors. As part of activities in the value chain, the Capital Group also implements supplier audits, which include assessment of compliance with labour standards, including employment conditions, business ethics principles and anti-discrimination measures.

Polimex Mostostal S.A. also promotes educational activities, such as awareness campaigns among employees and business partners to promote safety principles and social responsibility. This makes it possible to raise labour standards in the construction industry and contribute to reducing the number of accidents among value chain workers.

On the other hand, the Capital Group identifies challenges related to the diversity of safety standards in various regions and countries in which it conducts activities. In countries with lower legal requirements in the area of labour protection, it is necessary to apply internal guidelines and procedures that make it possible to maintain consistency with the standards of the Capital Group and international regulations. Non-compliance with these requirements could lead to reputational risks and loss of contracts.



S2-1 Policies related to value chain workers

Code of Conduct for Contractors of the Polimex Mostostal Capital Group

The PxM CG has a Contractor Code of Conduct, the purpose of which is to apply the uniform principles and standards applicable in the PxM CG to all Contractors, both those establishing business relations and those cooperating on an ongoing basis (hereinafter: Contractor) with the PxM CG. The Contractor undertakes to pursue its business objectives with respect for the principles of the rule of law, ethics and human rights, in particular by applying specific rules for treating its own employees and employees in its value chain. The Code applies to all Contractors of the PxM CG, regardless of the nature of the agreement concluded, including suppliers, subcontractors, service providers, advisers, intermediaries and agents.

The Contractor undertakes to conduct its activities ethically and in accordance with applicable laws, in particular by complying with the rules concerning proper treatment of employees set out below:

Compliance with the law

- conducts activities in accordance with legal provisions, both in Poland and in other countries in which it operates,
- is obliged to comply with applicable national laws, industry regulations and international standards for responsible business conduct,
- respects the principles arising from the Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises,
- ensures that its activities comply with current legal requirements and good practices in the areas of ethics, human rights, environmental protection and anti-corruption.

Health and safety

- complies with applicable OHS regulations and the customer's internal standards,
- ensures safe working conditions protecting the health and life of employees and third parties,
- uses appropriate personal protective equipment and ensures its availability,
- ensures that employees are trained in hazards related to the work performed, reports accidents and near-miss events,
- does not allow the presence of alcohol or other substances affecting the ability to work,
- actively promotes work safety.

ESG and sustainable development:

- supports the achievement of the sustainable development objectives of the PxM CG, in particular in the areas of environmental protection, social responsibility and business ethics, acting in accordance with the assumptions of the PxM CG ESG Strategy,
- undertakes to apply the principles of the Code also to its subcontractors and suppliers. It should undertake due diligence measures to reduce social and environmental risks in the supply chain.
- cooperates with the PxM CG in the area of transparency, reporting and improvement of ESG results within a partnership based on responsibility and trust.

Human rights and labour rights

- respects human rights and ensures decent working conditions,
- in the case of employment of minors or persons with disabilities, applies the relevant labour law regulations,
- does not allow forced labour, human trafficking or restriction of employees' freedom,
- does not accept any forms of slavery or child labour, regardless of local legal or cultural conditions.

Equal treatment and counteracting violence

- creates a working environment free from discrimination, mobbing, harassment and violence,
- ensures a culture of mutual respect and equal treatment,



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- ensures equal opportunities in employment and professional development, regardless of gender, age, origin, disability, religion, sexual orientation or other protected characteristics,
- promotes diversity and social inclusion in the workplace, responds to all manifestations of violations of employees' dignity, regardless of their source, and takes corrective and preventive actions.

Reporting breaches

The Contractor and its employees are obliged to report cases of breaches of law, the principles of the Code or other regulations.

They ensure that all activities relating to personal data are carried out in accordance with applicable laws and regulations. As a rule, agreements concluded by the PxM CG contain a clause on the obligation to apply the Code of Conduct for Contractors. By signing the agreement, the contractor confirms that they have read the document and accept its provisions.

The Code of Conduct for Contractors is available on the website in three language versions: <https://www.polimex-mostostal.pl/>

Compliance with international human rights standards

In its activities, the PxM CG is guided by, and requires its contractors to be guided by, the guidelines:

- OECD for Multinational Enterprises,
- UN on business and human rights,
- International Labour Organisation (ILO) – adhering to the principles set out in the eight fundamental conventions of the ILO Declaration.

Furthermore, the Capital Group respects international human rights standards, including:

- The International Bill of Human Rights, which includes the Universal Declaration of Human Rights,
- International Covenant on Civil and Political Rights,
- International Covenant on Economic, Social and Cultural Rights,
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

Responsibility for respecting human and labour rights

The Polimex Mostostal Group has a **Code of Ethics** in force, which forms the foundation of the organisational culture and obliges all Employees and Associates to observe the highest ethical standards. In accordance with its provisions, the PxM CG does not tolerate any form of discrimination, sexual harassment, mobbing or other forms of harassment or abuse of contractors, employees and colleagues. This includes an absolute ban on child labour, forced labour and forced prison labour.

The Code of Ethics applies to all employees and collaborators of the PxM CG, regardless of their position, form of employment or the country in which they perform their duties. Its provisions apply to board members, directors, managers and all employees and associates of PxM CG companies.

At the same time, we also expect the Code of Ethics to be adhered to by all individuals and entities cooperating with PxM CG companies, thus ensuring that our actions comply with the highest standards of social responsibility and business ethics.

S2-2 Processes for engaging with value chain workers about impacts

In 2025, no formalised, systematic approach to cooperation with workers in the value chain functioned in the Polimex Mostostal Capital Group. This area will be developed with reference to the objectives set out in the Sustainable Development Strategy of the Capital Group, described in disclosure [S2-5].

Despite the absence of a comprehensive system of cooperation with workers in the value chain on a broad scale, the Polimex Mostostal Capital Group bases its activities on solid foundations, including compliance with the highest occupational health and safety (OHS) standards and the principles set out in the Code of Ethics. Ensuring safe working conditions, as well as care for the health and well-being of employees, constitute a priority of the activities of the Capital Group. All operations carried out by the PxM CG are conducted in



accordance with applicable laws and industry regulations, including in particular regulations concerning employee safety and health protection.

The Code of Ethics is a key document setting standards of responsible conduct both towards employees and in relations with suppliers, subcontractors and other Stakeholders. The occupational safety management system and the adopted ethical practices are aimed at ensuring respect for the rights of employees – both those employed directly by the Group and those working within the value chain – and at creating a working environment consistent with high standards. The Capital Group strives to further develop activities in this area, including gradually increasing cooperation with workers and partners throughout the entire value chain.

At the same time, the Capital Group established an irregularity reporting channel also available to workers operating in the value chain, described in disclosure [S2-3].

S2-3 Processes to remediate negative impacts and channels for value chain workers to raise concerns

As part of the double materiality assessment (DMA) carried out in relation to the employee area, no material negative impacts on workers in the value chain were identified. This means that, at the stage of identifying impacts, risks and opportunities, no areas were identified that would require the implementation of dedicated remedial mechanisms within the meaning of ESRS S2.

At the same time, the PxM CG maintains functioning mechanisms for reporting irregularities, which enable the identification of potential problems and the undertaking of corrective actions if they occur. These principles are defined, among others, in the Code of Conduct for Contractors of the Polimex Mostostal Capital Group.

In accordance with its provisions, contractors, their employees and other persons cooperating on the basis of civil law contracts are obliged to report cases of breaches of legal provisions, guidelines, the principles of the Code of Conduct and other applicable regulations defining mutual relations. The purpose of this mechanism is to enable appropriate corrective actions to be taken and to prevent potential irregularities.

If it is found that the activities of the Polimex Mostostal Capital Group or entities operating in its value chain may have had a negative impact on workers, appropriate procedures are implemented to identify the causes and ensure proper remedial measures. This approach is based on the principles of transparency, responsibility and dialogue with employees and other Stakeholders, with the aim of effectively resolving reported problems.

The PxM CG treats compliance with employee rights and labour standards as a high-priority area, recognising that every identified breach or potential negative impact requires an immediate response and the implementation of adequate corrective actions.

Reports of breaches may be submitted to the Ethics Committee of the PxM CG via the dedicated email address: etyka@polimex.pl or in writing to the address of PxM's registered office. Details of the whistleblowing rules and the operation of whistleblowing channels are set out in the relevant ESRS disclosure.

S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

Verification and audit of contractors in the ESG area

PxM CG is working to implement a process to audit and verify contractors for ESG compliance. To this end, an ESG survey is being prepared to assess the extent to which business partners are committed to sustainability and adhere to the highest ethical, environmental and occupational safety standards. As part of this questionnaire, it was also examined what share of contractors had calculated their carbon footprint and set targets in this area.

The aim of this exercise is to implement a coherent system for monitoring and managing ESG risks to effectively identify and address potential anomalies across the value chain.

ESG survey

The purpose of conducting the survey among contractors was to collect information on good practices and the readiness of contractors in the ESG area, in particular in the context of identifying and managing environmental, social and ethical risks in the supply chain.



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195 contractors, suppliers and subcontractors, whose total turnover represented 80% of the total value of the Company's purchases made in 2025, were selected to participate in the process. Participants were selected on the basis of the criterion of economic materiality, so that the process would cover entities generating the largest share of the value of purchasing cooperation. 39 completed surveys were received in return, approximately 20%, which indicates the need for further educational and awareness-raising activities among Contractors upstream in the value chain in order to take care of workers working upstream in the value chain.

In subsequent years, it is planned to increase the level of participation by making the ESG survey more mandatory and linking it to the contractor assessment process.

The PxM CG did not become aware of actual negative impacts supply chain workers and therefore did not implement any corrective actions in this area. In the past year, health and safety inspectors have monitored the safety levels of subcontractor employees as much as their own employees on ongoing projects. In the years to come, it is planned to collect data on any health and safety incidents from subcontracting companies, analyse these phenomena and possibly come up with proposals to improve this area if warranted.

Preparation of detailed processes to determine what actions are necessary and appropriate in response to specific actual or potential adverse impacts on value chain workers, description of the approach to taking action in relation to specific significant adverse impacts on value chain workers, and the manner in which the PxM CG can ensure that processes aimed at ensuring the application of corrective measures in the event of significant negative impacts are available and effective in terms of their implementation and results will be possible after strengthening cooperation in the area of ESG with entities cooperating in the value chain and conducting in-depth analyses, which is planned over the next few years.

In connection with the identified material reputational risk for the PxM CG related to persons performing work in the supply chain as subcontractors, additional awareness-raising activities will be implemented for those workers in the value chain, aimed, on the one hand, at self-control in terms of compliance with safety rules and, on the other hand, at reporting any irregularities. Notwithstanding the above, in the event of a crisis situation affecting projects carried out by the Group, all subcontractors are required to cooperate and communicate as agreed.

S2-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Polimex Mostostal Capital Group has taken steps to implement a **comprehensive approach to ESG matters** and adopted an **ESG Strategy** in early 2025. Objectives that address value chain workers matters are indicated below:

OBJECTIVE 5: Ensuring the highest standards of corporate governance at Polimex Mostostal Capital Group

Creating a sustainable supply chain and preventing corruption and actions contrary to the Group's Code of Ethics.

Maintaining a high level of business ethics and quality

- Working to develop a position as a reliable business partner,
- Introducing and developing the highest standards of management,
- Responsible business practices based on key ESG aspects.

Participation of value chain workers in goal definition:

PxM CG has adopted a cascade approach to setting ESG targets, ensuring the active participation of employees of Group companies in defining strategic directions. ESG representatives were appointed in the subsidiaries to act as liaisons between the ESG Strategy team and the staff of their respective units. These representatives collected and communicated the opinions, needs and expectations of employees, so that ESG objectives were tailored to the real challenges and specificities of each unit's operations. This process enabled bottom-up involvement and the creation of a strategy taking into account the perspective of various Stakeholder groups, although workers in the value chain did not directly participate in the process of creating the Strategy and thus establishing objectives.



ESRS G1 GOVERNANCE

GOV-1 The role of the administrative, management and supervisory bodies

A detailed description can be found in ESRS2 [GOV-1].

G1-1 Corporate culture and business conduct policies

Corporate culture in the Polimex Mostostal Capital Group is shaped on the basis of the PxM CG ESG Strategy, the Sustainable Development Policy in the ESG area, the PxM CG Code of Ethics, the Code of Conduct for Contractors, the Compliance Procedure in the PxM CG and related internal regulations concerning anti-corruption, conflicts of interest and standards of cooperation with contractors. These documents define the values, standards of conduct and corporate governance principles applicable to all companies of the PxM CG.

The corporate governance of the PxM CG is based on an extensive system of internal regulations, comprising several dozen policies, procedures, rules and instructions, which together create a coherent framework for ESG management and conducting business in accordance with sustainable development principles. A significant part of these regulations has been presented in the sections concerning the environmental (E) and social (S) areas of this report. This section presents selected documents and mechanisms relating in particular to the principles of ethics, compliance with law and responsible business conduct, which constitute the foundation of corporate governance in the Group.

The organisational culture of the Capital Group is based on the principles of integrity, transparency, responsibility and respect for human rights. The PxM CG adopts a zero-tolerance principle towards corruption, abuses and conflicts of interest, and clearly defines expectations towards employees, associates and business partners in the areas of ethics, compliance with law and responsible business conduct.

An element of building organisational culture is conducting conscious dialogue with various Stakeholder groups. The detailed methods of conducting this dialogue are described in section SBM-2. This applies in particular to cooperation with contractors. The PxM CG makes efforts to ensure that good practices in the area of business activity are transferred to subsequent subcontractors upstream in the value chain. Therefore, in 2025, the Code of Conduct for Contractors was modified, extending ethical, social and environmental standards to the entire supply chain.

Mechanisms for identifying, reporting and investigating breaches of law

The Polimex Mostostal Capital Group has implemented mechanisms for identifying, reporting and investigating concerns regarding conduct inconsistent with legal provisions, the provisions of the PxM CG Code of Ethics or other applicable internal regulations. These mechanisms are defined in particular in the PxM CG Code of Ethics, the Regulatory Compliance Policy in the PxM CG and the Policy on reporting information on breaches of law and taking follow-up actions.

Reports may concern in particular breaches of legal provisions, corrupt practices, conflicts of interest, breaches of fair competition principles, irregularities in relations with contractors, violations of employee rights, as well as other actions contrary to applicable ethical standards.

The possibility of submitting reports is available to both internal and external Stakeholders, in particular employees, associates, contractors, suppliers and other persons who have obtained information about potential breaches in a context related to the activities of the PxM CG.

Anti-corruption and anti-bribery policy

Anti-corruption principles are also communicated to contractors and business partners, who are expected to comply with comparable ethical standards in business relations with the PxM CG.

The Polimex Mostostal Capital Group has a separate Anti-Corruption Policy regulating the principles of preventing corruption and bribery in the PxM CG. These principles have additionally been included and developed in the PxM CG Code of Ethics and related internal regulations. The applicable regulations are consistent

with international anti-corruption standards, including the principles arising from the United Nations Convention against Corruption (UNCAC).



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The PxM CG Anti-Corruption Policy applies to all employees, associates, members of the bodies of the Companies from the Capital Group and other persons acting on behalf of or for the benefit of the PxM CG. It covers in particular the prohibition of offering, giving, accepting or requesting any financial or personal benefits, both directly and indirectly, as well as actions aimed at preventing conflicts of interest and other abuses that may affect the impartiality of decision-making processes and business relations.

The anti-corruption principles applicable in the Capital Group are also communicated to contractors and business partners, who are expected to comply with comparable ethical standards in business relations with the PxM CG.

Whistleblower protection and breach reporting channels

The Polimex Mostostal Capital Group has implemented a Policy on reporting information on breaches of law and taking follow-up actions, which provides safe, confidential and accessible channels for reporting irregularities. The functioning channels enable reports to be made while maintaining the confidentiality of the identity of the whistleblower, the persons concerned by the report and third parties, in accordance with applicable laws.

The internal channels for reporting irregularities may be used by employees and other persons obtaining information about breaches in a context related to the activities of the Capital Group. Information on the available reporting mechanisms is communicated to employees through internal communication and as part of training activities.

The PxM CG provides protection to persons making reports in good faith against retaliation, in accordance with national laws implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

Reports are verified and investigated by designated organisational units, in compliance with the principles of confidentiality, impartiality and due diligence. Whistleblowers receive feedback on the follow-up actions taken within the scope and time limits permitted under applicable laws.

Procedures for investigating incidents related to business conduct

The Polimex Mostostal Capital Group has implemented internal regulations enabling the prompt, independent and objective identification, reporting and investigation of incidents related to business conduct, including incidents concerning corruption, bribery, conflicts of interest and other breaches of applicable ethical principles or legal provisions.

Explanatory proceedings are conducted within the specialised and authorised organisational units functioning in the Capital Group.

Animal welfare policy

The activities of the PxM CG do not include areas in which animal welfare matters would constitute a material aspect of conducting business. Accordingly, the Capital Group does not have a separate internal regulation on animal welfare.

Training on business conduct

The Polimex Mostostal Capital Group conducts internal training on business conduct, covering in particular anti-corruption and anti-bribery matters, ethical principles and requirements arising from the compliance system functioning in the Capital Group. Training constitutes an integral element of the compliance management system and is addressed to employees and persons holding positions exposed to an increased risk of corruption.

Participation in training is mandatory for the indicated groups of employees. The substantive scope and frequency of training are periodically verified and updated on the basis of the results of corruption risk assessment, conclusions from compliance activities and changes in applicable laws and internal regulations.



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Functions most exposed to the risk of corruption

Based on the corruption risk assessment in the PxM CG, organisational functions particularly exposed to the risk of corruption and bribery were identified. These include in particular positions related to:

- public and commercial procurement,
- purchasing processes,
- selection of suppliers and subcontractors,
- project implementation and supervision,
- relations with contractors.

The identification of these functions forms the basis for implementing preventive measures, including training, control mechanisms and risk monitoring within the compliance system.

Reporting of violations, including incidents of corruption and bribery.

Polimex Mostostal Capital Group Code of Ethics provides for the possibility of reporting abuses or irregularities in a manner convenient to the reporter:

- Notification to immediate superior
- Report to the Ethics Committee either anonymously or with details of the reporter:
 - e-mail: etyka@polimex.pl
 - to the following postal address:
Polimex Mostostal S.A.
Ethics Committee
al. Jana Pawła 12, 00-124 Warsaw
 - via the form at polimex-mostostal.pl/whistleblowing,
- Report to the Audit and Control Office:
 - to the Office Director's e-mail address,
 - via the form at polimex-mostostal.pl/whistleblowing,
- Report to the President of the Management Board of Polimex Mostostal S.A.:
 - to the President's e-mail address,
 - via the form at polimex-mostostal.pl/whistleblowing.

Pursuant to **Code of Conduct for Polimex Mostostal Capital Group Contractors**, the Contractor and its employees, as well as other persons cooperating with the Contractor on the basis of civil law contracts, are obliged to report cases of violations of regulations, guidelines, principles of the Code of Conduct for Polimex Mostostal Capital Group Contractors and other binding regulations defining mutual relations so that appropriate action can be taken. The contractor and its employees may report violations to the PxM CG Ethics Committee at the following e-mail address: etyka@polimex.pl

According to the "Policy for reporting information on violations of the law and taking follow-up action", there are two procedures for reporting violations in the Polimex Mostostal Group, an internal procedure and an external procedure.

Internal whistleblowing procedure

The entity authorised to receive a report containing information on a violation of the law in the context related to work in the Polimex Mostostal Capital Group is: the Director of the Legal and Corporate Governance Office being the central unit receiving reports referred to in the Policy. In the absence of the director, the entity authorised to receive applications is PxM's Compliance Business Partner. These persons are at the same time the entities following up on the report, including verification of the report and further communication with the whistleblower, including requesting additional information and providing feedback to the whistleblower.



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If, after verification of the notification, it is found that it requires an internal corporate investigation, the unit responsible for this is the PxM Audit and Control Office, in cooperation with the Legal and Corporate Governance Office.

If a whistleblower becomes aware of a violation of the law in a work-related context, the whistleblower shall make a report through the internal reporting channels operating in the Polimex Mostostal Group. The PxM CG has designed, established and operated ways to report violations of the law in a work-related context that ensure that the confidentiality of the identity of the whistleblower, the person to whom the report relates, the person helping to make the report, the person associated with the whistleblower is protected and that unauthorised persons cannot gain access to them:

- whistleblower form available on the PxM CG website: Form for reporting irregularities | Polimex Mostostal S.A. (polimexmostostal.pl);
- possibility of a face-to-face meeting with the unit responsible for receiving the report. Oral notification may be made at a face-to-face meeting organised within 14 days of receipt of such a request from the whistleblower;
- telephone number: +48 695-163-879.

External whistleblowing procedure

A whistleblower may make an external report without first making an internal report to the Ombudsman or a public body and in accordance with the rules set out in the Act. The reporting of infringements of the law through external reporting channels is carried out through the authorities competent under the law to receive, feedback on and follow up on reports.

Protection of whistleblowers

The Company, acting in accordance with the Law of 14 June 2024 on the protection of whistleblowers and the implemented Policy for reporting information on violations of the law and taking follow-up action, ensures full confidentiality of reports, respecting privacy and the protection of personal data. As part of the procedures adopted, anonymous whistleblowing channels have been made available, allowing concerns and needs to be communicated securely by affected communities. The company is committed to comprehensive protection for whistleblowers, ensuring their safety, protection from retaliation and appropriate remedial action in both the public and private sectors.

G1-2 Management of relationships with suppliers

The Polimex Mostostal Capital Group conducts and expands its business activities by striving to achieve a balance between economics, ethics and respect for the natural environment. PxM CG 's business activities are guided by legal standards, high ethical standards, building partnerships with customers, employees and the socio-economic environment.

Partnership relations with suppliers are very important for the Capital Group. The formation of long-term and secure relationships with suppliers is based on cooperation and dialogue. An important first step in supplier relations was to identify the risks and opportunities involved.

The most significant risks involving supplier and business partner issues are those that could result in disruptions to supply chains, loss of liquidity, loss of Capital Group credibility and additional costs to be incurred due to late payments and loss of business partners.

In contrast, opportunities related to supplier and business partner activities are associated with partnerships with the best industry suppliers, access to the best quality components, attractive payment terms, a flexible supply chain.

Contractors of the Polimex Mostostal Capital Group are obliged to pursue their business objectives with respect for the rule of law, ethics and human rights, in particular by applying the basic principles of conduct set out in the **Code of Conduct for Capital Group Contractors**. The purpose of the Code is to apply uniform principles and standards applicable in the PxM CG to all Contractors, both those establishing business relations and those permanently cooperating with the Polimex Mostostal Capital Group. The Code of Conduct for Contractors is



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based on the core values and principles of the Polimex Mostostal Group. The Code contains regulations on anti-corruption policy.

Polimex Mostostal Capital Group shapes its relationships with its counterparties in accordance with the principles of corporate culture. Detailed rules for the selection of contractors are described in the **Procurement Procedure in the Polimex Mostostal Group**, which defines the procedure for the purchase of materials and services in accordance with technical and technological assumptions, ensuring the required quality and maintaining economic efficiency. It is planned to increase the importance of sustainability in the selection of subcontractors and suppliers.

In the area of settling liabilities, the Capital Group adheres to the contractual provisions found in its individual contracts with suppliers

Polimex Mostostal Group does not have a policy aimed at preventing payment delays.

G1-3 Prevention and detection of corruption and bribery

The PxM CG has applicable procedures for preventing, detecting and responding to corruption and bribery, including in particular the Anti-Corruption Policy, the Regulatory Compliance Policy and the Policy on reporting breaches of law, which establish the zero-tolerance principle, risk assessment and secure reporting channels. Reports are verified by independent and impartial units, i.e. compliance, the Audit and Control Office and the Security Office, and the results of proceedings form the basis for corrective and preventive actions.

In the Polimex Mostostal Capital Group, the bodies competent to verify and investigate cases of corruption and bribery are the Audit and Control Office, the Security Office and the PxM CG Ethics Committee, which function independently of the operational management involved in preventing and detecting these risks, ensuring the objectivity and impartiality of proceedings conducted.

The results of explanatory proceedings and findings concerning corruption-related breaches are reported in accordance with applicable procedures to the relevant management and supervisory bodies, including to the Management Board of the PxM CG and, in respect of material matters, to the Audit Committee of the Supervisory Board, while maintaining the principles of confidentiality, whistleblower protection and personal data protection regulations.

In the PxM CG, policies concerning the prevention and detection of corruption and bribery are communicated to persons for whom they are relevant through internal communication channels, in particular by publishing regulations on the intranet and through formal organisational communication. In addition, these principles are disseminated as part of internal training, in particular addressed to employees and functions with increased corruption risk, which ensures their understanding and practical application in the activities of the PxM CG.

In the PxM CG, training programmes offered and required in the area of anti-corruption and anti-bribery are systemic and preventive in nature and constitute an element of implementing the Anti-Corruption Policy and the compliance system. The training covers in particular principles of ethical conduct, identification of corruption risks, conflicts of interest, permitted and prohibited practices in business relations and mechanisms for reporting irregularities, with their scope and level of detail adapted to the risk profile of a given position.

Training programmes are addressed in particular to employees and functions exposed to increased corruption risk, including purchasing, public procurement, projects and relations with contractors, are cyclically updated on the basis of corruption risk assessment and conclusions from audits and explanatory proceedings, and their implementation is documented.

All employees (irrespective of the form of employment) of Polimex Mostostal Capital Group are obliged to familiarise themselves with the anti-corruption principles applicable to Polimex Mostostal Capital Group indicated in the Code of Ethics of Polimex Mostostal Capital Group. Reporting of violations of the Code of Ethics or any other irregularities can be done via electronic correspondence, to the e-mail addresses indicated in the Code or via the form available on the website polimex-mostostal.pl/whistleblowing.

G1-4 Incidents of corruption or bribery

In 2025, no confirmed cases of corruption or bribery were identified in the Polimex Mostostal Capital Group. None of the employees of the PxM CG was convicted by a final and binding judgment for actions



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of a corrupt nature, and the Capital Group did not incur any penalties or financial sanctions related to such events.

In the reporting period, the Polimex Mostostal Capital Group did not record:

- incidents of corruption or bribery, including cases where its own employees have been dismissed or punished for incidents of corruption or bribery,
- incidents related to contracts with business partners that were terminated or not renewed due to breaches related to corruption or bribery.
-

G1-5 Political influence and lobbying activities

Supervision over the entire area of compliance (including ensuring compliance of lobbying activities) is exercised by the President of the Management Board, although the Company does not engage in lobbying activities.

The Capital Group did not make financial or in-kind political contributions. The policy of sponsorship activities and donations excludes such activities in the company and the Polimex Mostostal Group.

Polimex Mostostal S.A. or Polimex Mostostal Capital Group companies are members of the following organisations.

Main organisations:

- Chamber of Commerce for Energy and the Environment (IGEOŚ),
- Polish Association of Construction Industry Employers (PZPB)
- Agreement for Safety in Construction,
- Polish Association of Listed Companies (SEG)
- PZPB Atom
- Polish Chamber of Chemical Industry (PIPC) – Naftoremont-Naftobudowa
- Polish Chamber of Steelworks (PIKS) – Mostostal Siedlce
- Polish Galvanizing Society (PTC) – Mostostal Siedlce
- “Polish Road Congress” Association – Polimex Infrastruktura
- Eastern Chamber of Commerce – Mostostal Siedlce
- IBU Institut Bauen und Umwelt e.V. – Mostostal Siedlce – Mostostal Siedlce

Information on representatives responsible on the management and supervisory bodies for overseeing political influence and lobbying activities.

There was no situation in the Capital Group where members of administrative, management and supervisory bodies were appointed who had held comparable positions in public administration in the two years preceding their appointment.

G1-6 Payment practices

Polimex Mostostal Group pays particular attention to timely payments in accordance with the Act on Counteracting Excessive Delays in Commercial Transactions. By observing established payment deadlines, the Capital Group builds trust in relations with suppliers.

Disclosure of indirect information on payment practices.

All suppliers are provided with clear information on payment terms and settlement procedures. We also provide a clear procedure for returning goods or services. Contracts with contractors generally include a payment period of 30-60 days. In individual cases, the payment period is reduced to 14 or 21 days. For some suppliers, the payment period is more than 60 days, but not more than 90 days.

Polimex Mostostal Capital Group has a secure and comprehensive invoice circulation system in place, which, in conjunction with the ERP system and the contract recording system, enables an efficient and reliable document circulation process, including accounting documents, the invoice acceptance process and the recording of accounting documents.



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While maintaining the principles of integrity and security, Polimex Mostostal Capital Group to simplify the circulation of invoices within the organisation (digitalisation). This minimises the risk of a bottleneck in the transmission of financial documents for posting and, consequently, the inability to pay on time (for documents with short payment terms).

The average number of days to pay an invoice in the Group from the date of commencement of the contractual or statutory payment period is 40 days.

Description of standard terms of payment of liabilities by main categories of suppliers.

In the Group for non-commercial goods within the meaning of the EU Commission Regulation No. 651/2014 of 17 June 2014 for: micro, small and medium-sized enterprises – the maximum possible payment term is 60 days; large enterprises – maximum 90 days.

Table 46. Percentage share of individual payment term ranges in the Polimex Mostostal Capital Group in 2025.

	2025	2024
Up to 14 days	14%	15%
Between 15 and 30 days	30%	38%
Between 31 and 60 days	50%	44%
over 60 days	6%	3%

In 2025, nearly 81% of payments for deliveries and services in the Capital Group were made in accordance with standard payment terms or with a delay not exceeding 7 days.

As at 31 December 2025, 28 legal proceedings concerning disputes were pending in the Capital Group.

The Management Board of Polimex Mostostal S.A.

Warsaw, 24 April 2026

Name and surname	Position / Function	Signature
Jakub Stypuła	President of the Management Board	
Marzena Hebda – Sztandkie	Vice President of the Management Board for Finance	
Mirosław Sołtysiak	Vice President of the Management Board for Operations	

