RE ALLOYS
RENEWABLE ENERGY ALLOYS

ESG Report

2023

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RENEWABLE ENERGY ALLOYS

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Re Alloys in 2023

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1.1.

Foreword

All our actions are driven by intragenerational solidarity; therefore, we build our value on the foundations of sustainable development, respect for our employees, local communities, and natural environment. To meet our stakeholders' expectations, we support the initiative of a non-financial reporting.

We are glad to publish this ESG report of Re Alloys sp. z o.o. for 2023.

CEO's foreword

Ladies and Gentlemen,

I am proud to share with you our achievements and development plans in the areas of environmental responsibility, social responsibility, and corporate governance. Our company, aware of global challenges such as high electricity prices and the increasing demands of the European Union's climate policy, is making strategic decisions that impact the sustainable development of our organisation and the entire sector.

The European Union's climate policy, with its stringent CO_2 emission reduction targets, demands that businesses commit to sustainable development like never before. Re Alloys actively supports these initiatives, being convinced that the green transformation is not only a response to global ecological challenges but also a strategy ensuring long-term stability and growth.

Our response to climate challenges is the Re Alloys Going Green strategy, which has been implemented over the past few years. Its primary goal is to achieve zero emissions while completely eliminating dependence on energy price fluctuations. Fully covering our energy needs with renewable energy sources (RES) will allow us to reduce CO_2 emissions on a scale equivalent to the emissions of a city with several hundred thousand inhabitants. We achieve our goals by progressively increasing the share of renewable energy sources, investing in RES technologies with a particular focus on the construction of wind and photovoltaic farms, as well as modernising furnace facilities and investing in technologies for energy recovery from furnaces.

The year 2023 marks a period of intensive implementation of the Re Alloys Going Green strategy. The construction process of our first wind farm, which we started in 2023, is proceeding according to the planned schedule. As part of this investment, we have achieved important milestones, resulting in the installation of 10 wind turbines with a capacity of 35 MW in Dzwola, which will power our plant with green electricity by the end of 2024.

One of the most significant undertakings in 2023 was the submission of an application for funding for an innovative project. Its goal is to develop technology for utilising by-products of the ferrosilicon production process while ensuring a zero-emission source of electricity. We were pleased to hear that Re Alloys received funding of over PLN 61 million. This will allow us to build a 39 MWp photovoltaic farm in Dzwola, where our wind farm is currently under construction.

As part of our renewable energy development strategy, we decided to expand our internal department dedicated to this field. A specialised team was established to implement a comprehensive action programme aimed at accelerating Re Alloys' achievement of net-zero emissions. We have also commenced work on expanding existing production units with energy recovery installations from the furnaces.

In recent years, Re Alloys has focused significantly on improving health and safety standards for employees, which is a crucial element of our sustainable development strategy. Investments in modern medical equipment and the establishment of an on-site medical care facility are concrete steps we have taken to ensure our employees have access to the best possible healthcare. Additionally, we have conducted numerous first aid training sessions, which not only increase safety but also enhance the awareness and skills of our staff in emergency situations.

To sum up, I would like to emphasise that Re Alloys' achievements are a direct result of the commitment and hard work of the entire team. Taking this opportunity, I would like to thank all the Re Alloys staff for their invaluable contribution to the company's development.

With best regards,
Mirosław Wilczek
Management Board President

1.2.

2023 at Re Alloys

The year 2023 is a time of intensive work on implementing Re Alloys' development strategy, with the primary goal of achieving zero emissions. By executing the Re Alloys Going Green strategy, we are not only contributing to the reduction of CO_2 emissions but also creating green solutions for future generations.

Implementing the **Re Alloys Going Green** strategy involves executing strategic investments as well as a range of other actions and initiatives. The key projects focus on investments in renewable energy sources and waste heat recovery, which significantly reduce dependence on fossil fuels. Moreover, Re Alloys is working on improving energy efficiency in its production processes, which also contributes to the reduction of CO_2 emissions.

The Going Green strategy carried out by Re Alloys is multifaceted and includes a series of actions that go beyond technology and investments in eco-friendly solutions. The company not only focuses on innovations and energy efficiency but also places great importance on education and supporting local communities in implementing ecological initiatives.

Re Alloys supports local environmental projects, such as reforestation initiatives and green space clean-ups. Through these actions, Re Alloys contributes to improving the state of the environment and builds positive relationships with local communities, which in turn leads to a better understanding of the company's ecological goals.

The Going Green strategy reflects Re Alloys' commitment to combating climate change, contributing to the creation of a better future for future generations.

Re Alloys Sp. z o.o. is implementing the"Going Green" strategy through strategic investments in various areas, including:

1. Renewable energy sources (RES):

- Re Alloys Sp. z o.o. is investing in the construction of a 35 MW wind farm in the Dzwola municipality, which serves as a key starting element of the"Going Green" strategy.
- The planned commissioning of the wind farm is scheduled for the end of 2024, enabling the company to utilise its own renewable energy sources to meet its energy needs.
- In 2023, Re Alloys decided to initiate the process of developing its own renewable energy farms. The project team was expanded to include"scouts" responsible for analysing and verifying sites for renewable energy investments.
- After submitting an application to the SMART Path competition under FENG.01.01-IP.01-001/23, Re Alloys will receive funding of over PLN 50 million for the construction of a 39 MWp photovoltaic farm in the Dzwola municipality, where the commissioning of the 35 MW wind farm is currently underway. The project will be implemented using"cable pooling" to maximise the use of the existing grid connection

2. Modernisation of the 110 kV power grid:

- The company plans to modernise the 110 kV power grid to ensure stability and support the development of the ferroalloy production plant.

3. Energy recovery from waste heat:

- Re Alloys intends to recover energy from the waste heat generated by submerged arc furnaces (SAF), marking another step towards sustainable development and efficient use of energy resources.

These actions enable Re Alloys Sp. z o.o. to efficiently produce high-quality products using innovative, environmentally friendly technologies, which is a crucial element of our mission.

Summary of the Re Alloys Going Green Strategy

SPV Wind Farm Łada Sp. z o.o.

The investment kicked off in full swing in January 2023, with the first entries made in construction logbooks (a total of 14 construction logbooks: 10 for wind turbines, GCP, medium voltage cable line, medium voltage in the DK74 road corridor, and the construction of access roads to the wind power plants).

The project timeline and progress according to the project milestones have been defined through the following agreements:

- GCA (Grid Connection Agreement) – the agreement signed with PGE Rzeszów S.A.;
- BOP (Balance of Plant) – the construction, civil, and electrical scope with ONDE S.A.;
- TSA (Turbine Supply Agreement) – the agreement for the supply, installation, and commissioning of wind turbines with Nordex Polska Sp. z o.o.;
- PPA (Power Purchase Agreement) – the agreement for the purchase of electricity from a renewable energy source (RES).

As illustrated by the following timeline, the key milestones achieved according to the planned investment schedule were:

I.2023 – Commencement of construction
Handover of the construction site to the General Contractor.

IV.2023
Delivery of anchor cages to the FW Dzwola construction site.

V.2023
Commencement of laying foundations for 10 turbines.

IX.2023
Completion of laying foundation for 10 turbines, with piling required for 5 of them.

X.2023
Commencement of wind turbine installation.

XI.2023
Connection of the GCP Dzwola building to the busbars of the main transformer station.

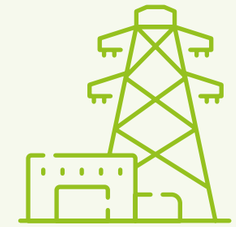
XII.2023
Completion of wind turbine installation.

Waste heat energy recovery system

After conducting a multi-variant analysis and developing a feasibility study in 2022, we are currently analysing the investment's profitability in relation to verifying the possibility of obtaining funding from available national and EU programs such as NCBiR [the National Centre for Research and Development in Poland], NFOŚiGW [the National Fund for Environmental Protection and Water Management], EIT, and EIB. To this end, we have established cooperation with external consulting firms.

Modernisation of the plant 100KV network and connection to the PSE grid

In 2023, the multi-variant feasibility study for this project was completed. Currently, the investment's profitability is being assessed. An application has been submitted for the issuance of grid connection conditions to the PSE (Polskie Sieci Elektroenergetyczne – Polish Power Grid).



PLANS FOR 2024

1. Launching, commissioning, and obtaining a generation licence for the 35 MW Dzwola wind farm.
2. Development of a 35 MW photovoltaic farm in Dzwola using "cable pooling" to optimise the use of the existing grid connection.
3. Development of own renewable energy farms as part of the continuation of the Going Green strategy.
4. Obtaining grid connection conditions from PSE for the development of 110 kV infrastructure at Re Alloys.

1.3.
Our activity

Re Alloys is a ferroalloys producer who is trusted and appreciated in the industry. Thanks to a highly-qualified technical and management staff knowing the ferroalloys market and the production processes, Re Alloys has been a renowned ferroalloys producer in the region for many years.

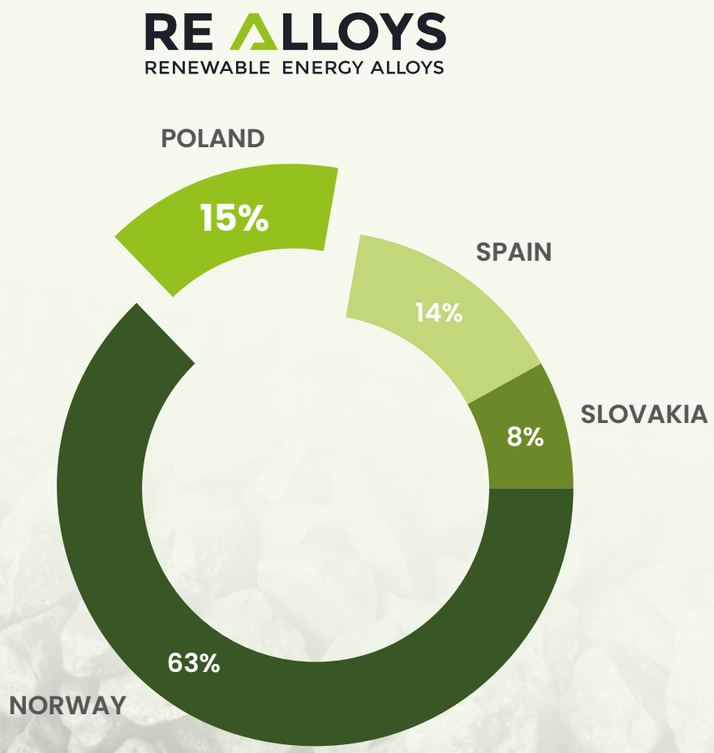
Re Alloys is part of the Luma Holding Capital Group associating companies of the Metallurgical Industry, Automotive branch, also investing by the venture capital financing. Luma Holding invests in companies with global ambitions located in Poland, CEE region, and in Central and East Africa.

The core objective of the company is production of ferroalloys based on silicon, mainly in a form of various types of ferrosilicon. Yearly, Re Alloys produces 80,000 tonnes of this product, that is approx. 15% of the whole European production. The share in German, Italian, and Austrian markets amounts to 30%. The company's products are being sold on the markets across almost the entire Europe.

One of the directions of the Re Alloys' operation is the production of niche ferroalloys of high purity and special chemical composition to be used in high technology industries.

The plant uses innovative solutions that are effective and environmentally friendly. The main recipients of the Re Alloys offer are steel producers, automotive, arms, and aviation industries.

Share in ferrosilicon production of the leading European producers



1.4.

Mission and vision

We believe that responsible management is of great significance when it comes to sustainable development of an enterprise. Being a producer and a supplier of key products for many sectors of the industry, we conduct our business consciously and devotedly, especially in the field of our influence on the natural environment and social responsibility.

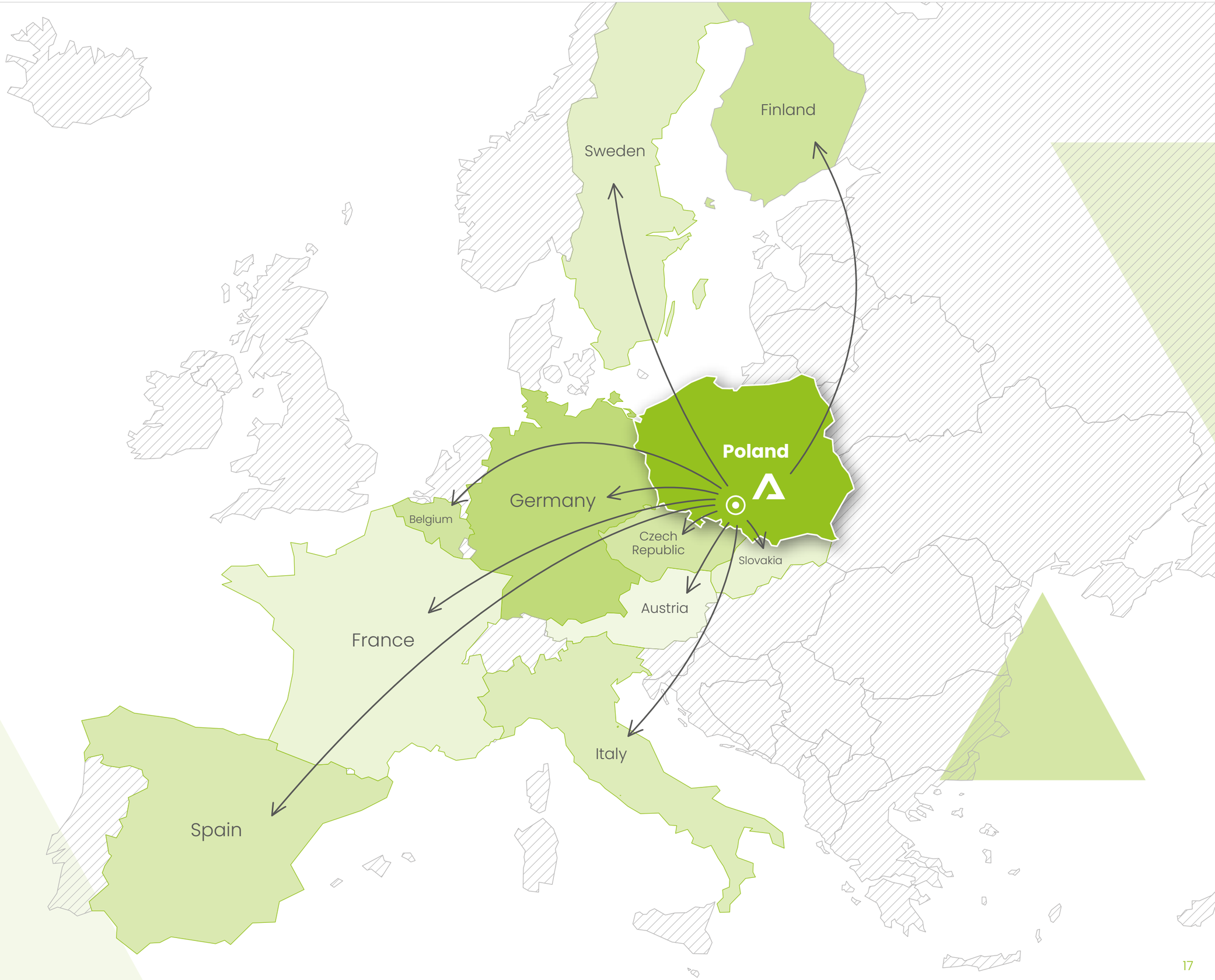
Re Alloys **MISSION**

Efficient manufacturing of top-quality products with the use of innovative environmentally friendly technologies

Re Alloys **VISION**

High-performance, zero-emission production of top quality ferroalloys providing a stable position on the demanding European market.

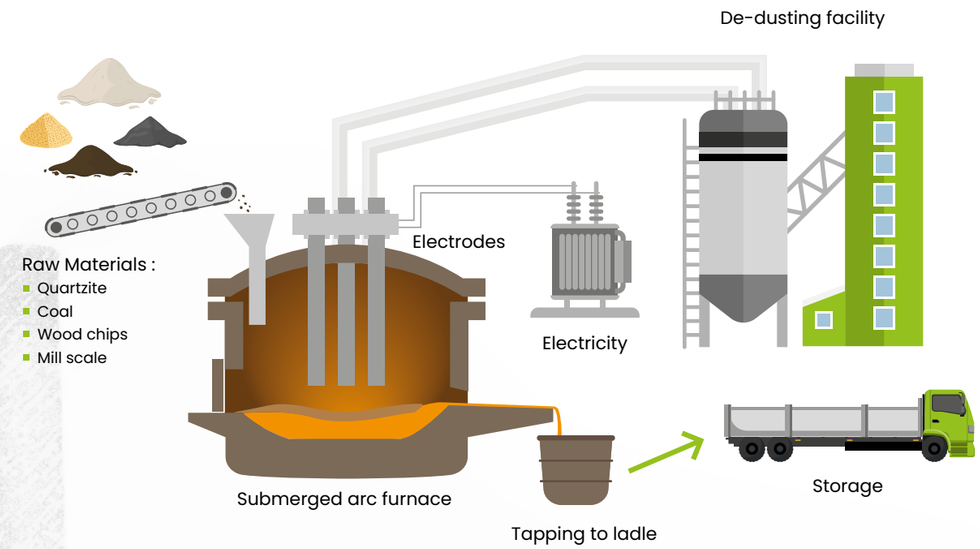
Main Customers



Ferroalloys producer with a long-established tradition

The tradition of ferroalloys smelting in Łaziska Górne dates back to the beginning of the 20th century. In 1916, on the initiative of Prince Hans Heinrich XV Hochberg, the "Elektro" plants were established, comprising an energy division and a metallurgical division that produced carbide for the needs of nearby coal mines. After World War II, the metallurgical part was separated and began operating as the "Łaziska" Smelter, which was transformed into a joint-stock company in the 1990s. To accelerate technical development and production modernisation, Re Alloys sp. z o.o. [limited liability company] was established in 2001.

Re Alloys, as a producer of ferroalloys, operates 13 resistance-arc furnaces of the open or semi-closed, low-shaft furnace type, located in four furnace buildings. The furnace units vary in size, transformer power, number of electrodes, and intended use. Ferroalloys furnaces power is defined by the power of supplying transformers. The company's furnace units power ranges from 2 to 20 MVA.



ROOTS

1916 Commencing the construction of the power plant and electrothermal smelter, on the initiative of John Henry XV Hochberg, in Łaziska Górne, to meet the demand for carbide of the nearby mines

1920 Launch of ferroalloys production for the Polish steel industry

RESTRUCTURING

1997 Transformation of a state enterprise into a public limited-liability company, which since 1999 has been a part of today's Re Alloys

1999 **Establishing of Re Alloys** in order to accelerate the development and production modernisation

2001

INNOVATION

2014 Starting of a regular R&D process which led to a few patents for processes and products

CONTINUOUS DEVELOPMENT

2020 **Investment in projects** aiming at reduction of CO_2 emission

2025 **Re Alloys powered in 100% from zero-emission energy sources**

R&D

Re Alloys aims at employing cutting-edge technologies, implementation of innovative projects, and constant searching for effective methods and technological improvements, that is why the company cooperates with scientific centres and pursues the presented investment goals with their support. What needs to be mentioned is the cooperation with the Silesian University of Technology, the AGH University of Science and Technology in Cracow, the Częstochowa University of Technology, the Opole University of Technology, the Institute of Metallurgy in Gliwice, and the Central Mining Institute in Katowice.

Apart from the production activity, Re Alloys also implements projects with NCBiR [the National Centre for Research and Development in Poland] subsidies.

NCBR National Centre for Research and Development

R&D PROJECTS implemented from 2016 to 2023,

co-financed by EU funds.

6 **projects completed** under the Smart Growth programme

European Funds Smart Growth | Republic of Poland | RE ALLOYS RENEWABLE ENERGY ALLOYS | European Union European Regional Development Fund

1 **project currently being implemented** under the Modern Economy programme

2 **planned projects** under the Modern Economy programme

European Funds for Smart Economy | Republic of Poland | Co-Funded by the European Union

RE ALLOYS
as a recipient of the EU funds

PLN 283 million
R&D project value

PLN 131 million
granted EU subsidies

Long-standing cooperation with scientific centres

Silesian University of Technology | AGH | POLITECHNIKA Częstochowa University of Technology | OPOLE UNIVERSITY OF TECHNOLOGY | Łukasiewicz Industrial Research Institute for Automation and Measurements PIAP | GIG National Research Institute

UNDER IMPLEMENTATION

Development of a technology for effective use of subgrain in the production process of high-grade silicon and iron alloys (FeSi) along with providing zero-emission energy resource (RES) for this process.

The project objective is to develop and carry out tests in industrial conditions of an innovative technology consisting of full management of the ferrosilicon (FeSi) production process by-products along with providing zero-emission electricity for the process in order to reduce the carbon footprint in the conditions of the industrial use of the above technology.

IMPLEMENTED at their duration period

Development and implementation of the innovative, integrated steering algorithm for the high-content silicon alloys production process in electric, arc-resistance furnaces of the furnace building IV on the basis of on holistic control system of process parameters.

The project objective was to develop and implement to the industry an integrated steering algorithm for the high-content silicon alloys smelting in electric arc resistance furnaces. Thanks to R&D works and the deploying innovative process solutions, it is possible to reduce energy consumption and at the same time to increase the yield of basic element, Si, what translates into reduction of basic product manufacturing costs and increase in production volume, and thus into improvement of the plant's competitiveness.

Crosimax – an innovative alloy of silicon with chromium, iron, aluminium, and calcium, as a versatile and effective reducing agent of increased deoxidising potential towards Cr_2O_3 – to be applied in manufacturing of low and ultra-low carbon grades of ferro-chromium.

The project objective was to manufacture an innovative product – the Crosimax alloy – of the minimum Si content of 60%, Cr min. 21%, Al max. 4%, max. Ca – 2%, max. C – 0.02% and the Cr/Fe ratio min. 2, a product which is not produced anywhere else in the world now.

Innovative production technology of ferrosilicon of silicon content of minimum 75% and ultra-law carbon content max. 0.02%.

The project objective was to obtain a new product in the country, namely a high-content alloy of iron and silicon, FeSi, of particularly low carbon content (below 0.02%) produced with the use of energy-efficient and low-loss production technology developed in industrial conditions.

COMPLETED

Development of innovative technology for the production of iron, silicon and aluminium alloys based on industrial waste, in particular from mining.

The project objective was to develop a production technology for new ferroalloys with silicon and aluminium on the basis of industrial wastes, especially from mining, a technology enabling production of alloy of 5-20% Al content.

Refined, ultra-pure ferro-silico-chromium with controlled content of carbon, nitrogen, oxygen and hydrogen

The project objective was to carry out development works on ferro-silico-chromium FeSiCr and to use the results for manufacturing a product of quality achieved nowhere in the world, i.e., an alloy of the carbon content of less than 0.02% by weight, phosphorus – less than 0.02, nitrogen – less than 0.02%, hydrogen – less than 0.03%, oxygen – less than 0.4%, and sulphur – less than 0.01%.

ABANDONED at their duration period

Maximisation of energy efficiency in a six-electrode electric arc resistance furnace for high-content silicon alloys by developing innovative solutions, especially for the furnace power supply system.

The project objective was to develop and implement to the industry an improved energy efficient technology for high-content silicon alloys smelting at the production line of a six-electrode electric arc resistance furnace equipped with an innovative power supply system.

R&D projects are implemented and monitored based on **"Guidelines concerning eligibility of expenditures under the European Regional Development Fund, the European Social Fund, and the Cohesion Fund for 2014-2020"**, also on internal regulations and procedures adopted at Re Alloys.

The Intermediary Institution (i.e., the National Centre for Research and Development), over the period of the project implementation, also over the project durability, requires from the Beneficiary, among others:

- Monitoring and achievement of the assumed objectives and indicators specified in the EU grant application, including indicators confirming positive effects on implementation of the principle of sustainable development.
- Presentation of interim reports on implementation of the Project with consideration of a detailed analysis of the conducted industrial researches, development works or pre-implementation works, Technology Readiness Level analysis and contribution to achievement of the Project's indicators.
- In case the Project includes pre-implementation works, there is an additional report to be submitted after the completion of the research part of the Project.
- Implementation of the full material scope of the Project and implementation of the industrial research and development works results within three years after the end of the Project
- Report to the Intermediary Institution on implementation of the industrial research and development works results
- Submission of information on social and economic effect of the implementation
- Sharing and broad distribution of the industrial research and development works results, or development works, to all entities interested in using those results gratuitously, with the equal access principle.
- Report on distribution of the industrial research and development works results, or development works.
- Report on research and development activities for previous year (R&D report) to the Polish Central Statistical Office and the Intermediary Institution.

NCBR
National Centre for Research and Development

Production Process

Raw materials storage

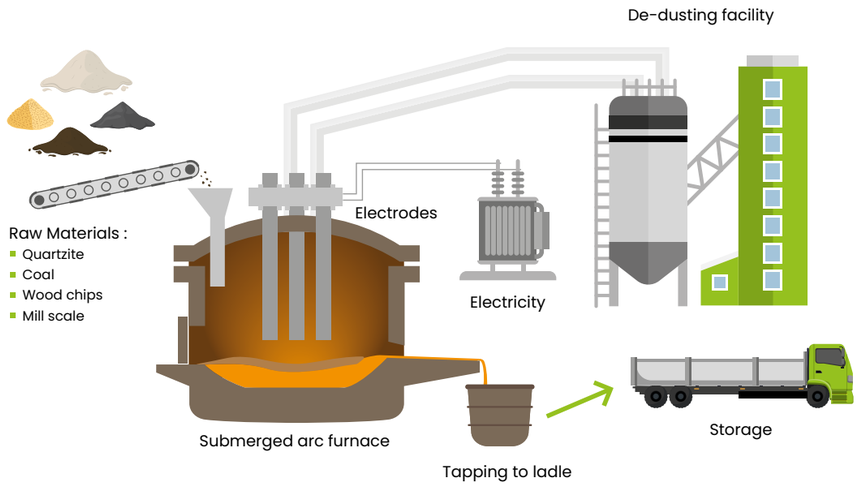
Raw materials supply

Tapping

Smelting

Initial crushing

Fractionation



1. **Silicon alloys, including ferrosilicon, are produced in carbothermic reduction of silica in electric submerged arc furnaces.** The furnaces operate continuously, while the metal is tapped from the furnaces periodically, according to a time interval determined by the technologist. After tapping and pouring the metal into designated crystallisation areas, it is cooled and initially crushed into pieces smaller than 300 mm. The material is then transported for further processing, where it is crushed and screened into commercial fractions: 0-3 mm, 3-10 mm, 10-50 mm, and then sold to the customer.

2. **The final product is ferrosilicon with varying silicon content: FeSi45, FeSi65, FeSi75, FeSi80, which can be enriched with other elements such as: FeSi75+Ca, FeSi75+Al or it can be subjected to decarburisation refining to produce FeSi75 LC.** Ultra-low carbon silicon alloys with chromium, such as FeSiCr LC, are also produced (Si min. 47% by weight, min. Cr – 33% by weight, C max. content 0.025% by weight) and Crosimax (Si min. 60% by weight, min. Cr 21% by weight, C max 0.025% by weight), which are the result of research and development projects.

3. **The production process of ferrosilicon by the carbothermic reduction of silica is a slag-free process.** This process results in the production of an alloy, intermediate products that are directed to recovery melting, and small amounts of waste associated with the wear of refractory linings in technological vessels. The recovery process, conducted in a designated furnace unit, involves melting the intermediate material and separating the metallic portion from the slag. The recovered metal is directed to further processing, while the post-process slag, considered waste, is sold to an external company, which allows the production process to be described as zero-waste.

Laboratory – quality control

The Quality Control Department at Re Alloys provides comprehensive laboratory services for evaluating the technical parameters and chemical composition of elements, with an analysis accuracy of up to 0.01% Both the raw materials used in production and the finished product are analysed at several stages of the production process. Quality parameter control is conducted continuously throughout production, allowing for process stability at every stage of manufacturing and complete assurance that quality requirements are met.

The laboratory of the Quality Control Department is equipped with, among other things, XRF X-ray spectrometers, carbon and sulphur analysers, and a workstation for performing wet analyses using classical chemistry methods. In 2024, we plan to renovate the facilities to better adapt them to laboratory needs. We also intend to acquire one of the strongest jaw crushers on the market to use it for preparing analytical samples.

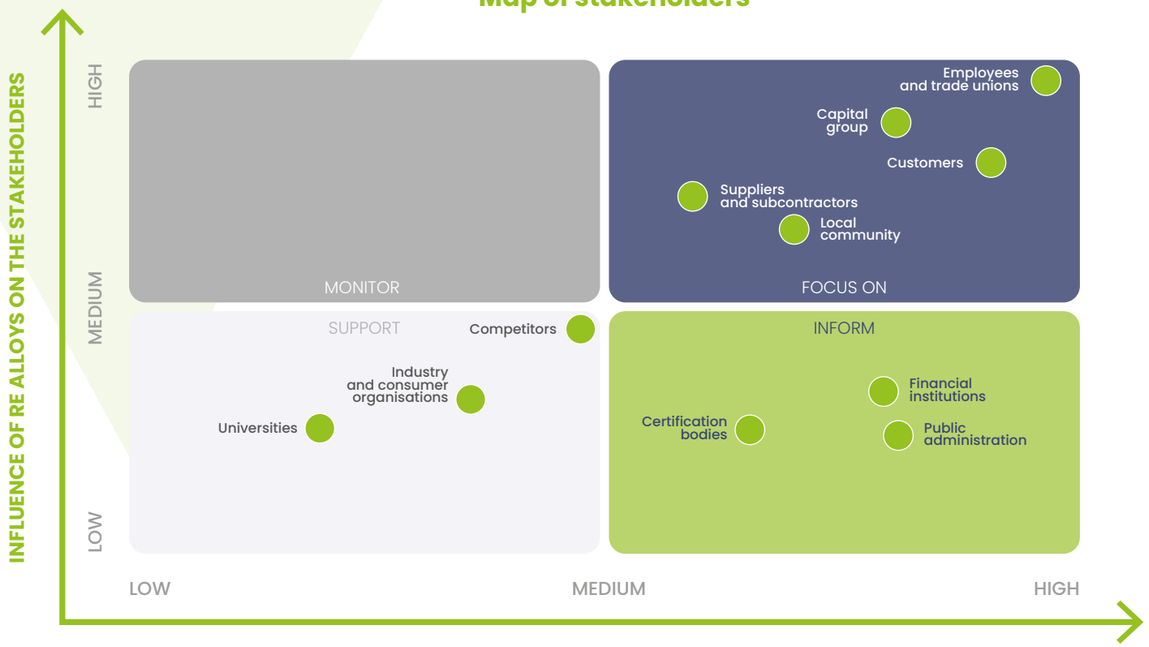
1.5.

Re Alloys stakeholders

Stakeholders of Re Alloys play a crucial role in designing and guiding our actions towards sustainable development. Re Alloys is committed to building long-term relationships with stakeholders, grounded in the values that guide all our activities. The current stakeholder map was created in September 2022, based on internal analyses conducted by department managers. The prioritisation of stakeholders was determined by assessing the strength of their influence.

Inner ring – Key Stakeholders
Outer ring – Important Stakeholders

Map of stakeholders



Selected channels of communication with the Stakeholders

Employees and trade unions

- Regular contact
- Satisfaction survey every two years

Capital Group

Company's representatives recurrently gather with the General Meeting during:

- Annual approval of financial statements, distribution of profit or covering loss
- Other corporate events

Supplier and subcontractors

- Cooperation with suppliers and subcontractors is mostly of a constant nature and is held in a form of direct communication
- Meetings, when needed, over the course of procurement and management of current cooperation with suppliers
- Annual process of key suppliers' cooperation assessment

Local community

- Regular contact

Customers

- Cooperation with customers is mostly of a constant nature and is held in a form of direct communication
- Dialogue with customers, regular customer satisfaction surveys – annual, ad hoc ones

Re Alloys Capitals

Financial capital

Financial resources necessary for conducting business activities, including equity, debt, and funds generated from operational activities. It is crucial for ensuring the financing of the Company's ongoing operations.

- Equity
- Liabilities
- Funds generated from business operations

Production capital

Tangible fixed assets used by the company for conducting its operations.

- Buildings
- Technical equipment
- Machines related to the production of ferroalloys

Innovative capital

The company's intangible assets based on knowledge, intellectual property, and legal rights.

- Knowledge and technologies
- New technological solutions
- New products (processes)
- Research and development projects
- Laboratory

Human capital

Competence, skills, and experience of employees, as well as their motivation to build intellectual capital in the long term.

- Employees
- Specialists
- Experts

Relation and social capital

Competence, skills, and experience of employees, as well as their motivation to build intellectual capital in the long term.

- Employees
- Specialists
- Experts

Natural capital

Natural resources that the company uses and influences.

- Water
- Energy
- Waste
- Natural raw materials

Brands

All information that determines the decisions of consumers and contractors, which may impact profits.

- Reputation
- Affiliation
- Good reviews/PR

Organisational capital

Organisational culture as a set of norms and values followed by employees.

- Values hierarchy
- Ethics
- Specific communication channels

Rules for the consultation

Re Alloys places great importance on collaborating with local communities, including supporting them and minimising the negative impact on residents in the areas where the company operates. **The consultation process has been described in detail in the "Principles of public consultation" paper.** The document sets pillars and framework for dialogue with all stakeholders, regardless of the issue or the party initiating the communication.

Ongoing dialogue with our stakeholders is an important part of managing sustainable development. Considering the needs of our environment, we engage in discussions about sustainable development directions and promote pro-social and pro-environmental attitudes among stakeholders. The information gathered about the local community is a significant factor influencing operational and strategic decisions.

Mindful of the importance of an effective consultation as a chance to use experience, knowledge, concerns, and expectations of the local community, we adopted rules that make the information obtained from the community be a significant factor influencing the operating and strategic decisions.

Membership in organisations

As part of its participation in the associations/organisations listed below, Re Alloys gains knowledge about the challenges facing the metallurgical segment. The company participates in meetings, conferences, and shapes the policies of the associated companies. Re Alloys has the opportunity to signal key development directions for its areas of interest and, in collaboration with the associations, represents a strong voice in discussions with decision-makers and legislators in various sectors of the metallurgical industry.

The company Re Alloys is a member of the following associations/organisations:

Since 2013

Membership in the TGE power exchange

Since 2014

Membership at the Metallurgical Chamber of Industry and Commerce (MCIC) – participation in creation of conditions that favour growth of economic life of the industry and support economic initiatives.

Since 2020

Cooperation with the KSSE – the Katowice Special Economic Zone

Membership in the Employers of Poland – a nationwide representation of employers operating in the interest of employers and protecting their rights.

Since 2021

Membership in the Polish Wind Energy Association.

Since 2022

Cooperation with the Responsible Business Forum – joining the group of Signatories of the Diversity Charter.

Euroalliages – participation in the European Association of Ferroalloy and Silicon Producers – co-participation in promoting safe, environmentally friendly, and competitive production of ferroalloys and silicon in Europe.

RE ALLOYS
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2

Sustainable growth at Re Alloys

GRI [GRI 2-6], [GRI 2-22], [GRI 3-1], [GRI 3-2], [GRI 3-3]

2.1.

Our values and principles

Re Alloys places great importance on ensuring equal opportunities for all employees, clear criteria for evaluation and promotion, opportunities for professional and personal development, and good and safe working conditions. We aim to create a culture of dialogue and cooperation within the company, where all employees feel respected and can freely express their opinions; a culture in which all departments, working as one team, jointly strive to achieve the company's goals.

The corporate values of Re Alloys are the foundation for shaping the organisational culture. They serve as a guide in daily activities, a reference point for decision-making, and an indicator of how company employees should work, what principles they should follow, in which areas they should particularly engage, and how they should collaborate and communicate.

In 2023, a set of values and principles was developed by our company's management team, known as **the Organisational Culture of Re Alloys.** All newly hired employees are introduced to these corporate values, and the entire team is committed to promoting these values through their attitude and behaviour in everyday work.

All the values correlate with each other, as illustrated in the diagram below.

Characteristics of Re Alloys' Values

SAFETY

Safety is at the highest position on Re Alloys' hierarchy of values and we define it in the following areas:

1. Life and health of the employees is the highest priority.
2. Pro-environmental measures
3. Dialogue with the local community,
4. Continuity and stability of operation.

RESPONSIBILITY

All the Company's Employees are co-responsible for actions taken towards the Stakeholders. Our responsibility is demonstrated in the following fields:

1. Operating in a transparent and honest manner, with observance of norms specified in the REA Code of Ethics.
2. Responsibility for decisions and actions taken by us and our team,
3. Establishing long-standing relations with business partners and the local community,
4. Acting in the best interest of the company.

COMMON GOALS

Achieving results with consideration of Re Alloys long-term success by:

1. Setting ambitious targets and constant development,
2. Taking the initiative, focusing on the future,
3. Solid work with the use of the right tools.

COOPERATION

Cooperation is a basis for success at Re Alloys.

1. Team work and good communication.
2. Utilise talents and experience of the employees, their development.

RESPECT

Mutual support and kindness towards others are each employee's priority

1. We create labour culture established on mutual understanding and tolerance.
2. We have a procedure for reporting any breaches in place,
3. Diversity, including multiculturalism, is a value.

2.2.
Areas of impact

Environmental impact

For many years, we have been developing initiatives at Re Alloys aimed at reducing negative environmental impact.

Operating in compliance with the sustainable development rules, in particular respect for the natural environment is one of the most important determinants of the Company's operations.

Our previous approach towards environmental management has been depicted in the Re Alloys Environmental policy being an internal regulation applicable for all the employees and associates of the company. The signpost of the organisation's actions is the Going Green strategy, which focuses primarily on reducing indirect emissions. The solutions of the Environmental Policy and Going Green Strategy, focusing on measures taking into account both the organisation's impact on climate and the influence climate changes have on the Company itself, are based on the following strategic objectives:

- conducting operations aimed at achieving climate neutrality in line with the established objectives;
- reducing CO_2 emissions;
- developing projects related to ecology and environmental protection.

The keynote of the entire business activity of the company is to limit the impact on the environment in all the identified aspects. Prevention and minimising the consequences brought for the environment and climate, rational management of natural resources, and responsible waste management are of key importance for Re Alloys in terms of sustainable development. The implemented environmental management system, compliant with the ISO 14001 standard, along with the KZR INiG certificate (the certificate of meeting sustainable development criteria by the Oil and Gas Institute), ensures that our operations are based on the best available techniques, which minimise our impact on the environment and climate and allow us to meet the stringent environmental standards required by law.

Social impact

Re Alloys now employs over 500 people, which has a significant impact on the local labour market in a town with 22,000 residents. The operation of the plant also positively affects many suppliers and small businesses that cooperate with us, providing a range of services and goods to our employees. We actively participate in the life of the entire county, maintaining regular contact with local authorities, educational institutions, and social-cultural organisations, while also preserving the metallurgical traditions and customs of our region.

Recognising the significant impact our actions have on the community in which we operate, we engage in cultural and sporting events and closely collaborate with local institutions. Together with the Labour Office in Mikołów, branch in Łaziska, we carry out projects of professional insertion and intervention work programmes. Each year we accept students of vocational and technical schools, high schools and universities for internships and apprenticeships. We closely collaborate with the Complex of Power Engineering and Services Schools in Łaziska Górne, the WSB Merito University in Poznań, Chorzów branch, the Silesian University of Technology in Gliwice and other scientific centres.

We have commenced an active participation in projects carried out by Luma Foundation, which we support financially, but also in terms of expert knowledge and employees' voluntary work.

Our actions impact the local community, and we recognise the need for the existence and active involvement of organisations that engage citizens within our community.

In our facility, three independent union organisations operate. Not only do they represent employees, but also strive to integrate them.

With a focus on the importance of a healthy lifestyle, we strive to inspire various grassroots initiatives. This led, among other things, to the creation of a running group that supports its members in achieving their sports goals while also participating in events where funds are raised for social initiatives.

In 2022, the owner established the Luma Foundation, which Re Alloys supports not only financially but also by providing expertise and enabling employees to engage in its activities through employee volunteering. Together, we take actions and create projects aimed at achieving ESG goals in our community. In addition to that, we collaborate with the Social Development Centre in Mikołów, the Polish Scouting Association with units in Katowice, Mikołów, and Łaziska. We also cooperate closely with the Afriqua Foundation.

Corporate governance and business ethics

At Re Alloys, we believe that sustainable development and profitability can coexist in harmony. We strive to create sustainable value growth for all stakeholders, balancing financial performance with progress in implementing sustainability practices. We manage our company in accordance with the highest Polish and international standards. We follow relevant guidelines and developed codes and procedures, integrating ethical, social, and environmental considerations. All our stakeholders have access to clear and transparent information about our operations. This approach ensures our effectiveness, builds trust in the company, and creates value for our stakeholders. In the coming years, we will focus on maintaining high ethical standards as well as developing our procedures and compliance system.

The main policies, procedures, and other documents regulating due diligence in ESG:

- Diversity Policy
- Anti-mobbing Policy
- Respect for Human Rights
- Procedure of reporting actual or potential breaches
- Energy management policy
- Employment Policy
- Tax Policy
- Code of Ethics and Code of Business Conduct
- Policy on countering unfair practices in the LUMA Group
- Rules of Procedure for Suppliers

2.3.

Significant ESG matters

In 2023, Re Alloys conducted the ESG issues significance survey with the use of the expanded questionnaire for various groups of Stakeholders.

We involve external and internal stakeholders of Re Alloys in the process of selecting material aspects for reporting. The process of defining the material reporting aspects at Re Alloys comprised the following actions:

Identification

Significant Re Alloys business matters and sectors of sustainable development were specified and defined during consultation with the management and professional staff. Materiality matrix was developed in the basis of Re Alloys groups of stakeholders and surveys sent to them. The survey included a number of questions answers to which gave Re Alloys the idea of key sectors. By virtue of this form of dialogue, Re Alloys had a chance to learn which sectors and to what extend interest our recipients the most. The significance and materiality of the topics will be published in the 2023 ESG report.

Prioritisation

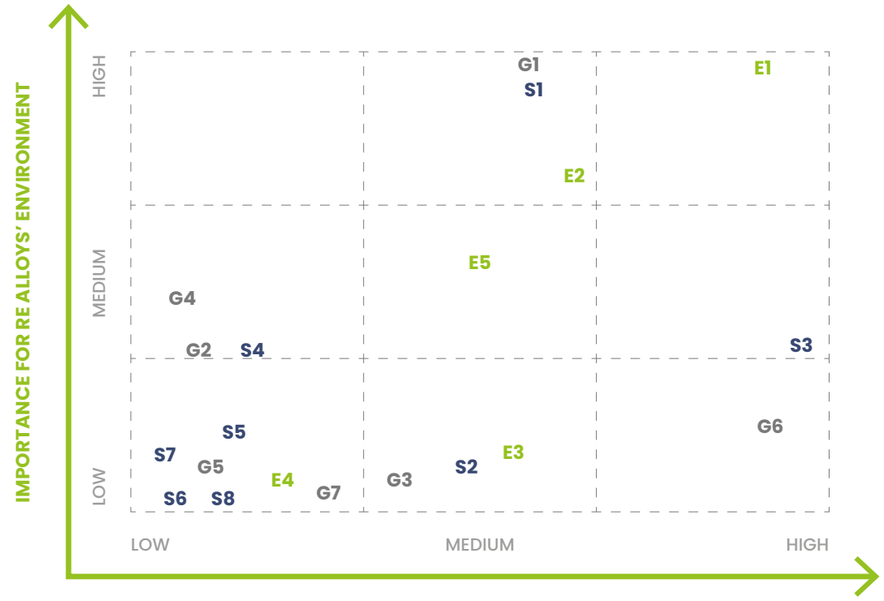
The survey sent in November 2023 included matter divided into 3 fields: Social, Environmental, and Corporate Governance. The respondents awarded points to particular topics and assessed their materiality.

Validation

Filling out the surveys by external and internal Stakeholders. The survey covered, among others, economic, social, and environmental aspects of reporting. The Stakeholders indicated materiality of each aspect. The outcome of these works was the final shape of the list of Re Alloys material reporting aspects along with their materiality for the company and its surrounding.

Reflection of the gravity and importance of the fields is presented in the interactive infographic of **the materiality matrix.**

Materiality matrix



E1 green energy
E2 limitation of negative impact on the environment including reduction of carbon footprint
E3 environmental compensation
E4 water treatment
E5 the company's response to the challenges related to climate change

S1 occupational health and safety
S2 respect for human rights
S3 employee benefits, conditions of employment, professional development
S4 satisfaction survey and dialogue with employees
S5 promotion of health and healthy lifestyle among employees
S6 social and recreational actions
S7 relations with customers
S8 dialogue with the local community

G1 innovation and R&D
G2 cybersecurity / data safety
G3 strategy and financial standing
G4 responsible supply chain
G5 sponsorship – charity campaigns
G6 ethics and values at the work place
G7 compliance with regulations

2.4.

Objectives and plans for 2024

Re Alloys defines sustainable development as intragenerational solidarity consisting in searching for such solutions ensuring further growth which allow active inclusion of all social groups in developmental processes, at the same time providing those groups with a possibility to benefit from economic growth.

Along with our business partners, we take action aiming at the most effective growth. A starting point for consideration on sustainable development goals is "The 2030 Agenda for Sustainable Development" adopted by United Nations in 2015. Amongst 17 identified sustainable development goals, 9 related to metallurgy industry were chosen. Re Alloys, however, attains many more goals than only those considered to be typical for the sector it operates in.

Key commitments and their realisation in 2023

FIELD	GOAL	EXTENT TO WHICH IT IS ACHIEVED	SUSTAINABLE DEVELOPMENT GOALS
E	Implementing the Going Green Strategy	**pending**	7 AFFORDABLE AND CLEAN ENERGY; 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE; 13 CLIMATE ACTION
	Replacement of a 40MVA transformer with a more energy efficient unit	**100%**	
	Employee education and raising environmental awareness among employees through the organisation of the Green Office campaign.	**100%**	
	Carbon offset by continuation of trees planting campaigns	**100%**	
S	Aid to those in need: Szlachetna Paczka [Noble Gift], WOŚP	**100%**	1 NO POVERTY; 2 ZERO HUNGER; 3 GOOD HEALTH AND WELL-BEING; 4 QUALITY EDUCATION; 5 GENDER EQUALITY; 8 DECENT WORK AND ECONOMIC GROWTH
	Promotion of healthy lifestyle participation in charity runs	**100%**	
	Employee opinion survey	**100%**	
	Implementation of the ISO 45001 norm – occupational health and safety management system	**pending**	
	Personal development, skill enhancement: for employees – continuation of the English language course	**100%**	
	Fostering family bonds and values: family picnic for employees, planting trees with the participation of employees and their families	**100%**	
G	A supplier evaluation system has been implemented	**100%**	
	GDPR trainings	**100%**	
	Implementation of a business continuity management system according to ISO 22301	**pending**	
	Introduction of the Organisational Culture	**100%**	

We have set the key Sustainable Development Goals for 2024 and concrete actions for us to take aiming at their achievement.

Environmental objectives

- implementing the Going Green Strategy
- construction of a zero-emission heat source – it will power the plant's heating network by utilising waste heat from the cooling system of the electric arc-resistance furnace used in ferroalloy production. This project will save 262 MWh of electricity annually, with avoided CO_2 emissions amounting to 179,524 kg per year.
- reduction of electricity consumption in line with the objectives of the NOSAL R&D module project, which aims to develop an innovative technology for utilising by-products from the production of ferrosilicon (FeSi).
- construction of a 35 MW photovoltaic installation in accordance with the objectives of the NOSAL greening module project.
- carbon offset by the continuation of trees planting campaigns
- employee education and raising environmental awareness through initiatives such as forest clean-up campaigns.

Social objectives

- improving working conditions at positions related to furnace operation and reducing thermal radiation exposure
- personal development, skill enhancement: for employees – continuation of the English language course, trainings in AI
- implementation of the ISO45001 norm – occupational health and safety management system
- promotion of active lifestyle – participation in charity runs
- providing assistance to those in need through initiatives like Szlachetna Paczka [Noble Gift], WOŚP [the Great Orchestra of Christmas Charity]
- fostering family bonds and values: family picnic for employees, planting trees with the participation of employees and their families, camps for employees' children
- promotion of well-being – organising integration trips, and offering opportunities for rest and relaxation after work

Corporate governance and business ethics

- implementation of a business continuity management system according to ISO 22301
- creation of a value chain
- implementation of the Sustainable Development Policy
- introduction of Supplier Audits – focusing on Sustainable Development Goals and the quality of supplied materials or services.

RE ALLOYS
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3

Environmental impact

GRI [GRI 3-3], [GRI 302-1], [GRI 303-1], [GRI 303-2], [GRI 303-3], [GRI 303-4], [GRI 303-5], [GRI 305-1], [GRI 305-2], [GRI 306-1], [GRI 306-2], [GRI 306-3]

3.1.

Environmental policy at REA

Re Alloys, as an entity operating in line with social responsibility principles, takes initiatives aiming at reducing the adverse impact on the environment. The environmental aspect of the sustainable development concept is one of the most significant principles determining the organisation's activity. We take on ambitious commitments geared towards reduction of climate change and raising awareness of this matter. The embodiment of the above is the adoption and publication of the Going Green Strategy – a document including an overall goal, that is, presentation of the Company's climate ambitions and determination of the course of action and particular initiatives aiming at reduction of carbon footprint.

We also carry out a range of activities focused on raising awareness about climate change and promoting actions and attitudes directed towards nature conservation.

The organisation continuously monitors, identifies, and analyses all aspects of environmental impact, providing a foundation for the ongoing improvement of processes and making responsible decisions in every aspect of our operations.

In our activities we aim at full compliance with the applicable law and other regulations and provisions regarding the environmental protection, as well as with the voluntarily adopted requirements of the ISO 14001 standard and the best available techniques (BAT) for ferroalloys production. Considering the sustainable development criteria, in an effort to preserve biodiversity, the Company is subject to the voluntary biomass certification system compliant with RED II – the Directive that supports application of renewable energy sources and ensuring responsible use of natural resources.

Re Alloys has successfully introduced a chemical substance management system into its operation, in compliance with the REACH Regulation. Under the REACH system, the Company registered in the European Chemicals Agency all the substances placed on the market, and in its everyday operation it stores, uses, and makes the substances available based on the regulation's requirements. A significant part of the production installation is the Water Recovery Station, owing to which it is possible to use a closed industrial water circuit, which reduces water consumption to the minimum.

The principles of sustainable development also form the basis of our daily operations, where we strive to continuously minimise our negative environmental impact through:

1. **maximising the reduction of emissions to air,**
2. **supervision over the waste management and proceeding with waste in compliance with the law,**
3. **reduction of noise and its emission to the environment,**
4. **raising environmental awareness of our organisation's employees,**
5. **cooperation with parties interested in our impact on the environment**

Within the current targets, we strive to introduce state-of-art technologies that allow us to effectively consume energy and other utilities, rationally use raw materials, minimise emissions to natural environment, and full economic utilisation of the generated wastes. We also conduct pro-climate activities by investing in solutions for, among others, high greenhouse gas savings.

Re Alloys Environmental Policy

3.2.

Impact of operations on climate and the Going Green strategy

There are tasks set out by sustainable development-oriented regulations and goals – we approach them with full responsibility. When planning and following the company's strategy, we implement innovations and take pro-climate initiatives. Doing our business, we abide by the environmental protection law requirements. On an ongoing basis we control indicators of, e.g. wastes generation, energy and heat consumption, water consumption. We monitor legal regulations and we prepare the statutory environmental reporting.

Yet we do not limit to meeting the requirements only, we also set ambitious objectives exceeding the imposed standards. Environmental objectives are one of the keystones of strategic planning of organisation's growth. Currently, the main area of interest are the targets set out in terms of pro-climate activities. Investments we make and innovations we implement influence energy efficiency of the processes, energy consumption volume, and gradual transition to renewable energy sources.

Ambitious environmental goals are outlined in the published document"Going Green Strategy," which describes the main actions for climate protection. Going Green is the foundation of our environmental protection efforts and is also aligned with our corporate social responsibility policy. Re Alloys is an enterprise with significant energy needs, so transitioning to renewable energy sources will enable us to avoid CO_2 emissions on a scale comparable to that of a city with hundreds of thousands of inhabitants. Moreover, having our own renewable energy sources will allow us to achieve energy independence, which will positively impact the growth of our company and help maintain high-quality jobs, even in times of uncertainty and significant increases in energy market prices.

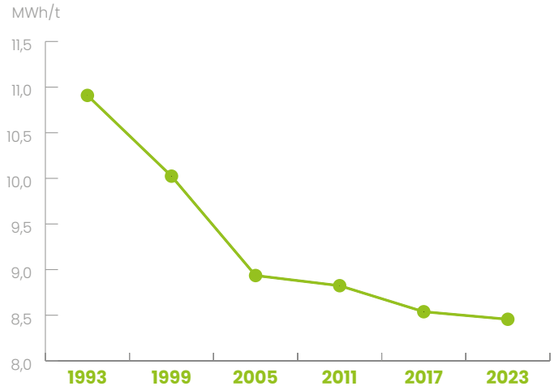
Going Green Strategy

3.3.

Energy

A key aspect of reducing energy consumption in the production of ferrosilicon using the carbothermic reduction method of silica is the continuous optimisation of the process. This optimisation aims to increase the recovery of the primary element (silicon) into the alloy, improve daily production efficiency, and decrease the specific energy consumption per tonne of product. The quality of the raw materials used, the technical condition of furnace units, the experience, knowledge, and motivation of production workers, and the expertise of plant specialists—particularly the technologists overseeing the production process from raw material assessment to product shipment—are all crucial in this regard. As a result of the plant's optimisation efforts and ongoing research and development activities, the performance indicators for ferrosilicon production have consistently improved. This is illustrated in the graph showing the operation of the 12 and 20 MVA furnaces during the production of our primary product—ferrosilicon with a minimum silicon content. 75% by weight. (FeSi75) since 1993.

Electricity consumption
[MWh / t]



3.4.
Greenhouse gases emission

Due to the nature of its business activity, Re Alloys feels responsible for the environment, especially for the quality of air and curbing the effect of climate change.

The investments, development projects, and upgrades always factor in environmental aspects and softening the environmental impact mostly by improving the process energy efficiency, which reduces among others the Scope 2 greenhouse gas emissions.

Since 2013, the plant has been an active participant of the EU ETS, which was established for reducing the emissions causing climate change. Under the scheme, in cooperation with scientific centres, through regular measurements and analyses, a detailed monitoring of carbon dioxide emissions is being held and initiatives aimed at their reductions are being taken.

Re Alloys pursues its highly ambitious goals targeted at reduction of indirect greenhouse gas emissions by a number of investments in terms of construction of renewable energy sources, increase of energy efficiency or waste heat utilisation. The Company presents the measures planned in this scope in the Going Green Strategy book.

2023

Scope 1 – 3.36t CO_2/t

Scope 2 – 0.87t CO_2/t

Scope 3 – 0.769t CO_2/t

3.5.
Water and wastewater

Water usage in the production process

In the production of ferroalloys, water is primarily used for cooling production units. The cooling is conducted in open (wet) cooling towers, also called evaporating towers. The essence of the process is using vaporisation heat of water what leads to its losses. The source of water to replenish the losses of cooling systems is the water treatment station operating at the plant. It consists of re-use of treated waste water discharged by the plant's sewage and is transported to the Water Treatment Station (SOW). Waste water inflowing through the plant's sewage are treated using mechanical and biological processes. The treated wastewater is then stored in retention tanks. Then, waste water is subject to decarbonisation and coagulation carried out in accelerators. Over this process, suspensions, carbonate hardness, and many other pollutants, including heavy metals, are removed from water. After passing through the accelerators, the water is further filtered and can be used to replenish the cooling circuits.

Water consumption at the plant

A. Water from the water supply system

The purchased water from the municipal supply is used for both social and industrial purposes.

Industrial consumption primarily includes:

- supplying the water demineralisation station for the internal cooling circuits of furnace units,
- replenishment of cooling systems in the case of a shortage or poor quality of industrial water (during rainless periods),
- filling tanks of fire extinguishing systems,
- production of water and dust mixture,
- maintaining cleanliness in production facilities and preventing raw material dust emissions.

B. Groundwater from SŁG-1 water intake

Due to its very low quality, it is directed to the coagulation process at the Water Treatment Station and, together with recovered water, is used to replenish the cooling circuits.

C. Industrial water in cooling circuits

Industrial water is used for replenishment of cooling systems. The circuits are used for cooling furnace units in Furnace Buildings I and II-via the Central Pumping Station circuit and in Furnace Building IV-via the Pumping Station IV circuit. Water losses are proportional to the amount of heat received by the cooling tower.

D. Recovered industrial water at the Water Treatment Station

Industrial water is prepared at the plant's Water Treatment Station. Water is recovered from wastewater entering through the plant's sewage system.

To ensure the highest quality of water resources at our plant with minimal environmental impact, we conduct continuous monitoring of water and wastewater management. Our efforts are aimed at full compliance with applicable legal regulations, our Water Law Permit, and the procedures we have adopted, including EKO 31 –"Water and Wastewater Management."

Proper exploitation of water cycles requires constant monitoring of cooling waters parameters, such as: alkalinity, hardness, conductivity, pH, amount of suspension, etc. What is also monitored is quality and amount of waste water in the periods of large influx of rainwater and water discharged to the environment after treatment. The research is multi-stage.

The research is a multi-stage process:

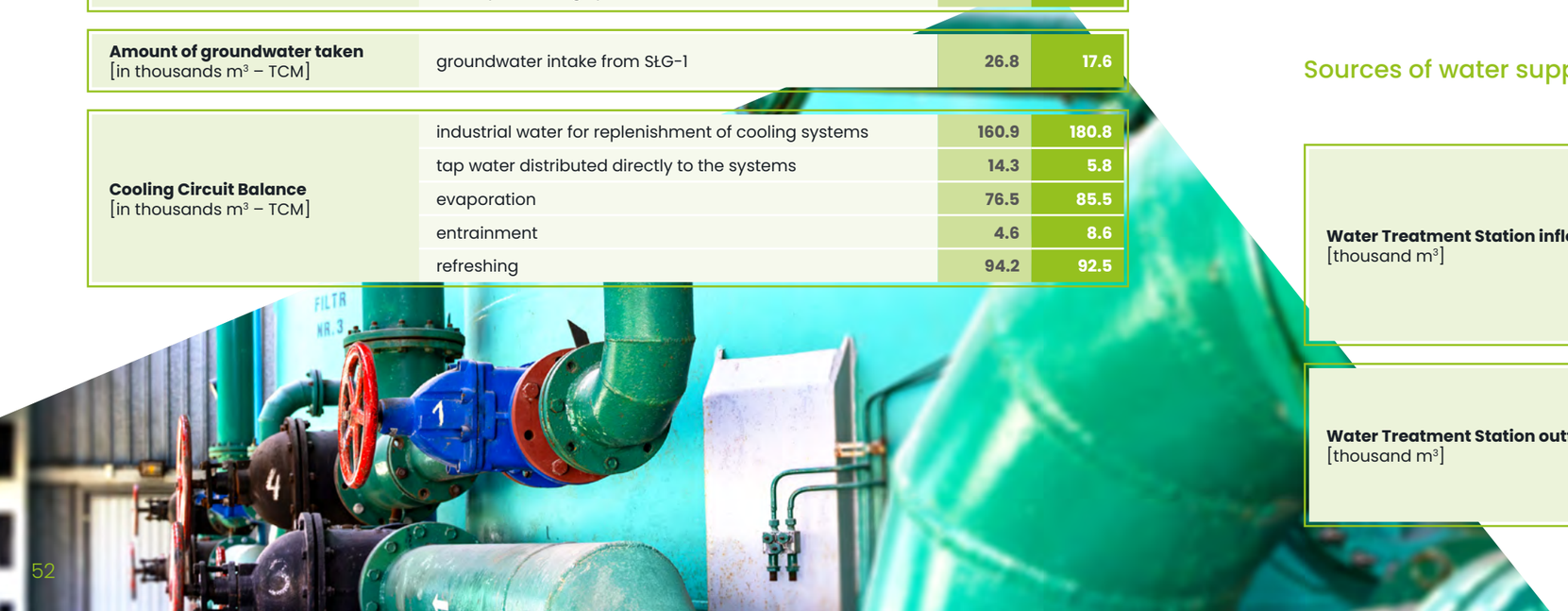
5. On site, continuous measurements of pH and conductivity of auxiliary and circulating water are carried out. The level of biological contamination and the corrosion rate are also being checked.
6. At the SOW in-process laboratory, P and M alkalinity is measured on an ongoing basis. These parameters are the basis for the decarbonisation process control.
7. At the plant's laboratory, once a week, the following rates are measured: sulphates, chlorides, suspension, and general and calcium hardness.
8. Each month, circulating and auxiliary waters are tested by an external company. What is tested are the key parameters for protection of cycles from corrosion and precipitation.

In order to comply with the integrated permit conditions and abide by the law, it is required to test water, waste water, and wastes in laboratories having proper accreditations.
Tests are carried out on:

a. discharged waste water,
b. collected groundwater,
c. groundwater samples from piezometers,
d. sludge and grit chambers contents.

Water consumption at the plant

		2022	2023
Amount of purchased water from the supply network [in thousands m³ – TCM]	purchased supply network water	37.9	29.0
	for social purposes	17.5	19.0
	for industrial purposes	20.4	10.0
	directly to cooling systems	14.3	5.8
Amount of groundwater taken [in thousands m³ – TCM]	groundwater intake from SŁG-1	26.8	17.6
Cooling Circuit Balance [in thousands m³ – TCM]	industrial water for replenishment of cooling systems	160.9	180.8
	tap water distributed directly to the systems	14.3	5.8
	evaporation	76.5	85.5
	entrainment	4.6	8.6
	refreshing	94.2	92.5



Sources of water supply

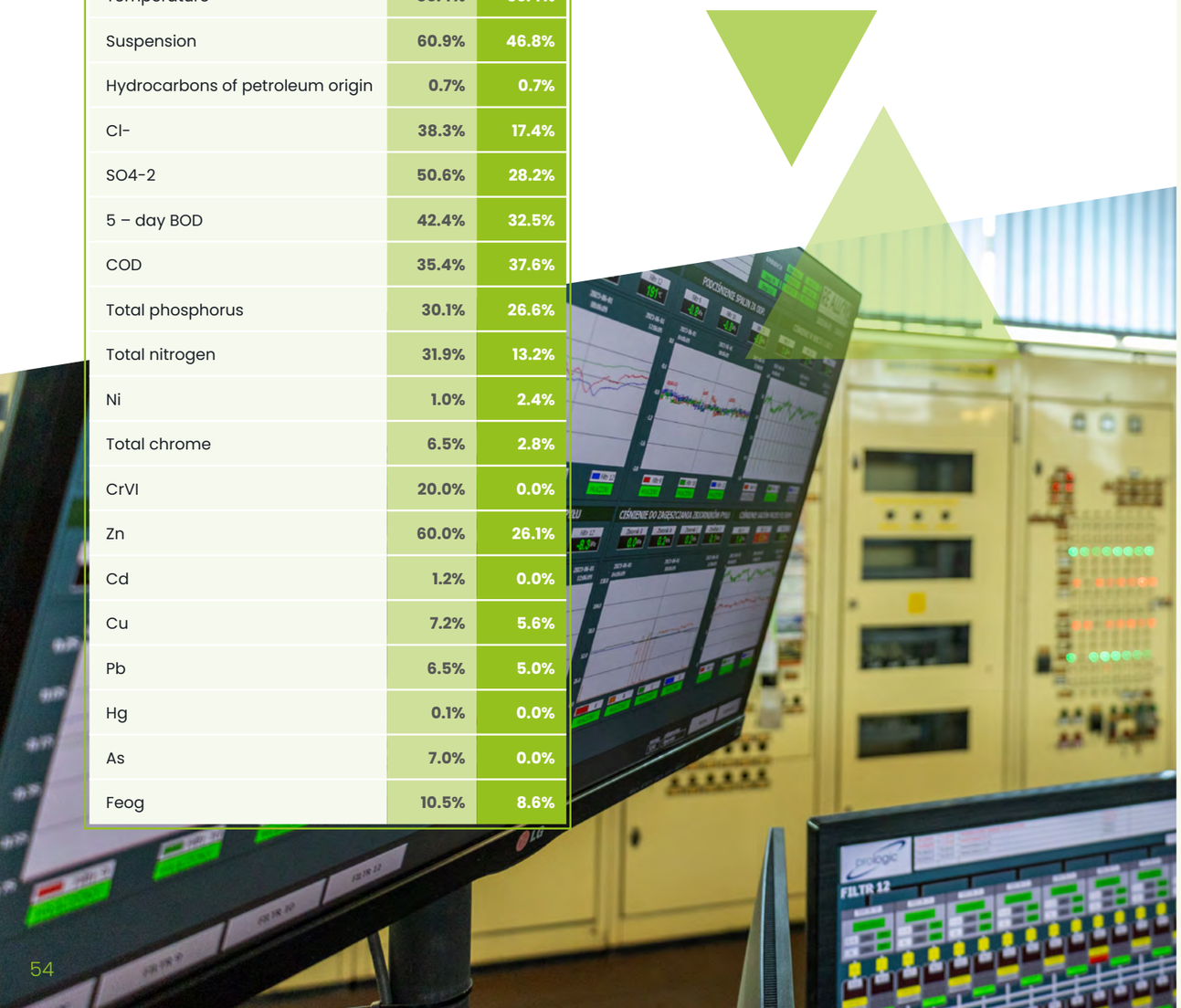
		2022	2023
Water Treatment Station inflow [thousand m³]	refreshment of cooling systems	94.2	92.5
	waste water generated from purchased tap water	26.8	23.2
	groundwater intake – for decarbonisation and coagulation process	26.8	17.6
	rainwater sewage	79.8	154.6
	Total:	**227.6**	**287.9**
Water Treatment Station outflow [thousand m³]	treated waste water discharged into the environment	65.7	106.2
	reclaimed industrial water	160.9	180.8
	for replenishment of cooling systems	1.0	0.9
	Total:	**227.6**	**287.9**

Emissions to the environment

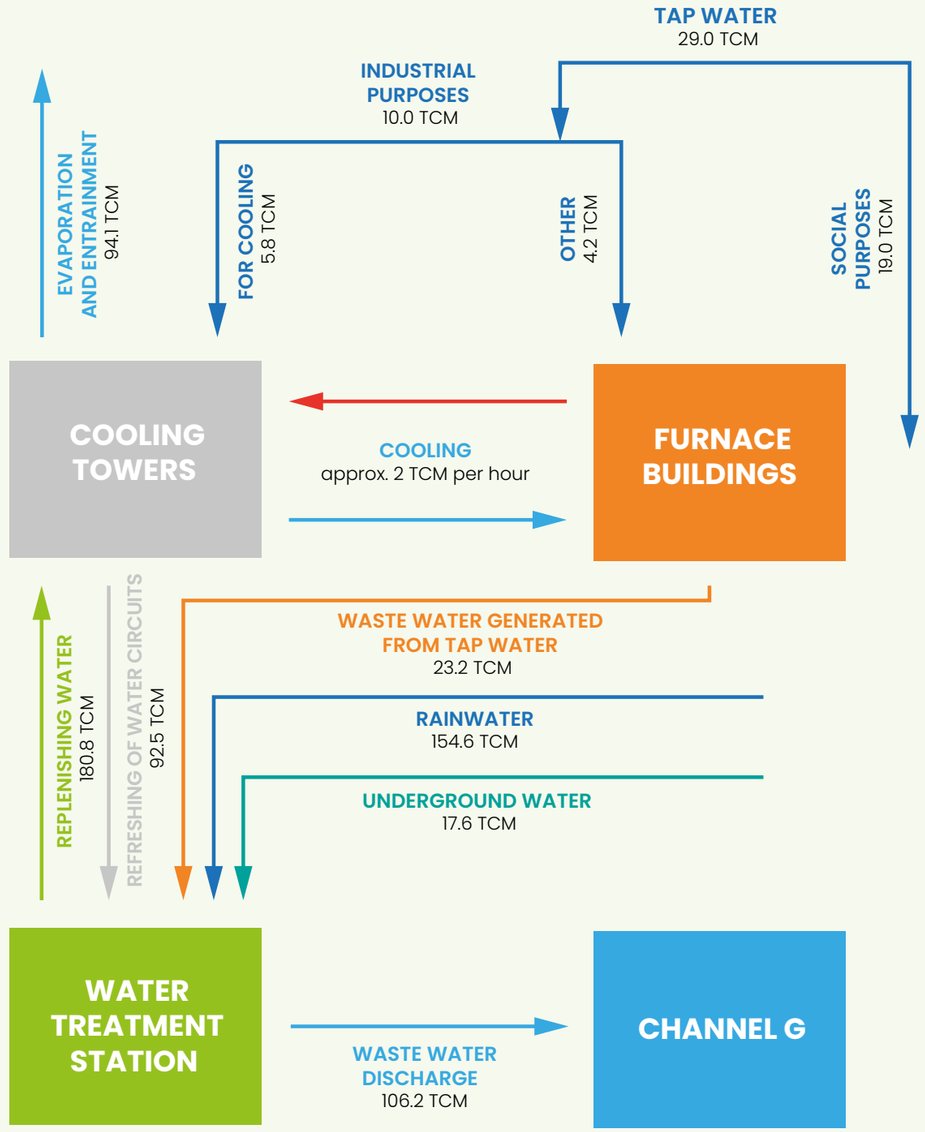
The reported emission loads to the environment are maintained at very low levels relative to the allowable percentage limit granted to us in our integrated permit. Our sludge meets high requirements of environmental protection standards, that is why it is used for agricultural purposes.

Percentage of the indicator of actual emission to water in relation to the limit imposed in the integrated permit

	2022	2023
Temperature	35.4%	39.4%
Suspension	60.9%	46.8%
Hydrocarbons of petroleum origin	0.7%	0.7%
Cl-	38.3%	17.4%
SO4-2	50.6%	28.2%
5 – day BOD	42.4%	32.5%
COD	35.4%	37.6%
Total phosphorus	30.1%	26.6%
Total nitrogen	31.9%	13.2%
Ni	1.0%	2.4%
Total chrome	6.5%	2.8%
CrVI	20.0%	0.0%
Zn	60.0%	26.1%
Cd	1.2%	0.0%
Cu	7.2%	5.6%
Pb	6.5%	5.0%
Hg	0.1%	0.0%
As	7.0%	0.0%
Feog	10.5%	8.6%



Water management chart



Source: Own study for 2023 based on readings from water meters and based on invoices for water supply.

3.6.

Wastes and waste management

Generation of wastes is an inevitable part of almost every industrial activity. Our plant's operation also causes production of substantial amount of industrial wastes. These, however, are mostly non-hazardous wastes that do not pose any threat.

We focus our efforts on reducing waste generation, properly storing and sorting it to ensure the highest possible levels of recycling and recovery. Owing to this responsible waste management, about 99 percent of the generated wastes is recovered. What is more, external wastes are also recovered in the installation. As a result, the plant recovers more wastes than it generates.

Re Alloys maintains current qualitative and quantitative record of wastes with the use of the national electronic waste database (so-called "BDO") and files the required statements within the statutory deadline. Management of generated wastes is kept in compliance with principles set out in the Waste Law of 14/12/2012 (Journal of Laws of 2013, item 21, as amended) and in line with the relevant permits in terms of waste management. Hence all the actions are planned, designed, and taken in a manner preventing generation of waste or reducing the amount of generated wastes. Waste that could not be avoided is first subjected to recovery, and when this is not possible due to technological, economic, or environmental reasons, it is disposed of. Landfilling of wastes is carried out only when other manners of disposal are not possible. Currently, only a trace amount of waste, constituting about 0.7% of the total managed waste, is sent to landfill. These are exclusively waste that is part of municipal waste. Moreover, at the company, there are internal regulations in place to set out the principles of rational management of waste and their re-use. The regulations are adopted under the environmental management system.

Silimic – pył krzemionkowy

Wastes 2023

Waste taken for recovery	t	**9,345**
Waste recovered in the installation		**9,345**

Waste from the installation	t	**9,223**	
Waste transferred		**recovery**	**storage**
	t	**9,161**	**62**
	%	**99.3**	**0.7**

RE ALLOYS
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4

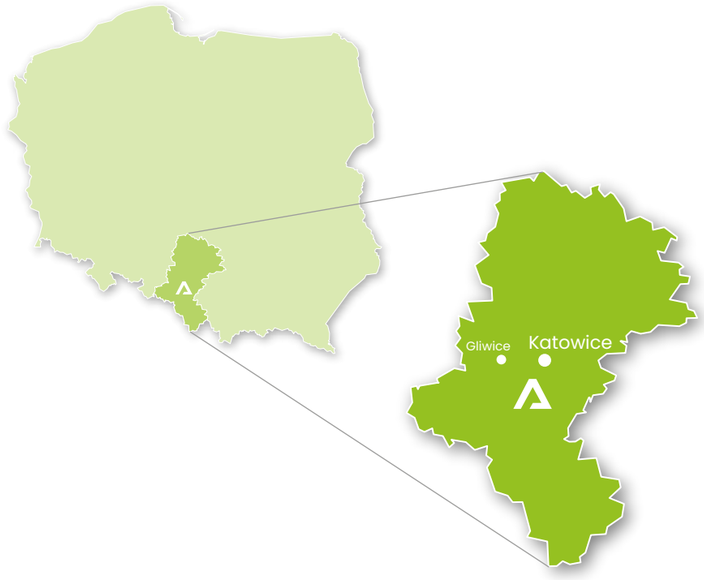
Social impact

GRI	**[GRI 2-6], [GRI 2-7], [GRI 3-3], [GRI 2-30], [GRI 403-1], [GRI 403-2], [GRI 403-3], [GRI 403-4], [GRI 403-5], [GRI 403-6], [GRI 403-7], [GRI 403-8], [GRI 403-9], [GRI 403-10], [GRI 401-2], [GRI 404-1], [GRI 404-2], [GRI 405-1], [GRI 405-2]**

4.1.
Work place

Location

Re Alloys is located in Łaziska Górne, a town in southern Poland, in the Silesian voivodship, within the Mikołów County. The town has 21,116 inhabitants as of 2023.



Work environment

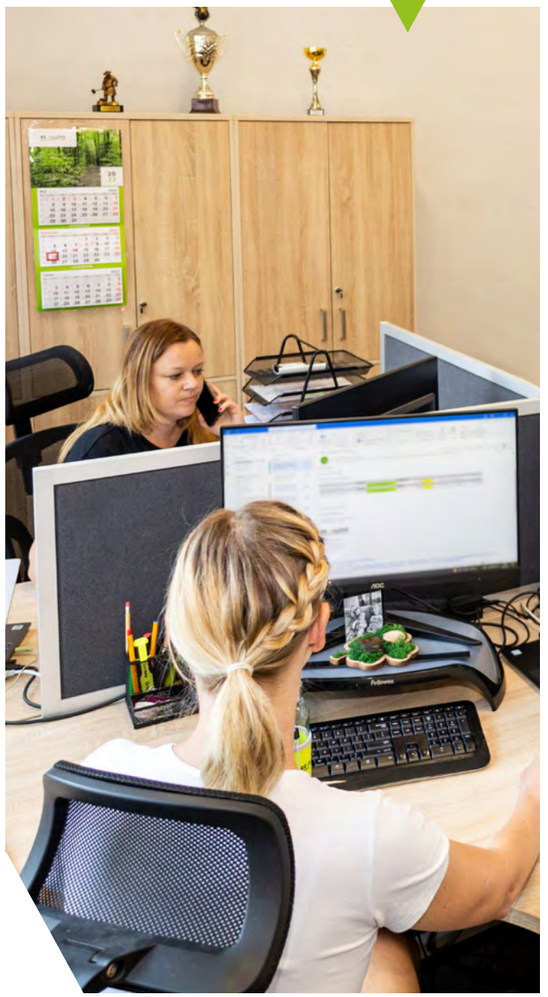
Employees work in industrial conditions, with attention to occupational health and safety. We systematically modernise workstations.

At Re Alloys, we promote the idea of sustainable development among employees in all areas of life. We hold a belief that an organisation's growth is possible when people share the same values.

Employment and working conditions at REA

Employment matters are regulated by detailed procedures and guidelines at our company. Along with workforce lifecycle, we provide a full recruitment and onboarding programme for new hires.

The average employment in 2023 was 489 people. All employees were employed under an employment contract. Three people had mandate contracts. The majority of employees have permanent employment contracts.



Labour matters are governed by:

- Work Rules
- Remuneration Rules
- Bonus and awards Rules
- Employment policy
- Anti-mobbing Policy
- Procedure of reporting actual or potential breaches
- Diversity Policy
- Respect for Human Rights

Working hours

The standard working time is 8 hours per day in the basic working time system. Production work is conducted in a round-the-clock or rotating shift work system.

Social benefits

Employees have access to a package of social benefits, including Medicover Sport cards, private health insurance, and holiday benefits.

Employment structure

At Re Alloys, employment is steadily increasing, which is related to the dynamic growth and the implementation of a strategy for sourcing electricity from green energy sources.

Number of staff members

The company employs 483 people. 58 of them are women and 425 are men.

Positions

Employees are employed in various roles, including production, logistics, and administration.
The largest group consists of production workers (approximately 216 people).

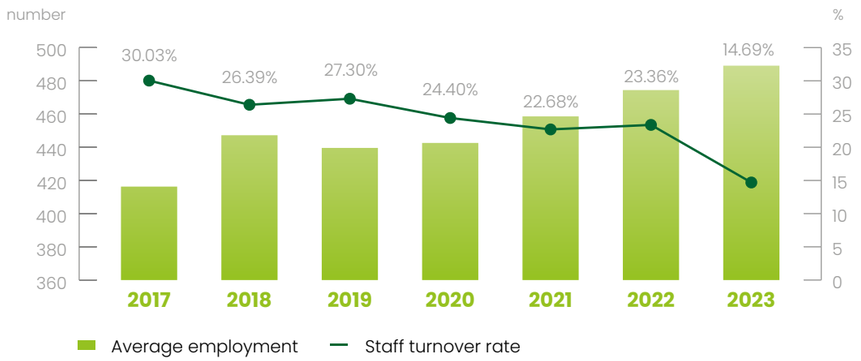
	Total	Women	Men
SENIOR PERSONNEL	**9**	**4**	**5**
aged 51 and above	3	1	2
aged 31-50 years	6	3	3
aged up to 30 years	0	0	0
MID-LEVEL PERSONNEL	**16**	**2**	**14**
aged 51 and above	6	0	6
aged 31-50 years	10	2	8
aged up to 30 years	0	0	0
OTHER PERSONNEL	**458**	**52**	**406**
aged 51 and above	136	23	113
aged 31-50 years	257	26	231
aged up to 30 years	65	3	62
TOTAL EMPLOYEES at all levels of the structure	**483**	**58**	**425**
aged 51 and above	145	24	121
aged 31-50 years	273	31	242
aged up to 30 years	65	3	62

Number of employees broken down by the period of time the employment agreements are concluded for

	Total	Women	Men
	483	**58**	**425**
indefinite period	355	47	308
definite period	124	11	113
probationary period	4	0	4

Employee turnover

The employee turnover rate significantly decreased in 2023 to 14.69% (down from 23.36% in 2022 and 22.68% in 2021). This was partly due to changes in the employment structure by increasing the number of non-production positions and reducing production. The average employment increased from 474.42 people in 2022 to 489.12 in 2023.



Trade union organisations

Trade unions

Some employees are union members. The unionisation rate **is 19.84%.**

Relations with unions

In our company, we cultivate a culture of mutual respect and open communication with employee representatives. We meet with trade unions at least once a quarter, or more frequently, if necessary, which leads to the joint identification of issues and the development of solutions that benefit both employees and the entire company.

NSZZ"Solidarność" trade union	NSZZ"Solidarność 80" trade union	KM WZZ"Sierpień 80" trade union
58 people in 2022	**13 people** in 2022	**12 people** in 2022
74 people in 2023	**12 people** in 2023	**11 people** in 2023

Training and development

The rules for conducting training at Re Alloys are regulated internally. The process of planning employee development is part of the annual evaluation and goal-setting process. Individual training and development needs are identified during discussions between the employee and their supervisor as part of the employee's development planning.

In 2023, training was conducted in the following areas:

- vocational trainings
- OHS trainings
- knowledge-expanding trainings
- employee participation in conferences, trade fairs, and congresses

In 2021, we implemented a competency matrix programme. Based on this programme and continuously developing it, we have created a transparent system for compensation and career path planning. We firmly believe that our people are our greatest asset. We employ workers who stay with us from their school days and internships all the way to retirement. To leverage our knowledge potential and streamline communication channels, especially for new employees, we have implemented the"Team 0" programme. It is a structured training programme for every new furnace staff member. Under the watchful eye of an experienced colleague, the new employee goes through the entire training scheme so that they become familiar with the specifics of the plant. White-collar workers at the moment of hiring are given a two-week onboarding schedule, under which they are to get familiar with all the company's departments, meet their managers, and understand the processes at the production. One of the significant parts is understanding the production process itself. For this purpose, production director or manager gives the new employee a tour of the smelter's premises and presents technological details of the ferroalloys production.

A total of the following participated in training:

- **192 people** in professional training that ended with exams and obtaining certifications—these trainings had a 100% success rate;
- **274 people** in occupational health and safety (OHS) training;
- **44 people** in other training sessions, conferences, and seminars aimed at enhancing knowledge.

Through the funds spent on training, we secured a subsidy of PLN 18,885.60 from the National Training Fund for energy-related training and exams.

Number of trained people

		2022	2023
Number of trained people	Women	33	39
	Men	406	471
Number of hours	Women	827	482
	Men	6,225	4,143

Communication with employees

Re Alloys uses regular meetings, the intranet (iHR), and employee surveys through communication boxes.

Since 2020 we have been trying to structure dialogue and communication with employees. In 2021, we implemented the communication boxes idea. The boxes are located at the premises of the plant, in various convenient spots. Three types of forms are to be found at the boxes: praises, propositions for improvements, complaints. The forms are gathered every two weeks by the HR staff, then they are summarised and presented to the Management Board. In response to such suggestions, for example, we have changed some elements of the competency matrix, we also introduced sport membership cards for employees.

Once a day, there is a briefing of staff members responsible for production. Daily hybrid meetings provide an opportunity to discuss important and problematic issues, also they enable the update of information on progress of works. One a week, on Tuesdays, there is a meeting of the Management Board with managers of each department. At the meeting, there are financial, commercial, production, and HR information reported. We also strive to address the most pressing issues concerning the daily operations of the company.

Once a week, there is a commercial briefing where information on level of stocks, sales plans, and procurement related to them is exchanged.

Since 2022 we have restored annual Christmas meetings with employees. At those meetings, management board members provide the team with the information on the current situation of the company, they sum up the year, and describe target for the year to come. Once a year, since 2021, we have been organising a family picnic, which is a great opportunity to award the most distinguished employees, but it also gives a chance to gather some information from the employees.

For 2023, we planned to conduct the employee satisfaction survey in order to collect opinions and to implement additional programmes in terms of improvement of working conditions.

At least once a quarter there is a meeting with a social side represented by trade unions. During the meeting, we provide current information in the company's situation, markets, and competition. It is also a great chance to listen to the social side and make suggestions as per remuneration and work conditions at the plant.

Remuneration and additional benefits

Remuneration structure

Salaries consist of a fixed and a variable component.

Additional benefits

Employees receive performance-based bonuses and additional benefits (e.g., lunch cards).

Women's to men's average remuneration ratio

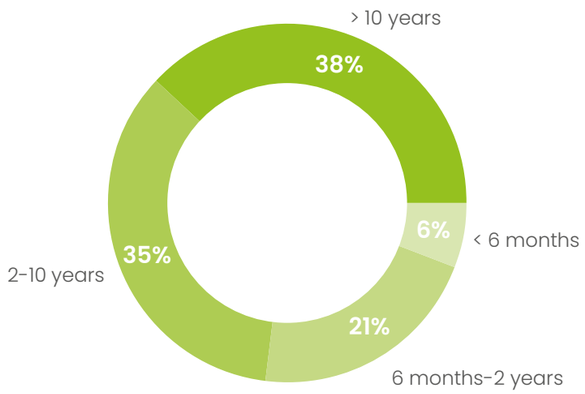
Management	Women	**125%**
	Men	**131%**
Other managers	Women	**111%**
	Men	**117%**

Employee satisfaction survey

– The voice of our employees matters

Satisfaction Survey

In 2023, the first employee satisfaction survey was conducted. The survey was addressed to all employees of Re Alloys and Huta Łaziska. Employees had the option to complete the survey either on paper or on-line. The on-line version was made available on the iHR Employee Portal and sent to official email addresses. The survey was conducted in June 2023, with 275 employees from both companies (Re Alloys and Huta Łaziska) participating.



The participants included both regular employees and management, with a diverse range of tenure within the organisation. For the purposes of the survey, four tenure groups were identified:

1. **employees who have been with the organisation for up to 6 months**
   – 17 people, representing 6% of respondents
2. **employees with a tenure of 6 months to 2 years**
   – 57 people, representing 21% of respondents
3. **employees with a tenure of 2 to 10 years**
   – 96 people, representing 35% of respondents
4. **employees who have been with the organisation for over 10 years**
   – 105 people, representing 38% of respondents

Considering the type of position held, the largest group of respondents consisted of production workers – production and crushing plant (111 people, or 40%), followed by non-production workers (91 people, or 33%), and finally, office workers (73 people, or 27%).

In the survey, an anonymous questionnaire was used, in which employees rated their level of satisfaction with various aspects of working in the organisation on a four-point scale. The aspects were grouped into larger areas to allow for a comprehensive assessment of satisfaction levels and to identify which areas might require corrective actions. The following areas and assessed aspects were highlighted:

WORKING CONDITIONS	Workplace in terms of workstation equipment
	Level of safe and hygienic working conditions provided
	Level of Occupational Health and Safety (OHS) training provided
ATMOSPHERE / TEAM RLEATIONSHIPS	Atmosphere within the team
	Collaboration among colleagues in daily work
	Communication with supervisor
DEVELOPMENT	Access to training and other development tools
	Promotion opportunities at Re Alloys
	Opportunities for skills enhancement
REMUNERATION	Level of salary for the position
	Remuneration rules
	Bonus and reward policy
	Quality of perquisites

Employees were also given the opportunity to share their thoughts, suggestions, and ideas about new solutions that could be implemented in the company.

In the first step, respondents ranked their priorities, identifying the key advantages of working at Re Alloys. The top priorities included *Job stability, working hours, and salary.*

Among all respondents, the highest-rated area was *Atmosphere/Team Relationships, followed by Occupational Health and Safety (OHS) training*. The next area was working conditions, while salary and development were rated slightly lower.

The group most satisfied with the quality of offered benefits were office workers, especially those with shorter tenure.

The survey provided us with a clearer picture of what employees think of Re Alloys as a workplace. We are listening to their feedback to better understand what they need to achieve greater job satisfaction. Following the survey, our focus will be not only on areas that need improvement but also on nurturing and supporting our undeniable strengths.

We value our employees' opinions because their engagement is the foundation of the company's dynamic growth, which is why employee satisfaction surveys will be conducted regularly.

Diversity at REA

The diversity of individuals contributing to Re Alloys is a valuable asset to the organisation and a cornerstone of our company's culture. With this understanding, we strive to create a workplace that is open to diversity, where everyone feels welcomed and respected on a daily basis.

Therefore, we do not tolerate any form of discrimination based on gender, ethnicity, nationality, religion, disability, age, sexual orientation, gender identity, or any other visible or invisible characteristics. We encourage the reporting of any irregularities, and the communication boxes available at our facility allow for anonymity when addressing concerns in this and other areas.

Since 2022, we have been **Signatories of the Diversity Charter** — an international initiative that represents a voluntary commitment by organisations to ensure equal treatment of all employees, prevent any form of workplace discrimination, and take action to create conditions that enable the organisation to engage all stakeholder groups in efforts to protect and promote diversity.

At Re Alloys, we promote diversity with consideration of experience, beliefs and individual traits differentiation. We create labour culture established on mutual understanding and tolerance. By supporting diversity, we benefit from various experiences, recognising our employees as an individual potential. We strive for equal access to posts at each level of organisation.

DIVERSITY CHARTER IN POLAND
COORDINATED BY RESPONSIBLE BUSINESS FORUM
SIGNATORY

One of the important aspects in terms of support for diversity is the position of women in the company. At our organisation, on average women earn more than men, both in managerial and specialist job positions. At Re Alloys, there is almost 500 people hired, women constitute 12% and 23% of managers in the company. In the company, we also aim at ensuring balance between women's and men's remuneration.

Re Alloys Diversity Policy

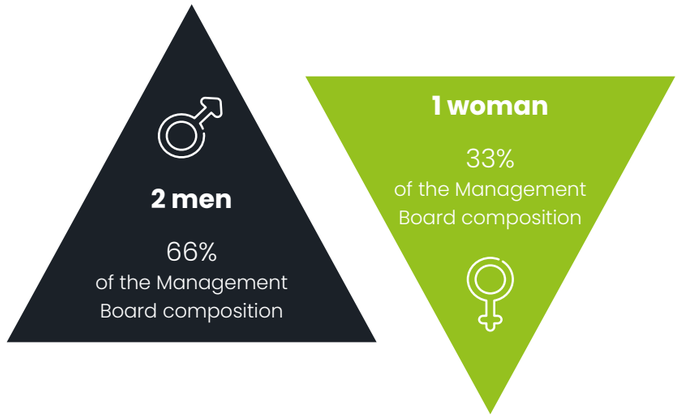
Re Alloys has a **Diversity Policy** that outlines nine key principles, reflecting the commitment of all employees to fostering an open and welcoming work environment.

The company provides equal opportunities for professional development and advancement, regardless of skin colour, religion, gender, age, nationality, sexual orientation, citizenship, marital status, parental status, political views, disability, or any other legally protected status. Employment decisions, including the selection of board members, are made based on objective criteria, including high qualifications, professionalism, and the competencies of the candidate for the specific role. The Diversity Policy aims to eliminate discrimination in the workplace and to build an organisational culture that is inclusive of diverse employees. This approach helps strengthen the company's market position and competitive advantage.

We particularly encourage women to apply for technical and managerial positions and strive to create a mutually supportive work environment through events dedicated to them.

Diversity management also applies to the Company's Management Board's members. The managing staff is composed of individuals of different genders, age, and experience.

Diversity of the Management Board composition



3 people aged 50 and above
100% of the Management Board composition

Work-life balance and fringe benefits

Promoting work-life balance is very important to us, which is why we implement a range of initiatives to help our employees effectively balance their professional responsibilities with personal life. Below are the details of our efforts in this area:

1. **Healthcare and support for parents:**
   We offer a comprehensive healthcare package that includes specialised services for pregnant women and the option to extend insurance to cover the entire family. Caring for the health of our employees and their loved ones is a top priority for us.
2. **Welcome package and support for newborn children of employees:**
   Each employee's child is warmly welcomed with a set of useful gifts and a special congratulatory letter from the company's management. This is our way of supporting employees during an important personal milestone.
3. **Initiatives for Employees' Children:**
   We organise annual events such as meetings with Santa and gift packages for Children's Day and Christmas. Additionally, we support parents during the summer by organising summer camps for children in collaboration with Luma Foundation, giving parents the opportunity to better manage their work schedules and their children's summer activities.
4. **Joint celebrations and integration:**
   Celebrating successes and important dates is a key element of team building. Examples include bowling matches in celebration of Women's Day and the organisation of the company Christmas Eve party, which foster integration and a sense of community among employees from different teams.
5. **Flexible working hours and remote work**
   To further support work-life balance, we have introduced flexible working hours and the option for remote work where feasible. This allows employees to better align their work schedules with their individual life needs.

These initiatives aim to create a supportive work environment that respects and addresses the personal needs of employees while striving to achieve high efficiency and commitment to the company's goals.

As a responsible employer, apart from remuneration, we offer various fringe benefits.

We support our Employees also through the Company Social Fund:

EXPENSES	2023	
	Amount	Number of people
Subsidy to summer holiday	**PLN 782,144.00**	483
Subsidy to children's summer trips	**PLN 56,087.74**	54
Reliefs	**PLN 28,440.00**	17
St. Florian's Day	**PLN 480,300.00**	490
Christmas	**PLN 803,250.00**	482
Sports card	**PLN 31,897.05**	94
Total	**PLN 2,182,118.79**	

Occupational health and safety

At Re Alloys, the safety and health of our employees are an absolute priority. Ensuring compliance with Occupational Health and Safety (OHS) standards is a key element of our responsibility, not only to our employees but also to other stakeholders who expect the highest standards from us when fulfilling contracts.

High level of workplace safety

We are committed to providing our employees with safe and comfortable working conditions. In addition to rigorously meeting all legal and formal requirements, we undertake a range of additional preventive measures to prevent accidents and injuries in the workplace. The most important of these include:

1. **Ensuring Appropriate Working Conditions:**
   - We are equipped with modern and safe first aid tools (AED defibrillators, board lifting stretchers, a set of Kramer wire splints, a CPR kit with intubation tubes and an R1 first-aid kit.
   - We also prioritise the ergonomics of workstations
   - and use the highest quality personal and collective protective equipment.
   - We continuously monitor the levels of harmful factors in the work environment and conduct regular measurements to ensure safety.

2. **Raising employee awareness on OHS:**
   - We organise regular periodic and advanced OHS training tailored to the specific needs of various positions.
   - Additionally, we run information and education campaigns to increase employees' awareness of potential hazards and how to avoid them.
   - We encourage employees to provide feedback and suggestions regarding workplace safety.

Implementing internal regulations:

- We have developed and implemented detailed instructions for the use of machinery and equipment, as well as operational procedures for various workstations.
- We have also created a „General Information on Occupational Safety and Health for External Companies" document that provides all necessary safety information for individuals providing services at Re Alloys.

Occupational risk assessment

In 2023, we conducted a comprehensive update of the Occupational Risk Assessment across all job positions. This process was carried out by teams consisting of representatives from various departments and the OHS (Occupational Health and Safety) service. The detailed job descriptions include:

- A listing of the machines, tools, and materials used.
- A description of the tasks performed.
- Identification of harmful and noxious factors at workplace.
- Specification of the collective and personal protective measures used.
- Identification of individuals working in each position.

The results of the occupational risk assessment are communicated to all employees to ensure they have full awareness of potential hazards and understand the methods to minimise them.

Work Environment Measurements

To protect the health and safety of our employees, we annually commission accredited independent institutions to conduct comprehensive measurements of the work environment. In 2023, 205 measurements were carried out across 41 job positions, covering aspects such as noise levels, dust concentration, and physical and injury-related factors.

OHS Committee

At Re Alloys, a dedicated OHS Committee has been established, which meets once a quarter. The Committee consists of representatives of the employer, including occupational health and safety service employees and a doctor providing preventive healthcare for employees.

OHS trainings

We conduct a wide range of OHS training programs tailored to the needs and nature of various job positions. These include, among others:

1. **Periodic training:**
   - Basic Occupational Health and Safety (OHS) training
   - Job-specific OHS training
   - First aid training
   - Fire safety training
2. **Skill enhancement training:**
   - Wearing protective clothing and personal protective equipment
   - First aid measures
   - Fire protection

In 2022, 296 people participated in health and safety training, while in 2023, 381 people participated

First Aid

In the interest of employee safety and health, we place great emphasis on the ability to provide first aid. To that end:

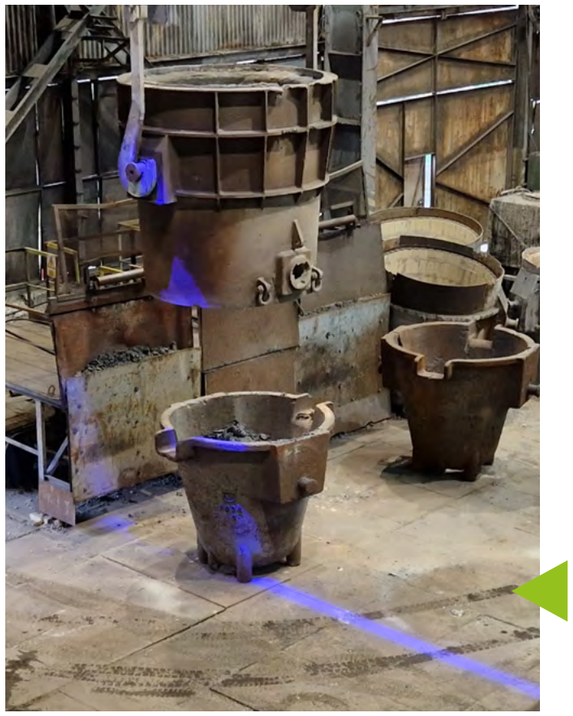
- We conduct regular first aid training for all employees using professional equipment such as a phantom and training AED for CPR, a choking rescue trainer vest, and orthopaedic stretchers (spine boards).
- We have equipped the facility with a modern First Aid Point.
- We ensure access to AED defibrillators.
- We organise practical exercises in first aid.

Accidents at work

At Re Alloys, we make every effort to minimise the number of workplace accidents. In 2023, there were 9 individual accidents involving Re Alloys employees, resulting in temporary unfitness for work. Compared to 2022, there was a decrease in the number of accidents (from 14 to 9). The LTIFR and LTIR rates also declined:

- **LTIFR** (Lost-Time Injury Frequency Rate) = number of lost-time injuries / total hours worked in accounting period x 1'000'000 was 9.35
- **LTIR** (Lost-Time Incident Rate) = number of lost-time injuries / total hours worked in accounting period x 200'000 was 1.87

After each accident, we establish an Accident Investigation Team, consisting of a health and safety officer and a Social Labour Inspector, to investigate the circumstances and causes of the incident. Based on the team's findings, preventive measures are taken to prevent similar accidents in the future.



OHS status analysis

At Re Alloys, we regularly monitor the status of occupational health and safety. Once a year, we conduct a comprehensive analysis that includes, among other things:

- Evaluation of compliance with legal obligations related to OHS.
- Review of working conditions.
- Analysis of the causes of workplace accidents.
- Identification of priorities for preventive actions.

In 2023, 16 ad hoc and comprehensive internal occupational health and safety inspections were also conducted. All post-inspection recommendations were implemented within the designated time frame.

ISO 45001 system

In the interest of continuous improvement in occupational health and safety, Re Alloys is implementing the ISO 45001 management system. The implementation of this system will enable us to:

- Systematically manage occupational risk.
- Improve the identification and control of hazards.
- Raise employee awareness regarding OHS.
- Continuously enhance the safety culture within the company.

At Re Alloys, we prioritise the safety and health of our employees by creating a safe and supportive work environment. We believe that the commitment of all employees is key to achieving our goal of zero workplace accidents.

4.2.

Trustworthy company

We collaborate with our clients based on solid foundations. Our actions are built on three pillars.

Law

We comply with applicable national, EU, and internal regulations. We ensure transparency and fair competition. We respect the right to privacy and protect personal data.

Quality

We hold ISO 9001 and ISO 14001 certifications, which guarantee the high quality of our services. We continuously improve our processes and strive for customer satisfaction. We initiate corrective and preventive actions to ensure the highest quality.

Responsibility

We take responsibility for the products we offer. We have created Safety Data Sheets that contain guidelines for safe use. The sheets are available on our website.

We collaborate with our clients in a reliable and transparent manner. We are committed to building long-lasting relationships with partners and customers. We continuously improve customer service quality through employee training.


TÜVNORD

CERTIFICATE

Management system as per
ISO 9001 : 2015

The Certification Body TÜV NORD CERT GmbH hereby confirms as a result of the audit, assessment and certification decision according to ISO/IEC 17021-1:2015, that the organization

HUTA ŁAZISKA S.A.
ul. Cieszyńska 23, PL / 43-170 Łaziska Górne

operates a management system in accordance with the requirements of ISO 9001 : 2015 at the location

RE Alloys Sp. z o.o.
ul. Cieszyńska 23, PL / 43-170 Łaziska Górne

will be assessed for conformity within the 3 year term of validity of the certificate.

Scope

Production of ferroalloys and post-filtration products.

Certificate Registration No. 04 100 960219-001
Audit Report No. PL22/2023

Valid 2023-09-03
Valid until 2026-09-02
Initial certification 1996

Certification Body
at TÜV NORD CERT GmbH

Katowice, 2023-08-07

This certificate is valid in conjunction with the main certificate.

TÜV NORD CERT GmbH Am TÜV 1 45307 Essen www.tuev-nord-cert.com


IQNet

THE INTERNATIONAL CERTIFICATION NETWORK

CERTIFICATE

Quality Austria
has issued an IQNet recognized certificate that the organization:

Re Alloys Sp. z o.o.
ul. Cieszyńska 23, PL-43-170 Łaziska Górne

for the following scope:
Production and sale of ferroalloys and post – filtration products
EAC: 17

has implemented and maintains an

ENVIRONMENTAL MANAGEMENT SYSTEM

which fulfils the requirements of the following standard

ISO 14001:2015

This attestation is directly linked to the IQNet Partner's original certificate and shall not be used as a stand-alone document

Issued on:	2022-04-14
Validity date:	2025-04-15
Quality Austria certified since:	2019-04-16

Registration Number: AT-03859/2

Alex Stoichitoiu
President of IQNet

Mag. Friedrich Khuen-Belasi
Authorised Representative
of Quality Austria

qualityaustria
Succeed with Quality

Customer experience matters management

Customer experience management is an integral part of our overall business strategy. We understand the importance of providing exceptional customer service and creating positive relationships with our clients. Our approach to Customer Experience Management (CEM) is rooted in the principles of sustainable development, ethical business practices, and transparency, which are reflected in our environmental, social, and governance initiatives. Clients are one of the key stakeholder groups for Re Alloys.

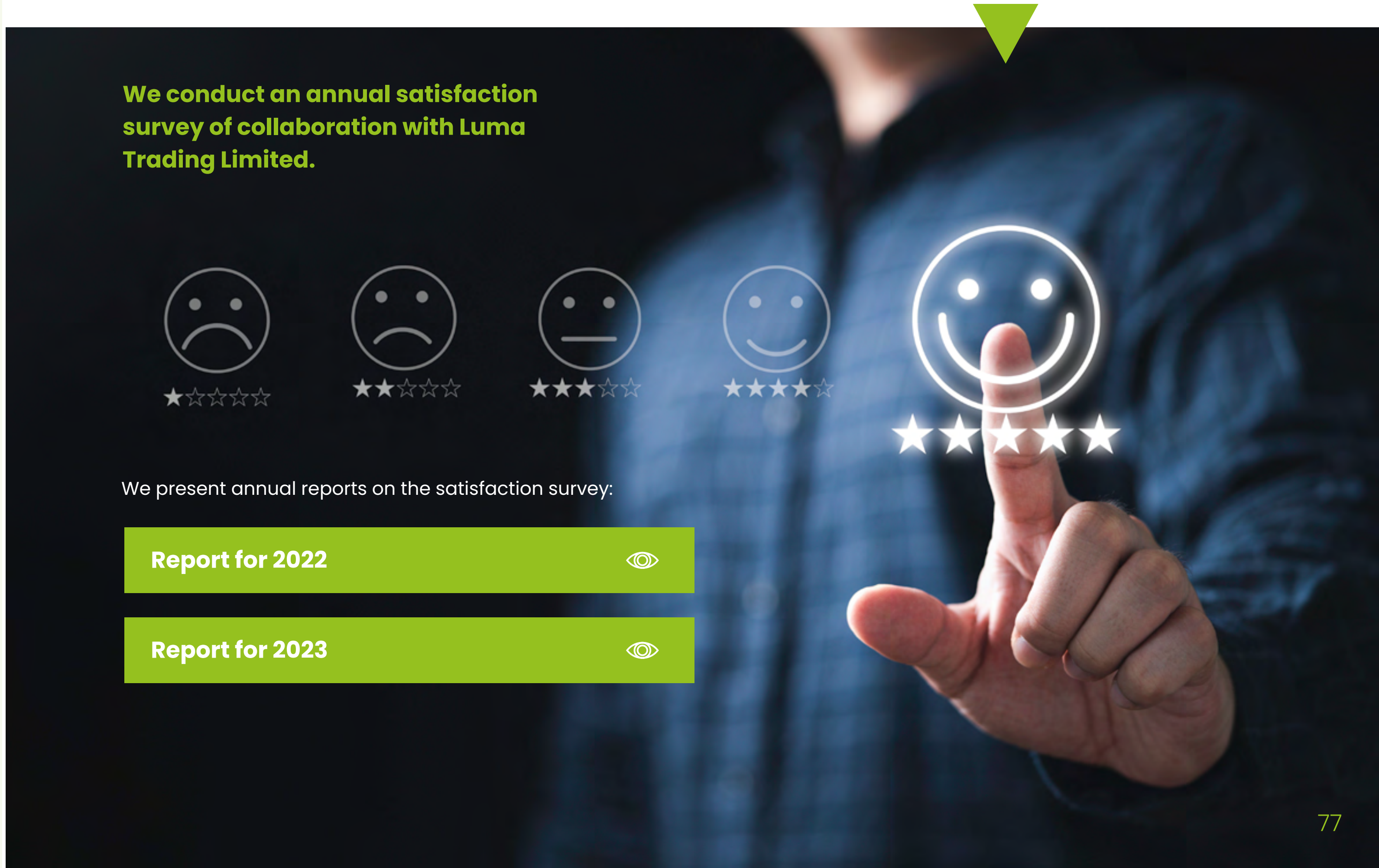
The final recipients of our products are smelters, steel mills, and foundries both in Poland and in other European Union countries. We are eager to share knowledge about the principles and conditions for using our products, as well as the terms of purchase. Safety data sheets containing basic product data are available on the Re Alloys website. Each batch of goods is subjected to chemical analysis before leaving our facility, and the results are presented to our clients. We provide advice on the safe transportation and storage of our products to ensure they maintain their properties.

In our daily operations, we strive to provide the highest quality products and services, ensuring their safety and availability.

We build positive customer experiences through brand credibility, keeping our promises, and instilling trust. We take full responsibility for our products and services.

The main principles guiding our customer relationships are directly derived from the "Code of Ethics and code of business conduct", and these are:

- adherence to high ethical standards;
- responsibility for the products and services offered, as well as their quality;
- clear and understandable guidelines for the use of products and services;
- transparent marketing communication.



We conduct an annual satisfaction survey of collaboration with Luma Trading Limited.

We present annual reports on the satisfaction survey:

Report for 2022

Report for 2023

Responsible supply chain

Our supply chain is formed by almost 400 small, medium, and large enterprises. The majority of them are Polish enterprises. We are a large company undertaking major investments, so naturally, we serve as a source of attractive and lucrative contracts for subcontractors. We support job creation in the country and the Polish economy, but we understand our responsibility in a broader context than just economics. We want Re Alloys to have an impact on its subcontractors in matters of social responsibility, safety, and environmental protection as well.

As a leading ferroalloys producer in Europe, Re Alloys cooperates each day with many suppliers and contractors. Selection of suppliers is carried out in accordance with the procurement process, which we construct transparently, in compliance with legal principles and internal procedures.

Supplier Management

Our primary goal is to collaborate with suppliers who adhere to the core principles that we uphold, such as:

- identifying and jointly pursuing goals,
- ensuring timely deliveries and the execution of services with attention to quality and environmental care,
- safety and values,
- adherence to high ethical standards.

Order execution is performed based on content-related criteria and clear rules. We conduct our business in a responsible and ethical manner. We expect the same from our suppliers and business partners, particularly in terms of respecting human rights, tolerance, diversity, honesty, compliance with applicable laws, and combating corruption. That is why we developed the "Code of Ethics and Code of Business Conduct" and the "Rules of Procedure for Suppliers" as a set of cooperation rules for suppliers and subcontractors. Each contractor is obliged to familiarise themselves with and adhere to the applicable principles in accordance with "Rules of Procedure for Re Alloys Suppliers".

The sustainable supply chain at Re Alloys focuses on minimising adverse impacts on the environment and society. Climate change is one of the most serious threats of the 21st century, affecting not only businesses but also all citizens. For this reason, Re Alloys consistently supports solutions aimed at reducing greenhouse gas emissions into the atmosphere.

In 2021, we have commenced an initial monitoring of carbon footprint at our suppliers. We conduct supplier assessments, wherein one of the criteria is the ISO14001 certification. Thus, we emphasise the importance of environmental process management among our suppliers.

Protection of personal data and cybersecurity

Re Alloys operates in accordance with Polish legal standards, as well as international legal norms within the conventions to which Poland has acceded, particularly regulations concerning safety and data protection.

Recognising the risks associated with cybercrime, Re Alloys consistently takes measures to adequately secure both the company's data and entrusted information.

In accordance with the requirements of the GDPR (General Data Protection Regulation, in effect since 25th May 2018), we protect personal data through actions that include updating relevant processes, procedures, and policies, making changes in data flow and storage management, ensuring appropriate communication, and incorporating GDPR requirements into projects and system management.

All employees of our organisation, as well as external entities providing services or cooperating with us, are involved in the process of ensuring security and data protection.

The above principles are achieved by adhering to the rules outlined in the implemented documents:

- "Cybersecurity Instruction"
- "Re Alloys Personal Data Protection Policy"
- The "IT System Management Instruction", as well as the organisation of regular training sessions.

In 2023, we modernised the network infrastructure across the entire facility, systematically implemented IT solutions for effective detection and blocking of cyber-attacks, and conducted training for management, the Management Board, and HR staff on data protection. In 2023, we did not record any security incidents.

4.3.

Socially committed business

Re Alloys demonstrates a strong commitment to social initiatives, which are a key element of our corporate responsibility and contribute to improving the quality of life in local communities. Our social initiatives are carried out with the active support of our employees and local communities, aligning with the philosophy of co-creating value for our surroundings.

The key areas of social impact of Re Alloys based on the United Nations Sustainable Development Goals (SDGs):

Each year, the company actively participates in various social initiatives, launches campaigns, and projects that engage residents and address important social issues. Our efforts focus on areas such as education, individual and social development, promotion of a healthy lifestyle, care for the natural environment, and support for charitable and aid initiatives.

Re Alloys' social and sponsorship activities reflect our concern for the future of the region in which the company operates, confirming our commitment to creating a valuable place to live and work. Our approach reflects the company's vision as an active participant in social life, continuously striving to be a good neighbour and a responsible business partner.

Cooperation with Luma Foundation

In recent years, our commitment to environmental protection and support for the local community has significantly increased. Social responsibility has become an integral part of the values that are important to us. Therefore, since 2022, we have been collaborating with Luma Foundation, established by the owner of the Luma Holding Capital Group. We support it not only financially but also by providing expertise, enabling our employees to engage in its activities through employee volunteering. Together, we create projects that support the implementation of ESG principles in our organisation.

The foundation's primary objective is to support employees and companies within the Luma Holding Group in implementing initiatives for sustainable development. The foundation's goals are pursued based on two pillars: environmental activities and social initiatives.

The year 2023 was an intense period for the implementation of new environmental and social projects. The environmental initiatives, under the slogan 'Caring for Our Planet,' focused on education and building environmental awareness. During numerous upcycling and recycling workshops, as well as 'garage sales,' topics such as overproduction and product reuse were addressed, while tree planting campaigns and the construction of bird nesting boxes emphasised the importance of caring for nature.

The social initiatives, on the other hand, were guided by the motto 'We Help Families Build a Better Future.' In this area, we concentrated our efforts on topics such as developing interests and broadening horizons for children and youth, equalising opportunities, and addressing health protection and the promotion of a healthy lifestyle. The flagship project in this area was the summer camps for children, with a program based on active interaction with nature and elements of environmental education.

Embracing the spirit of our mission 'Let's do something good together,' we aim to involve not only the employees of the Luma Holding Group, including Re Alloys, but also local communities, in our projects. The word TOGETHER is crucial here. In implementing the projects, we established cooperation with the Kobiór Forest Division, "State Forests" National Forest Holding, the Polish Scouting Association—with teams in Katowice and Łaziska Górne, the Social Development Centre in Mikołów, and the Municipal Community Centre in Łaziska Górne.

We welcome the year 2024 with new energy to take actions.

Social projects and initiatives in 2023

At Re Alloys, we support and initiate social actions on a daily basis, and our efforts attract employees who are eager to engage in volunteering. We believe that even the smallest action makes the difference.

The most important initiatives implemented in 2023 include:

1. The "Go out, plant a tree" campaign, during which 3,000 trees were planted in the Kobiór Forest Division. The campaign was accompanied by an event – building bird nesting boxes, resulting in the creation of 30 birdhouses, which were then donated to the forest district.
2. We have established cooperation with the University of Economics – Re Alloys committed to providing active support and expertise to students of the Urban Economy and Real Estate program, as well as collaborating in the process of enhancing the university's educational offerings and strengthening the practical aspects of education.
3. Children's Camps – 30 children of our employees participated in summer camps, during which they spent time in nature and learnt to respect the surrounding environment.
4. We initiated cooperation with the Gostyń Community Centre becoming the Patron of the Centre. As part of our collaboration, we support local cultural events, including the brass band festival, which promotes local traditions.
5. We participated in events organised by local institutions. This included the event "Battle of Mikołów – Fight for Gostyń", which has become a permanent fixture in the local events calendar. At the event, we had our booth where we provided information about our work and our investment projects in green technologies.

Environmental protection is of utmost importance to us, so we engage and encourage our employees to join forces in protecting our planet. In October, Re Alloys organised the tree-planting campaign 'Go out, plant a tree' during which 3,000 plants were planted in Łaziska Górne. The tree-planting campaigns carried out by Re Alloys aim to reduce the amount of carbon dioxide in the atmosphere, including that emitted by the smelter. An important intention behind these activities is also to draw attention to environmental issues – environmental education, promoting pro-environmental

attitudes, and encouraging active recreation among children, youth, employees, and local communities. Re Alloys employees, their families and friends, local scouts from Łaziska, and employees of the Forest District, who coordinated the events and provided expertise, were invited to participate in the campaign. Over 150 people actively participated in the event. The campaign was accompanied by an event – building bird nesting boxes, resulting in the creation of 30 birdhouses, which were then donated to the forest district.

We care about the health of our employees, so we provide them with access to private medical care and sport membership cards.

We promote an active and healthy lifestyle. We are expanding our running group, encouraging employees to train together and participate in running events, including those supporting charitable causes. Our motto is 'I run – I help!

At Re Alloys, we understand how important education is, which is why we offer our employees a range of opportunities to improve their qualifications. We are carrying on with the English language course, which is open to all company employees. Last year we established cooperation with the University of Economics—Re Alloys committed to providing active support and expertise to students of the Urban Economy and Real Estate program, as well as collaborating in the process of enhancing the university's educational offerings and strengthening the practical aspects of education. Through collaboration, Re Alloys will contribute to the education of future specialists and co-create and improve educational programmes.

Expanding horizons and educating the youngest is also extremely important to us, which is why the children of our employees had the opportunity to participate in summer camps organised in cooperation with Luma Foundation. During the camps, the young participants spent time in nature and learnt to respect the surrounding environment. Elements of environmental education were woven into the camp schedule.

We believe that every child has a talent; it just needs to be recognised. During the Family Picnic, we organised a talent show where the youngest could showcase their unique skills.

We emphasise the importance of family bonds and values, and promote spending time together. We organise interesting events for our employees and their families, such as the Family Picnic or a meeting with Santa. Thanks to numerous competitions we encourage the young generation to seek active and creative ways of spending free time.

A useful tool in terms of education is our company newsletter where we regularly publish educational articles. The objective which is particularly close to the company is the environmental liability. We are convinced that thanks to environmental education and raising environmental awareness from the earliest age we are able to strengthen the sense of responsibility for the natural surroundings. We support employee volunteering, such as collecting bottle caps for charitable causes or participating in initiatives organised by Luma Foundation.

Every year, our employees get involved in helping others by participating in charitable actions like the WOŚP (Great Orchestra of Christmas Charity) and Szlachetna Paczka (Noble Gift).

RE ALLOYS
RENEWABLE ENERGY ALLOYS

5

Corporate governance

GRI [GRI 2-9], [GRI 2-10], [GRI 2-11], [GRI 2-12], [GRI 2-13], [GRI 2-14], [GRI 2-15], [GRI 2-16], [GRI 2-17], [GRI 2-18], [GRI 2-23], [GRI 2-24], [GRI 2-25], [GRI 2-26]

5.1.

Management structure

We understand that running a business sustainably cannot rely solely on declarations. Responsible business means not only a profit-oriented organisation, but it also entails care and realistic commitments towards the environment, society, economy, customers, employees, also observance of the highest corporate governance standards.

Legal frames of Re Alloys Management Board activities are set out by the Polish Commercial Companies Code and other regulations such as the Articles of Association and the Board Standing Orders.

The company governing bodies are the Management Board and the General Meeting of Shareholders.

The Management Board takes its decisions by adoption of resolutions. Resolutions of the Management Board are adopted by a simple majority of votes present at the Management Board meeting, at presence of at least half of its Members. In case of equal number of votes, Management Board President has a deciding vote. The Management Board of RE Alloys is composed of three members, including Management Board President, who are appointed and dismissed by the Shareholders' Meeting. Management Board Members are appointed for a joint term of office of three years. The composition has not changed since February 2018.

The General Meeting of Shareholders exercises the utmost care to provide versatility and diversity of the Company's bodies by selection of candidates.

Average attendance of the Management Board Members at weekly meetings in 2022 was 88% and in 2023 – 89%. Each year, along with approval for financial statements, the Management Board is granted discharge, what is defined as a positive assessment of the Management Board's works.

Management Board Members do not hold the company's shares.

RE Alloys sp. z o.o. is part of the Luma Holding Limited group. – family company owned by prof. dr. Radosław Miśkiewicz, Prof. of the University of Szczecin, who holds jointly (directly and through Luma Holding Ltd.) 27,129 shares, what constitutes 100% of the company's share capital.

In the best interest of the company

In compliance with the **Policy on countering unfair practices in the LUMA Group**, all business decisions are made only in the best interest of the Company. It is expected that all employees and partners of Re Alloys avoid conflict of interest relating to personal affairs or business and non-business activity, including those of relatives or other related people. Each employee is prohibited, directly or indirectly, from:

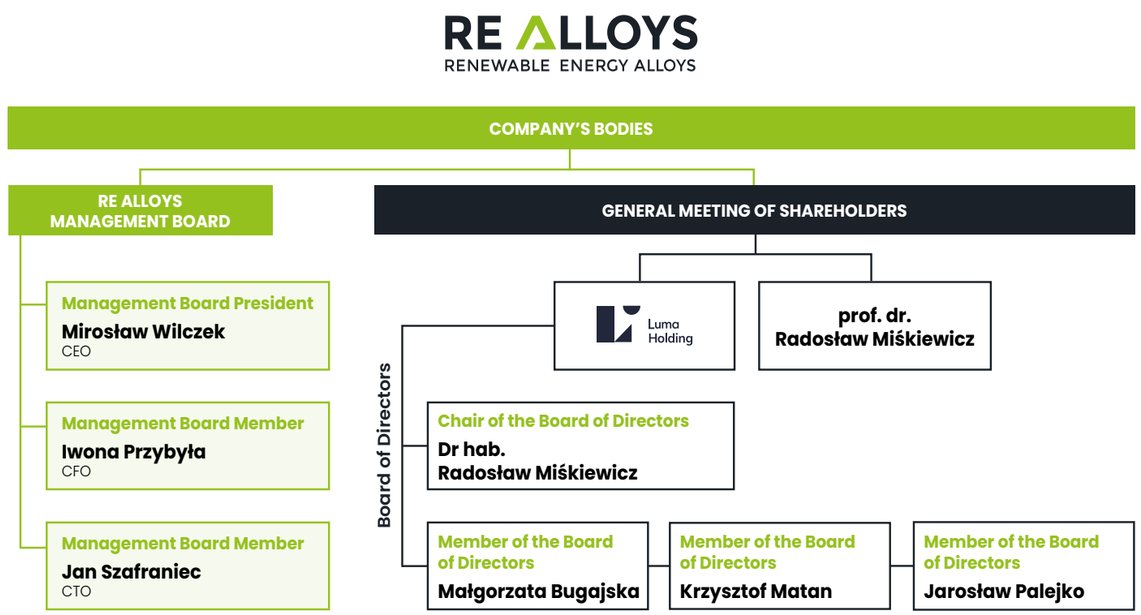
- Having any financial interests that may adversely affect the outcome of performed duties, benefiting from any agreement between Re Alloys and a third party, in case the particular employee has the possibility to influence decisions made in relation to this agreement;

or

- trying to influence any decision to be made by Re Alloys regarding any matter in order to derive any direct or indirect personal benefit.

Each employee's duty is to respond immediately to the measures that are a prohibited act (especially a corrupt activity) and to notify the Management Board. The Management Board's representative, having become aware of the unfair practice will take investigative measures or will submit a notification to the law enforcement. Then, an analysis preventing such events in the future will be conducted. However, in case of critical matter the Management Board is notified without any delay. These matters are examined in an urgent procedure.

Organisational structure



Re Alloys Management Board

Mirosław Wilczek

President of the Management Board,
CEO

Since 2018

Experience

- Almost 30 years of experience in the business
- Unrivalled knowledge and experience in international companies management
- Creating development strategies for enterprises and supervision over their implementation
- Oversight of the fields of company's operation
- Expertise in metal trading and in market analysis
- Long-standing experience in R&D projects management
- Long-term cooperation with scientific centres such as the AGH University of Science and Technology in Cracow, the Silesian University of Technology or the Central Mining Institute

Education

- Organisation and Management Department, Silesian University of Technology
- Automatics, Electronics and Computer Science, Silesian University of Technology

Iwona Przybyła

Management Board Member,
CFO

Since 2018

Experience

- Over 20 years of experience in industrial companies
- Cooperation with banks and financial institutions
- Financial reporting to a parent company
- Supervision of the company's financial policy, including the development of financial strategy, preparation of financial analyses of the company
- Participation in drawing up of investment plans
- Verification of projects with respect to financial risk
- Supervision over the field of procurement and logistics
- Oversight of the HR policy and the remuneration and trainings budgets

Education

- Post-graduate studies based in the MBA programme, Warsaw School of Economics
- The University of Economics and Humanities in Bielsko-Biała

Jan Szafraniec

Management Board Member,
Technical Director

Since 2007

Experience

- In the ferroalloys industry for 30 years
- Unrivalled knowledge and experience in the field of ferroalloys production management
- Many years of supervision over energy trading
- Surveillance over technical and production fields
- Specialist in the field of technical equipment applied in the ferroalloys industry
- Specialist in exploitation and diagnostics of transformers,
- Long-standing cooperation with scientific centres such as the AGH University of Science and Technology in Cracow, the Centre for Energy Research and Development

Education

- Automatics, Electronics and Computer Science, Silesian University of Technology

General Meeting of Shareholders

Prof. dr. Radosław Miśkiewicz, professor of the University of Szczecin and Luma Holding represented by the Board of directors in the composition of:

Prof. dr. Radosław Miśkiewicz, professor of the University of Szczecin

Prof. dr. Radosław Miśkiewicz is Chair of the Board of Directors of Luma Holding and the founder of the Luma Industrial Fund. He is a business leader with over 20 years of business experience and a leading expert in the field of knowledge transfer, industrial process digitalisation towards Industry 4.0.

Dr Małgorzata Bugajska

Małgorzata oversees new investments and innovation initiatives of all the Luma Holding funds. She is an experienced manager with proven track record in digital strategy, foresight, technology-based innovation and the development of new mobile products.

Jarosław Palejko

Jarosław Palejko is an expert with over 15 years of experience in capital markets and in managing companies' financials. He has w proven track record in IPOs, private offering, securities, and structures transactions. As Investment Director, he is responsible for financing strategic projects within the Luma Holding Group.

Krzysztof Matan

An attorney at law and a legal counsel with considerable experience in legal services management. For several years, he has been actively participating in operation of supervisory boards of companies

The General Meeting of Shareholders exercises regular supervision over the operation of Re Alloys in every field of its business activity. The competences and duties of the General Meeting include, among others, appointment and dismissal of management board members, determining employment and remuneration rules for them, granting consent for disposing of right or incurring a liability to the set limits in accordance with the articles of association. The General Meeting may express opinion in all matters related to the Company's operation, also may make requests and proposals to the Management Board. The General Meeting on an ongoing basis gathers information on the ESG measures, on projects, and planned investments.

Luma Holding

Management of environmental and social impacts

At Re Alloys, we manage the ESG matters in a centralised manner, reaching environmental, social, and corporate solutions consistent for the entire organisation. For a few years, we have been broadening our ESG knowledge and we develop competencies of the responsible staff members.

Management Board members regularly strengthen their knowledge in the field of ESG. For this purpose, they participate, for example, in meetings devoted to the ESG and sustainable development matters, also in external ESG seminars.

The purpose of our actions is to meet the existing and future regulatory requirements, expectations of our customers and stakeholders, therefore we gradually implement standards and procedures of the environmental, social, and corporate governance scopes.

Role in the ESG management

The General Meeting	■ approval of directions and development strategies of the company
Re Alloys Management Board	■ continuous monitoring ■ supervision of the implementation of adopted strategies, including the Going Green Strategy ■ control of risks, including ESG risks
Chief Financial Officer	■ financing planning for ESG and SD projects ■ representation of the company at the capital and financial market
ESG team	The team is led by Corporate Governance Manager and it is composed of Directors and Managers in charge of the company's departments. Its role is to implement the sustainable development strategy and work in the area of SD. The team reports directly to the Management Board of Re Alloys.

What we worked on in 2023

We worked on:

- implementing the Going Green strategy and achieving the goals set for 2023
- on developing ESG competences (trainings, webinars, conferences)
- drafting and implementing the Organisational Culture

All actions are consulted with the Management Board.

Re Alloys activity it is also the responsible reporting. The ESG team worked on preparation of the report falling into line with the current requirements. At the same time, all our actions are aligned with and aimed at preparing for reporting according to the new guidelines.

5.2.
Non-financial risk management

An optional environmental management system implemented in the organisation allows the successful identification of environmental risks and opportunities and introduction of effective steps to face them, both in current operational and strategic planning.

Within the risk management policy, we identify environmental aspects related to all the organisation operation fields and adopt procedures, instructions, and other regulations enabling to limit the probability of threats and minimising impact on the environment.
Risk management is a basis for the environmental management system in the organisation and it constitutes a footing for the climate and natural environment measures.

In 2023, the organisation commenced the process of the ISO 22301 system implementation – a system related to the business continuity management. The ISO 22301 system aims at providing readiness for maintaining the operation in cases of emergency situations, natural disasters or IT glitches. The business continuity management system includes continuity planning for critical business processes, as well as planning for operations in the event of a failure, disaster, or other adverse events.

5.3.
Ethics and compliance

Re Alloys implements all projects and initiatives in accordance with the highest ethical standards, which stem from the company's mission, business ambitions, and adopted values.

We fully endorse the principles of the Universal Declaration of Human Rights and the Charter of Fundamental Rights of the European Union and we implemented them systematically by setting the rules of procedure and implementing relevant internal regulations.

Since 2021, we have been consequently developing our whistleblowing scheme.

- internal regulation, in particular "the Procedure of reporting actual or potential breaches", "the Code of ethics and code of business conduct";
- the office responsible for reports collection;
- periodic assessment of the non-compliance risk and assessment and update of the implemented whistleblowing scheme;
- trainings and communication aiming at building organisation's ethical culture.

Code of ethics

The collection of ethical standards and best practices that Re Alloys commits to adhering to is regulated by

"Code of Ethics and Code of Business Conduct".

It outlines the attitude and rules of conduct that are desired at Re Alloys, and those that are deemed inappropriate and inadmissible. This concise set of guidelines and values upholds the idea of responsible and transparent approach.

The Re Alloys code of ethics applies to every employee, associate, management staff member, regardless their function or position.

The Re Alloys code of ethics includes in particular:

Information security and data protection

- protection of personal data
- confidentiality
- information security

Re Alloys as a diverse work place

- equal treatment
- development of vocational qualifications

Lawfulness and preventing corruption

- preventing corruption and abuse

Relations with customers

- integrity
- professionalism
- transparency

Re Alloys as a safe work place

- adhering to occupational health and safety rules
- reasonable use of raw materials and resources
- environmental protection

Trainings from the scope of "the Code of ethics and code of business conduct" are held regularly and are mandatory to all the employees as a form of countering abuse at Re Alloys. They are designed to build organisation's ethical culture.

A supplement for the Code of ethics are internal and external policies and regulations at Re Alloys, in particular:

- "Diversity Policy",
- "Anti-mobbing Policy",
- "Procedure of reporting actual or potential breaches",
- "Policy on countering unfair practices in the LUMA Group".

On the strength of the "Code of ethics and code of business conduct" the company devised "the Rules of Procedure for Suppliers", which are given to counterparties for them to get familiar with. The company obliges its suppliers and subcontractors to follow this set of rules.

All the mentioned documents are available at:
https://realloys.pl/en/esg-en/

Mechanism of reporting breaches

A formalised mechanism for reporting violations is in place at Re Alloys. It was implemented in 2021. This system defines the rules for making and reviewing reports and aims to provide safe channels for employees to report observed actions or practices that are unethical or contrary to the applicable law or the company's established principles.

The available channels for reporting irregularities:

- anonymous report – no possibility to identify the Reporting Person,
- non-anonymous report – providing a possibility to identify the Reporting Person and reply them.

A received report is immediately transferred to the internal audit office responsible for carrying out proceedings.

Re Alloys ensures complete confidentiality for the Reporting Person and protection against any retaliatory or repressive actions.

Re Alloys provides or cooperates in remediation of negative effects of our business activity to the extent it is reasonably possible taking into account the degree of effect and influence. Apart from the mechanisms described here, we pay particular attention to our Due Diligence findings and assessment of influence on human rights.

Re Alloys in 2023 did not report any cases in terms of violation of human rights or the code of ethics.

5.4.

Respect for human rights at REA

At Re Alloys, we are committed to protecting, promoting, and upholding human rights wherever we operate and in relation to all entities that we impact, either directly or indirectly.

In 2021, the Re Alloys Management Board adopted the "**Human Rights Respect**" document for implementation. It is publicly available (including on the company's website) and familiar to employees through Human Rights Respect training, which is conducted regularly and mandatory for all employees as a means of preventing misconduct and fostering an ethical organisational culture.

In order to increase awareness of our involvement in human rights and to promote implementation of this policy, we train and educate our employees on human rights matters. In 2022, human rights training was conducted for all employees. Employees in various departments were trained by their supervisors. Employees without access to a computer received training brochures. The training aimed at systematising knowledge about human rights.

In 2022, Re Alloys conducted **a due diligence analysis in terms of human rights** and the environment. The procedure consisted of the identification, analysis, and reduction of threats for people and the environment in the entire supply chain. The company places the highest importance on the protection of human rights, allowing for the identification of irregularities to prevent violations. The Management Board supports actions arising from the Policy and ensures the necessary resources and means to implement and maintain the actions defined within it (declaration).

In May 2022, an anonymous survey was conducted among employees to monitor compliance with Human Rights and assess potential risks. The survey did not reveal any violations. These surveys will be conducted regularly to monitor compliance with human rights

Re Alloys is committed to adhering to the rights and provisions defined in the following internationally recognised documents:

- Universal Declaration of Human Rights
- International Bill of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

The most important principles formulated in the "Respect for human rights" paper

- respect for diversity
- prohibition of forced labour, human trafficking
- prohibition of corruption and bribery
- freedom of association
- environmental protection
- abiding by the applicable law on working hours and pay
- occupational health and safety
- responsible cooperation with suppliers

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About the report

GRI [GRI 2-2], [GRI 2-3], [GRI 2-5]

6.1.

The background for the report

This non-financial report is the company's second report of this kind. Non-financial reports for Re Alloys will be prepared annually, based on the calendar year. The previous non-financial report for Re Alloys covered the years 2021-2022.

The ESG report for Re Alloys includes non-financial data for the period from 1st January to 31st December 2023.

This document contains key data for 2023 related to the activities of Re Alloys and information concerning our responsibility towards employees, society, our surroundings, and the environment.

It also considers issues related to respecting human rights and combating corruption. In the particular chapters of the report, the management approach is presented, including key policies and internal regulations implemented in Re Alloys related to the mentioned areas of responsibility and implemented due diligence procedures.

The report has been prepared based on the international Global Reporting Initiative Standards (GRI Standards 2021). The report has not undergone external audit.

This publication is the result of months of work by employees representing various departments of Re Alloys Sp. z o.o.

We would like to express sincere thanks to all individuals within and outside the organisation for their involvement in the creation of this publication.

Contacts

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6.2.

The GRI index

Sustainable Development Report of Re Alloys sp. z o.o. for the period from 01 January 2023 to 31 December 2023 has been prepared based on the GRI Reporting Standards.

GRI 1 version applied:

GRI 1 Foundation 2021

Sector Standard :

none

Indicator no.	GRI Standard	Indicator name	Omitted requirements + explanations for omission	Chapter in the report
GRI 2 GENERAL DISCLOSURES				
Organisation and its reporting practices				
GRI 2-1	**GRI 2** General disclosures	Organisational details		1.1., 1.3.
GRI 2-2		Entities included in the organisation's sustainability reporting		6.1.
GRI 2-3		Reporting period and contact point		6.1.
GRI 2-4		Restatements of information	No restatements	
GRI 2-5		External assurance		6.1.
Activities and employees				
GRI 2-6	**GRI 2** General disclosures	Activities, value chain, and other business relationships		1.3., 1.4., 2.1., 4.2.
GRI 2-7		Employees		4.1.
GRI 2-8		Workers who are not employees	not applicable	
Management				
GRI 2-9	**GRI 2** General disclosures	Management structure		5.1.
GRI 2-10		Nomination and selection of the highest governance body		5.1.
GRI 2-11		Chair of the highest governance body		5.1.
GRI 2-12		Role of the highest governance body in overseeing the management of impacts		5.1.
GRI 2-13		Delegation of responsibility for managing impacts		5.1.
GRI 2-14		Role of the highest governance body in sustainability reporting		5.1.
GRI 2-15		Conflict of interest		5.1.
GRI 2-16		Communication of critical concerns		5.1.
GRI 2-17		Collective knowledge of the highest governance body on sustainable development		5.1.
GRI 2-18		Evaluation of performance of the highest governance body		5.1.
GRI 2-19		Remuneration policies	Reason for omitting information:	
GRI 2-20		Sensitive data	Reason for omitting information	
GRI 2-21		Process to determine remuneration	Reason for omitting information:	
Strategy, policies and practices				
GRI 2-22	**GRI 2** General disclosures	Statement on sustainable development strategy		1.1., 1.2., 2.4.
GRI 2-23		Policy commitments		5.1., 5.3., 5.4.
GRI 2-24		Embedding policy commitments		5.1.
GRI 2-25		Processes to remediate negative impacts		5.2., 5.3.
GRI 2-26		Mechanisms for seeking advice and raising concerns		5.3., 1.4.
GRI 2-27		Compliance with laws and regulations	Investigation before the President of the Energy Regulatory Office (URE)	

Indicator no.	GRI Standard	Indicator name	Omitted requirements + explanations for omission	Chapter in the report
Relations with Stakeholders				
GRI 2-28	**GRI 2** General disclosures	Membership in organisations		1.4.
GRI 2-29		Approach to stakeholder engagement		1.4.
GRI 2-30		Collective bargaining		4.1.
GRI 3 KEY TOPICS AND CONCERNS RAISED				
GRI 3-1	**GRI 3** Material topics 2021	Guidance to determine material topics		2.3.
GRI 3-2		List of material topics		2.3.
GRI 3-3		Management of material topics		1.3., 1.4., 2.2., 3.1., 3.2., 4.3.
SPECIFIC GRI – DETAILED DISCLOSURES ON MATERIAL TOPICS				
Environmental issues (Material Topic: Impact on climate)				
GRI 302-1	**GRI 302** Energy 2016	Consumption of energy by the organisation		3.3.
GRI 303-1	**GRI 303** Water and wastewater 2018	Interactions with water as a shared resource		3.5.
GRI 303-2		Management of water discharge-related impacts		3.5.
GRI 303-3		Water withdrawal		3.5.
GRI 303-4		Water discharge		3.5.
GRI 303-5		Water consumption		3.5.
GRI 305-1	**GRI 305** Emissions 2016	Direct greenhouse gas emissions (scope 1)		3.4.
GRI 305-2		Indirect greenhouse gas emissions (scope 2)		3.4.
GRI 306-1	**GRI 306** Wastes 2020	Waste generation and significant waste-related impacts		3.6.
GRI 306-2		Management of significant waste-related impacts		3.6.
GRI 306-3		Waste generated		3.6.

Indicator no.	GRI Standard	Indicator name	Omitted requirements + explanations for omission	Chapter in the report
Social issues (Material Topic: Social impact)				
GRI 403-1	**GRI 403** OHS 2018	Occupational health and safety management system		4.1.
GRI 403-2		Hazard identification, risk assessment, and incident investigation		4.1.
GRI 403-3		Occupational health services		4.1.
GRI 403-4		Worker participation, consultation, and communication on occupational health and safety		4.1.
GRI 403-5		Worker training on occupational health and safety		4.1.
GRI 403-6		Promotion of worker health		4.1.
GRI 403-7		Prevention and mitigation of occupational health and safety impacts directly linked by business relationships		4.1.
GRI 403-8		Workers covered by an occupational health and safety management system		4.1.
GRI 403-9		Work-related injuries		4.1.
GRI 403-10		Occupational diseases		4.1.
own indicator	**GRI 401** Employment 2016	New employee hires and employee turnover		4.1.
GRI 401-2		Benefits provided to full-time employees		4.1.
GRI 404-1	**GRI 404** Trainings and education 2016	Average hours of training per year per employee		4.1.
GRI 404-2		Programs for upgrading employee skills and transition assistance programs		4.1.
GRI 405-1	**GRI 405** Diversity and equal opportunity	Diversity of governance bodies and employees		4.1.
GRI 405-2		Ration of basic salary and remuneration of women to men		4.1.

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Financial data

Financial data

	Note	Period ended 31/12/2023	Period ended 31/12/2022
		PLN	PLN
Revenue and operating expenses			
Revenue from sales	5	755,114,992	1,248,179,608
Other operating revenue	9	4,102,092	5,205,624
Change in inventories, finished goods and work in progress		73,108,299	52,898,895
Depreciation	13	(25,466,276)	(18,129,342)
Use of raw materials and consumables		(249,148,778)	(258,922,246)
External services		(171,536,278)	(405,192,438)
Wages and salaries	13	(59,504,029)	(53,194,791)
Taxes and charges		(5,552,742)	(3,611,246)
Other expenses by type		(2,978,739)	(1,164,124)
Other operating income	9	(12,196,463)	(6,630,584)
Value of goods and materials sold		(282,724,590)	(501,690,137)
Profit (loss) on operating activity		**23,217,489**	**57,749,219**
Financial revenues	7	6,829,077	8,623,010
Financial expenses	8	(15,808,186)	(17,288,199)
Profit (loss) on sale of shares in subordinated units and derivatives		-	-
Profit (loss) before tax		**14,238,379**	**49,084,030**
Profit Income tax	10	(1,225,306)	
Net profit (loss) from continuing operations		**-**	**(10,773,856)**
Profit (loss) from discontinued operations		-	-
NET PROFIT (LOSS)		**13,013,073**	**38,310,174**

Contact

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